

**From:** SMIN.Minister@gov.bc.ca  
**Subject: Ref No 51862 - Lehigh: Texada South Quarry. Submission and Request.**  
**Date:** 19 January 2010 23:28:48 GMT  
**To:** rickyfletch@gmail.com  
**Cc:** EMPR.Minister@gov.bc.ca, ENV.Minister@gov.bc.ca, [FOR.Minister@gov.bc.ca](mailto:FOR.Minister@gov.bc.ca),  
Ron.Bronstein@gov.bc.ca

Mr. Richard Fletcher  
Friends of Davie Bay

Email:[rickyfletch@gmail.com](mailto:rickyfletch@gmail.com)

pc: [EMPR.Minister@gov.bc.ca](mailto:EMPR.Minister@gov.bc.ca)  
[ENV.Minister@gov.bc.ca](mailto:ENV.Minister@gov.bc.ca)  
[FOR.Minister@gov.bc.ca](mailto:FOR.Minister@gov.bc.ca)  
[Ron.Bronstein@gov.bc.ca](mailto:Ron.Bronstein@gov.bc.ca)

Dear Mr. Fletcher:

Thank you for the copy of your emails of December 31, 2009 and December 22, 2009 concerning the Texada South quarry application from Lehigh Northwest Materials Ltd. (Lehigh). As Minister of State for Mining, I am pleased to address your concerns.

In your email, you raise the matter of productive capacity and thresholds. The Texada South Quarry Mine Plan, prepared by Lehigh, proposes a production level below the threshold in the Reviewable Projects Regulation of the Environmental Assessment Act. I believe the Environmental Assessment Office has communicated with you on this matter, confirming the project will not be required to undergo an environmental assessment.

In regard to karst, in addition to the information provided by the applicant and others on the karst potential of the area, a map reserve was recently established over a cave system along the confluence of Stromberg and Lower Gro-Op creeks, approximately 450 metres from the proposed quarry area. A Ministry of Forests and Range (MFR) geologist with background in karst management assisted the Ministry of Energy, Mines and Petroleum Resources (MEMPR) in conducting a field review of the area. This information will assist the Ministries' decision makers in assessing the karst system and potential, if any, for sub-surface hydrological connections between the quarry area and cave system.

The Mines Act requires that a reclamation plan is part of an approved mine plan, along with the requirement for reclamation security in a form and amount approved by the Government. The requirement for reclamation security is to relieve taxpayers of long term obligations, should a mining company cease to exist. However, the "polluter pays" principle is a policy of the Government and, therefore, outstanding environmental obligations would have to be met by corporations, or their subsidiaries, doing business in the Province.

The other matters on economic and stewardship issues are largely a matter of subjective opinion. I wish to point out that the area in question consists of upland areas of both fee simple parcels and a mining lease on Crown land held by Lehigh. This upland area is zoned for resource

extraction by the regional district. As part of their review, MEMPR staff have met with representatives from the local government and local First Nations to discuss the project, its implications and impacts.

The aggregate sector in British Columbia continues to be a viable and important industrial sector, particularly on the south coast. A significant volume of aggregate and industrial minerals are produced each year. Transportation to various destinations using barges has been a safe and efficient method. The aggregate industry is well aware of the implications of their greenhouse gas emissions and the targets set by the Government in the Climate Action Plan. We continue to work with the industry to address this important environmental issue, these products are necessary to maintain critical public and private infrastructure, and lime is an important filter used for mitigating industrial emissions and in environmental remediation.

Mr. Ron Bronstein, Regional Director, Southwest Region, Mining and Minerals Division, is responsible for permitting mining operations in this area, and I have forwarded your concerns to him for consideration. If you have additional questions or require further information, Mr. Bronstein can be reached at 250-952-0473 or [Ron.Bronstein@gov.bc.ca](mailto:Ron.Bronstein@gov.bc.ca).

Thank you for taking the time to provide input into this application.

Sincerely,

Original Signed By

Randy Hawes  
Minister of State for Mining

-----Original Message-----

From: Richard Fletcher [<mailto:rickyfletch@gmail.com>]

Sent: Thursday, December 31, 2009 9:58 AM

To: Minister, ENV ENV:EX; Minister, EMPR EMPR:EX; [jim.prentice@ec.gc.ca](mailto:jim.prentice@ec.gc.ca);

Thomson.MLA, Steve LASS:EX; Minister, SMIN SMIN:EX; Minister, FOR

FOR:EX; [mintc@tc.gc.ca](mailto:mintc@tc.gc.ca); [Shea.G@parl.gc.ca](mailto:Shea.G@parl.gc.ca)

Cc: OfficeofthePremier, Office PREM:EX; Min XNCR; Christie, Karen L

EAO:EX; Douglas, Ross T ILMB:EX; Taje, Eddy EMPR:EX; Linda Sullivan;

Scott Northrup; Cowgill, Andrea N ILMB:EX; [sislerr@tc.gc.ca](mailto:sislerr@tc.gc.ca); Nicholas

Simons; Scott Fraser; [Weston.J@parl.gc.ca](mailto:Weston.J@parl.gc.ca); PAUL GRIFFITHS; Peak Editor;

[LPynn@vancouver.sun.com](mailto:LPynn@vancouver.sun.com)

**Subject: Lehigh: Texada South Quarry. Submission and Request.**

**Reference: CEAR 09-01-49595 and BC references.**

Please find attached a submission dated Dec 31-09 in response to developments and correspondence.

For reasons given in this submission, Friends of Davie Bay request:

- 1 Minister Penner declare the Texada South Quarry as a Reviewable Project
- 2 That a full karst assessment be authorized by the BC Government so that the feature of the karst can be understood and mitigation strategies developed
- 3 That the DFO find that the barge loadout facility and quarrying activity will cause a HADD in the rockfish conservation area of Davie Bay, and consequently must conduct an assessment under the Canadian Environmental Assessment

The attachments form part of the submission

We look forward to your response

Yours truly,

Richard Fletcher  
Friends of Davie Bay  
<http://daviebay.com/>