

November 4, 2020

To: Whom it May Concern

Re: ALR Application 61443

### **1.0 Introduction**

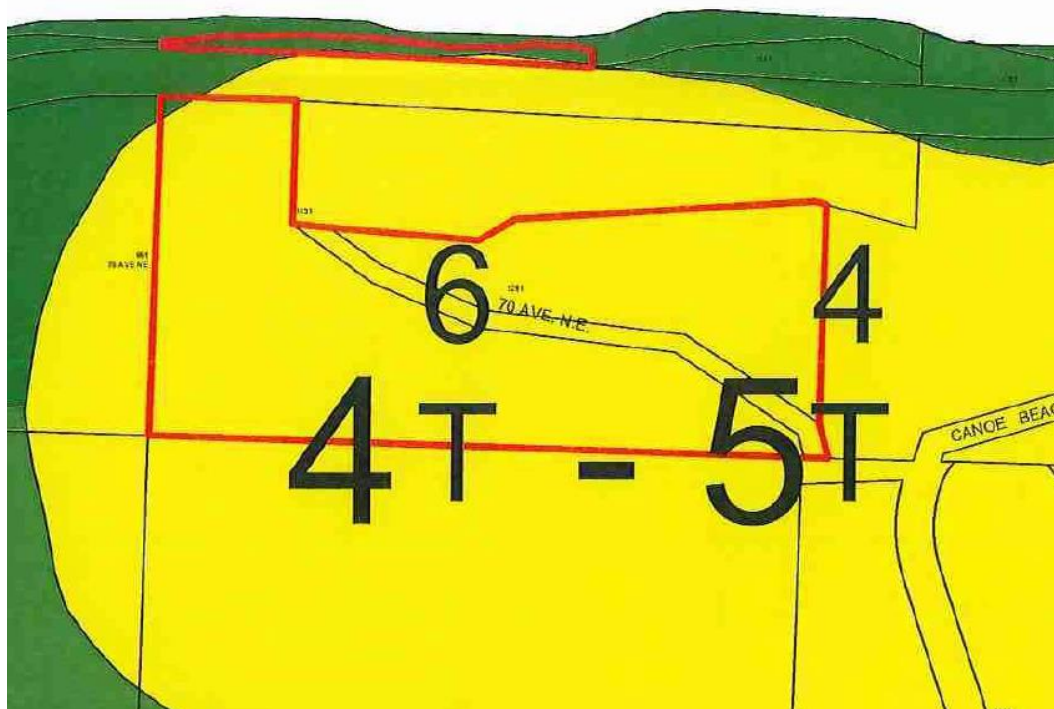
I have been asked by the applicant, Richard Smith, to provide an opinion on the impact on agriculture from this application. The applicant seeks to exclude 1.862 ha of land within the Agricultural Land Reserve and include some 1.865 ha.

I inspected the property on November 3, 2020. I have been provided with maps produced by Brian Sansom, P.Eng.

### **2.0 Soils Information**

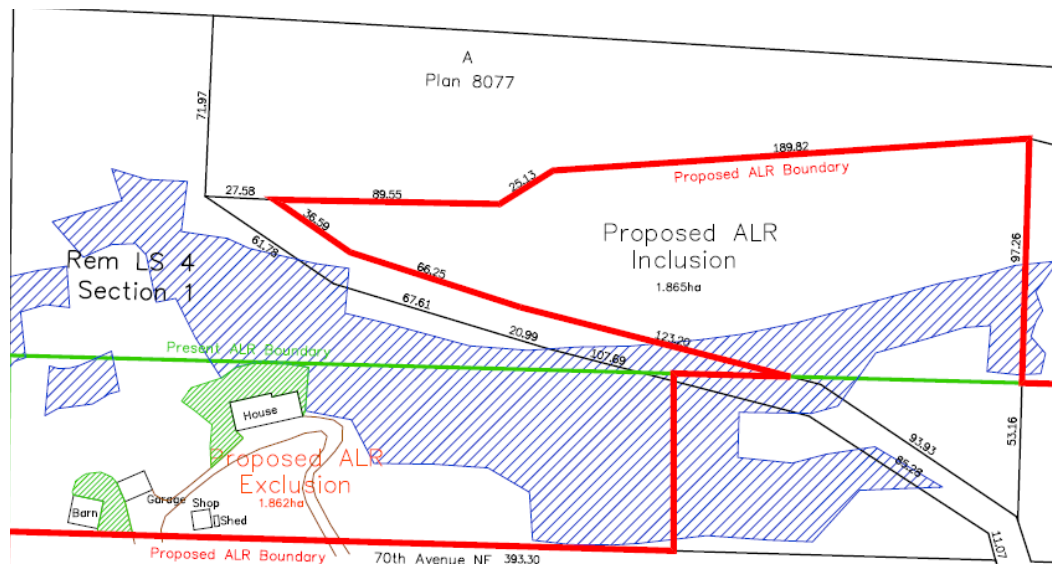
According to the Canada Land Inventory maps, the parcel lies within a landform that is classed as 60% Class 4 limited by topography and 40% Class 5 limited by topography in both the unimproved and improved categories. These classifications are shown in Figure 1.

**Figure 1: Canada Land Inventory Classification of Subject Parcel**



However, the Sketch Map of the proposal includes a hatching taken from the City of Salmon Arm contour analysis of slopes over 30%. This hatching is shown in Figure 2.

**Figure 2: Sketch Map of Proposal**



In understanding the role of slopes in the Canada Land Inventory, I referred to the document, *Land Capability Classification for Agriculture in British Columbia* produced by the Ministry of Environment, Surveys and Resource Mapping Branch and the Ministry of Agriculture and Food, Soils Branch in April 1983. It is available online in the Agricultural Land Commission library although I have had a copy for reference for some years. I further consulted with Melanie Piorecky, P.Ag., a Pedologist qualified under ALC Policy P-10, *Criteria for Agricultural Capability Assessments*. She confirmed<sup>1</sup> that this manual is current in providing the criteria for slope assessment.

With regard to slopes over 30%, the manual states:<sup>2</sup>

CLASS 6T: Slopes, either simple or complex, varying from 31 to 60% and the land in its present condition provides sustained natural grazing for domestic livestock.

CLASS 7T: Slopes, either simple or complex, greater than 30%. The land in its present condition is not useable for either arable agriculture or sustained natural grazing by domestic livestock.

The question for me to answer was whether the land in its present condition is suitable for sustained natural grazing (Class 6) or not (Class 7).

The sloped area is well treed with mosses and litter on the forest floor as shown in Photograph 1.

<sup>1</sup> Email to the Author from Melanie Piorecky, P.Ag., November 2, 2020.

<sup>2</sup> Ministry of Environment, Surveys and Resource Mapping Branch and the Ministry of Agriculture and Food, Soils Branch, *Land Capability Classification for Agriculture in British Columbia*, April 1983, Page 29.



**Photograph 1: Forest Floor of Proposed Exclusion**

Therefore, it is my opinion that the area is not suited for either arable agriculture or sustained natural grazing. The appropriate classification according to the manual is then 7T.

It should be noted that the landform to the east of the subject is classed as 70% Class 7 and 30% Class 4 both limited by topography. Given that these classifications were made using aerial photography<sup>3</sup>, I assume that the classifiers missed the subject slopes, probably because of forest cover.

Apart from the limitations from topography, the parent materials are clay as shown in Photograph 2.

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<sup>3</sup> Runka, G.G., P.Ag., *Methodology, Land Capability for Agriculture*, B.C. Land Inventory (CLI), Soil Survey Division, B.C. Department of Agriculture, Kelowna, B.C., January, 1973





**Photograph 2: Cut showing the Parent Clay Material**

The area proposed for inclusion in the ALR does not have the topographical limitation so good agricultural production should be expected. The area is currently used for pasture (Photograph 3) and Haskap berries (Photograph 4).



**Photograph 3: Pasture Land on the Proposed Inclusion**





**Photograph 4: Haskap Berry Plants**

The berry plantation is below the half acre maximum allowed for irrigation by the City of Salmon Arm bylaw.

### **3.0 Analysis and Opinion**

According to the sketch maps provided, the area proposed for exclusion has 7,500 m<sup>2</sup> of slopes greater than 30%. Given the criteria in the manual, the area should have been classified as Class 7 and therefore should not have been included in the Agricultural Land Reserve. The issue was not problematic until Mr. Smith wished to use a Carriage House as a second dwelling. Then, it became a problem. By excluding that part of the parcel, Mr. Smith would be free to continue his plans. In my opinion, the development would have no impact on agriculture since there is none on this part of the parcel.

On the other hand, the area slated for inclusion is arable and is being used for small farming. Therefore, its inclusion in the ALR formalizes a current use.

The current purposes of the Commission are:

- (1) The following are the purposes of the commission:

- (a) to preserve the agricultural land reserve;
  - (b) to encourage farming of land within the agricultural land reserve in collaboration with other communities of interest;
  - (c) to encourage local governments, first nations, the government and its agents to enable and accommodate farm use of land within the agricultural land reserve and uses compatible with agriculture in their plans, bylaws and policies.
- (2) The commission, to fulfill its purposes under subsection (1), must give priority to protecting and enhancing all of the following in exercising its powers and performing its duties under this Act:
- (a) the size, integrity and continuity of the land base of the agricultural land reserve;
  - (b) the use of the agricultural land reserve for farm use.

While the proposed exclusion removes a piece of the ALR contiguous to the area to the south, the inclusion is contiguous to the ALR to the east of the exclusion. Thus, the continuity and integrity of the land base is maintained while the size is not changed significantly. Further, the inclusion of land currently being farmed will satisfy the need to consider the use of the ALR for farm use.

I remain available to discuss my findings and opinion in this letter.

Respectfully submitted,


A handwritten signature in dark ink, appearing to be 'R.G. Holtby', with a long, sweeping horizontal line extending to the right.

R.G. (Bob) Holtby, P.Ag.

Sketch Plan of Proposed ALR Inclusion/Exclusion Exchange  
LS 4, Sec 1, Tp 21, R 10, W6M, KDYD, W6M  
except Plans 31 and 8077

Areas:

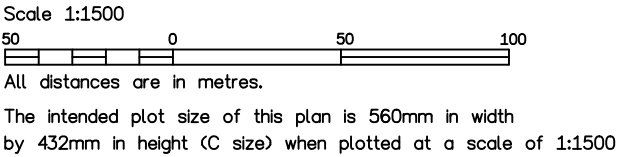
Proposed to Include:	1.865ha
Propose to exclude:	1.862ha
Area presently within ALR unuseable:	
Buildings:	600m <sup>2</sup>
Driveway:	860m <sup>2</sup>
Lawn:	1125m <sup>2</sup>
Slopes over 30%:	7500m <sup>2</sup>
Total unasable:	1.009ha

 Areas over 30% slope (City of SA contour analysis)

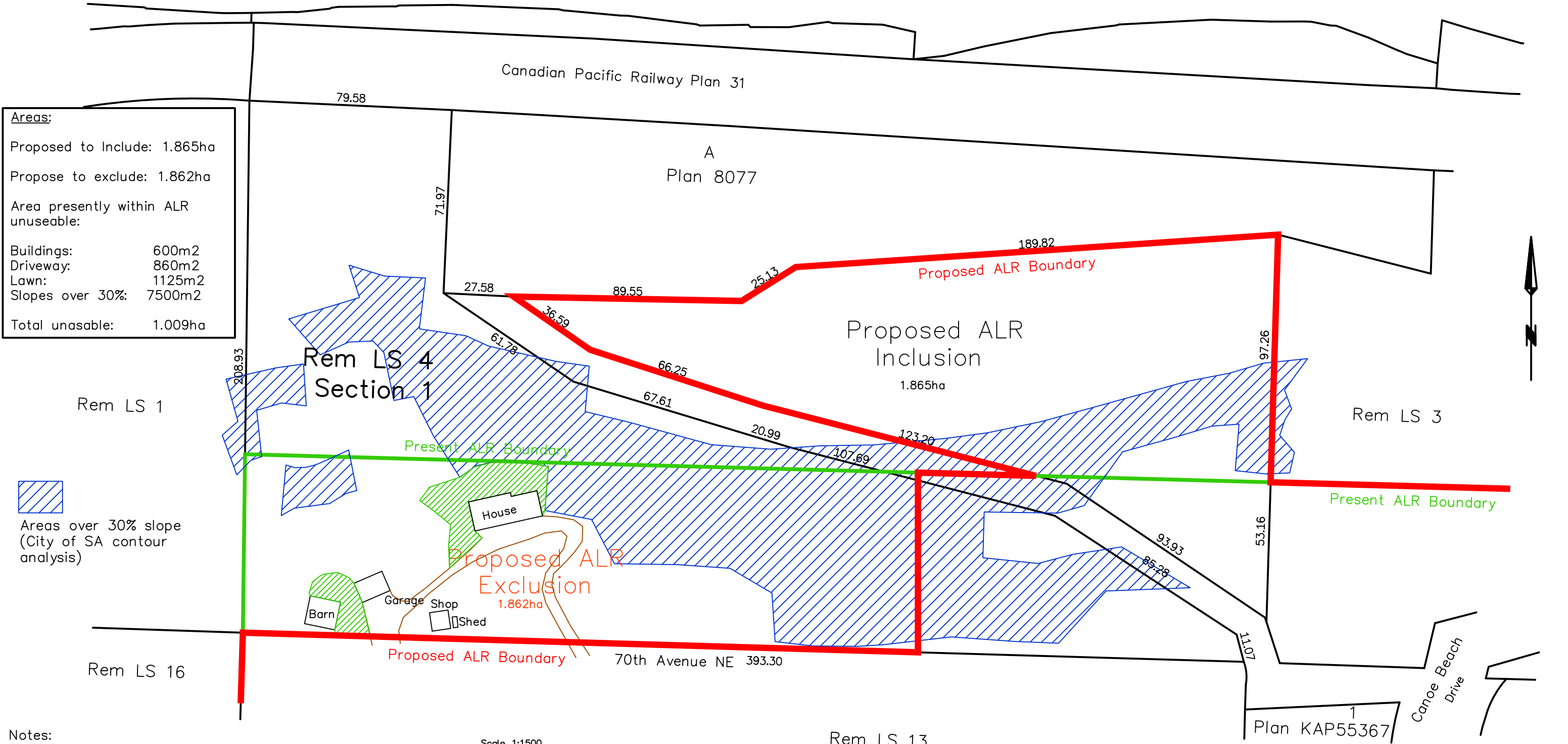
Notes:

Date of Sketch: November 3, 2020

Site information provide by owner and aerial imagery.



B.D. Sansom Land Surveying Inc.  
Land Surveying and Geomatics Engineering  
Salmon Arm, BC sansomsurveying.com  
File No: 2020083






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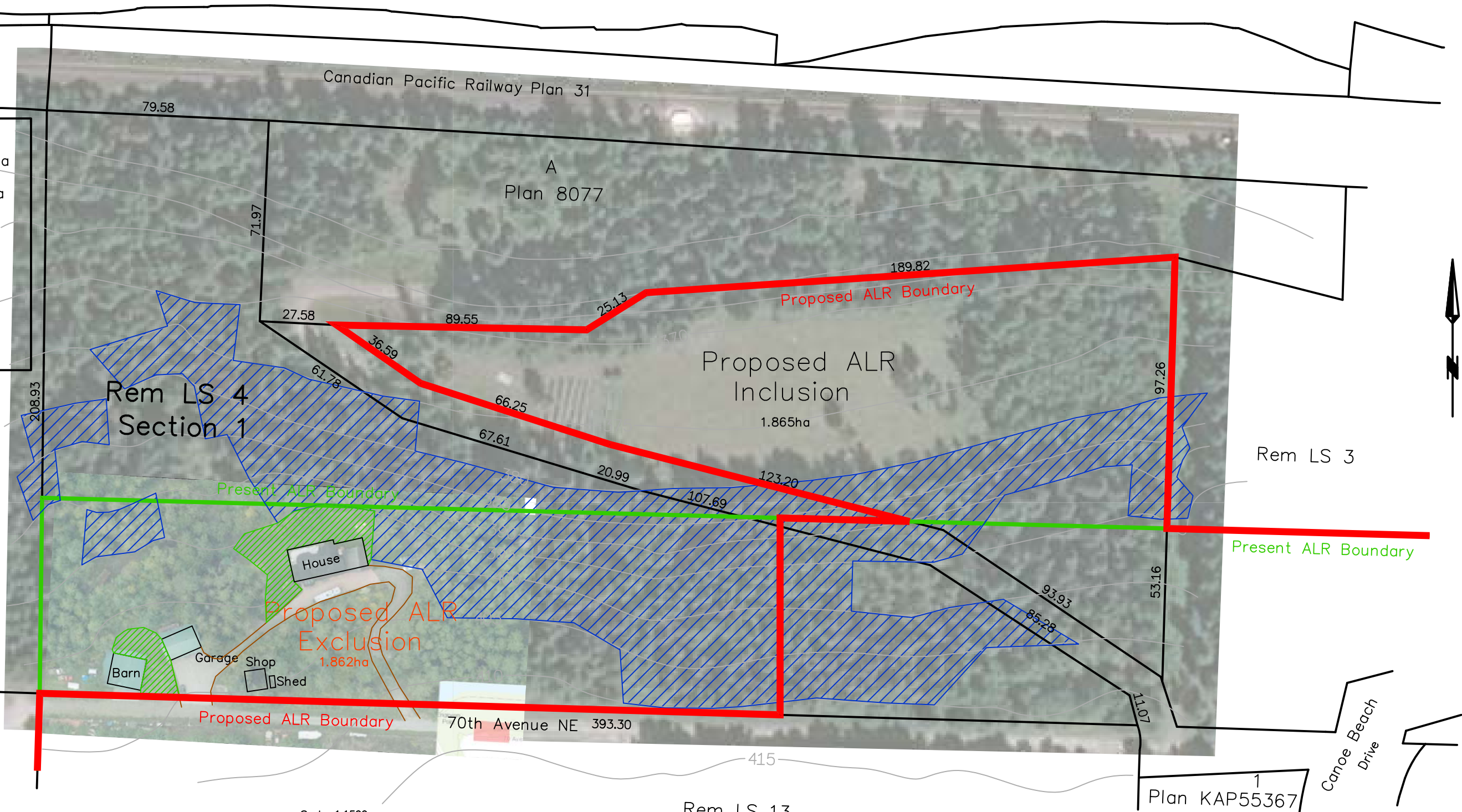
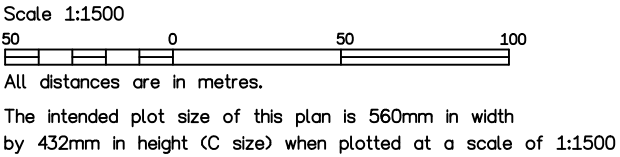
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