

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.

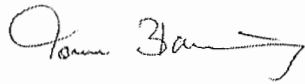
I operate three greenhouses at UFV and one at my own nursery. At UFV, one has all concrete floors, two have soil floors. As an industry we struggle with uneven floors in the non-concrete floors. I cannot afford a concrete pad at my own small greenhouse. Pots with plants keep falling over, as soil is 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 19th 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 300m² (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.

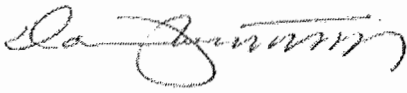
D. Other Relevant Comments

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

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; 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.

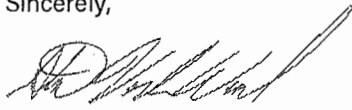
By proactively working together, we can achieve mutually beneficial policies, regulations and programs that support the sustainability and growth of B.C.'s agriculture industries. BCAC is available to take part in any opportunity for future collaboration on this matter.

P: 604.854.4454
TF: 866.522.3447
F: 604.854.4485

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

bcac.ca

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 , 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 32nd Ave
Surrey, BC V3Z 0R7
PH: 604 531-5262
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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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