



VIA EMAIL : goran@trilliumprojects.com

Victoria File: 26250-20/26355/ 25670/
22849/ 25786/ 27610/ 26356
Site ID: 26355/ 25670/ 22849/
25786/ 27610/ 26356

December 7, 2023

Goran Arevski
3839 Commercial Street Holdings Ltd.
200 – 1195 West Broadway
Vancouver, BC V6H 3X5

Dear Goran Arevski:

**Re: Approval in Principle – 3839, 3869 & 3871 Commercial Street, 1783 East
22nd Avenue, Portion of City of Vancouver Laneway, and Portion of 3795
Commercial Street, Vancouver, B.C.**

Please find enclosed an Approval in Principle respecting the contaminated site referenced above.

In addition to the conditions set out in Schedule B of the Approval in Principle, please be advised of the following:

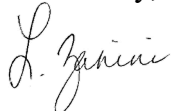
1. Information about the site will be included in the Site Registry established under the *Environmental Management Act*.
2. The provisions of this Approval in Principle are without prejudice to the right of the Director to make orders or impose requirements as the Director may deem necessary in accordance with applicable laws. Nothing in this Approval in Principle will restrict or impair the Director's powers in this regard.
3. A qualified environmental consultant should be available to identify, characterize and appropriately manage:
 - (a) any environmental media that may be contaminated, or
 - (b) removal of soil under the provisions of Part 8 of the Contaminated Sites Regulation and may be encountered during any future work at the site.

4. This Approval in Principle does not authorize entry upon, crossing over, or use for any purpose of private or Crown lands or works, unless and except as authorized by the owner of such lands or works. The responsibility for obtaining such authority rests with the persons undertaking remediation. It is also the responsibility of those persons to ensure that all activities conducted under this Approval in Principle are carried out with due regard to the rights of third parties and comply with other applicable legislation that may be in force.
5. Additional permits and approvals may be required before remediation begins.
6. All site materials (e.g., excavated soil, replaced soil, groundwater from dewatering, pumping, well development etc.) must be characterized and managed in accordance with applicable legislation and ministry guidance.
7. Groundwater wells that are no longer required must be properly decommissioned in accordance with the *Water Sustainability Act's* Groundwater Protection Regulation.
8. Please be advised that there are inherent health and safety risks associated with remediation activities at contaminated sites. Development of site-specific work procedures in accordance with WorkSafeBC regulations is warranted. Please direct related questions to the WorkSafeBC office at 604-276-3100 (Lower Mainland only) or 1-888-621-7233 (toll free in B.C.).
9. Any substantial modifications to the approved remediation plan, including substantial changes to the remediation schedule, or changes in land use, must be promptly identified by written submission to the Director.
10. If an application for a Certificate of Compliance is to be submitted for the site, the confirmation of remediation report accompanying the application must demonstrate compliance with the remediation standards and criteria in force at the time the application for the Certificate is made, which may differ from the remediation standards and criteria in force at the time of issuance of this Approval in Principle.

Issuance of this Approval in Principle is a decision that may be appealed under Part 8 of the *Environmental Management Act*.

If you require clarification of any aspect of this Approval in Principle, please contact the undersigned at Site@gov.bc.ca (toll free via Enquiry BC at 1-800-663-7867).

Yours truly,



Lavinia Zanini, P.Geol.
Senior Contaminated Sites Officer

Enclosure

cc: City of Vancouver
(BY EMAIL) Contaminated.Sites@vancouver.ca

Casador Developments Inc., Mortgage over 3839 Commercial Street
(BY EMAIL) mohamud.karim@gmail.com

Mega International Commercial Bank Co. Ltd., Mortgage over 3869 Commercial Street
(BY EMAIL) icbcvan@megaicbc.com

Clinton Cuddington, Measured BT-01 Holdings Inc., Owner of 1783 East 22nd Street &
3871 Commercial Street, Vancouver
(BY EMAIL) ccuddington@measured.ca

Steeve Seewald, Owner of 3869 Commercial Street, Vancouver
(BY EMAIL) steven@alaraenvironmental.com

Randy Lum, 1189891 B.C. Ltd., Owner of 3975 Commercial Street
(BY EMAIL) mightyatom@shaw.ca

Jeff Taylor, Approved Professional, Active Earth Engineering Ltd.
(BY EMAIL) jeff.taylor@activeearth.ca

Scott Steer, Approved Professional, Steer Environmental Associates
(BY EMAIL) scott.steer@steerenvironmental.com

Anna Popova, CSAP Society
(BY EMAIL) apopova@csapsociety.bc.ca

Client Information Officer, ENV, Victoria
(BY EMAIL) csp_cio@Victoria1.gov.bc.ca



APPROVAL IN PRINCIPLE
(Pursuant to Section 53 of the *Environmental Management Act*)

THIS IS TO CERTIFY that the remediation plan described herein submitted by 3839 Commercial Street Holdings Ltd. for the contaminated site identified in Schedule A of this document has been approved.

When implemented, the remediation plan must be implemented in accordance with the requirements and conditions specified in Schedule B.

The substances for which remediation will be conducted and for which this Approval in Principle is valid are specified in Schedule C.

I have issued this Approval in Principle based on a review of the documents listed in Schedule D. I, however, make no representation or warranty as to the accuracy or completeness of that information.

A Director may rescind this Approval in Principle if conditions imposed in the Approval in Principle are not complied with or any fees payable under Part 4 of the Act or regulations are outstanding.

This Approval in Principle should not be construed as an assurance that there are no hazards present at the site.

December 6, 2023
Date Issued


Lavinia Zanini
For Director, *Environmental Management Act*

Schedule A

The site covered by this Approval in Principle is located at 3839, 3869 & 3871 Commercial Street, 1783 East 22nd Avenue, Portion of City of Vancouver Laneway and Portion of 3795 Commercial Street, Vancouver, British Columbia which is more particularly known and described as:

Lot 60 District Lot 744 Plan 5111
PID: 011-238-666
3839 Commercial Street, Vancouver, BC

Lot 61 District Lot 744 Plan 5111
PID: 011-238-682
3839 Commercial Street, Vancouver, BC

Lot 62 District Lot 744 Plan 5111
PID: 011-238-721
3839 Commercial Street, Vancouver, BC

The North 33 Feet of Lot B (Reference Plan 1397) Block A District Lot 744 Plan 4369
PID: 011-587-466
3869 Commercial Street, Vancouver, BC

Lot 2 of Lot B Block A District Lot 744 Plan 7250
PID: 010-681-752
3871 Commercial Street, Vancouver, BC

Lot 1 of Lot B Block A District Lot 744 Plan 7250
PID: 009-961-224
1783 East 22nd Avenue, Vancouver, BC

Two portions of land situated in the New Westminster District, in the City of Vancouver, in the Province of British Columbia, one part of land lying adjacent to:

Lot 1 and Lot 2, of said Plan 7250, in District Lot numbered 744, in the Group numbered 1, in the New Westminster District, in the City of Vancouver, in the Province of British Columbia, the said Plan registered on the 18th day of May, 1954 and of record in the Land Title Office at New Westminister, British Columbia;

The North 33 Feet of Lot B of said Reference Plan 1397, in the said Block A, in District

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Lot numbered 744, in the Group numbered 1, in the New Westminster District, in the City of Vancouver, in the Province of British Columbia, the said Plan dated on the 4th day of January, 1912 and of record in the Land Title Office at New Westminister, British Columbia, and

adjacent to Lot 60, Lot 61 and Lot 62, of said Plan 5111, in District Lot numbered 744, in the Group numbered 1, in the New Westminister District, in the City of Vancouver, in the Province of British Columbia, the said Plan registered on the 15th day of February 1922 and of record in the Land Title Office at New Westminister, British Columbia,

and second part of land lying on Lot 1, of said Plan EPP30331, in District Lot numbered 744, in the Group numbered 1, in the New Westminister District, in the City of Vancouver, in the Province of British Columbia, the said Plan registered on the 7th day of January, 2004 and of record in the Land Title Office at New Westminister, British Columbia, which two portions may be more particularly described as follows:

First portion:

Commencing at the southwest corner of said Lot 1, of said Plan 7250,
thence at a bearing of 0 degrees and 0 minutes and 0 seconds more or less,
along the western boundary of said Lot 1,
a distance of 10 metres and 55 centimetres more or less,
to the northwest corner of said Lot 1;
thence at a bearing of 0 degrees and 0 minutes and 0 seconds more or less,
along the western boundary of said Lot 2,
a distance of 9 metres and 84 centimetres more or less;
to the northwest corner of said Lot 2;
thence at a bearing of 0 degrees and 0 minutes and 0 seconds more or less,
along the western boundary of said Lot North 33 feet,
a distance of 10 metres and 6 centimetres more or less;
to the northwest corner of said Lot North 33 feet;
thence at a bearing of 0 degrees and 0 minutes and 0 seconds more or less,
along the western boundary of said Lot 62,
a distance of 9 metres and 94 centimetres more or less;
to the northwest corner of said Lot 62;
thence at a bearing of 0 degrees and 0 minutes and 0 seconds more or less,
along the western boundary of said Lot 61,
a distance of 9 metres and 94 centimetres more or less;
to the northwest corner of said Lot 61;
thence at a bearing of 0 degrees and 0 minutes and 0 seconds more or less,
along the western boundary of said Lot 60,

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a distance of 4 metres and 67 centimetres more or less;
thence at a bearing of 270 degrees and 0 minutes and 0 seconds more or less,
a distance of 4 metres and 80 centimetres more or less;
thence at a bearing of 180 degrees and 0 minutes and 0 seconds more or less,
a distance of 55 metres and 0 centimetres more or less;
thence at a bearing of 90 degrees and 0 minutes and 0 seconds more or less,
a distance of 4 metres and 80 centimetres more or less,
to the point of commencement;
the said first portion containing by admeasurement a total area of 264.0 square metres,
more or less.

all the said bearings being astronomic derived from said Plan 5111;

Second portion:

Commencing at a point on the southern boundary of said Lot 1,
Said point being at a bearing of 91 degrees and 25 minutes and 48 seconds more or less,
a distance of 2 metres and 31 centimetres more or less, from the southwest corner of said
Lot 1, of said Plan EPP30331,
thence at a bearing of 1 degrees and 25 minutes and 48 seconds more or less,
a distance of 7 metres and 40 centimetres more or less;
thence at a bearing of 91 degrees and 25 minutes and 48 seconds more or less,
a distance of 17 metres and 0 centimetres more or less;
thence at a bearing of 181 degrees and 25 minutes and 48 seconds more or less,
a distance of 7 metres and 40 centimetres more or less,
to a point along the southern boundary of said Lot 1,
thence at a bearing of 271 degrees and 25 minutes and 48 seconds more or less,
along the southern boundary of said Lot 1,
a distance of 17 metres and 00 centimetres more or less,
to the point of commencement;
the said second portion containing by admeasurement a total area of 125.8 square metres,
more or less.

all the said bearings being grid bearings within Integrated Survey Area numbered 31 and being
of North American Datum numbered 1983.

The site contains part of a legal parcel depicted in a legal sketch plan prepared by Bennett Land
Surveying Ltd., B.C. Land Surveyor on May 5, 2023.

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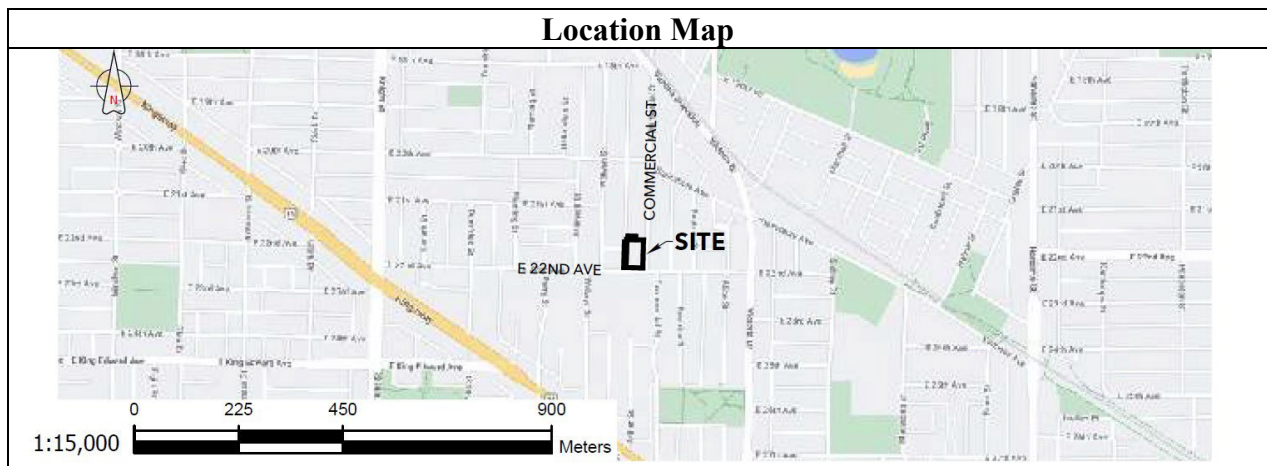
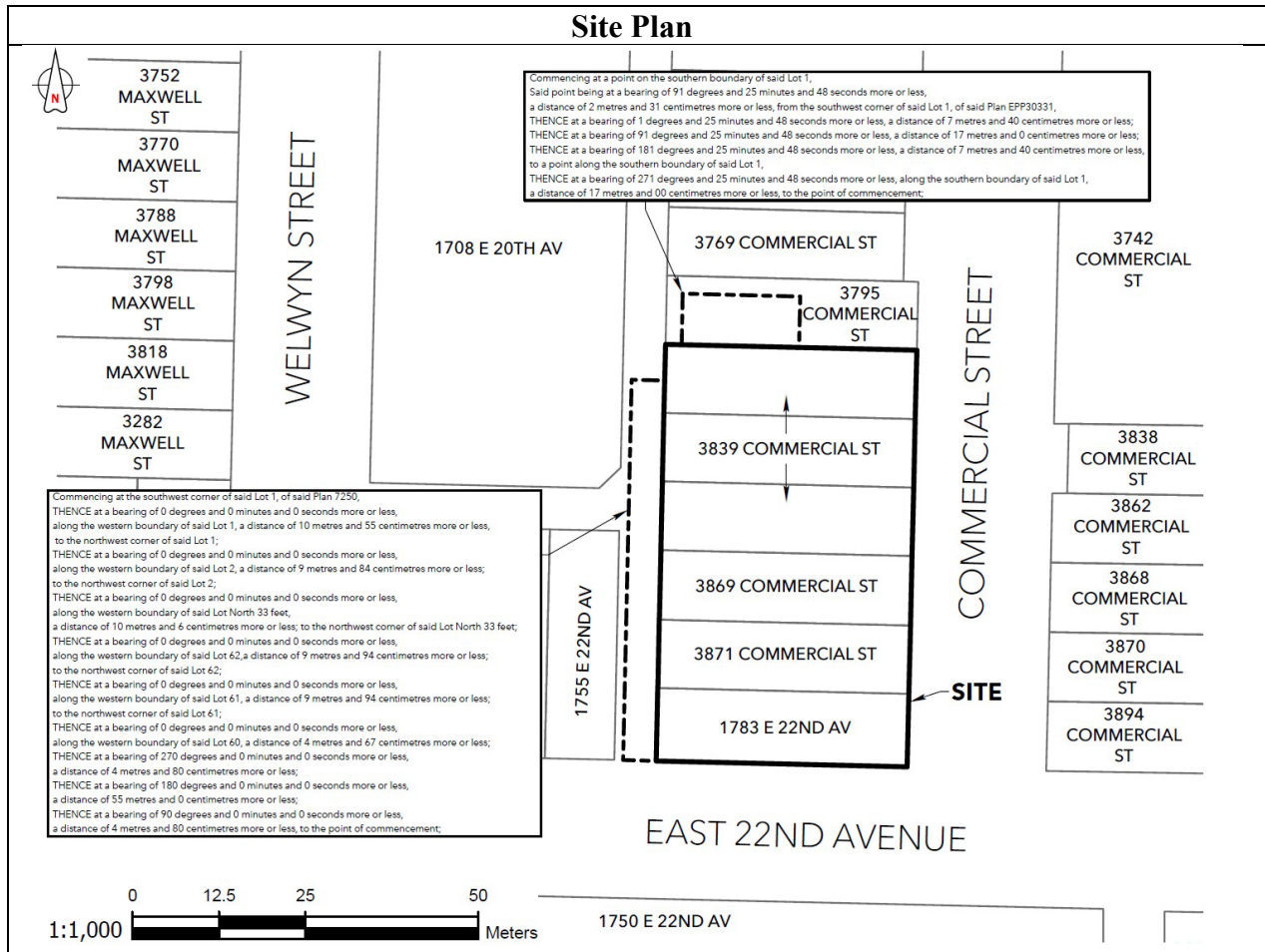

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The approximate centre of the site using the NAD (North American Datum) 1983 convention is:

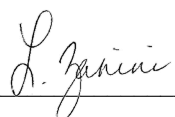
Latitude: 49° 15' 03.0"
Longitude: 123° 04' 06.5"

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Schedule B

Requirements and Conditions

1. Remediation, including monitoring, inspections and maintenance of any works, must be undertaken by the responsible person in the manner and schedule specified in the plan listed in Schedule D or as specified in a modification of the plan approved by the Director.
2. Any substantial modifications to the approved remediation plan, including substantial changes to the remediation schedule, conditions or circumstances described in the risk assessment upon which the remediation plan is based, or changes in land, vapour, water, or sediment use, must be promptly identified in a written submission by the responsible person to the Director. An application for an amendment or new Approval in Principle may be necessary.
3. Up-to-date records of monitoring, inspections and maintenance of any works must be maintained by the responsible person or their agent. The records must be available for inspection by the Director.
4. Remediation must be completed within five years of the date of issuance of this Approval in Principle.
5. Remediation must be confirmed in accordance with applicable legislation and ministry guidance. Within 90 days of completing remediation, a report summarizing confirmation of remediation must be prepared in accordance with section 49 (2) of the Contaminated Sites Regulation and submitted to the Director.
6. A statement signed by an Approved Professional must be submitted to the Director annually within 90 days of the anniversary of the date of issuance of this Approval in Principle. The statement must include the following:
 - (a) A summary of remedial activities undertaken during the reporting period; and
 - (b) An assessment comparing remediation progress to the actions and schedule set out in the plans referenced above. Refer to Condition 3 above if remedial progress differs substantially from the schedule set out in the approved plan.
7. If requested by the Director, a report signed by an Approved Professional must be submitted for review to the Director and must include the following:
 - (a) A summary of remedial activities undertaken to date;

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For Director, *Environmental Management Act*

- (b) An assessment comparing remediation progress to the actions and schedule set out in the plans referenced above. Refer to Condition 3 above if remedial progress differs substantially from the schedule set out in the approved plan; and
 - (c) Supporting documentation (e.g., analytical reports, records of inspection, maintenance of treatment works, etc.).
8. The documents listed in Schedule D indicate that vapour attenuation factors were applied to meet a Contaminated Sites Regulation numerical standards at the site. These vapour attenuation factors were selected based on assumptions about the structures, locations and depths of buildings existing or expected at the site. These assumptions include the following:
- (a) *“The redevelopment plans may include commercial use at grade, with the potential for underground parking at one or more of the parcels comprising the Site.”*

Any inconsistencies that arise between the structures, locations and depths of proposed or constructed buildings at the site and the range of structures, locations and depths of buildings assumed in the selection of vapour attenuation factors in the documents listed in Schedule D must be promptly identified by the responsible person in a written submission to the Director. An application for an amendment or new Approval in Principle may be necessary.

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For Director, *Environmental Management Act*

Schedule C

Substances and Uses

3839 Commercial Street (PID: 011-238-66, 011-238-682, 011-238-721)

Substances to be remediated in soil for commercial land soil use:

To meet numerical remediation standards:

tetrachloroethylene	127-18-4
VPHs	N/A

Substances to be remediated in water, irrespective of water use:

To meet risk-based remediation standards:

tetrachloroethylene	127-18-4
VHw6-10	N/A

3869 Commercial Street (PID: 011-587-466)

Substances to be remediated in soil for commercial land soil use:

To meet risk-based remediation standards:

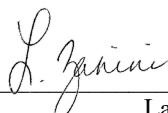
zinc	7440-66-6
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Substances to be remediated in water, irrespective of water use:

To meet risk-based remediation standards:

tetrachloroethylene	127-18-4
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For Director, Environmental Management Act

3871 Commercial Street (PID: 010-681-752)

Substances to be remediated in soil for commercial land soil use:

To meet numerical remediation standards:

LEPHs	N/A
tetrachloroethylene	127-18-4
VPHs	N/A

Substances to be remediated in water, irrespective of water use:

To meet risk-based remediation standards:

tetrachloroethylene	127-18-4
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1783 East 22nd Avenue (PID: 009-961-224)

Substances to be remediated in soil for commercial land soil use:

To meet numerical remediation standards:

LEPHs	N/A
tetrachloroethylene	127-18-4
VPHs	N/A

Substances to be remediated in water, irrespective of water use:

To meet risk-based remediation standards:

tetrachloroethylene	127-18-4
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Substances to be remediated in vapour for parkade vapour use:

To meet numerical remediation standards:

tetrachloroethylene	127-18-4
trichloroethylene	79-01-6
VPHv	N/A

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For Director, *Environmental Management Act*

Portion of City of Vancouver Laneway

Substances to be remediated in water, irrespective of water use:

To meet risk-based remediation standards:

tetrachloroethylene 127-18-4

Portion of 3795 Commercial Street

Substances to be remediated in water, irrespective of water use:

To meet risk-based remediation standards:

tetrachloroethylene 127-18-4
VHw6-10 N/A

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For Director, *Environmental Management Act*

Schedule D

Documents

Summary of Site Condition, 3839, 3869 & 3871 Commercial Street and 1783 East 22nd Avenue, Portion of City of Vancouver Laneway and Portion of 3975 Commercial Street, Vancouver, BC, prepared by Active Earth Engineering Ltd., dated September 2023;

Off-Site Communication Records, prepared by Active Earth Engineering Ltd., dated October 2023;

Remediation Plan, 3795, 3839, 3869, 3871 Commercial Street and 1783 East 22nd Avenue, Vancouver, BC, prepared by Active Earth Engineering Ltd., dated September 2023;

Human Health and Ecological Risk Assessment, 3795, 3839, 3869 3871 Commercial Street & 1783 East 22nd Avenue, Vancouver, BC, prepared by Steer Environmental Associates Ltd., dated September 2023;

Stage 1 Preliminary Site Investigation, Detailed Site Investigation and Confirmation of Remediation, 3795, 3839, 3869, and 3871 Commercial Street and 1783 East 22nd Avenue, Vancouver, BC, prepared by Active Earth Engineering Ltd., dated September 2023;

Updated Stage 1 & 2 PSI, DSI at 3839 Commercial Street, Vancouver, BC, prepared by WSP Canada Inc., dated April 2022;

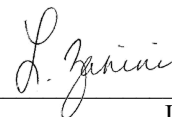
Stage 1 Preliminary Site Investigation, 3839 Commercial Street, Vancouver, BC, prepared by Active Earth Engineering Ltd., dated April 2021;

Borehole Logs, Analytical Tables, Figures for Detailed Site Investigation at 1783 East 22nd Avenue, Vancouver, BC, prepared by PGL Environmental Consultants, dated June 2020;

Stage 2 Preliminary Site Investigation, 3839 Commercial Street, Vancouver, BC, prepared by Levelton Consultants Ltd., dated December 2005.

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For Director, *Environmental Management Act*