



## **A2 Staff Initial Report Proposed Niagara Escarpment Plan Amendment Grey County Regional Agricultural Learning and Demonstration Facility**

Date: February 20, 2025

File: NEPA PG 228 24

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# Proposed Niagara Escarpment Plan Amendment:

Niagara Escarpment Plan Amendment (NEPA) PG 228 24

Property Legal Address:

South Part Lot 10, Concession 2 West (formerly Township of Derby),  
Township of Georgian Bluffs, County of Grey

## 1.0 Proposal

To amend the Niagara Escarpment Plan (NEP) to permit a site-specific exception for establishing a Regional Agricultural Learning and Demonstration facility that includes an agricultural skills training program for high school students and a regional fairground that is intended to offer agriculture focused events, exhibits and activities throughout the year. Several buildings are proposed with a maximum gross floor area of 3,000 square metres consisting of a building with an office and classroom, two barns, and existing greenhouse, shed, and sugar shack. Facilities accessory to these uses are also proposed and may include both permanent and temporary amenities such as bleachers, a livestock ring, a tractor pull area, a demolition derby track, parking areas, portable washrooms, and event tents.

## 2.0 Purpose of the Report

The purpose of this report is for the Niagara Escarpment Commission (NEC) to determine whether the application should be:

1. initiated and circulated under Section 7 and Section 10 of the *Niagara Escarpment Planning and Development Act* (NEPDA); or,
2. recommend to the Minister of Natural Resources (MNR) that the application be considered frivolous, vexatious, or not in the public interest under Section 6.1(3) of the *NEPDA*.

All amendments must be considered against the Purpose and Objectives of the NEPDA as well as the objectives and provisions of the NEP and be consistent with other relevant Provincial policies.

An amendment is required to consider a site-specific permission that allows a larger gross floor area of buildings and related structures for institutional use, as well as the hosting of events, exhibition and programming activities for a public purpose that can serve the wider public area than the immediate community.

## **2.1 Staff Recommendation**

That the NEC should initiate the NEPA pursuant to Section 6.1(1) of the *NEPDA* and undertake the public and agency notice, circulation and consultation required under Sections 7 and 10 of the Act.

## **3.0 Application Details**

### **3.1 Applicant/Owner**

Applicant and Owner: Grey County

Partner Organizations: Owen Sound Agricultural Society

Chatsworth Agricultural Society

Blue Water District School Board

File Received: February 2024

Niagara Escarpment Plan Designation: Escarpment Rural Area (ERA)

### **3.2 Related Property Files**

The following NEC application is directly related to the subject lands:

**G/A/2023-2024/83** – A development permit was issued in 2023 to construct a small greenhouse, storage shed and sugar shack totalling 68.5 square metres.

## **4.0 Site Description**

The subject property is approximately 8.1 hectares in size and square-shaped with frontage on Grey County Road 18. Donated to Grey County, the lands are located adjacent to the County operated Grey Roots Museum and Archives (Grey Roots), which is an identifiable landmark and public destination in Grey County. Rockford settlement area is approximately 2.0 kilometres to the east. See Attachment - Map 1 Amendment Location Map.

The property has a rolling topography with an approximate 12.0 metre elevation change. Generally, the property slopes from north property boundary (back of property) to the south property boundary (front of property). There are several high elevation nodes with the highest elevation being 275.5 Metres Above Sea Level (masl) towards the northwest corner of the property to the lowest elevation being 263.5 masl located centrally along the east property boundary and extending towards the centre of the property offering a slight bowl-shaped landform.

NEC mapping identifies potential karst across the entire property but does not identify any significant woodlands, watercourse, wetlands, or Areas of Natural and Scientific Interest (ANSIs).

The surroundings lands are predominantly agricultural farm fields. There is a Class B licensed aggregate pit directly adjacent to the northwest corner of the property and a retail greenhouse and garden centre operation across Grey County Road 18 to the southwest. See Attachment - Map 2 Orthophoto of Surrounding Area. An urban area for the Township of Georgian Bluffs is one concession to the north.

## **5.0 Background**

Grey County has partnered with Owen Sound Agricultural Society, Chatsworth Agricultural Society, and Bluewater District School Board (partner organizations) to propose a Regional Agricultural Learning and Demonstration (RALD) facility, which will be situated on County-owned lands. See Attachment - Map 3 Concept Plan.

The partner organizations intend to use the proposed site as a public facility to offer education, training, exhibits, and events for residents and visitors to foster the importance of the agriculture industry to Grey County's economy. RALD plans to provide an educational program for students in the Bluewater District School Board's Specialist High Skills Major program (SHSM), where students in grades 11 and 12 develop their knowledge and skills in agriculture. The program equips students with relevant knowledge and skills in key agricultural practice areas, such as livestock production and crop science, to pursue careers in the agriculture sector and offer understanding in the role agriculture has in the food system.

The Owen Sound Agricultural Society and Chatsworth Agricultural Society, having experienced operational constraints with their current properties, plan to merge and form a new Agricultural Society that offers programs and services. The proposed RALD facility will support a variety of community programs and events including a multi-day regional fall fair, charitable events, a Harvest for Hunger event in support of the Canadian Foodgrains Bank, the 4-H Club and several other fundraising activities, educational events, tradeshow, and exhibitions. Some activities and events will be held in conjunction with Grey Roots events and will attract visitors from outside the Region.

With the establishment of a Regional Fairground on the lands, it is anticipated to include cattle displays and competitions; sales of household arts and crafts; horse and tractor pull; demolition derbies; livestock shows; petting zoo; educational displays; and a midway with food and games.

There is potential for the Sydenham Fall Fair to also be held on the RALD lands. The fair has taken place for over 160 years and is the only remaining school-run agricultural fair in Canada. The combined use of the RALD and Grey Roots lands would provide the land and facilities needed to operate the fair.

In addition to the agricultural education and event focused programming, the vision for the property also includes the creation of agricultural demonstration plots including an orchard and an interpretive treed pathway that highlights the importance of trees and forestry management best practices. Additionally, the RALD will be a facility for sharing First Nations and Metis history and agricultural practices, including medicinal plants and native tree species.

The subject land was purposefully selected for the RALD facility to provide the Agricultural Society and the SHMS users with historical and educational programming support from Grey Roots as a joint alignment in sharing knowledge about the County's agriculture sector. It is anticipated that the subject land and Grey Roots will share infrastructure such as parking and site access, which are intended to remain primarily on the Grey Roots land to minimize impacts to the agricultural programming activities on the RALD land. There is already a sharing of programming activities occurring between the RALD lands and Grey Roots as the SHMS program is currently utilizing a barn on the Grey Roots land in the Moreston Heritage Village to facilitate livestock husbandry while using a greenhouse, shed and sugar shack on the RALD land to other components of the school program.

## **6.0 Planning Documents**

### **6.1 Niagara Escarpment Planning and Development Act (NEPDA)**

**Sections 6.1(2.1) and 10(6)** of the NEPDA require that amendments to the NEP be justified. Part 1.2.1 of the NEP identifies that the justification for a proposed amendment to the NEP *“means the rationale for the amendment, as well as reasons, arguments or evidence in support of the change to the Plan proposed through the amendment.”*

The applicant has submitted a planning justification as required under NEP 1.2.2, and Section 6.1(2.1) of the NEPDA. All the submitted materials would be reviewed through the initiation of an NEPA process and additional information would be requested where required.

#### **6.1.1 Urban Uses Assessment**

Section 6.1(2.2) and (2.3) of the NEPDA identifies that: *no person or public body shall make an application or request to amend the Niagara Escarpment Plan if the application or request relates to land that is within the land use designation of Escarpment Natural Area, Escarpment Protection Area, Mineral Resource Extraction Area or Escarpment Rural Area of the Niagara Escarpment Plan and the application or request seeks to:*

*a) re-designate the land to the land use designation of Minor Urban Centre, Urban Area, or Escarpment Recreation Area of the Niagara Escarpment Plan; or*

*b) make any other amendment to permit urban uses unless it is during the time of a Plan Review.*

Further to above, the NEPDA sets out that applications and consideration for an Urban Use amendment can only be made at the time of a NEP 10-year review (10-year review).

The lands are designated as ERA. The application is not proposing to redesignate the existing land use designations, therefore meets with the provisions of 6.1 (2.2) a).

An Urban Use Policy was approved by the NEC in 2005 and identifies a list of uses that would be considered an 'urban use' and requiring consideration of such activities to be done during a 10-year review. The policy states that the "urban uses" identified in the policy are intended to address those activities that are not included as a permitted use within the respective NEP designation. Institutional use is identified as an urban use; however, because the use is currently permitted within the ERA designation an amendment is not required to permit the use and results in the Urban Use Policy having no effect on this NEPA. Based on this assessment NEC staff confirm that the proposal meets with the provisions of 6.1 (2.2) b).

The proposed amendment does not conflict with Section 6.1(2.2).

## **6.2 Niagara Escarpment Plan, 2017 (NEP)**

### Part 1.2.1 Plan Amendments

The NEP Part 1.2.1 identifies four provisions that are applied to applications to amend the Niagara Escarpment Plan:

1. Planning policies and land use designations may be changed as long as the Purpose and Objectives of the NEPDA and the NEP are met;
2. The NEPDA requires that amendments to the NEP be justified with a rationale for the amendment, and reasons, arguments, or evidence in support of the change to the NEP proposed through the amendment;
3. The applicant must demonstrate that the proposed amendment and the expected impacts of the proposed amendment do not adversely affect the Purpose and Objectives of the NEPDA. The proposed amendment must be consistent with the Purpose and Objectives of the NEPDA and the NEP and shall be consistent with other relevant provincial policies; and,
4. Development Criteria set out in Part 2 of the NEP will be considered in the assessment of any amendment to the NEP.

The entirety of the subject lands is within the Niagara Escarpment Development Control Area. Should the amendment be initiated, as detailed in Part 1.2.1 of the NEP, the

application and rationale to amend the NEP would be evaluated against: the overall Purpose and Objectives of the NEP and NEPDA; the NEP policies in Part 1.5 Land Use Policies for Escarpment Rural Area (sets out the applicable objectives and permissions); Part 2 Development Criteria; the Provincial Planning Statement, 2024 ; County of Grey Official Plan, Georgian Bluffs Official Plan, and, input from the public, agencies and Indigenous communities.

#### Part 1.5 Escarpment Rural Area (ERA) and Part 1.5.3 Permitted Uses

Relevant objectives of ERA designation that would be considered in reviewing an amendment include:

- To maintain the scenic resources of lands in the vicinity of the Escarpment and the open landscape character of the Escarpment;
- To conserve cultural heritage resources, including features of interest to First Nation and Métis communities;
- To provide for compatible rural land uses; and,
- To encourage agriculture and protect agricultural lands and prime agricultural areas.

The lands are currently being used as an agricultural use, with most of the site being in active agricultural crop production. A small portion of land in the northeast corner of the property is being used for the SHSM program where a greenhouse, shed and sugar shack currently exist and were permitted as an agricultural-related use under a NEC Development Permit that was issued in 2023.

The current amendment is proposing to change the land use from an agricultural use, which is generally the growing of crops and raising of livestock, to an institutional use that is defined in the NEP as:

*“the use of land building or structure for some public or social purpose that may include governmental, religious, educational, charitable, philanthropic, hospital or other similar use, including cemeteries to serve the immediate community.”*

RALD is intending to offer a wide range of services that include education, learning, exhibits, workshops, and events that have an agriculture focus and will serve not only the immediate community by also attract visitors to the area. One aspect in needing an NEPA is to address activities and events that will invite the public from a larger area then the immediate community which goes beyond the NEP definition of institutional uses. The Planning Justification Report highlights that the regional fall fair has a prominent role in supporting agri-tourism. Additionally, it is intended that RALD will complement Grey Roots which is identified as a tourism facility in the Georgian Bluffs Official Plan, in the hosting joint events and sharing event space. The RALD proposal is

not considered an agricultural-related use under the NEP because the proposed use and programming is not providing direct products and/or services to farm operations as a primary activity, for example, farm equipment repair, farm seed supplier, livestock assembly yard. There is the possibility of a farmer's market being considered on the property and if the RALD site were to be established, the farmer's market would be considered an agriculture-related use that is permitted in the ERA.

Part 1.3.5 Permitted Uses, enables an institutional use within the ERA designation where a property is located outside of a Prime Agricultural Area. NEC staff have determined that the subject lands are not within a Prime Agricultural Area based on the following:

- Grey County does map Prime Agricultural Areas with the boundaries of the NEP; and,
- The definition of a Prime Agricultural Area in the NEP includes areas of Prime Agricultural Lands associated with the Canadian Land Inventory. The Canadian Land Inventory classifies the soils on the subject property as class five, whereas Prime Agricultural Land is defined in the NEP as encompassing land classifications of one to three.

The current RALD concept is proposing three buildings:

- an office and classroom for both Agricultural Society staff and the SHSM program that would be approximately 743 square metres in size, and
- two barns with a combined total area of approximately 1,765 square metres in size and intended to be used for various livestock shows, exhibits, training, and programming space.

The combined total area of the proposed buildings is approximately 2,600 square metres. The proposed buildings combined with the existing buildings (greenhouse, storage shed, and sugar shack and total 70 square meters) would be approximately 2,700 square metres and has been rounded up to 3,000 square metres as a maximum floor area to afford flexibility as building plans are still conceptual and final sizes will not be determined until a Development Permit application is applied for at a future time. A concept of the proposed facility is shown in Attachment - Map 3 Concept Plan.

The NEP permits small scale institutional use where the gross floor area of buildings and related structures shall not exceed 500 square metres. The cumulative total size of the existing and proposed buildings is over the size generally accepted as "small-scale".

A NEPA is required to address the large scale of gross floor area proposed in buildings and related structures, as well as the hosting of events, exhibition and programming



activities for a public purpose that can serve the wider public area than the immediate community. The Similar NEPA's were done for the adjacent Grey Roots lands.

NEC staff's review of this application will include determining if the proposed use and size of gross floor area of buildings as well as related accessory structures are compatible for the site and surrounding landscape to meet the purpose and objectives of the NEP. Should a NEPA be initiated, reviewed, and subsequently approved, development of the site including the establishment of buildings would be reviewed through the NEC Development Permit application process.

### Part 2 Development Criteria

Should the Commission endorse initiation and circulation of the proposed NEPA; all applicable Development Criteria set out in Part 2 of the NEP are to be considered in the assessment of the application and will be evaluated through the review of planning rationale, comments from Indigenous communities, partner agencies, and public input.

Review of Part 2 Development Criteria policies such as the General Development Criteria, Agriculture, Cultural Heritage, Scenic Resource and Landform Conservation will ensure that the proposal meets the objectives of the NEP and NEPDA as well as the designation specific objectives for the ERA designation.

### **6.3 Provincial Planning Statement, 2024 (PPS)**

The PPS provides overall policy direction on land use planning aspects that are of provincial interest and applies province-wide, except where another provincial plan provides otherwise. The NEP is a provincial plan that builds upon the PPS policy foundation and provides additional land use planning policies in support of the Purpose and Objectives of the NEP and NEPDA. The policies of the PPS must be adhered to; however, the NEP takes precedence over policies in the PPS to the extent of any conflict.

The proposed amendment is required to be consistent with the PPS. NEC staff would consider the planning justification rationale and any other technical study that may be required to evaluate whether the proposal satisfies PPS policies for Rural Areas and Lands in Municipalities, Land Use Compatibility, Public Spaces, Agriculture and Cultural Heritage.

### **6.4 Greenbelt Plan, 2017**

The Greenbelt Plan Area includes the NEP Area. The policies of the NEP are the policies of the Greenbelt Plan except for Section 1.1 (Context); Section 1.2.1 (Vision); and the Open Space and Trails Policies set out in Section 3.3 of the Greenbelt Plan.

NEC staff will evaluate the applicant's submissions to determine whether the proposed amendment is in conformity with the policies of the Greenbelt Plan.

## **6.5 Grey County and Township of Georgian Bluffs Planning Context**

The property is located within Grey County and the Township of Georgian Bluffs. Should the amendment be initiated, NEC staff will work with both Grey County and Georgian Bluffs to receive input under the framework of their planning authority and regulatory policies, including their respective Official Plans.

The subject lands are within the NEC area of Development Control and as per Section 23(a) of the NEPDA, the local municipal zoning by-law is not in effect.

## **6.6 Grey Sauble Conservation Authority**

The subject property is not within a feature that is regulated by the Grey Sauble Conservation Authority (GSCA). The Sydenham River and the Inglis Falls Conservation Area (IFCA) which is a Nodal Park in the Niagara Escarpment Parks and Open Space System (NEPOSS), is approximately 1.0 kilometre to the east. The IFCA lands contain GSCA's administration centre, Escarpment brow, karst features, the Inglis Falls life science Area of Natural and Scientific Interest, various recreational features, and facilities as well as the Bruce Trail. Based on the proximity of the NEPOSS lands, GSCA would be circulated for commenting under their delegated responsibility to represent the Province on the natural hazard policies of the PPS.

## **7.0 Amendment Considerations**

Matters raised in this preliminary review of the application are noted to assist in determining if the application should be initiated under S. 6.1(2) of the *NEPDA*, and if so, to also provide the commenting agencies and the public with an initial understanding of the application.

### **7.1 Does the proposed amendment satisfy the Purpose and Objectives of the Niagara Escarpment Planning and Development Act and the Niagara Escarpment Plan?**

The **Purpose** of the Act and the Plan is: *"to provide for the maintenance of the Niagara Escarpment and land in its vicinity as a continuous natural environment, and to ensure only such development occurs as is compatible with that natural environment"*.

The **Objectives** of the NEPDA and the NEP are:

1. *To protect unique ecologic and historic areas.*
2. *To maintain and enhance the quality and character of natural streams and water supplies.*

3. *To provide adequate opportunities for outdoor recreation.*
4. *To maintain and enhance the open landscape character of the Niagara Escarpment, in so far as possible, by such means as compatible farming or forestry and by preserving the natural scenery.*
5. *To ensure that all new development is compatible with the purpose of the Plan.*
6. *To provide for adequate public access to the Niagara Escarpment; and,*
7. *To support municipalities within the Niagara Escarpment Plan Area in their exercise of the planning functions conferred upon them by the Planning Act.*

**NEC Staff Comment:** The proposed NEPA must be evaluated with respect to all relevant Objectives. The acceptance or rejection of this application should be dependent on whether the proposal can, maintain the purpose and objectives of the NEPDA, and can be permitted on the basis that the proposal is justified, and will not set a precedent that would open the entire NEP area to multiple and successive applications that would weaken the NEP policies on intensity of use. Evaluation should consider if the proposal is unique and therefore unlikely to occur in numerous other areas within the NEP.

The Planning Justification Report submitted with the Amendment application suggests that the Purpose and Objectives of the NEPDA and the NEP are supported. Additionally, it rationalizes that the subject lands were chosen for the proximity to similar public facilities and the potential inter-relationship of them such as Grey Roots and the Heritage Centre, Inglis Falls and the Bruce Trail.

Should the NEPA be approved for initiation, NEC staff will assess the planning rationale to determine if the Purpose and Objectives have been met.

## **7.2 Does the proposed amendment satisfy the Niagara Escarpment Planning and Development Act Requirements for an Amendment?**

Sections 6.1(2.1) and 10(6) of the NEPDA require that amendments to the NEP be justified and include research material, reports, and plans that were used in preparation of the amendment. As identified in Part 1.2.1 of the NEP, the justification for a proposed amendment to the NEP means that there is a sound and defensible rationale for the amendment, as well as reasons, arguments, or evidence in support of the change to the Plan proposed through the amendment.

**NEC Staff Comment:** Satisfactory justification of a proposed amendment must be balanced against the potential impacts on the Escarpment environment and meeting the objectives and policies of the NEP and the PPS. The acceptability of the application can only be decided once the circulation and comments on the application have been made and considered and the full review of the technical submissions has been undertaken. The Applicant provided a planning justification report which states that the proposed amendment is justified on the following basis:

- The application satisfies the Plan amendment criteria of the Niagara Escarpment Planning and Development Act.
- The application is not seeking to change the land use designation of the subject lands from Escarpment Rural Area to Minor Urban Centre, Urban Area, or Escarpment Recreation Area, given that urban areas are not suitable to carry out the proposed agricultural themed focus outlined in the application.
- The application is not proposing urban uses on the subject lands, which are incompatible with the subject lands' current Escarpment Rural Area designation.
- The proposal represents good land use planning as it endeavors to acknowledge and fulfill key economic interests and public needs of the lower-tier municipality while conforming to the purpose and objectives of the Niagara Escarpment Plan.
- The proposal conforms to the objectives of the Escarpment Rural Area designation in Part 1.5.1 of the Niagara Escarpment Plan, with the permitted uses in Part 1.5.3 being subject to a Plan amendment.
- The proposal conforms to the Development Criteria in Part 2 of the Niagara Escarpment Plan, with Part 2.2.9 of the Plan being subject to a Plan amendment.
- The proposal is in conformity with the applicable policies of the Provincial Planning Statement.
- The applicant will undertake mitigation measures to manage any potential environmental and visual impacts to the subject lands as a result of the proposal.
- The proposal conforms to the County of Grey Official Plan and the Township of Georgian Bluffs Official Plan.

The following reports were provided with the amendment application:

- NEC Plan Amendment Application, February 2024
- Planning Justification Report for the Regional Agricultural Learning and Demonstration Site, February 2024

### Other Considerations

NEC Staff have completed a review of the Urban Use policies and have determined that the policies are not in effect for the proposed amendment based on assessment provided in this report under, 6.0 Planning Documents.

The *NEPDA* provides for the opportunity to apply for amendments to the NEP provided that the application is not deemed to be frivolous or vexatious, without merit, or not in the public interest.

Section 6.1(3) of the *NEPDA* provides that: “Where, in the opinion of the Commission, an application for an amendment does not disclose a planning justification for the amendment, is not in the **public interest, is without merit, is frivolous or vexatious**

*or is made only for the **purposes of delay**, the Commission shall inform the Minister of its opinion and, where the Minister concurs in that opinion, the Minister shall inform the applicant in writing of his or her opinion and notify the applicant that unless the applicant makes written representations thereon to the Ministry within such time as the Minister specifies in the notice, not being less than 15 days from the time the notice is given, the provisions of this Act in respect of the considerations of the amendment shall not apply, and approval of the amendment shall be deemed to be refused.”*

**Public interest** is not defined in the NEP but is commonly understood to mean the welfare or well-being of society as a whole. An application could be considered not in the public interest if there was major inherent conflict with the underlying Purpose and Objectives of the NEPDA and NEP. An additional consideration in assessing public interest is with respect to public confidence in the planning process. If the facts of a proposed amendment are such that to recommend initiation or identify support for the proposal (in advance of the proper process) would undermine confidence in the planning approvals process, it could be said that the proposal is not in the public interest.

**NEC Staff Comment:** The proposed NEPA is within the ERA where institutional use is permitted outside of prime agricultural lands. The NEC has previously considered site-specific amendment applications for this use. Circulation of the amendment proposal facilitates a wider consideration of public interest by seeking partner agency and public engagement, as well assists in assessing if the purpose and objectives of the NEPDA can be satisfied.

**“Without merit”** means that the application constitutes a major conflict with the intent of the Act as expressed through the Purpose (Section 2) or the Objectives (Section 8). Consideration of a **frivolous** application include whether there is merit to the application, and whether it has any reasonable prospect of success. **Vexatious** may be interpreted to mean that the application is being made for the **purposes of delay** or to harass, annoy or cause undue hardship.

**NEC Staff Comment:** There is no indication that the application, as filed, is without merit, is frivolous or vexatious, or made for the purpose of delay.

If the proposed amendment is found worthy of initiating at this stage, it does not reflect an endorsement for approval of the application, nor does it prevent the Commission from giving further consideration at the time when a staff final review report is presented with detailed analysis and recommendations.

### **7.3 Summary of Amendment Considerations**

NEC staff finds that there is adequate information and justification provided to warrant the circulation of this application and to allow further consideration of the merits of the proposed NEPA. There is no indication that the application, as filed, is without merit, is frivolous or

vexatious, or made for the purpose of delay, and the circulation can be framed in that it seeks to also determine the matter of whether it reflects the public interest. The application would be reviewed to ensure the proposal can meet the purpose and objectives of the NEPDA, NEP and relevant provincial policies, regulations , agency input and consultation with Indigenous communities.

## **8.0 Recommendation**

That the Niagara Escarpment Commission instruct staff to prepare the proposed site-specific amendment **PG 228 24, Grey County**, for circulation and notification pursuant to Sections 7 and 10 of the NEPDA.

**Prepared by:**

Original signed by

Janet Sperling  
Active Senior Strategic Advisor

Original signed by

Shazia Khan  
Acting Planner

**Approved by:**

Original signed by

Shawn Carey  
Director

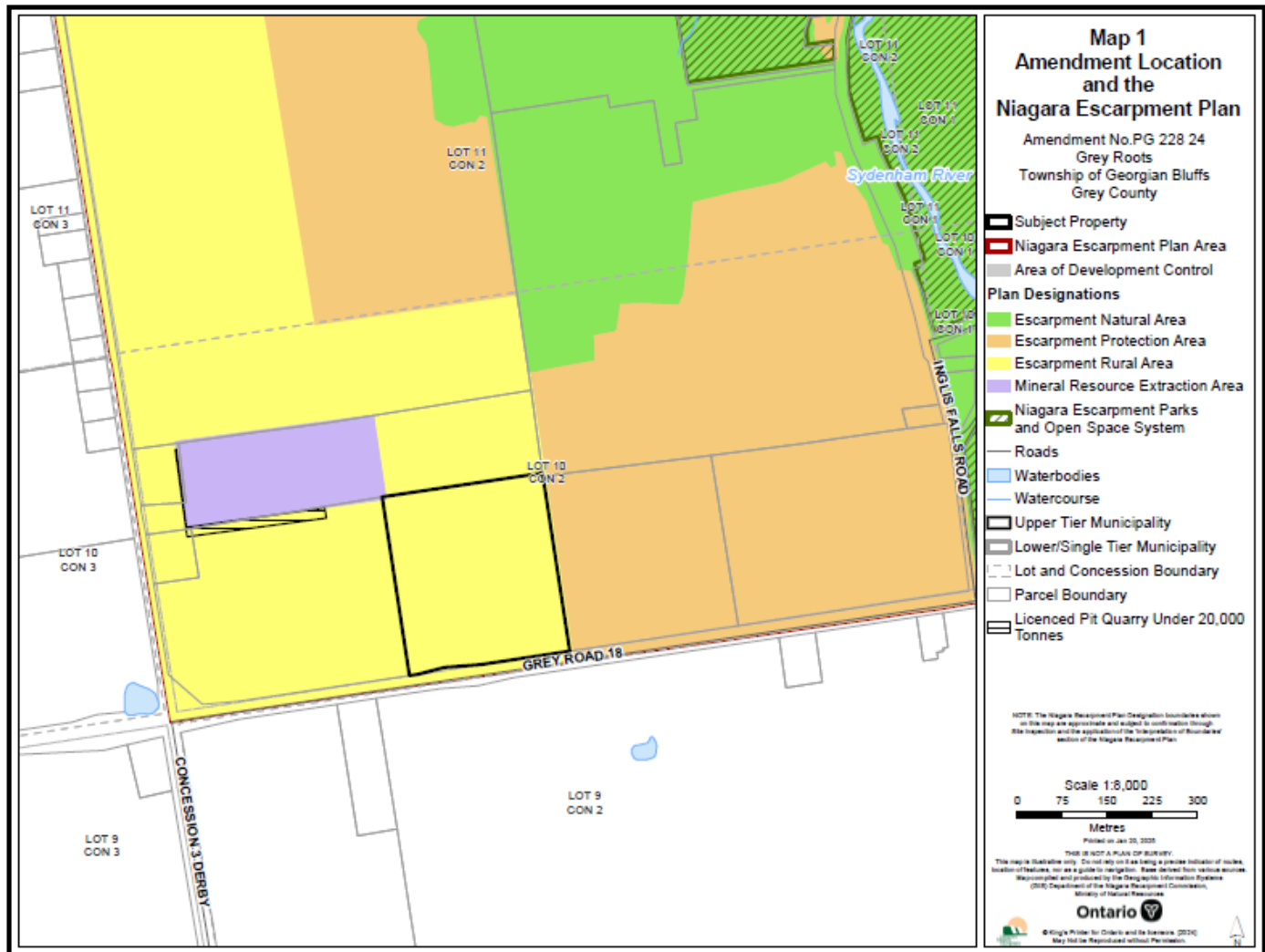
**Attachments:**

Map 1 Amendment Location

Map 2 Orthophoto of Surrounding Area

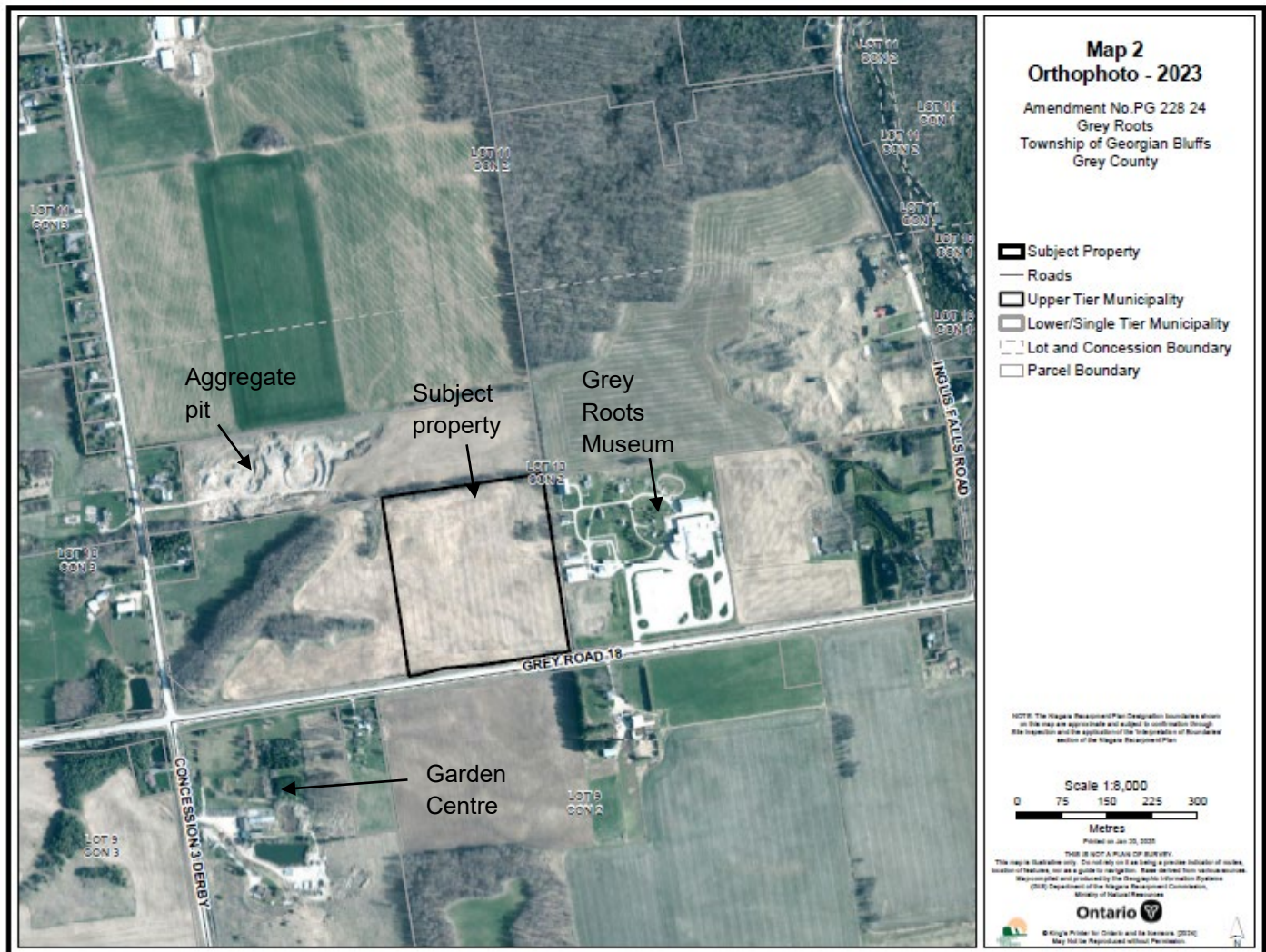
Map 3 Concept Plan

## Attachment 1 – Amendment Location Map





## Attachment – Map 2 Orthophoto of Surrounding Area



## Attachment – Map 3 Concept Plan

