

POWELL RIVER REGIONAL DISTRICT

5776 Marine Avenue Powell River, BC Canada V8A 2M4

Telephone: 604-483-3231 Fax: 604-483-2229

Email: administration@powellriverrd.bc.ca

"GENETICALLY ENGINEERED FREE CROP AREA"

November 12, 2008

Honourable Barry Penner,
Minister of the Environment
PO Box 9047
STN PROV GOVT
Victoria BC, V8W 9E2

Dear Minister Penner:

Re: Open Burning Smoke Control Regulations Consultation Process

Amendments to the Open Burning Smoke Control Regulations will incorporate large parts of our electoral areas in the High Smoke Sensitivity Rating zone which has strict limitations on open burning. Our concerns about the implications of this rating were outlined in a letter to your consultants in July [copy attached].

This consultant subsequently informed our staff that the consultation process on the new regulations would involve "online facilitated discussions (webinars)" and these sessions would be "sector specific (i.e., local governments, forestry, agriculture...)."

Noting and objecting to the lack of opportunity for open, public dialogue on this issue, the Regional Board adopted a motion to advise you that it

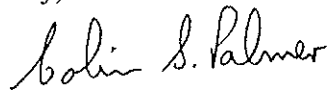
"considers the Ministry's lack of in-person consultation with the public on proposed amendments to the Open Burning Smoke Control Regulations (OBSCR) unacceptable, and requesting the Ministry to hold a public meeting in Powell River to inform the public of the regulation amendments proposed for this Region and for the Ministry to hear the local implications of these regulations."

You can see from this motion that this is an important issue to the Board. We in the rural areas of the Province feel that provincial officials in urban centres often formulate regulations without fully understanding how they will actually impact rural communities and individuals or how they will be enforced. Consulting just with other governments or government agencies on these matters is not enough. A face-to-face forum with individuals whose interests will be directly affected may give the Ministry some useful insight. It would also give the Ministry a chance to explain the rationale for the changes which may engender greater public support.

The open burning regulations were a very controversial issue locally when they were first introduced. A public meeting hosted by the Ministry at that time was very well attended and, although the discussion was heated at times, some good information was exchanged, information that may have actually influenced the regulations in their final form. This regional board would like to see the same process again.

I understand a public meeting on the regulations was held in Cranbrook. The people in the Powell River region are equally as deserving of the opportunity to hear and address Ministry representatives and I respectfully request that you ensure such an opportunity is provided.

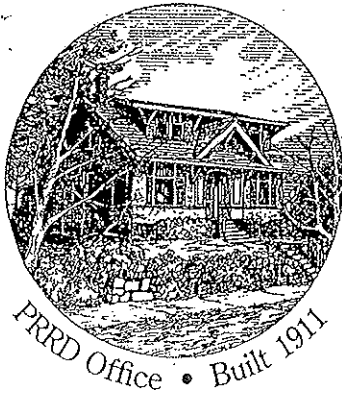
Sincerely,

A handwritten signature in cursive script that reads "Colin S. Palmer".

Colin S. Palmer, Chair

Enclosure

Copies to: C. Bertram, C. Rankin & Associates
R. Freedman, Air Protection, BC Ministry of Healthy Living and Sport



POWELL RIVER REGIONAL DISTRICT

5776 Marine Avenue Powell River, BC Canada V8A 2M4

Telephone: 604-483-3231 Fax: 604-483-2229

Email: administration@powellriverrd.bc.ca

"GENETICALLY ENGINEERED FREE CROP AREA"

July 28, 2008

Ms Cindy Bertram
C. Rankin & Associates
Box 5293
Victoria, B.C.
V8R 6N4

Via Fax: ~~250-483-2229~~
Original in Mail 2529

Dear Ms Bertram:

Re: Proposed Changes to the Open Burning Smoke Control Regulation

On behalf of the Regional Board, I wish to submit our comments on the smoke sensitivity rating assigned to parts of this regional district's electoral areas and what we perceive to be the negative implications of that designation. The City of Powell River [the only municipality within our boundaries] already restricts open burning, so our comments do not apply to that jurisdiction.

1. Smoke Sensitivity Rating

The Provincial "Overview Map of Smoke Sensitivity Zones" shown on the provincial website indicates parts of electoral areas A, B, C and D fall within the "High" rating. The Board refutes this rating. These electoral areas do not meet even the minimum population density [i.e., less than 200 residents per square kilometre] cited as the criterion for defining this classification. Further, the "Intentions Paper" notes that areas of High Smoke Sensitivity are prone to inversions. Inversions rarely occur in the populated areas of these electoral areas, and inversions that may occur are generally moved quickly off-shore by the prevailing south-east winds.

2. Local Implications of High Smoke Sensitivity Rating

The Board is concerned about the following implications:

1. A High rating will discourage clearing of land for agricultural purposes. While the regulation would not prevent the land-clearing, having to dispose of the debris by means other than burning will add to the already high cost of land clearing. This deterrent will work at cross-purposes to current efforts to promote local agriculture which will give residents access to a healthier food supply and will reduce the need to transport food from elsewhere with a consequent reduction in greenhouse gas emissions.

.../2

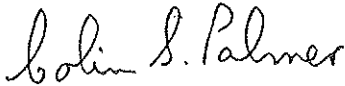
2. The inability to burn land-clearing debris is likely to result in wood debris and other vegetative waste being left on the ground. The accumulation of this material creates a serious fire hazard during the dry summer season.
3. Illegal dumping of wood and other vegetative waste is already common in some areas of this regional district. The inability to burn land-clearing waste is likely to exacerbate this problem.

The electoral areas of this regional district are essentially rural communities with limited population and a reliance on using the land for residential, agriculture and home-based businesses. We believe the High rating proposed for these areas will unnecessarily impede these traditional activities and will not have any substantial environmental benefit.

The Board requests that those parts of our electoral areas presently rated as "High" smoke sensitivity areas be reclassified to "Moderate".

We appreciate the opportunity to provide these comments.

Sincerely,



Colin S. Palmer
Chair

FL:bkp