

March 25, 2024

*Via email: [eao.compliance@gov.bc.ca](mailto:eao.compliance@gov.bc.ca)*

Compliance and Enforcement Branch  
Environmental Assessment Office  
836 Yates St, Victoria,  
BC V8W 1L8

***RE: WOODFIBRE LNG PROJECT (E15-02) - AMENDMENT #3***

I write with respect to the above referenced project to request that your office clarify a term in Amendment #3 of Certificate E15-02 for the Woodfibre Liquefied Natural Gas project in Squamish.

Provision 29.1 states (underlining added for emphasis):

29.1 The Holder must implement a restriction of access to the DOS applicable to Workers residing on the Floatel that will not permit marine-based transportation off the Floatel for recreation, entertainment or other non-work-related activities. The Holder must require Workers, who were not residents within the DOS prior to September 20, 2023, to reside at the Floatel. The Holder may grant exceptions for extenuating circumstances, which may include place of residence being in the Sea-to-Sky Corridor, or Indigenous and cultural considerations. The Holder must keep a record of the exceptions with rationale for each exception. The Holder must provide a copy of the record of exceptions to the EAO upon request.

Within the past two weeks we have become aware that at least one, and possibly two, subcontractors to the Woodfibre LNG project are residing in temporary accommodation (AirBnB or VRBO) in Squamish and that they are not residents of Squamish.

We note that Amendment #3 defines a “Worker” for the purposes of this certificate as the following:

“Worker” Any person employed by the Holder of the Certificate, associated contractor or subcontractor, working at the Project or being housed in accommodations provided for the purpose of the Project’s Construction and Operation.

We also understand that the floatel is not currently in Squamish or operational. Therefore, we seek clarification as to whether this constitutes an exception, as contemplated in provision 29.1 of Amendment #3? If so, we kindly ask that you investigate to confirm that Woodfibre has complied with the requirement to record a rationale for the exception.

If it does not constitute an exception as contemplated in 29.1, could you kindly direct us to the provision in the permit that provides for subcontractors to reside in temporary accommodation in Squamish, including any appropriate mitigation strategies in place to reduce impacts on the local community.

We also respectfully request a response to this letter with an update on the outcome of this matter.

Sincerely,

*Sue Brown*

Sue Brown, JD, MA  
Director of Advocacy and Staff Lawyer  
Justice for Girls  
604-837-1069  
[sue@justiceforgirls.org](mailto:sue@justiceforgirls.org)