

Andrea Hunter  
#101 - 4233 Bayview Street  
Richmond, BC V7E 6T7

July 18, 2016

City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1

Re: Richmond Official Community Plan Bylaw 7100, Amendment Bylaw 9589 and  
Richmond Zoning Bylaw 8500, Amendment Bylaw 9590 (ZT 16-735335)

Purpose of OCP Amendment:

To change the land use definition of "Maritime Mixed Use" (MMU) by retaining all  
existing Maritime Mixed Use (MMU) uses and adding child care use as a limited  
additional use.

Purpose of Zoning Text Amendment: To change the land use definition of "Steveston  
Maritime (ZC21)" zone to include child care as a limited additional use.

My name is Andrea Hunter. I was born and raised in Richmond, and am a resident of  
Steveston, BC. I live directly opposite the Onni Group Imperial Landing development at  
4080 and 4100 Bayview Street in Richmond, BC.

I am opposed to the proposed OCP Amendment and Zoning Text Amendment.

### **PETITION**

To my submission, I am attaching a petition signed by 21 households and 23 residents  
at 4233 Bayview St, Richmond, who oppose the proposed change in rezoning from  
Maritime Mixed Use by adding child care. These signatures represent 92% of all  
respondents at 4233 Bayview. The overwhelming opposition to the proposed  
amendment by local residents directly affected by the decision cannot be ignored.

### **THE APPLICANT**

Onni Group (hereafter referred to as Onni) did not apply for the rezoning to their  
property located on Bayview, rather the applicant is the City of Richmond. The Staff  
Report states that there is no financial impact from the proposed rezoning. This is  
incorrect. The rezoning will directly increase the privately-owned Onni's profitability  
when the child care space is leased to a child care provider. The rezoning of the  
property may also result in a reclassification of assets on the company's balance sheet,  
and possibly result in subsequent recognition of expenses on the company's income

statement, thereby potentially reducing taxes owed or deferring taxes, among other financial benefits. Accounting changes resulting from the proposed rezoning that yield positive impacts to bank covenants or financing for Onni's other two waterfront construction projects within in the City of Richmond should also be thoroughly investigated. Moreover, if positive impacts from the rezoning allow the City to collect municipal taxes sooner, this would also be a benefit to the City of Richmond, who is not only the Applicant but also the approver. As such, the City of Richmond may be lacking real and/or perceived independence in their rezoning application for the Onni properties, and thus may be in a conflict of interest. To maintain the public interest, the rezoning application warrants further third party investigation into the potential conflict of interest.

## **PRECEDENT**

Elizabeth May, former leader of the Green Party of Canada, was intelligent enough to vote against allowing commercial drilling in an offshore national park on the East Coast of Canada. She correctly understood that it would set a precedent in Canada and open up National Parks across the country to commercial drilling. A similar logic should be applied to the City of Richmond's proposed rezoning application.

By using children as pawns to open up Onni's Imperial Landing development to anything other than Maritime Mixed Use activity, it could set a precedent that would allow Onni and other developers the opportunity to open other Maritime Mixed Use properties in Richmond to include other non-maritime uses. The impact of this rezoning application to Onni's two other construction projects in Richmond, and other waterfront properties being developed in Richmond, should also be investigated.

It could be perceived that the City of Richmond is trying to push through the proposed rezoning by using themselves as the Applicant and approver. Onni's name is not listed anywhere on the Notice of Public Hearing, nor in the Staff Report. This lack of disclosure and transparency reduces the public's recognition of the potential impacts of the rezoning to Onni and minimizes the opportunity for the public to raise informed objections to a possible precedent.

## **SAFETY**

Page GP-32 indicates that the City of Richmond discussed the proposed amendments with the Vancouver Coastal Health Authority. The Staff Report indicates that the Vancouver Coastal Health Authority expressed no concerns to the proposed amendment to add child care as a permitted use in the Mixed Maritime Area. This is extremely alarming considering page GP-40 of the Staff Report shows Maritime Mixed Use space, which could include welding, directly adjacent to the proposed child care space.

On Friday July <sup>15</sup>~~16~~, 2016 Sara Badyal, Planner 2 for the City of Richmond, stated that she does not have any safety concerns regarding the use of the Bayview property for child care. Sara Badyal indicated that Marci Archeck of the Vancouver Coastal Health

Authority was responsible for the health assessment regarding the proposed rezoning and that no safety issues were reported. I spoke directly to Marci Archeck earlier today. She indicated the following:

- The City of Richmond never indicated to her that the proposed area for rezoning for child care would be next to, or on top of, Maritime Mixed Use space, including potential welding. She said that if these types of operations were present at the time of her site visit, the Vancouver Coastal Health Authority would oppose the location for use for child care because it would not be a healthy space for child care purposes.
- She did not have a formal meeting with the City of Richmond to discuss findings. She met informally with staff at City Hall to discuss general feasibility of the space to be used for child care. She was not involved in conversations regarding the safety of children around water or in relation to Maritime Mixed Use operations.
- No report was written regarding her findings and it is not her position to advance safety recommendations at the time of her general feasibility assessment.

The City of Richmond has consistently indicated that the proposed rezoning is intended for older elementary students. This is misleading. The rezoning is proposed for the addition of child care, not the addition of child care for children of a certain age or region of residency. Child care under the City's bylaws does not define age of children under specific rezoning applications. Rather child care can be licensed for children from 0 to 12 years of age. There is nothing preventing the child care tenant to expand services to include children of all ages to increase profitability.

Having served in the Canadian Coast Guard Auxiliary for 5 years, I can say with certainty that babies don't float, nor do young children. Having a child care facility mere feet from the water is a danger to children and puts them at risk of drowning.

### **SCHOOL DISTRICT NO. 38**

On Friday July <sup>15<sup>th</sup> QAC</sup> ~~16~~, 2016, Sara Badyal stated that capacity of a child care facility is limited to roughly 7 m<sup>2</sup>/child. The Staff Report suggests that the area for child care would be limited to 540 m<sup>2</sup>. This yields a capacity of 77 children. GP-33 of the Staff Report indicates that the application was not referred to School District No. 38 because it did not involve residential uses that have the potential to generate 50 or more school aged children. Given the information provided by Sara Badyal, the capacity of the proposed facility is closer to that of a school rather than a child care facility and the application should have been referred to School District No. 38. With the proposed closure of schools in Richmond, it appears that the City is doing no more than relocating a public school to make a private school and increase Onni's profits at the severe detriment of parents in Richmond.

Parent's in the community are desperate for child care. I sympathize with these parents. However, using this desperation to bait the public into agreeing to change rezoning to the benefit of a private company and detriment of the community is morally and fundamental wrong.

## **CULTURE AND HERITAGE**

Steveston was founded on a rich heritage of maritime culture. The people of Steveston have the ocean and river in their blood. By re-zoning the Imperial Landing property to include anything other than Maritime Mixed Use, is an attack on the culture and heritage of the people of Steveston. As Canadians, we respect cultures from around the world. I expect the same respect for Canadian heritage and culture by our own government.

## **TRAFFIC**

The impact of the influx of traffic on Bayview Street and Easthope Avenue was not addressed in the Staff Report. The streets around the Imperial Landing development are narrow and do not include pick-up and drop-off areas for a child care facility. There is not sufficient street space to support the pick-up and drop-off of children. This amount of traffic and lack of sufficient road space would block streets; thus limiting emergency vehicle access, significantly impacting local residents trying to commute at similar times, and posing a potential risk to the public as well as children as a result of increased traffic congestion.

## **NOISE**

I submitted routine noise complaints to the City of Richmond and RCMP during the construction of Onni's Imperial Landing development on Bayview. Construction would routinely extend beyond permitted hours, such as the grinding and drilling of concrete at 11 PM. Only once did the police respond and ask Onni to stop work. When I spoke to staff at Richmond City Hall, I was told that the City was unable to respond because the contractor responsible for providing sound monitoring services did not have the equipment, nor trained staff, to provide the service. Moreover, I was told the contractor did not work during the evening when noise monitoring was needed. Thus, the City contracted noise monitoring services from a vendor who was unable to provide the contracted public services. Over a year ago, I called the Mayor's office several times to report this lack of oversight and ask for an explanation. I am still waiting for Mayor Brodie's response.

Many residents that live in close proximity to the Bayview property telecommute to work during the day, or do not need to leave their homes during the day. These residents would be directly affected by increase noise levels resulting from a child care facility, particularly a child care facility potentially holding over 77 children. It is unknown how the City would handle noise complaints from residents that result from increased noise levels, particularly as the City has shown a lack of past interest in the public's noise environment relating to the Onni property on Bayview.

Sincerely,



Andrea Hunter

To: City of Richmond, 6911 No.3 Road, Richmond, BC V6Y 2C1

Re: Richmond Official Community Plan Bylaw 7100, Amendment Bylaw 9589 and Richmond Zoning Bylaw 8500, Amendment Bylaw 9590 (ZT 16-735335)

Location: 4080 and 4100 Bayview Street

Purpose of OCP Amendment: To change the land use definition of "Maritime Mixed Use" (MMU) by retaining all existing Maritime Mixed Use (MMU) uses and adding child care use as a limited additional use.

We, the residents of 4233 Bayview Street, Richmond BC, V7E 6T7, **oppose** the proposed OCP Amendment to change the land use definition of "Maritime Mixed Use" (MMU) by retaining all existing Maritime Mixed Use (MMU) uses and adding child care use as a limited additional use at 4080 and 4100 Bayview Street.

Name	Unit #	Signature	Date
Andrea Hunter	101	Andrea Hunter	July 13, 2016
Shelley Morris	106	Shelley Morris	" " " "
Eleanor Hamilton	105	Eleanor Hamilton	July 13, 2016
JEAN NOLAN	304	Jean A. Nolan	July 13, 2016
WALTER WILKINS	201	w. wilkins	July 13, 2016
SIM HUNCHCLIFFE	311	[Signature]	JULY 13 / 16.
Anita Colautti	303	Anita Colautti	July 13 / 16
Mary Nasha	305	Mary Nasha	July 13 / 16
Marilon Go	307	Marilon G	July 12 / 16
Audrey Zoop	401	Audrey Zoop	July 13 / 16
Al Logan	409	Al Logan	13/7/2016
Marge Dowzic	206	M. Dowzic	13/7/2016
G. CORRIGAN	202	[Signature]	14/7/2016
Helen Burrows	203	Helen Burrows	14/7/2016
Janet LeBrun	102	J LeBrun	14/7/2016

















