

To City of Brampton Clerk

From Lorraine Johnson, [REDACTED]  
[REDACTED]

March 18, 2025

Re: New Ground Cover Maintenance and Prohibited Plants By-law, Committee of Council meeting, March 19, 2025

Many thanks for the opportunity to offer my comments on the proposed revisions to the Ground Cover Maintenance and Prohibited Plants By-law.

To provide a bit of context for my comments, I've been writing books about naturalization and gardening with native plants for more than thirty years (e.g., *The New Ontario Naturalized Garden*; *100 Easy-to-Grow Native Plants for Canadian Gardens*; *Grow Wild!*; *A Garden for the Rusty-Patched Bumblebee*, among other books), and for that time, I've also been closely involved in efforts to reform grass and weeds bylaws across Canada. This past summer, I co-launched a national campaign for bylaw reform with the Canadian Wildlife Federation, Canadian Society of Landscape Architects, David Suzuki Foundation and the Ecological Design Lab. And recently, I was one of the Subject Matter Experts invited by the City of Toronto to advise on the revisions to Toronto's Turfgrass and Prohibited Plants bylaw.

As someone with long-standing experience and expertise on bylaw reform, I'd like to commend City Council for undertaking the work of updating the bylaw, and I'd like to commend City staff for their excellent report.

I would like to suggest 3 tweaks to the proposed bylaw. These tweaks would, in my opinion, help to make Brampton's new bylaw one of the best in Canada.

- 1) Hundreds of ground cover plants (both native and non-native) that are planted by gardeners grow taller than 20cm. The proposed bylaw would restrict these plants. I would suggest that instead of prohibiting "ground cover" higher than 20cm that the bylaw prohibit "turfgrass grown for lawns" higher than 20cm. This is the route taken by the City of Toronto and also Prince Edward County in their recent bylaw updates. (This

would entail changing the proposed name of the bylaw, as well, to something such as “Turfgrass Maintenance and Prohibited Plants By-law.”

- 2) Instead of referring to “native” habitat, I would suggest referring to “naturalized” habitat. Almost no gardeners have an entirely native plant garden, which means most naturalized gardens would not be protected by the bylaw’s definition of what a “garden” is.
- 3) I urge you to remove the references to “unreasonably overgrown” under the General section, item #7. This phrase is vague, arbitrary, and is the terminology ruled “void for vagueness” in the Sandy Bell court decision over her naturalized garden.

Many thanks for considering these points. And again, my wholehearted congratulations on leading the way with Brampton’s update on this bylaw.

Lorraine Johnson