November 16, 2023

# A1: Amendment Referral Report

## RE: PROPOSED Niagara Escarpment Plan Amendment PC 225 22

## On-farm Diversified Uses and Agricultural-related Uses in Escarpment Protection Area, and other agricultural-related policy housekeeping matters.

### Executive Summary

On November 16, 2022, the Commission endorsed proceeding with public consultation on a proposed Niagara Escarpment Plan amendment (plan-wide) that would broaden permitted agricultural uses within the Escarpment. NEC staff circulated the proposal on the Environmental Registry, through direct email, and through newspaper ads. Twenty-one written objections were received on the proposal and therefore, per Section 10(3) of the Niagara Escarpment Planning and Development Act (NEPDA), NEC staff are seeking the Commission’s endorsement to refer the amendment to the Ontario Land Tribunal.

### Proposed Amendment

The proposal is to amend the Niagara Escarpment Plan (NEP) to allow the opportunity for the development of on-farm diversified uses and agricultural-related uses outside of prime agricultural areas by amending the Escarpment Protection Area Permitted Uses to be the same as those of the Escarpment Rural Area policy, and; to amend the NEP Part 2.7 policies respecting Development Affecting Natural Heritage to recognize that the development of certain agricultural uses may be compatible in Key Natural Heritage Features (KNHF), under certain conditions. Additionally, to undertake a housekeeping-related amendment to Part 1, Escarpment Natural Area Permitted Uses, to better align R.R.O. 1990, Regulation 828 exemptions respecting a specific agricultural use with the Permitted Uses of the NEP.

### Background

The updated Niagara Escarpment Plan, released in 2017, included new and updated agricultural policies related to agriculture, including the addition of on-farm diversified uses and agricultural related uses as permitted uses. These additional permitted uses were included for the Escarpment Rural and Escarpment Recreation Area land use designations. These additional permitted uses were also included in the Escarpment Protection Area land use designation but only within prime agricultural areas.

Farmers and agricultural organizations have indicated that limiting these additional uses to only prime agricultural areas in Escarpment Protection were not sufficient to allow for sustainable farm operations and that the changes did not reflect the full range of policy considerations suggested by the community during and following the consolidated plan review. The industry has since been petitioning the Commission to consider a further expansion of permitted uses as they relate to agricultural, agricultural-related and on-farm diversified uses. The Commission has supported such consideration and directed staff to bring information and proposals forward for consideration.

At their meeting on November 17, 2021, the Commission directed staff:

1. To proceed with initiating a Niagara Escarpment Plan amendment to address the following:
   * Part 1.4.3.2 Escarpment Protection Area on-farm diversified uses and agriculture-related uses in prime agricultural areas.
   * Agricultural uses within Earth Science Areas of Natural and Scientific Interest.
2. To undertake further analysis of additional agricultural policy topic areas, for potential consideration in the scoping of a proposed Plan amendment:
   * Part 2.8 winery policies
   * Agricultural uses in key natural heritage features
   * Supporting the Agricultural System in the NEP Area

On November 16, 2022, staff brought forward a proposal for a scoped amendment that would address some of the concerns expressed by the agricultural community, which the Commission endorsed. Staff and the Commission recognised that the scoped proposal did not reflect or address the full extent of the agricultural policy amendments that key agricultural stakeholders had sought, however, noted that additional topic areas will continue to be discussed and given appropriate consideration, including with ministry partners and a broader range of agriculture stakeholders. Staff also identified that some of the changes being requested by the agricultural community are regulatory in nature and cannot be dealt with through an amendment to the NEP (e.g., events) or may be more appropriately dealt with through the next formal plan review.

Specifically, the proposal is to amend the Niagara Escarpment Plan as follows:

#### Part 1 Land Use Policies is amended by adding the following Permitted Use under Part 1.3.3 Permitted Uses of the Escarpment Natural Area designation:

15. Maple sugar harvesting (for greater certainty, this includes the tapping of trees, and collection of sap, and does not include the development of buildings or facilities related to maple syrup production).

#### Part 1 Land Use Policies Permitted Use Part 1.4.3 Escarpment Protection Area, Permitted Use 3 is amended as follows:

2. Agriculture-related uses and on-farm diversified uses.~~, in~~ *~~prime agricultural areas~~*

#### Part 2.7 Development Affecting Natural Heritage is amended by adding a new subsection 2.7.2 which shall read:

2.7.2 f) Expansions to Existing uses that are Agricultural uses, agricultural-related uses and on-farm diversified uses outside of wetlands, provided there is no alternative and the expansion or alteration in the feature is minimized and where possible, temporary.

#### Part 2.7 Development Affecting Natural Heritage is amended by adding a new sub-section as follows:

Notwithstanding Part 2.7.2, *Agricultural uses, agricultural-related uses, and on-farm diversified uses* may be permitted in Earth Science Areas of Natural and Scientific Interest, which is not also identified as any other Key Natural Heritage Feature, provided it has been demonstrated that the earth science values can be maintained and protected. Planning, design, and construction practices shall be identified that will keep disturbance to landform character to a minimum and ensure the protection of the geological or geomorphological attributes.

#### The following definition is added to Appendix 2 Definitions:

Earth Science Values:values that relate to the geological, soil, and landform features of the environment.

### Public, Agency and Indigenous Consultation

Consultation on the proposed amendment was conducted by direct email to Inidgenous communities, municipalities, agencies, agricultural organizations and provincial ministries; ads placed in major newspapers throughout the Niagara Escarpment Plan area; and a notice published on the Environmental Registry (ERO). The ERO notice was published on February 6, 2023, with a 64 day comment period closing on April 11, 2023. Direct emails and newspaper ads also provided for a minimum 60 day comment period.

On August 30, 2023, the proposal was also presented to the Public Interest Advisiory Committee (PIAC), a committee established by the Minister pursuant to section 4(1) of the NEPDA to make recommendations to the NEC and the Minister on amendments proposed to the NEP. PIAC’s recommendations must be considered by the NEC, hearing officers and the Minister when a decision is being made.

### Results of Consultation:

A total of 40 comments were received directly by the NEC, with an additional twelve comments received through the Environmental Registry (although six of those were duplicates of comments received directly). Comments were received from ministries, municipalities, agricultural groups, not for profit organizations and individuals as well as one conservation authority and one Indigenous community. A breakdown of the number of comments and general indication of support/opposition is as follows (a more detailed summary of comments is provided in Appendix 1):

* 3 Ministries (MECP, MCM, OMAFRA). General support, some recommendations for refinements
* 10 Municipal/Regional governments. General support with some concerns related to 2.7.2f allowing for extension of existing *uses* vs existing *structures* as permitted by the Greenbelt Plan and the Growth Plan. In addition, some recommendations for enhancements or additional policy consideration
* Historic Saugeen Metis. No concerns
* 1 Conservation Authority - Toronto and Region Conservation Authority (TRCA). Indicated that the proposed amendments may benefit from being specific to sections 2.2.2 and 2.7.5 to ensure that development will be directed away from natural hazards in accordance with provincial and TRCA policies.
* 4 Farming organizations (Ontario Federation of Agriculture, Ontario Craft Wineries, Hamilton-Wentworth Federation of Agriculture, Golden Horseshoe Food and Farming Alliance). Generally supportive except for Ontario Craft Wineries who noted that the proposed amendment does not include a number of changes requested by their organization.
* Coalition on the Niagara Escarpment (CONE). Expressed questions and concerns but not opposition.
* Preserve the Escarpment. Opposed.
* 31 comments from individuals; 21 opposed, 8 in support, 2 undetermined.

All the specific objections from individuals appear to be concerned with the expansion of OFDU’s and ARU’s within non-prime agricultural lands in Escarpment Protection Areas. In addition, it appears that these individual objectors are connected under the Preserve the Escarpment group, which was established to oppose a specific Development Permit Application (DPA) approved by the Commission to allow for OFDU’s on a lavender farm within the Escarpment Protection Area but outside of prime agricultural lands. That approval was appealed on the basis that it did not meet policy and was referred to the OLT. A final decision is pending by the Minister. Should this amendment be approved, then that specific proposal would be a permitted use.

#### Public Interest Advisory Committee:

At the August 30, 2023, PIAC meeting, members were briefed on the proposal and provided with a summary of Indigenous, agency and public comments.

After discussion on the matter, PIAC passed the following motion (all in favour):

That PIAC supports the agricultural amendments generally with specific comments on each of the 5 specific amendments as follows:

* Re: Part 1.3.3.15 Maple sugar harvesting. PIAC supports the proposal but suggests that it be broadened to allow for minor structures and equipment for the collection (not production) of sap to be permitted.
* Re: Part 1.4.3.3 – Enabling ARU and OFDU outside prime agricultural land within Escarpment Protection Area. PIAC supports expansion of OFDU/ARU outside of prime agricultural areas so long as it meets other policies of the NEP including environmental and visual considerations (subject to Part 2).
* Re: Part 2.7.2f – Expansion of agricultural, agricultural-related and on-farm diversified uses in KNHF. PIAC recommends that the proposal be aligned with the greenbelt plan and not include expanded "uses".
* Re: Part 2.7 – Earth Science ANSI. PIAC supports this proposal but feel that the NEC should provide technical guidance on the planning, design and construction practices.
* Re: New Definition – Earth Science Values. PIAC has no concerns with the new definition being added to the plan.

### Hearing

As directed by the Commission at the November 2022 meeting, the proposed NEP amendments in this report were prepared by staff and circulated for comments through the normal public consultation process. NEC staff are not providing a recommendation to the Commission on the proposed amendments at this time.

As set out above there are written objections to some of the proposed NEP amendments. Where there are objections the NEPDA requires the NEC to refer the proposed amendment to a hearing, which occurs before the Ontario Land Tribunal (“OLT”).

At the conclusion of the hearing the OLT issues a written recommendation about the proposed NEP amendment to the Commission for its consideration. The Commission then considers the OLT recommendation and previous public and agency comments before the Commission makes a recommendation about the proposed amendment to the Minister.

### Recommendations:

That the Commission direct NEC staff and counsel to:

1. Refer the proposed NEP amendments to the OLT for a hearing;
2. Seek party status for the NEC in the OLT hearing;
3. Undertake discussions with the parties to the hearing to:
   1. identify the proposed NEP amendments that they do not object to, in order to potentially seek to advance the approval of those non-contentious amendments; and,
   2. identify the proposed NEP amendments that they object to, to confirm the scope the dispute, and to potentially engage in discussions between the parties to determine if they are able to arrive at a consensus position on these policies.
4. Report back to the Commission for instructions prior to the NEC taking a position in the hearing on the NEP amendments.

### Prepared by:

*Original signed by:*

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Sandy Dobbyn

A/Senior Strategic Advisor

### Approved by:

*Original signed by:*

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Kathy Woeller

Director

### Attachments:

## Appendix 1: Summary of Agency, Indigenous and Public Comments Received

## APPENDIX 1

### Summary of Agency, Indigenous and Public Comments Received

Ministry of the Environment, Conservation and Parks (MECP)

* + No comment or concerns.

Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA)

* + OMAFRA staff applaud the NEC’s consideration of proposed amendments to the NEP to address targeted areas that support agriculture where it meets the purpose and objectives of the plan.
  + OMAFRA recommends that the NEC consider permitting small scale maple processing facilities as an accessory use if it meets certain conditions (e.g., only in existing buildings or structures).
  + Wrt 1.4.3, OMAFRA staff support this amendment as it provides economic opportunities on rural lands as well as prime agricultural areas that will help with sector viability.
  + Wrt 2.7.2f, OMAFRA staff supports the proposed amendment but would prefer that the NEP policy fully harmonize with Greenbelt Plan Policy.
  + Wrt earth science ANSI’s, OMAFRA supports the proposed amendment and urges the NEC to ensure that studies only be required if the Earth Science feature is threatened by the agricultural, agriculture-related or on-farm diversified use.
  + OMAFRA also included a number of suggestions for consideration within future amendments to further support the agricultural sector.

Ministry of Citizenship and Multiculturalism (MCM)

* + MCM has no specific comments related to compliance with the Ontario Heritage Act or the cultural heritage policies of the PPS or the NEP.
  + MCM does note, that the proposed amendments would increase the area on which certain agriculture-related buildings and structures may be built that would be exempt from the development permit system pursuit to R.R.O. 1990. Regulation 828.
  + This will in turn, expose more lands with archaeological potential to ground-disturbing activities without a regulatory trigger for archaeological assessment.
* 10 Municipal/Regional governments provided comment. General support with some concerns related to 2.7.2f allowing for extension of existing *uses* vs existing *structures* as permitted by the GBP and GP. In addition, some recommendations for enhancements or additional policy consideration.

Township of Mulmur

* + The Township supports the amendment to allow OFDU on both prime and non-prime agricultural lands.
  + The Township recommends that the NEP extends the Agricultural Systems Mapping to more clearly designate prime and non-prime agricultural lands within the Niagara Escarpment Plan area.

Town of Grimsby

* + Suggest clarification that an accessory building (e.g., shed) would be permitted for the storage of tapping and collection equipment on-site.
  + Support changes to 1.4.3 to extend ARU and OFDU in non prime agricultural areas, but if the amendment does not proceed, request that NEC prepare mapping to clearly delineate prime and non-prime agricultural lands.
  + 2.7.2f) Staff request clarification on whether all wetlands would continue to be included as KNHF and request clarification on the “temporary” portion of the proposed language.
  + Re: ES ANSI, staff support but request clarification on the “planning, design and construction practices” referenced in the proposed language and whether or not the NEC will be developing guidance materials in that regard.

Town of Caledon

* + Supports the expansion of ARU and OFDU in the EPA and request that the ORMCP also follow suit.
  + Staff generally support changes that would harmonize the NEP agricultural policies with those in the PPS, Growth Plan and Greenbelt Plan (particularly wrt 2.7.2f).
  + Request that small-scale ancillary structures be permitted within the ENA to house equipment related to maple sap collection.
  + Town of the Blue Mountains
  + Support the expansion of ARU and ODFU outside of prime agricultural areas
  + Find the proposal to expand agricultural uses in KNHF provided there are no negative impacts as consistent with their OP
  + Have no other concerns.

City of Burlington

* + Identify no concerns with the proposed amendment for sap collection but identify that it likely is not sufficient to support a commercially viable operation as additional infrastructure including ATV trails, vacuum pump structures etc. would not be permitted and suggest that the amendment be modified to allow these.
  + Fully support expansion of ARU and OFDU in non-prime agricultural areas.
  + Concern that enabling expansion of agricultural *uses* and not just structures as in GBP, GP and seek clarification as to why this is proposed and why these expanded uses are not dealt with through NEP section 2.3 (existing uses). Generally concerned that this will enable *new* agricultural uses in KNHF. Suggest best vehicle for this amendment is through consolidated review.
  + Additionally suggest consideration to removal of winery-specific policies in favour of treating them as ARU and OFDU.

Halton Region

* + Staff are pleased to see the proposal to extend ARU/OFDU outside of prime agricultural areas.
  + Staff are not supportive of extending existing agricultural *uses* within KNHF and suggest the amendment to modified to be consistent with the Greenbelt Plan.
  + Staff do support enabling agriculture within ES ANSI’s
  + Staff support the updates to support maple sap collection in the ENA.

Town of Milton

* + Town staff are satisfied that the proposed changes are generally consistent with the policies of the GB plan and that the proposed policies will support agricultural operations and the rural economy while protecting the natural heritage area.
  + Staff do, however, recommend that NEC consider using the language from the Greenbelt Plan to avoid potential misinterpretation.
  + Staff also confirm that the amendments will not create a conflict with the Town of Milton Official Plan.

Niagara-on-the-Lake

* + The Town of Niagara-on-the-lake appreciates the Provinces' commitment to refining and strengthening the framework for agriculture, and the opportunities for OFDU and ARU within the NEP area. Staff have no concerns with extending these uses into non-prime agricultural lands.
  + Staff support changes to confirm that maple sugar harvesting may occur in the ENA.
  + The Town’s adopted OP policies would not permit the expansion of existing uses within most of the KNHF of the NEP. The town recommends additional wording be provided to require an EIS or other study to ensure that the impact(s) of an expanding existing use within a KNHF is minimized.
  + With respect to agricultural development within ES ANSIs, the town would like additional information to clarify and implement the requirement to keep disturbance to the ES feature to a minimum.

Region of Peel

* + The Region supports expanded permission for ARU and OFDU in Escarpment Protection Area.
  + Region staff suggest that the maple sap collection allowance be expanded to allow for small scale ancillary structures to house equipment that may be required for components to the collection system.
  + With respect to 2.7.2f, the Region supports the ability to consider expansion of existing agricultural uses but suggests that the NEC consider using the Growth Plan and Greenbelt Plan policy language.
  + The Region notes that updates to other areas of the plan may be required to be consistent with proposed changes (e.g., 2.7.8a).

Township of Clearview

* + Municipal staff have no concern with the proposal to allow ARU and OFDU in Escarpment Protection Area outside of prime agricultural areas, however, they suggest that it may be beneficial to provide additional policies related to the implementation of certain ARU and OFDU through the use of site-specific legal agreements between the NEC and individual property owners.
  + Municipal staff indicate that the proposed 2.7.2f) is generally consistent with Natural Heritage policies outlined within Provincial planning documents (e.g., PPS, Growth Plan) but suggest that additional verbiage be included which indicates that impacts related to the expansion or alteration on the feature and its function should be minimized and mitigated to the maximum extent possible. This would help align more closely with the Growth Plan.
  + With respect to agricultural uses within ES ANSI’s, staff recommend that the reference to “planning, design and construction practices” should be defined and/or elaborated on within the amendment and/or overall NEP.

Toronto and Region Conservation Authority

* + TRCA suggests that the proposed amendments may benefit from being specific to sections 2.2.2 and 2.7.5 to ensure that development will be directed away from natural hazards in accordance with provincial and TRCA policies.

Ontario Federation of Agriculture

* + The OFA thanks the NEC for the proposed amendment. OFA fully supports this amendment.
  + OFA and its local federations previously requested that the NEC give consideration to amending the policies in section 1.4 in order to permits OFDU and ARU’s within the Escarpment Protection Area “rural areas” [non-prime agricultural areas] so that these types of uses are not unduly restricted to prime agricultural areas.
  + The OFA noted the portion of the staff report indicating that these proposals do not address the full extent of the agricultural policy amendments that the key agricultural stakeholders are seeking and that “Staff provides that these additional topic areas will continue to be discussed and given appropriate consideration, including with ministry partners and a broader range of agricultural stakeholders. Staff considers the current amendment proposals as phase 1 and advancing the current amendment proposal would not preclude subsequent amendments from being considered”. The OFA agrees with this approach and looks forward to continuing discussions to ensure a viable Agricultural System in the NEP Area.

Hamilton-Wentworth Federation of Agriculture (HWFA)

* + The HWFA is pleased to support amendments to the policies in section 1.4 Escarpment Protection Area of the NEP. Consideration to amending these policies will permit OFDU and ARU sues within the Escarpment Protection Area and Rural Areas [non-prime agricultural areas] so that these types of uses are not unduly restricted to prime agricultural areas.
  + HWFA appreciates the opportunity to provide this input on the NEPA policies in support of our membership.

Ontario Craft Wineries

* + The OCW indicated that it is “uniformly disappointed in the very narrow and limited focus currently being recommended for possible NEP amendment despite what we understood from past Commission deliberations and related directions to staff, to be an expectation of more robust and multifaceted policy considerations for review and a potential NEP amendment”.
  + The OCW encourages the Commission to direct staff to return to the past list of policy topics for potential inclusion in a NEP amendment process.
  + The OCW provided a list of items it would like addressed including: transfer of oversight of temporary event approvals to municipalities, to revisit the issue of on-farm vacation accommodations, and to recognise “normal” or “good” farming practices as in the current case for “good forestry practices” and a cross-reference in the NEP to the provision of the Farming and Food Production Protection Act.
  + The OCW also attached a list of policy considerations previously sent to the NEC.

Golden Horseshoe Food and Farming Alliance

* + The Alliance supports the move to allow farmers in the NEP to have equal access to OFDU on both prime and non-prime agricultural lands.
  + There are times where placing an OFDU on prime lands, actually takes prime lands out of production. Given a choice, many farmers seeking an OFDU would prefer to keep their prime lands protected and intact for farming and locate the OFDU elsewhere on the farm.
  + WRT Part 2.7, the Alliance strongly supports the intent and spirt of the amendment and their preference would be that the NEP policy would be harmonized with Greenbelt Plan policy.
  + The Alliance believes that the Agricultural System mapping, encouraged by Provincial policy should be added to the NEP plan to align with municipalities and prevent confusion during the implementation of the Official Plans.

Coalition on the Niagara Escarpment (CONE)

* + It is hoped that one has to be a bonafide farmer in order for any of these changes to be applicable. It is agreed that on farm diversified uses are needed and we need to allow for this so that small family farms can be profitable and transferable to the next generation of farmers.
  + I worry about these changes being the gateway for developers to develop farmlands. No development should be allowed on ANSIs nor within the habitat of endangered species no matter if they fall within the either of natural or protected designations of the NEP.
  + Any development should require a professional environmental assessment of the development proposal to ensure no harm period. Mitigation is an admission of harm. We should not accept even minor damage to what is left of our natural habitats and wetlands. We need to strengthen rehabilitation and restoration of Natural features and not allow any further deterioration.

Preserve the Escarpment (PTE)

* + In general, PTE supports nearly the all of the amendment, however we strongly oppose a change that would effectively expand OFDU to any land because it would open developments that prioritize secondary use instead of agriculture first, such as attractions and events.
  + Our position aligns with the OFA who stated in the NEC staff report “The OFA and its member groups have made submissions in support of a proposed amendment to the NEP Escarpment Protection Area Part 1.4.3.2 respecting OFDUs and ARUs being permitted in prime agricultural areas only.” [N.B. this is not an accurate interpretation of the OFA position]
  + PTE is an over 300-member resident group that formed out of concern for the development of a new lavender attraction, called Fennario which puts forward a business model predicated on selling tickets and attracting tourists, which will not be controllable. This is a prime example of secondary use being prioritized rather than primary farming or agriculture.
  + While expanding on-farm diversified use to any land may sound like a positive development, there are several potential negative impacts that should be considered including Loss of Farmland, Environmental Impacts, Traffic and Congestion, Economic Impacts and Counteract Regulatory Purpose.
* 31 comments from individuals; 23 opposed 8 in support

Examples of comments in favour

* + Why would the quality of the land make any difference if we know that the farmer is capable of making it a going concern?
  + Small farms are critical to the economy and livelihoods of Canadians in our rural communities and agritourism is an honest and integral component to small farm business strategies in Ontario.
  + On behalf of our client, we wish to voice our full support on the proposal to amend the land use policies of the Escarpment Protection Area (Part 1.4.3) to allow for agriculture-related uses and on-farm diversified uses to be permitted on lands outside prime agricultural areas.
  + Owning a farm in Halton I welcome such a bill. With climate change and other factors OFDUs help a farm to bring in other streams of income. It's one thing to preserve farm land but it means absolutely nothing if a farm does not have economic viability.
  + First let me congratulate OFA on the successful work on getting On Farm Diversified Uses (OFDUs) extended to the rural area from the previous NEC interpretation of just Prime Agricultural Areas. (assuming it passes)

Examples of comments in opposition

* + I wish to present my opposition to this amendment as well as the sleight of hand gutting of the Greenbelt to accommodate the wants of numerous land developers to build homes on our protected lands. If these policy amendments are approved, the NEC is introducing grave risk to our Escarpment Biosphere by allowing OFDU’s to be established, for the first time, in “Escarpment Protection Areas”
  + Allowing greater development, traffic etc. in these “sensitive, natural and scenic” areas that you strive to protect seems to be at odds with your mandate.
  + Given the attributes of these lands (non-prime agricultural and areas of more scenic beauty) this amendment will attract non farmers seeking to game the system by offering attendance-based tourist attractions under the very loose definition of OFDU’s.
  + In this regard we request a public “in person" hearing on the proposed “ Amendment PC 225 22 - Agricultural Policies Amendment PC 225- 22 .
  + This policy is open for abuse from agritourism type attractions whose goal would be to maximize attendance and ticket sales. This would not be compatible for such an environmentally vulnerable area as the Niagara Escarpment.
  + We bought 100 acres and just finished building the house of our dreams, just to find out that one of the largest lavender attractions is planning to open on the farm field beside us. As you can imagine, this is a huge invasion of our much desired privacy.
  + I also find it relevant that the NEC wants to apply extensive control whenever I try to make even small upgrades to my property, and yet is prepared to “ hand they keys “ to any developer or project with no strings attached.
  + I am concerned that this “ribbon of wilderness” (to quote the Bruce Trail organization) will be forever lost if more tourism and related development is allowed.
  + I am writing this email in opposition of the proposed Lavender Attraction on Concession 8 in Glen Huron.