



**General Purposes Committee  
Electronic Meeting**

**Anderson Room, City Hall  
6911 No. 3 Road**

**Monday, December 1, 2025  
4:00 p.m.**

Pg. #      ITEM

**MINUTES**

**GP-3**      *Motion to adopt the **minutes** of the meeting of the General Purposes Committee held on November 17, 2025.*



**ENGINEERING AND PUBLIC WORKS DIVISION**

**1. 2025 PROVINCIAL NATURAL RESOURCE PERMITTING  
IMPROVEMENTS INITIATIVE**

(File Ref. No. 10-6125-01) (REDMS No. 8200574)

**GP-8**

**See Page GP-8 for full report**

*Designated Speaker: Nadia Chan*

**STAFF RECOMMENDATIONS**

- (1) *That the survey responses, as described in the report titled “2025 Provincial Natural Resource Permitting Improvements Initiative”, dated November 5, 2025, from the Director, Climate and Environment, be endorsed and submitted to the Ministry of Water, Land and Resource Stewardship; and*

- (2) *That a letter from the Mayor be sent to the Minister of Water, Land and Resource Stewardship requesting that more meaningful consultation, as outlined in the report, be implemented to support this provincial initiative.*



## LAW AND COMMUNITY SAFETY DIVISION

2. **APPLICATION TO AMEND FOOD PRIMARY LIQUOR LICENCE # 311573 - CHANGE TO HOURS OF LIQUOR SERVICE – YOKAI TAPAS & SAKE BAR – 140 – 6386 NO 3 RD**  
(File Ref. No. 12-8275-20-AMANDA#/2014) (REDMS No. 8166612)

GP-37

See Page GP-37 for full report

*Designated Speaker: Mark Corrado*

### STAFF RECOMMENDATIONS

- (1) *That the application from Imagin Restaurants Concepts Ltd., doing business as Yokai Tapas & Sake Bar, for an amendment to Food Primary Licence #311573, requesting an increase to their hours of liquor service from 09:00am to Midnight Monday to Sunday, to 09:00am to 2:00am Monday to Sunday, be supported; and*
- (2) *That a letter be sent to the Liquor and Cannabis Regulation Branch, which includes the information as set out in Attachment 1 to this report, advising that Council recommends the approval of the amendment to the Food Primary Liquor Licence as described in the Recommendation 1 of this report.*



## ADJOURNMENT





## General Purposes Committee

Date: Monday, November 17, 2025

Place: Anderson Room  
Richmond City Hall

Present: Mayor Malcolm D. Brodie, Chair  
Councillor Chak Au (entered the meeting at 4:15 p.m. by teleconference)  
Councillor Carol Day  
Councillor Laura Gillanders  
Councillor Kash Heed  
Councillor Andy Hobbs  
Councillor Alexa Loo  
Councillor Bill McNulty  
Councillor Michael Wolfe

Call to Order: The Chair called the meeting to order at 4:00 p.m.

### MINUTES

It was moved and seconded

*That the minutes of the meeting of the General Purposes Committee held on November 3, 2025, be adopted as circulated.*

**CARRIED**

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**PARKS, RECREATION AND CULTURE DIVISION**

**1. CITY SIGNATURE AND COMMUNITY EVENTS PROGRAM 2026**

(File Ref. No. 11-7400-01) (REDMS No. 8181002)

In response to queries from Committee, staff advised that (i) an event contingency of \$50,000 is included to address potential challenges with individual events, such as unexpected production issues related to weather, unanticipated increased rental costs, additional safety requirements, event alterations due to construction, and/or sponsorships or grant shortfalls, and any unused funding is returned to the Rate Stabilization Account and (ii) the City conducted a thorough review of the Richmond Event Approval Coordination Team (REACT) process, specifically with regard to safety and security requirements and risk mitigation for community events.

Discussion ensued regarding (i) smaller community events, with staff noting that City events are included on the community calendar on the City's website, (ii) developing risk assessment and safety plan guidelines and other tools to support event organizers in ensuring the safety of event participants, (iii) funding in place to provide the appropriate level of safety and security at City events, and (iv) how operating departments, including Richmond RCMP, Richmond Fire-Rescue, and Public Works, adjust schedules and personnel assignments to meet event-related needs within their existing resources, with associated costs already accommodated in their regular operating budgets.

Staff advised that a memorandum outlining the parameters and use of the City events contingency budget can be provided in advance of the November 24, 2025 Council meeting.

It was moved and seconded

**(1) *That the City Signature and Community Events Program 2026, as outlined in Table 1 of the report titled "City Signature and Community Events Program 2026", dated October 27, 2025, from the Director, Arts, Culture and Heritage Services, be approved for the following events and initiatives:***

- (a) *Children's Arts Festival;***
- (b) *Richmond Cherry Blossom Festival;***
- (c) *Doors Open Richmond;***
- (d) *Community Celebration Grant Program;***
- (e) *Neighbourhood Block Party Program;***
- (f) *Steveston Salmon Festival;***
- (g) *Richmond Maritime Festival;***
- (h) *Richmond Farm Fest; and***

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- (i) *Community Event Safety Enhancements;*
- (2) *That the expenditures totaling \$1,113,900 for the City Signature and Community Events Program 2026 with funding of \$1,027,900 from the Rate Stabilization Account, \$41,000 estimated sponsorship and \$45,000 estimated grant revenue be considered in the 2026 budget process; and*
- (3) *That a Community Festive Lights Event at Minoru Lake be investigated, including timing, budget and potential partnerships.*

**CARRIED**

**COUNCILLOR ALEXA LOO**

**2. MOTION TO SUPPORT AFFECTED LANDOWNERS DURING APPEAL OF COWICHAN LAND CLAIM**

(File Ref. No.) (REDMS No.)

It was moved and seconded

- (1) *Write a letter to the Prime Minister, the Premier, the Ministers of Finance, the Attorneys General to mitigate the effects of the Cowichan Land ruling on private landowners during the appeal process; and*
- (2) *For staff to work with the Federal and Provincial governments to investigate options to support landowners in the disputed lands in Richmond to mitigate the effects of the Cowichan Land ruling during the appeal process and report back.*

The question on the motion was not called as discussion ensued regarding (i) the Supreme Court of British Columbia's precedent-setting Cowichan Tribes decision, (ii) the affected properties within the Claim Area, and (iii) uncertainty for landowners and business owners and concerns from residents.

In response to queries from Committee, staff advised that (i) what is contemplated in the motion would not interfere with any discussions that the Province is having or contemplating to have with the Cowichan Tribes, (ii) any relief or guarantees would ultimately need to be acted on by the Province, (iii) the 18-month stay only applies to the titles held by Richmond and Canada that are occupied by the Vancouver Fraser Port Authority where those titles were found to be invalid and defective, and Justice Barbara Young said the 18-month suspension of the title declaration was to give the Cowichan, Canada, and Richmond time to make "necessary arrangements" for the transition of title, and (iv) the Provincial government will be asking for a stay of the implementation of the Cowichan Tribes case.

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Further discussion ensued regarding (i) liaising with the Province to find out what they are doing in regards to the situation, (ii) having staff work closely with the Federal and Provincial governments to collect reliable information regarding the needs and concerns of home and business owners affected by the Supreme Court of British Columbia's decision, (iii) requesting that the Provincial government incorporate fee simple title properties affected by the Cowichan Tribe ruling into the property tax deferment program until a decision is reached by the BC Court of Appeal regarding this matter, and parameters of a tax deferment, (iv) advocating for citizens and business owners, and (v) filed notices of appeal in the case.

As a result of the discussion, the following **amendment motion** was introduced:

It was moved and seconded

*That Part (2) of the motion be amended to read as follows:*

*For staff to work with the Federal and Provincial governments to investigate options to support landowners in the disputed lands in Richmond to mitigate the effects of the Cowichan Land ruling during the appeal process, including that the City of Richmond requests that the Provincial Government incorporate fee simple title properties affected by the Cowichan Tribe ruling into the property tax deferment program until a decision is reached by the BC Court of Appeal regarding this matter, and report back.*

The question on the amendment motion was not called as discussion ensued regarding (i) interest and fees for property tax deferment, and (ii) various components and details to be incorporated in the report back process.

The question on the amendment motion was then called and it was **CARRIED** with Cllr. Wolfe opposed.

Further discussion ensued regarding support and information provided to Richmond residents and small businesses by Provincial government community contacts in response to the Cowichan decision.

The question on the main motion as amended, which reads as follows:

- (1) *Write a letter to the Prime Minister, the Premier, the Ministers of Finance, the Attorneys General to mitigate the effects of the Cowichan Land ruling on private landowners during the appeal process; and*

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- (2) *For staff to work with the Federal and Provincial governments to investigate options to support landowners in the disputed lands in Richmond to mitigate the effects of the Cowichan Land ruling during the appeal process, including that the City of Richmond requests that the Provincial Government incorporate fee simple title properties affected by the Cowichan Tribe ruling into the property tax deferment program until a decision is reached by the BC Court of Appeal regarding this matter, and report back.*

was then called and it was **CARRIED** with Cllr. Wolfe opposed.

**ADJOURNMENT**

It was moved and seconded

*That the meeting adjourn (5:05 p.m.).*

**CARRIED**

Certified a true and correct copy of the Minutes of the meeting of the General Purposes Committee of the Council of the City of Richmond held on Monday, November 17, 2025.

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Mayor Malcolm D. Brodie  
Chair

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Shannon Unrau  
Legislative Services Associate



# City of Richmond

## Report to Committee

**To:** General Purposes Committee  
**From:** Chad Paulin  
Director, Climate and Environment  
**Date:** November 5, 2025  
**File:** 10-6125-01/2025-Vol  
01  
**Re:** 2025 Provincial Natural Resource Permitting Improvements Initiative

### Staff Recommendations

1. That the survey responses, as described in the report titled “2025 Provincial Natural Resource Permitting Improvements Initiative”, dated November 5, 2025, from the Director, Climate and Environment, be endorsed and submitted to the Ministry of Water, Land and Resource Stewardship; and
2. That a letter from the Mayor be sent to the Minister of Water, Land and Resource Stewardship requesting that more meaningful consultation, as outlined in the report, be implemented to support this provincial initiative.

Chad Paulin  
Director, Climate and Environment  
(604-247-4672)

Att. 4

REPORT CONCURRENCE		
<b>ROUTED TO:</b>	<b>CONCURRENCE</b>	<b>CONCURRENCE OF GENERAL MANAGER</b>
Intergovernmental Relations & Corporate & Strategic Planning	<input checked="" type="checkbox"/>	
Parks Services	<input checked="" type="checkbox"/>	
Engineering	<input checked="" type="checkbox"/>	
Facility Services & Project Development	<input checked="" type="checkbox"/>	
Public Works	<input checked="" type="checkbox"/>	
Policy Planning	<input checked="" type="checkbox"/>	
Development Applications	<input checked="" type="checkbox"/>	
<b>SENIOR STAFF REPORT REVIEW</b>	<b>INITIALS:</b>	<b>APPROVED BY CAO</b>



## Staff Report

### Origin

The Ministry of Water, Land and Resource Stewardship (the Ministry) launched and promoted its Natural Resource Permitting Improvements Initiative on September 22, 2025, as process enhancements to efficiency, coordination, and responsiveness of natural-resource and water-related permitting. The initiative includes legislative and regulatory changes to the Water Sustainability Act (WSA), Riparian Areas Protection Act (RAPA), and Forest Act.

The Ministry has circulated surveys and is seeking feedback from the City to support this initiative. Detailed implementation guidance on future legislative and regulatory changes has not yet been released. Staff have reviewed the surveys and recommend participating in the surveys related to the WSA and RAPA. Draft survey responses can be found in Attachment 1. Survey responses for the proposed changes to the Forest Act have not been prepared, as the amendments are not directly relevant to the City's jurisdiction or operations.

This report provides an overview of the Ministry's initiative in the context of B.C.'s regulatory framework and provides detailed survey input for Council endorsement. This report also seeks endorsement to prepare a letter to the Minister requesting that more meaningful consultation be implemented to support this provincial initiative.

This report supports Council's Strategic Plan 2022-2026 Focus Area #1 Proactive in Stakeholder and Civic Engagement:

*Proactive stakeholder and civic engagement to foster understanding and involvement and advance Richmond's interests.*

*1.1 Continue fostering effective and strategic relationships with other levels of government and Indigenous communities.*

*1.2 Advocate for the needs of Richmond in collaboration with partners and stakeholders.*

This report supports Council's Strategic Plan 2022-2026 Focus Area #5 A Leader in Environmental Sustainability:

*Leadership in environmental sustainability through innovative, sustainable and proactive solutions that mitigate climate change and other environmental impacts.*

*5.2 Support the preservation and enhancement of Richmond's natural environment.*

### Analysis

The Provincial Government is the primary authority for integrated land and resource management in BC, including establishing regulations for land and marine environments, water resources, and biodiversity. The federal government focuses on protecting fish and fish habitat through legislation such as the Fisheries Act and Species at Risk Act, that apply across all jurisdictions, including private and municipal lands. The WSA and RAPA operate in overlapping but distinct ways to manage water resources and protect fish habitat. While the WSA governs

water use, licensing, and the management of watercourses, the RAPA focuses on protecting adjacent riparian areas through requirements applied to local governments and developers. The Ministry is the central authority for both regulations, while local governments are responsible for implementing the *Riparian Areas Protection Regulation* through delegated authority, established in 2016.

Together, the WSA and RAPA form the core regulatory framework by which municipalities plan, review, and authorize activities near water, and related ecosystems. In response, the City has established bylaws, policies, and strategies that align with the provincial legislation, including the Ecological Network Management Strategy, Sustainability Framework, and the Official Community Plan (OCP). These tools help ensure compliance with provincial requirements while further protecting Richmond's unique island environment, sensitive riparian areas and aquatic ecosystems.

The WSA is the Province's primary legislation governing the use and protection of water resources. It regulates surface water and groundwater licensing, water use approvals, changes in and about a stream, and water sustainability planning. Under the WSA, local governments must obtain authorization for activities such as diking and drainage works, culvert installation, and utility construction that have the potential to impact streams or other water bodies. Private property developments that may affect watercourses or groundwater are also subject to WSA requirements; however, it is the responsibility of the landowner or developer to obtain the necessary approvals.

Therefore, any changes to WSA permitting processes will directly impact City infrastructure projects.

The RAPA directs local governments to protect riparian areas during residential, commercial, and industrial development using their authority under Part 14 of the Local Government Act. The regulation establishes a science-based process that local governments apply to conserve riparian areas and ensure development proposals meet provincial standards before approvals are issued. Local governments have primary responsibility for implementing riparian fish habitat protection on private land by incorporating protection measures into local bylaws and permit processes.

The City established its Riparian Management Areas (RMAs) in 2006 through the Riparian Response Strategy, pursuant to the requirements of the RAPA. In 2018, the City incorporated the RMA network into its Zoning Bylaw, which formalized 5 metre and 15 metre setbacks along its minor and major channelized watercourses. On agricultural lands, RMAs may be exempt from an RMA permit depending on the type of permit: residential homes require RMA setbacks, while routine farming activities are generally exempt. The City has dedicated staff resources to uphold RAPA, including the review of development applications and Qualified Professional assessments to ensure compliance with provincial standards.

#### Summary of the Provincial Engagement Process

The Natural Resource Permitting Improvements initiative identifies sixteen topic areas, under the WSA and RAPA. Engagement with local governments is being conducted through a series of surveys and virtual sessions taking place between October 2025 and December 2025.

On October 1, 2025, the Ministry requested the City's participation and introduced sixteen surveys to staff (Attachment 2). The engagement process has been phased. Staff responded to the first phase on October 17, 2025, and issued the memorandum to Council titled: "Update on BC's Natural Resource Permitting Improvements and Engagement", dated October 17, 2025 (Attachment 3). The second phase of survey responses are due December 12, 2025. Staff have been informed that no further engagement is planned after December and prior to introducing regulatory amendments in spring 2026 and legislative amendments in late 2026.

Consultation efforts with the Ministry on this initiative have been complex. Aside from the survey requests, there is very little supporting information available for staff to review and evaluate. Accessing additional information in a timely manner has been further complicated by recent provincial job action, limiting direct communication with Ministry staff.

#### Proposed Provincial Regulatory Changes and Potential Impacts

The proposed changes to the WSA and RAPA are intended to simplify permitting while enhancing environmental protection. For municipalities, the implications extend beyond regulatory processes to include infrastructure planning, capital delivery, and ecosystem management.

Amendments to the WSA that alter approval thresholds, timelines, or Qualified Professional requirements could affect project planning, delivery, and compliance obligations. Adjustments to permitting processes or exemptions could influence flood protection upgrades, infrastructure renewal, and environmental restoration efforts.

Amendments to the RAPA could also directly affect how the City manages riparian and floodplain areas. Adjustments to setback requirements, exemptions for certain activities, or modifications to Qualified Professional roles could alter municipal responsibilities, permitting workflows, and environmental oversight. Any changes to RAPA may require updates to internal review procedures, additional staff coordination, or revisions to municipal standards to remain compliant.

Table 1 summarizes the potential impacts associated with the proposed legislative and regulatory changes. This information reflects staff's current understanding based on materials available to date and will be refined as more details are provided by the Ministry. Additional information on potential benefits and challenges can be found in Attachment 4.

**Table 1: Summary of Municipal Impacts from Proposed WSA and RAPA Amendments**

<b>Service Level</b>	<b>Summary of Potential Impacts</b>
Flood Protection and Diking Projects	Streamlined approvals could accelerate critical flood-protection works; however, reduced provincial oversight may increase local compliance responsibility.
Road and Utility Infrastructure Projects and Maintenance	Standardized permitting may improve project delivery efficiency but could require added internal technical capacity during transition.
Riparian Management Areas	Clearer standards and stronger Qualified Professional accountability could enhance consistency and habitat protection; however, potential changes to include additional wetlands under the WSA may require bylaw updates and may increase staff workload or delay processing of development applications.
Development Review and Permitting	Simplified processes may reduce applicant confusion, but system changes and reduced review windows could create implementation challenges.

The City may experience implementation challenges as new provincial permitting and compliance frameworks are introduced, including staff training, bylaw and process updates, and coordination with the Province. There are no immediate financial impacts associated with endorsing the staff recommendations. However, if the Ministry implements regulatory changes that increase municipal coordination, monitoring, or service delivery requirements, there may be future budget implications related to staff resources, data management, and compliance monitoring.

### Next Steps

With endorsement, staff will submit the survey responses to complete participation in the second phase of engagement. Following engagement, the Ministry anticipates introducing regulatory amendments in spring 2026 and legislative amendments in late 2026 as part of this broader modernization effort.

The need for detailed information on Natural Resource Permitting Improvements remains a priority to understand the full impact on City resources and responsibilities. To address this concern, staff recommend that a letter from the Mayor be sent to the Minister of Water, Land and Resource Stewardship urging the Ministry to share more details on the implementation of future regulatory changes. If endorsed, the letter will be requesting more meaningful consultation, access to technical information, opportunities to comment on draft guidance, and a commitment to consider local government feedback.

## **Financial Impact**

None.

## **Conclusion**

The Natural Resource Permitting Improvements Initiative presents an opportunity to modernize and streamline regulatory processes that are integral to municipal operations.

While the proposed changes to the Water Sustainability Act and Riparian Areas Protection Act may improve coordination and reduce permitting delays, they also carry potential challenges for local governments, including increased administrative responsibilities, uncertainty during implementation, and possible resource impacts.

Given the limited provincial engagement to date, staff recommend that the City continue to advocate for meaningful consultation to ensure that municipal perspectives are fully considered in the development and implementation of new legislation and regulations. Endorsing the staff comments and submitting a formal letter to the Minister will help reinforce Richmond's position as a proactive partner in achieving effective, balanced, and environmentally responsible regulatory modernization



Nadia Chan  
Manager, Environment  
(604-276-4241)

NC:nc

- Att. 1: Draft City of Richmond Responses for Submission December 12, 2025
- 2: List of Natural Resource Permitting Improvements Topics
- 3: Memorandum to Mayor and Councillors - Update on BC's Natural Resource Permitting Improvements and Engagement
- 4: Potential Benefits and Risks of the Proposed Permitting Improvements

## Proposed Survey Responses

### Survey 1: Low volume water use streamlined authorization process

Question:	Do you agree changes are needed to improve permitting for low volume water use in B.C.?
Response:	I am undecided
Question:	What do you think about streamlining the authorization process for low volume water use?
Response:	It is difficult to assess the proposed streamlining of the authorization process for low volume water use as there is not enough information to support a detailed review. One of the pillars of the proposal is that the changes will only be applied to low volume use, which is undefined, and will only be implemented within watersheds/aquifers with enough water supply, which are not identified. An assessment of the province's watersheds for water supply concerns should supersede any regulatory/legislative changes to inform stakeholders regulators on whether changes here are worthwhile. If this information has already been collected and studied, it would be helpful to share this information with stakeholders for their consideration. Richmond has a number of land uses and sectors that may rely on low volume uses including agriculture and small scale commercial operations. It is also unclear which types of water use will be included in the proposed streamlined authorization approach. Will this apply to domestic use, non-domestic use, agricultural use, commercial/industrial use, conservation use, etc.?
Question:	What quantity of water would you consider small in the context of this proposal?
Response:	As local government, we are not involved in the regulation of water use and as such, it is difficult to comment on this question. It seems logical that what is considered as low volume water use may vary between watersheds/aquifers based on water availability, recharge rates, and water use activities. What is considered low volume water use may also vary from industry to industry and user to user. More thought needs to be put into developing a baseline framework for determining low volume use before effective feedback/comment can be provided.
Question:	How might a streamlined process for authorizing low volume water use impact you, your work or your community?
Response:	A streamlined process for authorizing low volume water use has the potential for positive impacts for local governments and community members where there is verified low risk for impacting watersheds/aquifers because of proposed use by reducing lag times between application and license issuance.
Question:	What else should be considered?
Response:	Low lying municipalities within river deltas such as the City of Richmond typically have naturally elevated groundwater conditions when compared to standards such as the BC Water Quality Guidelines. Assessment of the risk related to movement of contaminated groundwater in the context of relaxing regulation on the issuance of licenses should be considered when looking at which watersheds/aquifers these changes are applicable to.
Question:	Please use this space to provide any additional comments, feedback or questions on streamlining low volume water use authorization.
	N/A

### Survey 2: Expediting existing groundwater use applications

Question:	What standard terms or conditions would it be helpful to see included in groundwater licenses not yet been issued?
Response:	It is unclear how adding additional standard terms and conditions would help address the backlog from the submission of approximately 8,000 groundwater licenses following the significant increase in applications in 2022, when many applicants sought to qualify for existing user status to access benefits not available to new users. Applying standard terms and conditions and issuing licenses without detailed application reviews does not appear to be an appropriate solution and could lead to negative impacts on water resources due to insufficient oversight. A key concern is the potential for overutilization of water resources within an aquifer. It is unclear how standard terms and conditions alone could effectively mitigate this risk.
Question:	Please use this space to provide your comments, feedback, questions or concerns on changes to existing use groundwater application
Response:	The large influx of applications to qualify for existing user status and access benefits not available to new water use licenses suggests a significant imbalance between the terms of existing and new

	licenses. Could the Province reconsider the terms of new licenses to encourage applicants to transition into the current licensing framework, which aligns with existing operational capacity, rather than attempting to clear the backlog through a non-standard approach?
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### Survey 3: Best management practices for changes in and about a stream

Question:	How familiar are you with existing provincial best management practice guidance related to WSA section 11 (Changes in and about a Stream)?
Response:	Very familiar
Question:	Have you or your organization successfully applied the General Best Management Practices for permits or works related to Changes in and about a Stream, or the Scope-specific Best Management Practices for Changes in and about a Stream?
Response:	Yes
Question:	If you answered yes to the previous question, please name and list the general or scope-specific best management practices that have been helpful to you or your organization.
Response:	The City of Richmond would typically apply both the general and scope specific BMPs for projects related to drainage and diking maintenance and upgrades. We would apply most if not all the general and scope specific BMPs as our project types are highly variable in complexity and our unique geomorphology with high groundwater levels and proximity to the Fraser River means that we are completing works that interact with water very frequently. These BMPs have been very helpful for establishing baseline standards that we can apply to our drainage and diking works.
Question:	Are you or your organization experiencing any gaps or challenges related to applying best management practices for permits or works related to Changes in and about a Stream?
Response:	Yes
Question:	Are there additional best management practices that should be developed, or substantively revised, to support effective and efficient permitting and project delivery?
Response:	Yes
Question:	If you answered yes to the previous question, please describe your recommendations for new general or scope-specific best management practices that should be developed, or those that should be revised.
Response:	<p>The process for performing necessary maintenance during emergency works is a gap that needs to be addressed. The general and scope specific BMPs provide a pathway to conduct emergency works safely and in an environmentally responsible manner, but the legislation/regulations require very specific scenarios for emergency works to be legally performed (ex. Local state of emergency is required to trigger emergency works for flooding). There should be a more streamlined process developed and formalized for local, regional and first nations governments to perform emergency works to protect life, property, and critical infrastructure during more localized/minor emergency events.</p> <p>In addition to emergency works, there are also challenges in aligning provincial BMPs with municipal maintenance schedules and operational realities. Many local government activities such as routine ditch maintenance, culvert replacement, or sediment removal occur on tight seasonal windows and must consider fish windows, weather, and tide cycles. The time required to confirm applicability of BMPs and obtain necessary approvals can delay critical works and increase costs. Greater clarity on the thresholds between "maintenance," "minor works," and "regulated activities" would help ensure consistent and efficient application of BMPs.</p> <p>BMPs could be expanded to better recognize the operational context of local governments who manage extensive linear infrastructure systems (e.g., dikes, drainage networks, and outfalls). The current BMPs are often written from a project-based lens, while municipalities operate programs involving numerous small, recurring interventions. BMPs tailored to municipal-scale asset management programs would improve efficiency and reduce administrative burden without compromising environmental protection.</p> <p>Consider incorporating adaptive management principles into BMPs, particularly for dike, drainage, and habitat restoration works, allowing municipalities to implement monitoring-based adjustments without re-triggering new permits.</p>
Question:	Please use this space to provide any additional comments, feedback, questions or concerns on the changes to natural resource permitting being explored by the Province.



Response:	As per the engagemnt website, the province is considering more updates to existing best management practices based on new information and gaps or issues in the application process. With these proposed updates, applicants, qualified professionals, and the public could access current, provincially relevant resources that support transparency, consistency, and predictability in permitting projects, including those for changes in and about a stream. No information has been provided on these proposed updates or additions, so it is impossible for stakeholders to provide meaningful feedback on this topic. It is requested that more detailed information be provided to facilitate our review of the proposed updates.
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#### Survey 4: Streamlining routine permitting for changes in and about a stream

Question:	Do you agree changes are needed to improve routine permitting for changes in and about a stream?
Response:	I agree
Question:	How might a change to permitting requirements for routine permitting impact you, your business or your community?
Response:	<p>The introduction of a streamlined permitting process for multi-location, routine projects would provide significant benefits for local governments. Maintenance work related to standard scopes, such as drainage and diking maintenance, often triggers individual notifications or change approvals for multiple sites. A formal process that allows for unified applications across several locations would improve efficiency, reduce administrative burden, and generate cost and time savings while maintaining environmental protection standards.</p> <p>Streamlined permitting would also improve predictability for planning infrastructure maintenance in alignment with seasonal windows, fish windows, and emergency preparedness requirements. For example, annual dike inspections frequently identify minor erosion or debris removal needs at multiple sites; a multi-location permitting framework would allow these routine interventions to proceed more efficiently. Additionally, municipal staff could redirect time saved from repetitive permit administration toward project implementation, monitoring, and public engagement.</p>
Question:	How should the Province manage water use while streamlining the routine permitting process for changes in and about a stream?
Response:	<p>Water use is regulated under a separate legislative and regulatory framework, primarily through the Water Sustainability Act, and is distinct from permitting for changes in and about a stream. Streamlining routine permitting should not affect water use approvals.</p> <p>However, it is important that the streamlined permitting process includes coordination with water use authorities where relevant. For example, if a routine maintenance project intersects with existing water licenses or groundwater extraction, notifications and any necessary conditions should be integrated seamlessly. Streamlined permitting should primarily apply to minor, routine works that are not expected to significantly affect stream flows or existing water users, and guidance should clarify which project types qualify.</p>
Question:	Please use this space to provide any additional comments, feedback, questions or concerns on streamlining routine permitting requirements for changes in and about a stream.
Response:	To ensure consistency and efficiency, streamlined permitting would benefit from clear definitions of "routine" versus "non-routine" works and thresholds for multi-location applications. Providing guidance documents, templates, or checklists for multi-location projects would further support local governments and qualified professionals in preparing complete and compliant applications. Clear, well-communicated criteria and resources would help maintain environmental protection while reducing unnecessary administrative delays.

#### Survey 5: Managing all wetland classes

Question:	Do you support bogs and shallow open waters being subject to the same requirements as other wetland classes currently regulated under the WSA?
Response:	Yes
Question:	Does the inclusion of all wetland classes (such as bogs and shallow open waters) under the WSA impact you, your organization or your interests?
Response:	Yes



Question:	If you answered yes to the previous question, how would including all wetland classes (such as bogs and shallow open waters) under the WSA affect your work or interests?
Response:	<p>The inclusion of bogs under the WSA could have significant implications for Richmond, given the historical prevalence of bogs in the region. This may substantially increase the number of properties subject to WSA requirements, resulting in additional work for the City to ensure compliance, as well as additional regulatory and permitting considerations for private and capital development projects.</p> <p>Approximately 40% of Richmond's land base and historical wetland areas are within the Agricultural Land Reserve (ALR). Clarification is needed regarding the interplay and priority between the proposed WSA changes and the Agricultural Land Commission Act and Regulations.</p> <p>Additionally, consideration should be given to shallow open water wetlands, particularly constructed stormwater ponds and lakes used for flood mitigation and climate adaptation. Distinction needs to be made in the legislative/regulatory changes to ensure that there are clear delineations and different regulatory approaches for natural open water wetlands versus constructed open water wetlands. The City of Richmond has 7 constructed wetlands that primarily serve as green infrastructure for flood protection and require a distinct management approach under the WSA. Perhaps a streamlined permitting or exemption approach can be applied to constructed shallow open water wetlands that serve as green infrastructure.</p>
Question:	What practical impacts - positive or negative - would this change have on your permitting, planning, or stewardship activities?
Response:	<p>Overall, inclusion of all wetland classes aligns with Richmond's Ecological Network Management Strategy and would enhance stewardship outcomes.</p> <p>From a development review perspective, additional staff time would be required to:</p> <ul style="list-style-type: none"> <li>• Clarify and apply protected area requirements under the WSA for development applications.</li> <li>• Determine distinctions between altered and existing bogs.</li> <li>• Educate residents and developers on legislative changes.</li> </ul> <p>Clear criteria for bog identification and application of WSA requirements would help reduce staff workload. From a planning perspective, local governments may need to assess and potentially update bylaws, plans, and programs including the Zoning Bylaw, Official Community Plan, and Development Permit Area Objectives and Guidelines, to ensure compliance and harmonization with WSA changes.</p> <p>This may also trigger additional permitting requirements for developers, particularly in Richmond, where large areas of the island were historically bog environments and non-functional remnants of these bogs remain. Any proposed changes to the WSA should consider potential impacts on development permitting timelines and ensure alignment with provincially mandated housing and development goals.</p>
Question:	How would the inclusion of all wetland classes (such as bogs and shallow open waters) under the WSA affect your ability to protect land that includes wetland features?
Response:	Increasing protection at the provincial level would generally enhance the City's ability to protect wetlands, as it drives local policy updates to align with provincial legislation. It is critical that inclusion of wetland classes within the WSA are implemented in a very clear and concise way to make it as seamless as possible for local governments to integrate these changes into our existing processes.
Question:	What benefits or challenges do you foresee if all wetland classes are treated the same way under the WSA?
Response:	<p>Benefits:</p> <ul style="list-style-type: none"> <li>• A unified approach simplifies wetland protection and may result in greater overall conservation.</li> </ul> <p>Challenges:</p> <ul style="list-style-type: none"> <li>• Wetlands are diverse, and a generalized approach may not fully account for the unique functions of different wetland types.</li> <li>• Human-made wetlands integrated into flood and stormwater infrastructure require distinct management considerations.</li> <li>• Flexibility is needed for individualized assessment in special cases.</li> </ul>

	<ul style="list-style-type: none"> <li>• Clear communication of changes to QEPs, local governments, property owners, and developers will be essential.</li> <li>• Potential for increase in costs and timelines for development to address new regulatory requirements</li> </ul>
Question:	In your opinion, would regulatory and permitting clarity and environmental outcomes be improved if all wetland classes were regulated consistently under the WSA?
Response:	Yes
Question:	Please use this space to share any additional thoughts you have on regulating all wetland classes under the WSA, regulatory and permitting clarity, and environmental outcomes.
Response:	<p>Regulating all wetland classes under the WSA should improve wetland protection and management. Flexibility should be provided for constructed wetlands critical for flood protection and climate adaptation, which require long-term management unlike natural systems.</p> <p>Additionally, clarification is needed on the interaction between WSA changes, stream and wetland management improvements, and the Agricultural Land Commission Act/ALR regulations, as many wetlands overlap with ALR lands.</p>
Question:	Are you concerned about increased permitting complexity or costs if all wetland classes were regulated consistently under the WSA?
Response:	Yes
Question:	If you selected yes in the previous question, what are your concerns and how could they be addressed and/or resolved?
Response:	<p>Concerns:</p> <ul style="list-style-type: none"> <li>• Potential confusion due to unclear requirements.</li> <li>• Increased staff time to explain requirements to applicants.</li> <li>• Additional staff workload to ensure compliance.</li> <li>• Increased administrative timelines, which may result in higher costs for local governments, developers, and end users.</li> </ul> <p>Resolution:</p> <ul style="list-style-type: none"> <li>• Early and comprehensive engagement with QEPs and local governments during development of new guidance materials.</li> <li>• Adequate provincial business analysis to minimize downstream costs.</li> </ul>
Question:	What tools or supports would help you adapt to a robust wetland management framework under the WSA?
Response:	<p>Standardized training and certification for professionals qualified to identify and delineate wetlands.</p> <p>Clear requirements for which QEPs are qualified to identify and delineate wetlands and apply WSA setbacks (consistent with applicable reserved practice i.e. PGA, Applied Biologists Regulation).</p>
Question:	Would you benefit from updated classification tools, clearer definitions, training resources, or other aids? Rank each option with 1 representing the least benefit, and 5 representing the most benefit
Response:	<p>Classification – 4</p> <p>Clearer definitions – 5</p> <p>Training resources – 4</p>
Question:	If you selected other in the previous question, please describe any additional aid(s) that may be helpful in adapting to a more inclusive wetland management framework under the WSA
Response:	N/A
Question:	What guidance would help you or your organization navigate this potential change effectively?
Response:	More engagement in development of the changes/definitions so that we can help identify areas needing more clarification and avoid confusion in the future.
Question:	Are there any additional thoughts you would like to share?
Response:	N/A

#### Survey 6: Applying the mitigation hierarchy for wetland activities

Question:	How strongly do you agree the mitigation hierarchy (avoid, minimize, restore on-site and offset) should be a requirement under the WSA, such as for wetland impacts?
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Response:	Strongly agree
Question:	What challenges and opportunities do you see in requiring the application of the mitigation hierarchy under the WSA?
Response:	<p>There are many positive opportunities and some challenges associated with formally applying the mitigation hierarchy under the WSA. Currently, the hierarchy is briefly referenced in standards and best practices for instream works under the professional reliance model. Clarification is needed on whether a wetland hierarchy would be applied similarly or more formally through legislative/regulatory changes. If the latter, formalizing the hierarchy for streams within the legislation/regulation would also be beneficial. In situations where wetlands also provide fish habitat, the provincial application of a wetland mitigation hierarchy should be in alignment with DFO's application of a fish habitat specific mitigation hierarchy.</p> <p>Roles and responsibilities for reviewing and enforcing the mitigation hierarchy need to be clearly defined, including mechanisms for dispute resolution between provincial staff, federal government, local governments, and QEPs. Many wetlands overlap with agricultural lands, creating potential conflicts; clarity on the WSA's applicability to agricultural properties and its interaction with the Right to Farm Act is required. Additionally, alignment with federal frameworks (e.g., DFO Fisheries Act), existing BMPs, and recognized mitigation approaches would help reduce duplication and support consistent implementation.</p> <p>Strategic use of offset payments should also be clarified, as it is not typically part of other well-established mitigation hierarchies.</p>
Question:	How might requiring the application of the mitigation hierarchy under the WSA impact you, your organization, or your community?
Response:	<p>Applying the mitigation hierarchy may affect local government development permitting processes, requiring staff training and education for QEPs, property owners, and developers. There is a risk that additional requirements could lengthen permit approval timelines if extra coordination between levels of government is needed.</p> <p>For capital projects, most City of Richmond works affecting streams and wetlands already require WSA Change Approval and DFO Authorization, and the mitigation hierarchy is effectively applied under those processes. Examples include dike maintenance, drainage upgrades, and constructed stormwater wetlands interacting with natural wetlands. With proper guidance, we anticipate no major issues in implementing the hierarchy for municipal projects. Standardized training modules for staff, QEPs, and developers would help ensure consistent understanding and application.</p>
Question:	What key ideas should be included in wetland-specific mitigation guidance to support the application of the mitigation hierarchy?
Response:	<p>A wetland-specific mitigation guidebook would be very beneficial. Key elements should include:</p> <ul style="list-style-type: none"> <li>• Clear definitions of each protected wetland type.</li> <li>• Explicit criteria for who can apply the mitigation hierarchy (e.g., QEP with specific specialty).</li> <li>• Clear instructions for delineation, required setbacks, and mitigation measures.</li> <li>• In-kind and out-of-kind offset approaches and standards.</li> <li>• Protocols on when offset payments are acceptable.</li> <li>• Monitoring protocols and adaptive management procedures to ensure mitigation outcomes are achieved and maintained over time.</li> <li>• Consideration of mechanisms to address potential undue hardship for landowners, such as in-lieu fees, offset credits, or other flexible approaches.</li> </ul>
Question:	What challenges and opportunities do you see in providing wetland-specific mitigation guidance?
Response:	While there could possibly be a net gain in wetland retention resulting from wetland-specific mitigation guidance, there may also be owners of properties that find they are undevelopable due to the presence of a (newly categorized) protected wetland where they had previously expected to be able to build. How will potential undue hardship be addressed through this proposed new approach? A potential baseline for addressing undue hardship is the approach outlined in the RAPR.
Question:	What steps should be taken to ensure the development of the guidance is both scientifically sound and practical to implement?
Response:	There are a number of steps that can be taken to ensure that the development of the guidance is both scientifically sound and practical. Mitigation hierarchies are widely recognized frameworks

	and there are many examples of these frameworks implemented globally. Careful review and assessment of current frameworks can provide a baseline standard to build this new wetland guidance standard. Careful development of the guidance should still be undertaken by qualified professionals working within their area of practice. Frequent and meaningful engagement with partners as the guidance is being developed will be critical to prevent confusion and misunderstandings with implementation.
Question:	Please share any additional comments, feedback, questions or concerns you have on requiring the application of the mitigation hierarchy under the WSA or developing wetland-specific mitigation guidance.
Response:	Ongoing engagement and coordination with local governments and QEPs will be critical for effective implementation. Clear communication, training, and alignment with federal and provincial frameworks will help ensure the hierarchy is applied consistently and achieves intended environmental outcomes.

#### Survey 7 – Strategic use of offset payments to support wetland conservation

Question:	The Province is looking at ways to better protect wetlands when development or other activities cause unavoidable impacts. One idea is to use offset payments, where developers contribute funds to support wetland conservation or enhancement projects that replace lost wetland benefits (habitat, drought and flood resilience, etc.). What should the Province consider to make sure offset payments lead to the best possible outcomes for wetland conservation?
Response:	<p>As the Province considers the idea of using offset payments where developers can contribute funds to support wetland conservation, considerations to the following should be made to ensure that offset payments lead to the best possible outcomes:</p> <ul style="list-style-type: none"> <li>• Inventory and prioritization of important streams and wetlands for conservation and restoration should be done on a regional and/or watershed level to better inform decision-making processes on whether offset payments are appropriate on a project-by-project basis.</li> <li>• Ensure consultation/collaboration with conservation groups, local governments and other stakeholders that may be working on restoration projects in the area to ensure maximum benefit for the environment and avoid duplication of efforts.</li> <li>• A standardized approach using the scientific method will need to be established to delineate wetland features, catalog exact areas of impacts and required offset areas, convert habitat values to monetary values, and ensure that monetary contingencies are in place to cover uncertainties.</li> <li>• The approval of offset payments, the administration of the allocation/spending of the payments, the locations where the money will be spent, the project management of the delivery of the offsetting/conservation work and the long-term monitoring and maintenance needs to be the responsibility of the province and should not be downloaded to local governments to manage.</li> <li>• Conservation work funded by the payment system should aim to deliver projects in the same region/watershed that the initial impact took place in. A detailed tracking system will need to be developed and implemented to ensure that funds are distributed equitably and equally with the minimum goal of a no-net-loss approach within a region/watershed.</li> <li>• Cost estimates that support offset payments for future conservation works should include costs for site preparation, project delivery, follow up monitoring and ongoing maintenance to ensure the Province is collecting enough money from proponents to deliver effective future projects. The Province should consider adding an inflation adjustment to the payments based on anticipated time lag of future project delivery as money contributed today will not go as far in the future</li> </ul>
Question:	Are there any considerations or criteria for when offset payments are not appropriate?
Response:	<p>Offset payments should only be used as a last resort in alignment with the mitigation hierarchy—avoid, minimize, restore, then offset. They are not appropriate where:</p> <ul style="list-style-type: none"> <li>• On-site or physical offsetting is feasible and would provide equal or greater ecological benefit.</li> <li>• Projects trigger federal or local regulatory processes (e.g., Fisheries Act, RAPR) that already require physical offsetting measures.</li> </ul>

	<ul style="list-style-type: none"> <li>• Cumulative watershed impacts are significant or poorly understood, and additional losses would meaningfully degrade regional ecological function.</li> <li>• There is insufficient baseline data or monitoring capacity to ensure offset equivalency and accountability.</li> <li>• There is insufficient inventory of Provincial Crown Land to accept offsetting and conservation projects for a particular watershed or region.</li> </ul> <p>To avoid unintended consequences, the Province should apply a regional cumulative effects assessment framework to determine when offset payments are inappropriate or would risk overall wetland loss.</p>
Question:	What additional safeguards and accountability mechanisms might be needed to support conservation outcomes when using wetland offset payments, particularly when payments may be pooled and implemented by third parties (e.g., indemnity agreements, or other forms of security from proponents)?
Response:	<p>There are many safeguards and accountability mechanisms that may be needed in order to support conservation outcomes when using wetland offset payments and it would not likely be a standard approach; as each region/watershed is unique and will need it's own set of conservation goals and risks that need to be assessed. Some safeguards and accountability mechanisms that can be explored could include:</p> <p>Key mechanisms:</p> <ul style="list-style-type: none"> <li>• Individual assessment and classification of watersheds to determine risk level (low, medium, high) for implementing an offset payment approach should be undertaken to address the unique characteristics of each region. Where there is high risk of cumulative impacts diminishing a watershed's function, offset payments should not be utilized as an appropriate mechanism to streamline permitting.</li> <li>• Development of an implementation approach which ensures that the offsets that do get installed utilizing the provincial conservation fund will benefit the same watershed that was affected by the works,</li> <li>• Development of an assessment tool which identifies whether wetland features targeted for the offset payment approach are critical for flood protection or climate adaptation for any proximal communities. Using offsetting payments should be immediate and provide a net benefit for flood protection for the impacted communities.</li> <li>• Conservation covenants should be used as a tool to protect wetland offsets in perpetuity once funds are pooled, and an offset project is delivered at a selected site. Covenants are useful tools as they are attached to land title and follow ownership as lands transact and change hands.</li> <li>• Ownership of the lands where pooled funds are used should be considered carefully prior to the implementation of a project. Ideally, projects would be delivered on Provincial Crown Lands to ensure that the Province has greater ability to manage and protect the offset works in perpetuity. This responsibility should not be downloaded to third parties.</li> </ul>
Question:	In addition to existing governance structures, partnerships, or agreements in place, how should the Province best work with other governments (federal, local, First Nations) in deciding how and where offset payments for wetlands conservation are applied?
Response:	The Province needs to take the lead on this initiative and determine an approach and implementation that works with all other levels of governments including federal, regional, local and First Nations governments. At current funding and resource levels, the City of Richmond would not have the capacity to manage and maintain offset projects delivered within our jurisdiction by a provincially led compensation fund in perpetuity. Constraints are likely to be different for each individual government, so open and ongoing communication and consultation will be needed to ensure that each individual conservation offset project is delivered successfully. Much more work needs to be done in this area prior to any sort of regulatory/legislative change and implementation.
Question:	What oversight and responsibility need to be in place to ensure the intended conservation benefits are achieved?
Response:	<p>There are a number of oversights and responsibilities that need to be put into place to ensure that intended benefits are achieved. Some of these include:</p> <ul style="list-style-type: none"> <li>• Detailed database of all provincial watersheds with assessments completed to quantify risk to watersheds from development impacts and inform the Province of feasibility of implementing offset payments.</li> </ul>



	<ul style="list-style-type: none"> <li>• Clear delineation of responsibilities for all aspects of the management of the conservations/offsetting funds, delivery of the future projects, and long-term management of projects.</li> <li>• A reporting system to track the success of habitat conservation/offset projects that are delivered and managed by third parties.</li> <li>• An inventory/atlas system using detailed mapping to help manage projects and assess for cumulative impacts.</li> </ul> <p>Has the Province given thought to establishing an alternate offsetting system that is more like a habitat bank where habitat credits are developed in advance and allow for the debiting of credits for future project impacts when needed? There are pros and cons to both a bank versus a fund based approach, but we believe that that analysis should be done prior to committing fully to the direction of implementing a fund based approach.</p>
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#### Survey 8 – Wetland identification and delineation manual

Question:	Have you previously used any wetland identification and delineation methods in B.C.?
Response:	No
Question:	What types of support would help you, your organization, or your community apply the new identification and delineation manual effectively (select all that apply)?
Response:	<ul style="list-style-type: none"> <li>• Training sessions for local governments and qualified professionals once the legislative/regulatory changes are complete, but prior to implementation of the changes.</li> <li>• Technical support or a help desk to assist municipal staff and consultants during the initial rollout.</li> <li>• Workshops or peer-learning networks for QEPs, municipal staff, and consultants to share experiences in applying the manual in different ecological zones.</li> <li>• GIS-compatible datasets and tools aligned with municipal systems for seamless integration of delineation outputs into planning, infrastructure, and asset management workflows.</li> <li>• Accessible online guidance documents and case studies illustrating manual application in highly urbanized and developed contexts (such as Richmond).</li> <li>• Field templates to standardize approaches for identification and delineation.</li> </ul>
Question:	What role should professional associations or certifying bodies play in supporting the rollout and use of the new Wetland Identification and Delineation Manual (select all that apply)?
Response:	<ul style="list-style-type: none"> <li>• Develop and offer certification programs or competency modules specific to wetland identification and delineation in B.C. to support professionals applying the manual.</li> <li>• Work collaboratively with the Province and local governments to review feedback from the field and update the manual or supporting tools accordingly.</li> <li>• Provide ongoing professional development</li> <li>• Oversight</li> <li>• Maintaining standards of practice</li> </ul>
Question:	What role should professional associations or certifying bodies play in supporting the rollout and use of the new Wetland Identification and Delineation Manual (select all that apply)?
Response:	Mandatory use
Question:	What benefits or drawbacks do you see in a mandatory approach, including impacts to implementation?
Response:	<p>Benefits:</p> <ul style="list-style-type: none"> <li>• Promotes consistent and science-based delineation across municipalities and project types.</li> <li>• Raises confidence in regulatory decisions and provides clarity for applicants, regulators, and municipalities.</li> <li>• Helps reduce conflicting delineation outcomes and associated delays in permitting.</li> </ul> <p>Drawbacks:</p> <ul style="list-style-type: none"> <li>• Could impose higher upfront training costs or require more professional resources, which may challenge smaller municipalities or organizations.</li> </ul>

	<ul style="list-style-type: none"> <li>• A mandatory standard may create delays during the transition period while professionals and municipalities adapt to new requirements.</li> <li>• There is potential for the professional pool to be temporarily constrained during initial phases if mandatory certification is required.</li> </ul>
Question:	What benefits or drawbacks do you see in a best practice approach, including impacts to implementation?
Response:	<p>Benefits:</p> <ul style="list-style-type: none"> <li>• Allows flexibility and graduated adoption by municipalities and professionals, especially during the early implementation phase.</li> <li>• Reduces immediate burden or cost on municipalities and smaller organizations while they adapt to the new manual</li> </ul> <p>Drawbacks:</p> <ul style="list-style-type: none"> <li>• Without mandatory uptake, there is a risk of inconsistent delineation methods persisting across projects and jurisdictions, which undermines one of the key objectives of the manual (consistency and transparency).</li> <li>• May lead to ambiguity for applicants or regulators when methods vary and could increase review time or challenge enforcement.</li> </ul>
Question:	Are there barriers that might prevent smaller organizations or communities from using the manual effectively?
Response:	Yes
Question:	If you answered yes to the previous question, how can these barriers be addressed to support equitable access and participation?
Response:	<ul style="list-style-type: none"> <li>• Limited staffing or specialist knowledge – provide low-cost training and resources</li> <li>• Develop workflows or checklists</li> <li>• Ensure the manual includes guidance and examples relevant to urban, highly modified, and low-lying jurisdictions (such as Richmond) to make it more broadly applicable</li> </ul>
Question:	Should the Province require the submission of wetland identification and delineation data results for Water Sustainability Act and Riparian Areas Protection Regulation applications?
Response:	Yes
Question:	If yes, what types of data should be submitted as part of WSA and RAPR applications?
Response:	<p>Given our highly urban context, data related to restoration and regeneration should be an equal or greater focus relative to a base-line data assessment of the current conditions. This has multiple implications, not the least of which is the elevation of environmental outcomes and the length of time (# of years) the municipality can hold financial securities related to restoration efforts and plantings survival.</p> <p>Data for submission:</p> <ul style="list-style-type: none"> <li>• Hydrology, vegetation, wildlife and soil field data supporting delineation decisions</li> <li>• Restoration metrics and planned monitoring and maintenance commitments</li> <li>• Documentation of the delineation process to ensure repeatability and defensibility</li> <li>• Long-term maintenance and monitoring plans for restored wetlands, including duration of securities or land-use commitments</li> </ul>
Question:	If the Province manages wetland identification and delineation data, what privacy or data sensitivity concerns should be considered when sharing the data publicly or across agencies?
Response:	<ul style="list-style-type: none"> <li>• Protection of sensitive ecological locations (e.g., rare species habitat, culturally-significant Indigenous sites) may warrant restricted or controlled access to precise coordinates.</li> <li>• Data-sharing agreements between the Province, municipalities, First Nations, and other stakeholders should clarify permitted uses, responsibilities for data quality, and access controls.</li> <li>• Clear protocols for anonymization where necessary (e.g., landowner information, private property assessments) while still retaining ecological value of the dataset.</li> <li>• Ensure alignment with provincial privacy policy</li> </ul>
Question:	Are there specific types of data that should be restricted or anonymized?

Response:	No, from the municipal perspective, broad transparency is preferred to support sound planning, stewardship, and inter-jurisdictional coordination. Access to comprehensive delineation data enhances municipal capacity to integrate wetland information with asset management, flood risk, stormwater, and ecological network management. However, we recognize that certain highly sensitive ecological or cultural features may need controlled access protocols rather than full public release.
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#### Survey 9 - Wetland professional accountability

Question:	How strongly do you agree that wetlands-related assessments and permit applications should only be conducted by professionals that meet specific knowledge, skill, and experience requirements in B.C.?
Response:	Strongly agree
Question:	How strongly do you agree that the WSA should explicitly define who qualifies as a "Qualified Professional" for wetlands related activities?
Response:	Strongly agree
Question:	What challenges or concerns do you foresee in implementing a Qualified Professional definition in the wetlands' context?
Response:	<ul style="list-style-type: none"> <li>• Determining specific qualifications, training, and experience for different wetland types (bogs, marshes, shallow open water, constructed wetlands) could be complex.</li> <li>• Risk of limiting the pool of qualified professionals, potentially increasing costs or timelines for municipalities, developers, and landowners.</li> <li>• Need to coordinate with other professional regulatory bodies (e.g., Applied Science Technologists &amp; Technicians, professional biologists) to ensure consistency and avoid overlapping regulations.</li> <li>• Wetlands are diverse and dynamic; ongoing competency and continuing education will be required to stay current on science, regulations, and best practices.</li> <li>• Potential confusion if provincial definitions conflict with qualifications used under other statutes (e.g., Fisheries Act, local bylaws, etc.).</li> </ul>
Question:	What benefits or opportunities do you foresee in implementing a Qualified Professional definition in the wetlands' context?
Response:	<ul style="list-style-type: none"> <li>• Promotes high-quality, consistent, and scientifically defensible assessments that support local government decision-making.</li> <li>• Reduces liability for municipalities by ensuring projects are reviewed by professionals with appropriate expertise.</li> <li>• Improves regulatory efficiency: clearly qualified professionals reduce repeated reviews, clarification requests, or conflict resolution.</li> <li>• Supports professional accountability and enforcement with clear standards of practice.</li> <li>• Facilitates training and capacity-building programs, aligning skills with provincial priorities and local government needs.</li> <li>• Encourages integration of wetland assessments with broader planning and environmental management frameworks, including flood mitigation and climate adaptation.</li> </ul>
Question:	Please provide any additional thoughts or comments on defining a "Qualified Professional" related specifically to regulating wetland activities under the WSA
Response:	<ul style="list-style-type: none"> <li>• Definitions should be clear, consistent, and practical to implement, with guidance on scope of practice for different wetland types.</li> <li>• Local governments should be engaged in establishing QP definitions to ensure alignment with municipal responsibilities and permit review processes.</li> <li>• Consider tiered qualifications or specializations depending on wetland type, assessment complexity, or work type (assessment, restoration, monitoring).</li> <li>• Integration with other professional regulatory systems (biologists, applied science technologists, engineers) can help avoid duplication or confusion.</li> <li>• Communication and transparency of QP standards will help developers, landowners, and municipalities understand roles, responsibilities, and expectations.</li> </ul>



	<ul style="list-style-type: none"><li>• Mechanisms for ongoing competency, continuing education, and professional accountability will support reliable, consistent, and scientifically sound wetland management.</li></ul>
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### List of Natural Resource Permitting Improvement Topics

Permitting Improvement Topics	Intended Regulatory Review
Exemption for construction dewatering	Exploring options to reduce authorization requirements for construction projects encountering groundwater.
Low volume water use without an authorization	Considering updates to allow small groundwater withdrawals without requiring a provincial authorization.
Exemption for constructing ice roads to access restoration sites	Not applicable.
Administrative penalties timelines	Exploring ways to align <i>Water Sustainability Act</i> administrative penalty timelines and processes with other natural resource statutes.
Expanding eligibility for stream restoration activities	Considering opportunities for qualified proponents to carry out stream channel and fish habitat restoration and maintenance projects.
Riparian Areas Protection Regulation enhancements	Exploring expanded exemptions for low-risk activities, introducing flexibility for recovery efforts, and clarifying missing or ambiguous definitions.
Low volume water use streamline authorization process	Developing a new review process for small withdrawals from streams or aquifers where impacts on other users, land, or the environment are minimal.
Expediting existing use groundwater applications	Exploring streamlining the review and decision process for existing-use groundwater applications.
Best management practices for changes in and about a stream	Updating guidance to address gaps in current application processes.
Streamlining routine permitting for changes in and about a stream	Exploring a single application process covering project design, best management practices, mitigation, and monitoring for multiple or recurring works.
Managing all wetland classes	Considering including all wetland types, including bogs and shallow open waters, under the WSA for consistent stewardship
Applying the mitigation hierarchy for wetland activities	Exploring improved application of the “avoid, minimize, restore-on-site, offset” hierarchy for wetland-impacting activities.
Strategic use of offset payments to support wetland conservation	Considering using compensation measures and offset payments to support wetland restoration and conservation efforts.
Wetland identification and delineation manual	Developing a science-based manual for identifying wetlands and determining their boundaries.
Wetland professional accountability	Exploring definitions of qualified professionals and assurance statement requirements for work in and around wetlands.
Streamlining Forest Act permitting in Ministry of Transportation and Transit Right of Ways	Exploring more efficient permitting for linear utility projects (pipelines, transmission lines) crossing Crown land and provincial highway lands managed by the BC Transportation Financing Authority.



**City of  
Richmond**



**TO: MAYOR & EACH  
COUNCILLOR  
FROM: CITY CLERK'S OFFICE**

## **Memorandum**

Engineering and Public Works  
Climate and Environment

**To:** Mayor and Councillors **Date:** October 17, 2025  
**From:** Nadia Chan **File:** 10-6125-01/2025-Vol 01  
Manager, Environment  
**Re:** **Update on BC's Natural Resource Permitting Improvements and Engagement**

This memorandum provides information on the Province's request for the City to provide comments on *Natural Resource Permitting Improvements*, led by the Ministry of Water, Land and Resource Stewardship (the Province). It also outlines survey responses that staff have submitted to the Province, on behalf of the City, to meet the provincial survey deadline.

The *Riparian Areas Protection Regulation* (RAPR) and *Water Sustainability Act* (WSA) are the primary provincial frameworks that regulate activities or development near watercourses and the use of BC's natural water resources. RAPR applies to private development and places responsibility on Local Governments to ensure compliance with provincial riparian protection requirements during development review and construction activities. WSA governs both municipal and private works, requiring provincial authorizations or adherence to specific procedures for activities such as drainage maintenance, culvert replacements, dike upgrades, or habitat restoration. Any proposed changes to these frameworks could influence the timing, cost, and oversight requirements of municipal maintenance and capital works, and may also affect the level of responsibility municipalities hold for ensuring compliance in private development projects.

On October 1, 2025, the Province formally requested the City's participation and introduced a survey to staff on the matter. The provincial engagement process has been phased, with comments on the first phase due on October 17, 2025, and the second phase due on December 2, 2025. Final regulatory changes for the RAPR are proposed for late-spring 2026 and late-fall 2026 for the WSA.

Detailed technical documentation and implementation guidance have not yet been released by the Province. Staff are working to understand the full scope and intent of the proposed regulatory changes, however information remains limited. Difficulties accessing information and receiving timely responses from provincial staff have been further compounded by the current job action among provincial employees.

Based on the information available, a review of the proposed updates and have generated comments to complete the provincial survey for the first phase of engagement (Attachment 1). The proposed changes, covering sixteen focus areas (Attachment 2), are intended to improve permit times for applicants, including the City. This includes simplifying coordination with provincial regulators, reducing delays for low-risk projects, and offering more flexibility for activities such as infrastructure maintenance or habitat restoration.

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However, the initial review also suggests that the proposed updates may be intended to reduce provincial oversight in certain cases, which may have implications for environmental protection in sensitive riparian and wetland areas. It is not yet clear whether these changes could shift additional responsibilities to Local Governments by potentially adding additional municipal oversight, resources, or staffing to ensure regulatory compliance for provincial legislation.

The comments, on behalf of the City, reflect the City's interests to expedite provincial permits to avoid project delays. An emphasis for the need for early and meaningful engagement with Local Governments for regulatory updates that will increase municipal oversight to govern provincial compliance has also been included.

To meet the provincial timelines for the first phase of engagement, staff have submitted the survey responses in Attachment 1. For the second phase of engagement, due in December 2025, staff will prepare a report for Council's consideration, including analysis of potential operational, environmental, and resource implications for the City based on more detailed provincial information that is not available at this time.

Should you have questions regarding this information, please contact Nadia Chan directly at 604-276-4241.



Nadia Chan  
Manager, Environment  
(604-276-4241)

Nc:nc

Att. 1: City of Richmond: Staff Responses  
2: List of Natural Resource Permitting Improvement Topics

pc: SMT  
Suzanne Bycraft, Director, Public Works  
Milton Chan, Director, Engineering  
Todd Gross, Director, Parks Services  
Jason Kita, Director, Intergovernmental Relations & Corporate & Strategic Planning  
Martin Younis, Director, Facilities & Project Development

## City of Richmond: Staff Responses

### Survey 1: Exemption for Construction Dewatering

**Question:** How might a change to construction dewatering authorization impact you, your organization or your community?

**Response:** Without regulatory oversight through the Section 10 Short-Term Water Use Approval process, multiple uncoordinated construction projects in an area could have significant cumulative impacts on localized groundwater resources. These impacts could include subsidence affecting adjacent structures and foundations, underground utilities, urban trees, green infrastructure, and nearby surface waters such as streams and wetlands.

The proposed three-tiered, risk-based approach for exemption, notification, and authorization based on construction dewatering flow rates does mitigate this concern to some extent. However, if the Province steps back from regulating low-risk construction dewatering through the proposed exemption process, municipalities may become the de facto managers of a process outside their jurisdiction and legal authority. The Province must ensure an effective enforcement and oversight system that balances development needs and environmental protection pragmatically.

**Question:** How might low, medium and high-risk construction dewatering activities be identified?

**Response:** Identification of risk levels will require proponents to retain qualified geotechnical and civil engineering professionals to conduct site-specific seepage analyses and determine natural groundwater infiltration rates into excavation areas. Regulators should also require proponents and their consultants to describe whether the project involves passive or active (well-point) dewatering, as active pumping can significantly influence groundwater extraction rates.

In addition, regulators should consider post-construction site conditions. For example, fully waterproofed structures such as parkades can result in a permanent reduction of localized groundwater storage capacity. Cumulative effects related to long-term groundwater loss should therefore be a key consideration in defining risk levels.

Clear guidelines defining Tier 1, 2, and 3 thresholds should be included in the consultation process and be developed in a manner that reduces unnecessary project costs or delays.

**Question:** How might we ensure that a change is user-friendly and easy for applicants to understand?

**Response:** Providing clear and concise technical guidance will be critical to ensure the process is user-friendly with additional provincial staff resourcing. Because qualified professionals will typically prepare applications, the Province should develop and deliver training and information sessions for the professional community to ensure consistent understanding and uptake of the new framework.

The Province should also recognize the time-sensitive nature of construction projects and ensure that review and approval timelines are aligned with typical construction schedules. If permit turnaround times are not predictable or efficient, non-compliance with Section 10 of the WSA may persist despite regulatory changes.

**Question:** Do you agree changes are needed to improve permitting associated with construction dewatering?

**Response:** Yes

**Question:** Do you agree with the concept of allowing some low-risk construction dewatering activities to proceed without an authorization from the Province?

**Response:** Yes

**Question:** Do you have any concerns regarding a change to construction dewatering?

**Response:** No

**Question:** What else should be considered?

**Response:** The Province should consider making data from projects requiring notification (Tier 2) and authorization (Tier 3) publicly accessible through tools such as iMapBC. This would enable local governments, professionals, and proponents to review localized groundwater information collected through these projects. Cumulative impacts related to groundwater drawdown and settlement should also be a key consideration when evaluating the effectiveness of the proposed risk-based approach.

## Survey 2: Low Volume Water Use Without an Authorization

**Question:** Do you agree that changes are needed to improve low volume groundwater permitting in B.C.?

**Response:** Yes

**Question:** How might a change to low volume groundwater permitting impact you, your work, or your community?

**Response:** Due to Richmond's geomorphology, local groundwater contains naturally elevated background metal concentrations, which may make it unsuitable for agricultural, commercial, or industrial use. Testing and confirmation of suitability, typically required during authorization, would not occur under a low-volume exemption. To balance development timelines and environmental protection detailed guidelines, that consider local conditions and scenarios, are needed. Without science-based guidance, Local Governments and professionals will be responsible for developing best practices that will inevitably vary between municipalities and adding further confusion for development. How will these risks be mitigated?

**Question:** Do you agree with the concept of allowing non-domestic groundwater uses under 2 cubic metres per day (approximately the equivalent of 1.5 hot tubs of water per day or drinking water for 40 head of cattle per day) without requiring an authorization from the Province?

**Response:** Yes

**Question:** Do you have any concerns with allowing non-domestic groundwater uses under 2 cubic metres per day (approximately the equivalent of 1.5 hot tubs of water per day or drinking water for 40 head of cattle per day) without requiring an authorization from the Province?

**Response:** Yes

**Question:** If you answered yes to the question above, please share your concerns.

**Response:** The proposed approach raises several concerns, particularly given the lack of technical detail provided through the engagement materials. Key issues include:

- Reduced ability to manage aquifer levels proactively:  
Removing authorization requirements would reduce available data on water withdrawals, limiting the Province's capacity to manage aquifers effectively and forcing a reactive approach.
- Loss of oversight on water use and discharge:  
Regulation is most effective at the diversion stage, where oversight ensures downstream water use and disposal are properly managed. Without authorization triggers, risks increase for unauthorized discharges or mismanagement of process water that could lead to soil and groundwater contamination.
- Movement of contaminated groundwater:  
Low-volume withdrawals from sites with historical or existing contamination could mobilize pollutants into aquifers or stormwater systems.



Without WSA oversight or SiteID/SDS triggers, local governments would lack mechanisms to identify or manage these risks.

How will the Province ensure these contamination and oversight risks are mitigated if exemptions are introduced?

**Question:** How might your concerns be mitigated?

**Response:** Meaningful mitigation advice is difficult without clarity on the scope and implementation of the proposed changes. The Province should provide detailed, technical information on the proposed framework before seeking feedback. With a clear understanding of the intent and process, stakeholders can provide more targeted, constructive input on risk mitigation and management options.

**Question:** Please share your ideas for environmental protections should some low volume water use no longer require an authorization from the province.

**Response:** Any exemption should be applied based on aquifer or watershed-specific conditions using a scientific, risk-based approach rather than a blanket policy.

Non-domestic low-volume users should still be required to notify the Province of any groundwater connection, and the Province must maintain the authority to suspend or terminate use where aquifer health or community water security are at risk.

**Question:** What else should be considered?

**Response:** To address contamination risk, exemptions should also consider zoning. Exemptions should not apply to non-domestic groundwater use on lands zoned for agricultural, commercial, or industrial purposes, where the potential for contamination is higher. These users should continue to require authorization. Exemptions could be limited to low risk uses on residential or institutional lands, such as home-based businesses or institutional operations, where contamination risk is significantly lower.

### Survey 3: Administrative Penalties Timelines

**Question:** Please share your thoughts on potential impacts should the timeline for imposing administrative penalties under the WSA be extended to match the timeline with other laws.

**Response:** No detailed engagement materials were provided through the online portal outlining the differences between the WSA's current timelines for imposing administrative penalties and those under other legislation such as the *Wildlife Act* or *Forest and Range Practices Act*. It appears the intent is to extend the existing three-year timeline under the WSA.

Extending this timeline could improve regulatory enforcement by allowing penalties for infractions discovered after a longer period. However, once an infraction is identified, clear timelines should also be established for the responsible party to remedy the violation and settle any penalties. This would provide compliance officers with more effective tools to ensure water-related infractions are addressed in a timely and responsible manner.

**Question:** Please share any additional comments on what you think is a reasonable amount of time for the application of penalties and any rationale, feedback, questions or concerns on changes to the administrative penalties timeline under the WSA

**Response:** No background information or rationale for the proposed timeline changes was provided by provincial staff, making it difficult to assess what would constitute a "reasonable" timeframe. This context should be clearly communicated to stakeholders before feedback is requested. More information on the intent, comparative timelines, and expected outcomes of any proposed change is needed to support meaningful review and comment.

#### Survey 4: Expanding Eligibility for Stream Restoration Activities

**Question:** What qualifications, experience, or local knowledge should be required for those designing, implementing or carrying out stream restoration activities?

**Response:** Individuals responsible for the design and implementation of stream restoration should, at minimum, meet the definition of a *Qualified Environmental Professional (QEP)* as defined under the RAPA/RAPR. The WSA/WSR should explicitly identify the professional designations authorized to provide services under the Act.

Those carrying out the physical works should have demonstrated experience delivering successful restoration projects and operate under the supervision of a project QEP.

Currently, certain qualified proponents (federal, provincial, and local governments) may undertake restoration, or maintenance works under a notification process rather than a change approval. If eligibility for this streamlined process is expanded, the WSA/WSR should clearly define the term *Qualified Proponent* and outline the required credentials, experience, and accountability mechanisms.

**Question:** Do you agree that changes are needed to improve permitting for stream restoration and maintenance?

**Response:** Yes

**Question:** Are there specific stream channel or fish habitat restoration or maintenance activities you believe should be avoided or limited?

**Response:** Yes

**Question:** If you answered yes to the question above, please identify the specific stream channel or fish habitat restoration or maintenance activities you believe should be avoided or limited.

**Response:** Under the current model, non-government proponents must partner with local governments to perform stream works within municipal boundaries. This partnership provides an essential regulatory checkpoint for works affecting designated streams that often function as critical drainage infrastructure.

If new processes allow proponents to proceed through simple provincial notification, local governments risk losing oversight of works that affect systems vital for flood protection and public safety. Clear requirements for coordination with local governments must be maintained to ensure that ecological and drainage functions are both protected.

**Question:** Please share your perspective on why some stream channel or fish habitat restoration or maintenance activities should be avoided or limited.

**Response:** The concern is not with specific activities, but with ensuring that only capable and accountable organizations undertake restoration or maintenance work. Long-term monitoring and maintenance are essential to restoration success yet often underfunded or overlooked. Poorly maintained projects can degrade habitat conditions rather than improve them.

If eligibility for the streamlined notification process is expanded to non-government proponents, the Province should ensure those proponents have the resources, staffing, and financial capacity for long-term maintenance and monitoring. Without this, local governments may be left responsible for the ongoing maintenance of failed projects in



critical drainage systems, without prior involvement or funding. Updates to the process should clearly address how these risks will be mitigated.

**Question:** What, in your mind, is a good way to distinguish between stream restoration and stream maintenance?

**Response:** Maintenance: Activities that improve or preserve the *existing* form and function of a stream without significant physical alteration.

Restoration: Activities that *significantly alter* the physical form and function of a stream to re-establish natural processes or habitat.

**Question:** How might the distinction between stream restoration and stream maintenance affect how activities are planned or regulated?

**Response:** A clear distinction between restoration and maintenance is essential for effective regulation.

A streamlined pathway for qualified proponents to conduct *maintenance* activities could balance ecological improvement with reduced regulatory burden, provided stakeholder notification to local governments remains a requirement.

*Restoration* activities, however, should continue to require stronger regulatory oversight to ensure proper stakeholder engagement, establish monitoring and maintenance obligations, and secure necessary financial or performance guarantees to ensure project success and long-term ecological integrity.

#### Survey 5: Riparian Areas Protection Regulation Enhancements

**Question:** The Province is exploring definitions for “ditch”, “surface flow of a stream”, “riparian restoration”, “institutional development” and “invasive species”. Are there any additional definitions you feel should be clarified or added in the Riparian Area Protection Regulation (RAPR)?

**Response:** Watercourse, body of water, undue hardship, protected fish

**Question:** Are there any types of works you think should be exempt from RAPR?

**Response:** Yes

**Question:** If you answered yes to the question above, please describe the types of works you think should be exempt from RAPR.

**Response:** Upland riparian restoration performed under the supervision of a Qualified Environmental Professional should be exempt from RAPR, provided an adequate notification process is implemented. This process should ensure that restoration projects are properly monitored and maintained so that vegetation establishes successfully and remains naturalized over the long term. Restoration works occurring below the top of bank within a SPEA should still interface with the WSA, following the proposed requirements for stream restoration and enhancement by qualified proponents.

**Question:** Do you agree with the concept of allowing some types of development or improvements within stream protection enhancement areas (such as removing dangerous trees, removing invasive species, small-scale access routes, or allowing homeowners to rebuild what was lost after wildfires or other natural disasters)?

**Response:** Yes

**Question:** If you answered yes to the question above, what types of development or improvements do you think should be allowed within stream protection enhancement area (SPEAs)?

Response Hazard/Danger Tree Management – with the support of ISA Certified Arborist/TRAQ; approach should look at wildlife trees where possible, full removal to protect life and property if alternative management approach is not feasible. Upland invasive species management within riparian areas, similar to exemptions for aquatic invasive species under Part 3 of the WSR. Non-permanent small scale access routes – soft trails for property access that can be naturally reclaimed if left abandoned. Non-permanent natural material fencing, constructed from wood or other degradable natural materials that allow wildlife movement, no metal, plastic or concrete fences.

**Question: What risks do you see with allowing minor development within stream protection enhancement area (SPEAs)?**

Response: Exemptions for repairing/rebuilding structures could allow footprint expansion without senior government oversight, placing compliance responsibility on local staff who may lack expertise. If a structure becomes unlivable, it is preferable to relocate it outside the SPEA and restore the area. Rebuilding in SPEAs after natural disasters carries similar risks; new structures in the same locations may face repeated hazards. Relocation outside the SPEA reduces exposure to floods or landslides.

Exemptions for previously approved major projects remove regulatory checkpoints, potentially allowing construction to move forward without property oversight. Environmental Assessments do not replace detailed construction-level permitting. Exemptions for contaminated site remediation risk unregulated ecological impacts. EMA remediation focuses on groundwater and soil standards, not ecological restoration. SPEA restoration should be ensured through RAPA/RAPR/RARNS oversight.

**Question: Please use this space to provide any additional comments, feedback, questions or concerns on the changes being explored to RAPR.**

Response: Local/regional governments must ensure their zoning, development, and building regulations support RAPA/RAPR compliance. Changes to RAPR should involve meaningful engagement with local government staff to assess administrative feasibility and ensure consistent implementation. This survey alone does not constitute adequate engagement for changes that could significantly impact implementation. Additional engagement opportunities for local governments should be provided.

### List of Natural Resource Permitting Improvement Topics

<b>Permitting Improvement Topics</b>	<b>Intended Regulatory Review</b>
Exemption for construction dewatering	Exploring options to reduce authorization requirements for construction projects encountering groundwater.
Low volume water use without an authorization	Considering updates to allow small groundwater withdrawals without requiring a provincial authorization.
Exemption for constructing ice roads to access restoration sites	Not applicable.
Administrative penalties timelines	Exploring ways to align <i>Water Sustainability Act</i> administrative penalty timelines and processes with other natural resource statutes.
Expanding eligibility for stream restoration activities	Considering opportunities for qualified proponents to carry out stream channel and fish habitat restoration and maintenance projects.
Riparian Areas Protection Regulation enhancements	Exploring expanded exemptions for low-risk activities, introducing flexibility for recovery efforts, and clarifying missing or ambiguous definitions.
Low volume water use streamline authorization process	Developing a new review process for small withdrawals from streams or aquifers where impacts on other users, land, or the environment are minimal.
Expediting existing use groundwater applications	Exploring streamlining the review and decision process for existing-use groundwater applications.
Best management practices for changes in and about a stream	Updating guidance to address gaps in current application processes.
Streamlining routine permitting for changes in and about a stream	Exploring a single application process covering project design, best management practices, mitigation, and monitoring for multiple or recurring works.
Managing all wetland classes	Considering including all wetland types, including bogs and shallow open waters, under the WSA for consistent stewardship.
Applying the mitigation hierarchy for wetland activities	Exploring improved application of the "avoid, minimize, restore-on-site, offset" hierarchy for wetland-impacting activities.
Strategic use of offset payments to support wetland conservation	Considering using compensation measures and offset payments to support wetland restoration and conservation efforts.
Wetland identification and delineation manual	Developing a science-based manual for identifying wetlands and determining their boundaries.
Wetland professional accountability	Exploring definitions of qualified professionals and assurance statement requirements for work in and around wetlands.
Streamlining Forest Act permitting in Ministry of Transportation and Transit Right of Ways	Exploring more efficient permitting for linear utility projects (pipelines, transmission lines) crossing Crown land and provincial highway lands managed by the BC Transportation Financing Authority.

### Potential Benefits and Challenges of the Proposed Permitting Improvements

Municipal Service Area	Potential Benefits	Potential Challenges
<b>Flood Protection and Diking Projects</b>	<p>Streamlined approvals for routine or recurring dike maintenance and drainage works could reduce delays for time-sensitive projects.</p> <p>Potential to consolidate multiple permits (e.g., pump stations, culverts, dike tie-ins) under one WSA authorization, improving coordination.</p> <p>Faster response to emergency works during high-water events if exemption thresholds are clarified.</p>	<p>Reduced provincial oversight or broader exemptions could increase environmental risk if not well-defined.</p> <p>Potential changes to requirements for regulated streams and wetlands may increase permitting load for capital works.</p> <p>Ambiguity about what qualifies as 'routine' may delay projects until clarified.</p> <p>Greater administrative responsibility for municipalities to ensure compliance if provincial review is reduced.</p>
<b>Road and Utility Infrastructure Projects and Maintenance</b>	<p>Modernized permitting could reduce redundancy between provincial and municipal review for watercourse crossings, culverts, and outfalls.</p> <p>Predictable, standardized review pathways may better align with the delivery of capital projects under the City's Integrated Rainwater Resource Management Strategy.</p>	<p>If changes shift more responsibility to Qualified Professionals or local governments, the City may need to increase internal technical oversight capacity, including additional staff resources.</p> <p>Risk of inconsistent interpretation between City and provincial regulators during transition to new permitting processes.</p>
<b>Riparian Management Areas and Natural Areas</b>	<p>Updated standards could clarify assessment expectations and improve consistency.</p> <p>May provide opportunities for integrating ecological restoration into development projects more flexibly.</p> <p>Stronger Qualified Professional accountability could improve report quality and project outcomes.</p> <p>A clearer and more standardized definition of 'wetland' could improve consistency across jurisdictions, reduce interpretation disputes, and support more predictable decision-making.</p> <p>Stronger provincial guidance could help municipalities integrate wetland protection into land use planning and capital project design more effectively.</p> <p>Potential opportunities for wetland offset or compensation frameworks could complement the City's habitat restoration and enhancement initiatives.</p>	<p>Revisions could require amendments to City Bylaws and internal review procedures.</p> <p>If provincial standards are relaxed, local riparian and habitat protection objectives under the ENMS may be harder to achieve.</p> <p>Potential increase in staff workload to interpret and apply new or transitional RAPR standards.</p> <p>Changes to the definition of 'wetland' to include bogs may alter how areas are classified, potentially adding or removing sites from regulation, which could affect development review processes.</p> <p>Changes to wetland classifications have the potential to increase permitting requirements for private development and public works.</p> <p>If provincial definitions differ from current municipal interpretations, the City may need to update internal GIS datasets, policies, and bylaws to maintain consistency.</p>
<b>Development Review and Permitting</b>	<p>Streamlined provincial systems could improve processing time for private projects needing both City and provincial approvals.</p>	<p>Early implementation phases could increase confusion or duplicative reviews until systems stabilize.</p> <p>If the Province limits engagement windows, municipal feedback opportunities may be reduced.</p> <p>Transitioning to new forms, workflows, or data systems will require staff training, process adjustments, or additional staff resources.</p>



# City of Richmond

## Report to Committee

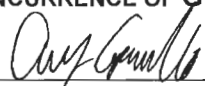

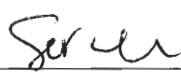
**To:** General Purposes Committee **Date:** November 10, 2025  
**From:** Mark Corrado **File:** 12-8275-20-AMANDA  
Director, Comm Bylaws and Licencing #/2014-Vol 01  
**Re:** **Application To Amend Food Primary Liquor Licence # 311573 - Change to  
Hours of Liquor Service – Yokai Tapas & Sake Bar – 140 – 6386 No 3 Rd**

### Staff Recommendations

1. That the application from Imagin Restaurants Concepts Ltd., doing business as Yokai Tapas & Sake Bar, for an amendment to Food Primary Licence #311573, requesting an increase to their hours of liquor service from 09:00am to Midnight Monday to Sunday, to 09:00am to 2:00am Monday to Sunday, be supported; and
2. That a letter be sent to the Liquor and Cannabis Regulation Branch, which includes the information as set out in Attachment 1 to this report, advising that Council recommends the approval of the amendment to the Food Primary Liquor Licence as described in the Recommendation 1 of this report.

  
Mark Corrado  
Director, Community Bylaws and Licencing  
(604-204-8673)

Att. 4

REPORT CONCURRENCE		
<b>ROUTED TO:</b>	<b>CONCURRENCE</b>	<b>CONCURRENCE OF GENERAL MANAGER</b>
Fire Rescue	<input checked="" type="checkbox"/>	
RCMP	<input checked="" type="checkbox"/>	
Building Approvals	<input checked="" type="checkbox"/>	
<b>SENIOR STAFF REPORT REVIEW</b>	<b>INITIALS:</b> 	<b>APPROVED BY CAO</b> 

## Staff Report

### Origin

The Provincial Liquor and Cannabis Regulation Branch (LCRB) issues licenses in accordance with the *Liquor Control and Licensing Act* (Act) and the Regulations made pursuant to the Act.

This report deals with an application to the LCRB and the City of Richmond by Imagin Restaurants Concepts Ltd., doing business as and hereinafter referred to as Yokai Tapas & Sake Bar, for an amendment to the Food Primary Liquor Licence #311573, proposing an increase to liquor service hours from current hours of 9:00AM to Midnight, Sunday to Saturday, to proposed hours of 9:00AM to 2:00AM Sunday to Saturday. There is no increase proposed to the total person capacity, which will remain the same at 30 Persons.

The City of Richmond is given the opportunity to provide written comments by way of a resolution to the LCRB with respect to the liquor licence amendment application for an amendment to the Food Primary Liquor Licence. The process requires the local government to provide comments with respect to the following criteria:

- The potential for noise;
- The impact on the community; and
- Whether the amendment may result in the establishment being operated in a manner that is contrary to its primary purpose.

This report supports Council's Strategic Plan 2022-2026 Strategy #2 Strategic and Sustainable Community Growth:

*Work collaboratively and proactively to attract and retain businesses to support a diversified economic base.*

### Analysis

Yokai Tapas & Sake Bar is situated at 6386 No 3 Road Unit 140, the location map is appended as Attachment 2. The property is zoned High Density Mixed Use and ECD Hub (ZMU37) – Brighthouse Village (City Centre). This zone provides for a broad range of commercial, office, service, institutional, entertainment and residential uses typical of the City Centre. There are a number of permitted uses in this property such as service, personal; office; retail, general; and restaurant. The company, which is owned and operated by Ms. Liang Chun (Leanne) Liu and Zhen Xu (Elvis) Dong, commenced business in 2023 and there has been no noted issues with the operation of this business since its inception.

The applicant's request for an increase in later service hours is to better serve their clients and the community. Yokai Tapas & Sake Bar currently operates until Midnight each day. Yokai Tapas & Sake Bar believes it can expand its customer base by offering service to those who arrive later on weekends. However, Yokai Tapas & Sake Bar does not expect to stay open each night, anticipating weekends mainly but wish to have the option available depending on demand. Appended as Attachment 3 is the applicant's Letter of Intent.

Impact of Noise on the Community

The existing establishment has had no prior noise complaints since it opened in 2023. Moreover, it will continue to operate as a food primary establishment (restaurant) and not a liquor primary (bar).

Impact on the Community

The community consultation process for reviewing applications for liquor-related licences is prescribed by the Development Application Fees Bylaw No. 8951 which under Section 1.8.1 calls for:

- 1.8.1 Every **applicant** seeking approval from the **City** in connection with:
  - (a) a licence to serve liquor under the *Liquor Control and Licensing Act and Regulations*;  
must proceed in accordance with subsection 1.8.2.
- 1.8.2 Pursuant to an application under subsection 1.8.1, every **applicant** must:
  - (b) post and maintain on the subject property a clearly visible sign which indicates:
    - (i) type of licence or amendment application;
    - (ii) proposed person capacity;
    - (iii) type of entertainment (if application is for patron participation entertainment); and
    - (iv) proposed hours of liquor service; and
  - (c) publish a notice in at least three consecutive editions of a newspaper that is distributed at least weekly in the area affected by the application, providing the same information required in subsection 1.8.2(b) above.

The required signage as well as newspapers advertisement were posted from August 16 to August 20, 2025.

Staff also conducted a neighborhood survey, which included over 600 letters beings sent to surrounding property owners, residents and businesses. The survey letter provided information on the proposed liquor licence amendment application and contained instructions to comment on the application. The period for commenting for all public notifications ended September 14, 2025.

As a result of the community consultation process described, the City has received two responses opposed to this liquor application. The complaints raised concerns regarding potential increased in noise, public safety risks and overall quality of life issues.

Should the concerns raised in the letters materialize both staff and the Liquor Cannabis Regulation Branch could take enforcement action which ranges from fines to the removal of the business licence via Council Hearing or removal of the Liquor Licence via the LCRB. To date no such issues have arisen and no record of any past violations have been received by the City or The public responses appended as Attachment 4.

### Other Agency Comments

As part of the review process, staff requested comments from other departments and agencies such as Building Approvals Department, Richmond Fire-Rescue (RFR), Richmond RCMP, and Vancouver Coastal Health (VCH). These agencies and departments provide comments on the compliance history of the applicant's operations and premises.

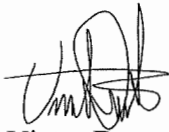
RCMP, Building Approvals Department, RFR and VCH found no concerns.

### **Financial Impact**

None.

### **Conclusion**

The results of the community consultation process for Yokai Tapas & Sake Bar application for extended service hours was reviewed based on the LCRB criteria. The analysis concluded there should be no noticeable potential impact from noise, no significant impact to the community and no comments or ongoing concerns were raised from the regulatory agencies. Based on the culmination of these factors, staff recommend that the application to amend the Food Primary Liquor Licence with no change to person capacity be supported.



Victor Duarte  
Program Manager, Business Licences  
(604-276-4389)

VMD:vmd

- Att. 1: Particulars of Application and City Comments  
2: Aerial Map with 50 Metre Buffer Area  
3: Letter of Intent  
4: Opposed Responses



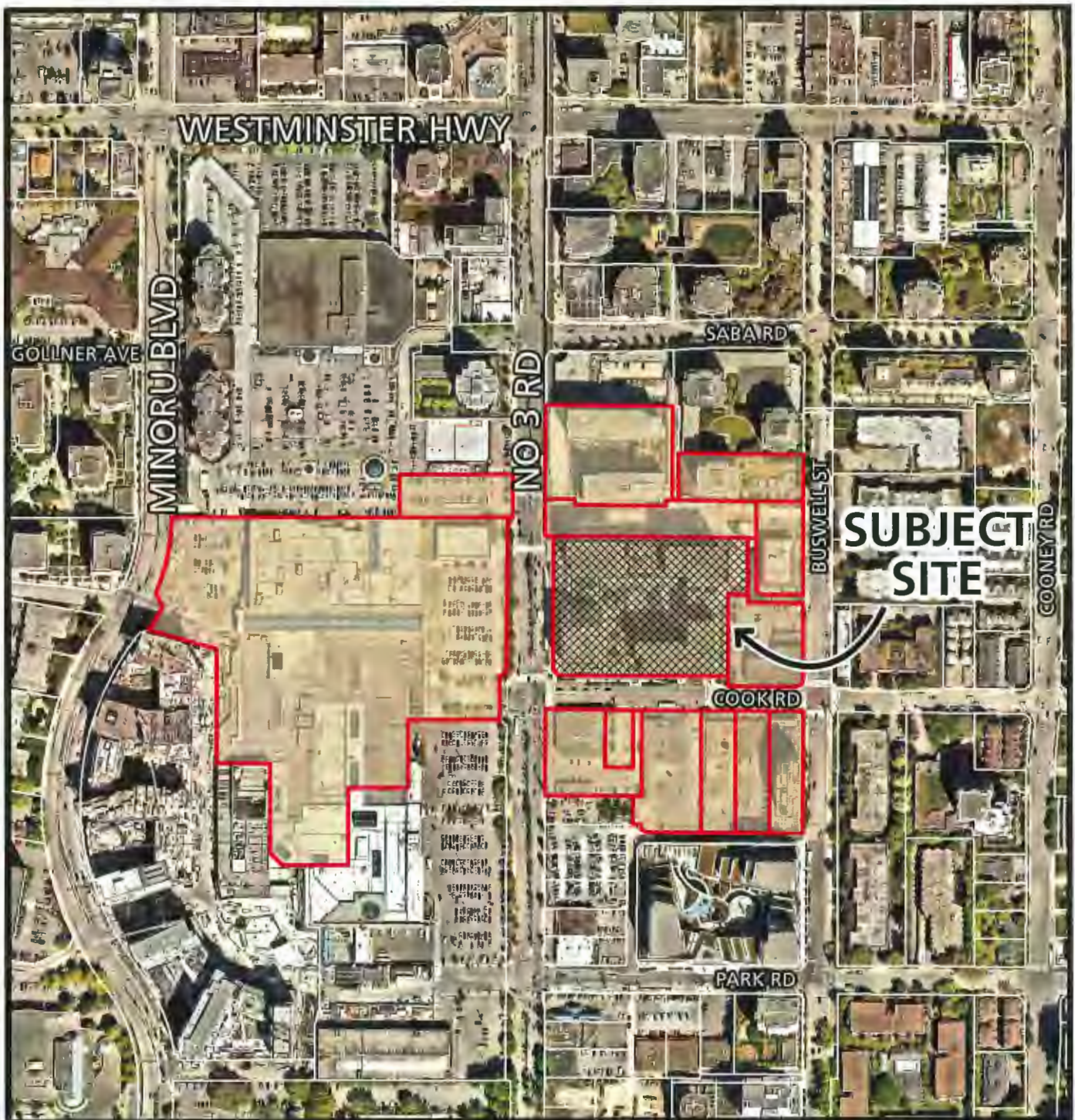
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**Re: Application to Amend Food Primary Liquor Licence # 311573 – Change to Hours of Liquor Service – Yokai Tapas & Sake Bar – 140 – 6386 No. 3 Rd., Richmond B.C.**

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1. That the application from Imagin Restaurants Concepts Ltd., doing business as: Yokai Tapas & Sake Bar, operating at, 140 – 6386 No. 3 Rd., requesting an increase to hours of liquor service to the Food Primary Liquor Licence # 311573, be supported for:
  - a) A permanent change to hours of liquor service;
    - i) **From**, Monday to Sunday, 9:00 AM to Midnight;
    - ii) **To**, Monday to Sunday, 9:00 AM to 2:00 AM;
  - b) Total person capacity will remain the same at 30 persons;
2. That a letter be sent to Liquor and Cannabis Regulation Branch advising that Council supports the amendment for a permanent change to hours of liquor service to the Food Primary Liquor Licence # 311573, with the hours as listed above, and;
3. Council's comments on the prescribed criteria (Section 71 of the Liquor Control and Licencing Regulations) are as follows:
  - a) The impact of additional noise and traffic, in the area of the establishment, was considered;
  - b) The potential impact on the community was assessed through a community consultation process; and
  - c) Given that there has been no noted issues with this operation since its inception in 2023, the amendment to change hours of liquor service to the Food Primary Liquor Licence should not change the establishment such that it is operated contrary to its primary purpose;
  - d) As the operation of a licenced establishment may affect nearby residents, businesses and property owners, the City gathered the views of the community through a community consultation process as follows:
    - i) Residents, businesses and property owners within the surrounding area of the establishment were notified by letter. The letter provided information on the application with instructions on how to submit comments or concerns; and
    - ii) Signage was posted at the subject property and three public notices were published in a local newspaper. The signage and public notice provided information on the application with instructions on how to submit comments and concerns.

- ii) The community consultation process generated only two comments opposed to this application.
- iii) Council recommends the approval of the amendment to the Food Primary Liquor Licence with extended hours of liquor service to 9:00 AM to 2 AM, Sunday to Saturday, for reasons that the addition of the extended hours proposed is acceptable to the majority of the residents, businesses and property owners in the area and the community.



#140 - 6386 No 3 Rd  
50 Metre Map

Original Date: 10/28/25  
Revision Date:

Note: Dimensions are in METRES



To Whom It May Concern,

I am writing on behalf of Yokai Tapas Bar to formally request an extension of our liquor service hours.

In recent months, our business has been experiencing a noticeable slowdown, particularly on weekdays when customer traffic is minimal. On weekends—especially during the summer—many of our guests tend to arrive later in the evening, and it is common for them to stay until midnight. Unfortunately, due to our current licensed hours, we are often required to ask them to leave, which negatively impacts the customer experience and has contributed to a decline in return visits.

With extended liquor service hours, we hope to create a more flexible and welcoming atmosphere for our guests. This change would allow us to better accommodate late-night diners and provide them with a more enjoyable experience. It would also help us cover a portion of our staffing costs, as weekday revenues continue to struggle. Please note, we do not intend to stay open late every night, but rather wish to have the option available depending on demand.

We are committed to operating responsibly and in full compliance with all applicable regulations. We truly appreciate your consideration of this request and thank you for your time and support.

Sincerely,

Yokai Tapas Bar

August 27, 2025

From: [REDACTED]

[REDACTED] 8133 Cook Road,

Richmond BC

V6Y 0L7

Tel: [REDACTED]

Attn: Victor Duarte

In response to your notice regarding the change in hours to Liquor Licence in my neighbourhood by the application from Imagin Restaurants Concepts Ltd., doing business as : Yokai Tapas & Bar attempts to increase the service hours of liquor service from Midnight to 2:00 AM, I am hereby writing to object this amendment.

Even now I would still be disturbed by the consumers there at midnight due to their noises by speaking, chatting and screaming loudly occasionally. I can imagine the sleeping quality of our neighbourhood include my family will be getting worse if the service hours has been extended.

Thank you for your attention to this matter.

Best regards,

[REDACTED]  


**Duarte, Victor**

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**Subject:** FW: Opposition to Liquor Licence Amendment Application (Yokai Tapas & Bar)

**From:** [REDACTED] >  
**Sent:** August 19, 2025 12:27 PM  
**To:** BusLic <BusLic@richmond.ca>  
**Subject:** Opposition to Liquor Licence Amendment Application (Yokai Tapas & Bar)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**City of Richmond Security Warning:** This email was sent from an external source outside the City. Please do not click or open attachments unless you recognize the source of this email and the content is safe..

Dear Mr. Duarte,

I am writing in response to the City's notice dated August 11, 2025, regarding the application by Imagin Restaurants Concepts Ltd. (Yokai Tapas & Bar) for a change in hours of liquor service. I wish to formally express my strong opposition to this application.

First, I must point out that the address stated in the City's notice is incorrect. The letter identifies the premises as being located at *140 – 6386 No. 3 Road*. In fact, as confirmed by the business's own listings and signage, the establishment is located at *Unit 140, 8133 Cook Road, Richmond, BC V6Y 0L7*—directly beneath our residential building. This error in the public notice is significant because it downplays the direct and immediate impact this business has on residents living above the premises.

Second, extending liquor service hours from midnight to 2:00 AM will have serious negative impacts on the community, especially the residents living directly above and adjacent to the bar. These impacts include:

- **Noise and disturbance:** Late-night operations will inevitably increase noise, music, and crowd activity well past midnight, disturbing families, seniors, and children who live in the building.

- **Public safety concerns:** Extended hours will attract loitering, intoxicated behavior, and potential conflicts in and around the residential entrance areas, putting residents at risk.

- **Quality of life:** Residents' ability to enjoy peace, rest, and security in their own homes will be seriously compromised. This building was never intended to coexist with a late-night drinking establishment directly below.

- **Community well-being:** Approving such an amendment would set a harmful precedent, prioritizing business profits over residents' rights to a safe and quiet home environment.

Our residential building was not designed to coexist with extended late-night liquor service directly underneath. Allowing such an amendment would unreasonably compromise the peaceful enjoyment of our homes and contradict the intent of maintaining balanced community standards between businesses and residents.

**For these reasons, I respectfully request that the City of Richmond deny the proposed amendment to extend liquor service hours for Yokai Tapas & Bar.**

**Thank you for your attention and for considering the concerns of local residents.**

**Sincerely,**

**[REDACTED]**

**[REDACTED], 8133 Cook Road  
Richmond, BC V6Y 0L7**

**Tel: [REDACTED]**

**Prefer way for contact via email: [REDACTED]**