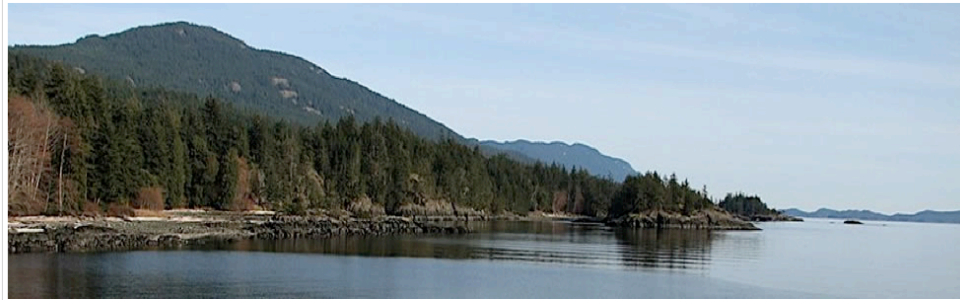


F R I E N D S O F D A V I E B A Y .



BY E-MAIL TO

Hon. Barry Penner,	Minister of Environment, BC
Hon Blair Lekstrom,	Minister of Energy, Mines and Petroleum Resources, BC
Hon. Steve Thomson,	Minister of Agriculture and Lands, BC
Hon Pat Bell	Minister of Forests and Lands BC
Hon Randy Rawes.	Minister of State for Mining BC

February 3, 2010.

Dear Sirs

I am writing in response to a note received from Randy Hawes, Minister of State for Mining, dated January 19, 2010.

1 The Texada South Quarry is a Reviewable Project.

1-1 The application documents indicate that a ramp 1.8 meters wide is to be constructed with a loading rate of 2,500 tonnes per hour capable of servicing a quarry extending over considerable acreage. Assuming economic operation at 5 days a week using one shift, means the production capacity could exceed 5 million tonnes per annum. Global aggregate companies must seek economies of scale from individual facilities in order to remain competitive.

1-2 Under Part 3, table 6 of the Reviewable Projects Regulation (the "Regulation"), an Environmental Assessment is required in BC for a new Construction Stone and Industrial Mineral Quarry if during operations the quarry will have an annual production capacity of greater than or equal to 250,000 tonnes of quarried products. Hence, based on the capacity installed, regardless of the production rate conceded by the applicant, Minister Penner has a legal duty to conduct an Environmental Assessment under the Act.

2 A full karst assessment of the Crown lands above Davie Bay is essential

2-1 Minister Penner indicates a reason not to conduct a full Environmental Assessment is that the MEMPR will address all the impacts including potential effects on the cave and karst system. We are told that the ILMB are committed to the protection of this geological system.

2-2 We understand 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 field review took one day and there were 6 observations made during the field review. One observation was the option at some point of using dye tracing to track the hydrology.

2-3 The Minister has indicated that research will be carried out to 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. Friends of Davie Bay anticipate the field review to be the precursor of a full and complete cave and karst assessment, using the "total catchment" approach, conducted by karst professionals and tested by peers.

2-4 Paul Griffiths has written to MEMPR asking for a dye tracing study as this could reveal not only the subsurface flow paths, but also the general aquifer conditions and rate of water movement in the karst unit. He states that it is likely that the karst in the proposed quarry site is mainly recharged by direct infiltration of precipitation through the network of joints and fissures, and that these karst waters will move down gradient and then circulate into a deeper part of the groundwater system that may or may not be connected to the caves systems and springs below.

To be credible and acceptable, and to help inform the more complete karst assessment in the area, he states that the dye tracing must be directed and carried out by qualified karst resource specialists who have experience in completing and interpreting the results of karst assessments. Professional advice and input would also be sought as needed, from the pool of karst hydrogeologists and other karst specialists with prior experience in dye tracing and recharge area delineation in forested karst systems in coastal BC.

http://members.shaw.ca/pgriff/Taje_letter_100130.pdf

2-5 The ILMB has drawn up a provisional Section 16 map reserve of 7.8 hectares in the centre of DL 589 to protect the sensitive karst. Lehigh has now withdrawn all of DL 589 from its application, so we can presume now that the protected area has grown to 35 hectares. However without a full assessment the Province will be in no position to understand the delineation of the karst unit and the value of what is "there". The Power River Regional District (motion dated Dec 16, 2009) recognizes the caves and karst at Davie Bay as "an island jewel" and has emphatically requested that a karst assessment be carried out by a qualified karst professional.

The Davie and GO/Stromberg creeks, along with the low saddles of wetlands, constitute a large karst drainage system and bring clean, filtered freshwater onto the beaches. The dikes of magma rock mixed in with the limestone essentially create an aquifer for the whole area. Removing the upper ridge of limestone will definitely affect the way water enters into and behaves in that aquifer, and impact most severely on the critical marine habitat in the Bay.

3 Summation

Friends of Davie Bay are asking Minister Penner to recognize the scale of the Texada South Quarry and its impact on the sensitive eco-systems in and around Davie Bay, including the caves and karst and the marine habitat, its impact on the Georgia Strait and the socio-economic impact on Texada. For these reasons Friends are asking Minister Penner to declare the project Reviewable.

Full appreciation of the value of the substantial cave and karst system is essential, as is recognition and protection of the critical marine habitat in the Bay. Disturbance of the cave and karst above Davie Bay would affect the way water enters into and behaves in that aquifer, and impact most severely on the water quality

entering the Bay.

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