

May 13, 2016
PGL File: 4434-01.03

Via E-mail: cmcivor@telus.net

Pemberton Music Festival LP
c/o Cam Mclvor
235 Park Ave. South – 9th Floor
New York, NY
10003

Attention: Cam Mclvor

RE: RESPONSE TO SQUAMISH LILLOOET REGIONAL DISTRICT COMMENTS

Pemberton Festival LP retained PGL Environmental Consultants (PGL) to respond to an information request from the Squamish-Lillooet Regional District's April 29, 2016 letter regarding the McLeod/Phare Temporary Use Permit Application. An application for a Non-Farm Use Application was previously submitted to temporarily use a portion of the McLeod and Phare properties to host a portion of the festival activities, including parking on the Ayer/McLeod property and staff tent camping on the Phare property.

PGL's response is limited to the following sections of the information request:

- #3 – Well Water Testing;
- #4 – Soil Testing and Protection; and
- #5 – Erosion and Sediment Control.

Detailed responses are provided below.

3. WELL WATER TESTING

'Drinking well water testing for the 6 properties adjoining the McLeod property, to determine a baseline to address the potential issues of well contamination. Water should be tested based on the Guidelines for Canadian Drinking Water quality. The SLRD will require this testing to be submitted to the SLRD office no later than June 3, 2016. Post-PMF event testing on these wells must be done within 48 hours after the vehicles have left the parking area.'

Based on the short duration of the proposed temporary use of the McLeod property for festival parking, PGL does not recommend testing of offsite drinking water wells. PGL does not consider temporary parking of non-commercial vehicles to be an activity of environmental concern. In the absence of onsite bulk fuel or chemical storage or distribution, PGL has not identified any activities which would pose a significant risk to the underlying aquifer or offsite drinking water wells.

Any potential environmental impacts to the McLeod property will be associated with low risk activities including fuel leaks from parked vehicles which are small in volume (typically measured in millilitres) and limited to surficial staining which would be identified and remediated during the post-event inspection. Limited refuelling will occur onsite for temporary diesel-powered light standards. Any potential spills during refuelling will be identified and remediated during the post-event inspection,

Even if an activity occurred onsite that had the potential to impact groundwater, the risk that offsite wells located on adjacent properties would be impacted is minimal. The McLeod property is flat, with groundwater flow expected to be controlled by the Lillooet River which runs along the western edge of the property. With regional flow to the south in the direction of the Lillooet River, groundwater is expected to flow away from the adjacent residential properties towards the Lillooet River. Given that groundwater flow is expected to be away from the properties, no significant potential contaminant sources, and the short duration of the non-farm use, potential impacts to residential drinking water wells are highly unlikely.

4. SOIL TESTING AND PROTECTION

Soil Quality testing for the McLeod property is required in order to determine a baseline dataset to address issues of potential compaction and pollution. The SLRD will require this testing to be submitted to the SLRD office no later than June 3, 2016.

- *Pre-PMF event testing must occur in order to establish a baseline dataset from the environmental, chemical, and physical perspectives. Post-PMF event testing must be done immediately after the vehicles have vacated the parking area and prior to any plowing or other actions are taken on the parking areas in order to observe any spills and sample effectively. Pre and post event testing must be done at a minimum of 12 locations on the property.*

PGL does not recommend completion of a baseline data set to assess the environmental, chemical and physical perspectives of the property. As recommended by the SLRD and PGL's Agrologist Report prepared as part of the Non-Farm Use Application, an inspection of the parking area will be conducted following completion of the PMF event, which will address any potential environmental impacts to site soil. During the post event inspection, any potential spills will be identified, remediated and confirmatory samples will be collected and analyzed. Results of any remedial activities will be summarized and reported to the Agricultural Land Commission and the SLRD.

The soils of the sites consist of native soils and their physical, chemical and environmental characteristics have been well documented by existing soils reports. Given the historical use of the property – forested and access road through the property until the site was cleared in late 2015, there are no identified areas of potential environmental concern which need to be documented. Collection of pre-event soil samples will not have a role in remediating any potential spills as confirmatory soil samples will be required to meet the BC Contaminated Sites Regulations Agriculture Land Use Standards, regardless of pre-event soil conditions.

Since any potential spills will be from above ground sources, impacted areas will be clearly visible and identifiable during the post event site inspection. Remediation and sampling will be focused on these identified areas. Collection of randomly located soil samples from across the property would not be an effective mechanism to address the risk of spills. Collection of pre- and post-event soil samples may be warranted in the event there was onsite fuelling or wide-scale transfer of fuel or hazardous liquids. As these activities will not be occurring, PGL recommends that any potential impacts to soil resulting from leaks or spills be addressed by a post-event inspection and remedial activities if required.

PGL has completed post-event inspections for all PMF events as a condition of the ALC non-farm use approval. It is important to note that no spills or leaks have been identified during any of the previous Pemberton Music Festival events.

- *A site characterization of the McLeod property is required to describe the environmental, chemical, and physical factors including metals and hydrocarbon testing along with soil compaction testing (e.g. penetrometers etc.). Testing must be done by qualified professionals with expertise in soils and contaminated land assessment. The first year it is important that a rigorous testing protocol be employed to establish a baseline. The testing may be modified in subsequent years as data is obtained and analyzed.*

As noted in our above response, PGL does not recommend completion of a soil sampling program for environmental, chemical and physical factors. The environmental, chemical and physical factors have been well documented already. Any potential issues relating to environmental and chemical factors associated with leaks or spills will be addressed during the post-event inspection and potential remedial activities. No other activities associated with the festival will be occurring on the McLeod site which would be considered an environmental risk.

In addition to environmental and chemical factors, the SLRD recommends that pre-event soil compaction testing be completed. PGL does not recommend soil compaction testing. Site soil characteristics, calculated outdoor recreation carrying capacity, and proposed site activities, as well as seasonal moisture conditions, mean that site soils have an inherent ability to sustain the proposed temporary non-farm use without adverse impacts. Also, the temporary duration of the event (four days), and low potential impact associated with the activities (temporary passenger vehicle parking) will create a very low risk of soil compaction. Compaction resulting from equipment weights of less than 10 tons per axle is generally restricted to the upper foot of the soil. By and large, even the biggest tractors weigh less than 10 tons an axle and the vehicles which will use the site for parking are significantly lighter than 10 tons per axle. Any compaction occurring in this zone can be largely alleviated by tillage.

Following the event, a professional agrologist will complete an inspection and report to assess whether site soils have been impacted by festival activities. Should compaction be observed, soils will be tilled to mitigate compaction, which is an accepted agricultural practice. In an attempt to maintain soil fertility, tillage activities will be restricted to dry periods to minimize further compaction. Tilling is expected to reduce compaction and improve infiltration rates. Subsoiling could also be an option, but it is unlikely that it will be required due to the limited potential for deep compaction.

Any potential impacts of compaction will be identified during post-event site inspection.

- *A basic spill prevention and response plan should also be prepared for the festival parking areas and should be submitted to the SLRD office no later than June 3, 2016. The plan should reference the use of grass protection mats to cover the access and circulation roads on the property. This will be made a condition of the temporary use permit. The plan should also include a parking plan that makes reference to directing heavy vehicles to locations that are less environmental sensitive. This should also be reflected in the traffic and parking management plan (see below): all heavy vehicles arriving at the site should be directed to park in areas away from any riparian setbacks and other sensitive locations.*

Please find attached our basic spill prevention and response plan for the festival parking areas. Use of grass protection mats for access roads have not been included in the plan as while they are suitable for reinforcing and protecting grassed surfaces prone to wear, rutting, and smearing, they are not suitable for actively farmed agricultural properties and have been developed for grasses (lawns) and not oat production.

Manufacturers strongly advise that newly installed grass reinforcement mesh should be left unused until the grass has grown through the plastic net apertures and a strong interlock has been achieved, normally after a few weeks during the growing season rising to a few months out of the growing season. This is to allow the grass to fully grow through the grass reinforcement net and allow the grass sward to create the strong interlock with the mesh. If the surface is used immediately, grass growth may take a longer period of time and may limit the effectiveness of the product initially.

Even if use of matting were to be compatible with the site's agricultural seed blend, it would require pre-event harvest to occur well before the event thereby reducing the harvest and agricultural productivity of the site.

5. EROSION AND SEDIMENT CONTROL

'An erosion and sediment control plan is required for both properties, and as part of that silt fencing must be installed along all waterbodies with respect to the necessary riparian setbacks. The SLRD will require this plan to be submitted no later than June 3, 2016.'

Please find attached our Erosion and Sediment Control plan as requested.

PGL has not included recommendations for silt fencing as no exposed soils will be present onsite following planting, thereby reducing the potential for erosion and sediment transport offsite. At the time of the event, the site surface will have been planted and stabilized, supporting rainfall infiltration. Furthermore native site vegetation has been retained along a 30m-wide buffer along the Lillooet River, as well as a buffer set by Cascade's Riparian Areas Regulation compliance report for the dry channel on the eastern side of the McLeod property, both of which will provide the required sediment control required should sediment be mobilized.

LIMITATIONS

PGL prepared this report for our client and its agents exclusively. PGL accepts no responsibility for any damages that may be suffered by third parties as a result of decisions or actions based on this report.

The findings and conclusions are site-specific and were developed in a manner consistent with that level of care and skill normally exercised by environmental professionals currently practicing under similar conditions in the area. Changing assessment techniques, regulations, and site conditions means that environmental investigations and their conclusions can quickly become dated, so this report is for use now. The report should not be used after that without PGL review/approval.

The project has been conducted according to our instructions and work program. Additional conditions, and limitations on our liability are set forth in our work program/contract. No warranty, expressed or implied, is made.

CLOSING


We trust that this meets your needs. If you have any questions or require clarification, please contact Stewart Brown or Ned Pottinger at 604-895-7612 and 604-895-7600, respectively.

PGL ENVIRONMENTAL CONSULTANTS

Per:



Stewart Brown, M.Sc. P.Ag., R.P.Bio.
Lead Consultant



E.L. (Ned) Pottinger, M.Sc., P.Geo., P.Ag.
Chairman

CSB/ELP/sr
\\pgl-van-file1\Project Files\4400-4499\4434 - Pemberton Music Festival LP\01-03_Client Docs\4434-01-03-SLRD
Comments Response-May16-Final.docx

Attachments: Appendix 1 – Spill Prevention and Response Plan
Appendix 2 – Erosion and Sediment Control

Appendix 1

Spill Prevention and Response Plan

Regulations, guidelines, and BMPs to be followed under this Plan include:

- *Fisheries Act* (Canada);
 - *BC Waste Management Act*;
 - Hazardous Waste Regulations BC Reg. 63/88 (includes amendments up to BC Regulation 319/2004); and
 - Fuel Handling Transportation and Storage Guidelines.
1. There will be no refuelling or fuel storage onsite.
 2. No petroleum products, including fuel and oil, shall be disposed of on the site. Waste oil shall be contained and stored in approved containers onsite and disposed of offsite.
 3. No equipment servicing will be undertaken within 30m of any watercourse or surface water drainage.
 4. Pemberton Music Festival (PMF) shall provide on the property, at all times, readily accessible spill response materials such as absorbent sweeps and pads.
 5. The PMF shall ensure that all required response materials are onsite and in adequate supply and site staff, including subcontractors are familiar with the requirements of the Plan.
 6. Heavy vehicles will be directed to park in locations on the property that are away from riparian zones and other environmentally sensitive areas.

In the event of a spill or emergency, PMF shall, at their cost, restore the site to the current Waste Management standards. PMF will be responsible for removal and appropriate disposal of (offsite), all waste and clean-up materials, equipment, and goods, including soils and water deemed to be contaminated by the MOE or Environment Canada.

Emergency Procedures:

- Immediately call **911** in the event of injury, fire or potential fire, or spill of a hazardous substance that gives rise to an emergency situation.
- ***If a spill has occurred, contact the following persons immediately:***
 - _____ (Primary) (____) ____ - _____
 - _____ (Secondary) (____) ____ - _____
 - _____ (After Hours Emergency Contact) (____) ____ - _____
- **In the event of a large spill, a properly trained employee should:**
 - Assess the area for any immediate dangers to health or safety (i.e., a car on fire). If any dangers are present, move away from the area, **call 911**.
 - Notify the primary and/or secondary contact from the list above and then continue your spill response. The primary contact should assess additional notification requirements (i.e. notify SLRD, etc. see Spill Reporting below).
 - Retrieve the spill kit from the closest location.
 - Assess the size of the leak and any immediate threat of the spill reaching a watercourse in the area. If there is an immediate threat and there are no safety concerns, then attempt to block the spill from spreading. Use absorbent (cat litter) and/or sock booms or rags to stop the spill from spreading.

- If the spill can be contained with absorbent booms, deploy them around the spill. Use the booms to direct the spill away from any immediate hazards.
- If there is no immediate threat, or after controlling the spill, try to plug or stop the leak, if possible. If applicable, put on protective gear (gloves, goggles, protective clothing, etc.) and plug the leak.
- Once the spill has been contained and any immediate threat has been minimized, contact the spill cleanup contractor and dispatch them to clean up the spill or commence spill cleanup procedures.

Spill cleanup for large spills should be handled by the Spill Cleanup Contractor:

Company Name _____

24-Hour Phone (____) ____ - _____

Appendix 2

Erosion and Sediment Control

Regulations, guidelines and BMPs to be followed under this section include:

- *Fisheries Act* (Canada);
- Land Development Guidelines for the Protection of Aquatic Habitat (Department of Fisheries and Oceans (DFO) and BC Ministry of Environment, Lands & Parks (BCE), 1992) including updates;
- Develop with Care: Environmental Guidelines for Urban and Rural Land Development in British Columbia;
- A Users' Guide to Working In and Around Water (MOE, 2008);
- Stream Stewardship: A Guide for Planners and Developers, 1994; AND
- Urban runoff quality control – Guidelines for British Columbia, 1992, Ministry of Environment, Lands, and Parks.

1. The main objective of the Erosion and Sediment Control (ESC) plan for the PMF is to ensure that site runoff entering watercourses does not exceed suspended solid levels as specified by DFO, FLNRO and/or SLRD regulations. This erosion and sediment control plan has been designed in accordance with the Land Development Guidelines for the Protection of Aquatic Habitat.
2. The runoff, sediment and erosion control plan for the PMF includes:
 - Retaining existing vegetation where possible;
 - Covering temporarily exposed areas immediately with suitably anchored polyethylene sheeting;
 - Protecting disturbed areas from erosion by revegetating with plant species native to the area immediately after the festival;
 - Maintaining an inventory of erosion and siltation control materials for emergency purposes
3. The runoff, sediment and erosion control measures will be in place before the PMF.
4. PMF shall be responsible for the continued effectiveness, maintenance and stability of erosion control devices.

Reclamation and Revegetation

Regulations, guidelines and BMPs to be followed under this section include:

- Land Development Guidelines for the Protection of Aquatic Habitat (Department of Fisheries and Oceans (DFO) and BC Ministry of Environment, Lands & Parks (BCE), 1992) including updates;
- Develop with Care: Environmental Guidelines for Urban and Rural Land Development in British Columbia;
- A Users' Guide to Working In and Around Water (MOE, 2008);
- Stream Stewardship: A Guide for Planners and Developers, 1994; and
- Urban runoff quality control – Guidelines for British Columbia, 1992, Ministry of Environment, Lands, and Parks.

1. PMF shall restore all work areas at the site to pre-festival status as much as possible. This will include removal of equipment, wastes, construction materials, fencing, boundary markings, construction mitigation facilities, etc. prior to completion of the festival.
2. PMF shall be responsible for leaving the site in compliance with all Acts and Regulations.

Other Notes

- A designated Environmental Monitor (EM) shall provide a letter to the SLRD confirming that the Spill Contingency and Response and ESC facilities have been properly installed, inspected and that they are operational in accordance with the approved Plans.
- A waterproof copy of the Plans, emergency contact information for the site owner and the designated EM for the site must be kept in at the site for the duration of the project.
- A final inspection of the site and a signed letter is required by the designated EM to ensure that PMF has successfully completed all Spill Contingency and Response and ESC plan requirements.