Outlook

Wake Robin Proposal Public Hearing Comment

From Christian Allyn Invasive Plant Solutions <nomoreinvasiveplants@gmail.com>
Date Tue 9/9/2025 9:29 AM
To Land Use <landuse@salisburyct.us>

To the Salisbury Planning and Zoning Commission,

At the request of Salisbury resident Kerry Noble, and echoing concerns of the Salisbury Conservation Commission and other interested parties within your town, I write to you concerning Japanese Knotweed infestation at your Municipal Sewer Treatment Facility on Walton Street as it relates to any possible expansion or alteration due to the Wake Robin Inn proposal.

The Town of Salisbury Sewer Treatment Facility is surrounded on three sides by one of the largest Japanese Knotweed patches in the Housatonic River Commission's region. This patch is encroaching onto the hard infrastructure of the sewer plant including its pools, pipes and outflows. Any disturbance to this patch, other than proper remedial treatment, risks increasing the severity of the infestation. Worse, any expansion of the Sewer Treatment Facility done before a fully executed remedial treatment risks exposing the new expansion to be built on soil contaminated by Japanese Knotweed.

Japanese Knotweed is an invasive plant which is capable of destroying underground infrastructure. Japanese Knotweed roots, with their depth of 15 feet, rely on turgor pressure which is water pressure within the plant to maintain structure. These roots' extreme turgor pressure, can push against asphalt, concrete, pipes and metal, inevitably leading the roots to push

against and through these materials at any weak point. These roots can also dislodge the soil leading to erosion. This erosion allows for the proliferation of Japanese Knotweed. Japanese Knotweed primarily spreads through underground rhizomes which expand the existing patch. The secondary mode of propagation is clonal. Any living piece of Japanese Knotweed as small as one millimeter can grow a new plant. When plants in eroding soil inevitably get dislodged the broken propagules will create new Japanese Knotweed plants. Thus, it is important to properly treat a site before any new building occurs.

The difficult issue becomes how the remediation must be done. A Glyphosate based herbicide must be either foliar sprayed upon or injected into a Japanese Knotweed plant between the end of flowering in September and first frost, typically in October for at least 3-5 years. After these repeated treatments 1% of Japanese Knotweed left on site
a general maintenance phase begins.
New expansion or building can be done at this point. The infestation must continue to be treated annually until there are ten consecutive years where there is no Japanese Knotweed on site. This method constitutes proper treatment.

In the late 2010s, the Housatonic River commission among other interested parties began mapping infestations within the members of those river commissions. This effort of mapping was done to coordinate treatment efforts of Japanese Knotweed within participating towns, including Salisbury. Towns such as North Canaan, Canaan/Falls Village and Cornwall have executed treatment on town property with excellent results. These towns utilized the experience of licensed applicators, including myself, based on the research gathered by Tom Zetterstrom, who is recognized by the Connecticut Invasive Plant Working Group for his dedicated work towards

development of proper invasive plant management practices. The best management practice is the limited, judicious and most importantly, a properly timed treatment of Japanese Knotweed with the correct herbicide. There is no other way to remove Japanese Knotweed, at scale, than with the use of herbicide.

It would be incredibly costly to the taxpayers of the Town of Salisbury to risk expanding or altering the existing Sever Treatment Facility without remediating the Japanese Knotweed infestation. With the size of the existing infestation treatment costs would be approximately $30,000 in the first year, and approximately $60,000 for the lifetime of treatment. If the Japanese Knotweed infestation were to be left alone, or worse, disturbed, future treatment costs can well exceed $100,000 for first year treatment, as well as risk damaging existing necessary components of the Sewer Plant.

It is my professional opinion that I recommend the following:

1. The Town of Salisbury budget for and execute proper treatment of the Japanese Knotweed infestation at the Sewer Treatment Facility.

2. This infestation be placed at the highest priority for treatment above all other infestations of other invasive plants on town property.

3. No alteration or expansion of the Sewer Treatment Facility should occur within 3 seasons of proper treatment.

I thank the Salisbury Planning and Zoning Commission for allowing the opportunity to submit these concerns.

Thanks,
Christian Allyn

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