

## **CAN/Voices for Good Air Response to**

### **OBSCR Revisions**

#### **Draft Zone Map**

Clean Air Now (CAN)/Voices for Good Air is a group of Bulkley Valley residents concerned with the unacceptable air quality that often occurs in our area. We attended a webinar sponsored by the Province on April 26, 2018 and worked with others in our area to provide a response to the proposed OBSCR rule changes that were announced at that session.

We have now received a draft of a map that identifies the locations of the three zones that are proposed under the new OBSCR rules. In that draft map, it appears that the medium sensitivity zones for the Bulkley Valley have been expanded beyond the original proposal limiting this zone to approximately 20 kms. from populated areas such as Smithers. This expansion is particularly evident in the area to the south-southwest. In that geographic area the map identifies a medium zone that reaches to about 125 kms. from Smithers (given the map's scale and definition, making accurate measurements is somewhat difficult, but we believe that our estimates are accurate).

As we have witnessed this year during the September-October period, Smithers and the rest of the Bulkley Valley has been

adversely affected by smoke coming from as far away as the limits of the 125 km. proposed zone to the south-southwest. For this entire period, PM<sub>2.5</sub> has averaged 9.5, thus exceeding the annual average target of 8.

In other years, the Smithers area has experienced smoke from open burning from as far away as Babine Lake to the east and northeast and the limits of the Telkwa River Valley and the high terrain surrounding the headwaters of the Zymoetz/Copper River to the west. These sources are well outside the medium sensitivity zone limits that appear in the proposed map.

Consequently, to at least prevent the OBSCR rules from effectively being weakened insofar as slash and other open burning affects the Bulkley Valley, we suggest that the medium sensitivity zone for this area be extended to an area with a circumference of no less than 125 kms from Smithers and Wit'set/Moricetown. By extending the medium zone in this fashion, the new rules will at least not make matters worse.

Since the proposed zone to the south-southwest beyond Houston already effectively reaches to our suggested limit in that direction, we see no reason why the zone cannot be extended in a similar fashion in the other directions. A medium zone of this size would also be consistent with the zones that appear on the draft map covering areas farther to our south such as 100 Mile House and Kamloops.

In closing, we want to note that we do not support the weakening of the OBSCR rules represented by the establishment of the new so called low sensitivity zone 3. We offer the above comments only as a way to prevent the worsening of the effects of slash burning on our air shed. In addition, by weakening the rules as proposed, the air quality in other, more rural areas of the Province, including many First Nations communities will be significantly worsened. So, why do it?

In the final analysis, we should be working towards eliminating slash burning entirely, not making it easier. It damages our health and releases vast amounts of greenhouse gases. We can do better.

For CAN/ Voices for Good Air

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