



February 2, 2022

File: 0280-30

Local Government File: A 21-08

Holden Blue, Planner II

City of West Kelowna

Via Email: [Holden.Blue@westkelownacity.ca](mailto:Holden.Blue@westkelownacity.ca)

Dear Holden Blue:

**Re: Development Application Review for 3716 Carrall Road (PID 011-812-311).**

Thank you for providing the Ministry of Agriculture, Food and Fisheries (ministry) staff with the opportunity to comment on the subdivision application to divide the 25.4 acre Subject Parcel in the Agricultural Land Reserve (ALR) at 3716 Carrall Road into two separate parcels (10.6 acres and 14.8 acres). From an agricultural perspective, we offer the following comments:

- The application does not provide a plan or a rationale for how agriculture will be enhanced by the subdivision. Current vineyard production is approximately 3 acres, and no plan has been presented for expansion.
- We note that there is a covenant on title restricting the secondary residence to farm workers or a caretaker. If the subdivision proceeds as presented, we recommend that this secondary residence be removed or decommissioned until there is a viable agricultural operation on the property that would require additional farm labour to live on site.
- Provincial Agricultural Land Use Inventory (ALUI) data consistently show that smaller parcels are less likely to be farmed than larger parcels.
- Soil classification and suitable topography of the Subject Parcel are well suited to support a multitude of agriculture crops and if chosen to be put into production could produce a viable operation on 25 acres. Economies of scale may be harder to realize on smaller parcels and will require more intensive production to be viable.

- Based on the application materials provided, the proposed subdivision does not appear to support farming and could be detrimental insofar as it will split the agriculture worker and principal residence from the vineyard and winery. The configuration of the subdivision is likely to trigger an application in the future for a house on the vineyard parcel which will further limit productive area of this proposed parcel.

Please contact Ministry staff if you have any questions regarding the above comments.

Sincerely,



Alison Fox, P.Ag.  
Land Use Agrologist  
BC Ministry of Agriculture, Food  
and Fisheries  
Alison.Fox@gov.bc.ca  
(778) 666-0566



Philip Gyug, P.Ag.  
Regional Agrologist  
BC Ministry of Agriculture, Food  
and Fisheries  
Philip.Gyug@gov.bc.ca  
(250) 378-0573

Email copy: Michael McBurnie, ALC Regional Planner, Michael.McBurnie@gov.bc.ca