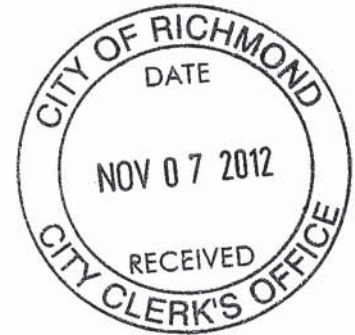


To Public Hearing
Date: <u>NOV 19 2012</u>
Item #: <u>3</u>
Re: <u>BYLW 9000</u>

ECOWASTE

November 6, 2012

City of Richmond
City Clerk's Office
6911 No. 3 Road
Richmond, BC V6Y 2C1
Attn: David Weber, Director



Dear Sir:

RE: OFFICIAL COMMUNITY PLAN – ECOWASTE INDUSTRIES LANDS

I am writing on behalf of Ecowaste Industries Ltd. in response to the City's request for further input into its Draft Official Community Plan ("OCP") with our request that the area consisting of Ecowaste's four properties described below be the subject of further study by the City:

- 150-acre parcel legally described as 1 SEC 15 BLK4N RG5W PL LMP 40687 and 2 SEC 15 BLK4N RG5W PL LMP 40687 (**Parcel 1**)
- 79-acre parcel legally described as SEC 21 BLK4N RG5W PL Part N ½ (**Parcel 2**)
- 62-acre parcel legally described as H SEC 28 BLK4N RG5W PL 19680 (**Parcel 3**)
- 16-acre parcel legally described as SEC 10 BLK4N RG5W PL 723 Parcel A Except Plan 9341, EXP 723 (**Parcel 4**).

These parcels total over 300 acres. They are located in a very dynamic part of Richmond adjacent to Ecowaste's significant industrially-zoned lands (currently being developed), the Fraser Port Lands, key transportation corridors and a broad mix of other uses. Ecowaste believes these parcels warrant further study because of their unique size and strategic location, and because of:

1. the wide variety of past and present uses – and the potential for future uses of properties in this area;
2. the long history of Agricultural Land Commission (ALC) decisions allowing peat removal, landfill, industry, port, golf courses, transportation and other uses on these and other properties in the area;
3. the lack of significant farming activity in the immediate vicinity of our properties, except for the cranberry operation to the west and some farming to the north;
4. the recent designation of parts of our four properties as ESA and its impact;

5. the extensive port development and emerging traffic changes in the area, including a new bridge extending Blundell Road from the east into the Ecowaste properties;
6. the pending industrial development on other Ecowaste properties adjacent to these four parcels;
7. the lack of other properties in Richmond of similar size to meet the City's long-term needs in a number of areas, including employment and,
8. the benefits of a comprehensive and integrated land use plan that incorporates agriculture, industry, recreation, port, transportation and other uses that serve the long-term needs of the City.

Ecowaste Industries Ltd.

Ecowaste is a wholly-owned subsidiary of Graymont Limited. Ecowaste has 40 years of waste management experience in the City of Richmond. From 1971 to 1986 the Company operated a municipal solid waste landfill on 160 hectares of land owned by the Fraser River Harbour Commission (FRHC). As that land became filled Ecowaste purchased 160 hectares of land next to the FRHC site where it currently operates a landfill for construction, demolition and excavation materials. Since 1992 Ecowaste has been involved in many waste management initiatives aside from construction and demolition waste land filling, including yard waste composting, partnerships for soil bioremediation, custom soil manufacturing utilizing Metro Vancouver biosolids and, more recently, wood processing to create biofuels.

Ecowaste's Properties in Richmond

Ecowaste has substantial property holdings in East Richmond totaling 476 acres (192 hectares). These properties are located between No. 6 and No. 7 Roads and between Granville Avenue and Williams Road.

Our properties are bordered by Port Metro Vancouver (PMV) lands to the east and southeast on which PMV operates a large industrial park and logistics facility. There is a CN Rail right-of-way bordering the southeast side of the Ecowaste property. Properties to the north, west and south of Ecowaste consist of a variety of uses, including vacant land, golf courses and agricultural use. The property is bisected by the Blundell Road right-of-way.

Two of Ecowaste's properties are zoned industrial (one 140-acre and one 29-acre parcel) and are currently in the process of being developed for industrial use. The remaining four parcels are zoned agricultural and are located within the Agricultural Land Reserve (ALR).

All four of Ecowaste's ALR parcels have historically been used for purposes other than farming. From 1948 to 1970 peat was harvested commercially from most of them.

Ecowaste's current landfill operation is on Parcel 1. The landfill has been operating since 1986 under certificates and licenses issued by provincial, regional and local governments including MR-04922 (BC Ministry of Environment), GVS&DD license #L-005 (for the landfill) and GVS&DD license #C-007 (for the compost operation). The use of the parcel as a landfill was encouraged by local, regional and provincial officials at the time because the former Fraser River Harbour Commission lands to the east - which had previously been used to deposit fill - were at capacity and a new landfill was required to meet the regional construction industry's need to dispose of construction and demolition (C&D) waste.

There will continue to be a need for this type of facility in the future as identified by Metro Vancouver in its new Integrated Regional Solid Waste and Resource Management Plan. While that Plan calls for significant improvements in recycling in the C&D sector it also recognizes the long-term need for Ecowaste's type of disposal facility in the region. We anticipate the landfill has several years of useful life remaining.

In 2007 Ecowaste acquired Parcel 2 on No. 6 Road. This parcel had also been mined for peat and was substantially depleted at the time of purchase. Its surface was irregular and lower than adjoining properties and many sections were under water. Ecowaste has been working to determine the best options for this property.

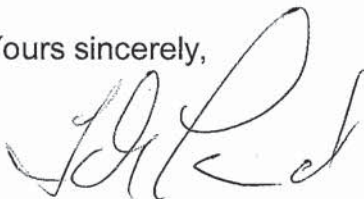
Parcel 3 is empty except for a broadcast facility currently under a long-term lease.

Parcel 4 is not currently leased but has historically been used for residential soil blending and bagging purposes.

In summary, for all of the reasons described above, we ask that the area consisting of Ecowaste's four ALR properties be the subject of further study by the City over the next 2 - 3 years, and that this be noted in the City's new Official Community Plan.

Thank you for your consideration.

Yours sincerely,



Thomas Land
Vice President & General Manager

cc: Joe Erceg, General Manager, Planning & Development
Wayne Craig, Director of Development
Holger Burke, Development Coordinator