

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

Mayor and Councillors

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

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