

**June 27, 2022**

**Dear SCRD Board of Directors,**

Re: SCFI feedback on water rates and regulation bylaw

Thank you for this opportunity to provide feedback on the proposed changes to the Water Rates and Regulations Bylaw No 422.

The changes we propose are aligned with the [SCRD Ag Plan](#), the [SCRD's We Envision: A Regional Sustainability Plan](#), both of which refer to the need to support a local, viable and resilient food system.

The SCFI respectfully makes the following requests:

**1. Permanently exempt commercial food farmers\* from Stage 4 water restrictions.**

Water restrictions based on indoor vs outdoor water use are unfair to farmers who are required to grow food outdoors. These restrictions are not in the best interest of our communities' need for food security, nor our ecosystem's long-term health.

**2. Give commercial food farmers\* a 50% reduction on commercial water rates, including the quarterly flat rate and the additional per-cubic-meter rate charged after the flat rate threshold has been reached.**

Currently, the yearly commercial water bill for farmers with 2-4 acres in production can range from \$4000-\$6000. Given the exponential cost increases for farm insurance, seed, fertilizer and other input costs, and given the low profit margin for food crops, additional bills could mean the end for some farm operations. It is also likely to prevent new farmers from starting up on the Sunshine Coast.

Based on our research from local farms, the quarterly commercial water bills incurred by irrigating 4 acres of crops would be:

a. \$468.73 for the winter quarter

Typical winter use - 100 m<sup>3</sup> per month (100 m<sup>3</sup> x 3 months = 300 m<sup>3</sup>) billed \$131.73 per quarter plus \$337 (\$1.56 x 216 m<sup>3</sup>) = \$468.73

b. \$936.73 for the spring or fall quarter

Typical spring/fall use - 200 m<sup>3</sup> per month (600 m<sup>3</sup>) billed \$131.73 per quarter plus \$805 (\$1.56 x 516 m<sup>3</sup>) = \$936.73

c. \$2847.73 for the summer quarter

Typical summer use - 400 m<sup>3</sup> per month (1200 m<sup>3</sup>) billed \$131.73 per quarter plus \$2716 (\$1.56 x 1116 m<sup>3</sup>) = \$2847.73

### **3. Give commercial food farmers an increased threshold for the flat commercial water rate to 600 m<sup>3</sup> per quarter.**

Most crops require one inch of water per week, which is equal to 27,000 gallons or 102 m<sup>3</sup> per acre per week. This translates to the average crop farmer requiring 408 m<sup>3</sup> per month per acre or 1224 m<sup>3</sup> per quarter per acre.

Many of our local farms have 2-4 acres in production but are only using 200-400 m<sup>3</sup> for their entire farm operation each month during May to September, the months requiring the most irrigation. Our local farmers are effective at water conservation and are using far less cubic meters per acre than is standard practice.

**We request these exemptions and reductions in water rates for the following reasons;**

**1. Food is an essential human need and as such local food production needs to be protected.** At a time when [supply chain issues](#) and [food scarcity](#) looms large and our traditional food suppliers in BC and abroad are experiencing unprecedented wildfires and drought, the duty to protect and invest in local farmers who have dedicated their livelihoods to growing large volumes of food all year long is even more urgent.

**2. Farm water use is part of the hydrologic cycle and recharges the aquifer:** Soil-based farms are an important part of the green water cycle. Unlike indoor water use that returns grey/black water to sewer systems, the outdoor watering of crops stewards the water cycle. Soil filters rainwater and protects the quality of our groundwater. [Droughts are mitigated by improving soil health](#) with diverse crops and livestock that add organic matter to bring soil to life. Living soil

infiltrates rain at a higher rate and can store up to 10 times its weight in water reducing flooding and washouts.

[In 2021 Sunshine Coast forests saw 1,127,544 m3 of timbers](#) removed from our forests drastically affecting our watersheds, and our land's water absorbing capacity. Local farms can help mitigate the negative impact of the loss of forest cover and increasing urban development.

**3. Soil-based farming improves our ecosystem and reverses climate change:** Healthy soil supports ecosystems that are more resilient to the impacts of drought, flood, or fire. [Soil regulates the earth's climate](#) and stores more carbon than all of the world's forests combined (3-5 tonnes per hectare per year). [Living soil controls erosion, provides habitat for billions of organisms that fix nitrogen and decompose organic matter.](#) 70-80% of insects require the top 2 inches of soil for life. Farmers' crops, orchards and pastures sequester carbon while supporting wildlife and pollinators, which are essential to our food supply. We are fortunate that our local farmers are experts in [sustainable food production](#) and practice [many aspects of regenerative agriculture](#), such as no till, cover crops, biodiversity and incorporating well managed livestock.

**4. Local farmers are already at a breaking point** with unprecedented drought, heat domes, atmospheric rivers, labour shortages, skyrocketing input costs, and low profit margins. Losing crops and income in the most productive months while adding thousands of dollars annually in commercial water rates will push our farmers over the edge of viability and harm our local food security.

**5. Commercial farmers need equitable access to our water infrastructure.** Equality issues arise when other ALR land owners and heavy water users, such as industrial marijuana grow ops and breweries have no water restrictions simply because they are indoor operations. Farmers would be happy to use untreated water but until untreated water systems are in place, the current water infrastructure is all we have. Residential gardener's water needs can be met with current rainwater harvesting rebate programs and other water conservation practices but local commercial farmers are not entitled to these rebates, and commercial farm water needs in one week can exceed what tanks collect in one year.

Farmers, whose profit margins are far lower than most commercial businesses, pay the same property taxes and commercial water rates, and therefore have the right to equitable access to our municipal services. Farmers are one of the few commercial operations to be denied water during stage 4 restrictions. Drilled wells currently cost over \$80,000. This additional cost is simply not feasible for most farmers, especially those leasing land.

**Our proposal will have a minimal impact on the water supply and a significant, positive impact on the region's struggling local farms.**

[Only 8% of ALR land is farmed. The SCR D's own Regional Sustainability Plan](#) states "The actual land used for commercial food production may be as low as 12 hectares total," and the SCR D has determined that local farms only use 1-3% of our annual water supply.

Meanwhile, [BC reported fewer farms in last year's census of agriculture, with losses outpacing the national average.](#) The province was home to 15,481 farms last year, a decline of 10% since the last census in 2016. This follows an 11% decline in 2016 versus 2011, and contrasts with a 2% increase in neighbouring Alberta.

Simply by enacting stage 2 and stage 3 water restrictions earlier, and, in particular, by banning water use on lawns, enough water could be saved to compensate for the 1-3% used by farmers in stage 4.

**We ask our local government to take steps to protect the hard-working sector that feeds us while providing ecological services.**

Thank you for your time and consideration.

Regards,

**The Sunshine Coast Farmers Institute Board**

Raquel Kolof - President - Hough Heritage Farm

Mel Sylvestre - Vice President - Grounded Acres Organic Farm

Rose Kiewitz - Director - Henry Reed Organics

Erin Dutton - Director - Erin Dutton Design Landscaping

Dan White - Director - Farmer Dan's Family Farm

Robin Friesen - Director - Gibsons Farm

Alisha M'Lot - Director - Harvest Heart Farm

Mary Degan - Director - Hearty Homestead

Mary-Catharine Anderson - Secretary - Blaks Botanicals

Robin Dutcher - Treasurer - Soames Hill Farm

**\*The SCFI Board defines a commercial farm as:**

1. A property that grows **food** for commercial sale and;

2. A property that has earned farm classification status as per [Section 23 of the Assessment Act and B.C. Reg. 411/95](#), the Classification of Land as a Farm Regulation and/or;

3. Leased land that grows **food** for commercial sale but where the land owner has chosen to not apply for farm classification the farmer leasing the land can still prove commercial sale of food crops with receipts. This would be inclusive of farmers who lease several parcels that do not qualify for farm classification or who are new to farming and have not yet earned farm classification status.