



Our File No. 2021-02-01

4 November 2021

**Directors of the Regional District of Fraser Fort George
Planning Department**
1100 Patricia Boulevard
Prince George, BC
V2L 3V9

VIA EMAIL: <developmentservices@rdffg.bc.ca> and <hmeier@rdffg.bc.ca>

Dear Directors,

**RE: REGIONAL DISTRICT OF FRASER FORT GEORGE'S CONSIDERATION OF WEST COAST OLEFIN'S
CURRENT ALC NON-FARM USE APPLICATION**

We act on behalf of Too Close 2 Home (a community group with over 800 members) on this matter. Below we address actions the Regional District of Fraser-Fort George (RDFFG) may take in response to the West Coast Olefins Ltd. application to the Agricultural Land Commission for non-farm use in the Pineview area. We make the legal argument that the Regional District should deny the application to proceed to the ALC, on both substantive grounds, and on the grounds that the public has been denied a fair and open procedure in this process.

SUMMARY:

West Coast Olefins Ltd (WCOL) has proposed a Natural Gas Liquid (NGL) Recovery Project. The NGL Recovery Project apparently includes the NGL Extraction Plant and the NGL Separation Plant, with a pipeline connecting the plants. WCOL has submitted an application to the Agricultural Land Commission (ALC) for designation of approximately 25 acres (encompassing a plant and pipeline) within the Agricultural Land Reserve (ALR) for a non-farm use (NFU).¹ Since the proposed location is in the Pineview area of the Regional District, this change in proposed use will also require a Regional District zoning amendment.

The WCOL request to designate this Agricultural Land Reserve (ALR) area for "non-farm use" should be refused. Permitting this proposed industrial project would directly undermine the "integrity and continuity"² of the ALR – a key priority of the ALC. The Board of the RDFFG has the discretion³ and a responsibility to deny the NFU application to proceed to the Agricultural Land Commission. By doing so, you will keep the use of this land consistent with the objectives and

¹ *Prince George NGL Recovery Project*, online: West Coast Olefins Ltd.
<<https://www.westcoastolefins.com/pg-ngl-recovery-plant>>.

² *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(2).

³ *Agricultural Land Commission Act*, SBC 2002, c 36, s.25(3).



purposes of the *Agricultural Land Commission Act*. Denial is also necessitated by the provisions of the Pineview Official Community Plan related to agricultural land and ALR.

The impacts of this project on agriculture are potentially serious, including:

- the permanent loss, fragmentation and pollution of farmland,
- permanent impacts on the viability of farming agriculturally-related activities in the area,
- ongoing potential pollution of farmland, and physical risk to farmers and other residents from toxic and carcinogenic substances and fires and explosions
- numerous other impacts listed below, and cited by residents in other submissions before you.

Substantive concerns about the nature and impacts of this project on ALR lands carry enough weight for the Board to deny forwarding the NFU Application to the ALC.

Second, serious procedural fairness concerns arise, related to the way this application has been dealt with. Residents have been denied the opportunity for formal public input -- **indeed, the majority of the public have been denied the opportunity to even see the ALC application in question.** Only this week, after repeated and persistent requests --and after filing Freedom of Information requests -- have a few select persevering residents obtained the actual application documents, including the company expert's report. But the rest of the public have not had an opportunity to even see what is actually proposed in the application here, and potential impacts. The vast majority of your residents have been given no access to the application itself. As a result, the Board will not have sufficient feedback from an **informed** public to be able to decide on this matter at this time.

It is simply unacceptable that the District informed concerned members of the public that they had **no right** to access the company application, unless they filed inconvenient and time consuming formal FOI requests (See Appendix A.). Why were formal FOI requests required to see documents that are the very substance of an imminent government decision that will change the nature of an entire neighbourhood? **Why wasn't the application posted publicly for all citizens to see?**

It is bizarre that concerned residents were told that they could not simply be given a copy of the application in question -- and that even those who pursued a formal Freedom of Information request only received the application in question when it was too late to properly assess the application, mere days before the deadline for comment.

The residents of Pineview and surrounding areas will be seriously and permanently impacted by this project if it is allowed to proceed. This is not a minor NFU application—it is not a simple non-farm building being approved on ALR land. The proposed project here is a major permanent industrial development on farm land. As such it must be treated with the gravity it demands. Residents should be given the respect of transparency, given basic information about the application, and given the chance to be heard with regards to a project that will seriously affect their lives, farms, and homes.

We submit that the lack of procedural fairness should also cause the Board to deny forwarding the application to the ALC at this time.

APPLICABLE LAW AND POLICIES:

Agricultural Land Commission (ALC) Act

The Agricultural Land Reserve (ALR) is a provincial zone in which agriculture is recognized as the priority use.⁴ The Agricultural Land Commission is an independent administrative tribunal made up of appointed Commissioners that are responsible for administering the *ALC Act*.⁵

The purposes of the ALC are set out in section 6(1) of the *ALC Act*:⁶

- a) “to preserve the agricultural land reserve;
- b) to encourage farming in collaboration with other communities of interest; and
- c) to encourage local governments, First Nations, the government, and its agents to enable and accommodate farm use of agricultural land and uses compatible with agriculture in their plans, bylaws and policies.”

In fulfilling these purposes, priority must be given to “protecting and enhancing”:

- a) “the size, integrity and continuity of the land base of the agricultural land reserve;
- b) the use of the agricultural land reserve for farm use.”⁷

Overview of ALC Non-Farm Use Application Process

Local governments have defined roles and responsibilities in regulating land uses in the ALR. When an application is made under the *ALC Act* for exclusion of land from the reserve, or for designation as “non-farm use”, that application is submitted to local government who will review it. Section 25(3) of the *ALC Act*,⁸ provides that **local government must authorize a use application to the ALC, if the application concerns land that is zoned for farm use or requires an amendment to zoning.**⁹ (In this case where a zoning amendment must be obtained, the local government has the discretion to decide whether or not to authorize a NFU under s. 25(3). Only with local government (RDFFG) authorization, can the application for NFU proceed to the ALC.

⁴ Provincial Agricultural Land Commission, “Living in the ALR”, online: *Provincial Agricultural Land Commission* <<https://www.alc.gov.bc.ca/alc/content/alr-maps/living-in-the-alr>>.

⁵ Provincial Agricultural Land Commission, “About the ALC”, online: *Provincial Agricultural Land Commission* <<https://www.alc.gov.bc.ca/alc/content/about-the-alc>>.

⁶ *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(1), Emphasis added.

⁷ *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(2), Emphasis added.

⁸ *Agricultural Land Commission Act*, SBC 2002, c 36, s.25(3) reads:

“(3) An application referred to in subsection (1), except such an application from a first nation government, may not proceed unless authorized by a resolution of the local government if, on the date the application is made, the application

(a) applies to land that is zoned by bylaw to permit farm use, or

(b) requires, in order to proceed, an amendment to an official settlement plan, an official community plan, an official development plan or a zoning bylaw.”

⁹ *Working with Local Governments*, online: Provincial Agricultural Land Commission

<<https://www.alc.gov.bc.ca/alc/content/about-the-alc/working-with-local-governments>>. See s. 23(3) of the *ALC Act*.

If the NFU application proceeds to the ALC and is compliant with regulations, then the ALC has three options:

1. "Refuse permission for the use or subdivision applied for";¹⁰
2. "Grant permission, with or without limits or conditions, for the use or subdivision applied for, or"¹¹
3. "Grant permission for an alternative use or subdivision, with or without limits or conditions, as applicable."¹²

Regional District of Fraser Fort George's ByLaws, Policies, and Authority Concerning ALR Use Applications and Public Consultation

Regional District ALR Applications Policy

The RDFFG has set out their process for reviewing ALR Applications in Policy RD-15-19. This policy outlines that when the Board of the RDFFG is considering an application for use or subdivision under s.25 of the *ALC Act*, they may decide to do one of the following:

- a) "Approve the application to proceed to the ALC for a final decision with:
 - i. a recommendation to approve the application; or
 - ii. no recommendation.
- b) Deny the application to proceed to the ALC for a final decision.
- c) Postpone consideration if further information is requested by the Regional District Board, prior to considering an application."¹³

Prior to the Board's decision, District Policy requires "a public input stage" **only** if the application does not require an Official Community Plan, Zoning Bylaw or Rural Land Use Bylaw amendments or temporary Use Permit decisions. However, the Policy states that there will be no public input stage if the application requires "an Official Community Plan, Zoning Bylaw, or Rural Land Use Bylaw amendment or a Temporary Use Permit approved by the Board prior to the use being established".¹⁴ (Instead of providing a public input stage, the District has a policy of simply receiving unsolicited comments regarding an application and forwarding them to the Board for consideration.¹⁵) **In the current case, no public input stage is being provided, ostensibly because the required zoning amendment will require a public hearing eventually – after the Board has already made its statutory decision to forward the application to the ALC**

¹⁰ *Agricultural Land Commission Act*, SBC 2002, c 36, s.25(1)(b)(i).

¹¹ *Agricultural Land Commission Act*, SBC 2002, c 36, s.25(1)(b)(ii).

¹² *Agricultural Land Commission Act*, SBC 2002, c 36, s.25(1)(b)(iii).

¹³ Regional District of Fraser Fort George, "Policy RD-15-19 – Agricultural Land Reserve Applications" at s.1., online:

<<https://rdffg.civicweb.net/document/107241/Agricultural%20Land%20Use%20Standing%20Committee%20-%202021%20N.pdf?handle=C0308AA9E219497CBB3CC1B29D3B0362>> at p 22.

¹⁴ Regional District of Fraser Fort George, "Policy RD-15-19 – Agricultural Land Reserve Applications" at s.2., online:

<<https://rdffg.civicweb.net/document/107241/Agricultural%20Land%20Use%20Standing%20Committee%20-%202021%20N.pdf?handle=C0308AA9E219497CBB3CC1B29D3B0362>> at p 23.

¹⁵ If they are received prior to the Board meeting agenda deadline. Regional District of Fraser Fort George, "Policy RD-15-19 – Agricultural Land Reserve Applications" at s.2(a)., online:

<<https://rdffg.civicweb.net/document/107241/Agricultural%20Land%20Use%20Standing%20Committee%20-%202021%20N.pdf?handle=C0308AA9E219497CBB3CC1B29D3B0362>> at p 23.

Official Community Plan Provisions

The Pineview area of the Regional District has its own Official Community Plan which states land use objectives that must guide land use planning decisions for the Pineview area.¹⁶ The Pineview Official Community Plan¹⁷ states:

“Section 4.14 Agricultural Land

With respect to the protection of the agricultural land base the **Regional Board** will:

- i) support the *Agricultural Land Commission Act* with its general objective of protecting agricultural land for future food production;
- ii) discourage and restrict the fragmentation of agricultural land by subdivision by means of generally large minimum parcel size regulations;
- iii) direct non-farming residential uses primarily to lands designated Rural Residential (RR) and Rural Holding (RH).
- iv) not promote development of agricultural land for non-agricultural uses unless it is shown that there is no practical alternative location or that it will not be detrimental to the long-term agricultural potential of the land.
- v) support the buffering of agricultural land in the Agricultural Land Reserve from the impact of new non-agricultural subdivision and non-farm uses that may include the provision of leave strips.”

“Section 6.6 Agricultural Land Commission

Proposals for the non-agricultural use or subdivision of lands within the Agricultural Land Reserve (ALR), that are not permitted by the *Agricultural Land Commission Act*, regulations thereto or Policies of the Agricultural Land Commission, require application to the Commission and will be considered for a Regional Board recommendation based upon the provisions of this Plan, and their potential impact on the agricultural viability of the subject property and surrounding area.”

¹⁶ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at s. 1.1.

¹⁷ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at pp. 15, 29; emphasis added. Additionally Section 6.6.1 of the *Pineview Official Community Plan* outlines that the Commission still has discretion to make the final decision, despite the degree of compliance with the Community Plan: “Section 6.6.1 - The Regional Board recognizes that the Agricultural Land Commission’s mandate for the preservation and enhancement of agricultural land requires their analysis of individual applications for subdivision or non-farm use of land within the Agricultural Land Reserve based on the specific merits of each proposal, and the Commission is not obligated to approve applications that comply, or alternatively, refuse applications that do not comply, with this Plan.

However, in consulting with the Agricultural Land Commission in the development of this Plan, it is understood that the Commission does concur with the content of the Plan, thereby setting a level of certainty of the nature of future development directions in the Plan area.”

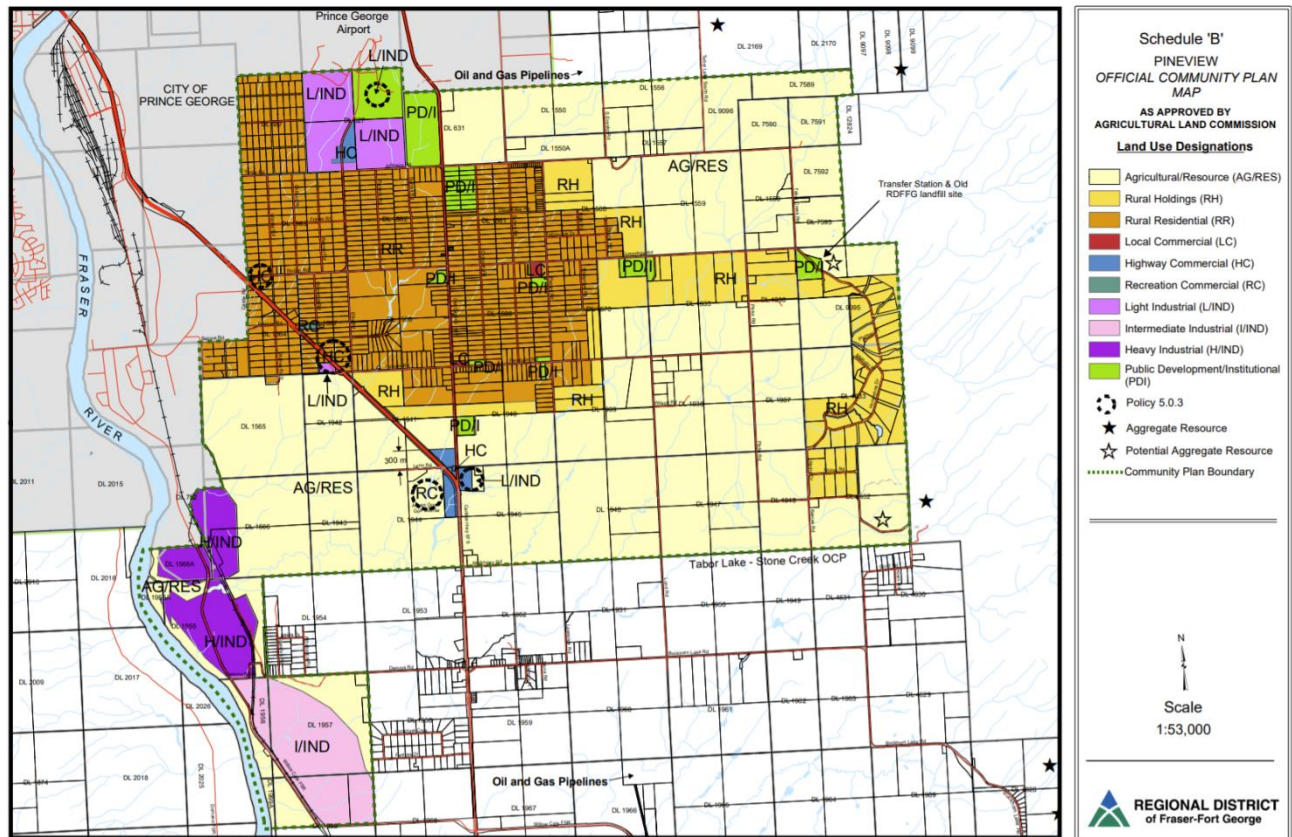


Figure 1. Map of the land use designations of the Pineview area from the Pineview Official Community Plan.

Regional District Discretionary Power to Hold Public Consultations

Finally, the *Local Government Act* grants the board of a regional district the discretionary power to hold public consultations and other community engagement processes, pursuant to s. 293:¹⁸

“(1) [...] a board may seek the opinion of the electors of the regional district on a question that the board considers affects the regional district, by voting or another process the board considers appropriate.

The terms “another process” and “any other process” are sufficiently broad to encompass public consultations and input.

Notably, if a zoning bylaw is to be adopted, a local government must first hold a public hearing.¹⁹ This requirement is confirmed in the RDFFG’s bulletin on “Development Services: Public Hearings and Zoning Amendment” which states that if there is a proposed amendment to an Official Community Plan Bylaw or Zoning Bylaw, a public hearing must be held.²⁰

¹⁸ *Local Government Act*, RSBC 2015, c 1, s.293.; Emphasis added.

¹⁹ *Local Government Act*, RSBC 2015, c 1, s. 464.

²⁰ British Columbia, Regional District of Fraser-Fort George, Development Services, *Public Hearings* (Prince George) <<https://rdffg.bc.ca/uploads/3090/Public-Hearings-Brochure.pdf>> at p 1.

Regional District Public Consultation Meeting Bulletin

According to the RDFFG's bulletin on "Development Services: Public Consultation Meeting"²¹, an ALR subdivision or non-farm use application may trigger a public consultation meeting: "Public consultation opportunities may be required prior to a formal public hearing and for the following applications, at the discretion of Development Services and the Regional District Board. Land use applications that include the following: ...Agricultural Land Reserve Application – applications for non-farm use within the Agricultural Land Reserve."²²

Clearly, the District has ample jurisdiction to conduct more extensive consultation than has taken place.

CRITICAL LEGAL ANALYSIS:

Issue 1: Whether the Board of the RDFFG should deny the application to proceed to the ALC on the substantive grounds that it does not align with the purpose of the ALR and the Pineview Official Community Plan

The magnitude and scale of this project's potential impacts on the ALR warrants a comprehensive review to determine whether this application is in alignment with the Agricultural Land Reserve objectives and the Pineview Official Community Plan. Yet the evidence indicates that this project runs counter to both Agricultural Land Reserve legislation and policy and the OCP. **Therefore, the Regional District Board must refuse the ALC application for non-farm use of this land from WCOL for a Natural Gas Liquids Recovery Project.**

Section 6.6 of the Official Community Plan states that **applications for non-agricultural use of land within the ALR "will be considered for Regional Board recommendation based upon provisions of this Plan."**²³

However, to be in alignment with the Pineview Official Community Plan, the Board must be satisfied that the proponents have demonstrated that "there is no practical alternative location or that it will not be detrimental to the long-term agricultural potential of the land"²⁴. This is an explicit requirement of the District Official Community Plan. Additionally, the Board must take into account that the Agricultural Land Commission Act requires the Commission to give priority to protecting and enhancing "the size, integrity, and continuity of the land base" of the ALR for farm use.²⁵

²¹ British Columbia, Regional District of Fraser-Fort George, Development Services, *Public Consultation Meeting* (Prince George) < <https://rdffg.bc.ca/uploads/1162/Public-Consultation-Meeting.pdf> > .

²² British Columbia, Regional District of Fraser-Fort George, Development Services, *Public Consultation Meeting* (Prince George) < <https://rdffg.bc.ca/uploads/1162/Public-Consultation-Meeting.pdf> > at p 1.

²³ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at s. 6.6.

²⁴ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at p. 15.

²⁵ *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(2) which reads: "The commission, to fulfill its purposes under subsection (1), must give priority to protecting and enhancing all of the following in exercising its powers and performing its duties under this Act:

(a) the size, integrity and continuity of the land base of the agricultural land reserve;

It is unclear in WCOL's application for NFU whether there is truly **no** practical alternative location, as required by the OCP. In the NFU Application, WCOL identifies several sites that they have canvassed and found unsuitable for a range of reasons from proximate residential density to natural terrain to breakdown in negotiations with First Nations²⁶ or landowners.²⁷ However, WCOL does not claim that there is "no practical alternative" location for such a plant along the entire Westcoast Pipeline. The OCP **requirement** that there is "no practical alternative" has simply not been met.

In addition, despite the claimed mitigating aspects identified by WCOL in their NFU Application, the proponent has not established that the project will "not be detrimental to the long-term agricultural potential of the land" as required by s. 4.14 (iv) of the Pineview Official Community Plan. The purpose of the ALC is to protect the land in the ALR for agricultural use, an objective that the RDFFG explicitly supports. WCOL is proposing to remove 25 acres of agricultural land to use it for a heavy industrial operation with little indication or assurance that this land can be reclaimed for future farm use. These are problematic omissions that bring potential risks.

The report prepared by Blackbird Environmental Ltd. in support of this project outlines a cursory "Preliminary Recovery Plan"²⁸ which highlights that a professional agrologist who is trained and experienced in restoration should be retained to establish better, more comprehensive plan "at the time of reclamation."²⁹ Additionally, there is little consideration given to the impacts of fragmentation of the ALR in the cursory recovery plan. We submit that this is inadequate to demonstrate the long-term integrity and continuity of the ALR.

Finally, WCOL's own consultants highlight that the proposed site would be on soils that have a level of agricultural capability. To insert an industrial NFU into an otherwise intact and unfragmented agricultural landscape, would be inconsistent with the ALC's mandate to preserve ALR for farm uses and "uses compatible with agriculture".³⁰ Permitting this NFU would be

(b) the use of the agricultural land reserve for farm use."

²⁶ The Lheidli T'enneh First Nation has been clear and vocal about the fact that they are in opposition to this proposed project. Lheidli T'enneh First Nation Chief Dolleen Logan stated on behalf of the nation's members, Chief and Council and administration: "I want the Canadian financial and energy sectors to be very clear about our position. West Coast Olefins is not welcome in our territory and on our unceded ancestral lands." - Hannah Peterson, "Lheidli T'enneh First Nation says West Coast Olefins projects not welcome in territory", online: (2021) Prince George Citizen <<https://www.princegeorgecitizen.com/local-news/lheidli-tenneh-first-nation-says-west-coast-olefins-projects-not-welcome-in-territory-4193220>> .

²⁷ West Coast Olefins, "NGL Recovery Project – ALC Application – Extraction Plant and Access Road – Non-Farm Use Status" (September 2021) at pp. v-xi. Obtained through Freedom of Information Request to the RDFFG on November 1, 2021.

²⁸ Blackbird Environmental Ltd., "Agricultural Capability Assessment and Soil Management Plan" (5 August 2021), pp. 10-11. Obtained through Freedom of Information Request to the RDFFG on November 1, 2021.

²⁹ Blackbird Environmental Ltd., "Agricultural Capability Assessment and Soil Management Plan" (5 August 2021), pp. 10. Obtained through Freedom of Information Request to the RDFFG on November 1, 2021.

³⁰ *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(1)(c).

inconsistent with the Pineview Official Community Plan which mandates that the Board consider the “agricultural viability of the subject property and surrounding areas”.³¹

The point is that this proposal is of immense scope and impact. This proposed NFU application is in no way comparable to an ALC application for an additional NFU building on a property or a small bed and breakfast – both arguably compatible with agriculture. **WCOL is proposing a massive permanent industrial plant that has the potential for serious and permanent damaging effects to the area’s residents and the natural and agricultural environment.** Examples of the potential harms of this project – such as human health hazards, fire and explosion hazards, pollution hazards, impacts on water, potential climate change impacts, impacts of man camps on a rural community -- are generally discussed in the Environmental Law Centre’s recent submission to the Minister of Environment and Climate Change Strategy about the original larger WCOL proposal.³²

Stated Public Concerns About Agricultural and Other Impacts

The residents of Pineview have also been vocal about their objections to this proposed project and have many short-term and long-term concerns.³³ Over 1800 signatures that have been collected on a Pineview petition opposing WCOL proposal.³⁴ Both residents and experts have raised concerns about agricultural and other impacts. The concerns of Pineview residents and the irreversible harms that would result in allowing this proposed project to move forward include, but are not limited to:

- The loss of some of the best and only farmland in the area and the proximity of the project to remaining farmland.
- The loss of and pollution of agricultural land that produces food for human and animal consumption. The proposal may seriously impact regional food insecurity. Prince George and the region are heavily dependent upon external sources and can be easily cut off via natural issues (i.e. fire, mud slides etc.) and thus food security should be a priority.
- The fragmentation and taking up of agricultural lands by new roads and infrastructure (eg. through widening). Increased industrial vehicular traffic and risks which accompany such work are also of concern.

³¹ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at s. 6.6. See the quote from that section in the text above.

³² The Environmental Law Centre, “Prince George Ethylene Project Regional Assessment Request” (August 25 2021), online: <<https://elc.uvic.ca/publications/ethylene-project-ra-request/>>.

³³ Caden Fanshaw, “‘This is not the right place for it,’: Pineview residents upset at possibility of new Westcoast Olefins plant”, online (2021) CKPGToday < <https://ckpgtoday.ca/2021/07/28/this-is-not-the-right-place-for-it-pineview-residents-upset-at-possibility-of-new-westcoast-olefins-plant/> >; Ted Clarke, “Not in my backyard! Pineview residents express concerns about proposed petrochemical project”, online (2021) Prince George Citizen <<https://www.princegeorgecitizen.com/local-news/not-in-my-backyard-pineview-residents-express-concerns-about-proposed-petrochemical-project-3965725>>; Oli Herrera, “Pineview residents still concerned following West Coast Olefins’ scrapped project”, online (2021) CKPGToday <<https://ckpgtoday.ca/2021/10/21/pineview-residents-still-concerned-following-west-coast-olefins-scrapped-project/>>.

³⁴ Number of signatures on paper petition as of October 20, 2021. Please contact Too Close 2 Home to obtain most up-to-date numbers.

- Risks to general human safety in the wake of the 2018 pipeline explosion in Shelley.³⁵
- Risk to BC Hydro lines in the area. Specifically, the proximity to hydro lines coupled with explosion risk on the pipeline may increase the likelihood of loss of electricity to region for substantial length of time.
- The irreversible impacts on agricultural livelihood and the agricultural character of the area leading to the loss of income from agricultural sources.
 - Considerable participation in things like local farmers markets, contributing to food security may be negatively impacted or lost; and
 - Loss of ability to attract the next generation of farmers in the area, keeping in mind the context that the average age of BC farmers is over 50 years old and BC and federal governments have expressed concern about recruiting the new generation of food producers and processors.
- Negative health impacts on human residents and both domestic and wild animals in the area. This includes the potential displacement and extirpation of wildlife that live in the ALR including some considered to be regionally vulnerable such as grizzly bears and moose.
- Loss of value and enjoyment of homes and property within the ALR.
- Negative impacts on local water sources including wetlands areas which act as corridors and habitat for wildlife.

The very purpose of the ALR is at risk if exemptions are for major industrial developments are granted. The ALC Act obliges local governments to consider the “integrity and continuity”³⁶ of the ALR. In addition, s. 4.14 of your own Pineview OCP requires that you “discourage fragmentation of agricultural land” and respect the boundaries of the ALR.³⁷

Your OCP further requires that you:

“not promote development of agricultural land for non-agricultural uses unless it is shown that there is no practical alternative location or that it will not be detrimental to the long-term agricultural potential of the land.”³⁸

Based on the information before us, neither condition is met. The RDFFG Board’s decision hold significant weight for the ALC. Thus, the Board of the RDFFG should deny the application to proceed to the ALC on the substantive grounds that it does not align with the purpose of the Agricultural Land Reserve and the Pineview Official Community Plan.

³⁵ Andrew Kurjata, “A year after Prince George pipeline blast, B.C. First Nation wants answers” (9 October 2019), online: *CBC News* < <https://www.cbc.ca/news/canada/british-columbia/enbridge-pipeline-prince-george-one-year-1.5313608> >.

³⁶ *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(2).

³⁷ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) online: <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at s. 4.14(ii).

³⁸ British Columbia, Regional District of Fraser-Fort George, *Bylaw No 2302 Pineview Official Community Plan* (2006) online: <https://rdffg.bc.ca/uploads/Planning/OCP/PineviewOCP_text.pdf> at s. 4.14(iv).

Precedents

There are several instances of Regional Districts refusing an ALC application for non-farm use. One example is from the Sunshine Coast Regional District.³⁹ It refused the application and did not forward it to the ALC based on considerations including a lack of sufficient analysis or evidence of a detailed farm plan, drainage plan and no professional Agrologist report.

The ALC has also refused applications for non-farm use based on the agricultural capabilities of the land. One example specifically considered the soil class⁴⁰ and refused the application since it was prime agricultural land⁴¹ that must be protected in accordance with the *ALC Act*.

In sum, the District Board should refuse to forward this NFU application to the ALC after considering the legislated provisions governing the Agricultural Land Reserve, the guidance from the Pineview Official Community Plan, and the clear opposition from local residents who highlight numerous and substantial potential negative impacts.

Issue 2: Whether the RDFFG Board should deny the application to proceed to the ALR on the procedural grounds that there was lack of adequate public consultation, and a failure to reveal the application to the general public.

In the alternative, if the District Board does not deny the application on substantive grounds outlined above, it must deny it on the clear failure of fair procedure. As outlined above, the impacts, harms and concerns over this proposed project are of such a magnitude that the District must afford residents an opportunity to become informed about what their government is doing.

Yet no formal public input process is being provided here. Indeed, the public has not had access to what is actually being proposed here, and what impacts have already been identified for the ALC by the company itself. **Critical information (including the actual application to the Agricultural Land Commission and the accompanying company expert report) have not been made publicly available.** To borrow an agricultural phrase, the majority of the public are being

³⁹ ALC Application 60835 (Sunshine Coast Regional District Staff Report: Planning and Community Development Committee, May 20 2021), online:

<<https://www.scrd.ca/files/File/Administration/Agendas/2021/2021-MAY-20%20PCD%20Agenda%20Package.pdf>>.

⁴⁰ British Columbia, Ministry of Agriculture and Food, *Land Capability Classification for Agriculture in British Columbia* (Kelowna: Ministry of Environment, 1983), online: <<https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/agriculture-and-seafood/agricultural-land-and-environment/soil-nutrients/moem1.pdf>> at pp 9-12. - "Soil Classes - Class 2 - land is capable of producing a wide range of crops. Minor restrictions of soil or climate may reduce capability but pose no major difficulties in management. Class 3 - land is capable of producing a fairly wide range of crops under good management practices. Soil and/or climate limitations are somewhat restrictive. Class 4 – Land is capable of a restricted range of crops. Soil and climate conditions require special management considerations. Class 5 – Land is capable of production of cultivated perennial forage crops and specifically adapted crops. Soil and/or climate conditions severely limit capability. Class 7 – land has no capability for soil bound agriculture."

⁴¹ Agricultural Land Commission, "Re: Application 53333 to exclude land from the Agricultural Land Reserve" (Feb 19 2018), online: <https://www.alc.gov.bc.ca/assets/alc/assets/applications-and-decisions/search-for-applications-and-decisions/2018-decision-minutes/53333d1_hays-butler.pdf>.

asked to buy a “pig in a poke”.⁴² Just as sixteenth century market goers were advised never to buy a piglet without taking it out of the poke (burlap bag), residents here should be able to see the application before they assent to it.

See Appendix A for information about the difficulty faced by residents in simply obtaining a copy of the application that you are considering.

The problem is that RDFFG’s Policy RD-15-19 explicitly **prevents** formal public input when the ALR application requires “Official Community Plan, Zoning Bylaw, or Rural Land Use Bylaw amendment or Temporary Use Permit approved by the Board prior to the use being established”. The project proposed by WCOL will require a Zoning amendment and thus the District has not provided a public input process before the Board considers whether to forward the application to the ALC.

Instead, the RDFFG will field unsolicited written comments and forward them to the Board for consideration – if they are received before the Board meeting agenda deadline. **It is important to note that the contents of the application will only be made widely and publicly available when the meeting agenda is posted, days after the deadline for unsolicited public comment.** Furthermore, concerned members of the public must take extra efforts to navigate the bureaucracy and learn that to access this information, they must submit a Freedom of Information Request. **This policy means that the vast majority of concerned residents will not have the actual ALC application in question available to them, to make an informed unsolicited comment to the Board.**

How can the Board take any action on this at this time, when members of the public have not been able to examine the “pig in a poke”?

This District policy frustrates several basic legal requirements of procedural fairness -- including the right of those affected by this decision to be heard and the right to be given timely disclosure of information. This procedure of not letting the general public see the actual application in play, will fundamentally undermine the quality and utility of the comments received by the Board – and undermine the value and validity of any Board decision based on input from an inadequately informed public.

The District Board has received an overwhelming amount of feedback from residents about their concern for this proposed project. A public consultation meeting may not just be an appropriate way of addressing these -- but a necessity given the magnitude of change in land use and opposition towards it. There is significant resident concern about the profoundly inadequate consultation from the proponents.

Furthermore, Community members have stated that notice of this proceeding was highly selective consultation, i.e. only sent letters to people within 3.5 km of site despite a much broader area potentially being affected. Additionally the proponent has reportedly declined two invitations to speak to residents. Thus it is the local government’s responsibility to ensure that adequate information is provided to the residents, and that public input occurs before making the decision regarding the NFU Application.

⁴² In the sixteenth century the bag used to carry piglets to market was called a poke. To buy a pig in a poke is to buy something – or decide something – without proper examination.

In the absence of the fundamental procedural fairness elements such as the right to be heard and the right to disclosure of relevant information, the Board should deny forwarding the NFU application to the ALC.

(Additionally, in the long run the Board should consider revising Policy RD-15-19 to include adequate procedural fairness elements in the upcoming review slated for December 2021.⁴³)

Precedents

The Peace River Regional District has an example of an ALC application that was deferred until the Official Community Plan was reviewed and completed.⁴⁴ This decision considered the agricultural use, and the context specifically stating, “This proposal is not keeping with the context of the area. Many of the surrounding parcels are actively farmed.” It also included several letters from residents that expressed their concerns and opposition to the development.

The Regional District of Bulkley Nechako held a public hearing over concerns about an ALC application to exclude land from the ALR for non-farm use.⁴⁵ This is an example of where greater public consultation was implemented and gave residents a chance to speak before a decision was made.

The District of North Saanich deferred an ALC application for non-farm use to the Community Agricultural Commission and the Community Planning Commission and recommended that a Public Information Meeting be held.⁴⁶ This is an example of where the application warranted greater consultation before a decision could be made about whether to forward it to the ALC. Considerations for this deferral included traffic, safety, noise, agricultural capability, and the level of industrial use of the development (i.e. light vs. heavy).

Therefore, if the District Board does not feel the ALC application can be outright refused at this stage for substantive reasons, it should be refused for lack of procedural fairness. The potential impacts this non-farm development would have on local residents warrants that their concerns are given thorough consideration by the District Board and that the residents are adequately informed when expressing their views.

⁴³ Regional District of Fraser Fort George, “Policy RD-15-19 – Agricultural Land Reserve Applications” (Amended December 17, 2020, Next Review Date December 1, 2021).

⁴⁴ Services Exclusion from The Agricultural Land Reserve (ALR) File No. 059/2016 (Peace River Regional District Development: April 20 2016) online <https://prrd.bc.ca/board/agendas/2016/2016-15-793500157/pages/documents/09-R-03059_16_Middleton_ALRexcl.pdf>.

⁴⁵ Priyanka Ketkar, “RDBN, CSFS hold public hearing for Vanderhoof’s proposed addiction treatment facility”, online: (2021) Today in BC <<https://www.todayinbc.com/news/rdbn-csfs-hold-public-hearing-for-vanderhoofs-proposed-addiction-treatment-facility/>>.

⁴⁶ ALC Non-Farm Use Application -10375 Wilson Road, File: 3015-20 ALR Application 2020-01 ALR (District of North Saanich Staff Report: April 17 2020) online <<https://northsaanich.ca/wp-content/uploads/2020-04-17-ALC-Non-Farm-Use-Application-10375-Wilson-Road.pdf>>.

CONCLUSION:

The above legislation and precedents demonstrate that the Regional District of Fraser-Fort George should refuse WCOL's NFU Application to build this harmful NGL Recovery Project. As outlined in Pineview's Official Community Plan and the ALC's purpose, the District Board must protect this agricultural land for agricultural use to maintain the "integrity and continuity"⁴⁷ of the ALC. The use proposed by WCOL is industrial in nature. Ultimately, it is not clear based on the information before us whether there was no practical alternative location or whether the project will not be detrimental to the long-term agricultural potential of the land. **The proposed project runs contrary to the objectives set out by the ALC and in the Pineview Official Community Plan -- and should thus be denied.**

In the alternative, if the Board is not compelled by the substantive reasons for denying the application, it should be denied due to lack of fair process. Fair process includes the right to be heard and the right to disclosure of information that is before the decision-maker, in a timely manner. Ultimately, procedural fairness ensures accountability to the public and confidence in the decision being made. This is not true in this case and thus the Board should deny forwarding the application to the ALC.

In sum, we call upon the Regional District of Fraser Fort George to act on your citizens' many calls for refusal of this application based on substantive concerns and procedural concerns. This would serve to address their pressing concerns related to the loss of prime agricultural land, community health, a future of food insecurity, and the detrimental social and other impacts arising from the proposed NGL Recovery Project.

Sincerely,

"Calvin Sandborn"

Calvin Sandborn, QC, Barrister and Solicitor

"Vivian Esmailzadeh"

Vivian Esmailzadeh, JD Student

"Christa Croos"

Christa Croos, Articled Student

We, Calvin Sandborn, Vivian Esmailzadeh, and Christa Croos, consent to comments contained in or attached to an email sent to the Regional District becoming public information. I understand that this means that the comments may be placed on a public meeting agenda of the Regional District and may be forwarded to the Agricultural Land Commission for their use.

⁴⁷ *Agricultural Land Commission Act*, SBC 2002, c 36, s.6(2).

Appendix A

Email Correspondence between Paul Sandborn and Heather Meier

From: Paul Sanborn <Paul.Sanborn@unbc.ca>
Sent: 2021-10-28 1:15 PM
To: Development Services <developmentservices@rdffg.bc.ca>
Subject: background information needed: West Coast Olefins ALR application

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.
I am preparing a submission to comment on the ALR-related application by West Coast Olefins (application number 63830; PID 006-284-582).

I reviewed the information available at the ALC's application portal, where I learned of a "professional report" filed by the applicant. The ALC was not willing to release this document to me, so I am making a direct request to the Regional District.

I note that your deadline for receiving public comments on this matter is November 5th, which is too tight if my only recourse is to file a FOI request which could take at least 30 days to yield a response.

As an Agrologist and soil scientist with more than 40 years of postgraduate training and professional experience, I am particularly interested in seeing what evidence and professional opinion(s) the applicant may have submitted regarding the implications of its project for the integrity of the Agricultural Land Reserve. I cannot exercise this aspect of my professional responsibilities if this essential background information is not made readily accessible in a timely way.

Regards,

Paul Sanborn, Ph.D., P.Ag.
Associate Professor
Ecosystem Science & Management Department
University of Northern British Columbia

Phone (250) 960-6661

From: Development Services <developmentservices@rdffg.bc.ca>
Sent: Thursday, October 28, 2021 3:38 PM
To: Paul Sanborn <Paul.Sanborn@unbc.ca>
Subject: RE: background information needed: West Coast Olefins ALR application

CAUTION: This email is not from UNBC. Avoid links and attachments. Don't buy gift cards.

Hello Paul,

Thank you for your email. Unfortunately your request for this record may only be processed through the Freedom of Information request prior to the information being published to a public Regional District meeting agenda.

An application has been submitted by West Coast Olefins Ltd. for Non-Farm Use in the Agricultural Land Reserve to construct, operate and reclaim a natural gas liquids extraction plant and associated access road on The West ½ of District Lot 1946 Cariboo District within Electoral Area D. This application is scheduled to go to the Regional District's Agricultural Land Use Standing Committee (the Committee) for consideration on November 18th, 2021. You can find monthly agenda's for Regional District meetings at this link: <https://www.rdffg.bc.ca/government/board-of-directors/meeting-agendas> The agenda for the November meetings will be published sometime on November 10th. These meetings are open to the public; however, in-person capacity is limited. These meetings are live-streamed through the Regional District's website. The link is <https://www.rdffg.bc.ca/government/livestream> (Please note: this link is updated the day of the meetings).

The Agricultural Land Commission Act and its Regulations do not require a default public consultation process by a local government (Regional District) prior to it considering whether to forward an ALR Non-Farm Use application to the Agricultural Land Commission (ALC) for a decision. The Regional District Agricultural Land Use Standing Committee will be asked to consider the application on November 18th and make a recommendation to the Regional District Board. Options include:

- approve the application to proceed to the ALC (with or without a recommendation of approval),
- deny the application from proceeding to the ALC, or
- postpone the application pending further information (i.e. information from administration, the applicant or public engagement).

The Regional District Agricultural Land Reserve Applications Policy RD-15-19 sets out the consideration process for applications for Non-Farm Use, Subdivision or Inclusion in the ALR. Policy Rd-15-19 directs that a public input stage only be undertaken prior to Committee/Board consideration when the proposal will not require a subsequent Official Community Plan amendment, Zoning bylaw amendment or Temporary Use Permit application. The West Coast Olefins proposal will require an application for Official Community Plan and Zoning bylaw amendments if it is forwarded to the ALC and receives approval from the ALC for Non-Farm Use in the ALR. A public engagement stage is not taking place prior to the application being forwarded to the Committee for consideration.

When a public input stage does not take place, Policy RD-15-19 indicates that if unsolicited written comments are submitted to the Regional District regarding the use or subdivision application, the written comments will be forwarded to the Board for consideration provided that the comments are submitted prior to the Board meeting agenda deadline. **Deadline for such comment is 8:00 am, November 5th, 2021.**

If you provide unsolicited written comments please include the following statement:

I, YOUR NAME, consent to comments contained in or attached to an email sent to the Regional District becoming public information. I understand that this means that the comments may be placed on a public meeting agenda of the Regional District and may be forwarded to the Agricultural Land Commission for their use.

Should the applicant, a member of the public, a RD Director, or a member of City of Prince George Council wish to view the application, unsolicited written comments or any other documents pertinent to this application, prior to them being published to a Regional District agenda, they will need to submit a Freedom of Information request to the Regional District for processing.

Heather Meier RPP, MCIP
 Planning Leader
 Regional District of Fraser-Fort George
 Phone: 250-960-4455
 Toll Free: 1-800-667-1959
 Email: hmeier@rdffg.bc.ca
 Web: www.rdffg.bc.ca

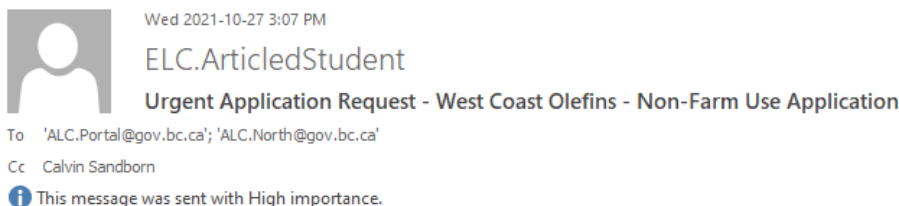
For updates on our COVID-19 response, please visit www.rdffg.bc.ca/news/covid-19

The information provided herein is for assistance and convenience only, and should not be relied upon as or as a substitute for legal advice. In the event of any conflict between the information provided herein and any enactments of the Regional District or the Provincial/Federal governments, the enactments will prevail. This email and any attachments are confidential. If you are not the intended recipient please notify me immediately by return email, delete this email and do not copy, use or disclose it

Notes and Correspondence of Christa Croos, ELC Articled Student Outlining Process of Obtaining a Copy of the ALR NFU Application

October 27, 2021 – Call with ALC Representative

- Placed a call to Michael McBurnie (Land Use Planner with the ALC for ALC North Region) to ask about accessing a copy of the NFU Application – following up on a written request sent on the same day:



Good afternoon,

I am emailing to request a copy of non-farm use application(s) filed by West Coast Olefins Ltd. in [September 2021](#) (according to their website). It is urgent that I obtain a copy of the application in full because the Regional District of Fraser Fort George is currently receiving submissions regarding this application and will be considering them on November 10.

If the application is not made public prior to November 5 (the deadline for submissions), local citizens will be deprived of the information necessary to make informed submissions to the Regional District, regarding the application.

The details we have available with regards to the application I am seeking, are as follows (as requested by the [Public Perusal of Records Policy](#)):

Applicant: West Coast Olefins Ltd. / Christine Olson (Agent)
Region: North
Local Government: Fraser Fort George
Type: Non-Farm Use
Application ID: Not available to us.
PID:

There is an existing application available on the Application Portal for "Transportation, Utility, or Recreational Trail Uses within the ALR", from the same applicant and related to the same project (Application ID: 63865), but I am unable to locate any information about related Non-Farm Use Application(s). The PID's, legal description, and maps associated with Application ID: 63865, may also be applicable to this request.

We appreciate your efforts and look forward to hearing from you.

Thank you,

Christa Croos (she/hers)
 JD (Environmental Law Specialization), MA, BSc
 Articled Student
 Environmental Law Centre
 University of Victoria, Faculty of Law

- Michael confirmed that the ALC has some information about the application but it is not complete and therefore not posted on the ALC Application Portal – he noted that he would look into sharing more information and follow up with me. He was able to share the Application ID and the Applicant for the NFU application. The Application ID is 63830 and the applicant is Christine Olson as agent for WCOL.
- Michael noted that the best way to obtain a copy of the application is to contact the Regional District of Fraser Fort George because they have the file.

October 27, 2021 – Call with Regional District of Fraser Fort George

- Placed a call to the Regional District of Fraser Fort George and inquired about accessing a copy of an ALR NFU Application that is being considered by them – was forwarded to the Planning Department.
- Spoke with an employee from the Planning department to whom I posed the same question – how can I access a copy of the ALR NFU Application before the deadline for unsolicited comment (November 5)? He placed me on hold to consult the Planning Leader, Heather Meier. They advised me that this is private information and the only way to access a copy of this would be to file a Freedom of Information(FOI) request directly with the RDFFG.
- I asked whether there would be a response before November 5th and the employee at the Planning Department said that while they have 30 days allowance by statute, that the request would likely be processed much faster than that. He then directed me to the webpage where I can find the FOI form and the email to submit the completed form to.

I then completed and submitted an FOI form on October 27, 2021. I received confirmation of receipt on October 28, 2021 and I responded thanking Mr. Hill:



Thu 2021-10-28 10:44 AM

ELC.ArticledStudent

RE: FOI Request Re ALR Non-Farm Use Application 63830

To: 'Freedom of Information Requests'

Cc: Calvin Sandborn

Good morning Mr. Hill,

Thank you for confirming receipt of our request and we look forward to any updates you may have.

Take care,
Christa

From: Freedom of Information Requests <foi@rdffg.bc.ca>

Sent: October 28, 2021 7:52 AM

To: ELC.ArticledStudent <ELC.ArticledStudent@uvic.ca>

Cc: Calvin Sandborn <csandbor@uvic.ca>

Subject: RE: FOI Request Re ALR Non-Farm Use Application 63830

Notice: This message was sent from outside the University of Victoria email system. Please be cautious with links and sensitive information.

Hello,

This is to confirm this request has been received.

Thank you,

Brandon Hill

Records Management Coordinator

Regional District of Fraser-Fort George

155 George Street, Prince George, BC V2L 1P8

Phone: 250-640-9381

Email: bhill@rdffg.bc.ca

This email and any attachments are confidential. If you are not the intended recipient please notify me immediately by return email, delete this email and do not copy, use or disclose it.

I received an email update on Monday November 1, 2021 that the FOI request has been processed and ready to access and that there would be a fee of \$36.90. I replied and inquired about the source of the fee and asked that the fee be waived under s. 75(5)(b) of the *Freedom of Information and Protection of Privacy Act*. The fee was waived and the record was released to be on Monday, November 1, 2021. See emails below:

Sent: Monday, November 1, 2021 2:51 PM
To: ELC.ArticledStudent <ELC.ArticledStudent@uvic.ca>
Subject: FOI 299/21
Sensitivity: Confidential

Notice: This message was sent from outside the University of Victoria email system. Please be cautious with links and sensitive information.

Re: WCOL ALR-Non Farm Use Application and Attachments
Our File no: 299/21

Hello,

Please see attached the following files:

- The Response Letter
- A VISA Authorization form that can be completed, signed, and returned to us authorizing us to charge your credit card for a specified amount. Once payment has been received we will release the records associated with this request and the receipt of your payment.

Please kindly acknowledge receipt of this e-mail.

Thank you,

Brandon Hill

Records Management Coordinator
Regional District of Fraser-Fort George
155 George Street, Prince George, BC V2L 1P8
Phone: 250-640-9381
Email: bhill@rdffg.bc.ca

This email and any attachments are confidential. If you are not the intended recipient please notify me immediately by return email, delete this email and do not copy, use or

From: ELC.ArticledStudent <ELC.ArticledStudent@uvic.ca>
Sent: 2021-11-01 3:24 PM
To: Freedom of Information Requests <foi@rdffg.bc.ca>
Cc: Calvin Sandborn <csandbor@uvic.ca>
Subject: RE: FOI 299/21
Sensitivity: Confidential

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.
Good afternoon Mr. Hill,

Thank you very much for your prompt response to this FOI request – we appreciate your urgency on this matter.

Can you please clarify whether we are required to send a payment if we had requested an electronic copy of the records? I am a bit confused by the fees per colour/black & white page... I thought that paper/mailling fees could be disposed of with electronic copies/communication.

Additionally, we would request that the fee be waived as the information about this proposal is a matter of public interest, including environmental health, public health, and safety (as outlined in s. 75(5) of the *Freedom of Information and Protection of Privacy Act*).

Looking forward to your response and thank you for your consideration,
Christa Croos

To: ELC.ArticledStudent <ELC.ArticledStudent@uvic.ca>
Cc: Calvin Sandborn <csandbor@uvic.ca>
Subject: RE: FOI 299/21
Sensitivity: Confidential

Notice: This message was sent from outside the University of Victoria email system. Please be cautious with links and sensitive information.

Hello,

Thank you for your inquiry. We still apply fees for digital records as there is still time and effort spent compiling and processing the records for release.

In regards to waiving the fees, I will forward your request to the FOI Head for their review.

Please let me know if you have any questions or concerns.

Thank you,

Brandon Hill

Records Management Coordinator
Regional District of Fraser-Fort George
155 George Street, Prince George, BC V2L 1P8
Phone: 250-640-9381
Email: bhill@rdffg.bc.ca

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From: ELC.ArticledStudent <ELC.ArticledStudent@uvic.ca>
Sent: 2021-11-01 3:40 PM
To: Freedom of Information Requests <foi@rdffg.bc.ca>
Cc: Calvin Sandborn <csandbor@uvic.ca>
Subject: RE: FOI 299/21
Sensitivity: Confidential

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.
Hi Mr. Hill,

Thank you for clarifying the breakdown of the fees and offering to forward our request for fee waiver to the FOI Head for review – do you have any idea how soon they may respond?

This is a fairly urgent matter as we would like to make informed submissions to the Board of RDFFG by November 5th at 8AM.

Thank you,
Christa



299_ALR_Application.pdf
7 MB

Notice: This message was sent from outside the University of Victoria email system. Please be cautious with links and sensitive information.

Hello,

Pretty fast for this one – the FOI Head has approved the waiving of the fee under s. 75(5)(b) of the *Freedom of Information and Protection of Privacy Act*.

Please find attached the records related to this request.

Please let me know if you have any issues opening the file.

Thank you,

Brandon Hill

Records Management Coordinator
Regional District of Fraser-Fort George
155 George Street, Prince George, BC V2L 1P8
Phone: 250-640-9381
Email: bhill@rdffg.bc.ca

This email and any attachments are confidential. If you are not the intended recipient please notify me immediately by return email, delete this email and do not copy, use or disclose it.