



# YORK REGION

## FEDERATION OF AGRICULTURE

SERVING THE FARM COMMUNITY SINCE 1940

November 15, 2023

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

Dear Chair DiPaola and Committee

Re: Item 11.8 - Regarding Stormwater Rate Structure Review

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 the agriculture sector in the Region.

York Region Federation of Agriculture is requesting a further reduction of the proposed \$2.02 per 1,000 square feet Agricultural Land Stormwater rate as it should be lower than the vacant land rate.

There are three factors that don't appear to have been considered or included as factors used in the revised agricultural land impervious factor and fee calculation.

Factor #1. Most urban property types have been engineered to slope towards the stormwater drains directing 100% of the runoff into the stormwater system while agricultural land has not been engineered to slope to the waste water system. In fact, there are many agricultural properties with a natural slope that does not drain off the property at all.

Factor #2. Vacant land and agricultural land should not have the same Impervious Factor. All agricultural land, even agricultural land that is minimally tilled has a much higher ability to absorb rain water than vacant untilled land.

Factor #3. As noted in 3.1.9 of the Watson & Associates Consultant report, Agricultural soils are often improved with tile drainage. These three-foot-deep pipes are installed throughout the agricultural fields. Tile drains increase soil rainwater absorption and slowly filter the water through the soil to then enter the tile drain and then eventually empty a smaller percentage of the rainwater absorbed into the adjacent road side ditch or river. Farm tile drains are storm water management infrastructures that have already been paid for by the farmer that benefit both the farm and the City. Tile drains increase rainwater absorption; prevent soil erosion into the City's stormwater infrastructure; filter the water that is absorbed; and divert water from the roadside ditches and rivers until after the peak rain events have passed and the City's system is able to accommodate the filtered water in the system.

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For these three reasons the York Region Federation of Agriculture believes there should be a further reduction in the proposed Agricultural Land Stormwater Rate of \$2.02 per 1,000 square feet to below that of vacant land.

Thank you for the opportunity to provide comments regarding the Stormwater Rate Structure Review. We look forward to working with you on this and other agriculture related issues in the future.

Sincerely

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York Region Federation of Agriculture  
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