



addressing issues large and small

Andrew A. Bryant Services

xxxx xxxxxx Street
Powell River, B.C.
CANADA V8A xxx

Tel: 604-xxx-xxxx

email: xxxxxxxxxx@xxxxxxx

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Provincial Agricultural Land Commission

4940 Canada Way

Burnaby, BC

Canada V5G 4K6

Via Email to: Elizabeth.Sutton@gov.bc.ca

Re: Agricultural Land Reserve Exclusion (PRSC–Sino-Bright application)

Dear Commission,

I'm writing to express my opposition to the proposed exclusion of 12.1 ha (30 acres) from the ALR in order to accommodate a private school in Powell River. As a professional ecologist and permanent resident of this community, I'm concerned about:

1. the loss of agricultural potential: our region had relatively little ALR to begin with, yet proportionally and over the years we've lost more of it than almost any other regional district in the province.¹ While some of the parcel is to be retained as ALR, I question whether exclusion of some will further degrade agricultural opportunities on the remainder.
2. the apparent lack of consideration of alternative sites: there are two nearby properties, including "the old golf course", and the 112 ha of formerly-ALR that was excluded in 1994 for the express purpose of facilitating "economic development" such as this.²
3. the incremental degradation of agricultural potential and ecosystems: this can be seen in the cut-and-run harvesting practiced in 2000, and the non-permitted construction of a paved road in 2010 – both occurring on the same property under consideration.³

In a world of increasing global temperatures, persistent droughts and extreme weather events, the ALR is not a luxury. Nothing is more fundamental than maintaining the capacity to grow food. This is particularly true in a small coastal community such as Powell River, where geography provides both wondrous beauty – and great vulnerability.

I respectfully ask that the Commission refuse this exclusion request. Once removed, we're unlikely to ever get it back – or to be positioned to *really* encourage local, sustainable agriculture.

Sincerely,

Andrew A. Bryant, Ph.D., RPBio

Footnotes

1. Although Regional District boundaries have changed since ALR creation in 1975, some additional perspective can be gained by considering ALR lands either as a percentage of the land area, or as a fraction of the human population (i.e., *per capita* ALR lands). Using either metric, the Powell River Regional District started with relatively little – some 2.78% of the land area, or 0.72 ha/person. Despite a remarkably stable human population, by 2015 these numbers had fallen to 1.88% of the land area, or 0.49 ha/person. This loss rate is the 2nd highest among all Regional Districts in the Province. A further exploration of the data can be found in: [Food for thought: Powell River's ALR in context](#).
2. Publicly-available documents show little evidence that alternative sites were seriously considered by the proponent, despite this very issue being raised at public hearings. At least two possible locations outside of the ALR exist; both are of sufficient size to accommodate the proposed Sino Bright school footprint. One is owned by the same landowner and would arguably offer better access and nicer views. I've provided a historical analysis of this and adjacent properties, and a couple of suggestions, also using satellite imagery, at: [Whither Sino Bright? A brief history of the neighborhood](#).
3. A substantial portion of the ALR parcel under consideration was harvested (logged) in 2000. Sadly, while forestry is a permitted and valuable use of ALR lands, these areas were neither replanted or otherwise tended for forestry purposes. Instead the clearcut areas were simply abandoned, and are now a tangled growth of alder and blackberries with little forestry value. A decade later, while an adjacent housing subdivision was under construction in 2010, a paved access road was constructed on the ALR, creating an “effective exclusion” of ~ 0.8 ha. I can find no application to the ALC concerning that road, although it has been described by local government as a “housekeeping matter” that will be addressed by the current ALR exclusion under consideration. I've provided a historical analysis of this property, again using satellite imagery, at: [Housekeeping matters: more about the ALR](#).