



June 30, 2021

Honourable David Piccini  
Minister of the Environment, Conservation and Parks  
5<sup>th</sup> Floor, 777 Bay St.  
Toronto, ON  
M7A 2J3

Hon. David Piccini,

**Re: Commentary on the Draft Land Use Compatibility Guideline**

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Glen Schnarr & Associates Inc. (GSAI) is pleased to have the opportunity to provide commentary on the Ministry of the Environment, Conservation and Parks (MECP) proposed Land Use Compatibility Guideline (the “Draft Guideline”). GSAI staff have thoroughly reviewed the Draft Guideline, and we are providing this correspondence as a formal response to MECP’s request for public comments on the matter.

As professional planners, we provide these comments with a desire to effect positive change to the planning process in Ontario, as they reflect our impressions of the anticipated impacts of the Draft Guideline from the perspective of our profession. We represent over 1,400 landowners, primarily in the western portion of the GTA, and we are submitting our comments and concerns both on our own behalf as professional planners and on behalf of our clients, as the Draft Guideline would have major impacts on the planning process for both major facilities and sensitive land uses across all built-up areas and urban greenfields in Ontario.

**About Glen Schnarr & Associates Inc.**

GSAI is an urban and regional land development consulting firm providing professional planning services to developers and landowners in southern Ontario since 1986.

GSAI is committed to delivering technically sound and feasible land use planning solutions. We have the expertise to complete a variety of projects ranging from small residential minor variances to larger scale planning projects such as industrial developments, residential subdivisions and high-density residential projects. We are also experienced in large landowner group representation to the land development industry. In our capacity, as professional land use planners, we have been involved in a great number of Ontario Land

10 KINGSBRIDGE GARDEN CIRCLE  
SUITE 700  
MISSISSAUGA, ONTARIO  
L5R 3K6  
TEL (905) 568-8888  
FAX (905) 568-8894  
www.gsai.ca



Tribunal (formerly Local Planning Appeal Tribunal and Ontario Municipal Board) hearings on a wide range of land use planning matters.

We place high importance on our abilities to comprehensively understand and implement Provincial policy objectives and as such we welcome the opportunity to provide comments on matters relating to the Draft Land Use Compatibility Guideline.

### **GSAI Response to the Draft Guideline**

We provide the following commentary on the matters presented by MECP for discussion during the public consultation process. GSAI is a strong supporter of the essential role of the Province and MECP in providing policies and guidelines that ensure lands are developed in a manner that is compatible with existing land uses, and that impacts from noise, vibration, dust and odour are avoided or mitigated. We recognize the objective of the Draft Guideline in that it aims to protect important industrial and employment uses and to allow them to co-exist in prosperity with sensitive land uses.

The D-Series Guidelines have been in effect since 1995, and have helped guide development since their establishment. Though we understand that MECP is exploring updating these Guidelines, we have a number of concerns with the Draft Guideline as presented and the anticipated impacts it will have.

#### **1. New Industrial Classes**

The Draft Guideline proposes to increase the number of Industrial Facility Classes from three to five, and in almost all cases to increase the Minimum Separation Distances (“MSDs”) and Areas of Influence (“AOIs”). The Draft Guideline also establishes alternate AOIs and MSDs for select major facilities (“use-specific categories”).

The new Classes do not appear to capture all types of major facilities. In particular, warehouses and other types of prestige industrial development, which do not typically have the same degree of impacts as most other major facilities, are not included under any of the five categories, nor the use-specific categories. Our understanding is that any land use that requires an Environmental Compliance Approval (“ECA”) and/or Environmental Activity and Sector Registry (“EASR”) may trigger review to ensure said facility is consistent with the applicable guidelines. This may render warehouses and prestige industrial development subject to the Draft Guideline. We request clarity as to whether or not the Draft Guideline is intended to apply to these uses.

Our concern is that, should the Draft Guideline apply to warehouses and prestige industrial uses, they may fall under the Class I Industry category by default, thus requiring an MSD of 200 metres and an AOI of 500 metres. This is greater than many use-specific MSDs and AOIs (for example, ready-mix concrete facilities have an MSD of 100 metres and an AOI of 250 metres). Considering the comparatively low impact of warehouses and prestige industrial uses, consideration should be given to providing reduced MSDs and AOIs for these uses, or making them exempt from the Draft Guideline entirely.



## **2. Expanded Areas of Influence (“AOIs”) and Minimum Separation Distances (“MSDs”)**

In almost all cases, the AOI has been increased. While the D-6 Guideline contains Potential Influence Areas ranging from 70 to 1,000 metres, the Draft Guideline prescribes AOIs ranging from 500 to 2,000 metres for the five classes (though some use-specific categories are as low as 250 metres).

As with the AOIs, the Draft Guideline would increase MSDs for all classes of industrial facilities. While the D-6 Guideline prescribes MSDs ranging from 20 metres to 300 metres, the Draft Guideline increases these to a range of 200 metres to 500 metres (though some use-specific categories are as low as 100 metres).

We question the rationale behind the increased AOIs and MSDs. Very little information has been provided detailing how these were determined, and if there is any empirical evidence that MECP may have used to generate these distances.

The “*Policy and Forms Impact Analysis*”, released in conjunction with the Draft Guideline, states that the increase in AOIs and MSDs “*is based on 10 years of MECP’s documented complaint data for noise, dust and odour*”. No information is provided indicating whether this data is generated by compliant major facilities or by “bad actors”. We contend that separation distances should be determined based on actual measured impacts, rather than by complaint records which are likely reflective only of non-compliant facilities, and are therefore overly restrictive for the vast majority of major facilities.

As per Section 2.1.1 of the Draft Guideline, any proposal for a new or expanding sensitive land use within a major facility’s AOI, or for a new or expanding major facility that would capture existing sensitive land uses within its AOI, requires a compatibility study in support of the proposed use, assessing the anticipated noise, vibration, dust and odour impacts.

Conversely, the in-effect D-6 Guideline has more open-ended language pertaining to influence areas. Section 4.1 of the D-6 Guideline classifies them as “Potential” Influence Areas, which can be refined via site-specific studies. The influence areas are to be relied upon only in cases where the actual influence area has not been assessed. The D-6 Guideline does not include language prescribing compatibility studies for proposals that would capture a sensitive land use within a major facility’s AOI, though in practice these influence areas do inform whether or not compatibility studies are required, at the municipality’s discretion.

There are existing major facilities throughout the vast majority of Ontario’s built-up and urban greenfield areas. The increased AOIs, and the requirement for compatibility studies for all development proposals that would capture sensitive land uses within an AOI, means that a much larger percentage of development proposals would be subject to compatibility studies. This includes development in many municipalities’ designated growth areas and Major Transit Station Areas. As a result, implementation of the Draft Guideline will frustrate development, as it will increase costs and time required to reach approval, and will make it more challenging for municipalities to achieve growth and intensification targets.

Consideration should be given to reducing AOIs, and/or to adding language giving municipalities discretion to determine the need for compatibility studies within AOIs.



The required Demonstration of Need Study adds a significant additional requirement, and represents a barrier that will inhibit development of sensitive land uses that have otherwise been demonstrated to be compatible with nearby major facilities. We expand on this below.

Currently, planning authorities require compatibility studies as submission requirements for Official Plan Amendment and Zoning by-law Amendment applications within a major facility's influence area. These compatibility studies are prepared by technical experts on behalf of the proponent, and are peer-reviewed by technical experts on behalf of the municipality. Applications are approved only when both sides are satisfied with the conclusions of the compatibility studies, and where it has been demonstrated that there will either be no impact, or that the proposed mitigation measures will satisfactorily mitigate impacts. This has been a supportable approach in land use planning to date.

There has been no indication that approvals granted under this regime (for both major facilities and sensitive land uses) have resulted in land use conflicts. Therefore, the significant overhaul proposed by the Draft Guideline, which would result in compatibility studies being required for a much larger percentage of development proposals, places major additional burden on development in a system that appears to function well.

We request MECP provide more information as to which facilities generated the complaints that have informed the new MSDs and AOIs, as it is important to determine if the current regime truly is inadequate, or if these are the result of "bad actors".

#### **4. Demonstration of Need Studies**

The Draft Guideline defines a Demonstration of Need Study as "*an assessment that determines whether there is an identified need for the proposed use in the proposed location and evaluates alternative locations for the proposed use if avoidance is not possible. This assessment is only required for proponents of sensitive land uses*". A Demonstration of Need Study would be a requirement where (a) a sensitive land use is proposed within a major facility's AOI, and compatibility studies have concluded that mitigation methods are required, or (b) if a sensitive land use is proposed within a major facility's MSD.

The Section 2.8 of the Draft Guideline establishes required content of demonstrations of need as follows:

*The demonstration of need should include the following:*

1. *Demonstrate that there is a need for the proposed use in that particular location. This includes answering the following questions:*
  - a. *Do policies and objectives in the planning authority's applicable planning documents (such as OPs) and relevant provincial policies and plans (e.g. PPS, A Place to Grow) support locating the use in the proposed location? For example, consider policies/objectives related to complete communities, housing diversification, and community amenities.*
  - b. *Are there demographic considerations, such as expected land supply, housing strategy, and forecasted growth or growth targets in population or employment, that would support the use in the proposed location?*



- c. *How will the proposed use, in its proposed location, support the community or other existing uses in the area? For example, does it provide necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing and transportation options and public service facilities?*
          - d. *Are there community amenities and infrastructure (i.e. transportation, servicing) available to support the use?*
          - e. *Is the proposed use to be located within a designated strategic growth area which by nature should include multiple types of uses, such as an MTSA (within the Greater Golden Horseshoe growth plan area) or nodes and corridors generally?*
2. *Identify other locations in the municipality that have been designated and zoned specifically for this use and explain why they have not been chosen for the proposed use.*
3. *Provide a list of at least two alternative locations that have been considered outside of the major facility's AOI and for each, discuss whether they would be appropriate for this use as compared to the preferred location. This discussion should address the same questions presented in #1a-e.*
4. *Identify other potential uses for this particular site that would not be considered incompatible and explain why they have not been chosen for the proposed location.*
5. *The conclusion of the demonstration of the need should discuss why the proposed use in the proposed location is the best option, having considered the answers to the questions presented in #1a-e.*

*Note: unless the proposal relates to an expansion of an existing use, current ownership of property is not a factor that should be considered within the demonstration of need.*

GSAI has no concerns with requirement #1, as it represents valuable planning analysis that would be included in a typical Planning Justification Report. However, requirements #2 through #5 introduce an entirely new set of analyses that must be undertaken in order to justify the proposed development:

Requirement #2 calls for the proponent to explain why alternate sites zoned for the proposed use have not been chosen. No guidance is provided as to depth and breadth of analysis required (i.e. the number of alternate locations and the scope of the explanation as to why they were not chosen).

Requirement #3 would require the proponent to choose at least two other suitable sites and conduct a full planning rationale for the proposed use on each of those sites, using the same criteria from requirement #1. This is an entirely hypothetical exercise. No criteria are provided for how the alternate sites are to be chosen; it is not clear if these sites are to be chosen by proponents or by planning authorities.

In either scenario, the analysis of alternate locations would not be an accurate demonstration of the relative appropriateness of the site for the proposed use. It would be either (a) a demonstration of bias on the part of the proponent or the planning authority (whichever party chooses the alternate locations), or (b) a



completely random exercise. In order for this exercise to provide a true picture of the site's appropriateness relative to alternate sites, the same analysis would have to be completed for every single alternate location, or at least a sufficient number to provide a representative example.

It is also worth noting that requirement #3 requires that the alternate sites be chosen outside of the major facility's AOI, while the requirement applies primarily to proposals within the major facility's MSD. In other words, this requires proponents to justify that development within an MSD is more appropriate than a site that does not even need a compatibility study. Considering the fact that a facility's AOI may be as wide as two kilometres, the alternate sites will, in some cases, be such a large distance away that they are not relevant comparables.

Requirement #4 is also a hypothetical exercise, requiring the proponent to justify why other compatible uses have not been proposed for the property. Again, no guidance is provided as to the depth and breadth of analysis required.

The Demonstration of Need Study goes far beyond justifying a proposed development on its own merits, and would require the proponent to run through a series of hypotheticals to demonstrate that the proposal is more appropriate than all alternative uses and all alternative locations.

We acknowledge that, in accordance with PPS Policy 1.2.6.2 (discussed further below), a Demonstration of Need Study may be required in cases where compatibility studies conclude that there will be some impacts as a result of a proposed sensitive land use's proximity to a major facility. However, the requirements of said study should be greatly reconsidered from what is currently proposed. Moreover, there is no merit for such a requirement where compatibility studies demonstrate that there will be no impact.

Considering the stringent requirements of the Demonstration of Need Study, the impact will be to prevent development of sensitive land uses within MSDs, even where compatibility studies demonstrate the uses are compatible.

## **5. Applicability to Planning Tools**

The D-Series Guidelines apply primarily when a change of land use is proposed, in the form of Official Plan Amendments ("OPAs") and Zoning By-law Amendments ("ZBAs"). Typically, municipalities require compatibility studies for OPA and ZBA applications that would capture a sensitive land use in a major facility's AOI.

Table 4 of the Draft Guideline lists the types of applications for which compatibility studies will be required. The following planning tools would be subject to compatibility studies:

- Official Plan Amendments
- Zoning By-law Amendments
- Holding By-laws (a compatibility study must be completed to lift the H)
- Plans of Subdivision
- Plans of Condominium
- Consents
- Community Planning Permits



Section 1.5.3 also states that the Draft Guideline applies to Site Plan Control and Minor Variances. However, it is not clear if the intent is that compatibility studies be required for these types of applications, as it is not explicitly stated as it is for each planning tool on the list above.

Though the Draft Guideline does not denote which planning tools would be subject to the Demonstration of Need Study requirement, the intent appears to be that it would be applicable to all of the above.

The impact of this will be that compatibility studies and Demonstration of Need studies will be required not only for development within much wider radii around major facilities, but also for the vast majority of *Planning Act* applications, even when the proposal represents an as-of-right land use. Again, this will frustrate the planning process and add additional time and cost to development applications.

We request clarity as to when compatibility studies and Demonstration of Need Studies would be required, and for which types of planning applications, as it is currently unclear when these would be applicable.

## **6. Implementation of PPS 2020**

The concepts of “avoidance” and “demonstration of need” were introduced in the Provincial Policy Statement, 2020 (“PPS”), with policies 1.2.6.1 and 1.2.6.2. The Draft Guideline is intended as an implementation of these policies:

### *1.2.6 Land Use Compatibility*

*1.2.6.1 Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.*

*1.2.6.2 Where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:*

- a) there is an identified need for the proposed use;*
- b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;*
- c) adverse effects to the proposed sensitive land use are minimized and mitigated; and*
- d) potential impacts to industrial, manufacturing or other uses are minimized and mitigated.*

It is our opinion that the Draft Guideline, in its current form, does not meet the intent of Policy 1.2.6.2.

First, a) and b) of Policy 1.2.6.2 constitute the basis of the Demonstration of Need Study. Policy 1.2.6.2 provides that these requirements are triggered “*where avoidance is not possible*”. In other words, need must be demonstrated in cases where there will be some impact from noise, vibration, dust and/or odour. Despite



this, the Draft Guideline requires a Demonstration of Need Study for all sensitive land uses within a major facility's MSD, regardless of the outcome of the compatibility studies. To be consistent with the PPS, a Demonstration of Need Study should only be triggered where the compatibility studies conclude there will be some impacts.

Second, Policy 1.2.6.2 calls for a demonstration of need where a sensitive land use is proposed adjacent to a major facility. Though the PPS does not strictly define the term "adjacent" specifically in relation to Policy 1.2.6.2, it is defined elsewhere in the PPS to mean lands contiguous to other lands. That being said, this definition applies where the term is italicized in the PPS, and it is not italicized in Policy 1.2.6.2. Elsewhere in the PPS (specifically Policy 3.2.1), the phrase "*on, abutting, or adjacent to*" is used, indicating that, in some cases, "adjacent" does not necessarily mean "contiguous". However, it is also clearly differentiated from "in proximity to" (Policy 1.2.4(d)) and "close to" (Policy 1.1.3.8(e)). As such, in the context of Policy 1.2.6.2, the term "adjacent" includes all abutting lands, and in some circumstances may extend a short distance beyond abutting lands. But it cannot mean something as far as "in proximity to", or "close to". The increased radius of MSDs – ranging from 100 to 500 metres – combined with the unequivocal requirement for a Demonstration of Need Study within an MSD, does not reflect the intent of the PPS, as the Study would be required for lands not adjacent to a major facility.

It is our opinion that, in order to be consistent with the PPS, the Draft Guideline should require Demonstration of Needs Studies under significantly reduced circumstances: (a) where the compatibility studies have concluded that there will be some impacts, and (b) only for lands that are adjacent to major facilities, as it is defined in the PPS.

## **7. Impact on Infill, Intensification and Transit-Oriented Development**

Ultimately, the Draft Guideline will place additional burden on development of sensitive land uses, increasing cost and time to reach approval. The increased AOIs and MSDs, combined with the newly-required Demonstration of Need Study, will inhibit development in built-up areas, as the threshold for "compatibility" will be significantly increased.

The impact of the Draft Guideline would be to inhibit mixed-use, transit supportive development, infill and intensification. As such, it is our opinion that implementation of the Draft Guideline will frustrate the achievement of other important provincial policies.

To provide context, Policy 1.1.1 of the PPS provides broad policies to guide future development and land use patterns:

### *1.1.1 Healthy, liveable and safe communities are sustained by:*

- a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;*
- b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and*





- long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*
- c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;*
  - d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;*
  - e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;*
  - f) improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society;*
  - g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;*
  - h) promoting development and land use patterns that conserve biodiversity; and*
  - i) preparing for the regional and local impacts of a changing climate.*

One of the main thrusts of these policies is to encourage efficient, mixed-use development that makes use of existing infrastructure, minimizes land consumption, preserves biodiversity and mitigates climate change impacts. These goals are best achieved via infill, intensification, and generally by compact development within built-up areas. Though we acknowledge the purpose of the Draft Guideline is to implement Policy 1.1.1(d), it will make achievement of many of these other policies more challenging. In our opinion, more regard should be given to balancing these policies, in order to achieve them all without sacrificing others.

The intent of these policies is carried through to the Growth Plan for the Greater Golden Horseshoe. Section 1.2.1 establishes the Guiding Principles:

### *1.2.1 Guiding Principles*

*The successful realization of this vision for the GGH centres on effective collaboration amongst the Province, other levels of government, First Nations and Métis communities, residents, private and non-profit sectors across all industries, and other stakeholders. The policies of this Plan regarding how land is developed, resources are managed and protected, and public dollars are invested are based on the following principles:*

- Support the achievement of complete communities that are designed to support healthy and active living and meet people's needs for daily living throughout an entire lifetime.*
- Prioritize intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability.*



- *Provide flexibility to capitalize on new economic and employment opportunities as they emerge, while providing certainty for traditional industries, including resource-based sectors.*
- *Support a range and mix of housing options, including additional residential units and affordable housing, to serve all sizes, incomes, and ages of households.*
- *Improve the integration of land use planning with planning and investment in infrastructure and public service facilities, including integrated service delivery through community hubs, by all levels of government.*
- *Provide for different approaches to manage growth that recognize the diversity of communities in the GGH.*
- *Protect and enhance natural heritage, hydrologic, and landform systems, features, and functions.*
- *Support and enhance the long-term viability and productivity of agriculture by protecting prime agricultural areas and the agri-food network.*
- *Conserve and promote cultural heritage resources to support the social, economic, and cultural well-being of all communities, including First Nations and Métis communities.*
- *Integrate climate change considerations into planning and managing growth such as planning for more resilient communities and infrastructure – that are adaptive to the impacts of a changing climate – and moving towards environmentally sustainable communities by incorporating approaches to reduce greenhouse gas emissions.*

As with the PPS, the Guiding Principles of the Growth Plan include prevailing themes that inform the policies throughout the Growth Plan, and encourage intensification, complete communities, efficient use of infrastructure, and conservation of biodiversity, among other things.

Once again, as the Draft Guideline would add significant cost and barriers to development in built-up areas, it would frustrate the achievement of intensification, infill and transit-oriented development, because much of the land suitable for said development will be captured within the AOIs and/or MSDs of major facilities. The end result will be a direct contradiction of many of the primary goals of the PPS and the Growth Plan.

## **8. Transitioning**

At this stage, there has been no guidance provided on the transition from the in-effect D-Series Guidelines to the Draft Guideline. As such, it is not clear if the intent is that the new requirements apply to in-process development proposals once the Draft Guideline is finalized.

GSAI requests that in-process development applications be “grandfathered”, and that the D-Series Guidelines continue to apply to development applications submitted prior to finalization of the Draft Guideline. Our clients have made financial arrangements and advanced submissions under the current



regime, and the additional requirements of the Draft Guideline would stall development and put many active applications in jeopardy.

A “grandfathering” requirement would also need to carry from previous land use approvals granted to all future land use approvals for the lands subject to the current land use approvals regime. This further ensures certainty for both landowners and the approval authorities that land use permissions granted now are not reversed or severely impacted with new requirements imposed during a potential site development plan or consent application on lands that have already been subject to the Ministry guidelines. Without this, there may be situations such as granting of Official Plan Amendments by approval authorities where land uses allowed may not be permissible a few years later.

### **Concluding Statement**

In summary, while we recognize the important role MECP serves in preventing land use incompatibilities, we have a number of requests, recommendations and concerns with regards to the Draft Guideline, summarized as follows:

- We request further information justifying the extreme increase in the MSDs and AOIs around major facilities, or that these distances be reduced to reflect empirical data.
- We recommend that the requirement for compatibility studies for all development of sensitive land uses within a major facility’s AOI be reconsidered. The proposed AOIs are, in many cases, so large that a compatibility study would be unnecessary.
- We recommend that, should Demonstration of Need Studies be required, they be imposed only on proposals for new sensitive land uses that are adjacent to major facilities, where compatibility studies have concluded there will be some impact. This will reflect the intent of PPS Policy 1.2.6.2.
- We request that additional guidance be provided to assist proponents in the preparation of Demonstration of Need Studies, and that the requirements for said Studies be reduced. In their current form, they include several requirements that do not involve justifying proposals on their own merits.
- We recommend that more consideration be given to balancing land use compatibility with the efficient development of complete communities, as the Draft Guideline, in its current form, will frustrate development, increasing costs and barriers, and ultimately dissuade proponents from developing lands within built-up areas.
- We recommend that in-process development applications be “grandfathered” and that, once it is finalized, the Draft Guideline apply only to new development proposals.
- We request that the Province not rush to implement the Draft Guideline. More time should be provided for consultation with impacted parties, including industry professionals, landowners, and members of the public, to refine the Draft Guideline and ensure it does not become a hindrance to achieving other provincial planning and growth priorities.



Glen Schnarr & Associates Inc. would like to thank the Ministry of the Environment, Conservation and Parks for the opportunity to provide comments on Draft Land Use Compatibility Guideline. **Please continue to keep us updated on matters related to the review process.** If you have any questions regarding these comments, please do not hesitate to contact the undersigned.

Yours Truly,  
GLEN SCHNARR & ASSOCIATES INC.

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Glen Broll, M.C.I.P., R.P.P.  
Partner

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Stephen Closs  
Planner