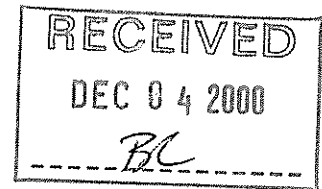


Nahanni National Park Reserve  
PO Box 348, Fort Simpson, NT  
X0E 0N0



1 December, 2000

Mackenzie Valley Environmental Impact Review Board  
200 Scotia Centre, PO Box 938  
Yellowknife, NT  
X1A 2P6

Attn: Luciano Azzolini

**RE: Terms of Reference - Canadian Zinc (CZN) Development Proposals**

Dear Mr. Azzolini,

Please find comments attached regarding the Terms of Reference, and Work Plan for the two Canadian Zinc proposals: Cat Camp / Fuel Cache Retrieval, and Diamond Drilling Program.

If there are any further questions, please contact our office at (867)695-3151, or (867)695-2446 (Fax).

Sincerely,

*Original signed by:*

Chuck Blyth  
Superintendent, Nahanni National Park Reserve

Prepared by:  
Douglas Tate  
Conservation Biologist  
Nahanni National Park Reserve



**Comments on:**

**Environmental Assessment Work Plan and Terms of Reference  
Land Use Permit Application MV2000C0030  
Cat Camp / Fuel Cache Retrieval and Cleanup  
Prairie Creek Mineral Exploration**

**1 December, 2000**

Prepared for:

Mackenzie Valley Environmental Impact Review Board

Prepared by:

Parks Canada, Nahanni National Park Reserve

Parks Canada (Nahanni National Park Reserve) is pleased to see that the MVEIRB has elected to separate the two project proposals put forth by Canadian Zinc Corporation (CZN), as these are very different projects requiring independent consideration.

The Work Plan developed by the MVEIRB is a good clarification of how the assessment will proceed and the responsibilities of various parties. There is one error noted. In the Work Plan, Section 3.1 states that the mineral exploration project will include "*access to drill locations by existing network of tote roads*", thereby inferring that there will be no new creation of roads. However, the application by CZN states they will create new roads where required, with no indication of number and extent of roads, slope, stream crossings, etc.

In the Appendix to the Work Plan, Parks Canada is of the opinion that the lack of a definition of cumulative effects is a potentially serious oversight. The assessment and management of cumulative effects is of increasing concern in the Northwest Territories, as evidenced by the commitment of the federal government to develop a Cumulative Effects Assessment and Management Framework (CEAMF) for the NWT. An appropriate definition would assist in defining the scope of the assessment of these two projects currently under review. The CEAMF uses the following definition:

*" 'Cumulative effects' can be defined as changes to the environment caused by the combination of past, present and 'reasonably foreseeable' future actions. 'Environment' is broadly defined to include not only the natural or biophysical environment, but the social, economic and cultural aspects also."*

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An additional definition / clarification which could be beneficial in the Work Plan, and/or TORs, is an explanation of the thresholds of public concern and environmental impact used to determine the suitability of a project. As noted in the Work Plan, the MVRMA states that the process shall “*ensure that the concerns of aboriginal people and the general public are taken into account*” and that the process shall have regard to “*protection of the environment from the significant adverse impacts of proposed developments*”. Are there levels of public concern and adverse impacts beyond which a project will not be permitted to proceed, and are those publicly available?

Otherwise the Work Plan appears to be complete. Comments on the draft Terms of Reference for each of the two projects are attached.



**Land Use Permit Application MV2000C0030**  
**Cat Camp / Fuel Cache Retrieval and Cleanup**

An initial concern of Parks Canada relates to the legal principles set out in the Work Plan, Appendix 1, Section 1.1. The second stated principle is the rule against bias, or prejudging a case. The manner in which the Terms of Reference (TOR) for both projects are written suggest that the MVEIRB has already decided to allow the proposed developments to go ahead. The TOR documents appear to address only mitigations, rather than the basic question of whether the projects should or should not proceed.

An example is Section 4.1.7 Land Use in the Fuel Cache Retrieval TOR. This section asks the developer to: "*explain and report what efforts are being made to keep the impact to the environment to a minimum on the Karst portion of the tote road*". If there is to be no bias, real or perceived, the TOR must ask what efforts *would* be used *if* a permit were to be issued.

Some aspects of the TOR, specifically in regards to 1. the assessment of cumulative effects, and 2. provision of supporting documentation of proposed mitigation measures, are lacking or only weakly referred to. These are addressed more fully in the comments on the Mineral Exploration (Drilling Program) TOR, but certainly apply to this project as well.

Parks Canada is pleased to see that the TOR does include a section for the proponent to specifically address Alternatives (Section 4.1.6), including completion of the fuel cache removal using a winter road.





**Land Use Permit Application MV2000C0030  
Mineral Exploration Program**

Under Section 2.1, the TOR states that the application is “*on land for which active mining leases exist*”. Parks Canada was informed that the lease for the Prairie Creek site was in fact expired, and should therefore be subject to the process for a new lease application. Clarification of this point would be appreciated.

In Section 2.2.1, the TOR states that the drilling program only requires “*Use of an existing tote road to access the drill sites*”. However, the project description from CZN indicates that new exploratory roads will be created where needed, with no indication of the length, number of roads, number of stream crossings, or other details. Also in Section 2.2.1, the TOR states that there will be “*Use of water from a local water supply for drilling purposes*”. Does this activity require a water license? It is recommended that the developer be required to specifically state how wastewater will be treated and disposed of, and whether the source, disposal site is fish habitat.

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Despite the fact that it has never been a commercial operation, there have already been significant environmental impacts at the Prairie Creek site. The area is already heavily impacted with an extensive network of bulldozer roads with numerous creek crossings, underground exploration shafts, tailings and tailings containment ponds, an airstrip, old buildings in various states of disrepair, fuel caches, barrels, scrap metal and other industrial waste. The effect of these existing impacts must be considered in addition to the proposed new activities.

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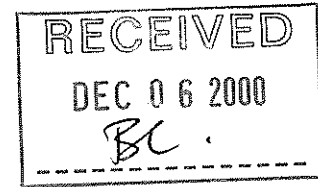
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