



April 26, 2021

Local Government File: AR100035-9950
ALC Application ID: 62493

ATTN: Melissa Nitz, Planner 1
City of Prince George
1100 Patricia Blvd., Prince George, BC, Canada V2L 3V9

VIA EMAIL: Melissa.Nitz@princegeorge.ca

Re: ALC subdivision application referral – 9950 North Kelly Road

Dear Melissa Nitz:

Thank you for providing the B.C. Ministry of Agriculture, Food and Fisheries with the opportunity to comment on the proposed Agricultural Land Commission (ALC) application to subdivide a parcel into four portions within the Agricultural Land Reserve (ALR) for reasons of family estrangement. Ministry staff have reviewed and provide the following comments:

- The Agricultural Land Reserve (ALR) is a provincial zone in which agriculture is recognized as the priority use. Farming is encouraged and non-agricultural uses are restricted. Ministry staff note that there is currently no agricultural activity taking place on the parcel and no proposed agricultural business planning identified as part of this application.
- The application does not appear to indicate in sufficient detail whether the proposed subdivision will afford any benefit to agriculture, either in the short or long term. The provided rationale for how the proposed subdivision will support agriculture (that the climate is unsuitable, and the land only grows hay) is not a justifiable measure for subdivision. The ability for each parcel to access the road and easily connect to power on-site are also not a rationale for subdivision suitability in the ALR.
- Ministry staff further note that the proposed 16-hectare parcels may result in reduced options for economically viable agricultural production (particularly of forage crops) as a result of their smaller size. Subdivision and the creation of smaller lots can erode long term agricultural and economic potential of property parcels and increase land cost per acre, which can limit farm business opportunities. In some circumstances, it has been shown to increase conflict between adjacent land uses.

.../2

- The subject parcel is located in an area of mixed Agricultural Capability Classes; 80 percent 4M and 20 percent 5TM, with some limitations due to moisture and topography. The soils are a combination 80 percent Eena (rapidly drained loam) and the productive and desirable Pineview soils. As such, they are considered appropriate for the agricultural production of forage, some grains and pasture. Aerial/satellite images show agricultural development in the area with these same soils and capability classes indicating the viability of production in these soil/climate conditions. It is important to note that capability subclasses do not preclude agricultural production but provide insight into management considerations in terms of practices used, crop selection and other factors. Areas within the ALR in addition, can be suitable for non-soil based agriculture.
- Ministry staff are available to discuss viable agricultural opportunities with the landowners considering pursuing farming activities on ALR land. For more information on [B.C.'s Land Matching Program](#), please visit the [Agrarians Foundation](#) organization website.
- If approved, it is strongly encouraged that lawful fences are established for all resulting parcels. This is an important step in agricultural areas and can be a key step in protecting both parcels and any owners/future owners from legal issues such as livestock being at large and reduces the potential for complaints and conflict. For more information on fencing requirements in rural areas please refer to Section 3 of the *Trespass Act* www.bclaws.ca/civix/document/id/complete/statreg/96462_01
- If the subdivision is approved, the resulting parcels would remain in the ALR and continue to be subject to all pertinent regulations and policies. Any access points and structures that could be established should be sited to minimize the impact on the most arable/productive areas and/or areas required for farming operations.

If you have any questions or concerns about our comments, please do not hesitate to contact us.

Sincerely,

Gregory Bartle
Land Use Planner
B.C. Ministry of Agriculture, Food and
Fisheries
Phone: (778) 974-3836
Email: Gregory.Bartle@gov.bc.ca

Karen Tabe
Regional Agrologist – Vanderhoof
B.C. Ministry of Agriculture, Food and
Fisheries
Phone: (236) 409-2004
Email: Karen.Tabe@gov.bc.ca

Email copy: ALC Land Use Planner (North), ALC.North@gov.bc.ca