



Monday, 10th June, 2019

Mayor and Council
District of Squamish
PO BOX 310,
Squamish, BC, V8B 0A3

Sent via email to: council@squamish.ca

RE: Work Camp proposal for Woodfibre LNG/ FortisBC Eagle Mt. pipeline projects

Dear Mayor and Council,

We would like to express our concern about the proposal by LandSea to build a temporary work camp to serve the Woodfibre LNG / FortisBC Eagle Mountain – Woodfibre Gas Pipeline projects.

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.”*¹

SLRD policy 4.7 (Temporary Use Permits)² 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.”*³

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.”*⁴

¹ 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>

² 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>

³ 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>

⁴ 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>



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.”⁵

This means that the proposed LandSea workcamp is now officially tied to the Woodfibre LNG / FortisBC Eagle Mountain – Woodfibre Gas Pipeline projects.

However, in the environmental assessment (EA) applications for both Woodfibre LNG and FortisBC, the proponents 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). However, in their applications, neither proponent indicated that a work camp in Britannia Beach would be required, and the social and economic impacts of a work camp to accommodate workers for both Woodfibre LNG and the FortisBC pipeline projects were never assessed.

Given this substantial change to the temporary accommodation requirements for both projects, we are concerned that the social and economic impacts of the proposed LandSea work camp in Britannia Beach have not been properly assessed as part of the environmental assessment process for Woodfibre LNG and the FortisBC Eagle Mountain – Woodfibre Gas Pipeline projects.

We request for the District of Squamish to write a letter to the BC EAO and CEAA asking them to assess the economic and social impacts of a 500-person work camp in Britannia Beach as an amendment to the environmental assessments for the proposed Woodfibre LNG and FortisBC Eagle Mountain – Woodfibre Gas pipeline projects.

Sincerely,

Tracey Saxby BA/BSc (Hons I)

Executive Director

My Sea to Sky

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⁵ SLRD Board Agenda (22nd May 2019) Draft SLRD Board Minutes April 24 & 25, 2019. Page 36 of 552.

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

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>

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.

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>