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**To:** Planning Committee  
**From:** Wayne Craig  
Director, Development  
**Date:** January 18, 2018  
**File:** AG 16-734186  
**Re:** **Recent Decision by the South Coast Panel of the Agricultural Land Commission on Agricultural Land Reserve Application for Non-farm Use by Sanstor Farms Ltd. at 14671 Williams Road**

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The purpose of this memo is to advise Council on a recent decision by the South Coast Panel of the Agricultural Land Commission (ALC) on the Agricultural Land Reserve (ALR) Application for a non-farm use by Sanstor Farms Ltd. to allow the storage of sand at 14671 Williams Road.

### **Background**

On July 24, 2017, City Council resolved to forward the ALR Application for a non-farm use by Sanstor Farms Ltd. (AG16-734186) to the ALC for their consideration. The excerpt of the Minutes from the July 18, 2017 Planning Committee and July 24, 2017 Council meetings are attached to this memo (Attachment 1).

### **ALC Decision**

On January 16, 2018, the South Coast Panel of the ALC released its decision on the application. The application was approved with two members supported and one member opposed. In the Reasons for the Decision of the South Coast Panel (Attachment 2), it is indicated that the majority of the Panel finds that:

- the sand storage depot would facilitate the provision of clean sand, an input used in some agricultural operations; and
- its operation would provide a benefit to agricultural activities in the region.

For these reasons, the majority of the Panel approved the application subject to a number of conditions as indicated in the attached Reasons for the Decision, including, but not limited to:

- approval is provided for sand storage of dredged river sand from the south arm of the Fraser River; no other sand may be stored on the Property;
- approval for the non-farm use is granted for the sole benefit of the Applicant and is non-transferable; and
- no permanent infrastructure for the Depot is to be established on the Property.

It is important to note that the ALC Chair may direct the ALC Executive Committee to reconsider any panel decision if, within 60 days from the date of the decision, the ALC Chair considers that the decision may not fulfill the purposes of the ALC as set out in Section 6 of the Agricultural Land

January 18, 2018

- 2 -

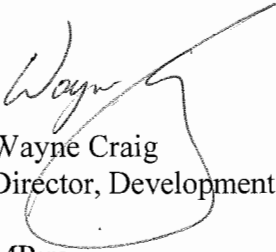
Commission Act. As such, a decision to reconsider the application would have to be made by the ALC Chair no later than March 17, 2018.

**Next Steps**

Staff will inform Council should ALC decide to direct the Executive Committee to reconsider the decision.

The applicant is now required to submit a rezoning application to proceed with the implementation of the sand storage operation on the subject site as detailed in the approved ALR application.

If you have any questions regarding either application, please contact me at 604-247-4625.

A handwritten signature in black ink, appearing to read "Wayne", is written over a circular stamp or seal.

Wayne Craig  
Director, Development

MP:rg  
Att. 2

Excerpt from the Minutes of  
**Planning Committee Meeting**

Tuesday, July 18, 2017 – 4:00 p.m.  
Anderson Room Richmond City Hall

**9. Application by Sanstor Farms Ltd. For an Agricultural Land Reserve Non-farm Use (Sand Storage) at 14671 Williams Road (File Ref. No. AG 16-734186) (REDMS No. 5333733 v. 8)**

John Hopkins, Planner 3, reviewed the application, noting that (i) authorization to submit a non-farm use application to the Agricultural Land Commission (ALC) requires Council endorsement and staff are recommending that the application be denied, (ii) the applicant is proposing to use five hectares of the subject site as a permanent facility for sand storage, (iii) should the facility be decommissioned, the subject site can be reclaimed for agricultural use, (iv) the proposed facility would displace a significant Environmentally Sensitive Area (ESA) and would require off-site ESA compensation, (v) the proposed facility is not consistent with the OCP and the City discourages non-farm use on the Agricultural Land Reserve (ALR), and (vi) staff are working with the applicant to seek alternative sites within industrial zones including potentially leasing City-owned sites.

Discussion ensued with regard to (i) efforts to seek alternative sites for the proposed facility, (ii) the timeline of the potential relocation, (iii) the business history of Sanstor Farms Ltd. in Richmond, and (iii) the services provided by Sanstor Farms Ltd. to the farming community in the city.

In reply to queries from Committee, Mr. Hopkins noted that the subject site has not been previously farmed, however can be reclaimed for agricultural use.

Bruce Mather's, and Brian French, Sanstor Farms Ltd., spoke on the proposed application, noting that (i) the current sand storage site will be redeveloped for warehousing in the future, (ii) efforts to locate an alternative site began in 2014, (iii) the subject site may not be suitable for farming due to the shallow layer of organic soil, the high acidity level, and the high mineral content, (iv) the subject site may contain diseased European Birch trees, and (v) the subject site is suitable for the proposed facility because of its size and proximity to the river.

In reply to queries from Committee, Wayne Craig, Director, Development, noted that the non-farm application was submitted to City in June 2016.

As a result of the discussion, a motion to deny authorization of Sanstor Farms Ltd. to apply to the ALC for a non-farm use to allow the storage of sand at 14671 Williams Road was introduced; however failed to receive a seconder.

It was moved and seconded

*That authorization for Sanstor Farms Ltd. to apply to the Agricultural Land Commission for a non-farm use to allow the storage of sand at 14671 Williams Road is approved.*

**CARRIED**

Opposed: Cllr. Steves

Excerpt from the Minutes of  
**Regular Council Meeting**

Monday, July 24, 2017 – 7:00 p.m.  
Council Chambers  
Richmond City Hall

- 25. Application by Sanstor Farms Ltd. For an Agricultural Land Reserve Non-farm Use (Sand Storage) at 14671 Williams Road (File Ref. No. AG 16-734186, 08-4105-04-04) (REDMS No. 5333733 v. 8, 5079429)**

It was moved and seconded

*That authorization for Sanstor Farms Ltd. to apply to the Agricultural Land Commission for a non-farm use to allow the storage of sand at 14671 Williams Road is approved.*

**Carried**  
Opposed: Mayor Bodie  
Cllrs. Au  
Day  
Steves

Councillor Steve's distributed materials related to the Application by Sanstor Farms Ltd. (attached to and forming part of these Minutes as Schedule 1).

TO: Mayor and Councillors

FROM: Councillor Harold Steves

RE: Non-farm use application, 14671 Williams Road

Date: July 24, 2017

Attached is a map of the area showing the proposed Williams Road sand dump site with a large arrow and a nearby site at 14291 Triangle Road with a smaller arrow.

1) The Triangle road site was for a church and farm site for the Sant Narinkari Mission Canada. It has been rejected for a non-farm use twice, first in 2005 and again in 2009. The Mission site was rejected for the same reasons staff are recommending against the sand dump. It does not comply with the OCP. Financial limitations and not being able to afford to purchase properly designated or zoned property is not grounds to support such an application. Diminished soil quality is not sufficient justification. Land deemed to be not suitably suited for soil based agriculture does not preclude other agricultural activities (i.e. Greenhouses)The proposed uses are considered urban uses. The congregation undertaking farming is commendable but no net benefit to agriculture has been demonstrated. Although it is a non-farm use application it still represents the loss of land to non-agricultural uses.

“Triangle Road currently serves as a clearly defined edge and buffer to ALR areas situated north of the road. The non-farm use proposal in the ALR would break the continuity of the existing buffer along Triangle road by introducing an intensive urban development in an active agricultural area.”

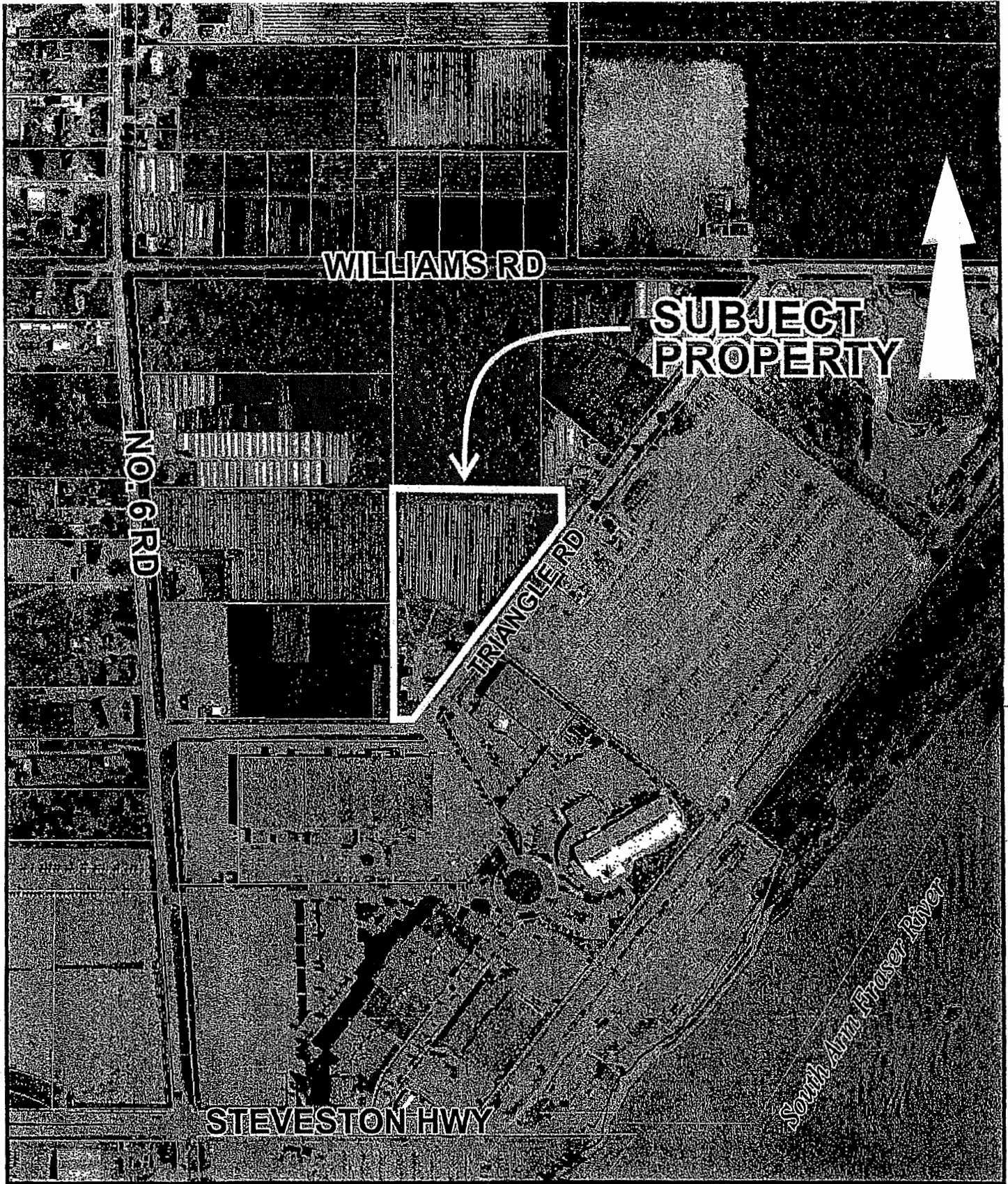
If a non-farm use on Triangle Road is a threat to “areas situated north of the road”, a non-farm use on Williams Road is even worse.

2) 12871 Steveston Highway was approved as a fill site for the purpose of growing blueberries in 2013. Fill was to come from “larger development projects that will be proceeding with the next year in Richmond” A \$10,000 bond was required. On several occasions agricultural consultants have noted concrete and gravel on the site that “will need to be removed when the fill is completed” A recent report indicated the part of the site was over filled and must be levelled out.

Now 12871 Steveston Highway is for sale for \$19,500,000 about four times the original value of the property and the blueberries have not been planted.

Have the soil requirements been met? Will the \$10,000 be forfeited?

3) 14671 Williams Road offers a \$300,000 bond but the increase in value as an urban property will be just as great as the increased value of the Steveston Highway property. Like the Triangle Road property there is no net benefit to agriculture. It could be a continuous sand dump and it further threatens the area with further non-farm uses. Even the Triangle Road property could be back again. One basic principle of the ALC is that land that is suitable for one kind of agriculture should not be altered just to change the type of crop grown. In Richmond the highest and best use of class O4W soils is growing blueberries. While the organic layer may be shallow, the consultant has indicated that the soils could be improved to O4WD with careful land clearing. The best example of a blueberry field on similar soils is a 35 acre field on Finn Road. The field was levelled, with a berm around it and drained with a pumping system to remove excess water to the adjoining City of Richmond ditch. The best use is blueberries.



RZ 07-368211

PLN - 72

Original Date: 04/26/07

Amended Date:

Note: Dimensions are in METRES



3. A water pump automatically pumps the water out of the field when it rains and the water level is too high. Berms keep the water from running back in.





FINN ROAD BLUEBERRY FARM: PLN - 74



**FOR SALE**

**35 Acres Agricultural Land**

英亩农地 投资良机

**Jason Van**

Personal Real Estate Corporation

**778-788-0958**

[jason.van@toptiergroup.ca](mailto:jason.van@toptiergroup.ca)

**Robin Fu**

Personal Real Estate Corporation

**778-688-0806**

[robin.fu@toptiergroup.ca](mailto:robin.fu@toptiergroup.ca)



**Agricultural Land Commission**  
 133-4940 Canada Way  
 Burnaby, British Columbia V5G 4K6  
 Tel: 604 660-7000  
 Fax: 604 660-7033  
 www.alc.gov.bc.ca

January 16, 2018

ALC File: 55285

Brian French  
**C&F Land Resource Consultants Ltd.**  
**DELIVERED ELECTRONICALLY**

Dear Mr. French:

**Re: Application to Conduct a Non-Farm Use in the Agricultural Land Reserve (ALR)**

Please find attached the Reasons for Decision of the South Coast Panel (Resolution #15/2018) as it relates to the above noted application. A Decision Map depicting the decision is also attached (Schedule A). As agent, it is your responsibility to notify the applicant accordingly.

**Reconsideration of a Decision as Directed by the ALC Chair**

Please note that pursuant to [s. 33.1 of the Agricultural Land Commission Act](#), the Chair may direct the executive committee to reconsider any panel decision if, within 60 days from the date of this decision, he considers that the decision may not fulfill the purposes of the commission as set out in s. 6.

You will be notified in writing if the Executive Committee is directed to reconsider your decision. The Commission advises you to take this 60 day period into consideration prior to proceeding with any actions upon this decision.

**Reconsideration of a Decision by an Affected Person**

We draw your attention to [s. 33\(1\) of the Agricultural Land Commission Act](#) which provides a person affected the opportunity to submit a request for reconsideration.

33(1) On the written request of a person affected or on the commission's own initiative, the commission may reconsider a decision of the commission under this Act and may confirm, reverse or vary it if the commission determines that:

- (a) evidence not available at the time of the original decision has become available,
- (b) all or part of the original decision was based on evidence that was in error or was false.

The request must be received within one (1) year from the date of this decision's release. For more information, refer to *ALC Policy P-08: Request for Reconsideration* available on the ALC website.

For further clarity, s. 33.1 and s. 33(1) are separate and independent sections of the *Agricultural Land Commission Act*.

Page 2 of 2

Further correspondence with respect to this application is to be directed to Shawna Wilson at (Shawna.Mary.Wilson@gov.bc.ca).

Yours truly,

PROVINCIAL AGRICULTURAL LAND COMMISSION

A handwritten signature in black ink that reads "Shawna Wilson". The signature is written in a cursive, flowing style.

Shawna Wilson, Land Use Planner

Enclosures: Reasons for Decision (Resolution #15/2018)  
Schedule A: Decision Map  
Schedule B: Site Plan

cc: City of Richmond (File: AG 16-734186)

55285d1

**PLN - 77**



**AGRICULTURAL LAND COMMISSION FILE 55285**

**REASONS FOR DECISION OF THE SOUTH COAST PANEL**

Application submitted pursuant to s. 20(3) of the *Agricultural Land Commission Act*

**Applicants:**

**Sanstor Farms Ltd. Inc. No.  
BC0971292  
(the "Applicants")**

**Agent:**

**Brian French, C&F Land  
Resource Consultants Ltd.  
(the "Agent")**

**Application before the South Coast Regional Panel:**

**William Zylmans, Panel Chair  
Satwinder Bains  
Ione Smith**



## **THE APPLICATION**

[1] The legal description of the property involved in the application is:

Parcel Identifier: 003-464-504

South Half of the South East Quarter, Section 28, Block 4 North, Range 5 West,

Except: South 33 Feet, New Westminster District

(the "Property")

[2] The Property is 8.3 ha.

[3] The Property has the civic address 14671 Williams Road, Richmond, BC.

[4] The Property is located within a designated agricultural land reserve ("ALR") as defined in s. 1 of the *Agricultural Land Commission Act* (the "ALCA").

[5] The Property is located within Zone 1 as defined in s. 4.2 of the *ALCA*.

[6] Pursuant to s. 20(3) of the *ALCA*, the Applicant is applying to establish a dredged river sand depot (the "Depot") on the eastern 5 ha of the Property (the "Proposal"). The Proposal along with supporting documentation is collectively the application (the "Application").

[7] In addition to the Proposal, the Applicant wants to make agricultural improvements to the western 3 ha of the Property. The Application submits that the land will be improved by the installation of drainage, the placement of 0.5 metres of topsoil (to be salvaged from the establishment of the proposed Depot on the eastern portion of the Property), and the addition of soil amendments including lime and fertilizer. The agricultural improvements as described do not require an application to the Commission. For this reason, the Panel only considered the Depot.

## **RELEVANT STATUTORY PROVISIONS**

[8] The Application was made pursuant to s. 20(3) of the *ALCA*:



20(3) An owner of agricultural land or a person with a right of entry to agricultural land granted by any of the following may apply to the commission for permission for a non-farm use of agricultural land.

[9] The Panel considered the Application within the context of s. 6 of the *ALCA*. The purposes of the Agricultural Land Commission (the "Commission") set out in s. 6 are as follows:

6 The following are the purposes of the commission:

- (a) to preserve agricultural land;
- (b) to encourage farming on agricultural land in collaboration with other communities of interest; and
- (c) to encourage local governments, first nations, the government and its agents to enable and accommodate farm use of agricultural land and uses compatible with agriculture in their plans, bylaws and policies.

#### **EVIDENTIARY RECORD BEFORE THE PANEL**

[10] The Panel considered the following evidence:

1. The Application
2. Local government documents
3. Agricultural capability map, ALR context map and satellite imagery
4. Third party comments

All documentation noted above was disclosed to the Agent in advance of this decision.

[11] At its meeting of July 24, 2017, the Council of the City of Richmond resolved to forward the Application to the Commission.

**FINDINGS**

[12] In assessing agricultural capability, the Panel referred to agricultural capability mapping and ratings. The ratings are identified using the BC Land Inventory (BCLI), 'Land Capability Classification for Agriculture in B.C.' system. The improved agricultural capability ratings identified on BCLI map sheet 92G/3h for the mapping units encompassing the Property are Class 2 and Class 3, more specifically 99% (6: 03LW - 4: 3DW) 1% (6: 02LW - 4: 3DW) where O represents organic soils.

Class 2 - land is capable of producing a wide range of crops. Minor restrictions of soil or climate may reduce capability but pose no major difficulties in management.

Class 3 - land is capable of producing a fairly wide range of crops under good management practices. Soil and/or climate limitations are somewhat restrictive.

The limiting subclasses associated with this parcel of land are L (degree of decomposition-permeability), W (excess water), and D (undesirable soil structure and/or low perviousness).

[13] The Panel reviewed the BCLI ratings and finds that the Property can support agriculture.

[14] This following section sets out the findings of Panel Chair Zylmans and Commissioner Bains (the "majority of the Panel").

[15] E. Mathers Bulldozing, a subsidiary company of Sanstor Farms Ltd., currently operates a dredged river sand storage depot on the adjacent non-ALR property to the east of the Proposal (PID 003-475-727) (the "Adjacent Property"). The property on which the current dredged river sand storage depot is operating is in the process of developing warehouses for industrial use. The Application submits that the dredged river sand depot is incompatible with the industrial development of the Adjacent Property and therefore relocation is required in order to continue operating.

[16] The eastern 5 ha of the Property is not cleared. The Application submits that the Depot would occupy the eastern 5 ha portion of the Property and that the existing vegetation would



be cleared, the site grubbed, and the topsoil stripped and salvaged for use on the western 3 ha of the Property.

[17] With regard to the proposed site for the Depot, the Application submits that “[t]he requirements for a Fraser River dredge sand storage site are very constrained by distance from the River, proximity to critical dredge sites and suitability of the site for this type of heavy industrial use”. The Application further submits that “dredging infrastructure composed of buried and surface input pipe and drainage water conduit are already installed on the western boundary of the existing Mathers site and would be reconfigured to fit the new site”. In the local government report, the City of Richmond provided alternative locations for the Depot that are outside of the ALR. The Agent provided a response to the alternative locations identified by the City of Richmond in a letter dated August 30, 2017. The Panel reviewed the submissions regarding the location of the Depot. The majority of the Panel finds that the required pumping infrastructure has already been established for the existing use on the Adjacent Property and that limited additional infrastructure is required for the Depot. In consideration of the location requirements of the sand storage depot, in this circumstance, the majority of the Panel finds that the Depot is appropriately located on the Property.

- [18] A series of berms and canals are proposed to be constructed for the Depot in order to contain the sand storage area, including:
- a) a one to two metre high perimeter berm to isolate the Proposal from the eastern portion of the Property and adjacent ALR land;
  - b) an intercept drainage canal, within the perimeter berm to collect and pump drainage water from the Proposal into the Fraser River;
  - c) a berm, inside the intercept canal, approximately four to five metres in height to contain the dredged river sand.

The majority of the Panel finds that with the construction of the berms and implementation of drainage the Proposal would not have a negative impact to surrounding agricultural land.

- [19] No permanent structures are required for the Proposal. The non-permanent structures associated with the Depot include a scale house on wheels and a scale on lock blocks. The Agent submits that a fabric roof building with a lock block base may also be required in the future. The majority of the Panel finds that the use of these non-permanent structures does not preclude the Property from reclamation of the area in the future.
- [20] The Application submits that approximately 100,000 cubic metres of dredged river sand will remain on the eastern 5 ha portion of the Property at all times. As the material proposed to be stored is sand of a quality suitable for agriculture, the Panel finds that the storage of clean sand does not preclude this portion of the Property from reclamation in the future. The majority of the Panel also finds that the stored river sand could be used for reclamation of the Property in the future.
- [21] A paved area is proposed for access to the Depot. The proposed paved area is  $\pm 1,650$  square metres but that it could be reduced to  $\pm 600$  square metres, if necessary. The majority of the Panel finds that a  $\pm 600$  square metres paved area would be sufficient for the proposed use.
- [22] The majority of the Panel finds that the sand storage depot would facilitate the provision of clean sand, an input used in some agricultural operations, and that its operation would provide a benefit to agricultural activities in the region.

### **DECISION OF THE MAJORITY**

- [23] For the reasons given above, the majority of the Panel approves the Application subject to the following conditions:

#### **General**

- a. approval is provided for sand storage of dredged river sand from the south arm of the Fraser River; no other sand may be stored on the Property;
- b. approval for the non-farm use is granted for the sole benefit of the Applicant and is non-transferable;
- c. no permanent infrastructure for the Depot is to be established on the Property;

**Prior to Depot Operations**

- d. the registration of a covenant on title stating that the Depot is for the sole benefit of the Applicant, that the sand storage depot is only to be used for sand storage of dredged river sand from the south arm of the Fraser River, and that approval for the sand storage operations is terminated should the Applicants cease the Depot operations;
- e. siting of the non-farm use as identified in the attached Decision Map (Schedule A) and the attached Site Plan (Schedule B);
- f. the establishment of the berms and canals on the easterly 5 ha of the Property as described in Paragraph 18 above and illustrated as “buffer, berm and collector ditch” on the attached Site Plan (Schedule B);
- g. the maximum area to be paved is 600 square metres;
- h. to ensure the successful implementation of remediation, a financial security in the form of an Irrevocable Letter of Credit (ILOC) in the amount of \$300,000 must be made payable to the Minister of Finance c/o the Agricultural Land Commission. The ILOC is to ensure remediation is conducted in accordance with the information submitted with the Application and the conditions of this decision. For greater clarity, some or all of the ILOC will be accessible to, and used by, the Commission upon the failure of the Applicant to comply with any or all aspects of the conditions of approval contained herein;
- i. should rezoning of the Property be required, the rezoning must include agricultural uses; the proposed rezoning must be reviewed and approved by the Commission prior to first reading;

**During Depot Operations**

- j. heavy equipment that is not required in the daily operations of the Depot cannot be stored on the Property;
- k. sand pumping and storage activities must not negatively impact the drainage of adjacent properties;
- l. the submission of a report every five (5) years for the duration of the Depot operation outlining the following:
  - i. the volume of sand stored annually for each year in the five year period



- ii. the agricultural use and improvements carried out for each year in the five year period

**Post Depot Operations**

- m. should the Depot cease operations, the Property must be remediated in accordance with the correspondence dated October 31, 2017 from Brian French and the reclamation plan outlined in the *Assessment of Agricultural Capability for 14671 Williams Road, Richmond, B.C.* prepared by C&F Land Resource Consultants Ltd. dated April 20, 2016 (excerpts from each compiled in the attached Schedule C: Reclamation Plan);

[24] This decision does not relieve the owner or occupier of the responsibility to comply with applicable Acts, regulations, bylaws of the local government, and decisions and orders of any person or body having jurisdiction over the land under an enactment.

[25] When the ALC has received evidence of completion of conditions d, l, and j, it will confirm that the construction and operation can commence.

[26] Where a regional panel consists of three appointed members:  
(a) the quorum to make a decision is 2: *Interpretation Act, s. 18*,  
(b) where all 3 members are present, the decision of the majority governs the Application decision: *Interpretation Act, s. 18*.

[27] A decision of the Panel is a decision of the Commission pursuant to s. 11.1(5) of the ALCA.

[28] This decision is recorded as Resolution #15/2018 and is released on January 16, 2018.



**CERTIFICATION OF DECISION**

This is a decision of the majority of the South Coast Panel.

William Zylmans, Commissioner

Satwinder Bains, Commissioner

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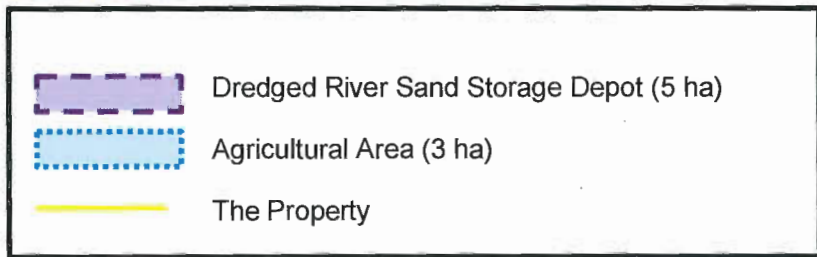
**DISSENTING VOTE**

[30] The reasons for which I do not support the decision are:

- a. The Proposal is not in keeping with the purpose of s.6(a) of the ALCA to preserve agricultural land;
- b. Sand storage is not a permitted use in the ALR and is more appropriately located on land outside the ALR; and
- c. Alternative locations for sand storage exist outside the ALR.

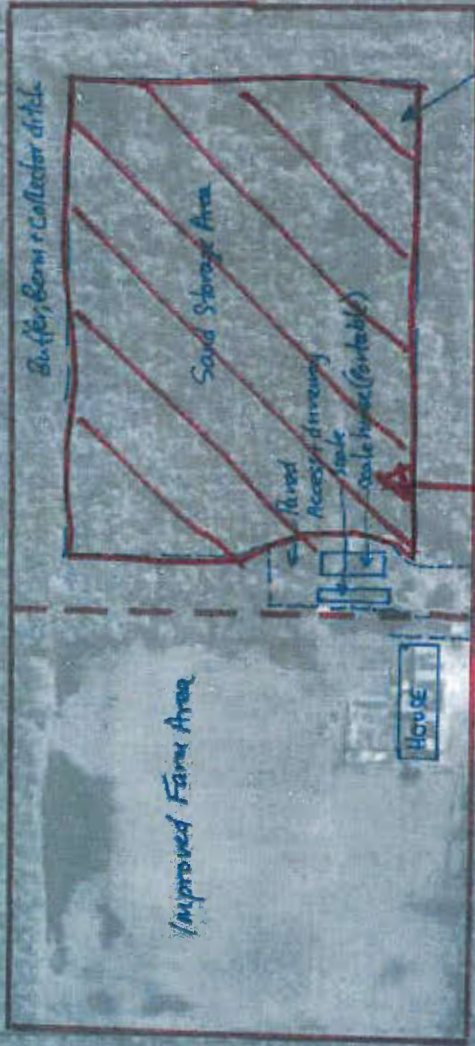
These are my reasons.

Ione Smith, Commissioner



Schedule B: Agricultural Land Commission Site Plan  
ALC File 55285 (Sanstor Farms Inc.)  
Conditionally Approved Non-Farm Use  
ALC Resolution #15/2018

PROPOSED INFRASTRUCTURE  
FOR SANDSTOR FARMS  
Sand Storage Facility  
Scale 1:2000  
(Conceptual, Subject to adjustment)



Area proposed for storage of sand,  $\pm 30000 M^3$   
Base  $\pm 100,000 M^3$  of sand to remain in place  
in case needed for reclamation of site



Report on Proposed Non-farm Use at 14671 Williams Road  
Mr. Bruce Mathers: April 20, 2016

Page -9-

### **6.3 Reclamation if Site Decommissioned**

#### **6.3.1 Reclamation Activities**

In the unlikely event of Mathers quitting the site, it would be reclaimed for agricultural use. Reclamation would entail:

- a) stripping and stockpiling of +/-100,000m<sup>3</sup> of sand to be used in reclamation;
- b) removal of infrastructure from the site;
- c) ripping the native sub-base to a depth of 1 metre in two directions at one metre spacing to loosen the clay;
- d) replace stockpiled sand to a depth of +/- 2 metres spread evenly over the disturbed site; the target finished elevation would be 1.0 metres geodetic;
- e) import Class A compost onto the site to provide a placed depth of at least 150mm and cultivate into the sand layer top a depth of 400mm;
- f) Install a subsurface drainage system consistent with the improved system on the existing field;
- f) manage fertility as required to bring the site up to an acceptable agricultural standard for a range of crops;
- g) establish a cover crop if a perennial crop is not intended for immediate planting;
- h) secure a suitable source of irrigation water either from municipal water supply or ditch water having low salt content.

The final reclaimed agricultural capability would be Class 4A unimproved with improvement to Class 2A with irrigation. This reclaimed land would be highly suited for root crops, leafy vegetables, berries and field crops.





Report on Proposed Non-farm Use at 14671 Williams Road  
Mr. Bruce Mathers: April 20, 2016

Page -10-

### 6.3.2 Reclamation Cost Estimate

The estimated cost to carry out the decommissioning and reclamation of the sand storage site in case of closure is as follows:

ACTIVITY	DETAILS	COST
REMOVE INFRASTRUCTURE	REMOVE BUILDINGS & SCALE	10,000
STRIP AND STOCKPILE SAND FOR RECLAMATION ABOVE CLAY BASE	50000M2 AREA 2M DEEP = 100,000M3 @ \$0.50/M3	50,000
RIP CLAY SUBSOIL TO 1M DEPTH IN 2 DIRECTIONS	RIP WITH DOZER AND RIPPER, 3,000M2/HR FOR TWO TREATMENTS = 25 HRS @ \$200/HR	5,000
REPLACE STOCKPILED SAND	100,000M3 @ 0.50/M3	50,000
SUPPLY & PLACE COMPOST	50,000M2 x 0.15M = 7,500M3 @ \$15.00/M3 IN PLACE	112,500
DRAINAGE, IRRIGATION, CULTIVATION & SEEDING	50,000M2 @ 0.50/M2	25,000
MONITORING AND SUPERVISION	DURING DECOMMISSIONING AND RECLAMATION	20,000
<b>ESTIMATED TOTAL RECLAMATION COST</b>		<b>272,500</b>

Therefore the total estimated cost to reclaim the sand storage site to an acceptable agricultural condition if the sand storage activity were to cease is \$272,500. Bonding to secure this eventuality with contingency allowance in the amount of \$300,000 would ensure that the site could be returned to productive agriculture.



**Decommissioning and Reclamation:** In our April 20, 2016 report we discuss the estimated cost of reclamation of the site in the unlikely event of it being closed. We suggest a total reclamation cost of \$272,500 which would be secured by bonding. The cost to remove the asphalt paving would be minimal estimated to be about \$5,000 for the 1650m<sup>2</sup> of paving and \$2,250 for the reduced area of 600m<sup>2</sup>. Removal of the buried piping within the ALR area would cost less than \$500.00. Removal of the scale and lockblocks would cost about \$1,500 for an excavator and truck. The total estimated cost of removing the infrastructure is between \$4,250 and \$7,000 depending on the paved area. Of course the bulk of the reclamation cost is associated with the land rehabilitation and return to agricultural production.