

EEPAC Working Group Comments on Draft Urban Agriculture Strategy

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The document was well-written and thorough. However, some concerns have been identified, and need to be clearly addressed.

Concerns are summarized into five main points:

Pesticides

Foremost, it should be encouraged that the projects be as organic and environmentally sensitive as possible (i.e. no use of chemical fertilizers or pesticides). On city property it would be assumed that pesticides are off limits as the city pushed to ban lawn spraying, etc. However, those requirements should be clearly outlined.

As mentioned in the document (Page 12), the soil tests will be key. Growing food in traditionally urban soils may increase the risk of exposure to industrial pollutants and pesticides/herbicides that may be banned from traditional agriculture.

If using compost on land growing food for consumers, the pesticide load of the compost and its influence on pesticides in the soils it is used on needs to be considered.

Native plant species:

It should be highly encouraged to promote edible native species. This could have several positive outcomes including helping pollinators and preserving knowledge of indigenous plant species that have perhaps been forgotten.

Urban livestock:

Due to the risk of animal-to-human disease transmission, urban livestock rearing should have a health and safety regulatory framework in place BEFORE it is permitted (page 13).

Due to the presence of chicken feed, rats regularly become a problem around chicken coups. Perhaps the city should look into how it would deal with that particular problem as an explosion of rats within the city would not be good.

ESAs

Urban agriculture projects should be separated from ESAs. The minimum distance from ESAs, according to the city regulations, should be taken into account. Potential problems that would arise due to proximity of urban agriculture projects to ESAs include potential invasion of non-native, invasive plant species, and also potential pollution from runoffs with traditional fertilizers and manure. Therefore, the final plan with city regulations may have to be more clear, such that private land owners next to an ESA can't raise any form of livestock or cannot plant certain non-native and invasive species within a certain distance of an ESA.

Human health

There is only minimal consideration for human health impacts from mismanagement of urban agriculture (e.g. soil pollutants, animal-to-human disease transmission, pesticides in composting materials). There really should be more consideration of these impacts in the document.