

**Agricultural Land Use Planning
in Northern British Columbia**

**Case Study of
Regional District
of Fraser-Fort George**

FINAL REPORT

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Executive Summary

In this report we present the results of a study of agricultural land use planning for the Regional District of Fraser-Fort George. (RDFFG), a large geographic area located in the central and central-east interior of British Columbia. To assess the region as a whole, we examined the breadth and quality of seven local legislative frameworks that govern agricultural land use planning, including policies, legislation, and governance. To gain further insights, we examined the local legislative framework of Robson Valley-Canoe Downstream (RVCD) area as a case study site. For the case study, we assessed the strength of the local framework for agricultural land use planning using four principles as criteria: maximise stability, integrate public priorities across jurisdictions, minimise uncertainty, and accommodate flexibility. The case study also involved an assessment of the political context within which agricultural land use planning takes place and decisions are made. This part of the assessment included documentation and analysis of three policy regimes: farmland preservation, global competitiveness, and food sovereignty. A policy regime refers to the combination of issues, ideas, interests, actors, and institutions that are involved in formulating policy and for governing once policies are devised.

The aim of the study is to lend insight to the state of agricultural land use planning in the RDFFG. It also contributes to an understanding of the state of agricultural land use planning in northern BC. Finally, the study is part of a broader national project to identify principles and beneficial practices that represent land use planning solutions that protect farmland.

Overall, we found that agricultural planning in the RDFFG as a whole is moderate, with some weak elements. This assessment reflects the RDFFG’s stated interest in protecting good agricultural land alongside a general support for accommodating non-farm uses and subdivision. The RDFFG’s policy to support the general objectives of the ALC to protect farmland is not as strong as a direct statement to protect farmland. This moderate language takes away from the strengths of the local framework, which include a high level of intra-plan consistency among agricultural land use policies and an ability to accommodate flexibility without introducing unnecessary levels of uncertainty. This is evident in the Rural Community and Special Management Area designations. However, the strengths of the framework are weakened by a low level of integration of provincial legislation to protect farmland within the local legislative framework.

Principles of Land Use Planning, Robson Valley-Canoe Downstream Area

Regional District	Maximise stability	Integrate across jurisdictions	Minimise uncertainty	Accommodate flexibility
RDFFG: Robson-Canoe Downstream	**	**	***	****

* = Very weak; ***** = Very strong

With regard for maximising the stability of the local legislative framework, we found this to be an area of weakness for the Robson Valley-Canoe Downstream area. A key element of stability is a clear statement of purpose regarding farmland protection among the primary goals and objectives within each enforceable document. Official Community Plans (OCPs), as enforceable legislation, are the foundation of stability for local frameworks. Typically, OCPs include vision or

goal statements, agricultural objectives, and specific policies for agricultural lands. The OCP is supported by the zoning bylaws, which provide regulations for designated agricultural land uses, thereby contributing to the stability of the framework. We found that the OCP for the RVCD area lacks clear language and commitment to protect farmland. Protecting farmland is not included in the overall goals of the plan. In a moderate way, the OCP states, as an objective, that the Regional District will support the general objectives of the ALC. The objectives and policies related to agricultural lands are moderate to weak, lacking in detail compared to other OCPs in northern BC.

Integrating policies and priorities across jurisdictions is a foundation for building cohesion across provincial, regional, and local governments. In order to successfully integrate policies across jurisdictions there must be sufficient details about the legislative context that guides and constrains local government plans and strategies. Overall, we found that the integration is a weak aspect of the local legislative framework. The OCP and other documents refer to basic elements of the provincial framework but lack breadth and depth.

The presence of uncertainty, typically introduced via ambiguous language, exceptions or gaps, is a critical measure of the weakness of an agricultural land use planning framework. Thus, in addition to maximising the stability of a legislative framework through enforceable policies, people want to know they can rely on these rules and regulations to be applied consistently under different circumstances. We found that the RDFFG does a good job of minimising uncertainty. The language is clear and consistent and there is a high level of consistency regarding agricultural land use planning among OCPs across the region. However, the RDFFG's support for non-farm uses in some parts of the region (e.g., the fringe areas of Prince George, McBride, and Valemount) does contribute to uncertainty about the Board's commitment to protecting its agricultural land base.

Creating an effective legislative framework is an act of balance, without being too stable so that it cannot be changed when needed or too strict so that it cannot be applied in a range of circumstances. Thus, flexibility is necessary in order to moderate the restrictive effects of maximising stability and minimising uncertainty. One means to accommodate flexibility is typically done through governance mechanisms. The RDFFG is unique with regard for governance because it signed a Delegation Agreement with the ALC that gives Regional Board the powers to decide applications for non-farm use or subdivision with respect to ALR lands within its jurisdiction. In exercising these powers, the RDFFG's decisions must be consistent with the objectives of the ALC Act and its regulations. An Agricultural Land Use Standing Committee performs the delegated duties of an Agricultural Advisory Committee for the whole region. In this capacity, the committee is able to consider agricultural land use decisions in a broader context and accommodate the needs of particular areas. The structure of the RDFFG OCPs also helps to accommodate flexibility within the framework, namely through Rural Communities and Special Management Area sections that set forth areas that require specific development and servicing policies.

In addition to assessing the strength of the local legislative frameworks, we assessed how issues, ideas, interests, and institutions associated with the three policy regimes influence local agricultural land use planning processes and decisions. The two policy regimes of farmland preservation and global competitiveness have influenced agricultural land use policy and legislation for over forty years. Food sovereignty, and its associated concerns with food security and demand for local food, is a nascent policy regime that is influencing agricultural land use

planning. To complete the assessment of the presence and importance of the policy regimes we examined the documents that comprise the legislative framework. We found that all three policy regimes are present, although none is of high influence. Farmland preservation is the most prevalent among RDIFFG policies, which focusses on the general need to preserve agricultural land from fragmentation and to mitigate impacts on agricultural lands. The other two policy regimes, although present, do not appear to have significant influence over agricultural land use planning in the region.

Overall Influence of Policy Regimes, Fraser Valley-Canoe Downstream

Policy Regime	Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Global Competitiveness				
Farmland Preservation				
Food Sovereignty				

Low
 Medium
 High

As the project unfolded, several issues emerged as common concerns across the study area. These were small-lot agriculture/fragmentation of farmland, alienation of farmland/foreign ownership, and pressure from natural resource developments. The RDIFFG faces all of these issues, but none appears to be of particular concern. Although the tension between a desire for small agricultural lots and for mitigating fragmentation exists within the RDIFFG, this matter is not significant across the region as a whole. A unique issue exists in Dunster, which is designated as a Special Management Area with explicit policies for minimising subdivision, preventing concentration of residential developments, and consolidating multiple holdings into larger parcels as a net benefit to agriculture. Local residents have expressed concern that this policy is limited the area’s development. Also, the opportunity for accommodating small agricultural holdings within the Prince George fringe area was raised in a review by the ALC. Although foreign ownership of land is not mentioned as an agricultural land use planning issue, the region has experienced corporations purchasing productive farmland and planting trees for carbon credits. Although this practice is somewhat isolated presently, its expansion is likely as it appears to be an issue throughout northern BC. Regarding natural resource developments, the OCPs include a Resource Management Objective and a Crown Land Objective that recognises and complements the efforts of the Province such that specific developments are consistent with RDIFFG policies. In contrast, more attention is given within the RDIFFG legislative framework to accommodating urban development in the fringe area of Prince George.

In summary, the legislative framework for protecting farmland within the Regional District of Fraser-Fort George is of moderate strength, with some weak elements. The RDIFFG demonstrates a high interest in supporting the agricultural sector across the region as part of its economic diversification. Within this context, protecting farmland is supported by the Regional District through its OCPs and bylaws, but farmland preservation is not recognised as a particular issue or priority. At the same time, the Delegation Agreement with the ALC requires the RDIFFG to protect all agricultural lands and encourage farming as the best use of these lands. Thus, there is some divergence between protecting farmland and keeping options open to pursue economic diversification.

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Abbreviations

AAC	Agricultural Advisory Committee
AIA	Agriculture Impact Assessment
APC	Advisory Planning Commission
ALC	Agricultural Land Commission
ALCA	<i>Agricultural Land Commission Act</i>
ALR	Agricultural Land Reserve
DPA	Development Permit Area
LGA	<i>Local Government Act</i>
LRMP	Land and Resource Management Plan
NFU	Non-farm Use
OBAC	Omineca Beetle Action Coalition
OCP	Official Community Plan
RDFFG	Regional District of Fraser-Fort George
RVCD	Robson Valley-Canoe Downstream
RVCU	Robson Valley-Canoe Upstream
SLUP	Strategic Land Use Plan
SRMP	Sustainable Resource Management Plan

About the project

The provincial project is a one-year study to identify principles and beneficial practices that represent land use planning solutions that protect farmland in northern British Columbia. We have three objectives related to this purpose:

1. To undertake case studies to fill strategic gaps in our understanding of how agricultural land use planning policies and processes at a local level protect farmland while also integrating public priorities across jurisdictions.
2. To analyse three inter-related policy regimes within Canada's agri-food system: the long-standing policy regimes of global competitiveness and farmland preservation; and the nascent regime of food sovereignty. The aim is to understand how these three policy regimes influence agricultural land use planning at local, provincial, and national levels of policy. A policy regime and its changes refer to the combination of issues, ideas, interests, actors and institutions that are involved.
3. To mobilise knowledge gained from the research by hosting workshops across northern British Columbia.

This project represents an extension of a national project to identify principles and beneficial practices that promote integrated land use planning solutions that protect farmland across Canada.

The relation between agriculture, food, and social priorities is connected to the society we want and the place of food and farmers within it. Historically, the decline in the economic and social role of agriculture has accompanied a significant loss and degradation of the agricultural land base. This trend appears to be reversing. The growth of the local food movement, as evident by the increasing number of farmers markets and citizen-based initiatives like community gardens and local food councils, has been the forerunner of recent calls at the national level for a Canada-wide food policy. Although drastic policy changes are not likely to happen immediately at the national level, changes are already occurring at local and regional levels, with all of Canada's major metropolitan regions having launched food plans and policy councils (Vancouver, Calgary, Toronto, Ottawa and Montreal). These changes suggest that the place of agriculture and food within Canadian society has shifted to be much more aligned with public priorities.

Sorting out relations between agriculture, food, and society falls, in part, within the domain of land use planning because every act of producing and consuming food has impacts on the land base. Yet, in spite of forty years of farmland protection policies, the agricultural land base still faces growing pressures from urban development and the pursuit of other economic priorities, with few indications that this trend will be significantly curtailed. Will this trend be halted if Canada adopts a national food policy that gave citizens more influence over domestic food supplies? If Canada adopted such a policy, do governments have the ability to protect the agricultural land base in order to support these new public priorities?

Unlike the urban centres of BC where the greatest pressures on farmland are from urban development, some pressure on agricultural lands in northern BC comes from the development of natural resources, such as forestry and oil and gas. The Site C dam is another source of pressure. Likewise, most of the studies to examine the effectiveness of farmland protection policies have focussed on the pressures from urban development. Recognising that the results of

these studies are not fully transferable to northern BC, this project aims to assess the state of agricultural land use planning in this area of the province.

We anticipate that the greatest potential benefit of the research is to make a positive contribution to the development of agricultural land use plans, planning processes, and policies in northern BC to protect farmland and promote farming as the highest and best use of these lands. Our assessment will be of benefit to land use decision makers, planning practitioners, to non-government organisations, industry groups, farmer organisations, farmers, and the general public.

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Principles for guiding agricultural land use planning

An agricultural land use planning legislative framework provides the context and constraints for what local governments must and can do to protect its agricultural lands. An effective framework of policies, legislation, and governance structures presents an opportunity for local governments, which can then choose how much it wants to take advantage of this opportunity. Within this context it is helpful to be able to assess the quality of an agricultural land use planning framework and understand how well it works and why. For this purpose we have identified the following four principles, which are described below:

- Maximise stability
- Minimise uncertainty
- Integrate across jurisdictions
- Accommodate flexibility

The concepts of stability and uncertainty must be understood with a view of the world as unpredictable and essentially unknowable. This contrasts with a rationale view of the world as something that we can understand fully – if only we had all of the right data and the ability to process the information. This worldview of an open future presents challenges because planning, by its very function, is focussed on making a desirable future a visible part of today's land use decision-making processes (Connell, 2009). The aim of planning is not to predict the future or claim to be all-knowing but to envision a desirable future with the information available. The functions of planning are to maximise what we can know about the future and to minimise what we do not know, thereby establishing a domain of understanding within which to make the best possible land use decisions in the present. This leads to the first two principles of agricultural land use planning.

Maximise stability

Something that is stable is difficult to topple; it stands strong and cannot be easily moved. Likewise, a stable legislative framework for protecting farmland is one that is not easily changed at the whim of shifting political interests; it is well-entrenched in acts of legislation, policy, and governance structures that are based on clear, concise language, and can hold up to court challenge. It is something that people can count on to secure the land base for agriculture and to know what the rules are. In this sense, a measure of stability is a measure of the thing itself – the legislative framework – as it is written in its present form. Thus, stability is a critical measure of the strength of an agricultural land use planning framework.

Minimise uncertainty

In addition to maximising the stability of a legislative framework through clear rules and regulations we must also consider how the framework will be implemented and applied to land use decisions. People want to know they can rely on these rules and regulations to be applied consistently and to know how it will be applied under different circumstances. In this sense, people want not only a stable land base for agriculture but also a legislative framework that provides some certainty about how it will be used to make agricultural land use decisions. However, what we do not know is boundless so we must accept that we cannot eliminate uncertainty. What governments can do is to minimise uncertainty by eliminating loop-holes, ambiguous language, and open-ended conditions. Perhaps more importantly, uncertainty can be minimised through consistent interpretations and applications of the legislative framework. In this sense, a measure of uncertainty is a future-oriented measure of expectations about how the legislative framework will be applied to land use decisions. Thus, the presence of uncertainty is a critical measure of the weakness of an agricultural land use planning framework.

Integrate across jurisdictions

Integrating policies and priorities across jurisdictions is a foundation for building cohesion across provincial, regional, and local governments. This principle of integration can be viewed as a “policy thread” that weaves together traditional areas of responsibility (Smith, 1998). One can also think of integration as a formal “linkage” between policies that provides consistency among them. Such formal linkages can come in the form of a provincial policy that requires a lower-level policy “to be consistent with” provincial statements. The aim of such vertical mechanisms is to ensure that lower-level policies are set within the context of broader public priorities. The same principle of integration applies horizontally, too, so that plans and strategies are coordinated and consistent across local governments. In order to successfully integrate policies across jurisdictions there must be sufficient details about the legislative context that guides and constrains local government plans and strategies.

Accommodate flexibility

Creating an effective legislative framework is an act of balance without being too stable so that it cannot be changed when needed or too strict so that it cannot be applied in a range of

circumstances. Thus, flexibility is necessary in order to moderate the restrictive effects of maximising stability and minimising uncertainty. The principle is to enable decision-makers to accommodate a controlled level of flexibility without compromising the primary functions of the legislative framework to provide stability and reduce uncertainty. The means to accommodate flexibility is typically done through governance mechanisms, such as quasi-judicial provincial commissions, advisory committees, and application processes.

Strength of BC's provincial legislative framework

British Columbia's legislative framework is very strong. The act of legislation to establish a land reserve of all farmland and a quasi-judicial tribunal provides the highest level of stability. As Barry Smith (1998) stated, "A stable ALR is the cornerstone of planning for agriculture; heightening certainty for persons engaged in farm businesses and support industries." Important elements within the legislation include a clear mandate for the ALC that is focussed specifically on protecting farmland. This primary focus has withstood the test of time over forty years in spite of changing governments. The additional legislation to protect farm practices extends this stability to areas of land use conflict. The strong language in the legislation that local government plans must be consistent with the ALC Act provides a necessary link in order to extend the provincial legislation into the domain of local land use planning and decisions.

There are, however, several factors within the farmland protection framework that undermine stability and contribute to uncertainty. The most influential tool that has been used by provincial governments to introduce new elements to the legislative framework has been the Ministry of Agriculture's annual service plan for the Agricultural Land Commission. Annual Service Plans have been used to introduce new factors (e.g., community need and regional responsiveness) that compromised the ALC mandate to protect farmland as a matter of provincial interest. As Gary Runka stated, "Somehow, during the mid-1990s, uncertainty of purpose and direction crept in to both the administration and the perception of BC's agricultural land preservation program" (Runka 2006:5). At other times the service plans have also been used to re-inforce the legislated mandate.

The use of regional panels within the ALC has been a source of uncertainty within the legislative framework. Until 2014 the use of the ALC panels, as per the ALC Act, was at the discretion of the ALC Chair. Over the years the level of influence of regional panels in ALC decisions has shifted. In the 2002 annual service plan, the concepts of "regional representation" and "community need" were formally inserted into the ALC practices. In the following years the influence of the regional panels was strengthened. And, as noted in the 2007 service plan, the number of applications to the ALC for land use changes "increased significantly." Effectively, the greater level of influence of regional and local interests compromised the mandate of the ALC, thereby changing expectations and introducing a greater level of uncertainty about how the ALC Act would be applied. In 2010, the ALC Chair made changes to return to a more centralised decision-making process that re-focusses on protecting the agricultural land base as a mandate of provincial interest. However, in May, 2014, the ALC Act was amended through Bill 24, which was passed on May 29, 2014. These changes were preceded by statements by BC's Premier in the summer of 2013 that the ALC Act would be reviewed and subject to change. There were three main changes to the ALC Act:

- The ALR was divided into two zones

- The criteria for agricultural land use decisions in Zone 1 were not changed
- The criteria for agricultural land use decisions in Zone 2 were changed and introduced additional factors that the ALC must consider when making decisions (e.g., social, economic, cultural, and heritage values)
- The regional panels were now required, as opposed to being at the discretion of the ALC Chair
- The level of direct political involvement was increased through the power to appoint members to the ALC (in some cases without consultation with the ALC)

The most significant changes affect Zone 2 for which the mandate of the ALC to protect farmland has changed. This change has undermined the stability of the legislative framework and introduced uncertainty about how the new criteria will be applied has also increased.

Another important weakness of BC's agricultural land use planning concerns foreign or out-of-province ownership of land. Presently, BC has no restrictions on foreign ownership of agricultural land, regardless of whether it is in the ALR or not. Foreign ownership of agricultural land increases the possibility that farmland will be alienated.

The provincial legislative framework in BC, like most farmland protection policies, is focussed on planning for agricultural land use in the face of urban development and private land. Correspondingly, both the legislation and the supporting materials are directed at integrating provincial policies and legislation with urban land use planning tools of local governments, such as Official Community Plans, implementing bylaws (e.g., zoning regulations), and Regional Growth Strategies. In contrast, planning for agriculture in the face of natural resource developments, usually but not exclusively on Crown land, is largely undeveloped. Regional Growth Strategies are valuable planning tools that can help address natural resource developments, urban development, and farmland protection; however the absence of legal strategic land use planning constrains the development of agricultural land use planning at the regional scale.

Although the provincial legislative framework in BC is strong overall, there are two practices associated with how the framework is used that compromise this strength. First, the decision-making process has been driven by applications to change land uses. The ALC Act provides a mechanism for land owners, including governments, to apply to the ALC to exclude or include land in the ALR, to approve subdivisions, and to permit non-farm uses. As recognised in a review of the ALC in 2010, these applications have dominated the activities of the ALC with the direct consequence that the ALC had limited time and resources to dedicate to working with local governments to strengthen land use policies in order to protect farmland. Second, although there is no specific policy that treats each local government differently, the practice of working with local governments to develop land use plans is based on the principle of flexibility. That is, the ALC recognises that the geography of the province is very diverse and that local government plans can – and should (Smith, 1998) – be developed to accommodate this diversity. However, this practice of flexible planning leads to significant differences among local government plans with regard to the level of commitment to protecting farmland, with some plans being inconsistent with the mandate of the ALC Act to protect all farmland.

Finally, the ALC recently expressed a strong interest to dedicate more resources to encourage farming and its viability. These complementary activities to protecting the land base were present when the land reserve was first established in 1973. However, the programs were

eliminated soon thereafter. Such programs serve indirectly to protect the agricultural land base by increasing the demand for the land itself as productive farmland.

Political context and policy regimes

To understand how political contexts and multiple public priorities influence agricultural land use planning in Canada, and to what extent it has already had an impact, we will examine the interaction of three current policy regimes: global competitiveness, farmland preservation, and food sovereignty. A policy regime and its changes refer to the combination of issues, ideas, interests, actors and institutions that are involved. Actors of agricultural policy regimes include a wide range of interests represented by citizens, all levels of government, local organisations, professional organisations representing producers, farmers and ranchers themselves, unions, industry trade associations and environmental groups, among others. In Canada, the two policy regimes of global competitiveness and farmland preservation have influenced policies for several decades. The recent emergence of food sovereignty as a policy regime reflects growing public concerns about the security and safety of Canada's domestic food supply, and may have significant implications for Canada's global competitiveness and the conservation and use of agricultural land. In this section we described each of these three policy regimes. A description of the criteria we used to determine the level of influence of each policy regime is provided in the appendix.

Global competitiveness

A policy regime of global competitiveness has strengthened over the past forty years at both the national and provincial levels, usually in the context of pressures on industry viability in the face of freer trade. An interest in global competitiveness often requires policies and strategies to successfully integrate into the global economy. A recent report on competitiveness by the House of Commons Standing Committee on Agriculture and Agri-Food focussed on access to new markets, barriers to trade, food safety and product labelling, and market concentration within sectors. Input to this report was provided by national and regional commodity trade associations, meat and other food processors, transportation associations, and policy institutes, among others. Scholars in this field, such as Grace Skogstad, have noted that, although the membership of the agri-food policy community in Canada is strong individually, the community is nationally fragmented and organisationally divided, as national policies do not always serve all members or geographic regions equally. For example, export-oriented policies may promote the export of raw food products at the risk of higher prices for domestic food processors. Such policies also have regional differences, where policies may benefit one region (food processing in central Canada) to the disadvantage of food producers in another region (food producers in the prairies). Notwithstanding these internal challenges, the competitiveness policy regime continues to strengthen, as evident in the Growing Forward 2 (GF2) policy framework announced on September 14, 2012.

Key ideas from GF2:

- Competitiveness and Market Growth: The sector needs to continually increase productivity, to reduce costs and to respond to consumer demands, such as for high-

value products with specific attributes. Competitiveness also means increasing our share of domestic and international markets.

- The key drivers are:
 - o Innovation: The sector adopts and implements new technologies and innovations, creating and using knowledge to develop new products, technologies and business management practices that drive down costs, increase productivity and respond to consumer demands.
 - o Institutional and Physical Infrastructure: Effective rules, regulations, standards, organizations, and physical infrastructure allow firms to operate and markets to function efficiently for a profitable sector and the well-being of Canadians.
- Competing on cost: One factor in assessing the competitiveness of Canadian agriculture and agri-food sector is how cost-efficient Canadian agricultural producers, manufacturers and exporters are in relation to competitor suppliers. This is influenced by a number of factors, including natural resource availability and use, input prices, labour availability and cost, and scale of operation.
- Innovation is critical for improved cost competitiveness. Innovation can lead to improved productivity and reduced costs. However, despite significant agricultural research, the sector could be more effective in applying knowledge and innovating along the supply chain.
- Focus on the role of innovation for productivity growth and the ongoing efforts to access emerging growth markets.
- Continual innovation and adaptation has contributed to increased yields and the creation of new products and production methods
- Increased trade, globalization of supply chains, and more exacting consumer demands have increased the importance of rules, regulations, and other market infrastructure
- Additional industry capacity and infrastructure investments, such as information and communication technologies, will be required to enable producers, processors, buyers, and government agencies to adjust effectively to new food safety regulations and buyer assurance standards.
- Bilateral and multilateral trade agreements and trade promotion efforts are essential.

Food sovereignty

For our purposes, food sovereignty is a broad term that focusses on the right of citizens to have greater control over its food supply. The term encompasses food security and food safety. Food security is concerned about the availability, accessibility, and affordability of food.

While the control of food supplies were among the earliest drivers of nation-building and human settlements, food sovereignty, as defined by the International Planning Committee for Food Sovereignty, is about the right of peoples to define, protect and regulate domestic agricultural production and land policies that promote safe, healthy and ecologically sustainable food production that is culturally appropriate. Within Canada, the growth of the local food movement, as evident by the increasing number of farmers markets and citizen-based initiatives like community gardens and local food councils, has been the forerunner of recent calls for citizens having greater control over national agri-food policies. The National Farmers Union, Canadian Federation of Agriculture, and Food Secure Canada are some of the national actors

calling for changes. Adopting agri-food policies that promote greater food sovereignty could easily reach into people's daily lives, with economic, social and environmental implications, both positive and negative. Such policy will be regarded quite differently depending on a person's values and priorities, and where agriculture fits among them.

Farmland preservation

Different terms are used in this policy regime including farmland conservation, farmland preservation, and farmland protection. For our project we will use farmland protection and farmland preservation in two specific ways:

- Farmland protection: a narrower term that we will use to refer specifically to land use planning policies that aim to *protect* farmland so that it is available for farm uses; we will use farmland protection in relation to the contents of a legislative framework.
- Farmland preservation: is a broader term that concerns all aspects of policies related to farmland including policies that not only protect farmland but are also concerned with soil and landscape conservation, etc.; can be synonymously with farmland conservation; we will refer to all that is related to farmland preservation as a policy regime.

As a policy regime, preserving farmland first garnered serious public attention in Canada in the early 1970s with most provincial and local jurisdictions having some form of legislation or guidelines in place by the end of the 1970s. The historical development of farmland policies in Canada were accompanied by a wide range of economic, environmental, and social issues that were associated with and re-inforced tensions among different land uses, such as residential, commercial, industrial, and natural resource development.

Correspondingly, motivations for preserving farmland are influenced by factors such as food production, market value for land, environmental issues, amenity of rural landscapes, agrarian ideals and land use conflicts on the urban fringe. In spite of efforts over the past forty years, Canada has experienced a continual loss of prime farmland across the country. The issue is especially acute in Ontario, which contains the country's largest supply of prime agricultural lands, but concerns for the preservation of farmland exist across the country, albeit to varying degrees. But is also acute in other jurisdictions due to a much more limited and declining agricultural land base, such as in British Columbia and Quebec.

Concern about the loss and fragmentation (parcelisation) of farmland continues to be an issue in the face of continued urban sprawl and alienation of farmland (i.e., farmland that is not being farmed or no longer suitable for farming). These issues often lead to further problems, such as conflicts or tension with residential, recreational, infrastructure, and industrial land uses. Loss of farmland is often associated with concerns about the supply of local food and, increasingly, it is concerned with "land grabbing" through foreign or out-of-province ownership of land.

Introduction

Purpose and scope of study

In this report we present the results of a study of agricultural land use planning in the Regional District of Fraser-Fort George (RDFFG), a large geographic area located in central interior British Columbia. This case study contributes to three areas of knowledge. The study is part of a national project to identify principles and beneficial practices that represent land use planning solutions that protect farmland. For our purposes, the study contributes to an understanding of the state of agricultural land use planning in northern British Columbia (BC). Finally, the study lends insight to the state of agricultural land use planning in the RDFFG.

To assess the region as a whole, we examined the breadth and quality of four local legislative frameworks that govern agricultural land use planning, including policies, legislation, and governance. To gain further insights, we examined the local legislative framework of Robson Valley-Canoe Downstream area, which is part of Electoral Area H, as a case study site. For the case study, we assessed the strength of the local framework for agricultural land use planning using four principles as criteria: maximise stability, integrate public priorities across jurisdictions, minimise uncertainty, and accommodate flexibility. The case study also involved an assessment of the political context within which agricultural land use planning takes place and decisions are made. This part of the assessment included documentation and analysis of three policy regimes: farmland preservation, global competitiveness, and food sovereignty.

Methods

Legislative framework:

The methods used to complete the preliminary assessment involved several activities:

- Document agricultural land use planning legislative framework:
The legislative framework consists of policies, legislation (and by-laws), and governance structures related to agricultural land use planning at local, regional (or upper-tier), and provincial levels of government. The policies and legislation were identified as enforceable, aspirational, or enabling. Refer to the appendix for definitions of these and other terms.
- Content analysis of legislative framework documents:
After identifying the relevant documents the next step was to analyse the level of detail of each document's contents. The aim of the content analysis is to assess the breadth and quality of the legislative framework.

Political context:

- Policy regimes
We analysed the contents of documents with regard for the presence and importance of policy regimes. The documents included those identified in the legislative framework. The aim is to assess the extent to which agricultural land use planning accommodates the three policy regimes, influences land use decisions, and encompasses a comprehensive view of food systems planning, activities, and issues.

Overview of site

The RDFFG (Figure 1) is located in the central and central-east interior of British Columbia (BC). The Regional District has a population of 91,879, which is down slightly from 2006, and a jurisdictional area of 51,083 km² (Census Profile 2011). The RDFFG includes the four member municipalities of City of Prince George, District of Mackenzie, Village of Valemount, and Village of McBride. It also includes seven electoral areas, as follows:

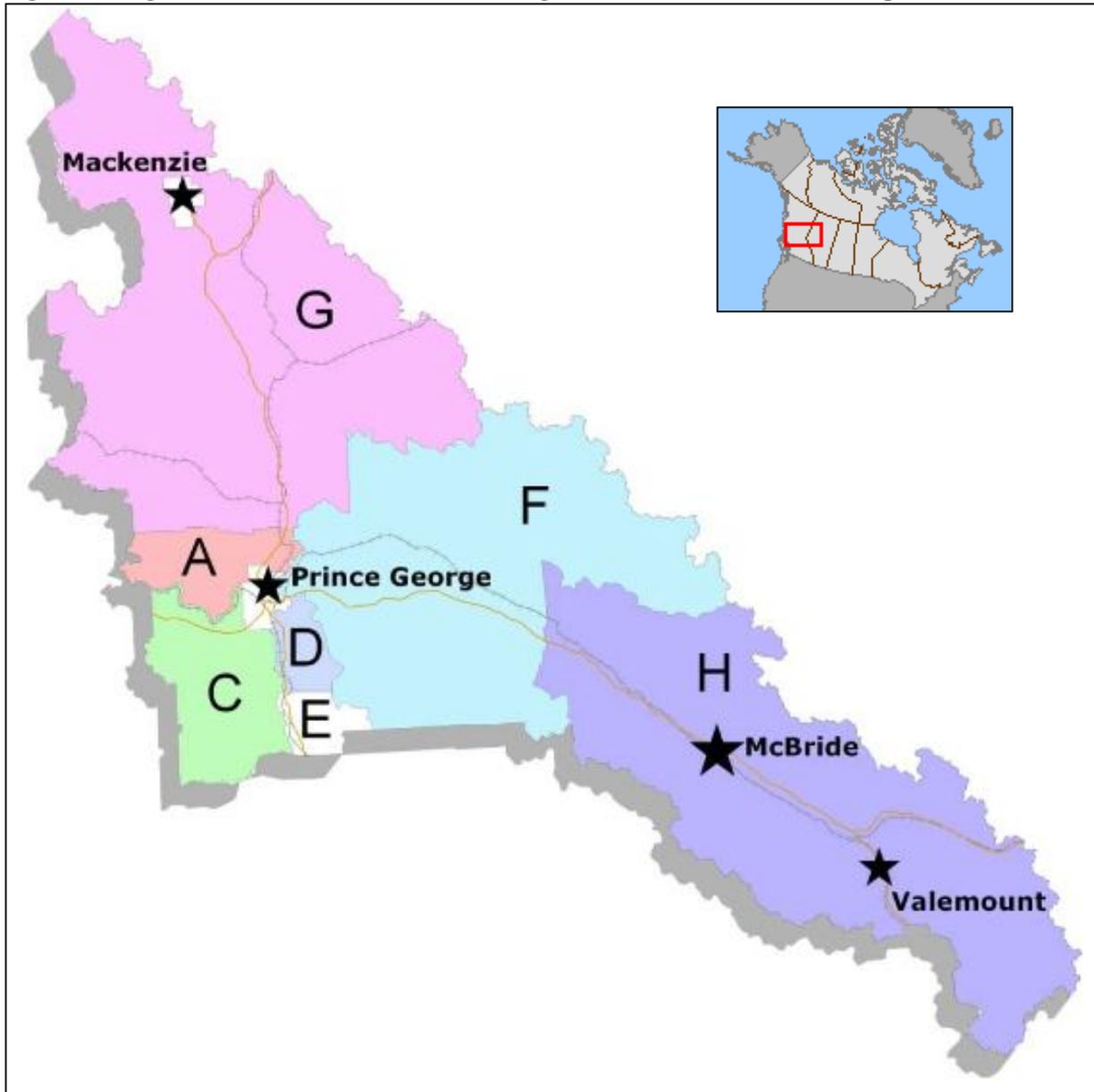
Fraser-Fort George A - Salmon River & Lakes
Fraser-Fort George C - Chilako River-Nechako
Fraser-Fort George D - Tabor Lake-Stone Creek
Fraser-Fort George E - Woodpecker-Hixon
Fraser-Fort George F - Willow River-Upper Fraser
Fraser-Fort George G - Crooked River-Parsnip
Fraser-Fort George H - Robson Valley-Canoe

There are three Indian Reserves within the boundaries of the RDFFG, but not under its jurisdiction, including the following: Fort George (Shelley) Indian Reserve No. 2; McLeod Lake Indian Reserve No. 1; and Parsnip Indian Reserve No. 5.

The region has a diverse economic base, although, given its large geographic area and dispersed settlements, some areas are more dependent on single industries than others. Overall, economic sectors include forestry, mining, manufacturing, education, transportation, tourism, and public services. Most people are employed in the service sector, followed by manufacturing, and retail trade. These numbers reflect the dominance of the urban centre of Prince George. The rural areas of the region are less diverse where forestry has been the most important base sector, as well as mining, agriculture, and tourism industries. The forestry sector has experienced a significant decline in recent years and faces challenges related to the expected reductions in the timber supply caused by the mountain pine beetle infestation, which devastated much of the region's lodgepole pine forests. About 2,500 people are employed in the agricultural sector, which is primarily ranching and forage.

Since 2002, the RDFFG has operated under a Delegation Agreement with the ALC, which delegates some authority of the ALC to the RDFFG. Under this Agreement, the RDFFG reviews applications for subdivisions and non-farm uses of ALR lands within its jurisdiction on behalf of the ALC. In 2012, the ALC completed a review of the Delegation Agreement. We summarise the results of this report below.

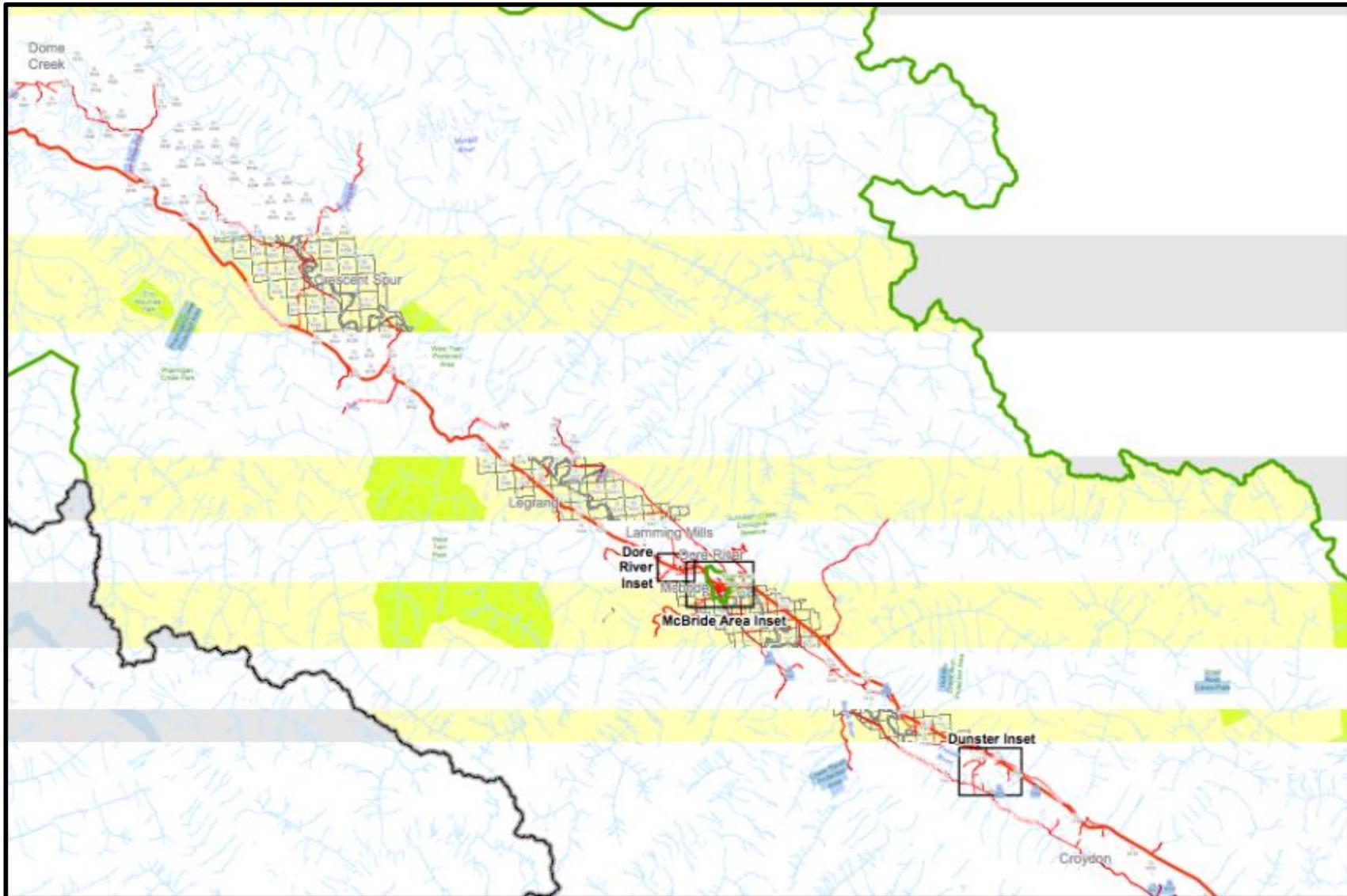
Figure 1. Regional District of Fraser-Fort George Electoral Areas and Municipalities.



Source: RDFFG (2015)

To make our content analysis of the legislative documents more manageable, we focussed on a sub-area of the RDFFG. For this purpose selected the Robson Valley-Canoe Downstream area, encompassing the settlements of Dome Creek, Crescent Spur, the Village of McBride, Dunster, and others, which covers the northwest portion of Electoral Area H, shown in Figures 1 and 2. The area follows the Fraser River through the Yellowhead Pass to the base of Mount Robson. The area has a total population of 2,251 (Census Profile 2011). However, the population has decreased over the previous five years by -11.3%. Early industrial practices in the region included railway development, forestry, and agricultural operations. All of these industries are still prevalent, as well as an expanding tourism industry.

Figure 2. Robson Valley-Canoe Downstream Area

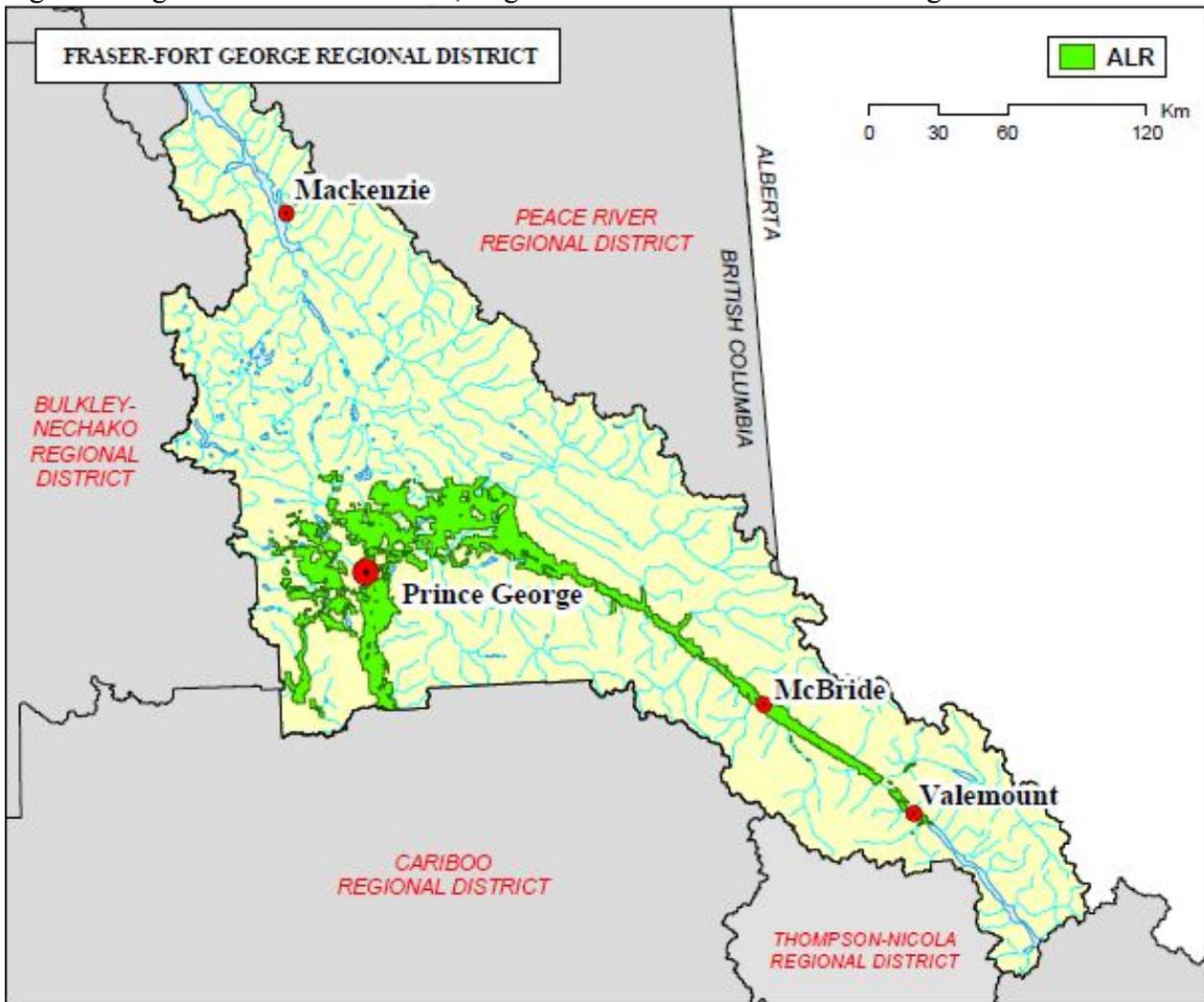


Source: RDFFG <http://www.rdffg.bc.ca/government/membership> (accessed December 6, 2014).

Agricultural profile

Agriculture in the region is characterised by the beef cattle industry and supporting forage production, with some opportunities for other food production. The area encompasses 389,711 ha of Agricultural Land Reserve (ALR), which is 7.5% of the total land area of RDFFG (Figure 3).

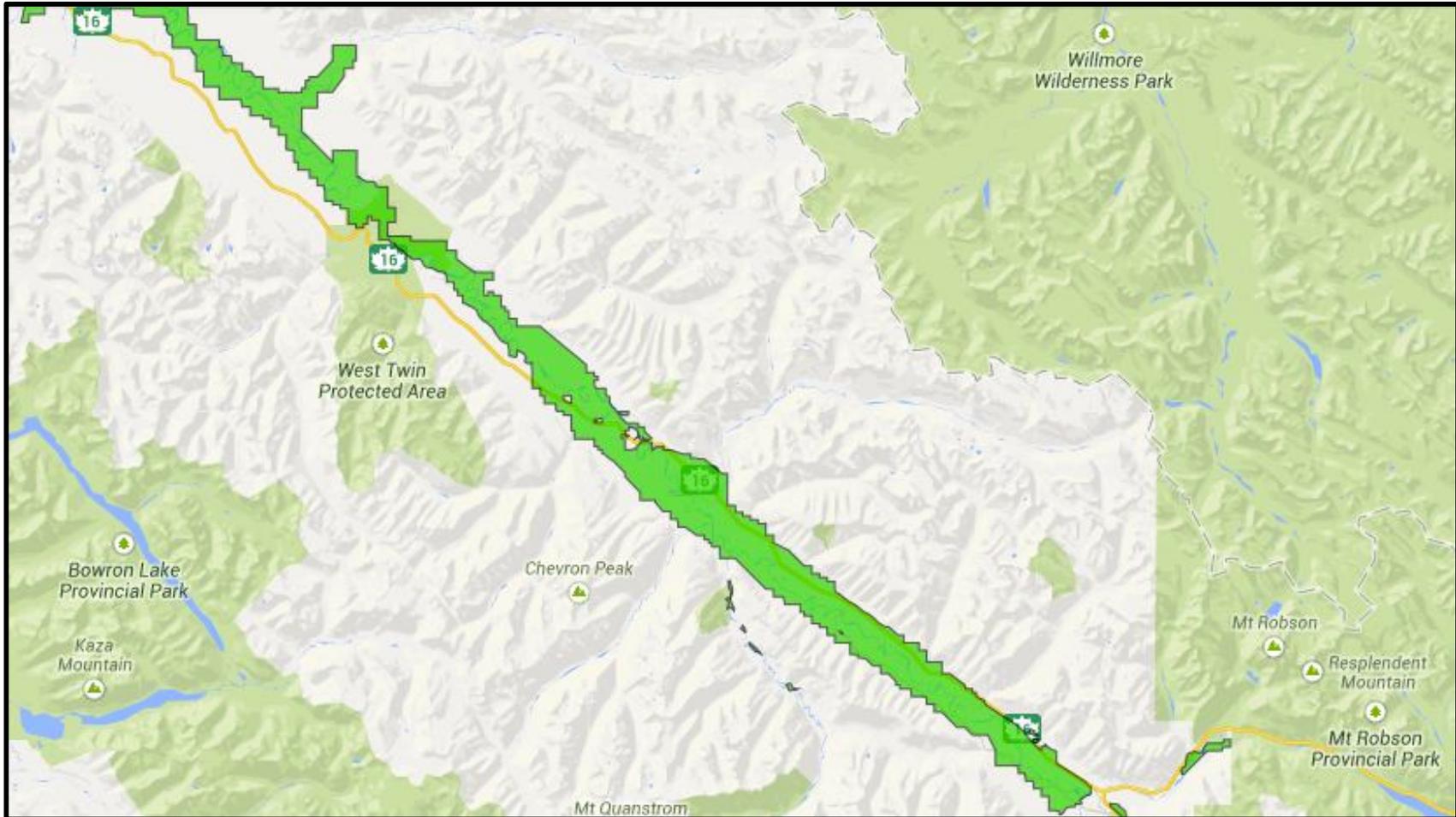
Figure 3. Agricultural Land Reserve, Regional District of Fraser-Fort George



Source: Agricultural Land Commission (ALR as of 2008), in Ministry of Agriculture and Lands (2008)

The arable farmland of the Robson Valley-Canoe Downstream area is located mostly at the bottom of the valley between the Rocky Mountain and Cariboo Mountain ranges. These agricultural lands correspond with the ALR lands shown in Figures 3 and 4. Farm operations include hay farming, cattle ranching, and horse and other equine production. In addition to this, the long summer season days support crops such as kale, cabbage, garlic and other root vegetables. However, the winter season is cold with a large amount of snow, resulting in shorter growing seasons compared to southern regions in the province.

Figure 4. Agricultural Land Reserves in Robson Valley-Canoe Downstream Area



Source: Agricultural Land Commission-Maps and GIS: ALR Mapping Tools

<http://www.alc.gov.bc.ca/alc/content.page?id=6B5539619F644D0D952A669284B4186#> (accessed December 7, 2014).

According to the 2011 Census of Agriculture, there are 558 farms and 830 farm operators in the RDFFG. As shown in Table 1, these farms are distributed throughout the region, with 121 farms with 180 operators in Area H. The number of farms in the Regional District rose between 1986 and 1996, with a peak of 650 farms, but has declined over the past fifteen years (Table 2).

Table 1. Farms and Farm Operators, Regional District of Fraser-Fort George, 2011

	Farms	Operators
Fraser-Fort George	558	830
A	113	165
B	nd	nd
C	133	195
D	121	185
E	33	55
F	37	55
G	nd	nd
H	121	180

Source: Census of Agriculture 2011

Table 2. Number of farms, Regional District of Fraser-Fort George, 1986-2011

	RDFFG
1986	562
1991	577
1996	650
2001	629
2006	621
2011	558

Source: Census of Agriculture

In 2009, a comprehensive economic development strategy was completed for the agricultural sector in the Omineca region (OBAC, 2009), which covers the area along Highway 16 between Valemount and Smithers, plus north to Mackenzie. The Omineca region includes all of the RDFFG and the Regional District of Bulkley-Nechako. The aim of the project was to help the regional economy diversify as a response to the negative impacts of the mountain pine beetle infestation. Strategic plans were developed for several key industry sectors, including agriculture, for which the aim was to strengthen and diversify the sector. Several opportunities were identified, including the following:

- Diversifying the beef industry through such means as location much more of the value chain in the region, supplying more beef to local markets, and developing grass-fed or forage-finished beef.
- Improving the viability of ranches by producing agroforestry or other crops to complement beef production.

- Expansion of storage and processing facilities to facilitate more emphasis on local and provincial markets, including slaughter and other processing facilities.
- Growing interest by consumers in locally-produced food as an outcome of a greater awareness of the benefits of improved food security, better health, reduced transportation impacts, and better profits for farmers able to sell directly to consumers
- Development of niche, specialty and value-added markets that avoid direct competition with commodity markets.
- Improved linkages to health and education programs in order to address food safety issues.
- Healthy and environmentally-responsible farming practices reflect a growing concern and interest among some area growers.

Some major challenges were also identified. At the time, ranching had not been profitable for a number of years. The level of profitability has since improved, although challenges still remain. Limited support for new product and market development and business planning were also identified as challenges. Finally, an ageing work force is a particular challenge in an area that has not been attractive to younger people who want to farm, primarily due to low profit levels and high risk.

Results

In this section, we present the results for the study of the RDFFG. We begin with our assessment of the state of agricultural land use planning, assess the legislative framework, and present the results of our content analysis. For the latter, we present the results of the content analyses of the Robson Valley-Canoe Downstream policies and legislation followed by the results of our assessment of the influence of the three policy regimes (farmland preservation, food sovereignty, and global competitiveness).

State of agricultural land use planning

To help understand the state of agricultural land use planning in the RDFFG we examined several related activities. We reviewed the ALC's report on their evaluation of the Delegation Agreement, the RDFFG position on amendments to ALCA, and RDFFG's recent decision regarding regional agricultural planning.

ALC Review of Delegation Agreement

In 2002, by agreement, the ALC delegated to the RDFFG the powers to decide applications for non-farm use (NFU) or subdivision with respect to ALR lands within its jurisdiction. In exercising these powers, the RDFFG's decisions must be consistent with the objectives of the ALC Act and its regulations, as well as the RDFFG's approved OCP and bylaws.

In 2013, the ALC completed a review of all delegated decisions made by the RDFFG between 2002 and 2012, covering 127 applications (Chart 1). The aim was help ensure that decisions made under the Agreement were protecting agricultural lands and encouraging farming. The review was based on an analysis of the number, type, and outcome of the decisions made by the RDFFG Board. The ALC also compared these decisions against the potential decisions that the ALC would have made if the Delegation Agreement was not in place. In this section, we highlight some of the results of the review. All of the data are from the ALC report (2013).

Of the total 127 decisions, 113 applications (89%) were approved and 14 were refused (11%) (Chart 2). Although this level of approvals may seem high, the ALC notes two reasons for why these results are expected: the RDFFG makes decisions only on applications that are submitted in accordance with OCP provisions; RDFFG staff may have actively discouraged applications that were unlikely to be approved.

The 127 applications were categorised by two types: 89 (70%) were for subdivision and 38 (30%) were for non-farm uses (NFU) (Chart 3). Most of the subdivision applications (76 or 85%) were approved, while 13 applications (15%) were refused.

Chart 1. Number of delegated decisions: Total applications processed (2001-2012)

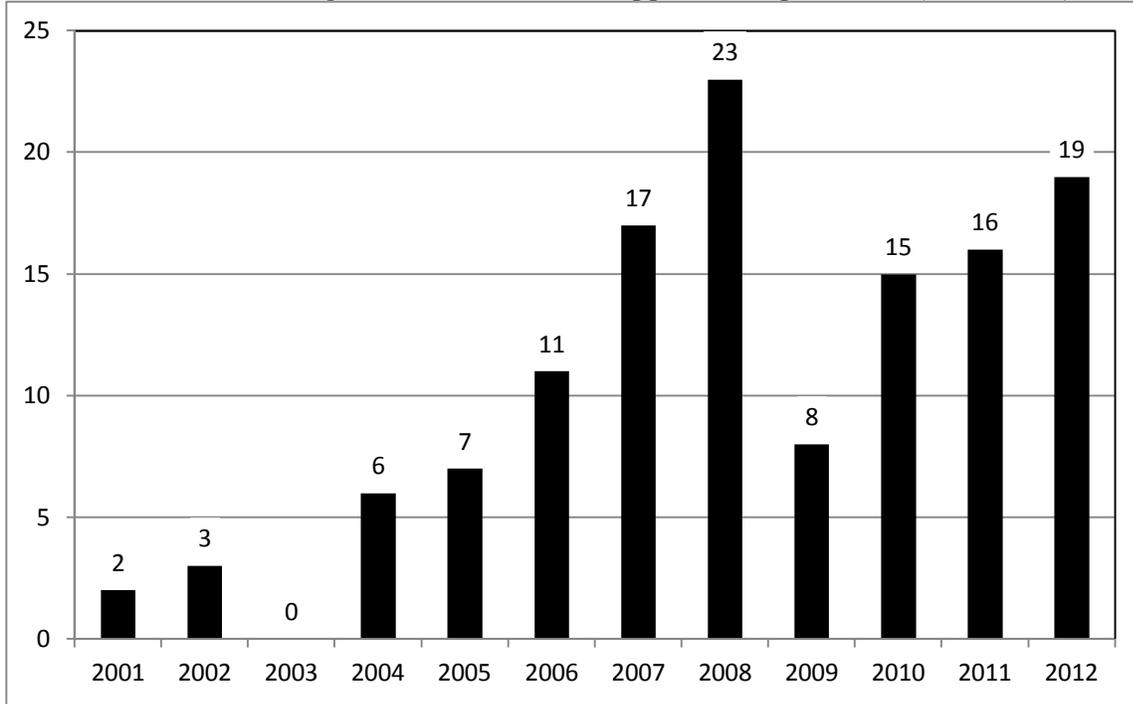


Chart 2. Total application approvals versus refusals (2001-2012)

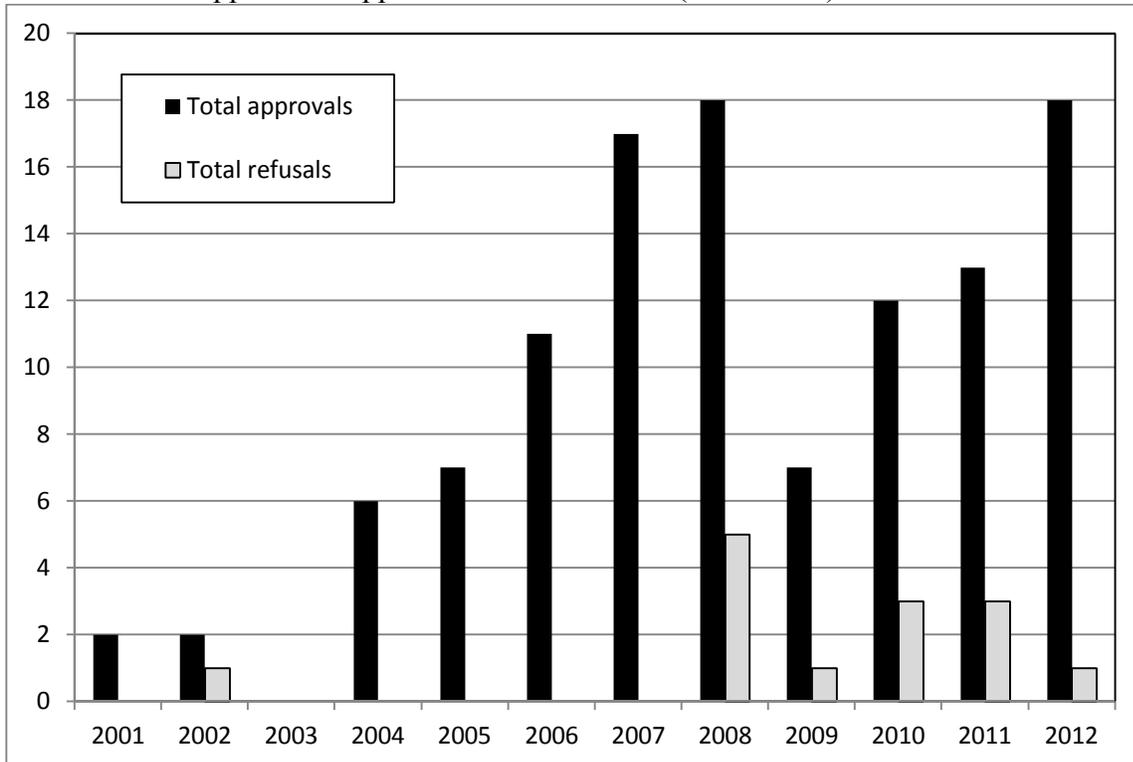
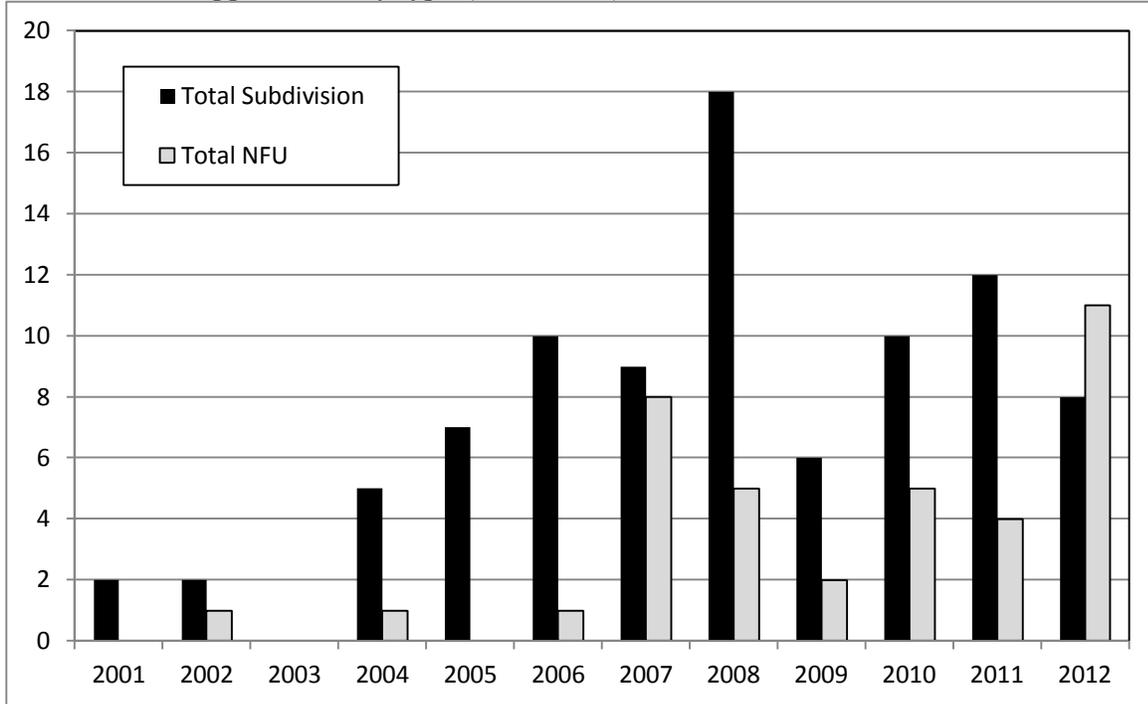
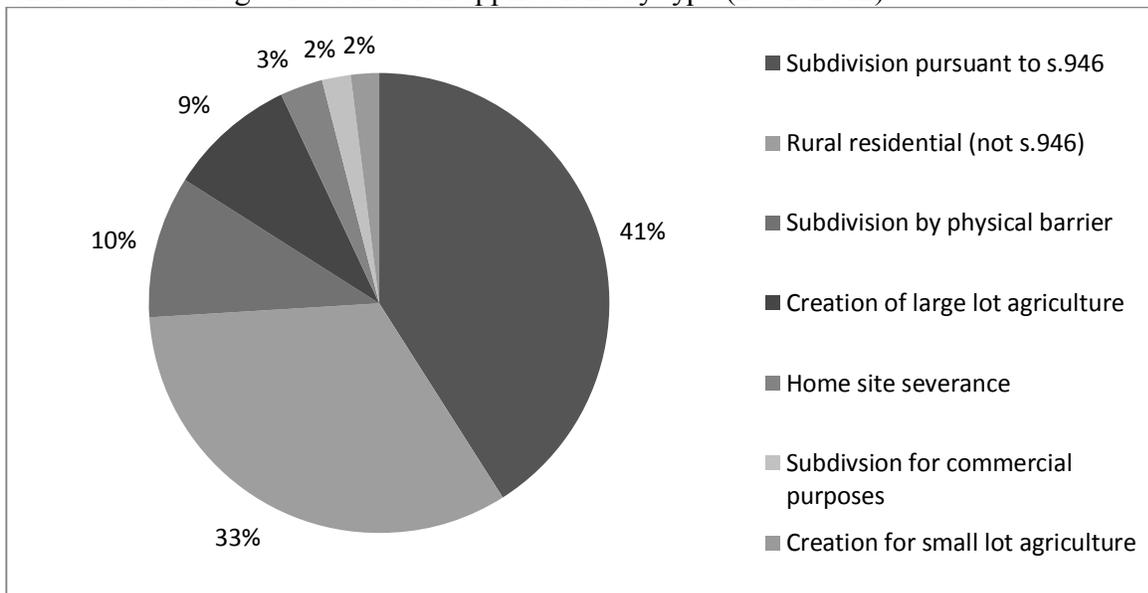


Chart 3. Total applications by type (2001-2012)



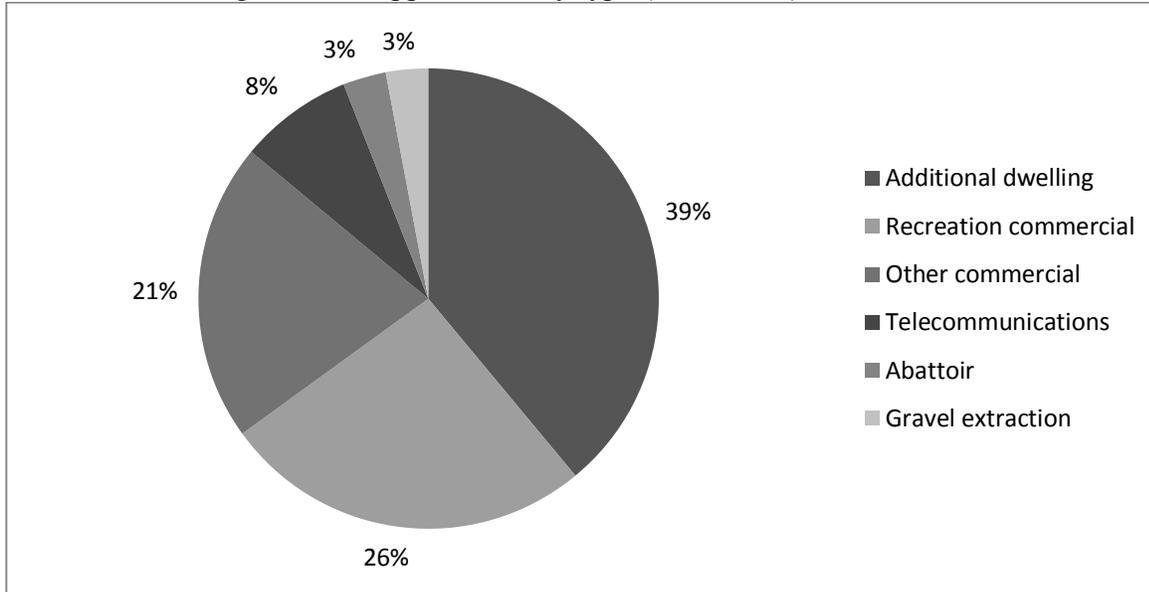
Of the subdivision applications, the greatest number (36 or 41%) was submitted under Section 946 of the *Local Government Act* (LGA s.946) (Chart 4). Most of these applications for subdivision (29 or 81%) were approved.

Chart 4. Percentage of subdivision applications by type (2001-2012)



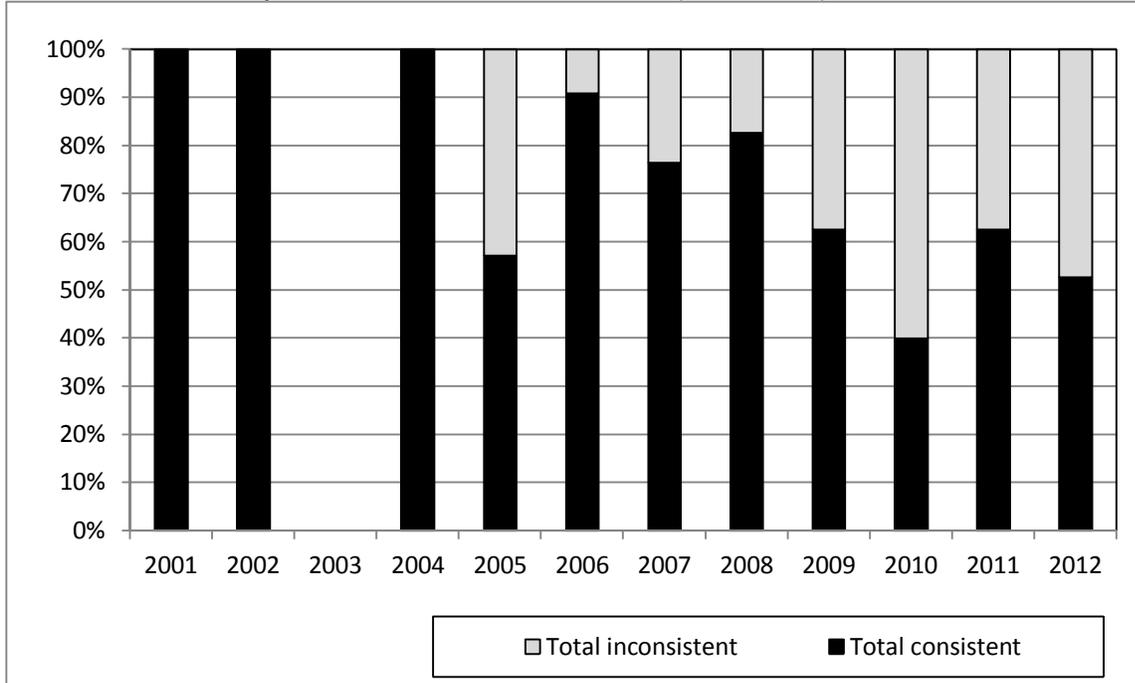
The greatest number of NFU applications reviewed by RDFFG was for an additional dwelling (39%), followed by 26% for recreational commercial uses (e.g., RV parks, campgrounds) (Chart 5). Other NFU applications were for commercial purposes (logging truck company, log storage, machinery repairs, highway commercial, storage/warehouse and towing company). Other NFU applications were for All but one of the NFU applications were approved.

Chart 5. Percentage of NFU applications by type (2001-2012)



The ALC also assessed the level of consistency between decisions made by the RDFFG and potential decisions that would have been made by the ALC if a delegation agreement was not in place. The ALC determined that 88 (69%) applications were considered to be consistent, and 39 (31%) were considered inconsistent (Chart 6). The ALC also noted that the proportion of decisions assessed as inconsistent ranged from zero in the first four years to 9 out of 19 decisions (47%) in 2012. Of the 50 applications submitted between 2010 and 2012, 24 (48%) were inconsistent. Between 2001 and 2012, the majority of the decisions (21 of 36 or 58%) deemed potentially inconsistent were approved pursuant to LGA s.946.

Chart 6. Consistency of all decisions within ALCA (2001-2012)



The following is a summary of the key findings that were identified by the ALC in its review of RDFFG decisions made under the Delegation Agreement.

1. A number of decisions made by the RDFFG (31%) have been assessed as potentially being inconsistent with ALC decision making.
2. Most of the potentially inconsistent decisions were made under the provision in the OCP that permits subdivision for relatives under Section 946 of the *Local Government Act* (s.946).
3. Almost half (48%) of decisions made by the RDFFG were approved contrary to the advice of the Ministry of Agriculture staff.
4. RDFFG Staff reports do not highlight all relevant OCP policies relating to agriculture when advising the Board.
5. RDFFG Board reasons for decisions are not provided.
6. The perspective of the *Agricultural Land Use Standing Committee*: that rural subdivision should be encouraged in view of the community benefits, may be contrary to agricultural interests.
7. Further study may be required to assess whether incremental subdivision approved by the RDFFG Board in the Pineview area has progressively affected agriculture, and whether permitting a limited amount of rural subdivision on the periphery of Prince George has potential to create opportunities for more intensive small lot agriculture and a buffer between urban development and large lot agriculture.
8. The Commission has not provided adequate training to the members and staff of the Regional District.

RDFFG position on amendments to ALCA

In May, 2014, the Province of BC passed a law to amend the ALCA. A consultation process followed in order to change the corresponding regulations under the *Agricultural Land Reserve Use, Subdivision and Procedure Regulation*. As part of this process, RDFFG staff prepared a report for the Board, which then approved a written submission to the provincial government. The position of the RDFFG (2014a) is as follows:

The Regional District of Fraser-Fort George supports the changes that involve the division of the province into two Agricultural Land Reserve (ALR) zones as it reflects what the Regional District has been able to pursue and achieve through its Official Community Planning (OCP) process and the ALR Delegation Agreement that is based upon its OCPs. The OCPs support the protection of good agricultural land and the expansion of the agricultural industry for local food security and economic diversification. The issues listed in the new legislative provisions that are to be considered in Zone 2 ALR decision making, reflect those used in the development of the Regional District's OCP's namely:

- a. to preserve agricultural land;
- b. to encourage farming on agricultural land 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 agricultural land and uses compatible with agriculture in their plans, bylaws and policies.

In Zone 2, the Agricultural Land Commission (ALC) is now also required by legislation to consider, in descending order of priority:

- the purposes of the ALC as defined in section 6 of the Act;
- economic, cultural and social values; and
- regional and community planning objectives.

Regional agricultural planning

In September, 2014, the RDFFG Board approved a motion to hire a consultant “for an investigative study of the local Agricultural Industry and analysis of existing support programs” (RDFFG, 2014b). In its report to the Board, the Agricultural Land Use Standing Committee (ALUSC) stated that it may be possible for the RDFFG to better serve the agricultural industry. In prior reports, RDFFG staff noted that completing an agricultural plan is an option for moving forward. Staff mentioned relevant policies of the ALCA in protecting the fragmentation and non-farm use of agricultural land as well as RDFFG OCP policies related to the protection of agricultural land. The initial report to the ALUSC (RDFFG, 2013) had a stronger focus on both the need for an agricultural plan and the ability of the RDFFG to protect agricultural land. Both an Agricultural Advisory Committee and agricultural land use inventories were mentioned in relation to developing an agricultural plan.

Overall, the RDFFG is actively engaged in agricultural land use planning, with direct involvement as required under its Delegation Agreement with the ALC. The ALC's review points to some

areas of concern as well as opportunities to strengthen the RDFFG's agricultural land use planning practices. The greatest concern centres on the high level of inconsistencies (31%), many of which were related to subdivision to provide residence for a relative under LGA s.946. As well, the proportion of inconsistent decisions has increased over the past few years. The RDFFG's position on the amendments to the ALCA reflects a moderate position to protect agricultural land, as indicated by the emphasis on only "good" agricultural land and the general support for more non-farm uses in order to support other economic development goals. This position is also reflected in the present interest in regional agricultural planning, where the initial interest in protecting farmland has shifted to a more general interest in supporting the agricultural sector. Collectively, these recent developments demonstrate that the RDFFG is very interested in the agricultural sector, of which protecting farmland is recognised as one of the elements but not an over-riding priority.

Legislative framework

The legislative framework consists of policies, regulations, and governance structures related to agricultural land use planning at local, regional, and provincial levels of government. Policy documents were identified as enforceable, aspirational, or enabling (refer to the appended glossary for definitions of these and other terms). Table 7 displays the three tiers of agricultural land use planning policies and legislation. At the provincial level, the framework includes the provincial legislative documents pertinent to agricultural land use planning, such as the *Local Government Act*, the *Farm Practices Protection Act*, and *Agricultural Land Commission Act*, the *Land Title Act*, as well as the *Water Act*.

At the regional landscape level, the Robson Valley Land and Resource Management Plan (LRMP) (ILMB, 1999) and the Robson Valley Sustainable Resources Management Plan (SRMP)¹ serve to guide uses of Crown land within the Robson Valley Downstream area of the RDFFG. Neither the LRMP nor the SRMP are legal documents. One enforceable policy arising from the LRMP is the legal order to establish Agricultural Development Areas (ADAs) in the area. These ADAs recognise the agricultural potential and farm use of specified Crown lands. We also include the Agriculture Sector Strategy (OBAC, 2009) in the local legislative framework as an aspirational strategy. Within the RDFFG, a zoning bylaw covers all lands not under the jurisdiction of an OCP within the region. In the RDFFG there is no Regional Growth Strategy that addresses long-term planning issues for incorporated and unincorporated areas.

The local framework for the Robson Valley Downstream area consists of one legislation document and one policy document. The legislation document is the Robson Valley-Canoe Downstream Official Community Plan. The local policy document is the Robson-Canoe Valleys Economic Opportunities Plan (Millier Dickinson Blais Inc., 2010), which focusses on economic growth and development within the sub-region and does not influence agricultural land use decision-making processes directly.

Governance for agriculture land use planning is carried out by the ALC North Panel. However, as discussed above, the Regional Board has delegated authority for non-farm use and subdivision for ALR lands. In this capacity, the RDFFG has a significant level of authority over

¹ The Robson Valley SRMP was not available electronically on the Government website. Consequently, it was not included as part of the content analysis.

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Table 7. Legislative Framework for the Robson Valley-Canoe Downstream Area

PROVINCIAL	[ALC] Annual Service Plans [MAL] Strengthening Farming [ALC] ALR and Community Planning Guidelines [Smith] “Planning for Agriculture”	<i>Agricultural Land Commission Act</i> <i>Local Government Act</i> <i>Farm Practices Protection (Right to Farm) Act</i> <i>Land Title Act</i> <i>Range Act</i> <i>Water Act</i> Agricultural Land Reserve Use, Subdivision, and Procedure Regulation	Agricultural Land Commission [ALC Act] <i>Administrative Tribunals Act</i> Governance Policy for the Agricultural Land Commission
REQUIRED INTEGRATION	LGA Part 25 849 (e) Purpose of regional growth strategy: maintaining the integrity of a secure and productive resource base, including the agricultural land reserve		
REGIONAL	Robson Valley LRMP (1999) Robson Valley SRMP (1999) OBAC Agriculture Sector Strategy (2009)	RDFFG Zoning Bylaw <i>Agricultural Development Areas</i>	RDFFG Agricultural Land Use Standing Committee
REQUIRED INTEGRATION	<p>LGA Part 25 46 Conflict with bylaws A local government must ensure that its bylaws are consistent with the ALC Act. A bylaw that is inconsistent has no force or effect.</p> <p>LGA Part 25 882 (3) (OCP) Adoption procedures 882 The local government must refer the plan to the ALC for comment.</p> <p>LGA Part 25 946 (3) Subdivision to provide residence for a relative ALC Act 13 Dispute resolution on community issues</p>		
LOCAL	Robson-Canoe Valleys Economic Opportunities Plan (2010)	<i>RVCD Official Community Plan (2002)</i>	

Acts (provincial laws), bylaws (local government laws, e.g., official municipal plan) [italicised]

Enforceable policy, regulations pursuant to acts [bold]

Aspirational policy at all levels [plain text]

agricultural land use decisions. In its delegated capacity, the RDCFG assumes the role of the Commission (and North Panel) in receiving and considering application. The Act does not provide the ability for a delegated authority to include or exclude land from the Agricultural Land Reserve.

The primary local governance structure in the RDCFG is the Agricultural Land Use Standing Committee (ALUSC), which oversees the whole region. The role of the ALUSC is to consider all ALR applications and to make recommendations to the Regional Board. The Regional Board makes the final decision or recommendation to the ALC. There is no Agricultural Advisory Committee (AAC) in the RDCFG, nor does the region use Advisory Planning Commissions (APC) in its Electoral Areas.

Prior to presenting the results of our content analysis for the Robson Valley-Canoe Downstream area, we will present the results of our review of all the OCPs in the RDCFG.

Official Community Plans

The purpose of an OCP is to establish a long-term vision for an area and its residents; it sets objectives and policies that guide decisions on land use management. Given its importance, we reviewed the OCPs to understand the importance of agriculture within the larger vision and the extent of the presence of agriculture among land use policies. For this report, we analysed eight OCPs, as listed in Table 8. Collectively, these OCPs cover most of the RDCFG.

Table 8. Official Community Plans, Regional District of Fraser-Fort George

Official Community Plan	Date approved	Electoral Area
Salmon River-Lakes	1996	A
Chilako River-Nechako	2010	C
Pineview		D
Tabor Lake-Stone Creek	2004	D
Willow River-Upper Fraser Valley	1996	F
Crooked River-Parsnip	2007	G
Robson Valley-Canoe Downstream	2002	H
Robson Valley-Canoe Upstream	2006	H

There is a very high level of consistency among all of the OCPs regarding statements directly related to agricultural land and its uses. The following statements for Agricultural Objective and Land Use Policy for Agricultural Lands appear in all of the OCPs with only minor differences in some cases.

Agricultural Objective:

To support the general objectives of the Land Reserve Commission, namely to preserve agricultural land and encourage the establishment and maintenance of farms and the use of land within the Agricultural Land Reserve compatible with agricultural purposes and to guide other forms of development so as to minimize negative impacts on agricultural uses.

Land Use Policies – Agricultural Lands:

With respect to the protection of the agricultural land base the Regional Board will:

- (i) support the Agricultural Land Reserve Act with its general objective of protecting agricultural land for future food production;
- (ii) discourage and restrict the fragmentation of agricultural land by subdivision by means of generally large minimum parcels size regulations;
- (iii) direct non-farming residential uses to existing residential settlements and away from existing or potential future agricultural areas;
- (iv) not promote development of agricultural land for non-agricultural uses unless it is shown that there is no practical alternative location or that it will not be detrimental to the long term agricultural potential of the land as determined by the Land Reserve Commission for lands within the ALR;
- (v) support the buffering of agricultural land in the ALR from the impact of new non-agricultural subdivision that may include the provision of fencing or leave strips.

In the addition to the above statements that most clearly set the objectives and general policies for agricultural lands, a strong commitment to preserving farmland appears in relation to objectives for greenhouse gas reductions.

Greenhouse Gas Reduction Objective

No Net loss of farmland within the Regional District over the next 10 years.

- a. This Plan outlines policies and general guidelines that discourage and restrict the fragmentation of agricultural land in the plan area.
- b. Subdivision of large parcels is limited by promoting subdivision in established small parcel designations identified in the Plan.
- c. Promote farming within the Regional District by allowing agricultural opportunities through designation as identified by the Plan.

This statement appears in all OCPs. Given that the most recent OCP was approved in 2010, this means that the RDFFG's commitment to "no net loss of farmland" presently extends to 2020.

Each OCP includes a comprehensive statement under Implementation that recognises the authority of the ALC, as follows

Land Reserve Commission

Proposals for the non-agricultural use or subdivision of lands within the Agricultural Land Reserve (ALR), that are not permitted by the Agricultural Land Commission Act, regulations thereto or Policies of the Agricultural Land Commission, require application to the Commission and will be considered for a Regional Board recommendation based upon the provisions of this Plan, and their potential impact on the agricultural viability of the subject property and surrounding area.

The Regional Board recognizes that the Agricultural Land Commission's mandate for the preservation and enhancement of agricultural land requires their analysis of individual applications for subdivision or non-farm use of land within the Agricultural Land Reserve based on the specific merits of each proposal, and the Commission is not

obligated to approve applications that comply, or alternatively, refuse applications that do not comply, with this Plan.

However, in consulting with the Agricultural Land Commission in the development of this Plan, it is understood that the Commission does concur with the content of the Plan thereby setting a level of certainty of the nature of future development directions in the Plan area.

Proposals for non-agricultural use, subdivision or exclusion from the Agricultural Land Reserve that are approved by the Agricultural Land Commission, remain subject to the policies and regulations of the Regional District.

In the section on Land Use Designations and Maps, the Agriculture/Resource (AG/RES) designation covers both agricultural lands and resource lands, as follows:

The Agriculture/Resource designation applies to the majority of lands within the Plan area including both privately owned and Crown lands utilized for primary resource extraction, agriculture, non-development or are relatively remote as shown on the Plan's maps. Any land within the Plan area that is not specifically designated otherwise on the maps is hereby designated Agriculture/Resource (Ag/Res).

The AG/RES designation includes the following uses: agriculture, intensive agriculture; forestry and other resource extraction uses; public open space; residential; home business; and uses recognised by the Province as backcountry resorts and recreation activities. AG/RES also includes the following additional uses, which are subject to evaluation through a rezoning process where necessary – and provided there is minimal impact on adjacent agricultural activities. As well, all of the following proposed non-farm uses in the ALR are subject to application and evaluation.

- (i) Rural and Service Industrial uses;
- (ii) uses that are compatible with or complementary to agricultural or resource extraction uses including, but not limited to, reclamation of existing sites or the preliminary processing of resource products;
- (iii) Recreation Commercial uses.
- (iv) Local Commercial uses;
- (v) Public Development/Institutional uses, provided that where located within the Agricultural Land Reserve, they are needed to serve the community within which they are located.

The policy for Parcel Sizes in AG/RES states that the minimum size for creating new parcels is 60 ha (150 acres). In addition to accommodating topographical constraints, an exception for smaller lots is possible under the homesite severance policy of the ALCA or under the subdivision for a relative (LGA s.946). Such exceptions may require evaluation through a rezoning process or approval by the ALC for lands within the ALR.

Within the AG/RES designation, two other statements relevant to agricultural lands are worth noting. The policy for Mineral and Aggregate Resources states that extraction of known sand and gravel deposits is an accepted use, but if the land is within the ALR then it is subject to

the ALCA. Additional residences for farm help or for temporary resource extraction camps may be permitted.

Statements relevant to agricultural land uses and the ALCA appear in other sections, including Housing; Lake Protection; Development Proposals Contrary to the Plan; and Subdivision and Rezoning Evaluation. These statements acknowledge policies and procedures of the ALC, recognise ALR lands, identity issues related to agricultural uses and buildings next to water bodies, the need for consistency of OCP policies with the ALCA, as well as the potential for impacts of development upon neighbouring agricultural uses.

As a complement to the high level of intra-plan consistency across OCPs, the plans also recognise differences within the Regional District. In the following, we highlight some of these differences.

Salmon River-Lakes OCP (1996) (Area A):

The Salmon River-Lakes OCP identifies part of the Prince George fringe area as a Special Management Area that requires specific development and servicing policies. The fringe is defined, generally, as the area within 5 km of the City boundary. The aim of the policies is to “help coordinate development in relation to existing and future development within the municipality” (p. 39). To this end, the OCP is intended to complement the land uses that are in close proximity to the City boundaries. Within this context, there is no statement to protect farmland. The following statement recognises the right to farm, but may also discourage farm uses within the fringe area:

Manage land uses so as to avoid noxious uses which by reason of noise, emission or odour may conflict with existing or designated future land uses in the vicinity, provided that established agricultural activities conducted in accordance with the Codes of Agricultural Practices [for Waste Management] and in conformity with recognized standards of agricultural practice are protected.

The *Farm Practices Protection (Right to Farm) Act* is relevant to but not integrated into the above policy.

The policy on parcel sizes in the Salmon River-Lakes OCP also includes a statement that recognises the specific needs to plan for the Prince George fringe area:

(iii) For Ag/Res land within the Prince George Fringe Area (Section 4.4):

- a) where it has been established to the satisfaction of the Board, in consultation with the Land Reserve Commission, that the land is not suitable for agriculture, the minimum parcel size may be reduced to 4 to 15 ha (10 to 37 acres) to provide individual larger rural residential parcels subject to a rezoning process, provided there is not a significant impact upon adjacent agricultural uses;
- b) the minimum parcel size may be reduced to 1.6 ha (4 acres) where the purpose is to permit infill subdivision consistent with surrounding parcel sizes, provided that for land within the ALR support of the Land Reserve Commission is required.

Chilako River-Nechako OCP (2010) (Area C):

In addition to the terms stated in other OCPs, the Agricultural Objective for the Chilako River-Nechako area includes the objective “To recognize agriculture as a viable industry in the area.” Although this is the only OCP to include such a statement, the agricultural land use policies for this area are the same as other OCPs. If agriculture is particularly important for this area, the statement does not appear to be reflected in other aspects of the OCP.

Like the Salmon River-Lakes area, the Chilako River-Nechako area is adjacent to the City of Prince George and identifies the north-east fringe area as a Special Management Zone. The policies are identical.

Pineview (Area D):

The Pineview area shares a boundary with the City of Prince George and the Prince George Airport, both of which have a high influence on land uses. Correspondingly, policies are aligned with supporting the economic development objectives of the City and airport, including both industrial and residential developments. In this context, the Agricultural Objective in the Pineview OCP is “Subject to the needs of the Pineview area.” The inclusion of this statement appears to reflect the historical and preferred use of this area for residential and industrial development and the corresponding prevalence of non-farm uses and subdivision of agricultural lands.

The particular needs of the Pineview area are reflected in a unique difference in the OCP’s Agricultural Land Use policy, which states: “direct non-farming residential uses primarily to lands designated Rural Residential (RR) and Rural Holding (RH).” The corresponding statement in all other OCPs is to “direct non-farming residential uses to *existing residential settlements and away from existing or potential future agricultural areas*” (emphasis added). The effect of this difference in the OCP is to decrease the level of protection for agricultural areas when considering residential uses.

Tabor Lake-Stone Creek (2004) (Area D):

The Tabor Lake-Stone Creek OCP is similar to other OCPs in all aspects regarding agricultural lands uses discussed above. The following differences are related to sub-areas within the area.

- Tabor Lake is identified as a rural residential area with potential for growth. Policies for accommodating this growth refer to lands not in the ALR or having limited agricultural viability because they are too small, have marginal soils, or are surrounded by residential subdivisions.
- The Buckhorn area, although it contains some existing subdivided parcels, is surrounded by lands in the ALR. The general policy states that this sub-area will not be a focus for major settlement, but serve as a centre for a larger rural area.
- The 15 Mile Road area contains existing subdivisions primarily. The general policy for this Rural Residential area is to provide for some minor new infill or incremental subdivision in a manner that has the least impact on agricultural pursuits in the area.
- Red Rock is designated as a Settlement Centre because it is a focal point for a larger rural area. If further subdivision is required, it will be directed onto the poorest agricultural land in the immediate vicinity.

Willow River-Upper Fraser Valley (1996) (Area F):

Like other areas, the Willow River-Upper Fraser Valley area is adjacent to the City of Prince George and identifies the fringe area as a Special Management Zone. Although the area includes productive agricultural lands, e.g., Foreman Flats, the policies are identical. A corresponding policy for exceptions to minimum parcel size is also similar, with recognition for agricultural land uses.

Crooked River-Parsnip (2007) (Area G):

The Agricultural Objective of the Crooked River-Parsnip OCP acknowledges the limited potential for agriculture in the area, as follows.

Although there is little Agricultural Land Reserve land within this Plan area, it is the general objective of the Regional Board to encourage the establishment and maintenance of farms and the use of land within the Agricultural Land Reserve compatible with agricultural purposes and to guide other forms of development so as to minimize negative impacts on agricultural uses. The Regional Board also supports the establishment of agricultural use of land throughout the Plan area, regardless of ALR status.

The Agricultural Land Use policy identifies the limited areas with agricultural potential and notes that future logging for beetle-killed timber may open up additional lands with agricultural potential.

Robson Valley-Canoe Downstream (2002) (Area H):

The Robson Valley-Canoe Downstream OCP is similar to other OCPs in all aspects regarding agricultural lands uses discussed above. The following differences are related to sub-areas within the area. Of note, the settled area of Dunster is designated as a Community Area and Special Management Area. A Community Area designation, as distinguished from a Settlement Center, refers to a more spread out rural area. The following policy applies to Dunster.

It is the policy of the Board to recognize Dunster as an agricultural community where significant additional subdivision will not be allowed but limited rural residential subdivision may be permitted considering the following criteria:

- (i) land should be non-ALR or low capability ALR land preferably at the side of the Valley;
- (ii) Consolidating multiple farm holdings into larger parcels as part of the subdivision proposal will be considered, as a net benefit to agriculture;
- (iii) to prevent concentrations of residential development, there should not be more than 3 lots in any one location;
- (iv) new lots should have guaranteed access to residential water supply and flow in creeks will be considered.

Through these policies the RDIFFG provides a clear intent to maintain the character of Dunster as a rural “agricultural community,” which is a unique elements among all OCPs, with larger lot sizes and less residential development.

The fringe area around the Village of McBride also requires specific development and servicing policies. As with other fringe areas within the RDIFFG, the aim within fringe areas is to help coordinate development, in this case between the Robson Valley-Canoe Downstream OCP and the plan and policies of McBride.

Robson Valley-Canoe Upstream (2006) (Area H):

By the same means used in the Pineview OCP, the Agricultural Objective in the Robson Valley-Canoe Upstream OCP is “Subject to the needs of the Valemount Canoe area,” although the pressures on the land base are very different. These needs are accommodated through policies for the West Valemount Special Management Area and for the Village of Valemount. Both sections include specific development and servicing policies to help coordinate development in relation to existing and future plans within the Village. The aims of these policies are to accommodate residential growth and the development of tourism projects and activities.

Correspondingly, the Land Use Policies for Agriculture in the OCP states:

The Board recognizes that the agricultural industry is an integral part of the valley economic base, and is cognizant of the importance of retaining agricultural land for future food production.

With increasing pressure from tourism and residential interests, it is the policy of the Board to protect for agriculture those areas that have easy access to water for irrigation. The soils through the majority of the valley are very sandy and appear to provide the best returns with constant irrigation.

The Land Use policy then identifies constraints and opportunities for agriculture within specific areas. For example, the policy notes that fragmentation of the agricultural land base in an area with the largest amount of Class 3 soils and easy access to water for irrigation will not be supported. It also notes areas that are not supported for agriculture, which are areas identified for residential development due to proximity to the Village of Valemount and not easy access to water. Non-farm development is also supported in the long term in the area close to the Valemount Airport; agriculture will remain the dominant use in the short and medium terms.

Content analysis of documents

After documenting the legislative framework we assessed the contents of the documents, with a focus on the Robson Valley-Canoe Downstream Area, as set within the context of regional planning. The results of this content analysis reflect the breadth and quality of the legislative framework. For this we used a three-point (check mark) scale indicating different levels of detail from minimal (✓) to moderate (✓✓) to high (✓✓✓). The criteria we used for this part of the assessment are included in Appendix: Criteria for Evaluating Content of Legislative Framework.

Local government legislation documents

Much of the content of the Robson Valley-Canoe Downstream OCP is consistent with other OCPs, the details of which were discussed above. Some of the details will be re-stated here in

relation to the Robson Valley-Canoe Downstream OCP. Overall, the OCP covers many elements of agricultural land use planning, contains a minimum level of detail with regard to the legislative context, and a maps showing AG/RES land designations. The results of the content analysis for the OCP and RDFFG zoning bylaw are shown in Tables 9 and 10.

The OCP has an explicit statement of the Agricultural Objective for the area, as noted above. The OCP also includes a Land Use Policy for Agriculture that is consistent with the policies of other RDFFG OCPs. Here again, the OCP includes support for the “general objective” of the ALCA to protect agricultural land for future food production. The policy also discourages and restricts the fragmentation of agricultural land by subdivision; and directs non-farming residential uses to existing residential settlements and away from existing or potential future agricultural areas. The RDFFG does not promote development of agricultural land for non-agricultural uses, unless it is shown that there is no practical alternative location and that it will not be detrimental to the long term agricultural potential of the land. It also supports the buffering of agricultural land in the ALR from the impact of new non-agricultural subdivision.

As part of the RDFFG’s objective to reduce greenhouse gases, the OCP, like other OCPs, includes a policy that requires a “no Net loss of farmland within the Regional District over the next 10 years.” This policy also discourages and restricts the fragmentation of agricultural land in the plan area.

With regard for the legislative context, the OCP includes a moderate level of detail regarding the ALC Act. Like other RDFFG OCPs, the Robson Valley-Canoe Downstream OCP includes a comprehensive statement under Implementation that recognises the authority of the ALC, the requirements for applications, and the relation of the ALCA to RDFFG policies. However, there is only little detail or no mention of other relevant policies. For example, the *Farm Practices Protection (Right to Farm) Act* is cited primarily in the context of agricultural waste management. There is no mention of planning tools to minimise agricultural-residential conflicts, such as awareness covenants or development permit areas. The zoning bylaw sets out the regulations for agricultural lands and names relevant provincial acts.

The OCP also identifies sub-areas that require specific development and servicing policies. As discussed above, the settled area of Dunster is uniquely characterised as a rural “agricultural community” with larger lot sizes and less residential development. The fringe area around the Village of McBride also requires specific development and servicing policies.

Local government policy documents

The policy documents we assessed include the Robson Valley LRMP, OBAC Agriculture Sector Strategy, and the Robson-Canoe Valleys Economic Opportunities Plan. The results of the content analysis are presented in Tables 11, 12, and 13. None of the documents is an enforceable policy.

Of the policy documents, the SRMP has the most influence over land use planning on Crown lands. The SRMP includes a good level of detail of relevant provincial legislation and also cites the need to integrate with OCPs. It also includes a stated objective for agriculture: “Maintain or enhance opportunities for use of Crown Land, vegetation, and water resources for agriculture, fisheries and food production.” The LRMP lists five strategies to achieve this objective, which includes farmland protection:

- Support the purpose and intent of the Agricultural Land Reserve (ALR)

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Table 9. Contents of local agricultural land use legislative documents

	Legislative Context	Background	Vision, Goals, Objectives	Regulations (enforceable policies, procedures)	Maps
Robson Valley-Canoe Downstream OCP	✓	✓	✓	✓✓	✓
RDFFG Zoning Bylaw	✓			✓✓	

Table 10. Breadth and depth of legislative context

	Legislative context (legislation and policies)						Land use planning tools				Gov.
	ALC Act	Right to Farm	Water Act	Range Act	Land Act	Local Gov't Act	Farm Bylaw	Covenant	ADA	DPA	AAC
Robson Valley-Canoe Downstream OCP	✓✓	✓	✓		✓	✓					
RDFFG Zoning Bylaw	✓					✓					

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Table 11. Contents of local land use policy documents

	Legislative Context	Background	Vision, Goals, Objectives	Regulations (enforceable policies, procedures)	Maps
Robson Valley LRMP	✓✓	✓	✓	✓	✓
Robson-Canoe Valleys Economic Opportunities Plan	✓	✓✓	✓✓		✓
OBAC Agriculture Sector Strategy	✓	✓✓✓	✓✓		✓

Table 12. Breadth and depth of legislative context: policy documents

	Legislative context (legislation and policies)						Land use planning tools				Gov.
	ALC Act	Right to Farm	Water Act	Range Act	Land Act	Local Gov't Act	Farm Bylaw	Cov- enant	ADA	DPA	AAC
Robson Valley LRMP	✓		✓	✓	✓				✓		
Robson-Canoe Valleys Economic Opportunities Plan											
OBAC Agriculture Sector Strategy	✓								✓		✓

Table 13. Status of local agricultural land use policy documents

	In progress	Aspirational	Enforceable		
		Received by Council	Robson Valley-Canoe Downstream OCP		
			Named in plan	Led to revisions of plan	Adopted as by-law (sub-area plan)
Robson Valley LRMP			✓		
Robson-Canoe Valleys Economic Opportunities Plan		✓			
OBAC Agriculture Sector Strategy		✓			

- Preserve and maintain the quality of soil within the ALR through appropriate legislation
- Support the Robson Valley Crown Land Plan and its designated Agricultural Development Areas
- Allow Crown lands with suitable agricultural potential to be alienated for agricultural uses via the Crown Agricultural Lease policy
- Improve mechanisms for identifying Crown land areas adjacent to private agricultural operations that are of interest for future alienation for agricultural uses

By these measures, the LRMP serves agricultural uses of Crown Land by integrating them with other natural resource developments.

The OBAC agricultural strategy focusses on the agriculture sector broadly and on local food security issues, with recommendations for these areas of concern. The strategy provides a good level of detail on the background of agriculture in the region and covers goals and objectives for the sector, and has some detail about agricultural land use planning in the section Sector Land and Resource Management Issues. The importance of agricultural land use planning is reflected in the following statement (p. 28): “There is a need to retain existing agricultural land for future industry use and a need to identify and develop additional land for eventual agricultural application.” Protecting farmland is not mentioned in one of the five recommendations but is listed under “Develop infrastructure that supports the agriculture sector and removes barriers to its further development and diversification.” In response to the recognised need to maintain and expand the agricultural land base, this recommendation includes the need to “ensure existing productive agricultural land is retained and identify land for future agricultural production” (p. 32). With regard to ADAs, the document emphasises the opportunity available for these lands: “Agriculture Development Areas (ADAs) can also be a potential tool for creating certainty. ADAs are crown lands where there is recognized agricultural capability that are suitable for future development” (p. 28). The agricultural strategy was produced in 2009, but is not mentioned in any OCPs.

The Robson-Canoe Valleys Economic Opportunities Plan provided additional background information. The Opportunities Plan provides visions, goals and objectives, but does not refer to agricultural land use planning or farmland protection. The references within the plan are aimed towards economic development and local market expansion. For example, the main objectives focus on product development, workforce development, government process, and investment attraction/development.

Current Issues

When reviewing the contents of the documents, we also explored three issues that have come up in the project that are current issues: small-lot agriculture/fragmentation of farmland; alienation of farmland/foreign ownership; and natural resource developments.

Small-lot agriculture/fragmentation of farmland

The combined issue of small-lot agriculture and fragmentation of the land base centres on what appears to be a growing awareness of food sovereignty. Much of this interest in small-lot

agriculture is associated with new farmers and their need for affordable land that is reasonably close to population centres. What makes the demand for small-lot agriculture particularly important is that there is often little room within farmland protection legislative frameworks to accommodate smaller lots. The main reason is that sub-dividing into smaller lots is in direct conflict with the over-riding goal to not fragment the land base. The primary land use planning tool for preventing fragmentation is large minimum lot sizes. Thus, small lots and farmland protection are often in direct opposition.

Some OCP policies explicitly reference fragmentation and consolidation. These statements are expressed in the context of protecting agricultural lands and encouraging farming.

A recent situation in Dunster², although it may not be significant for the region as a whole, helps to illustrate how a public desire for small lots for farming can conflict with existing agricultural land use policies. As noted in this report, the Dunster area is designated as a Special Management Area with explicit policies for minimising subdivision, preventing concentration of residential developments, and consolidating multiple holdings into larger parcels as a net benefit to agriculture. All of these policies are barriers for creating small lots, although some smaller lots (1.6 ha and 0.8 ha) may be allowed where land area is limited.

The opportunity for accommodating small agricultural holdings within the Prince George fringe area was also raised in the ALC review as an opportunity/issue. The ALC acknowledged that smallholdings create opportunities for more intensive small lot agriculture and provide a buffer between urban development and large lot agriculture. The issue arises when these lots are used only for residential development and to the detriment of agriculture.

As well, the question of small lots for agriculture, and the corresponding attraction of such lots to new farmers, was a formal element of the BC Ministry of Agriculture's consultation about regulations for the new ALCA amendments. One option being discussed is to accommodate small lots through long-term leases instead of subdivision. In its submission to the government, the RDFFG stated that it is in favour of such leases, as follows:

The ability to lease a portion of land for agricultural use should be allowed if it encourages the intergenerational transfer of an active farm or ranch operation, encourages the use of otherwise under used farm land or increases the ability of a new farmers to access land for intensive soil based agriculture, such as market gardening. Leases over three years are required to be registered with Land Titles as though they are a subdivision - this has been an impediment to longer term agricultural leases that needs to be addressed should this initiative proceed with the ALC regulatory change initiative.

In sum, although the tension between a desire for small agricultural lots and for mitigating fragmentation exists within the RDFFG, this matter is not significant across the region as a whole.

² As reported in newspapers, the purchase of large agricultural lots by foreign owners led to town hall meetings by the Dunster Community Association. Although instigated by the purchase of the large lots, the concerns and interests expressed by area residents included a range of agricultural and food sovereignty issues, including a desire for small lots that appeal to new farmers, which in turn can help to rejuvenate the area.

Alienation of farmland

Although foreign ownership of land is not mentioned as an agricultural land use planning issue in any RDEFG documents, the region has experienced corporations purchasing productive farmland and planting trees for carbon credit. Planting trees for carbon credits is identified as a concern in the OBAC Agriculture Sector Strategy. Newspapers have also reported the purchase of agricultural land by foreign owners in the Dunster area, although the future use of these lands is uncertain. The alienation of farmland has the effect of removing productive agricultural lands and contributing to parcelisation. Although this practice is somewhat isolated presently, its expansion is likely as it appears to be an issue throughout northern BC.

Natural resource developments

Agricultural land use planning is most often associated with urban development. In northern BC, pressures also come from natural resource developments, such as forestry, oil and gas, and mining. The OCPs that make up the RDEFG legislative framework include general statements about the need to manage natural resources in concert with agricultural uses. For example, the OCPs include a Resource Management Objective, which states:

To recognize the importance of the region's forest, agricultural and mineral resource base and to support an integrated approach to their management, such as is progressing under LRMP, PAS and similar resource planning exercises, including non-extraction uses such as wildlife management, watershed and scenic protection, lakeshore conservation and other special environmental considerations for the maximum long term benefit of the region's residents.

The OCPs also include a Crown Land Objective that recognises and complements the efforts of the Province such that specific developments are consistent with RDEFG policies.

Policy regimes

The two policy regimes of farmland preservation and global competitiveness have influenced agricultural land use policy and legislation for over forty years. Food sovereignty, and its associated concerns with food security and demand for local food, is a nascent policy regime that is influencing agricultural land use planning. Within this context, the aim of our analysis was to assess how issues, ideas, interests/actors and institutions associated with the three policy regimes influence local agricultural planning processes, including decisions about zoning, official plans, boundary adjustments, land division and servicing, and, as well, to assess the extent to which agricultural land use planning encompasses a comprehensive view of food systems planning, activities, and issues.

To complete the assessment of the presence and importance of the policy regimes we examined the documents that comprise the legislative framework. Presence and importance were measured as a function of both the level of influence of words, concepts, and statements that appear in the documents and of the placement of these words, concepts, and statements

within each document. The criteria for measuring the policy regime statements are presented in Appendix: Criteria for determining level of influence of policy regimes.

All three policy regimes are present in the local legislative framework, as indicated in Tables 14 through 22. The OBAC Agriculture Sector Strategy appears most frequently in the tables and covers all three regimes; however, this document may be the least influential. In contrast, the policy regimes evident in the Robson Valley-Canoe Downstream OCP are limited to farmland preservation and, at the same time, the OCP is the most influential regarding agricultural land use planning. However, this level of influence of the OCP is weakened due to the absence of high influence statements related to farmland preservation. For example, the OCP includes the following two statements under Agricultural Objective: “To support the general objectives of the Provincial Land Reserve Commission, namely to preserve agricultural land. It is the general objective of the Board to encourage the establishment and maintenance of farms and the use of land within the Agricultural Land Reserve compatible with agricultural purposes and to guide other forms of development so as to minimize negative impacts on agricultural uses.” Although the placement of these statements is of high influence, the absence of a *direct* commitment by the Board to farmland preservation reduces its level of influence to medium.

The policy regime of global competitiveness (Tables 14, 17, and 20) appears primarily in the OBAC strategy document. The strategy includes references to global competitiveness among the vision, goals, and recommendations and identifies global competitiveness as a driving force. The OBAC document refers to the intense competition in the commodity markets, an increasingly globalized food production and distribution system, and difficult international trade regulations. In spite of these kinds of challenges, the OBAC strategy highlights opportunities to focus on serving the local market and growing into serving provincial, national, and international markets. The LRMP has a statement of low influence that refers to the highly competitive nature of dairy and beef agriculture.

Food sovereignty (Tables 16, 18, and 22) appears only in the OBAC strategy document. The document refers to developing food charters that outline food procurement requirements and marketing campaigns to promote awareness of the benefits of consuming local food.

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Table 14. Analytical framework for policy regimes at local level: global competitiveness documents

		GLOBAL COMPETITIVENESS			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	OBAC Agriculture Sector Strategy	OBAC Agriculture Sector Strategy		
	Medium Influence	OBAC Agriculture Sector Strategy	OBAC Agriculture Sector Strategy		
	Low Influence		OBAC Agriculture Sector Strategy Robson Valley LRMP		

Table 15. Analytical framework for policy regimes at local level: farmland preservation documents

		FARMLAND PRESERVATION			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence			<i>RVCD OCP</i>	
	Medium Influence	<i>RVCD OCP</i>		<i>RVCD OCP</i>	OBAC Agriculture Sector Strategy
	Low Influence		OBAC Agriculture Sector Strategy	<i>RVCD OCP</i>	OBAC Agriculture Sector Strategy Robson Valley LRMP

Table 16. Analytical framework for policy regimes at local level: food sovereignty documents

		FOOD SOVEREIGNTY			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	OBAC Agriculture Sector Strategy			
	Medium Influence	OBAC Agriculture Sector Strategy	OBAC Agriculture Sector Strategy		
	Low Influence	OBAC Agriculture Sector Strategy	OBAC Agriculture Sector Strategy		OBAC Agriculture Sector Strategy

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Table 17. Analytical framework for policy regime at local level: global competitiveness themes

		GLOBAL COMPETITIVENESS			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	<ul style="list-style-type: none"> • [New model] While expanding to meet local demand, develop and market products for provincial, national, and international markets • Recommendation: Support the development of provincial, national, and international markets for these products. 	<ul style="list-style-type: none"> • Farmers have competed with primary producers from across North America and the world. 		
	Medium Influence	<ul style="list-style-type: none"> • Using multiple strategies, the agriculture sector will...grow to serve broader provincial, national, and international markets. 	<ul style="list-style-type: none"> • Ranchers are facing difficulties...including the U.S. policy of Mandatory Country of Origin labeling, and the residual impacts from BSE • Intense competition in the commodity markets • Consumer confidence in the safety and quality of food is critical to the growth and diversification of the agriculture industry and its ability to sell its products in global markets. 		
	Low Influence		<ul style="list-style-type: none"> • Over the medium- and long-term, quality, specialty, and other products can be developed by area producers for the much larger provincial, national, and international markets. • Little growth is expected in dairy and beef agriculture due to the highly competitive nature of the industry. 		

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Table 18. Analytical framework for policy regime at local level: farmland preservation themes

		FARMLAND PRESERVATION			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence			<ul style="list-style-type: none"> • No Net loss of farmland within the Regional District over the next 10 years. <ul style="list-style-type: none"> • This Plan outlines policies and general guidelines that discourage and restrict the fragmentation of agricultural land in the plan area. • Subdivision of large parcels is limited by promoting subdivision in established small parcel designations identified in the Plan. 	
	Medium Influence	<ul style="list-style-type: none"> • Agricultural Objective: To support the general objectives of the ALC, namely to preserve agricultural land. It is the general objective of the Board to encourage the establishment and maintenance of farms and the use of land within the ALR compatible with agricultural purposes and to guide other forms of development so as to minimize negative impacts on agriculture 		<ul style="list-style-type: none"> • With respect to the protection of the agricultural land base the Regional Board will: support the ALCA with its general objective of protecting agricultural land for future food production • Recognize Dunster as an agricultural community where significant additional subdivision will not be allowed 	<ul style="list-style-type: none"> • Ensure existing productive agricultural land is retained and identify land for future agricultural production.
	Low Influence		<ul style="list-style-type: none"> • There is also some concern that agricultural land may be planted to trees for use as carbon credits, which would limit the further development of some of the region's productive agriculture land. 	<ul style="list-style-type: none"> • Provided there is minimal impact on adjacent agricultural activities; uses that are compatible with or complementary to agricultural uses • The Board recognizes that the ALC mandate requires their analysis of individual applications for subdivision or non-farm use of land • The extent of agricultural development and potential for impact upon neighboring agricultural use 	<ul style="list-style-type: none"> • Review the future application of the ALR and decisions with respect to it in the region are consistent with the unique needs and circumstances of the region. • Objective: Maintain or enhance opportunities for use of Crown Land, vegetation, and water resources for agriculture, fisheries and food production: <ul style="list-style-type: none"> • Support the purpose and intent of the ALR • Preserve and maintain the quality of soil within the ALR

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Table 19. Analytical framework for policy regime at local level: food sovereignty themes

		FOOD SOVEREIGNTY			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	<ul style="list-style-type: none"> • New model emphasizes locally-produced healthy food products and the importance of food security for the region. • A reasonable economic return for farmers is the cornerstone to attract new entrants and ensure long-term sustainability. • Recommendation: Increase the demand for locally and regionally produced foods. 			
	Medium Influence	<ul style="list-style-type: none"> • Discussions with agriculture stakeholders highlight the close relationship between regional food security and health and well-being. • Objective. Increase public support for the sector and interest in locally produced high quality food. 	<ul style="list-style-type: none"> • Interest is growing for greater availability of locally-produced agricultural products. The benefits include improved food security, better health • Ensuring access to fresh, nutritious food is critical for maintaining a healthy population 		
	Low Influence		<ul style="list-style-type: none"> • There is a currently considerable interest in supplying products to local markets. Farmers markets have been established or expanded in recent years. 		<ul style="list-style-type: none"> • Develop food charters which outline food procurement requirements • Support locally grown food and more regional food security will stimulate further development of the agriculture industry.

Table 20. Analytical framework for policy regimes at local level: frequency of global competitiveness

		GLOBAL COMPETITIVENESS			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	2	1	0	0
	Medium Influence	1	3	0	0
	Low Influence	0	2	0	0

Table 21. Analytical framework for policy regimes at local level: frequency of farmland preservation

		FARMLAND PRESERVATION			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	0	0	1	0
	Medium Influence	1	0	2	1
	Low Influence	0	1	3	2

Table 22. Analytical framework for policy regimes at local level: frequency of food sovereignty

		FOOD SOVEREIGNTY			
		Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	Action Items
Level of Influence	High Influence	3	0	0	0
	Medium Influence	2	2	0	0
	Low Influence	0	1	0	2

Discussion

Our overall aim for the project is to identify principles and beneficial practices that represent land use planning solutions that protect farmland. As a step toward this final aim we identified four principles that guided our analysis: maximise stability, minimise uncertainty, integrate across jurisdictions; and accommodate flexibility. In this section we discuss the strength of the local legislative framework for the RDFFG with a focus on the Robson Valley-Canoe Downstream area. We also discuss the influence of the three policy regimes.

Assessment of Principles

Our assessment of the four principles is summarised in Table 23. As supported through the results discussed in this report, the sources of strength for the local legislative framework are its ability to maximise stability and accommodate flexibility. The framework effectively integrates public priorities across jurisdictions, but is challenged by a high level of uncertainty associated with permitted non-farm uses of agricultural lands.

Table 23. Principles of Land Use Planning, Robson-Canoe Downstream

Regional District	Maximise stability	Integrate across jurisdictions	Minimise uncertainty	Accommodate flexibility
RDFFG: Robson-Canoe Downstream	**	**	***	****

* = Very weak, **** = Very strong

Maximise stability

A stable legislative framework for protecting farmland is one that is not easily changed at the whim of shifting political interests; it is well-entrenched in acts of legislation, policy, and governance structures that are based on clear, concise language, and can hold up to court challenge. A key element of stability is a clear statement of purpose regarding farmland protection among the primary goals and objectives within each enforceable document. Thus, stability is a critical measure of the strength of an agricultural land use planning framework.

The OCPs, as enforceable legislation, are the foundation of stability for the local framework. The OCP is supported by the zoning bylaws, which provide regulations for designated agricultural land uses, thereby contributing to the stability of the framework. Although the OCPs include prominent statements about the support for the general objectives of the ALC to protect farmland, as noted above, the absence of a *direct* commitment by the Board to farmland protection reduces its level of influence and, thereby, the contribution of this commitment to the overall stability of the framework. Thus, this aspect of stability is of moderate strength with the RDFFG framework. The absence of an enforceable agricultural plan, i.e., one that was named in the OCPs as a guiding document, also limits the stability of the overall framework. This situation could change as an outcome of the regional agricultural planning initiative. The

Robson Valley LRMP, although not strictly an enforceable policy, contributes to the stability of the framework, as it regards the agricultural use of Crown lands. By these terms, the stability of the RDFFG legislative framework for agricultural land use planning is moderate overall.

Minimise uncertainty

The presence of uncertainty, typically introduced via ambiguous language, exceptions or gaps, is a critical measure of the weakness of an agricultural land use planning framework. Thus, in addition to maximising the stability of a legislative framework through enforceable policies, people want to know they can rely on these rules and regulations to be applied consistently under different circumstances.

Overall, the RDFFG does a very good job of minimising uncertainty. The language is clear and consistent both within plans and across plans. For example, as discussed above, there is a high level of consistency regarding agricultural land use planning, including the statements of Agricultural Objective and Land Use Policies. However, the RDFFG's support for non-farm uses in some parts of the region (e.g., the fringe areas of Prince George, McBride, and Valemount) does contribute to uncertainty about the Board's commitment to protecting its agricultural land base, especially when each policy statement is taken in isolation. This perspective is more evident in the Board's practices than in its policies, as suggested by the results of the ALC review of delegated decisions. This perspective is also consistent with the Board's recently stated position on the amendments to ALC Act.

The following statement, which appears under Implementation – Agricultural Land Commission, is interesting in the context of minimising uncertainty.

However, in consulting with the Agricultural Land Commission in the development of this Plan, it is understood that the Commission does concur with the content of the Plan, thereby setting a level of certainty of the nature of future development directions in the Plan area.

This statement appears to be an attempt to insert “certainty” into the framework. At the same time, it may be interpreted as an attempt to assert the primacy of the OCP over the ALCA, but this is not acceptable. As the Delegation Agreement states, “Where there is an inconsistency between the objects of the Act and the objects of an approved OCP or a rural land use bylaw, the object of the Act must take precedence.”

Where non-farm uses or subdivision of agricultural land may be permitted, such statements are supported by conditions that uphold the importance of maintaining agricultural lands and activities, as well as the policies of the ALCA, while impacts on agricultural lands must be minimised. This use of policy is an effective means to recognise possible exceptions while minimising uncertainty.

Integrate across jurisdictions

Integrating policies and priorities across jurisdictions is a foundation for building cohesion across provincial, regional, and local governments. One can also think of integration as a formal “linkage” that provides consistency among them. In order to successfully integrate policies

across jurisdictions there must be sufficient details about the legislative context that guides and constrains local government plans and strategies. By this measure of integration, we found that a lack of integration is one of the weaker aspects of the RDFFG legislative framework.

The ALC Act, with the corresponding responsibilities of the ALC and the presence of the ALR, is well recognised in the local legislative framework. In this regard, the section under Implementation that clearly states the role and function of the ALC is noteworthy. This strong element of integration is offset by the absence, either in whole or in part, of other relevant pieces of legislation. For example, the *Farm Practices Protection (Right to Farm) Act* is cited primarily in the context of agricultural waste management. However, the primary purpose and scope of this Act, which is to support the rights of farmers to farm and to protect them from nuisance complaints, is not integrated within the OCPs.

Accommodate flexibility

Creating an effective legislative framework is an act of balance, without being too stable so that it cannot be changed when needed or too strict so that it cannot be applied in a range of circumstances. Thus, flexibility is necessary in order to moderate the restrictive effects of maximising stability and minimising uncertainty. The means to accommodate flexibility is typically done through governance mechanisms.

There is no AAC in place within the RDFFG; instead, the ALUSC fills the role of an AAC and makes recommendations to the REDFFG Board. Under the Delegation Agreement, the Regional Board performs the delegated duties of the ALC's North Panel. In this context, the ALUSC, which serves the whole region, is able to consider agricultural land use decisions in a broader context and accommodate the needs of particular areas. Still, there are two related elements of concern that may undermine flexibility. One is that the members of the ALUSC are the same members of the Regional Board. The other is that there is no explicit requirement that members of the ALUSC have knowledge of farming or agriculture. Together, these limiting factors take away the benefit of having a standing committee with a focus on agriculture that is distinct from the interests of the Regional Board.

The structure of the OCPs helps to accommodate flexibility within the framework. In this regard, the high level of consistency among policies among the OCPs is complemented by sections that set forth areas that require specific development and servicing policies. These sections include Rural Communities and Special Management Areas. In these sections of the OCPs, the specific needs and interests of defined areas are clearly stated and supported by policy statements that are designed to accommodate differences. The recognition of Dunster as a rural "agricultural community" that should retain larger lots and lower residential densities is an example of how flexibility is accommodated for one unique situation within the region. The different policies for the different fringe areas are also examples of flexibility. Such policies accommodate flexibility without unduly compromising the stability of the framework or contributing unnecessarily to uncertainty.

Influence of policy regimes

The legislation and policy documents of the RDFFG cover all three policy regimes (Table 24). Based on our analysis, farmland preservation is considered the most influential given its presence within the RDFFG OCPs, as discussed throughout this report. Notably, though, the loss of agricultural land is not identified as a concern. Most of the influence from the regimes of global competitiveness and food sovereignty arises from the OBAC Agriculture Sector Strategy. Although the breadth of references to these regimes looks more prevalent in the tables, the OBAC strategy is an aspirational policy and does not appear to be a significant influence on agricultural land use policies. Food sovereignty is presented in two contexts: health and social services, and local food systems.

Table 24. Regional District of Fraser-Fort George, Fraser Valley-Canoe Downstream

Policy Regime	Vision, Goals, Objectives, Recommendations	Driving Issues, Concerns	Regulations	
Global Competitiveness				
Farmland Preservation				
Food Sovereignty				

Conclusion

Overall, the legislative framework for protecting farmland within the Regional District of Fraser-Fort George is of moderate strength. The RDFFG demonstrates a high interest in supporting the agricultural sector across the region as part of its economic diversification. Within this context, protecting farmland is supported by the Regional District through its OCPs and bylaws, but farmland preservation is not recognised as a particular issue or priority. What makes the situation complicated is that the RDFFG has a Delegated Agreement with the ALC, an agreement that requires the RDFFG to protect all agricultural lands and encourage farming as the best use of these lands. The effect is some divergence between protecting farmland and keeping options open to pursue economic diversification, which is reflected in different ways within the local legislative framework.

Within a local legislative framework, the OCP is the prime source of stability. Thus, it is appropriate to examine OCPs to assess the level of commitment to protecting farmland and how this fits within the land use planning framework. Here we find that the RDFFG states, as its Agricultural Objective, support for the general objectives of the ALC to protect farmland could be stronger. The strength of this statement is moderate because it is not a direct commitment by the RDFFG to protect farmland. A stronger, direct commitment to protecting farmland would complement other important strengths of the framework, including the high level of intra-plan consistency and effective accommodation of flexible policies within the structure of the OCPs without introducing unnecessary levels of uncertainty.

Intra-plan consistency is a stated objective in all OCPs, and for agricultural land use planning, one effect is to minimise uncertainty. In this regard, the RDFFG is very strong. Each OCP, with minor variations, includes three sections that collectively provide a comprehensive policy to direct agricultural land use decisions. These sections are a statement of agricultural objective, land use policies for agriculture, and a land use designation that recognises agricultural lands. The consistent use of these sections with consistent language helps to minimise uncertainty.

The integration of public priorities across jurisdictions is a weak aspect of the RDFFG legislative framework. The opportunity for all local governments to strengthen its legislative framework is to integrate a local commitment to protecting farmland with the provincial priority. A suite of legislation, regulations, and policies are available for this purpose. The RDFFG does not take advantage of this opportunity.

The RDFFG does an effective job of accommodating flexibility within its framework. This is achieved primarily through the Rural Communities and Special Management Area designations that address specific service and policy needs of defined areas. As a principle, accommodating flexibility is best done in the context of a framework that is stable, minimises uncertainty, and integrate priorities across jurisdictions. However, in the absence of a strong framework, flexibility can serve to undermine rather than serve public priorities. For the RDFFG framework, accommodating flexibility combines with a moderate commitment to protecting farmland and minimal integration with provincial priorities to protect farmland, which has the potential to weaken the framework as a whole. Herein, there is the potential for the divergence between protecting farmland and keeping options open to pursue economic diversification may have a negative impact on the agricultural land base.

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Glossary

Policy:

A formal statement of intent; principles, rules, or guidelines that are designed to determine or influence major decisions or actions and all activities that fall within the domain of the policy.

Enforceable policy:

Policy with clear statements of intent to enforce (often with penalty for failing to follow the policy)

Aspirational policy:

Policy without clear statements of intent to enforce (often with penalty for failing to follow the policy); a broad statement about desired outcomes, objectives, or activities

Enabling policy:

Policy with clear statements of intent to implement a policy (e.g., provide resources)

Policy regime:

A policy regime and its changes refer to the combination of issues, ideas, interests, actors and institutions that are involved.

Legislation:

A law (or Order in Council) enacted by a legislature or governing body; can have many purposes: to regulate, to authorize, to proscribe, to provide (funds), to sanction, to grant, to declare or to restrict.

By-law (bylaw):

Local laws established by municipalities as regulated by the provincial government. Note: for our purposes, a by-law is considered part of legislation.

Regulation (pursuant to Act):

Is a form of legislation (law) designed with the intent to regulate; a rule or law designed to control or govern conduct; creates, limits, constrains a right, creates or limits a duty, or allocates a responsibility.

Governance:

Methods, systems, or processes of governing; the act of implementing policy and legislation. For our purposes we are concerned with groups (e.g., commissions, advisory committees) that have the authority to apply, review, or enforce policy and legislation specific to agricultural land use planning.

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Appendix: Criteria for Evaluating Content of Legislative Framework

Legislation documents

	Legislative Context (Provincial)	Background	Vision, Goals, Objectives	Local policies	Maps
0	None	None	None	None	None
✓	Brief statements that include at least one reference to the main provincial legislation or policy related to agricultural land use planning. Little too context provided other than perhaps a statement that acknowledges the local governments duty to uphold these acts and policies.	Very brief description of agriculture background. This may include a minimal section or statistics on historical context, background and issues, and demographics on agriculture/farming.	Includes a vision, goal, or objective for agriculture but with minimal explanation or rationale.	One or two brief statements about agricultural land use policies, perhaps with little context.	Provides at least one (1) general land use map(s) with agricultural land use shown.
✓✓	Expanded statements that reference more than one of the main provincial legislation and policies and provides added context to the above. Multiple statements that outline how provincial legislation and policies “fit” in the local context.	Includes multiple sections dedicated to information and statistics about agricultural background. May also reference an agricultural plan or report.	Includes a vision, goal, and objective for agriculture with a statement of explanation and some action items.	Several statements (three to five) about agricultural land use policy presented within local context. May also reference an agricultural plan.	Provides at least one (1) general land use map(s) showing agricultural land uses and at least one (1) agriculture specific map showing designated agricultural land.
✓✓✓	Comprehensive that outlines how provincial legislation and policies “fit” in the local context.. May include diagrams to help establish thread of consistency among different levels of government.	Comprehensive account of agricultural background . May also reference an agricultural plan or report.	Includes a detailed section on vision, goals, and objectives for agriculture that outlines a rationale and action items. May also document relations with other land uses and local priorities.	Detailed section of agricultural land use policy statements (more than five) or agricultural sub-area plan adopted as by-law. May also reference an agricultural plan.	Provides two (2) or more agricultural land use maps including a map showing designated agricultural land. May also include Other maps to illuCRDte specific issues or policies (future areas of study, development permit areas, current land tenure).

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Policy documents

	Legislative Context (Provincial)	Background	Vision, Goals, Objectives	Local Policies	Maps
	Same as above	Same as above	Same as above	Different	Same as above
0	None	None	None	None	None
✓	Brief statements that include at least one reference to the main provincial legislation or policy related to agricultural land use planning. Little to no context provided other than perhaps a statement that acknowledges the local governments duty to uphold these acts and policies.	Very brief description of agriculture background. This may include a minimal section or statistics on historical context, background and issues, and demographics on agriculture/farming.	Includes a vision, goal, or objective for agriculture but with minimal explanation or rationale.	Several statements (three to five) about agricultural land use policy presented within local context.	Provides at least one (1) general land use map(s) with agricultural land use shown.
✓✓	Expanded statements that references more than one of the main and policies and provides added context to the above. Multiple statements that outline how provincial legislation and policies “fit” in the local context.	Includes multiple sections dedicated to information and statistics about agricultural background. May also reference an agricultural plan or report.	Includes a goof presentation of vision, goal, and objective for agriculture with a statement of explanation, a few recommendation items, and some action items.	Comprehensive section of agricultural land use policy statements (more than five).	Provides at least one (1) general land use map(s) showing agricultural land uses and at least one (1) agriculture specific map showing designated agricultural land.
✓✓✓	Comprehensive that outlines how provincial legislation and policies “fit” in the local context.. May include diagrams to help establish thread of consistency among different levels of government.	Comprehensive account of agricultural background. May also reference an agricultural plan or report.	Includes a detailed section on vision, goals, and objectives for agriculture with an extensive and detailed list of recommendations and/or action items.	Comprehensive agricultural plan. May also refer to background report.	Provides two (2) or more agricultural land use maps including a map showing designated agricultural land. May also include Other maps to illuCRDte specific issues or policies (future areas of study, development permit areas, current land tenure).

Appendix: Criteria for determining level of influence of policy regimes

		Placement (significance) within Document			
		Aims, Goals, Objectives	Mission, Vision, Mandate, Purpose	Driving issues, concerns	Action items
Level of influence	High influence	A clear, explicit statement as part of a short list (three to five) of items in an enforceable policy or regulation	A clear, explicit statement at the highest level of an enforceable policy or regulation		
	Medium influence	A clear, explicit statement as part of a short list (three to five) of items in an aspirational policy	A clear, explicit statement at the highest level of an aspirational policy	A clear, explicit statement as part of a short list (three to five) items in a policy	A clear, explicit statement as part of a short list (three to five) of items in a policy
	Low influence	A clear, explicit statement as part of a long list of items in an aspirational policy		A clear, explicit statement as part of a long list of items in an aspirational policy	A clear, explicit statement as part of a long list of items in a policy