

Pilon, Janet

Subject: A paint by number Ag map won't cut it

From: David Lloyd

Sent: Monday, February 3, 2025 3:14 PM

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Subject: A paint by number Ag map won't cut it

Hello Councillors and Madam Mayor,

I saw the delegation letter from Cachet developer Marcus Gagliardi on the Feb 4 Planning agenda regarding the MZO and felt compelled to show accurate mapping on "Prime Agricultural Areas". Please take a moment to look at the actual OMAFRA soil maps (attached) for the parcel and compare them with the laughable map submitted by the Upper West Side group. The UWSLG Ag assessment was completed by a company that does not exist and which did a 'windshield survey' to determine soil type. Driving around in your vehicle and looking out the window is not the way to test soil.

Thank you;
David Williams

Feb 4, 2024 Planning Cmte item 9.2 - MZO

Dear Hamilton Councilors,

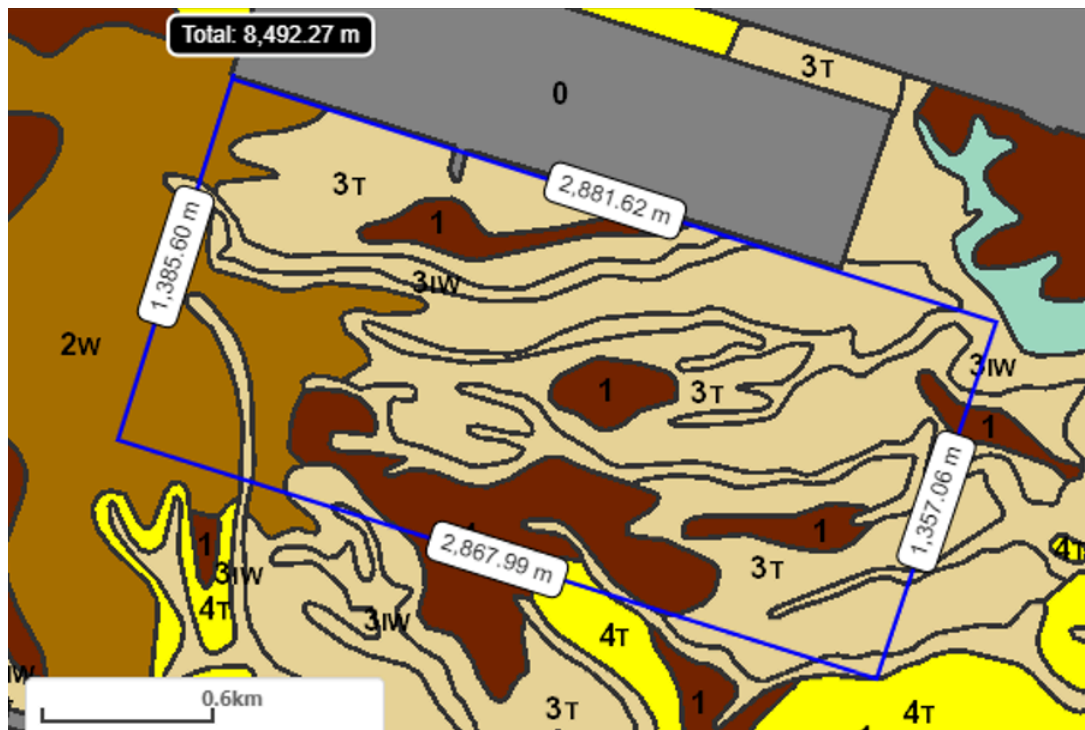
The urban boundary battle has been a long one and the community has been paying attention. Thanks to the City for:

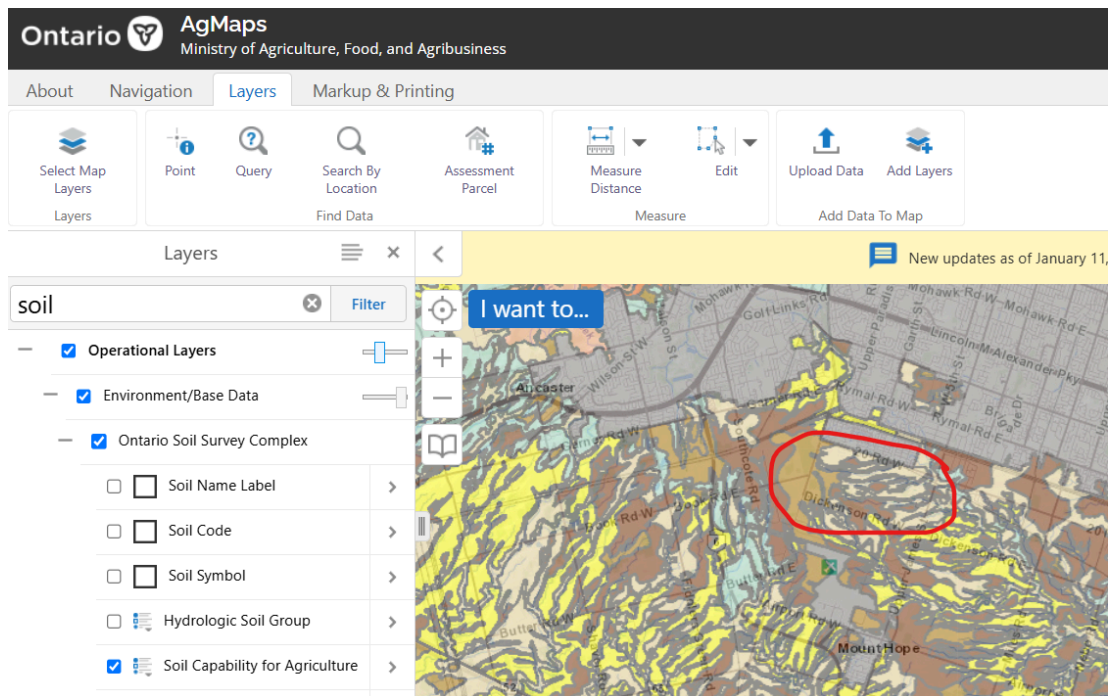
1. creating the new [Urban Boundary webpage](#) which has links to all the information Hamiltonian's need to be informed.
2. The very informative [communication report](#) on the Feb 4 Planning agenda

With this MZO the Upper West Side landowners -UWS- is attempting to force Hamilton to reverse course on a 2021 Council and community decision to avoid urban boundary expansion (UBE) and thereby avoid expensive sprawl onto prime one farmland. They also appear to have co-opted a beloved community partner, Habitat for Humanity into becoming complicit in their scheme in an apparent attempt to "charity-wash" this blatant attack on the City of Hamilton.

Prime Farmland

For everyone's information, below is the OMAFRA CLI soil map for the **UWS** parcel confirming it is comprised entirely of prime 1-3 soils. You can find the OMAFRA soil map [at this link](#)





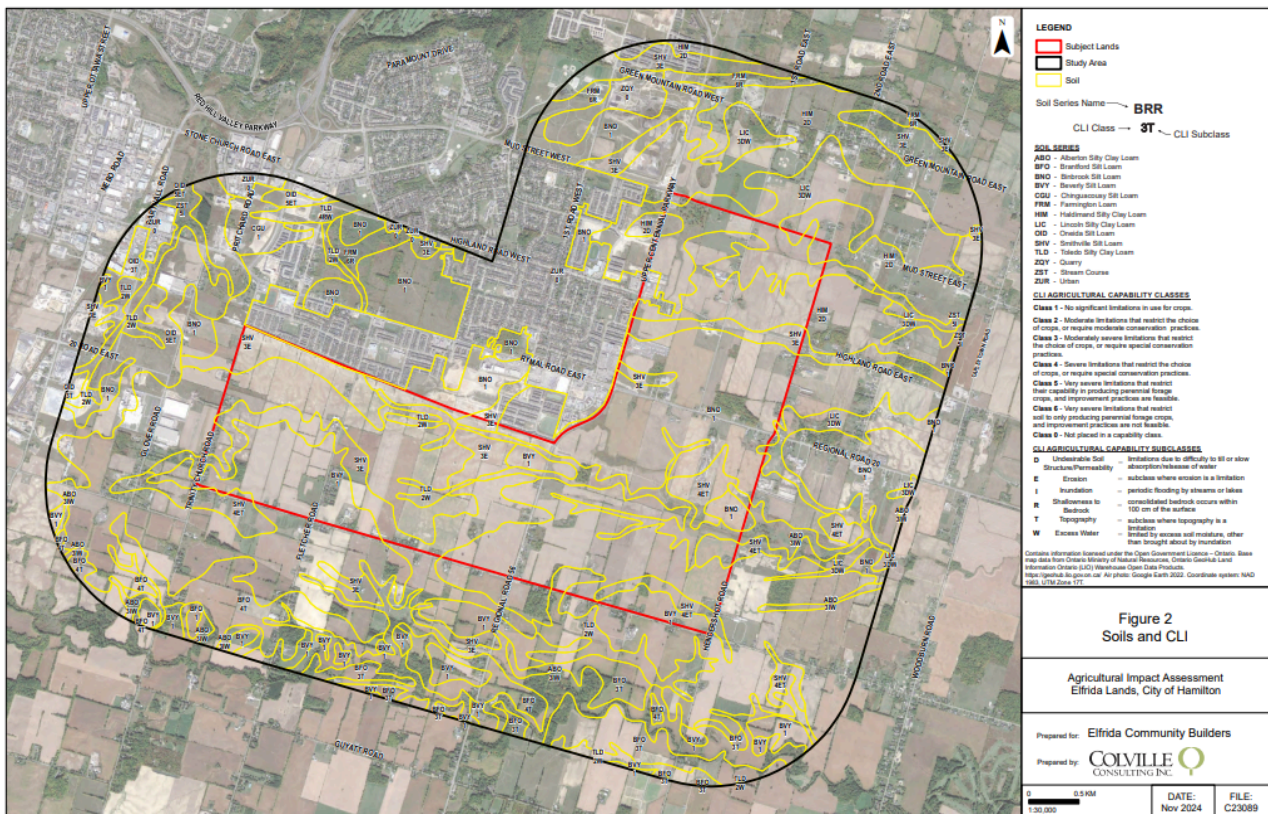
The PPS 2024 defines prime agricultural areas as areas where prime agricultural lands predominate. Prime agricultural lands include specialty crop areas and Canada Land Inventory (CLI) Classes 1, 2 and 3 soils, in this order of priority for protection. The City of Hamilton recognizes that **100%** of UBE lands are prime agricultural lands based on the [staff report](#) on Tuesday's agenda and the 2021 Agricultural Report prepared for the City by Dillon Consulting. See [Page 248](#):

Lands classifications 1, 2 and 3?

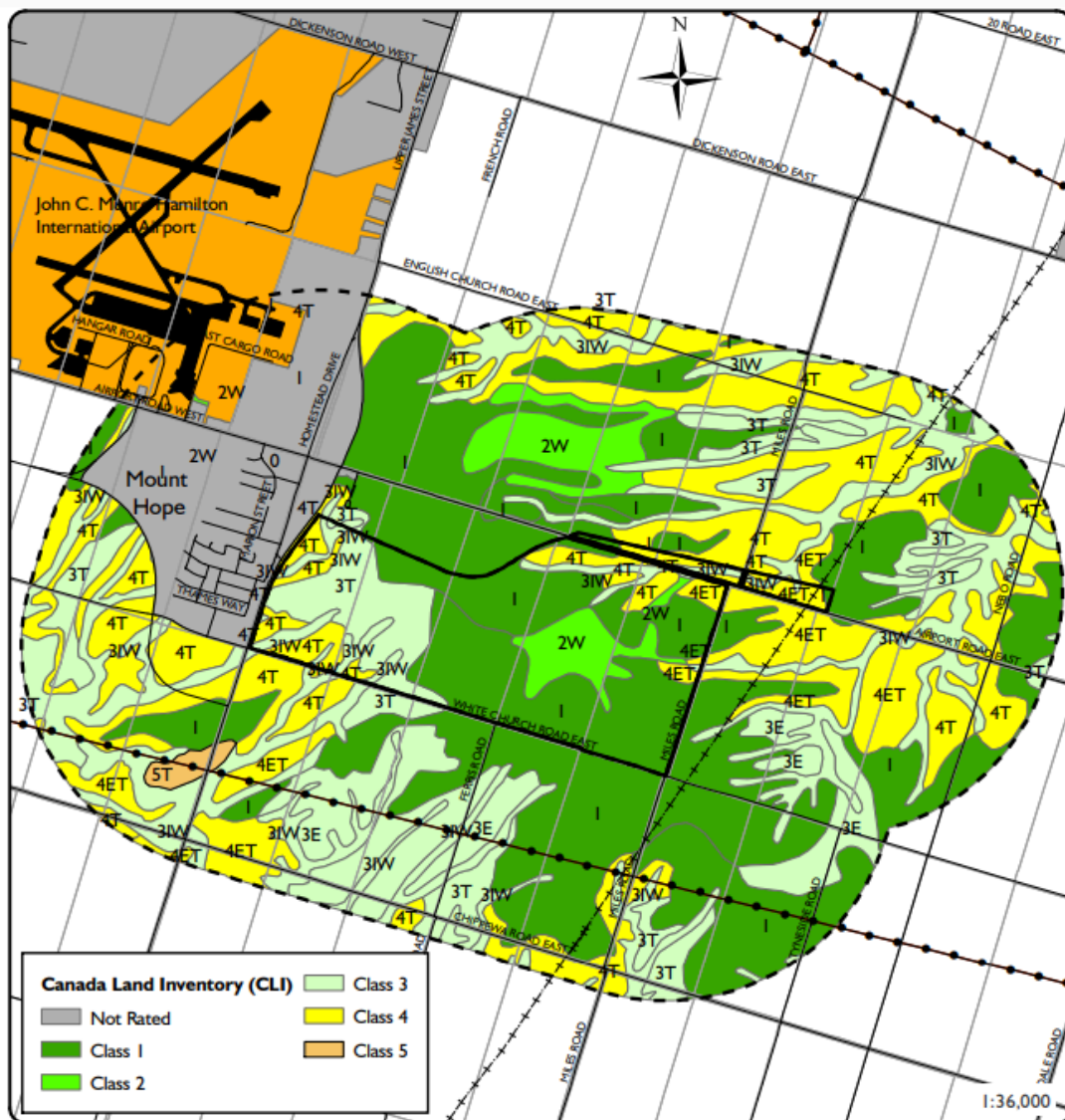
- The majority of lands outside the existing urban boundary in the whitebelt (2,197.6 ha or 100%) include soils with a Canada Land Inventory (CLI) Class 1 to 3 rating, which are considered Prime Agricultural Lands within the AIA Study Area:
 - Class 1: 1,522.4 ha or 69.3%
 - Class 2: 556 ha or 25.3%
 - Class 3: 119.1 ha or 5.4%

- Based on t
Option 1,
to avoid, r
Agricultur

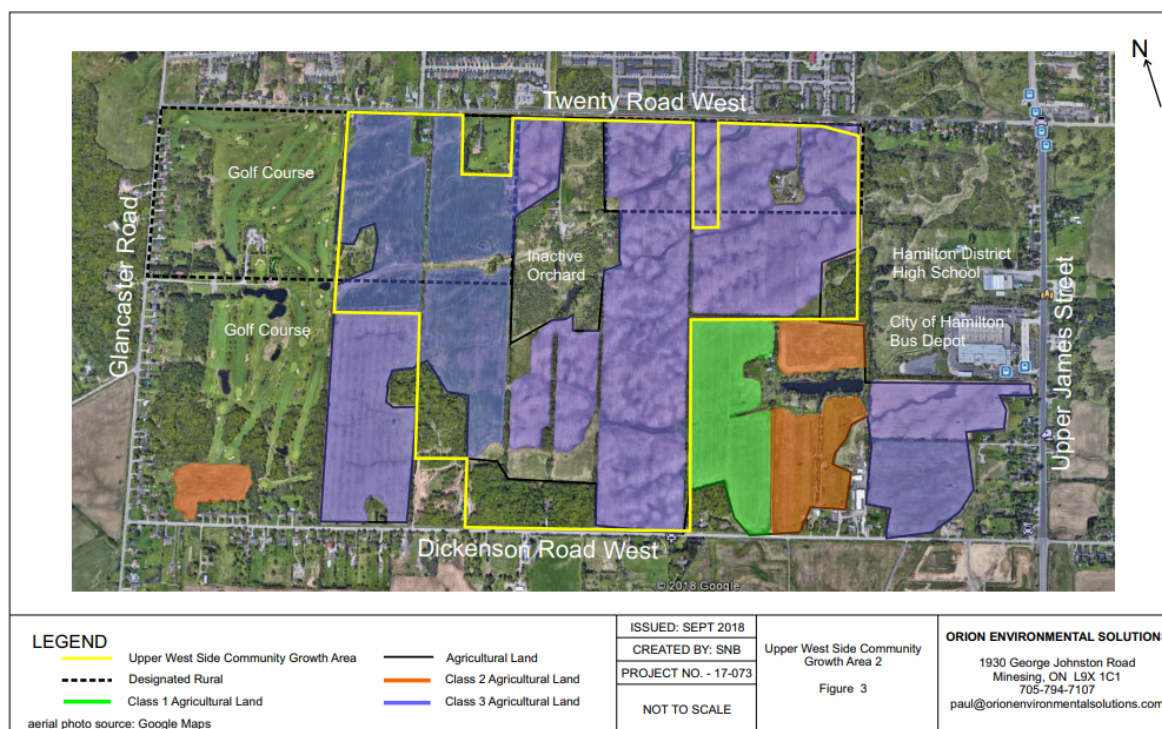
Elfrida landowners' Ag Impact Assessment includes a detailed Canada Land Inventory map confirming prime 1-3 soils on page [19/105](#).



Whitechurch landowners' Ag Impact Assessment includes a detailed Canada Land Inventory map confirming prime 1-3 soils on page [44/113](#).



Contrast these to the **UWS** Ag Impact Assessment which does not include a Canada Land Inventory map showing soil types but rather includes this curious paint-by-number map on page [30/41](#). It appears to suggest that soil types follow property boundaries. Perhaps the maker was not aware that even if this was all class 3, which it is not (see below for an accurate map), class 3 is still Prime.



The staff report says that UWS' submissions to date have been 'incomplete' presumably meaning that studies are absent or have not met the standard required. Not surprising when looking at this map.

In contrast to the other UBE studies submitted, UWS's study was based on a "windshield survey" ([see page 6/31](#)) meaning he took a drive around and made a determination on soil type and crop capability based on what he saw through his car window. This explains missing soil types from the UWS Ag Impact Assessment report, and surely is not an accepted method of assessing agricultural land?

Have a look online for the company that undertook the study: *Orion Environmental Solutions* does not exist and there is no historical record of the company online.

Hamiltonians oppose UBE

In **2021** an unprecedented 18,387 Hamiltonians responded to the city-wide survey on options for growth. See [page 9](#):

*"In response to Council direction to staff in March 2021 following the presentation of the draft Land Needs Assessment in June 2021, a City-wide mail survey was created which asked residents to choose their preferred option for how Hamilton should grow to the year 2051. In total, the City received 18,387 survey responses through both mail and email combined between June 22 and July 23, 2021 (survey end date). **The No Urban Boundary Expansion option (Option 2) was selected by the majority of respondents (90.4% of all responses).**"*

In November 2022 the Province overrode Council's firm urban boundary decision and forced an expansion onto over 5000 acres of prime farmland, only to flip-flop and reverse both their urban expansion and Greenbelt decisions a year later, in November 2023. The [November 14, 2023 Staff report](#) recommended **"That Council reconfirm its position on Urban Hamilton Official Plan Amendment 167 and Rural Hamilton Official Plan Amendment 34, as adopted by Council on June 8, 2022"** .

The recommendation was approved unanimously by each of you, reaffirming Council's position on a firm urban boundary. Note also that **688** letters from Hamiltonians against expansion appear on the 2023 agenda at item [5.1](#) demonstrating that even a full two years after first adopting a firm urban boundary, Hamiltonians are still very much engaged in saving our prime farmland by stopping sprawl.

In conclusion, please reject this MZO request and continue to oppose the expansion of Hamilton's firm urban boundary.