



**Regular Council meeting for Public Hearings  
Monday, June 18, 2018**

Place: Council Chambers  
Richmond City Hall

Present: Mayor Malcolm D. Brodie  
Councillor Chak Au  
Councillor Derek Dang  
Councillor Carol Day (entered at 7:03 p.m.)  
Councillor Ken Johnston  
Councillor Alexa Loo  
Councillor Bill McNulty  
Councillor Linda McPhail  
Councillor Harold Steves

Claudia Jesson, Acting Corporate Officer

Call to Order: Mayor Brodie opened the proceedings at 7:00 p.m.

1. **RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9764  
(RZ 16-754305)**

(Location: 23200 Gilley Road; Applicant: Oris Developments (Hamilton) Corp.)

*Applicant's Comments:*

The applicant was available to respond to queries.

*Written Submissions:*

- (a) Randy Barber, 23200 Gilley Road (Schedule 1)
- (b) Kal Gill, 23200 Gilley Road (Schedule 2)
- (c) Darbara Sandhu, 5520 Smith Drive (Schedule 3)
- (d) Gurnam Kaur Kaila, 126 Viscount Place, New Westminster (Schedule 4)
- (e) Uttam Singh Chane, 208 Campbell Street, New Westminster (Schedule 5)
- (f) Yadeta Meseret, 4300 Thompson Road (Schedule 6)
- (g) Jonathan Oshorne, 5211 Smith Drive (Schedule 7)



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- (h) Rajan Dassan, 23200 Gilley Road (Schedule 8)
- (i) Jas Brar (Schedule 9)

*Submissions from the floor:*

Betty Carr, 4485 Fraserbank Place, expressed concern with regard to (i) traffic in the area as a result of the proposed density, (ii) sufficient parking for the proposed development, (iii) access to the proposed development and its effect on traffic flow, and (iv) the lack of a designated pick-up and drop-off area for the adjacent school.

In response to queries from Council, staff clarified that the proposal complies with the area plan, provides sufficient onsite parking, and that traffic calming measures will be implemented as part of the servicing plan.

*Cllr. Day entered the meeting (7:03 p.m.)*

PH18/6-1

It was moved and seconded

***That Richmond Zoning Bylaw 8500, Amendment Bylaw 9764 be given second and third readings.***

**CARRIED**

**2. RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9855 (RZ 15-694855)**

(Location: 6560, 6600, 6640 and 6700 No. 3 Road; Applicant: Bene Richmond Development Ltd.)

*Applicant's Comments:*

The applicant was available to respond to queries.

*Written Submissions:*

None.

*Submissions from the floor:*

None.

PH18/6-2

It was moved and seconded

***That Richmond Zoning Bylaw 8500, Amendment Bylaw 9855 be given second and third readings.***



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**CARRIED**

Opposed: Cllr. Day

**3. RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9872  
(RZ 17-778834)**

(Location: 10451, 10471 and 10491 No. 2 Road; Applicant: 1076694 B.C. Ltd.)

*Applicant's Comments:*

The applicant was available to respond to queries.

*Written Submissions:*

None.

*Submissions from the floor:*

Luke Cannata, 10526 Kozier Drive, expressed concern with the current retaining wall in place between his property and 10491 No. 2 Road, noting that he has had to repair it as a result of it continuously failing. Mr. Cannata remarked that previous construction at 10491 No. 2 Road caused damage to his home's foundation, and he expressed concern that future construction will further damage his home's foundation. He then stated that with the demolition of the existing home at 10491 No. 2 Road, his backyard is open to No. 2 Road, which is worrisome. Also, Mr. Cannata wished to see the City's unsightly premises bylaw enforced with regard to tall grass on his neighbour's lawn.

In reply to queries from Council, staff noted that they will discuss with the applicant the concerns regarding the retaining wall and installing perimeter fencing during construction and bylaw enforcement of unsightly premises.

PH18/6-3

It was moved and seconded

*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9872 be given second and third readings.*

**CARRIED**



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**4. RICHMOND OFFICIAL COMMUNITY PLAN BYLAWS 9000 AND 7100, AMENDMENT BYLAW 9874 AND RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9875 (RZ 16-754625)**

(Location: 5480 Parkwood Way; Applicant: Brian Ross Motorsports Corp. dba Alfa Maserati of Richmond)

*Applicant's Comments:*

The applicant was available to respond to queries.

*Written Submissions:*

None.

*Submissions from the floor:*

None.

PH18/6-4

It was moved and seconded

*That Official Community Plan Bylaws 9000 and 7100, Amendment Bylaw 9874 be given second and third readings.*

**CARRIED**

PH18/6-5

It was moved and seconded

*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9875 be given second and third readings.*

**CARRIED**

**5. RICHMOND OFFICIAL COMMUNITY PLAN BYLAW 9000, AMENDMENT BYLAW 9864, RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9865**

(Location: City-wide; Applicant: City of Richmond)

*Applicant's Comments:*

Staff was available to respond to queries.

*Written Submissions:*

None.

*Submissions from the floor:*

None.



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PH18/6-6 It was moved and seconded  
*That Official Community Plan Bylaws 9000, Amendment Bylaw 9864 be given second and third readings.*

**CARRIED**

PH18/6-7 It was moved and seconded  
*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9865 be given second and third readings.*

**CARRIED**

PH18/6-8 It was moved and seconded  
*That Official Community Plan Bylaws 9000, Amendment Bylaw 9864 be adopted.*

**CARRIED**

PH18/6-9 It was moved and seconded  
*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9865 be adopted.*

**CARRIED**

**6. RICHMOND OFFICIAL COMMUNITY PLAN BYLAW 9000,  
AMENDMENT BYLAW 9837 AND RICHMOND ZONING BYLAW  
8500, AMENDMENT BYLAW 9838**

(Location: City-wide; Applicant: City of Richmond)

*Applicant's Comments:*

Staff was available to respond to queries.

*Written Submissions:*

None.

*Submissions from the floor:*

None.

PH18/6-10 It was moved and seconded  
*That Official Community Plan Bylaws 9000, Amendment Bylaw 9837 be given second and third readings.*

**CARRIED**



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PH18/6-11 It was moved and seconded  
*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9838 be given  
second and third readings.*

**CARRIED**

PH18/6-12 It was moved and seconded  
*That Official Community Plan Bylaws 9000, Amendment Bylaw 9837 be  
adopted.*

**CARRIED**

PH18/6-13 It was moved and seconded  
*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9838 be adopted.*

**CARRIED**

**7. RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9861**

(Location: City-wide; Applicant: City of Richmond)

*Staff's Comments:*

Barry Konkin, Manager, Policy Planning, provided a brief overview of Bylaw 9861 and spoke to the "fast track" review process for development applications for agricultural buildings and structures with an area of concrete slab larger than 300 m<sup>2</sup>. Mr. Konkin remarked that a "fast track" review would include a concurrent building permit and soil deposit review process, in addition to the staff report process; also, he noted that the fee for such applications would be \$200.

*Written Submissions:*

- (a) Richmond Farmland Owners Association (Schedule 10)
- (b) Barbara Tinson, Chair, Richmond Chamber of Commerce (Schedule 11)
- (c) Richmond Farmland Owners Association (Schedule 12)
- (d) David Ryall, President, Delta Farmers Institute (Schedule 13)
- (e) Carolyn Campbell, Executive Director, Concrete BC (Schedule 14)
- (f) Darrell Zbeetnoff, Director, Zbeetnoff Agro-Environmental Inc. (Schedule 15)



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- (g) Linda English, 13751 Garden City Road, (Schedule 16)
- (h) Robert S. Pringle, Chief Executive Officer, United Flower Growers Co-Operative Association (Schedule 17)
- (i) Stan Vander Waal, President, BC Agriculture Council (Schedule 18)
- (j) Armand VanderMeulen, President, Chair, BC Greenhouse Growers' Association (Schedule 19)

*Submissions from the floor:*

Stephen Easterbrook, Richmond resident and Co-Chair of the Agricultural Advisory Committee (AAC), spoke against the proposed bylaw. He commented on how farming has evolved, noting that greenhouse farming yields significantly higher crops and is necessary in order for farmers to stay competitive with international farmers. Mr. Easterbrook was of the opinion that a restriction on the size of impermeable floor surfaces on farmland would indicate that Richmond is closed for farming. He commented on farming regulatory practices, noting that the lack of impermeable floor surfaces would render complying with food safety and bio-security regulations extremely challenging; also, pest control would be unmanageable. Mr. Easterbrook queried the rationale for the proposed bylaw, and was of the opinion that inadequate research has been conducted and urged Council to make an informed decision and consider all the effects the proposed bylaw may impose on local farmers.

Niti Sharma, 11380 Kingfisher Drive, spoke in favour of Bylaw 9861, noting that it is necessary as a result of the impending legalization of cannabis. She was of the opinion that (i) a barn could easily be repurposed for cannabis production and as it is a closed structure, such activity may be difficult to detect, (ii) large impermeable surfaces on agricultural land do not support soil based agriculture and could cause irreversible damage to the ecology and bio-physical nature of the land, and (iii) large impermeable surfaces on agricultural land may exacerbate the existing drainage issues. Ms. Sharma then stated that the proposed application process would allow Council to thoroughly assess each application and ensure all applications are genuine.



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Todd May, Co-Chair, AAC, referenced the staff memorandum with regard to the AAC's position on Bylaw 9861, noting that the proposed regulations are contrary to all types of agricultural viability, and that concrete slabs and related structures are essential to modern and current agricultural practices. Mr. May remarked that the proposed bylaw was forwarded to the AAC for its review and comments, and cited concern that their expert opinions were not being respected. He then commented on the "fast track" process, noting that a clear and defined process is required. Mr. May queried the 300 m<sup>2</sup> threshold and urged Council to work with the AAC on this figure.

Humraj Kallu, 13051 Blundell Road, distributed a booklet (attached to and forming part of these Minutes as Schedule 20). He was of the opinion that any actions that negatively impact farmers will also negatively impact businesses on agricultural land. He noted that despite the proposed "fast track" process for development variance applications, the process may pose significant financial implications for farmers. Mr. Kallu then cited concern that those directly affected by the proposed bylaw were not consulted.

In response to Council query regarding the requirements for a greenhouse application, staff noted that the most important component would be a completed statutory declaration. Staff further noted that the proposed expedited process would be more efficient as all steps would be done concurrently.

Vincent Quan, non-Richmond resident, spoke in opposition to the proposed bylaw, noting that it will have a negative impact on the future of farming. He was of the opinion that restrictions on buildings on agricultural land will adversely affect the future viability of a farm and in particular its ability to store and produce crops. He noted that the farming industry is evolving and better quality and large quantities of product are needed to meet consumer demands.

John Roston, 12262 Ewen Avenue, spoke in favour of the proposed bylaw as it will introduce regulations on agricultural structures while the provincial government establishes a regulatory framework on cannabis. He was of the opinion that greenhouses could be built on industrial land to preserve farmland.





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Mr. De Beer, representing Prins Greenhouses, spoke on greenhouses and the method in which vegetables are grown within them. He stated that impermeable flooring is integral to greenhouse farming for many reasons, but in particular as it relates to sanitation and irrigation. In addition, Mr. De Beer commented on the advantages of greenhouse farming, highlighting that production is carried out nearly year round, less water and pesticides are utilized, and yields are approximately 10 times higher than with soil-based farming.

John Moonen, West Vancouver, spoke in opposition to the proposed bylaw and read from his submission (attached to and forming part of these Minutes as Schedule 21).

Kirk Miller, former Chair of the Agricultural Land Commission, cautioned Council on the proposed bylaw, noting that an attempt to prevent certain forms of agriculture could be problematic. He spoke of the establishment of the Agricultural Land Reserve, noting that at the time, its intent was to create an industrial zone where agricultural businesses could operate. Mr. Miller then stated that farming requires the use of farm buildings and greenhouses often with impermeable surfaces. He was of the opinion that the proposed bylaw undermines the City's Agricultural Viability Strategy and removes a farmer's right to choose the most appropriate way to farm. Mr. Miller urged Council to abandon the proposed bylaw.

Vincent Li, 6331 Buswell Street and member of the Richmond Farmland Owners Association, spoke against the proposed bylaw and was of the opinion that stakeholders were not adequately consulted on it. Mr. Li wished to see no new regulations for agricultural buildings and greenhouses.

Resident of 16200 Westminster Highway and member of the Richmond Farmland Owners Association spoke against the proposed bylaw. He was of the opinion that large agricultural buildings and greenhouses do not negatively affect soil-based agriculture. He then stated that he wished to see no new regulations for agricultural buildings and greenhouses.

With the aid of a PowerPoint presentation (copy on file, City Clerk's Office), Peter Karakatsoulis, Lyfe Organic, spoke in opposition to the proposed bylaw as he was of the opinion that vertical farming is the future and greenhouses use less water and protect crops from outside contaminants. He then spoke on various greenhouses being constructed, commenting on their economics.



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Tristan, member of the Richmond Farmland Owners Association, spoke in opposition to the proposed bylaw, noting that farming is a complex business and one that is continuously evolving. He commented on technologies that are advancing farming and allowing farmers to increase production. He then referenced figures from Statistics Canada with regard to farming. He was of the opinion that farmers and experts were not consulted and therefore, the Richmond Farmland Owners Association cannot support the proposed bylaw.

Dr. Laila Benkrima, Research Scientist and Instructor of Horticulture at the University of the Fraser Valley, advised that the food industry is highly regulated and that impermeable floors in greenhouses allow for better bio-security. She noted that farmers need to ensure safety of the food as well as earn a living and greenhouses provide an advantage as crops grown in greenhouses use less water, little to no pesticides and provide high quality yields. She was of the opinion that with continual technological advancement and the expansion of crops, the number of greenhouses will increase and the type of flooring used will be vital to their success.

Clayton Chessa, Langley, referenced an article from *Motherboard* (attached to and forming part of these Minutes as Schedule 22) and commented on greenhouses being the future of food and how greenhouses are helping create food supply in areas where food security was a challenge.

Laura Gillanders, Richmond resident, spoke in support of the proposed bylaw, and was of the opinion that it would not prohibit farmers from farming as impermeable surfaces are not commonly utilized in greenhouses. She noted that Richmond has the most high quality soil to grow ground crops and therefore was concerned with the loss of soil should large concrete slabs be permitted.

Ben Dhiman, 9360 Sidaway Road, noted that it is becoming more difficult to farm and many variables are considered in making a farm a successful business. He remarked that a controlled environment is necessary in order to expand a short farming season. He was of the opinion that placing restrictions on farm structures will hinder farm activities and urged Council to support farmers and the farming industry.

Dale Badh, 2831 Westminster Highway, echoed the comments made by previous delegations and urged Council to consider the recommendations of the Agricultural Advisory Committee and the Richmond Farmland Owners Association.



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Mr. Kallu, 1342 52<sup>nd</sup> Street, Tsawwassen, commented on the history of commercial farming, noting that since its inception, farmers have had the right to choose what to farm, how to grow it and how to sell. The *Farm Practices Protection (Right to Farm) Act* allows farmers to farm without fear of complaints from others; he spoke of BC Supreme Court rulings and cited concern with the proposed bylaw as he believed it would infringe on farmers' right to farm. Mr. Kallu then spoke of the City's Agricultural Viability Strategy, noting that diversification in the agricultural industry should be supported. Mr. Kallu requested that the proposed bylaw be rejected and urged Council to consider the recommendations and comments made by experts and farmers.

Brad Dore, queried the 'fast track' application process and whether it would be site specific.

Mayor Brodie acknowledged the conclusion of the first round of speakers. Two speakers then spoke for a second time on new information.

Niti Sharma, 11380 Kingfisher Drive, noted that evidence based policies are required when considering the proposed bylaw and therefore individual opinions do not present sufficient proof.

Todd May, Co-Chair, Agricultural Advisory Committee, spoke on the "fast track" process, noting that a clearly defined process needs to be in place. He remarked that stakeholders were not adequately consulted and therefore, he believed that there is a lack of understanding of the proposed bylaw's impacts on farmers.

Mr. Kallu, 1342 52<sup>nd</sup> Street, Tsawwassen, noted that limiting the size of concrete slabs in greenhouses and other agricultural buildings will also limit the design of the structures.



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Joe Erceg, General Manager, Planning and Development, provided more information on the “fast track” development application process, noting that a development variance permit would be required for a concrete floor larger than 300 m<sup>2</sup> for agricultural buildings, and a rezoning permit for all greenhouses that propose a concrete floor of any size. He advised that a “fast track” review process would be applicable to these applications whereby a building permit review, soil deposit review and a “fast track” staff report process would occur concurrently. Mr. Erceg then noted that a development application fee of \$200 would be applicable and the development variance permit process would take approximately two months and a rezoning application process would take approximately three months.

PH18/6-14

It was moved and seconded

*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9861 be given second and third readings.*

The question on the motion was not called as the following **amendment motions** were introduced:

PH18/6-15

It was moved and seconded

*That Bylaw 9861 be amended in Part 6 b) to read as follows:*

*“6) The provisions of Section 14.1.4.4 and 14.1.4.5 do not apply for:*

- b) Agricultural buildings and structures on a lot, excluding greenhouses, with a cumulative lot coverage equal to or less than 350 m<sup>2</sup> in total area for all existing and proposed agricultural buildings and structures.”*

**DEFEATED**

Opposed: Mayor Brodie  
Cllrs. Dang  
Johnston  
Loo  
McNulty  
McPhail



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PH18/6-16

It was moved and seconded

*That Bylaw 9861 be amended in Part 6 b) to read as follows:*

*“6) The provisions of Section 14.1.4.4 and 14.1.4.5 do not apply for:*

- b) Agricultural buildings and structures on a lot, excluding greenhouses, with a cumulative lot coverage equal to or less than 500 m<sup>2</sup> in total area for all existing and proposed agricultural buildings and structures.”*

**DEFEATED**

Opposed: Cllrs. Au  
Dang  
Johnston  
Loo  
McNulty  
McPhail

PH18/6-17

It was moved and seconded

*That Bylaw 9861 be amended in Part 6 b) to read as follows:*

*“6) The provisions of Section 14.1.4.4 and 14.1.4.5 do not apply for:*

- b) Agricultural buildings and structures on a lot, excluding greenhouses, with a cumulative lot coverage equal to or less than 750 m<sup>2</sup> in total area for all existing and proposed agricultural buildings and structures.”*

**CARRIED**

Opposed: Cllr: McNulty

The question on second and third readings of Richmond Zoning Bylaw 8500, Amendment Bylaw 9861, as amended, was then called and it was **CARRIED** with Cllr. Loo opposed.

PH18/6-18

It was moved and seconded

*(1) That Richmond Zoning Bylaw 8500, Amendment Bylaw 9861 be reviewed in one year; and*

*(2) That staff report back regarding undertaking a public consultation process.*

**CARRIED**



**Regular Council meeting for Public Hearings  
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PH18/6-19

It was moved and seconded

*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9861 be adopted.*

**CARRIED**

Opposed: Cllr. Loo

**8. RICHMOND OFFICIAL COMMUNITY PLAN BYLAW 9000,  
AMENDMENT BYLAW 9869 AND RICHMOND ZONING BYLAW  
8500, AMENDMENT BYLAW 9870**

(Location: All properties zoned Agriculture (AG1); Applicant: City of Richmond)

*Applicant's Comments:*

Staff was available to respond to queries.

*Written Submissions:*

None.

*Submissions from the floor:*

John Roston, 12262 Ewen Road, expressed concern with the elimination of the rezoning process for additional farm worker dwellings. He noted that a rezoning process would allow for a more thorough review of the use of the additional dwelling. He questioned the authenticity of requests for additional dwellings and therefore wished to see a vetting process in place to validate that the requested additional dwelling is in fact for farm workers.

Niti Sharma, 11380 Kingfisher Drive, spoke in opposition to the proposed bylaw and suggested incorporating a rezoning process for additional dwellings on agricultural land. She was of the opinion that allowing secondary dwellings on agricultural land would further increase real estate speculation on agricultural land.

Todd May, Co-Chair, Agricultural Advisory Committee, noted that the AAC supports the proposed bylaw and believed that the proposed bylaws will further sustain the viability of agriculture in Richmond.

Laura Gillanders, Richmond resident, expressed concern with the proposed bylaw and stated that she is discouraged to see it in light of the discussions on the effects of large homes on farmland. She was of the opinion that implementing a rezoning process for additional dwellings on agricultural land is important as it would implement a thorough review of the request.



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- PH18/6-20            It was moved and seconded  
*That the June 18, 2018 Public Hearing proceed past 11:00 p.m.*  
**CARRIED**
- PH18/6-21            It was moved and seconded  
*That Official Community Plan Bylaws 9000, Amendment Bylaw 9869 be given second and third readings.*  
The question on the motion was not called as discussion took place on the application process for an additional dwelling on agricultural land. In reply to queries from Council, Mr. Erceg noted applications that meet the criteria for an additional dwelling unit would not be further evaluated by staff.  
The question on the motion was then called and it was **CARRIED** with Mayor Brodie, Cllrs. Day and Steves opposed.
- PH18/6-22            It was moved and seconded  
*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9870 be given second and third readings.*  
**CARRIED**  
Opposed: Mayor Brodie  
                  Cllrs. Day  
                  Steves
- PH18/6-23            It was moved and seconded  
*That Official Community Plan Bylaws 9000, Amendment Bylaw 9869 be adopted.*  
**CARRIED**  
Opposed: Mayor Brodie  
                  Cllrs. Day  
                  Steves
- PH18/6-24            It was moved and seconded  
*That Richmond Zoning Bylaw 8500, Amendment Bylaw 9870 be adopted.*  
**CARRIED**  
Opposed: Mayor Brodie  
                  Cllrs. Day  
                  Steves



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ADJOURNMENT

PH18/6-25

It was moved and seconded  
*That the meeting adjourn (10:58 p.m.).*

**CARRIED**

Certified a true and correct copy of the  
Minutes of the Regular meeting for Public  
Hearings of the City of Richmond held on  
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Mayor (Malcolm D. Brodie)

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Acting Corporate Officer (Claudia Jesson)



Schedule 1 to the Minutes of the  
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**Berg,Hanieh**

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**From:** McMullen,Mark  
**Sent:** Friday, 15 June 2018 10:42  
**To:** Berg,Hanieh  
**Subject:** FW: Email of support for Item No. 1 for June 18/18 Public Hearing

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**From:** Dana Westermarck [<mailto:dana@orisconsulting.ca>]  
**Sent:** Friday, 15 June 2018 10:30  
**To:** Paul Dmytriw; McMullen,Mark  
**Subject:** Email of support

To who concern:

I support the project in Gilley Rd in Richmond Hamilton area for Re zoning , and these area really need to developed  
Thank you.

Randy Barber  
150-23200 Gilley Rd  
Richmond,BC  
Sent from my iPhone



June 15, 2018

City of Richmond  
1<sup>st</sup> Floor, Richmond City Hall  
6911 No.3 Road, Richmond BC V6Y 2C1

Re: Proposed Rezoning for location 23200 Gilley Road, Richmond BC by Oris Developments (Hamilton) Corp.

To whom it may concern:

My name is Kal Gill and I am a business owner at 23200 Gilley Road, Richmond. I am writing in regards to the above mentioned application. I have gone over the plans and know the site quite well. I wish to offer my support for the proposal for various reasons, below I have outlined a few.

My understanding is that the proposal consists of 2 four-storey buildings with commercial space on the ground floor. The added commercial space will allow for more amenities within our community.

If Oris Developments was to bring in a grocery store it would be a great benefit for us because it will be within walking distance. The nearest grocery store is Walmart in New Westminster. It is a five minute drive, in a really congested plaza and it's not easy to get in and out.

There is a considerable and growing demand for housing in our neighbourhood. The 225 additional units are needed and would really help our community thrive.

Oris developments have ensured the new facilities would be easily accessible by foot or bicycle. This was a very socially responsible move on their end, and they have listened to our communities needs. The site for this development has been well chosen and thought out. I feel very comfortable supporting them.

Thank You,  
Connect Insurance Brokers Inc.

  
Kal Gill



Schedule 3 to the Minutes of the  
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Darbara Sandhu  
5520 Smith Drive  
Richmond, B.C.  
V6V 2K8

June 15, 2018

City of Richmond  
1<sup>st</sup> Floor, Richmond City Hall  
6911 No.3 Road, Richmond BC V6Y 2C1

Re: Proposed Rezoning for location 23200 Gilley Road, Richmond BC by Oris Developments (Hamilton)  
Corp.

To whom it may concern:

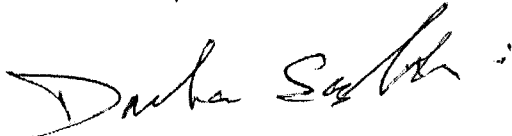
I am a long time resident of the Hamilton area. I am offering my support for the project mentioned  
above.

A few reasons for support of the project are:

- They may bring in a grocery store. That is much needed in our community
- They would bring in additional facilities and amenities
- There would be additional housing
- The new development will be pedestrian and bike friendly

I hope you take this into consideration.

Thank You,

  
Darbara Sandhu



Gurnam Kaur Kaila  
126 Viscount Place  
New Westminster, B.C.  
V3M 6L4

June 15, 2018

City of Richmond  
1<sup>st</sup> Floor, Richmond City Hall  
6911 No.3 Road, Richmond BC  
V6Y 2C1

**Re: Proposed Rezoning for location 23200 Gilley Road, Richmond BC**

I support the new development as it would give my community a great look. I am a senior and I often walk my grandkids to the nearby community centre. The new facilities would be greatly appreciated by my family and well used. If they bring in a new grocery store it would be welcome news and very convenient. I don't drive anymore so having so much within walking distance would greatly improve my life.

Sincerely,

G R KAILA

Gurnam Kaur Kaila



Schedule 5 to the Minutes of the  
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Uttam Singh Chane  
208 Campbell St.  
New Westminster, B.C.  
V3M 5V5

June 15, 2018

City of Richmond  
1<sup>st</sup> Floor, Richmond City Hall  
6911 No.3 Road, Richmond BC  
V6Y 2C1

Re: Proposed Rezoning for location 23200 Gilley Road, Richmond BC

Dear Sirs/Mesdames:

I am a resident of the Hamilton community and live a few blocks from the project site. I fully support the rezoning proposal mentioned above.

I support the new project because it will bring in more housing options. Also, this development will give the community new amenities which will be within walking distance. Its possible Oris Developments may bring in a new grocery store which is long overdue in the area.

Regards,

  
Uttam Singh Chane



Schedule 6 to the Minutes of the  
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June 14/2018

I Yvonne Meserol

4300 Thompson Rd

Richmond Va 23200  
at 23200 Gilly Rd

I Support the development  
Richmond R.C. V6V-216

Yvonne Meserol  
4300 Thompson Rd  
Richmond VA 23200



June 14, 2018

I Jonathan Osborne of 3211 Smith Drive  
Richmond BC V6V 2L6. I support the  
development at 23200 Gilley Road BC V6V 2L6

yours truly

Jonathan Osborne



Schedule 8 to the Minutes of the  
Public Hearing meeting of  
Richmond City Council held on  
Monday, June 18, 2018.

**Paulo's Pizza Ltd.  
Unit 140 – 23200 Gilley Road  
Richmond, B. C.  
(604) 524-4748**

June 15, 2018

To Whom It May Concern,

As an integral part of the East Richmond Community for the past 26 years, we support the upcoming development by Oris Development Corporation. The development is consistent with Vancouver city planners' aim to increase neighbourhood density now and into the future. The project will increase the services provided in the Hamilton area adding grocery store, doctor offices, coffee shops, pharmacies and other restaurants. Oris is also giving importance to the business that have existed in the area for years.

Paulo's Pizza Ltd. was one of the first businesses to open in the Hamilton area in 1991. While recognizing our loyalty to the neighborhood, Oris has offered new space to us in the development currently underway. We are looking forward to moving into this new development to serve our customers better. With a proposed corner shop and room for seating outside on the patio, Paulo's Pizza will continue to serve their current customer base and welcome new residents in the area.

This new development will be a great addition to the area introducing increased services for the current residents. Also, the residential units will make affordable housing within the city for first time buyers. The increase in customer base will allow current and new businesses to flourish. The development will make the area vibrant with increased foot traffic. We look forward to serving a diverse and modern neighbourhood for years to come.

Regards,

Rajan Dassan





Schedule 9 to the Minutes of the  
Public Hearing meeting of  
Richmond City Council held on  
Monday, June 18, 2018.

June 12, 2018

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

**RE: Hamilton Village-Parcel 1 development**

Dear Council,

I write in the strong support of the development of parcel 1 in the new Hamilton Village. The new development will be a great compliment to the already revitalizing community and will help attract much needed services to the area such as physicians, a pharmacy, and a neighborhood market.

Thank You

Jas Brar

*Jas Brar*



Schedule 10 to the Minutes of the Public Hearing meeting of Richmond City Council held on Monday, June 18, 2018.

**CityClerk**

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**From:** CityClerk  
**Sent:** Monday, 4 June 2018 14:25  
**To:** 'info@richmondfoa.ca'  
**Subject:** FW: Written Submission - June 18 Public Hearing  
**Attachments:** Letter to Mayor and Coucil - June 18 Public Hearing.pdf

Good afternoon,

This is to acknowledge and thank you for your email. Please be advised that copies of your email will be forwarded to the Mayor and each Councillor, and will be included as part of the June 18<sup>th</sup> Public Hearing Agenda materials. In addition, your email has been forwarded to staff in the Planning and Development Division.

Thank you again for taking the time to share your views with Richmond City Council.

**Hanieh Berg | Acting Manager, Legislative Services**  
City Clerk's Office | City of Richmond  
6911 No. 3 Road, Richmond, BC V6Y 2C1

---

**From:** Gunraj Gill [<mailto:info@richmondfoa.ca>]  
**Sent:** Monday, 4 June 2018 12:14  
**To:** CityClerk  
**Subject:** Written Submission - June 18 Public Hearing

City of Richmond  
City Clerk's Office  
6911 No. 3 Road  
Richmond, British Columbia

Please see attached a written submission from the Richmond Farmland Owners Association for the June 18 Public Hearing.

Please confirm receipt of this email.

Sincerely,





June 4, 2018

City of Richmond Mayor & Council  
6911 No. 3 Road  
Richmond, British Columbia  
V6Y 2C1 Canada

Dear City of Richmond Mayor & Council:

The Richmond Farmland Owners Association is passionately dedicated to the agricultural integrity of the place we call home, and are dedicated to the sustainable and pragmatic stewardship of both Richmond's farmland, and its farmers.

The City of Richmond is once again attempting to make it more difficult for Richmond Farmers to sustain and grow their farming operations by attempting to regulate large farm buildings and greenhouses by prohibiting the use of concrete slab floors in agricultural buildings over 300 sqm and in greenhouses of any size.

The City seems to think this is necessary to "preserve high-quality agricultural soils", believing concrete eliminates any possibility that a site can be used for soil-based agriculture again. This matter was discussed by Council on May 14. The report and minutes of that meeting can be viewed [HERE](#). Richmond's Agricultural Advisory Committee subsequently expressed its opposition, as have many others.

There is a long history of farming in this country, and we often cling to romanticized notions of simplicity, struggle, and sacrifice. In today's modern world, this idealized image of farming is no longer true, nor is it feasible.

We all believe the future for many agricultural commodities is in modern technology and innovative farming that supports investments in greenhouses, vertical farming operations and not just in soil-based farming.

The most efficient and effective greenhouses are those with concrete floors and imposing a ban on concrete will unfairly prejudice Richmond farmers and undermine the economic viability of their businesses, families, workers and local suppliers who serve them:

- (1) Many large food distributors require concrete floors before they'll accept a farmer as a supplier,
- (2) Concrete floors provide a higher degree of worker safety than dirt or other surfaces,
- (3) They are the best form of flooring for bio-security, productivity and food safety reasons,
- (4) They do not require the same level of maintenance and repair as dirt or other surfaces,
- (5) Several regulatory bodies have made concrete floors mandatory for certain products,
- (6) Concrete floors reduce wear and tear on farm machinery,
- (7) Concrete contributes to water use efficiency through better rates of recapture, and
- (8) Concrete prevents pesticides and herbicides from leaching into the soil.



We also believe such a ban is completely contrary to the policies of the Provincial government which encourage farming and support investment in large buildings and greenhouses.

This debate was sparked by concerns of food security and stability and we whole-heartedly support measures and policies that will increase food security and sustainability, especially with the current economic uncertainty that has been created with a looming trade-war with our biggest trading partner. Greenhouses and controlled environments supported by modern farming technologies will ensure sustainable and year-round production of disease free food.

We believe that Council and Staff have dangerously expedited this issue while ignoring the farmer's right to farm, ignoring the recommendations of the City's Agricultural Advisory Committee and not consulting with experts and stakeholders who will be directly impacted by the proposed changes.

By engaging in a defensive approach to law making which is not based on evidence, Council's actions are directly affecting farmers by creating economic uncertainty within the local farming community, and putting it's long-term sustainability at risk.

Thank you for your consideration. Please don't hesitate to contact us if you need any additional information.

Sincerely,

Richmond Farmland Owners Association

Schedule 11 to the Minutes of  
the Public Hearing meeting of  
Richmond City Council held on  
Monday, June 18, 2018.



[richmondchamber.ca](http://richmondchamber.ca)

June 15, 2018



Mayor Brodie and Council  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1

Dear Mayor and Council:

**Re: Bylaw to prohibit concrete slab floors in agricultural buildings over 300 sqm**

We are writing to express our concern with the City's plans to regulate large farm buildings and greenhouses by prohibiting the use of concrete slab floors in agricultural buildings over 300 sqm and in greenhouses of any size. We understand this matter will be coming before you on June 18.

Since commercial farming began in Richmond in the 19<sup>th</sup> century, Richmond's farmers, farm workers and farm families have constituted a significant part of our local economy. In fact our Chamber was established in 1925 primarily by members of the agriculture sector.

Not only do these families produce and sell a wide range of agricultural commodities, they support a broad range of Richmond businesses: legal, accounting, engineering and other professional firms; construction companies; equipment suppliers; restaurants and food processors; financial institutions; realtors; and many more. Scores of these businesses are members of the Richmond Chamber of Commerce.

The City has enshrined support for what our farmers do in many of its own bylaws, programs and policies. Paramount among them is its Agricultural Viability Strategy. Under the AVS the City has recognized that land in the ALR should be used to support a "competitive, diverse and flexible agricultural industry". More specifically, the AVS provides that Richmond bylaws should not impose unnecessary restrictions but should help Richmond's farmers to remain competitive and be "responsive to changing times".

The City's current plans to prohibit concrete slab floors undermine these laudable goals and potentially expose the City to legal challenges. They will impair the ability of existing farm businesses to determine the most effective and efficient methods of



production. They could deter future farm businesses from locating/investing in Richmond. They may also create uncertainty amongst all businesses in other sectors about what production methods or buildings/materials might be banned next.

The Richmond Chamber of Commerce urges council to reconsider this proposed bylaw for the sake of Richmond's farmers and the many other local businesses that rely on this valued and historic sector.

Sincerely,



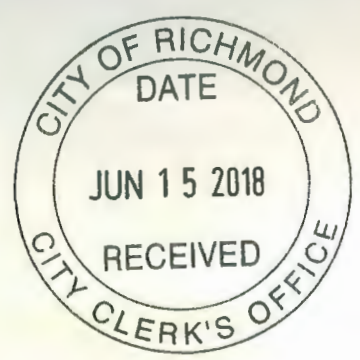
Barbara Tinson, Chair  
Richmond Chamber of Commerce

cc: Richmond Members of the Legislative Assembly  
Richmond Members of Parliament  
Provincial Agriculture Minister  
Richmond Farmland Owners' Association  
Richmond Farmers Institute  
Richmond Agriculture Advisory Committee

Schedule 12 to the Minutes of the Public Hearing meeting of Richmond City Council held on Monday, June 18, 2018.

# BRIEFING BOOKLET

# FUTURE OF FARMING



# RICHMOND FARMLAND

OWNERS ASSOCIATION

The Richmond Farmland Owners Association is made up of over 80 Member Families that own over 2500 acres of farm land in Richmond.

We are passionately dedicated to the agricultural integrity of the place we call home, and are dedicated to the sustainable and pragmatic stewardship of both Richmond's farmland, and its farmers.



Richmond Farmland Owners are currently growing their membership by bringing in a diverse group of people who support farmers and farming.



## BACKGROUND

In May 2017, the Richmond Farmland Owner's Association worked with City Council, Pioneer Farming Families and Local Community Groups to create new policies to reduce house sizes on our farmland.

After extensive and thorough consultation with the farming community, the City of Richmond adopted a policy to reduce the size of homes that can be built on farmland.

The policy set out of the following:

- On properties of up to 0.5 acres in size, homes of up to 5382 sqft may be built
- On properties sized greater than 0.5 acres, the maximum home size cannot exceed 10,763 sqft

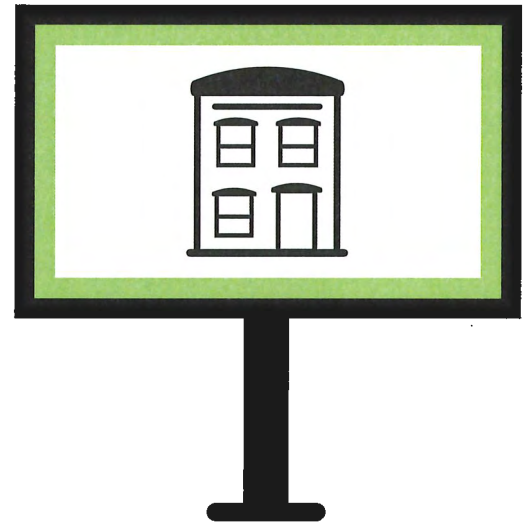
In February 2018, Council brought this issue back to impose further restrictions on house sizes without seeing the true effects of the existing by-law. The Richmond Farmland Owners Association then worked with the farming community and stakeholders to educate council and the public on modern day farming and the impact of any further restrictions.

Upon concluding their advocacy campaign, the Farmland Owners association with the support of some council members was able to keep the current by-law in place till it's true effects can be seen.

## ISSUE

Due to the results of the housing debate, many groups including certain councillors who advocated for further restrictions on house sizes on farmland have now brought up another issue with which they are trying to save face but the farmers are again the collateral damage - Further restrictions on Farm Structures and Buildings.

Council and Staff have dangerously expedited this issue while ignoring the farmer's right to farm, ignoring the recommendations of the City's Agricultural Advisory Committee and not consulting with experts and stakeholders who will be directly impacted by the proposed changes



## PROTECTING FARMERS RIGHTS

There is a long history of farming in this country, and we often cling to romanticized notions of simplicity, struggle, and sacrifice. In today's modern world, this idealized image of farming is no longer true, nor is it feasible.

By engaging in a defensive approach to law making which is not based on evidence, Council's actions are directly affecting farmers by creating economic uncertainty within the local farming community, and putting it's long-term sustainability at risk.

There are serious financial implications for Farmers if they are forced to go through a rezoning process. This process involves astronomic fees and months for the process to conclude from which the final decision might still be a refusal. This would make farmers jump through more unnecessary hoops at a very high cost to themselves and their businesses.

Council has ignored Right to Farm legislation. Council has ignored the recommendation of the AAC. Council has not consulted the ALC and the Richmond Farming Community.

By not consulting with experts that have first hand knowledge and will be directly impacted by these changes, council is making reckless decisions that will have very real negative impacts on Richmond's farming community.

This situation is creating economic uncertainty within the local farming community, and putting its long-term sustainability at risk.

## FUTURE OF FARMING

There is a long history of farming in this country, and we often cling to romanticized notions of simplicity, struggle, and sacrifice. In today's modern world, this idealized image of farming is no longer true, nor is it feasible.

Future farming is not exclusively soil-based and is increasingly automated and indoor.

Greenhouses and controlled environments provide a disease free environment which mitigates risk to the environment and provides year round and stable employment to their workforce

Greenhouses and controlled environments supported by modern farming technologies will ensure sustainable and year-round production of disease free food.



# GREENHOUSES - SETTING THE RECORD STRAIGHT

The City of Richmond is attempting to regulate large farm buildings and greenhouses by prohibiting the use of concrete slab floors in agricultural buildings over 300 sqm and in greenhouses of any size.

We all believe (a) the future for many agricultural commodities is in greenhouses, (b) the most efficient and effective greenhouses are those with concrete floors and (c) imposing a ban on concrete will unfairly prejudice Richmond farmers and undermine the economic viability of their businesses, families, workers and local suppliers who serve them:



- Many large food distributors require concrete floors before they'll accept a farmer as a supplier
- Concrete floors provide a higher degree of worker safety than dirt or other surfaces
- They are the best form of flooring for bio-security, productivity and food safety reasons
- They do not require the same level of maintenance and repair as dirt or other surfaces
- Several regulatory bodies have made concrete floors mandatory for certain products
- Concrete floors reduce wear and tear on farm machinery
- Concrete contributes to water use efficiency through better rates of recapture
- Concrete prevents pesticides and herbicides from leaching into the soil.



This debate was sparked by concerns of food security and stability and we whole-heartedly support measures and policies that will increase food security and sustainability, especially with the current economic uncertainty that has been created with a looming trade-war with our biggest trading partner.

Greenhouses and other controlled environments supported by modern farming technologies will ensure sustainable and year-round production of disease free food, increasing food security and stability

## WHAT THE EXPERTS HAVE TO SAY

*"Canada is at the vanguard of an agricultural revolution. Farm of the future will be better for the environment "*

**-Evan Fraser of the Arrell Food Institute**

"The future of farming in Canada is high tech and low impact"

**- CBC News, November 2017**

"Greenhouses only take up 0.01% of BC's farmland, but produce 11% of BC's total agriculture production"

**- BC Greenhouse Growers' Association**

*"If food waste were a country, it would be the third-largest emitter of greenhouse gases in the world"*

**- Macleans Magazine, 2015**

"Technology and science will be the drivers to enhance our social licence and entice consumers to our food - Intensive farming reduces agriculture's overall footprint and allows for an increase in set-aside lands such as grasslands and forages that are huge carbon sequestrers."

**- Brenda Lee Schoepp, Former Director of Farm Credit Canada**

"Local greenhouses may be a viable answer to the problem of food accessibility in the north."

**- VICE News, 2017**



[facebook.com/richmondfarmlandownersassociation](https://facebook.com/richmondfarmlandownersassociation)

Schedule 13 to the Minutes of  
the Public Hearing meeting of  
Richmond City Council held on  
Monday, June 18, 2018.



June 18, 2018

Mayor & Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Dear Mayor & Council,

**Proposed Regulations on Agricultural Buildings and Greenhouses – amendment bylaw 9861 or bylaw 9890**

In response to receiving several inquiries about the proposed bylaws we respectfully submit our comments and concerns. We recognize that cannabis production on farmland is a challenge that municipalities (including Delta) are currently dealing with. We do not want to see reactive policies that inhibit farm operations and agriculture.

The proposed bylaws will limit a producer's choice of legitimate and necessary building material on land (at times their own) to produce crops recognized as appropriate farming. It is overly restrictive and will negatively impact all agricultural sectors. We believe either of these bylaws will not mediate cannabis production issues and that more discussion on methods and planning for regulation with agricultural stakeholders is needed. This would be more effective and efficient to alleviate concerns about sustainable farming land use.

Our goal has always been to assist producers to increase the quality and quantity of agricultural production. The Delta Farmers' Institute strongly agree with your Agricultural Advisory Committee that these bylaws should not be passed.

Please do not hesitate to contact us if you would like to discuss this further.

Sincerely,

A handwritten signature in black ink that reads "David Ryall".

David Ryall  
President

Cc: Honorable Lana Popham, BC Minister of Agriculture  
Jennifer Dyson, Chair, Agricultural Land Commission  
Agricultural Advisory Committee, City of Richmond



P.O. Box 18565 | Delta, British Columbia, Canada v4k 4v7 | tel / fax 604 940 2024 | toll free 1 888 940 2024 | email lyeedfi@telus.net

*The Delta Farmers' Institute (DFI) has been established since 1898 and currently represents over 100 members of the farming community in Delta BC. Farming is a vital socio-economic asset in Metro Vancouver, generating 25% of BC's food production on 1.5% of the province's agricultural land. Delta produces over \$300 million in farm receipts. Over 90% of farms are family owned and operated by multi-generational families on large parcels of farmland with some of the best soils and climate for agriculture in Canada.*



June 15, 2018

His Worship, Malcolm Brodie, and Council  
City of Richmond  
6911 No. 3 Road  
Richmond, B.C.  
V6Y 2C1

RE: City of Richmond Zoning Bylaw 8500, Amendment Bylaw 9861

Dear Mayor Brodie and Council,

Concrete BC currently represents over 65 concrete producers operating more than 120 plants in the province and approximately 76 supplier members to the industry. It has been brought to our attention that City of Richmond staff are proposing a change to the City's zoning bylaw 8500 through amendment bylaw 9861. It appears the amendment has been tied to the reported increase in building permit applications for large glasshouses, which is surmised to be related to the potential growth of cannabis.

First and foremost, Concrete BC does not believe that there should be any connection drawn between the growth of cannabis and restrictions on the use of concrete foundations and slabs in agricultural buildings, including greenhouses. These are two entirely different issues and should be considered separately. This view appears to be supported by Council, as Part (3) of the proposed cannabis bylaw framework and regulation of agricultural structures was referred back to staff at the May 14, 2018 Council meeting.

Concrete slabs in greenhouses improve the viability of agricultural production because there are lower maintenance and repair requirements of the structures, reduced wear and tear on farm equipment, reduced fugitive dust emissions, and a reduction in, and potentially complete elimination of, unwanted egress of fertilizers, herbicides and pesticides into groundwater and surrounding water ways.

Concrete slabs as working surfaces increase worker safety by providing an even footing, reducing slips, trips and falls in comparison to dirt surfaces. In some cases, concrete slabs may be required by some agencies, regulatory bodies, and food distributors to increase bio-security and food safety.

In summary, the proposed restrictions, could adversely affect the viability of food production and are an unintended consequence of the amendment.

Sincerely,

Carolyn Campbell  
Executive Director



**MayorandCouncillors**

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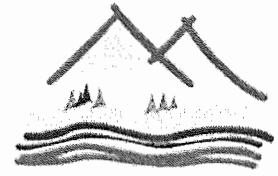
**From:** Darrell Zbeetnoff <zbeetnoffdarrell16@gmail.com>  
**Sent:** Monday, 18 June 2018 10:31  
**To:** MayorandCouncillors  
**Subject:** Submission Re: Proposed bylaw to ban concrete in Large Agricultural Buildings and Commercial Greenhouses  
**Attachments:** Agrologist Opinion Jun 18 2018.pdf

Dear Mayor and Council,  
The attached document is a professional agroloist opinion on your proposed bylaw. Please make available for the public hearing to be held Jun 18 2018.  
Regards,  
Darrell Zbeetnoff, Director

*Zbeetnoff Agro-Environmental Inc.*  
*15787 Buena Vista Avenue*  
*White Rock, BC, Canada, V4B1Z9*  
*PH: 604-535-7721*  
*FAX: 604-535-4421*  
*Cell: 604-612-8786*  
*[www,zbeetnoffagro-environmental.com](http://www.zbeetnoffagro-environmental.com)*







**ZBEETNOFF**  
AGRO-ENVIRONMENTAL  
INC.

15787 Buena Vista Avenue  
White Rock, BC, V4B 1Z9

W: 604.535.7721

C: 604.612.8786

F: 604.535.4421

zbeetnoff@telus.net  
www.zbeetnoffagro-environmental.com

**June 18, 2018**

To: Richmond Mayor and Council

Topic: Cannabis Bylaw Framework and Regulation of Agricultural Structures

My name is Darrell Michael Zbeetnoff. I am a Professional Agrologist, Certified Agricultural Consultant and Registered Environmental Farm Planner. My company, Zbeetnoff Agro-Environmental Inc., has provided consulting services to stakeholders in BC agriculture since 1988. I have provided extensive services to the most agricultural sectors in environmental farm planning, business planning, marketing, energy options and issues analysis.

The purpose of the attached opinion is to focus discussion on the potential impact on agriculture of Richmond's "Proposed Regulations for Agricultural buildings and Greenhouses" as explained in a Report to the Richmond's General Purposes Committee from Barry Konkin, Manager of Policy Planning and Carli Edwards, Manager of Community Bylaws and Licensing, entitled "Cannabis Bylaw Framework and Regulation of Agricultural Structures, April 18, 2018" (CBFR&RAS).

The objective of the City's CBF&RAS appears to be to strictly limit and/or prohibit cannabis retailing, production, research and development, and distribution in Richmond to counter the effects of:

1. The federal legalization of cannabis for medicinal and recreational purposes, which is anticipated to lead to increased threats to the safety of the community, interfere with community planning objectives, and lead to increased municipal costs related to equipment and staffing costs to implement City bylaws and regulations.
2. Provincial legalization of cannabis activity in the Agricultural Land Reserve (ALR), anticipated to lead to the conversion of food production greenhouses to cannabis production and construction of new greenhouse facilities purpose-built for cannabis production in Richmond's farming areas.

While there is provision in the cannabis legislation for municipalities to regulate the impacts of federal cannabis legalization, there is no similar provision for municipalities to regulate cannabis production on farmland in the ALR. As such, Richmond is proposing to introduce bylaws, one of which would restrict

the use of concrete in the construction of agricultural buildings, including greenhouses, with the intent of limiting cannabis production on the ALR in Richmond.

While Richmond cannot outright prohibit agricultural practices and activities permitted by the Provincial Acts and Regulations, the municipality can regulate and restrict agricultural activities that legitimately violate the intent of City bylaws to provide good government, community benefit, stewardship of the public assets of its community and foster the economic, social and environmental well-being of its community. In this instance, the application of at least two provincial laws is being challenged:

1. The Agricultural Commission Act and Regulation, specifically the permitted use of the ALR for the purposes of the production of marihuana for medical purposes, and
2. The Farm Practices (Right to Farm) Act, specifically the right to use normal farm practices to carry out farming operations.

Richmond proposes to limit construction methods of agricultural buildings, to protect high-quality soils for future soil-based agriculture, by:

- a) Prohibiting use of concrete slab floors and strip footing type construction to support an agricultural building or greenhouse
- b) Limiting farm building construction methods (not including greenhouses) to individual spread footing construction, not permitting concrete grade beams connecting concrete pad foundations
- c) Limiting interior agricultural building impermeable surfaces to no greater than 10% of gross ground level floor area (not including greenhouses)
- d) Exempting agricultural buildings less than 300m<sup>2</sup> (3,230 sq.ft.) in area, but not including greenhouses.

This opinion discusses why the arguments (Section 5 of Konkin/Edwards report) provided by Richmond to support the bylaw do not pass muster as a rationale for an attack on farming practices in general and agricultural operations with large buildings and greenhouses, in particular.

**A. Richmond Claim (paraphrased):**

**Large agricultural buildings and commercial greenhouses negatively impact the soil -capability of land and limit the ability to undertake soil-based farming in the future by:**

- a. Removing and wasting existing soil and importing fill
- b. Loss of farmland at the end of the building lifespan
- c. Compaction of the underlying subsoil.

**Reality:**

Land preparation, soil handling and site remediation associated with large agricultural buildings and commercial greenhouses are determined by municipal requirements related to existing soil, decommissioning and remediation. For example, see Delta requirements.

**More Reasonable Approach:**

Local governments can require large agricultural building developments and commercial greenhouses to conserve topsoil. Many greenhouses create berms with the topsoil along the perimeter of their properties, which can be spread back on the subsoil, if and when the large agricultural building and/or greenhouse is no longer used or required for its intended purpose.

Local governments can require that large agricultural and commercial greenhouse developments post bonds or other security to ensure that structures that have lost their functionality are dismantled and the land returned to natural state.

Agricultural soil remediation, including full relief from subsoil compaction is a widespread successful practice, used for dealing with agricultural impacts associated with construction and maintenance of pipelines. Local governments can require from agricultural developers that the land bases of decommissioned large agricultural buildings and greenhouses are restored to the pre-existing natural state, when decommissioning occurs. Protocols developed for soil handling, storage and remediation to restore soil quality and productivity are practical and effective.

**B. Richmond Claim:**

**Native soil removal, in conjunction with construction of agricultural buildings with impermeable surfaces, can also have impacts on storm water drainage.**

**Reality:**

Since Richmond is below sea level, all storm water is ultimately removed by pumping into the ocean. Impermeable surfaces do not change the amount of storm water requiring handling but, if not managed, have the potential to increase peaks and rapidity of storm water flow.

**More Reasonable Approach:**

Local governments can require large agricultural buildings and commercial greenhouses to detain storm water on site by means of detention ponds to relieve pressure on regional drainage systems in storm events. This strategy is used successfully in several neighbouring municipalities including Surrey and Delta.

**C. Richmond Claim:**

**When building and foundation removal and remediation activities are completed, the soils are likely to be at a lower agricultural capability when compared to the previous undisturbed soils .... It is more likely that a site occupied by large agricultural buildings and greenhouses would not be used for soil-based agriculture in the future**

**Reality:**

Extensive soils displacement and handling associated with highway and pipeline construction in BC indicates that soil productivity in the remediated state may, in fact, exceed the pre-existing state. Remediation practices are extremely sophisticated in North America generally and the

protocols developed for the Trans Mountain Expansion Pipeline are readily transferrable to Richmond soils.

**More Reasonable Approach:**

Local governments can require large agricultural buildings and commercial greenhouses to remediate soils under decommissioned large agricultural buildings and commercial greenhouses, based on protocols that have been demonstrated to be effective locally.

**Other Comments:**

With respect to the likelihood that remediated soils would not be used for soil-based agriculture in the future, this is conjectural and highly dependent on the economics associated with various cropping options in the future. Given that greenhouse productivity per square meter is over 25 times field-based agriculture, greenhouse production may be around for some time. In terms of climate change adaptation, greenhouse technology in energy efficiency and recycling is well-placed to deal with the vagaries and risks associated with precipitation and temperature variability, disease, and pests.

With respect to other large agricultural buildings, individual circumstances will determine if they may be repurposed for use in other agricultural enterprise. There are many examples of livestock barns converted into implement sheds for blueberry and vegetable operations. In any case, even field based agricultural operations need storage, crop handling and storage areas and repurposed buildings are often economical options.

**D. Other Relevant Comments**

It is important to highlight that farm operations construct agricultural buildings with more expensive concrete slabs and strip footings for various sound reasons, including:

- Exclusion of vermine (livestock)
- Elimination of weed pests (greenhouse)
- Better control of disease
- Stable foundation for glass greenhouses, particularly on peaty soils found in many areas of Richmond and the Lower Mainland
- Use of concrete as a medium for radiant heating and passive energy (heat storage)
- Sanitation respecting feed, animal and plant health
- Ease of movement in tending greenhouse crops, harvesting and handling of produce
- Ease of movement in handling manure, livestock feed,
- Recycling of water and nutrients (greenhouse)
- Protection of groundwater, soils and the environment in the storage and handling of woodwaste and petroleum, storage and mixing of pesticides and fertilizers, operation of boilers, and servicing and maintenance of farm equipment.

Prohibition of concrete slabs and strip footings in large agricultural buildings and greenhouses has the potential to create substantial additional operational costs in new structures. This

potential impact also needs to be considered in relation to Richmond's OCP which seeks to "ensure that the integrity of the ALR and its existing boundaries for both soil and non-soil bound agriculture (e.g., greenhouses) is maintained (Section 7.0: Agriculture and Food).

The usefulness of concrete in farming operations to protect the environment is recommended in the Environmental Farm Planning program. Concrete is one of the most inert structural substances (when dry), the easiest to recover from the environment during site reclamation, and for which there are existing recycling opportunities.

Sincerely,

A handwritten signature in cursive script, appearing to read "Darrell M. Zbeetnoff".

Darrell M. Zbeetnoff, P.Ag., CAC  
Director, Zbeetnoff Agro-Environmental Inc.

Schedule 16 to the Minutes of the Public Hearing meeting of Richmond City Council held on Monday, June 18, 2018.

**Mayor and Councillors**

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**From:** CityClerk  
**Sent:** Monday, 18 June 2018 12:54  
**To:** 'lindaenglish99@hotmail.com'  
**Subject:** FW: Public hearing submission for June 18, 2018 (Item No. 7)  
**Attachments:** COR-public hearing submission signed.pdf

Hello Ms. English,

This is to acknowledge and thank you for your email and attachment. This will be distributed at this evening's Public Hearing.

Regards,  
Hanieh

**Hanieh Berg | Acting Manager, Legislative Services**  
City Clerk's Office | City of Richmond  
6911 No. 3 Road, Richmond, BC V6Y 2C1  
Direct (604) 276-4163 · Fax (604) 278-5139

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**From:** Linda English [<mailto:lindaenglish99@hotmail.com>]  
**Sent:** Monday, 18 June 2018 09:24  
**To:** CityClerk  
**Subject:** Public hearing submission for June 18, 2018 (Item No. 7)

Dear City of Richmond Clerk,

Please find attached our letter of comments for submission for the public hearing today, on June 18, 2018.

Our comments are in reference to item number 7 – RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9861

Sincerely,

Linda English



13751 Garden City Road  
Richmond, BC V7A 2S5

June 18, 2018

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

Subject: Item No. 7 - RICHMOND ZONING BYLAW 8500, AMENDMENT BYLAW 9861

Dear Mayor and Councilors,

My family and I have owned the property at 13751 Garden City Road since 1979.

We oppose Bylaw 9861 (Option 1) and Bylaw 9890 (Option 2), and instead support Option 3.

For 39 years, my family and I have operated a family farming business on 13 acres of ALR land in Richmond. In 1995, we built a 4,000 square meter farm building to raise livestock. With a pending retirement, our family considered two options for the future of the family farm:

- sell our farm, so that it could become the target of another mansion house with no agriculture purpose; or
- maintain an operating farm business that could contribute to agriculture within our community.

We would like to keep farming, but are concerned about proposed bylaws 9861 and 9890.

We are concerned that these bylaws will be ineffective and counterproductive in meeting their stated objectives: to protect the long-term viability of soil based agriculture and to control cannabis production on ALR land.

One of our concerns is about the exemptions in the proposed bylaws. The exemptions would allow greenhouses to have 100% concrete floors and sprawl uncontrollably. This does not protect soil based agriculture; in fact, it paves the way for the large-scale destruction of soil based agricultural.

However, the bylaws do impose a maximum concrete floor area of 10% for non-greenhouse building, if the building is over 2,000 square meters. This is also of concern.

Many farming activities, like new vertical farming technologies, operate within farm buildings and produce significantly higher crop yields with a significantly lower footprint and impact on agricultural land, than greenhouse growing. Many such operations require concrete floors and could not effectively operate in a space under 2,000 square meters.

Also, limiting use of concrete floors in farm buildings could pose a risk to health within our community due to poor sanitation – a direct result of bylaws 9861 and 9890 being enacted.

Bylaws 9861 and 9890 will deprive our farmers, community, and our farmland of benefits from advances in indoor agriculture, and would instead encourage unfettered greenhouse proliferation.

As to controlling cannabis, most cannabis production in Canada is now grown in greenhouses, and this will continue and expand. The proposed bylaws will only serve to encourage cannabis production in greenhouses, on concrete floors, in an indiscriminately destructive manner and on a massive scale. Surely this is not the City of Richmond's intention.

The restriction on the use of concrete floors for buildings above a prescribed size could have other serious, unintended consequences.

Bylaws 9861 and 9890 allow for 100% concrete floors for buildings under 2,000 square meters but do not limit the number of buildings that can be erected on a lot, or address how multiple building configurations might render un-farmable viable land between buildings. Although set-backs and other zoning restrictions impose some limits, it's realistic to fear this, especially from indoor growers of cannabis that can generate high profit margins in smaller buildings.

We are also concerned that not enough consideration has been given to whether the City of Richmond has the legal authority to enact construction bylaws for farm buildings. To the best of our knowledge farm buildings and their construction are governed and regulated by the National Farm Building Code and the BC Building Act, not local government building bylaws. It would be shame if the City of Richmond put all this effort into doing something it has no legal right to do.

We encourage the City of Richmond to review the extent to which it has the legal authority to enact bylaws 9861 and 9890 as regards regulations on farm buildings, and not enact the bylaws if they will be illegal.

We believe that it is important that the City of Richmond establish well thought out and designed bylaws for the long-term viability of farmland, farmers, and our community. Bylaws 9861 and 9890 do not satisfy this standard and we say they should not be enacted.

We respectfully request that Council adopt "Option 3: Do not move forward with any regulations for agricultural buildings and greenhouses," and thereafter consider fresh options to protect soil based agriculture.

This request is also supported by the motion passed by the AAC on May 23, 2018, that Option 3 is consistent with the position and comments from the Committee.

Respectfully,



~ Linda English



Schedule 17 to the Minutes of the Public Hearing meeting of Richmond City Council held on Monday, June 18, 2018.

**MayorandCouncillors**

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**From:** Olive Gonzalez <Olive@UFGCA.COM>  
**Sent:** Monday, 18 June 2018 14:54  
**To:** MayorandCouncillors; CityClerk  
**Cc:** Bob Pringle  
**Subject:** The City of Richmond Proposed City Bylaw Amendments  
**Attachments:** City of Richmond.pdf

**Categories:** - TO: MAYOR & EACH COUNCILLOR / FROM: CITY CLERK'S OFFICE

On behalf of Robert S. Pringle, Chief Executive Officer, UFG Co-operative Association I attach a letter in opposition relating to the proposed bylaw amendments 9861 and 9890.

Thank you,  
Olive Gonzalez  
Executive Assistant





June 18, 2018

Mayor and Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

**Re: Proposed Amendment Bylaws 9861 and 9890 in respect of  
Agricultural Buildings and Greenhouses**

Dear Mayor and Council,

We represent the BC Floriculture Industry. BC farm gate revenues from mainly greenhouse grown flowering plants and cut flowers approach \$300 million annually. BC has a long tradition of growing quality floral products and with North America's largest Dutch auction, our products are well known throughout Canada and the US.

BC plants and flowers are mostly grown in a greenhouse environment. This allows growers to optimize use of land and employ technologies that allow them to compete on a world stage. Most global flower production comes from greenhouses – and technology is more important than ever. An example of technology used in flower greenhouses is ebb and flow watering systems where slabs are engineered to efficiently manage plant hydration and irrigation discharge. This is just one example of where growers need flexibility in the design and construction of systems that allow them to compete.

We believe the proposed amended bylaws will limit common sense adaptation of technology. Growers need to use systems that allow them to compete and are good for the environment.

More consultation is required with established agriculture before significant changes are made in this area. We cannot accept that concerns regarding cannabis production will restrict the normal evolution in our industry of production systems that are good for all.

Respectfully yours,

Robert S. Pringle  
Chief Executive Officer

Cc. Premier John Horgan  
Honourable Lana Popham, BC Minister of Agriculture  
Honourable Carole James, Minister of Finance  
Jennifer Dyson, Chair, Agricultural Land Commission  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition

Schedule 18 to the Minutes of the Public Hearing meeting of Richmond City Council held on , Monday, June 18, 2018.

**MayorandCouncillors**

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**From:** Danielle Synotte <dsynotte@bcac.ca>  
**Sent:** Monday, 18 June 2018 14:55  
**To:** CityClerk; MayorandCouncillors  
**Cc:** communications@bcac.bc.ca  
**Subject:** Re: Proposed Amendment Bylaws 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)  
**Attachments:** 2018-06-18 Letter of Support for BCGGA\_Proposed City Bylaw Amendments.pdf  
**Importance:** High

Good Afternoon,

Please find the attached letter from BC Agriculture Council in regards to the upcoming public hearing on the proposed bylaw amendments 9861 and/or 9890.

Thank you,

Danielle

Danielle Synotte

DIRECTOR OF COMMUNICATIONS & STAKEHOLDER ENGAGEMENT

P: 604 854 4483 | TF: 1 866 522 3447

[www.bcac.ca](http://www.bcac.ca)





*Leading the Way Together*

June 18, 2018

**Sent via email:** [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca); [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

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

Dear Mayor and City Council:

**Re: Proposed Amendment Bylaws 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)**

On behalf of BC Agriculture Council (BCAC), I am writing in support of the BC Greenhouse Growers' Association (BCGGA) letter of opposition relating to the proposed bylaw amendments 9861 and 9890.

BCAC is a provincial-wide, non-governmental general farm organization representing the farmers and ranchers of British Columbia. BCAC proudly serves nearly 30 commodity associations who in turn generate 96% of the farm gate receipts in B.C.

BCAC appreciates and respect the efforts made by all levels of government as interests rise over medicinal cannabis and possibly recreational cannabis production on farmland. However, with change comes responsibility and we all have an important role to play in supporting our food system.

As BCGGA's letter expressed, the proposed bylaw amendments would see the greenhouse vegetable growing industry extremely affected, but other agriculture commodity groups such as poultry, dairy, mushroom and flower growers will also be greatly impacted. BCAC understands what City Council is looking to achieve, however, the results will put **real** farmers, who contribute millions annually in farm cash receipts to the BC economy, out of business.

In conclusion, we support BCGGA that the bylaw amendments will not solve the challenges faced by Richmond (and other municipalities) with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland and feel that discussion with agricultural stakeholders is essential.

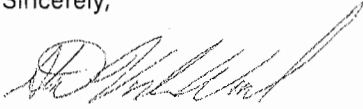
By proactively working together, we can achieve mutually beneficial policies, regulations and programs that support the sustainability and growth of B.C.'s agriculture industries. BCAC is available to take part in any opportunity for future collaboration on this matter.

P: 604.854.4454  
TF: 866.522.3447  
F: 604.854.4485

230-32160 South Fraser Way  
Abbotsford, BC, V2T 1W5

[bcac.ca](http://bcac.ca)

Sincerely,

A handwritten signature in black ink, appearing to read 'Stan Vander Waal', written in a cursive style.

Stan Vander Waal  
President, BC Agriculture Council

cc: Premier John Horgan  
The Honourable Lana Popham, BC Minister of Agriculture  
The Honourable Carole James, Minister of Finance  
Jennifer Dyson, Chair, Agricultural Land Commission  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition

Schedule 19 to the Minutes of the Public Hearing meeting of Richmond City Council held on Monday, June 18, 2018.

**Mayor and Councillors**

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**From:** Linda Delli Santi <Linda@bcgreenhouse.ca>  
**Sent:** Monday, 18 June 2018 15:14  
**To:** CityClerk; Mayor and Councillors  
**Subject:** BC Greenhouse Growers' Association submission to the proposed Bylaw Amendment 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)  
**Attachments:** BCGGA response to City of Richmond proposed Bylaw Amendment 9861 and-or 9890.docx

Richmond City Mayor and Councillors;  
Please find attached the BC Greenhouse Growers' Association submission to the proposed Bylaw Amendment 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations).  
Regards

*Linda Delli Santi*  
Executive Director  
BC Greenhouse Growers' Association

Telephone: 604.531.5262  
Facsimile: 604.542.9735  
207 – 15252 32<sup>nd</sup> Avenue, Surrey B.C., V3Z 0R7

Visit our website at [www.bcgreenhouse.ca](http://www.bcgreenhouse.ca)





BC  
**GREENHOUSE**  
GROWERS'  
ASSOCIATION

June 18, 2018

Sent via email: [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca) , [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Mayor and Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Re: Proposed Amendment Bylaws 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)

Dear Mayor and Council,

We acknowledge and recognize the challenges faced by a number of municipalities with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland with the impending and uncertain Federal Legislation.

The BC Greenhouse Growers' Association (BCGGA) represents 60 vegetable greenhouses in BC, producing on 750 acres. Greenhouse vegetable production is a major sector of the British Columbia Agricultural economy. The BC greenhouse vegetable industry contributes over \$350 million annually in farm cash receipts to the BC economy and exports over \$200 million of greenhouse vegetable products (tomatoes, peppers, cucumber, and lettuce) annually. The Fraser Valley in BC is the second largest greenhouse vegetable producing region in Canada behind Leamington Ontario.

The proposed amendment bylaw 9861 and the Richmond Agricultural Advisory Committee option 2, proposed amendment bylaw 9890 have been put forward to preserve and protect the long term viability of high quality agricultural soils for future soil based agriculture.

The BCGGA respectfully submits that greenhouse vegetable agriculture is an accepted and viable method of producing food for British Columbians, Canadians and the World, both now and for the

#207 -15252 32<sup>nd</sup> Ave  
Surrey, BC V3Z 0R7  
PH: 604 531-5262  
[www.bcgreenhouse.ca](http://www.bcgreenhouse.ca)



future. With greenhouses able to produce between 10 – 20 times more food than the same footprint in soil based agriculture, we believe with world population growth and increasing encroachment on agricultural lands that greenhouses will be large contributors in feeding the growing world population.

It is wrong to restrict the structure of greenhouses; there are always innovations in growing methods and new technologies, who of us knows what the future will bring? An example of a new technology being introduced in greenhouses currently is an induction tape in the concrete that moves carts from the production greenhouse to the grading and packing warehouse automatically, reducing the need for human involvement and creating efficiencies. This new innovative use of automation requires more concrete on the floor of a greenhouse and warehouse than previously used. The proposed amendment bylaws would not permit this adoption of new and innovative technologies.

There is mention of concerns for the possible impact greenhouses may have on the future soil-based farming of a parcel; there is no mention of the science behind those possible impacts. Greenhouse owners, when looking for land to purchase for a greenhouse expansion look for a large parcel of flat land with uncomplicated access to services such as water and natural gas and also proximity to market. The land is then laser leveled with minimal topsoil disruption. Concrete post supports and work pathways are poured in the greenhouse and slabs in the grading and packing areas and the warehouse. This concrete allows for the movement of equipment for production and harvesting needs as well as safeguards the food safety standards in the grading and packing areas and the warehouse. Food Safety requirements include a need for a cleanable surface that also ensures the ability to control rodents. This certainly allows the topsoil to be available for future soil-based farming, the soil has not been removed and the concrete can be removed if the greenhouse is ever decommissioned.

There is a discussion in the staff report of impermeable surfaces having an impact on storm water drainage, many municipalities require a storm water management plan when planning to build a greenhouse. This storm water management plan addresses on-site drainage and any possible impacts to the agricultural capability of the soil surrounding the greenhouse.

The staff report mentions that if a farmer wishes to construct a building that would not comply with the new bylaw amendment they could apply to rezone the property, which would be reviewed by staff and brought forward to Council for consideration. The BCGGA respectfully submits that the permitting process for a new greenhouse is onerous enough already without adding another unnecessary layer.

The BCGGA strongly supports the conclusions of the Richmond Agricultural Advisory Committee that the Bylaw Amendments should not be passed. We believe that the Bylaw Amendment will not solve the challenges faced by Richmond (and other municipalities) with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland with the impending and





BC  
**GREENHOUSE**  
GROWERS'  
ASSOCIATION

uncertain Federal Legislation. We do not believe this bylaw amendment is necessary to protect soil based agriculture for the future.

There needs to be more discussion and consultation with agricultural stakeholders to help shape the future of regulations that affect sustainable agricultural land use.

The BC Greenhouse Growers' Association and its' members remain available to take part in any further discussion.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Armand VanderMeulen'.

Armand VanderMeulen  
President, Chair, BC Greenhouse Growers' Association

Cc. Premier John Horgan  
Honourable Lana Popham, Minister of Agriculture  
Honourable Carole James, Minister of Finance  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition  
Jennifer Dyson, Chair, Agricultural Land Commission

Schedule 20 to the Minutes of  
the Public Hearing meeting of  
Richmond City Council held on  
Monday, June 18, 2018.



LETTERS OF SUPPORT



### Letters of Support Attached:

1. Richmond Farmland Owners Association
2. Concrete BC
3. Tom Baumann, President Expert Agriculture Ltd. (UFV) ✕
4. Richmond Chamber of Commerce
5. University of Fraser Valley ✕
6. Zbeetnoff Agro-Environmental Inc. – Professional Agrologist
7. United Flower Growers
8. Delta Farmers Institute
9. BC Agriculture Council
10. BC Greenhouse Growers Association



June 4, 2018

City of Richmond Mayor & Council  
6911 No. 3 Road  
Richmond, British Columbia  
V6Y 2C1 Canada

Dear City of Richmond Mayor & Council:

The Richmond Farmland Owners Association is passionately dedicated to the agricultural integrity of the place we call home, and are dedicated to the sustainable and pragmatic stewardship of both Richmond's farmland, and its farmers.

The City of Richmond is once again attempting to make it more difficult for Richmond Farmers to sustain and grow their farming operations by attempting to regulate large farm buildings and greenhouses by prohibiting the use of concrete slab floors in agricultural buildings over 300 sqm and in greenhouses of any size.

The City seems to think this is necessary to "preserve high-quality agricultural soils", believing concrete eliminates any possibility that a site can be used for soil-based agriculture again. This matter was discussed by Council on May 14. The report and minutes of that meeting can be viewed [HERE](#). Richmond's Agricultural Advisory Committee subsequently expressed its opposition, as have many others.

There is a long history of farming in this country, and we often cling to romanticized notions of simplicity, struggle, and sacrifice. In today's modern world, this idealized image of farming is no longer true, nor is it feasible.

We all believe the future for many agricultural commodities is in modern technology and innovative farming that supports investments in greenhouses, vertical farming operations and not just in soil-based farming.

The most efficient and effective greenhouses are those with concrete floors and imposing a ban on concrete will unfairly prejudice Richmond farmers and undermine the economic viability of their businesses, families, workers and local suppliers who serve them:

- (1) Many large food distributors require concrete floors before they'll accept a farmer as a supplier,
- (2) Concrete floors provide a higher degree of worker safety than dirt or other surfaces,
- (3) They are the best form of flooring for bio-security, productivity and food safety reasons,
- (4) They do not require the same level of maintenance and repair as dirt or other surfaces,
- (5) Several regulatory bodies have made concrete floors mandatory for certain products,
- (6) Concrete floors reduce wear and tear on farm machinery,
- (7) Concrete contributes to water use efficiency through better rates of recapture, and
- (8) Concrete prevents pesticides and herbicides from leaching into the soil.



We also believe such a ban is completely contrary to the policies of the Provincial government which encourage farming and support investment in large buildings and greenhouses.

This debate was sparked by concerns of food security and stability and we whole-heartedly support measures and policies that will increase food security and sustainability, especially with the current economic uncertainty that has been created with a looming trade-war with our biggest trading partner. Greenhouses and controlled environments supported by modern farming technologies will ensure sustainable and year-round production of disease free food.

We believe that Council and Staff have dangerously expedited this issue while ignoring the farmer's right to farm, ignoring the recommendations of the City's Agricultural Advisory Committee and not consulting with experts and stakeholders who will be directly impacted by the proposed changes.

By engaging in a defensive approach to law making which is not based on evidence, Council's actions are directly affecting farmers by creating economic uncertainty within the local farming community, and putting it's long-term sustainability at risk.

Thank you for your consideration. Please don't hesitate to contact us if you need any additional information.

Sincerely,

Richmond Farmland Owners Association



June 15, 2018

His Worship, Malcolm Brodie, and Council  
City of Richmond  
6911 No. 3 Road  
Richmond, B.C.  
V6Y 2C1

RE: City of Richmond Zoning Bylaw 8500, Amendment Bylaw 9861

Dear Mayor Brodie and Council,

Concrete BC currently represents over 65 concrete producers operating more than 120 plants in the province and approximately 76 supplier members to the industry. It has been brought to our attention that City of Richmond staff are proposing a change to the City's zoning bylaw 8500 through amendment bylaw 9861. It appears the amendment has been tied to the reported increase in building permit applications for large glasshouses, which is surmised to be related to the potential growth of cannabis.

First and foremost, Concrete BC does not believe that there should be any connection drawn between the growth of cannabis and restrictions on the use of concrete foundations and slabs in agricultural buildings, including greenhouses. These are two entirely different issues and should be considered separately. This view appears to be supported by Council, as Part (3) of the proposed cannabis bylaw framework and regulation of agricultural structures was referred back to staff at the May 14, 2018 Council meeting.

Concrete slabs in greenhouses improve the viability of agricultural production because there are lower maintenance and repair requirements of the structures, reduced wear and tear on farm equipment, reduced fugitive dust emissions, and a reduction in, and potentially complete elimination of, unwanted egress of fertilizers, herbicides and pesticides into groundwater and surrounding water ways.

Concrete slabs as working surfaces increase worker safety by providing an even footing, reducing slips, trips and falls in comparison to dirt surfaces. In some cases, concrete slabs may be required by some agencies, regulatory bodies, and food distributors to increase bio-security and food safety.

In summary, the proposed restrictions, could adversely affect the viability of food production and are an unintended consequence of the amendment.

Sincerely,

Carolyn Campbell  
Executive Director

**Expert Agriculture Team Ltd., 46420 Prairie Central Rd., Chilliwack, BC, V2P6H3**

**To Whom it may Concern**

**Date: 17 June 2018**

**Re: concrete flooring in greenhouses**

I was asked to comment on the benefits of concrete flooring in greenhouses, a topic before the City of Richmond. Why was I asked and what are my credentials? I have attached my CV to this note for a snapshot of my credentials. To the topic of greenhouse production, I have taught the subject at the University of the Fraser Valley for the past 28 years in the forms of: Agri 123 Horticulture lab, Agri 129 Horticulture lab, Agri 124 Horticulture Introduction, Agri 324 Greenhouse Production, as part of my seven course teaching load. I have for six years been active in greenhouse design for purpose built structures with BW Global structures as well as Prins Greenhouses. I helped design the Surrey Volken Academy Biopods for UFV together with BW Global, a novel concept. As part of the maintaining of my leading-edge knowledge, I read the Canadian and Canadian relevant publications, as well as toured greenhouses where students are on practicum or as part as the course syllabus. I have worked with several greenhouse operations on specialty crops, such as tropicals and berries, as well as with insurance and legal case expert reports. Lastly I travelled to Holland and Australia for specific greenhouse conferences as well as research facilities and have lead two symposia at UFV on modern greenhouse design with our partner university of HAS from Holland.

As part of the discussion of the benefits of concrete as flooring in greenhouse operations, I would like to make several comments:

- 1) Concrete in-floor heating for propagation is advantageous for sanitary and bottom heat reasons, so that ideal conditions are created for either seed or cutting reproduction. An essential addition for those operations that are propagation intensive, such as for nurseries, plug production for other operations, ornamental cuttings, as well as seed production for forestry, plugs and annuals.
- 2) Reflective surface by itself or covered with white plastic or painted white. In addition to modern greenhouse cladding materials that include a high degree of light diffusion (aka "haze") sending light through the canopy multiple times increases efficiency of production inside the greenhouse.
- 3) Concrete flooring is easier to clean up than soil. It is more sanitary, can be treated with organic or chemical disinfectants with no leaching into the soil.
- 4) Concrete is easy to maintain, thus lowering operational cost.

- 5) Concrete does not allow for bugs or disease organisms to hide in pores and re-infest/re-infect the crops.
- 6) Concrete does not allow for weed growth, thus reducing operational cost.
- 7) Concrete constitutes a thermal mass, i.e. it retains heat and/or cold, thus lowering energy inputs and giving a more even temperature profile.
- 8) Concrete does not allow for hiding spots for rodents, i.e. crop damage is reduced.
- 9) Concrete allows for better biosecurity than soil contact, a sticky point for edible crops these days. It reduces barriers for best management practices, for ISO, and HACCP certifications for example.
- 10) Concrete surface is safer to work on, no slipping with textured surfaces, comes in all sorts of forms, including non-slip floor.
- 11) Concrete footings and pads increase the security of the structure by anchoring the structure to the ground.
- 12) Drainage is controlled and no soil contamination. With concrete, 100% recirculation and recapturing are possible.
- 13) Concrete floors allow for high weight absorption, allowing for vertical growing and heavy apparatuses and mechanicals, such as for aquaponics higher up (vertically).
- 14) Concrete combines well with automation, fewer issues with advanced technologies, which may require 100% perfect grades and even surfaces to operate. A very important point, as labour is becoming increasingly hard to come by.
- 15) Concrete enables air tightness for complete control of the environment.
- 16) Concrete enables better quality control of the product, be it ornamental or food.
- 17) Concrete is essential in warehousing at the site, for running machinery on wheels for transport, loading/unloading, aisle ways, mechanical rooms, etc. None of this can be accomplished with any kind of mechanisation on soil.
- 18) Greenhouse irrigation has many options, one being flood floors, a very efficient system, based upon a concrete floor.

Concrete is a good pad to work with as a greenhouse grower. It is expensive to start with, however the benefits will outweigh the cost in the long run. From an environmental standpoint and for the preservation for soil in its original state, it is a protecting material. Should a greenhouse operation come to the end of its lifetime, the concrete pad can potentially survive a rebuild, as well as be removed and the soil is still in place.

I operate three greenhouses at UFV and one at my own nursery. At UFV, one has all concrete floors, two have soil floors. As an industry we struggle with uneven floors in the non-concrete floors. I cannot afford a concrete pad at my own small greenhouse. Pots with plants keep falling over, as soil is not an ideal levelling substrate and moves with water.

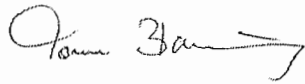
The future of greenhouse growing will include medicinal crops, it will include 100% cleanliness; it will include soil-less substrate growing. Concrete will deliver that, soil won't.



It is my opinion that limiting concrete pads for greenhouse, and for that matter nursery and livestock production, is severely limiting on agriculture. Especially when mechanisation and biosecurity are compromised.

Please take the above into consideration for a balanced decision on the subject.

Sincerely,

A handwritten signature in black ink that reads "Tom Baumann". The signature is written in a cursive style with a long horizontal stroke at the end.

Tom Baumann, President Expert Agriculture Team Ltd.

Attachment – CV of Tom Baumann

June 15, 2018

Mayor Brodie and Council  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1

Dear Mayor and Council:

**Re: Bylaw to prohibit concrete slab floors in agricultural buildings over 300 sqm**

We are writing to express our concern with the City's plans to regulate large farm buildings and greenhouses by prohibiting the use of concrete slab floors in agricultural buildings over 300 sqm and in greenhouses of any size. We understand this matter will be coming before you on June 18.

Since commercial farming began in Richmond in the 19<sup>th</sup> century, Richmond's farmers, farm workers and farm families have constituted a significant part of our local economy. In fact our Chamber was established in 1925 primarily by members of the agriculture sector.

Not only do these families produce and sell a wide range of agricultural commodities, they support a broad range of Richmond businesses: legal, accounting, engineering and other professional firms; construction companies; equipment suppliers; restaurants and food processors; financial institutions; realtors; and many more. Scores of these businesses are members of the Richmond Chamber of Commerce.

The City has enshrined support for what our farmers do in many of its own bylaws, programs and policies. Paramount among them is its Agricultural Viability Strategy. Under the AVS the City has recognized that land in the ALR should be used to support a "competitive, diverse and flexible agricultural industry". More specifically, the AVS provides that Richmond bylaws should not impose unnecessary restrictions but should help Richmond's farmers to remain competitive and be "responsive to changing times".

The City's current plans to prohibit concrete slab floors undermine these laudable goals and potentially expose the City to legal challenges. They will impair the ability of existing farm businesses to determine the most effective and efficient methods of



production. They could deter future farm businesses from locating/investing in Richmond. They may also create uncertainty amongst all businesses in other sectors about what production methods or buildings/materials might be banned next.

The Richmond Chamber of Commerce urges council to reconsider this proposed bylaw for the sake of Richmond's farmers and the many other local businesses that rely on this valued and historic sector.

Sincerely,



Barbara Tinson, Chair  
Richmond Chamber of Commerce

cc: Richmond Members of the Legislative Assembly  
Richmond Members of Parliament  
Provincial Agriculture Minister  
Richmond Farmland Owners' Association  
Richmond Farmers Institute  
Richmond Agriculture Advisory Committee



June 15, 2018

To whom it may concern:

I am writing in support of the Richmond Land Owner Association and their desire to permit the use of concrete floors in agriculture buildings and greenhouses larger than 300 sqm. Flat concrete floors are essential to the operation of large commercial greenhouses for a number of reasons.

Concrete floors are an essential component of a water management system in a greenhouse. Water needs to be treated as a scarce resource and therefore operators need to be able to collect and recycle water that escapes to the floor of the greenhouse.

In order to meet stringent government regulations regarding hygiene and food safety, greenhouses need to have a flooring that can be kept clean to high sanitation standards. Concrete floors can be kept clean and sanitized much more easily and efficiently than a soil based floor. Once contaminated or infested by a pest, the soil based floor can become a host for pests that threaten the very viability of the farm and the capacity of the grower to ensure that food remains safe to consume.

Modern farmers attain efficient operations through the use of technology such as robotics, automation and sensing equipment. These technologies require flat, stable surfaces to operate. Producers that are innovative and use technology effectively are more likely to be economically viable and will be better able to sustainably grow more food.

The Farm Practices (Right to Farm) Act was adopted in BC granting farmers the right to farm in BC's important farming areas, particularly the ALR, provided they use normal farm practices. Normal farm practices may generate noise, dust or smells from fans, delivery trucks or composting. Hence, modern greenhouses should be located on agriculture-zoned land or they may be unnecessarily constrained from realizing their full production potential.

Regards,

A handwritten signature in black ink that reads "Garry Fehr".

Garry Fehr, PhD  
Director of the Agriculture Centre of Excellence



**June 18, 2018**

To: Richmond Mayor and Council

Topic: Cannabis Bylaw Framework and Regulation of Agricultural Structures

My name is Darrell Michael Zbeetnoff. I am a Professional Agrologist, Certified Agricultural Consultant and Registered Environmental Farm Planner. My company, Zbeetnoff Agro-Environmental Inc., has provided consulting services to stakeholders in BC agriculture since 1988. I have provided extensive services to the most agricultural sectors in environmental farm planning, business planning, marketing, energy options and issues analysis.

The purpose of the attached opinion is to focus discussion on the potential impact on agriculture of Richmond's "Proposed Regulations for Agricultural buildings and Greenhouses" as explained in a Report to the Richmond's General Purposes Committee from Barry Konkin, Manager of Policy Planning and Carli Edwards, Manager of Community Bylaws and Licensing, entitled "Cannabis Bylaw Framework and Regulation of Agricultural Structures, April 18, 2018" (CBFR&RAS).

The objective of the City's CBF&RAS appears to be to strictly limit and/or prohibit cannabis retailing, production, research and development, and distribution in Richmond to counter the effects of:

1. The federal legalization of cannabis for medicinal and recreational purposes, which is anticipated to lead to increased threats to the safety of the community, interfere with community planning objectives, and lead to increased municipal costs related to equipment and staffing costs to implement City bylaws and regulations.
2. Provincial legalization of cannabis activity in the Agricultural Land Reserve (ALR), anticipated to lead to the conversion of food production greenhouses to cannabis production and construction of new greenhouse facilities purpose-built for cannabis production in Richmond's farming areas.

While there is provision in the cannabis legislation for municipalities to regulate the impacts of federal cannabis legalization, there is no similar provision for municipalities to regulate cannabis production on farmland in the ALR. As such, Richmond is proposing to introduce bylaws, one of which would restrict

the use of concrete in the construction of agricultural buildings, including greenhouses, with the intent of limiting cannabis production on the ALR in Richmond.

While Richmond cannot outright prohibit agricultural practices and activities permitted by the Provincial Acts and Regulations, the municipality can regulate and restrict agricultural activities that legitimately violate the intent of City bylaws to provide good government, community benefit, stewardship of the public assets of its community and foster the economic, social and environmental well-being of its community. In this instance, the application of at least two provincial laws is being challenged:

1. The Agricultural Commission Act and Regulation, specifically the permitted use of the ALR for the purposes of the production of marijuana for medical purposes, and
2. The Farm Practices (Right to Farm) Act, specifically the right to use normal farm practices to carry out farming operations.

Richmond proposes to limit construction methods of agricultural buildings, to protect high-quality soils for future soil-based agriculture, by:

- a) Prohibiting use of concrete slab floors and strip footing type construction to support an agricultural building or greenhouse
- b) Limiting farm building construction methods (not including greenhouses) to individual spread footing construction, not permitting concrete grade beams connecting concrete pad foundations
- c) Limiting interior agricultural building impermeable surfaces to no greater than 10% of gross ground level floor area (not including greenhouses)
- d) Exempting agricultural buildings less than 300m<sup>2</sup> (3,230 sq.ft.) in area, but not including greenhouses.

This opinion discusses why the arguments (Section 5 of Konkin/Edwards report) provided by Richmond to support the bylaw do not pass muster as a rationale for an attack on farming practices in general and agricultural operations with large buildings and greenhouses, in particular.

**A. Richmond Claim (paraphrased):**

**Large agricultural buildings and commercial greenhouses negatively impact the soil -capability of land and limit the ability to undertake soil-based farming in the future by:**

- a. **Removing and wasting existing soil and importing fill**
- b. **Loss of farmland at the end of the building lifespan**
- c. **Compaction of the underlying subsoil.**

**Reality:**

Land preparation, soil handling and site remediation associated with large agricultural buildings and commercial greenhouses are determined by municipal requirements related to existing soil, decommissioning and remediation. For example, see Delta requirements.

**More Reasonable Approach:**

Local governments can require large agricultural building developments and commercial greenhouses to conserve topsoil. Many greenhouses create berms with the topsoil along the perimeter of their properties, which can be spread back on the subsoil, if and when the large agricultural building and/or greenhouse is no longer used or required for its intended purpose.

Local governments can require that large agricultural and commercial greenhouse developments post bonds or other security to ensure that structures that have lost their functionality are dismantled and the land returned to natural state.

Agricultural soil remediation, including full relief from subsoil compaction is a widespread successful practice, used for dealing with agricultural impacts associated with construction and maintenance of pipelines. Local governments can require from agricultural developers that the land bases of decommissioned large agricultural buildings and greenhouses are restored to the pre-existing natural state, when decommissioning occurs. Protocols developed for soil handling, storage and remediation to restore soil quality and productivity are practical and effective.

**B. Richmond Claim:**

**Native soil removal, in conjunction with construction of agricultural buildings with impermeable surfaces, can also have impacts on storm water drainage.**

**Reality:**

Since Richmond is below sea level, all storm water is ultimately removed by pumping into the ocean. impermeable surfaces do not change the amount of storm water requiring handling but, if not managed, have the potential to increase peaks and rapidity of storm water flow.

**More Reasonable Approach:**

Local governments can require large agricultural buildings and commercial greenhouses to detain storm water on site by means of detention ponds to relieve pressure on regional drainage systems in storm events. This strategy is used successfully in several neighbouring municipalities including Surrey and Delta.

**C. Richmond Claim:**

**When building and foundation removal and remediation activities are completed, the soils are likely to be at a lower agricultural capability when compared to the previous undisturbed soils .... It is more likely that a site occupied by large agricultural buildings and greenhouses would not be used for soil-based agriculture in the future**

**Reality:**

Extensive soils displacement and handling associated with highway and pipeline construction in BC indicates that soil productivity in the remediated state may, in fact, exceed the pre-existing state. Remediation practices are extremely sophisticated in North America generally and the

protocols developed for the Trans Mountain Expansion Pipeline are readily transferrable to Richmond soils.

**More Reasonable Approach:**

Local governments can require large agricultural buildings and commercial greenhouses to remediate soils under decommissioned large agricultural buildings and commercial greenhouses, based on protocols that have been demonstrated to be effective locally.

**Other Comments:**

With respect to the likelihood that remediated soils would not be used for soil-based agriculture in the future, this is conjectural and highly dependent on the economics associated with various cropping options in the future. Given that greenhouse productivity per square meter is over 25 times field-based agriculture, greenhouse production may be around for some time. In terms of climate change adaptation, greenhouse technology in energy efficiency and recycling is well-placed to deal with the vagaries and risks associated with precipitation and temperature variability, disease, and pests.

With respect to other large agricultural buildings, individual circumstances will determine if they may be repurposed for use in other agricultural enterprise. There are many examples of livestock barns converted into implement sheds for blueberry and vegetable operations. In any case, even field based agricultural operations need storage, crop handling and storage areas and repurposed buildings are often economical options.

**D. Other Relevant Comments**

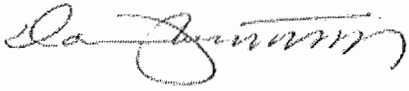
It is important to highlight that farm operations construct agricultural buildings with more expensive concrete slabs and strip footings for various sound reasons, including:

- Exclusion of vermine (livestock)
- Elimination of weed pests (greenhouse)
- Better control of disease
- Stable foundation for glass greenhouses
- Use of concrete for passive energy storage (storage)
- Sanitation
- Ease of movement in tending greenhouse crops and harvesting
- Ease of movement in handling manure, livestock feed
- Recycling of water and nutrients (greenhouse).

Prohibition of concrete slabs and strip footings in large agricultural buildings and greenhouses has the potential to create substantial additional operational costs in new structures. This potential impact also needs to be considered in relation to Richmond's OCP which seeks to "ensure that the integrity of the ALR and its existing boundaries for both soil and non-soil bound agriculture (e.g., greenhouses) is maintained (Section 7.0: Agriculture and Food).



Sincerely,

A handwritten signature in cursive script, appearing to read "Darrell M. Zbeetnoff".

Darrell M. Zbeetnoff, P.Ag., CAC  
Director, Zbeetnoff Agro-Environmental Inc.

June 18, 2018

Mayor and Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Re: Proposed Amendment Bylaws 9861 and 9890 in respect of Agricultural Buildings and Greenhouses

Dear Mayor and Council,

We represent the BC Floriculture Industry. BC farm gate revenues from mainly greenhouse grown flowering plants and cut flowers approach \$300millionannuall. BC has a long tradition of growing quality floral products and with North America’s largest Dutch auction, our products are well known throughout Canada and the US.

BC plants and flowers are mostly grown in a greenhouse environment. This allows growers to optimize use of land and employ technologies that allow them to compete on a world stage. Most global flower production comes from greenhouses – and technology is more important than ever. An example of technology used in flower greenhouses is ebb and flow watering systems where slabs are engineered to efficiently manage plant hydration and irrigation discharge. This is just one example of where growers need flexibility in the design and construction of systems that allow them to compete.

We believe the proposed amended bylaws will limit common sense adaptation of technology. Growers need to use systems that allow them to compete and are good for the environment.

More consultation is required with established agriculture before significant changes are made in this area. We cannot accept that concerns regarding cannabis production will restrict the normal evolution in our industry of production systems that are good for all.

Respectfully yours,

R S Pringle  
CEO United Flower Growers

Cc. Premier John Horgan  
Honourable Lana Popham, BC Minister of Agriculture  
Honourable Carole James, Minister of Finance  
Jennifer Dyson, Chair, Agricultural Land Commission  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition



June 18, 2018

Mayor & Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Dear Mayor & Council,

**Proposed Regulations on Agricultural Buildings and Greenhouses – amendment bylaw 9861 or bylaw 9890**

In response to receiving several inquiries about the proposed bylaws we respectfully submit our comments and concerns. We recognize that cannabis production on farmland is a challenge that municipalities (including Delta) are currently dealing with. We do not want to see reactive policies that inhibit farm operations and agriculture.

The proposed bylaws will limit a producer's choice of legitimate and necessary building material on land (at times their own) to produce crops recognized as appropriate farming. It is overly restrictive and will negatively impact all agricultural sectors. We believe either of these bylaws will not mediate cannabis production issues and that more discussion on methods and planning for regulation with agricultural stakeholders is needed. This would be more effective and efficient to alleviate concerns about sustainable farming land use.

Our goal has always been to assist producers to increase the quality and quantity of agricultural production. The Delta Farmers' Institute strongly agree with your Agricultural Advisory Committee that these bylaws should not be passed.

Please do not hesitate to contact us if you would like to discuss this further.

Sincerely,

A handwritten signature in black ink that reads "David Ryall".

David Ryall  
President

Cc: Honorable Lana Popham, BC Minister of Agriculture  
Jennifer Dyson, Chair, Agricultural Land Commission  
Agricultural Advisory Committee, City of Richmond

P.O. Box 18565 | Delta, British Columbia, Canada v4k 4v7 | tel / fax 604 940 2024 | toll free 1 888 940 2024 | email [lyeedfi@telus.net](mailto:lyeedfi@telus.net)

*The Delta Farmers' Institute (DFI) has been established since 1898 and currently represents over 100 members of the farming community in Delta BC. Farming is a vital socio-economic asset in Metro Vancouver, generating 25% of BC's food production on 1.5% of the province's agricultural land. Delta produces over \$300 million in farm receipts. Over 90% of farms are family owned and operated by multi-generational families on large parcels of farmland with some of the best soils and climate for agriculture in Canada.*



*Leading the Way Together*

June 18, 2018

Sent via email: [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca); [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

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

Dear Mayor and City Council:

**Re: Proposed Amendment Bylaws 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)**

On behalf of BC Agriculture Council (BCAC), I am writing in support of the BC Greenhouse Growers' Association (BCGGA) letter of opposition relating to the proposed bylaw amendments 9861 and 9890.

BCAC is a provincial-wide, non-governmental general farm organization representing the farmers and ranchers of British Columbia. BCAC proudly serves nearly 30 commodity associations who in turn generate 96% of the farm gate receipts in B.C.

BCAC appreciates and respect the efforts made by all levels of government as interests rise over medicinal cannabis and possibly recreational cannabis production on farmland. However, with change comes responsibility and we all have an important role to play in supporting our food system.

As BCGGA's letter expressed, the proposed bylaw amendments would see the greenhouse vegetable growing industry extremely affected, but other agriculture commodity groups such as poultry, dairy, mushroom and flower growers will also be greatly impacted. BCAC understands what City Council is looking to achieve, however, the results will put **real** farmers, who contribute millions annually in farm cash receipts to the BC economy, out of business.

In conclusion, we support BCGGA that the bylaw amendments will not solve the challenges faced by Richmond (and other municipalities) with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland and feel that discussion with agricultural stakeholders is essential.

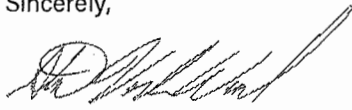
By proactively working together, we can achieve mutually beneficial policies, regulations and programs that support the sustainability and growth of B.C.'s agriculture industries. BCAC is available to take part in any opportunity for future collaboration on this matter.

P: 604.854.4454  
TF: 866.522.3447  
F: 604.854.4485

230-32160 South Fraser Way  
Abbotsford, BC, V2T 1W5

[bcac.ca](http://bcac.ca)

Sincerely,



Stan Vander Waal  
President, BC Agriculture Council

cc: Premier John Horgan  
The Honourable Lana Popham, BC Minister of Agriculture  
The Honourable Carole James, Minister of Finance  
Jennifer Dyson, Chair, Agricultural Land Commission  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition



BC  
GREENHOUSE  
GROWERS'  
ASSOCIATION

June 18, 2018

Sent via email: [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca) , [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Mayor and Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Re: Proposed Amendment Bylaws 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)

Dear Mayor and Council,

We acknowledge and recognize the challenges faced by a number of municipalities with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland with the impending and uncertain Federal Legislation.

The BC Greenhouse Growers' Association (BCGGA) represents 60 vegetable greenhouses in BC, producing on 750 acres. Greenhouse vegetable production is a major sector of the British Columbia Agricultural economy. The BC greenhouse vegetable industry contributes over \$350 million annually in farm cash receipts to the BC economy and exports over \$200 million of greenhouse vegetable products (tomatoes, peppers, cucumber, and lettuce) annually. The Fraser Valley in BC is the second largest greenhouse vegetable producing region in Canada behind Leamington Ontario.

The proposed amendment bylaw 9861 and the Richmond Agricultural Advisory Committee option 2, proposed amendment bylaw 9890 have been put forward to preserve and protect the long term viability of high quality agricultural soils for future soil based agriculture.

The BCGGA respectfully submits that greenhouse vegetable agriculture is an accepted and viable method of producing food for British Columbians, Canadians and the World, both now and for the

#207 -15252 32<sup>nd</sup> Ave  
Surrey, BC V3Z 0R7  
PH: 604 531-5262  
[www.bcgreenhouse.ca](http://www.bcgreenhouse.ca)



future. With greenhouses able to produce between 10 – 20 times more food than the same footprint in soil based agriculture, we believe with world population growth and increasing encroachment on agricultural lands that greenhouses will be large contributors in feeding the growing world population.

It is wrong to restrict the structure of greenhouses; there are always innovations in growing methods and new technologies, who of us knows what the future will bring? An example of a new technology being introduced in greenhouses currently is an induction tape in the concrete that moves carts from the production greenhouse to the grading and packing warehouse automatically, reducing the need for human involvement and creating efficiencies. This new innovative use of automation requires more concrete on the floor of a greenhouse and warehouse than previously used. The proposed amendment bylaws would not permit this adoption of new and innovative technologies.

There is mention of concerns for the possible impact greenhouses may have on the future soil-based farming of a parcel; there is no mention of the science behind those possible impacts. Greenhouse owners, when looking for land to purchase for a greenhouse expansion look for a large parcel of flat land with uncomplicated access to services such as water and natural gas and also proximity to market. The land is then laser leveled with minimal topsoil disruption. Concrete post supports and work pathways are poured in the greenhouse and slabs in the grading and packing areas and the warehouse. This concrete allows for the movement of equipment for production and harvesting needs as well as safeguards the food safety standards in the grading and packing areas and the warehouse. Food Safety requirements include a need for a cleanable surface that also ensures the ability to control rodents. This certainly allows the topsoil to be available for future soil-based farming, the soil has not been removed and the concrete can be removed if the greenhouse is ever decommissioned.

There is a discussion in the staff report of impermeable surfaces having an impact on storm water drainage, many municipalities require a storm water management plan when planning to build a greenhouse. This storm water management plan addresses on-site drainage and any possible impacts to the agricultural capability of the soil surrounding the greenhouse.

The staff report mentions that if a farmer wishes to construct a building that would not comply with the new bylaw amendment they could apply to rezone the property, which would be reviewed by staff and brought forward to Council for consideration. The BCGGA respectfully submits that the permitting process for a new greenhouse is onerous enough already without adding another unnecessary layer.

The BCGGA strongly supports the conclusions of the Richmond Agricultural Advisory Committee that the Bylaw Amendments should not be passed. We believe that the Bylaw Amendment will not solve the challenges faced by Richmond (and other municipalities) with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland with the impending and





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ASSOCIATION

uncertain Federal Legislation. We do not believe this bylaw amendment is necessary to protect soil based agriculture for the future.

There needs to be more discussion and consultation with agricultural stakeholders to help shape the future of regulations that affect sustainable agricultural land use.

The BC Greenhouse Growers' Association and its' members remain available to take part in any further discussion.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Armand VanderMeulen', with a long horizontal flourish extending to the right.

Armand VanderMeulen  
President, Chair, BC Greenhouse Growers' Association

Cc. Premier John Horgan  
Honourable Lana Popham, Minister of Agriculture  
Honourable Carole James, Minister of Finance  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition  
Jennifer Dyson, Chair, Agricultural Land Commission

John F. Moonen, B.Comm., LL.B.  
John Moonen & Associates Ltd.  
**Government Relations, Communications, Public Affairs**  
604.921.6433; 604.786.7654  
[johnmoonen@telus.net](mailto:johnmoonen@telus.net)  
[www.publicaffairsnetwork.com](http://www.publicaffairsnetwork.com)

June 18, 2018

Mayor and Council, City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Attn: City Clerk

Via email: [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca)

Your Worship and Members of Council.

I wish to contribute my perspective on your proposal to prohibit or restrict concrete slab floors in farm buildings and greenhouses. I offer my views as someone who has spent over 25 years dealing with ALR matters - advising farmers, landowners, local governments and the Agricultural Land Commission itself on issues concerning the ALR. And as a strong supporter of farmland preservation.

As you know the ALC is charged with preserving BC's limited supply of precious farmland. It is perhaps the one government agency at any level with the strongest record of standing up for BC's agricultural land. And it has been doing so for over 40 years. Often in the face of opposition from politicians from all over BC, including several Premiers. It is doing the job it was given 45 years ago and is doing it well.

And yet over its entire history the Commission has never banned greenhouses or farm buildings, or attempted to dictate what kind of flooring a farmer should use. Quite the opposite, in fact. Along with the Ministry of Agriculture the ALC has supported a farmer's right to choose whether to build a greenhouse and what kind of flooring he wants/needs, reflecting statutes like the Farm Practices Protection (Right to Farm) Act and the Local Government Act which have specific provisions preventing municipalities from interfering in such decisions.

The ALC has never suggested a concrete floor ban like the one before you tonight. Nor has any other municipality in BC, including those with a record – unlike Richmond's - of not standing up for the ALR.

So why is Richmond doing this now, when the ALC and no other municipalities are? Is there some evidence for the claim – made in the staff report – that banning concrete slab floors is necessary for the “protection of high-quality soils for soil-based agriculture...”? No such evidence was presented to support this – or that high-quality soils on which structures are built cannot subsequently be used for soil-based farming after a concrete floor is removed.

This is not surprising. After all, how many greenhouses with concrete slab floors have been decommissioned in Richmond to test this theory? None. Or anywhere else in the Lower Mainland? How many agronomists have testified that soil under a farm building or greenhouse covered in concrete can never again be used for soil-based farming? If there are have been, why have none appeared in the staff report? Or presented to the AAC meeting in May?

Taking this step could cause all sorts of negative consequences:

1. You'll be effectively limiting a farmer's right to choose what's best for his/her farm and business.
2. You'll be upsetting scores of farm families and the businesses/farmworkers that rely on them.
3. You'll be driving future farm operators away who need concrete slabs – for worker safety, because their buyers demand it, for bio-security and food safety reasons, for greater water recapture, for higher productivity, even to protect the soil underneath by preventing pesticides and herbicides from leaking out.

If you approve this proposal tonight you'll also be doing something that goes against the City's own OCP objectives and its Agricultural Viability Strategy, which contain the following:

1. Richmond will ensure the ALR is available for both soil bound and non-soil bound agriculture (Part 7.0, Section 7.1, Objective 1)
2. City bylaws will be consistent with the ALC Act, regulations, policies and orders which, as noted, have never banned concrete slabs (Section 7.1, Objective 1)
3. Richmond farmland should be used to support a "competitive, diverse and flexible agricultural industry" – how can it be competitive, diverse and flexible when you ban some of the structures it may need in the future?
4. Richmond bylaws should not impose unnecessary restrictions but should help Richmond farmers remain competitive and be "responsive to changing times".

The times are changing. Greenhouses and large farm buildings are going to become more necessary and sophisticated than ever in the years ahead. Many will be moving away from dirt floors to remain in business. And since greenhouses can produce 15 or even 20 times the amount of food that can be grown on the same amount of open field, they can actually preserve agricultural land by making better use of fewer acres.

With respect, this idea should be voted down.

Yours sincerely,

*John Moonen*



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# **Greenhouses in the Arctic Will Reduce Food Insecurity in Canada's North**

**Greenhouses grow food at a fraction of what it would normally  
cost.**

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TWEET



Samar Warsi

Jul 26 2017, 8:41am



Growing North's Greenhouse in Naujaat, Nunavut. Image: Growing North

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In Nunavut, in Canada's Arctic, shoppers **pay** \$12.44 for for a kilogram of celery, almost four times more than the \$3.38 national average, and \$6.90 for a kilogram of potatoes. It's just one of many examples of food inaccessibility in the region, which severely affects **18.5** percent of Nunavut households, a problem the government is addressing by investing \$13.8 **million** per year to support isolated Northern communities.

To address this problem, not-for-profit Growing North built a greenhouse in the Inuit hamlet of Naujaat in September 2015 to increase accessibility to fresh food.

The greenhouse has the capacity to produce 13,250 lbs of food last year for the local community of 1,082 people, an amount that "could feed just over 50 percent of the Naujaat population Health Canada's daily recommended amount of produce," explained Stefany Nieto, co-founder of Growing North. With the success of the Naujaat greenhouse, the organization is expanding to Arviat, Nunavut's third-largest community, in August.

"It is completely unacceptable that many northern and Indigenous families cannot afford to put healthy food on the table," the Office of the Minister of Indigenous and Northern Affairs Canada told Motherboard in an email. In an effort to "support families and hunters - and improve access to country foods," in 2016, the Canadian government invested an additional \$64.5 million over five years, and \$13.8 million per year ongoing, and have now expanded full subsidies to an additional 37 isolated northern communities. Investments in local greenhouses could help grow fresh food and make it more accessible.



Bright Agrotech's ZipFarm System. Image: Bright Agrotech

Growing North is exploring alternative and sustainable ways of feeding Canada's north by using some of the latest in vertical farming techniques.

What was a once far-fetched idea is now a sustainable option for providing food to a growing population. Vertical farming allows farmers to have a 365-day season without having to use pesticides or worry about traditional farming concerns like sunlight, rain, or drought.

Over the last ten years, a number of companies have popped up around the world using old warehouses and other unconventional urban spaces to grow fresh produce. Many of these farms operate in densely populated places like China, Japan, Belgium, and the United States. The largest floor-to-ceiling farm is

currently in New Jersey at nearly **70,000 square feet**. And the phenomenon is only going to get bigger. By some estimates, the vertical farming industry is **projected to be worth USD \$13 billion** by 2024.

Bright Agrotech, a Wyoming startup, allows small urban and suburban farmers to grow crops through its vertical hydroponic farming systems. Hydroponic refers to soilless growing, in which the plants are grown using only nutrient-rich water. The water flows across the root structure and is taken up by the plants. Bright Agrotech's systems, which focus on greens and herbs is being used in Growing North's Naujaat greenhouse.

"Nunavut has the highest rate of food insecurity in Canada," Nieto told Motherboard in an interview. The organization estimates the price reductions on fresh produce grown in their greenhouses to be anywhere from 50 to 70 percent, depending on whether the produce is sold to local grocers or sold directly to consumers through places like the farmer's market.

"You can face food insecurity even living in a city like downtown Toronto if there is not a grocery store for miles around," explained Ben Canning, co-founder of Growing North.

Food inaccessibility persists in northern Canada, in large part, due to the cost of getting food to the region. Fresh food has to be flown in from the south. Each community faces its own challenges. Some are only accessible by road and not by air, which adds time and money. "Whether it's food or construction goods that need to be shipped in, the farther north you go, the longer the supply chain gets and the more it costs. Even a lot of our food consumed in Toronto is shipped in. To get to the North, they spend an extra two weeks in cargo freights, craters, and planes," said Canning.



Growing North's current greenhouse is 75 percent hydroponic and 25 percent soil-based agriculture. The hydroponic system can grow any herb as well as greens like lettuce, kale, collard greens and swish chards. The agricultural side grows vegetables like radishes, potatoes, and carrots.

But the cost to construct these systems is extremely high—much higher than soil-based farming. For example, the 1300-square-foot dome shaped greenhouse in Naujaat cost Growing North about \$100,000. For poor communities, especially in developing countries, vertical farming can be unaffordable. In addition to the initial costs, there are other ongoing expenses related to **paying tech-savvy workers** needed to run the farms. Currently, Growing North is working on lowering that cost through in-house research and development which would make project implementation in smaller communities with limited access to funds, possible.

Still, local greenhouses may be a viable answer to the problem of food accessibility in the north.

***Correction:*** *An earlier version of this story said the greenhouse produced 13,250 lbs of food last year, but that number actually represents its full capacity. The story has been updated.*

**M**

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