

### OMAFA Guidelines for the AIA Component One Requirement

A supplement to the Agricultural Impact Assessment (AIA) Guidance Document to support the pre-bid stage of the Second Long-Term (LT2) Procurement

May 21, 2025

To request this document in an alternate format, please contact omafra-quidelines@ontario.ca.

The following is intended for informational purposes only. In accordance with the RFPs issued for LT2, municipalities or planning boards must be satisfied that the proponent has adequately demonstrated completion of the AIA Component One Requirement. Subject to municipal discretion, elements of this process may be scoped to be proportional to the type, complexity, and scale of a proposed project, as well as the anticipated degree or magnitude of impacts from the project.

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### Overview

Prime agricultural areas contain Ontario's most productive farmland. Healthy and productive farmland is the foundation for agriculture and is essential to grow the crops and raise the livestock that maintain the province's supply of food, fuel, and fibre. To keep our agri-food sector and supply chain strong, we must balance the needs for community development with the protection of farmland. Planning authorities are encouraged to support local food and foster a robust agri-food network to realize the economic, environmental, and social benefits potential that farmland provides.

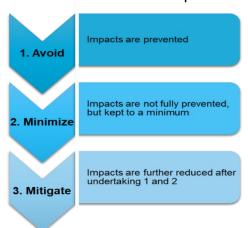
Accordingly, non-agricultural uses such as energy projects are generally only permitted in prime agricultural areas when impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated, as demonstrated through an Agricultural Impact Assessment (AIA).

AlAs help decision-makers understand what may be impacted by a proposed development. In turn, they can:

- build public support for projects,
- minimize agricultural land taken out of production; and,
- promote compatibility between agricultural and non-agricultural uses.

By contributing to proposals which are designed in a manner that considers agricultural impacts, AIAs help support the long-term viability of the agri-food sector.

There are three main components of an Agricultural Impact Assessment:



This document serves as guidance for the completion of the AIA Component One Requirement when required for the LT2 Request for Proposals (RFPs). For projects selected for a contract, suppliers must also complete the AIA Components Two and Three Requirement to the satisfaction of the Local Municipality<sup>1</sup>. This requirement addresses the second (minimize) and third (mitigate) components of an AIA. Taken together, all three

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<sup>&</sup>lt;sup>1</sup> For the purposes of this guidance document, the term 'municipalities' and the singular term 'municipality' are used in a generic manner to indicate any governing body with decision making authority that affects a planning matter, such as upper-tier, lower-tier and single-tier municipalities, as well as planning boards. The term "Local Municipality", where applicable, is a term used in the LT2 RFP which is as defined in the Municipal Act, 2001, SO 2001, c 25 or the City of Toronto Act, 2006, SO 2006, c 11, Sched A, both as amended from time to time.

components comprise a comprehensive AIA to address potential impacts from energy projects in prime agricultural areas.

A checklist for completing the AIA Component One Requirement is included in Appendix A.

### AIA Component One Requirement for agriculturally-integrated projects

Where a proponent has demonstrated that a location within a prime agricultural area or on land with higher priority soils is necessary and subject to municipal discretion, the evidence to support the AIA Component One Requirement for agriculturally-integrated projects may exclude the evaluation of alternative locations and instead focus on demonstrating that the project must be located within a prime agricultural area or on higher priority land. For example, if a proponent demonstrates that an agriculturally-integrated project must be located within a prime agricultural area or on higher priority land because it is inherently integrated with agricultural operations in that area, then a municipality may deem this as sufficient information to satisfy the AIA Component One Requirement. This does not preclude future impact analysis if a project is selected for a contract and a comprehensive AIA is required. Details regarding work that may be required to minimize and mitigate impacts of a project will be provided in a forthcoming guidance document for the AIA Components Two and Three Requirement under LT2. Additional elements that may be streamlined for agriculturally-integrated projects will also be noted in this related document.

The following outlines projects which may be considered agricultural-integrated; however, individual project specifics will influence the detail and type of information required to satisfy the host municipality. In addition, criteria developed by a municipality, for example through local planning documents, should also be considered.

#### Criteria

All agriculturally-integrated projects:

- must be compatible with, and shall not hinder, surrounding agricultural operations (see Publication 851: Guidelines on Permitted Uses in Prime Agricultural Areas for more information on compatibility);
- support continued agricultural production by minimizing the amount of land taken out of agricultural production; and,
- rely on a defined interdependency with agriculture.

Such projects often include decommissioning plans committing to rehabilitate project areas back to pre-development agricultural conditions.

### Location

Agriculturally-integrated projects are either:

located on the same parcel as an active farm operation and are secondary to the
principal agricultural use of that property, based on a limited amount of lot coverage
area (see Publication 851: Guidelines on Permitted Uses in Prime Agricultural
Areas for more information on identifying projects that are secondary to the
principal agricultural use of the property and limited in area); or,

- are not located on the same parcel as an active farm operation, but are necessarily integrated into agricultural operations in the area by, for example biogas projects that:
  - o manage agricultural source materials, such as manure; or,
  - o utilize agricultural feedstocks, such as crop residue.

### Need

If exempt from the evaluation of alternative locations, agriculturally-integrated project proponents must demonstrate a need to co-locate with a farm operation and/or locate in a prime agricultural area. The need should be linked to an operational relationship between the energy project and agricultural uses that extends beyond financial compensation. For example, agriculturally-integrated projects including, biogas, biomass or combined heat and power facilities may demonstrate a mutually-beneficial or integrated relationship with agriculture by:

- utilizing agricultural source material (e.g., input/feedstock dependency); and/or,
- generating byproducts such as soil amendments, heat or CO2 that are primarily utilized by surrounding farm operations (e.g., output dependency).

Additionally, while ownership of a proposed site alone is not a substitute for an of evaluation alternative locations, the need for a specific location may be demonstrated where the project proponent is the farm owner seeking to site the project on their farm due to an operational relationship.

Other projects such as wind facilities and battery energy storage systems are generally not considered agriculturally-integrated projects because they do not have an integrated relationship with agriculture that depends on the utilization of agriculture-related inputs and/or the generation of agriculture-related outputs. The following section covers the process for completing the AIA Component One Requirement for those types of projects.

### **AIA Component One Requirement for other projects**

There are two parts for completing the AIA Component One Requirement outlined in the RFPs for the energy and capacity streams under LT2 for projects that are not agriculturally-integrated, but are proposed to be located within a prime agricultural area.

<u>Part A:</u> an evaluation of alternative locations within the Local Municipality, outside prime agricultural areas;

and where avoiding prime agricultural areas is not possible,

<u>Part B:</u> consideration of alternative locations within a prime agricultural area on lands with lower priority soils (based on Canada Land Inventory mapping).

The following outlines the steps taken for each part in more detail.

# Part A: Evaluating alternative locations within the Local Municipality, outside prime agricultural areas

- Evaluating whether there are any suitable alternative locations outside prime agricultural
  areas is an important early step in site selection, because if a feasible location can be
  found outside of a prime agricultural area, then an AIA is not required.
- Information provided in the AIA Component One Requirement must be prepared to the
  satisfaction of the Local Municipality. As such, it is important to work closely with municipal
  staff (e.g., planning department or clerk) to confirm land use designations, ask questions
  about local policy or arrange for a meeting to discuss the proposed project. A list of
  municipalities in Ontario, including their status as an upper-tier, lower-tier or single-tier
  municipality, is available <a href="here">here</a>. In addition, a list of planning boards is available <a href="here">here</a>.
- Project proponents may wish to retain the services of a land use planning consultant or
  professional agrologist to prepare reports, provide representation, help interpret local
  planning documents and navigate any land use planning applications that may be required
  (e.g., site plan). The <u>OPPI Consultant Directory</u> lists professional planning consulting firms
  in Ontario and the members of the Ontario Institute of Agrologists are found <u>here</u>.

<u>Part A, Step 1:</u> Contact the relevant municipalities to explore if the project can avoid prime agricultural areas

 Engagement between the proponent and municipality, before selecting a site, is critical to demonstrate consideration of alternative locations.

- OMAFA does not provide mapping of prime agricultural areas.
   Municipalities map these areas on land use schedules contained in their official plan. Therefore, the primary source of information for this step is applicable upper and lower-tier or single-tier municipal official plan(s).
- Proponents should work with municipalities that may host a
  project to understand the local land use designations so that
  any prime agricultural areas can be identified. For example,
  municipality official plans may contain other land use
  designations such as rural lands, settlement areas, industrial,
  commercial, institutional, recreation or open space, as well as
  Crown lands.
- Screening official plan maps and policies helps to understand
  the range and types of land use designations that may exist for
  possible siting alternatives. It is important for proponents to
  refer to both official plan mapping (e.g., schedules in an official
  plan) and corresponding official plan policies, and when in
  doubt, to contact the municipality to request a copy of the
  relevant planning documents or to ask for assistance in
  determining if a site is part of a prime agricultural area or not.
- If the project is proposed to be located outside a prime agricultural area, the AIA Component One Requirement does not need to be included in the Municipal Support Confirmation.

<u>Part A, Step 2:</u> Evaluate alternative locations within the Local Municipality (note: for more information, see Agricultural Considerations for Siting Non-Agricultural Uses in <u>Appendix E</u>)

- Proponents should investigate and evaluate possible alternative sites which are designated something other than a prime agricultural area.
- The size of the geographic area within which to explore alternative locations will vary according to the nature of each individual project.
- Depending on the scale and location of specific desirable features (e.g., fuel source, connection point), other lands in adjacent municipalities may also be considered.
  - o For example, it should be indicated in the evaluation of a project if a project relies on a specific connection point for feasibility. Alternative sites should be identified and then evaluated for project suitability within a technically and fiscally viable distance from the identified connection point. Each individual project is unique and thus will require establishing a defensible maximum viable distance from given features or elements for this purpose.
  - Similarly, a proponent may be seeking to expand an existing facility by relying on shared infrastructure, such as site entrances, internal roadways, a connection point and/or transformer equipment. Or a proponent may be seeking to pair with an existing facility to create a hybrid project (e.g., both capacity and energy). In those

### Nomenclature...

- Prime agricultural areas are a type of land use designation established in an official plan describing a defined area of land within which a specific set of policies apply (see definition in Appendix D: Key Terms).
- Not all municipalities label their local designation as "prime agricultural area".
- While the policy intent or outcome may be the same, sometimes other similar labels or terms are used to describe the prime agricultural area (e.g., "agriculture area", "agricultural land base", "agricultural protection area", etc.).
- For this reason, it is important to read official plan policies along with reviewing maps of designations.

circumstances, the existing facility should be identified and a defensible viable maximum distance from that element should be established.

 Proponents should identify at least one other alternative location within the Local Municipality to evaluate; however, municipalities may expect multiple alternatives to be explored before a location in a prime agricultural area is favoured.

### Part A, Step 3: Demonstrating a lack of suitability

- If, after a review, it is determined that no suitable alternative locations exist outside prime agricultural areas then project proponents must provide reasons why the alternative locations evaluated were deemed unsuitable or unviable for their specific project needs. For example, possible reasons may include:
  - Connection constraints limiting proximity to the local distribution network
    - To demonstrate the consideration of alternative locations within a viable connection distance from the distribution network, it is important to illustrate, using a map (see examples in <a href="Appendix B">Appendix B</a> and <a href="Appendix C">Appendix C</a>), where the proposed connection point is in relation to the municipal prime agricultural area designation, as well as the underlying Canada Land Inventory soil mapping.
  - Constraints related to the availability of the resource being targeted (e.g., wind) for the project.
  - Other environmental or technical constraints (e.g., presence of wetlands, hazard lands, pipeline or transmission features, noise receptors, size of parcels being assembled).
  - Direction provided by a municipality for a preferred location based on the needs of the local community.
  - The relationship of a preferred location to an Indigenous Community, where applicable.
  - The relationship of a preferred location to an existing asset which will be used in conjunction with the project.
  - Whether the subject lands represent a logical extension of an existing facility, which may allow for the common use of shared features (such as site entrance, connection points, internal roadways, staging areas, continuous berms).
- It is recognized that project siting is driven by many factors, such as fuel availability; transmission, distribution or connection feasibility, cost to develop; etc.
- It is also anticipated that the process for evaluating alternatives will look slightly different
  for contained or contiguous projects (e.g., battery storages, biogas) versus distributed
  projects (e.g., wind turbines). See <a href="Appendix B">Appendix B</a> and <a href="Appendix C">Appendix C</a> for illustrative examples of
  each type of project.

# Part B: Evaluating alternative locations within prime agricultural areas (i.e., on lands with lower priority soils, based on Canada Land Inventory mapping)

If it is determined there are no suitable alternatives that avoid prime agricultural areas, then the proposed project site will be in a prime agricultural area.

Accordingly, the next step in the process is to review the Canada Land Inventory soil capability mapping to evaluate alternative locations which may be comprised of land with lower priority soils.

### Part B, Step 1: Review Canada Land Inventory mapping

- Ontario's digital soil mapping is available online in <u>AgMaps</u> and <u>Ontario GeoHub</u>. Proponents and municipalities can access this mapping to evaluate possible alternative locations where more marginal land may exist.
- Proponents must demonstrate having reviewed the Canada Land Inventory mapping and evaluated reasonable alternative locations for project siting to the satisfaction of the municipality.

### Lower priority soils...

- Sometimes also referred to as 'lower quality' or 'lower capability' soils, these relative terms indicate the presence of more marginal soils which are generally less productive for growing agricultural crops than higher priority soils.
- For example, Class 4-7 soils receive a lower priority for protection compared to Class 1-3 soils.
- The priority for protection is established in the definition of 'prime agricultural lands', contained in the Provincial Planning Statement, 2024 (see Appendix D: Key Terms).

### Part B, Step 2: Evaluate alternative locations

- Unless the preferred site is already comprised of lower quality soils, proponents should investigate and evaluate possible alternative sites which, although may be located in a prime agricultural area, are on land comprised of lower priority soils.
- Recognizing that a project site may be comprised of multiple soil polygons, lower priority soils should constitute part, or all, of the alternative locations evaluated.
- Proponents are encouraged to consider both dominant soil class ratings and any subclass ratings that may exist (see soil resources listed in <u>Appendix E</u> for more details).
- Proponents should identify at least one other alternative location to evaluate; however, municipalities may expect multiple alternatives to be explored before a location comprised of land with higher priority soils is favoured.

### Part B, Step 3: Demonstrating a lack of suitability

- As specified in the LT2 RFPs, proponents must describe the evaluation of alternative locations undertaken and demonstrate that there were no suitable or viable sites for proponent's project outside of prime agricultural areas (see examples in <u>Appendix B</u> and <u>Appendix C</u>).
- Justification for the chosen site should include the reasons for it being preferred over other
  alternatives evaluated, including how it relates to agricultural resources in the area (e.g., is
  the chosen site comprised of land with lower priority soils compared to the other potential
  sites considered?).

In addition to the CLI ratings, depending on local circumstances, adaptive reuse of
previously disturbed sites, those which cannot be rehabilitated to an agricultural use, or
those with existing non-agricultural uses may be considered lower priority agricultural
areas for the purpose of identifying alternative locations in Part B. In addition, sites with
existing commercial or industrial zoning could be considered favourable by the host
municipality.

### **Summary and Next Steps**

It is important for proponents to engage with municipalities early to explore possible candidate sites in order satisfy the AIA Component One Requirement. There are two parts that must be completed:

- Part A: evaluation of alternative locations within the Local Municipality, outside prime agricultural areas; and,
- Part B: consideration of alternative locations within a prime agricultural area (i.e., on lands with lower priority soils, based on Canada Land Inventory mapping).

An evaluation with supporting documentation for each part informs the host municipality on how the preferred site was chosen and it demonstrates that the proponent considered ways to avoid potential impacts from their proposal.

If satisfied with the information provided, the Local Municipality will indicate this as part of their Municipal Support Confirmation as outlined in the Prescribed Form: Evidence of Municipal Support.

If an evaluated project is selected for a contract by the Independent Electricity System Operator (IESO), it is expected that findings from the AIA Component One Requirement be incorporated in the comprehensive AIA submitted at a later stage to address how a project considered ways to avoid impacts. Details regarding work that may be required to minimize and mitigate impacts of a project will be provided in a forthcoming guidance document for the AIA Components Two and Three Requirement under LT2.

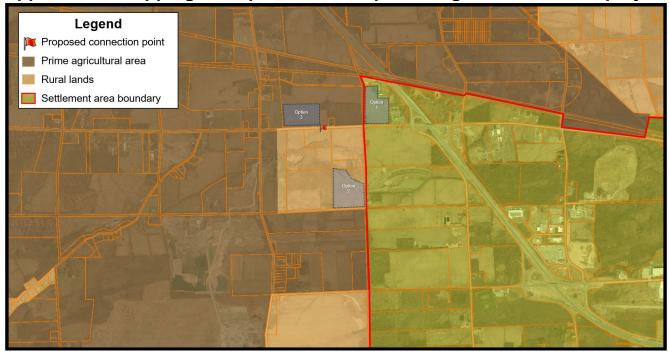
AIA Component One Requirement is a procurement requirement, separate from other land use planning processes that may also apply. However, information from the AIA Component One Requirement may also be useful to incorporate any land use planning approvals that may be required. For example, referencing this information in any planning justification report that may be submitted to demonstrate consistency with policies contained in the Provincial Planning Statement, 2024. Early engagement with municipalities is important to understand all local expectations.

Municipalities are encouraged to develop a Terms of Reference (TOR) to establish consistent local expectations for the approach and scope of an AIA. Adopting a TOR makes it clear what information will be included to satisfy the host municipality, which helps avoid potential delays from unnecessary revisions of material prior to being accepted. The use of a TOR may also provide opportunities for the scope of the AIA to align with other local requirements (e.g., those under the *Planning Act*).

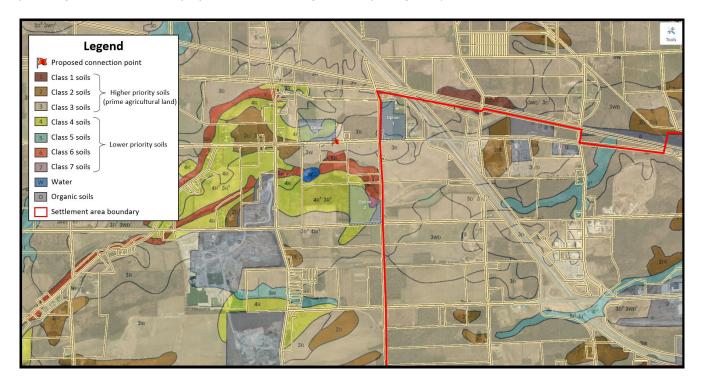
## Appendix A: Checklist for the AIA Component One Requirement

Agriculturally-integrated projects		
Required documentation		Requirement met
The Proponent has provided a description of the project to demonstrate it will meet the criteria for agriculturally-integrated projects		□ Yes
		□ No
		□ N/A
are no	: if no or N/A is selected, the process below for projects that tagriculturally-integrated applies)	
The Proponent has demonstrated a need to locate the project in the		□ Yes
prime agricultural area		□ No
The Proponent has demonstrated a need to locate the project on land comprised of higher priority soils		□ Yes
		□ No
		□ N/A
Proje	cts that are not agriculturally-integrated	
	Required documentation	Requirement met
Part A	The Proponent has provided a description of how potential	□ Yes
	alternative locations within the Local Municipality, outside the prime agricultural area were evaluated.	□ No
	The Proponent has provided a description of the reasons why	□ Yes
	such alternative locations were determined to be unsuitable or unviable.	□ No
Part B	The Proponent has provided a description of how potential	□ Yes
	alternative locations within the Local Municipality, on land	□ No
	comprised of lower priority soil were evaluated.	□ N/A
	The Proponent has provided a description of the reasons why	□ Yes
	such alternative locations were determined to be unsuitable	□ No
	or unviable.	□ N/A
Sumr	nary	
Therefore, the Proponent has completed the AIA Component One		□ Yes
Requirement to the satisfaction of the Local Municipality.		□ No

Appendix B: Mapping examples for a sample contiguous/contained project

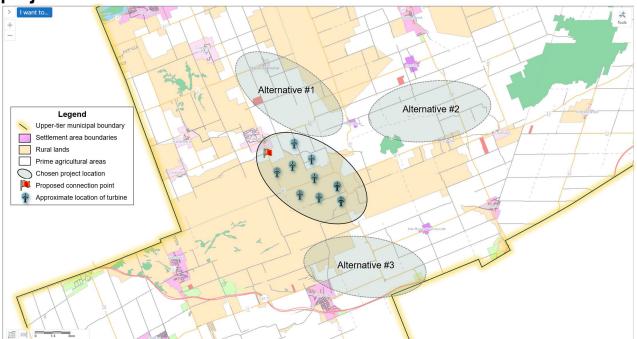


Illustrative example for demonstrating the spatial evaluation of alternative locations outside prime agriculture areas for a hypothetical contiguous/contained project, such as a battery energy storage system. This type of map could be used to support Part A of the AIA Component One Requirement (i.e., options outside prime agricultural areas for projects that are not agriculturally-integrated).

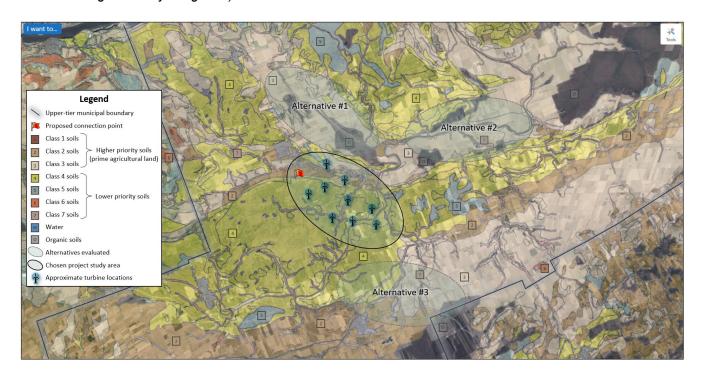


Illustrative example for demonstrating the spatial evaluation of alternative locations within a prime agricultural area for a sample contiguous/contained project, such as a battery energy storage system. This type of map could be used to support Part B of AIA Component One Requirement (i.e., options within a prime agricultural area for projects that are not agriculturally-integrated, but on land with lower priority soils, based on Canada Land Inventory mapping).

# Appendix C: Mapping examples for a sample non-contiguous/distributed project



Illustrative example for demonstrating the spatial evaluation of alternative locations outside prime agriculture areas for a sample non-contiguous/distributed project, such as wind turbines. This type of map could be used to support Part A of the AIA Component One Requirement (i.e., options outside prime agricultural areas for projects that are not agriculturally-integrated).



Illustrative example for demonstrating the spatial evaluation of alternative locations within prime agricultural areas for a sample non-contiguous/distributed project, such as wind turbines. This type of map could be used to support Part B of the AIA Component One Requirement (i.e., options within a prime agricultural area for projects that are not agriculturally-integrated, but on land with lower priority soils, based on Canada Land Inventory mapping).

### **Appendix D: Key Terms**

Prime agricultural areas: means areas where prime agricultural lands predominate. This includes areas of prime agricultural lands and associated Canada Land Inventory Class 4 through 7 lands, and additional areas with a local concentration of farms which exhibit characteristics of ongoing agriculture. Prime agricultural areas may be identified by a planning authority based on provincial guidance or informed by mapping obtained from the Ontario Ministry of Agriculture, Food and Agribusiness and the Ontario Ministry of Rural Affairs or any successor to those ministries.

(Provincial Planning Statement, 2024)

- Prime agricultural land: means specialty crop areas and/or Canada Land Inventory Class 1, 2, and 3 lands, as amended from time to time, in this order of priority for protection. (Provincial Planning Statement, 2024)
- System used for classifying soil based on its capability for growing common field crops. The lower the capability rating of the soil, the lower its priority for protection relative to soil in higher capability classes.



- Specialty crop area: means areas within the agricultural land base designated based on provincial guidance. In these areas, specialty crops are predominantly grown such as tender fruits (peaches, cherries, plums), grapes, other fruit crops, vegetable crops, greenhouse crops, and crops from agriculturally developed organic soil, usually resulting from:
  - soils that have suitability to produce specialty crops, or lands that are subject to special climatic conditions, or a combination of both;
  - o farmers skilled in the production of specialty crops; and
  - a long-term investment of capital in areas such as crops, drainage, infrastructure and related facilities and services to produce, store, or process specialty crops.

(Provincial Planning Statement, 2024)

• <u>Rural lands:</u> means lands which are located outside settlement areas and which are outside prime agricultural areas.

(Provincial Planning Statement, 2024)

 AIA Component One Requirement: means a written notice by way of e-mail delivered by the Proponent to the chief administrative officer or equivalent of an applicable Local Municipality which:

- (A) acknowledges that the Project Site in respect of a proposed Long-Term Energy Project (other than a Non-Rooftop Solar Project) includes any lands located in areas designated as Prime Agricultural Area as of the delivery of the Pre-Engagement Confirmation Notice; and
- (B) includes documentation that the Proponent has evaluated alternative locations for its proposed Project Site, as informed by OMAFA Guidelines.

(May 15, 2025, draft LT2 RFP)

• <u>Local Municipality:</u> means any corporation that is a "local municipality" as defined in and for the purposes of the *Municipal Act, 2001*, SO 2001, c 25 or the *City of Toronto Act, 2006*, SO 2006, c 11, Sched A, both as amended from time to time.

(May 15, 2025, draft LT2 RFP)

### Appendix E: Resources

The following may be consulted for more information, or mapping tools:

- IESO's <u>Agricultural Impact Assessment Questions and Answers</u>, Version 2 (November 26, 2024)
- <u>AgMaps</u> (for Canada Land Inventory soil mapping, municipal and private tile drainage system, Agriculture and Agrifood Canada's agricultural use data, etc.)
- Ontario.ca webpage (for draft guidelines on broader Agricultural Impact Assessments)
- <u>Agricultural Considerations for Siting Non-Agricultural Uses story map</u> (for information about evaluating alternative locations)
- Ontario.ca webpage (for Publication 851: Guidelines on Permitted Uses in Prime Agricultural Areas)
- Agricultural Systems Portal (for plotting elements of the agri-food network)
- <u>ConnectON</u> (for identifying elements of the agri-food network)
- <u>Provincial Planning Statement, 2024</u> (for definitions of key terms and land use planning policies)

Visit these websites to learn more about Ontario's soils:

- <u>Use of soil and Canada Land Inventory information for agricultural land use planning in Ontario</u>
- Soil capability for agriculture in Ontario
- Guidelines for detailed soil surveys in Ontario