# **COMMENTS RECEIVED FROM AGENCIES AND MUNCIPALITIES**

## PRRD Bylaw Enforcement

There is no active Bylaw Enforcement file on this property.

## <u>PRRD GIS</u>

No concerns.

Charlie Lake Fire Department

Interests unaffected.

City of Fort St. John

Approval not recommended. See attached letter.

### Ministry of Agriculture

This proposal is not in the best interest of agriculture in the long term. See attached letter.

Agricultural Land Commission

No objection.

<u>BC Hydro</u>

No comments.



January 3, 2023

#### Re: PRRD Referral No. 19-201 ZN

The City of Fort St. John thanks you for the opportunity to provide comment on this application and notes the following items for consideration:

- As per the NPFA OCP No. 2460, 2022 "According to BC Assessment, the combined total of industrial and commercial vacant land is about 200 ha within the North Peace Fringe Area, not including the City of Fort St. John and District of Taylor."
  - Does the current industrial land need and demand in the Peace River Regional District (excluding municipalities) justify or explain this proposed land use change?
  - What policy support is there to develop existing industrial-zoned land before other land is converted to industrial land?
- The amendment to Light Service Industrial is inconsistent with surrounding active agriculture operations and may have the potential to adversely affect the agricultural land. The City would like to know if there is a plan to buffer the Light Service Industrial uses to minimize conflicts with adjacent agricultural lands.
- The City supports a planned and principled approach to further light industrial development, and sees this
  as an opportunity for consideration as part of the growth management strategies as identified in the
  NPFA OCP No. 2460, 2022.
  - "In partnership with the City of Fort St. John and the District of Taylor, the Peace River Regional District will work towards creating an industrial land strategy to evaluate existing supply and to forecast the need for additional industrial land in the North Peace Fringe Area, taking into consideration any relevant strategies that have been created by these partner municipalities."
- This property is within the Charlie Lake Fire Protection area, whom with the City of Fort St. John Fire Department has a mutual aid agreement. This proposal does not provide information to determine if appropriate fire response requirements are adequate. Consideration must be given to ensure fire apparatus response requirements such as access and turnaround routes are met.
- There have been examples of previous fringe area development that did not consider fire apparatus access including turnarounds nor adequate water supply for fire protection. These include the recent Enterprise Road Development and the older MacLean Road Development. The City believes that encouraging industrial development in areas without adequate on-site water supply for fire response and apparatus access necessary may increase the risk to fire fighters, on-site improvements and surrounding properties.

• Does the construction of the building intended for the light industrial use meet BC Building code requirements to support the intended use? ie: fire suppression, occupancy, etc.

Sincerely,



Charlene Jackson, Planner I Planning and Engineering Department City of Fort St. John



January 23, 2023

Local Government File: 19-201 ZN

Ashley Murphey, Planning Services Manager Peace River Regional District (PRRD) VIA EMAIL: <u>Ashley.Murphey@prrd.bc.ca</u>

# Re: Zoning Bylaw Amendment – 8425 Old Fort Road (PID 017-498-937)

Dear Ashley Murphey,

Thank you for providing the Ministry of Agriculture and Food (Ministry) with the opportunity to comment on the proposed zoning bylaw amendment to rezone a Large Agricultural Holdings (A-2) 2.04-hectare non-Agricultural Land Reserve (non-ALR) parcel, to Light Industrial (I-1), consistent with the recently adopted North Peace Fringe Area Official Community Plan (OCP) (Bylaw No. 2460, 2021).

Ministry staff offer the following comments:

- The subject parcel is close to the City of Fort St John south-west boundary, with smaller parcels within the City to north-east and larger parcels outside the City to the south-west. While the subject parcel is not in the ALR, it is surrounded by ALR parcels with active farming taking place along its southern and western boundaries. The minimum parcel size for A-2 zones is 63-hectares and 1.8-hectares for I-2 zones, as per Regional District Zoning Bylaw 1343, 2001.
- Based on B.C's <u>Soil Information Finder Tool</u> (SIFT) the lot is composed of moderately well drained silty clay, silt loam, and silty clay loam. It has an agricultural capability rating of 2C. Lands with an agricultural capability rating of 1-3 are considered prime agricultural lands with only slight to moderate management limitations. They can be managed and cropped with little difficulty. The subclass rating of 'C' indicates an adverse climate, which may cause other mild management limitations.
- Ministry staff note that while Agriculture is a permitted principal use in the existing A-2 zone, it is not a permitted use in the proposed I-1 zone, effectively removing this parcel from potential farming if approved. The proposed rezoning may also

raise the parcel's value, making it harder for farmers wanting to access it. And while the Zoning Bylaw's Agricultural Industrial zone (I-3) includes abattoirs as a permitted use (in addition to other specified farming related uses), the I-1 zone does not (although it does allow meat cutting and packing). This proposal is not in the best interest of agriculture in the long-term.

 Ministry staff further note the Regional District's OCP's section 9 Industrial Land Use provisions which help support minimizing potential issues between adjacent land uses, and landscape buffering opportunities on the subject parcel. OCP section 9, Industrial Policy #8 specifically mentions the B.C. Government's <u>Guide to</u> <u>Edge Planning</u>. More information on level 2 buffers along the urban side of urban/agricultural boundaries can be found on page 22 of this Guide. The Regional District may wish to consider reviewing these items with the applicant, if the proposal is approved.

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

Sincerely,

Gregory Bartle Land Use Planner Ministry of Agriculture and Food Phone: (778) 974-3836 Email: <u>Gregory.Bartle@gov.bc.ca</u> Brenna Schilds, P. Ag Regional Agrologist- BC Peace Ministry of Agriculture and Food Phone: 250-795-4101 Email: <u>Brenna.Schilds@gov.bc.ca</u>