



Thursday, 13th June, 2019

Honourable George Heyman
Minister of Environment and Climate Change Strategy
Parliament Buildings
Victoria, British Columbia V8V 1X4

Sent via email to: ENV.Minister@gov.bc.ca

RE: Workforce housing for Woodfibre LNG/ FortisBC Eagle Mt. pipeline projects

Dear Minister,

We would like to express our sincere concern that workforce housing solutions recently proposed to serve the Woodfibre LNG / FortisBC Eagle Mountain – Woodfibre Gas Pipeline projects have not been properly assessed as part of the environmental assessment (EA) process. These include:

- 1) The proposal by LandSea for a temporary work camp at Britannia Beach;¹
- 2) Workforce housing situated in the new Sirocco development in downtown Squamish, where Woodfibre LNG has rented an entire building to house its workers;²
- 3) A possible floating work camp situated near the Woodfibre LNG site.

In their EA applications, both Woodfibre LNG and FortisBC indicated that the majority of employees in the construction and operation phases would be sourced locally, and that workers are expected to reside in their own homes or use existing rental housing and temporary accommodation. Please see the excerpts from the EA applications below that are included for your convenience.

The proponents suggested that such local hiring practices would alleviate the potential impact on rental accommodation in the Squamish/Howe Sound area, which was recognized in both EA applications as a key concern for the communities in the local assessment area (LAA). Both proponents indicated that workforce housing or work camps would not be required. Consequently, the environmental, social, health, heritage, and economic impacts of workforce housing and/or work camps to accommodate workers for both Woodfibre LNG and the FortisBC pipeline projects were never assessed.

The location of a work camp and/or workforce housing in the affected communities remains a major concern, and many residents continue to voice their objections to the proponents and local elected officials.^{2,3,4,5}

¹ SLRD Committee of the Whole Agenda (25th April 2019) Application for Temporary Use Permit Approval: Temporary Workforce Accommodation. Page 70 of 351. <https://slrd.civicweb.net/document/109450>

² Jennifer Thuncher (2019) Woodfibre LNG rents out Squamish building for future workers. Squamish Chief, 31st May 2019. <https://www.squamishchief.com/real-estate/woodfibre-lng-rents-out-squamish-building-for-future-workers-1.23841174>

³ Steven Chua (2019) Britannia temporary work camp again draws contentious debate. Squamish Chief, 4th June 2019. <https://www.squamishchief.com/news/local-news/britannia-temporary-work-camp-again-draws-contentious-debate-1.23844376>

⁴ Patricia Heintzman (2019) OPINION: Missing and murdered and Squamish. Squamish Chief, 12th June 2019. <https://www.squamishchief.com/opinion/columnists/opinion-missing-and-murdered-and-squamish-1.23853570>

⁵ District of Squamish (2019) Committee of the Whole meeting minutes June 11th 2019. <https://squamish.ca/yourgovernment/meetings/video-library/2019-meeting-video-archive/june/>



For example, the recent report from the National Inquiry into Missing and Murdered Indigenous Women and Girls highlights “substantial evidence of a serious problem that requires focused attention on the relationship between resource extraction projects and violence against Indigenous women.”⁶

Given these substantial changes to the temporary accommodation requirements for both projects, we request that the EA certificates for both projects be suspended until the proposed work camps / workforce housing solutions are submitted as amendments to the EA for both projects and duly considered by the BC EAO to determine potential environmental, social, health, heritage, and economic impacts.

We also suggest that the Squamish Nation may want to consider assessing the impacts of work camps and workforce housing through their separate environmental assessment process for the Woodfibre LNG and FortisBC pipeline projects, and in particular the proximity of the proposed LandSea work camp to the Stawamus 24 reserve.

Sincerely,

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Executive Director

My Sea to Sky

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Copied to:

Minister of Environment and Climate Change Catherine McKenna

MP Pamela Goldsmith-Jones

MLA Jordan Sturdy

SLRD board of directors

District of Squamish Mayor and council

Squamish Nation band council

BC EAO

⁶ National Inquiry into Missing and Murdered Indigenous Women and Girls (2019) Reclaiming Power and Place. Final Report. 728 pp.
<https://www.mmiwg-ffada.ca/final-report/>

Background information about the proposed LandSea work camp

In August 2017, the LandSea work camp was refused a Temporary Use Permit (TUP) by the Squamish Lillooet Regional District (SLRD), stating *“The board is not interested in a temporary use permit for a work camp on those lands separate and apart from an actual project,”* and that *“We’re focused on permanent and having well-planned communities and using land that’s designed to provide permanent affordable and market housing.”*⁷

SLRD policy 4.7 (Temporary Use Permits)⁸ dated 27th/28th June 2018 established policy guidance with regards to TUP applications, with specific considerations for work camps, including:

- *Servicing, environmental issues, neighbourhood impacts, and public safety issues will be considered as part of a TUP application.*
- *TUP applications for work camps should support specific, defined projects and should not be put forward solely as an affordable housing option.*

In LandSea’s recent TUP application, it states that *“The project is anticipated to have two major tenants; Woodfibre LNG Project construction workers and contractors and the FortisBC Eagle Mountain Pipeline Project construction workers and contractors.”*⁹

In the report prepared by Swift Creek Consulting on behalf of LandSea, titled *“Comparison of effects of workforce housing options in Squamish”* it states in Section 2 that:

*“Most workers would be associated with Woodfibre LNG, who has already secured a guarantee to 75% of the rooms, while the rest of the workers would be associated with various other construction projects in the Squamish area.”*¹⁰

At the 25th April 2019 SLRD Committee of the Whole meeting, the board passed a motion stating:

*“THAT, with respect to Temporary Use Permit #64 Work Camp - Britannia Beach South, issuance of a Temporary Use Permit be contingent on a finalized user agreement between LandSea and Woodfibre LNG and/or FortisBC that identifies the number of beds required, peak occupancies and maximum beds required where project schedules overlap.”*¹¹

This motion by the SLRD formally links the proposed LandSea work camp to the Woodfibre LNG / FortisBC Eagle Mountain – Woodfibre Gas Pipeline projects.

⁷ Steven Chua (2017) Britannia Beach work camp proposal turned down again. Squamish Chief, 3rd August 2017.

<https://www.squamishchief.com/news/local-news/britannia-beach-work-camp-proposal-turned-down-again-1.21565425>

⁸ SLRD (2018) Policy No. 4.7 (Temporary Use Permits)

<https://www.slrd.bc.ca/sites/default/files/pdfs/administration/Policies/4.7%20TUP%20Policy.pdf>

⁹ SLRD Committee of the Whole Agenda (25th April 2019) Application for Temporary Use Permit Approval: Temporary Workforce Accommodation. Page 70 of 351. <https://slrd.civicweb.net/document/109450>

¹⁰ SLRD Committee of the Whole Agenda (25th April 2019) Comparison of Effects of Workforce Housing Options in Squamish. Page 170 of 351. <https://slrd.civicweb.net/document/109450>

¹¹ SLRD Board Agenda (22nd May 2019) Draft SLRD Board Minutes April 24 & 25, 2019. Page 36 of 552.

<https://slrd.civicweb.net/document/110270>

Background information about proposed workforce housing in downtown Squamish

It has recently been announced that Woodfibre LNG has leased one of the three buildings in the new Sirocco development in its entirety, and that it will make the housing in that building available only to its site staff and their families.¹² While acknowledging the problem with low rental vacancy rates in Squamish, Woodfibre LNG justifies its removal of one-third of the new housing units from the rental market on the basis that it will not remove existing rental capacity from the market. By securing a monopoly on accommodation for its own employees in the new building, however, Woodfibre will make the rental housing market worse than it would have been otherwise.

Squamish has been experiencing a housing crisis for several years, and the Official Community Plan notes that in 2016 Squamish had the lowest apartment vacancy rate in the province.¹³ Transforming rental accommodation that would help to alleviate this housing crisis into workforce accommodation is a serious issue, and the impacts of locating Woodfibre LNG's workers in downtown Squamish in a single location have not been properly assessed.

Statements by Woodfibre LNG in their Application for an Environmental Assessment Certificate:

1. "For housing and accommodation, it is assumed that, where possible, the majority of any in-migrating workers in either the construction or operation project phases will live within the local area defined as Squamish, Whistler, SLRD Electoral Area D, and Metro Vancouver."

SOURCE: Woodfibre LNG (2015) Application for an Environmental Certificate: Executive Summary, page 51.
<https://projects.eao.gov.bc.ca/api/document/5886919de036fb0105768fe1/fetch>

2. "Based on Project labour requirements, mitigation measures and the resilience of the housing and accommodation subcomponent the residual effect on housing availability and affordability is expected to be negligible. Project-related effects are likely to be limited to the RAA (Regional Assessment Area), occur in the moderate-term and be reversible."

"Based on the Project activities and the interactions between Project-related activities and infrastructure and community services identified, it is likely that the Project will result in negligible adverse effects to the housing and accommodation subcomponent."

SOURCE: Woodfibre LNG (2015) Application for an Environmental Certificate: Executive Summary, page 52.
<https://projects.eao.gov.bc.ca/api/document/5886919de036fb0105768fe1/fetch>

3. "Worker accommodation – WLNG expects all workers to have or arrange their own accommodation and will not be providing temporary accommodation, such as an on-site camp. Woodfibre LNG Limited will provide living out allowances, as part of a compensation package, to non-local workers."

SOURCE: Woodfibre LNG (2015) Application for an Environmental Certificate: Section 6.2 Labour Market, page 6.2-29. <https://projects.eao.gov.bc.ca/api/document/5886918de036fb0105768fc2/fetch>

¹² Jennifer Thuncher (2019) Woodfibre LNG rents out Squamish building for future workers. Squamish Chief, 31st May 2019.
<https://www.squamishchief.com/real-estate/woodfibre-lng-rents-out-squamish-building-for-future-workers-1.23841174>

¹³ District of Squamish (2018) Squamish 2040: Official Community Plan Bylaw 2500,2017.
<https://squamish.civicweb.net/filepro/documents/157445>

4. “No Project provided Squamish area temporary accommodation is planned; construction workers are expected to reside in their own homes or use existing rental housing and temporary accommodation.
SOURCE: Woodfibre LNG (2015) Application for an Environmental Certificate: Section 6.3 Sustainable Economy, page 6.3-50. <https://projects.eao.gov.bc.ca/api/document/5886918ce036fb0105768fc1/fetch>
5. “There is expected to be a temporary population increase in the LAA, mainly in the Squamish area, during the construction phase as WLNG and WLNG’s engineering, procurement, and construction management (EPCM) contractor brings in non-local workers to fill the annual average of approximately 400 FTE jobs to supplement workers sourced from the LAA.”
SOURCE: Woodfibre LNG (2015) Application for an Environmental Certificate: Section 7.2 Infrastructure Community Services, page 7.2-42.
<https://projects.eao.gov.bc.ca/api/document/5886918ce036fb0105768fbe/fetch>
6. “It is anticipated the majority of construction jobs would be taken up by workers who have their primary residence in the LAA (Squamish, Whistler, and Greater Vancouver areas) and would commute daily via private vehicles to Squamish and by ferry from Darrell Bay to the project site. However, some construction workers with residences in Metro Vancouver may decide to relocate temporarily closer to the ferry in Squamish, using either rental housing accommodation or short-term arrangements, such as hotels and motels in the Squamish area.”
SOURCE: Woodfibre LNG (2015) Application for an Environmental Certificate: Section 7.2 Infrastructure Community Services, page 7.2-43.
<https://projects.eao.gov.bc.ca/api/document/5886918ce036fb0105768fbe/fetch>

Statements by BC EAO in their approval of Woodfibre LNG’s environmental assessment certificate

1. “Temporary or permanent worker accommodation is not being proposed; construction and operations personnel are expected to reside in their own homes or use existing rental housing and temporary accommodation. Additional details related to potential effects on housing and accommodations are provided in section 7.1 (Infrastructure and Community Services) of this Report.”
SOURCE: Environmental Assessment Office (2015) Woodfibre LNG Project: Assessment Report, page 24.
<https://projects.eao.gov.bc.ca/api/document/58869291e036fb01057690bc/fetch>
2. “In addition to coordinating construction activities to minimize the overlap, the Proponent has proposed to provide information packages to prospective workers, and to hire a local housing and accommodation advisor to assist with finding suitable housing and accommodation options. The Proponent has committed to work with FortisBC and the DOS to minimize potential cumulative socio- economic effects from the construction workforce through the development of a community services and infrastructure management plan.”
“EAO proposes a condition that would require the Proponent to develop and implement a plan to adaptively manage potential socio-economic effects on services and infrastructure delivered by provincial agencies and

local governments. The plan would outline an approach for monitoring and reporting on the effectiveness of the mitigation measures set out in the plan.”

“Considering the above analysis and having regard to the conditions identified in the TOC and CPD (which would become legally binding as a condition of the EA Certificate), EAO is satisfied that the adverse residual effects of the proposed Project on the labour market and sustainable economy would be negligible.”

SOURCE: Environmental Assessment Office (2015) Woodfibre LNG Project: Assessment Report, page 130.
<https://projects.eao.gov.bc.ca/api/document/58869291e036fb01057690bc/fetch>

3. “Housing and Accommodation”

“The Application indicated that the supply of affordable and accessible housing continues to be a key concern for the communities in the LAA. The Application also indicated that rental accommodation is limited and in high demand in Whistler and Squamish, resulting in high rental costs. In Whistler and the SLRD Electoral Area D, the majority of residences are seasonal vacation homes. In Squamish, more than 90 % of the housing is occupied by permanent residents. Squamish has become a bedroom community of Whistler and Metro Vancouver. Squamish also has a number of housing developments that are either proposed or currently under development. The Application noted that in April 2014, the overall vacancy rate for private townhouses and apartment buildings in Squamish was only 0.3 %. Whistler has the largest number of temporary accommodations (e.g. hotels and motels) in the LAA at approximately 100 facilities. Squamish has approximately 20 temporary accommodation facilities, while the SLRD Area D has two.”

“The Application stated that during construction, workers sourced from outside of the LAA (approximately 40 % of the required labour force) would require temporary accommodation within the LAA.”

“The proposed Project would not include provisions for temporary accommodation such as construction work camps for non-local construction workers. Instead, the Proponent expects that workers would rely on available rental housing and temporary accommodation in Metro Vancouver, Whistler and Squamish. This could increase the demand for rental housing and temporary accommodation, further increasing pressures on housing availability and costs in these areas.”

“The temporary increase in population during the initial two years of operations would amount to approximately 130 persons, the majority of whom would be permanent residents of the LAA. A smaller portion of these workers would be temporary residents for approximately two years, responsible for training resident local staff.”

“Key proposed measures to mitigate the potential adverse effects to housing and accommodation include:

- A local hiring strategy to minimize the number of non-local workers requiring temporary housing and accommodation; and
- A housing and accommodation advisor during construction and the initial operations stage to serve as a resource for non-local workers seeking accommodation in the LAA.”

SOURCE: Environmental Assessment Office (2015) Woodfibre LNG Project: Assessment Report, page 132.
<https://projects.eao.gov.bc.ca/api/document/58869291e036fb01057690bc/fetch>

4. “After considering all factors above, EAO concludes that the proposed Project would not likely result in significant adverse effects to infrastructure and community services.”

SOURCE: Environmental Assessment Office (2015) Woodfibre LNG Project: Assessment Report, page 137.
<https://projects.eao.gov.bc.ca/api/document/58869291e036fb01057690bc/fetch>

Statements by FortisBC in their Application for an Environmental Assessment Certificate:

1. “Removal of “temporary construction camps.” This change was made as a clarification, this project is not proposing “temporary construction camps.”

SOURCE: FortisBC- Revised AIR, Nov. 10, 2014. Table 0.1 – Summary of key document changes since February 13, 2014 version.

2. “The proposed pipeline will be buried, except where aerial crossings may be used. The proposed Project will require access roads and temporary workspace; however, no worker construction camps are anticipated...”

SOURCE: FortisBC Energy Inc (2015) Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Executive Summary, page lxvi.
<https://projects.eao.gov.bc.ca/api/document/58869105e036fb0105768e5e/fetch>

3. “During construction, it is expected that the temporary workers will need to be housed in rental housing and temporary (commercial) accommodation. This in turn could lead to a reduced availability of short-term accommodation.”

SOURCE: FortisBC Energy Inc (2015) Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Section 12.0: Community and Regional Infrastructure and Services Effects Assessment, page 12-38.
<https://projects.eao.gov.bc.ca/api/document/58869101e036fb0105768e52/fetch>

4. “There will be short-term increased demand for accommodation including hotels, motels, rental suites and campgrounds in the RMOW and the District of Squamish where temporary construction workers will stay during the construction phase. Increased demand for accommodation could lead to upward pressure on the price of rental and temporary accommodation.”

“The District of Squamish currently has a low rental vacancy rate. The District of Squamish generally offers lower housing prices than its RMOW and City of Vancouver neighbours, which has attracted young families to this district in the past few years (Carrington, Stoyko pers. comm.). However, the Sea to Sky Community Services Society noted that prior to the 2010 Olympics, housing rates increased greatly and displaced lower-income families.”

SOURCE: FortisBC Energy Inc (2015) Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Section 12.0: Community and Regional Infrastructure and Services Effects Assessment, page 12-39.
<https://projects.eao.gov.bc.ca/api/document/58869101e036fb0105768e52/fetch>

5. “...the proposed Project is expecting to house workers in local accommodation in the District of Squamish and the RMOW.”

SOURCE: FortisBC Energy Inc (2015) Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Section 12.0: Community and Regional Infrastructure and Services Effects Assessment, page 12-63.

<https://projects.eao.gov.bc.ca/api/document/58869101e036fb0105768e52/fetch>

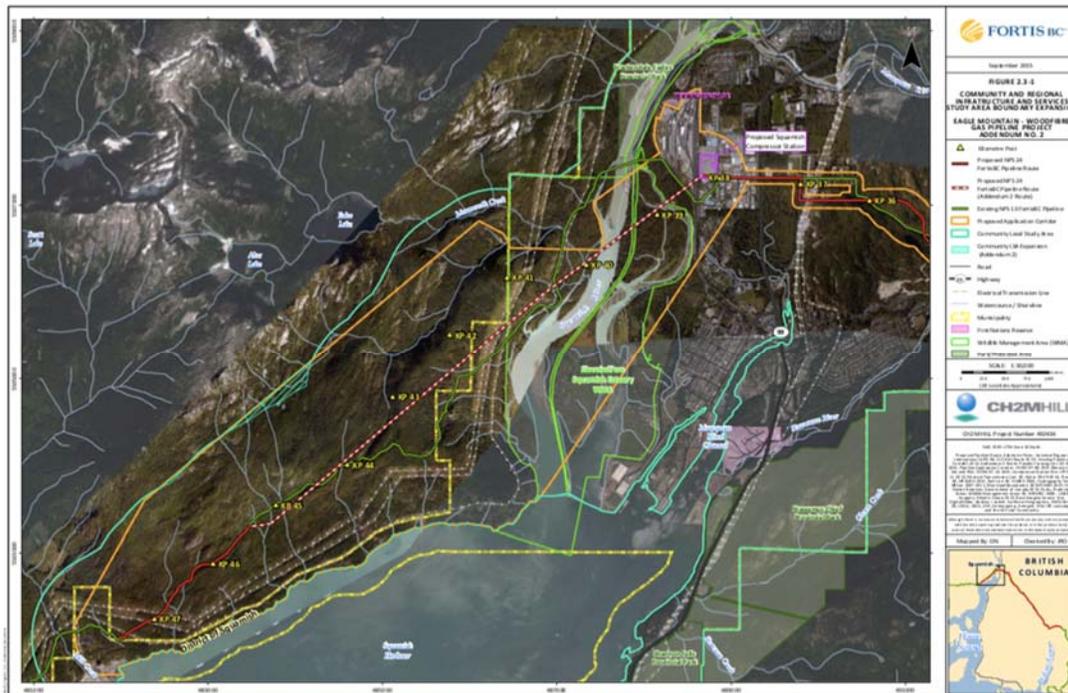
6. “The work camp to support Project construction on the west side of the Squamish River would not change existing economic conditions or adversely affect the Economy VC. Camp accommodation would be provided by a contractor, and could generate positive indirect effects such as increased opportunities for procurement (i.e., camp services or supplies).”

SOURCE: FortisBC Energy Inc (2015) Addendum to the Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Addendum 2, page 34.

<https://projects.eao.gov.bc.ca/api/document/58869118e036fb0105768eb8/fetch>

7. “There is no change in existing conditions for the Land and Resources Use VC. The camp would be located inside the Land and Resources LSA assessed in Section 13.0 of the Application (Figure 2.3-1).”

NOTE: The area of the map below does not include any of Britannia Beach.



SOURCE: FortisBC Energy Inc (2015) Addendum to the Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Addendum 2, page 39-40.

<https://projects.eao.gov.bc.ca/api/document/58869118e036fb0105768eb8/fetch>

8. “2.3.1.2 Community Utilities and Services Effects Assessment”

“If FortisBC chooses to proceed with the construction camp to accommodate up to 250 workers, there may be less workers seeking short-term accommodation in the District of Squamish and other communities in the Community and Regional Infrastructure and Services Study Area during the construction phase. However, as noted in Section 12.5.2.2 of the Application (Volume 1, Part B), the availability of rental accommodation in

Squamish is very low and temporary accommodation is also limited. Workers employed in construction of the pipeline on the east side of the Squamish River and the compressor station will likely seek accommodation in the Squamish area. Therefore, the characterization of the potential effects for ‘increased demand for short-term accommodation’ and ‘upward pressure on housing costs in select communities’ described in Table 12.5-2 of the Application do not change, and the significance conclusions remain the same.”

“The construction camp would not be expected to adversely affect other key indicators for the Community Utilities and Services VC. As noted in section 1.1.2, the use of potable water and wastewater would follow all applicable regulations, and would be transported to and from the site matching the material barge schedule if facilities cannot be used at the site. On-site medics would be used and no adverse effect would be expected for emergency and health care services.”

SOURCE: FortisBC Energy Inc (2015) Addendum to the Application for an Environmental Assessment Certificate for the proposed Eagle Mountain – Woodfibre Gas Pipeline Project: Addendum 2, page 37.
<https://projects.eao.gov.bc.ca/api/document/58869118e036fb0105768eb8/fetch>

Statements by BC EAO in their approval of FortisBC’s environmental assessment certificate

1. “EAO assessed the potential social and economic effects of the Eagle Mountain Project in sections 6 and 7 of the technical report, respectively. EAO is satisfied that the potential residual effects of the Eagle Mountain Project on the labour market and sustainable economy would be negligible and that there would not be significant adverse effects to the community, community utilities and services, or the economy.”

SOURCE: Environmental Assessment Office (2016) Eagle Mountain – Woodfibre Gas Pipeline Project: Assessment Report, page 17.

<https://projects.eao.gov.bc.ca/api/document/58869120e036fb0105768edb/fetch>

2. “A potential temporary worker camp west of the Squamish River to reduce marine traffic and worker accommodation requirements in Squamish.”

SOURCE: Environmental Assessment Office (2016) Eagle Mountain – Woodfibre Gas Pipeline Project: Assessment Report, page 2.

<https://projects.eao.gov.bc.ca/api/document/58869120e036fb0105768edb/fetch>

3. “FortisBC has also proposed a potential worker construction camp west of Squamish to mitigate accommodation pressure during construction.”

SOURCE: Environmental Assessment Office (2016) Eagle Mountain – Woodfibre Gas Pipeline Project: Assessment Report, page 17.

<https://projects.eao.gov.bc.ca/api/document/58869120e036fb0105768edb/fetch>