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Subject: **Texada South Quarry. Reply**
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Dear Karen.

Thank you for taking the time to respond to me and to summarise the BC EAO's position with respect to a Review of the Texada South Quarry. For ease of reference I have attached John Mazure's letter dated Dec 15-09, which you refer in your e-mail, and your letter of Feb 16-10.

Since my e-mail of February 3-2010, Friends of Davie Bay have presented to Transport Canada which is the agency responsible for the federal review under CEAR reference 09-01-4959. The presentation can be found, with our other submissions at <http://www.daviebay.com/submissions/>

Subsequent to that meeting Friends of Davie Bay have written to Canadian and BC Ministers summarising points made then and previously, so that Transport Canada is able to evaluate its position. I am not sure whether these facts represent new information, but I would be grateful if you could bring these to Minister Penner's attention.

Scale of the Quarry

Friends of Davie Bay have repeatedly pointed out the scale of the Texada South Quarry. The application states the works will extend to 75 hectares, and the limestone reserves are greater than 100 million metric tonnes. The conveyor or ramp is to be 433 meters in length, 1.8 metres wide, 7 meters in height, spanning the causeway across Davie Bay and tidal island at its crest. It concedes a loading rate of 2,500 tonnes per hour. Clearance for the conveyor would be approximately 6 meters, and it would entail the building of several pylons to support the structure.

Based on the permitted 240,000 tonnes per annum, and 100m tonnes reserves, the quarry's life is over 400 years!!

It is abundantly clear to most that the capacity of the facility is well in advance of conceded 240,000 tons annual production rate. Based on just one shift operating for 8 hours per day, the quarry would have a production rate of 4.8m tonnes per year (8 x 2,500 x 5 x 48) assuming taking 4 weeks holiday in the summer.

Friends of Davie Bay have pointed out to Transport Canada that given the facts contained in the application on the capacity and size of the proposed quarry, and the business practices of the global aggregates companies, that the Texada South Quarry falls within the definition of the Comprehensive Study List Regulations. Consequently the CEAA must proceed by comprehensive study rather than screening and public participation is mandatory per s.21 of CEAA.

Public Safety

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. This means that blasting will now occur just

300 meters from a cave opening with consequential risk to public safety and the structure of the karst (through seismic impact),

Alternative, more economic resources

Lehigh could obtain rock on Texada of the type they propose to mine at Davie Bay more economically using one or more of alternative sources, where an existing loading dock is available:-

1--The waste rock stockpiles of the existing limestone quarries on Texada. This is a low capital cost source for Lehigh as the stockpiles consist of many millions of tonnes of mined rock resting on the land surface over many hectares of land adjacent to the 3 open and 1 closed mines on the northern part of Texada. The stockpiles are within a kilometre or so of 3 operating barge loading docks and 2 that are closed down now, but might be reopened after renovation. At a rate of production of 240,000 tonnes per year these stockpiles will last for more than 50 years.

2-- By purchases of suitable rock from the operating quarries on Texada. One of these, the Blubber Bay quarry of Ashgrove Cement, has sufficient unused capacity to mine and load onto barges more than one million tonnes per year. This option would involve very minimal capital investment by Lehigh or the company from which the rock is purchased.

3-- Lehigh have extensive land holdings on Texada and at Blubber Bay. These holdings have substantial reserves of limestone and other rocks. It's derelict dock at Bubber Bay could be rebuilt and used to load the aggregate from a new quarry. The reconstruction of the dock and the development of a new quarry and crushing facilities would involve capital expenditures no more than those required for the Davie Bay project.

Plans for public use and conservation.

There are alternative use plans to develop Davie Bay as a marine park, to protect the caves and karst, and create a caves/karst educational center destination site. Afterall, Davie Bay is a most picturesque area of Texada with access to the water, and before purchased by Lehigh the foreshore and bay areas hosted a community campground and public amenities. There would be considerable interest in securing the Davie Bay area for public and community use, which would be the highest and best use of the crown land.

It is within BC Minister Penner's prerogative to call in the Texada South Quarry as a Reviewable Project. This is a step which we encourage the Minister to take and to join with the Canadian Environmental Assessment Office in a full review of the environmental, socio-economic and public interest issues concerning this application.

I look forward to your reply

Best regards

Richard Fletcher
for Friends of Davie Bay.