

EA0405-002



AUG 24 2005

Mr. Martin Haefele  
Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
PO BOX 938, 5102 - 50TH AVE  
YELLOWKNIFE NT X1A 2N7

Dear Mr. Haefele:

**EA0405-002 CZC Phase III - Response to the Round Two Information Request**

Enclosed are the Government of the Northwest Territories responses to Information Requests 9 and 14 issued by the Mackenzie Valley Environmental Impact Review Board.

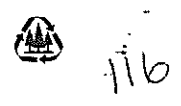
Should you have further questions or requests please contact Mr. Paul Cobban, Environmental Assessment Analyst at (867) 920-6106 or paul\_cobban@gov.nt.ca.

Sincerely,

for R.P. Bailey  
Deputy Minister

Enclosure

RECEIVED  
10:46 am 022  
AUG 24 2005  
MACKENZIE VALLEY  
ENVIRONMENTAL IMPACT  
REVIEW BOARD



**IR Number:** IR0405-002-9  
**Source:** CPAWS, Parks Canada (modified)  
**To:** INAC, GNWT, and Canadian Zinc  
**DAR Section:** 5.3 Reclamation  
**Terms of Reference Section:** E-3

### **Preamble**

The developer notes that “a seed mix of native vegetation will be selected to quickly re-establish stable conditions and plant cover”. Based on a search of northern seed suppliers, no “native seed mixes” appear to be available for the Taiga Cordillera Ecozone.

### **Request**

Please research the availability of an appropriate native seed mix for the Taiga Cordillera Ecozone. If available, provide:

1. the source of the seed including supplier information
2. a list of plant species and confirmation that the species are all native to this Ecozone and to the Prairie Creek area.
3. what measures will be used to ensure conditions will be stabilized and no exotic plant species will be introduced to the detriment of the relatively remote, isolated and native Ecozone?
4. the results of similar reclamation techniques in other locations under similar ecological conditions.

### **Responses**

The responsibility for inspections and approval of reclamation activities at the Prairie Creek Mine resides with Mackenzie Valley Land and Water Board and the Department of Indian and Northern Affairs Canada. Information on appropriate native seed mixes for the Taiga Cordillera Ecozone is therefore best obtained from the federal government or the Canadian Zinc Corporation. Federal government departments such as the Department of Indian and Northern Affairs Canada and Parks Canada that have the mandate for or have research experience in reclamation in alpine ecosystems may be able to provide assistance. Information, for example, on successful reclamation techniques in alpine areas of national parks may assist the Canadian Zinc Corporation in their project planning and be useful to the MVEIRB.

Batch analysis should be conducted on any seed mixes used for reclamation on newly disturbed areas that result from the proposed activities. The analysis should confirm the species composition of the mix as well as determine if invasive species are present. The presence of species that could not be easily controlled (e.g. hand pulling or mowing) or would require the use of pesticides for their control would be of concern. It is important to avoid the introduction of species that required chemical control near water bodies. Maintaining a log of seed batches, related analysis and the corresponding seeded location is important for future prediction of possible problem areas should native species be unintentionally introduced.

The Canadian Zinc Corporation has stated that they will retain a qualified biologist / plant ecologist to conduct a survey of the vegetation in the areas where there may be a disturbance. An outcome of the survey will be recommendations on approaches for reclamation of disturbed areas. It is expected that such recommendations made by the qualified professional(s) would be defensible.

**IR Number:** IR0405-002-14  
**Source:** MVEIRB (CPAWS)  
**To:** GNWT/INAC  
**DAR Section:** 3.0 Project Response to Environmental Sensitivity  
**Terms of Reference Section:** C

**Preamble**

Throughout the DAR section, there are references to thresholds and mitigation measures (4<sup>th</sup> paragraph, page 25; 2<sup>nd</sup> paragraph, first sentence, page 26; 4<sup>th</sup> paragraph, last sentence, page 26) however it is not clear what the quantitative or “measurable” thresholds are and what the specific proposed mitigative measures will be. It is also noted that the developer will engage a qualified Biologist to undertake surveys, provide advice on wildlife issues, assess habitat conditions, develop guidelines, etc.

**Request**

Are there any justifiable thresholds that could be applied to the environmental sensitivities described in the DAR section referenced above?

**Responses**

The original request refers to particular sentences or paragraphs in the Developers Assessment Report. These sentences are provided in the following response to ensure continuity between the referenced material and the response provided below by the GNWT.

*4<sup>th</sup> paragraph, page 25 "A number of sensitivity criteria were listed in the TOR for consideration of project responses. Each of these is discussed below. It is understood that thresholds need to be considered when evaluating the criteria. To this end, CZN believes the thresholds should be measurable where possible, and not arbitrary. With measurable thresholds, there should be less chance of a misunderstanding later, and greater confidence in the application of the sensitivity criteria in fostering real environmental impact reduction."*

**Response:** This paragraph is not specific to a topic but refers to the subsequent portions of the DAR. Without reference to specific topic this particular paragraph cannot be addressed regarding "justifiable thresholds". Many of the subject areas discussed after page 25 are not within the mandate or expertise of the GNWT, in particular the two specific questions that follow in the Preamble.

*2<sup>nd</sup> paragraph, first sentence, page 26 "CZN agrees that there should be suitable thresholds, the exceedence of which would indicate a need for additional control measures."*

**Response:** This sentence is in reference to the topic of *Steep Topography* and the potential need for erosion and sediment production control measures. This question is best referred to the Department of Indian and Northern Affairs Canada and the Department of Fisheries and Oceans Canada.

4<sup>th</sup> paragraph, last sentence, page 26 *"However, CZN will not rely on this, and will apply mitigation measures for all work areas as a safeguard, with a focus on road construction and use."*

**Response:** This sentence is in reference to the topic of *Soils with High Erosion/Compaction/Sedimentation Potential* and the potential need for mitigation measures. This question is best referred to Department of Indian and Northern Affairs Canada and the Department of Fisheries and Oceans Canada.

Although the Information Request does not specifically refer to subject matters within the mandate of the Government of the Northwest Territories, it is apparent that the original requester referred to "examples". The following two additional "examples" can be commented on by the Government of the Northwest Territories.

#### *Areas Used by Wildlife*

*"As noted in the DPD, a variety of wildlife is present in the area, especially Dall's sheep and grizzly bears. Dall's sheep are quite common. The locations, density and habits of the sheep are reasonably well known from observations during site operations. For example, the sheep frequent the rugged terrain east of the mine, and a grizzly bear is occasionally sighted near the mine area (roughly once a year). At the present time, CZN is not aware of specific areas to avoid, or what thresholds should be used to determine if and when project activities should be modified to minimize impacts. For these reasons, CZN will engage a qualified biologist to undertake a survey of the proposed area of drilling. The biologist will be instructed to characterize the use of land by wildlife, and provide guidance on avoidance, thresholds to dictate operational changes, and other mitigation approaches."*

**Response:** The Government of the Northwest Territories agrees that it is possible to define, within an environmental protection plan and monitoring program, situations and appropriate responses. However, it is the responsible of the proponent to provide these plans and programs for review and approval. Discussion with the Government of the Northwest Territories of appropriate measures during the development of these plans and programs is encouraged.

Given the reported presence of Dall's sheep and grizzly bears in the area, it is expected that the Canadian Zinc Corporation will commit to include these species in their environmental protection plan and monitoring program for this project. For Dall sheep, management plans should address access to mineral licks and escape terrain; protecting lambing/kidding habitat and preventing access to areas of potential attractants (i.e. sumps).

For some species, such as grizzly bears, it will be necessary to prepare a response plan for this project or amend an existing plan to incorporate the proposed work. The content of a bear response plan for the proposed work will depend upon site specific factors and discussion with the Government of the Northwest Territories.

#### *Vegetation Communities*

*“As for wildlife, CZN is not aware of specific areas of sensitive vegetation to avoid, or what thresholds should be used to determine if and when project activities should be modified to minimize impacts. The biologist to be engaged to provide advice on wildlife issues will also be responsible for assessing habitat conditions and identifying any particularly vulnerable plant communities in the proposed exploration area, and providing guidance to the exploration team on how to minimize the potential for impacts to any sensitive plant communities.”*

#### **Response:**

It is the proponent's responsibility to research and provide its plans and programs for review and approval. The Government of the Northwest Territories is available to discuss appropriate measures during the development of these plans and programs. Relevant information may be found in the *NWT Species Monitoring Infobase* or the *General Status Ranks of Wild Species in the Northwest Territories*.

The Government of the Northwest Territories maintains a *NWT Species Monitoring Infobase* ([http://www.nwtwildlife.rwed.gov.nt.ca/rwed\\_infobase/asp/search.asp](http://www.nwtwildlife.rwed.gov.nt.ca/rwed_infobase/asp/search.asp)); a searchable online catalogue of referenced information on the status of wild species in the NWT. The Government of the Northwest Territories, with the assistance of federal agencies and all wildlife co-management boards, facilitates the publication of the *General Status Ranks of Wild Species in the Northwest Territories* (<http://www.nwtwildlife.rwed.gov.nt.ca/monitoring/default.htm>). The main goal of the General Status Ranking program is to help prioritize species for more detailed status assessment by the Committee on the Status of Endangered Wildlife in Canada at the national level, and by a future species at risk committee at the NWT level. An updated *General Status Ranks of Wild Species in the Northwest Territories* including all mammals, birds, amphibians, reptiles, and freshwater fishes will be published in 2005. In addition, information is being summarized on species to be ranked for the first time in 2005; these include dragonflies, butterflies, and all vascular plants.