



June 23, 2025

Richmond Hill City Council
225 East Beaver Creek Road
Richmond Hill, ON L4B 3P4

Dear Richmond Hill Council,

We are writing in respect of the proposed designation of Elgin Mills Cemetery, owned and operated by Mount Pleasant Group (MPG), as a heritage property by the City of Richmond Hill. By this correspondence, we seek to draw Council's attention to the proposed designation of a grove of black walnut trees as having 'associative value' in relation to a farmhouse structure which, as we understand, is the principal subject of heritage designation. Mount Pleasant Group believes the proposed designation of these trees would be duplicative of the city's existing protections for such trees and that this further designation would only serve to introduce an unnecessary and potentially redundant process.

By way of background, MPG opened Elgin Mills Cemetery in 1979 when we were approached by the City of Richmond Hill to provide a burial space to accommodate the city's growing population. The property is located at the corner of Elgin Mills and Leslie occupying 172 acres. It is a full service facility – from there we operate a cemetery, funeral centre and crematorium. We serve a variety of faiths and cultures that represent the diversity that is Richmond Hill. As a non-denominational organization, we are proud to serve a diverse and multicultural community including the Greek Orthodox, Macedonian, Coptic, Muslim, B'Hai and Chinese communities, as well as the rest of the Richmond Hill population. It is also one of our busiest sites. Last year, we performed 1500 burials, 600 cremations and 1000 funerals. I raise this operating context to draw your attention to the fact that MPG is a responsible corporate citizen with deep roots in the Richmond Hill community. Our long and storied past brings with it a deep sense of responsibility. We believe that these responsibilities extend well into the future, and in many cases in perpetuity under provincial statute.

As mentioned, Elgin Mills was opened in 1979 and we are quickly approaching capacity at Elgin Mills. Currently surveyed inventory is anticipated to be depleted in the next few years. Once fully depleted, residents will need to travel further afield to be buried and to visit their loved ones. At Mount Pleasant Group, we firmly believe that cemeteries are required to form complete communities.

Locations:

Beechwood
Cemetery
Vaughan

Duffin Meadows
Cemetery
Pickering

Elgin Mills
Cemetery, Cremation
and Funeral Centres
Richmond Hill

Meadowvale
Cemetery, Cremation
and Funeral Centres
Brampton

Mount Pleasant
Cemetery, Cremation
and Funeral Centres
Toronto

Pine Hills
Cemetery and
Funeral Centre
Scarborough

Prospect
Cemetery
Toronto

The Simple Alternative
Mississauga

The Simple Alternative
Pickering

The Simple Alternative
Toronto

Thornton
Cemetery, Cremation
and Funeral Centres
Oshawa

Toronto Necropolis
Cemetery
Toronto

York
Cemetery and
Funeral Centre
North York

We are continuously seeking out ways to continue serving families looking to MPGC in their time of need by developing unused lands and building new types of structures for burial, such as columbarium or mausoleums, but the reality is that we are anticipating to run out of cemetery space for in-ground casket burials within a generation. This context is highly relevant because given interment rights in Ontario are sold in perpetuity under Provincial law cemetery land is not a renewable resource and so while we certainly appreciate the need to honour and preserve tradition, we believe the cemetery ought to be put to its highest and best purpose, which is as a burial ground.

We understand that City staff are proposing to designate the grove of four (4) black walnut trees southeast of the structure as having 'contextual value' in relation to the farmhouse itself, which has 'physical', 'design' and 'historical' value. It is our earnest desire to work collaboratively with the City, however, we are concerned that this proposed designation would prejudice our ability to serve Richmond Hill residents. At this time, we are not clear on whether such a proposed designation would extend to the ground space between the trees and structure, which is approximately seven (7) metres. This space represents potentially hundreds of interments (burials) for Richmond Hill families and would extend the working lifespan of the cemetery itself. We also note that the City already has an existing bylaw on its books to protect such trees, Bylaw 19- 25, which requires the landowner to obtain a permit before a tree can be 'injured' or removed. Designation of this grove of walnut trees would be duplicative of the city's existing process and administratively burdensome.

At MPG, we firmly believe it is our responsibility to protect urban and suburban landscapes. Amongst our various properties, we have over 16,000 free-standing trees under our care. To maintain that canopy, we have a dedicated arborist team that is led by a licensed arborist. Large green spaces such as MPG cemeteries serve as the 'lungs of a city'. Our trees clean pollutants in the air, reduce noise pollution, sequester atmospheric carbon dioxide, provide home for wildlife, and reduce stormwater runoff. We have no intention of reducing our arboretum and we take great pride in the tree canopy we provide to residents and communities. At the same time, we do believe it is our first and paramount duty to serve as a cemetery and, as such, as we are seeking to ensure that any proposed designation of our cemetery takes into account our principal operating purpose – to serve as a place of burial, grieving and memorialization for all.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Yoon', with a stylized flourish at the end.

Jamie Yoon
General Counsel
Director Government and Regulatory Affairs