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September 29, 2024

Ms. Sabrina Pandolfo
Clerk
Municipality of Temagami
Box 220
Temagami, Ontario
POH 2H0

Dear Ms. Pandolfo:

Re: Draft Official Plan, version 2

On behalf of my client the Temagami Lakes Association, I would like to provide Council, staff, and your planning consultants with the TLA's and my comments on Draft 2 of the new Official Plan. This draft goes a long way to address concerns we raised with the previous draft in our letters of February 28 and April 18, 2022, as well as an email directly to MHBC, February 28, 2022. The TLA and I very much appreciate this progress.

The TLA continues to strongly support a new and up-to-date Official Plan. Draft 2 largely meets that objective. However, the TLA and I still have some concerns. As you are now approaching a final version of the Plan to be proposed for Council adoption, in this letter we will focus on specific recommendations for change. These recommendations are in ***bold italics***, and where we propose changing existing draft text, the whole is in italics but only the changes are in bold. We will provide rationale where required, but in the interest of brevity, we refer back to our 2022 letters if that rationale was already provided there. In responding to Draft 2, we have also reviewed MHBC's staff report of August 22, 2024 and we appreciate the effort made in the Comment Response Table to respond to the points we made at that time.

Schedule A

We have taken a closer look at the mainland lots in the Lake Temagami Neighbourhood that are to be designated Restricted Rural/Waterfront - Lake Temagami, or Tourist Commercial.

It appears that the standard MHBC parcel fabric has been used, and that it has been assumed that all parcels delineated in the parcel fabric are patented lots. However, this is not actually the case. Many of the parcels (and that also includes those shown on the bed of Lake Temagami that have not been designated) appear to be lapsed or expired mining claims, in other words they are Crown with no disposition of use rights. Others are subject to mining leases but remain Crown-owned.

Our preliminary conclusion is that there are five patented lots on the mainland: the two that are designated Tourist Commercial, and three of those designated Restricted Rural/Waterfront - Lake Temagami. The rest of the parcels in the latter designation are Crown-owned.

To ensure there is no inappropriate designation of Crown lands, we therefore recommend that ***the ownership of all mainland parcels in the Lake Temagami Neighbourhood be reviewed, and that all parcels found to be in Crown ownership be redesignated Crown Land.***

We also recommend that the following interpretive provision be added as Section M.1.3.4:

All lands whose surface rights remain in Crown ownership are designated as Crown Land, or if within a provincial park or conservation area, Crown Land - Protected Area, despite any designation to the contrary on Schedule A.

Schedule D

The waste transfer station at the end of the Lake Temagami Access Road is shown as a former waste management site, but this is actually an active, licensed site.

Section A.3.1.2 - references to Crown land planning policy

This section still does not refer correctly to the proper source for MNR planning policy for Crown lands in the Municipality. (See February 28, 2022 letter for further discussion.)

We recommend the first sentence read:

Notwithstanding the valuable input received during the Official Plan Review and the resulting Official Plan policies, the Municipality of Temagami acknowledges that the Crown Land Use Policy Atlas is the governing land use planning document applicable to Crown Land within the Municipality of Temagami—except in the geographic Township of Sisk.

Section C.1.1.1 - population

We believe the 2021 Census figure of 496 seasonal dwellings (derived from 928 total and 432 permanent) is not reliable and a serious underestimate. TLA and the Municipality cooperated in estimating a much higher number in 2020. (See February 28, 2022 letter for further discussion.) If the Municipality is not comfortable with the 2020 estimate, then we recommend this section read:

Based on the 2021 Census, the permanent population of the Municipality was 862. There are 928 private dwellings and 432 of those dwellings are occupied permanently throughout a year. The Municipality provides recreational properties for a number of seasonal residents and tourists. Youth camps, Provincial Parks, tourist lodges, canoeists, and extended cottage use greatly increase the seasonal population.

As well, the population of Bear Island and the total community memberships of TFN and TAA should be mentioned and recognized. (See February 28, 2022 letter for further discussion.) We recommend ***that MHBC obtain the correct information that reflects both groups and add an appropriate paragraph.***

Section C.1.2.2 - location of population growth

We believe that this section, though revised, still does not make clear that the Lake Temagami Neighbourhood and other non-road-accessible locations should not be part of any population growth objective. (See February 28, 2022 letter for further discussion.) We recommend the first sentence be replaced with:

*Although difficult to quantify, it is anticipated that **there may be some growth of permanent population in the rural areas and shoreline areas as a result of conversion of seasonal residences to permanent residences. However, it is the policy of the Municipality that housing intended to accommodate permanent population growth be confined to the Urban Neighbourhood and other road-accessible locations.***

Section D.2.1.1 - Lake Temagami Neighbourhood description

This needs to be corrected to reflect the addition of Cross Lake. We recommend this section read:

*The Lake Temagami Neighbourhood is shown on Schedule A and includes islands and mainland areas contained within the Skyline Reserve around Lake Temagami **and Cross Lake**, but excludes ~~the~~ Bear Island.*

Section D.2.2.1 and other sections - references to Crown land planning policy

As discussed with reference to other sections in my February 28, 2022 letter and email, the Temagami Land Use Plan of 1997 and its Area 39 have been subsumed into the Crown Land Use Policy Atlas. Area 39 no longer exists and it is not entirely clear what CLUPA areas correspond to it. We recommend the first sentence read:

*The land use strategies for this Neighbourhood are based upon the Tenets for Temagami and the **applicable provisions of the Crown Land Use Policy Atlas.***

Similarly, in sections D.2.6.8 and E.13.4.1, "Temagami Land Use Plan", and in section E.13.1.1, "Temagami Land Use Plan for the Temagami Comprehensive Planning Area, (MNR, 1997)", **should be replaced with "Crown Land Use Policy Atlas"**.

Section D.2.3.1 - Lake Temagami Neighbourhood principles

We recommend below that sections D.2.6.10 and E.6 be deleted. We believe that as a result, some parts of section D.2.3.1, which would appear to provide a basis for the sections we propose to delete, are no longer appropriate.

We recommend this section read:

It is the fundamental principle of the Municipality that private residential development and commercial development in the Lake Temagami Neighbourhood shall only be permitted on the islands in Lake Temagami. This type of development is not permitted within the Skyline Reserve around the lake. It is also a fundamental principle that no

*further unauthorized access be permitted to Lake Temagami. **The Municipality recognizes that there is a need for improvements at the access point and supports such improvements**~~a need to provide mainland opportunities for services that support the residents and business on Lake Temagami. The Municipality supports the development of an improved access point and limited opportunities for service providers to have mainland access to Lake Temagami.~~ These considerations will be carefully planned and managed in accordance with the policies of this Plan.*

Section D.2.3.4 - lot creation cap

We appreciate the addition of this section. However, it is not clear as it is in the present Plan, section 5.3.7.1, that the annual limit cannot be cumulative.

We recommend that this section read:

*On Lake Temagami, a maximum of five (5) lots from patented or Crown Land shall be permitted per **calendar** year (**non-cumulative**) through lot creation applications.*

Section D.2.6.4 and Schedule D - Skyline Reserve definition

We are happy with the changes that have been made. We recognize that the mapping of the Skyline Reserve perimeter on Schedule D, which is the same as the Lake Temagami Neighbourhood perimeter on Schedule A, is unchanged from the 2004 and 2013 Plans, aside from the welcome addition of Cross Lake.

In order to ensure that the mapping of the Skyline Reserve is properly historically benchmarked in order to protect it from unjustified future alteration, we have looked further into the prior basis and history for this delineation.

The Municipality's first Official Plan was approved in 2004. That is where the present mapping of the Skyline Reserve (aside from Cross Lake) appears to originate. Section 5.3.17 of that Plan says that "[t]he Skyline Reserve is defined as the line delineating Management Area 39 in the Temagami Land Use Plan for the Temagami Comprehensive Planning Area, MNR 1997". But though the present Skyline Reserve is similar to Area 39, it is not the same. On what basis the present Skyline Reserve was mapped in the 2004 Plan is unknown and at this late date, will no doubt remain so. However, its exterior boundary has been established and accepted in Municipal, Provincially-approved policy for 20 years now.

We would like to see absolute clarity in the text, that the Skyline Reserve and Lake Temagami Neighbourhood boundaries are the same, and regarding the historical foundation of these boundaries. Therefore, we recommend this section now read:

*The Skyline Reserve is of varying depth back from the shoreline of Lake Temagami and Cross Lake. It consists of the entire mainland shorelines of Lake Temagami and Cross Lake within the Lake Temagami Neighbourhood, and is shown on Schedule D to this Plan. **The external boundary of the Skyline Reserve on Schedule D, and the external boundary of the Lake Temagami Neighbourhood on Schedule A, are one and the***

same. The Skyline Reserve's external boundary is intended to remain as originally delineated in the Municipality's 2004 Official Plan, except for the addition of Cross Lake in the present Plan. The Skyline Reserve's external boundary reflects Crown forest management dating back to 1935, as currently expressed in the Crown Land Use Policy Atlas.

Section D.2.6.6 - Skyline Reserve permissions

In the first paragraph, the permitted use "water based camping" could possibly be construed as floating accommodation, a recent troublesome issue and we are confident, certainly not what's intended.

We recommend "water based camping" be changed to "***water-accessible camping***".

We appreciate the addition of the second paragraph, taken from section 5.3.17 of the present Plan.

However, we have some concerns about this paragraph. First, there is perhaps unintended ambiguity in the first sentence, as to what are the "specific" parcels. Second, there is potential ambiguity about the relationship between the uses listed in the first paragraph and the uses described in the second. Third, we are also concerned about the discretion inherent in allowing Council or delegated staff to deem certain improvements to be "minor" on a case-by-case basis. This uncertainty could be resolved by having the site plan control bylaw define what is minor and does not need site plan approval on these lots. Fourth, while new structures should be permissible on the lots designated Tourist Commercial, they should not be permissible as-of-right on the three lots which should be properly designated Restricted Rural/Waterfront - Lake Temagami.

Therefore, we recommend this section read:

*Uses permitted on **patented lands** on the mainland within the Skyline Reserve shall be limited to **the permitted uses listed above and any other** legal uses legally existing on those specific parcels on the date of adoption of this Plan by Council. Any new structures or modifications to the existing structures except those deemed to be minor **in accordance with provisions of the Site Plan Control By-law** shall be subject to site plan approval. No new structures shall be permitted on lands designated Restricted Rural/Waterfront - Lake Temagami.*

Section D.2.6.10 - Skyline Reserve - Northeast Arm development

The concerns we raised in our February 28, 2022 letter have not been addressed. The purpose of these provisions, and where they would apply, are unclear. They appear to invite development on mainland properties contrary to the intent of sections D.2.6.5 and D.2.6.6. This potential conflict was acknowledged in the Comment Response Table, but not resolved.

In fact, this section could apply to only one existing patent, Boatline Bay Marina, or to future dispositions of Crown lands. Boatline Bay already has its own special policy, E.7.7.1, which could be considered for site-specific amendment if desired. As well, the creation of any new development along the south shore of the Northeast Arm should be subject to Official Plan

amendment.

We therefore recommend that *this section be deleted*.

Section E.6 - Lake Service designation

In our February 28, 2022 letter, we asked what would be the purpose of this designation. We appreciate that an answer was provided in the Comment Response Table, and that section E.6.3.7 was added. However, these do not satisfy our fundamental concern.

If there is a legally existing residential use on any mainland lot as per section D.2.6.6 as we have proposed it be modified, it would appear that sections K.6 and K.7 would appear to allow rezonings to enable home industries and contractor's yards respectively on such lots. Any proposal beyond that should only be considered on the basis of a site-specific Official Plan amendment.

Therefore, we recommend that *section E.6 be deleted*.

Section E.7.4.2 - new tourist commercial requirements

We do not know why in this draft, this section was changed to no longer apply to the Lake Temagami neighbourhood. (A comment we provided by email February 28, 2022 was only to correct a spelling mistake.)

We recommend that the preamble be restored to read, "*In the **Lake Temagami and Rural Neighbourhoods**, the following additional requirements must be met:*"

Section E.7.7.3 - Island 1022

Part of this section appears to have been accidentally omitted, and should be restored as per Draft 1 and the present Plan.

We recommend the section read, "*Notwithstanding any other policies of this Plan, the Tourist Commercial uses on Island 1022 in Lake Temagami shall be limited to eight (8) **housekeeping cabins**.*"

Section E.13.3.4 - resource use

This policy has become mangled as the drafts have progressed. It also duplicates section E.13.2.2, which we assume better reflects what is intended.

We recommend *this section be deleted*.

Section E.14.1.1 - Crown Land - Protected Area

Although this section has been modified, it is still not correct. The lands subject to this designation are *one and the same as* the regulated provincial parks and conservation reserves in

the Municipality.

We recommend that this section read:

*The Crown Land - Protected Area land use designation **consists of the Provincial Parks and Conservation Reserves within the Municipality. These include Crown land with representative 'old growth' red and white pine sites, some watersheds containing the headwaters of rivers flowing through the wilderness park, significant wetlands, provincially significant ecological and geological features and significant recreation areas and ~~applies to~~ a portion of Temagami Island. ~~These lands also include Provincial Parks and Conservation Reserves.~~***

Section E.16 - Restricted Rural/Waterfront - Lake Temagami

We are concerned the wording is still somewhat ambiguous and therefore not entirely consistent with section D.2.6.6. We therefore recommend that this section read:

*(E.16.1.1) The Restricted Rural/Waterfront – Lake Temagami land use designation applies to **all Patented Lands that are located in the mainland areas of the Lake Temagami Neighbourhood.***

*(E.16.2) Permitted uses **are limited to** those listed under Section D.2.6 of this Plan due to the location of these lands being on the mainland of Lake Temagami and within portions of the Skyline Reserve.*

Section F.1.2 - shoreline setbacks

In our February 28, 2022 letter, we advocated strengthened, more prescriptive shoreline setback policies, and provided a detailed rationale for so doing.

In the Comment Response Table, MHBC provided the following:

Request should be made to Council to increase the setback to 30 metres for new development as this is a significant departure from the current approach. Appreciate the considering [sic] that has been proposed for existing lots and existing non-conforming situations. Will raise this point in the staff report and staff will seek direction from Council on this point.

However, this was not raised in the staff report proper, nor was it mentioned at the August 22 public meeting.

We continue to recommend that new sections be added as follows. Most logically, these would follow F.1.2.1. These would also replace F.1.2.5(h), which is largely the same as the first paragraph of the proposed new section.

A setback from the flood elevation or the normal or controlled high water mark shall be set out in the Zoning By-law, in order to:

- *Protect the upland, shoreline and nearshore habitats;*
- *Protect adjacent surface water quality from phosphorus loading;*
- *Prevent erosion, siltation and nutrient migration;*
- *Maintain shoreline character and appearance; and,*
- *Minimize the visual impact of development.*

The minimum setback shall generally be 30 m for dwellings, sleep cabins, standard and cabin secondary dwelling units, leaching beds and other treatment components of sewage systems, and all other accessory buildings and structures, except that there shall be no setback requirement for docks, boathouses, pumphouses, gazebos, and decks where otherwise permitted. No new lot shall be created unless it can accommodate development on the basis of these standards.

However, on a lot that existed on and whose boundaries have not been altered since [the date the Plan is approved], and that is not vacant, the minimum setback shall generally be 15 m, excepting 30 m for leaching beds and other treatment components of sewage systems, and nil for the aforementioned shoreline structures. On such lots, the Committee of Adjustment may permit a reduced setback that would allow an existing noncomplying building to be enlarged or replaced provided there is no reduction in the least distance from the building to the shoreline, and it may permit a reduced setback that would allow an existing leaching bed to be enlarged or replaced where due to the size, shape, or topography of the lot, there is no feasible alternative. Otherwise, it is expected that the Zoning By-law setbacks will be strictly adhered to.

The Zoning By-law will also provide for appropriate variation from these standards in the Urban Neighbourhood.

Section F.1.2.5 - natural landscape best practices

In our February 28, 2022 letter, we expressed concern with the extent to which best practices would be required, given the variation between "should" and "shall" in the policy. The Comment Response Table says, "The term shall has been incorporated into these policies". However that is not always the case.

We recommend that "should" ***be replaced by "shall"*** throughout this section.

Section F.1.2.8 - shoreline development best management practices

In our February 28, 2022 letter, we expressed concern with some of the individual best management practices and where they would apply. We did not intend to suggest that all the practices be deleted, but that is what has been done. We do recognize it is difficult to provide a comprehensive list and that there is a potential for overlap with other policies of section F.1.

We therefore recommend that this section read:

The Municipality shall also encourage, through planning approvals and other

mechanisms such as landowner education, the use of Best Management Practices for shoreline development, including but not limited to those described elsewhere in Section F.1.2.

Section G.14 - sharing economy

We confess to not having paid attention to this section until now.

The "sharing economy" is not defined in the Plan or in Provincial planning policy. To the best of our knowledge the only reference to it in any Provincial policy, was in "The Sharing Economy Framework", 2018, published previous to and not pursued by the present Government.

To our understanding, the most notable examples of the "sharing economy" would be Airbnb and similar short-term accommodation-sharing, and Uber and similar ride-sharing.

Uber etc. would not seem to be a major activity or concern in the Municipality, and to our knowledge, cannot be regulated under the *Planning Act*. That leaves short-term accommodation sharing as the only evident subject of this section.

Certainly, there is the potential for the Municipality to regulate Airbnb as well as any other form of short-term rentals, through some combination of *Planning Act* and/or *Municipal Act* tools. The Municipality knows this has been a contentious and complex issue in many lake country municipalities, and in fact is already considering this.

We believe there are three reasons not to include this section. First, anyone not entirely familiar with this piece of jargon, which is not even widely accepted planning jargon, will have no idea what the section is about. Second, the Municipality does not need the backing of this section for a *Municipal Act* bylaw, and should it decide that planning instruments are also required should it pursue such a bylaw, and that those should include an official plan amendment, it can pursue that at the time. Once the public understands what G.14 means, they may conclude that the Municipality has already decided to regulate short-term rentals without the full public consultation that would warrant. Third, if the Municipality decides not to regulate short-term rentals - and many municipalities have decided that is the better course - this section will be pointless.

Therefore, we recommend ***this section be deleted.***

Section H.5 - lake trout lakes

In our February 28, 2022 letter, we recommended that the Plan identify the Municipality's lake trout lakes. The Comment Response Table says, "No issue including Lake Trout Lakes – Net, Cassels, Temagami". However, this has not been done. Nor is it clear that the three lakes named are at-capacity for lake trout, those being the most important to identify; there are many more than three lake trout lakes in the Municipality.

We therefore recommend a new section H.5.1.5 be added (assuming this is a correct statement):

The Municipality's at-capacity lake trout lakes are Cassels, Net, and Temagami.

Section J.1.1.10 - reserve capacity

It should be made clear that this new policy does not apply in the Lake Temagami Neighbourhood.

We recommend the first sentence read:

In the Urban Neighbourhood, approval of new development, including new lot creation, will require confirmation of a sufficient reserve sewage and water system capacity within municipal sewage and water services or private communal sewage and water services in accordance with applicable Ministry of Environment, Conservation and Parks guidelines.

Section J.4.1.1 - access point principles

One of the key adverse effects of failure to adequately control access, is greater transmission of invasive plants and animals.

We recommend that subsection (b) read, "***Mitigate the potential impact of development and invasive species transmission on key natural resources.***"

Section J.4.3.1 - approved access points

Two access points have been removed from Section J.4.3.3 as we recommended in our February 28, 2022 letter. However, J.4.3.1 needs to be modified as well.

We recommend that the first sentence read:

Fourteen lake access points currently approved by the Ministry of Natural Resources and maintained by either the Ministry or the Municipality of Temagami are identified on Schedule C to this Plan.

Section K.4.4 - secondary dwelling units in rural areas

As this section has now been modified to pertain to urban areas also, the title for this section is inappropriate and should logically read, "Secondary Dwelling Units". However, section K.4.3 has the same title. We recommend one of two alternatives:

- ***retitle K.4.3 "Secondary Dwelling Unit Definitions" and K.4.4 "Secondary Dwelling Units", or***
- ***merge section K.4.4 with K.4.3.***

Sections K.4.4 and K.4.5 - shoreline lots

There are several references in these sections to "shoreline lots", "non-shoreline lots", and "non-shoreline residential lots". Section K.5.1.2 refers to "shoreline property". Other policies in section K.4.5 and elsewhere in the Plan refer to "waterfront lots".

We recommend that all descriptions of lots **be standardized to either "shoreline" or "waterfront"**, as MHBC considers most appropriate.

Section K.4.4.3 - secondary dwelling units

This section as modified appears correctly intended to pertain only to non-shoreline lots, but the preamble could be clearer and the provisions retain one element appropriate to shoreline lots only.

We recommend the section read:

On non-shoreline lots, standard secondary dwelling units, cabin secondary dwelling units and sleep cabins ~~on non-shoreline lots~~ shall only be permitted provided:

- (a) All requirements of the Zoning By-law, including the provisions to govern compatibility with the principal dwelling and surrounding land uses, as well as the size of the standard secondary dwelling unit or cabin secondary dwelling unit and other standards including the Ontario Building Code and other relevant municipal and provincial regulations can be satisfied;*
- (b) It has been determined that on-site servicing, including a septic system and private wells, have sufficient capacity for the secondary dwelling unit;*
- (c) A standard secondary dwelling unit or cabin secondary dwelling unit shall not be permitted in the front yard ~~or in the minimum distance from the shore as defined by the Zoning By-law; and,~~*
- (d) The standard secondary dwelling unit or cabin secondary dwelling unit shall comply to all other policies of this Plan.*

Section K.4.5.2 - sleep cabins and secondary dwelling units

We appreciate the inclusion of the definitions in section K.4.3. However, these were intended to replace what is now section K.4.5.2, not supplement it. Section K.4.5.2 is not entirely consistent and potentially conflicts with the section K.4.3 definitions.

We recommend that ***section K.4.5.2 be deleted.***

Section K.4.5.9 - pre-existing boathouses

This section has been modified as we recommended in our February 28, 2022 letter, but some of the former wording remains.

We recommend it read,

For the purpose of this section, a boathouse with sleeping accommodations that lawfully existed as of April 18, 2013 ~~came into effect~~ is deemed to be a sleep cabin.

Section L.8.3 - Crown land consent policies

Subsection L.8.3.1 (h) references section G.8.1 but there is no such section of the Plan.

In our April 18, 2022 letter, we advocated restoration to the Plan of reference to the Lot Creation and Development Study as per the OMB's 2004 decision on the original Official Plan and as expressed in sections 5.1 and 5.3.6 of the present Plan, while pointing out inappropriate references to such studies in other contexts. Instead, Draft 2 removed all references to any lot creation and development study.

While as noted in our 2022 letter it would not be appropriate to undertake such a study at this time, adding these policies would ensure the Municipality is better prepared if at any time the Province were to change policies such as to allow Crown island lot disposition on Lake Temagami.

We continue to recommend that new sections be added, logically as L.8.3.2 and L.8.3.3.

The Municipality recognizes that it is the policy of the Province not to dispose of any Crown lands on lakes with naturally reproducing lake trout populations, including Lake Temagami. Should the Province at any time decide to change this policy such that Crown island disposition would be permitted on Lake Temagami in some circumstances, prior to that change taking effect the Municipality, in consultation with the Ministry of Natural Resources, will undertake a Crown Island Lot Creation and Development Study for Lake Temagami, and incorporate the applicable results into the Official Plan. Any technical amendment to this Plan in accordance with Section E.13.1.4 shall only take place concurrent with or following completion of this process.

The Crown Island Lot Creation and Development Study will establish the conditions and locational criteria for new lot creation, based on the following while remaining subject to Section D.2.3.4:

- ***a sound technical foundation relying on specific and measurable ecological standards and values,***
- ***locally recognized principles of environmental, economic, and social sustainability, and***
- ***consistency with existing development character.***

Appendix 1

We appreciate the completion of this Appendix and the inclusion of the Tenets for Temagami in section 1.

The introductory material to section 1, and all of sections 2, 3, and 4, are copied or adapted from sections A.1.6, A1.8, A1.7, and A1.9 respectively of the present Plan, which sections have not been carried over into the proposed Plan proper. We are not taking issue with that decision, but we are concerned that whereas the Tenets are appropriately referenced in the Plan proper, there is no reference to these other sections in the Plan proper and it is not clear what their function is.

As well, with the removal of the Cross Lake access point (section J.4.3), the references to that access in the introductory material to section 1 are now inappropriate.

* * *

I hope these comments will assist staff, consultants, and Council in their consideration of the final Plan to go before Council. We would be pleased to discuss these points further with your consultants at any time.

Yours sincerely,

[original signed by]

Anthony Usher, RPP

cc. Jamie Robinson
Patrick Townes