



3 June 2015

**Fraser Surrey Docks Limited Partnership**  
**11060 Elevator Road**  
**Surrey, BC, Canada**  
**V3V 2R7**

**Attention: Jorgen Franke P.Eng., Director, Engineering & Terminal Development**

**Re: Summary of changes to Environmental Management Plan, June 2013**

**Dear Sir:**

This letter is provided to confirm our review of the proposed amendments to the conditionally permitted Direct Transfer Coal Facility (DTCF) at Fraser Surrey Docks (FSD). Specifically how the proposed amendments may affect or relate to the latest Construction Environmental Management Plan (CEMP), part of the Preliminary Environmental Management Plan for Construction and Operations (Triton, June 2013). To summarize, the proposed project amendments include but are not necessarily limited to:

- Relocating the rail loop near the proposed dumper and front gate.
- Variations in the location of some excavations.
- Variations in the type of infrastructure used to transfer coal from trains to vessels.
- Removal of Shed Four (4)

From an environmental management perspective the proposed amendments have changed the project footprint resulting in a reduced impact on local drainages. Primarily, the proposed amendment will no longer impact the Class A watercourse, although impacts to Class C watercourses have increased by a similar amount, and the planting plans to offset project impacts remain unchanged. However, it is important to note the proposed amendments will not change the proposed construction techniques, or mitigation measures associated with construction activities. Therefore, the preliminary CEMP prepared for the project, and included as part of the Environmental Impact Assessment (SNC Lavalin, 2013), still provides a suitable framework for mitigating impacts from construction activities.

Updates to the June 2013 CEMP and OEMP (Operational Environmental Management Plan) are still recommended to ensure the most recent applicable information from current legislation, guidelines, and best management practices (BMPs) are incorporated and up to date. In addition, some sections may need to be expanded or even added to clarify roles and responsibilities, and ensure consistency with other background assessments, and documents.



We understand it is FSD's intent to update the June 2013 CEMP and make it available prior to construction, and as well to update the OEMP and make it available prior to commencing operations. In a broader context the construction methods and mitigation measures have not changed substantially, and these changes are not specifically related to the proposed project amendments.

## CLOSURE

We trust the above information meets your requirements for a comparison of changes between the preliminary CEMP prepared as part of the June 2013 EMP and the proposed project amendments. However, should you have any questions please do not hesitate to contact the undersigned.

Sincerely

**Soleil Environmental Consultants Ltd.**

**Tom A. Watson, Ph.D., R.P.Bio. (BC), P. Biol. (AB)**  
**Senior Environmental Scientist**  
**President**

**POLARIS Environmental Consultants Ltd.**

**Peter Frederiksen CPESC, Dip.T. (RNS)**  
**Senior Environmental Specialist**

## REFERENCES

Triton Environmental Consultants Ltd., 2013. Fraser Surrey Docks Temporary Coal offload facility, Preliminary Environmental Management Plan for Construction and operations. Submitted to Port Metro Vancouver, Nov 18, 2013, Appendix 6 of the Environmental Impact Assessment. Prepared for Fraser Surrey Docks, by SNC Lavalin Inc.

SNC Lavalin Inc. 2013. Environmental Impact Assessment for the Direct Transfer Coal Facility. Prepared for Fraser Surrey Docks, and submitted to. Internal Ref: 614836. Submitted to Port Metro Vancouver, Nov 18, 2013.