



July 12, 2021

File: 0280-30

Local Government File: C2021.014-TUP

Fiona Titley, Planner I
Regional District of Okanagan-Similkameen
Via Email: planning@rdos.bc.ca

Dear Fiona:

Re: C2021.014-TUP – Temporary Use Permit for Temporary Farm Worker Housing on 376 Road 6, Oliver (PID: 006-610-706) – The Subject Property

Thank you for providing the opportunity for the Ministry of Agriculture, Food and Fisheries (Ministry) staff to comment on this Temporary Use Permit application to allow for temporary farm worker housing of up to 12 farm workers on the Subject Property. From an agricultural perspective, the Ministry offers the following comments:

- Ministry staff note that based on the approved and associated Agricultural Land Commission (ALC) decision information ([ALC ID: 61750](#)), with the operation of 56 acres over 12 parcels in agricultural production and 37 currently employed temporary farm workers, the ALC is satisfied that the additional residence is necessary for farm use.
- Ministry staff note however that the ALC approval decision describes a 256.4 m² area residence for 12 workers based on a proposal of two 12' x 16' Jack and Jill Sleeper style trailers, and one 12' x 16' open office style trailer "...that will contain four kitchens and an open area/eating area...". This arrangement appears different from the floor plan submitted for this referral for a single 64' x 28' (166 m²) 12 person modular house that includes a kitchen. The Regional District of Okanagan Similkameen may wish to confirm the applicant's intended arrangement and ensure ALC approval.

- The Minister's Bylaw Standard for Temporary Farm Worker Housing (TFWH) (as published in the Ministry's [Guide for Bylaw Development in Farming Areas](#)) suggests a maximum useable floor area per worker of 10 m². The proposed modular house design of 166 m² for 12 people is only slightly more area per worker than the bylaw standard. However, Ministry staff note that the total footprint of the ALC approved proposed 256.4 m² TFWH residence is higher. Ministry staff recognize (as noted as well in the ALC decision) that Covid-19 has posed significant challenges with regard to housing of SAWP workers, and health of workers should be taken into consideration when planning new dwellings.
- Ministry staff further note that the temporary housing site is near to the road, close to the principal dwelling, planned for an area that is not in production, and would have minimal impact to current operations on the parcel. The design of the housing appears to consist of a modular design which could easily be removed when no longer required.

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

Sincerely,



Philip Gyug, P.Ag.
Regional Agrologist
BC Ministry of Agriculture, Food
and Fisheries
Philip.Gyug@gov.bc.ca
250-378-0573



Gregory Bartle
Land Use Planner
B.C. Ministry of Agriculture, Food and Fisheries
Phone: 778 974-3836
Email: Gregory.Bartle@gov.bc.ca

Email copy: Sara Huber, Regional Planner, Agricultural Land Commission
Sara.Huber@gov.bc.ca

RESPONSE SUMMARY

TEMPORARY USE PERMIT NO. C2021.014-TUP

Approval Recommended for Reasons Outlined Below

Interests Unaffected

Approval Recommended Subject to Conditions Below

Approval Not Recommended Due to Reasons Outlined Below

Thank you for the opportunity to provide comments for consideration regarding the above referenced application. It is our understanding that the application is to allow for accommodations to house up to 12 seasonal agriculture workers on the property. The following information is for your consideration:

The stated property is distance from many services and amenities, including access to public transit, which may negatively impact the mental and physical health of workers. Being connected to community and having easy access to amenities, services and social opportunities is important for health and wellbeing. If housing cannot be located closer to amenities, we encourage mitigation efforts be identified by the employer to prevent social isolation.

To support the health of the workers while living on the farm we recommend:

- Ensuring housing is built to provide safe and sanitary housing conditions factoring in the number of people that will be sharing the space;
- The housing provides adequate kitchen/cooking space and equipment in good working order including fridge(s), freezer space, working stove/oven(s), cooking and eating utensils. This is essential to support workers with preparing healthy meals and safely storing food;
- Laundry facilities are easily accessible in the worker housing or on the farm site;
- Workers are informed of and connected with local agencies and services that they can access for support if needed;
- Safe and reliable transportation is provided for workers to access amenities, services and connect socially with the community.

It is my understanding that the subject parcel is serviced by community water and not sanitary sewer systems. From an Environmental Public Health perspective, the following legislation may apply to this proposal:

1. Sewerage System Regulation (http://www.bclaws.ca/civix/document/id/complete/statreg/326_2004) prescribes any buildings in which domestic sewage is produced must be connected to the sanitary sewer system or a sewerage system.

a. The sewerage system will need to be altered or a new one constructed, as the current system likely does not have capacity for an additional building. Therefore the sewerage system must be designed and installed by or under the supervision of an Authorized Person. Record of Sewerage System and Letter of Certification must be filed with Interior Health. However, if connecting to an existing sewerage system it must be inspected and assessed by an Authorized Person to ensure it is functioning properly and can handle the additional flows.

b. For more information visit: <https://www.interiorhealth.ca/YourEnvironment/HBE/Pages/Onsite-Sewerage-Systems.aspx>

2. Industrial Camps Regulation (http://www.bclaws.ca/civix/document/id/complete/statreg/70_2012) prescribes the minimum housing standards which must be met. These standards are encouraged to be followed as best practice.

3. COVID-19 Accommodation Guidelines for Farm Workers are encouraged to be followed as best practice (http://www.bccdc.ca/Health-Info-Site/Documents/COVID_public_guidance/All-sector-work-campsguidance.pdf).

4. Food Premises Regulation prescribes requirements for food preparation and service to workers (<http://www.bclaws.ca/civix/content/complete/statreg/1922970521/08028/reg08028/1987775736/?xsl=/templates/browse.xsl>).

More information about sewerage and food premise requirements and processes can be found here: <https://www.interiorhealth.ca/YourEnvironment/Pages/default.aspx>

Thank you again for this opportunity to provide feedback. Please do not hesitate to reach out to Tanya Osborne, Community Health Facilitator at Tanya.Osborne@interiorhealth.ca or to Cynthia Watson, Environmental Health Officer at Cynthia.Watson@interiorhealth.ca if you require clarification or have questions.

Signature: 

Signed By: Tanya Osborne

Agency: Interior Health

Title: Community Health Facilitator

Date: July 9, 2021

Lauri Feindell

Subject: FW: TUP Referral (Project No. C2021.014-TUP)

From: Moraes, Ryan <Ryan.Moraes@fortisbc.com>
Sent: June 15, 2021 8:00 AM
To: Planning <planning@rdos.bc.ca>
Subject: RE: TUP Referral (Project No. C2021.014-TUP)

Good Morning,

We have no concern with this TUP.

Regards,

Ryan Moraes, P.L.Eng, ASCT | Planning & Design Technologist | FortisBC
1975 Springfield Rd | Kelowna, BC V1Y 7V7
☎ 250-490-2621 📠 778-214-0509 | ✉ ryan.moraes@fortisbc.com