



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

