



Agricultural Land Commission

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Comox Valley Regional District

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December 10th, 2009

Reply to the attention of Roger Cheetham
ALC File: 39022

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DEC 14 2009
To: Roycroft
cc: Urban, Garbutt

Carol Morfitt
Manager of Administration
Comox Valley Regional District
600 Comox Road
Courtenay, BC
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Dear Madam:

Re: Comox Valley Regional Growth Strategy

Further to your e-mail correspondence dated 1st December 2009 we are pleased to provide the following preliminary comments on the strategy based on the information provided in your correspondence. It is anticipated that the Island Panel of the Commission will be able to review the strategy during the third week of December 2009 and any further comments will be provided thereafter.

General Comment. We note that the information provided is lacking in detail with regard to the goals, objectives and policies that we presume it is intended will be included in the growth strategy. This lack of detail has made it difficult for the Commission to provide any meaningful comments relating to its interests at this stage.

The Commission's experience is that the success of a strategy not only depends upon the goals, objectives and policies that it contains but also, the mechanisms provided to ensure that the necessary actions are taken to implement them. With respect to the Commission's interests a tried and tested way of achieving the overarching goals of the plan - to protect and support agriculture, is to develop an agricultural strategy with specific actions recommended to ensure that implementation occurs. As the Comox Strathcona Regional District has already undertaken this initiative in the case of this growth strategy, we suggest that it would be appropriate to provide for an update of the agricultural strategy.

As pointed out in our previous letter to the consultants dated 24th August 2009, water is of paramount importance to agriculture. We are aware that the regional district is developing a regional water strategy and we anticipate that it recognizes and addresses the needs of agriculture. Otherwise it might be an issue for which a specific study is required to ensure that the need is recognized and that the plan makes provision for the necessary actions to address this need.

The comprehensive background paper indicated that there is significant capacity in the core settlement areas to accommodate the residential development anticipated in the region. Thus from an agricultural perspective it appears that there will not be as much pressure on the ALR to

accommodate further urban growth as is the case in some of the other regions. Nevertheless we suggest that implementation measures include specific density targets with provision for amending land use bylaws if necessary to ensure that the targets are achieved, failing which the envisaged densities may not occur.

Ecosystems, Natural Areas and Parks.

Given that:

- The majority of the priority conservation areas in the Comox Valley are designated for agriculture and are privately owned;
- Ecologically, of the regions in Canada, the Comox Valley is one of the most threatened by development;
- Approximately 50% of the land within the ALR has yet to be cleared and developed for agriculture;

it is extremely important that the growth strategy recognize the potential for conflict between agriculture and environmental protection and a strategy is developed for resolving such conflicts. We note that the policy directions include the reintroduction of native plant species, the promotion of conservation practices in agricultural areas, OCPs with more conservation policies, the development of trail systems and various other measures, all of which have the potential to cause impacts on agriculture. In our experience this is one of the most difficult issues faced by the agricultural community and the growth strategy therefore needs to recognize this potential for conflict and provide a mechanism for resolving these conflicts. Solutions must involve affected land owners and must for land within the ALR recognize the rights of land owners to use their land for agricultural purposes.

The Regional Vision. We have no difficulty with the vision statement. We suggest that there might be merit in adding a statement that specifically indicates support for the local farm economy, even if it can be inferred from the regional goals that follow.

Made –in-the-Valley Approach to Growth Management. We fully appreciate this approach. As significant impacts can be created by integrating urban development with agriculture we suggest that the word “interlace” be replaced with another word or it be made clearer in this section that rural and urban development will be separated and buffered from agriculture.

Rural Areas. We suggest that the word ‘minimum’ be removed from the statement: “The agricultural areas policies adhere to *minimum* policies and regulations.....”

Regional Services. We refer you to our letter to the Consultants dated 24th August 2009 and to our above comments with regard to the importance of water for agriculture. In the light of these comments we think it is important to mention the needs of agriculture in addition to development in this section.

Food Systems. From the Commission’s perspective a fundamental requirement of the growth strategy is to preserve and protect agricultural land and support agriculture. Some of the key issues in achieving these two major objectives are:

Within the ALR

To ensure the provision of an adequate supply of water (the single most important requirement) particularly having regard to the likelihood of an increase in the use of irrigation water.

To provide a mechanism that aids the resolution of the environmental/agricultural conflicts.

To ensure that the expansion of farming activities onto land not already used for agriculture is not hindered by climate change or initiatives or measures to protect environmentally sensitive areas.

To ensure that no unnecessary restrictions are placed on agricultural uses by permitting all farm uses permitted in terms of the Commission's legislation and by not imposing controls that exceed normal farm practices.

To restrict non-compatible uses, including the proliferation of rural residential development.

At the Rural/urban interface

To ensure that appropriate buffering measures are taken to protect both uses. (See <http://www.alc.gov.bc.ca/resmgmt/sf/Publications.htm#edge>)

Outside the ALR

To ensure that residential and other urban development occurs in an efficient manner thus reducing the need for urban expansion onto land within the ALR.

To ensure that urban development does not result in negative impacts on adjoining land within the ALR by affecting the volume and quality of ground and surface water, in particular storm water discharge.

You may also like to refer to the Commission's ALR and Community Guidelines (http://www.alc.gov.bc.ca/publications/Community_Planning_Guidelinescolour.pdf) for more information.

This being said we recognize that it is not the function of the growth strategy to provide detail, this being addressed in the next steps in the process, through further studies, bylaw changes and other actions. We thus suggest that the growth strategy focus on the fundamental issues of importance to agriculture – water supply, resolving environmental/agriculture conflicts and ensuring that there are no restrictions on agriculture (including the clearing of land). The details can be worked out in subsequent studies including an update of the agricultural strategy as mentioned above.

We thank you for the opportunity to provide comments on the issues of importance to agriculture and look forward to reviewing the growth strategy in due course.

Yours truly,

PROVINCIAL AGRICULTURAL LAND COMMISSION



Roger Cheetham, Regional Planner

cc Jill Hatfield, Regional Agrologist, Ministry of Agriculture and Lands, Courtenay
Laura Tate Growth Strategy Manager, Community and Rural Development
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