# M TORONTO

## STAFF REPORT ACTION REQUIRED

## Update on the Strategy for the Management of Emerald Ash Borer

Date:	February 2, 2012
То:	Parks and Environment Committee
From:	Jim Hart, General Manager, Parks, Forestry and Recreation Division
Wards:	All
Reference Number:	P:\2012\Cluster A\PFR\PE11-021712-AFS#14807

## SUMMARY

The purpose of this report is to provide an update on the status of the Emerald Ash Borer (EAB) Management Plan and bring to City Council's attention the significant financial pressure resulting from the infestation.

The staff report to the Parks and Environment Committee dated March 16, 2011, which was adopted as amended by City Council on April 12 and 13, 2011, provided a general overview of a dedicated and comprehensive EAB Management Plan. The plan is designed to manage and mitigate the impact of EAB on the City of Toronto's urban forest and included five key components: (1) Monitoring (Survey) (2) Education (Communication) Plan (3) Pesticide Treatments (4) Removal of Infested Trees and (5) Tree Canopy Replacement. This report provides a status update for each of the five components of the plan and identifies a financial estimate for additional resources that will be required to continue with the EAB Management Plan in 2012.

## RECOMMENDATIONS

**The General Manager of Parks, Forestry and Recreation recommends that** the Parks and Environment Committee request the General Manager of Parks, Forestry and Recreation to explore all options for additional and future funding for the management of Emerald Ash Borer (EAB), in consultation with the Deputy City Manager and Chief Financial Officer, and report directly to the Budget Committee through the 2013 budget process.

## **Financial Impact**

Urban Forestry will be required to remove 32,000 street trees and 50,000 trees in parks and natural areas for a total of 82,000 City-owned trees over the next six (6) to seven (7) years. Urban Forestry previously estimated the cost of tree removal to be more than \$60 million plus an additional \$8 million to replace street trees. The EAB management costs for 2013 to 2020 have been revised to \$64 million for tree removal, wood disposal, pesticide injection and temporary staff to administer the programs, plus the costs of \$7.2 million for replacement planting, for a total of \$71.2 million. The additional costs are the result of increasing pesticide injections and the hiring of temporary staff to direct contractors and implement part of the management program. Proportionately, most of the cost is expected in the five (5) years between 2013 and 2017, totalling \$67.5 million including planting.

Urban Forestry projects that tree mortality in 2013-2015 will exceed the capacity of the arboricultural industry to provide contracted services. Accordingly, the EAB management plan has been revised to include an increased number of trees to be injected with TreeAzin <sup>TM</sup>. The expanded injection program will be implemented in order to slow the mortality of trees infested with EAB, and delay the number of removals over a longer timeframe. Projected program costs also include funding for temporary staff to assist in implementation of the program.

Costs in the first years of management (2008 to 2010) were minimal and absorbed within the Urban Forestry Operating Budgets. In 2011, Urban Forestry spent \$1.57 million on EAB management, achieved through the reallocation of resources from the Area Street Tree Maintenance program.

The 2012 implementation of the EAB Management Plan will require an estimated \$4.346 million plus planting at a cost of \$0.706 million, for a total of \$5.052 million. This will be funded by \$3.6 million in new one-time funding from the approved 2012 Operating Budget for Parks, Forestry and Recreation as well as \$.744 million from the Urban Forestry Base Operating Budget. The tree planting cost of \$0.706 million will be funded from the Urban Forestry 2012 Operating Budget (\$0.4 million), contributions from Toronto Water Operating Budget and Transportation Capital Major Road Reconstruction funding assigned to Urban Forestry annually for tree planting (\$0.306 million).

The actual costs in 2012 will be dependent on the cost of contracted services to obtain pesticide treatment and planting, the progress of tree mortality and removal, and on the ability to prepare and plan for tree replacement and pesticide injection. Financial estimates provided in this report do not include economic factors or increasing industry costs. Financial Planning will provide advice on this issue after completing analysis in the summer of 2012. As the infestation progresses, Urban Forestry will update the Budget Committee on actual costs and revised estimates of future costs for EAB management.

Below is a breakdown of estimated costs for the 2012 implementation of the EAB Management Plan.

EAB Management Plan - 2012 Implementation	Cost Estimate		
Removal of city-owned ash trees	\$ 3,426,864		
Wood Waste Disposal	\$ 27,991		
Pesticide Treatment Program	\$ 370,000		
Budget for temporary staff requirements	\$ 521,276		
Replacement of ash trees	\$ 706,000		
Total Financial Impact	\$ 5,052,131		

\*Given the uncertainty of the rate of spread and death of trees, the financials listed are cost estimates

Possible sources of funding in 2013 and beyond were identified in a Briefing Note from Financial Planning to the Budget Committee for review at their meeting of December 9, 2011. The briefing note advised that possible sources for funding include:

- 1. \$5.5 million at the end of 2012 from two programs in the Toronto Environment Office (amount was adjusted to reflect Council decisions during the Council meeting on January 17), currently not allocated;
- 2. \$43.8 million at the end of 2012, from the Toronto Energy Conservation Fund and Toronto Green Fund, and;
- 3. \$1 million per year from the Public Realm Reserve.

To date, no recommendations have been made to allocate these funds towards the EAB management plan.

Financial estimates may be revised as additional information becomes available on the spread of the EAB infestation.

The General Manager of Parks, Forestry and Recreation will provide Financial Planning with necessary information on the EAB infestation to be used in the development of a multi-year financial plan for consideration during the 2013 operating budget process.

The Deputy City Manager and Chief Financial Officer has reviewed this report and agrees with the financial impact information.

## **DECISION HISTORY**

At its meeting held on April 12 and 13, 2011, City Council adopted item PE2.1 with amendments, and among other things, authorized the General Manager, Parks, Forestry and Recreation to implement the Emerald Ash Borer Management Plan commencing in 2011.

City Council Decision Document PE2.1 http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2011.PE2.1 At its meeting of September 15, 2011, the Parks and Environment Committee requested that the General Manager of Parks, Forestry and Recreation, provide a report on how the City can help homeowners determine whether an arborist is qualified to examine, evaluate, treat and remove ash trees, which could include looking at the feasibility of providing industry training sessions and publicizing a list of those who have taken part.

Parks and Environment Decision Document PE7.2 http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2011.PE7.2

At its meeting of October 24 and 25, 2011, City Council adopted item PE8.3, requesting that the General Manager of Parks, Forestry and Recreation contact the Canadian Food Inspection Agency (CFIA) requesting that the City of Toronto enter into a service agreement to permit the City to issue removal orders for trees infected with EAB, and that residents and the City be considered eligible for compensation for the replacement of ash trees removed due to infestation by EAB.

City Council Decision Document PE8.3 http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2011.PE8.3

## **ISSUE BACKGROUND**

The EAB Management Plan was developed and initiated in 2011 in response to the expanding infestation and the City's requirement to remove trees that have died as well as to mitigate the impact on the urban forest canopy targets.

Toronto's urban forest generates \$27.5 million in environmental benefits each year and provides an ongoing value of \$31.6 million in carbon storage. Contributions made by the urban forest are further described in the 2010 report titled "Every Tree Counts" <u>http://www.toronto.ca/trees/pdfs/Every\_Tree\_Counts.pdf</u>. It is expected that Toronto will lose 860,000 ash trees over the next six (6) to seven (7) years, as well as the associated benefits of these trees. EAB has the potential to affect 8.4% or 860,000 of Toronto's trees worth an estimated \$570 million in structural value. The loss of ash trees will be particularly devastating to neighbourhoods that have predominantly ash tree canopy on the road allowance, in parks and on private property. It will take eight years to replace the number of trees removed, and decades for the canopy to be replaced.

The overall objectives of the EAB Management Plan are to mitigate the impact of EAB through tree planting in an effort to replace the tree canopy that will be lost and increase education and awareness for private landowners who face significant costs associated with tree removal and replacement.

This report provides a status update on each of the five (5) key components of the EAB Management Plan, which includes:

1. Monitoring (Survey)

- 2. Education (Communication) Plan
- 3. Pesticide Treatments
- 4. Removal of Infested Trees and
- 5. Tree Canopy Replacement

This report also provides updated information on the spread of EAB outside of the City of Toronto.

## COMMENTS

## 1. Monitoring (Survey) – Status Update

### **Branch Sampling Survey**

In 2009 and 2010, branch sampling surveys were done in parts of Scarborough and North York Districts to assess the spread of EAB infestation. At the end of 2010, based on survey results, Urban Forestry assumed all of Scarborough District and much of North York District were infested. These areas combined with the locations identified in Etobicoke-York District, would cover about 12% of the City's land mass.

The focus of the 2011 survey was to evaluate the extent of EAB in more recently infested areas of North York and Etobicoke-York Districts. Branches were collected from 800 ash trees, located in 164 plots in north-central and west Toronto. These branches were dissected to assess the presence of EAB. Results of the 2011 survey showed that infestation had increased to cover about 17% of the City's area or 157 of 923 sub-grids but this number only reflects the area assessed in 2011. Given the results of the trapping and of service requests across the city, we can generally assume that the entire City is infested to some degree.

Urban Forestry does not plan to continue the branch sampling or the insect trapping in 2012. Due to the extent of the known infestation and level of mortality across the City, further branch sample-surveys and trapping will be of little value.

The current map of EAB infestation and ash tree mortality is shown in <a href="http://www.toronto.ca/trees/pdfs/EABupdatemap.pdf">http://www.toronto.ca/trees/pdfs/EABupdatemap.pdf</a> .

### Ash Mortality Survey

Urban Forestry has predicted the mortality of ash trees in 2012 from surveys done in the fall of 2011. Based on surveys, the current projection of the number of EAB infested tree removals that will be required in 2012 is approximately 4,557 trees. In all likelihood, this number will increase as EAB will continue to kill trees throughout the 2012 growing season. Weather conditions can influence the progress of infestation, with drought or a prolonged growing season favouring faster tree decline.

## 2. Education (Communication) Plan – Status Update

## **Public Meetings**

Public meetings were held in late June 2011 in three (3) different neighbourhoods of Scarborough District. Approximately 200 people attended the meetings, many of whom were from the Guildwood neighbourhood where there is heightened interest and concern about EAB. Five (5) additional meetings were held in September 2011 in North York District, eastern Scarborough District, Etobicoke -York District and Toronto and East York District.

## Media

Councillor Norm Kelly, Toronto's designated spokesperson, has been engaged by many media organizations to speak about the issue of EAB in Toronto. In addition, Urban Forestry has responded to numerous media requests in an effort to educate the public on the infestation.

## **City Website**

The Urban Forestry webpage (EAB link), has been updated to include:

- The presentation delivered at the public meetings in June, that has been formatted for ease of reading (<u>http://www.toronto.ca/trees/pdfs/EABPresentation.pdf</u>);
- The policy for pesticide injection (<u>http://www.toronto.ca/trees/pdfs/TreeAzinInjectionPolicy.pdf</u>);
- Information about exemptions from permit requirements (<u>http://www.toronto.ca/trees/pdfs/EABPermitExemption\_ravines.pdf</u>); and
- An updated infestation map (<u>http://www.toronto.ca/trees/pdfs/EABupdatemap.pdf</u>).

## Correspondence

Under Councillor Norm Kelly's signature, letters were sent by the City Manager's office on July 6, 2011, to the Honourable Gerry Ritz, Minister of Agriculture and Agri-Food Canada and to the Honourable Linda Jeffery, Ontario Minister of Natural Resources. Each letter outlined the economic cost of the EAB Management Plan to the City of Toronto and requested a meeting to discuss possible opportunities for financial support. Discussions have occurred between staff which has resulted in offers of assistance with communication and research.

## 3. Pesticide Treatments – Status Update

Injections of TreeAzin<sup>TM</sup> are being used by the City in an effort to keep some of the healthy ash trees alive and reduce the total number of trees that would otherwise die, particularly in the years 2013 to 2015. In order for the uptake of TreeAzin<sup>TM</sup> to be successful, it needs to be applied between the months of June and August, and reapplied every two (2) years for the life of the tree or as long as protection is required. In 2011,

6

the cost of treatment by a contractor was approximately \$185 per tree. At this price or with a possible increased price in future, the long-term cost of the pesticide treatment would be high for a large number of ash trees in Toronto. An enhanced program of injection is being recommended starting in 2012 due to the limitation of available contracted services in the arboriculture industry, and the City's obligation to maintain a safe public environment. Treatment may also be desired to maintain some trees of significant value for a duration that extends after the EAB infestation passes through Toronto.

The current plan is to treat 2,000 trees in 2012, 4,000 trees in 2013, 2014 and 2015, and 2,000 trees in 2016 to 2020. Treatment with TreeAzin<sup>TM</sup> pesticide once every two (2) years will keep healthy trees alive. When injection is discontinued, the trees are expected to decline within a few years, due to re-infestation by EAB. Healthy trees will be selected for treatment based on criteria, including trees that are difficult to access and will be costly to remove, trees that are in areas that have a dominant ash canopy, and trees that are considered significant to the public realm.

The goal of the program is to reduce the number of trees that will die in the year following injection. For this reason, injections will focus on trees near the areas of greater infestation in 2012 rather than in areas where the infestation is not yet well developed. Through 2012, staff will continue to identify potential candidates for the injection program, with a goal of identifying 8,000 trees and allocating these to be injected once every two (2) years within the period of peak infestation (4,000 per year).

## 4. Removal of Infested Trees – Status Update

## **Tree Removals**

It was originally projected that Urban Forestry would remove approximately 1,350 ash trees in 2011. However, the rate of speed of the infestation was greater than anticipated and Urban Forestry removed 1,928 ash trees in 2011. It is expected that approximately 4,557 ash trees will require removal in 2012. The Ward Councillor will be notified by e-mail and residents will receive a notification card prior to tree removal.

## Wood Waste Disposal

In reviewing the estimates for ash mortality, it was determined that a wood waste disposal plan is required. The wood by-products from City tree removals fall into the following two classifications related to its disposal:

- 1. Tree branches that are chipped using a brush chipper at the time that tree maintenance/removal are being completed. These chips are taken to Solid Waste transfer stations where they are composted with leaf and yard waste.
- 2. Large tree limbs and stem wood that are tub ground by a contractor. The unit contract rate includes the disposal of the tub ground by-product.

The estimated cost of tub grinding for the ash wood waste is \$0.404 million over seven (7) years between 2013 and 2019.

At the November 22, 2011 meeting, the Parks and Environment Committee requested that Urban Forestry provide a report on the tree removal sequence, notably the course of action for removal and disposal and opportunities for cost recovery from wood sales. Urban Forestry continues to seek ways to reduce wood disposal costs including selling or giving away wood to saw mills, firewood producers or producers of energy from biomass. An Offer to Purchase is scheduled to be posted in early 2012, and Urban Forestry is consulting with the Toronto Renewable Energy Office to review other options. It is expected that more detailed information can be provided when reporting to the June 19, 2012 meeting of the Parks and Environment Committee.

## Help For Residents in Hiring a Qualified Arborist

The Parks and Environment Committee at their meeting of September 15, 2011, requested that the General Manager of Parks, Forestry and Recreation submit a report on how the City can help homeowners determine whether an arborist is qualified to examine, evaluate, treat and remove ash trees including providing industry training sessions and publicizing a list of arborist companies that have taken part.

The City of Toronto does not have the mandate or authority to set standards for the industry, or to publicize a list of arborists qualified to examine, evaluate, treat and remove ash trees based on attendance at City of Toronto training sessions. Urban Forestry will, however, ensure the private homeowners are aware of the following information through communication documents, such as the following links on the City's website:

- (a) Understanding the services available from tree service companies through publications from the International Society of Arboriculture
  - Why Hire an Arborist? <u>http://www.treesaregood.com/treecare/hire\_arborist.aspx;</u>
  - Take Precautions When Hiring Tree Services to Help With Storm Clean-Up http://www.treesaregood.com/pressrelease/press/hiringprecautions.aspx;
  - Why hire an Arborist? <u>http://www.isa-</u> arbor.com/publicOutreach/whyHireCertifiedArborist/index.aspx
- (b) In public presentations, residents have been and will continue to be encouraged to hire a qualified arborist for any tree work or advice that they require. Arborists may be qualified by training through the Ministry of Training of Colleges and Universities (MTCU, formerly OTAB), or examination through the International Society of Arboriculture (ISA), or the American Society of Consulting Arborists (ASCA). Certification requires that members continually upgrade their education every year in order to retain their certification. In addition, homeowners will be told to obtain multiple quotes for any required work; to ensure that any company

working on their behalf has appropriate levels of liability insurance; and to ask for references.

Urban Forestry is presently working with the Ontario Ministry of Natural Resources and members of the Ontario Commercial Arborists Association to produce a free brochure to be made available online, through 311 and to Councillor's offices, to outline what homeowners should be looking for when hiring an arborist or tree care company. Provincial funding has been set aside and a partnership with York Region has been established to complete this brochure before spring 2012.

## 5. Tree Canopy Replacement – Status Update

Replacement planting for the 34 EAB infested ash trees that were removed in 2010 was completed in the spring of 2011. Additionally, 285 trees were planted in the fall of 2011 to replace a portion of those trees removed in 2011. The remaining 1643 replacement trees will be planted in 2012. An additional 1181 trees will be planted in the fall of 2012, to replace a portion of the trees removed in 2012. Funding sources in 2012 include the Urban Forestry operating budget, reserve funds from the land acquisition reserve fund that were directed to be used for tree planting, and Transportation Services capital funds where road reconstruction projects overlap with the ash mortality. In future years, Urban Forestry will plan to use funding allocated within the EAB management budget to replace street trees, supplemented by other funding sources for replacement of park trees.

Urban Forestry proposes to proactively replace trees in 2012-2013, but expect that by 2014 the numbers of replacement trees required will be too high to achieve in the year following removal. There will be an expected replacement planting service delay of up to two (2) years until 2017, after which the delay could be reduced to one (1) year. Urban Forestry anticipates that public and private demand for contracted services will limit available nursery stock and resources for planting trees. Street tree replacement will be a priority. Parks are being evaluated based on the need for canopy replacement and potential for natural regeneration. It is anticipated that park tree replacement will be implemented using existing funding sources, with larger numbers of trees being replaced after 2017.

The cost to replace commercial trees planted in sidewalk inserts or above grade planters will vary but will exceed the cost to replace trees in turf areas. There are approximately 13,800 commercial trees in Urban Forestry's computerized inventory, of which about 4,000 are ash trees. Of these, about 1,500 are located within Business Improvement Areas (BIAs). Urban Forestry continues to update the asset information to recommend a management plan specifically for these trees. Consultation with BIAs will follow to outline a plan to manage commercial ash trees which will include expanded pesticide injection to protect some of these trees and a strategic replacement plan for others.

The cost to replace park trees that are removed as a result of EAB infestation is not yet well defined and a financial estimate cannot be provided at this time. The current projection is that 50,000 ash trees in parks will require removal or mitigation by 2020.

9

The pesticide injection plan is expected to reduce the number of trees to be removed to 43,000. The current asset inventory system does not identify many of the trees located in parks, therefore it is difficult to determine the impacts to natural areas, forests and manicured parklands. In general, the impact to all parks will be greatest where ash form a dominant part of the overall canopy. Unless tree replacement is actively managed, the ash component of natural forests such as those in Guildwood Park, Rouge Community Park and Centennial Park, will be replaced by self-seeded invasive species like European buckthorn, Norway maple and Manitoba maple, leading to degradation of the natural heritage and ecosystem of those forests. In many manicured parks such as Elizabeth Simcoe Park, Bridlewood Park and Spenvalley Park, the loss of ash trees will result in a significant reduction in canopy cover.

### **Summary of EAB Management Plan**

The overall EAB management plan for years 2011 to 2017 is summarized in the table below. If the infestation progresses as expected, the current backlog of tree service would be increased in the years 2014 to 2016, leaving a large number of dead trees in parks standing for up to 12 months. Urban Forestry will develop a plan to strategically manage tree removals to mitigate public risk.

	2011	<b>20</b> 12	2013	2014	2015	2016	2017	Total
Street tree (ash) mortality	1773	3332	8000	9400	7300	2195	0	32000
Park tree (ash) mortality	155	1225	6343	11018	14632	7581	2046	43000
Trees injected with pesticide	203	2000	4000	4000	4000	2000	2000	8000*
Tree mortality (ash) after pesticide injection	1928	4557	14343	20418	21932	9776	2046	75000
Trees (ash) affected by a 12 month backlog			0	6068	13650	9076	0	28784
Tree (ash) removal in parks and on streets	1928	4557	14343	14350	14350	14350	11122	75000
Trees (ash) to be tub ground	1889	4251	12757	17664	18274	7881	1535	64250
Street tree planting	285	2824	3234	6700	6700	6700	5557	32000
Cost (\$ millions)	1.57	5.05	13.58	14.46	14.46	14.03	11.01	74.16

\*total of 8000 trees will be injected – some trees will be injected up to 3 times over the course of infestation in Toronto

At their meeting of September 26 and 27, 2011, City Council adopted a recommendation that the General Manager of Parks, Forestry and Recreation review the forestry service plan, and report to the Parks and Environment Committee with recommended changes to extend the timeframe to achieve the City's tree canopy goals. A report is being prepared for the April 20, 2012 Parks and Environment Committee. This report will consider the overall impact of increased ash tree removals and replacement planting on the forestry service plan.

## Canadian Food Inspection Agency (CFIA) Forest Pest Compensation Regulations on Replacement Grants for EAB

At the direction of the Parks and Environment Committee, a letter was sent to CFIA requesting that the City of Toronto enter into a service agreement to permit the City to issue removal orders for trees infected with EAB, and that residents and the City be considered eligible for compensation for the replacement of ash trees removed due to infestation by EAB. CFIA has responded (Attachment 1), noting that removing infested host trees is not a viable management option, and therefore no orders for tree removal will be issued. As a result of this policy decision at the federal level, neither residents nor the City qualify for compensation. CFIA may still issue a Notice to dispose and order trees to be removed within regulated areas for the purpose of supporting research.

## Latest Information on EAB Infestation outside Toronto

EAB continues to spread in Ontario and Quebec, with recent positive identifications made in Montreal and Gatineau, Quebec, in areas outside of the existing regulated area. EAB was first found in the City of London during the fall of 2006 and is now spread across London. Other municipalities in Ontario are actively planning for EAB management and are expected to compete for available contracted services in future years.

In the USA, EAB has spread to 15 states, stretching from Maryland and Pennsylvania on the eastern seaboard, south to Tennessee and west to Missouri, Iowa and Minnesota. The U.S. Department of Agriculture currently is testing a variety of control methods including spreading a fungal pathogen that would kill the beetle, and releasing three species of non stinging parasitic wasps that lay their eggs in the ash borer larvae. The City of Toronto, Urban Forestry will be closely monitoring the result of these tests.

### **Responding to the EAB Challenge**

Toronto's forests have survived the impacts of many other introduced pests, but EAB will impact a greater percentage of trees in a much shorter period of time compared to Dutch elm disease, chestnut blight and other past pest introductions. This is happening at a time when the urban forest is more stressed than ever before and when our dependence on the forest to mitigate urban heat island effects and climate change has increased. If the urban forest is to be sustainable in future and provide all the known benefits, it is vitally important that Toronto continue programs that maintain diversity of tree species and actively care for and manage trees and the greater urban forest.

Financial estimates provided in this report have been calculated using the data that is currently available and do not include economic factors or increase to industry costs for future years. The estimates will be refined as more information becomes available and as actual costs are incurred. The General Manager of Parks, Forestry and Recreation will update the Deputy City Manager and Chief Financial Officer as well as Budget Committee annually on funding expenditures and projected requirements based on actual program delivery.

## CONTACT

Jason Doyle, Director, Urban Forestry, Tel: 416 392-1894, Fax: 416 338-2434, Email: jcdoyle@toronto.ca

## SIGNATURE

Jim Hart, General Manager of Parks, Forestry and Recreation

## ATTACHMENTS

Attachment 1 - Letter of response from the Canadian Food Inspection Agency

Canadian Food Agence canadienne Inspection Agency d'inspection des aliments

Office of the Chief Plant Officer Plant Health and Biosecurity Directorate 59 Camelot Drive Ottawa, Ontario K1A 0Y9

DEC 2 2 2011

Mr. Jim Hart General Manager Parks, Forestry & Recreation Division Toronto City Hall, 4<sup>th</sup> Floor, West Tower 100 Queen Street West Toronto, Ontario M5H 2N2

Dear Mr. Hart,

Thank you for your letter dated November 22, 2011, to Mr. Marcel Dawson, National Manager, regarding the Member Motion MM11.10 adopted by the City Council at their meeting of October 24<sup>th</sup>, and 25, 2011. I appreciate being made aware of the concerns of the City of Toronto.

When the emerald ash borer (EAB) was first detected in Canada, the Canadian Food Inspection Agency (CFIA)'s control measures included cutting down infested trees. Since then, however, it was determined that removing infested host trees would not be a management option for the CFIA. From a national perspective, ash tree removal would not change the likelihood of EAB spreading to other non-infested areas because of the possibility of people moving infested firewood and the fact that there may already be EAB in some areas, but they just have not been discovered due to the cryptic nature of initial infestations and the time required for ash trees to develop symptoms. The CFIA's response to EAB is now focussing on regulation and enforcement of movement of ash materials and firewood, surveillance to detect the pest's spread and distribution, communication, and public outreach. The CFIA also supports continued research, through the Canadian Forest Service, on the insect's biology, life cycle and possible biological control.

To be eligible for compensation under the amended *Introduced Forest Pest Compensation Regulations* a person must receive a Notice to dispose. However, Notices to dispose are issued only when the removal of trees serves a special purpose. For example, Notices to dispose were issued to property owners that had their ash trees removed for the creation of an ash-free zone in southwestern Ontario. Notices to dispose have also been issued for research purposes in the early days of EAB, when the size of the infested areas, and thus the availability of infested trees, was limited.

.../2

## Canada

-2-

The CFIA may still issue a Notice to dispose and order trees to be removed within regulated areas for the purpose of supporting research. In all other cases, it is the responsibility of tree owners who want to have their infested trees removed to cover all the costs associated with the removal.

The CFIA recognizes that the environmental and financial impact of EAB is significant for affected municipalities and homeowners. Continued collaborative effort and co-operation of all partners are essential to protect Canada's valuable forest resources.

Sincerely,

Greg Stubbings Chief Plant Health Officer/Director, Forestry