



2008/09 Board of Directors

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November 12, 2008

Kathy Eichenberger
Project Assessment Director
Environmental Assessment Office
PO Box 9426 Stn Provincial Government
Victoria BC V8W 9V1

Dear Kathy,

RE: Davidson Project

The Bulkley Valley – Lakes District Airshed Management Society is a grassroots airshed stewardship group established in 2003 to develop and oversee the implementation of a renewable and evolving 5 year Community Action Plan for Clean Air.

Extensive community consultation consisting of monthly meetings in Smithers, Burns Lake and Houston were held for 18 months to develop our Clean Air Plan beginning in 2003, and annual reviews since the Plan adoption in June 2004 are conducted with community input. Results of annual reviews, new versions of the Plan, and records of Board meetings and special events are posted on our website at www.cleanairplan.ca. This level of commitment and effort reflect the sensitivity of our airshed resulting from complex geography, predictable thermal inversions during winter months, and both traditional and new sources of fine particulate matter from wood smoke and road dust, as well as greenhouse gas emissions. We have met with measureable success in raising public awareness, developing new public policies, and delivering programming to aid both industry and residents to reduce emissions. **It is therefore with a strong sense of responsibility and concern that we submit comments to your office regarding new emission sources associated with the Davidson Project.** Our understanding is that air pollution (road dust and tailpipe emissions) resulting from a significant increase in traffic to transport largely waste rock to Endako is a critical concern, together with dust resulting from mining operations.

AMS was requested by valley communities in the 2007 Clean Air Plan review to facilitate a process for managing emissions from new sources and development through front-end project design. Truthfully, the Davidson Project represents the first concrete opportunity to be proactive on this front. We are in the midst of re-vamping our 2006 version of the Clean Air Plan and new chapters for both Transportation Emissions (expanding on road dust) and New Emission Sources need to be created. These two sources were not part of the original “ Big Eight” emission sources identified in 2003 as having the biggest health impacts. Much has changed since then, beehive burners have shut down, woodstoves are regaining popularity, and slash burning for forestry operations is now largely coordinated through our new Custom Venting Forecast system and our annual Burn Operators Forum.

Our thoughts for how to deal with transportation emissions and new emission sources are rooted in our experience and knowledge over the past five years, and the specialized expertise that staff and our nine directors bring to our organization. Our most effective solutions have involved employing best practices, **reducing emissions during days of poor venting, investing in low to zero emission technology**, and identifying and removing barriers to behaviour change. Best practices range from reducing road dust by wetting or paving heavily travelled roads, to the timely spring clean-ups of de-icing material, to adopting anti-idling policies. AMS would be happy to meet with Blue Pearl Mining and their consultants (and any developer) to put together a comprehensive strategy for reducing transportation emissions based on the above and other identified strategies.

In addition to specific strategies for reducing emissions, it should be known to the proponents that there are specific air quality management standards that existing and new industry are expected to meet or exceed within our airshed, which spans from Endako to Kitwanga. It is traditional for major industries to sit down with our group to develop a plan for meeting these standards, indeed that is how the original Plan was written and one third of our Board membership is comprised of industry, the other two thirds being government and public. Our next Board meeting is scheduled for November 26, 2008 and we will be discussing this issue in further detail at that time. Submissions to the Board from either your office or Blue Pearl can however be received at any time, and we will deal with them as they are received.

Sincerely,

L. Gallant

Laurie Gallant BES

Facilitator, BVLD Airshed Management Society

Director, BVLD Airshed Management Society

Cc: AMS Board of Directors
Hudson Bay Mountain Neighbourhoods
Blue Pearl Mining