



## **Staff Report**

**to**

## **Council**

**Date:** November 16, 2009  
**File:** 6430-04  
**Subject:** Langford's Agricultural Strategy

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### **PURPOSE**

The purpose of Langford's Agricultural Strategy is to provide a strategic implementation plan for the policies outlined in the Langford's Official Community Plan (OCP) and the recommendations provided in agricultural suitability review prepared by C&F Land Resource Consultants so that Langford can promote and support community agricultural activities, edge planning and ensure the compatibility of urban and agricultural land uses. This strategy prepared in cooperation, and at the suggestions of the Agricultural Land Commission (ALC) is also intended to assist the ALC in evaluating Langford's applications to exclude land from the ALR.

### **BACKGROUND**

At the regular meeting of Council on October 16<sup>th</sup>, 2006 Council passed the following resolution with respect to agricultural lands in Langford:

*That Council:*

- 1. Direct staff to establish a new amenity fee secured at the time of all rezoning approvals in the amount of \$500 per residential unit and \$500 per 3000 sq. feet of commercial floor area, to contribute to the ALR Acquisition Fund;*
- 2. Direct staff to undertake an agricultural viability assessment of all ALR land within the City of Langford using consultants as necessary;*
- 3. Direct staff to prepare an agricultural management strategy that would encourage Council to acquire and manage all viable ALR land identified in the agricultural viability assessment over time.*

The first part of this resolution has now been completed and implemented within Table 1 of the Affordable Housing, Parks and Amenity Contribution Policy.

The second part of this resolution has also been completed by the City commissioning a study prepared by C&F Land Resource Consultants titled "*Agricultural Suitability Review for the South Langford Plan Area*" which addresses exclusively those lands that are currently within the ALR.

Langford’s OCP contains a number of policies in Section 11 intended to promote and support the agricultural sector and food security in Langford, and provides the guiding principles of Langford’s Agricultural Strategy. A draft Agricultural Strategy has been completed for Council’s consideration.

## COMMENTS

In order for the ALC to consider Langford’s applications to remove land from the ALR, the Commission has requested that Langford develop an Agricultural Strategy. The draft Agricultural Strategy attached to this report as Appendix A was reviewed and supported by ALC staff. In their comments to Langford staff, the ALC commends Council for being “*ahead of the curve*” with respect to collecting amenity contributions towards the ALR Acquisition Fund.

Summarized below are the proposed goals and objectives of the strategy for Council’s consideration:

**Goal 1:** Increase community agricultural activities

**Objective:** Encourage a mix of community agricultural activities and food security initiatives.

**Objective:** Work with local community groups to raise awareness about local food and urban agriculture.

**Goal 2:** Protect the urban/agricultural land reserve boundary.

**Objective:** Ensure development along the urban/agricultural land reserve boundary does not preclude long term viability of farmland.

**Objective:** Increase public awareness among residents who live adjacent to agricultural land.

**Objective:** Mitigate conflict between new residential developments adjacent to ALR lands.

**Goal 3:** Provide a net-benefit to agriculture

**Objective:** Increase Agricultural Production in Langford.

**Objective:** Ensure infrastructure investment on agricultural land secured in the public trust.

Lists of specific actions are provided for each objective in order to achieve the goals and objectives outlined in the strategy. Some of the actions are already underway while others are new actions and prioritized using a scale of “low, medium and high.” Council may wish to note that the majority of actions could be carried out by staff resources and that the Agricultural Strategy is intended to be a policy document and therefore provides Council with the flexibility to amend the document to meet the current and future needs of the community.

## New Initiatives

In the strategy there are several new initiatives, identified as actions, with respect to promoting and supporting community agricultural activities, edge planning and ensuring the compatibility of urban/agricultural land uses. Described below are some of these actions to be considered by Council for implementation.

Under the *Local Government Act*, municipalities are permitted to establish Agricultural Development Permit Areas (DPA). This is a highly recommended way to ensure appropriate edge planning, and optimum land use and compatibility along both sides of the urban/Agricultural Land Reserve Boundary. Council may wish to consider creating a 100m (328 ft) Agricultural DPA measured from all ALR boundaries as of Sept 1<sup>st</sup> 2009 in Langford. If

Council supports an Agricultural DPA then Council may wish to request that staff prepare draft design guidelines for Council’s consideration that reflect this new designation.

Providing environmental impact studies prepared by qualified professionals and in accordance with the OCP are generally required of a property owner applying for a DP to work within environmentally sensitive and/or hazardous DP areas in Langford. Council may wish to request that an “Edge Planning Assessment and Buffer Plan” prepared by a registered Agrologist, Landscape Architect or Registered Professional Biologist is provided by a property owner applying for an Agricultural DP. The report should address and provide recommendations with respect to:

- ❖ Appropriate screening, landscaping, fencing, location, spacing, size and quantity of proposed and existing trees and shrubs, and lists of tree and shrub species to be planted;
- ❖ Setback of buildings from agricultural land; and
- ❖ Development and design elements that will promote compatibility (e.g. comment proposed road and lot layout, setbacks, locations of public and private open space, stormwater management, etc).

Edge Planning Assessment and Buffer Plan will assist staff in reviewing Agricultural DP applications, providing qualified recommendations in the development permits, and ensuring the appropriate measures are taken to protect the agricultural land and ensure compatibility between farm and non-farm uses.

Council may wish to consider including the following guidelines for new single-family residential subdivisions adjacent to land in the ALR in order to mitigate conflict between new residential developments proposed adjacent to ALR lands. This may also provide an opportunity to increase awareness in the development community on designing residential subdivisions that promote land use compatibility between farm and non-farm uses. The guidelines would address the following elements with respect to designing residential subdivision:

- ❖ Design road access to direct traffic away from farming;
- ❖ Have larger lot sizes along the interface with farming to provide for greater separation;
- ❖ Provide screening and landscaping buffers to protect residents from agricultural activities and in accordance with the DP;
- ❖ Greater building setbacks along the agricultural edge; and
- ❖ Provide a drainage study prepared by a Professional Engineer to ensure runoff from the proposed subdivision is contained.

In the report prepared by C&F Land Resource Consultants, it states that “*Historically, the (ALC) has considered any exclusion of land from the ALR very seriously, and is reluctant to exclude land without a corresponding and significant net benefit to agriculture to offset the loss of ALR Lands.*” Council has the opportunity to require a contributing benefit to agriculture at time of rezoning, and requires a contribution to the Agricultural Land Acquisition Fund at rezoning.

Council may wish to consider requesting the following contribution from developers as a condition of rezoning:

*Dedicate 40% of their land, or an amount determined by Council, at the time of rezoning and that these lands will comprise the highest agricultural and environmental values on the property.*

Other actions outlined in the strategy that would require amendments to policies and bylaws that Council may wish to undertake in effort to promote and support agricultural activities and food security in the community are:

- Amending Langford’s Landscape Policy, Bylaw 1201. Design Guidelines and Bylaw 500. Subdivision and Development Services Bylaw to require 10% of landscaping in private developments, parks and local streets to be edible species where appropriate;
- Amend the Landscape Policy to add the requirement that the developer provide a landscape security deposit in the amount of 100% of the estimated cost of the hard and soft landscaping and screening to be completed in the buffer area (designated DPA/edge planning area);
- Amending Bylaw 1201. DP Guidelines to require new mixed-use and residential developments with density of 100 units per hectare or greater and where residents do not have access to private yards to provide a community garden that is minimum size of 300 m<sup>2</sup> (3229 ft<sup>2</sup>);
- Amend all commercial and institutional zones to permit farmers markets;
- Allow community gardens in all zones;

### **FINANCIAL IMPLICATIONS**

Establishing a Langford Agricultural Strategy should not represent an increased cost burden to the City.

### **OPTIONS**

#### Option 1

That Council:

1. Support Langford’s Agricultural Strategy as drafted;
2. Establish an Agricultural Development Permit Area, and direct staff to prepare appropriate design guidelines for Council’s consideration;
3. Require that an “Edge Planning Assessment and Buffer Plan” prepared by a registered Agrologist, Landscape Architect or Registered Professional Biologist is submitted by a property owner when applying for an Agricultural DP;
4. Amend Langford’s Affordable Housing, Parks and Amenity Contribution Policy (Policy No. 6940-00-003) to require an applicant to dedicate 40% of their land, or an amount determined by Council, at the time of rezoning and that these lands will comprise the highest agricultural and environmental values on the property;
5. Direct staff to investigate the appropriate course of action to include the following guidelines for new single-family residential subdivisions adjacent to land in the ALR:
  - i. Design road access to direct traffic away from farming;
  - ii. Have larger lot sizes along the interface with farming to provide for greater separation;
  - iii. Provide screening and landscaping buffers to protect residents from agricultural activities and in accordance with the DP;
  - iv. Greater building setbacks along the agricultural edge; and
  - v. Provide a drainage study prepared by a Professional Engineer to ensure runoff from the proposed subdivision is contained.

6. Direct staff to amend Langford's Landscape Policy, Bylaw 1201. Design Guidelines and Bylaw 500. Subdivision and Development Services Bylaw to require 10% of landscaping in private developments, parks and local streets to be edible species where appropriate;
7. Direct staff to amend the Landscape Policy to add the requirement that the applicant provide a landscape security deposit in the amount of 100% of the estimated cost of the hard and soft landscaping and screening to be completed in the buffer area (designated DPA/edge planning area);
8. Direct staff to amend Bylaw 1201. DP Guidelines to require new mixed-use and residential developments with density of 100 units per hectare or greater and where residents do not have access to private yards to provide a community garden that is minimum size of 300 m<sup>2</sup> (3229 ft<sup>2</sup>);
9. Direct staff to amend all commercial and institutional zones to permit farmer markets; AND
10. Allow community gardens in all zones;

**OR**

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Option 2

11. Take no action with respect to the Agricultural Strategy and associated action items at this time.
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City Planner

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Senior Planner

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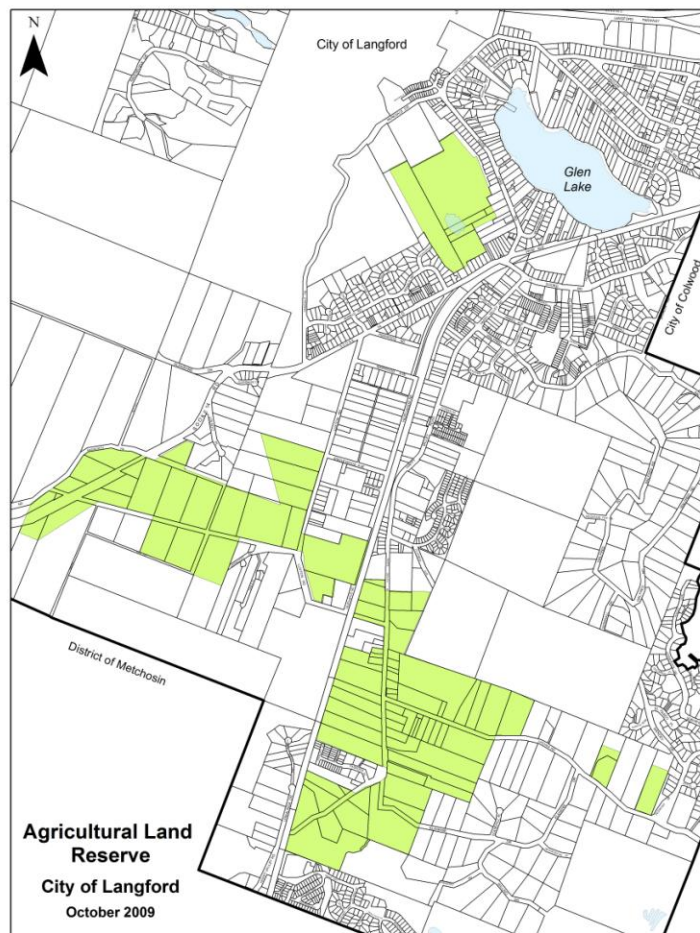
## **APPENDIX ONE**

### **Langford’s Agricultural Strategy**

#### **Introduction:**

The City of Langford embarked on a comprehensive review of Langford’s Official Community Plan (OCP) in 2006. The new award-winning OCP, adopted in June 2008, contains a number of policies in Section 11 intended to promote and support the agricultural sector and food security in Langford, and provides the guiding principles of Langford’s Agricultural Strategy.

In Langford there are 83 separate parcels of land representing 118 ha (292 acres) in the ALR (refer to Figure 1). Of these, 28 are less than 0.8 ha (2 acres), 33 parcels are between 0.8 ha (2 acres) and 2 ha (5 acres), 19 parcels are between 2 ha (5 acres) and 4 ha (10 acres) and 3 parcels are between 4 ha (10 acres) and 4.8 ha (12 acres). There are no single parcels of land in Langford that are within the ALR, and larger than 4.8 ha (12 acres). The dominant land use is rural residential, and there are only three commercial agricultural operations and several hobby farms.



**Figure 1. Lands within the ALR**

**Vision:**

Agriculture has and will continue to play a vital role in the social, environmental and economic well-being of Langford. Increasingly, food is becoming one of the most important issues to address due to its associations with human and environmental health and the economy, and its vulnerability in the face of rising energy costs and climate change. Access to safe, locally produced food and an emphasis on the environment, healthy eating and community involvement are key to long-term growth and sustainability of the agricultural and food sectors in Langford.



**Figure 2. South Langford**



**Figure 3. South Langford**

**Background:**

At the regular meeting of Council on October 16<sup>th</sup>, 2006 Council passed the following resolution with respect to agricultural lands in Langford:

*That Council:*

1. *Direct staff to establish a new amenity fee secured at the time of all rezoning approvals in the amount of \$500 per residential unit and \$500 per 3000 sq. feet of commercial floor area, to contribute to the ALR Acquisition Fund;*
2. *Direct staff to undertake an agricultural viability assessment of all ALR land within the City of Langford using consultants as necessary;*
3. *Direct staff to prepare an agricultural management strategy that would encourage Council to acquire and manage all viable ALR land identified in the agricultural viability assessment over time.*

The first part of this resolution has now been completed and implemented within Table 1 of the Affordable Housing, Parks and Amenity Contribution Policy (please refer to Appendix A). In 2008, Council increased the amenity fee contribution to \$600 or \$800 per residential unit, depending on the area in Langford.

The second part of this resolution has also been completed by the City commissioning a study prepared by C&F Land Resource Consultants titled “*Agricultural Suitability Review for the South Langford Plan Area*” which addresses exclusively those lands that are currently within the ALR.

The objectives of this study were to:

- Develop a reconnaissance soil survey of the ALR area;
- Produce a reconnaissance agricultural capability map of the ALR plan area;
- Carry out an agricultural suitability assessment for the ALR plan area;
- Assess the parcel size pattern within the plan area and suggest adjustments to rationalize land use and improve agricultural opportunities;
- Consider and suggest infrastructure improvements to enhance agricultural use;
- Suggest possible ALR boundary adjustments consistent with the agricultural suitability of the ALR lands and coexistence with proposed land use on the non-ALR lands;
- Discuss the issues of agricultural suitability, parcelization and rationalization of the ALR boundary with Agricultural Land Commission staff; and
- Consider benefits to agriculture which might be offered in return for exclusion of certain lands from the ALR and suggest a methodology for approaching the Commission to initiate the exclusions.

A copy of this report is available in Appendix B of this strategy.

### **Challenges and Opportunities**

Identified in the OCP are the following regional and local challenges and opportunities surrounding agriculture and food security that are acknowledged and taken into consideration when preparing the Agricultural Strategy.

- Food self reliance is an issue gaining some interest in communities on Vancouver Island; 5% to 10% of the food consumed on the island is grown on the island. 95% of the food is therefore imported leading to negative impacts on greenhouse gas emissions, traffic, nutritional quality of food and local economy.
- A recent community energy baseline completed for a local gulf island found that almost 40% of GHG emissions for that community could be attributed to the consumption of imported food.
- As a predominantly urban community, Langford has very little farmland; most that exists is not in production. The remaining system includes small scale growing, food stores and a Farmers' Market.
- Some small-scale farming is found on lands that are not within the Agricultural Land Reserve.

### **Purpose of Strategy:**

The purpose of Langford's Agricultural Strategy is to implement the policies outlined in the OCP and recommendations provided in agricultural suitability review prepared by C&F Land Resource Consultants that promote and support community agricultural activities, edge planning and the compatibility of urban/agricultural land uses. The strategic goals and objectives summarized below will be carried out by the City of Langford under the direction and support of Langford's Agricultural Advisory Committee and Council, and in partner with developers, local businesses and organization, and residents.

## ***Strategic Goals, Objectives and Actions***

### **Goal 1. Increase community agricultural activities**

Working with the community to provide a full range of agricultural and supportive uses that meet the needs and desires of the residents as well as encouraging value-added activities to support local farming initiatives are important elements in building a healthy and complete community.



The local economy, environment, and the health and well-being of the community are all positively impacted by increasing agricultural activities in the community.

**Objective 1: Encourage a mix of community agricultural activities and food security initiatives.**

Action Steps	Priority
That Council amend Langford’s Landscape Policy, Bylaw 1201. Design Guidelines, and Bylaw 500. Subdivision and Development Services Bylaw by requiring 10% of landscaping in private developments, parks and local streets to be edible plant species.	High
That Council amend Bylaw 1201. Development Permit Guidelines by requiring new mixed-use and residential developments with density of 100 units per hectare or greater and where residents do not have access to private yards to provide a community garden that is a minimum size of 300 m <sup>2</sup> (3,229 ft <sup>2</sup> ).	high
Amend all commercial and institutional zones to permit farmer markets.	high
Address in reports to Council for any rezoning application in South Langford where applicable, how the developer plans to promote and support local agriculture and food security initiatives.	ongoing
Amend Langford’s Affordable Housing Parks and Amenity Contribution Policy to require as a condition of density bonussing at time of rezoning that a developer pays \$600, \$800 or \$1500 per residential unit (depending on the location in Langford) and \$500 per 3000 ft <sup>2</sup> toward the ALR Acquisition.	done
Use funds in the ALR Acquisition Fund to purchase viable farm land in the ALR to be secured in a public trust and made available to individual farmers or groups on a lease basis.	high
Consider including a density bonussing provision in rezoning bylaws for multi-family, commercial and/or institutional developments that can facilitate food growing or gardening in the form of green roofs, rooftop gardens, community gardens, etc.	ongoing
Allow community gardens as permitted uses in all zones.	medium
Designate environmentally sensitive areas as Development Permit Areas in the ALR	done
Perform a cost-benefit analysis on the institution of farm tax exemption policies as a means to establish local farms.	low
Provide site selection support for food processors considering locating in the community.	ongoing
Work with local organizations to determine the feasibility of establishing a “Community-Supported Agricultural Program <sup>1</sup> ” in Langford.	high

**Objective 2. Work with local community groups to raise awareness about local food and urban agriculture.**

<sup>1</sup> “Community-supported agriculture began in the early 1960s in Germany, Switzerland, and Japan as a response to concerns about food safety and the urbanization of agricultural land. Groups of consumers and farmers in Europe formed cooperative partnerships to fund farming and pay the full costs of ecologically sound and socially equitable agriculture.” For more information please visit the following websites: [www.wikipedia.org](http://www.wikipedia.org) or [www.csafarms.ca](http://www.csafarms.ca).

Action Steps	Priority
Continue to work with Goldstream Station Market to expand the market; provide in-kind support such as closing off Bryn Maur Road (location of market) from vehicular traffic during market hours, installing and maintaining market signage and banner, providing free Trolley Service to the market and free parking, providing garbage pickup and free power, and landscaping and floral displays; and increase public awareness around local agriculture and food security initiatives.	ongoing
Continue to provide in-kind support to the Luxton Fall Fair, Luxton Rodeo, and other community events and initiatives that build awareness around local agriculture and food security initiatives.	ongoing
Work with partners to jointly develop and establish a region-wide branding strategy (e.g. “Locally Grown,” “Buy Local”/”Taste of the Region”).	low
Continue to consider and support local community organizations who apply for a grant to undertake local food security projects in Langford.	ongoing
Dedicate a page on City of Langford’s website that promotes agricultural and food security initiatives, and provides information and links to other organizations.	medium
Partner with local organizations to build community gardens on city-owned parcels where and when appropriate through lease agreements.	medium
Work with local farms and community organizations to set annual targets for local food production.	low

**Goal 2. Protect the urban/agricultural land reserve boundary.**

C&F Land Resource Consultants recommend in their review that “*exclusion from the ALR should only be considered in the context of careful edge planning and buffering to protect the present and future agricultural use of the ALR lands. In particular, any significant increase in density on the block of small parcels east of Happy Valley Road lying north and south of Latoria Road will need very careful design to mitigate impacts of increase density.*” The consultant also recommends that higher density, multi-family developments be allowed to occur at the interface with agricultural lands. The form and character of this type of development is controlled through the Development Permit process.

Section 919.1(1) of the *Local Government Act* gives local governments with the authority to designate a “Development Permit (DP) Area” for the “protection of farming.” Designating land along the ALR boundary as a DP area is a way of protecting farm and non-farm uses and activities along the boundary where conflicts may arise. Langford’s OCP and Development Permit Guidelines would be amended to include a new Agricultural Development Permit Area and the specific objectives and policies that justify the designation. A permit must be obtained before a private land owner subdivides, alter land or construct or alter a building in a DP Area, and development must be in accordance with the terms of the permit.

Under the Land Title Act, the approving officer may refuse a plan or subdivision if adequate buffering on the urban side of the interface is not provided or proposed road alignments lead into the ALR and cause potential negative impacts on farming operations.

**Objective 1. Ensure development along the urban/agricultural land reserve boundary does not preclude long term viability of farmland.**

Action Steps	Priority
That Council establish an Agricultural Development Permit (DP) Area (also defined as the edge planning area) to ensure optimum land use and compatibility along both sides of the Urban/Agricultural Land Reserve Boundary. <b>100 m (328 ft)</b> measured from the fixed ALR boundary as of September 1 <sup>st</sup> , 2009 shall be designated the Agricultural DP Area.	high
That Council establish Agricultural Development Permit Area Design Guidelines and amend Bylaw 1201. Development Permit Guidelines.	high
That Council require the developer to provide an “Edge Planning Assessment and Buffer Plan” prepared by a registered Agrologist, Landscape Architect or Registered Professional Biologist at the time of applying for a Agricultural DP. The report shall address and provide recommendations with respect to: <ul style="list-style-type: none"> <li>❖ Appropriate screening, landscaping, fencing, location, spacing, size and quantity of proposed and existing trees and shrubs, and lists of tree and shrub species to be planted;</li> <li>❖ Setback of buildings from agricultural land;</li> <li>❖ Development and design elements that will promote compatibility (e.g. comment proposed road and lot layout, setbacks, locations of public and private open space, stormwater management, etc)</li> </ul>	high
That Council require the developer to provide a landscape security deposit in the amount of 100% of the estimated cost of the hard and soft landscaping and screening to be completed in the buffer area; and direct staff to amend the Landscape Policy to add this requirement.	high

**Objective 2. Increase public awareness among residents who live adjacent to agricultural land.**

Action Steps	Priority
That Council require the developer to register a nuisance easement on non-farm lands in favour of adjoining agriculture uses to inform residents and prospective purchasers of the neighbouring agricultural activities and possible activities associated with farm operations.	high/ongoing
That Council require as a condition of the Agricultural DP that the developer install agricultural awareness signage along the ALR boundary to inform residents and prospective purchasers of the proximity of farm operations and possible activities associated with farming.	high

**Objective 3. Mitigate conflict between new residential developments adjacent to ALR lands.**

Action Steps	Priority
That Council amend Bylaw 500. Subdivision and Development Servicing Bylaw, Bylaw 1201. Design Guidelines or create a new development standards policy to include the following guidelines for new <u>single-family</u> residential subdivisions adjacent to land in the ALR:	high

<ul style="list-style-type: none"> <li>❖ Design road access to direct traffic away from farming;</li> <li>❖ Have larger lot sizes along the interface with farming to provide for greater separation;</li> <li>❖ Provide screening and landscaping buffers to protect residents from agricultural activities and in accordance with the DP;</li> <li>❖ Greater building setbacks along the agricultural edge; and</li> <li>❖ Provide a drainage study prepared by a Professional Engineer to ensure runoff from the proposed subdivision is contained.</li> </ul>	
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**Goal 3. Provide a net-benefit to agriculture**

Stated in the agricultural suitability review prepared by C&F Land Resource Consultants is that *“historically, the (Agricultural Land) Commission has considered any exclusion of land from the ALR very seriously, and is reluctant to exclude land without a corresponding and significant net benefit to agriculture to offset the loss of ALR lands.”* Council has the opportunity to require a contributing benefit to agriculture at the time of rezoning, and already requires a contribution to the Agricultural Land Acquisition Fund.

In establishing the most appropriate actions to meet this goal, the following conclusions from the Agricultural Suitability Review were taken into consideration:

1. Issues of drainage and irrigation can be resolved to help improve agricultural capacity;
2. Certain agricultural lands within Langford are well suited to agricultural uses that are not currently being explored or envisioned, as the principal land use on these lands is rural residential. These lands could be put into productions for agriculture if the tenure were to change;
3. Net benefit to agriculture will likely be a prerequisite to any successful exclusion application; and
4. Consolidation of parcels within the ALR, infrastructure improvements and secure tenure for farmers would be viewed as positive steps by the ALR.

**Objective 1. Increase Agricultural Production in Langford.**

Action Steps	Priority
That Council establish a public trust (City of Langford) to secure donated agricultural land or purchased by the City from the cash contributions provided by developers towards the Agricultural Land Acquisition Fund.	high
Dedicate 40%, or an amount determined by Council, at the time of rezoning and that these lands will comprise the highest agricultural and environmental values on the property.	high
That Council secure tenure for farmers by moving agricultural lands from the private realm to the public trust, and then offering those agricultural lands for agricultural purposes on a leasehold basis.	high
That Council encourage the consolidation of titles by taking several small parcels of land within the ALR and consolidating them into one larger parcel. This would best be achieved at Dewdney Flats and along the north side of Latoria Road, east of Happy Valley Road.	ongoing
That Council request one or more of the following contributions from developers applying to exclude land from the ALR: <ul style="list-style-type: none"> <li>❖ Provide a contribution to drainage and irrigation as a net benefit to</li> </ul>	ongoing

<p>agriculture as well as including in the South Langford Drainage Study the need to provide drainage not only for future development, but also for future agriculture;</p> <ul style="list-style-type: none"> <li>❖ Carry out significant land improvements on land retained in the ALR such as importing organic materials or suitable clean soils, improving drainage and irrigation works, providing farm structures and/or equipment.</li> <li>❖ Request that the applicant provide a monetary contribution to a local farm or non-profit organization carrying out agricultural activities.</li> </ul>	
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**Objective 2. Ensure infrastructure investment on agricultural land secured in the public trust.**

<b>Action Steps</b>	<b>Priority</b>
Any agricultural land secured in the Public Trust has water supply and drainage.	high