



YORK REGION FEDERATION OF AGRICULTURE

SERVING THE FARM COMMUNITY SINCE 1940

December 6, 2022

City of Richmond Hill
225 East Beaver Creek Road
Richmond Hill, Ontario

Dear Mayor West and Council,

Re: Item 13.13 - Response to September 14, 2022 Member Motion – Regarding Stormwater Fairness

The York Region Federation of Agriculture (YRFA) is a non-profit general farm organization representing over 600 registered farm business members in York Region. We are farmers working for farmers on issues, legislation and regulations affecting farms in the Region as well as decisions that will affect agriculture into the future. We are passionate and dedicated to ensuring the agriculture sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

We are writing this letter to request that council amend the Stormwater By-Law to provide a 100% exemption for Stormwater Charges to all farmland properties that have a Farm Business Registration number.

Agriculture was not consulted in development of this charge. It is reasonable to assume that due to the very unique nature of agriculture, that a different approach for evaluating agricultures stormwater runoff mitigation and ecosystem water services. Stormwater only looks at one portion of the “water cycle”. The environment benefits that agricultural land has over impervious/paved surfaces such as residential, industrial and commercial uses provide ground water recharge, flood control, water filtration, water retention, and erosion control on farmland. These save costs to the City that are not recognized.

During the November 23, 2022 Special Council Education and Training Meeting on the Stormwater Management System and Stormwater Management Fee, an info graphic was used to show the effects of imperviousness on runoff and infiltration found in different property types. The Natural Ground Cover property with 0% impervious Surface showed 10% Runoff and 50% infiltration, and the Residential property showed higher runoff and lower infiltration. 10% runoff has been used throughout the Special Council Education Meeting and the December 7th Staff Report in association with the farmland property type. This number may in many cases be lower than 10%. As stated above, agricultural land producing crops provide the same types of ecosystem water services as natural areas. Most farms also implement agriculture Best Management Practices (BMP) implemented by farmers improve soil health and water holding capabilities which in turn reduce runoff and therefore also benefit the City. BMP's can be to implement. I would suggest that given the very low amount of runoff into the City stormwater management system from farms and the high cost the farmer is already paying when implementing the BMP's, Council should be exempting farms from the Stormwater Management Fee instead of trying to find an appropriate amount to charge farmers.

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Ability to pay should be a factor given significant consideration when deciding on a fee structure. During his September 14, 2022 deputation to Council, Mr. Doner did an excellent job of outlining the high cost of farming today. The ten acre cap on the farmland fee rate while significantly lower than the rate approved in April 2022, is still cost prohibitive. Most farmers are not able to pass on any type of expense increase to the buyers of their crops or livestock. The commodity price for many crops is set by the Chicago Board of Trade or at auction for livestock. Since most farmers do not have the ability to pass on this fee in the same way that industrial, or commercial properties can, they have to take it as a loss to their bottom line.

Page 3 of the December 7, 2022 Staff Report states that “Increases in the amount of hard surfaces from human activities can dramatically disrupt the natural water balance of a site by increasing the amount of rainwater that turns into overland runoff instead of it infiltrating into the ground.” However, in an agricultural context, farm properties have larger amounts of natural areas adjacent to, and surrounding the impervious areas on the property, and these areas serve as infiltration areas and reduce the amount of stormwater runoff from these properties before the runoff water can get to the roadside ditch or stream. Therefore, in the case of agricultural properties, impervious area does not directly correlate with the amount of stormwater runoff from a property.

The Phase One proposal on page 16 of the December 7, 2022 Staff Report raises concern and questions. The cap at ten acres still will result in an unmanageably high Stormwater charge to the farmer, that doesn't seem to have a scientific basis to back up the method used to derive the calculation. We request an explanation of the calculation and the reasoning for selecting 10 acres, instead of 5 acres or two acres.

Thank you for the opportunity to provide comments Regarding Stormwater Fairness. We look forward to working with you on this and other farm related issues in the future.

Sincerely

Kim Empringham
Secretary/Treasurer/Director
York Region Federation of Agriculture