



CITY OF RICHMOND
URBAN DEVELOPMENT DIVISION

REPORT TO COMMITTEE

TO: Planning Committee
FROM: Joe Erceg
Manager, Development Applications

To Planning - Sept. 19, 2000
DATE: September 6, 2000

FILE: AG 00-176704

**RE: Agricultural Land Reserve Appeal Application by Sungold Entertainment Corp.
for a Horse Racetrack at 6220 and 6131 No. 8 Road**

STAFF RECOMMENDATION

That authorization for Sungold Entertainment Corp. to apply to the Land Reserve Commission for a horse racetrack at 6220 and 6131 No. 8 Road be denied.

Joe Erceg
Manager, Development Applications

HB:blg
Att. 1

FOR ORIGINATING DIVISION USE ONLY
CONCURRENCE OF GENERAL MANAGER

STAFF REPORT**ORIGIN**

Sungold Entertainment Corp. has applied for permission to locate a horse racetrack in the Agricultural Land Reserve (ALR) at 6220 and 6131 No. 8 Road (see attached location map).

Copies of the Sungold submissions (Part 1: Schedule 1 Application and Executive Summary and Part 2: Appendices) have been previously distributed to the Mayor and Council by the applicant and are available in the City Clerk's Department.

Recent letters of support and in opposition to the proposed horse racetrack since the aforesaid submission are also available in the Urban Development Division.

FINDINGS OF FACT

ITEM	EXISTING	PROPOSED
Owner	A.C. Gilmore & Sons (Farms) Ltd.	Sungold Entertainment Corp.
Applicant	Sungold Entertainment Corp.	No Change.
Site Size	39.3 ha and 52.7 ha (97 ac. and 130 ac.) Total = 92 ha (227 ac.).	92 ha (227 ac.) plus approx. 1.6 ha (4 ac.) if No. 8 Road is closed and included in consolidated lot.
Land Uses	Farming (potato row crops, mixed vegetables, grain, hay and pasture), residence, barn, potato pit, outbuildings, treed area.	Horse racetrack (3 tracks), grandstand, turf club, simulcast room, restaurants, conference centre, band shell, stable areas, equine therapy centre, riding school, sales pavilion, administration building, tack and feed store, sports medicine building, pool and recreational facilities, animal hospital, maintenance building, horse museum, walking ring, automobile parking, nature park.
OCP Designation	Agriculture. 7.1 ha (17.5 ac) ESA designation in south-west corner and southern boundary of 6131 No. 8 Road.	To be determined. Environmentally Sensitive Area (ESA) to be retained as nature park.
Zoning	Agricultural District (AG1).	To be determined.
Soil Classification (Canada Land Inventory)	Predominantly Class 2, 3 and 4 lands with wetness limitations and organic soils.	To be determined.
Heritage	Wilson/Gilmore barn, Gilmore farm house and significant tree on 6220 No. 8 Road.	To be retained or relocated on-site if possible.

RELATED POLICIES & STUDIES

Section 22 of Agriculture Land Reserve Procedure Regulation 452/98 deals with special case use applications within the ALR. Included within the list of special case uses are "horse riding arenas or boarding stables". These types of applications can be made directly to the Land Reserve Commission, who only refer the special case use proposal to the City for comment (not approval).

The Land Reserve Commission also has a policy (#020/85) dealing with equestrian facilities for personal use vs. commercial use. This policy states "if a property owner wishes to use an arena, riding ring, or facility to house, show, exercise, train, or board animals other than the property owners', a special case application to the Commission is required".

STAFF COMMENTS

File Manager

Although the applicant has attempted to submit this application as a special case use, City staff (in consultation with the Land Reserve Commission staff) have taken the position that the proposed horse racetrack and associated uses constitute a non-farm use in the ALR. Thus, the City's authorization is required before the subject ALR application can be considered by the Land Reserve Commission.

Furthermore, it is staff's position that the subject properties would have to be rezoned and the Official Community Plan (OCP) designation changed if this ALR application was supported by Council and/or approved by the Land Reserve Commission.

Land Use

Land Use staff have reviewed this application based on their involvement with the Council authorized Richmond Agricultural Viability Strategy (RAVS) which is scheduled for completion in the Spring 2000. The following analysis examines the potential impact of the proposal upon the viability of farm land and farm businesses in Richmond.

Based on an overview of the agricultural impacts of the proposed project, it is recommended that the application be denied. This recommendation is based on the following points:

1. The agricultural capability of the Gilmore property is good. It is likely that the capability will improve if the racetrack is NOT developed.

On page 11 of Part 1, the application states that the Gilmore property has British Columbia Land Inventory (BCLI) ratings of Classes 3-5, Unimproved, and Classes 2-3, Improved. These ratings are then used by the proponent to state that the agricultural capability of the property is low.

When considering applications, the Land Reserve Commission puts much more weight on the Improved ratings than the Unimproved ratings, because the former are based on the application of expected, normal farm practices (such as installing drains in poorly-drained fields). This means that the properties would more accurately be assessed as Classes 2 and 3, both of which are considered by the Land Reserve Commission to be "prime" for agriculture.

In the consultants' report (Eveco Report – Appendix 2), it was stated that "findings suggest that the agricultural capability of the site are somewhat limited by excess water during the winter and the early part of the growing season, poor drainage throughout the year, and low fertility and high salinity in discrete areas of the property" (page 2).

Staff suggest that the limitations related to excess water could have been at least somewhat mitigated by a proposed new drainage ditch along the southern boundary of the property. The proposed ditch has been delayed by the landowner because it could inhibit the construction of a grandstand.

Still, the cultivated portion of the property has already benefited from some improvements (i.e. it is not in its "natural state"), and would likely benefit from more if the landowner were to become convinced that the racetrack will not go through. In summary, this land is and could become even more viable for agriculture.

2. The proposal will result in a net loss of farmland and farming (seed potatoes, mixed vegetables, grain, hay and pasture) currently occurring on the property.

It is difficult to say whether the proposed use is agricultural or not. The grandstand and associated buildings, the racetrack, and the gaming activity proposed on-site are clearly not agricultural, but the horse stalls, training facilities, and associated facilities and activities could be considered to be agricultural in nature. The end result is that significant portions of the activity on-site are not agricultural, and that others are marginally agricultural.

In a long-term sense, while it may be possible that portions of the racetrack development could be reverted to soil-based agriculture, this is not likely. Consider, for instance, the sites of the historic Lansdowne and Minoru Parks, which have been completely converted to urban uses. Consider also the high cost of land in Richmond's ALR as compared to other agricultural areas. Potential farmers will be unlikely to invest in a site that would require considerable conversion costs in addition to the high cost of land.

Another related issue is the recurrent theme of the proposal, as first stated on page 25 of Part 1, that "the historic Minoru (Brighthouse) and Lansdowne Parks were both located on agricultural land...." and that this fact establishes a precedent for like uses on agricultural land in the present. What this argument fails to consider is the fact that, when these other racetracks were established, agricultural land in Richmond was not as scarce, and therefore not as valuable to the community, as it is today.

In the short term, it is very clear that the proposal would result in a negative impact for existing farmers. This is due to the fact that the current farmers would be unable to continue leasing the Gilmore property. Furthermore, it is staff's understanding that current lessees have been offered seven-day leases for the past two seasons. This extremely short tenure does not afford the security required for lessees to make necessary improvements.

According to research conducted for the RAVS (Agricultural Profile, 1999), Richmond is losing farmers and farmland. It is essential that the existing farmers be assisted, not harmed, if there is to be a viable agricultural industry in this City. As Sungold's proposal would result in a loss of farmland to non-farm uses and negatively affect existing farmers, the proposal should be denied.

3. Traffic to and from the racetrack facility will adversely impact farmers. Traffic has been identified by Richmond farmers as their second most-important concern after drainage.

The proposal summarizes the anticipated impact of the racetrack on adjacent land uses on page 28, Part 1. One impact is "increased traffic, although mitigated by upgrades to Westminster Highway, Nelson Road and Highway 91 access". The Agricultural Survey Report has shown that urban traffic is the number two issue for farmers after drainage, and subsequent public consultations with farmers have supported this finding.

High-speed commuter and industrial traffic on Westminster Highway have been highlighted as posing considerable obstacles to transporting farm equipment on this roadway. The addition of considerable traffic for racetrack construction and, later, racetrack events will further limit farm equipment mobility and farm labourer safety.

The statement that "the site will not increase traffic pressures on Westminster Highway beyond current peak levels, because track operations occur during off-peak hours" (page 34, Part 1) has little relevance for agricultural operations which often do not operate during normal hours. As well, the daily operation of the Sungold proposal will generate ongoing daily urban traffic pressures.

Furthermore, the proposed new interchange on Highway 91 at Nelson Road could have unforeseen consequences regardless of racetrack-related activity. If there were to be a snarl in traffic on Highway 91, commuters will likely elect to exit the connector at the new interchange and continue their commute on Westminster Highway, thereby contributing further to the difficulty farmers have in moving equipment along this corridor.

4. It is unlikely that the project will aid and diversify Richmond agriculture by providing a market for feed and bedding material (as stated in the proposal). Richmond farms are most likely not competitive in these products.

The proposal states that the racetrack will support the diversification of the agricultural industry in Richmond. This is not clarified in Part 1, however the Appendices (Appendix 2, page 3; Appendix 8, page 8-4), state that the racetrack will enable the diversification of the local agricultural industry due to the requirement for feed and bedding material, and for the stabling and grazing of horses.

There may very well be enhanced opportunities for the stabling and grazing of horses in Richmond. One should not assume, however, that it would be cost-effective for local farmers to convert their production methods to provide horse feed and bedding. It should not be assumed that they can out-compete the alfalfa, timothy hay, and pelletized feed producers from the Okanagan, Alberta, and Washington State (where these goods are currently produced). These locales have a more favourable climate for such goods, as well as larger holding sizes which allow economies of scale to be achieved. Furthermore, most modern-day bedding material is comprised of wood chips and similar material and is not grown by farmers.

The proposal requires a much-more detailed description of how the benefits to agriculture of the racetrack are to be realized. This would include, at least, an indication of the ability and willingness of specific Richmond farms to provide feed and other products.

5. The Farmers' Market and Farm Heritage Centre aspects of the proposal are very poorly defined. These elements could conceivably support agriculture in Richmond, but the absence of details implies a lack of commitment to these concepts.

The Farmers' Market and Farm Heritage Centre aspect of the proposal could support Richmond agriculture by providing an outlet, marketing, and public awareness focal point for Richmond's farms. This feature of the proposal, however, is very poorly developed. There is a lack of detail on these endeavours, including even the location of such on the Overview of Proposed Facility map (Figure 5, Part 1). No business plans or designs for these are included or discussed. Furthermore, they are not included in the Description of Proposal on page 12 of Part 1.

Once again, the proposal requires a much more detailed description of how the benefits to agriculture of the racetrack are to be realized (i.e. Farmers' Market and Farm Heritage Centre detailed business plans (including marketing plans) and design drawings are required).

6. Appendix 9 of the proposal, which presents letters of support for the racetrack, does not demonstrate significant farmer support for this project.

Appendix 9 includes 20 letters of support for the racetrack from Richmond farmers. However, since the application was made, over 20 farmers have signed two petitions in opposition to the proposal. According to these submissions, "there is a lot of opposition to the race track in the East Richmond Farming Community" and "there will be severe negative impacts on the farms and farmers in the area". Concerns expressed include: reduced viability of existing farms, increased traffic pressures, serious affect on waterways, vandalism problems, etc.. Furthermore, in 1996, Richmond had 350 farm operators (Agricultural Profile, 1999). A significant number of farmers elsewhere have not been heard from. Of particular interest is the lack of support from the Richmond Farmers' Institute. In fact, the Delta Farmers' Institute has indicated that it cannot support the proposed Sungold horse racetrack in Richmond. To summarize, Appendix 9 does not effectively evidence farm community support for the racetrack.

7. Approval of the racetrack by Council will undermine the credibility and effectiveness of the upcoming Richmond Agricultural Viability Strategy because this is not an agricultural use. Citizens could very well consider the racetrack as an affront to the City's stated efforts to "continue to protect all farmlands in the Agricultural Land Reserve," and to "maintain and enhance agricultural viability and productivity in Richmond" (Richmond Official Community Plan, 1999).

The proposal will seriously undermine the credibility of the Council authorized Richmond Agricultural Viability Strategy (RAVS). The racetrack could very well be viewed by farmers and the public as an instance of the City supporting non-farm commercial interests to the detriment of farming, the farm community, and the rural quality of Richmond's agricultural areas.

In addition, the approval of this proposal would likely generate increased pressure from landowners and investors for non-farm uses, or outright exclusions of land from Richmond's ALR. This is clearly not consistent with the objectives of the OCP or the RAVS.

In addition, Land Use staff have noted the following specific instances of errata, misleading, or missing information in the proposal:

- Page 28 of Part 1, last paragraph: "Lands further afield are dominated by blueberry and cranberry production, industries that are currently in crisis due to dropping global markets." Cranberry producers are certainly suffering right now, but blueberry farmers are receiving very high prices and are not suffering from the same labour shortages of the last few years. Furthermore, anecdotal evidence indicates that most of Richmond's cranberry farmers are optimistic that the local industry will survive the current drop in prices.
- Appendix 8, Table 8-1. The proposal states that the project is not expected to have an impact on the price of farmland in the ALR. Staff believe that this project will bolster the speculative value of ALR properties. The message will be sent that, given enough money and planning, non-farm ventures will be supported in Richmond's ALR.
- Appendix 8, page 8-5. It is stated that the south-west corner of the property (the proposed "natural area," and current ESA) is not improveable to beyond Class 3. According to the Eveco Report included as Appendix 2, this portion can be improved to Class 2 and 3.

The following are some of the positive aspects of the proposal that Land Use staff support:

- The "green development" components of the proposal (e.g. Grasspave) on the grounds that they mitigate drainage impacts, improve the re-conversion ability of the development to agricultural use, and for their aesthetic advantages over asphalt.
- The idea of retaining the Gilmore Barn for heritage purposes and for the purpose of establishing a Farmers' Market to support local farming.
- Staff generally agree with the consultants' statement on page 8-7 of Appendix 8 that "the amount of the site being removed from soil-bound agricultural use should be viewed relative of other forms of intensive livestock or hothouse production, which may have similar or greater impact". However, these other uses are much more consistent with the main aim and intention of the ALR: to support food production within British Columbia.

In the event that this proposal is to be approved, it is recommended that it first be amended to include the following:

- A clear indication of the ability and willingness of specific Richmond farms to obtain benefit from the racetrack through the provision of feed and other products; and
- Farmers' Market and Farm Heritage Centre detailed business plans (including marketing plans) and design drawings.

Heritage

On first examination of the heritage component of the proposal, the idea of maintaining a racetrack in Richmond is attractive in that it may remind people of Richmond's history. However, looking at the proposal more realistically, it is not on an old racetrack site, will not utilize any heritage buildings and will be a modern racetrack which people will find hard to relate to Richmond's old racetracks.

In the Executive Summary under the Community Values section there is a statement that they are planning to retain the current farm buildings on-site as part of a heritage centre and Farmer's Market for displaying/selling local agricultural commodities. On page 11 of Part 1, under the heritage section, it states that "if possible, the barn, farmhouse and tree are to be retained on-site as heritage features". Subsequent site plans and text fail to provide any further indication of how these facilities will be incorporated into the Sungold development. If the proposal has any chance at claiming that it has heritage value, the house, the barn and the tree should be retained or relocated in a manner whereby the public can use it. Further information is requested.

Social Planning

Social Planning staff have spoken to the Provincial Gaming Policy Secretariat and been informed that Bill 30, the new Gaming Control Act, has received first reading in the house and that it brings racing into the framework of gaming. At the moment, the official Provincial Government position is that there is to be no expansion of gaming. So technically, no new facilities, which would include horse racetracks, could be approved as long as this policy is in place. Although there have been ongoing discussions with representatives of the racing sector about the future of this sector, the official position is as outlined above.

As part of the framework for gaming, local Government still has to approve facilities, and racing would now be part of this. Richmond City Council has already taken a position that they do not support the expansion of gaming within their jurisdiction.

Staff has asked the Provincial Gaming Policy Secretariat about any revenue sharing for new racing facilities (similar to what happens with casinos) and were advised that there is nothing in the new Act which allows for this.

Environmental Planning

The natural area proposed for retention in the applicant's documents (e.g. page 1 of Part 1) is stated to be 4.8 ha (12 ac). The Environmentally Sensitive Area (ESA) designated by the City appears to be approximately 7.1 ha (17.5 ac.). A more detailed inventory and analysis of the designated ESA and the area to be preserved on the site needs to be done.

The document states that the ESA is to be "retained as a natural reserve" (page 11 of Part 1) but also suggests that some form of "enhancements" will be undertaken for this area. More details on what the proposed enhancements will entail will be required. Furthermore, the proposed new access road to Nelson Road appears to be located in the ESA.

There is no discussion on disposal of farm wastes in the document. Significant amounts of wood chip waste which will likely be used in the horse stalls, for example, can expect to be generated by this operation. This, plus other environmental impacts (e.g. vehicle oil to the Grasspave, surface runoff, water level change impacts upon the retained ESA, noise, etc.) should be reviewed through an environmental impact study.

The proposal suggests the construction of a portion of the proposed No. 8 Road dyke. Discussion should occur with the Provincial Environmental Assessment Office to determine whether this component will require an Environmental Assessment review under Provincial legislation. Provincial criteria for reviewable projects includes "any new dyke which protects an area of (more than or equal to) 10 km² from flooding". Interpretation and applicability of this criteria may be required in this case.

Sea Island was ruled out as an alternate site for the racetrack by the proponents due to the noise impacts upon the horses. Their proposed site lies under one of the flight paths, yet there is no review of potential implications in this regard. More details are required.

ND Lea Consultants Ltd. traffic study states "for design purposes an average attendance for the project is assumed to be 8000" people (page 2 of Appendix 12). All of the vehicle arrival distributions and trip generation models are subsequently based upon this. On page 4 of the same Appendix, however, they state "for events expected to attract larger crowds (15,000+) some special traffic management plans will have to be prepared (in conjunction with City staff)....". This suggests that the full extent of the impacts upon local roads has not been fully explored. More information/ analysis is required.

Experience suggests that the proposed off ramps from Highway 91 will result in more traffic moving through the rural roads – particularly if movement along Highway 91 becomes impeded. There is no discussion on this in the report. Again, additional information/analysis is required.

Transportation

Staff have reviewed the traffic impact study for the proposed Richmond Racetrack prepared by ND Lea Consultants (retained by the applicant). A number of concerns regarding the assumptions used in the study and critical information missing from the report are noted below:

1. Traffic Generation

The traffic study projected an average daily attendance of 8,000 people for the proposed racetrack. The study focused on this average attendance but made no reference to the 15,000+ projected attendants during a special event (expected to occur more than ten times a year). The study stated that some traffic management plans would be required to accommodate this level of traffic generation during special events. However, no details were provided regarding these plans.

The traffic study assumed that 20% of the 8,000 attendants would travel to the site by shuttle buses. Staff are not convinced that one out of five attendants will choose to travel by transit. It is also doubtful that these shuttle buses (limited service between Richmond City Centre and the site) will have the capacity to carry 1,600 passengers (total inbound/outbound) during an event.

The traffic study also recommended the construction of a set of ramps on Highway 91 at Nelson Road to serve the proposed development. Staff are not certain that the introduction of this new interchange can be achieved since it will have a direct impact on the adjacent ALR. The study also assumed that 50% of the site-generated traffic will be accommodated by the Highway 91 corridor. Yet, there was no reference made in the study concerning the traffic impact on the overall Highway 91 system. Furthermore, the study did not indicate how this new interchange can be accomplished as part of the proposed racetrack, e.g. financing, assessment of ALR impact, timing, dialogue with local and senior governments and other stakeholders, etc.

The traffic study did not address the transportation needs of the employees of the proposed racetrack and did not indicate how the significant amount of service vehicles required to support this facility can be accommodated.

The study did not address the impact that the facility will place on the adjacent road network particularly at the end of an event. The study only analyzed the impact on Westminster Highway and did not provide information related to the impact on other roads in the area, e.g. No. 7 Road, No. 8 Road, Blundell Road, etc.

The study stated that "the projected traffic volumes plus existing traffic volumes for the pre-event peak hour on both a weekday evening and weekend afternoon will be similar to the existing peak traffic activity on a weekday". Staff disagree with this statement since the proposed racetrack is expected to generate a significant additional amount of traffic and will place pressure on the existing road network. The projected traffic volumes, as suggested in the consultant's report, are illustrated below:

Time	Existing Traffic Volumes	Racetrack New Trips	Combined Traffic Volumes	Traffic Increase
Fri. 4:30-5:30 p.m.	1330 veh/hr	0	1330 veh/hr	Minimal
Fri. 5:30-6:30 p.m.	900 veh/hr	880 veh/hr	1780 veh/hr	100%
Fri. 6:30-7:30 p.m.	750 veh/hr	1600 veh/hr	2350 veh/hr	200%+
Sat. afternoon peak	730 veh/hr	1600 veh/hr	2330 veh/hr	200%+

2. Traffic Impact on Westminster Highway

The traffic report stated that the proposed racetrack would not increase traffic pressure on Westminster Highway beyond that experienced during the current peak levels. As noted in the previous section, the site-generated traffic could more than double the existing traffic volumes on Westminster Highway. It is premature to assume that the proposed racetrack will not increase traffic pressure on Westminster Highway without the certainty that the Highway 91/Nelson Road Interchange can be achieved.

3. Proposed Road Improvements

The road improvements identified in the traffic report were not consistent with the City's long term transportation plan for the area. The study proposed the widening of Westminster Highway west of Nelson Road. This proposal is not consistent with the long term use of Westminster Highway envisioned by the City. The Blundell Road extension (No. 6 Road to Nelson Road) is part of the City's long term transportation plan. Yet, the study failed to identify this requirement. The traffic study also assumed the closure of No. 8 Road and the construction of a new interchange on Highway 91 at Nelson Road. Again, these improvements are not consistent with the City's long term transportation plan.

4. Long Term Transportation Plan

A number of future road improvements were identified in the OCP, including the Nelson Road upgrade and the Blundell Road extension. Although the City has a long term plan to upgrade the area road network, the implementation timing and funding required for these projects have not been determined. Neither the Nelson Road upgrades nor the Blundell Road extension is included in the City's Five-Year Capital Program. The traffic study should address the traffic impact on the area road network taking into consideration the likelihood that none of the road improvements identified in the OCP will be in place prior to the completion of the proposed development.

5. Cycling

The proposed racetrack includes an on-site cyclist centre with storage, locker and shower facilities for up to 500 cyclists. Staff are in support of the inclusion of a high quality cycling facility in the proposal. However, staff are not convinced that the inclusion of such a facility will reduce the extent of site-generated automobile use significantly. The impedances related to cycling are likely the long travel distances from any urban residential areas and the limited extent of on-street cycling facilities to and from the site.

6. Shuttle Bus

The traffic study assumed that 20% of the total travel demand (1,600 trips) to/from the site will be accommodated by shuttle buses. Depending on the size of these shuttle buses, up to 100 bus trips could be required. This level of service is equivalent to one bus trip every 2 to 5 minutes, which would be more frequent than the up-coming # 98 B-Line system. Based on the information provided in the proposal, staff are uncertain that this level of service can be provided by a private bus operator.

Engineering

The documents submitted by Sungold Entertainment Corp. in support of their application were forwarded by Development Applications Department staff to the Engineering and Public Works Departments for comments. The following is a summary of their comments.

Domestic water supply is available on Westminster Highway and Nelson Road. The Greater Vancouver Water District (GVWD) is proposing a new large watermain along the Granville Avenue alignment to be constructed in 2006. The applicant's documents are silent on what their demands would be to adequately analyze what improvements might be necessary.

Nelson Road is the main conveyance system of storm water in the area. The findings in the applicant's submission have taken this into consideration and can be accommodated.

The proposal is to participate in the sanitary forcemain being proposed by the Fraser River Port Authority to service the Fraser Port lands. The properties for the racetrack are outside the current boundary of the Fraser District catchment area. There currently are no plans to expand this area to include the racetrack lands. The Greater Vancouver Regional District (GVRD) and City of Richmond would need to approve any expansion of this catchment area. The GVRD may have some concerns with an expansion as the sewage from this catchment is treated at the Annacis Island treatment plant and the capacity of the plant was designed to handle anticipated flows from the existing and proposed catchment areas. Alternate collection and treatment of sewage may be required with approvals from the Richmond Health Department and City of Richmond.

The proposal to locate the mid-island dyke around their site could be supported, provided an engineering study is undertaken to demonstrate that this is feasible as the City has already undertaken a review of the No. 8 Road alignment. Our standard 20 m (66 ft.) right-of-way would be required. The Inspector of Dykes needs to be consulted and would also have to approve any dyke construction.

Although the applicant has provided reasonable engineering information touching on all aspects of servicing, further engineering studies need to be undertaken as to the impact this development would have on the surrounding lands. The provision of sanitary sewer is a specific concern, which requires more consultation with other agencies and the neighbouring developments. The applicant's documents have made mention of a current servicing study being undertaken by the Fraser River Port Authority for the Fraser Port lands, however the information provided by Sungold is not consistent with the Fraser Port studies. The two parties need to combine their efforts.

Health

While not related specifically to agricultural land use and ALR issues, some general comments from Richmond Health Department staff are as follows.

The applicant would have to provide for appropriate waste water and sewage disposal. The Health Department would recommend provision of sanitary sewer. If these services are not provided, the applicant must apply for and be granted a permit(s) for on-site sewage disposal prior to receiving Building Permits. Depending on the estimated daily sewage flow rates, the Ministry of Environment (MOE) may have jurisdiction for the permitting process.

The potential for odour and noise complaints from area residents resulting from site operations, traffic, etc. must be addressed. Complaints from lighting are also possible as evident from the City's experience with the nearby driving range and Hamilton area residents.

In regards to aerial pesticide applications, 500 meter buffer zones are ordinarily required between treatment areas and schools, parks, playgrounds and health care facilities unless approved in advance by the MOE (e.g. spraying when school is not in session). Pesticide treatments within one km (0.6 mile) of these uses must be completed by 7:00 a.m.

Health Department staff would encourage the preservation of green space for both passive and active recreational opportunities for Richmond residents.

ANALYSIS

Staff would like to suggest four alternative options to the Planning Committee and/or Council in dealing with this ALR application by Sungold Entertainment Corp. for a horse racetrack at 6220 and 6131 No. 8 Road.

Option 1: Deny the Application (Recommended)

City staff are recommending that this ALR application be denied on the following grounds:

- the proposal is contrary to the Agriculture designation of the subject properties and is contrary to the Official Community Plan (OCP) objectives to "continue to protect all farmlands in the Agricultural Land Reserve" and to "maintain and enhance agricultural viability and productivity in Richmond".
- the Gilmore properties have good agricultural capabilities and can be viably farmed, particularly with drainage improvements.
- the application will result in a net loss of farm land and farming (i.e. the existing farm uses on the properties - potato row crops, mixed vegetables, grain, hay and pasture - would be eliminated).
- the proposed horse racetracks, 15,000 seat grandstand, turf club, simulcast room, restaurant, conference centre, band shell, administration building, sales building, sports medicine building, pool and recreational facilities, maintenance building, 5,500 parking spaces, etc. are not agricultural uses.
- the proposed stable areas, equine therapy centre, riding school, tack and feed store, animal hospital, walking ring and horse museum are marginally agricultural.
- traffic to and from the horse racetrack will adversely impact farmers by limiting farm equipment mobility and farm labourer safety (particularly on Westminster Highway).
- the proposed new interchange at Highway 91 and Nelson Road will remove further land from the ALR and negatively impact existing farm operations.
- should the horse racetrack not develop as envisioned or be economically unviable, it would be very difficult and expensive to convert the properties back to soil-based agriculture.
- the proposal is for year-round entertainment, recreation and conference services (other horse racetracks have had to consolidate and diversify their facilities in order to remain economically viable or have sought tax reductions and installed slot machines).
- agricultural land is more scarce and valuable to the community than when the historic Minoru (Brighthouse) and Lansdowne Park racetracks were established.
- over 20 farmers have signed two petitions indicating that there is a lot opposition to the racetrack in the East Richmond farming community because of the severe negative impacts on farms and farmers in the area.

- approval of the racetrack by Council will undermine the credibility and effectiveness of the Richmond Agricultural Viability Strategy (i.e. send the message that the City supports non-farm commercial interests to the detriment of farming, the farm community and rural quality of Richmond's agricultural areas).
- approval of this project could generate increased pressure from landowners and investors for non-farm uses, or outright exclusions of land, from the ALR.
- Council has already taken the position that they do not support the expansion of gaming (which according to the Provincial Government includes horse racetracks) in the City of Richmond.
- the business viability of Sungold Entertainment Corp. has been called into question in the past.
- denying this application would finally provide some certainty to the agricultural community and existing farmers in the area.

Option 2: Approve the application

The City could approve this application and to refer it to the Land Reserve Commission for a final decision on the basis that it accepts the applicant's submissions that:

- the proposed horse racetrack will support the diversification of the agricultural industry in Richmond (i.e. requirement for feed and bedding materials and for the stabling and grazing of horses).
- the proposed Farmers' Market and Farm Heritage Centre, once clarified, could support Richmond agriculture by providing an outlet, marketing and public awareness focal point for Richmond's farms.
- the horse industry is an important agricultural activity in BC (second behind cattle in livestock and third behind poultry and eggs and dairy in expenditures).
- the application has considerable economic and community benefits, will increase the City's tax base, and will provide Richmond with international recognition.
- a significant number of letters of support have been received from farmers, the horse industry, individuals, businesses and associations.
- the "green development" components of the proposal (e.g. Grasspave) will mitigate drainage impacts, improve the re-conversion ability of the development to agricultural use, and has aesthetic advantages over asphalt.
- the application will control the drainage on-site and improve the regional canals to handle storm water off-site.
- the proposed horse racetrack is a good buffer between the Fraser Port industrial lands to the south and the agricultural lands to the north.
- there are no other locations in Richmond outside the ALR for this proposal.
- the applicant will endeavour to protect the heritage resources and ESA on the properties.
- Sungold will build a portion of the mid island dyke if necessary (and relocate it to Nelson Road).
- there will be no slot machines or casinos in the development.
- Sungold has attempted to address the City's concerns with regard to the previous ALR application (AG 98-141695) which was denied (e.g. Fraser River Port Authority was unsuccessfully approached about locating the grandstand on the Fraser Port lands).
- horse racing has a historic tradition in Richmond and racetracks were previously located on agricultural land.

Option 3: Refer the decision to the Land Reserve Commission

Another option would be to refer this ALR application to the Land Reserve Commission without a recommendation from the Planning Committee and/or Council. Reasons in support of this option are:

- to determine if the proposal can be considered as a special case use application in the ALR as suggested by the applicant (i.e. "horse riding arenas or boarding stables");
- the Commission has the expertise to determine whether the proposed horse racetrack will have a net benefit to agriculture in Richmond and the province as a whole.
- to ascertain the applicant's concern that the denial of this application could result in the departure of the horse industry from British Columbia's agricultural landscape.
- the Commission could determine if the proposed horse racetrack is in the Provincial interest.
- the Land Reserve Commission could impartially consult with the other cities who have been examined by the applicant as an alternate site for an official position.
- the Commission is in a better position to determine if a 92 ha (227 ac.) site is necessary for a horse racetrack.
- direction could be received from Land Reserve staff as to whether or not smaller parcels of land in Richmond (e.g. McLennan area) should be opened up to support the horse industry.
- the Commission needs to decide if it would support a new interchange at Highway 91 and Nelson Road (and the possible extension of Blundell Road to service the area).
- the applicant has requested the City and Land Reserve Commission's urgent attention to this proposal in order to open the horse racetrack by April, 2002.
- the City will be able to deal with the proposal further when the subject properties are proposed to be rezoned.

Option 4: Table the Application for Further Information from the Applicant

There are a number of outstanding issues that require further work by the applicant, including the following:

- a much-more detailed description is required of how the benefits to agriculture of the racetrack will be realized (i.e. ability and willingness of specific Richmond farms to provide feed and other products and to compete with other agricultural areas with more favourable climates and larger holding sizes).
- detailed business plans (including marketing plans) and design drawings for the proposed Farmers' Market and Farm Heritage Centre.
- clarification of how the heritage features on 6220 No. 8 Road (Wilson/Gilmore barn, Gilmore farm house and significant big leaf maple tree) will be retained or relocated on the site and incorporated into the horse racetrack development for the public to use.
- detailed soil survey for the excavation/reclamation of the site, including a hydrological assessment of how drainage in the area will be addressed.
- feasibility of reclaiming the grandstand and parking areas to agriculture should the horse racetrack be unsuccessful.
- the impact upon local roads (i.e. No. 7 Road, No. 8 Road, etc. and Westminster Highway) at the end of a normal day of operation, for events expected to attract larger crowds (15,000+) and should Highway 91 be congested or closed.
- traffic impact on Highway 91 and commitment as to how the proposed interchange at Nelson Road would be implemented as part of the approval process and what would happen if it was not built.

- proof that 20% of the attendees will utilize shuttle buses and details regarding the size, frequency, destination, etc. of these buses.
- address the transportation needs for the employees of the proposed racetrack and the servicing vehicles generated to support this facility.
- approval from the owner of 6211 Nelson Road to locate the proposed access road through this property to the development.
- consultation with the Fraser River Port Authority and other neighbouring landowners with regard to proposed road improvements and servicing (i.e. closure of No. 8 Road, widening of Westminster Highway west of Nelson Road, new interchange at Highway 91, extension of Blundell Road, sanitary sewer connection to the Kingswood properties, proposed sanitary forcemain to service the Fraser Port lands, etc.).
- the traffic and servicing reports should address what would happen if the proposed horse racetrack would have to utilize the existing road network and servicing (i.e. until the Fraser Port lands are developed).
- approval from the GVRD for the expansion of the Fraser District sewer catchment area.
- approval of the Richmond Health Department or Ministry of Environment if on-site sewage disposal is proposed instead of the connection to sanitary sewer.
- information on the water demands for the horse racetrack and associated facilities and how the proposed new watermain along the Granville Avenue alignment will be impacted by these improvements.
- engineering study to prove that the proposed relocation of the No. 8 Road dyke to Nelson Road is feasible and approval of the Inspector of Dykes with regard to this proposal.
- written confirmation from the Provincial Environmental Assessment Office whether or not an Environmental Assessment review is required for the construction of a portion of No. 8 Road dyke.
- environmental impact study dealing with issues such as: the disposal of farm wastes, vehicle oil to the Grasspave, surface runoff, water level changes impacts on the ESA, airport and racetrack noises, lighting complaints, pesticide management, etc..
- local evidence that the use of Grasspave in the parking areas and Gravelpave on the roadways will work in view of the drainage issues in Richmond, local rainfall and amount of daily traffic on these areas.
- a Development Permit application for the ESA in the south-west corner and southern boundary of 6131 No. 8 Road, including a more detailed inventory and analysis of this natural area and what enhancements will be done as part of the horse racetrack proposal.
- further information from the applicant regarding the proposal to grant 6% of pre-tax profits to a Richmond Community First Fund and to establish a Richmond First policy when purchasing agricultural products for on-site food outlets.
- approval from the Provincial Gaming Policy Secretariat for this new gaming facility and decision regarding revenue sharing for the horse racetrack (similar to what happens with casinos).
- details regarding how 500 bicyclists would get to the site and how this would reduce the number of automobile trips.
- ensure that the BC Gas and BC Hydro lines can be relocated from the site.

FINANCIAL IMPACT

The financial implications of this application to the City of Richmond have yet to be determined (and if necessary can be done at the rezoning and OCP amendment stage).

CONCLUSION

Sungold Entertainment Corp. has applied for permission to locate a horse racetrack in the Agricultural Land Reserve (ALR) at 6220 and 6131 No. 8 Road. A substantial amount of information has been submitted by the applicant. The City has received numerous letters of support and some in opposition (particularly from East Richmond farmers) to the proposal. Staff have thoroughly reviewed this material and have identified four options for the Planning Committee and/or Council. It is recommended that the application be denied for the reasons outlined in the Staff Comments and Analysis sections of this report.



Holger Burke, MCIP
Development Coordinator

HB:blg



City of Richmond

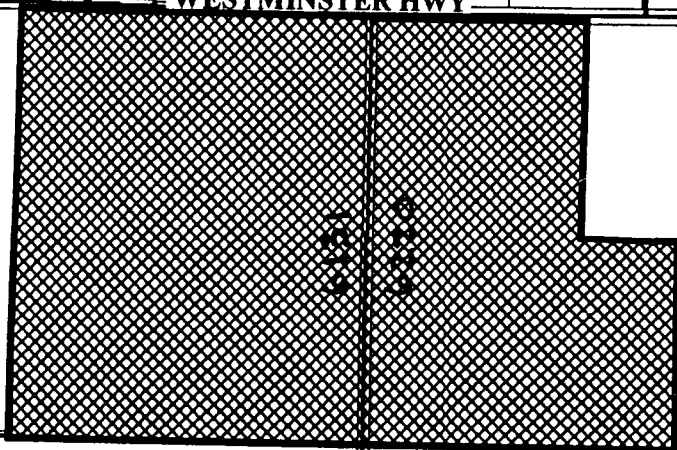
SITE

NO. 8 RD

WESTMINSTER HWY

KARTNER RD R/W

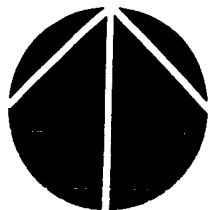
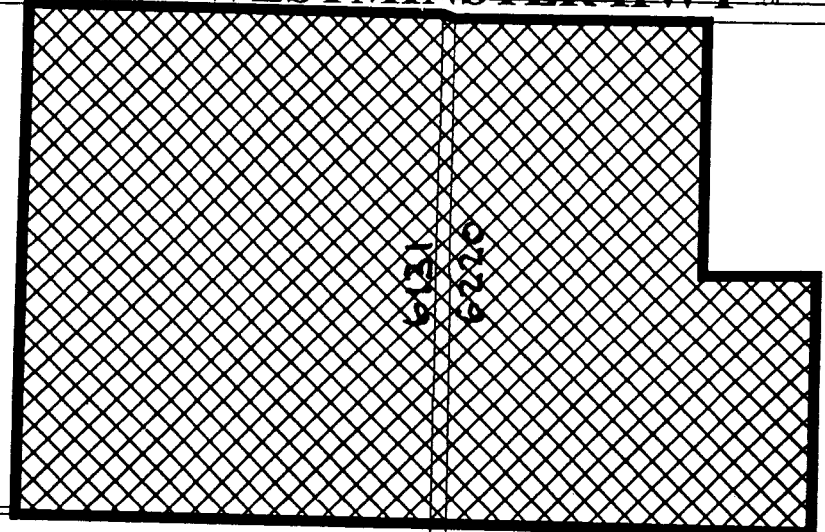
124



NO. 8 RD

WESTMINSTER HWY

124
6270



AG 00-176704

Original Date: 07/25/00

Revision Date:

Note: Dimensions are in METRES