



2008/09 Board of Directors

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November 27, 2008

Alison Walker, Planner
Town of Smithers
1027 Aldous Street, Box 879,
Smithers, BC Canada V0J 2N0

Dear Alison,

RE: Town of Smithers OCP

This letter is intended as a proper introduction to our organization and as feedback on the OCP Draft #1 with a focus on sections that directly reference or impact air quality.

The Bulkley Valley – Lakes District Airshed Management Society (AMS) 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**

Our mission is to facilitate clean air solutions in the Bulkley Valley – Lakes District Airshed.

with a strong sense of responsibility and concern that we submit comments to your office in the context of the Official Community Plan.

AMS was requested by valley communities including Smithers during the 2007 Clean Air Plan review to facilitate a process for managing emissions from new sources and development through front-end project design. We are at the beginning of reviewing our 2006 version of the Clean Air Plan (and in Year 5 of implementation of the original 5 year plan) and new chapters for both Transportation Emissions 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 respectfully requests that a meeting with Town Council and staff be arranged to address these two new chapters in the Plan, along with other relevant sections noted in our OCP review such as the woodstove exchange program and anti-idling policies.

General OCP draft comments

We are pleased with the new requirement to include strategies for meeting the climate change challenge through GHG emission reductions in new OCPs and feel that the language of this draft suggests a solid understanding of the cause and effect of GHG management in general.

We applaud the public consultation process both in terms of timelines, variety and number of participation options. We also appreciate the amount of time and energy contributed to this draft by Town staff and community representatives. This standard of commitment and sincerity stands as a model which we hope can be followed for other planning processes within the region.

There are many references to air quality which are cited below, but unfortunately, no specific references are made to the Clean Air Plan or the BVLD Airshed Management Society – we would like to see this oversight corrected and suggest that acknowledgement of the Plan and AMS be introduced as early as possible in the document and also included in a new Appendix that lists other official Plans that link into the OCP and the organizations responsible for updating and monitoring those Plans. We note that a very effective use of referencing the Smithers Energy Plan was done in this document, and that a reference is made to the Regional Solid Waste Management Plan (SWMP).

We would also like to see a *sustainability trigger list* associated with these linkages so that when decisions regarding new policies, programs, or developments are before Council, they can consult this list and call upon the appropriate agencies for comment. The trigger list identifies the primary building blocks and threats to sustainability and should reflect areas of concern clearly identified in the OCP draft through the public consultation process. This list might include the following elements: air quality, water quality, soil contamination, food security, energy security, holistic employment security- i.e. jobs that do not conflict with community sustainability etc, cultural diversity, training and education so that citizens can have holistic employment security, and healthcare. The objective of this mechanism is to provide insurance that the design of these new policies, programs and developments take a holistic approach that favours sustainability and justice for all community members.

Specific OCP comments:

page 7: *Developing green purchasing and anti-idling policies/ by-laws;* Absolute support. We are happy to provide assistance with an anti-idling program and have access to resources and information for this purpose.

page 28: *Heavy industrial – The intent of heavy industrial is to provide appropriate places for activities such as resource processing, manufacturing, warehousing, sand and gravel extraction and auto wreckers and similar uses which may by their nature cause noise, emissions, or visual impact and should be separated from other uses. The zoning bylaw shall specify appropriate site sizes, setback distances and range of uses to ensure that heavy industry can operate effectively. Retail and office use will be restricted to a minor role on these sites, and must be associated with the primary business;* Since air pollution is mobile, the downwind receiving environment must be studied as part of the zoning application process. The intent statement for Heavy Industrial could be modified to read

"...visual impact and should be separated from other uses on affected areas including those off-site and downwind." See also our general comments regarding conforming to air quality objectives for the BVLD airshed and using a sustainability trigger list to ensure that all activities are considered in the context of a holistic approach to community development. An educational program for heavy industry can be attached to the business permitting process to raise awareness of the connection between business operations and overall community sustainability goals.

page 35: *Air quality is an ongoing issue in Smithers. Continued air quality indicators exceed BC Environment air quality levels in Smithers, every year, regardless of local meteorological conditions and emission reduction and management strategies. Increasing fossil fuel prices are likely to increase the use of wood heating further contributing to this problem and effectively eliminating any improvements made through the replacement of older stoves with more efficient, cleaner-burning, government approved stoves and boilers.* See general comments regarding conforming to air quality objectives for the BVLD airshed and using a sustainability trigger list to ensure that all activities are considered in the context of a holistic approach to community development. We would also like to see a public review of the Wood burning appliance and smoke control bylaw and follow up with the Town on strategies for education and enforcement. AMS can assist with this action item.

page 36: *Within the community, there is concern that increased mining in the area may bring negative environmental and social impacts. However the economic potential of these resource industry ventures is recognized and hoped for. Generally, residents believe that environmentally sensitive areas are not adequately protected and that regulations and laws should be strengthened. Residents want to maintain and enhance existing natural areas surrounding the community and protect sensitive and rare ecological areas from development.* Agree with these statements, see general comments regarding conforming to air quality objectives for the BVLD airshed and using a sustainability trigger list to ensure that all activities are considered in the context of a holistic approach to community development. We are also happy to provide a copy of our letter regarding the Davidson Project which identifies specific air quality concerns. We would like to see a requirement that all development proponents be made aware of the 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 AMS 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.

The community identified improving air quality, setting up a town wide recycling program, and managing the impacts of future mining expansion on Smithers, as key opportunities for improvement. AMS is pleased to see this statement in the OCP and notes that there are numerous air quality related improvements to be made to the waste management system, namely transportation of materials and burning activities. We strongly encourage the Town to demand a public review of the Regional Solid Waste Management Plan (RSWMP), which has not been reviewed since 1996. We also note that most of the waste reduction and diversion strategies have not been implemented in this Plan and question the sincerity and capacity of the Regional District to implement the full scope of the RSWMP or to follow proper process for amending the Plan (witness the current initiative on Energy from Waste). Many of the comments we have on the OCP draft and public consultation process also apply to the RSWMP.

page 38: *Policy 5 Support the use of modern pollution control technology and implementation of additional emission reduction and management strategies to improve the air quality of Smithers and the Bulkley Valley.* Fully support this policy and would suggest that the word “reduction” be inserted before “*control technology*” to emphasize prioritizing reduction strategies. AMS is developing an Air Quality checklist for local governments that can be used in support of this policy and will present this to Council in the new year.

Policy 8 Continue to support the woodstove exchange program. Fully support this policy and request that this program be called the Skeena-BVLD woodstove exchange program administered by the BVLD Airshed Management Society. AMS would also like to see this policy expanded to include effective education and enforcement of relevant bylaws.

Thank you for considering our comments and suggestions. Please do not hesitate to contact our office at 250-847-1672 or by email at info@cleanairplan.ca to follow up on the comments made in this letter.

Sincerely,

Laurie Gallant BES Facilitator, BVLD Airshed Management Society	Jeff Anderson Director, BVLD Airshed Management Society
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Cc: AMS Board of Directors