



bulkley valley - lakes district airshed management society

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Bathurst Resources Limited
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January 17th, 2025

Re: Public Consultation Request pertaining to Telkwa Coal Development Applications

Dear Sirs,

We are the Bulkley Valley Lakes District Airshed Management Society (BVLD AMS) and we are the stewards of the BVLD Airshed Management Plan, also known as the [Clean Air Plan](#). A balance of public health and economic values in this Plan was put forward back in early 2003 and our society asks you to review and respect the Plan as it pertains to land use development and permit assessments of any kind. You can find the plan on line [here](#).

Would your office be willing to cohost or sponsor workshops within our communities to address your findings and assessment? We want to ask for adequate public consultation with the community that includes the BVLD AMS, it's members, friends and the public at large. We are willing to offer varied expertise from our membership who have been engaged in air quality planning and management for over 20 years. Contact our coordinator to discuss the possibilities.

Directors of the society have commented in other venues on the Telkwa Coal proposal and do have some concerns.

- particulate matter - it's composition and estimations
- achievement of the Provincial daily and annual PM emission targets, monitoring and cumulative effects
- air quality modelling and travel of contaminants
- nuisance dust and fugitive emissions from startup, transportation, process equipment and lots
- impacts to ecosystems, economies, health and quality of life
- First Nation rights

Please respond with your plans for community consultation and provide us some information on when it will take place. We would recommend 60 days for consultation with perhaps more than 1 workshop in each of Telkwa and Smithers.

Links to the Plan: <https://cleanairplan.ca/new2/wp-content/uploads/2017/06/cleanairplan2012.pdf>, our [website](#) and our blog, cleanairplan.ca/blog or contact us with inquiries.

Yours Truly,
Sue Brookes
For the BVLD AMS Board
E: coordinator@cleanairplan.ca
C: 250 847-0678

For a map of the airshed go to: <https://cleanairplan.ca/blog/2022/03/19/maps/>

“Reducing fine particulates, greenhouse gases, waste production and energy consumption can be achieved in numerous ways in all sectors and by every individual.”

Clean Air Plan Industry Outcomes:

Specifically mining permit applications should consider:

- a. Facility and point emissions
- b. Road and off-road dust or fugitive emissions (roads and lots)
 - paved road dust - asphalt, salt/de-icing agents
 - unpaved road dust - weathered minerals, wetting agents
- b. Transportation or linear emissions
 - vehicular fuel exhaust
 - brake pads and tires
 - motor oil
 - train/rail or river transport exhaust
- c. Process Fuel (crushers, grinders, etc.)
- d. Mineral and ore dust components and particulate estimations
- e. Condensable process vapours
- f. Open burning (land clearing or barrel / solid waste management)
 - polycyclic aromatic hydrocarbons (PAH)
 - smoke
 - ash

We encourage spatial modelling with distinct locations and spatial coordinates to allow for the direct measurement of distance between them and sensitive receptors, such as vulnerable members of the population. The closure and reclamation process for mine applications is also necessary to include in consultation. A 2015 micro emission inventory for the Bulkley Valley Lakes District has shown the highest source of particulate emissions that year coming from a site no longer operational, Thompson Mining Inc.'s Endako Mine. Use this link for the [report](#).

Our rationale for this request:

1. The value of Clean Air remain intact.
2. The quality of our airshed is critical to our future communities health, agricultural production, food production, tourism, and recreation.
3. The possibility of long-term negative impacts is too great to justify the risk of missed opportunities to prevent, reduce and react to emissions.

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the BVLD AIRSHED MANAGEMENT PLAN

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