

November 4, 2022
PGL File: 6561-01.03

Via E-mail: john.wilbeck@greystar.com

UH Property Owner Limited Partnership
1002 Wharf Street
Victoria, BC
V8W 1T4

**RE: PERFORMANCE VERIFICATION PLAN – 3956 SHELBOURNE STREET, SAANICH, BC
ENV SITE: 6815**

PGL Environmental Consultants (PGL) has prepared this Performance Verification Plan (PVP) for risk management measures to be maintained at a metes-and-bounds portion of the University Heights Shopping Centre at 3956 Shelbourne Street, Saanich, BC (the Site).

Table A: Site Identification Information

Civic Address	3956 Shelbourne Street, Saanich, BC
Property Owner	University Heights Shopping Centre Ltd.
Common Name	University Heights Shopping Centre
Legal Description	Metes and Bounds Area of the Parcel. Commencing at point 32.25 metres at a bearing of 147° 20' 24" from the Northwest corner of Lot A, Sections 56 and 57, Victoria District Plan EPP84722; Thence easterly 16.10 metres at a bearing of 90° 44' 27"; Thence southerly 7.70 metres at a bearing of 180° 44' 27"; Thence easterly 48.15 metres at a bearing of 90° 44' 27"; Thence southerly 36.08 metres at a bearing of 181° 02' 21"; Thence easterly 6.24 metres at a bearing of 90° 55' 23"; Thence southerly 101.18 metres at a bearing of 180° 53' 22" Thence westerly 70.50 metres at a bearing of 270° 55' 23"; Thence northerly 144.75 metres, more or less, to the point of commencement.
PID	030-547-342
Latitude*	48°28'15.02"
Longitude*	123°20'2.51"
Current Zoning	C-3UH: Shopping Centre University Heights Zone. Uses permitted may include the following: apartment, assembly, congregate housing, daycare, fast food restaurant, home occupation, liquor retail store, medical services, non-medical cannabis retail store, office, personal, service, research, restaurant, or retail.
Proposed Site Use	Commercial - retail
Property Area	9,566m ²
ENV Site No.	6815

* Source: Google Earth

The rectangular metes-and-bounds portion of the property (i.e., the Site) is, and continues to be, leased and occupied by Home Depot. Home Depot plans to extend its existing retail and warehouse operations within the Site. The entirety of the Site is paved or covered with the building. Home Depot will continue its operations for the foreseeable future (20+ years).

This PVP is intended to support the current and ongoing Site use.

Previous environmental investigations identified soil contamination exceeding standards to protect human health and ecological health (Table B).

More information is provided in Thurber's investigation and PGL's screening-level risk assessment report:

- *Supplemental Detailed Site Investigation, University Heights Shopping Centre, 3956 Shelbourne Street, Saanich, British Columbia*, prepared by Thurber Engineering Ltd. dated September 2022; and
- *Screening-Level Assessment, 3956 Shelbourne Street, Saanich, BC*, prepared by PGL Environmental Ltd., dated September 2022.

Table B: Summary of Contamination

COC	Medium	Maximum Measured Concentration	Extent of Contamination	
			Area (m ²)	Depth Range (m)
EPH _{C19-32} (HEPH _S)	Soil	19,000	630	1.5 – 2.3
VPH _S	Soil	250	630	1.5 – 2.3

Notes: COC – contaminant of concern

EPH_{C19-32} is assumed to be equivalent to HEPH; EPH_{C19-32} is not regulated in soil

VPH – volatile petroleum hydrocarbons

Currently, a barrier is present and will continue to be present under the future scenario.

NECESSARY RISK CONTROLS

The risk assessment identified the following risk controls that are to be maintained to prevent unacceptable risk to onsite receptors:

- The barrier is required to prevent potential human and ecological exposure to deeper contaminated soil.

Preventing direct contact with deeper soil contamination using a barrier (1m of soil cap or pavement) is an engineering control as defined by BC Ministry of Environment and Climate Change Strategy (ENV) Guidance¹, and makes the Site Type 2. Maintaining the risk control is necessary to meet risk-based standards under current and future uses. Type 2 sites require a PVP.

ACTIONS REQUIRED TO IMPLEMENT RISK CONTROLS

Risk controls are engineering works that need to be implemented or maintained to ensure compliance. The owner of the property will maintain this PVP on file, and comply with the conditions of the Certificate of Compliance. The responsible persons must provide notification to the Site owner/operator/strata council that a cap must be maintained in accordance with this PVP.

¹ < <https://www2.gov.bc.ca/gov/content/environment/air-land-water/site-remediation/guidance-resources/performance-verification-plans>>

IMMEDIATE RISK OF EXPOSURE TO HUMANS, AND TERRESTRIAL NON-HUMAN RECEPTORS TO CONTAMINANTS IF THERE IS A SUDDEN FAILURE OF RISK CONTROLS

There is low to negligible likelihood of failure of the cap system. There is no immediate risk to any receptors if risk controls are not maintained (or in the event of a system failure):

- There is currently a 1m soil cap, and/or surface pavement; and
- The area of contamination is absent any vegetation, is small in area/size, and therefore is unlikely to be suitable habitat.

MAINTENANCE ACTIONS

No maintenance is required for this PVP.

REPORTING TO ENV

Regular reporting to the ENV is not required because:

- There is a low risk that the risk control will not remain operational; and
- There is no immediate risk to human or environmental health if risk conditions are not maintained (or in the event of a system failure).

If requested by the ENV Director, the responsible persons must provide a signed statement indicating whether the principal risk controls have been and continue to be met. This may include providing a signed statement by an Approved Professional.

If through unforeseen events, risk controls are not being met, the Director must be notified promptly by the persons responsible for the Site. The following information must be submitted to the Director with the notification, or as soon as practicable thereafter:

- The period over which institutional and engineering controls did not meet the requirements of Schedule B;
- The nature of the excursions;
- The temporary or permanent corrective measures implemented or to be implemented;
- An implementation schedule; and
- Supporting documentation.

RESPONSIBLE PERSONS

As of the creation of this PVP, the entities responsible for maintaining the risk controls at the Site are:

UH Property Owner Limited Partnership
1002 Wharf Street
Victoria, BC
V8W 1T4
E-mail: john.wilbeck@greystar.com

STATEMENT OF LIMITATIONS AND CONDITIONS FOR REPORT

Complete Report

All documents, records, data and files, whether electronic or otherwise, generated as part of this assignment are a part of the Report, which is of a summary nature and is not intended to stand alone without reference to the instructions given to PGL by the Client, communications between PGL and the Client, and any other reports, proposals or documents prepared by PGL for the Client relative to the specific site described herein, all of which together constitute the Report.

In order to properly understand the suggestions, recommendations and opinions expressed herein, reference must be made to the whole of the Report. **PGL is not responsible for use by any part of portions of the Report without reference to the whole report.**

Basis of Report

The Report has been prepared for the specific site and purposes that are set out in the contract between PGL and the Client. The findings, recommendations, suggestions, or opinions expressed in the Report are only applicable to the site and purposes in relation to which the Report is expressly provided, and then only to the extent that there has been no material alteration to or variation from the information provided or available to PGL.

Use of the Report

The information and opinions expressed in the Report, or any document forming part of the Report, are for the sole benefit of the Client. No other party may use or rely upon the Report or any portion thereof without PGL's written consent, and such use shall be on terms and conditions as PGL may expressly approve. Ownership in and copyright for the contents of the Report belong to PGL. Any use which a third party makes of the Report, is the sole responsibility of such third party. **PGL accepts no responsibility whatsoever for damages suffered by any third party resulting from use of the Report.**

CLOSING

We trust that this meets your needs. If you have any questions or require clarification, please contact Michael Shum or Ingo Lambrecht at 604-895-7656 and 250-220-2318, respectively.

PGL ENVIRONMENTAL CONSULTANTS

Per:



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MGS/IPL/MLA/mtl/neg
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