





Envirochem Services Inc. 206 – 267 West Esplanade North Vancouver, BC V7M 1A5 Tel.: 604-986-0233

www.envirochem.com response@envirochem.com

December 4, 2015

South Coast Natural Resource Region
Ministry of Forests, Lands and Natural Resource Operations
200 – 10428 153 Street,
Surrey BC V3R 1E1

To Whom It May Concern,

RE: Crown Land Tenure Application (100149054) and Water Act Section 9 Application (100149643) at West Coast Chip Plant on behalf of Howe Sound Pulp & Paper Company.

Envirochem Services Inc. (Envirochem) was retained by Howe Sound Pulp & Paper Company West Coast Chip Plant (HSPP or the Proponent) to apply for a Crown Land Tenure (Temporary License) in support of the proposed removal of foreshore and in-water dock structures at West Coast Chip Plant, located at 8501 Ontario Street, Vancouver BC. The work will be conducted in and around water (North Arm Fraser River) and therefore a Water Act Section 9 Application has also been completed and submitted (100149643). The foreshore and in-water structures are located at the western portion of the Site along the Fraser River. The structures are no longer in use by the proponent and therefore in fulfillment of original lease conditions, the structures are scheduled for removal.

The proposed scope for removal of the dock structures is presented below. Overall, the following conditions are noted:

- Mid to high local tide conditions will be required for demolition of Structures 3, 4, and 5.
 Proposed start and completion dates will dictate required tidal conditions.
- The proposed structures removal will be carried out by Valley Towing Ltd.
- Works will be conducted within appropriate Fisheries timing windows for the Fraser River and utilizing best management practices / procedures in order minimize any potential impacts to fish or other aquatic life.
- All materials scheduled for disposal will be sent to an approved disposal facility.

The foreshore and in-water dock structures consist of 5 components (structures). It is Envirochem's understanding that the dock structures are comprised of the following materials and that the following methods will be utilized for their removal:

Structure 1: Scow positioning winch shack

- Approximately 11' X 20' one story wood frame steel clad building
- Approximately 12' X 20' X 2' 8" concrete support slab
- 15 untreated support piling

Proposed method of removal:

- Performed from shore with hydraulic excavator
- Building steel cladding is to be separated from the wooden structure and taken to appropriate recycling facility.
- Wood frame is to be demolished and taken to neighbouring recycling facility.
- Concrete foundation is to be demolished with a hoe ram and reinforcing steel separated. Materials are to be removed from site and sent to appropriate recycling depots.
- Untreated support piling could be left in place to provide stability to the river bank.

Structure 2: Shore conveyor support pier

- Based on a previous site visit by Nathan Nottingham, the structure appears to provide stability to the river bank. Therefore, it could be left in place to maintain stability to the river bank.
- If Structure 2 is required to be removed, the proposed method of removal will follow a similar approach as Structure 1, except the creosote timber piling is to be extracted and salvaged for use in future piling projects (if possible).

Structure 3: Steel access walkway

Approximately 3' X 60' steel structure

Proposed method of removal:

- Performed by an 80 ton spud barge mounted derrick crane. The Site will be accessed via the Fraser River.
- The walkway is to be salvaged and transferred to the HSPP Ontario Street facility for future use at their chipping facility.

Structure 4: Scow positioning fair lead platform

- Approximately 8' X 12' steel I-beam platform
- 12 H beam support piling

Proposed method of removal:

- Platform is to be dismantled and taken to an appropriate steel recycling facility
- Piling is to be extracted from river bed and salvaged for use in future piling projects (if possible).



Structure 5: Outboard conveyor support pier

- Approximately 4' X 16' X 4' concrete foundation
- 10 creosote timber support piling

Proposed method of removal:

- Performed by an 80 ton spud barge mounted derrick.
- Concrete foundation to be removed from piling and transferred to shore.
- Concrete to be demolished with a hoe ram and reinforcing steel separated. Materials to be removed from site to the appropriate recycling depot.
- Piling to be extracted from river bed and salvaged for use in future projects (if possible)

Based on the above scope of work, it is not anticipated that unacceptable, permanent or serious harm to the environment, including fish and fish habitat, will be caused as a result of this project. Please contact the undersigned for any questions regarding the applications mentioned above.

Sincerely,

ENVIROCHEM SERVICES INC.

Dylan Denault

Dylan Denault Environmental Scientist

Attachments:

Management_Plan (.pdf)
Fig 1a_General Site Location (.pdf)
Fig 1b_General Site Location (.pdf)
Fig 2a_Site Plan (Plan View) (.pdf)
Fig 2b_Site Plan (.pdf)
Fib 2c_Site Plan (.pdf)



Limitations:

This application and supporting documents were created on behalf of Howe Sound Pulp & Paper Company West Coast Chip Plant in support of acquiring a Crown Land Tenure and Water Act Section 9 Approval for the proposed removal of foreshore and in-water dock structures. The findings, conclusions, and recommendations in this document are based on the expertise and experience of Envirochem personnel and: 1) information available at the time of preparation, 2) data supplied by outside sources, and 3) the assumptions, conditions and qualifications set forth in this document. The possibility remains that unexpected environmental conditions may be encountered at the Project site. Envirochem has relied in good faith on information provided by individuals and third parties noted in this application and accepts no responsibility for any deficiency, misstatements or inaccuracy contained in this document as a result of this information.



Management Plan

Please describe the details of your project to the extent known. Consult the guidance document for further information on regulatory requirements, rational for why the information is required, and how to find required information.

The scope and the timing for response will be provided. If information is requested and not received, it may result in the disallowance of the application.

Information on these topics may be required as part of the application processing and if further detail is necessary that is not part of the application and management plan received, you will be contacted and requested to provide additional information. In some circumstances, the use of a qualified professional to complete the plan may be required.

1.0 Background

1.1 Project Overview

Describe project for which authorization is requested, including construction and/or phased development details:

Howe Sound Pulp & Paper Company is requesting a tenure for the removal of dock structures located on the foreshore of West Coast Chip Plant at 8501 Ontario Street, Vancouver, BC along the North Arm Fraser River. West Coast Chip Plant is used primarily as a wood processing facility. The foreshore structures are located at the western portion of the Site along the Fraser River. The structures are no longer in use by the proponent and therefore in fulfillment of original lease conditions, the structures are scheduled for removal. The structures will be removed via crane onto a flat scow for upland disposal or re-purposing (if possible).

The works are proposed to take place during daylight hours within the applicable Fisheries (DFO) Winter Timing Window for In-Water Works (June 16 - February 28 for the North Arm Fraser River, http://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/bc-s-eng.html#area-28).

Please refer to the attachment document "Cover Letter_Scope of Work" for a detailed scope of work.

1.2 Investigative Work

If any preliminary investigative work has been carried out, with or without an investigative authorization, provide details on work completed, incomplete or on-going from previous term.



Activity	Brief Description of Activity	Status (e.g. Complete, incomplete, ongoing)	Comments / Milestones
None	N/A	N/A	N/A
Add Row	1	1974	

1.3 Confirmation of Safety Plan

Your Project must meet the Occupational Health and Safety (OHS) criteria set out by WorkSafe BC. Does your Project meet these criteria?



5.2.3 First Nations Consultation

Describe any contact you may have had, including the name of the First Nation(s) and representatives contacted.



First nations consultation occurred in 2014 during an application to Port Metro Vancouver for the proposed project. The scope of work presented in this application is the same as the 2014 Port Metro Vancouver application.

Please refer to the attached confirmation email, subject: "2014-10-31 Ltrs to First Nations - Howe Sound Pulp & Paper Demolition - PP-2014-207" sent by Kaisa McCandless, Aboriginal Affairs Coordinator at Port Metro Vancouver for further detail including the First Nations that were notified of the proposed project in 2014

Attached: 2014-10-31 Ltrs to First Nations - Howe Sound Pulp & Paper Demolition - PP-2014-207.pdf



2.0 Location

2.1 Description

Provide a general description of the location of the project:



West Coast Chip Plant is located along the North Arm Fraser River in Vancouver, BC (8501 Ontario Street, Vancouver BC). The facility is used primarily as a wood processing facility. The Site is zoned M-2 Industrial within the City of Vancouver. Adjacent properties along the Fraser River both upstream and downstream of the project location are also zoned Industrial. The proposed project location is away from roads, parks, and residential areas.

2.2 Location Justification

Provide your reasons/justification of the need for this type of project at this location:



The structures are no longer in use by the proponent and therefore in fulfillment of original lease conditions, the structures are scheduled for removal.

2.3 Seasonal Expectations of Use

When will the Project require use of the land? Include information on key works during construction phases as well as operations phase. Please reference reduced risk fish windows as required by DFO:



Project Phase (Construction / Operations)	Brief Description of Activity / Works	Season
Dock Structure Removal	Removal of specified foreshore and in-water structures utilizing a barge mounted Derrick crane.	DFO Winter Timing Window for the Fraser River North Arm
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3.0 Infrastructure and Improvements

3.1 New Facilities and Infrastructure

Detail any new facilities, infrastructure or processes proposed and any ancillary uses. Provide details of planned construction methods and materials, and construction scheduling.

Facility/Infrastructure/Process	Construction Methods/Materials	Construction Schedule
Dock Structure Removal	Please refer to Section 1.1, Project Overview and the attachment document "Cover Letter_Scope of Work"	Please refer to Section 1.1, Project Overview and the attachment document "Cover Letter Plan_Scope of Work"
Add Field		

3.2 Access

Identify existing and proposed roads used for access and their use by season. Include any proposed connections to public or Forest Service Roads; traffic information including volume of traffic during construction/operation and phase or season that the traffic is expected:

Roadway/Proposed	0,000	Existing Road	Road Permittee	Traffic Volume	/olume	Mitigation of Traffic
Connection	Existing/Froposed	Classification	Use Agreements	Construction Phase	Operations Phase	Effects
Site access may occur via the foreshore property held by the proponent. Equipment used for the removal of the specified structures will access the Site via the Fraser River.	N/A	N/A	N/A	N/A	N/A	N/A
Add Field						

3.3 Utility Requirements and Sources

Describe utility requirements and sources, include agreements in place or underway allowing access to utilities.

None.

3.4 Water Supply

Identify water requirements for construction and operation phases (e.g. surface water and/or groundwater), including sources, location, volume and a general description of infrastructure planned to meet water supply requirements, include any agreements outside of Water Act Authorizations identified above (Section I, Authorizations, Permits or Approvals), such as Municipal water supply.

Project Phase (Construction/ Operation)	Water Requirement (e.g. Surface water or ground water, etc)	Source/location	Volume	Infrastructure Description	Agreements
None	N/A	N/A	N/A	N/A	N/A
Add Field					

3.5 Waste Collection Treatment and Disposal

Identify water requirements for construction and operation phases (e.g. surface water and/or groundwater), including:

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)	Agreements	N/A	
	Infrastructure Description	N/A	
	Volume	N/A	
	Source/location	N/A	
	Water Requirement (e.g. Surface water or ground water, etc)	N/A	
Control of the Contro	Project Phase (Construction/ Operation)	None	Add Field



4.0 Environmental

Describe any significant impacts and proposed mitigation for the following environmental classes:

4.1 Land Impacts

4.1.1 Vegetation Removal

Is any timber removal required?

C Yes

€ No

Are any areas of vegetation to be cleared, outside of timber removal?

C Yes

No

4.1.2 Soil Disturbance

Will there be any areas of soil disturbance, including clearing, grubbing, excavation and levelling?

C Yes

No

Is the area to be excavated a Brownfield site or has the potential to be contaminated?

C Yes

€ No

Is there potential for disturbance of archaeological, paleontological fossils or historical artifacts?

C Yes

No

4.1.3 Riparian Encroachment

Will any works be completed within or adjacent to the riparian zone of any water body?

Yes

CNo



4.1.4 Pesticides and Herbicides

Will there be any use of pesticides or herbicides during construction, operations and/or maintenance?

C Yes

€ No

4.1.5 Visual Impacts

Will there be any adverse effects of the projects, and any potential adverse effects on sight lines to the project area from surrounding areas likely to be used for scenic viewing by residents or other users?

C Yes

@ No



4.1.6 Archaeological Sites

Are there any known or high potential (Arch Procedure) archaeological sites within the project area?

C Yes

€ No

Have you conducted an AIA or engaged an archaeologist to assist with your investigations?

C Yes

No
 No
 No

4.1.7 Construction Methods and Materials

Identify the types of construction materials, the methods used, their impacts, and any mitigations:

Construction Material/Method	Impacts	Mitigations	
Dock Structure Removal	Please refer to Section 1.1, Project Overview and the attachment document "Cover Letter_Scope of Work"	Please refer to Section 1.1, Project Overview and the attachment document "Cover Letter_Scope of Work"	

4.2 Atmospheric Impacts

4.2.1 Sound, Odor, Gas or Fuel Emissions

Will the project construction or operation cause any of the following to disturb wildlife or nearby residents:

(Best management practices for sound)

Sound? (Yes No No Odor? (Yes No

Fuel Emissions? (Yes 6 No

Gas? (Yes

4.3 Water or Land Covered by Water Impacts

@ No

4.3.1 Drainage Effects

Will the project result in changes to land drainage?

C Yes

No

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Will the project re-	sult in changes to public access?
	No No
4.3.3 Flood Pote	ntial
Will the project re	sult in a potential for flooding?
	No No
4.4 Fish and Wild	life Habitat Impacts
4.4.1 Disturbanc	e to Wildlife and Wildlife Habitat
Will the project res	sult in adverse effects to wildlife or wildlife habitat?
C Yes	No No
Will the project (co	onstruction or operations phase) occur in and around streams, lakes, estuarine or marine environments
(● Yes	C No
Is the project (con	struction or operations phase) likely to increase erosion or sedimentation?
C Yes	No No
Will the project (co	onstruction or operations phase) require water diversion?
	No No
Will the project thr Species At Risk Act	reaten or endanger species at risk in the area?
C Yes	No No

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5.0 Socio-Community

5.1 Land Use

Describe the current community setting on or near the project area, including the location of non-aboriginal and aboriginal communities or known use areas.

The proposed project is located in South Vancouver in a heavily industrialized area of the North arm of the Fraser River. Historical use in this area has been industrial.

5.1.1 Land Management Plans and Regional Growth Strategies

Are there any land and resource management plans, coastal plans, provincial, regional growth strategies or local government plans with zoning, or management policies or use restrictions in place that could limit or preclude your proposed use of the land? (Please refer to the Union of BC Municipalities (UBCM), and check the websites of the municipality, regional district or other organization with jurisdiction including your project area.)

5.2 Socio-Community Conditions

5.2.1 Adjacent Users or Communities

Is the project likely to restrict public access, or the ability, or the ability of adjacent land owners or tenure holder to access their property or tenures?

5.2.2 Existing Services

Provide a description any increased demand on fire protection and other health facilities and emergency services arising from your Project, including proposed management or mitigation measures.

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No increased demand on fire protection and other health facilities and emergency services are anticipated.	

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