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Consultations on Proposed Options for Provincial
Air Quality Objectives and an Airshed Planning Framework
Summary Notes

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Introduction

In keeping with a Provincial commitment to lead the world in sustainable environmental management, including having the best air quality, the Ministry of Environment (“Ministry”) is advancing an initiative to achieve and go beyond the Canada-wide Standards for particulate matter and ozone by 2010. Coupled with this, the Ministry is in the process of establishing a provincial framework to support air quality planning across British Columbia. Together, it is expected that these initiatives will provide for:

- More of a focus on very fine particles of less than 2.5 microns, or PM2.5, which pose the higher risk of being deposited within our respiratory systems and, in turn, can lead to a range of negative human health impacts.¹
- The Provincial government to meet its obligations under the Canada-wide Standards which includes implementing programs that provide for continuous improvement and “keeping-clean-areas-clean”.
- A more consistent approach to airshed planning efforts across British Columbia.
- Management criteria that can guide daily decisions on permitting of PM2.5 sources, monitoring for PM2.5, and airshed planning.

As a first step in moving forward, the Ministry sponsored two consultations with individuals representing academic institutions, non-profit organizations, businesses, and community interests. One of these consultation events was held in Vancouver on February 22nd, 2006, and the other in Prince George in early March, 2006.

What was explored during these consultations?

In support of the adoption of air quality objectives that can guide the Provincial government in its regulation and permitting,

environmental assessments, and monitoring and reporting of air quality, two alternatives were presented including the specific objective levels to be achieved along with allowable exceedance frequencies and phase-in dates.

The consultation on airshed planning sought views and comments on the design of a province wide approach that would foster collaboration and shared stewardship. Specific areas of discussion included the principles and goals of a province wide framework along with how the planning process should be structured and resourced.

This report summarizes the comments that were received, and presents areas of agreement along with diverging opinions. The first part of the report provides an overview of the major points that were raised in response to the questions posed during the session. The remainder of the report presents eight general issues that were raised in the context of the consultation, as well as considerations for next steps.

Is there an opportunity to still provide feedback?

As noted at the end of this report, it is anticipated that there will be another set of consultations. Prior to this happening though, comments can still be provided electronically care of **The Sheltair Group**, jvlemmiks@sheltair.com.

For further information on the consultations, and the related initiatives of the Ministry, please contact **Glen Okrainetz, Air Protection Section** care of: glen.okrainetz@gov.bc.ca; or **250-953-3080**.

¹ - Particulate matter comprises airborne particles of a microscopic size. In most cases these particles are emitted to the air from combustion sources (e.g., diesel vehicles, prescribed burning, wood stoves and wild fires) and industrial processes, or produced through reactions in the atmosphere.

Air Quality Objectives

Q1: Should there be flexibility at the community level or uniform adoption of standards across the province?

Overall there was no support for a two tiered approach to be taken in establishing province-wide air quality objectives. In Prince George, participants were strongly opposed to the two tiered air quality objective on the basis that they did not want to be perceived as having lower standards in terms of air quality than the rest of the province. In terms of what the objective should be – the question was generally raised “what is the scientific significance of 25 ug/m³ as opposed to 30 ug/m³?”. Through this discussion, an overall difference in opinion as to an appropriate provincial air quality objective emerged:

- The air quality objectives for the province should be equivalent to the Canada-wide Standards (**the predominant view among participants**).
- The Canada-wide Standards are based on outdated research, and in keeping with this the air quality objectives for the province should be based primarily on a consideration of health impacts (i.e., the objectives would be significantly lower than the national standards – for example, 15 ug/m³).

Furthermore, a difference of opinion emerged around the need for, and implications of, setting community specific targets:

- Communities should be able to set their own (more stringent) targets (**the predominant view among participants**).
- The existence of multiple standards will result in a “balkanization” of the province

and complicate the ability to demonstrate compliance (e.g., for industry operators).

Imposing more stringent air quality objectives over time was generally supported as long as Provincial resources were made available to assist with their implementation.

Q2: Are the proposed timelines as well as allowances for exceedances appropriate?

In general, participants were opposed to the change to absolute exceedances (i.e., 1 allowable exceedance) and would have preferred to see the average reduced over time. Questions were raised, for example, about natural occurrences such as forest fires in the context of the absolute exceedances.

With respect to the presented timelines for implementation, these were seen by most participants as too aggressive. Some areas, notably Prince George, will not reportedly be able to comply with the requirement by 2006 and perhaps not even by 2010 due to the need for source identification and monitoring, plan development and implementation. Community specific timelines were proposed in order to recognize contextual issues related to sources. More specifically, communities with easily identifiable sources would likely be able to take action more quickly to reduce emissions than those with a complex emissions scenario. While no specific alternative timelines were put forward by participants, there was support for a modified schedule with set milestones.

In contrast to the above, one participant indicated that the proposed timelines are appropriate and that the Province could introduce incentives for demonstrated

progress in meeting or exceeding the established timelines and requirements. Recognition for air quality improvements through incentives was also identified in the discussion of funding for implementation in the afternoon session.

Q3: Which of the two options best support the principles of continuous improvement in all areas and in a way that recognizes challenges to the Province?

As indicated earlier, there was no support for a two tiered approach to province-wide air quality objectives (i.e., Option A as presented in the consultations), but participants generally sponsored the concept of communities being able to set their own targets within the context of provincial objectives. To this end, an airshed plan was recommended as the basis for individual communities in setting their own objectives.

At the same time, some concern was raised with respect to there being a level playing field if different targets were pursued by communities across the province. As noted above, participants further indicated a discomfort with the use of an absolute number of exceedances and would have preferred a more stringent one day average.

Finally, questions were raised by participants, and as noted earlier, about the relevance of setting provincial air quality objectives that are lower than the Canada-wide Standards in the absence of clearly stated and specific health justifications. One participant commented that British Columbia remains a resource based economy and that industry has to locate their operations according to access to these resources (i.e. which may be in airsheds that are already stressed).

Airshed Planning Framework

Q1: How should planning be initiated in pristine communities and in attainment areas?

Participants generally felt that the Province, and/or regional health authorities, should take a leadership role in initiating airshed planning although a smaller number of individuals indicated that this role should be limited to those airsheds with a demonstrated need. Three alternative approaches to triggering planning in pristine and attainment areas emerged from these discussions:

- Pristine areas should have airshed management plans, including zoning of development and “precautionary planning”.
- Management plans should be triggered by measurable impacts such as increases in emissions, hospital visits and other health impacts.
- Management plans should be triggered by new development and linked to the environmental assessment process (i.e. planning not required unless there is a change).

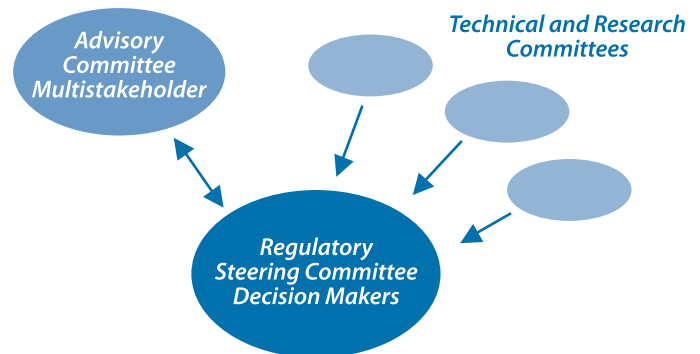
Local governments were also identified as important for initiating processes and critical for engagement during plan development and implementation. However, it was further emphasized by some speakers that the Provincial government needs to maintain a key role both in initiating and participating in local planning processes (particularly for technical support) in order to ensure consistency.

Coupled with the above, participants supported the concept that airshed planning should be integrated into other processes for planning including growth or economic development, energy, and greenhouse

gas management. Furthermore, it was highlighted that these processes should be science based where sufficient research and information is available.

Q2: What should be the role and membership of the Airshed Planning Committee?

Multiple levels of airshed planning committees were proposed in order to meet divergent needs. These are outlined below.



Regulatory Steering Committee

Members: Decision makers from government and industry (permit holders, First Nations, etc.)

Role: Oversee the development and implementation of plans and monitoring programs, along with reporting to the Advisory Committee and the public. However, the Province should maintain overall responsibility for objectives, standards, permitting etc. This committee would be further responsible for identifying geographic boundaries, the status of air quality relative to Provincial and Federal standards, and opportunities for maintaining or improving quality.

Advisory Committee

Members: Open membership with a multi stakeholder focus that is based on principles of inclusion and representation of the interests within an airshed.

Role: To provide input to the Regulatory Steering Committee as described above.

Research Committees

Members: Technical experts.

Role: To provide scientific and technical research and advice to other committees (e.g. conducting emissions inventories and modeling).

Most participants supported the concept of multiple committees with different functions. Some individuals indicated a preference towards the concept of a provincial level committee that provides overall leadership for the process across British Columbia. The chairs of the committees were seen to be critical positions that would have to be neutral in the conduct of their responsibilities, although some participants expressed the opinion that local government representatives would provide for direct accountability to their local constituents.

In terms of the scope of airshed planning committees, many participants felt that these committees should consider economic development and growth as well as integration with other planning processes.

Q3: How should the planning process be funded and how should funding be allocated?

Generally, participants indicated that the Province should contribute most of the funding for airshed planning although there was also support for industry based sources (e.g. all polluters), as well as from gas taxes, permit fees or wood revenue taxes and local government (i.e., at least in kind resources). Multiple Provincial departments were

identified as potential funders (e.g. Ministries of Transportation, Health and Forests). The Federal government was also identified as a potential funder.

A transparent, equitable funding process for communities (airsheds) was raised as a critical component by many participants, with the potential for formula based funding that takes into account population, exposure, contribution to emissions and the extent of the problem. There was significant support for the concept that distribution could be based on a tiered approach with those communities with the worst air quality having greater access to resources and funding. Another consideration as raised by a participant was the presence of both preventative and reactionary strategies.

A range of possible roles were identified for the Advisory Committee which are indicative, in turn, of the potential allocation of funding and resources as described above:

- Administration and facilitation;
- Integration with other processes;
- Leveraging financing where possible;
- Set local objectives;
- Educate and publicize the process (communications role);
- Promote inclusion and consensus;
- Conduct research;
- Data collection and analysis.

Participants also noted that the direction and guidance as provided by the aforementioned committees should be considered in the review of permits, and local government planning processes (e.g. Official Community Plans).

Finally, participants in Prince George stressed that funding should be committed on a longer term of three to five years in recognition of the timeframe relevant to airshed planning.

Q4: How can plans be implemented and monitored in the long term?

In general, two approaches to implementation emerged:

- Options should be based on better understanding of emissions sources and baseline information.
- Implementation should be initiated before all the data is in hand.

Consideration of cost effectiveness and predicted benefits of air quality measures was suggested by a majority of participants as an important aspect to implementation. The creation of a provincial Air Quality Committee was raised again with the responsibility to report on implementation on a provincial basis and to integrate efforts where possible while local committees reported locally.

As noted earlier, there were differing views on whether the permitting process should be linked into airshed planning with strong positions being taken on both sides.

The importance of effective committee administration including goal setting, budgets, reporting and accountability was stressed by Prince George participants. A strong goal setting process that included defining measurable outcomes and the opportunities for readily achievable successes (i.e., “low hanging fruit”) was seen to support effective implementation.

General Observations

1. Linkages with current monitoring programs and approaches

Significant concern was raised by participants about the adequacy of current monitoring programs and whether planning activities will be focused, only for the most part, in areas of the province where monitoring stations currently exist.

Participants also questioned how data from monitoring stations would be applied. For example, would the worst monitoring station results be taken as indicative of air quality in a community or would there be an average of the results across all monitoring stations within a defined area? Overall, participants felt that more guidance was needed in terms of placing monitors (with a desire to base such decisions on scientific considerations as well as public concern), the use of existing monitoring stations, and the application of monitoring data.

2. Defining an airshed

It was pointed out in the consultation that airsheds are loosely defined and do not conform to political boundaries (e.g. municipalities and regional districts). Participants were seeking guidance, as a result, on the approach to be taken in defining communities or airsheds for the purposes of airshed planning. There was also an expressed need for clarity in terms of how the air quality objectives will be applied or measured within this context, with some concern being raised that local councils may be vulnerable to pressures from community interests. One participant raised the issue of “downstream” communities and how they could engage in processes in neighbouring communities or airsheds. Another question raised was how conflicting goals for

communities within an airshed could be managed.

3. Consequences of reported exceedances

Participants questioned the consequences should a community or airshed exceed the established air quality objectives. One participant commented that the air quality objectives would lack credibility if there is no supporting regulatory authority.

4. Linkages with the proposed Federal Clean Air Act

Participants were generally seeking an explanation of how the provincial air quality and airshed planning initiatives related to, or interacted with, the Federal government’s proposed *Clean Air Act*.

5. Linkages with government permitting and related Provincial initiatives

A number of participants indicated that the permitting process should be directly linked to airshed planning activities whereas others felt that they should be de-linked. Many participants also felt that other Provincial (and Federal) government departments with complementary mandates and initiatives should be involved in airshed planning and funding efforts. Some participants suggested a “bubble” type approach whereby any new source of emissions would have to facilitate the reduction of emissions from other sources. This would ensure, according to the same individuals, a net benefit for the community.

6. Gauging the costs of action and inaction

Questions were raised by a number of participants about whether there had been an analysis of the costs associated

with reducing emissions as well as those associated with inaction (i.e. health and economic impacts of degraded air quality).

7. Establishing a provincial Air Quality Advisory Board

Some participants recommended the establishment of a provincial Air Quality Advisory Board that could oversee airshed planning processes. This committee would provide for general oversight and leadership of airshed planning efforts by defining monitoring protocols, supplying resources and tools, and administering the funding process.

8. Delegation of responsibility

Participants expressed concern that the province was delegating responsibility for air quality to local governments. At the same time, there was general endorsement of community based planning processes as long as the Provincial government provides sufficient support in the form of resources and guidance.

The Way Forward



In advancing the proposed air quality objectives and framework for air quality planning, consideration needs to be given to further consultations, including additional communities located in the Interior of the province, with a focus on:

- Advancing a preferred approach to establishing a provincial air quality objective that provides for greater flexibility in timing and application including having communities set their own targets in a way that is proactive and reflective of local circumstances.
- Describing in a more specific manner, and encouraging comments on, the potential governance structures, resourcing and approaches to airshed planning in the province.

This summary report provides a starting point in preparing the revised materials and communications that could inform this next set of consultations.