

March 13, 2025

Anastasia Moreau, Planner 1 Peace River Regional District

Sent by email: anastasia.moreau@prrd.bc.ca

Re: Local Government File #25-001 Temporary Use Permit for a 30 person work camp at District Lot 181, Peace River District (PID: 011-979-763) – The Subject Property

Dear Anastasia Moreau,

Thank you for providing the opportunity for Ministry of Agriculture and Food (Ministry) staff to comment on File #25-001 TUP, that requests a Temporary Use Permit to place six temporary housing structures and corresponding infrastructure on the Subject Property to house oil and gas workers. From a land use planning perspective, Ministry staff offer the following comments:

- The Survey Plan and Pre-Construction Environmental Assessment that are included in the application package do not appear relevant to the application for this Temporary Use Permit. The documents were issued in 2018 and describe specifics for a laydown yard that has already been created on the Subject Property.
- Ministry staff suggest requiring that the applicant provide a new site plan that shows the proposed location of the infrastructure associated with the work camp, including the portable housing units, water tank, generator, waste receptacles, light towers and sewage treatment system. Without the specifications of a site plan and corresponding details, the size of the land required for the camp and the possible effects of this temporary use on the Subject Property, are unknown.
- In addition to a site plan, Ministry staff recommend that the applicant be asked to produce a reclamation plan in conjunction with the specifics of the work camp being proposed. Components of the plan should include, but not be limited to, soil survey and agricultural capability analysis, topsoil

management, existing land use, site preparation, erosion control measures, weed management and final proposed agricultural capability.

- If they have not already done so, it is recommended that PRRD staff review the <u>ALC OGC Delegation Agreement</u>, and specifically Appendix 1, with the applicant to determine if an Agricultural Land Commission (ALC) Non-Farm Use application is required. The applicant has provided an approved ancillary permit from the BC Oil and Gas Commission (now BC Energy Regulator (BCER)) that was previously received in conjunction with the 2018 laydown site proposal on the Subject Property. The addition of a work camp of a certain size may trigger the need for an ALC Non-Farm Use application to be submitted to the BCER under the delegation agreement, section 26 of the *Agricultural Land Commission Act*.
- Ministry staff note that the parcel is located inside of the Agricultural Land Reserve (ALR). Based on <u>iMapBC</u> imagery, it appears a large portion of the subject parcel is currently under agricultural production.
- Based on the BC Soil Information Finder Tool (SIFT) mapping system, the portion of the subject parcel identified as the workcamp site has an agricultural capability rating of 70% 3X and 30% 4W. Land with agricultural capability ratings of 1-3 are considered "prime agricultural lands" with little to no specialty management practices required. Land with agricultural capability ratings of 4-5 may have some moderate limitations that require special management practices for sustainable cultivation but are well suited to perennial crops and forages. The subclass 'X' indicates that there is an accumulation of various mild limitations. The subclass 'W' indicates there could be excessive water in some areas. None of these limitations would prevent agricultural activities from taking place on the land.
- It should also be noted that during certain times of the season (spring seeding, fall harvest) there may be an increase of equipment traffic on the road that could impact traffic flows to and from the work camp.
- Weeds and soil borne diseases can greatly reduce the productivity of agricultural areas, and under the provincial <u>Weed Control Act</u> the land occupier has a legal obligation to control noxious weeds on the site. Given the likely increased traffic to and from the site, the Regional District may want to confirm with the applicant if a site-specific weed prevention and

control plan (with a special emphasis on cleaning equipment prior to being brought on site) will be developed as part of this proposal.

- Ministry staff recognize the value of reducing the need for worker trips to and from Fort St John or Hudson's hope and the important work of remediating the sector. Nonetheless, the impact of the proposed work camp location is unlikely to have a positive impact on the agriculture sector in the region.
- In conclusion, Ministry staff find that without current and up-to-date information such as a site survey, an environmental assessment and a reclamation plan, the application for temporary use on the Subject Property is incomplete.

Please contact Ministry staff if you have any questions regarding the above comments.

Sincerely,

Chelsey Andrews, MCP

Land Use Planner Strengthening Farming Program Ministry of Agriculture and Food <u>chelsey.andrews@gov.bc.ca</u> Phone: 1 250-850-1854

Brenna Schilds, P.Ag

Regional Agrologist- BC Peace Ministry of Agriculture and Food Brenna.schilds@gov.bc.ca Phone: 1 250-795-4101 Rayman Liu, P. Ag

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CC: Agricultural Land Commission – ALC.Referrals@gov.bc.ca

DEVELOPMENT SERVICES GENERAL COMMUNICATION

Your File #: 25-001 TUP eDAS File #: 2025-00840

Date: Mar/4/2025

Tourmaline Oil Corp. c/o Peace River Regional District 1981 Alaska Avenue, PO Box 810 Dawson Creek, British Columbia V1G 4H8 Canada

Attention: Planning Services, Peace River Regional District

Re: Proposal to construct a closed, dry 27-to-30-man camp. Located on PID 011-979-763, District Lot 181, Peace River District

The Ministry of Transportation and Transit (MoTT) is in support of the proposal of the camp to accommodate Oil and Gas Development in the area. The Ministry has the following comments:

- 1. Please ensure the applicant (Prospect Land and Environmental) applies for an Access, Resource and Industrial Road permit for the proposal.
 - Please note that multiple accesses may not be approved, applicant to consider having adequate turn around area in the event of the Ministry only being in support of one access to the lot.
- 2. If any road improvements on Jackfish Lake Road or Del Rio Road are proposed because of this work, please ensure the applicant (Prospect Land and Environmental) applies for a Road Works Permit.

If you have any questions, please send your inquiries to sarah.trouwborst@gov.bc.ca or you can call me at 778-576-8841.

Yours truly,



Sarah Trouwborst Development Technician

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