



To: Planning Committee **Date:** April 17, 2026
From: Wayne Craig **File:** 01-0100-30-ACEN1-
General Manager, Planning and Development 01/2025-Vol 01
Re: **Referral Response: Re-Evaluation of the Environmentally Sensitive Areas (ESAs) Mapping for the Thompson and Boundary Roads Area of Hamilton**

Staff Recommendation

That the report titled “Referral Response: Re-Evaluation of the Environmentally Sensitive Areas (ESAs) Mapping for the Thompson and Boundary Roads Area of Hamilton” dated April 17, 2026, from the General Manager, Planning and Development, be received for information.

Executive Summary

This report provides information in response to two referrals directing staff to review the Environmentally Sensitive Areas (ESAs) mapping in the 2050 Official Community Plan for private properties between Thompson and Boundary Roads, and south of Thompson Gate in the Hamilton area. In response, staff undertook, with the assistance of a Qualified Environmental Profession, a re-evaluation of the ESA polygons in the study area.

The re-evaluation concluded that the ESA polygons contain an established native tree canopy and presence of native understory plant species consistent with the definition of a terrestrial ESA (e.g., forested) in the City’s ESA Development Permit Area policy and are recommended to be retained in their current configuration in the ESA mapping. A separate report responding to a referral relating to the potential removal of all ESA polygons city-wide that are privately owned will be brought forward for Council’s consideration later. It is recommended that this report be received for information.

Staff Report

Origin

This report provides a response to two separate referrals related to the re-evaluation of the Environmentally Sensitive Area (ESA) mapping, which can be found in the 2050 Official Community Plan (OCP), for an area between Thompson and Boundary Roads, south of Thompson Gate, in the Hamilton area (Attachment 1).

The referral from Council [Referral #1] occurred following a public hearing on January 19, 2026, and reads as follows:

“That staff look at the Environmentally Sensitive Area on the property that runs from Thompson Road to Boundary Road (4531 Boundary Road and 4480 Thompson Road), and report back.”

The second referral from Planning Committee [Referral #2] was endorsed on January 20, 2026, and reads as follows:

“That staff investigate the current ESA designations of the townhouse designated properties on the west side of Boundary Road from Westminster Highway to Thompson Road, to Highway 91, and report back.”

A third and related referral occurred following a public hearing on January 19, 2026, which directed staff to review the potential removal of ESA designations on all private properties. A response to that referral will be presented to Council later.

This report supports Council’s Strategic Plan 2022-2026 Focus Area #2 Strategic and Sustainable Community Growth:

Strategic and sustainable growth that supports long-term community needs and a well-planned and prosperous city.

This report supports Council’s Strategic Plan 2022-2026 Focus Area #5 A Leader in Environmental Sustainability:

Leadership in environmental sustainability through innovative, sustainable and proactive solutions that mitigate climate change and other environmental impacts.

This report supports Council’s Strategic Plan 2022-2026 Focus Area #6 A Vibrant, Resilient and Active Community:

Vibrant, resilient and active communities supported by a wide variety of opportunities to get involved, build relationships and access resources.

Background

On February 9, 2026, Council adopted bylaws which updated key sections of Richmond’s OCP, including amendments to environmental protection mapping as well as selective revisions to policies and guidelines as they relate to ESAs including the following:

- updates to the City’s ESA Map, which identifies areas that are likely to contain tangible ecological and biodiversity attributes;
- revisions to the associated ESA Development Permit Area (DPA) objectives, exemptions, and guidelines; and
- procedural clarifications regarding when a Qualified Environmental Professional (QEP) is required.

The OCP ESA DPA objectives, exemptions and guidelines provide a pathway for development applicants to identify, evaluate and verify ecological and biodiversity attributes, and determine outcomes that fully accommodates both development potential and the preservation of ESAs through retention, restoration and compensation measures.

Legal Framework for ESAs

As outlined in the *Local Government Act* (LGA), an OCP must include policy statements and map designations for land that the local government deems to be environmentally sensitive to development (e.g., steep slopes, shorelines, forested areas, wetlands). The LGA provides further clarification that indicates that Council, in an OCP, may include policies relating to the preservation, protection, restoration and enhancement of the natural environment, its ecosystems and biological diversity (e.g., ESAs).

The LGA further states that Council may designate a DPA for the protection of the natural environment, its ecosystems and biological diversity. To establish a DPA, the DPA must include objectives and guidelines that enable said objectives and may include a list of exemptions from and/or qualifications to the DPA requirements. The LGA does not dictate where and how this specifically applies in municipalities; therefore Council retains discretion to determine where and how this statutory direction is enacted.

To provide some clarity and assist local governments with the definition of an ESA, the Province released a document titled *Environmental Best Management Practices for Urban and Rural Land Development* (2004) which defines ESAs as being a site or area:

“that already has, or with remedial action could achieve, desirable environmental attributes. These attributes contribute to the retention and/or restoration of wildlife habitat, soil health and stability, water cleanliness, retention or recharge, vegetative cover and similar vital ecological functions. Environmentally sensitive areas range in size from small patches to extensive landscape features [both aquatic and terrestrial]. They can include rare or common habitats, plants and animals. Environmentally sensitive areas also include hazard lands”.

ESAs in Richmond

The intention of the ESA mapping, related policies, and ESA DPA guidelines is to practically and appropriately preserve, restore, and enhance ecological and biodiversity attributes, spaces and systems throughout areas of Richmond while balancing and accommodating development potential in accordance with the underlying OCP land use designation and associated zoning. Richmond’s approach for ESAs includes two primary program components, to comply with provincial requirements:

- *ESA Inventory Map*: The OCP's ESA Map identifies areas with potential ecological and biodiversity value based on available information, including aerial interpretation and field observations. The mapping provides early identification of ESAs and informs the requirement for site assessments to verify ecological conditions and ensure appropriate protection and management.
- *ESA DPA policies and guidelines*: The ESA DPA objectives, exemptions, and guidelines support the management of ESAs. Through the development process, site assessments are used to confirm ecological attributes and functions, and to guide appropriate measures, including avoidance, restoration that demonstrates an enhancement/net beneficial gain to the ESA, and, where necessary and appropriate, mitigation such as compensation measures. Any consideration of ESA boundary refinement is informed by detailed biophysical assessment and must align with OCP objectives.

ESAs are an important part of Richmond's multifaceted urban nature conservation approach to land use planning, which is part of a larger network of environmentally sensitive lands, including areas designated in the 2050 OCP Land Use Map as Conservation Area (e.g., Sturgeon Banks), Richmond's Riparian Management Areas (e.g., water corridors, marine areas), and areas that are identified in the Ecological Network Management Strategy (e.g., city parks, greenways, ecological corridors).

Analysis

Context

The properties subject to the referrals from Council and Committee are bound by Thompson and Boundary Roads, south of Thompson Gate and north of the Highway 91A northbound on ramp, in Hamilton (Attachment 1). The subject area is characterized in recent history as an area with large, rural, single-family, fee simple lots with a wide range of natural attributes and features. The area is designated in the Hamilton Area Plan as Neighbourhood Residential which allows higher density townhouse development and accommodates three storey buildings.

Development Applications

In the past several years, there has been new construction in this area and development applications for townhouse development (Attachment 2). The first townhouse development project that was recently complete and granted occupancy, includes a 120-unit townhouse complex at 4300 Thompson Road and 4337 Boundary Road (RZ 22-019201). The site previously included an ESA area that was remediated through a combination of on-site and off-site compensation and in-situ restoration. Off-site compensation was directed towards ecological restoration of city-owned parkland located between Highway 91A and Thompson Road (Hamilton Highway Park). The on-site restoration and landscaping, along with securities for the off-site compensation, was secured through legal agreements as part of the development permit process. The townhouse development potential achieved the highest density supported for the site by the OCP.

More recently, there is a current 'in-stream' development application that has requested to rezone 4540, 4560 Thompson Road and 4551, 4571 Boundary Road to accommodate a 76-unit townhouse development (RZ 22-019201). Based on the current development review and submissions provided by the applicant to date, including an ESA assessment prepared by a QEP, the management of these ESAs for this proposal are pursuing a combination of in-situ

restoration, as well as on-site and off-site compensation and ecological restoration. This application, which intends to achieve the density envisioned in the OCP, will come forward to Council for consideration at completion of its review.

Re-Evaluation

Based on the referrals, the re-evaluation of the study area primarily focused on vegetation. Other ecological components, including wildlife and wildlife habitat (including species at risk), soils, peat, groundwater systems, and broader ecological network considerations, were not assessed. These components should be evaluated through a comprehensive, site assessment prepared by a QEP as part of the development process which would be assessed on existing ESA Development Permit guidelines.

To initiate the ESAs mapping re-evaluation, letters were sent to owners/residents for each of the ten (10) properties as well as adjacent properties, alerting them of the purpose of the request for access. Site visits were conducted by the QEP and their team in February 2026 which included conducting on-site investigations. No vegetation removal nor ground disturbance of any kind was performed as part of this city-led field reconnaissance exercise.

To facilitate and communicate the findings of the re-evaluations for the ten (10) properties, the ESA study area has been divided into two (2) 'Areas', Referral #1 and Referral #2. The summary of the outcomes of the re-evaluation is described below.

Referral #1 -- 4480, 4500 Thompson Road and 4531, 4551 Boundary Road

Referral #1 references two properties, 4480 Thompson Road and 4531 Boundary Road where there are two ESA polygons. The first one to the west straddles 4480 and 4500 Thompson Road whereas the second ESA polygon to the east also straddles 4480 and 4500 Thompson Road as well as 4531 and 4551 Boundary Road. For the purposes of clarity, this Referral #1 sub-study area will include an overview summary of both ESAs and the surrounding spaces for all four properties.

Analysis of the field data for these two ESAs in Referral #1 sub-study area were observed to have a defined native tree canopy complemented with native understorey plant species. The established tree canopy contained red alders with minor components of black cottonwood and cedar mixed-in. Cottonwood trees are a native species to Richmond and support and provide habitat and an inter-dependency relationship for and with other native flora and fauna. Although environmental protection efforts often focus greater emphasis on the retention of particular types of trees, the concept of ESAs recognizes that trees are just one environmental attribute of a larger series of ecosystems. Future detailed discussions with development applicants can explore replacements of such tree types (e.g., black Cottonwood) if alternate native species add to improved ecological and biodiversity restoration outcomes, climate change responsiveness, and in balance with other considerations such as interconnectivity of ecosystems, public safety and human well-being.

Understorey vegetation was present throughout much of the ESAs in this area and consisted primarily of red-osier dogwood and common snowberry. While the understory includes some invasive species such as Himalayan blackberry, it continues to provide ecological value by contributing to structural complexity that supports habitat provision and connectivity with the broader ecological network. The presence of an established native tree canopy, together with

both native and invasive understory vegetation, reflects an intact, multi-layered system that is indicative of a functioning terrestrial ecosystem. These characteristics are consistent with the definition of a terrestrial ESA (e.g., forested) in the City's ESA DP policy and support retention of the ESAs in their current configuration.

Referral #2 – 4540 to 4600 Thompson Road and 4571 to 4699 Boundary Road

Referral #2 refers to the remaining properties in the sub-study area that have an ESA overlay, including 4540, 4560, 4580 and 4600 Thompson Road, and 4571, 4611, 4693, and 4699 Boundary Road. This includes the four properties that are under review for a rezoning application (RZ 22-019201). Outside of that rezoning application, this area has one ESA polygon that is situated over multiple properties. The most substantial portion of that ESA polygon is located on 4611 and 4699 Boundary Road, with modest remainders located on 4693 Boundary Road and 4580 and 4600 Thompson Road. The ESA extends north beyond these subject properties at 4571 Boundary Road, which is subject to a current development application (RZ 22-019201).

Similar to the ESAs in the Referral #1 sub-study area, analysis of the field data for the ESAs in Referral #2 sub-study area were observed to have a defined native tree canopy complemented with native understorey plant species. The established tree canopy contained red alders with minor components of black cottonwood and cedar mixed-in, with the understory consisting primarily of red-osier dogwood and common snowberry.

The re-evaluation of Referral #2 sub-study area identified some Himalayan blackberry within the ESAs. Similar to Referral #1, the presence of an established native tree canopy, together with both native and invasive understory vegetation, reflects an intact, multi-layered system that is indicative of a functioning terrestrial ecosystem. These characteristics are consistent with the definition of a terrestrial ESA (e.g., forested) in the City's ESA DP policy and support retention of the ESAs in their current configuration. The current development review (RZ 22-019201) for most of this ESA is being undertaken by a QEP with recommendations to pursue a combination of in-situ restoration, as well as on-site and off-site compensation and ecological restoration.

For the remaining ESA not under a current development review, any identified invasive species or noxious weeds can be managed, through an ESA DP exemption, to ensure there aren't long-term consequences to native trees and native understory vegetation as supported by recent changes to the ESA DP guidelines. If a development application is made to develop those properties, a biophysical evaluation would provide more information and an integrated analysis to guide preservation, restoration and compensation measures.

Maintain ESA Polygons

Staff recommend that the ESA polygons be maintained for the following reasons:

- The presence of an ESA on properties within the study area is not expected to limit development potential under the OCP, Hamilton Area Plan, or Zoning Bylaw. This is demonstrated by the development application experiences of a recently completed townhouse project in the north portion of the study area and the preliminary experiences of an 'in-stream' townhome development application. Retention, enhancement, as well as on-site and/or potentially off-site compensation have been and would continue to be considered as part of any development application.

- A further report on privately owned ESAs city-wide will be presented to Council later. This work will incorporate an overview, analysis and comparisons of other local government approaches to ESA management and could include proposed policy updates to the OCP. Deferring decisions on ESA mapping in the Thompson and Boundary Road area until that time would support a more consistent, city-wide approach.

The value of maintaining the ESA polygon is that during the development review process a complete ESA evaluation not only examines vegetation, but incorporates wildlife and wildlife habitat, (including species at risk), soil, peat, and groundwater ecosystems, and ecological network (including connectivity for biodiversity) analysis. This type of review would be assessed on existing ESA Development Permit guidelines and is best considered in concert with development site planning and design exercise that recognizes and identifies a comprehensive and integrated response to both the natural and built environments.

Budgetary Implications

None.

Conclusion

This report presents a response to two Council referrals for staff to re-evaluate ESAs for privately owned properties between Thompson and Boundary Roads, south of Thompson Gate, in the Hamilton neighbourhood area. Following further review by a qualified environmental professional, along with other support professionals, staff recommend maintaining the ESA polygons as they are currently identified in the ESA map of the recently updated 2050 OCP and consider those polygons as part of a city-wide review which will be conducted later. Staff recommend receiving this report for information.

Respectfully submitted,

John Hopkins, Director, Policy Planning

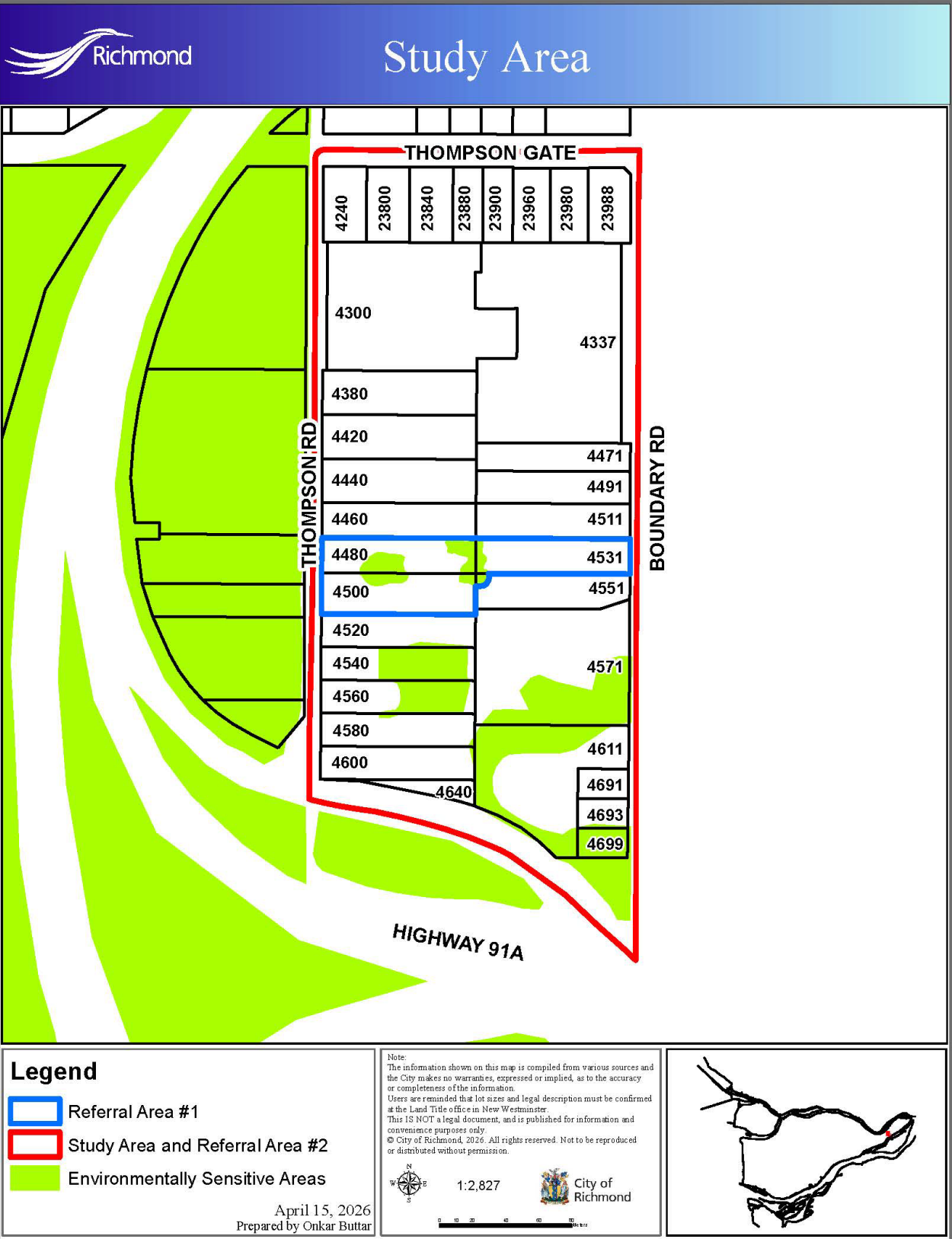
Report Contributors

This report was prepared by Russell Nelson, Manager, Community Planning and reviewed by Development Applications, Climate & Environment, and Parks Services.

Endorsed by Serena Lusk, CAO

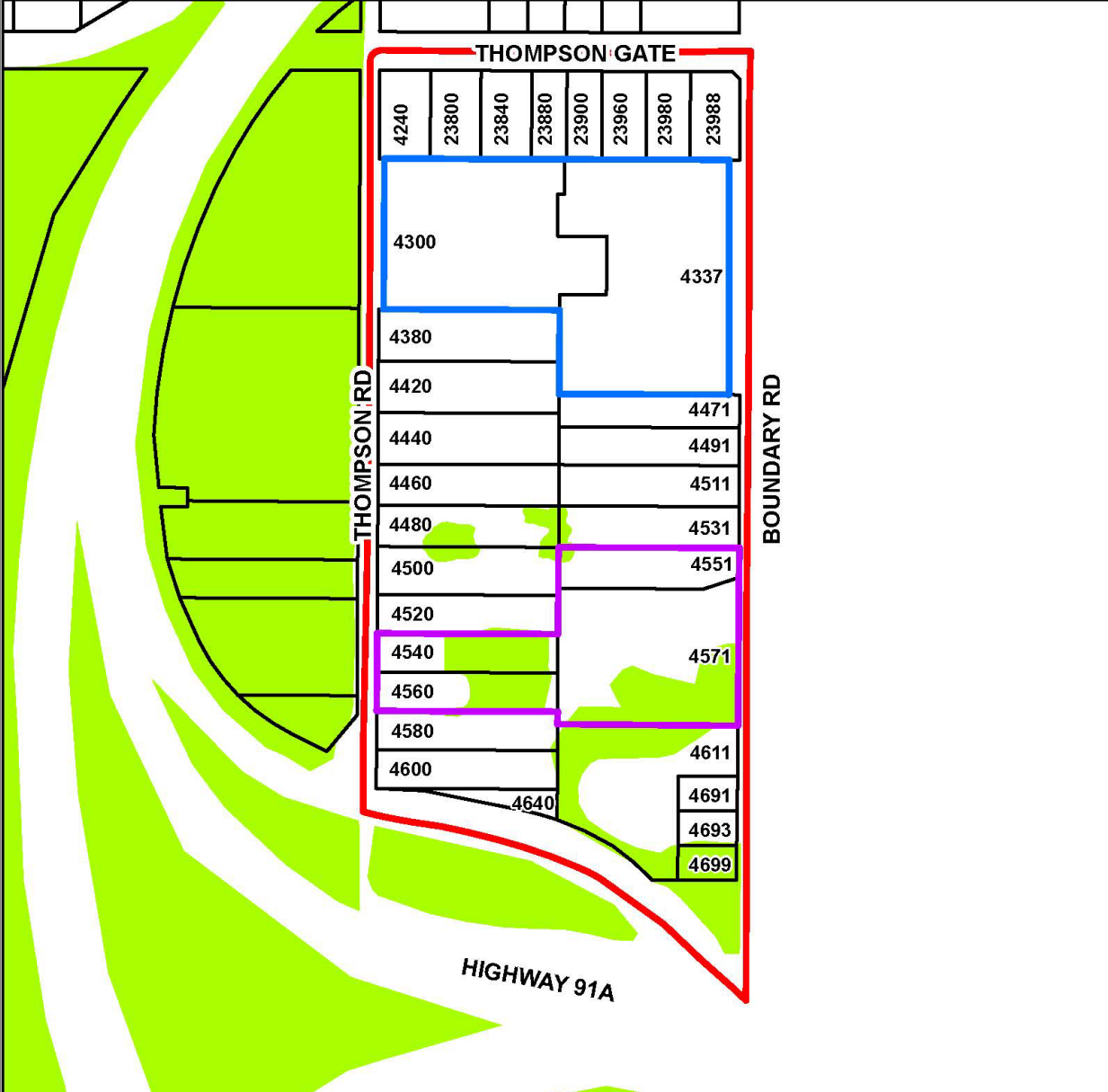
Attachment 1: Study Area

Attachment 2: Development Applications





Development Applications



Legend

- Study Area and Referral Area #2
- Environmentally Sensitive Areas
- Completed Development Application (RZ 2015 713048)
- In Circulation Development Application (RZ 2022 019201)

April 15, 2026
Prepared by Onkar Buttar

Note:
The information shown on this map is compiled from various sources and the City makes no warranties, expressed or implied, as to the accuracy or completeness of the information.
Users are reminded that lot sizes and legal description must be confirmed at the Land and Title office in New Westminster.
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