CANADA'S NATIONAL PARKS AND NATIONAL HISTORIC SITES

LES PARCS NATIONAUX ET LES LIEUX HISTORIQUES NATIONAUX DU CANADA

# FACSIMILE

# TÉLÉCOPIE

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From / De: DOUGLAS TATE

Date: 28 MAY

Pages: 3

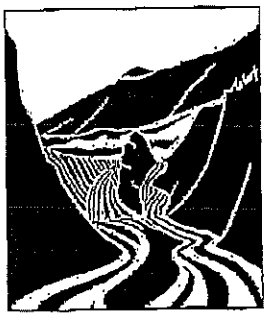
Message

LOUIE,

A FAX OF THE ORIGINAL LETTER SENT EARLIER TODAY BY EMAIL. FOR YOUR RECORDS.

DOUG.

RECEIVED
MAY 29 2001
PBL



Parks Canada / Parcs Canada

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

28 May, 2001

Luciano Azzolini
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
Box 938, 200 Scotia Centre
Yellowknife, NT
X1A 2N7

**Re: Draft Work Plan & Draft Terms of Reference for the Environmental Assessment of the Canadian Zinc Corporation Phase II Drilling Development**

Dear Mr. Azzolini,

Comments on the Draft Work Plan and Draft Terms of Reference for the above-noted assessment are included, as per your request. The opportunity to comment is appreciated, and we hope these recommendations will assist the Review Board in carrying out its duties in this assessment process.

**4 EA Process**
*4.2 EA Work Plan Schedule*

The timeline for this EA still appears inadequate for proper assessment, as noted in our earlier comments. Only one week is allotted to review the EA report and submit Information Requests, one week to prepare Information Request responses, and one week for preparation of technical reports following submission of these responses. Considering that June is a time of year when people in the field of resource management spend significant amounts of time away from the office in the field, this timeline will not allow for the highest quality of assessment work to be done.

**6 Scope of the Assessment**

In the previous comment period, the extent to which the Review Board was relying on previous submissions by the developer was not fully realized. Table 3 indicates that the Review Board



Canada

considers previous information provided, presumably in the project description and previous EA reports by the developer, to be adequate for the entire assessment in all categories other than cumulative impacts and provision of an environmental management plan. The information from these sources was, in the opinion of Nahanni National Park Reserve, inadequate to assess the previous 6-7 drill core application, let alone a project of ten times the magnitude. More information will be required from the developer to allow the Review Board to undertake an assessment as required by ss. 117(2).

Under the first section, '*Existing Environment*', the majority of the previously provided information on vegetation and plant communities, water quality, aquatic resources, wildlife and wildlife habitat is approximately 20 years old, and some previous reviews of this information considered it inadequate at the time. Information on terrain resources was found to be inadequate in a previous assessment of an EA Report by the developer at the same site. There was also an obvious deficiency in information regarding migratory birds using the area of the proposed activity, which was identified by Nahanni National Park Reserve in a previous EA process, and which has not been rectified to our knowledge. More current and comprehensive information will need to be provided by the developer to satisfy requirements of the EA Report as described in section 7 (#5).

In previous EA reports the developer did not provide support for claims regarding the absence or insignificant nature of impacts. Rather, impacts were presumed to be negligible with no supporting evidence. Supporting information was also lacking on the efficacy of mitigation measures proposed. These items are to be required in an EA Report as described in this draft Work Plan section 4.1.6 (bullet 11), and again in section 7 (#11). For this reason, the existing information cannot be considered acceptable to assess the '*Potential Impacts and Predicted Residual Impacts after Mitigation*'. The developer needs to provide more information and supporting evidence of their claims under several categories in this section.

If you have any further questions, please contact our office at 867-695-3151.

Sincerely,

Charles Blyth,
Superintendent
Nahanni National Park Reserve