



Royal Oak Community Association

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June 24, 2019

Saanich Planning
770 Vernon Ave.
Victoria, BC
V8X 1X4

VIA: Email June 25/19

Attention: Neil Findlow, Senior Planner

Re: Referral #ALR00017 – 540 Marsett Pl.,

We are responding to the Referral dated May 2, 2019. The Royal Oak Community Association (ROCA) advises as follows:

- Approval is NOT recommended

ROCA's reasons are outlined below:

1. Land Capability for Agriculture (LCA) Assessment (e.g. Madrone Report date April 29, 2019)

- a. ROCA views the Madrone report as having been commissioned and narrowly focused on soils based capability (as opposed to agricultural capability generally) with the clear intended outcome of supporting the owner's application to exclude the land from the Agricultural Land Reserve. The report was based on limited soils analysis, did not speak directly to past activities on the land including operating as a farm as well as materials being brought in for the golf course that likely contributed to lower soils classification and limited or no substantive quantitative justification for many of the conclusions reached, and without considering agricultural uses other than just intensive soils bound agriculture (e.g. vineyards, orchards, forage crops etc.)
- b. Limited soils testing – only 5 widely spaced soils pits from 23 acres of land. Each pit could have been fully analyzed for Climatic Capability & Soil Moisture Balance but the report chooses to simply average conclusions by utilizing only Soils Pits 1 and 2 (perhaps the least capable for agriculture).

- c. Methodology - The report indicates that the analysis contained therein is based on "standard farm operations" (p. ii) which does not relate to small plot farming, community gardening or other more micro-farming applications, all of which are dramatically increasing in popularity and are essential to addressing food security in Saanich.
- d. The BC Ministry of Environment Manual, Land Capability Classification for Agriculture notes "that land in classes 1-4 inclusive are capable of sustained production of common cultivated crops". Most of the land identified by Madrone on the site falls into these classes of land and/or can be remediated to achieve the necessary higher class of land to support agriculture. Conclusions by Madrone respecting effort and viability to remediate lands as necessary are not supported by substantive or quantitative data, just opinions.
- e. Additionally, the Agricultural Land Commission itself places certain considerations on ALR land as follows, which in part runs counter to the Madrone Report:
 - i. "If the land is suitable for agricultural use (regardless of current use) it should be retained in the ALR". "The Commission considers suitability for soil bound and non-soil bound agriculture" (Note: Madrone report only addressed soil bound).
 - ii. "Economic viability is not a significant factor in determining benefit or suitability for farm use; that position would inevitably lead to the erosion of the ALR based on prevailing (changing) economic conditions" (Note: Madrone Report attempts to make a case for agriculture being non-viable on the land even though not a substantive factor to be considered.
<https://www.alc.gov.bc.ca/alc/content/applications-and-decisions/what-the-commission-considers>

2. Application to Exclude from the Agricultural Land Reserve to facilitate development

- a. ROCA reminds Saanich Planning that ROCA submitted via letter and attachment on June 14, 2018 the results of a Community Forum wherein the preponderance of comments and input received were opposed to removal of the land from the ALR. These comments remain relevant and we request that they be included in your deliberations.
- b. Saanich's own Agriculture and Food Security Plan 2018 seeks to: "manage land use to protect and support farm land"; and, "expand opportunities for urban agriculture". This current ALR land, while not presently being farmed, has the potential for future farming and should be preserved by Saanich.
- c. Notwithstanding the agricultural nature and potential of the land which should be preserved, the Applicant has chosen to omit any reference or detail respecting the intended use of the land, should the land be excluded from the ALR. Saanich policy for

development applications requires that where there are multiple permitting applications to be considered on a parcel of land (e.g. ALR exclusion, zoning, urban containment boundary changes, community planning changes etc.) these should be disclosed up front in the initial development\land application. With this information lacking, Saanich is being asked by the Applicant to support the exclusion from the ALR without knowing what development\zoning changes might be forthcoming, thus placing Saanich in the position of essentially pre-determining, in principle at least, that if exclusion is supported, development will occur and that permits will be approved, without actually knowing what that development would be. Supporting removal of land from the ALR without any information regarding the future use of the land in question cannot result in the best outcome. On this basis alone, Saanich should oppose the withdrawal of the land from the ALR due to inadequate information.

On behalf of the Royal Oak Community Association, thank you very much for the opportunity to provide input into this important decision.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Roger Graham', with a stylized, elongated shape.

Roger Graham
President - ROCA