



Agricultural Land Commission
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October 14, 2021

Reply to the attention of Shannon Lambie
ALC Planning Review: 46788
Local Government File: TC 183

Islands Trust – Islands 2050
200 – 1627 Fort Street
Victoria, BC
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DELIVERED ELECTRONICALLY

Re: Referral of Islands Trust Policy Statement - Draft Bylaw No. 183

Thank you for forwarding a draft copy of the Island Trust Policy Statement (the “Policy Statement”) for review and comment by the Agricultural Land Commission (ALC). The following comments are provided to help ensure that the Policy Statement is consistent with the purposes of the *ALC Act*, the Agricultural Land Reserve (ALR) General Regulation, the ALR Use Regulation, and any decisions of the ALC.

As per Section 15 of the Islands Trust Act, the Policy Statement guides development of local official community plans (OCPs) and regulatory bylaws throughout the Islands Trust Area. The Policy Statement has not been substantively updated in over 25 years and requires changes in order to reflect new environmental, social, and economic issues. The Trust Council is currently engaging with agencies and community groups for input, with a specific emphasis on incorporating goals related to reconciliation, climate change mitigation and affordable housing.

The Islands Trust Area is an archipelago of 13 major islands and more than 450 smaller islands situated between the mainland and southern Vancouver Island. In total, there are **10,731.9 ha of ALR** land situated within the Islands Trust area, broken down as follows:

Denman Island LTA	2392.2 ha
Gabriola Island LTA	978.6 ha
Galiano Island LTA	383.9 ha

Gambier Island LTA	303.9 ha (122.9 ha are outside Bowen / 181 ha within Bowen)
Hornby Island LTA	894.4 ha
Lasqueti Island LTA	695.5 ha
Mayne Island LTA	331 ha
North Pender Island LTA	1047.2 ha
Salt Spring Island LTA	3007.6 ha
Saturna Island LTA	404.4 ha
South Pender Island LTA	157.1 ha
Thetis Island LTA	136 ha

ALC Staff Response

ALC staff thank the Islands Trust for the opportunity to review the draft Policy Statement and provide the following comments on the relevant aspect of the draft.

Agricultural Land Stewardship Policies

Commitments of Trust Council (page 22)

4.4.1 Trust Council commits to take a precautionary approach to the stewardship of agricultural lands in the Trust Area, in cooperation with First Nations, Indigenous Knowledge Holders, other government agencies, and the public, and on the basis of the best available area-based mapping, science, social science, local knowledge, and Indigenous ways of knowing.

ALC staff response:

ALC staff suggest following edits – “Trust Council commits to take a precautionary approach to the stewardship of agricultural lands in the Trust Area, [consistent with the Agricultural Land Commission Act and its regulations for agricultural land in the ALR](#) and in cooperation with First Nations, Indigenous Knowledge Holders, other government agencies, and the public, and on the basis of the best available area-based mapping, science, social science, local knowledge, and Indigenous ways of knowing”

4.4.2 It is Trust Council's policy that agricultural activity in the Trust Area should be small-scale, sustainable, regenerative, supportive of local climate action and food security, respectful of Indigenous harvesting areas, and protective of the environmental integrity of the Trust Area. (new, 4.1.2, 4.1.3)

ALC staff response:

ALC staff note that all types of agriculture, including conventional or intensive agriculture, are permitted in the ALR as per the Farm Practices Protection Act. It may be also be advantageous to provide a definition for regenerative agriculture in the Policy Statement.

Directive Policies for Local Trust Committees and Island Municipalities (page 22)

4.4.3 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, identify and preserve appropriate areas for agricultural land to support small-scale, sustainable, regenerative agriculture, while carefully considering downstream impacts, wildlife habitat, and adjacent properties.

ALC staff comments:

ALC staff are pleased to see preserving agricultural land as a directive policy, however ALC staff note that all types of agriculture (not just regenerative agriculture) are permitted in the ALR as per the Farm Practices Protection Act. ALC staff understand that there may be agricultural lands that are outside of the ALR, and their use may be limited beyond that which is outlined in the ALC Act and its regulations. It may be helpful to identify when the Policy Statement is contemplating non-ALR agricultural land.

4.4.4 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, direct the location and construction of roads and utility corridors to minimize fragmentation of agricultural lands

ALC staff comments:

ALC staff do not object to this.

4.4.5 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, encourage sustainable farming and consider land uses and activities that support the economic viability of farms without compromising the agricultural capability of agricultural land.

ALC staff comments:

ALC staff do not object to this.

Coordination Policies for Trust Council (page 22)

4.4.6 Trust Council shall coordinate with, and advocate to, the provincial government to ensure:

- *that where a road must sever agricultural land to provide access to lands beyond, the road is built to the minimum standard necessary to service that land;*
- *that farming in the Agricultural Land Reserve in the Trust Area does not adversely impact Indigenous food security and traditional harvesting practices, cultural heritage, or the environmental integrity of protected area networks in the Trust Area;*
- *that legislation, guidelines, and incentives are established to support local farmers in adopting the highest standards of environmental protection of ecosystems, wildlife habitats, and native species diversity, in accordance with the Islands Trust Object;*
- *that support is given to small-scale sustainable farmers to reduce greenhouse gas emissions emanating from agriculture and adapt to climate variability in the Trust Area;*
- *that a separate farm class to provide property tax incentives be retained;*
- *that the threshold for farm income necessary for farm class status is appropriate to the small scale of sustainable agriculture within the Trust Area; and*
- *that the total land area subject to the farm class may include land that is left uncultivated to protect environmental integrity.*

ALC staff comments:

- ALC staff do not object to most of the bullets listed under 4.4.6, however, the second bullet, *“that farming in the Agricultural Land Reserve in the Trust Area does not adversely impact Indigenous food security and traditional harvesting practices, cultural heritage, or the environmental integrity of protected area networks in the Trust Area;”* may warrant further discussion between ALC staff and Island Trust staff.

The ALC strives to provide a detailed response to all referrals affecting the ALR; however, you are advised that the lack of a specific response by the ALC to any draft provisions cannot in any way be construed as confirmation regarding the consistency of the submission with the ALCA, the Regulations, or any decisions of the Commission.

This response does not relieve the owner or occupier of the responsibility to comply with applicable Acts, regulations, bylaws of the local government, and decisions and orders of any person or body having jurisdiction over the land under an enactment.

If you have any questions about the above comments, please contact the undersigned at 236-468-2026 or by e-mail (shannon.lambie@gov.bc.ca).

Yours truly,

PROVINCIAL AGRICULTURAL LAND COMMISSION

A handwritten signature in black ink that reads "S. Lambie". The signature is written in a cursive, flowing style.

Shannon Lambie, Regional Planner

CC: Ministry of Agriculture – Attention: Reed Bailey (reed.bailey@gov.bc.ca)

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