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Mayor and Council, City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Attn: City Clerk

Via email: [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca)

Your Worship and Members of Council.

I wish to contribute my perspective on your proposal to prohibit or restrict concrete slab floors in farm buildings and greenhouses. I offer my views as someone who has spent over 25 years dealing with ALR matters - advising farmers, landowners, local governments and the Agricultural Land Commission itself on issues concerning the ALR. And as a strong supporter of farmland preservation.

As you know the ALC is charged with preserving BC's limited supply of precious farmland. It is perhaps the one government agency at any level with the strongest record of standing up for BC's agricultural land. And it has been doing so for over 40 years. Often in the face of opposition from politicians from all over BC, including several Premiers. It is doing the job it was given 45 years ago and is doing it well.

And yet over its entire history the Commission has never banned greenhouses or farm buildings, or attempted to dictate what kind of flooring a farmer should use. Quite the opposite, in fact. Along with the Ministry of Agriculture the ALC has supported a farmer's right to choose whether to build a greenhouse and what kind of flooring he wants/needs, reflecting statutes like the Farm Practices Protection (Right to Farm) Act and the Local Government Act which have specific provisions preventing municipalities from interfering in such decisions.

The ALC has never suggested a concrete floor ban like the one before you tonight. Nor has any other municipality in BC, including those with a record – unlike Richmond's - of not standing up for the ALR.

So why is Richmond doing this now, when the ALC and no other municipalities are? Is there some evidence for the claim – made in the staff report – that banning concrete slab floors is necessary for the “protection of high-quality soils for soil-based agriculture...”? No such evidence was presented to support this – or that high-quality soils on which structures are built cannot subsequently be used for soil-based farming after a concrete floor is removed.

This is not surprising. After all, how many greenhouses with concrete slab floors have been decommissioned in Richmond to test this theory? None. Or anywhere else in the Lower Mainland? How many agronomists have testified that soil under a farm building or greenhouse covered in concrete can never again be used for soil-based farming? If there are have been, why have none appeared in the staff report? Or presented to the AAC meeting in May?

Taking this step could cause all sorts of negative consequences:

1. You'll be effectively limiting a farmer's right to choose what's best for his/her farm and business.
2. You'll be upsetting scores of farm families and the businesses/farmworkers that rely on them.
3. You'll be driving future farm operators away who need concrete slabs – for worker safety, because their buyers demand it, for bio-security and food safety reasons, for greater water recapture, for higher productivity, even to protect the soil underneath by preventing pesticides and herbicides from leaking out.

If you approve this proposal tonight you'll also be doing something that goes against the City's own OCP objectives and its Agricultural Viability Strategy, which contain the following:

1. Richmond will ensure the ALR is available for both soil bound and non-soil bound agriculture (Part 7.0, Section 7.1, Objective 1)
2. City bylaws will be consistent with the ALC Act, regulations, policies and orders which, as noted, have never banned concrete slabs (Section 7.1, Objective 1)
3. Richmond farmland should be used to support a "competitive, diverse and flexible agricultural industry" – how can it be competitive, diverse and flexible when you ban some of the structures it may need in the future?
4. Richmond bylaws should not impose unnecessary restrictions but should help Richmond farmers remain competitive and be "responsive to changing times".

The times are changing. Greenhouses and large farm buildings are going to become more necessary and sophisticated than ever in the years ahead. Many will be moving away from dirt floors to remain in business. And since greenhouses can produce 15 or even 20 times the amount of food that can be grown on the same amount of open field, they can actually preserve agricultural land by making better use of fewer acres.

With respect, this idea should be voted down.

Yours sincerely,

*John Moonen*