

**DATE:** May 10, 2017

**FILE:** 5280-02

**TO:** Chair and Directors  
Committee of the Whole

**FROM:** Debra Oakman, CPA, CMA  
Chief Administrative Officer

**RE:** Air Quality Management – Next Steps

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### **Purpose**

This report presents next steps for air quality management, including the implementation of a three year outreach and incentive program; and correspondence with the provincial Ministry of Environment regarding proposed provincial open burning regulatory changes for the board's consideration.

### **Policy Analysis**

At the November 29, 2016 meeting of the Comox Valley Regional District (CVRD) board, the following motions were carried:

THAT the results of the emissions inventory, Ministry of Environment ambient air quality study and additional winter 2016-17 monitoring of fine particulate matter be presented at an early 2017 elected officials forum, focused on air quality management;

AND FURTHER THAT staff be directed to work with the Ministry of Environment to invite Dr. Scott Weichenthal to the elected officials forum to present the results of the Health Canada study "Biomass Burning as a Source of Ambient Fine Particulate Air Pollution and Hospital Admissions for Acute Myocardial Infarction", as they pertain to the Comox Valley;

AND FINALLY THAT representatives from the Cowichan regional airshed roundtable and Port Alberni air quality council be invited to the elected officials forum to discuss air quality management in their communities.

The air quality elected officials forum was held on April 4, 2017, with almost all Comox Valley elected officials in attendance. At this forum, the following motion was carried:

THAT the report dated March 30, 2017 regarding an update on current and upcoming air quality initiatives in the Comox Valley and the presentations and background information from air quality stakeholders be received.

At the following meeting of the CVRD committee of the whole on April 11, 2017, the following motion was carried:

THAT staff prepare a report on possible uses of grant funding from Island Health, in particular, initiatives supporting the air shed.

## Executive Summary

Managing air quality is a multi-jurisdictional effort and is vital to protecting public and environmental health in the Comox Valley. The latest Georgia Strait air zone reporting for 2011-2013 ([link](#)) identified local exceedances of annual and 24-hour CAAQS for fine particulate matter (PM<sub>2.5</sub>), suggesting management actions are needed to improve Comox Valley air quality in order to achieve the national standards. A June 2016 report to the CVRD board ([link](#)) provided an outline of air quality management actions and regulations in the CVRD.

Air quality management has also been a recent citizen concern due to temperature inversions and wood smoke in the winters and smoke from open burning activity in the area. A citizens group known as Breathe Clean Air Comox Valley has been formed, and appeared as a delegation at the May 2016 meeting of the CVRD committee of the whole. Air quality was also one of the strongest themes cited by respondents in the recent Comox Valley Community Foundation's Vital Signs survey.

An air quality elected officials forum on was held on April 4, 2017. A variety of experts in the air quality field presented the latest information on recent air quality studies and reports in the Comox Valley, including the emissions inventory which was a study commissioned in partnership between the Ministry of Environment (MOE) and CVRD. The information presented identified the types of impacts related to the two main fine particulate matter sources in the Comox Valley – open burning, and wood heating.

Staff have taken into consideration the discussion at the April 4 forum, and have crafted a three year workplan aimed at accelerating improvements to the Comox Valley airshed. In terms of funding this program, the CVRD received in 2016 a Community Wellness Grant from Island Health totalling \$98,933. The purpose of the grant is to develop population level interventions that address a multitude of health risk factors for groups including seniors, either directly or in partnership with other community organizations. As air quality has been identified as a significant public health risk factor in the Comox Valley, a program that works to improve local air quality would suit the purpose of this grant funding. Reporting on the use of this grant is upon request from Island Health and a report is required by June 30 of the progress to date. This grant provided \$14,700 for the CVRD's share of costs for the recently completed emissions inventory. The program described in this report would be implemented with the funds remaining from this grant. As the CVRD has no service dedicated to air quality management, the proposed program would fall under the general administration function.

The proposed program is composed of two major elements – a smart burning education and outreach program, and a top-up incentive program for wood stove exchanges. Included in table 1 below is a general outline of the two elements of the program, and attached to this report as Appendix A is a draft communications plan for the program. As part of the implementation of the program, staff will investigate opportunities to focus education and incentive efforts in neighborhoods identified as having elevated levels of wood smoke pollution.

Table 1 - Air Quality education and incentive program

Program element	Description	Cost/year
Smart burning education and outreach	To inform the public on the impacts related to poor burning practices, actions they can take to improve local air quality, and the rules and guidelines identified in local and provincial air quality, wood burning appliance and open burning regulations.	\$15,000
Wood stove exchange rebate top-ups	Wood stove exchange program rebate top-ups for switch to cleaner heat sources. The amounts listed below would be in addition to the standard \$250 rebate funded by the provincial wood stove exchange program. <ul style="list-style-type: none"> <li>• 20 rebates at \$100 each for new EPA certified wood stoves</li> <li>• 10 rebates at \$250 each for EPA certified natural gas or pellet stoves</li> <li>• 6 rebates at \$750 each for electric heat pumps.</li> </ul>	\$9,000

This work plan will be focussed on residential wood heating activity, as it is the source with the largest degree of municipal control, and is closest to the places where people live, work and play. In regards to open burning, the largest open burning source identified in the emissions inventory is provincially regulated pile and area burns. This activity is regulated by the *Open Burning Smoke Control Regulation*, which has been under provincial review for several years. Proposed revisions include the establishment of three smoke sensitivity zones and increased setback distances. Of particular note, most of the Comox Valley will be included in the high smoke sensitivity zone, which will include a significantly shorter burn period than is currently permitted. The province is accepting comments regarding the latest regulation update intentions paper ([link](#)) that was released in April 2016. A draft letter expressing the CVRD board's support for the proposed regulatory changes is attached to this report for consideration (Appendix B).

The proposed work plan's initial focus on smart burning outreach and education will be developed with input from stakeholders. Gathering of stakeholders into an air quality management advisory committee is an option for future consideration as the proposed work plan rolls out.

#### **Recommendations from the Chief Administrative Officer:**

1. THAT a three year (2017-2019) air quality education and incentive program be implemented as described in the staff report dated May 10, 2017, funded with the Island Health Community Wellness grant received by the Comox Valley Regional District in 2016.
2. THAT a letter be sent to the provincial Ministry of Environment expressing the Comox Valley Regional District board's support for the proposed changes to the *Open Burning Smoke Control Regulation*.

Respectfully:

***D. Oakman***

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Debra Oakman, CPA, CMA  
Chief Administrative Officer

Prepared by:

***V. Van Tongeren***

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Vince Van Tongeren, B. Sc  
Policy and Sustainability  
analyst

Concurrence:

***M. Zbarsky***

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Michael Zbarsky, B.Sc. AScT  
Manager of Transit and  
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Concurrence:

***T. Ian Smith***

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T. Ian Smith, MCE  
General Manager of  
Community Services

Attachments: Appendix A – Draft communications plan for air quality outreach program  
Appendix B – Draft support letter for provincial *Open Burning Smoke Control Regulation*  
revisions

<b>Subject: Woodstove Smoke Education &amp; Outreach Communication Plan</b>	<b>File:</b>
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### **Purpose**

To provide education on smart burning practices, including backyard burning in rural areas as a secondary focus, and the Comox Valley Regional District's (CVRD) Woodstove Rebate Program over three years beginning in fall 2017, through advertising, media relations, community outreach and social media content.

### **Target Audience(s):**

- All residents within the CVRD. A particular emphasis is to reach:
  - Urban neighbourhoods where the homes were built prior to 1990 and are more likely to have older woodstoves
  - Older residents who have been using woodstoves for years with little to no current information on best practices for safe burning
  - Rural CVRD residents who use backyard burning as a disposal method for yard debris
  - Local home inspectors, WETT inspector and chimney sweepers who can educate new home owners
  - Partner retailers
- CVRD staff
- CVRD board

### **Project Background:**

- Approximately 20 to 30 per cent residents in the Comox Valley use woodstoves to fully or partially heat their homes. The smoke from residential woodstoves represents a significant cause of seasonal air quality issues affecting the region in the fall and winter.
- If residents follow safe burning practices, local air quality would improve to the benefit of all residents.
- New certified wood-burning appliances burn 30 per cent less wood, significantly reduce the risk of chimney fires and reduce smoke and particulate emissions by up to 70 per cent
- Switching to a newer model, high efficiency woodstove is a further step, which should be encouraged to residents because each switch is a step towards cleaner air for everyone in the region.
- The CVRD ran a Woodstove Exchange Rebate program in 2011, then gathered data over the following five years which supported a need to reintroduce the program in 2016 and 2017
- Open burning activity in rural and resource areas is a concern to residents. Rural residents have alternatives to backyard burning of yard debris.

### **Key Speaking Points:**

- Get an efficient fire every time. Avoid emitting excess smoke by using only dry wood, maintaining a clean fireplace and ensuring proper air flow.
- Use alternative heating sources on days with poor air quality ratings. Burning wood will add to the problem and make breathing hard for those with respiratory conditions.
- New certified wood stoves burn cleaner, more efficiently, and emit less pollution

- Backyard burning on poor air quality days is harmful to nearby residences

**Spokesperson:** Vince Van Tongeren

**Guiding Principles:**

- Communications included in all project team meetings and in key project-related discussions
- Communications designed to meet core target audience
- Project to have budget sufficient to cover communications strategies

**Situation Analysis:**

Strengths:

- Messaging on smart burning tips is not new, this communications campaign builds on earlier messages and reinforces the need for air quality improvement measures.
- A three-year campaign allows the CVRD to track changes over time in air quality and sentiment.
- The CVRD is aware of the core residential areas to target: urban areas with homes built before 1990 which have less efficient wood stoves.

Weaknesses:

- There is some discrepancy within the region regarding the cause for concern over air quality issues. Some residents remain to be convinced that changes are required.
- Many of the residents who are known to use woodstoves regularly to heat their homes are older residents and may not be regular internet or social media users.

Opportunities:

- The CVRD has partnerships with woodstove suppliers that can be leveraged.
- The CVRD could partner with local home inspectors who are able to educate new home owners on safe burning practices.
- The CVRD has numerous community outreach opportunities for educating the public on safe burning practices.
- Run a contest to win a high efficiency woodstove. Applicants must have an older model, low efficiency woodstove. The contest would promote changing to a high efficiency woodstove and encourage others those who don't win to take advantage of the woodstove exchange program.

Threats:

- Many of the target residents have been using woodstoves for decades and see no problem with the status quo.
- Residents within this community have a distrust of government, government spending, budget process, costs of running organization and misunderstanding of need/use.

**Communications Strategy/Tactics:**

<b>Timing</b>	<b>Tactics</b>	<b>Budget</b>
<b>Year One - 2017</b>		
Spring/Summer	<ul style="list-style-type: none"> <li>• Develop Communications Plan</li> <li>• Design of advertising &amp; brochure</li> <li>• Brochure printing</li> <li>• Develop social media strategy</li> </ul>	

	<ul style="list-style-type: none"> <li>• Outreach at events</li> </ul>	
Fall/Winter	<ul style="list-style-type: none"> <li>• Radio advertising (Goat FM &amp; Eagle FM)</li> <li>• Newspaper advertising (Comox Valley Record)</li> <li>• Brochure distribution</li> <li>• Public outreach</li> <li>• Smart burning workshop at fall home show</li> <li>• Workshop for home inspectors &amp; WETT inspectors</li> <li>• Contest for wood stove exchange participants</li> </ul>	\$14,415
<b>Year Two - 2018</b>		
Spring/Summer	<ul style="list-style-type: none"> <li>• Outreach at spring home show</li> <li>• Radio advertising (Goat FM &amp; Eagle FM)</li> <li>• Update advertising &amp; brochure (if required)</li> <li>• Brochure printing</li> <li>• Update social media strategy</li> <li>• Outreach at events</li> </ul>	
Fall/Winter	<ul style="list-style-type: none"> <li>• Radio advertising (Goat FM &amp; Eagle FM)</li> <li>• Newspaper advertising (Comox Valley Record)</li> <li>• Brochure distribution</li> <li>• Public outreach</li> <li>• Smart burning workshop at fall home show</li> <li>• Workshop for home inspectors &amp; WETT inspectors</li> <li>• Contest for wood stove exchange participants</li> </ul>	\$15,420
<b>Year Three - 2019</b>		
Spring/Summer	<ul style="list-style-type: none"> <li>• Outreach at spring home show</li> <li>• Radio advertising (Goat FM &amp; Eagle FM)</li> <li>• Newspaper advertising (Comox Valley Record)</li> <li>• Update advertising &amp; brochure (if required)</li> <li>• Brochure printing</li> <li>• Update social media strategy</li> <li>• Outreach at events</li> </ul>	\$15,420
Fall/Winter	<ul style="list-style-type: none"> <li>• Radio advertising (Goat FM &amp; Eagle FM)</li> </ul>	

	<ul style="list-style-type: none"> <li>• Newspaper advertising (Comox Valley Record)</li> <li>• Brochure distribution</li> <li>• Public outreach at events</li> <li>• Smart burning workshop at fall home show</li> <li>• Workshop for home inspectors &amp; WETT inspectors</li> <li>• Contest for wood stove exchange participants</li> </ul>	
	<b>TOTAL:</b>	<b>\$45,255</b>

**Next Steps:**

- Implementation of communication plan and education pieces, pending board approval

**Approval History**

Created by: Linda Munro, Moonraker PR	April 28, 2017
Amended:	



**Office of the Chair**

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BC Ministry of Environment  
Environmental Standards Branch  
PO Box 28159 Westshore RPO  
Victoria, BC V9B 6K8

**Re: Proposed Changes to the Open Burning Smoke Control Regulation**

The Comox Valley Regional District (CVRD) wishes to thank the Ministry of Environment (MoE) for the opportunity to review and provide comment on the proposed changes to the Open Burning Smoke Control Regulation (OBSCR). At this time, air quality is a pertinent issue in the CVRD, with the latest air zone reporting from the BC air quality management system identifying local exceedances of annual and 24 hour Canadian Ambient Air Quality Standards for fine particulate matter (PM<sub>2.5</sub>).

The CVRD is in support of many of the proposed changes to this regulation, including the establishment of three smoke sensitivity zones that further restrict open burning activities on lands near populated areas, increases to setback distances that will further restrict open burning activities to larger rural properties, and the inclusion of best management practices relating to moisture management. The CVRD's understanding, in discussion with staff at the MoE, is that most of the populated areas of the CVRD will be within the high smoke sensitivity zone. To confirm this, the CVRD is requesting a map of the proposed smoke sensitivity zones within the CVRD be provided.

Recent local events suggest there is limited public awareness of OBSCR, the types of burning activities it regulates, and the proper process for reporting suspected violations. This lack of awareness often results in calls to local government offices, and significant staff time spent in responding to these calls. It is the CVRD's expectation that informing the public of and enforcing OBSCR be sufficiently resourced by the Ministry of Environment.

Of larger concern to the CVRD is the question of whether open burning of vegetation such as land clearing and forestry debris is the best use of this material. In the Comox Valley, municipal yard waste collection programs and Comox Strathcona waste management facility diversion programs see vegetation material put to use as compost amendment or biofuel. Further supporting this position, a resolution seeking better use of wood debris from forestry operations within community airsheds was endorsed at the 2016 Union of BC Municipalities Convention. This position is also supported by one of the recommendations of the BC Climate Leadership Team to increase utilization of forest residue for energy purposes.

Sincerely,

Bruce Jolliffe, Chair