

Engagement Summary Report

Comox Valley Regional District Agricultural Plan Update



OCTOBER 2024

PREPARED BY



IN ASSOCIATION WITH



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Acronyms

AF	Ministry of Agriculture and Food
ALC	Agricultural Land Commission
ALR	Agricultural Land Reserve
BC	British Columbia
CVAP	Comox Valley Agriculture Plan
CVEX	Comox Valley Exhibition
CVFPC	Comox Valley Food Policy Council
CVFI	Comox Valley Farmers Institute
CVFMA	Comox Valley Farmers Market Association
CVFPC	Comox Valley Food Policy Council
CVRD	Comox Valley Regional District
MIFI	Mid-Islands Farmers Institute
YA	Young Agrarians

1.0 Introduction

This report provides the details of all engagement activities and feedback received during the development of the Comox Valley Agricultural Plan (CVAP) from November 2022 to October 2024. These engagement results, along with the research results from the other reports, inform the key themes and recommendations that are found within this Final Interim Report.

2.0 Engagement Overview

Engagement was at the core of the process to develop the CVAP. Led by the consultants and guided by CVRD staff, engagement activities took place over approximately 24 months (Fall 2022 to Fall 2024). There were three distinct rounds of engagement:

- 1) The first round developed an understanding of the challenges, and opportunities facing the sector, primarily through interviews and Project Advisory Committee Meetings, and
- 2) The second round dove deeper on the key areas of concern identified in round one, primarily through themed community workshops and online survey, focus group meetings, a webinar and written submissions.
- 3) The third round provided an opportunity for the agricultural community and the general public to provide feedback on a draft CVAP. This included meetings with key organizations, written submissions, and an online survey.

The CVAP engagement process held space for the involvement of the K'omoks First Nation and communications were led by the CVRD leadership. A consultant for K'omoks First Nation provided content regarding pre-colonial food systems within the community, which was included in the Background Report. However, to date, there has been no other direct feedback from K'omoks First Nation regarding the CVAP.

2.1 Engagement Objectives

Engagement activities were undertaken to achieve the following objectives:

- Engage the local agriculture and food sector to identifying existing food and agriculture assets, gaps, challenges, and opportunities with an overall eye of identifying directions for the CVAP.
- Engage a diverse range of producers, processors and agricultural players in terms of demographics and commodity groups, particularly those based in the CVRD's Electoral Areas.
- Provide elected officials with a clear overview of key priorities of the local agriculture and agri-food sector.

2.2 Engagement Methods

A variety of engagement methods were used to ensure meaningful feedback.

Interviews

The consultant team conducted one-on-one interviews with 29 individuals in the Fall of 2022. The majority of interviewees were farmers and ranchers. Other interviewees included representatives from local agri-food sector organizations and local and provincial governments. Interview questions focussed on the experiences of the interviewees with regards to agriculture, what key challenges or barriers exist, and what solutions or opportunities they envision for moving the sector forward. The interviews contributed to the background context of agriculture in the Comox Valley including the challenges, opportunities, and benefits of farming in the region. Furthermore, the interview process helped to

inform the establishment of the Advisory Committee, development of further engagement tactics, and inform the recommendations and actions in the final interim report.

Project Advisory Committee Meetings

An Advisory Committee (AC) was formed to assist in providing critical feedback at important steps along the project timeline. Advisory Committee positions were advertised through print media, online (social media), and via email. Interested members of the public were encouraged to complete an application and submit it to the CVRD for consideration and 13 members were selected. The AC members were mainly agricultural producers and farm operators and were selected based on their agriculture and agri-food expertise. A Terms of Reference was developed for the AC to help guide meetings. Meetings occurred in November 2022, December 2023, February 2023, October 2023, February 2024, and October 2024.

Focus Group Meetings with Local Organizations

Three online, facilitated focus group meetings were held with the leadership teams of key local agricultural organizations in April 2023:

- Comox Valley Farmers' Institute
- Mid-Island Farmers' Institute
- Comox Valley Farmers' Market Association

The meetings consisted of a review of strategic areas of influence that the CVRD can have in agricultural planning, presentation on the CVAP Interim Report, and roundtable discussions regarding priority area for each organization, including identifying challenges, opportunities, areas for further consideration, as well as validating perspectives already gleaned through engagement and review.

Themed Community Workshops and Online Survey

Four community workshops were held during May 2023 at Merville Hall. Each workshop consisted of a theme relating to the agriculture sector. The themed workshops brought farmers, processors, and other agriculture players together who may not usually have the opportunity to meet with one another. These themed workshops were based on key issues that arose during the initial rounds of engagement, including:

- Land Use Planning
- Emergency Planning and Preparedness
- Water and Agriculture
- Business Viability

In advance of the workshops, the project team met with CVRD staff to better understand what initiatives related to each theme are already underway in the CVRD, and possible topics to discuss during the workshops. In total, 35 people attended the sessions.

The questions discussed during the Themed Workshops provided both in hard copy and online for those who could not attend the workshop sessions but who wanted to contribute their feedback. A total of three (3) people provided feedback using this method. In addition, recordings of workshop presentations were posted online for those wishing to learn more about each topic.

Webinar

On June 8, 2023, an online webinar was held to provide another avenue of engagement for any members of the agri-food sector, local organizations involved in agriculture and food security and the public. The objective of this webinar was to present the feedback received during the Themed

Workshops and identify any other issues not captured by the workshops that are important for the local agriculture and food sector. Eight (8) people attended this webinar.

Agricultural Planning Commission

A presentation of the draft CVAP was presented to the CVRD’s Agricultural Planning Commission in June 2024.

Written Submissions

Throughout the project’s process, there was ongoing opportunity for anyone to submit written comments to the consultants or CVRD staff about the challenges and opportunities for CVRD to support the local agriculture sector. A total of seven (7) written submissions were received.

2.3 Profile of Engagement Participants

The engagement methods reached many individuals within the local agriculture and agri-food sector in the Comox Valley. Almost three quarters (72%) of people who provided input were agricultural producers (farmers and ranchers), many of whom are also involved in processing their products. Farms of all sizes, ranging from less than an acre to hundreds of acres, were engaged and provided input. The farms represented the wide diversity of agricultural activities occurring in the Comox Valley and included cattle ranches, dairy farms, poultry farms, flower, fruit, and vegetable farms, mixed vegetable and livestock farms, nurseries, hay and grain farming, and wineries. Other types of stakeholders engaged included the public, and the following local agriculture and food organizations and government representatives:

- Comox Valley Farmers’ Institute
- Mid-Island Farmers’ Institute
- Comox Valley Farmers’ Market Association
- Comox Valley Food Policy Council
- LUSH Valley
- School Meal Programs & Farm to School
- Vancouver Island University Seafood Innovation Centre
- Island Health
- Elected officials from CVRD and the City of Courtenay, Council
- CVRD staff
- Ministry of Agriculture and Food staff

The following is the breakdown of stakeholder category who were engaged and participated in the process:

- Producers and/or Processors: 72%
- Local government council, staff or provincial staff: 12%
- Local organizations: 10%
- General public: 6%

Many people who engaged in the process are often involved in numerous capacities within the sector. For example, farmers and ranchers also may be members of local organizations and farmers’ institutions. Some individuals also attended multiple engagement events.

The following table provides a further breakdown by engagement activity of the stakeholder category:

Engagement Activity	Category of Stakeholder	Percentage
Interviews:	Producer and/or Processor (21)	73%

29 participants	Local Organizations (5)	17%
	Local/Provincial Government (3)	10%
Project Advisory Committee: 13 participants (6 meetings)	Producer and/or Processor (12)	92%
	Local/Provincial Government (1)	8%
Focus Group Meetings: 18 participants	Producer and/or Processor (18)	100%
Themed Workshops: 35 participants	Producer and/or Processor (20)	57%
	Local/Provincial Government (8)	23%
	Local Organizations (4)	11%
	General Public (3)	9%
Organization Meetings: 42 participants (CVFI, MIFI, CVFMA)	Producer and/or Processor (33)	79%
	General Public (9)	21%
Written / Email / Online Submissions 15 participants	Producer and/or Processor (7)	33%
	Local Organizations (8)	34%
	General Public (7)	33%
Webinar: 8 participants	Producer and/or Processor (3)	38%
	General Public (3)	38%
	Local Organizations (1)	12%
	Provincial Government (1)	12%

3.0 Engagement Results

This section provides a summary of the feedback collected during each engagement activity.

3.1 Round 1 Engagement Results

Round 1 of engagement took place in late 2022 and sought to engage with the agriculture sector to understand the current situation for the agriculture sector in Comox Valley, including the challenges and opportunities facing the sector. Engagement with the agriculture sector included 29 stakeholder interviews and 3 Project Advisory Committee Meetings, which revealed key themes as described below. Round 1 engagement also included staff meetings to review the 2002 CVAP.

Passionate Agricultural Community

The Comox Valley has a strong agricultural community, holding generations of invaluable knowledge. Interviewees noted that one of Comox Valley's greatest strengths is a long and rich history of agricultural production, with generations of knowledge and experience in farming, foraging and harvesting in the region's climate and landscapes. Within Comox Valley there are two Farmers Institutes. These organizations sometimes present divergent perspectives on topics of interest. However, holding space for diversity while encouraging collaborative efforts provides better outcomes on issues that impact the wider agricultural community. Early feedback also pointed to a disconnect between local governments' understanding of agriculture and the realities on the ground. The new support role of the CVRD Agricultural Coordinator provides hope that these disconnects will be minimized over time. Engaging producers and leaning more into the expertise of the AAC could improve the capacity for the region to support agriculture.

Market Diversity Leads to Sector Strength

Producers based in the Comox Valley sell their products to a wide diversity of markets, from the farm-gate to international customers. The route to market is dictated by many economic drivers and indicators including commodity type, processing availability, storage capacity, transportation and distribution options, and customer base. This market diversity builds resiliency into the sector such that if one market fails or is in flux, the entire sector is not made vulnerable. A strong sector leads to improved agricultural supports and services, as well as access to agri-food resources such as seed supply, feed mills, and processing facilities. However, it was also noted from interviewees that the amount of food being produced in the valley has been on a decline over the past 100 years. Interview findings pointed to rising costs of land, transportation, and inputs such as equipment, seeds, fertilizers, packaging, and feed as one of the core struggles at making farming profitable. In addition to this, lack of processing facilities for meat, dairy and vegetables, all threatened the long-term sustainability of the industry and the region's self-sufficiency. Many producers noted that slaughter and butcher capacity of the Valley was insufficient. With the only red meat abattoir maintaining a wait list of up to 1-year, many producers choose to send animals off island for slaughter and therefore those end products are not necessarily available to residents. Small scale producers pointed to a lagging timeline for the food-hub development.

Climate Change and Water Management are Key Concerns

The Comox Valley is experiencing the impacts of climate change through changing hydrological systems. Water management is one of the key issues in Comox Valley, producers note the changing hydrological systems are compromising water availability in the summer and creating drainage issues in the spring which are threatening the viability of the farming sector. Producers stated that there is a need for further support on developing dugouts, in the way of accessible information about where funding can be found, and regulatory advocacy. Many producers also noted a sense that the government and general population perceives members of the agriculture sector as being water wasters, rather than

water stewards. Producers noted that there is a need to balance the needs of urban and rural water users, as well as provide information and messaging around agricultural water use during times of drought.

Farmland Protection is Critical

The Comox Valley is a highly desirable place to live, and thus experiences the pressure of urbanization of agricultural land. Many producers pointed to concerns regarding potential shifting of urban boundaries and subdivision of ALR land (or small minimum lot sizes) which often leads to the creation of rural estates rather than small farms. It was also noted that increasing prices of farmland is reducing affordability for farmers to expand their operations or for new entrants to begin financially viable operations. Additionally, many interviewees cited a lack of enforcement on ALR infringements as a contributor to loss of farmland and suggested the CVRD could play a role in enforcement of these infringements.

New Entrants are needed to Ensure Sustainability

While the Comox Valley has a rich and long history of agriculture, food production and food harvesting, new entrants into the industry often find it difficult or impossible to build a profitable farm, with many new farmers in the region leaving agriculture within the first five years, leading to a somewhat transient local agricultural community. New farmers are often relying on grant programs and bank loans, which are unsustainable and frequently result in the need to close the farm.

3.2 Round 2 Engagement Results

Round 2 of engagement took place from January to June 2023 and sought to collect feedback from on the draft interim report and dive deeper on the key theme areas identified during Round 1 of engagement. Round 2 consisted of focus group meetings with agricultural organizations, CVRD staff meetings, in-person community workshops and online survey, a webinar and written submissions.

3.2.1 Focus Group Meetings with Local Organizations (April 2023)

Organization	Priority Areas and Issues of Concern
Comox Valley Farmers Market Association	<ul style="list-style-type: none"> • Would like to expand number of farmers markets in the region. • Prioritize finding a permanent home for the farmers market. • Will develop a strategic plan for the CVFMA.
Comox Valley Farmers Institute	<ul style="list-style-type: none"> • Would like to increase agri-food education opportunities for the community and elected officials. • Must ensure that the role of agriculture in relation to climate change is better understood by local government. • Would like to secure a permanent location for the farmers market.
Mid-Island Farmers Institute	<ul style="list-style-type: none"> • Plans to continue to host an annual agriculture conference, and to facilitate regional farm tours. • Would like to find solutions to insurance challenges for producers. • Will continue to participate in the Food Hub Stewardship Group.

Focus Group Meetings: 18 stakeholders	Producer and/or Processor (18)	100%
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Results from these three focus group meetings resulted in the following themes:

There is the need and opportunity to increase productivity of agricultural land.

Addressing the challenge of accessing land for farming and the utilization of agricultural land for farming is a significant priority. Ensuring the viability of small-scale farming and supporting new and young farmers is crucial in the context of numerous farmers having relatively small plots of land, such as 5 acres and under. Efforts should be made to encourage and facilitate the utilization of these small parcels for agricultural purposes. To discourage non-farming buyers, there is a need to impose higher taxes on idle farmland, reducing its appeal. Additionally, it is important to divert non-land based production, such as greenhouse cultivation and cannabis farming, away from prime agricultural land and instead direct it towards non-agricultural or less fertile areas. Rather than imposing restrictions, a more effective approach would involve zoning specific land for these purposes.

Development of infrastructure to support agriculture and related businesses is essential for fostering growth and sustainability.

Some specific needs and opportunities could include the establishment of shared freezer facilities for meat producers, accessible commercial kitchen spaces for vendors with irregular usage requirements, and shared on-farm equipment. Furthermore, promoting interconnection between food producers and processors can encourage the use of local products by food processors. Introducing a local food branding initiative, such as a "Buy CV" sticker, would help consumers easily identify and support local food. Addressing the scarcity of abattoirs is crucial, and the CVRD could play a role in reducing unnecessary regulations and streamlining licensing processes for these facilities. Improving the farmers' market experience is another priority, including the establishment of a permanent location and ensuring public transit accessibility for better food security. Farmers' markets also serve as business incubators, supporting the growth of farmers and fostering entrepreneurship. Lastly, expanding the number of markets in the region would create more opportunities for local producers and enhance food access for the community. The agriplex/exhibition grounds could be a great asset and more work is required with the agricultural sector and CVRD to determine potential opportunities for this infrastructure to support the agriculture sector.

Water access and availability is a persistent challenge for producers and needs to be addressed from a land use planning perspective.

Obtaining provincial water licenses from the province is bottle-necked, but the CVRD can advocate for faster processing. Climate change is affecting crop growth and water availability, highlighting the urgent need for water storage at both farm and regional levels. On-farm water storage benefits the entire community, including fish habitats, and farmers should be compensated for their efforts. Creating dugouts can lead to confusing overlap with the Water Sustainability Act if groundwater levels rise during the wet season and interact with the water in the dugout. Increasing access to irrigation options for new farmers and improving irrigation systems and districts, such as the potential Wolf Lake water storage project, is crucial. Consistency in watercourse regulation by provincial government departments, including considerations for fish habitat, ditch cleaning, and riparian areas, is also needed. Forestry practices need stricter government oversight to prevent denuded hills and insufficiently bordered creeks, which lead to excessive flows and flooding.

Urban/rural conflicts create challenges for producers and are intensifying with increased development near the agricultural edge.

Implementing edge planning and management strategies could help mitigate conflicts between urban and rural areas. Unresolved issues arise when people fail to close gates on trails, leading to livestock escaping, and farmers are unfairly charged for negligence; for example, dog bylaws are applied in towns, yet farmers bear the brunt of conflicts with livestock due to tourists or recreationalists and off-leash dogs, or gates being left open. There is a lack of consideration for farm vehicles in road use

decisions, such as the inclusion of bicycle lanes, and often drivers do not respect slow moving farm equipment on roads. It is essential to make it mandatory for any development to take agricultural considerations into account, to reduce conflicts between urban and rural areas.

Leading and supporting education and awareness for agricultural and related businesses as well as the public is a key role for the CVRD.

Increasing awareness of the agriculture sector among the public, CVRD staff, and elected officials is necessary. Supporting Farmers Institutes in organizing farm tours and encouraging the participation of elected officials in these events is important. CVRD should do what they can to ensure the Comox Valley Annual Exhibition event happens each year and agricultural is prominently included in the event. To provide information and resources, the CVRD should have an agricultural webpage on their website. This webpage could include resources such as the Farmer Handbook, agricultural bylaws for individuals moving into agricultural land, information packages about living near farmland, maps of farms and farm stands, retail stores selling local foods, and information about farmers' institutes. It is crucial to emphasize that the region is an active agricultural landscape. Additionally, prioritizing local food procurement in public buildings, schools, CVRD facilities, and other institutions can promote and support the local agricultural industry.

Improving CVRD communications and engagement with producers would help to build a shared understanding of what is needed and how to work together towards common goals.

Improving communication between the CVRD and the agriculture sector is crucial. The CVRD is encouraged to actively participate in Farmers' Institute meetings and engage with the agricultural sector. Consistent communication with Farmers' Institutes should be established, and efforts should be made to build trust over time. To foster dialogue, the CVRD could organize informal coffee meetings with staff and elected officials to discuss agricultural issues and the CVRD's initiatives in the sector. Ensuring the permanence of the Agricultural Advisory Committee is important. Moreover, compensating farmers who volunteer for committee roles should be included in project budgets. There is sometimes a lack of clear communication regarding land use permits on farms. For example, farmers who proactively communicate their plans to the CVRD have encountered challenges when staff members struggle to process agricultural land use requests across different departments. Creating a checklist for farmers outlining the process and necessary permits for specific activities on their lands would facilitate communication and provide clarity for both farmers and CVRD staff.

Increasing capacity for compliance and enforcement is needed in the region.

Addressing non-compliance issues on ALR lands and promoting enforcement is needed in the region and collaboration between the CVRD and the ALC is essential in this regard. Mechanisms for enforcing non-compliance and supporting farmers could be established, and the CVRD should explore how it can assist in this process. It is suggested that the CVRD create a platform for farmer complaints regarding neighbors interfering with regular farm use or non-farm use on ALR lands, providing clearer information on how to address such issues. Involving the real estate industry is another avenue, with the CVRD advocating for awareness through a memo outlining what it means to live in active farming areas. Additionally, while biosolid dumping is permitted, it is important for the CVRD to notify neighboring residents when such activities occur, given the potential risks to animals and watercourses.

Other comments from the Focus Group sessions:

- There are often divergent viewpoints within the local agriculture sector on a variety of issues.
- Many issues at the time of the 2002 CVAP are still relevant.
- The CVRD could integrate agriculture more effectively into planning decisions in the electoral areas and work with municipalities of Courtenay, Comox, and Cumberland to better understand the important role agriculture plays in the region as well as develop short to long range policies that consider agriculture.

- The agriculture sector felt unheard during the Greenhouse Gas Emissions Inventory project and did not feel represented in terms of the benefits local agriculture and agricultural practices provides to the region.
- Waste management options for farm debris are needed. For example, on-farm burning is the most cost-effective way to manage crop waste but burning bans have effectively eliminated that option. CVRD could support chipping wastes when possible, for example, by helping to cover costs for alternative disposal methods such as wood chipper rentals.
- Would like to see Farmers Institutes included as key partners in the updated Agricultural Plan.
- The updated Plan should include a report card which is provided to stakeholders on an annual basis, so they know the progress of the plan implementation.
- The CVRD should coordinate regular meetings with all farmers for update on Plan status once created to inform about what items are being worked on, by whom and what the targets are for implementation.

3.2.2 CVRD Staff Planning Meetings (April 2023)

In preparation for the Themed Community Meetings, four staff meetings were held to understand the CVRD perspective on the key themes identified in the planning process, and to help guide the planning and execution of the upcoming meetings. Each of the four staff planning meetings aligned with one theme for the upcoming community meetings and included relevant CVRD staff members who were most knowledgeable on the subject matter. In addition to CVRD staff, representatives from the Comox Valley Emergency Program and Comox Valley Fire Department attended the meetings.

The following meetings took place:

- Planning and Development Services Department: to discuss Land Use Planning, Parks, and Climate Action and Agriculture
- Liquid and Solid Waste Management Services Department: to discuss Water Services and Waste Management Services and Agriculture
- Oyster River Fire Department, Comox Valley Emergency Program, Ministry of Agriculture and Food: to discuss Emergency Planning and Agriculture
- Economic Development Coordinator: to discuss Farm Business Viability

3.2.3 Themed Community Workshops and Online Survey (May 2023)

The following summarizes the discussions during the themed community workshops and the responses from the online survey.

Themed Workshops: 35 stakeholders	Producer and/or Processor (20)	57%
	Local/Provincial Government (8)	23%
	Local Organizations (4)	11%
	General Public (3)	9%

Theme 1: Land-Use Planning and Agriculture

There are several land use planning decisions that affect the agricultural community, such as housing and transportation (e.g., transit options). One major difficulty is the succession process when multiple families wish to continue farming, but housing and subdivisions regulations make it challenging for retiring farmers to transition their operation to adult children. Additionally, transit poses a problem for labour, particularly in rural areas where the bus schedule does not run on weekends, making it difficult for farmers to access workforce who often does not own cars. The CVRD could assist by establishing designated farmworker housing in zoning or providing alternatives like campsites with amenities. It is crucial to direct development towards existing urban areas and employing planning bylaws for edge

planning. Regulations should include buffering on the non-ALR side and adherence to CVRD Development Permit Areas (DPAs). Stronger compliance and enforcement measures are necessary on ALR land and non-ALR lands alike. There have been conflicts between trail users and farmers, which the CVRD can help mitigate through enforced on-leash bylaws, improved signage, fencing, gates, barriers, and public education regarding recreational activities near or on farmland. Increasing signage on roads to communicate agricultural vehicle usage and educating the broader community about the benefits of living in active agricultural areas are important. The CVRD should continue to protect the ALR from development and protect the preservation of fertile land outside of the ALR, including small lots which can be viable for farming.

Theme 2: Emergency Planning and Agriculture

In emergency situations, it is crucial to consider local food production as a means of ensuring food security. Registering hobby farms, along with commercial farms, for emergency management purposes should be prioritized for effective coordination and response efforts and is a requirement under the provincial PremisesID program. The concept of buddy farms, where farmers work together to plan for livestock evacuation during emergencies, should be promoted and facilitated through meetings organized by farmers' institutes. Creating an inventory of farming assets (including on-farm water storage for firefighting purposes, crucial roads, food storage, etc.), would be useful to help prioritize resources during emergencies. Collaboration with the CVRD and farmers' institutes could help document agricultural infrastructure for the entire region. The CVRD can play a role by investing in, supporting, and advocating for regional food storage initiatives, such as a grain reserve. Additionally, food hubs can serve as storage facilities during emergencies. It is important to recognize and appreciate the existing contribution of local agriculture in reducing transportation needs and the logistical challenges associated with imports and exports. The CVRD can further support emergency management efforts by organizing workshops in collaboration with farmers' institutes.

Theme 3: Agricultural Priorities for Water Management

Access to water is the most crucial factor for maintaining farm viability. It is essential to prioritize water usage for agriculture and food processing and to give lower priority to commercial activities like water bottling plants – when local drinking/potable water is already great quality and bottled water is unnecessary. Increasing water metering and permitting for residential users is necessary to regulate water usage. It is important to recognize that residential developments often have a negative impact on the entire water system due to changes in land cover, such as increased impermeable surfaces, compared to farming. Increasing public education and communication regarding water issues, management, and drought is important. Establishing a regional watershed stewardship service, with representation from the agriculture sector, would be beneficial. This service could provide several benefits, including resources for existing watershed groups to monitor wells. Affordable on-farm water storage options are needed to ensure water availability. The CVRD could advocate to the Province to reduce regulations associated with water dugouts and groundwater levels. The CVRD could advocate to the Province and Department of Fisheries and Oceans to improve the management of ditches to prevent flooding onto agricultural lands. The CVRD should also advocate for better forestry practices in upland areas to minimize negative impacts on downstream water sources. The CVRD should also continue implementation of the Tsolum River Agricultural Watershed Management Plan.

Theme 4: Business Viability in the local agriculture sector

Various challenges identified for farm business viability include the high costs of on-farm insurance and farm inputs, labor capacity issues, and the need for affordable housing for agricultural workers. To support agricultural businesses, there is a need for more suppliers of farm equipment in the region, additional meat processing facilities, local networking opportunities, knowledge transfer, and extension support. A guaranteed minimum income could also be beneficial. One of the key suggestions is the establishment of a permanent site for a year-round Farmers' Market, with the CVRD and municipalities

offering reduced rent to support this initiative. The Farmers' Market serves as an important platform for supporting new entrants into farming. CVRD could also support Young Agrarians (YA) and promote events. With respect to agri-tourism, there is a need for a better-coordinated Growers Guide for the region. Integrating agri-tourism into a regional tourism initiative would also be beneficial, though producers are mixed on whether they would like to participate on hosting on-farm activities. Regarding the proposed Food Hub, many participants supported having the initiative resolved through implementation. Some indicated that the Food Hub should focus on livestock processing, storage, and the aggregation of meat products while others preferred a more open approach.

Other comments:

- Urban agriculture and food security should be addressed by the CVRD in planning documents or through future studies.
- The intersection of climate change and ecosystem services with the agriculture sector should be acknowledged in the plan and by the CVRD.
- It is important to acknowledge the current and potential capacity of agriculture to adapt to the impacts of climate change and contribute to its mitigation efforts.

3.2.4 Webinar (June 2023)

An online webinar was held on June 8th, 2023, and was open to all members of the public. The following provides a summary of the discussion during the webinar. A total of 8 stakeholders attended.

Webinar: 8 stakeholders	Producer and/or Processor (3)	38%
	General Public (3)	38%
	Local Organizations (1)	12%
	Provincial Government (1)	12%

Issues identified during the webinar included:

- The need for improved transit options for farm workers to connect between farms and urban areas.
- Highlighting the huge increase in costs for farm inputs.
- Water is a very big issue for farmers and CVRD needs to have an agriculture first lens when it comes to water management.
- Forest management decisions are having upstream impacts on watersheds which negatively impact farms downstream.
- The region needs to attract and retain new entrants as farmers are retiring.

Roles for the CVRD that were identified include:

- **Advocacy:** When issues fall outside of CVRD jurisdiction, they need to be a strong advocate to the province on behalf of the sector.
- **CVRD Agricultural Service:** If an agricultural service is established, it could include activities such as coordination of emergency management for the sector.
- **Agricultural Coordinator:** The farming community appreciates a local touch point through an agricultural coordinator to help provide extension support. The CVRD could engage with Farmers Institutes about what the agricultural coordinator job position could entail, for example:
 - Helping to host events or facilitate venues for events that the Ministry can host.
 - Help coordinate emergency management with the province.

- Oversee an online centralized space where all the events are going on can be advertised – e.g., agricultural online calendar – CVRD could build this onto their website that is maintained and post/promote events.
 - Conduct or coordinate studies.
 - Identify initiatives/organizations that already work so CVRD can support them.
 - Connect new entrants.
 - Help with education in schools and to the general public (e.g., news articles).
 - Inform farmers of funding opportunities and keep a list of approved companies that can do on the groundwork (e.g., constructing dugouts).
- Incubator Farms: The concept of an incubator farm has been introduced by various community groups over time. The Incubator Farm would provide support for new entrants in the agricultural industry. Collaboration with existing organizations and local post-secondary educational institutions, such as LUSH, North Island College, and YA, could facilitate its implementation. CVRD could explore the possibility of utilizing public lands owned by the CVRD, including the exhibition grounds. Ensuring that there is a demand for such an initiative in the Comox Valley is a crucial aspect of its development.
 - Education: Promoting agriculture in the school curriculum and involving organizations like the 4H club is important. Raising awareness among the public and CVRD staff about the environmental values of farmland and supporting existing programs like Farmland Advantage is crucial. The CVRD can play a role in hosting, facilitating, and assisting with events that promote the agricultural sector, such as organizing the "eat local challenge" to encourage the consumption of locally produced food.
 - Opportunities to collaborate with Komoks First Nation: CVRD has informed Komoks First Nation of this process and there is an open door for any input, feedback, collaborative opportunities.
 - Future Studies: The following topics for future studies were suggested:
 - A Food Security Plan that complements the agricultural plan and other CVRD plans
 - A detailed analysis of the economic value of agriculture in the CVRD study (including comparison with other sectors). The Comox Valley Farmers Market Association is participating in economic benefits study in 2023 across all three farmers markets, which could tie into this broader, regional study.
 - A Market Opportunities study for farmers about what crops/products to grow and where (e.g., looking at soil type, water availability/drainage, market demand and matching land to potential crops to grow).
 - Mapping for use of agricultural assets and infrastructure during emergency management (e.g., food storage assets, transportation routes, etc.).
 - A gap analysis looking at why farmers under 10k revenue category remain there (e.g., what are the challenges and barrier they face to growth).
 - A Market Opportunities study for farm inputs – substituting imported inputs with island produced inputs (e.g., marine based fertilizers)

3.2.5 Written Submissions (May – June 2023)

Eight (8) written submissions were received – three from organizations and five from individuals - and key points from each are summarized below, presented in the order in which they were received:

Comox Valley Farmers Institute

Theme 1: Water, Land Use, Environment, and Climate Change

- Inaccurate perception that the agriculture sector is not an efficient user of water.

- Need to talk about long term water storage options for agriculture.
- CVRD can advocate and work with province to enhance and encourage large-scale and farm-scale water storage options (e.g., Wolf Lake studies).
- Valley-wide irrigation system is needed, would like to discuss a regional irrigation governance system.
- CVRD can advocate with the province to maintain rural ditches.
- CVRD can work with the province to better understand and advocate for improved forest and water management practices, which will improve drainage and minimize flooding.
- Need to work with farmers to better manage recreation and use of parks and trails near farming areas. Issues such as trespassing and harassment of livestock are becoming increasingly common.
- Need to direct certain forms of agriculture away from high quality soils (e.g., commercial greenhouses, vertical agriculture, agri-processing, indoor cannabis).
- Must discourage subdivision of large tracts of agricultural land.
- Idle farmland and rural-residential land should be incentivized to farm their lands or penalized for not farming.
- Transportation planning must accommodate the movement of farm vehicles.
- Divert agricultural plastics and promote plastic recycling from farms.
- Provide cost-effective alternatives to burning vegetative debris (e.g., chippers).
- CVRD should partner with other jurisdictions to address livestock evacuation planning.
- Ensure that solutions to challenges do not result in policies or regulations that restrict farmers as an unintended consequence.
- Include the CVFI in conversations and work being conducted that interfaces with agriculture – for example the Greenhouse Gas Emissions Inventory and subsequent mitigation efforts – the agricultural sector did not feel included in this discussion.

Theme 2: Economy and Business

- There is a gap and need for Agricultural Economic Development in the Comox Valley, particularly since the dissolution of the CV Economic Development Society.
- Need to craft and send the message that there are agricultural opportunities that can be developed and explored in the CVRD.
- Need to look outside the valley for markets (including exports) if it can bring job opportunities and positive economic impact to the valley, including “anchor” businesses such as quota-holders.
- Need to attract/create processing and storage infrastructure.
- Support agricultural education and work with educational institutions.
- The CVRD should promote, advertise, and market “Buy Comox Valley”.
- Encourage a comprehensive business case for a local agri-plex (e.g., Stonehenge property or another location). Like an aquatic centre or community centre, this could be focussed on food and agriculture rather than recreation. This could serve as permanent home for the farmers market and the food hub.
- The Comox Valley Exhibition Grounds should not be under the management of the Comox Valley Recreation Commission because agriculture is not within their mandate.

- Support the existing Class A government inspected meat processing facility and recognize how lucky the Comox Valley is to have one.
- Lack of overall local economic agriculture data makes it hard for decision-makers. Need a Comox Valley economic agriculture industry study so that many questions could be answered.
- CVRD to advocate to the province regarding affordable farm insurance.
- CVRD to advocate to BC Assessment to raise the farm income thresholds required to achieve farm tax status – these levels have not been changed since 1993 and would encourage greater production of farmland.
- CVRD to advocate to BC Ferries for reduced rates for agricultural users of the ferry system.

Theme 3: Social, CVRD, and Government

- The agriculture plan should be re-visited regularly (not only every 20 years) on a schedule so that staff have a good understanding of it and implementation is fluid.
- Urban, non-farmer voice can be very loud and can have a detrimental impact on the agricultural community. Rural vote and agricultural voices feel limited due to the way that the government system is set up. City solutions to rural situations don't always make sense nor are practical.
- The CVRD must be accountable, transparent, and define how it values and weighs feedback and input received for the Agricultural Plan.
- The Agricultural Plan should encompass farms throughout the entire Comox Valley.
- Provide regular agricultural briefings, tours for elected officials and staff so that a better understanding of agricultural issues are available for decision-making. The CVFI can partner to host tours.
- Agricultural stakeholders should be compensated for participating in committees and advisory boards.
- We must all place value on all types of agriculture and encourage growth in all ways possible.
- There are opportunities to better celebrate agriculture (e.g., something similar to the Seafood Festival), could better support the CV Exhibition Society, and ensure that the agri-plex could help serve this purpose.

Comox Valley Farmers Market Association

- We need more data and understanding regarding both current and future agricultural water needs. Would like to do a watershed analysis of both above ground and below ground water availability.
- Need to create a water reserve so that the ecological, agricultural, and residential needs are met.
- Need riparian enhancement along the Tsolum River and Portuguese Creek.
- Need a watershed service to help coordinate all the water-related activities.
- Support is needed to identify new market opportunities and provide training.
- An economic benefits study for the Farmers Market will be completed in summary of 2023.
- Need to support the farmers market better – it retails over \$1 million of products and serves as an incubator site for new food businesses. Rent reduction would help – very few markets across the Island need to pay rent.

- Move ahead with the food hub with LUSH as the food hub leader, need to move along so that funding opportunities are not lost.
- The CVRD website should feature the agri-food sector.
- CVRD should support the Young Agrarians program.
- The Exhibition grounds could be used for more agricultural education and training.
- The old compost education centre may be a useful venue for livestock/animal education.
- At least 40% of local government food procurement should come from local sources.

Comox Valley Food Policy Council

- Provide a full time Agricultural Coordinator position and create a Food and Agriculture Service under the CVRD.
- Consider including municipalities in the Agricultural Coordinator position job description to increase ongoing funding and allow for a more fulsome decision-making process.
- Agricultural Coordinator could support advocacy and build relationships with other levels of government and First Nations.
- Develop a plan for water issues – water should be the focus of the Agricultural Plan.
- Support and subsidize more on-farm water storage (cisterns, dug-outs, other).
- Create a water board to oversee water governance regionally.
- Ensure beneficial management practices are encouraged and incentives to build soil health.
- Explore incentives for local agriculture including lowering insurance costs, pay farmers for protecting ecosystem services, and encourage farms to be more prepared and resilient in the face of climate change.
- Provide support for new entrants including programs that provide support for access to land and housing.
- Collect more local data around what crops grow best in the valley based on water and soil, what gaps exist in the market, and develop promotional materials for crop viability.
- Link to food assets in neighbouring communities to increase the region's cold and dry food storage and support indoors farmers markets and food processing assets.
- Look at how local food economy can support the region in cases of emergency where highways, airports, or seaports may be affected.
- Develop a regional Food Security Plan and/or see food security planning as a major component of the Poverty Reduction Strategy.
- Ensure the Agricultural Plan has a strong implementation or action plan to outline how the goals will be achieved.

Summary of Input from Additional Written Submissions from Five Individuals

Topic: Environment and Agriculture

- Good to see federal and provincial funding for climate adaptation on farms – need to ensure the CVRD Agriculture Plan is aligned with that funding.
- Need a program to repurpose or recycle farm plastics.
- Farm chemicals need to be properly disposed of through collection programs. Includes veterinary medicines, herbicides, pesticides, fertilizers, lime.

- Biosolids usage require more local knowledge input, the used of biosolids should be banned on agricultural land.

Topic: Emergency Planning and Agriculture

- We have an excellent volunteer fire department in Oyster River and now in Merville very close to our farm. With any regional emergency planning, these two fire departments would need to be part of the plan. They have done outreach to the rural and farming community and we rely on them for safe burning practices.
- During emergencies when supply chains are disrupted, the importance of local aggregation, storage, and distribution of food is highlighted.
- When local farms can continue to produce during an emergency that is built-in Community Food Security.
- Need to be sure we are supporting local farmers with preparedness and setting up local supply chains, aggregation, distribution, and storage.
- Farmers are vulnerable to extreme weather events, and we need to make sure they have access to additional infrastructure tools, knowledge about crop adaptation, how to make their farms more resilient.
- In the case of a wildfire or other emergency it would be valuable for the CVRD to establish lines of communication with other community organizations such as the Oyster River/Merville Fire Departments and the CV Farmer's Institute or Mid-Island Farmer's Institute.
- The CVRD could help landowners prepare to defend their properties initially by assisting landowners in obtaining appropriate fire-fighting equipment to have on-site to assist with an initial attack. Or have the CVRD purchase more fire-fighting equipment and have available in emergency trailers that are situated around the Regional District at the Fire Halls.
- The CVRD could help farmers/landowners identify escape routes across the region and assist with locating buddy farms to take evacuated livestock.
- It will be important to identify the numbers of livestock trailers available to move livestock and create a map showing access routes through rural properties or farms.
- The CVRD could develop a survey asking landowners to identify those farms/landowners prepared to act as buddy farms and take some displaced livestock whether it be cows, horses or smaller animals.
- CVRD can organize 1-day workshops where farmers/landowners can start putting together an emergency plan for their farms. Provide either printed or digital maps of individual farm properties that farmers can use to create their plans. Encourage the development of templates that farmers can just fill out instead of having to develop the plan from scratch. This is something an Agricultural advisor within the CVRD could assist with.

Topic: Agri-Food System Infrastructure and Economic Development

- Ensure activities at the Exhibition Grounds support agriculture. Could have more food production there, expand the School Garden and get more land into production.
- Agri-tourism is an important aspect of agricultural sustainability and education but can also be taken advantage of (e.g., building a campground without permits).

- CVRD could put public lands into a land trust for the specific purpose of being an incubator for new farmers and provide a serviced camping area for farm workers. This would support new farmers.
- Need a better understanding of food flows – what is coming in and what is going out.
- Need to know what storage assets there are in the community.
- Need better information on the actual value of agriculture to the Comox Valley – both economic and social including non-costed benefits.
- The island had the capability of supporting itself and need to consider the future and the ability to have more local capacity.
- Support for local processing facilities and storage (possibly a co-op model). Both are aspects of a food hub model and Emergency Preparedness.
- Transit is required to deliver workers to farms.
- Road access is needed to improve access to farms and for use of farm equipment.
- The island needs an improved rail route for bulk transport.
- Marine transportation can be improved with BC Ferries offering better rates for farmers or dedicated bulk services (barge).
- Local labour pool could address seasonal/periodic labour needs. Could coordinate transportation.
- Agri-plex is a good vision for agriculture and strong economic driver for the Valley. Can attract programs, events, be a venue for the food hub, commercial kitchen, meeting spaces, farmers market and others.
- Decrease in larger scale agriculture means less support from farm machinery business (e.g., lack of repair or supply services from Kubota).
- Encourage Ministry of Transportation to put notice of farms and farm machinery movement signs on highways.
- Machinery mechanics are lacking in the community – need a dealership for larger tractors.
- Insurance companies that are knowledgeable about farming operations are needed.
- At one time, the Food Hub seemed like an option for a commercial kitchen to produce some value-added products from beef operations, i.e., bone broth. However, cannot manage doing both farming and valued added products, especially with something like bone broth which needs to be supervised all day.

Topic: Land Use and Water Planning and Agriculture

- People who buy and develop ALR land need to be better informed about what they are allowed to do – the CVRD can provide this information.
- Small agricultural parcels are being developed primarily as residential properties and should not pose a threat to adjacent farms. For example, if developing ALR for non-farming purposes should require a setbacks and buffering in alignment with ALR/non-ALR boundaries.
- Siting of residential development on farmland should be regulated so that it is not on the most arable soils, and not close to neighbouring agricultural activities.
- Ensure that ALR rules to protect farmland are being properly applied throughout the permitting process.

- Encourage changes in how the CVRD respects the rules of the ALR when buildings are being considered and permitted, particularly residential buildings and accessory buildings.
- Refer building applications to the ALC so that they can be properly addressed and considered to protect viable soils.
- Agriculture water dugouts and water storage needs favourable regulations.
- Concern that not enough is being done to ensure that there is a sufficient water supply to grow the agricultural economy.
- Need assistance to build infrastructure to assist farmers in areas with good soils access water supplies.
- Look at building more ponds within water courses to increase areas of water supply for fish during summer months.
- Building requirements for farm housing have become ridiculous and are tied with an over-inflated insurance system.
- Put an annual charge on residential wells and encourage sufficient water supply for agricultural use.
- Limit residential development on rural lands.
- Concern is the potential for chasing of cattle by neighbor's dogs even with fencing.
- There are required setbacks from agricultural operations on ALR properties, but no such requirements exist for other rural properties. We have a legitimate farm on a larger RU-8 property that has a minimum subdivision requirement of 20 acres. There is no requirement for our neighbors to create a buffer between our farm operation and their new building, nor to submit a logging plan indicating their choice to remove all the Douglas-fir trees on their property including along our joint fence line. My concern is the potential for windthrow this winter causing damage to our fence line. Requirements for buffers should be consistent across all rural land within the CVRD.
- The CVRD should take note of all properties with farm-status, regardless of land zoning, and extend the same buffers to all farmed lands within the CVRD. Also, to request a logging plan, especially for smaller properties adjacent to farm lands where the farm may be impacted.
- Continue to ensure larger parcels of land in the CVRD remain large, and are not subject to further subdivision, regardless of whether they are in the ALR or under other zoning,
- Smaller parcels of land contribute a significant role in agriculture in the CVRD, but it does not highlight the expense of having to lease, fence, or utilize a number of smaller parcels with different ownerships just to farm in the Comox Valley. Also, there is no security for those renting farm parcels, and the owners reap the benefits of farm status.
- A regional Water Board or stewardship service is a good idea, but the emphasis should be on supporting access to water for agricultural use, instead of focusing solely on salmon and fish habitat preservation.
- All rural (and town) residential wells should have monitoring devices on them, to encourage water conservation, and those wells should also be licensed or require a yearly fee for the water use. This will help people understand the true cost of the water.
- The importance of a regional stewardship service would be to determine in a general way the amount of water required in the future for agricultural operations in the Comox Valley, and to ensure that a significant amount of water is indeed set aside for future farming use.

- Any additional rural development for residential use in the Comox Valley should be based on water resources. Until we have a handle on how much water is actually available, we should consider restricting additional rural development until that amount is determined.
- There should be thought given to installation of “reverse” drainage systems that will retain subsurface water on-site during dry periods.
- The CVRD should be focusing on identifying “water recharge areas”, possibly through a survey, and encourage landowners to retain tree cover and leave more natural undisturbed treed areas. Some of these areas can double as “riparian areas”, which could be lightly grazed by livestock during dry periods. This should apply to ALL rural landowners in the RD, not just farmers.

Topic: Education and Communication

- Support for Farmer Institute conferences and field days.
- A section on the CVRD website for agriculture.
- Host an annual tour of farms for elected officials, in partnership with the Farmer Institutes.
- Update the Farmer Handbook that was created about 5 years ago.
- A map on the CVRD and 4VI websites of local farms that have farmgate sales and/or website.
- Support a vision for the Agricultural Plan where food and agriculture are at the heart of the community. That way projects that put food and farming at risk would not be approved/supported.
- Need education, supportive regulation for compost and manure.
- Host a regular meeting for all farmers to provide an updated on the Agricultural Plan implementation.
- Agriculture theory and farming course credits with North Island College, certificates in irrigation, soil health, forage production, animal health, greenhouses management.
- Need to offer trad courses and certification (e.g., butcher)
- Partnership with SD71 for more curriculum in schools about life and food, in-class visits, school farm projects, field trips.
- Many young individuals trying to farm have insufficient training or are poorly prepared for dealing with the challenges of farming.
- People who re-locate to the country don’t always understand the effects their actions have on farming activities such as taking down trees that act as wind barriers, risks of subsequent windthrow with removal of trees, and damage to farm fences from downing trees. They don’t seem to understand the expense incurred by putting up fences (that also keep their dogs in).
- Where public corridors skirt agricultural properties raising livestock, fencing should be erected by the CVRD along the length of the agricultural property using wildlife fencing, i.e., mesh fencing no less than 6-inch squares to prevent dogs from entering these properties, and it should be installed and paid for by the RD using public funds. Consideration should also be given to creating corridors for wildlife around these fences that they can travel through, but dogs cannot.
- There needs to be more public education with regards to the effects of off-leash dogs on farm livestock (and wildlife).

- There needs to be more public education on the value of grasslands and the role that cattle play in maintaining grasslands, and reducing risk of wildfire.

Topic: Policy, Governance, Advocacy

- Develop a procurement policy to ensure that local food is served at CVRD events.
- Support for a “Local First” policy regarding emergency planning and agriculture. The CVRD Emergency Program could work with agriculture to build relationships with farmers.
- Agriculture must be present as a voice on the CVRD, recognize different issues between urban and rural. Need to advocate and communicate to other agencies such as Ministry of Transportation, Ministry of Forests, BC Ferries.
- Local politicians need to see the bigger picture and the integration of the components.
- It was great to see the CVRD hire an Agricultural Coordinator and would like that position to be re-instated.
- Need to lobby for reduced water fees for agricultural use by encouraging annual payment fees for homeowners.
- The availability for funding grants is over-subscribed and short-term by design. Not enough time to submit funding applications at a moment’s notice.
- Maintenance of forage/grasslands and/or forested lands which act as a carbon “sink” should be encouraged for all rural landowners.
- An Agricultural service might be valuable for the CVRD, as long as that individual has agricultural experience.
- Most of the work in the Comox Valley around water sources has historically revolved around preservation of “fish habitat” rather than looking at the aspect of water retention areas. This has caused much conflict with the farming community, which continues today with volunteers wandering across farmer’s property without permission, violating biosecurity protocols and leaving gates unsecured.
- With a focus on only fish habitat, the CVRD has created maps outlining areas of “fish presence” to “possible fish presence” in rivers and creeks with year round water flow to seasonal watercourses and even road ditches. These maps have now become the “set in stone” foundation for which any development or land use activities adjacent to these areas must be measured and assessed. However, the information on these maps should be used as a “guideline” for assessments rather than accepting their hard and fast boundaries. With the amount of rainfall and subsequent localized flooding the Comox Valley receives during the winter, it is very possible that in areas of fish presence, the fry could be washed over into road ditches where they do not normally reside. However, these ditches do not represent fish habitat that will sustain life for the long term. They have simply been transported to a habitat that is hostile to their survival. Case in point, these ditches are cleaned out when Ministry of Transportation deems necessary, and local roads receive many applications of salt/deicing agents over the winter for safe travel, which definitely goes against the requirements for fish habitat. Therefore, why are landowners and farmers required to have a “Riparian Assessment” carried out by an RPBio for a road ditch if they need to remove a tree or two? The CVRD needs to take on a more common-sense approach to “fish habitat” if they want farmers to continue to farm. They need to reduce the amount of regulations instead of increasing them.

3.2.6 Third Round of Engagement (February – October 2024)

A final round of engagement for the Comox Valley Agricultural Plan Update was initiated in February 2024 and was extended to September 30th 2024 in order to best accommodate the busy and seasonal schedules of the agricultural community. Meetings were conducted in person and online with producers and an online survey was offered to the general public.

In Person Meetings (February 2024)

The in-person meetings took place outside of the growing season in February 2024 in order to best accommodate the farming community’s schedule. They included”

- **CVAP Project Advisory Committee:** A presentation was provided to the Project Advisory Committee in February 2024. Discussion centred around relatively minor adjustments and wordsmithing suggestions, which were subsequently undertaken prior to the revised final draft of the CVAP being made publicly available in July 2024.
- **Comox Valley Farmers Institute:** An in-person presentation was provided at the CVFI Annual General Meeting in February 2024. The presentation sparked good discussion. Some feedback included a desire to see additional measures to recommend year-round agricultural use of the Exhibition Grounds. However, several individuals attempted to create a disruptive atmosphere by asking questions that were unrelated and/or misinformed about the CVAP and the engagement process. It was later confirmed that these individuals were not members of CVFI, nor were they local producers. Therefore, their input was not integrated into the final CVAP. The CVFI also submitted their feedback in writing, as described below.
- **Comox Valley Farmers Market Association:** While the CVFMA was not available to meet in person, a presentation and discussion was held over Zoom. Feedback was largely positive, with emphasis placed on the need/desire to find a permanent year-round location for the farmers market.
- **Mid-Island Farmers Institute:** The President of MIFI indicated that no feedback had been received by members and therefore a meeting was not requested on their behalf.

Written/Emailed Submissions (July 10 – September 30, 2024)

On July 10, 2024, a revised final draft of the CVAP was emailed to the list of interested individuals who had provided their email contact to the consulting team over the past two years. The final draft CVAP was also posted publicly on the CVRD website at this time. An online portal was created so that submissions could be received directly through the CVRD website. A link to a short survey was also provided. A press release was issued and media uptake included a piece on CBC Radio (All Points West) and the Times Colonist, among others.

Over the summer and up to September 30 2024, input was accepted by way of phone, email, and letters. We have summarized the feedback received through written/emailed submissions below by separating out the input received from members of the agricultural community and those who are not participating in agriculture or farm-related activities.

Agricultural Community Submissions

We received five (5) written submissions from the agricultural community:

- **Comox Valley Farmers Institute:** A written submission that stated the need and desire to see a central Comox Valley agriculture-centric building at the CVEX site be concretely re-addressed. This could be tied to recommendations 3.1, 3.4, 5.3, and 5.4. Described the history of agriculture at the CVEX site and the previous decisions being made in good faith to include agriculture in future site plans, including the 2017 Master Plan. There is a need for a building, as “home” for many of the activities and initiatives presented in the CVAP; and stated opposition to the CVEX grounds being managed for recreation purposes only by the Comox Valley Recreation Commission.
- **Regional Agrologist with the Ministry of Agriculture and Food:** Input was minor, with suggestions for including considerations around water availability when issuing residential building permits, the need for enforcement of water regulations on non-agricultural rural residential properties, and the need to educate the real estate industry about water licensing requirements. Overall comments were supportive: “Thank you for the opportunity to help this important work. Your team has done a great job getting to this point and I look forward to the final product.”
- **Local nursery producer:** Concerns were expressed regarding the impact of residential development on water supply as the data available is not sufficient to understand the impact clearly. Indicated that the CVRD building permit department could undertake training / education regarding legislated restrictions on development of ALR land. Suggested that a package of relevant information regarding permitting to develop on ALR land would be helpful. Could also be done for other issues such as water use, riparian protection, etc.). Suggest that actions 3.2 and 3.4 are best handled by the local agricultural community and to move CVRD to a supporting role. Requested that compliance and enforcement be given high priority.
- **Member of the Agricultural Area Planning Commission:** Comments focussed on bringing goals regarding water to a high level of priority; importance of educating members of the public about supporting local farmers; support for alternative routes to market (not just focussing on the farmers market as a vending option); placing a high priority on advocating for adopting environmentally-friendly farming practices; and the need to support farmers over the long-term (multi-generational); and the importance of the CVRD playing an advocacy role.
- **Comox Valley Food Policy Council:** The submission contains several highlighted areas of support and suggestions for future work to further support the CVAP. Examples include support for the Agriculture/Food Systems or Food Security Planner position being funded by all 3 municipalities and 3 Electoral Areas so that the role could address Regional Growth Strategy priorities and other long term planning initiatives and to access LGCAP funding for the role (e.g. Alberni Clayoquot Regional District and Bulkley Nechako Regional District); the need to create a water governance structure such as a watershed board (e.g. Cowichan Watershed Board and Okanagan Water Board); support for the development of a Food Security Plan, the importance of working with K’ómoks First Nation in emergency planning; food system asset mapping; and a future focus on coastal food systems such as fisheries and aquaculture. The Food Policy Council also leans support for the creation of a permanent year round dedicated space for the farmers market.

Non-Agricultural Community Submissions

There were seven (7) submissions received by email or through the CVRD web portal from the non-agricultural community. Many of the comments and questions were identical across these submissions. The feedback included a list of concerns about government overreach, increased regulations, and the potential negative impact on local farmers. The respondents expressed general opposition to the plan

and its process, and specific opposition to most of the recommended actions. This included concerns that the CVAP will prioritize bureaucratic control, raise taxes, and limit farmers' autonomy. However, the comments were not substantiated, nor were they supported or repeated by members of the agricultural community.

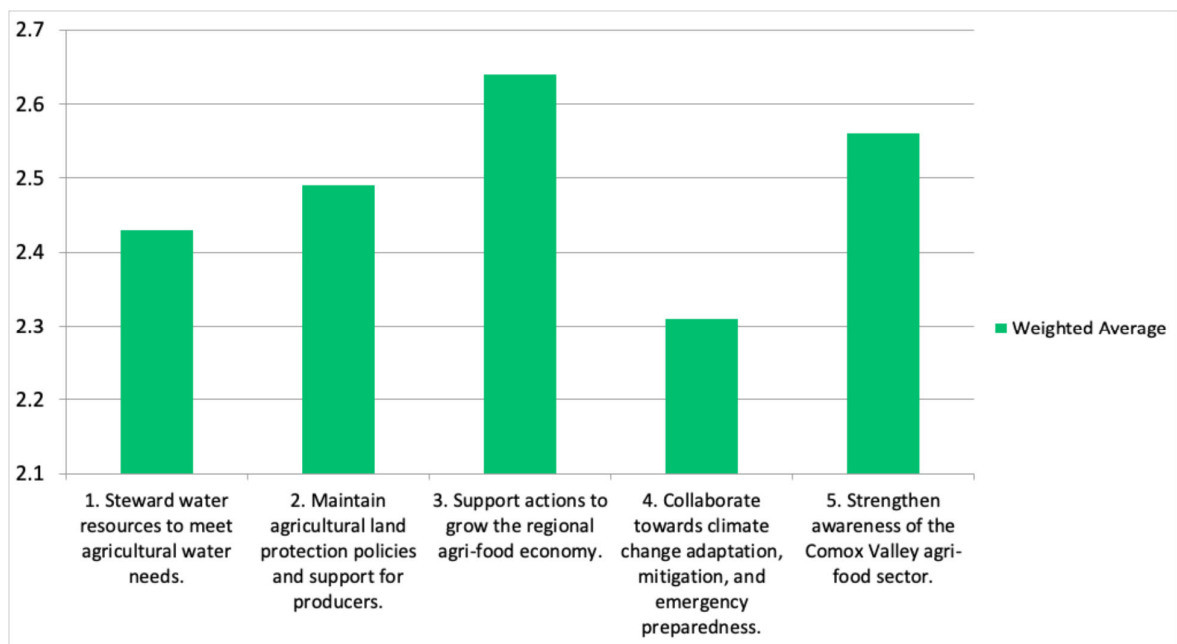
Survey Results (July to October 2024)

A survey of 5 questions was published on the CVRD website and was open for members of the public to complete between July 10th and September 30th, 2024. A total of 45 respondents answered, however only 20 respondents replied to all five questions. It was not possible to ascertain if the respondents were members of the agricultural community or not.

The results are summarized below.

Question 1: *To what degree do you support the five goals outlined in the Draft Agricultural Plan (see Section 2.2 of the Plan)? Where 1 is do not support, 2 is neutral, and 3 is fully support.*

There were 45 respondents to this question. Goal 3 “Supporting actions to grow the regional agri-food economy” garnered the most support. While Goal 4 “Collaborate towards climate change adaptation, mitigation and emergency preparedness” garnered the least support.



Question 2: *How well do you think the Agricultural Plan's proposed strategies and actions will help to achieve each of the 5 goals (see Section 2.3 of the Plan for the detailed descriptions of the recommended actions)?*

There were 33 respondents to this question. Respondents were given the choices of “Well”, “Adequately”, “Poor” and “Don’t know”. On average around a quarter of the respondents voted “don’t know” for each the strategies listed.

Some of the most supported strategies included:

- Identify and support opportunities for school-aged children to learn about the food and agriculture system: 66.7% well or adequately; 10% poor; 23.3% don't know.
- Seek opportunities for establishing a permanent location(s) for farmers markets and local food retail: 64.5% well or adequately; 19.4% poor; 16.1% don't know.
- Develop an Agri-Food Sector Market Assessment: 54.8% well or adequately; 35.5% poor; 9.7% don't know.
- Enhance Compliance and Enforcement. 45.6% well or adequately; 32.3% poor; 22.6% don't know.

While others were polarizing:

- Maintain the Agricultural Coordinator position. 38.7% well or adequately; 41.9% poor; 19.4% don't know.
- Develop a regional Food Security Plan for the Comox Valley. 36.7% well or adequately; 40.0% poor; 23.3% don't know.
- Re-assess the role of the Agricultural Advisory Planning Commission. 32.2% well or adequately; 35.5% poor; 32.3% don't know.
- Work to support succession planning and new entrants in ensuring the longevity in the sector: 41.9% well or adequately; 35.5% poor; 22.6% don't know.

Question 3: *As the next step, the CVRD will be working to develop an implementation strategy to identify resourcing and support needs for the Agricultural Plan. Would you support the creation of a Regional Agricultural Service?*

There were 33 respondents to this question.

- Yes: 12
- No: 12
- Maybe: 9

Question 4: *If you answered yes or maybe to #3, how much would you be willing to pay annually?*

There were 19 respondents to this question.

- \$20.00 or more: 7
- \$10.00-\$19.99: 4
- Less than \$10.00: 0
- Don't know: 8

Question 5: *Are there any other comments you would like to share with regards to the Draft Agricultural Plan?*

There were 28 respondents to this open-ended question. The responses are grouped into five common themes.

1. **Need for a Permanent Location for Farmers' Markets:** Several responses emphasize the importance of securing a permanent venue for the Comox Valley Farmers' Market. The current location is described as insufficient, with logistical challenges like rough terrain, inadequate facilities and parking, and high rental costs. A permanent site would provide stability and support local food producers and vendors.
2. **Water Stewardship and Conservation:** There is concern about water usage and conservation, particularly regarding agricultural water licenses and their potential impact on local streams

like the Tsolum River and Portuguese Creek. Respondents highlighted the need for better monitoring, water metering, and balancing farming with the preservation of fish habitats.

3. **Over-Regulation vs. Local Control:** A notable divide exists between respondents advocating for more local control and reduced regulations on farmers versus those who support government intervention to protect environmental and agricultural sustainability. Some respondents express frustration with over-regulation and government interference, while others call for stricter enforcement of agricultural and water management policies.
4. **Support for Local Agriculture:** Respondents generally agree on the importance of protecting the ALR from development, supporting local farms and food production. Ideas such as encouraging collaboration among farmers, creating new farmer training programs, creating a career stream for agriculture in secondary schools, and providing land access for young and new farmers are proposed. The need for better infrastructure and markets for local food processing and sales is also mentioned.
5. **Collaboration and Long-term Planning:** Many respondents stress the importance of collaboration between different stakeholders, including local governments, farmers, and the broader community, to ensure sustainable food production. They also call for more detailed and measurable targets with clear timelines for implementation.

CVRD Staff Meetings

Throughout September 2024, meetings were held with CVRD staff to discuss how the implementation of the CVAP recommended actions could best be accommodated.

These included meetings with:

- Long Range Planning
- Policy and Current Planning
- Communications
- Recreation Services
- Parks
- Water and Liquid Waste

Conversations were centred around which actions could be undertaken with relative ease using existing resources, which actions would require additional capacity, and which should be prioritized. This feedback resulted in some minor wordsmithing in the final CVAP and informed the Implementation Strategy.