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Smithers, BC

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Comments on the DRAFT BV Smoke Management Plan – Pilot under the Open Burning Smoke Control Regulation

The BVCRB welcomes the opportunity to comment on this draft plan.

The purpose set out in the draft is, “to minimize impacts to human health from smoke generated from open burning of debris while still allowing Burn Operators to meet fire hazard abatement requirements as per the Wildfire Act and Regulations.” For purposes of these comments we assume that there is no contradiction between the requirements of these other legal instruments and the aims of this Plan.

The pilot is expected to implement and test the effectiveness of the objectives that have guided the revision of the OBSCR. The working group membership seems broad but does not cite Northern Health, which might be expected to have something to say on the topic. In the past smoke visibility complaints have been received from aircraft operators, it might be useful to consult or coordinate with local aviators or NAV Canada. This appears to be the intent of section 6.2.

On Page 4 is, “until the regulation receives approval in the legislature.” It isn't usual for this to happen, normally Cabinet approves regulations.

The geographic scope of the Plan is the Bulkley TSA. Administratively it is easy to see why this would be the case, but we note that adjacent TSAs may either provide inputs or receive outputs of pollutants to or from our airshed, so a broader scope of analysis is likely to be useful.

The first listed Smoke Management Strategy is to consider alternatives to Open Burning. This is a step in the right direction – less burning seems the likeliest means of producing less smoke. We are referred to Appendix B (Best Management Practices) for details. It might be useful to add to B.1 a requirement that the operators report what alternatives were considered and why the outcome used was chosen.

Section 3.3 of the SMPs refers to BMPs and consequences of non-compliance. It isn't clear what monitoring and compliance mechanism will be used. In section 3.5 the intent of avoiding large public gatherings and potential exposure is good. The Midsummer Festival has changed its dates, although these seem unlikely to be impacted.

The .pdf version of this draft has typos at the bottom of pages 5, 7, and 14 - these need to be cleaned up. Page numbering between the main Plan text and the appendices is inconsistent.

On page 9, section 4.2 reference is made to Ministry of Environment monitoring. It seems this should stipulate ambient monitoring.

There is a requirement that the burnt surface area must not have more than 10% emitting smoke. It might be useful to add to appendix B.4, “crew training,” some training in area estimation. It seems it would also be useful to have pictures of burned areas where it is estimated that the emitting area is 10% or less. This might be addressed by Appendix B.7, para. c.

Dave Stevens, Chair
BVCRB