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Hamilton

September 25, 2017

Helma Gerts
Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division
Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph Ontario
N1G 4Y2

Dear Ms. Gerts,

Re: Comments from the City of Hamilton – EBR posting #13-0968

Please find attached staff comments from the City of Hamilton. City Council will be formally considering staff's recommendations on the Implementation Procedures for the Agricultural System in the Greater Golden Horseshoe, the associated mapping, methodology and the Agricultural System portal at their October 24, 2017 meeting.

City staff have reviewed the documents listed above and have the following comments:

LEAR Mapping and Methodology

City staff strongly object to the Provincial LEAR methodology and mapping that has identified approximately 12,000 hectares of land to be redesignated and will be required rezoned from rural, open space, utility and mineral aggregate extraction designations/zones to Prime Agricultural areas for the following reasons:

1. The proposed mapping changes undermine rural economic development in the City by removing 6,500 hectares of land zoned for rural purposes. These areas are to be used for agricultural related, resource based commercial/industrial, existing commercial/industrial and other uses supportive of rural communities (i.e. institutional). In addition, it undermines the stated goal of the Province to support agriculture through a robust agri-food network by removing lands that could be used for these purposes;
2. In 2011, the Ontario Municipal Board approved a settlement between the Province and the City respecting the Rural and Agricultural designations within the Rural Hamilton Official Plan (RHOP);
3. In 2015, the City completed an extensive and controversial public process to develop new zones for the rural area. The current zoning and RHOP mapping and policies conform to the intent of the revised Greenbelt Plan by creating an agricultural land base that protects prime agricultural lands and identifying other

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lands for larger agriculturally related and other rural type uses. The minor changes to the RHOP policies that are required to conform with the updated Greenbelt Plan can be undertaken without eliminating the planning work that has been done at the local level;

4. There are a number of existing land uses within the rural area that are considered as non-agriculture uses (Conservation areas, golf courses, quarries) and redesignating these lands to Agriculture would not reflect the current land use, makes all the uses legal non-conforming and does not reflect the reality of the rural area; and,
5. The Provincial LEAR has removed local decision making for the rural area by imposing land use designations the City would be required to implement even if the designation does not represent good land use planning.

In addition, City staff requests the Province to:

1. Review the Specialty Crop designation, particularly for the lower Stoney Creek lands because the Area Review (AR) values assigned to these lands would result in a low LEAR score and would support the City's multiple requests for removal from this designation. At the meeting March 15, 2017 between Senior staff from OMAFRA and the City of Hamilton, OMAFRA staff indicated the appropriate time frame and process to review the specialty crop is during the Provincial LEAR process. However, the LEAR process does not include any review of these lands which clearly does not reflect the March discussions.
2. Remove the City of Hamilton from the agricultural land base mapping and the City will use their existing designations to work with neighbouring Regions to ensure as much consistency as possible of the agricultural land base at municipal boundaries.

Implementation Procedures for the Agricultural System in the Greater Golden Horseshoe

1. Staff have several technical comments on the Implementation Procedures for the Agricultural System in the Greater Golden Horseshoe, attached as Appendix "B" to Report PED15078(f);
2. Staff encourages the continued development of Agricultural System Portal as a useful mapping tool to support and promote the growth of the agriculture and agri-food sector in the Greater Golden Horseshoe;

Accompanying this letter are four Appendices that provide background to the recommendations contained in this letter:

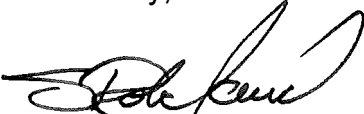
- Appendix "A"
Maps showing the differences between the City's RHOP designations and Zoning By-law 05-200 for lands greater than 100 ha.

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- Appendix "B"
Comments on the Implementation Procedures for the Agricultural System in the Greater Golden Horseshoe and the Agricultural System Portal.
- Appendix "C"
Comparison between the Province's and City's LEAR Methodology.
- Appendix "D"
OMB decision on Rural/Agriculture Designations (2011). Please accept these comments to meet the October 4, 2017 Provincial deadline for the submission of comments on the Agricultural Land Base/System.

If you have any questions, please feel free to call Joanne Hickey Evans at (905) 546-2424 x1282.

Yours truly,



Steve Robichaud, MCIP, RPP
Director, Planning and Chief Planner