

# Final Interim Report

COMOX VALLEY REGIONAL DISTRICT AGRICULTURAL PLAN UPDATE



**September 2023**

PREPARED FOR



PREPARED BY



IN ASSOCIATION WITH



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## Acronyms

ALR	Agricultural Land Reserve
CVAP	Comox Valley Agricultural Plan
CVEDS	Comox Valley Economic Development Society
CVRD	Comox Valley Regional District
TRAWP	Tsolum River Agricultural Watershed Plan

## 1.0 Introduction

It has been over 20 years since the development of the Comox Valley Agricultural Plan (CVAP), approved in 2002, which was one of the first Agricultural Plans in the province. Due to the evolving nature of the agriculture and agri-food sector and the regulations surrounding land-use planning, the Comox Valley Regional District (CVRD) has embarked on a project to update and modernize the CVAP. The process to update the CVAP includes background research and analysis, a high-level overview of relevant policies, and engagement with the agriculture and agri-food sector and the public, which will culminate in an updated CVAP.

The purpose of the updated CVAP is to create a comprehensive agricultural planning document that helps to guide the CVRD's administration of agricultural issues into the future. The CVAP will focus on the CVRD's jurisdiction and identify opportunities to strengthen the regional agriculture and agri-food sector and contribute to its long-term sustainability. It is anticipated that the updated CVAP will propose recommended actions that address future changes and challenges specific to the CVRD to support regional planning efforts.

This *Final Interim Report* draws from all of the research, engagement, and analysis work completed to date to present three central theme areas for consideration during next steps of updating the CVAP.

## 2.0 Key Inputs for Identifying CVAP Themes

Background work to commence the CVAP update began in 2021 and a consultant was hired in April 2022. As part of the agriculture planning process, a review of the CVAP 2002 was completed to provide a comprehensive understanding of past priorities and objectives, as well as the actions, regulatory changes and policies that were initiated and/or implemented. Documents reviewed included the CVAP 2002 priority areas, local Official Community Plans, zoning bylaws, and other local plans and policies which are relevant to the agriculture sector. In addition to the desktop review, input was provided by the CVRD department staff through four CVAP 2002 evaluation workshops that were facilitated by the consulting team. These key project steps culminated in the following reports:

- *Background Report: 2023 Comox Valley Agricultural Plan*
- *Evaluation of the 2002 Comox Valley Agricultural Plan*
- *Engagement Summary Report*

These reports provide the foundation and rationale for the key themes and recommendations towards next steps for completing the CVAP update. These key themes and recommendations are found within this document, the *Final Interim Report*.



### 3.0 Background Report - Summary

An accompanying *Background Report* was developed to provide information on current trends in the agricultural sector since the 2002 CVAP was completed and provide an analysis of policies and regulations relating to the agriculture sector in the CVRD. Data sources included Statistics Canada's Census of Agriculture, the BC Ministry of Agriculture and Food's Agricultural Land Use Inventory and Agricultural Water Demand Model for the Comox Valley.

The background report includes the following elements:

- Summary of food-related uses of land by Indigenous peoples in the Comox Valley by Heritage Consultant Dr. Morin;
- History of settler agriculture in the Comox Valley;
- Regional geographical and population context;
- Biophysical summary including agricultural capability;
- Current statistical agriculture profile of the region;
- Overview of available agriculture resources and supports; and
- Contextual review of agriculture policies and regulations.

This *Background Report* provides the foundational knowledge about the agricultural sector and biophysical characteristics of the Comox Valley to help inform the development of an updated CVAP. The following sections provide a short overview of the more detailed information found in the report.

#### 3.1. Indigenous Food Systems<sup>1</sup>

The Pentlatch ancestors of the K'ómoks First Nation who occupied the area now known as the Comox Valley practiced an array of ecosystem management techniques to increase the abundance of preferred plant and animal species in the local area. Early historical records indicate that the Comox Valley was closely managed and tended by local Pentlatch people for millennia, and the land was undoubtedly owned by specific Pentlatch lineages. The Tsolum River prairie, the open parkland environment encountered by colonists in the mid-19<sup>th</sup> century in the Comox Valley were anthropogenic environments that were regularly and carefully managed by local Pentlatch people. These prairies were the northern extent of the Garry Oak ecosystem and hosted a range of plant species that were important to traditional Pentlatch diets. These species included camas (*Camassia quamash*), bracken fern (*Pteridium aquilinum*), blueberry (*Vaccinium sp.*), and saskatoon berry (sp). The primary way Pentlatch people maintained these Garry Oak ecosystems and associated prairies was through the use of controlled burns. By burning these prairies, Pentlatch people maintained their extent and increased the productivity of desired plant species and deer.



<sup>1</sup> Content provided by Dr. Jesse Morin



### 3.2 Settler Agricultural History

The Comox Valley was settled in the 1860s after it was identified as holding great potential for agricultural production due to fertile soils and a favourable climate. The first Comox Valley pioneers came to farm the land, which they acquired through pre-emption, a process of acquiring land for free from the government under the condition of breaking or clearing the land and farming it. Parcels of land settled through pre-emption were usually around 160 acres. Much of the land within the Comox Valley was pre-empted by 1899. Early farmers in the Comox Valley produced a diversity of foods including grain, silage corn, milk and other dairy products, beef, sheep, hogs, poultry (meat and eggs), peas, potatoes, tree fruits (apples, pears, plums and prunes).<sup>2</sup> Dairy was the main agricultural sector in the area and culminated into a farmers cooperative creamery called the Comox Creamery which operated for 67 years before dwindling in membership and eventually joining the Fraser Valley Dairy Cooperative (Dairyland) in 1968.

### 3.3 Biophysical Context and Agricultural Capability

There are approximately eight frost-free months per year in the Comox Valley, and moderate temperatures year-round. Agricultural capability ratings indicate high potential for agricultural production, due to good soils and relatively flat topography. Approximately 14% of the CVRD's total land area is within the Agricultural Land Reserve (ALR).<sup>3</sup> The 2013 Agricultural Land Use Inventory found that of the 23,400 ha of ALR in the CVRD, 23% was being actively farmed and 38% was otherwise unusable for farming due to infrastructure (roads, houses, barns etc.), pre-existing residential infrastructure, waterbodies, wetlands, or parks. The Census of Agriculture data from 2021 indicates that out of 9,148 ha of farmed land in the Comox Valley, only 975 ha (10%) is being irrigated. However, as summers grow longer and hotter with a changing climate, the need for irrigation is increasing. This creates additional pressure to watersheds which experience significant differences between wet and dry seasons, often bringing floods and high water in the winter and springs, followed by very low water levels in July through October when it is needed the most for agricultural production.

### 3.4 Agricultural Profile and Economics

An agricultural profile of the Comox Valley was developed using 2021 Census of Agriculture data. Below are some of the highlights.

- There are 351 farms in the CVRD, where *farm* is defined as an operation reporting farm revenues and/or expenses to the Canada Revenue Agency.
- The most common types of farming activities reported on farms in the CVRD are fruit and tree nut production, cattle ranching, and hay production.
- Poultry and eggs and vegetable production have increased steadily over the last 10 years. There are also a number of horse farms in the Comox Valley.
- Over a third of farms (37%) are less than 10 acres in size (Figure 1).
- Over 80% of land being farmed is owned by the farm operator.
- The average age of farmers is 59.

<sup>2</sup> Comox Valley Agriculture Plan. [Background Report](#). 2000

<sup>3</sup> BC Ministry of Agriculture. Comox Valley Regional District Agricultural Land Use Inventory. 2014.

- Total farm capital (land and buildings, livestock and poultry, farm machinery, and farm equipment) across the Comox Valley has increased in value from \$531 million in 2016 to \$691 million in 2021. This is primarily due to the rising value of land.
- Average gross margins are 4%, meaning that for every \$1.00 spent by the farmer, \$1.04 was earned by the farmer.
- The majority of farms reported gross farm receipts less than \$100,000, with a third reporting less than \$10,000 (Figure 2).

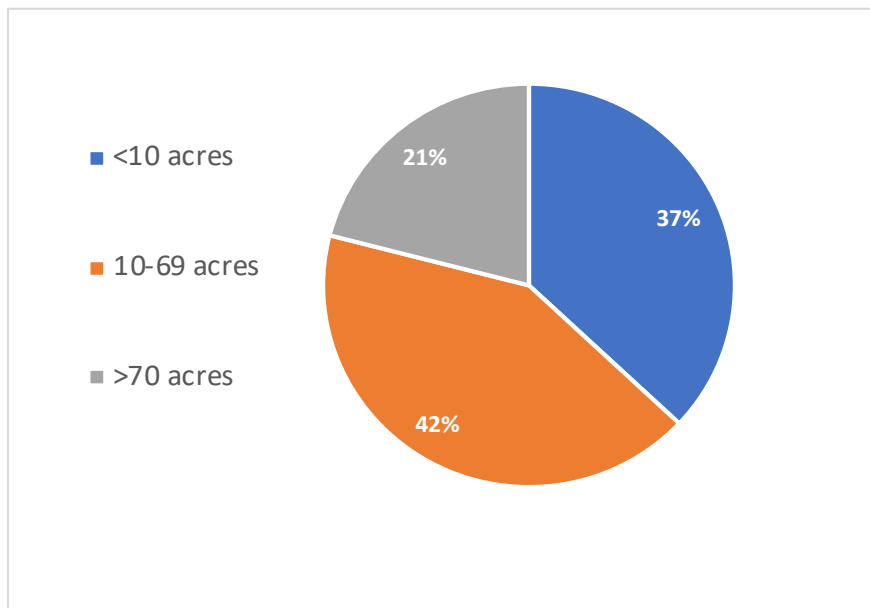


Figure 1 Size of farms in the Comox Valley.

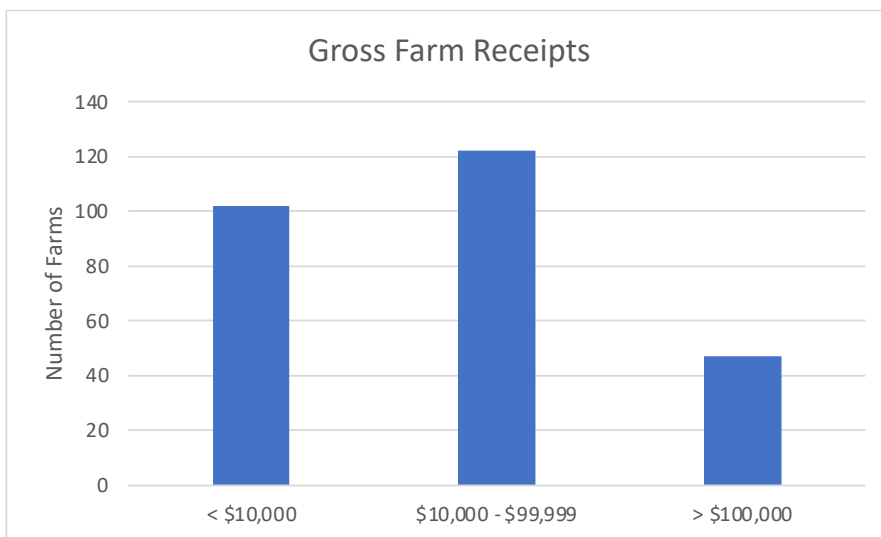


Figure 2 Comox Valley gross farm receipts in 2021.



## 3.5 Food System Supply Chain Opportunities and Challenges

### 3.5.1 Transportation and Distribution

Like most agricultural sectors on Vancouver Island, access to transportation, water and waste management, and distribution infrastructure are required to reach the larger domestic and export markets through the Lower Mainland. The CVRD is located within the north-central area of Vancouver Island and is well-served by several transportation nodes including major roads and highways, ferries and airports. Support systems and infrastructure for distributing food to major retail markets have long been established and operate efficiently at the provincial and national levels (Sysco, Gordon Food Services, and Overwaitea are examples). However, many producers in the Comox Valley may have difficulty accessing this distribution system for local markets because their operations and yields are too small to meet production requirements of larger scale retail outlets. Furthermore, the supply chain is vulnerable to disturbances such as natural disasters and extreme weather events that disrupt access to the main roads, highways, and ferry routes. Approximately 55% of Comox farm businesses sell their products directly to consumers through farmer's markets, subscription product boxes, and/or at the farm gate.



### 3.5.2 Processing and Value-Added

Local availability of food processing services and resources are a critical part of a diversified and resilient food system, offering opportunities for producers and processors to create value-added products, reduce transportation of raw products/livestock to more distanced processing facilities, and build their businesses in new directions. The 2021 Census of Agriculture reported 33 farms selling value-added products. There are three abattoirs in the Comox Valley that process chicken and turkey and one abattoir that processes red meat (including hogs, cattle, sheep and other livestock). There are dairy processing facilities for cheeses and yogurts. Other processing businesses include wineries, distilleries, craft breweries, bakeries, and products such as condiments/sauces, chocolates and seafoods. There are a few commercial/commissary kitchens available for rent in the Comox Valley and a Food Hub Feasibility study was completed for the CVRD in 2021/2022. A business model has been developed for the establishment of a local food hub and the CVRD is moving forward with the implementation plan.<sup>4</sup>



<sup>4</sup> Comox Valley. [Food Hub Project](#). Accessed July 2022.

### 3.6 Government Policies and Regulations

Agriculture is governed by a network of Federal, Provincial, and local governments, each playing a specific role in regulating the use of agricultural land, the making and distribution of food products, and ensuring the health and safety of the food system. Other entities and departments within levels of government focus on the economics of agriculture and on the interface between environmental protection, climate change and agriculture. At the provincial level, important policies and regulations include the *Agricultural Land Commission Act*, *Farm Practices Protection (Right to Farm) Act*, *Water Sustainability Act*, *Environmental Management Act*, and *Assessment Act*.

Regional districts play a role in region-wide planning by developing a Regional Growth Strategy (RGS) and other policies that link or coordinate the otherwise independent planning and land use regulation choices of member municipalities. The CVRD RGS was adopted in 2011. There are eight goal areas in the RGS, and the agriculture and food sector intersect with several of them, such as “Food Systems”, “Ecosystems, Natural Areas and Parks”, and “Local Economy”. The RGS identifies the land uses for agriculture within the Rural Settlement Areas and Agricultural Areas, which have been established using the ALR boundaries. Land use policies and regulations in the CVRD’s three electoral areas are contained within the Rural Comox Valley OCP and the Rural Comox Valley Zoning Bylaw which contain relevant policies and regulations.



### 3.7 Community Food Security

From the late 1800’s to mid 1900’s agricultural development increased and Vancouver Island farms provided most of the food required by residents.<sup>5</sup> In the last 50 years there has been a decrease in the proportion of food that is produced on the island – unverified figures suggest what was once a resiliency rate of 85% is now closer to 5-10%.<sup>6</sup> A strong agricultural sector, where producers of all commodity types and sizes are supported, will contribute positively to community food security.<sup>7</sup> Whether farm products produced in the Comox Valley are sold locally or not, having active farms in the region attracts and retains the supporting systems such as equipment dealers,



<sup>5</sup> Strategies for Increasing Food Security on Vancouver Island. Vancouver Island Community Research Alliance, Office of Community Based Research. 2011.

<sup>6</sup> A Baseline Assessment of Food Security in British Columbia’s Capital Region. Emily MacNair. 2004.

<sup>7</sup> Community food security arises when all community residents obtain a safe, culturally acceptable, nutritionally adequate diet through a sustainable food system that maximizes community self-reliance and social justice.

mechanics, food distribution companies and other supporting businesses for the agriculture sector. Increasing the agricultural productive capacity of Vancouver Island, through methods which are sustainable as well as economically and socially beneficial to local communities, will support food security in the Comox Valley.

## 4.0 Key Takeaways from the 2002 CVAP

While examining the previous 2002 CVAP, the following questions were used to guide discussions with the Project Advisory Committee, CVRD staff, and key stakeholders throughout engagement efforts:

- **Vision:** Does the previous vision still hold true, or does this need an update?
- **Implementation:** What has been completed? What is in progress? What is not completed or started and why?
- **Action vs Advocacy:** What is the right combination of direct action, partnerships initiatives, and education/advocacy desired for the plan?
- **Leadership:** How important is it for the recommendations in the plan to be led by local government while acknowledging issues outside of jurisdiction?

The previous 2002 CVAP included 100 recommended actions. Of those, 33 (1/3) have been completed or are in progress while 67 (2/3) have not been completed. Often, the main reason for the action not being completed was because the tasks associated with the recommendation were not within the scope or jurisdiction of the local government.

There were several other key take-aways from the review of the 2002 CVAP. These findings will help to inform the preparation of the updated CVAP and are summarized in the list below.

- **The vision should be updated:** The vision for the plan is still relevant but needs to be refreshed to include terms that were not clearly identified in 2002, such as climate change and reconciliation.
- **Actions should focus on the jurisdiction of local government and partnerships:** The updated CVAP should focus on what the CVRD has jurisdiction over and can change and influence. In areas that are important to agriculture, but outside the direct purview of the CVRD, partnership, support and/or advocacy roles may be identified.
- **Water continues to be a critical issue:** The Tsolum River Agricultural Watershed Plan (2021) contains recommendations for agriculture and provides a foundation for developing water-related goals, objectives, and actions for the updated CVAP.
- **The CVAP land use recommendations need modernizing:** Since 2002, there have been several changes to Provincial and Federal legislation and regulation that applies to agriculture. The updated CVAP should incorporate these new changes and recommend how OCPs and Zoning Bylaws could be updated and modernized for agriculture.
- **Continue to apply elements that are working.** There are several elements of the 2002 CVAP that are still relevant and should propel through to the updated CVAP. These elements include but are not limited to: Improving access to information, conflict management, agricultural governance, economic development, and regional infrastructure for agriculture (e.g., permanent farmers market, food hub).



## 5.0 Engagement Process and What We Heard - Summary

Led by the consultants and guided by the CVRD, engagement activities took place over approximately 10 months (Fall 2022 to Spring 2023). There were two distinct rounds of engagement:

- 1) The first round developed an understanding of the challenges, and opportunities facing the sector, primarily through interviews and Project Advisory Committee Meetings, and
- 2) The second-round dove deeper on the key areas of concern identified in round one, through community workshops, focus group meetings, a webinar and written submissions.

The process held space for the involvement of the K'ómoks First Nation and communications were led by CVRD leadership. A consultant for K'ómoks First Nation provided content regarding pre-colonial food systems within the community, which was included in the Background Report. CVRD staff provided an overview of the project with Chief and Council in May 2002, and it was recommended that Dr. Jesse Morin be retained to inform the project with a historical food-related context.

A detailed overview of all the engagement undertaken in perspectives heard is available in the *Engagement Summary Report* (see Appendix) and highlights are provided in the sections below.

### 5.1 Engagement Process

#### Interviews

The consultant team conducted interviews with 29 individuals in the Fall of 2022. The majority of interviewees were farmers and ranchers. Other interviewees included representatives from local agri-food sector organizations and local and provincial governments. Interview questions focussed on the experiences of the interviewees with regards to agriculture, what key challenges or barriers exist, and what solutions or opportunities they envision for moving the sector forward. The interviews contributed to the background context of agriculture in the Comox Valley including the challenges, opportunities, and benefits of farming in the region. Furthermore, the interview process helped to inform the establishment of the Advisory Committee.

#### Project Advisory Committee

An Advisory Committee was formed to assist in providing critical feedback at important steps along the project timeline. Advisory Committee positions were advertised through print media, online (social media), and via email. Interested members of the public were encouraged to complete an application and submit it to the CVRD for consideration and 13 members were selected. The members were mainly agricultural producers and farm operators and were selected based on their agriculture and agri-food expertise. A Terms of Reference was developed to help guide meetings. Meetings occurred in November 2022, December 2023, February 2023 and another is planned for late summer 2023.



### Focus Group Meetings with Local Organizations

Three online, facilitated focus group meetings were held with the leadership teams of key local agricultural organizations in April 2023:

- Comox Valley Farmers' Institute (5 attendees)
- Mid-Island Farmers' Institute (4 attendees)
- Comox Valley Farmers' Market Association (9 attendees)

The meetings consisted of a review of strategic areas of influence that the CVRD can have in agricultural planning, presentation on the CVAP Draft Interim Report, and roundtable discussions regarding priority areas for each organization, including identifying challenges, opportunities, areas for further consideration, as well as validating perspectives already gleaned through engagement and review.

### Themed Community Workshops

Four community workshops were held during May 2023 at Merville Hall. Each workshop consisted of a theme relating to the agriculture sector. The themed workshops brought farmers, processors and other agriculture sector players together who may not usually have the opportunity to meet with one another. These themed workshops were based on key issues that arose during the initial rounds of engagement, including:

- Land Use Planning
- Emergency Planning and Preparedness
- Water and Agriculture
- Business Viability

In advance of the workshops, the project team met with CVRD staff to better understand what initiatives related to each theme are already underway in the CVRD, and possible topics to discuss during the workshops. The questions discussed during the Themed Workshops we posted online for anyone to complete who couldn't attend the workshop sessions. In addition, recordings of workshop presentations were posted online for those wishing to learn more about each topic. In total, 35 people attended the sessions.



### Webinar

On June 8, 2023, an online webinar was held to provide another avenue of engagement for any members of the agri-food sector, local organizations involved in agriculture and food security and the general public. The objective of this webinar was to present the feedback received during the Themed Workshops and identify any other issues not captured by the workshops that are important for the local agriculture and food sector. Eight (8) people attended this webinar.

### Written Submissions

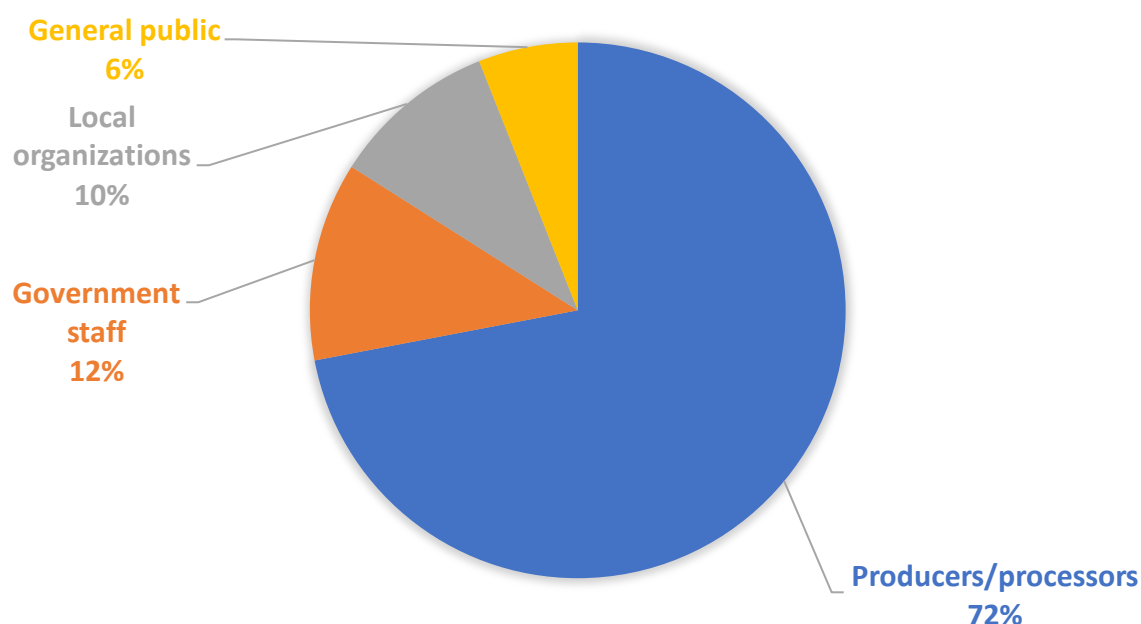
Throughout the project's process, there was ongoing opportunity for anyone to submit written comments to the consultants or CVRD staff about the challenges and opportunities for CVRD to support the local agriculture sector. A total of seven (7) written submissions were received.

## 5.2 Overview of Stakeholders

The following Table 1 and Figure 3 provide a breakdown of stakeholders who were engaged in the project's process from April 2022 to July 2023. Notably, almost 75% of the 113 people that participated are from the agriculture and agri-food sector. It is important to note that some people who attended multiple events but were counted as separate individuals.

*Table 1. Type, amount and proportion of stakeholders engaged during the CVAP process.*

Category	#	%
Producers/processors	77	72
Government staff	13	12
Local organizations	14	10
General public	9	6
<b>Total</b>	<b>113</b>	<b>100</b>



*Figure 3. Breakdown of participants at agricultural plan engagement events.*



## 5.3 Engagement Results – Summary of Key Issues

The key engagement results that were used to inform the development of the central themes and topics found in Section 6 of this report are summarized below.

### 5.3.1 Passionate Agricultural Community

The Comox Valley has a strong agricultural community, holding generations of invaluable knowledge. Stakeholders noted that one of Comox Valley's greatest strengths is a long and rich history of agricultural production, with generations of knowledge and experience in farming, foraging and harvesting in the region's climate and landscapes. Within Comox Valley there are two Farmers Institutes. While these organizations strive towards similar goals and outcomes, they sometimes present divergent perspectives on topics of mutual interest. However, holding space for diversity while encouraging collaborative efforts provides better outcomes on issues that impact the wider agricultural community. The community also pointed to a disconnect between local governments' understanding of agriculture and the realities on the ground. There is hope that the role of the CVRD Agricultural Coordinator will continue to be supported and will help to minimize this disconnect over time. Engaging producers and leaning more into the expertise of the AAC could improve the capacity for the region to support agriculture.

### 5.3.2 Water is a Key Concern

The Comox Valley is experiencing the impacts of climate change through changing hydrological systems. Water management is one of the key issues in Comox Valley, producers note the changing hydrological systems are compromising water availability in the summer and creating drainage issues in the winter, which are threatening the viability of the farming sector. Producers stated that there is a need for further support on developing water storage, in the way of accessible information about where funding can be found, and regulatory advocacy. Many producers also noted a sense that the government and the general public perceives members of the agriculture sector as being water wasters, rather than water stewards. Producers noted that there is a need to balance the needs of urban and rural water users, as well as provide information and messaging around agricultural water use during times of drought.



### 5.3.3 Market Diversity Leads to Sector Strength

Producers based in the Comox Valley sell their products to a wide diversity of markets, from the farm-gate to international customers. The route to market is dictated by many economic drivers and indicators including commodity type, processing availability, storage capacity, transportation and distribution options, and customer base. This market diversity builds resiliency into the sector such that if one market fails or is in flux, the entire sector is not made vulnerable. A strong sector leads to improved agricultural supports

and services, as well as access to agri-food resources such as seed supply, feed mills, and processing facilities. However, it was also noted from interviewees that the amount of food being produced in the valley has been on a decline over the past 100 years. Interview findings pointed to rising costs of land, transportation, and inputs such as equipment, seeds, fertilizers, packaging, and feed as one of the core struggles at making farming profitable. Many producers noted that slaughter and butcher capacity of the Valley was insufficient, with the only red meat abattoir maintaining a wait list of up to 1-year. Many producers choose to send animals off island for slaughter and therefore those end products are not necessarily available to local residents.

#### 5.3.4 Farmland Protection is Critical

The Comox Valley is a highly desirable place to live, and thus experiences the pressure of urbanization of agricultural land. Many producers pointed to concerns regarding potential shifting of urban boundaries and subdivision of ALR land (or small minimum lot sizes) which often leads to the creation of rural estates rather than small farms. It was also noted that increasing prices of farmland is reducing affordability for farmers to expand their operations or for new entrants to begin financially viable operations. Additionally, many interviewees cited a lack of enforcement on ALR infringements as a contributor to loss of farmland and suggested the CVRD could play a role in enforcement of these infringements.



#### 5.3.5 Succession Planning and New Entrants are Needed to Ensure Business Sustainability

While the Comox Valley has a rich history of agriculture, food production and food harvesting, new entrants into the industry often find it difficult or impossible to build a profitable farm, with many new farmers in the region leaving agriculture within the first five years, leading to a somewhat transient local agricultural community.

New farmers are often relying on grant programs and bank loans, which are unsustainable and frequently result in the need to close the farm.

At the same time, a wave of farmer retirements is hitting the region, presenting an opportunity to weave succession planning into the opportunity to welcome new farmers.



## 6.0 Central Themes for the CVAP Update

Based on the engagement process and information derived through background research, three central themes for updating the CVAP have emerged. These are further described below.



### Central Theme 1:

Create a new vision and structure for the CVAP



### Central Theme 2:

Address six specific agriculture topic areas



### Central Theme 3:

Develop a strong implementation plan and report card to monitor progress.

### 6.1 Central theme 1: Create a new vision and structure for the CVAP.

The 2002 CVAP contained many actions for supporting agriculture. Some of these recommendations were aimed at higher levels of government and organizations outside of local government. This creates a challenge for the CVRD in implementing the plan in areas where local government does not have jurisdiction, outside of an advocacy and education role. However, there were some recommendations in the 2002 plan that remain relevant and useful for inclusion into the updated CVAP. Enduring topics that remain relevant include: protecting agricultural land; communication and information access; conflict management; economic development and business support; development of regional infrastructure for agriculture (e.g., permanent farmers market, food hub).

Inevitably, the planning context for the CVAP has changed over the past 20 years and the updated CVAP should address emerging issues such as farmer succession planning, water management for agriculture, climate change adaptation, and decolonization/reconciliation. A framework for assessing CVAP's impact and monitoring progress should also be included in the updated CVAP.

### 6.2 Central theme 2: Use topics raised during engagement to form the updated CVAP's recommendations.

Research and engagement outcomes provide rationale for six main topic areas that can be used to form actions for the updated CVAP. It is recommended that readers also review the *Background Report* and

*Engagement Summary Report* to learn more about what was learned regarding each topic area and the rationale for identifying these topics.

### Topic 1: Steward water resources to meet agricultural water needs

Water availability for agriculture is one of the top concerns for producers. It is a current issue that is only anticipated to become more acute with water shortages becoming more frequent, due to the impacts from climate change and competing demand from non-agricultural users. Water resources encompass both surface water and aquifers. Anecdotally, one farmer noted that due to a warm dry spring this year (2023), there was no well water in early June, a condition not normally seen until later in the summer. Other producers noted challenges associated a bogged down provincial water licensing process and onerous criteria for building and maintaining water storage facilities such as dugouts.



Since the 2002 CVAP, the CVRD has undertaken significant work in the area of water resource management planning through the Tsolum River Agricultural Watershed Plan (TRAWP). The Tsolum River is a key water source for the majority of farms in the electoral areas of the CVRD and the TRAWP contains specific recommendations for agriculture. These recommendations can be reinforced through the CVAP update, providing more specifics where possible.

Although water resource management is largely governed by regulations set by senior levels of government (i.e. from the provincial *Water Sustainability Act*), the CVRD does have some leverage at the local level. A recommendation within the TRAWP is to form a Watershed Stewardship Service, as a new service area for the CVRD. This concept is currently in exploratory stages. Given that the Tsolum River watershed is within the unceded traditional territories of the K'ómoks First Nation, collaboration will be an integral component. One of the main suggestions for agriculture within the TRAWP is to increase on-farm water storage opportunities, with dug-outs being the priority.

During the engagement phases of this process, many producers noted that urban-side water management also has critical impacts on agriculture. Producers expressed concern regarding the design and development of urban areas with regards to water consumption and drainage. The agricultural community indicated that if the entire community worked together to manage water resources then there would be more supply available for ecosystems, fire suppression, and agricultural needs. This points to the need to integrate water resource management into land use planning decisions more generally.

### Topic 2: Protect agricultural land and protect the producer

Protecting agricultural land through short- to long- term planning is a top priority for both producers and non-producers alike. It is recognized that agricultural land protection includes policies that apply to farmland as well as policies that apply to urban lands (e.g. urban containment boundaries). In this way, input from many participants indicates a desire for urban centres in the CVRD to be more aware of agriculture and the benefits that farms bring to residential areas.



Embodied within protection of farmland is the encouragement of agricultural activities to occur in rural areas. Many participants noted the need for incentivizing farming on smaller lots and generally increasing productivity of all agricultural lands. However, newer land use data from Ministry of Agriculture and Food and the ALC indicates that smaller lots do not tend to lead to greater agricultural productivity, and in fact result in higher land values and less affordable farming opportunities.

Participants noted tensions and direct conflicts that can arise from interface areas where agriculture is adjacent to rural non-agricultural or urban land uses. Complaints associated with normal farm practices (e.g. odour, noise, dust, spraying) and conflicts arising from trail users on or near farms with livestock (e.g. dog attacks on livestock), give rise to the notion of needing to protect the producer as much as protecting the land itself. It is suggested that edge planning policies, buffer design, and public education could help to create greater compatibility at the agricultural edge. This will require collaboration and partnerships across several CVRD departments, including:

- Land Use Planning (both short term and long range)
- Parks & Recreation
- Bylaws and Compliance



Since 2002, there have been many updates to senior level government regulations that impact the Agricultural Land Reserve (ALR), such as changes to the *Agricultural Land Commission Act* and associated regulations, as well as the Ministry of Environment's Agricultural Environmental Management Code of Practice. On-farm residential development limitations, farmworker housing requirements, and contained environment agriculture all have updated regulations to incorporate into the updated CVAP.

### Topic 3: Support actions to grow the regional agriculture economy

Historically, the Comox Valley Economic Development Commission Society (CVEDS) played a role in agricultural economic development. Although CVEDS is no longer operating, the organization was in the process of completing the *Innovate 2030: Economic Development Master Plan (2019)* when it ceased its functions. *Innovate 2030* remains in draft form and includes guiding principles and recommendations for agri-food systems and food security initiatives. The *Innovate 2030* process involved in-depth engagement with the Comox Valley agriculture and agri-food sector and helped to shape the priorities and directions in the draft document. Key directions that are pertinent for the update of the CVAP include:

- i. Develop and implement programs, services and supporting infrastructure that expands food processing, storage and aggregation capacity.
- ii. Work with industry and government partners to increase market access and export capacity within the food chain.

The CVAP update engagement process uncovered that the regional agriculture economy remains a key concern for producers and processors. The engagement process also uncovered support for the creation of an Agriculture Service that would be managed by the CVRD's Agriculture Coordinator and include an economic development component. However, there are many ways to conceive of what a thriving regional

agricultural economy could offer. For example, large commercial operators and smaller-scale producers may have different needs and different ideas for how to grow the regional food economy. The CVAP update can aim to include a full spectrum of agricultural economic development opportunities in the region, while also considering appropriate actions based on scale and scope of industry sectors and be grounded within the resources and capacity available at the CVRD.

The CVAP could focus on how the CVRD can best support the economic development work of other organizations and integrate agricultural economic development opportunities into upcoming CVRD initiatives, such as the Tourism Strategy. Although the regional focus on economic development has shifted, the CVRD has been central in moving the concept of a Comox Valley Food Hub forward. While a shared vision and plan for this initiative is still in development, the CVAP can build on this work.

Other economic development and farm viability issues and opportunities that arose during this project's engagement and that intersect with the role of the CVRD include:

- i. Increasing transit services to rural areas to facilitate farmworker access.
- ii. Establishing a permanent home for the farmers market.
- iii. Establishing an incubator farm program.
- iv. Supporting succession planning for farmers.
- v. Marketing opportunities in small lot agriculture to new farmers.



#### Topic 4: Work collaboratively for climate change adaptation and emergency preparedness

Being prepared for emergencies is a top priority for Comox Valley producers and overlaps with climate change adaptation and planning, which are critical for business viability and resilience. Being able to build a strong regional agriculture and agri-food sector also has implications for strengthening community food security, as the system is made to be more robust even when supply chains are impacted.

One key challenge identified through the engagement process is the number of organizations and levels of government involved in managing emergency preparedness and response. Strong emergency preparedness and response plans and protocols involve a deep level of collaboration between commercial agriculture operations, hobby farmers/homesteaders, local government departments, provincial Ministries, non-profits, and sector associations, among others. A number of strategies exist for effectively planning for an emergency at the farm level. For example, “buddy farm” agreements can be developed to coordinate livestock evacuation plans and are an example of an emergency response strategy where individual operators can take a lead. Other elements of emergency preparedness and response that can be effectively incorporated into the CVAP update include:

- Bringing the agriculture and agri-food sector into conversations, plans, studies, and policies that touch on climate change adaptation, greenhouse gas management, and emergency planning and response.



- Supporting the work of Farmers Institutes to develop an inventory of regional farm infrastructure and assets; encourage buddy farm agreements to be developed; and prioritize farm infrastructure to be saved during floods and fires;
- Facilitating work between the Comox Emergency Program and the agriculture and agri-food sector to secure and store local sources of feed, bedding, and other inputs.

### Topic 5: Advocate on behalf of producers to senior levels of government

Agriculture involves many levels of government policy and regulation. As such, many of the challenges reported by producers stem from the level of real or perceived bureaucracy and uncoordinated, overlapping requirements. Furthermore, local governments are limited in where they can effect change from a regulatory perspective. For example, water licensing and regulations impacting dugouts are the purview of the Province but the CVRD can have an influence by advocating for faster processing of water licenses and flexibility with dugouts, to help producers conform to new regulations.

Being a voice for agriculture at the Provincial and/or Federal level is a key way producers will feel more supported and know that the CVRD is working in their best interest. This will require communication from the agricultural community to the CVRD and for Elected Officials to have a good understanding of issues that the sector is facing. The CVRD can also advocate locally to member municipalities to consider the agriculture and agri-food sector as a key part of their communities.

Specific advocacy topic areas that emerged through the engagement include:

- Reducing red tape and timelines associated with water licensing, permits and authorizations.
- Increasing compliance and enforcement of non-farm activities on agricultural land.
- Ensuring agriculture is considered in city planning.
- Working with BC Ferries to negotiate preferred ferry rates for commercial agriculture.
- Incentivizing agriculture on small lots in partnership with the province.
- Working with Young Agrarians to support farm succession planning.
- Increasing farm income thresholds for farm tax status in conjunction with BC Assessment.
- Compensating farmers for ecological goods and services.

Advocacy takes political will, good relationships, and resources in order to be effective. The CVAP update can dig deeper into advocacy areas and identify strategic priorities for the CVRD to effectively engage in.

## Topic 6: Strengthen communication in, and awareness of, the local agricultural sector

Communication and awareness in agriculture has been identified by stakeholders in four main areas:

- To help educate non-farmers about the benefits, joys, frustrations, and economic realities of farming.
- To help consolidate information and create a platform to share information targeted at producers, food businesses, investors, new farmers, and the general public.
- To help raise awareness within the CVRD to equip elected officials and staff with information to effectively engage with the agricultural sector.
- To develop targeted communication for producers around enabling shifts towards business viability (e.g. on-site water storage and emergency preparedness, programs for compensating producers for ecological goods and services; farm labour pool; food hub).



Each of these strategic areas could benefit from a range of communication and awareness mediums from one-on-one relationship building, farm tours, and meetings to on-line information platforms and community calendars. The updated CVAP could identify the creation of an agricultural communication and awareness strategy as a starting point for coordinating and prioritizing actions.

### 6.3 Central theme 3: Create a strong implementation plan

Given that roles and responsibilities for implementing any agricultural plan are shared across departments, governments and sectors, a detailed implementation plan is a necessary starting point. Showing which entities are taking on lead and support roles, an estimate of resources needed, approximate timeline, and identifying priorities will help staff to develop workplans and budgets that are supportive and aligned with implementing the updated CVAP.

Considerations for the CVAP implementation plan include:

- Understanding roles and responsibilities of the many organizations in the region and beyond that are actively working to support the sector is key to effective implementation and ensuring good relationships.
- An annual report card attached to the implementation plan can help to track progress and celebrate success.
- A good implementation plan considers the level of capacities and resources available.

## 7.0 Additional Areas of Interest

Several additional areas of interest related to local agriculture and the food system emerged throughout the engagement process, and are summarized in Table 2. The forthcoming Agricultural Plan Update will provide direction as to which should be initiated at a regional level in order for municipal assets and resources to be considered, while others can be approached by rural areas alone. Some of these would be best achieved by taking a cohesive regional approach while others are best managed via leadership by the rural areas.

*Table 2. Additional areas of interest related to local agriculture and the food system.*

Area of Interest	Regional Approach	Rural Approach
Complete an assessment of the <i>Economic and Environmental Value of Agriculture in the CVRD</i> .		X
Undertake a <i>Market Opportunities in Comox Valley Agriculture</i> study to explore what crops/products are best suited to the area and complete a gap analysis to examine how to improve profit margins for the agricultural sector.		X
Develop a regional <i>Food Security Plan</i> that complements the CVAP and other CVRD plans and considers both household and community food security.	X	
Map regional agriculture assets and infrastructure for use in emergency management (e.g. food storage assets, transportation routes, etc.).	X	
Complete a feasibility study for compensating producers for ecological goods and services provided by farmland (e.g. flood water management, wildlife).	X	
Explore an Agricultural Service, which would build on the current role of the Agricultural Coordinator.	X	
Continue to explore a Water Resource Stewardship Service and integrate agricultural priorities and concerns into the scope of work.	X	

While it may be appealing to embark upon these as discrete projects, there is benefit to having an updated Comox Valley Agricultural Plan provide an umbrella for these initiatives, in order to collectively move the community towards solutions for challenges heard during the engagement process, while also considering the need for additional rural and regional efforts that will support local agriculture and the food system. This will help to ensure that the objectives, process, and outcomes are not impacted by local government staff turnover, changes in leadership with the agricultural community, and/or other sector ebbs and flows.

## 8.0 A Draft CVAP Vision and Next Steps

The recommended next step at this stage is to draft the CVAP Update and bring it to the community for feedback and input. A draft vision statement, based on the previous CVAP and on input received through the engagement process is presented below:

### Vision Statement for the CVAP

*The food-producing history of the Comox Valley, including during pre-colonial times when Indigenous food systems were abundant, will continue to influence this growing sector of the local economy today and into the future. With a mix of small, medium and large-scale enterprises focused on a diversity of markets, the Valley's farms will produce quality products. Farmers will be supported in their stewardship of land and water resources and become resilient to the impacts of climate change. The community will nurture a new generation of farmers with the capacity and resources to adapt and innovate in order to continue to build a thriving agriculture and food system in the Comox Valley.*

As immediate next steps, this Interim Report will be presented to the Project Advisory Committee for information and discussion and to the EASC for endorsement and direction.

The consulting team will then proceed to complete the CVAP Update which will include the development of clear recommendations and an associated implementation strategy.



## Appendix I – Areas of Influence of Local Governments in Agricultural Planning

The following 10 areas are examples of some of the ways local government policies and bylaws can influence and have an impact on agriculture. This is not a comprehensive list, however it provides examples for key topics related to agriculture.

**1. Land use planning for agriculture:** Local governments are required by the *Agricultural Land Commission Act* (ALCA) to consider and show Agricultural Land Reserve (ALR) in land use plans such as Official Community Plans (OCPs) and Regional Growth Strategies (RGS). Local governments can also use zoning bylaws (ZBLs) to allow agriculture in additional areas such as rural residential. Currently, existing OCPs, ZBLs, and RGS in the Comox Valley Regional District (CVRD) include agriculture but may need to be updated to reflect current conditions, as changes to the ALCA have occurred.

**2. Housing on farmland:** Local governments can be more restrictive than what is allowed by the Agricultural Land Commission (ALC) (e.g. allow smaller or fewer houses) but cannot be less restrictive (e.g. allow larger or more houses) and may include complementary regulations (e.g. setbacks). Currently, the CVRD reviews housing development proposals in the ALR. The modernized 2023 Agricultural Plan can reflect any changes in provincial regulations.

**3. Agri-tourism:** Within the ALR, tourism and related accommodations are regulated by the ALC. Local governments can be more restrictive, even prohibiting tourism accommodation entirely in their bylaws, but they can't be less restrictive than the provincial regulations. The 2002 CVAP resulted in a ZBL update to enable agritourism accommodations in a manner that supports agriculture as a primary use.

**4. Managing Development Near Farmland through DPAs:** One way to manage development near farmland is to designate Development Permit Areas (DPAs) for the protection of farming on properties adjacent to (but outside of) the ALR. The CVRD requires a development permit for any construction on neighbouring residential or commercial/industrial lands within 30 metres of land that is designated as Agricultural Area or the ALR boundary. The permit may require screening, landscaping, and fencing along that border at the time of development.

**5. Water Management for Agriculture:** The CVRD has also developed the *Tsolum River Agricultural Watershed Plan* that has specific recommendations for agriculture. These recommendations can be reflected and amplified through the Agricultural Plan. Watershed stewardship and conservation priorities can also be included within the recommendations of the plan.

**6. Waste Management for Agriculture:** Local government solid waste facilities (e.g. landfills and recycling centres) can provide services for farms, such as wood chipping and green waste composting. Some local governments provide farmers with reduced tipping fees.

**7. Compliance and Enforcement for Agriculture:** Local governments can work with the ALC to increase enforcement of rules on farmland to discourage illegal dumping of fill, truck parking, or other non-agricultural uses of the land.

**8. Communications for Agriculture:** Local governments can communicate the benefits of having agriculture in the region to urban and rural residents. This can include the use of websites, social media posts, online videos, road signs, and festivals or celebrations.

**9. Agricultural Economic Development:** Economic development initiatives can promote agricultural businesses to local residents and tourists and help fund research related to the local agriculture and food sector. The CVRD has identified agriculture in economic initiatives and is currently working with the community on a food processing hub.

**10. Agricultural Committees or Commissions:** Local governments can establish Agricultural Advisory Committees or Commissions (AACs) that provide advice on planning decisions that impact agriculture.

AACs are often involved in, and support, projects aimed at promoting public awareness, diversification and growth of the agriculture sector and can advise the Board of Directors on matters regarding the agricultural sector. The CVRD has an active Agricultural Advisory Planning Commission.



## Appendix II: Engagement Summary Report

# Engagement Summary Report –

Comox Valley Regional District Agricultural Plan Update



JUNE 2023

PREPARED BY



IN ASSOCIATION WITH



## Acronyms

AF	Ministry of Agriculture and Food
ALC	Agricultural Land Commission
ALR	Agricultural Land Reserve
BC	British Columbia
CVAP	Comox Valley Agriculture Plan
CVEX	Comox Valley Exhibition
CVFPC	Comox Valley Food Policy Council
CVFI	Comox Valley Farmers Institute
CVFMA	Comox Valley Farmers Market Association
CVFPC	Comox Valley Food Policy Council
CVRD	Comox Valley Regional District
MIFI	Mid-Islands Farmers Institute
YA	Young Agrarians

## 1.0 Introduction

It has been over 20 years since the development of the Comox Valley Agricultural Plan (CVAP), approved in 2002, which was one of the first Agricultural Plans in the province. Due to the evolving nature of the agriculture and food sectors and the regulations surrounding land-use planning policies, the Comox Valley Regional District (CVRD) has embarked on a project to update and modernize the CVAP 2002. The project process to update the CVAP 2002 includes background research and analysis, a high-level overview of policies relevant to agriculture, and engagement with the agriculture sector and the public, which will culminate in a Comox Valley Regional District Agricultural Plan (CVAP 2023). The primary objective of the CVAP 2023 is to produce a comprehensive agricultural planning document that focuses on CVRD jurisdiction and identifies opportunities to strengthen the regional agricultural sector and contribute to its long-term sustainability. The CVAP 2023 will propose recommended actions that anticipate future changes and challenges specific to the CVRD to support regional planning efforts.

The CVAP 2023 project was initiated in April 2022. From April 2022 until July 2023 project activities included: a review of the 2002 CVAP, an update of the current trends in the Comox Valley agricultural, an analysis of policies and regulations relating to the agriculture sector in the CVRD, and a robust engagement approach. These project activities culminated in the following reports:

- *Evaluation of the 2002 Comox Valley Agricultural Plan*
- [Background Report: 2023 Comox Valley Agricultural Plan](#)
- [Draft Interim Report](#)
- *Final Interim Report*
- *Engagement Summary Report*

This report provides the details of all engagement activities and feedback received. These engagement results, along with the research results from the other reports, inform the key themes and recommendations that are found within this Final Interim Report.

## 2.0 Engagement Overview

Engagement is at the core of the process to develop the CVAP 2023. Led by the consultants and guided by the CVRD, engagement activities took place over approximately 10 months (Fall 2022 to Spring 2023). There were two distinct rounds of engagement:

- 3) The first round developed an understanding of the challenges, and opportunities facing the sector, primarily through interviews and Project Advisory Committee Meetings, and
- 4) The second round dove deeper on the key areas of concern identified in round one, primarily through themed community workshops and online survey, focus group meetings, a webinar and written submissions.

The CVAP 2023 process held space for the involvement of the K'omoks First Nation and communications were led by the CVRD leadership. A consultant for K'omoks First Nation provided content regarding pre-colonial food systems within the community, which was included in the Background Report. However, to date, there has been no other direct feedback from, K'omoks First Nation regarding the CVAP 2023.

## 2.1 Engagement Objectives

Engagement activities were undertaken to achieve the following objectives:

- Engage the local agriculture and food sector to identifying existing food and agriculture assets, gaps, challenges, and opportunities with an overall eye of identifying directions for the CVAP 2023.
- Engage a diverse range of producers, processors and agricultural players in terms of demographics and commodity groups, particularly those based in the CVRD's Electoral Areas.
- Provide elected officials with a clear overview of key priorities of the local agriculture and agri-food sector.

## 2.2 Engagement Methods

A variety of engagement methods were used to ensure meaningful feedback.

### Interviews

The consultant team conducted one-on-one interviews with 29 individuals in the Fall of 2022. The majority of interviewees were farmers and ranchers. Other interviewees included representatives from local agri-food sector organizations and local and provincial governments. Interview questions focussed on the experiences of the interviewees with regards to agriculture, what key challenges or barriers exist, and what solutions or opportunities they envision for moving the sector forward. The interviews contributed to the background context of agriculture in the Comox Valley including the challenges, opportunities, and benefits of farming in the region. Furthermore, the interview process helped to inform the establishment of the Advisory Committee, development of further engagement tactics, and inform the recommendations and actions in the final interim report.

### Project Advisory Committee Meetings

An Advisory Committee (AC) was formed to assist in providing critical feedback at important steps along the project timeline. Advisory Committee positions were advertised through print media, online (social media), and via email. Interested members of the public were encouraged to complete an application and submit it to the CVRD for consideration and 13 members were selected. The AC members were mainly agricultural producers and farm operators and were selected based on their agriculture and agri-food expertise. A Terms of Reference was developed for the AC to help guide meetings. Meetings occurred in November 2022, December 2023, February 2023, and another is planned for late summer 2023.

### Focus Group Meetings with Local Organizations

Three online, facilitated focus group meetings were held with the leadership teams of key local agricultural organizations in April 2023:

- Comox Valley Farmers' Institute (5 attendees)
- Mid-Island Farmers' Institute (4 attendees)
- Comox Valley Farmers' Market Association (9 attendees)

The meetings consisted of a review of strategic areas of influence that the CVRD can have in agricultural planning, presentation on the CVAP Interim Report, and roundtable discussions regarding priority area for each organization, including identifying challenges, opportunities, areas for further consideration, as well as validating perspectives already gleaned through engagement and review.

### Themed Community Workshops and Online Survey

Four community workshops were held during May 2023 at Merville Hall. Each workshop consisted of a theme relating to the agriculture sector. The themed workshops brought farmers, processors, and other agriculture players together who may not usually have the opportunity to meet with one another. These themed workshops were based on key issues that arose during the initial rounds of engagement, including:

- Land Use Planning
- Emergency Planning and Preparedness
- Water and Agriculture
- Business Viability

In advance of the workshops, the project team met with CVRD staff to better understand what initiatives related to each theme are already underway in the CVRD, and possible topics to discuss during the workshops. In total, 35 people attended the sessions.

The questions discussed during the Themed Workshops provided both in hard copy and online for those who could not attend the workshop sessions but who wanted to contribute their feedback. A total of three (3) people provided feedback using this method. In addition, recordings of workshop presentations were posted online for those wishing to learn more about each topic.

### Webinar

On June 8, 2023, an online webinar was held to provide another avenue of engagement for any members of the agri-food sector, local organizations involved in agriculture and food security and the public. The objective of this webinar was to present the feedback received during the Themed Workshops and identify any other issues not captured by the workshops that are important for the local agriculture and food sector. Eight (8) people attended this webinar.

### Written Submissions

Throughout the project's process, there was ongoing opportunity for anyone to submit written comments to the consultants or CVRD staff about the challenges and opportunities for CVRD to support the local agriculture sector. A total of seven (7) written submissions were received.

## 2.3 Profile of Engagement Participants

The engagement methods reached many individuals within the local agriculture and agri-food sector in the Comox Valley. Almost three quarters (72%) of people who provided input were agricultural producers (farmers and ranchers), many of whom are also involved in processing their products. Farms of all sizes, ranging from less than an acre to hundreds of acres, were engaged and provided input. The farms represented the wide diversity of agricultural activities occurring in the Comox Valley and included cattle ranches, dairy farms, poultry farms, flower, fruit, and vegetable farms, mixed vegetable and livestock farms, nurseries, hay and grain farming, and wineries. Other types of stakeholders engaged included the public, and the following local agriculture and food organizations and government representatives:

- Comox Valley Farmers' Institute
- Mid-Island Farmers' Institute
- Comox Valley Farmers' Market Association
- Comox Valley Food Policy Council
- LUSH Valley
- School Meal Programs & Farm to School

- Vancouver Island University Seafood Innovation Centre
- Island Health
- Elected officials from CVRD and the City of Courtenay, Council
- CVRD staff
- Ministry of Agriculture and Food staff

The following is the breakdown of stakeholder category who were engaged and participated in the process:

- Producers and/or Processors: 72%
- Local government council, staff or provincial staff: 12%
- Local organizations: 10%
- General public: 6%

Many people who engaged in the process are often involved in numerous capacities within the sector. For example, farmers and ranchers also may be members of local organizations and farmers' institutions. Some individuals also attended multiple engagement events.

The following table provides a further breakdown by engagement activity of the stakeholder category:

Engagement Activity	Category of Stakeholder	Percentage
<b>Interviews:</b> 29 stakeholders	Producer and/or Processor (21)	73%
	Local Organizations (5)	17%
	Local/Provincial Government (3)	10%
<b>Project Advisory Committee:</b> 13 stakeholders	Producer and/or Processor (12)	92%
	Local/Provincial Government (1)	8%
<b>Focus Group Meetings:</b> 18 stakeholders	Producer and/or Processor (18)	100%
<b>Themed Workshops:</b> 35 stakeholders	Producer and/or Processor (20)	57%
	Local/Provincial Government (8)	23%
	Local Organizations (4)	11%
	General Public (3)	9%
<b>Online Submissions</b> 3 stakeholders	No category selected (3)	100%
<b>Webinar:</b> 8 stakeholders	Producer and/or Processor (3)	38%
	General Public (3)	38%
	Local Organizations (1)	12%
	Provincial Government (1)	12%
<b>Written Submissions:</b> 7 stakeholders	Producer and/or Processor (3)	43%
	Local Organizations (4)	57%



## 3.0 Engagement Results

This section provides a summary of the feedback collected during each engagement activity.

### 3.1 Round 1 Engagement Results

Round 1 of engagement took place in late 2022 and sought to engage with the agriculture sector to understand the current situation for the agriculture sector in Comox Valley, including the challenges and opportunities facing the sector. Engagement with the agriculture sector included 29 stakeholder interviews and 3 Project Advisory Committee Meetings, which revealed key themes as described below. Round 1 engagement also included staff meetings to review the 2002 CVAP.

#### Passionate Agricultural Community

The Comox Valley has a strong agricultural community, holding generations of invaluable knowledge. Interviewees noted that one of Comox Valley's greatest strengths is a long and rich history of agricultural production, with generations of knowledge and experience in farming, foraging and harvesting in the region's climate and landscapes. Within Comox Valley there are two Farmers Institutes. These organizations sometimes present divergent perspectives on topics of interest. However, holding space for diversity while encouraging collaborative efforts provides better outcomes on issues that impact the wider agricultural community. Early feedback also pointed to a disconnect between local governments' understanding of agriculture and the realities on the ground. The new support role of the CVRD Agricultural Coordinator provides hope that these disconnects will be minimized over time. Engaging producers and leaning more into the expertise of the AAC could improve the capacity for the region to support agriculture.

#### Market Diversity Leads to Sector Strength

Producers based in the Comox Valley sell their products to a wide diversity of markets, from the farm-gate to international customers. The route to market is dictated by many economic drivers and indicators including commodity type, processing availability, storage capacity, transportation and distribution options, and customer base. This market diversity builds resiliency into the sector such that if one market fails or is in flux, the entire sector is not made vulnerable. A strong sector leads to improved agricultural supports and services, as well as access to agri-food resources such as seed supply, feed mills, and processing facilities. However, it was also noted from interviewees that the amount of food being produced in the valley has been on a decline over the past 100 years. Interview findings pointed to rising costs of land, transportation, and inputs such as equipment, seeds, fertilizers, packaging, and feed as one of the core struggles at making farming profitable. In addition to this, lack of processing facilities for meat, dairy and vegetables, all threatened the long-term sustainability of the industry and the region's self-sufficiency. Many producers noted that slaughter and butcher capacity of the Valley was insufficient. With the only red meat abattoir maintaining a wait list of up to 1-year, many producers choose to send animals off island for slaughter and therefore those end products are not necessarily available to residents. Small scale producers pointed to a lagging timeline for the food-hub development.

#### Climate Change and Water Management are Key Concerns

The Comox Valley is experiencing the impacts of climate change through changing hydrological systems. Water management is one of the key issues in Comox Valley, producers note the changing hydrological systems are compromising water availability in the summer and creating drainage issues in the spring which

are threatening the viability of the farming sector. Producers stated that there is a need for further support on developing dugouts, in the way of accessible information about where funding can be found, and regulatory advocacy. Many producers also noted a sense that the government and general population perceives members of the agriculture sector as being water wasters, rather than water stewards. Producers noted that there is a need to balance the needs of urban and rural water users, as well as provide information and messaging around agricultural water use during times of drought.

### Farmland Protection is Critical

The Comox Valley is a highly desirable place to live, and thus experiences the pressure of urbanization of agricultural land. Many producers pointed to concerns regarding potential shifting of urban boundaries and subdivision of ALR land (or small minimum lot sizes) which often leads to the creation of rural estates rather than small farms. It was also noted that increasing prices of farmland is reducing affordability for farmers to expand their operations or for new entrants to begin financially viable operations. Additionally, many interviewees cited a lack of enforcement on ALR infringements as a contributor to loss of farmland and suggested the CVRD could play a role in enforcement of these infringements.

### New Entrants are needed to Ensure Sustainability

While the Comox Valley has a rich and long history of agriculture, food production and food harvesting, new entrants into the industry often find it difficult or impossible to build a profitable farm, with many new farmers in the region leaving agriculture within the first five years, leading to a somewhat transient local agricultural community. New farmers are often relying on grant programs and bank loans, which are unsustainable and frequently result in the need to close the farm.

## 3.2 Round 2 Engagement Results

Round 2 of engagement took place from January to June 2023 and sought to collect feedback from on the draft interim report and dive deeper on the key theme areas identified during Round 1 of engagement. Round 2 consisted of focus group meetings with agricultural organizations, CVRD staff meetings, in-person community workshops and online survey, a webinar and written submissions.

### 3.2.1 Focus Group Meetings with Local Organizations (April 2023)

Organization	Priority Areas and Issues of Concern
Comox Valley Farmers Market Association	<ul style="list-style-type: none"> <li>• Would like to expand number of farmers markets in the region.</li> <li>• Prioritize finding a permanent home for the farmers market.</li> <li>• Will develop a strategic plan for the CVFMA.</li> </ul>
Comox Valley Farmers Institute	<ul style="list-style-type: none"> <li>• Would like to increase agri-food education opportunities for the community and elected officials.</li> <li>• Must ensure that the role of agriculture in relation to climate change is better understood by local government.</li> <li>• Would like to secure a permanent location for the farmers market.</li> </ul>
Mid-Island Farmers Institute	<ul style="list-style-type: none"> <li>• Plans to continue to host an annual agriculture conference, and to facilitate regional farm tours.</li> <li>• Would like to find solutions to insurance challenges for producers.</li> <li>• Will continue to participate in the Food Hub Stewardship Group.</li> </ul>

<b>Focus Group Meetings:</b> 18 stakeholders	Producer and/or Processor (18)	100%
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Results from these three focus group meetings resulted in the following themes:

[There is the need and opportunity to increase productivity of agricultural land.](#)

Addressing the challenge of accessing land for farming and the utilization of agricultural land for farming is a significant priority. Ensuring the viability of small-scale farming and supporting new and young farmers is crucial in the context of numerous farmers having relatively small plots of land, such as 5 acres and under. Efforts should be made to encourage and facilitate the utilization of these small parcels for agricultural purposes. To discourage non-farming buyers, there is a need to impose higher taxes on idle farmland, reducing its appeal. Additionally, it is important to divert non-land based production, such as greenhouse cultivation and cannabis farming, away from prime agricultural land and instead direct it towards non-agricultural or less fertile areas. Rather than imposing restrictions, a more effective approach would involve zoning specific land for these purposes.

[Development of infrastructure to support agriculture and related businesses is essential for fostering growth and sustainability.](#)

Some specific needs and opportunities could include the establishment of shared freezer facilities for meat producers, accessible commercial kitchen spaces for vendors with irregular usage requirements, and shared on-farm equipment. Furthermore, promoting interconnection between food producers and processors can encourage the use of local products by food processors. Introducing a local food branding initiative, such as a "Buy CV" sticker, would help consumers easily identify and support local food. Addressing the scarcity of abattoirs is crucial, and the CVRD could play a role in reducing unnecessary regulations and streamlining licensing processes for these facilities. Improving the farmers' market experience is another priority, including the establishment of a permanent location and ensuring public transit accessibility for better food security. Farmers' markets also serve as business incubators, supporting the growth of farmers and fostering entrepreneurship. Lastly, expanding the number of markets in the region would create more opportunities for local producers and enhance food access for the community. The agriplex/exhibition grounds could be a great asset and more work is required with the agricultural sector and CVRD to determine potential opportunities for this infrastructure to support the agriculture sector.

[Water access and availability is a persistent challenge for producers and needs to be addressed from a land use planning perspective.](#)

Obtaining provincial water licenses from the province is bottle-necked, but the CVRD can advocate for faster processing. Climate change is affecting crop growth and water availability, highlighting the urgent need for water storage at both farm and regional levels. On-farm water storage benefits the entire community, including fish habitats, and farmers should be compensated for their efforts. Creating dugouts can lead to confusing overlap with the Water Sustainability Act if groundwater levels rise during the wet season and interact with the water in the dugout. Increasing access to irrigation options for new farmers and improving irrigation systems and districts, such as the potential Wolf Lake water storage project, is

crucial. Consistency in watercourse regulation by provincial government departments, including considerations for fish habitat, ditch cleaning, and riparian areas, is also needed. Forestry practices need stricter government oversight to prevent denuded hills and insufficiently bordered creeks, which lead to excessive flows and flooding.

[Urban/rural conflicts create challenges for producers and are intensifying with increased development near the agricultural edge.](#)

Implementing edge planning and management strategies could help mitigate conflicts between urban and rural areas. Unresolved issues arise when people fail to close gates on trails, leading to livestock escaping, and farmers are unfairly charged for negligence; for example, dog bylaws are applied in towns, yet farmers bear the brunt of conflicts with livestock due to tourists or recreationalists and off-leash dogs, or gates being left open. There is a lack of consideration for farm vehicles in road use decisions, such as the inclusion of bicycle lanes, and often drivers do not respect slow moving farm equipment on roads. It is essential to make it mandatory for any development to take agricultural considerations into account, to reduce conflicts between urban and rural areas.

[Leading and supporting education and awareness for agricultural and related businesses as well as the public is a key role for the CVRD.](#)

Increasing awareness of the agriculture sector among the public, CVRD staff, and elected officials is necessary. Supporting Farmers Institutes in organizing farm tours and encouraging the participation of elected officials in these events is important. CVRD should do what they can to ensure the Comox Valley Annual Exhibition event happens each year and agricultural is prominently included in the event. To provide information and resources, the CVRD should have an agricultural webpage on their website. This webpage could include resources such as the Farmer Handbook, agricultural bylaws for individuals moving into agricultural land, information packages about living near farmland, maps of farms and farm stands, retail stores selling local foods, and information about farmers' institutes. It is crucial to emphasize that the region is an active agricultural landscape. Additionally, prioritizing local food procurement in public buildings, schools, CVRD facilities, and other institutions can promote and support the local agricultural industry.

[Improving CVRD communications and engagement with producers would help to build a shared understanding of what is needed and how to work together towards common goals.](#)

Improving communication between the CVRD and the agriculture sector is crucial. The CVRD is encouraged to actively participate in Farmers' Institute meetings and engage with the agricultural sector. Consistent communication with Farmers' Institutes should be established, and efforts should be made to build trust over time. To foster dialogue, the CVRD could organize informal coffee meetings with staff and elected officials to discuss agricultural issues and the CVRD's initiatives in the sector. Ensuring the permanence of the Agricultural Advisory Committee is important. Moreover, compensating farmers who volunteer for committee roles should be included in project budgets. There is sometimes a lack of clear communication regarding land use permits on farms. For example, farmers who proactively communicate their plans to the CVRD have encountered challenges when staff members struggle to process agricultural land use requests across different departments. Creating a checklist for farmers outlining the process and necessary permits for specific activities on their lands would facilitate communication and provide clarity for both farmers and CVRD staff.

### Increasing capacity for compliance and enforcement is needed in the region.

Addressing non-compliance issues on ALR lands and promoting enforcement is needed in the region and collaboration between the CVRD and the ALC is essential in this regard. Mechanisms for enforcing non-compliance and supporting farmers could be established, and the CVRD should explore how it can assist in this process. It is suggested that the CVRD create a platform for farmer complaints regarding neighbors interfering with regular farm use or non-farm use on ALR lands, providing clearer information on how to address such issues. Involving the real estate industry is another avenue, with the CVRD advocating for awareness through a memo outlining what it means to live in active farming areas. Additionally, while biosolid dumping is permitted, it is important for the CVRD to notify neighboring residents when such activities occur, given the potential risks to animals and watercourses.

### Other comments from the Focus Group sessions:

- There are often divergent viewpoints within the local agriculture sector on a variety of issues.
- Many issues at the time of the 2002 CVAP are still relevant.
- The CVRD could integrate agriculture more effectively into planning decisions in the electoral areas and work with municipalities of Courtenay, Comox, and Cumberland to better understand the important role agriculture plays in the region as well as develop short to long range policies that consider agriculture.
- The agriculture sector felt unheard during the Greenhouse Gas Emissions Inventory project and did not feel represented in terms of the benefits local agriculture and agricultural practices provides to the region.
- Waste management options for farm debris are needed. For example, on-farm burning is the most cost-effective way to manage crop waste but burning bans have effectively eliminated that option. CVRD could support chipping wastes when possible, for example, by helping to cover costs for alternative disposal methods such as wood chipper rentals.
- Would like to see Farmers Institutes included as key partners in the updated Agricultural Plan.
- The updated Plan should include a report card which is provided to stakeholders on an annual basis, so they know the progress of the plan implementation.
- The CVRD should coordinate regular meetings with all farmers for update on Plan status once created to inform about what items are being worked on, by whom and what the targets are for implementation.

### 3.2.2 CVRD Staff Planning Meetings (April 2023)

In preparation for the Themed Community Meetings, four staff meetings were held to understand the CVRD perspective on the key themes identified in the planning process, and to help guide the planning and execution of the upcoming meetings. Each of the four staff planning meetings aligned with one theme for the upcoming community meetings and included relevant CVRD staff members who were most knowledgeable on the subject matter. In addition to CVRD staff, representatives from the Comox Valley Emergency Program and Comox Valley Fire Department attended the meetings.

The following meetings took place:

- Planning and Development Services Department: to discuss Land Use Planning, Parks, and Climate Action and Agriculture

- Liquid and Solid Waste Management Services Department: to discuss Water Services and Waste Management Services and Agriculture
- Oyster River Fire Department, Comox Valley Emergency Program, Ministry of Agriculture and Food: to discuss Emergency Planning and Agriculture
- Economic Development Coordinator: to discuss Farm Business Viability

### 3.2.3 Themed Community Workshops and Online Survey (May 2023)

The following summarizes the discussions during the themed community workshops and the responses from the online survey.

<b>Themed Workshops:</b>  35 stakeholders	Producer and/or Processor (20)	57%
	Local/Provincial Government (8)	23%
	Local Organizations (4)	11%
	General Public (3)	9%

#### Theme 1: Land-Use Planning and Agriculture

There are several land use planning decisions that affect the agricultural community, such as housing and transportation (e.g., transit options). One major difficulty is the succession process when multiple families wish to continue farming, but housing and subdivisions regulations make it challenging for retiring farmers to transition their operation to adult children. Additionally, transit poses a problem for labour, particularly in rural areas where the bus schedule does not run on weekends, making it difficult for farmers to access workforce who often does not own cars. The CVRD could assist by establishing designated farmworker housing in zoning or providing alternatives like campsites with amenities. It is crucial to direct development towards existing urban areas and employing planning bylaws for edge planning. Regulations should include buffering on the non-ALR side and adherence to CVRD Development Permit Areas (DPAs). Stronger compliance and enforcement measures are necessary on ALR land and non-ALR lands alike. There have been conflicts between trail users and farmers, which the CVRD can help mitigate through enforced on-leash bylaws, improved signage, fencing, gates, barriers, and public education regarding recreational activities near or on farmland. Increasing signage on roads to communicate agricultural vehicle usage and educating the broader community about the benefits of living in active agricultural areas are important. The CVRD should continue to protect the ALR from development and protect the preservation of fertile land outside of the ALR, including small lots which can be viable for farming.

#### Theme 2: Emergency Planning and Agriculture

In emergency situations, it is crucial to consider local food production as a means of ensuring food security. Registering hobby farms, along with commercial farms, for emergency management purposes should be prioritized for effective coordination and response efforts and is a requirement under the provincial PremisesID program. The concept of buddy farms, where farmers work together to plan for livestock evacuation during emergencies, should be promoted and facilitated through meetings organized by farmers' institutes. Creating an inventory of farming assets (including on-farm water storage for firefighting purposes, crucial roads, food storage, etc.), would be useful to help prioritize resources during



emergencies. Collaboration with the CVRD and farmers' institutes could help document agricultural infrastructure for the entire region. The CVRD can play a role by investing in, supporting, and advocating for regional food storage initiatives, such as a grain reserve. Additionally, food hubs can serve as storage facilities during emergencies. It is important to recognize and appreciate the existing contribution of local agriculture in reducing transportation needs and the logistical challenges associated with imports and exports. The CVRD can further support emergency management efforts by organizing workshops in collaboration with farmers' institutes.

### Theme 3: Agricultural Priorities for Water Management

Access to water is the most crucial factor for maintaining farm viability. It is essential to prioritize water usage for agriculture and food processing and to give lower priority to commercial activities like water bottling plants – when local drinking/potable water is already great quality and bottled water is unnecessary. Increasing water metering and permitting for residential users is necessary to regulate water usage. It is important to recognize that residential developments often have a negative impact on the entire water system due to changes in land cover, such as increased impermeable surfaces, compared to farming. Increasing public education and communication regarding water issues, management, and drought is important. Establishing a regional watershed stewardship service, with representation from the agriculture sector, would be beneficial. This service could provide several benefits, including resources for existing watershed groups to monitor wells. Affordable on-farm water storage options are needed to ensure water availability. The CVRD could advocate to the Province to reduce regulations associated with water dugouts and groundwater levels. The CVRD could advocate to the Province and Department of Fisheries and Oceans to improve the management of ditches to prevent flooding onto agricultural lands. The CVRD should also advocate for better forestry practices in upland areas to minimize negative impacts on downstream water sources. The CVRD should also continue implementation of the Tsolum River Agricultural Watershed Management Plan.

### Theme 4: Business Viability in the local agriculture sector

Various challenges identified for farm business viability include the high costs of on-farm insurance and farm inputs, labor capacity issues, and the need for affordable housing for agricultural workers. To support agricultural businesses, there is a need for more suppliers of farm equipment in the region, additional meat processing facilities, local networking opportunities, knowledge transfer, and extension support. A guaranteed minimum income could also be beneficial. One of the key suggestions is the establishment of a permanent site for a year-round Farmers' Market, with the CVRD and municipalities offering reduced rent to support this initiative. The Farmers' Market serves as an important platform for supporting new entrants into farming. CVRD could also support Young Agrarians (YA) and promote events. With respect to agri-tourism, there is a need for a better-coordinated Growers Guide for the region. Integrating agri-tourism into a regional tourism initiative would also be beneficial, though producers are mixed on whether they would like to participate on hosting on-farm activities. Regarding the proposed Food Hub, many participants supported having the initiative resolved through implementation. Some indicated that the Food Hub should focus on livestock processing, storage, and the aggregation of meat products while others preferred a more open approach.

### Other comments:

- Urban agriculture and food security should be addressed by the CVRD in planning documents or through future studies.

- The intersection of climate change and ecosystem services with the agriculture sector should be acknowledged in the plan and by the CVRD.
- It is important to acknowledge the current and potential capacity of agriculture to adapt to the impacts of climate change and contribute to its mitigation efforts.

### 3.2.4 Webinar (June 2023)

An online webinar was held on June 8<sup>th</sup>, 2023, and was open to all members of the public. The following provides a summary of the discussion during the webinar. A total of 8 stakeholders attended.

<b>Webinar:</b>  8 stakeholders	Producer and/or Processor (3)	38%
	General Public (3)	38%
	Local Organizations (1)	12%
	Provincial Government (1)	12%

Issues identified during the webinar included:

- The need for improved transit options for farm workers to connect between farms and urban areas.
- Highlighting the huge increase in costs for farm inputs.
- Water is a very big issue for farmers and CVRD needs to have an agriculture first lens when it comes to water management.
- Forest management decisions are having upstream impacts on watersheds which negatively impact farms downstream.
- The region needs to attract and retain new entrants as farmers are retiring.

Roles for the CVRD that were identified include:

- **Advocacy:** When issues fall outside of CVRD jurisdiction, they need to be a strong advocate to the province on behalf of the sector.
- **CVRD Agricultural Service:** If an agricultural service is established, it could include activities such as coordination of emergency management for the sector.
- **Agricultural Coordinator:** The farming community appreciates a local touch point through an agricultural coordinator to help provide extension support. The CVRD could engage with Farmers Institutes about what the agricultural coordinator job position could entail, for example:
  - Helping to host events or facilitate venues for events that the Ministry can host.
  - Help coordinate emergency management with the province.
  - Oversee an online centralized space where all the events are going on can be advertised – e.g., agricultural online calendar – CVRD could build this onto their website that is maintained and post/promote events.
  - Conduct or coordinate studies.
  - Identify initiatives/organizations that already work so CVRD can support them.

- Connect new entrants.
  - Help with education in schools and to the general public (e.g., news articles).
  - Inform farmers of funding opportunities and keep a list of approved companies that can do on the groundwork (e.g., constructing dugouts).
- Incubator Farms: The concept of an incubator farm has been introduced by various community groups over time. The Incubator Farm would provide support for new entrants in the agricultural industry. Collaboration with existing organizations and local post-secondary educational institutions, such as LUSH, North Island College, and YA, could facilitate its implementation. CVRD could explore the possibility of utilizing public lands owned by the CVRD, including the exhibition grounds. Ensuring that there is a demand for such an initiative in the Comox Valley is a crucial aspect of its development.
  - Education: Promoting agriculture in the school curriculum and involving organizations like the 4H club is important. Raising awareness among the public and CVRD staff about the environmental values of farmland and supporting existing programs like Farmland Advantage is crucial. The CVRD can play a role in hosting, facilitating, and assisting with events that promote the agricultural sector, such as organizing the "eat local challenge" to encourage the consumption of locally produced food.
  - Opportunities to collaborate with Komoks First Nation: CVRD has informed Komoks First Nation of this process and there is an open door for any input, feedback, collaborative opportunities.
  - Future Studies: The following topics for future studies were suggested:
    - A Food Security Plan that complements the agricultural plan and other CVRD plans
    - A detailed analysis of the economic value of agriculture in the CVRD study (including comparison with other sectors). The Comox Valley Farmers Market Association is participating in economic benefits study in 2023 across all three farmers markets, which could tie into this broader, regional study.
    - A Market Opportunities study for farmers about what crops/products to grow and where (e.g., looking at soil type, water availability/drainage, market demand and matching land to potential crops to grow).
    - Mapping for use of agricultural assets and infrastructure during emergency management (e.g., food storage assets, transportation routes, etc.).
    - A gap analysis looking at why farmers under 10k revenue category remain there (e.g., what are the challenges and barrier they face to growth).
    - A Market Opportunities study for farm inputs – substituting imported inputs with island produced inputs (e.g., marine based fertilizers)

### 3.2.5 Written Submissions (May – June 2023)

Eight (8) written submissions were received – three from organizations and five from individuals - and key points from each are summarized below, presented in the order in which they were received:

#### Comox Valley Farmers Institute

### Theme 1: Water, Land Use, Environment, and Climate Change

- Inaccurate perception that the agriculture sector is not an efficient user of water.
- Need to talk about long term water storage options for agriculture.
- CVRD can advocate and work with province to enhance and encourage large-scale and farm-scale water storage options (e.g., Wolf Lake studies).
- Valley-wide irrigation system is needed, would like to discuss a regional irrigation governance system.
- CVRD can advocate with the province to maintain rural ditches.
- CVRD can work with the province to better understand and advocate for improved forest and water management practices, which will improve drainage and minimize flooding.
- Need to work with farmers to better manage recreation and use of parks and trails near farming areas. Issues such as trespassing and harassment of livestock are becoming increasingly common.
- Need to direct certain forms of agriculture away from high quality soils (e.g., commercial greenhouses, vertical agriculture, agri-processing, indoor cannabis).
- Must discourage subdivision of large tracts of agricultural land.
- Idle farmland and rural-residential land should be incentivized to farm their lands or penalized for not farming.
- Transportation planning must accommodate the movement of farm vehicles.
- Divert agricultural plastics and promote plastic recycling from farms.
- Provide cost-effective alternatives to burning vegetative debris (e.g., chippers).
- CVRD should partner with other jurisdictions to address livestock evacuation planning.
- Ensure that solutions to challenges do not result in policies or regulations that restrict farmers as an unintended consequence.
- Include the CVFI in conversations and work being conducted that interfaces with agriculture – for example the Greenhouse Gas Emissions Inventory and subsequent mitigation efforts – the agricultural sector did not feel included in this discussion.

### Theme 2: Economy and Business

- There is a gap and need for Agricultural Economic Development in the Comox Valley, particularly since the dissolution of the CV Economic Development Society.
- Need to craft and send the message that there are agricultural opportunities that can be developed and explored in the CVRD.
- Need to look outside the valley for markets (including exports) if it can bring job opportunities and positive economic impact to the valley, including “anchor” businesses such as quota-holders.
- Need to attract/create processing and storage infrastructure.
- Support agricultural education and work with educational institutions.
- The CVRD should promote, advertise, and market “Buy Comox Valley”.
- Encourage a comprehensive business case for a local agri-plex (e.g., Stonehenge property or another location). Like an aquatic centre or community centre, this could be focussed on food and

agriculture rather than recreation. This could serve as permanent home for the farmers market and the food hub.

- The Comox Valley Exhibition Grounds should not be under the management of the Comox Valley Recreation Commission because agriculture is not within their mandate.
- Support the existing Class A government inspected meat processing facility and recognize how lucky the Comox Valley is to have one.
- Lack of overall local economic agriculture data makes it hard for decision-makers. Need a Comox Valley economic agriculture industry study so that many questions could be answered.
- CVRD to advocate to the province regarding affordable farm insurance.
- CVRD to advocate to BC Assessment to raise the farm income thresholds required to achieve farm tax status – these levels have not been changed since 1993 and would encourage greater production of farmland.
- CVRD to advocate to BC Ferries for reduced rates for agricultural users of the ferry system.

### Theme 3: Social, CVRD, and Government

- The agriculture plan should be re-visited regularly (not only every 20 years) on a schedule so that staff have a good understanding of it and implementation is fluid.
- Urban, non-farmer voice can be very loud and can have a detrimental impact on the agricultural community. Rural vote and agricultural voices feel limited due to the way that the government system is set up. City solutions to rural situations don't always make sense nor are practical.
- The CVRD must be accountable, transparent, and define how it values and weighs feedback and input received for the Agricultural Plan.
- The Agricultural Plan should encompass farms throughout the entire Comox Valley.
- Provide regular agricultural briefings, tours for elected officials and staff so that a better understanding of agricultural issues are available for decision-making. The CVFI can partner to host tours.
- Agricultural stakeholders should be compensated for participating in committees and advisory boards.
- We must all place value on all types of agriculture and encourage growth in all ways possible.
- There are opportunities to better celebrate agriculture (e.g., something similar to the Seafood Festival), could better support the CV Exhibition Society, and ensure that the agri-plex could help serve this purpose.

### **Comox Valley Farmers Market Association**

- We need more data and understanding regarding both current and future agricultural water needs. Would like to do a watershed analysis of both above ground and below ground water availability.
- Need to create a water reserve so that the ecological, agricultural, and residential needs are met.
- Need riparian enhancement along the Tsolum River and Portuguese Creek.
- Need a watershed service to help coordinate all the water-related activities.



- Support is needed to identify new market opportunities and provide training.
- An economic benefits study for the Farmers Market will be completed in summary of 2023.
- Need to support the farmers market better – it retails over \$1 million of products and serves as an incubator site for new food businesses. Rent reduction would help – very few markets across the Island need to pay rent.
- Move ahead with the food hub with LUSH as the food hub leader, need to move along so that funding opportunities are not lost.
- The CVRD website should feature the agri-food sector.
- CVRD should support the Young Agrarians program.
- The Exhibition grounds could be used for more agricultural education and training.
- The old compost education centre may be a useful venue for livestock/animal education.
- At least 40% of local government food procurement should come from local sources.

#### **Comox Valley Food Policy Council**

- Provide a full time Agricultural Coordinator position and create a Food and Agriculture Service under the CVRD.
- Consider including municipalities in the Agricultural Coordinator position job description to increase ongoing funding and allow for a more fulsome decision-making process.
- Agricultural Coordinator could support advocacy and build relationships with other levels of government and First Nations.
- Develop a plan for water issues – water should be the focus of the Agricultural Plan.
- Support and subsidize more on-farm water storage (cisterns, dug-outs, other).
- Create a water board to oversee water governance regionally.
- Ensure beneficial management practices are encouraged and incentives to build soil health.
- Explore incentives for local agriculture including lowering insurance costs, pay farmers for protecting ecosystem services, and encourage farms to be more prepared and resilient in the face of climate change.
- Provide support for new entrants including programs that provide support for access to land and housing.
- Collect more local data around what crops grow best in the valley based on water and soil, what gaps exist in the market, and develop promotional materials for crop viability.
- Link to food assets in neighbouring communities to increase the region's cold and dry food storage and support indoors farmers markets and food processing assets.
- Look at how local food economy can support the region in cases of emergency where highways, airports, or seaports may be affected.
- Develop a regional Food Security Plan and/or see food security planning as a major component of the Poverty Reduction Strategy.
- Ensure the Agricultural Plan has a strong implementation or action plan to outline how the goals will be achieved.

## Summary of Input from Additional Written Submissions from Five Individuals

### Topic: Environment and Agriculture

- Good to see federal and provincial funding for climate adaptation on farms – need to ensure the CVRD Agriculture Plan is aligned with that funding.
- Need a program to repurpose or recycle farm plastics.
- Farm chemicals need to be properly disposed of through collection programs. Includes veterinary medicines, herbicides, pesticides, fertilizers, lime.
- Biosolids usage require more local knowledge input, the used of biosolids should be banned on agricultural land.

### Topic: Emergency Planning and Agriculture

- We have an excellent volunteer fire department in Oyster River and now in Merville very close to our farm. With any regional emergency planning, these two fire departments would need to be part of the plan. They have done outreach to the rural and farming community and we rely on them for safe burning practices.
- During emergencies when supply chains are disrupted, the importance of local aggregation, storage, and distribution of food is highlighted.
- When local farms can continue to produce during an emergency that is built-in Community Food Security.
- Need to be sure we are supporting local farmers with preparedness and setting up local supply chains, aggregation, distribution, and storage.
- Farmers are vulnerable to extreme weather events, and we need to make sure they have access to additional infrastructure tools, knowledge about crop adaptation, how to make their farms more resilient.
- In the case of a wildfire or other emergency it would be valuable for the CVRD to establish lines of communication with other community organizations such as the Oyster River/Merville Fire Departments and the CV Farmer's Institute or Mid-Island Farmer's Institute.
- The CVRD could help landowners prepare to defend their properties initially by assisting landowners in obtaining appropriate fire-fighting equipment to have on-site to assist with an initial attack. Or have the CVRD purchase more fire-fighting equipment and have available in emergency trailers that are situated around the Regional District at the Fire Halls.
- The CVRD could help farmers/landowners identify escape routes across the region and assist with locating buddy farms to take evacuated livestock.
- It will be important to identify the numbers of livestock trailers available to move livestock and create a map showing access routes through rural properties or farms.

- The CVRD could develop a survey asking landowners to identify those farms/landowners prepared to act as buddy farms and take some displaced livestock whether it be cows, horses or smaller animals.
- CVRD can organize 1-day workshops where farmers/landowners can start putting together an emergency plan for their farms. Provide either printed or digital maps of individual farm properties that farmers can use to create their plans. Encourage the development of templates that farmers can just fill out instead of having to develop the plan from scratch. This is something an Agricultural advisor within the CVRD could assist with.

#### Topic: Agri-Food System Infrastructure and Economic Development

- Ensure activities at the Exhibition Grounds support agriculture. Could have more food production there, expand the School Garden and get more land into production.
- Agri-tourism is an important aspect of agricultural sustainability and education but can also be taken advantage of (e.g., building a campground without permits).
- CVRD could put public lands into a land trust for the specific purpose of being an incubator for new farmers and provide a serviced camping area for farm workers. This would support new farmers.
- Need a better understanding of food flows – what is coming in and what is going out.
- Need to know what storage assets there are in the community.
- Need better information on the actual value of agriculture to the Comox Valley – both economic and social including non-costed benefits.
- The island had the capability of supporting itself and need to consider the future and the ability to have more local capacity.
- Support for local processing facilities and storage (possibly a co-op model). Both are aspects of a food hub model and Emergency Preparedness.
- Transit is required to deliver workers to farms.
- Road access is needed to improve access to farms and for use of farm equipment.
- The island needs an improved rail route for bulk transport.
- Marine transportation can be improved with BC Ferries offering better rates for farmers or dedicated bulk services (barge).
- Local labour pool could address seasonal/periodic labour needs. Could coordinate transportation.
- Agri-plex is a good vision for agriculture and strong economic driver for the Valley. Can attract programs, events, be a venue for the food hub, commercial kitchen, meeting spaces, farmers market and others.
- Decrease in larger scale agriculture means less support from farm machinery business (e.g., lack of repair or supply services from Kubota).
- Encourage Ministry of Transportation to put notice of farms and farm machinery movement signs on highways.
- Machinery mechanics are lacking in the community – need a dealership for larger tractors.

- Insurance companies that are knowledgeable about farming operations are needed.
- At one time, the Food Hub seemed like an option for a commercial kitchen to produce some value-added products from beef operations, i.e., bone broth. However, cannot manage doing both farming and valued added products, especially with something like bone broth which needs to be supervised all day.

Topic: Land Use and Water Planning and Agriculture

- People who buy and develop ALR land need to be better informed about what they are allowed to do – the CVRD can provide this information.
- Small agricultural parcels are being developed primarily as residential properties and should not pose a threat to adjacent farms. For example, if developing ALR for non-farming purposes should require a setbacks and buffering in alignment with ALR/non-ALR boundaries.
- Siting of residential development on farmland should be regulated so that it is not on the most arable soils, and not close to neighbouring agricultural activities.
- Ensure that ALR rules to protect farmland are being properly applied throughout the permitting process.
- Encourage changes in how the CVRD respects the rules of the ALR when buildings are being considered and permitted, particularly residential buildings and accessory buildings.
- Refer building applications to the ALC so that they can be properly addressed and considered to protect viable soils.
- Agriculture water dugouts and water storage needs favourable regulations.
- Concern that not enough is being done to ensure that there is a sufficient water supply to grow the agricultural economy.
- Need assistance to build infrastructure to assist farmers in areas with good soils access water supplies.
- Look at building more ponds within water courses to increase areas of water supply for fish during summer months.
- Building requirements for farm housing have become ridiculous and are tied with an over-inflated insurance system.
- Put an annual charge on residential wells and encourage sufficient water supply for agricultural use.
- Limit residential development on rural lands.
- Concern is the potential for chasing of cattle by neighbor's dogs even with fencing.
- There are required setbacks from agricultural operations on ALR properties, but no such requirements exist for other rural properties. We have a legitimate farm on a larger RU-8 property that has a minimum subdivision requirement of 20 acres. There is no requirement for our neighbors to create a buffer between our farm operation and their new building, nor to submit a logging plan indicating their choice to remove all the Douglas-fir trees on their property including along our joint fence line. My concern is the potential for windthrow this winter causing damage

to our fence line. Requirements for buffers should be consistent across all rural land within the CVRD.

- The CVRD should take note of all properties with farm-status, regardless of land zoning, and extend the same buffers to all farmed lands within the CVRD. Also, to request a logging plan, especially for smaller properties adjacent to farm lands where the farm may be impacted.
- Continue to ensure larger parcels of land in the CVRD remain large, and are not subject to further subdivision, regardless of whether they are in the ALR or under other zoning,
- Smaller parcels of land contribute a significant role in agriculture in the CVRD, but it does not highlight the expense of having to lease, fence, or utilize a number of smaller parcels with different ownerships just to farm in the Comox Valley. Also, there is no security for those renting farm parcels, and the owners reap the benefits of farm status.
- A regional Water Board or stewardship service is a good idea, but the emphasis should be on supporting access to water for agricultural use, instead of focusing solely on salmon and fish habitat preservation.
- All rural (and town) residential wells should have monitoring devices on them, to encourage water conservation, and those wells should also be licensed or require a yearly fee for the water use. This will help people understand the true cost of the water.
- The importance of a regional stewardship service would be to determine in a general way the amount of water required in the future for agricultural operations in the Comox Valley, and to ensure that a significant amount of water is indeed set aside for future farming use.
- Any additional rural development for residential use in the Comox Valley should be based on water resources. Until we have a handle on how much water is actually available, we should consider restricting additional rural development until that amount is determined.
- There should be thought given to installation of “reverse” drainage systems that will retain subsurface water on-site during dry periods.
- The CVRD should be focusing on identifying “water recharge areas”, possibly through a survey, and encourage landowners to retain tree cover and leave more natural undisturbed treed areas. Some of these areas can double as “riparian areas”, which could be lightly grazed by livestock during dry periods. This should apply to ALL rural landowners in the RD, not just farmers.

#### Topic: Education and Communication

- Support for Farmer Institute conferences and field days.
- A section on the CVRD website for agriculture.
- Host an annual tour of farms for elected officials, in partnership with the Farmer Institutes.
- Update the Farmer Handbook that was created about 5 years ago.
- A map on the CVRD and 4VI websites of local farms that have farmgate sales and/or website.
- Support a vision for the Agricultural Plan where food and agriculture are at the heart of the community. That way projects that put food and farming at risk would not be approved/supported.
- Need education, supportive regulation for compost and manure.



- Host a regular meeting for all farmers to provide an updated on the Agricultural Plan implementation.
- Agriculture theory and farming course credits with North Island College, certificates in irrigation, soil health, forage production, animal health, greenhouses management.
- Need to offer trad courses and certification (e.g., butcher)
- Partnership with SD71 for more curriculum in schools about life and food, in-class visits, school farm projects, field trips.
- Many young individuals trying to farm have insufficient training or are poorly prepared for dealing with the challenges of farming.
- People who re-locate to the country don't always understand the effects their actions have on farming activities such as taking down trees that act as wind barriers, risks of subsequent windthrow with removal of trees, and damage to farm fences from downing trees. They don't seem to understand the expense incurred by putting up fences (that also keep their dogs in).
- Where public corridors skirt agricultural properties raising livestock, fencing should be erected by the CVRD along the length of the agricultural property using wildlife fencing, i.e., mesh fencing no less than 6-inch squares to prevent dogs from entering these properties, and it should be installed and paid for by the RD using public funds. Consideration should also be given to creating corridors for wildlife around these fences that they can travel through, but dogs cannot.
- There needs to be more public education with regards to the effects of off-leash dogs on farm livestock (and wildlife).
- There needs to be more public education on the value of grasslands and the role that cattle play in maintaining grasslands, and reducing risk of wildfire.

Topic: Policy, Governance, Advocacy

- Develop a procurement policy to ensure that local food is served at CVRD events.
- Support for a "Local First" policy regarding emergency planning and agriculture. The CVRD Emergency Program could work with agriculture to build relationships with farmers.
- Agriculture must be present as a voice on the CVRD, recognize different issues between urban and rural. Need to advocate and communicate to other agencies such as Ministry of Transportation, Ministry of Forests, BC Ferries.
- Local politicians need to see the bigger picture and the integration of the components.
- It was great to see the CVRD hire an Agricultural Coordinator and would like that position to be re-instated.
- Need to lobby for reduced water fees for agricultural use by encouraging annual payment fees for homeowners.
- The availability for funding grants is over-subscribed and short-term by design. Not enough time to submit funding applications at a moment's notice.

- Maintenance of forage/grasslands and/or forested lands which act as a carbon “sink” should be encouraged for all rural landowners.
- An Agricultural service might be valuable for the CVRD, as long as that individual has agricultural experience.
- Most of the work in the Comox Valley around water sources has historically revolved around preservation of “fish habitat” rather than looking at the aspect of water retention areas. This has caused much conflict with the farming community, which continues today with volunteers wandering across farmer’s property without permission, violating biosecurity protocols and leaving gates unsecured.
- With a focus on only fish habitat, the CVRD has created maps outlining areas of “fish presence” to “possible fish presence” in rivers and creeks with year round water flow to seasonal watercourses and even road ditches. These maps have now become the “set in stone” foundation for which any development or land use activities adjacent to these areas must be measured and assessed. However, the information on these maps should be used as a “guideline” for assessments rather than accepting their hard and fast boundaries. With the amount of rainfall and subsequent localized flooding the Comox Valley receives during the winter, it is very possible that in areas of fish presence, the fry could be washed over into road ditches where they do not normally reside. However, these ditches do not represent fish habitat that will sustain life for the long term. They have simply been transported to a habitat that is hostile to their survival. Case in point, these ditches are cleaned out when Ministry of Transportation deems necessary, and local roads receive many applications of salt/deicing agents over the winter for safe travel, which definitely goes against the requirements for fish habitat. Therefore, why are landowners and farmers required to have a “Riparian Assessment” carried out by an RPBio for a road ditch if they need to remove a tree or two? The CVRD needs to take on a more common-sense approach to “fish habitat” if they want farmers to continue to farm. They need to reduce the amount of regulations instead of increasing them.