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Minister's Advisory Committee Revitalization of ALR and ALC
C/o Ministry of Agriculture
PO Box 9120, Stn. Prov. Govt.
Victoria BC V8W 9B4

Email: ALR_ALCRevitalization@gov.bc.ca

Dear Advisory Committee Members

24 April 2018

Re: Your request for input on matters regarding the revitalization of the Agricultural Land Reserve and the Agricultural Land Commission.

The Association for Protection of Rural Metchosin (APRM) was founded to maintain the rural character of this municipality on the western side of Victoria. (Mission statement attached)

A feature of District of Metchosin is the number of small farms which contribute greatly to the rural ambience of the municipality.

The nature of the terrain, a rocky, seaside district, has restricted the ALR land to the coastal area and some of the valley bottoms. The pattern of historic settlement has resulted in the majority of ALR land being located in properties of 10 acres or less. Following are our recommendations re: revitalization, with consideration of our unique rural model.

Recommendation 1

Primarily, maintain and strengthen the protection of agricultural land in BC. Serious consideration should be given to whether the current province-wide ALR 2 Zone classifications are meeting that mandate.

Recommendation 2

The government prohibit the use of ALR land for the production of marijuana and deny the removal of topsoil and the creation of any concrete-floored green houses. The large enclosed facilities required for marijuana production should

only be located on land zoned for industrial use. Normal agricultural hemp cultivation should be allowed on ALR land.

Recommendation 3

The government, through legislation, set limits on house and farm building sizes on ALR land. This is crucially important where the ALR properties are small, as in Metchosin.

Prevent the building of “monster homes” of a size unrelated to the agricultural potential of the property. The APRM recommends that for properties of 10 acres or less the dwelling footprint be limited to 2000 sq ft and that ancillary buildings such as barns be limited to 5000 sq ft in total. ALC permission would be needed for larger coverage, and subject to the buildings being used for agricultural purposes. The ALC might also wish to identify measures to ensure that accessory buildings are indeed used for agricultural purposes.

Moreover, local governments should be encouraged to ensure that buildings, to the maximum extent possible, are located on the least fertile parts of the property so as to conserve arable land.

Recommendation 4

The APRM recommends that the legislation and regulations regarding the placement of fill on ALR lands be tightened to ensure that the agricultural potential of the land is not lost, diminished or degraded, as a result of fill. Metchosin has had problems with landowners requesting permits to place fill on their ALR land claiming this as part of their “right to farm”. In a recent local case up to 6m. of unclean fill was placed on a parcel of ALR land ruining the agricultural potential of the soil.

Recommendation 5

At present “right to farm” legislation allows farmers to ignore the riparian zone regulations set by government. The APRM recommends that this exclusion be reviewed, and preferably constrained, given the ecological values of riparian zones and the current problems existing with salmon and other fish stocks.

Recommendation 6

Removal of topsoil from ALR land should be prohibited. Topsoil can be used to augment soil in parts of the same farm.

Recommendation 7.

We strongly recommend that measures related to ownership and taxation of ALR land be reviewed with a view to ensuring that ALR lands are indeed farmed. Among the measures to be considered are: (a) prohibit foreign ownership of ALR land, (b) ensure that the beneficial owners and lessors of ALR land are public knowledge, (c) ensure that the cost value of ALR land for purposes of calculating capital gains on sale be the BC Assessed value of ALR land for agriculture. This measure would at least reduce the incentive for seeking to remove land from the ALR. (d) measures to encourage ownership of ALR lands by persons willing and able to farm it.

Recommendation 8

The APRM wholly endorses the establishment and support of co-op farming which permits the economic viability of small farms and promotes the goal of sustainability.

Recommendation 9

Review provisions for regulating (including monitoring and enforcement) of the accommodation for farm labour on ALR land, ensuring that farm labour facilities are of acceptable standard, while ensuring removal of facilities which are not used to house agricultural workers.

The APRM appreciates the opportunity to contribute to your review.

Yours truly,

Jennifer Burgis, President
Association for the Protection of Rural Metchoshin

cc:
Hon. Lana Popham, Minister of Agriculture,
Mitzi Dean, MLA, Esquimalt-Metchoshin
John Ranns, Mayor, District of Metchoshin
Chief Russ Chipps, Beecher Bay Band

APRM MISSION STATEMENT

The Association for the Protection of Rural Metchosin (APRM) is a registered non-profit society established in 1993 dedicated to preserving the quality of rural life and peaceful co-existence of homes, farmlands, diverse livelihoods, forests, natural habitats and trails in our community. Our membership includes both resident and non-resident friends of rural Metchosin. Find us on Facebook METCHOSIN APRM.

According to our Constitution, the Association shall:

- recognize Metchosin as a fragile environment that must be nurtured, protected and preserved for future generations.
- recognize that support of the public and elected representatives is essential for the protection of rural Metchosin.
- foster open communication with elected representatives, other rural groups and the public.
- encourage awareness of the consequences of growth and work to maintain low population densities in our rural community.
- recognize the uniqueness of Metchosin as a residential community and recreational greenspace and work to ensure only limited development occurs on non-agricultural rural and uplands lands.
- recognize the Agricultural Land Reserve as the core of our rural community, and support and initiate policies that preserve ALR land.