

Good afternoon

My name is Sandra McBurney. I am currently registered owner as executor of the Will of my mother, Lidia DeConti, of the properties at 4531 Boundary Road and 4480 Thompson Road. I am here representing My brother, Peter DeConti and sister, Lily Meneghetti. We are the beneficiaries of these properties.

On January 19 of this year, my brother and I attended the public hearing meeting for OCP amendment bylaws, pertaining to the proposed update of the ESA map. At that meeting council referred the re-evaluation of the ESA mapping back to staff regarding our properties and the area between Thompson and Boundary Roads south of Thompson Gate.

On Friday May 1 I received an email from Russell Nelson, manager of community planning stating that staff have completed the re-evaluation and recommending that council receive the report for information and forgo any further action until the third referral that directed staff to review the potential removal of ESAs on all private properties city wide later this year.

The report dated April 17 to planning committee from Wayne Craig, General manager planning and development summarized that the ESA polygons on our properties contain an established native tree canopy of

native understory plant species consistent with the definition of a terrestrial ESA and as such recommended to be retained in their current configuration and that a report of all privately owned ESA polygons city wide will be brought forward for Council's consideration later.

The report states that the native tree storey and understory plant species present on our properties are red-osier dogwood, common snowberry, red alders with minor components of black cottonwood and cedar mixed in.

I would like to point out that these types of plants are growing all over Richmond residential and non residential properties yet the City has arbitrarily chosen to assign the ESA designation to only 3 residential streets in Richmond, Thompson and Boundary roads and I Beckwith road in north Richmond. These plants are all native to British Columbia and thrive in Richmond's wet soil. They are highly adaptable plants and are perfectly suited to Richmond's landscape.

I acknowledge that after many emails, phone calls and meetings with staff and council members since 2017, city staff finally visited our properties last May and reduced the ESA designation by about 2/3s finally agreeing that that portion was all invasive blackberry bushes. The remaining 1/3 (red osier dogwood, common snowberry, etc) have almost all grown on the property since 2017. I

would like to point out that the first comment made by both your planning department representative and the environmental consultant was “there’s lots of blackberry bushes growing here”. Reliance on satellite imaging instead of an in person visit, has resulted in many hours of extra staff and council time. It should be noted that satellite imagery alone is not sufficient for decisions that have far reaching consequences.

We have been told by city that ESA is a provincial government mandate.

You state in your report that as outlined in the local government act, an OCP must include policy statements and map designations for land that the local government deems to be environmentally sensitive to development. It also states that the local government act does NOT dictate where and how this specifically applies to municipalities, therefore council retains discretion to determine WHERE AND HOW this statutory direction is enacted. Richmond has CHOSEN to arbitrarily make this designation to less than a handful of residential properties.

Almost every phone call or meeting I have had with staff, I have been told that esa does not impede new construction or development. While this may be true in the actual construction or development, it does come at a cost to those who own such designated properties. The buyer is not only required to provide financial costs for

remediation but must also spend extra time having this remediated with the city. Thus the sale of the property is severely jeopardized and often at a reduced price.

The April 17 report refers to a 120 unit townhouse complex at 4300 Thompson road and 4337 Boundary Road. It states that the esa area was remediated through a combination of on site and off site compensation. When I spoke to the planning department in 2017, I was told that the esa compensation for these properties by the developer was 1188 trees and 6475 shrubs and that was after taking into consideration that 35% of the esa was non-continuous "upland forest" with the majority of the trees nearing their end of life and being subject to blow down. I asked the person I spoke to if they could give me a dollar figure. They could not give me a dollar figure but said it would be hundreds of thousands of dollars and that the compensation to the city is always equal to or greater than the value of the esa inventory.

We request that council rescind the total esa designation from our properties at this time and reconsider the transparency and fairness of this entire process. ALL Richmond residential property owners whether they live in Hamilton, Broadmoor, terra nova or anywhere in Richmond should be treated equally.

As far as our properties are concerned, another report at a later date is not necessary. Staff and council have all

the information. The properties we own should have the entire ESA designation rescinded.

**We believe that, at a minimum, all private residential property owners should be formally and directly notified by City staff if their property is being considered for or has been assigned an ESA designation. Such determinations should be based on physical, on-site inspections rather than reliance on satellite imagery alone, and owners should be given a clear and accessible opportunity to challenge or have the designation reconsidered. None of these fundamental steps were taken in our case. The absence of direct communication, proper verification, and procedural fairness has resulted in significant and unnecessary time, effort, and stress on us.**

Thank you for your consideration,

Sandra McBurney