

Good afternoon Mayor, Councillors and staff. I am here today because timelines were too tight for a written report (and frankly you have too much to read) and because for us, report PL-37-22 is not alarmist enough on some key issues. Your focus has been on urban planning and intensification, which is critical, but Ag and NHS Policy Directions are also before you, and I'm here to suggest they are JUST as critical, and in our view are JUST as damaging as was paving 5000 acres of farmland.

Regional Planning staff, in this ROPR process have not aspired to correct the fundamental problems of ROPA 38, and while they have thrown municipal agriculture some "bones" in the form of on-farm diversified uses and agriculture-related uses, without a paradigm shift those "bones" will amount to little to no agricultural support in Burlington or the Region.

Three members of BARAAC participated in the Regional Agricultural Working Group and spent hundreds of hours with planning staff to address the crux of the problem. It didn't budge the needle. So now we're here to ask for your help, and staff's help to try to create the paradigm shift we need before ROPA policies are born from this Directions Report.

So here's the crux of the problem - the same crux by the way that we proposed to solve through what we've presented previously to you as "modified option 2" if you'll recall that - is what I'm going to reframe using the Direction's report language as the RAS1/NHS6 problem.

Regional staff have proposed three land use designations, as permitted by the province and under the auspices of trying to get land use permissions to a simpler "yes/no" answer. There would be "prime ag", as designated by the province, Key features, - SOME mapped and designated by the Province and some made significant and designated by the Region - and Rural Lands, those rural areas that are neither Key Features or Prime Ag.

The rest of the Natural Heritage system would be an overlay to those designations. On the face of it, that seems sensible and clear and all of us want a simpler "yes/no" planning process. But here's the first problem and I'll call it the FALSE EQUITY PROBLEM

Key features were originally intended to restrict Urban Style Development, not what I'll call "As of right development" like agricultural buildings on agricultural land. There are certainly some key features, like valley lands and wetlands - mapped and protected by the province through the NEC for example or Conservation Halton or the MNR - that should never be developed for any reason, but there are other Key Features, and we like to use table land woodlands as a good example, that should NOT restrict agricultural development. So, the FALSE EQUITY PROBLEM is that these key features are not equal and should not all hinder as of right development.

And this is not splitting hairs. I'd like to draw your attention to the Region's ROPA map 1E. The dark purple is our Regional Prime Ag area, and the lighter purple is what the Region would designate as Rural Area, still very useful farmland in our ag system.

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The next map shows, in pleasing dark green, the provincial and regional Key Features. The purple, are prime ag areas that fall within the larger NHS overlay. I'm going to change the colours up a bit to make a point.

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This map shows Key Features in red because that's where the Region wants to designate that agricultural development CANNOT occur. Period. The orange around it, the remainder of the NHS would have other implications as an overlay like perhaps, restrictions on those "bones" I mentioned earlier or perhaps, permit those things but only with costly environmental impact studies and permit processes that could take YEARS. Again - not being dramatic - EIA's can take years to encompass seasonal variations.

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So here, graphically, is the FIRST RAS1/NHS6 problem. This isn't a "yes/no" planning process, this is a "no" planning process.

But this isn't where the problems stop. We next have what I'm going to call the PROPORTIONALITY PROBLEM. In order to implement this plan - there will have to be some LEGAL mechanism, as yet unresolved by Regional or City staff, to enforce the restriction of development on Key Features because many of the Regional Key Features are undefined and can't be mapped or zoned without the EIA studies I mentioned. Municipalities would have to look to something like site plan control for agriculture in order to make this paradigm work. Site plan control on as of right agricultural buildings - not exactly supporting agriculture is it?

This paradigm also creates a massive PROCESS PROBLEM, particularly in Burlington because planning staff at all levels comment on all NEC development applications, so we have a situation where Key Feature studies and prohibitions and NHS studies and restrictions can be imposed cart-blanche by staff with no oversight, no approval time-lines and no appeal process other than Ontario Land Tribunal. Remember, we're not even sure where these key features are until their studied and mapped - Talk about RED TAPE

I could go on. I hope the point I'm making is that even from a high level, the Directions Report has us headed in the wrong direction. Policies that flow from this cannot correct the fundamental RAS1/NHS6 problem IF Agriculture in Burlington and Halton is going to survive.

The directions report also talks about responding to the impacts of climate change by supporting on-farm stewardship. This chafes in so many ways. Firstly, the RAS1/NHS6 Paradigm profoundly punished on farm stewardship. When we took over our farm in 2009, we planted 1000's of trees and created a meadow habitat beside our woodlot. Those trees, that meadow and that woodlot will, under this paradigm severely curtail our ability, and any future farmers ability to run a viable urban fringe farming operation. So my stewardship to support the health of my farm, has in fact damaged my farm - supporting on farm stewardship under this planning regime is frankly laughable.

Secondly, Farming is literally seasonal carbon sequestration! One of the best ways to fight climate change is to keep farming viable. If farming is viable, farmers continue to be able to own the land, and the INDUSTRY of small scale farming sequesters your carbon and protects soil. If we permit agricultural development, we permit on-farm processing, we create local, farm to plate agriculture, we increase food security, and we fight climate change. Staff seem to continually miss this lens. Why would we fight to protect a mature tree line and condemn farmland and farming that could easily get us so much further towards our climate goals?

In conclusion, this is not a “mapping refinement” issue. BARAAC, uncharacteristically, does not have a solution or even a motion before you today because timelines on this have been extremely tight. But we do need to pump the breaks. If policy is built based on these directions, farming will simply no longer be viable in Burlington. Period.