



13821 Blackburn Avenue
White Rock BC V4B 2Z1
May 29, 2007

Agricultural Land Commission
133-4940 Canada Way
Burnaby BC V5G 4K6

Via email: Jennifer.Carson@gov.bc.ca

Attention: Jennifer Carson, South Coast Panel Planner

Dear Sirs and Mesdames:

On behalf of the Fraser Valley Conservation Coalition (FVCC), I write to oppose all current ALR subdivision and exclusion applications from Langley Township, including:

**1. Application of Raymond and Elaine Halvorson
753 & 693 - 264 Street**

Legal Description:
N1/2 of the N1/2 of the NE1/4, Except: Firstly:
Parcel "A" (Explanatory Plan 10740) and
Secondly: Part Subdivided by Plan 55705,
Section 1, Township 10, New Westminster District;
PID#013-274-091
and
Lot 3, Section 1, Township 10, Plan 7472 New
Westminster District
PID#011-232-773

FVCC asserts that the Township of Langley erred in its conclusion that "the proposed lot line adjustment is supported on the basis it facilitates the more efficient use of agricultural land without the creation of additional lots." While the proposed line adjustment (transforming a 6.7 ha (16.5 acre) lot and .28 ha (.70 acre) lot into a 2.18 ha and 4.80 ha (11.87 acre) parcels, agricultural efficiency has nothing to do with the motivation or the end result. This property is not in an area recommended by the Commission as suitable for country "estates". The minimum parcel size for this area is 8.0 ha (19.76 acres) and the two properties should be reunited if there is to be any adjustments to boundaries.

**2. Application of David and James Poppy
24849 and 24897 Fraser Highway and 3834-248 Street**

Legal Description:
North West Quarter, Section 26, Township 10, together with Parcel "35" Statutory Right of Way Plan 4778, New Westminster District Plan Except:
Firstly; North 60 acres; Secondly; Parcel "A"
(Reference Plan 6203); Thirdly: Part subdivided by Plan 3954; Fourthly: Part subdivided by Plan 53026; Fifthly; Part dedicated road on Plan LMP2660

PID# 011-762-985

Location: 24849 – Fraser Highway
24897 – Fraser Highway
3834 – 248th Street

Area: 34.83 ha (86.06 acres)

Hopington Aquifer: Over the Hopington Aquifer Area

FVCC opposes both subdivision and Homesite Severance Subdivision applications on this heritage farm property. While recognizing that the roadway dissects the parcel, it is entirely possible – indeed many farms – function with roads going through them. Although a large portion of this farm is currently zoned and functioning as a golf course, keeping the properties together allows for the potential operation as a single farm when British Columbia hits its impending critical shortage of farmland. If the property were subdivided, the properties would be separately owned and any subsequent ownership of the larger parcel would undoubtedly require construction of living accommodation, etc. resulting in net loss of productive land.

FVCC points out that this property has two environmentally sensitive area designations and therefore should be preserved in as large an intact parcel of wildlife/fisheries habitat as possible.

The subject land can be traced back to one of Langley's pioneer farm families and the heritage values of this land also beg that it be retained as one parcel.

3. Application of 662834 BC Ltd. (Arvind Nair)

4878-224 Street

Legal Description:

Parcel "D" (L846968) of Parcel "C" (Plan with charge deposited 33858C) South West Quarter Section 5 Township 11 New Westminster District
PID: 013-254-770

FVCC opposes this exclusion application on the basis that the Murrayville Community Plan does not comply with the Agricultural Land Reserve, and that the proposed road realignment and stormwater pond are either not necessary or can be moved to adjacent developed property.

The property owner has attempted to exclude the entire 76.21 acres of land from the ALR, and is now proposing to exclude 1.47 acres when the Township's own report indicates that only .24 acres are required for non-farm use.

Stormwater retention ponds and road realignments can be put on any land. The same cannot be said of food production. This foodland parcel must remain intact.

FVCC points out that this property has an environmentally sensitive areas designation (Upland Murray and Anderson Creek areas) and as such, the wildlife/fisheries habitats should be protected from further development and remain intact, as well.

4. Application of Jacob & Elsie Dyck

24024-61 Avenue, Langley

Legal Description:

Lot C, Except: Parcel "E" (Explanatory Plan 22790)
Section 10, Township 11, New Westminster District

Plan 2691
PID#010-683-127

FVCC strongly opposes subdivision of this 1.213 ha (3.0 acre) parcel into two: one .404 ha (1.0 acre) and 0.808 ha (2.0 acre) parcels. It is not necessary for the property to be legally divided in order for the Dyck's children to "farm" the land. The objective of this subdivision is clearly to create two country estates.

Langley Township's Suburban Residential Zoning of this land does not comply with the objectives of the Agricultural Land Reserve.

FVCC points out that this property, on the Salmon River Uplands and over the Hopington Aquifer, has the highest environmentally sensitive rating (#1) and retention of the property size is in the interests of protecting wildlife/fisheries habitat. Subdivision of the land – and the inevitable increased development – is contrary to the fisheries/wildlife habitat interests.

**5. Application of Jacob Dyck
6036-240 Avenue, Langley**

Legal Description:

Lot "A", Section 10, Township 11, New
Westminster District Plan 2691
PID#010-683-101

FVCC strongly opposes subdivision of this 2.63 ha (6.5 acre) parcel of land into a 0.607 ha (1.5 acre) and 2.023 ha (5 acre) parcels for suburban development.

Township's suburban residential zoning of this land is inconsistent with the objectives of the Agricultural Land Reserve and the Commission must not reward the Township for unsustainable agricultural planning.

FVCC points out that this property, on the Salmon River Uplands and over the Hopington Aquifer, has the highest environmentally sensitive rating (#1) and retention of the property size is in the interests of protecting wildlife/fisheries habitat. Subdivision of the land – and the inevitable increased development – is contrary to the fisheries/wildlife habitat interests.

**6. Application of Abe and Margaret Schroeder
24408-50 Avenue, Langley**

Legal Description:

Lot 18, Section 13, Township 11,
New Westminster District Plan 37197
PID#007-530-11

FVCC strongly opposes this homesite severance application to subdivide this 5.36 ha (13.26 ha) parcel into a 0.4047 ha (1.0 acre) and 4.96 ha (12.36 acre) parcels to separate the family home from the Christmas Tree Farm.

The agricultural potential of this land is not well served by this subdivision, and it very much appears that the objective is to create separate dwellings on each piece of property, thus diminishing the agricultural productivity of the overall parcel.

The time will soon be upon when British Columbia will need to look to this land for food production rather than Christmas trees, and preserving as much overall area as possible for food production is the intelligent choice.

FVCC points out that this land has an environmentally sensitive area designation (Salmon River Uplands) and as such, keeping the parcel (and relative wildlife/fisheries habitats) as large as possible is in the best interests of biodiversity.

Hopington Aquifer

Several of the above properties have one or more environmentally sensitive area designation and are located over the Hopington Aquifer. Although Township policies with regards the Hopington Aquifer are likely not within the Commission's purview, it is of great concern that the Township is allowing subdivisions above the aquifer. In this regard we refer you to an editorial by Langley Times' editor, Frank Bucholtz <http://www.itstheexperience.ca/ViewBlog/296/> . Two weeks ago at a BC Water and Waste Association Conference <http://www.bcwwa.org/AGM/documents/BCWWA2007BookofAbstracts.pdf> , Trudy Naugler, MSc student, Institute for Resources, Environment and Sustainability, UBC and Dr Hans Schreier, Professor, Institute for Resources, Environment and Sustainability at UBC described the Hopington aquifer as "the most vulnerable aquifer in the Lower Fraser Valley (LFV)."

Because the Township's own practices contravene its October 16, 1995 moratorium on all subdivision and other development applications to increase residential density in the Salmon River Uplands area lying over the Hopington Aquifer, the ALC need not support this contravention.

General

Subdivision of land within the Agricultural Land Reserve is seemingly innocuous because the land remains within the boundaries of the ALR. However, FVCC maintains that subdivision of farmland is rarely in the best interests of agriculture and therefore as a general rule we oppose such applications. Further, it is our belief that during the past thirty-four years any mistakes to ALR have been corrected and that the lands currently within its boundaries are of sufficient agricultural capability to warrant inclusion and must be vigilantly protected.

British Columbia already has the most fractured farmland in this country. Subdivision of land almost always results in additional buildings, fencing, roadways – all of which mean an accumulative net loss of food production capacity for the land.

Figures on the total amount of agricultural land in the Fraser Valley are highly misleading. They fail to communicate that almost 30% of this region's ALR land is currently under roads and highways, and a significant additional amount is under buildings (homes and barns) and fencing. As well, subdivision often precedes exclusion

application and exclusion applications on smaller parcels of land are less inclined to draw public attention and opposition.

Small parcels of farmland are not always able to accommodate large pieces of farming equipment required to produce certain crops. Keeping farmland in the largest possible parcels allows the agricultural uses of the land to be adapted to changing markets, which is increasingly important in potentially changing growing conditions of a warming planet.

Currently BC's farmland is producing only 48% of the food we need to feed our population; a population that is expected to grow dramatically within the next two decades. The BC Ministry of Agriculture's ***B.C.'s Food Self-Reliance Report*** (attached) paints a grim picture:

To produce a healthy diet for the projected B.C. population in 2025, farmers will need to have 2.78 million hectares in production of which 281,000 will need access to irrigation. This means that to produce a healthy diet for British Columbians in 2025, given existing production technology, the farmland with access to irrigation will need to increase by 92,000 hectares or 49% over 2005 levels.

To maintain the current level of self-reliance through to the year 2025, farmers will need to increase production by 30% over 2001 levels. The increased production will be concentrated on the land that has access to irrigation – land that is typically near the urban centers.

Harold Steves, the driving force behind the establishment of an agricultural land reserve in British Columbia, recently coined the term "peak food" to illustrate that the coming food security crisis is at least as concerning as "peak oil".

Canada cannot continue to depend on our American cousins for food. In October 2006 the *Wall Street Journal* declared that the USA had become a net importer of food. While this is in part a product of changing world food markets, it is also the result of the US having paved over its own farmland at a rate of 400,000 acres per year for the past three decades. As well, in this age of peak oil and warming planet, farmland is under increasing competition to produce crops for biofuels.

In addition to physical access to food, changing energy prices in a post 'peak oil' world will affect the ability of British Columbia families to afford to buy imported food. Protecting our foodlands to keep food production local will help ensure that future generations of BC citizens have economic, as well as physical access, to food.

British Columbians will face a food security crisis within the next 25 years; an avoidable product of our failure to protect the farmland we set aside in 1973 to protect ourselves against just such a situation.

With almost fifty (50%) of the GVRD's farms, Langley is positioned to play a very important role in both the region's and province's future food security. In order to do this, Langley must protect its farmland.

Given all that we now know, we are morally obligated to future generations to protect the foodlands within the Agricultural Land Reserve. Exclusions and subdivisions must become the rare exceptions, permitted only where absolutely necessary. The Fraser Valley Conservation Coalition sees no evidence of necessity to subdivide any of the above-referenced properties. As such, we ask the Commission to uphold its mandate of preserving our farmland by rejecting these applications.

Respectfully submitted,

Donna Passmore
Agriculture Campaigner
Fraser Valley Conservation Coalition

copy: Mayor and Council, Langley Township
Hon. Pat Bell, MLA, Minister of Agriculture
Corky Evans, MLA, NDP Agriculture Critic