

From: The undersigned concerned scientist and naturalists

To: Premier Christy Clark  
PO BOX 9041  
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VICTORIA, BC  
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Dear Premier Clark,

The British Columbia Government's recently proposed changes to the *Agriculture Land Commission* (the Commission) *Act* greatly concerns many scientists for three reasons.

First, the revised changes to the governance and decision-making structure of the Commission reduces the ability for science to inform land use decisions. Second, the shift to divide the decision-making process regarding land classification into southern and interior zones will increase pressure to remove land from the reserve at a cost to the general good. And finally, the rationale for the division of the province into two jurisdictions, based simply on the value of the crops, overlooks the importance of other values associated with agricultural lands such as habitat for wildlife, endangered species, and contributions to ecosystem services.

Agricultural lands that occur in all regions of the province hold many values other than simply crop production. These areas contain wetlands, streams, ponds, riparian areas, woodlands, hedgerows, and uncultivated grasslands that are either adjacent to or integral to farm operations. These areas are instrumental in protecting functioning healthy ecosystems and in many cases, these diverse services help boost agricultural production. Many of the ecosystems encompassed by the Agricultural Land Reserve are rare in British Columbia and they provide habitat for a number of the Province's most threatened or endangered species such as the burrowing owl, American badger, yellow-breasted chat, sage thrasher, Nooksack dace, and west slope cutthroat trout. Other more common species that occur on Agricultural Land Reserve land are integral to agricultural production. These species range from soil microbes that sequester carbon below pasturelands, to birds such as the western meadowlarks, swallows, and common nighthawks whose populations are already declining. Species prized for hunting such as deer and elk also use so called marginal agricultural lands. These species decline when agricultural lands are removed from production, marginal lands are converted to more intensive uses, or nonagricultural developments are permitted on agricultural lands. **Allowing more nonagricultural uses on ALR land and the release of more lands from reserves will have the unintended consequence of threatening many important ecosystems and, by extension, many valuable species including species-at-risk.**

Changing the current structure of the Commission to one that does not incorporate scientifically-derived information is deeply-flawed. Additionally, making changes to such an important piece of provincial legislation without consultation with the public, the agricultural industry, or scientists in general prevents relevant information and viewpoints to factor into informed decision-making. Allowing the agricultural industry to move forward with alternatives that incorporate science-based decision making within the current legislative framework are valid alternatives to altering the current reserve framework. These and other options should be explored because failing to incorporate alternate view points and scientifically derived information into the Commissions' decision-making framework threatens the health of British

Columbia's ecosystems and endangers its biodiversity. **The lack of a process to access and incorporate science-based information into the proposed framework threatens the biodiversity of British Columbia's ecosystems and the sustainability and security of agricultural production in a changing climate.**

We call upon the government of British Columbia to include scientifically derived information in the evaluation of the impacts of changes to Agricultural Land Reserve that may impact the health of British Columbia's ecosystems and species at risk.

Sincerely,

The undersigned concerned scientists and naturalists

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