



City of Richmond

Report to Committee

To: Planning Committee

Date: September 24, 2025

From: Joshua Reis
Director, Development

File: AG 25-019652

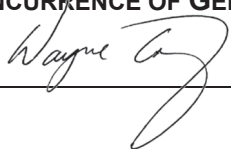
Re: **Application by Sanstor Farms Ltd. for an Agricultural Land Reserve Non-Farm Use (Sand Storage and Truck Parking) at 14671 Williams Road**

Staff Recommendation

That authorization to forward an Agricultural Land Reserve Non-Farm Use application to the Agricultural Land Commission for the storage of sand and commercial vehicle truck parking by Sanstor Farms Ltd. be denied.

Joshua Reis
Director, Development
(604-247-4625)

Att. 8

REPORT CONCURRENCE		
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER
Transportation	<input checked="" type="checkbox"/>	
Policy Planning	<input checked="" type="checkbox"/>	

Staff Report

Origin

Sanstor Farms Ltd. (Directors – B. Mathers; J. Mathers) has submitted an Agricultural Land Reserve (ALR) Non-Farm Use application to permit the storage of sand on the eastern 5 ha. (12.4 ac.) portion of the subject site. Commercial truck parking is proposed on the remaining western 3.15 ha. (7.8 ac.) portion of the subject site. A location map and air photo of the subject site is provided in Attachment 1. The property is located in the ALR, designated “Agriculture (AGR)” in the Official Community Plan (OCP) and zoned “Agriculture (AG1)”.

The proposed non-farm use application is inconsistent with the applicable land use designations and policies of the City and Metro Vancouver, and the purpose of the Agricultural Land Commission, generally including the following:

- **OCP and Farming First Strategy:** the subject property is designated for agriculture in the City’s OCP and the Metro Vancouver Regional Growth Strategy (RGS). Policies in the City’s OCP and Farming First Strategy also include protecting the ALR, discouraging non-farm uses in the ALR, and encouraging the use of ALR land for farming. The proposal is contrary to the local and regional land use designations and policies.
- **Agricultural Land Commission (ALC) Act:** the subject property is in the ALR and subject to the *ALC Act*. As per the *ALC Act*, the purpose of the Commission is to preserve the ALR, encourage farming, and accommodate farm use. The proposal is contrary to the stated purpose of the ALC.
- **Industrial Land Intensification Initiative:** the City’s Industrial Land Intensification Initiative (ILII) includes policy to protect and strengthen existing industrial zoned and designated land, rather than expanding into non-industrial agricultural areas. The proposal to allow industrial uses on agricultural land is contrary to this policy.

Staff are recommending that authorization to forward the proposed non-farm use application to the ALC be denied. Should City Council deny the application, the application will not be forwarded to the ALC for their consideration.

Background

Previous ALR Non-Farm Use Application (AG 16-734186)

The applicant submitted a previous ALR Non-Farm Use application (AG 16-734186) that proposed using the eastern 5 ha (12.4 ha) portion of the site for sand storage. The remaining areas of the site were proposed to be farmed with various soil and site improvements to be undertaken based on the recommendations of the applicant’s consulting agrologist.

The City staff report dated July 13, 2017 recommended that the application be denied. Council considered the application at its meeting of July 24, 2017 and resolved to forward the application to the ALC for consideration.

On January 16, 2018, the South Coast Panel of the ALC released its decision that the majority of the Panel approved the non-farm use application. However, on January 31, 2018, the City was informed that the ALC Chair had reviewed the decision made by the Panel and had referred the

matter to the Executive Committee of the Commission for reconsideration citing concerns that the Panel's decision may not fulfill the purpose of the ALC in accordance with the *ALC Act*.

On April 17, 2018, the Executive Committee reversed the decision of the South Coast Panel and refused the non-farm use application for sand storage on the subject property. In its decision the Executive Committee indicated that the majority of the Committee found that the proposal does not preserve agricultural land as:

- the proposal is an industrial use and is therefore more appropriately located on land that is available outside of the ALR; and,
- the property would be used indefinitely for an industrial use that is more appropriately located outside of the ALR.

The applicant did not request any further reconsideration of the Executive Committee's decision at that time.

History of Activities on the Site

The subject site has an Environmentally Sensitive Area (ESA) designation that applies to a majority of the east portion of the property. A location map of the ESA is provided in Attachment 2. On the west portion of the property, the owner leases this area to a farmer who operates a vegetable farm on the property. Since 2018, the subject property has received Farm Class status in accordance with the site's BC Assessment.

In January 2021, City staff observed land clearing activities on the subject site that involved ESA designated areas and contacted the Owner to request information regarding these activities. In June 2021, the applicant submitted the current notice of assessment from BC Assessment to confirm the Farm Class status of the property. In addition, a letter (Attachment 3) was provided at that time from Sanstor Farms Ltd. confirming the owner's intention to expand the existing agricultural operations onto the recently cleared area. In accordance with Provincial *Farm Practices Protection (Right to Farm) Act* legislation which supersedes the City's ESA Development Permit, a Development Permit is not required for farming activity.

Since the above clearing activities that occurred in 2021, no further on-site activities have been undertaken to further expand agricultural production on the subject site in accordance with the owners previously submitted correspondence and the area cleared remains fallow.

Surrounding Development

To the North: an Agriculture (AG1) zoned property that is located in the ALR.

To the East: an Industrial (I) zoned property which is proposed to be developed into a multi-phased industrial development (15111 Williams Road). This neighbouring site currently contains the sand storage facility operated by the applicant on land leased from the property owner (Montrose Industries). This area is not in the ALR.

To the South: on the west side of Triangle Road, an Agriculture (AG1) zoned property and located in the ALR with a single detached house, greenhouse farming activity and

soil based agriculture. On the east side of Triangle Road, a Light Industrial (IL) zoned property not in the ALR that is owned by the City of Richmond.

To the West: an Agriculture (AG1) zoned property located in the ALR containing soil based agricultural activities.

Findings of Fact

A Development Application Data Sheet providing details about the development proposal is contained in Attachment 4. A general plan of the proposed land uses and surrounding context is provided in Attachment 5. The applicant's Agrologist Report submitted in support of the ALR Non-Farm Use application is provided in Attachment 6.

The subject site contains an existing single-family dwelling fronting Williams Road which the applicant has noted is occupied. The applicant has indicated that the western 3.15 ha. (7.8 ac.) portion of the property is currently being leased to a vegetable farmer on a year-to-year basis. The eastern 5 ha. (12.4 ac.) of the subject site, has been cleared of existing vegetation and trees and windrowed on the site.

Mathers Bulldozing, which is a subsidiary of Sanstor Farms Ltd., currently operates a dredged river sand storage facility on industrial zoned lands adjacent to the subject property at 15111 Williams Road (owned by Montrose Industries – formerly Ecowaste Industries). Mathers Bulldozing currently leases the land from Montrose Industries. The applicant has indicated that their current year-to-year lease will end in 2026 and has advised that the property owner is not willing to continue this lease as a result of the Montrose Industries industrial redevelopment plans for their lands.

The applicant's current sand storage operations located at 15111 Williams Road rely on the site's close proximity to the south arm of the Fraser River to ensure infrastructure consisting of piping and pumps is capable of transporting the dredged river sand to the site and that the dredged sand meets the criteria that Mathers Bulldozing and their clients requires for both agricultural and construction applications based on the quality and composition of the materials.

Proposed Sand Storage Operation

The proposed sand storage operations would occupy the eastern 5 ha. (12.4 ac.) of the subject site, which would be relocated from their current location on the neighboring site at 15111 Williams Road. Equipment and infrastructure (pumps and piping) to move the dredged sand from the river to the subject site would be required. This existing infrastructure that services current operations at 15111 Williams Road would need to be modified to service the subject site.

The total specific volume of dredged river sand to be stored on the eastern portion of the property or related information about height of potential sand storage piles or their setback from current property lines has not been provided in the application. The application notes that the sand storage activities and amount of materials placed on the subject site is dependent on dredging activities from the river.

Once on-site, the stored sand would then be sold and transported off-site with dump trucks for various agricultural and construction related applications. River sand dredging and storing operations provides a service to the agricultural and construction industry.

The applicant has indicated that the approximate proportion of sand provided for agricultural activities is 25% and the remaining 75% of sand materials is provided to other construction related activities and that these proportions are subject to change as result of market demand and conditions. Additional supporting installations/structures on-site would include use of the existing dwelling as an office and installation of an on-site scale.

Proposed Commercial Vehicle (Truck) Parking Operation

Commercial truck parking is proposed on the western 3.15 ha. (7.8 ha.) of the subject property which is currently leased to a vegetable farmer and is actively farmed.

The applicant's proposal indicates that approximately 130 trucks can be accommodated within this area. Site preparation activities would include the placement of a sand base (approximately 1 m depth) that would be capped with 0.3 m of road base gravel for the proposed truck parking area. The applicant has indicated that they will not operate the proposed truck parking facility, nor do they have an agreement in place with a potential operator at this time. Sanstor Farms Ltd. has indicated they would be open to leasing the commercial truck parking area to a qualified operator or to the City of Richmond at a nominal lease cost and to cover annual property taxes. Any future operator would determine the overall operational parameters of the facility.

Duration and Future Site Reclamation

The applicant has indicated that proposed duration of the sand storage and truck parking operations is 25 years or sooner in the event that Sanstor Farms Ltd. cease proposed activities on the subject site.

After the 25-year period, the applicant proposes to undertake site reclamation and includes:

- Removal of equipment and infrastructure associated with the sand storage operations (i.e., scale and supporting structures).
- Removal of the gravel road base and retain and/or place sand over the entire site to achieve a finished grade approximately 1.0 m elevation above Geodetic Survey of Canada (GSC).
- Import and place Class A compost to a depth of 0.3 m on top of the sand and cultivate to a depth of 0.6 m.
- Install subsurface drainage and suitable irrigation in accordance with a plan prepared by a professional agrologist.
- The applicant has identified a cost estimate (including contingency) of \$850,000 to undertake these reclamation activities.

In BC, agricultural land capability is classified into seven classes (Classed 1 to 7). Class 1 land is considered the best soil for farming with minimal limitations whereas the limitations increase between Class 2 to Class 5 lands. Class 6 and 7 lands have limitations that preclude arable agricultural activities yet are capable of sustaining native and/or perennial uncultivated agriculture. The applicant's consulting agrologists has assessed the subject site as follows:

- Current condition – Class 5 with soil and drainage limitations.
- Future condition (after reclamation) – Class 2 so long as drainage and irrigation improvements in place.

Applicant's Proposal to Include Land into the ALR – Deroche, BC

In the applicant's ALR Non-Farm Use application submission package, reference is made to a separate application to include 12.2 ha. (30.2 ac.) of land into the ALR in Deroche, British Columbia, which is located in the Fraser Valley north of the Fraser River and north east of Chilliwack. There is no operational linkage between the property in Deroche and the subject site at 14671 Williams Road.

The Deroche application for inclusion of land into the ALR was approved by the Fraser Valley Regional District Board and has been submitted and received by the ALC for processing on August 1, 2025. This ALR inclusion application references that it is coincident with the subject ALR Non-Farm Use application submitted by Sanstor Farms Ltd. for the subject property.

While the inclusion of land in Deroche provides an increase in ALR land provincially, the inclusion of these lands does not benefit agricultural activities in Richmond.

Related Policies and Studies

2041 Official Community Plan / Farming First Strategy

The Official Community Plan (OCP) land use designation for the subject property is "Agriculture (AGR)", which comprises of those areas of the City where the principal use is agriculture and food production, but may include other land uses as permitted under the *ALC Act*.

The proposed non-farm use application is inconsistent with the land use designation and applicable policies in the OCP/Farming First Strategy and ILII:

OCP Policy / Farming First Strategy / ILII	Subject Application
Maintain the existing ALR boundary and do not support a loss of ALR land.	<ul style="list-style-type: none"> • The property is located in the ALR and subject to the <i>ALC Act</i>. • The proposal is to use the property for a sand storage facility and commercial truck parking, which are both industrial uses. • Allowing the property to be used for industrial uses undermines the intent of the policy to protect the ALR for farming. • The proposal for the sand storage facility and truck parking would remove the ability for agricultural land in the ALR to be farmed until these activities conclude and the land is reclaimed to a suitable agricultural standard.
Continue to encourage the use of the ALR land for farming and discourage non-farm uses.	<ul style="list-style-type: none"> • The purpose of the application is to use the land for non-farm use (storage of sand and commercial truck parking). • The western 3.15 ha. (7.8 ac.) is currently farmed and the subject property has Farm Class in accordance with the current BC

OCP Policy / Farming First Strategy / ILII	Subject Application
	<p>Assessment for the subject property. Current farming activities on the subject site would be removed as a result of the proposal.</p> <ul style="list-style-type: none"> • The proposal prioritizes use of the subject site for non-farm uses. Farming would not occur until the non-farm uses conclude and agricultural reclamation activities are complete. • Although site specific challenges exist for the subject site that currently limit agricultural capability, the applicant's agrologist has demonstrated a farm reclamation plan that can improve the agricultural capability of the site. Allowing non-farm uses on the subject site is contrary to City land use policies to ensure that agricultural production remains the primary use of agricultural land. • There is appropriately zoned land in the city that accommodate sand storage facilities and commercial truck parking.
Coordinate with Metro Vancouver to support the Regional Growth Strategy, which includes agricultural designations and policies for protection of agricultural land.	<ul style="list-style-type: none"> • The subject property is designated "Agriculture" in the Metro Vancouver Regional Growth Strategy. • The proposal is not consistent with the regional land use designation and does not support agricultural viability.
Industrial Lands Intensification Initiative (ILII) - Policies to protect and strengthen existing industrial zoned and designated land.	<ul style="list-style-type: none"> • The proposal to allow industrial uses on agricultural land is contrary to this policy.

Subject Site Current Zoning – Agriculture (AG1)

The current zoning of the subject property is Agriculture (AG1). The non-farm uses of sand storage facility operations and commercial truck parking are not permitted in the Agriculture (AG1) zoning for the subject site. If the ALR Non-Farm Use application is endorsed by Council and approved by the ALC, a future rezoning application will be required to amend the zoning that would need to take into account any applicable non-farm use approval conditions. The rezoning application will also involve a comprehensive technical review to be undertaken by applicable City stakeholders to ensure all issues are addressed.

Current Zones that Allow for Sand Storage and Truck Parking

Sand storage activities are permitted in the Industrial (I) and Industrial Storage (IS) zoning districts. Commercial truck parking is permitted in all of the City's standard industrial zones (Industrial I; Light Industrial IL; Business Park Industrial IB1; Industrial Retail IR; Industrial Storage IS).

Commercial truck parking is also prohibited in the ALR. City Zoning Bylaw regulations only allow for truck parking in the ALR where those vehicles are utilized as part of a farm operation and owned/operated by an owner or occupant of the land. The City's restrictions for truck parking in the ALR are consistent with Provincial restrictions outlined in the *ALC Act* and *Agricultural Land Reserve Use Regulation* legislation.

Environmentally Sensitive Area Designation and Riparian Management Area

The subject site has an ESA Development Permit Area designation over a majority of the eastern portion of the site and also around the north and west edges of the property. A map of the ESA designation on the subject site is provided in Attachment 2. In addition, a Riparian Management Area (RMA) runs along the south side of the subject property which is part of a watercourse within the Williams Road allowance. Provincial and City regulations restrict activities within the 5 m (16.4 ft.) RMA setback.

The submission of an ESA Development Permit application would be required if the ALC Non-Farm Use application is endorsed by Council and approved by the ALC. An ESA Development Permit application would be processed after but in coordination with a rezoning application. RMA would be part of the ecological and hydrological assessment submitted through the Rezoning and Development Permit applications that would be required if this ALR Non-Farm Use application is approved.

Consultation

Food Security and Agricultural Advisory Committee

The subject proposal was reviewed by the City's Food Security and Agricultural Advisory Committee (FSAAC) on July 31, 2025. A majority of the FSAAC supported the following motion with two members opposed (see Attachment 7 for an excerpt of the July 31, 2025 FSAAC meeting minutes):

That the Food Security and Agricultural Advisory Committee endorse the Non-Farm Use application at 14671 Williams Road.

Applicant Submitted Correspondence

The applicant's submission package includes previous correspondence (2015) from businesses that use dredged river sand supplied by the applicant as part of their operations, some of which involve agricultural production. A letter (2019) from the Port of Vancouver is also submitted in relation to the proposed sand storage facility for the subject site. The correspondence submitted by the applicant as part of their submission is included in Attachment 8 and only references the proposed sand storage activities. No reference or support is communicated toward the proposed commercial truck activities.

Analysis

The proposal is not consistent with land use policies for OCP designated Agricultural areas within the ALR. These land use policies support use of land that prioritizes active farming and agricultural production. The proposal includes a plan to undertake agricultural reclamation work on the subject property after conclusion of the non-farm uses proposed on the site and does not provide a more immediate benefit to agriculture.

Outdoor storage of sand and commercial truck parking are industrial in nature and support industrial activities and operations. Outdoor storage of sand would be permitted in the City's existing Industrial (I) and Industrial Storage (IS) zones across the City. Commercial truck parking is permitted in all standard industrial zones (Industrial I; Light Industrial IL; Business

Park Industrial IB1; Industrial Retail IR; Industrial Storage IS) across the City. These uses should be located on land that is designated and zoned for industrial purposes and not located in agricultural areas.

Locational Factors and Considerations

The sand storage component of the proposal is permitted in the Industrial (I) and Industrial Storage (IS) zones in the City. The current sand storage activities operated by the applicant (through Mathers Bulldozing) are located on leased land on the neighboring site to the east (15111 Williams Road) with appropriate Industrial (I) zoning. Due to the nature of the operations, the applicant notes specific locational criteria of being in close proximity to the south arm of the Fraser River that they need to consider when examining potential alternative locations. This is due to their operations involving dredging and pumping river sand directly onto their sand storage site. Furthermore, the applicant notes that the sand dredged from the south arm of the Fraser River meets the specific criteria (i.e., limited salinity levels and material composition) for the customers that purchase and use the sand.

Commercial truck parking is a permitted use in all standard industrial zones. The proposed use of the subject site for commercial truck parking is not based on the site's location or proximity to other uses. Proposals to use farmland for commercial truck parking are not supported and are not consistent with OCP land use policy for agricultural areas.

Future Development Applications Required if Non-Farm Use Application Approved

Should Council choose to endorse the ALR Non-Farm Use application, it will be forwarded to the ALC for review and consideration of the application. If the ALC approves the application a rezoning application and ESA Development Permit application would be required to be submitted to the City. Through these applications, a comprehensive technical review by City staff will be undertaken including, but not limited to, consideration of the following:

- any conditions associated with the City or ALC's decision or the separate ALR Inclusion application proposed in Deroche, BC;
- regulations on the height and volume of the sand piles, in addition to establishing minimum setbacks;
- review of all necessary private infrastructure necessary for the transportation of dredged river sand to the subject property to ensure City infrastructure is protected and any impacts are fully addressed;
- the road and transportation infrastructure surrounding this area is not designed for increased industrial traffic resulting from this proposal and as a result, the review and approval of a traffic management plan and assessment of transportation impacts and any necessary off-site road improvements to support increased commercial vehicle activity and maintain public safety will be required;
- for the proposed commercial truck parking activity, information to confirm who will be operating this facility (including applicable lease terms), operational information (hours; staffing requirements), required site installations and improvements to address matters related to site access/security, lighting, restroom and other driver amenity facilities and required site servicing (drainage and water service).

- secure appropriate mechanisms and bonding to ensure all associated agricultural remediation activities are implemented on the property once the proposed non-farm uses cease/conclude on the property;
- an ecological and hydrological assessment of the impact of the land use proposal on the areas designated as an ESA or RMA and identify how those impacts could be mitigated, managed and/or compensated and taking into account the previously described land clearing activities in 2021;
- securing a 5m RMA buffer along the south property line; and,
- dust mitigation measures.

Financial Impact

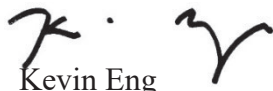
None.

Conclusion

Sanstor Farms Ltd. has submitted an Agricultural Land Reserve (ALR) Non-Farm Use application for the site at 14671 Williams Road that proposes a sand storage operation the eastern 5 ha. (12.4 ac.) portion of the site and commercial truck parking on the remaining western 3.15 ha. (7.8 ac.) portion of the site.

The subject application has been reviewed and is not consistent with the City's OCP and associated land use policies to preserve and protect agricultural land for farming purposes.

Staff recommend that ALR Non-Farm Use application at 14671 Williams Road be denied.



Kevin Eng
Planner 3
(604-247-4626)

KE:cas

Att. 1: Location Map

2: Environmentally Sensitive Area Map

3: Sanstor Farms Ltd. – Farming Letter (2021)

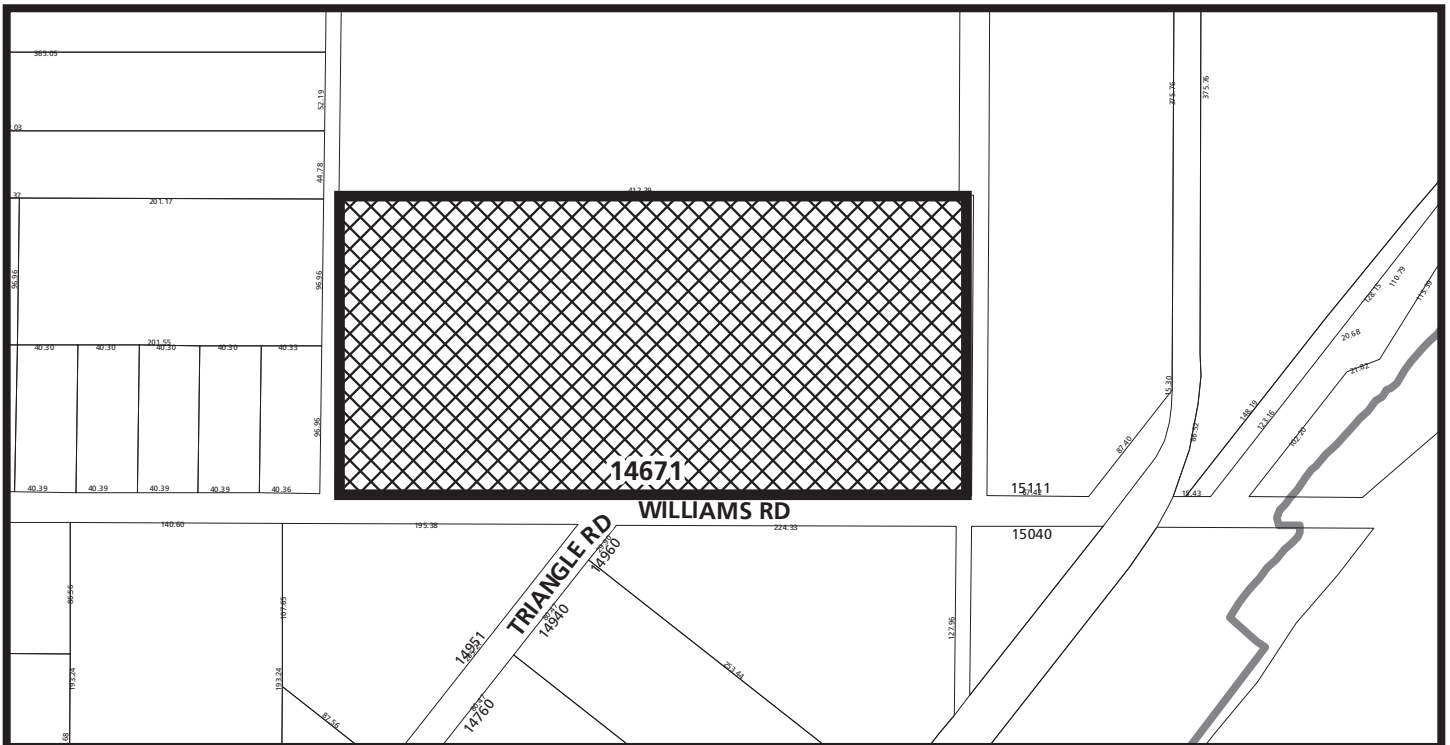
4: Development Applications Data Sheet

5: 14671 Williams Road – Proposed Land Uses

6: Submitted Agrologist Report (Excludes Appendices)

7: Excerpt of Food Security and Agricultural Advisory Committee July 31, 2025 meeting minutes

8: Applicant Submitted Correspondence



AG 25-019652

PLN – 16

Original Date: 07/17/25
Revision Date:

Note: Dimensions are in METRES



City of
Richmond



AG 25-019652

PLN - 17

Original Date: 07/17/25
Revision Date:

Note: Dimensions are in METRES



Legend

-  Subject Site - 14671 Williams Road
-  ESA

Note:

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PLN - 18



City of
Richmond

September 19, 2025
Prepared by Onkar Buttar



Sanstor Farms Ltd.
11700 No. 5 Road
Richmond, BC
V7A 4E7

May 31, 2021

City of Richmond
6911 No. 3 Road
Richmond, BC
V6Y 2C1

Attn; Edwin Lee – City of Richmond

Sanstor farms Ltd. owns the farm located at 14671 Williams road. We have recently cleared all of the trees and placed into windrows to be mulched. The stand of trees consisted predominantly of European Birch with nearly all of the trees being dead due to the bronze birch borer.

It is Sanstor's farms goal to utilize this portion of land that the City of Richmond deemed and ESA as farmland. The 8 acres on the property which is currently being farmed will be increase to include the newly cleared area for the purpose of growing vegetables. Currently the farm has been producing Egg plants, Tinda, Squash and pumpkins.

Respectfully;



Bruce Mathers
Sanstor Farms Ltd.



AG 25-019652

Attachment 4



Address: 14671 Williams Road

Applicant: Sanstor Farms

	Existing	Proposed
Owner:	Sanstor Farms Ltd	No change
Site Size:	8.4 ha (20.6 ac.)	No change
Land Uses:	West portion – farming field East portion – fallow field Existing house along Williams Road	West 3.15 ha. (7.8 ac.) – commercial truck parking East 5 ha. (12.4 ha) – sand storage
OCP Designation:	Agriculture (AGR)	No change
Zoning:	Agriculture (AG1)	Rezoning would be required to allow commercial truck parking and sand storage operations
Other Designations:	Agricultural Land Reserve (ALR) Environmentally Sensitive Area (ESA) Designation	Non-farm use for commercial truck parking and sand storage operations. ESA Development Permit application required to address impacts, mitigation and compensation to ESA



Legend

-  Subject Property - 14671 Williams Road
-  ALR Boundary

Note:
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PLAN - 21



City of
Richmond

September 17, 2025
Prepared by Onkar Buttar



C&F LAND RESOURCE CONSULTANTS LTD.

*4383 Happy Valley Road, Victoria, B.C. V9C 3Z3
(250)474-5072; fax:(250)474-5073; email: cflrc@shaw.ca*

AGRICULTURAL LAND ASSESSMENT REPORT

FOR

14671 WILLIAMS ROAD, RICHMOND, B.C.

NON-FARM USE APPLICATION

**Prepared for: Mr. Bruce Mathers
Sanstor Farms Ltd.
11700 No. 5 Road
Richmond, B.C. V7A 4E7**

Prepared by: Brian M. French, P.Ag.

Report date: July 28, 2025

Version: Revised from April 20, 2016

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Appendix A: Resume of Experience, Brian French, P.Ag.

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Appendix C: Soil Survey Field Notes

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Appendix F: Excerpts From MOE Manual 1

Appendix G: Letters of Support from Farmers

Appendix H: Letter from Bruce Richardson for Alternative Site Search

Appendix I: C&F Report on Search for Alternative Sites in Richmond

Appendix J: Letter from Tom Corsie, Vancouver Fraser Port Authority

References

1. The Canadian System of Soil Classification; Soil Classification Working Group, Research Branch, Agriculture and AgriFood Canada; Publication 1646, Third Edition, 1998.
2. Soil Inventory Methods for BC (1995); Resource Inventory Committee; Province of British Columbia.
3. Land Capability Classification for Agriculture in British Columbia; MOE Manual 1; Ministry of Environment, Surveys and Resource Mapping Branch and Ministry of Agriculture and Food, Soils Branch; Kelowna British Columbia, April 1983
4. Criteria for Agricultural Capability Assessments; ALC Policy P-10, February 2024.
5. Expert Opinions In Agricultural Land Commission Matters; ALC Policy P-11, February 2024.
6. RAB Bulletin 18, Soils of the Langley - Vancouver Map Area; Report No. 15, British Columbia Soil Survey; Volume 1, Soil Map and Legend, Lower Fraser Valley (Scale 1:25,000); H.A. Luttmerding, Kelowna, 1980.
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8. Land Capability for Agriculture Langley - Vancouver Map Area; Surveys and Resource Mapping Branch, Ministry of Environment, Victoria, British Columbia, 1985

EXECUTIVE SUMMARY

E. Mathers Bulldozing has operated a dredged sand site on land owned by Ecowaste Industries at the east end of Williams Road for decades. As Ecowaste transitions this site to industrial warehouse use, it is unwilling to continue the lease with Mathers and the year to year lease will terminate in 2026. Dredging of the Fraser River east of Massey Tunnel is critical to maintaining a safe channel in the river for mariners. The Mathers site has been used for decades as a depository for the dredged sand and it is important to find an alternative site. The Vancouver Fraser Port Authority is concerned that it will lose this critical river maintenance infrastructure unless the Sanstor site is approved because there are no other sites available in the local area.

A detailed survey of all sites along the Fraser River in Richmond determined that there are no unoccupied sites in Richmond which could support the sand storage facility and, in particular, no sites within a reasonable dredge pumping distance from the critical shipping channel site currently serviced by the Mathers site at Ecowaste.

Mathers, under a subsidiary company, Sanstor Farms Ltd., purchased the adjacent property to the west, the subject of this application with the intent to seek permission to move its sand storage operation onto the eastern 5 hectares of this property. Sanstor is requesting approval to carry out the sand storage operation for a period of 25 years and then decommission the site and reclaim it to Class 2 agricultural capability. Sanstor is also asking for approval to allow a commercial truck parking facility to be developed on the western 3.15 hectares of the site for a period of 25 years. This facility would help alleviate serious illegal truck parking which occurs on farmland in the ALR in Richmond.

A detailed soil survey and agricultural capability assessment was carried out in 2016 and it was determined that the property has severe soil and drainage based limitations at the Class 5 level which would be difficult to improve due to perennial high water tables and periodic flooding which damages or kills crops on the site. An unimproved Class 5 capability rating was applied because this problem is a regional drainage issue which the land owner cannot control.

The proposed sand storage site is well buffered from any agricultural activity and is a low impact use which does not produce significant dust or noise in this heavy industrial area. Similarly, truck parking is a low impact use on this heavily used truck route. The traffic volume would not change from the current operation except for a marginal increase due to the truck parking use. Williams - Triangle Road is a heavily used truck route.

Sanstor intends to offer inclusion of 12.2 hectares of high quality land in Deroche into the ALR to offset the temporary non-farm use on the Williams Road property. The property in Deroche is part of a large dairy operation on Nicomen Island and is used for forage production and dry cow-heifer pasture. This is very high quality land with 8.3 hectares of Class 1 to 3 capability on Marble Hill soils, the best in the Fraser Valley and sought after by farmers growing high value crops like raspberries, blueberries and vegetables. The land owners in Deroche are prepared to include a total 25.8 hectares of land into the ALR.

Allowing the sand storage facility to move to the Sanstor site and allowing the truck parking facility would not result in any significant loss of agricultural opportunity because the rented 3.15ha is suffering serious problem from flooding and high water tables during the growing season. The 5.0ha has not been farmed in recent memory. At the end of the 25 year term, the land would be reclaimed to Class 2 improved capability and brought into agricultural production.

C&F LAND RESOURCE CONSULTANTS LTD.

***4383 Happy Valley Road, Victoria, B.C. V9C 3Z3
(250)474-5072; fax:(250)474-5073; Email: cflrc@shaw.ca***

Update of April 20, 2016 Assessment of Land Use, Soils and Agricultural Capability for 14671 Williams Road, Richmond, B.C. as at July 28, 2025

1. INTRODUCTION

1.1 Terms of Reference

In 2015, you asked C&F Land Resource Consultants Ltd. (C&F) to carry out a soil survey and agricultural capability assessment and prepare a technical report on the property owned by Sanstor Farms Ltd. (Sanstor) legally described as: SOUTH HALF OF THE SOUTH EAST QUARTER SECTION 28 BLOCK 4 NORTH RANGE 5 WEST EXCEPT: SOUTH 33 FEET, NEW WESTMINSTER DISTRICT; PID: 003-464-504; civic address: 14671 Williams Road; +/-8.35 hectares. The purpose of this report was to support an application to the Agricultural Land Commission (ALC) to use the eastern +/- 5.0 hectares portion of the property for storage and processing of sand dredged from the Fraser River south arm.

The property is wholly located within the Agricultural Land Reserve (ALR) and any non-farm use is prohibited unless an approval from the ALC is secured to allow that use. Storage and processing of sand and commercial truck parking are proposed for this site and these are non-farm uses which would require an application under Section 25.1 of the ALC Act. An application made under Section 25.1 must be considered by the local government, City of Richmond (Richmond) and endorsed by a resolution of Council prior to it being considered by the ALC. The local government may refuse to endorse the application and this ends the application.

Sanstor intends to make a new application to Richmond and the ALC and this updated Report addresses any changes which have occurred in the intervening ten years.

1.2 History of Application

An application for a non-farm use to accommodate the non-farm use was submitted to the ALC and Richmond in 2016. The application was considered by Richmond and forwarded to the ALC for its consideration. Upon consideration by the South Coast Panel of the ALC, the non-farm use was approved with conditions. Subsequently, the ALC Chair, citing Section 33.1(1), decided to require reconsideration of the approval by the Executive Committee of the ALC which decided to reverse the Panel decision and refuse the application. A request for reconsideration under Section 33(1) was refused by the ALC.

1.3 **Current Situation**

Sanstor wishes to make a new application in support of a non-farm use to accommodate the sand storage facility on the eastern 5.0 hectares of the property and commercial truck parking on the western 3.15 hectares. Sanstor has asked that we review our April 20, 2016 report and describe any changes which may have occurred in the intervening eight years and note any changes which may be required to bring the report up to date. We have reviewed the 2016 report and found some changes which needed to be addressed but found that in the main, few significant technical changes needed to be made. However additional and new information has been developed in the interim period as follows:

- a) in 2017, C&F prepared an extensive review of possible sites in Richmond outside the ALR that might be used as an alternative to the Williams Road site for sand storage. C&F has reviewed this report and found that it is still relevant; details are discussed in Section 7.2;
- b) the western +/-3.15 hectares is rented to a local farmer who is growing ethnic vegetables. The annual rent is \$4,000.00/year or \$1,270/hectare. Sanstor provides a 50HP 4 wheel drive tractor and loader at no cost and Sanstor is responsible for repairs and pulling the farmer out of the muck, on a regular basis, when he gets stuck. The farmer suffers regular crop loss due to flooding during the growing season;
- c) a re-evaluation of the feasibility of carrying out agricultural capability improvements has been made based on observation of the field conditions over the intervening 10 years;
- d) the eastern wooded area of invasive European Birch had been cleared and the trees windrowed; the land is lying fallow due to severe soil and drainage limitations;
- e) a letter to Bruce Mathers from Tom Corse, Vice President, Real Estate, Vancouver Fraser Port Authority outlined the critical need for a dredge sand storage site near Williams Road upstream of the Massey Tunnel. This has been provided for decades by the Mathers site on Ecowaste land which will cease in 2026. Dredging the river is important to maintain safe passage for Mariners on the river;
- f) Sanstor has been asked by several City of Richmond councillors to consider making the western 3.15 hectares available for development of a legal commercial truck parking facility;
- g) an offer to include 12.2 hectares of land into the ALR in Deroche, B.C. to offset any loss of agricultural opportunity resulting from the temporary sand storage and truck parking non-farm uses has been added to the application and is described in Section 8.

1.4 **Qualifications and Field Protocols**

A soils on site inspection of the subject lands and a review of surrounding lands was carried out on July 9, 2015 and this report summarizes the findings. The fieldwork and reporting was carried out by Brian M. French, P.Ag. an agricultural soil specialist with 46 years of professional experience and fully qualified to carry out soil survey and land capability classification. A resume of experience is included as Appendix A.

This report has been prepared under procedures and guidelines of the following documents: Canadian System for Soil Classification, Publication 1646 (1998)¹; Soil Inventory Methods for British Columbia 1995²; the Land Capability Classification for Agriculture in British Columbia, M.O.E. Manual 1 (April 1983)³; Criteria for Agricultural Capability Assessments, ALC Policy P-10⁴; and Expert Opinion in Agricultural land Commission Matters⁵.

Soil conditions were determined by exposing a series of test pits using a mini-excavator equipped with a clean-out bucket. The pits were exposed to a depth which penetrated the unweathered parent material. A total of six test pits were exposed on the subject property.

This report has ten sections: Introduction, Location and Land Use, Soils, Agricultural Capability, Agricultural Suitability, Proposed Non-farm Use, Alternative Sites in Richmond Not in ALR, Inclusion of Land Into ALR, Impact Analysis and Summary of Findings.

2. **LOCATION AND LAND USE**

2.1 **Subject Property** (See Figure 2.1, 1:10,000 scale Air Photo)

The subject property located at 14671 Williams Road is +/-8.35 hectares in area.

2.2 **Zoning**

The Richmond zoning is AG1, Agriculture. The OCP designation is Agricultural. The land is completely within the ALR as shown on Figure 2.2.

2.3 **Surrounding Land Use** (See Figure 2.3: 1:5,000 scale air photo)

North: Radio towers and grounding field, in the ALR;

East: Ecowaste Industries inert industrial landfill, YVR fuel storage depot and E. Mathers Bulldozing sand storage; all out of the ALR and slated for industrial development;

South: Plastic greenhouses to the southwest, in the ALR and industrial land out of the ALR to the southeast;

Figure 2.1: 1:10,000 scale air photo



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City Hall



Fire Stations



Ambulance Stations



Electric Vehicle Charging Stations



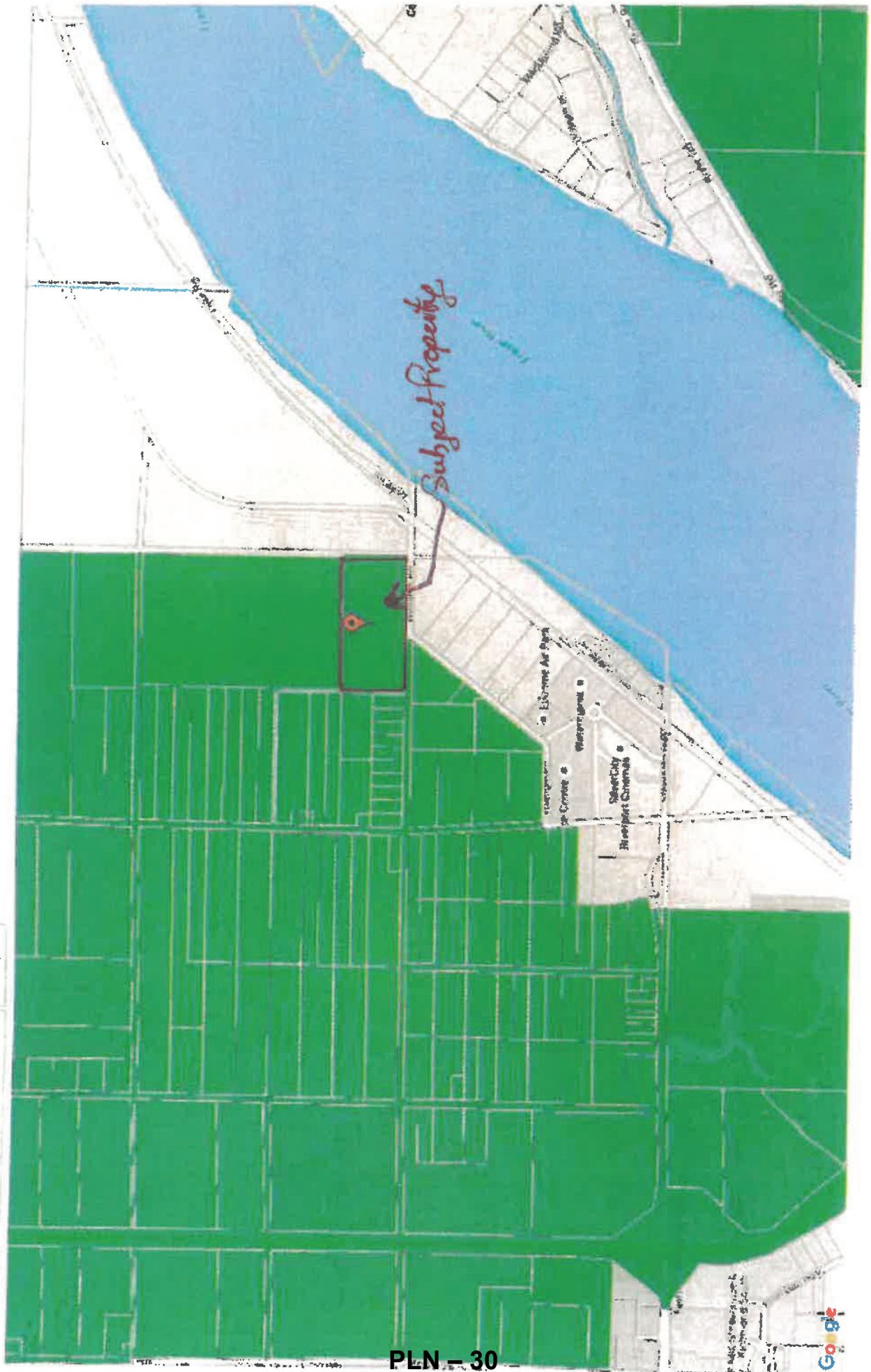
Police Stations



Hospitals



Figure 2.2: ALR Map



Richmond Interactive Map (RIM)

Figure 2.3: 1:5,000 scale Surrounding Land Use



West: Market garden and blueberries, in the ALR.

2.4 **Subject Property Land Use** (see Figure 2.4: 1:2,000 scale air photo)

The western portion of the property occupying some 3.15 hectares; which was lying fallow in 2016; has been rented by Sanstor to a vegetable farmer who is growing specialty ethnic vegetables for the local market. Sanstor has carried out some drainage and grading improvements on this area to accommodate this farm use. However the farmer still faces serious management issues with the land including poor drainage and poor soil strength leading to tractors getting stuck on a regular basis. The farmer must hill all the growing rows to try to get better drainage for his crops and reduce root rot. The farmer suffered a loss of some 25% of his crop this spring when the No. 6 Road pump failed and the land was flooded, killing the crop.

The eastern remainder of the property has been cleared of the diseased, invasive European Birch trees and these have been windrowed on the site. An Arborist Report by Arbortech Consulting (Appendix B) was commissioned to assess the condition of the Birch trees and they were determined to be seriously impacted by disease, dying and at risk of falling. This area remains fallow. A 5.0 hectare area in the east is proposed for relocation of the sand storage facility. A 3.15 hectare area in the west is proposed to be developed for commercial truck parking. Figure 2.4 is an air photo from the Richmond map site.

3. **SOILS**

3.1 **Ministry of Environment 1:25,000 Mapping** (see Figure 3.1)

The Ministry of Environment Soils of the Langley-Vancouver Map Area, RAB Bulletin 18⁶ at 1:25,000 scale maps the property as a complex of Richmond and Annis Series. Volume 3 of RAB Bulletin 18⁷ describes Richmond soils as being developed from 40 to 160cm of mainly well decomposed organic material overlying moderately fine and medium textured deltaic deposits. Richmond soils are very poorly drained. Agriculturally Richmond soils are limited by mainly high water tables and very acid soil conditions. The underlying subsoils are saline. Liming and subsoil drainage can be employed to reduce acidity and improve drainage. However, a lack of regional drainage infrastructure to control ditch water levels prevent any on site drainage improvements from working.

Annis soils are described in Volume 3 of the RAB Bulletin 18⁷ as being developed from shallow organic accumulations between 15 and 40cm thick overlying moderately fine to fine textured Fraser River floodplain deposits. Annis soils are poorly to very poorly drained. Poor drainage and heavy subsoil textures limit the usefulness of Annis soils for agriculture. Artificial drainage would widen the range of suitable crops. However, a lack of regional drainage infrastructure to control ditch water levels prevent any on site drainage improvements from working.

Figure 2.4: 1:2,000 scale Air Photo of property



PLN - 33

100ft
30m

-123.059 49.143 Degrees



3.2 **Current On Site Inspection (Figure 3.2)**

Six soil pits were excavated with a mini-excavator. Detailed on site inspection and survey at 1:2,000 scale identified two soil units and one anthropic unit on the property. Field notes are included in Appendix C. Laboratory soil test results from Exova are included in Appendix D. Photographs of the soil pits and associated landscapes are included in Appendix E.

3.2.1 **Soil Unit I**

Unit I occupied +/-5.8ha or 70% of the subject area and was the dominant soil unit identified on the subject property and was located on the eastern portion of the property. Unit I was developed from shallow poorly to moderately well decomposed organic peat overlying silty clay and silty clay loam subsoil. The depth of organic surface layer varied from 25 to 40cm in depth. The pH was very low and ranged from 3.8 to 4.0. The electrical conductivity was moderately high, 2.5 to 3.24dS/m, indicating a high salt content. The sulphur content was very high and could be toxic to some plants. The topography was near level to very gently undulating. The vegetation was mostly deciduous brush with some area cleared on the western edge. The vegetation boundary generally followed the soil boundary. This Unit was characteristic of the Annis Series.

A typical soil profile was exposed at Soil Pit # 6 and was described as follows:

OF-M	35 - 0cm	dark reddish brown (5YR3/3, moist) fibric to mesic organic; near massive structure; common roots; clear boundary to:
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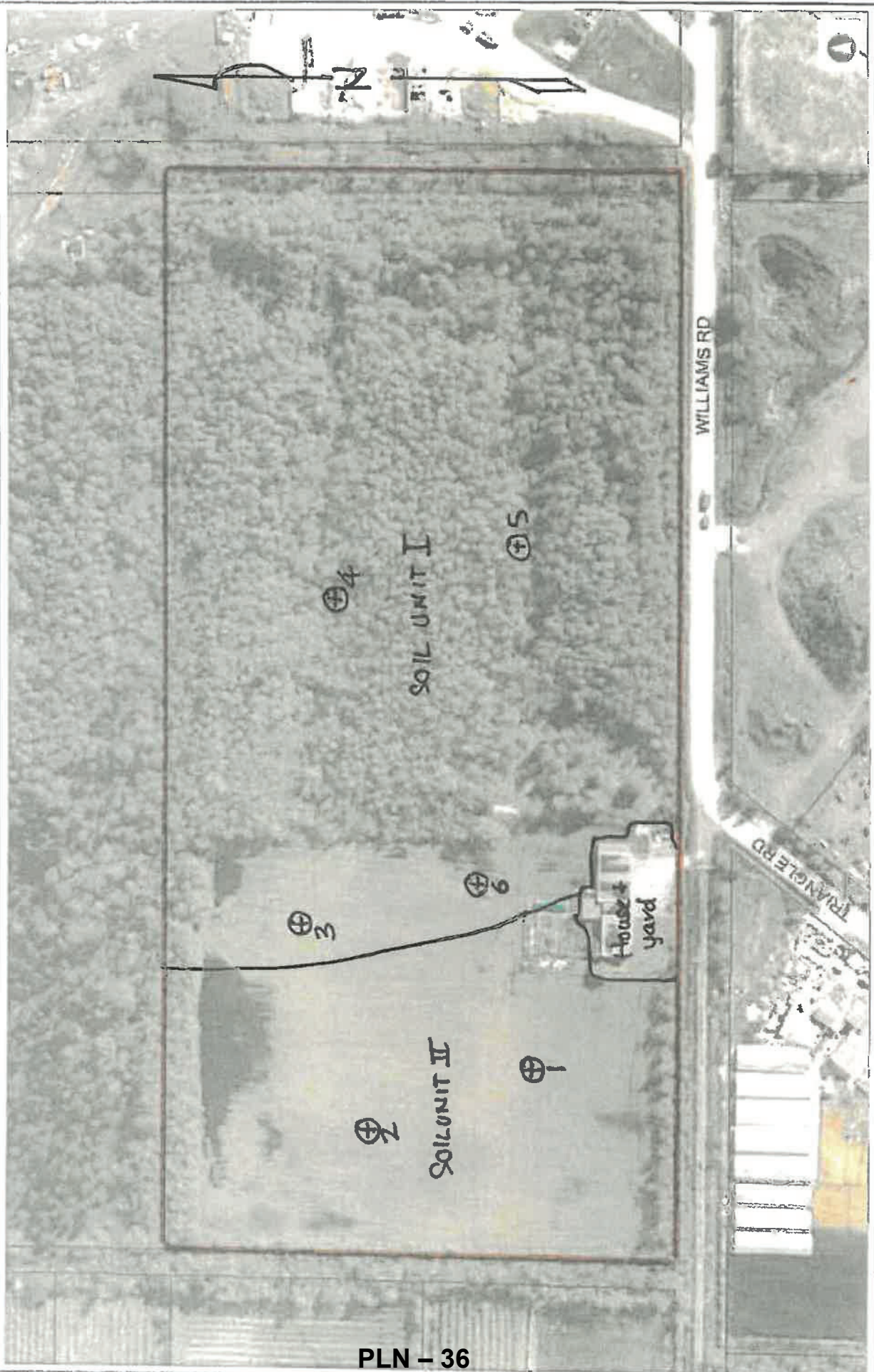
Cg	0 - 10cm	grey (5YR5/1, dry) silty clay loam; massive; no roots.
----	----------	--

3.2.2 **Soil Unit II**

Unit II occupied +/-2.93ha or 28% of the subject area and was found on the western, cleared portion of the property. Unit II was developed from moderately well decomposed organic peat overlying silty clay loam subsoil. Two organic horizons were identified, the surface horizon was friable and well decomposed while the underlying organic layer was massive and moderately well decomposed. The surface layer had a near neutral pH of 6.6 while the underlying organic layer had a very acid pH of 3.1. The electrical conductivity was toxic in the lower organic soil at 9.66dS/m. Also, the Sulphur content in this lower layer was very high at greater than 1000mg/kg. The low pH, high E.C. and very high Sulphur content would render this soil toxic to most crops. There is a large depressional area in the centre-north of this unit which would be subject to flooding for extended periods of the year. Despite having subsurface drain lines installed at 50 foot intervals, the drains are ineffective during the critical spring and fall periods due to high ditch water

Figure 3.2: Current 1:2,000 scale On Site Soils Map

City of Richmond Interactive Map



PLN - 36

levels which flood the drain lines.

A typical soil profile was exposed at Pit #1 and was described as follows:

OM	80 - 50cm	dark reddish brown (5YR3/3, moist) mesic organic; weak granular structure; friable; common roots; clear boundary to:
OF	50 - 0cm	dark brown (7.5YR3/3, wet) fibric peat; massive amorphous structure; saturated; no roots; fairly clear boundary to:
Cg	0 - 10cm+	grey (5YR5/1 moist) silty clay loam, massive, soft and wet; no roots.

3.2.3 Soil Unit III

Unit III occupied 0.2ha or 2% of the property and was the house and curtilage area.

3.3 Comparison of MOE and Current Soil Mapping

On the 1:25,000 scale MOE mapping, the entire property is mapped as a complex of Richmond and Annis series. In the current detailed 1:2,000 scale mapping, evidence of both these soils were found but there was a clear distinction between the two soil types with soil more characteristic of the Annis Series on the east and Richmond Series on the west. Comparison at the 12.5 times scale difference is not expected to show good conformance.

4. AGRICULTURAL CAPABILITY

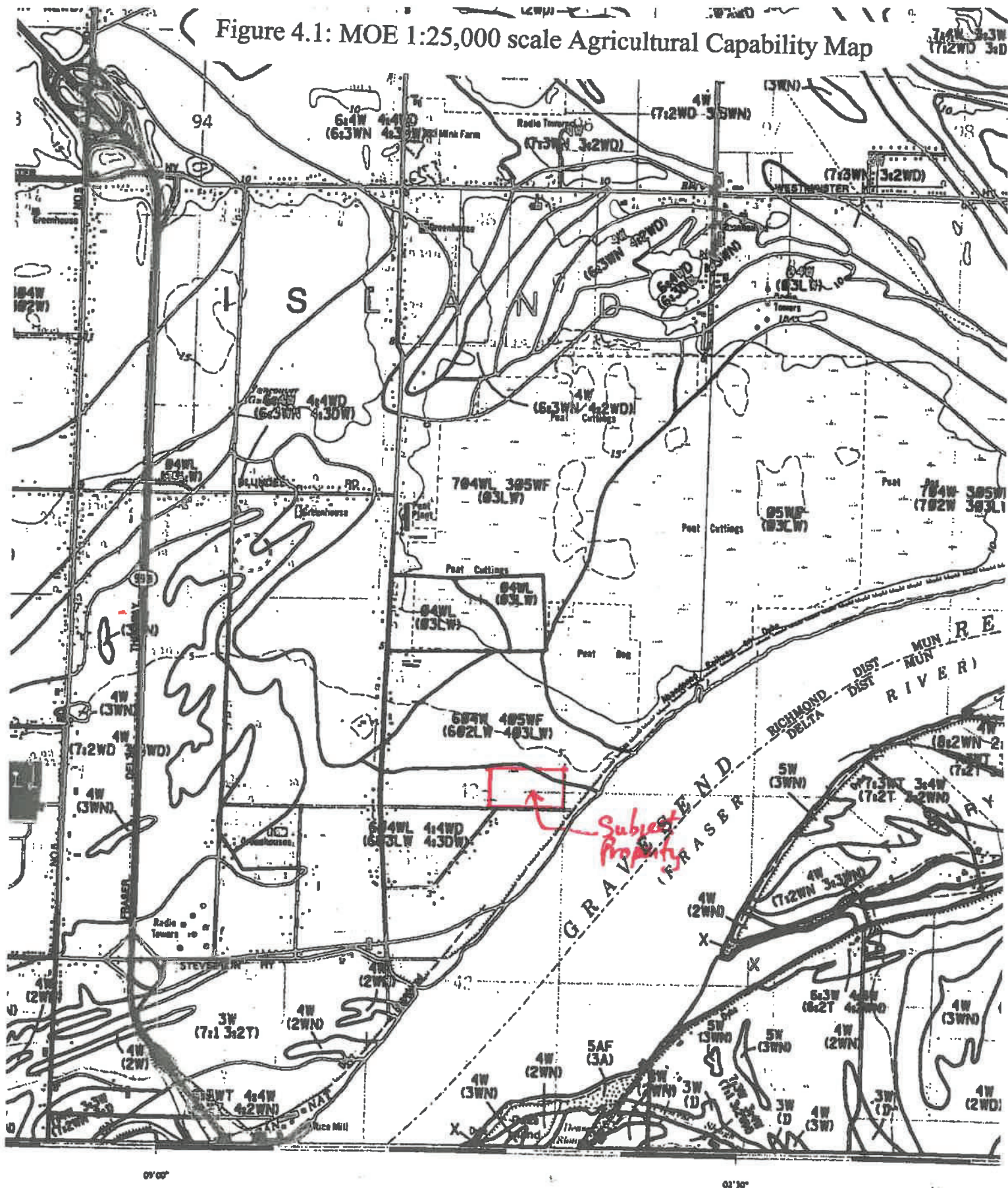
4.1 Ministry of Environment Mapping (Figure 4.1)

The MOE 1:25,000 scale mapping⁸ for agricultural capability rated the property as a complex of 60%O4WL - 40%4WD, improvable with drainage and irrigation to 60%O3LW - 40%3DW.

4.2 Detailed On Site Interpretation (Figure 4.2)

Unimproved and improved agricultural capability ratings were applied to the soil units identified on the property. Landscape and climate factors were integrated into the ratings. The Ministry of Environment Land Capability Classification for Agriculture in British Columbia (MOE Manual 1)² was used to assign ratings. Excerpts of MOE Manual 1 are included in Appendix F.

744W 323W
1712WD 32D



PLN – 38

NEW WESTMINSTER DISTRICT

Richmond Interactive Map (RIM)

Figure 4.2: Current 1:2,000 scale Agricultural Capability Map

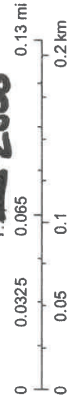


PLN - 39

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- Air Parcels
- Strata
- Parcels (black line)
- City Hall
- Electric Vehicle Charging Stations
- Fire Stations
- Police Stations
- Ambulance Stations
- Hospitals

1:2,000



4.2.1 Unit I

Soil Unit I was limited by very poor drainage, low pH and moderately high E.C. The shallow organic surface horizon was underlain by a dense silty clay loam mineral horizon which creates a strong lithologic and hydraulic discontinuity. Most of this unit was covered with invasive European Birch deciduous forest vegetation until 2020 when it was cleared and grubbed. Under cultivation the organic material tends to quickly oxidize and disappear from the soil profile leaving a raw, poorly structured mineral soil unfavorable for crops. These soils are difficult to drain effectively and suffer from high water tables and flooding well into the growing season due to restricted drainage invert.

An unimproved agricultural capability rating of Class 5WDF was applied and limited theoretical improvement could be achieved with subsurface drainage and successive lime applications to Class 4DW. However after observing this site for the last 10 years, I have concluded that the frequent flooding and high water tables experienced during the growing season render any drainage improvements ineffective because the cause of the flooding and high water tables is due to off site influences. Therefore I have amended my original classification; which anticipated drainage improvement to the Class 4 level; to the unimprovable Class 5WDF capability.

4.2.2 Unit II

Unit II was limited by very poor drainage, especially in the depressional area, despite being fitted with subsurface drain lines on 50 foot spacing. The drain lines lack adequate invert due to high ditch water elevations in the spring, winter and fall and are effectively inoperative. The cultivated surface horizon had fairly good structure but the underlying organic soil was massive. The organic subsoil had a very low pH, very high E.C. and very high Sulphur content. Any deep rooted crop would suffer serious damage if it penetrated this horizon. An unimproved agricultural capability rating of Class O5WFN was applied to this unit. While subsurface drainage improved with closer spacing, successive applications of lime and excessive irrigation to flush out the Sulphur, this unit could be improved theoretically over several years to Class O4NFW. However after observing this site for the last 10 years, I have concluded that the frequent flooding and high water tables experienced during the growing season render any drainage improvements ineffective because the cause of the flooding and high water tables is due to off site influences. Therefore I have amended my original classification; which anticipated drainage improvement to the Class 4 level; to the unimprovable Class 5WDF capability.

4.2.3 Unit III

Unit III occupied the dwelling, yard and outbuildings on the property and were rated "A" anthropic as disturbed by the activities of man rendering it unsuitable for soil bound

agriculture.

4.3 Summary of Agricultural Capability

The agricultural capability of the property is summarized in the Table below.

AG. CAP. CLASS	UNIMPR. AG. CAP. (HA)	% OF AREA	IMPROVED AG. CAP (HA)	% OF AREA
1	0	0	0	0
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	8.1	98	8.1	98
7	0	0	0	0
Anthropic	0.2	2	0.2	2
TOTAL	8.3	100	8.3	100.0

4.4 Comparison of MOE and Current Ratings

The current ratings are significantly lower than those applied by the MOE mapping. A harsher rating has been applied to the soils on the subject property because of the difficult management issues related to the shallow organic layer overlying dense, unweathered silty clay subsoil on Unit I and the serious external drainage issues associated with both units. This property is at the end of the municipal drainage system and suffers from limited invert, high water table and periodic flooding in the growing season. The current survey lowers the unimproved and improved classes by two levels over the MOE ratings to account for these on site limitations. These limitations are beyond the control of the property owner due to external influences and make on site improvements ineffective thus limiting the capability to the unimproved rating of Class 5.

5. AGRICULTURAL SUITABILITY

Agricultural suitability is a further interpretation of agricultural potential based on soil, crop, climate and productivity limitations for the site and the area. While agricultural capability is an abstract classification indicating the range of crops which could be grown, agricultural suitability more closely represents the practical commercial options for agricultural use of the land. It has been assumed in making these suitability interpretations

that the improvements as required to achieve the improved agricultural capability ratings would be in place. Soil bound uses are discussed for each capability unit. Non-soil bound uses are discussed in general terms.

5.1 Soil Bound Agricultural Uses

The shallow organic layer overlying dense, unweathered clay on Unit I would present significant management challenges for growing annual crops. Long term fertility amendments and drainage improvements would be required to bring these soils up to an acceptable standard for a narrow range of crops but external drainage issues which cause flooding during the growing season severely limit the feasibility of growing annual crops. Perennial berry crops would be limited to Blueberries but the shallow organic layer and dissimilar unweathered underlying mineral soil would create rooting limitations. Field crops such as corn or cereals would be unsuited to this unit due to spring and fall risk of wet soil conditions and flooding which would delay planting and harvesting and risk crop loss.

In terms of soil bound crops, Unit II on the subject property has low suitability for shallow rooted crops even those with moderate to high tolerance for wetness. Leafy vegetables and blueberries are grown on the lands to the west of the subject property with soils similar to Unit II but appear to have better drainage access. Deeper rooted annual or perennial crops would be severely limited by the underlying soil condition and high water table.

Forage based agriculture in support of livestock depends on growing forages, field corn and cereals to feed the animals. Forages could be grown on the subject parcel but the wet soil conditions would be unsuitable for corn and cereals. Pasturing livestock on wet soils has the potential for foot disease issues, particularly with sheep and cattle. The suitability for forage production is low since these organic soils are susceptible to invasion by undesirable weeds and rushes in forage and planting and harvesting annual field crops is limited by the wet soil conditions in the spring and fall.

5.2 Non Soil Bound Agricultural Uses

Non soil bound uses include greenhouses, mushroom production, feedlot and pot nursery. The primary limitation on the subject property to these uses is the organic soils which have a very low load bearing capacity for buildings. Any of these uses would require stabilization of the organic soils and preload fill to raise the grade above the flood elevation in order to provide a suitable building foundation. It would be unusual to find this kind of development on organic soils for this reason. Plastic hoop cold frame greenhouses are common on these soils and are considered suitable for this site but the recurring flooding would require raising the grade. This site is considered unsuitable for

most non-soil bound uses.

6. **PROPOSED NON-FARM USE OF LAND**

6.1 **Background**

Mathers Bulldozing, a long standing Richmond business, provides an important service to the agricultural community in Richmond and Delta by providing clean, salt free Fraser River sand to Cranberry growers, West Coast Instant Lawns turf farm and other farmers in need of sand. While pre-load sand is commonly available from building sites, this sand is often contaminated with foreign materials which are harmful in agricultural applications such as topdressing. Mathers is the major supplier of agricultural quality sand in Richmond and Delta and has a long time relationship with the local farm community.

Mathers has received a number of letters from agricultural and golf course customers with land in the ALR who depend on the high quality sand supplied by Mathers Bulldozing. These letters are found in Appendix G.

6.2 **Proposed Non-Farm Development** Figure 6.2: 1:2,000 scale Map of Proposed NFU

6.2.1 **Sand Storage Facility**

Sanstor would require approximately 5.0 hectares of land for their sand storage operation. The sand storage footprint would be limited to the eastern, recently cleared area of the property and the existing house and curtilage which would be used for equipment storage and an office.

The area proposed for the non-farm use for sand storage would be serially filled with dredged sand on a schedule to satisfy the navigation requirements on the Fraser River and then sold. The minimal infrastructure to be installed would include an access, scale and scale house in the SW corner, a non-permanent fabric roof equipment shed located on the current paved area near the house and use of the existing dwelling as an office. The dredging infrastructure, composed of buried and surface input pipe and drainage water conduit, are already installed along the western boundary of the existing Mathers site and would be reconfigured to fit the new site.

6.2.2 **Commercial Truck Parking Facility**

The City of Richmond is facing a serious problem with illegal truck parking on ALR land due to a lack of legal commercial truck parking facilities. The western 3.15 hectares are proposed for development of a commercial truck parking facility. The Sanstor site is

Richmond Interactive Map (RIM)

Figure 6.2: 1:2,000 scale showing Proposed Uses



PLN - 44

7/29/2025, 10:33:14 AM

- Air Parcels
- Strata
- Parcels (black line)
- City Hall
- Fire Stations
- Police Stations
- Ambulance Stations
- Hospitals
- Electric Vehicle Charging Stations

1:2,000
0 0.0325 0.065 0.1 0.13 mi
0 0.05 0.1 0.2 km

centrally located close to major transportation corridors and is on a heavily used truck route. Having a legal, well managed truck parking facility would provide space for approximately 130 trucks on an established truck route and eliminate a major reason provided by truck owners for illegally parking in the ALR. Sanstor would not operate the truck parking facility but would lease it to a qualified operator or the City of Richmond for \$1.00/year and payment of property taxes.

One metre of dredged sand would be placed on this area which would be capped with 300mm of road base gravel. Drainage control would be installed to isolate and treat any runoff from the truck parking area.

6.2.3 Savage Road Right of Way

A 0.20 hectare area along the eastern boundary is proposed for widening of the Savage Road Right of Way. This RoW application is being made under separate application by Ecowaste Industries. The RoW would be dedicated to the City of Richmond.

6.3 Reclamation When Site Decommissioned at End of Tenure

When the temporary sand storage and truck parking uses end after the 25 year term, or in the unlikely event of Sanstor quitting the site, it will be reclaimed for agricultural use. Reclamation would entail:

- a) retention of +/-100,000m³ of sand to be used in reclamation of the sand storage site;
- b) retention and stockpiling of +/-35,000m³ of sand to be used in reclamation of the truck parking site;
- b) removal of infrastructure including scales, roads and other facilities on sand storage area; removal of road base and surface drainage system on truck parking site;
- d) grade the retained sand two meters deep on the sand storage area with a target finished elevation of +/-1.0 metres geodetic;
- e) place 1.0m of sand on existing sand base layer on truck parking site to a target finished elevation of +/-1.0m geodetic;
- e) import Class A compost onto the surface of the reclaimed sand area to provide a placed depth of at least 300mm and cultivate into the sand layer to a depth of 600mm;
- f) Install a subsurface drainage system designed by an Agrologist qualified in agricultural drainage on the entire disturbed area;
- g) manage fertility as required to bring the site up to an acceptable agricultural standard for a range of crops;
- h) If a perennial crop is not planted in the first year; establish a forage crop with a high level of management including harvesting and recording forage yields;

- i) secure a suitable source of irrigation water either from municipal water supply or ditch water having low salt content.

The final reclaimed agricultural capability would be Class 2A with the required irrigation and drainage improvements in place. This reclaimed land would be highly suited for root crops, leafy vegetables, berries and field crops.

The estimated cost to carry out the decommissioning and reclamation of the sand storage site in case of closure is as follows:

RECLAMATION COSTS

ACTIVITY	DETAILS	COST
REMOVE INFRASTRUCTURE	REMOVE BUILDINGS, SCALE, ROADS, TRUCK PARKING CAPPING, SURFACE DRAINAGE SYSTEM	100,000
PLACE SAND ON STRIPPED TRUCK PARKING BASE	35000M3 X \$3.00/M3	105,000
REPLACE STOCKPILED SAND	100,000M3 @ 0.50/M3	50,000
SUPPLY & PLACE COMPOST ON SAND SURFACE	83,000M2 X 0.3M = 25,000M3 @ \$15.00/M3 IN PLACE	375,000
DRAINAGE, IRRIGATION, CULTIVATION & SEEDING	83,000/M2 @ \$1.00/M2	83,000
MONITORING AND SUPERVISION	DURING DECOMMISSIONING AND RECLAMATION	50,000
ESTIMATED TOTAL RECLAMATION COST		763,000

Therefore the total estimated cost to reclaim the sand storage site to an acceptable agricultural condition at the end of the term of if the uses were to cease is \$763,000. Bonding to secure this eventuality in the amount of \$850,000; which includes a contingency amount of \$87,000; would ensure that the site would be returned to productive agriculture at the Class 2 level of capability.

7. **ALTERNATIVE SAND STORAGE SITES IN RICHMOND NOT IN ALR**

7.1 **Richardson Review**

Mathers retained the services of Bruce Richardson, Vice President Industrial Properties at

CBRE Commercial Real Estate company, to try to find a suitable relocation site for Mathers Bulldozing. Richardson had been looking for a site for five years and he summarizes his efforts in a letter dated November 17, 2015 and concluded that there were no suitable alternative sites available. This letter is included in Appendix H.

7.2 C&F Alternative Sites Review

C&F prepared a report dated August 30, 2017 entitled “ALC Application #55285 - Sanstor Farms Supplementary Information in response to City of Richmond Staff Report” which addressed the misinformation contained in the Staff Report regarding the availability of alternative sites in Richmond where the sand storage facility could be located outside the ALR. This Report is attached as Appendix I. We carried out a detailed review of all the sites proposed in the staff report using aerial photographs and visual ground survey. We concluded, after reviewing every site identified in the staff report, and other sites with foreshore access on the perimeter of Richmond, that none of these sites were suitable for the sand storage facility for a number of reasons including: site was built out with warehouses or other permanent fixtures, site was a municipal park, site was a marina, site was B.C. Ferries repair facility, lack of access to the Fraser River, site used for new car storage, Ecowaste lands are being converted to light industrial use, North Arm Fraser River is not suitable due to silty material, Mitchell Island is completely built out.

7.3 Vancouver Fraser Port Authority Letter

Mr. Tom Corsie, PPM, Vice President, Real Estate for the Vancouver Fraser Port Authority provided a letter dated April 26, 2019 (Appendix J) in support of the Sanstor site for replacing the current Mather’s site on the adjacent Ecowaste lands. He states that the maintenance of the navigation channel on the South Arm of the Fraser River by the Vancouver Fraser Port Authority is critical to ensure the safe navigation for mariners using the south arm of Fraser River and which also provides positive effects to regional flood control. He goes on to state that the cost of dredging the Fraser River is significant and a portion of cost recovery is obtained through the sale of river sand at various sand sales or sand depots operated by companies that either offer sand and gravel sales, or other site preparation services. One of the more strategic locations for dredge sand storage is the Williams Road area where Mathers has operated for many decades.

If the Mathers site on the Ecowaste land is not available, or an alternative site close by is not available, the dredged sand would probably need to be ocean dumped. This is not only more expensive, it wastes an important resource critical to development of infrastructure in the lower mainland region for sand preload of roads, highways and building sites as well as being an economical sand source for agricultural users. Sand from alternative sources would need to come by truck from Abbotsford or by barge from

the Sunshine Coast at significant additional cost.

The current Mathers sand storage facility is incompatible with the proposed light industrial land use on the Ecowaste lands and there is no possibility that Ecowaste would extend the current use beyond 2026. We have carried out a detailed search for alternative sites in Richmond (Appendix H) and determined that the Sanstor Williams Road site is the only available and suitable site for this facility in Richmond.

8. **INCLUSION OF LAND INTO THE ALR**

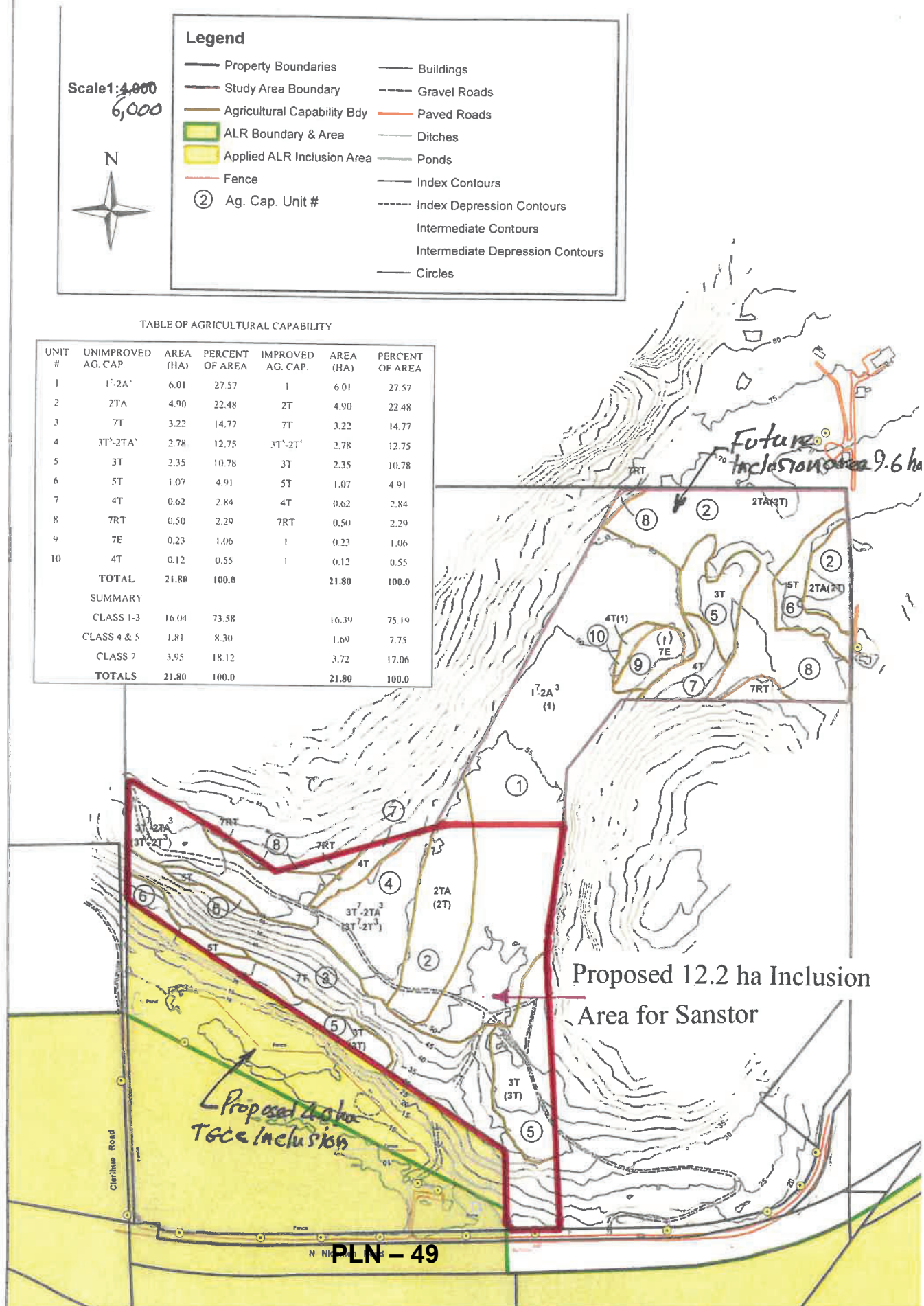
Sanstor has an agreement with David Vernon, the agent for the owners of a large, 68 hectare farm property in Deroche, B.C., to include into the ALR a 12.2 hectare portion of that property. This land is currently out of the ALR and has high agricultural capability. The proposed Inclusion Area of 12.2 hectares is made up of 8.3 hectares of Prime Class 1 to 3 land, 0.7 hectares of secondary Class 4 and 5 land and 3.2 hectares of Class 7 slope acting as a buffer to adjacent non-ALR land and to provide continuity to the ALR boundary. Considering only the 8.3 hectares of prime Class 1 to 3 land proposed for inclusion compared to the 8.3 hectares of secondary Class 5/4 land proposed for temporary sand storage and truck parking non-farm uses, the ratio of inclusion to non-farm use would be 1:1. Overall, the ratio of inclusion to exclusion would be 1.5:1. However, the land proposed for temporary non-farm use is low agricultural capability, Class 5 with serious drainage issues, while the proposed inclusion land is primarily Class 1 to 3 and suitable for all crops with minimal management limitations.

The intent of the land owner is to include a total of 25.8 hectares of land into the ALR under three separate applications of which this is one. Of the total area proposed for inclusion, 18.4 hectares (45.5 acres) are Class 1 to 3 improved capability.

The proposed inclusion land is an integral part of a large dairy farm located on nearby Nicomen Island and provides summer pasture and hay for replacement heifers and dry cows. These non-ALR areas have been in active agricultural use for at least 80 years as evidenced by the cleared land and a remnant walnut orchard in the NE corner with huge walnut trees up to 100 feet tall. Clearly, early settlers recognized the high agricultural potential of this land and chose to establish a farm there despite its isolated location on a bench some 60 metres above the Fraser River floodplain. A plan of the proposed inclusion area with agricultural capability mapped on it is shown on Figure 8 at 1:6,000 scale.

Sanstor has been advised by David Vernon, the Agent for the land owner, that an inclusion application No. 102004 involving 12.2 hectares for this project was approved for submission to the ALC by the Fraser Valley Regional District Board on July 24, 2025.

Figure 8: 1:6,000 scale Proposed ALR Inclusion in Deroche



Upon securing ALC approval for the Non-Farm Use application, Sanstor will instruct the Agent to proceed with the Inclusion process.

9. **IMPACT ANALYSIS**

9.1 **Impact of Proposed Non-farm Use of Subject Lands on Surrounding Lands**

The western +/-3.15 hectares have been rented to a local farmer who is growing ethnic vegetables. The eastern portion of the property has been cleared but remains fallow. The lands to the east are out of the ALR and slated for industrial development. The property to the north is a long established radio grounding transmission site. Large volumes of truck traffic currently arrive and depart from the Ecowaste site and the Mathers sand depot so little change would occur if the new site is activated. The proposed non-farm use would not have any impact on surrounding agricultural lands not currently existing. A berm would be placed on the west boundary to provide buffering for the agricultural lands to the west. The trees on the undeveloped road RoW along the west property line provides additional buffering.

9.2 **Potential Impact of Non-farm Use for Sand Storage and Processing on Local and Regional Agricultural Productive Capacity**

The western +/-3.15 hectares are rented to a local farmer who is growing ethnic vegetables. The eastern portion has been cleared but is lying fallow due to poor soil conditions. Historically the western 35% of the property was in agricultural production while the eastern 65% was cleared circa 1980 but has not been actively farmed since and reverted to deciduous brush. The farmer leasing the western 3.15 hectares suffers serious crop damage and losses due to flooding and high water tables in spite of improvements carried out by Sandstor. Flooding is beyond the control of the property owner and is due to regional issues. The intent is to have the sand storage and truck parking occupy the site for a period of 25 years. Once this use is de-commissioned, the land would be reclaimed for agricultural use at the Class 2 level of capability.

Mathers is a major supplier of agricultural sand to Cranberry producers and other farmers including West Coast Instant lawns in Delta which uses substantial quantities of sand to amend its turf fields. While some 5.0 hectares of land will be occupied by the sand facility, this land has never been cleared and used for agriculture in recent history. The loss of the agricultural sand source currently provided by Mathers on its Ecowaste site would have a serious impact on farmers who depend on a reliable local source of reasonably priced, clean sand.

The temporary (25 year) non-farm use of this +/-8.3 hectares of land would have little or no impact on local agricultural productive capacity.

The inclusion of 12.2 hectares of land into the ALR in Deroche with 8.3 hectares of Class 1 to 3 capability will provide protection of this important agricultural land resource in perpetuity and prevent its loss by subdivision into 2 hectare residential lots as currently allowed under the local zoning while out of the ALR. Therefore inclusion into the ALR of this prime agricultural land would offer up a significant regional agricultural benefit.

9.3 **Potential of Non-farm Use of the Subject Lands for Impact on Surrounding Agricultural Operations**

The only agricultural uses are located immediately west of the 3.15 hectare farmed area on the subject property and a small plastic greenhouse operation to the south of the fallow field.

9.4 **Precedent for This Non-farm Use Triggering Future Applications**

The Mathers sand operation is quite unique, and like most other river sand deposit sites along the Fraser River, they have been established for many years to service the critical Fraser River channel dredging needs. It is only because of the loss of the longstanding lease on the Ecowaste lands that Mathers has been forced to find an alternative site. Otherwise Mathers would never intend to move their operation.

10. **SUMMARY AND CONCLUSIONS**

- 10.1 Some 8.1 hectares or 98% of the 8.35 hectares on the subject lands have a Class 5 unimprovable capability. The area occupied by the dwelling and yard is 0.2 hectares and was rated "A", anthropic, with no soil bound agricultural capability. Effective drainage improvement on this property is severely limited by a lack of drainage invert which results in perennial high water table and periodic flooding during the growing season. Therefore the property is considered unimprovable and the Class 5 rating remains.
- 10.2 Mathers Bulldozing currently operates a dredged river sand depot on lands adjacent to the subject property which are slated for industrial development in the near future resulting in displacement of the Mathers depot. Mathers has canvassed the local area for a suitable non-ALR site without success. Sandstor Farms Ltd. is a wholly owned subsidiary of Mathers Bulldozing.
- 10.3 Mathers provides an important service to the local agricultural community by supplying clean, salt free sand for Cranberry farmers and others including West Coast Instant Lawns/GFL Environmental in Delta. Clean sand, locally sourced at a reasonable price, is a critical component in these operations.

- 10.4 Mathers would like to move its existing operation to the subject property and use the eastern +/-5.0 hectares of the subject property for stockpiling river sand dredged from the Fraser River. This land has not been used for agriculture in recent history. A commercial truck parking facility is proposed for the western 3.15 hectares.
- 10.5 The Vancouver Fraser Port Authority needs a dredge sand storage site which is critical to maintaining the Fraser River shipping channel east of the Massey Tunnel. This has been serviced by the Mathers sand storage site on the Ecowaste land for decades and this lease is terminating in 2026. The Sanstor site on Williams Road would allow continuation of this critical service to maintain the shipping channel in the Fraser River.
- 10.6 Upon expiration of the temporary 25 year Non-farm Use approvals, the land would be reclaimed to a better improved agricultural capability than currently exists, by three classes from Class 5 to Class 2A. The estimated reclamation cost of \$850,000 for the sand storage and truck parking uses would be secured by bonding.
- 10.7 Sanstor is proposing to include 12.2 hectares of land in Deroche, B.C. into the ALR. This land is in active agricultural use and has 8.3 hectares of prime Class 1 to 3 agricultural capability. This land, including the additional proposed inclusion lands totalling 25.8 ha, is currently vulnerable to rural residential subdivision under local zoning which allows 2 hectare lots. If this were to happen, this important and unique agricultural resource would be lost to productive agriculture forever.

C & F LAND RESOURCE CONSULTANTS LTD.

Per: 

Brian M. French, P.Ag.

File:\Sanstor updated report 07-28-2025

*Excerpt of Food Security and Agricultural Advisory Committee Meeting Minutes
July 31, 2025*

Non-Farm Use Application (14671 Williams Road AG25-019652)

James Hnatowich, Policy Planning, introduced the proposal and provided the following comments:

- In 2018, the ALC Executive Committee refused an application for sand storage on the subject site.
- The eastern portion of the site is designated as an Environmentally Sensitive Area (ESA) in the City's Official Community Plan. The City granted an ESA Development Permit exemption for the agricultural uses over the ESA area.
- The proposal is inconsistent with Zoning and the Official Community Plan, which designates this parcel as Agriculture.
- Should Council and ALC approve the proposed non-farm use, a subsequent rezoning would be required and would include consideration of any ESA impacts.

The applicant Brian French, representing Sanstor Farms Ltd., provided a presentation on the application identifying:

- This application is for a sand storage operation on the eastern 5.0 ha of the site, and a truck parking operation on the western 3.15 ha of the site.
- The existing parcel has drainage issues making the parcel difficult to farm.
- The proposal is for a temporary use for 25 years. The parcel will be reclaimed to Class 2A capability at the end of term and will have an \$850,000 bond.
- The sand storage operation would provide sand to customers, including local farmers. The sand operation would be able to provide sand at a lower cost than importing sand from outside of the city.
- The truck parking is being proposed as there is a perceived problem with truck parking on ALR farmland. Providing a legal truck parking facility in Richmond could help resolve illegal truck parking elsewhere.
- The proposal includes adding 12.2 ha of land in Deroche adjacent to the ALR into the ALR. This land has 8.3 ha of Class 1 to 3 capability and 3.9 ha of secondary land.

An FSAAC member inquired if there was a possibility to strengthen the agricultural component of the application.

In response, the applicant provided the following comments:

- The agricultural component of the presentation includes the inclusion of additional lands in Deroche, as well as reclamation of land at the end of the term limit. Efforts were made to locate land in Richmond, however, the search for local land to be included in the ALR was unsuccessful.

An FSAAC member questioned why the land couldn't be improved to provide for a feasible farming operation at this time, instead of having it used for an industrial use.

In response, the applicant provided the following comments:

- It is financially unfeasible to restore the land for a farming operation;
- There are limited parcels with adjacency to the river that could be utilized for a sand storage operation.
- The application will provide sand to farmers to help with their farming operation.

An FSAAC member asked for further clarity on the existing farming operation, and how the land will be reclaimed at the end of term.

In response, the applicant provided the following comments:

- There is an existing farmer farming the land. However, drainage issues make it difficult to effectively farm the land.
- Reclamation will be secured through a bonding amount of \$850,000.
- The reclamation plan would include providing a layer of sand and importing compost to be mixed into the topmost layer, making the parcel suitable for root crops.

An FSAAC member provided comments of support for a local Canadian business and acknowledged the difficulties of farming the subject parcel.

An FSAAC member questioned if this could encourage industrial creep into the ALR.

In response, the applicant provided the following comment:

- The proposal is for a temporary use, and the parcel will continue to remain in the ALR.

An FSAAC member inquired on what would be required for the truck parking.

In response, the applicant provided the following comments:

- A layer of sand and then gravel will be placed on this portion of the parcel.
- Standard infrastructure will be provided included drainage collection.
- Reclamation for this portion of the parcel will be similar to the reclamation for the sand storage, and a consistent elevation will be provided at the end of term.

An FSAAC member inquired as to why a 25-year term limit was chosen.

In response, the applicant provided the following comment:

- A 25-year term limit appeared to be an appropriate time horizon. The applicant wanted to provide a time limit in good faith to demonstrate that the lands will be restored.

The Committee passed the following motion:

That the Food Security and Agricultural Advisory Committee endorse the Non-Farm Use application at 14671 Williams Road.

*Carried
With Abu Jahangir and Mike Bomford opposed*

MAYLAND FARMS LTD.
2611 No. 7 Road
Richmond, B.C. V6V 1R3

August 27, 2015

TO WHOM IT MAY CONCERN:

We, Mayland Farms Ltd., are Cranberry producers in Richmond and sand topdressing is a critical part of our cranberry bog management. We require approximately 3,000 yards of clean, salt-free sand every year.

We have purchased this sand from E. Mathers Bulldozing Co. Ltd. for many years. The sand supplied by Mathers is excellent quality in terms of its particle size, consistency and it is free of salt. The cost of Mathers sand is very reasonable, an important consideration for agricultural producers. We know that there are very limited suppliers of high quality topdressing sand in the Delta - Richmond area and worry that if Mathers is forced out of the area, we will have to import sand from suppliers in Abbotsford at significantly higher cost.

As agricultural producers, we support the application by Mathers to relocate on the property at 14671 Williams Road in Richmond. We believe Mathers provides an important agricultural input to our cranberry operation.

Yours truly,

MAYLAND FARMS LTD.

David May
(Pres)

MAYFAIR LAKES GOLF & COUNTRY CLUB
5460 No. 7 Road
Richmond, B.C. V6V 1R7

August 27, 2015

TO WHOM IT MAY CONCERN:

We, Mayfair Lakes Golf & Country Club, require topdressing sand and sand for green and tee maintenance on a regular basis. We require approximately 3,000 yards of clean, salt-free sand every year.

We have purchased this sand from E. Mathers Bulldozing Co. Ltd. for many years. The sand supplied by Mathers is excellent quality in terms of its particle size, consistency and it is free of salt. The cost of Mathers sand is very reasonable. We know that there are very limited suppliers of high quality topdressing sand in the Delta-Richmond area and worry that if Mathers is forced out of the area, we will have to import sand from suppliers in Abbotsford at significantly higher cost.

We support the application by Mathers to relocate on the property at 14671 Williams Road in Richmond. We believe Mathers provides an important service to golf course operators and agricultural producers in Richmond.

Yours truly,

MAYFAIR LAKES GOLF & COUNTRY CLUB

A handwritten signature in dark ink, appearing to read "Steve May", is written over the printed name of the club.

COLUMBIA CRANBERRY CO. LTD.
4291 No. 7 Road
Richmond, B.C. V6V 1R6

August 27, 2015

TO WHOM IT MAY CONCERN:

We, Columbia Cranberry Co. Ltd., are Cranberry producers in Richmond and Delta and sand topdressing is a critical part of our cranberry bog management. We require approximately 5,000 yards of clean, salt-free sand every year.

We have purchased this sand from E. Mathers Bulldozing Co. Ltd. for many years. The sand supplied by Mathers is excellent quality in terms of its particle size, consistency and it is free of salt. The cost of Mathers sand is very reasonable, an important consideration for agricultural producers. We know that there are very limited suppliers of high quality topdressing sand in the Delta - Richmond area and worry that if Mathers is forced out of the area, we will have to import sand from suppliers in Abbotsford at significantly higher cost.

As agricultural producers, we support the application by Mathers to relocate on the property at 14671 Williams Road in Richmond. We believe Mathers provides an important agricultural input to our cranberry operation.

Yours truly,

COLUMBIA CRANBERRY CO. LTD.

A handwritten signature in dark ink, appearing to read "William W. Savage". The signature is written in a cursive style with a large, stylized initial 'W'.

**COUNTRY MEADOWS GOLF CLUB
SAVAGE CREEK GOLF CLUB
8400 No. 6 Road
Richmond, B.C. V6W 1E3**

August 27, 2015

TO WHOM IT MAY CONCERN:

We, Country Meadows Golf Club and Savage Creek Golf Club, require topdressing sand and sand for green and tee maintenance on a regular basis. We require approximately 4,000 yards of clean, salt-free sand every year.

We have purchased this sand from E. Mathers Bulldozing Co. Ltd. for many years. The sand supplied by Mathers is excellent quality in terms of its particle size, consistency and it is free of salt. The cost of Mathers sand is very reasonable. We know that there are very limited suppliers of high quality topdressing sand in the Delta-Richmond area and worry that if Mathers is forced out of the area, we will have to import sand from suppliers in Abbotsford at significantly higher cost.

We support the application by Mathers to relocate on the property at 14671 Williams Road in Richmond. We believe Mathers provides an important service to golf course operators and agricultural producers in Richmond.

Yours truly,

COUNTRY MEADOWS GOLF CLUB

and SAVAGE CREEK GOLF CLUB

A handwritten signature in black ink, appearing to be a stylized name, possibly "John" or "James", written over a horizontal line.



Westcoast Farms LTD.
Willow Bay Farms LTD.
Willow Bay - a cooper LTD.
Willow Bay Avicore LTD.
C.G.D.G. V. - strong Holdings.

westcoast

INSTANT

LAWNS

Enviro-smart Organics Ltd.
a full cycle company

August 31, 2015

TO WHOM IT MAY CONCERN:

West Coast Instant Lawns has been using E. Mathers Bulldozing Company Ltd. for all our sand requirements since 1996. Over the last 19 years we have made free draining sand turf fields by applying 6 to 12 inches of sand on our soil based fields which allows us to harvest turf during the wet months. Westcoast has been topping up these sand fields approximately every two years.

The reason we use sand from E. Mathers is because we have tested sand from all the other sand suppliers within our logistical area and we have found that Mathers sand is consistent in quality in terms of its particle size and it is free of salts as compared to other suppliers.

Our composting operation consistently uses approximately 100,000 cubic yards of clean, salt free sand from Mathers. This sand helps us meet the strict B.C. Nursery Trades Association specification as required by the landscape industry.

E. Mathers has always given a preferred price to agricultural producers and this is important for farmers to remain competitive.

There is no real alternative for supply of clean, salt free sand in the Delta area and if E. Mathers were to shut down we would be forced to source sand from suppliers in Abbotsford at significantly higher cost.

We at Westcoast Instant Lawns support the application by E. Mathers Bulldozing Company Ltd. to relocate on the property at 14671 Williams Road in Richmond, B.C. Over the years I have talked with other farmers that have benefitted from being able to have a reliable, consistent source of sand for their farm operations in Delta and Richmond.

Yours truly,

West Coast Instant Lawns

Daryl Goodwin, President

4295 - 72nd St. Delta, BC V4K 3N2
Phone: 604.946.0201 Fax: 604.946.0221

1579



Vancouver Fraser Port Authority
100 The Pointe, 999 Canada Place
Vancouver, B.C. Canada V6C 3T4
portvancouver.com

Email: mathersbulldozing@gmail.com

April 26, 2019

Mr. Bruce Mathers
E. Mathers Bulldozing Co. Ltd.
7200 Francis Road
Richmond, BC V6Y 1A2

Dear Mr. Mathers:

RE: Letter of Support

I am writing to express support for the application to the Agricultural Land Commission (ALC) by Mathers Bulldozing Co. Ltd. to use a 15 acre property that it owns on Williams Road in Richmond for sand storage. The Vancouver Fraser Port Authority has a long term contract to perform annual maintenance dredging of the Fraser River main navigation shipping channel. Each year many hundreds of thousands of cubic meters of sand is removed in order to ensure safe navigation for mariners using the south arm of Fraser River which also provides positive effects to regional flood control.

The cost of dredging the Fraser River is significant and a portion of cost recovery is obtained through the sale of river sand at various sand sales or sand depots operated by companies that either offer sand and gravel sales, or other site preparation services. One of the more strategic locations for sand sales is the Williams Road area where Mathers has operated for many decades. As their lease with Eco Waste will likely end in the short to medium term, it is important to find a replacement site in the immediate area.

We agree the Mathers Williams Road property, although classed as ALR land is ideal for this purpose. We understand Mathers is not requesting removal from ALR designation, but is proposing to fill and preload that portion of the site not suitable for agriculture. We also understand appropriate mitigation for the indefinite sand storage use would be provided to that portion of the site which will continue to be farmed. As a portion of the site is unable to support agriculture in its current form, the filling and preloading of that area would also not preclude an agricultural use in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Corsie', with a long horizontal line extending to the right.

Tom Corsie PPM
Vice President, Real Estate