



April 6, 2025

City Council  
City of Prince George  
1100 Patricia Blvd, Prince George,  
BC V2L 3V9

**Re: Public Hearing Comments on City of Prince George Draft Official Community Plan**

Dear Mayor and Council,

The Prince George Air Improvement Roundtable (PGAIR) thanks you for the opportunity to review and provide comments as part of the public hearing process for the City of Prince George's (City's) draft Official Community Plan (OCP). While PGAIR is pleased to see some important air quality policies included in the draft (pending approval) OCP, overall, PGAIR is concerned about the downgrading and dilution of air quality objectives and policies in the draft OCP compared to the current OCP (enacted in 2011). Improving air quality is a key goal in the current and past OCPs as well as the myPG Sustainability Plan, and it **should remain a key goal** in the draft OCP **because of the current state of the airshed and because air quality is intricately linked to many of the City's other desired goals**. This is discussed below.

Based on the available data (and despite successes in improving air quality over the years), the Prince George airshed **currently exceeds provincial and national air quality objectives for particulate matter (PM)**<sup>i</sup>. Poor air quality (elevated PM levels) presents one of the greatest environmental risks to human health<sup>ii</sup>, (as it impacts the entire body, not just the respiratory system) and limits outdoor opportunities (including active transportation and recreation in parks and green spaces). Poor air quality also negatively impacts the economy<sup>iii</sup> (including through increased sick days and reduced employee recruitment and retention) and Prince George's identity and pride. The draft OCP's focus on infill development may further increase levels of PM and residents' exposure to PM if unintended consequences are not mitigated<sup>iv</sup>. For instance, infill can reduce urban sprawl and traffic pollution and increase active transportation, but it can reduce overall greenspace and the co-benefits for air quality<sup>v</sup> and other important outcomes such as extreme heat.

Air quality and climate change are closely linked. Climate change exacerbates poor air quality, including through increased wildfire frequency and severity. Many sources of PM are also sources of greenhouse gases (GHGs) and improving air quality and reducing GHGs *often* aligns, meaning that policies that enhance one can benefit the other (this is referred to as co-benefits). Advancing co-benefits is included in the current OCP and presents an opportunity for the City to efficiently and effectively utilize its resources and capacity to achieve broader environmental and social health and wellness goals. For example, creating and/or maintaining a diversity of green space and a variety of tree canopy coverage not only helps combat climate change but also improves air quality, enhances biodiversity, and provides recreational spaces for communities which, in turn, improves individual wellness overall. However, it is important to understand and differentiate between actions that result in co-benefits to air quality and climate change (such as reducing fossil fuel use) and actions that may benefit climate change but negatively affect air quality (such as direct biomass burning).

To help the City achieve its desired goals in the draft OCP with respect to air quality, social health and wellbeing, infill development and complete communities, the economy, identity and pride, and climate change, PGAIR makes the following recommendations for the draft OCP (please see the attached Schedule A for specific recommended wording):

- Air quality should be included as a **key community goal** (like the current OCP), climate change will continue to exacerbate air quality risks<sup>vi</sup>;
- **Transportation objectives** should include policies to reduce people’s exposure to traffic-related air pollution such as allowing for adequate separation and setbacks from emissions sources;
- **Air quality objectives should specify PM** (like the current OCP) and should include policies to:
  - Promote climate change **co-benefits** (like the current OCP) (this can also be enhanced in Climate Action and Resilience objectives);
  - Manage air emissions from **transportation** and **residential wood burning** (similar to the current OCP), which are key sources of PM in the airshed;
  - **Manage dust** (like the current OCP), as it is a leading trigger of local air quality advisories in the Spring;
- **Natural hazard objectives** should include a policy to manage the risk of wildfires (like the current OCP), as wildfire smoke generally is a leading trigger of local air quality advisories in the summer,
- Air pollution mitigation (e.g., vegetation barriers) should be considered in new and existing development, and
- **Future Industrial Land Use objectives** should include a policy to encourage new and existing heavy industry to reduce their PM emissions including through adoption of best available control technology during expansions or upgrades.

PGAIR values the long-standing relationship we have with the City of Prince George and the **common goals we share** for a **healthy community** and **social well-being**.

Thank you for the opportunity to provide further input into the City’s draft Official Community Plan. Please reach out to me should you have any questions or require additional information.

Sincerely,



Patience Rakochy RPF MSc

Regional Program Manager (Climate Change & Air Quality)

Fraser Basin Council

Director – PGAIR

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<sup>i</sup> [Prince George Air Quality Emissions and Modelling \(February 2021\)](#)

<sup>ii</sup> WHO: [Environment, Climate Change and Health](#); Health Canada: [Health impacts of air pollution in Canada in 2018 - Canada.ca](#)

<sup>iii</sup> [Economic issues of air pollution - Canada.ca](#)

<sup>iv</sup> 2023: [Densification versus urban sprawl. Modeling the impact of two urban growth scenarios on air quality - ScienceDirect](#)

<sup>v</sup> 2021: [How can vegetation protect us from air pollution? A critical review on green spaces' mitigation abilities for air-borne particles from a public health perspective - with implications for urban planning - ScienceDirect](#)

<sup>vi</sup> : [UBC School of Community and Regional Planning \(SCARP\) and PGAIR - Advancing Air Quality and Climate Co-Benefits in the Prince George Airshed \(2023\)](#)

## SCHEDULE A

### PGAIR RECOMMENDATIONS FOR DRAFT OCP

*Selected relevant provisions of the City's draft Official Community Plan (OCP) are reproduced below in black (with page numbers in blue). PGAIR recommendations are indicated in red, and recommended objectives or policies found in the current OCP are indicated in red underline.*

#### 2.2 Our Community's Goals (at 10-11)

To realize the community's 2025 vision statement, the OCP seeks to achieve five (5) long-term goals for Prince George. The proceeding objectives and policies outlined in this Plan align with these goals.

5. We are an environmentally conscious and responsible City, with **air quality and** climate protection, mitigation and adaptation integrated into our approach to **and decisions on** land use, servicing, development and transportation.

#### 12.0 Transportation and Mobility (at 34)

##### **12.1.1 Objective**

Create an environmentally, socially, culturally and economically sustainable transportation system.

##### **12.1.2 Policies**

- a. Prioritize updating **and implementing** the active transportation plan, informed by the population, household and employment forecasts as well as growth management policies of this Plan.

##### **12.1.3 Objective**

Connect our city with safe, comfortable and efficient active transportation networks.

##### **12.1.4 Policies**

- a. Design streets to accommodate various combinations of transportation modes recognizing the role streets play in supporting key transportation networks (e.g. active transportation, frequent transit). Designs should also prioritize efficient movement of people over vehicles to optimize future network capacity. **Design active transportation to reduce people's exposure to traffic-related air pollution by considering routes, physical separation, or vegetation to filter pollutants.**

#### 16.0 Natural Environment (at 44)

##### **16.1.7 Objective**

Local air pollution and people's exposure to air pollutants, **especially particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>)**, is reduced.<sup>i</sup>

##### **16.1.8 Policies**

- a. Collaborate with relevant agencies and organizations such as the Prince George Air Improvement Roundtable and take a proactive role to advance airshed research, education, best practices, best available technology,<sup>ii</sup> and planning initiatives such as airshed management plans.<sup>iii</sup>

- b. Encourage **new** land uses that accommodate vulnerable populations (e.g., seniors, children, people with health challenges) to locate away from major **existing** point sources of air pollution, such as industry. **If not feasible, consider building design features that will reduce exposure to pollutants, such as placement of air intakes or additional air filtration.**
- c. Promote land uses and settlement patterns that reduce reliance on motor vehicles. Continue to support anti-idling and consider enacting an anti-idling bylaw.<sup>iv</sup>
- d. Limit new development (especially residences, day care facilities, schools, hospitals, medical clinics, and long-term care facilities) within 150 m of busy roads (roads with more than 15,000 vehicles/day based on annual daily average traffic counts).<sup>v</sup> Encourage new and existing development to reduce exposure to exhaust pollutants from motor vehicles or traffic related air pollution. Consider routes, physical separation, or vegetation to filter pollutants from highways, land uses and activities that require idling (e.g., drive-thrus).
- e. Continuously improve the application and removal of winter traction material on municipal streets to minimize road dust (subject to safety considerations),<sup>vi</sup> conduct early and more frequent sweeping of municipal streets,<sup>vii</sup> and establish guidelines and standards of paved commercial and public parking lots to mitigate dust from sweeping.<sup>viii</sup>
- f. Discourage the installation in new buildings of woodburning appliances as a primary source of heating. Continue to work with the Prince George Air Improvement Roundtable to promote the exchange of older woodburning appliances in the airshed to those meeting CSA/EPA standards for emissions.<sup>ix</sup>
- f. Review and update the Clean Air Bylaw as information, technology, practices and standards change and improve.
- g. Continue to promote programs, policies and decision-making that achieve net benefits (co-benefits) to air quality and climate change.<sup>x</sup>

## **17.0 Natural Hazards** (at 45)

### **17.1.1 Objective**

Risk to **air quality**, public safety, property and infrastructure from natural hazards is reduced.<sup>xi</sup>

### **17.1.2 Policies**

- h. Continue to reduce the risk of fires in the interface<sup>xii</sup> and continue to work with the appropriate agencies and personnel to develop strategies and partnerships to reduce the risk of wildfire entering the city's boundaries from areas outside municipal boundaries.<sup>xiii</sup>

## **18.0 Future Land Use Plan** (at 46)

### **18.12.1 Policies**

- i. Encourage existing heavy industry to reduce environmental impacts, with an emphasis on air emissions.<sup>xiv</sup> Encourage existing heavy industries undergoing expansions or upgrades to use best available pollution control technologies and other measures to reduce air emissions.<sup>xv</sup>

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- <sup>i</sup> The current OCP recognizes particulate matter as the primary pollutant of concern (at 31)
  - <sup>ii</sup> Current OCP, policy 6.1.3
  - <sup>iii</sup> Current OCP, policy 6.1.4 and page 15
  - <sup>iv</sup> Current OCP, policy 13.2.39
  - <sup>v</sup> Current OCP, policy 13.4.2
  - <sup>vi</sup> Current OCP, policy 13.3.1
  - <sup>vii</sup> Current OCP, policy 13.3.2
  - <sup>viii</sup> Current OCP, policy 13.3.12
  - <sup>ix</sup> Current OCP, policy 13.5.1
  - <sup>x</sup> Current OCP, policy 6.1.6
  - <sup>xi</sup> Current OCP, objective 6.4.9 contains a similar objective
  - <sup>xii</sup> Current OCP, policy 13.3.24
  - <sup>xiii</sup> Current OCP, policy 6.4.67
  - <sup>xiv</sup> Current OCP, objective 8.3.24
  - <sup>xv</sup> Current OCP, policy 8.3.109