



May 22, 2015

Mr. Richard Stromberg  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street  
Toronto, ON  
M5G 2E5

Dear Mr. Stromberg;

**RE: EBR Registry 012-3256 Co-ordinated Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan.**

The Golden Horseshoe Food and Farming Alliance (GHFFA) is a collaboration of the Regional Municipalities of Niagara, Peel, Halton, York and Durham and the Cities of Hamilton and Toronto, farmers, post secondary institutions and research, the Toronto Region Conservation Authority and the Friends of the Greenbelt Foundation. The collaboration works for an integrated and coordinated approach to food and farming viability in the area to ensure that the Golden Horseshoe retains, enhances and expands its role as a leading food and farming cluster. Our membership lives, works and farms within the area of the 4 Plans and have experienced a direct impact of the various plans.

**Introduction**

As residents of the Golden Horseshoe, one of the fastest growing areas in Canada, we are blessed with some of Canada's best climate, soils and water resources. Agricultural production and food processing are estimated to generate \$12.3 billion in output annually. This direct output, in turn, stimulates \$35 billion of total estimated annual economic activity across

Canada's economy. As one of the largest food and farming clusters in North America, the Golden Horseshoe area must remain a place for food to grow and that food to be processed for consumption in and outside of Canada. Our proximity to the American market gives the Golden Horseshoe opportunities not found in other areas of the province. We have access to domestic and international markets, a skilled labour force, transportation infrastructure and a wide variety of research and post-secondary institutions.

To keep the Golden Horseshoe farmers and the food processing industry the economic driver that it is within the Golden Horseshoe (and mostly Greenbelted area) there must be a pervasive sense of enabling the cluster and not shackling it with countless layers of regulation, transportation systems that are gridlocked and crumbling infrastructure. We can do better and we must.

**Forty-three percent of the Greenbelt lands are farmed and privately owned.** Farm families operating 5,500 farms not only conduct their business producing food but are stewards of large areas of natural heritage features, water, woodlands and wildlife. Local food for the growing population in the Golden Horseshoe is supplied from this region. Modern Ontario farms produce more than food, with over 200 products from food to fiber, energy and nutraceuticals, all contributing to the health and viability of Ontario communities and economy.

During the last 50 years, we have lost 2.6 million acres of farmland in the Golden Horseshoe to development. Prime farmland is a finite resource and once houses, industry or major roads have been placed on the land, it is lost to food production forever. Placement of the Greenbelt on these lands has slowed the unchecked sprawl but has also brought to light many of the unintended shortcomings of the plans.

The Golden Horseshoe Food and Farming Alliance strongly supports the following principles:

- 1) Primacy of agricultural lands and agricultural activity needs stronger protection** – The original intention of the Greenbelt Plan was to reduce the disappearance of Canada's best agricultural lands and protection of watershed areas from residential, commercial, industrial, or infrastructure development. While the plan has achieved significant successes in the protection of environmental features, the pre eminence of agricultural lands and activity within the Greenbelt must be supported as equally as natural heritage features and systems.  
As a society, we must value agricultural land for the contribution that it gives not only to our economy but to our food security and contribution of ecological goods and services. Society must stop the temptation to use scarce agricultural land as an unlimited resource for housing lands, dumps, gravel pits commercial development, and infrastructure such as highways, utilities and renewable energy. The highest and best use for agricultural lands is agriculture.
- 2) Definitions and policies in the plans should align with the PPS 2014** - We have created a fortress of regulations that are strangling economic growth and innovation in the Golden Horseshoe. The four plans were written at different times and for different purposes. The plans are not harmonized with respect to their policies,

designations, and definitions. Harmonization would be useful across the policies in the four plans relating to agriculture, natural heritage and water resources, and should also consider rural uses, settlement policies and servicing. Contradictions and confusion arise especially when the plans overlap. The Provincial Policy Statement establishes more permissive language relating to permitted uses on agricultural land which helps keep agriculture viable. The language and definitions of the plans should be updated and consistent with the PPS 2014.

- 3) **Connectivity of agricultural systems must be maintained** – The plans currently protect the connectivity of natural heritage systems. In many cases, the connected natural heritage systems are disconnecting agricultural lands and fragmenting farms. Agricultural lands are not as well protected from fragmentation. Fragmentation of agricultural lands will lead to the demise of farm operations. Farmers cannot survive if they are surrounded by urban boundaries and disconnected by large swaths of natural heritage designations. Agricultural systems must be defined and connectivity between agricultural areas ensured. Agricultural systems are mentioned in the Greenbelt Plan but not sufficiently defined for sound decision making at the municipal level.
- 4) **Appropriate infrastructure must be part of modern agriculture business and rural life in the Greenbelt** - Infrastructure in near-urban areas means more than transit and highways. Access to natural gas, water, three-phase power and high-speed internet are essential to the operation of modern agricultural businesses. Families living within the Greenbelt need high speed internet for the operation of business in the global market place. Without access to these modern supports, agriculture in the Greenbelt is relegated to low-tech status and the young people entering agriculture will move out of the Greenbelt to areas more welcoming to modern progressive farms.
- 5) **Investment required in Environmental Farm Plan and Source Water Protection initiatives targeted at Greenbelt area** – to further protect watershed areas in Oak Ridges Moraine and other sensitive areas, a reinvestment in the Environmental Farm Plan should target Source Water, Watershed health and Climate Change mitigation. Farmers are good stewards of their land but cannot bear all of societal costs to do so.
- 6) **Intensification of urban areas require buffer zones between people and agriculture** – Many of the farms in the Greenbelt are family farms established for several generations. As development comes closer to the farmed area, appropriate buffer zones should be required from the developer and not from the existing farm

business. MDS exists for livestock operations and siting of development. Reverse MDS should be considered for farms and development and applied within urban boundaries. Tools such as buffer zones have been used successfully in British Columbia for many years.

- 7) Niagara Escarpment Commission is redundant when dealing with land use issues.** The addition of another layer of oversight ends up adding costs, time delays and frustration when a farmer wants to add a building or build a value-added on-farm enterprise. Many times we have seen this happen especially in the regions of Niagara, and Peel.
- 8) Bring Plans together under one Ministry.** Currently the four plans are administered under different Ministries within the Ontario government. To bring the four plans together for consistency, we would recommend that they all be housed under the Ministry of Municipal Affairs and Housing. As many of the staff within these Ministries have scant knowledge or appreciation for agricultural issues, we would also recommend that the Ontario Ministry of Agriculture and Food take a more assertive role.

### **Specific Responses to Provincial 4 Plan Review Questions Provided**

#### **4.1 Protecting Agricultural Land, Water and Natural Areas**

*1a. How can the plans better support the long-term protection of agricultural lands, water and natural areas?*

Expansion of Greenbelt:

- Within the current Greenbelt boundary, we encourage the expansion of the Greenbelt to the urban river valleys
- The Alliance does not support the expansion of the Greenbelt beyond the current boundaries but if the Greenbelt must be expanded, the Alliance recommends expansion of the Greenbelt beyond the Greater Toronto Area to include the entire province to provide an economically level playing field, remove existing inequities and ensure the long-term protection of agricultural and natural heritage systems throughout Ontario

New approaches and tools to protect agricultural land, water and natural areas:

- Adopt the permitted uses policy language from the PPS in the Greenbelt plan. Without alignment of the Greenbelt and PPS policies; different permitted uses in

rural areas could lead to confusion, and interpretation and implementation challenges;

- Support each municipality to develop a “one- stop shop” for permits for agricultural expansion or on-farm value added or value retention enterprises
- Encourage an appreciation for agriculture among decision makers as an industry with significant economic impacts (e.g. investment, jobs and food production);
- Consider new, more effective separation distance policies to provide an appropriate buffer between new residential development and viable farmland to protect farm viability and avoid land use conflicts; and
- Consider a method of compensation for communities curtailed by provincial policy for their role in maintaining the Greenbelt’s valuable ecological and hydrologic functions.
- Lastly, the Greenbelt Plan’s Natural Heritage Policies are hindering agricultural use and development, by applying 30-meter buffers around watercourses, man-made ditches and agricultural drains. This is especially problematic in the Niagara area where farm sizes are small and the buffers create unrealistic land use on small acreage. A 30-meter separation from natural heritage features, such as woodlots, pushes new barns and other farm buildings out into productive croplands rather than close to the edge of the feature, thus maximizing use of croplands.

Reasonable set backs from significant wetlands and lakes are encouraged.

Removal of setbacks from manmade watercourses for the purposes of irrigation should happen.

Grow and strengthen the network of open spaces and recreational opportunities:

- Allow municipalities greater flexibility to permit new or expanded cultural, recreational, and tourism uses, including country inns, restaurants, ski areas, golf courses and other similar uses within the NEC and Greenbelt Plans. Increased permissibility would need to consider the appropriate scale and location of these uses, and ensure that they clearly advance plan objectives and continue to comply with natural heritage and agricultural protection policies; and
- Pilot a range of tools that can further advance plan objectives related to enhancing natural heritage features/systems and trail creation, including tax credits or other forms of compensation for trail easements and the use of ecological best practices.

Enhance the impact of agriculture on Ontario’s economy:

- Increase flexibility to allow municipalities to permit appropriately scaled and standalone agriculturally-related and/or on-farm diversified uses in prime agricultural areas where these uses:

- can demonstrate strong demand and clear economic benefits, are located on lower quality or less viable agricultural land,
  - are compatible with and do not hinder surrounding agricultural operations, and
  - continue to comply with natural heritage policies
- This would effectively align the plans with the new PPS direction, detailed in the draft PPS guidelines released by OMAFRA on Permitted Uses in Ontario's Prime Agricultural Areas.
- Greater oversight and control of fill disposal is also required, dumping of fill (which could be contaminated) in rural areas puts groundwater and agricultural land at risk of contamination. More rural communities are recognizing this potential threat and would benefit from stronger provincial guidance and oversight
- Development applications that pre-date the plans i.e., transitional applications, can currently proceed regardless of their incompatibility with current planning standards and their potential degradation and destruction of ecological and hydrological features and functions. This diminishes the public confidence in the stability of the boundaries and the longevity of the Greenbelt Plan.

*1b. How can the plans better direct urban development to areas already developed?*

- Establishing firm urban boundaries on a 20, 30 and 35 year basis based on the existing Urban Area boundary in Regional Official Plans;
- The Province should remove the right to appeal the establishment of firm urban boundaries within OPA's
- Municipalities should be required to meet intensification targets. Ontario Municipal Board should not overturn intensification targets. Province should consider strengthening intensification targets to direct development away from Agricultural lands

*1c. What new approaches or tools could be used to protect agricultural lands?*

- Developing and encouraging a focus for municipal decision makers and awareness for agriculture as an industry with significant economic impacts (e.g. investment, jobs and food production).
- Establish a plan to deal with the negative impacts of urban growth near agricultural areas in the Region with effective buffer planning to provide certainty for family farm succession planning;
- Define and clarify "agricultural system" currently named in the Plan but not well defined
- Provide training for urban planners in municipalities to better deal with agricultural land use. Urban planning principles are problematic when applied to agricultural lands.

*1e. How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario's economy?*

- The plans (ORMCP, in particular) by virtue of some restrictive provisions do not readily support a working agricultural/rural landscape, with clear and supportive policy that can facilitate agriculture-related, value added and on-farm diversified uses
- Clarify that "major development" in the ORMCP does not include agricultural buildings and allow municipalities the flexibility to exempt or reduce the studies required for agricultural expansion
- Directed development needs to be focused away from prime agricultural lands
- Introduce additional tools such as guidelines to protect viable agricultural operations from encroachment
- Establish enhanced financial support programs for environmental stewardship initiatives on agricultural lands

#### **4.2 Moving People and Goods and Building Cost-Effective Infrastructure**

*2. How can the plans be strengthened to ensure our communities make the best use of key infrastructure such as transit, roads, sewers and water?*

- Better promote livable, walkable communities that use new and existing infrastructure in the most cost-effective way:
- Enable the movement of large farm equipment on roads, bridges, traffic circles, etc. in active agricultural areas. Road, bridges and traffic circles that are not designed to safely accommodate modern farm equipment, e.g. hard, vertical curbs, traffic circles too narrow and/or too tight to allow wide and long farm vehicles to pass through, hinders the viability of agriculture in the area covered by the four plans. Design standards must be developed for roads, bridges and traffic circles that allow large farm equipment to freely move along, across and through these features.
- Support goods movement by all modes of transportation: road, rail and water
- Develop, through the Ministry of Transportation, long term plans for goods movement by having their own long-term phasing and implementation plan for new Infrastructure as well as infrastructure improvements similar to The Big Move for Provincial Highway
- Identify and better protect the strategic infrastructure corridors not just for movement of people (transit) but for the movement of goods and services for a vibrant economic region needed over the long term:
- Define strategic infrastructure corridors to be protected on the map schedules/plans, while also providing policy direction for municipalities to protect roads and transit within Official Plans.
- Expedite such exercises to the least amount of time possible to minimize impact on the residents and businesses impacted by the assessments, design and construction of infrastructure.

- Balance the need for critical infrastructure to support economic growth with environmental protection
- Consider how to best balance plan objectives related to infrastructure development (e.g. provincial highways and Green Energy Act projects) and protection of the agricultural land base and natural heritage systems to minimize any impacts associated with infrastructure projects.

*2c. 2f. How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?*

- Examine existing Rural Area Land Uses to recognize historic highway commercial areas and dry industrial parks that will never revert to agriculture
- Commit to completing an investigation into the long-term impact of transportation corridors activities on agriculture and related water supplies (i.e. salt migration).

#### **4.3 Fostering Healthy, Livable and Inclusive Communities**

*3. How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?*

- *Intensification targets for municipalities must be met or exceeded.*
- *Acknowledge that communities that are not walkable and providing services in a small footprint are increasing pressure and demand for development on agricultural lands.*
- Acknowledge and report on the environmental benefits that agricultural areas provide to urban areas and healthy communities(i.e. sequestering, carbon, environmental goods and services, NHS protection and preservation, etc.);

*3c. How can the plans better protect heritage buildings, cultural heritage landscapes and archaeological resources?*

- Natural heritage and water resource systems policies, designations, criteria and mapping should be harmonized with an appropriate standard of protection across all of the provincial Greenbelt plans
- The Province should review the need to prescribe criteria for certain types of key agricultural features (e.g. agricultural drains, headwater swales, etc.) which have not been viewed to be reasonable by the public or necessarily required in light of existing regulation outside of the Planning Act (e.g. Conservation Authorities regulations, Fisheries Act, Woodland Protection By-laws)
- When harmonizing natural heritage policies, care should be undertaken to ensure there is no over-regulation of small scale development or unnecessary requirements that trigger planning approvals for accessory uses, buildings and structures or for minor modifications to existing uses and non-conforming uses
- Policy harmonization for natural heritage should carefully balance and simplify implementation requirements for agriculture, since both agriculture and natural heritage can and must co-exist in a working landscape



#### **4.4 Building Communities That Attract Workers and Create Jobs**

*4. How can the plans better support the development of communities that attract workers and the businesses that employ them?*

- Define a class of 'strategic employment lands' that are essential for future employment development and that are dependent on infrastructure for goods movement, including industrial/manufacturing/logistics, by articulating criteria in the Growth Plan that would aid in identifying these strategic employment land, including such areas as 400 series highway corridors, airport lands, border crossing areas, active ports and harbours, and strategic transit corridors;
- For the plans' policies to better support and foster vibrant rural economies while taking into account the character of rural areas and communities, it is suggested that the province:
  - Allow municipalities and conservation authorities the flexibility to exempt or reduce the scope of extensive hydrological studies required by ORMCP major development policies for agricultural buildings larger than 500 sq. m., so long as these buildings comply with other natural heritage protection policies;
  - Generally clarify in the ORMCP that in the review of small scale developments, municipalities have flexibility to work with Conservation Authorities to determine if technical studies are needed as well as the scope of studies;
  - Increase flexibility within the Landform Conservation policies, e.g. the amount of net developable area of a site that can be disturbed. If features are protected and connectivity maintained, the disturbed area could be higher than the thresholds in the ORMCP; and
  - Provide increase flexibility in the ORMCP policies to allow existing major recreational and rural commercial uses in Core/Linkage areas to continue, expand or add activities, where appropriate.

*4c. How can the plans balance the need for resource based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?*

- The province should comprehensively review provincial aggregates policies beyond the current policies within provincial land use plans and strengthen provisions encouraging comprehensive rehabilitation planning
- Land use policy should not apply retroactively to existing licensed operations, nor can existing policies compel future operations to substantively contribute to the rehabilitation of other sites
- Strengthened policies within the provincial plans, as well as new Provincial regulation or incentives outside the Planning Act, such as dedicated use of increased aggregates levies, should be developed as a coordinated framework to more effectively achieve the plans' comprehensive rehabilitation objectives related to aggregates resources

- Expansion or enhancement of the Management of Abandoned Aggregate Properties Program (MAAP) should be considered as a vehicle to deliver stronger aggregates rehabilitation policies where extraction activities have been concentrated
- Recognize that stewardship of the natural environment as part of normal farm practice

*4d. How can the Plans' policies better support and foster vibrant rural economies while taking into account the character of rural areas and communities?*

- The Greenbelt Plan and ORMCP should not further restrict the full-time labour accommodation policies
- Establish and advocate for a cost structuring of municipal services and taxes that support improved farm economics in agricultural areas;
- Advocate on behalf of the agricultural community to both the Federal and Provincial levels of government for the development of financial assistance and/ or support programs to attract and retain of new farm families
- Amend the provincial plans to include policy guidance and direction on the preservation of adequate farm business economics and not just farmland preservation.

#### **4.5 Addressing Climate Change and Building Resilient Communities**

*5. How can the plans help address climate change?*

For the plans to contribute to reductions in greenhouse gas emissions, it is suggested that the province:

- Acknowledge the value that agricultural lands and woodlots play in carbon sequestration, groundwater recharge, climate change mitigation and wildlife habitat, including pollinator habitat
- Encourage various sectors (e.g. industry, agriculture, transportation, waste, forestry, etc.) to use alternative fuels and green energy sources for operations;
- Encourage the use of Environmental Farm Plans and enhanced investment in the Environmental Farm Program by Federal and Provincial governments;
- Invest in transit and active transportation facilities, and connect Urban Growth Centre's (UGC) with GO Transit rail service;
- Include policies to support home-based businesses that reduce work-related travel; and
- Review the input from the provincial consultations on the Climate Change discussion paper for common themes, goals and suggestions that should be integrated and aligned with the provincial land use plans associated with this co-ordinated review.
- In an effort to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas, it is suggested that the province:
- Consider how the reduction in permeable land could result in increased flooding risks, including new approaches to reducing impervious surfaces and excess run-off and mitigating these potential risks.
- Protect agricultural infrastructure such as irrigation canals for the use of crop irrigation and not classify as environmental features or Environmental Protected Areas

#### **4.6 Improving Implementation and Better Aligning the Plans**

##### *6. How can the implementation of the plans be improved?*

For opportunities to better align key components of the plans with each other, and with other provincial initiatives, and in an effort to reduce overlap and duplication, it is suggested that the province:

- Review, clarify and align definitions, designations, policies, technical guidelines and overarching policy objectives between the Greenbelt, ORMCP, and other related provincial policies, legislation and regulations (e.g. Source Water Protection, Clean Water Act, Nutrient Management, Certificates of Approvals, etc.);
- Create a public information package that clearly delineates the hierarchy of different plans, the roles of levels of government, and how to contact agencies that can provide assistance with navigation and interpretation, effectively resolving issues of uncertainty about which plans or legislation take precedence;
- Consider the additional layers of policy restrictions, and consider consolidating plans where possible/appropriate for those plans affecting the Region, including the Lake Simcoe Protection Plan, Source Water Protection, Central Pickering Development Plan, Great Lakes Protection Act, Minister's Zoning Order on the Pickering Agricultural Preserve, and the Pickering Airport lands etc. The review does not address/capture these additional layers or provide clarification regarding which ultimately may take precedence;
- Identify new ways to integrate the plans with related provincial and municipal policies to ensure timely remediation of aggregate operations and effective regulation of potentially impactful activities, such as water takings, commercial fill and other significant site alterations;
- Provide enhanced direction/regulation related to site alteration, in addition to the existing guidelines for fill operations, as it continues to be a challenging issue for many municipalities;
- Review and update the groundwater policies of the Plans in accordance with the final development and approval of Source Water Protection Plans;
- Coordinate and align the 10-year Provincial Plans Review to include the PPS and Metrolinx's The Big Move.

In an effort to develop additional tools or guidance materials to help support implementation, it is suggested that the province:

- Provide increased direction and support to municipalities and conservation authorities to assist with plan implementation, possibly including improved technical papers, workshops, policy interpretation statements and/or more opportunities for specific communication directly between the Province, the Region, and area municipalities.
- Prioritize the alignment of regional and area municipal plans and regulations to optimize implementation, including permitting agriculture-related, value added and secondary

uses in municipal zoning by-laws (e.g. farm gate sales, food processing, farm-related home businesses and agri-tourism uses);

- Ensure that monitoring efforts anticipated by the plans are pursued and that implementation progress is transparently shared with the public;
- Develop the financial tools to incentivize intensification in UGC's, centres and corridors;
- Develop effective monitoring in collaboration with municipalities, using the most accurate data available and consistent methodologies;
- Develop a consistent land budget methodology, developed in consultation with municipalities, to ensure success of the implementation of the Growth Plan;
- Develop a consistent approach to defining density (gross), which effectively "nets out" major infrastructure such as airports, hydro transmission corridors, hydro generation stations, Provincial 400-series highway right-of-ways, etc.; and
- Amend the combined employment and residential density target to distinguish among the types of employment, wherein only population-related jobs would be combined with the residential target.

For opportunities to better facilitate implementation, it is suggested that the province:

- Provide municipalities, and conservation authorities in consultation with municipalities, the latitude to interpret and apply natural heritage protection policies in a way that upholds the intent of the policies without unduly restricting low-impact activities or requiring overly burdensome technical studies;
- Provide municipalities, and conservation authorities in consultation with municipalities, with the authority to allow qualified staff to confirm the presence, nature and extent of natural heritage features, and identify a simple process to correct designations and mapping (within the boundaries of the Growth Plan) accordingly;
- Review the transition policies between the ORMCP and the Greenbelt Plan for consistency, and provide a specific "sunset date" for inactive transitional applications to help provide applicants with a deadline to complete the planning process; and
- Review intensification targets and Built Boundaries, in consultation with municipalities, by 2031 to continue to support future intensification/redevelopment in neighbourhoods built post-2006.
- Although the Plan recognizes the importance of cultural heritage resources, the policy framework is weak
- There is no mechanism in the Plan to allow for the adaptive reuse or severance of buildings designated under Part V of the *Ontario Heritage Act*
- There have been cases where smaller places of worship are no longer viable and there are no alternatives for this use
- These buildings do not lend themselves to many agricultural uses
- In addition, there have been cases where designated building is located on land that is either agricultural or cemetery but cannot be severed to allow for two useful parcels of land
- The province should avoid developing and applying policies homogeneously. One plan does not fit all.

*6a. Are there opportunities to better align key components of the plan with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?*

- Reduce the existing duplicative policies among the provincial plans; better synchronize the review cycle of the PPS and Provincial Plans, and resolve issues of uncertainty about which plans or legislation take precedence
- Address inconsistencies among definitions between the plans
- Implementation challenges also arise when multiple layers of policy are required to be implemented across a jurisdiction. This has been particularly relevant for the municipalities (eg. Region of Peel and Town of Caledon) where all four plans have prescribed requirements, criteria and mapping of natural heritage systems and features, and where policies are inconsistent between plans

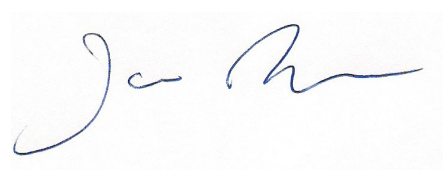
*6c. Should the province develop any additional tools or guidance materials to help support implementation?*

- The policies are very rigid and do not provide any flexibility to change the mapping or provide alternative vegetation production zones (buffers)
- Environmental Impact Statements (EIS) are scientific studies that allow for migration and protection of features and the associated buffers
- The municipality should have the discretion to alter the buffers on the basis of the EIS

Your panel has a massive task at hand that will set the stage for a vibrant economy for the future of our province. We look forward to the results of your deliberations.

Thank you for the opportunity to comment.

Respectfully submitted,



Chair

Golden Horseshoe Food and Farming Alliance