

## Comments on the proposed Grey-Highlands Zoning Bylaw



June 27, 2025

Dear Members of Council, Senior Staff, and the Planning Department,

The OHI congratulates Grey-Highland for a nicely updated Zoning Bylaw and the facilitation of Ashley Bilodeau in Thursday's virtual meeting, attended by the undersigned.

As you will be aware, I do not reside in the municipality, but deputed as the OHI is an organization that promotes watershed security throughout Ontario, deputed previously on local stormwater management issues, and as we are all impacted as water flows across boundaries.

Our concern on this draft bylaw is the proposed reduction in the setback for wetlands from 120 meters to 30 meters. Our concerns include that:

- The reduction in the setback lacks any scientific basis, and indeed runs counter to the science that established the 120 m setback forty years ago;
- While the Province may wish to ignore and reduce the historically recommended 120 m setback in the Ontario Natural Heritage Reference Manual, numerous other credible studies and science-based guidelines, such as Canada's How Much Habitat is Enough, replicate the 120 m buffer;
- Turtles, which inhabit wetlands, and of which every species in Ontario is endangered, along with numerous other species such as of salamanders, will not respect the 30 m buffer, but will range much further in search of mates and places to lay their eggs. Denying them adequate buffers and migration corridors will extirpate those species, regardless of any claims of protection in a 30 m buffer;
- Groundwater, flowing into and from a wetland, will not respect the 30 m buffer;
- Reducing the buffer might severely limit the prospect of linked natural heritage corridors, the use of the broader buffer as a location for nature-based solutions to the climate and biodiversity crises, and prevent the creative alignment of trails; and,
- It appears to us that the reduction of the buffer will violate commitments in your Municipal Strategic Plan both to "Prioritize the stewardship of our lakes, rivers, and natural environment...", and to "Adopt an environmentally conscious mindset for all municipal undertakings."

In addition, having deputed at Committee of the Whole on the need for a master stormwater plan, and having listened to councilors and staff express support for the concept that Grey Highlands has significant natural heritage that it values and that it should seek be a model for sound regional environmental policies and practices, the OHI finds that the proposed reduction in the wetland buffer is headed exactly the wrong way. We urge Council to provide the needed direction to staff and consultants so that this type of retrenchment does not occur again.

Finally, we share overleaf a copy of an e-mail the OHI sent out recently, updating recipients on a core aspect of part of our message at the meeting of Committee of the Whole. Rather than pursue a complex set of documents with 26 recommendations, we have re-focused our efforts on a one-page paper with 9 recommendations, called Watershed Security for Municipalities: The Need to Integrate Land Use and Watershed Planning. We look forward to updating Council in the near future.

Sincerely,

Andrew McCammon  
Executive Director

Water is Life.  
Let's act like it

**The Ontario Headwaters Institute**  
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## **Watershed Security for Municipalities: The Need to Integrate Land Use and Watershed Planning**

OHI E-mail of June 25, 2025

The OHI extends our full appreciation to organizations and individuals seeking to un-do the recent reductions in environmental safeguards and Ontarian's legal and democratic processes under Bills 5 and 17, as well as to community groups opposed to the impact that Strong Mayor powers is having on local decision-making and accountability.

Regardless of the result of these important discussions, we believe that the key to protecting Ontario's watersheds is to shift away from what has become a diluted and fragmented approach to watershed management to an outcomes-based framework for watershed security, which we define as healthy and resilient watersheds that protect regional ecological integrity, social wellbeing, and economic vitality.

While the Province needs to stop sacrificing environmental safeguards and watershed security to facilitate actions to address the housing crisis, we suggest that the most positive future direction to protect our water, maintain democracy, and address the housing crisis would be to integrate land use and watershed planning at the municipal level.

**We are therefore pleased to announce that we have re-focused our extensive suite of positions papers from April, with their 26 recommendations, to a one-pager with nine recommendations, which you can see here – [Watershed Security for Municipalities the Need to Integrate Land Use and Watershed Planning June 25 2025](#)**

Over the next few months, we will be sharing this widely, making presentations, and working to develop a toolkit for municipalities.

Please contact us via andrew at ontarioheadwaters dot ca for more information, and to sign up for our newsletter to be kept in the loop.

Andrew McCammon  
Executive Director