



To: Mayor and Council

From: Danielle Waters, Community Planner

Meeting Date: February 24, 2025

Subject: PB-002-2025 – Region of Huronia Official Plan Amendment

and Zoning By-law Amendment

### Recommendation

Be It Resolved that Council of the Township of Clearview hereby receive report PB-002-2025 (Region of Huronia Official Plan and Zoning By-law Amendment) dated February 24, 2025; and,

- That Council finds that the applications are consistent with and conform to Provincial policies, as well as with the objectives and intent of the County and Township Official Plans, and has considered all comments received;
- 2) That Council adopts Official Plan Amendment No. 2 to the Clearview 2024 Official Plan through the passing of By-law 25-16, being presented at the February 24, 2025, Council meeting;
- 3) That Council directs written notice of the adoption of the Official Plan Amendment in accordance with Sec. 17 of the Planning Act;
- 4) That Council directs staff to forward the Official Plan Amendment along with all supporting material to the County of Simcoe for approval;
- 5) That Council directs staff to bring forward a By-law consistent with the draft included as Appendix 'F' to amend Zoning By-law No. 06-54 at such time as the Official Plan Amendments area approved by the County of Simcoe; and
- 6) That Council directs staff to give notice of the passing of Zoning By-law Amendment located in Appendix 'F' in accordance with Section 34 of the Planning Act at such time as the By-laws are adopted.

# **Background**

On May 3, 2024, the Township received an Application for Official Plan and Zoning Bylaw Amendment and on May 24, 2024, deemed the application complete. The public meeting was held on June 26, 2024. The Township deemed the application complete based on the submission of the following information:

 Completed and signed application for an Official Plan Amendment and Zoning By-law Amendment.

- One (1) cheque totalling the amount of \$14,500.00 representing the requisite, application, and deposit fee(s).
- Site Plan Concept
- Landscape Plan Concept
- Site Survey Boundary & Cells
- · Geotechnical Engineering Report
- Hydrogeological Assessment
- Stage 1 & 2 Archaeological Assessment
- Agricultural Impact Assessment
- Planning Justification Report Draft OPA Schedule and Text, Draft ZBA Schedule and Text
- Air Quality Land Use Compatibility Study
- Groundwater Monitoring
- Natural Hazard Assessment
- Digital Submission
- Pre-Consultation Comment and Response Matrix
- Pre-Consultation Checklist and Response Checklist
- ECA License Recorded
- Site Plan Agreement 2006 Copy

# **Subject Lands**

The subject property is located just outside of the settlement area of New Lowell. The lands are on the corner of County Road 9 and County Road 10, New Lowell. The subject lands are approximately 41.3 ha with a frontage of approximately 340 m along County Road 10. The subject property is surrounded by agricultural lands. The Coats Creek traverses the property. Current uses on the subject lands include:

- Nine (9) existing sewage treatment lagoons;
- Region of Huronia Environmental Services Ltd. (ROHES), occupies the southwest corner of the site which includes the companies head office, storage sheds, shops, and equipment and truck parking is located here;
- A cell tower located close to County Road 10, that is lease land;
- A residential dwelling and accessory uses;
- The majority of the lands are farmed by the owner/applicant.

ROHES provides an extensive list of services such as pumping, transport, storage and disposal of municipal, commercial and residential biological waste. The lagoon operations have existed on-site since 1995, with the original ECA (#A74001) issued on February 9th, 1995. An existing Site Plan Agreement is entered between the Applicant and Township, dated June 12th, 2006.

On-site there is only liquid materials are stored in the lagoons. The lagoons store Non-Agricultural Source Material (NASM), once it is treated (Bio-solids), which is material generated from non-agricultural sources and is applied to agricultural land to provide a beneficial use. The lagoons further store Agricultural Source Material (ASM), which comes from local agricultural operations.

For location context and surrounding land uses, please see the Orthophoto (Appendix A). For the planning policy context, please see the Planning Policy Map (Appendix B).

#### **Proposal**

The applicant has applied for an Official Plan and Zoning By-law Amendment. The effect of the applications is to facilitate the expansion of the existing sewage treatment facility (lagoons) to increase the facility capacity and allow for the construction of a new operations shop as an accessory use. The following is a breakdown of the proposed plan:

- Ten (10) new lagoons are proposed, expanding operations from the nine (9) existing lagoons to a total of nineteen (19);
- Access road is to be reconfigured for the new cells;
- Hauled sewage receiving station;
- · Operations shop to replace existing structures.

The subject lands will also be subject to a site plan approval application in the future.

#### Required Application - OPA

The proposal requires an amendment to the Townships Official Plan. The application will bring the Official Plan into conformity with the Zoning By-law and allow for the sewage lagoons to exist and expand, with the support of all required studies submitted. The amendment will redesignate the following:

- The Transfer Storage Lagoons will be designated 'Waste Management Industrial'.
- The applicant has submitted a Natural Hazard Assessment (NHA), where it was
  determined that a portion of the 'Greenland Natural Heritage Areas' were
  outside of flooding concern. The 'Agricultural' designation will reflect the existing
  uses in this area.
- Remove the Waste Management Industrial designation near the front of the property that was created for hazardous waste. This has been determined to have never been built and is proposed to be returned to the 'Agricultural' designation through the subject applications.

Description Of Area	Original Designation	Amended Designation
Transfer Storage Lagoon	'Greenland - Natural Heritage Areas'	'Waste Management Industrial'
Transfer Storage Lagoon	'Agricultural'	'Waste Management Industrial'
Agricultural Fields	'Greenland - Natural Heritage Areas'	'Agricultural'
Special Liquid Waste Storage and Transfer (OPA 5 2001)	'Waste Management Industrial'	'Agricultural'

#### **Required Application - ZBA**

The proposal requires an amendment to the Township's Zoning By-law 06-54. The amendment will address the proposed expanded uses on site. The amendment will rezone the following:

- Increase the zoning size of the 'Waste Management Industrial' zone, and add an exception to limit the use to a Transfer Storage Lagoon;
- Rezone a portion of the lands to 'Environmental Protection' to reflect the submitted NHA;
- Rezone a portion of the lands from 'Agricultural/General Industrial' to 'Agricultural Exception', to allow for the accessory business use of a Truck Terminal to the Transfer Storage Lagoon.

# **Comments and Analysis**

Provincial policies, Township Official Plan and Zoning By-law establish criteria for evaluating an application for an amendment. All applicable criteria, policies, standards and comments received are analyzed below in the context of the subject applications.

It is acknowledged that ROHES creates a product where the end user of the product is the agriculture community and is a very important resource for crop farmers. As per the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas, Section 2.2.3 provides examples of uses that would typically not be 'agriculture-related' such as:

- Sewage biosolids storage and composting facilities for 'non-agricultural' source material, and
- Trucking yards.

Because most of the source material is non-agricultural material, the review of this application has been done through a 'non-agricultural' use lens, however, it is important to review additional policies that would support this 'non-agricultural' use in an agricultural area. The end product from the storage lagoon is used on farm operations in the area, supports agriculture, and the business directly benefits from and is required to be located in proximity to farm operations. The end product is sold and distributed to agricultural operations surrounding the subject site, therefore, it is critical that this use be located (and expanded) on the subject location.

## **Existing Policy Framework**

The lands are designated by the Official Plan as 'Agriculture', 'Waste Disposal Industrial', 'Greenland – Wetlands Areas', 'Greenland – Hazard Land Areas', and 'Greenland – Natural Heritage Areas'.

The lands are zoned as 'Waste Disposal Industrial (MW)', 'Environmental Protection (EP)', 'Agricultural (AG)', 'General Industrial (MG)', and 'General Industrial Zone Exception 1 (MG-1)' in the Township of Clearview Zoning By-law 06-54.

A portion of the lands are also within the regulated area of the Nottawasaga Valley Conservation Area (NVCA) due to Coats Creek traversing the property.

# **Provincial Planning Statement, 2024**

The Provincial Planning Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. The intent of the PPS is to build strong and healthy communities while at the same time, promoting efficient land use and development patterns.

The PPS (sec. 3.5 - land use compatibility) aims to ensure that land uses are compatible, and 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. An Air Quality Land Use Compatibility Study (D-2) has been completed by WSP and submitted in support of the proposed use to demonstrate that there are no adverse impacts to adjacent lands.

As provided in the Agricultural Impact Assessment (AIA) the MDS guidelines state temporary field nutrient storage sites (as defined under the Nutrient Management Act 2002) are not required to have MDS setbacks. ROHES lagoons are regulated under the Nutrient Management Act and therefore are not subject to MDS guidelines. The AIA was reviewed by the Township's consultant, Stovel and Associates Inc (SAI). The appropriate changes were made to the applicants Planning Justification Report (PJR) and AIA to reflect the non-agricultural use.

The PPS (sec. 3.7 - waste management) speaks to the need for waste management systems to be planned for and ensure that they are of an appropriate size, type, and

location to accommodate present and future requirements. The Planning Justification Report (PJR) submitted by IPS, provides justification and reasoning for the appropriateness of this use to be in its current location and the benefits of expansion. The owner/applicant has indicated the need for the expansion, given the current lagoons are at capacity, and the community as a whole can benefit from this expansion.

The PPS has a goal of protecting natural features (sec. 4.1), water quality (sec. 4.2), and protection of people and property (5.2). A Natural Hazard Assessment and Hydrogeological Assessment has been submitted in support of this application. These documents have been reviewed by NVCA, and it is determined that there is no environmental risk to the expansion of the lagoons. NVCA provided supportive comments to reduce the Greenlands designation on the front portion of the property, however, indicated that an expansion of the EP zone was necessary to ensure the hazards lands are zoned correctly.

As determined through review of policy guidelines, it has been determined that the Lagoon use, as well as the Truck Terminal, is a 'non-agricultural' use due to the majority of source material being non-agricultural. Despite this, it should be noted that the definition of 'agricultural-related use' is commercial and industrial uses that are related to farm operations in the area, support agriculture, benefit from being in close proximity to farm operations and provide direct products and/or services to farm operations and are the primary activity on site. This definition further supports that, while the expanded use is being labeled as a 'non-agricultural' use, in many ways it is indicated as a supportable use within the agricultural community. In accordance with sec. 4.3.5 of the PPS, Planning authorities may only permit non-agricultural uses in prime agricultural areas for limited non-residential uses, provided that all of the following are demonstrated:

PPS Sec. 4.3.5 Test	Planning Staff Comment
the land does not comprise a specialty crop area;	As per the AIA, the lands are not within a speciality crop area.
the proposed use complies with the minimum distance separation formulae;	As per the AIA, the use is not required to meet MDS setbacks.
3) there is an identified need within the planning horizon identified in the official plan as provided for in policy 2.1.3 for additional land to accommodate the proposed use; and	ROHES provides a service not only to those outside the municipality, and individual property owners but their largest clients are Municipalities, including the Township of Clearview itself. With a growing population, it is important

PPS Sec. 4.3.5 Test	Planning Staff Comment
	to have businesses such as ROHES in operation to support the community from a producer (residences, municipalities) and consumer (farmers) standpoint.
4) alternative locations have been evaluated, and i) there are no reasonable alternative locations which avoid prime agricultural areas; and ii) there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.	The proposed application is for an expansion of an existing use, therefore, with the supportive studies submitted, it is reasonable for this use to expand in this location.
5) Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.	An AIA was submitted in support of this application, which indicated the appropriateness of the lagoon and accessory uses within the agricultural area.

The proposal is consistent with the Provincial Planning Statement (2024) issued under the *Planning Act*.

# **County of Simcoe Official Plan (2016)**

The subject lands are designated 'Agricultural' and 'Greenlands' in the County of Simcoe's Official Plan.

Policy 4.12.6 of the County of Simcoe Official Plan discusses that the intent of the Plan is to not to prevent the continuation, expansion or enlargement of legally existing uses on existing lots. The use is located in the 'Agricultural' designation and will be expanding into the same.

"This Plan is not intended to prevent the continuation, expansion or enlargement of legally existing uses on existing lots which do not conform to the designations of the Plan. Expansions or enlargements shall include consideration of Section 4, Policy Statements within this Plan, local official plans and bylaws, and where

applicable, be subject to the Niagara Escarpment Plan, Greenbelt Plan, Growth Plan, Lake Simcoe Protection Plan and the Oak Ridges Moraine Conservation Plan".

Township staff have been in communication with County of Simcoe staff throughout the evolution of this proposal. County staff have not indicated the requirement for a County OPA, rather using Policy 4.12.6 to allow for the expansion of this existing use.

Policy 3.6.12 reflects requirements to be met for a non-agricultural use in a prime agricultural area. These requirements are reflected in the justification under the PPS and Township OP polices within staffs' report. The applicants PJR has been revised to reflect the non-agricultural use. The operations shop is an existing use. The proposed new shop is to be constructed to replace several existing structures that will be removed. The proposed ZBA will limit the developed area to the existing size of the site, thus an increase in developed area will not occur.

The proposed application conforms to the general intent and purpose of the County of Simcoe's Official Plan.

### Township of Clearview Official Plan (2024)

The proposed amendment will make changes to Schedule B, B-8, SP-6 and F of the Official Plan and policy changes including the addition of 'Special Policy Area 13.6.1 Region of Huronia Lands'. As part of the rezoning application, an exception is being added to the Agricultural zone to allow for an existing 'non-agricultural' use. The Truck Terminal is in support of the Transfer Storage Lagoons as an accessory use. Section 3.3.4.5 non-agricultural uses in the "Agricultural" designation shall:

	OP Sec. 3.3.4.5 Test	Planning Staff Comment
1.	comply with applicable MDS formulae	Criteria #3 of the MDS guidelines state temporary field nutrient storage sites (as defined under the Nutrient Management Act 2002) are not required to have MDS setbacks. ROHES lagoons are regulated under the Nutrient Management Act. When the applicant applies for site plan, with the exact location of the proposed operations shop, an MDS calculation may be required.
2.	be required to mitigate all impacts on surrounding agricultural operations and lands to the fullest extent feasible.	The proposed expansion will not impact operations on the subject lands, nor will it have any impacts on surrounding agricultural operations. The proposed use

	will support the surrounding operations. Any detailed design requirements to mitigate impact (such as fencing and landscaping buffers) will be reviewed at the Site Plan Application stage.
not be located in any specialty crop area.	The proposed use is not within a specialty crop area.
4. be required to demonstrate that:  (a) all available designated lands are unsuitable for the proposed use;  (b) there are no reasonable alternative locations for the proposed use that avoid prime agricultural areas; and  (c) there are no lower-priority agricultural lands that could accommodate the proposed use available.	The use is expanding on an existing use on the property. It is reasonable to expand this use in its current location due to proximity to the end user.

Section 4.5.2 Waste Management Industrial (WMI)' designation, identifies the locations of active and closed waste management sites. These sites are (or were) used for the storage and disposal of municipal solid waste or of hazardous and liquid wastes. Currently, the Transfer Storage Lagoons are within the Agricultural designation, however, they are in a 'Waste Disposal Industrial' zone. This OPA works to bring the Official Plan in line with the zoning and existing use on the property. Permitted uses in the WMI designation are:

- (a) publicly or privately operated waste management sites; or
- (b) facilities for the handling, storage, or disposal of hazardous waste or of liquid waste (as those terms are defined in the regulations under the Environmental Protection Act)

Before approving an application made under No. 4.5.2.3, Council shall be satisfied that:

OP Sec. 4.5.2.3 Test	Planning Staff Comment
a) the proposed use will have no	A Natural Hazard Assessment and
negative impacts on natural	Hydrogeological Assessment has been
heritage features or areas,	submitted. The assessments have beer
including wetlands, significant	reviewed by NVCA, and they have no

woodlands, and sensitive wildlife habitat or fish habitat;	objections to the proposal moving forward. An NVCA permit will be required.
b) the proposed use will have no negative impacts on groundwater or surface water resources;	Groundwater monitoring, Geotechnical and Hydrogeological studies have been submitted. As a part of ECA requirements, ROHES is consistently monitoring the property to ensure no negative impacts occur.
c) the proposed use will be adequately separated, buffered, and screened from adjacent land uses, and accessory buildings and structures appropriately set back from adjacent properties and uses;	The existing use is not visible from the road and appears as large berms at the rear of the property. The lagoons are not built into the ground but elevated with large berms. This provides separation and screening for surrounding properties. Any detailed design requirements to mitigate impact (such as fencing and landscaping buffers) will be reviewed at the Site Plan Application stage.
d) the site has access to public roads capable of supporting the traffic generated by the proposed use;	The site has an internal road network to support the use and is located on a County road. A Traffic Study is required at the time of Site Plan approval.
e) proposed haulage routes will be adequate in terms of anticipated traffic volumes and impacts of the proposed use on transportation;	The site is located on a County road. The County has provided comments requiring a Traffic Study. This will be submitted with a subsequent Site Plan Application.
f) any potential hazards associated with the proposed use have been identified and addressed, with appropriate measures in place for dealing with all such hazards;	All appropriate studies as determined at the pre-consultation stage have been submitted. The site is controlled by the Nutrient Management Act, and as such requires an ECA approval. Any hazards associated with the proposed use will be mitigated and monitored through the ECA approval.
g) the proposed rehabilitation plan is adequate and contemplates improvements consistent with the	If required for the ECA permit, a rehabilitation plan should be submitted to

character of the surrounding	the Township as a part of the Site Plan
landscape.	Application.

In section 4.5.2.14, the requirement for a holding provision and D-4 assessment area is required to be placed on the lands and surrounding area. A D-4 assessment relates to requirements for a Landfill. The existing and expanded use will fall under a D-2 study which has been submitted. As part of the amendment the lands will be added to the Waste Management Sites in 'Schedule F', and the appropriate D-4 Assessment Area applies, noting that a D-2 study, not a D-4 study would be required for any future applications. A holding provision will not be added as this is a requirement for a 'landfilling' use, which the lagoons are not, however, it has been deemed appropriate to add the use as a Waste Management Site for the requirement of a D-series study.

The subject lands currently have a small WMI designation for 'special liquid waste storage and transfer' close to the operations shop on site. This is a legacy OPA/ZBA approval that was never constructed or utilized. Through consultation with the owner, it was determined that this is no longer needed, and the designation and zoning exception are proposed be removed from the site. It is appropriate for the Transfer Storage Lagoons, be redesignated to the WMI designation, to accurately reflect the existing use and allow for the expansion.

Section 7.4 Waste Management discusses the establishment or expansion of waste management sites. Where a waste management site is privately owned and operated, the private owner is be responsible for the development, operation, monitoring, maintenance, and rehabilitation of the waste management site in accordance with applicable legislation.

The D-series, provides guidelines for land use compatibility. As previously discussed, a D-4 study is required to address concerns for landfilling. The use of the lagoons does not require landfilling and instead requires a D-2 study to determine the compatibility between sewage treatment and sensitive land uses. A D-2 study has been submitted in support of the application. As part of the amendment the lands will be added to the Waste Management Sites in 'Schedule F' to the Official Plan.

The 'Greenlands' designation (sec. 4.9) constitute the natural heritage system, within the Township. The boundaries of the Greenlands designations are considered to be approximate. Adjustments to the boundaries of any of the "Greenlands" designations maybe made as determined through more detailed mapping or field surveys or the results of an EIS, provided that the overall intent of this Plan is maintained. The applicant has provided an NHA that provides mapping that accurately delineates the hazards associated with Coats Creek. The NHA has been reviewed by NVCA, and it has been determined that a portion of the 'Greenlands' designation is overreaching and can be refined. Appendix 'G' outlines the redesignation of a portion of the lands to Agricultural, and a portion to the Waste Management Industrial designation. It should be

noted, that while the Greenlands OP designation is overreaching, the EP zoning is underrepresented and is proposed be expanded to align with the NHA.

The proposed application conforms to the general intent and purpose of the Township's Official Plan.

## Clearview Zoning By-law (06-54, as amended)

The Townships Zoning By-law implements the objectives and policies of the Townships Official Plan. An outline of the schedule changes to the Zoning By-law can be found in Schedule 'F' of this report.

The proposed application will create the 'Waste Management Industrial Exception 2 (MW-2) Zone'. The expansion of the lagoons is into the 'Agricultural (AG)' zone, with the existing lagoons being in the 'Waste Disposal Industrial (MW)' Zone. An exception has been added to the designation on the existing and proposed lands, to narrow the uses within the MW zone. The MW zone allows for a variety of waste uses such as a landfill. Staff determined that at this time, the general permitted uses in the zone would not be appropriate. Exception 2 will only allow for a Transfer Storage Lagoon with the appropriate MW provisions. The definition of Transfer Storage Lagoon has been revised to allow for accessory buildings such as a Hauled Sewage Receiving Station. Details for the exception can be found in Appendix F.

The proposed application will create the 'Agricultural Exception (AG-xx) Zone'. The front portion of the lands is currently zoned 'Agricultural (AG)', 'General Industrial (MG)', and 'General Industrial Zone Exception 1 (MG-1)'. The MG zone is in place to recognize the use of several structures in support of the Transfer Storage Lagoons. ROHES has an office building, several operational shop buildings, an on-site refueling station and parking area for trucks.

The MG-1 zone permits an underground storage facility for the purposes of storing organic waste such was gasoline, spill cleanup residues etc. It has been determined that this use never commenced on the property and the zoning and designation will be removed as per discussions with the owner.

The rezoning application will create one cohesive exception zone for this area being 'Agricultural Exception xx (AG-xx). The use of an AG Exception zone has been determined to be a more appropriate way to regulate this use. The current Industrial zone is broad in nature and limited to a specific location on the site. This zone will allow for the non-agricultural use of a Truck Terminal as an accessory use to the Transfer Storage Lagoon. It should be noted that this use is specifically tied to the Transfer Storage Lagoon use, and at such time the Lagoon use ceases on the property, the Truck Terminal will not be permitted. Through consultation with the owner, they are looking to remove several structures and construct one large operational shop. The building will be used for a combination of the ROHES business and farm equipment in

support of the agricultural operation on site. Once the existing structures and parking area are moved, the lands will be returned to farmland. With this in mind, the exception has been applied to a large area at the front of the property, however, it restricts the developable area of this use to match the approximate size of the existing area the business has developed. It is noted that through this redevelopment, the existing structures may remain in place, until such time that the new building has been constructed. Developable area is to include structures and parking areas to support the use.

An existing definition for Truck Terminal exists in the zoning by-law and describes all uses for the existing ROHES operations area.

"TRUCK TERMINAL Means a building and/or lot used for the parking or storage of trucks which are used for the purposes of delivering or transporting goods and materials and may include facilities for the repair and servicing of those trucks along with associated administrative offices and warehouses for the temporary storage of materials transferred or transported by vehicles using the terminal."

Through review of the NHA and consultation with NVCA, it was determined that the existing Environmental Protection (EP) Zone does not sufficiently cover what should be on the lands. Additional EP zoning has been added to the lands, which reflects the limit of the NVCA regulated area and the 'Greenlands' designation within the Official Plan. The lands in these areas are farmed, and this use may continue as it is a permitted use within the EP zone.

The proposed applications conform to the general intent and purpose of the Township's Zoning By-law.

#### Conclusion

Through review of Provincial, County and Township policies, Staff are satisfied that the proposed expansion to an existing use, is appropriate development for the lands. The expansion of ROHES's existing operation will support the local agricultural community, and economic growth for the region. Maintaining the current location for the operation is beneficial to have the product close the end user of the product. All required documents have been submitted in support of the application, and any additional reports will be required at the Site Plan Approval application stage.

#### Consultation

Appendix C and D show all comments received and a response summary table.

#### **Financial Implications**

Potential financial and legal implications should the decision of the Council be appealed to the Ontario Land Tribunal (OLT) and Council chooses to defend the Committee's decision.

# **Clearview's Strategic Plan**

Communication

# **Report Appendices**

Appendix A – Ortho Map

Appendix B – Policy Map

Appendix C – Table of Comments and Response Summary

Appendix D – Comments Received

Appendix E – Conditionally Approved Site Plan

Appendix F – Draft Zoning By-law Amendment

Appendix G – Draft Official Plan Amendment

# **Approvals**

**Submitted by:** Danielle Waters, MSc., RPP, Community Planner

Reviewed By: Rossalyn Workman, MURP, Dipl.MM, MCIP, RPP, Manager

of Planning

Amy Cann, M.PL. MCIP, RPP, Director of Planning &

**Building** 

**Financial Implications** 

Reviewed by:

Kelly MacDonald, Treasurer

**Approved by:** John Ferguson, CAO