

## Chuck Hubert

---

**From:** laura.james@pc.gc.ca  
**Sent:** October 4, 2016 10:22 AM  
**To:** Chuck Hubert  
**Cc:** Allison.Stoddart@pc.gc.ca  
**Subject:** Fw: Parks Canada Baseline Expectations

Hello Chuck,

I am forwarding a copy of the email that PCA sent to CanZinc on July 7, 2016 as an attachment to the letter which Parks Canada sent to the Board on September 30, 2016 outlining concerns regarding the baseline data provided for the Proposed Prairie Creek All Season Road (EA1415-01).

Regards,  
Laura James

Environmental Assessment Specialist, Natural Resource Conservation Branch  
Parcs Canada / Parks Canada  
Spécialiste en évaluation environnementale, Direction de la conservation  
des ressources naturelles  
145 McDermot Ave  
Winnipeg, MB  
R3B 0R9

Telephone | Téléphone 204-983-2618  
Facsimile | Télécopieur 204-983-2618  
Courriel/Email: laura.james@pc.gc.ca

Time to Connect / Un bon temps pour se rapprocher

----- Forwarded by Laura James/NOTES/PC/CA on 04/10/2016 11:16 AM -----

From: Allison Stoddart/NOTES/PC/CA  
To: David Harpley <david@canadianzinc.com>, Alan B.. Taylor  
<alan@canadianzinc.com>  
Cc: Jon Tsetso/NOTES/PC/CA@PC, Laura James/NOTES/PC/CA@PC, Jonah  
Mitchell/NOTES/PC/CA@PC  
Date: 07/07/2016 01:27 PM  
Subject: Parks Canada Baseline Expectations

Hi David and Alan,

I am writing to clarify Parks Canada's expectations with respect to meeting the TOR and ensuring an appropriate level of baseline information when determining potential impacts of the proposed all season road.

As indicated in the e-mail below, Parks Canada has been open and transparent regarding baseline data expectations for this environmental assessment since the application was first received. Following the conversation between yourselves, Jonathan and I at the technical session, it was our understanding that CZN would not be doing any further baseline work within the EA process. However, in the last week, CZN has indicated that an Archaeological Overview Assessment will be completed and, has put in an application for a permit to do research in the park. Parks Canada appreciates these efforts however would like to ensure that the work being proposed by CZN will effectively contribute to the gaps in baseline information that have been identified.

In order to ensure the most effective and efficient use of time and resources, the following is a summary of Parks Canada's expectations in terms of the baseline work that must be completed. (See Below)

Parks Canada asks that CZN indicate in writing to the Review Board, prior to July 11th, how they are planning to meet these baseline requirements. Please outline as an undertaking the work that will be completed within the EA phase, and any work that is proposed to be done in the regulatory phase as a commitment. Based on this information, Parks Canada will be able to determine if a request for ruling is required and what would be in such a request.

Jonathan and I will be available Friday afternoon to discuss, please let me know what time would work best for you.

Thanks,

Allison

Wildlife

Parks Canada is requesting the collection of baseline data on wildlife as outlined in the Terms of Reference (Sections 3.2.3, 5.1.4 and 5.1.6), for the following:

1. Population characteristics and habitat use of the project area by resident and migratory birds, with emphasis on forest bird communities, waterfowl, and avian species at risk
  - We define population characteristics as including species presence, distribution, relative abundance and density estimates of the avian community within each habitat type of the project area.
  - We define habitat use as including use of habitats for foraging, reproduction and rearing of offspring and that includes seasonality in their use.
  - Data describing population characteristics and habitat use of forest birds and avian SAR can be collected, simultaneously, through the use of automatic recording units, which can be deployed in the field and later retrieved, then transcribed and analyzed.
  - Data for waterfowl can be collected through ground surveys at all ponds along the route and at water crossings, at least twice during the breeding period (early and late spring) to capture early and late migrant/nesters.
  - Survey methodology must include the appropriate spatial distribution and seasonal timing for adequate representation of species and habitat types along the proposed alignment.
  - Survey methods and overall sampling design must be developed in consultation with both Parks Canada and Environment and Climate

Change Canada.

2. Habitat suitability for black bears in the project area including foraging, denning and travel considerations.
  - Survey methodology must use recognised and standard methods
  - Survey methods and overall sampling design must be developed in consultation with Parks Canada
3. Species presence for Collared Pika
  - Survey methodology must use recognized and standard methods
  - Survey methods and overall sampling design must be developed in consultation with Parks Canada

## Vegetation

Parks Canada is requesting baseline data on vegetation as outlined in the Terms of Reference (Sections 5.1.7, 7.3.9), for the following:

- 1) ground-truthing a vegetation classification in the project area, using the Parks Canada Ecological Land Classification to describe current vegetation and assemblages (TOR Section 5.1.7, points 1 and 2)

This request would build on past work and would require a rigorous sampling design to accurately describe vegetation assemblages. The relevé approach used by Beak Consultants (1981) which consisted of replicated sets of nested plots at each site or transect would be appropriate, with the size of each relevé dependent on the structure and size of the community type being sampled. Detailed plot survey would include measurements of the structure and composition of the vegetation community, i.e., vegetation height, percent cover by species, plus site characteristics (e.g., slope, aspect, soil type).

- 2) the ground-truthed classification will be used to assess the presence of rare plant species and rare assemblages that could potentially occur along the project alignment (TOR Section 5.1.7, bullets 3 and 4), and would take into account, and be compared to, relevant literature on rare and uncommon terrain in the project area.

Our request addresses the need to conduct fine-scale field assessments (i.e., of representative habitats) in high priority areas. High priority areas include those deemed to be highly sensitive to disturbance, and support uncommon plant communities or habitats, and small-scale features and microhabitats (Alberta Native Plant Council 2012).

- 3) survey data to describe areas of high rare plant potential and high rare vegetation assemblage potential (TOR Section 5.1.7, bullets 3 and 4)

For the assessment of rare species and vegetation communities, we request that assessment methodologies are consistent with best practices outlined by Alberta Native Plant Council (2012) and for rare ecological communities by Allen (2011).

Note that survey methodology must include an appropriate spatial distribution and replication of sample sites to be an adequate representation of ecosystems along the proposed alignment.

Survey methods and overall sampling design must be developed in consultation with Parks Canada

## Cultural Resources

Parks Canada is requesting the following baseline work with regards to cultural resources as outlined in the TOR (section 5.2.3):

1. An archaeological overview assessment (AOA) for the entire proposed right of way and any associated project components that involve ground disturbance within Nahanni National Park Reserve (NNPR). The AOA shall be completed using recognised and standard methods. An AOA would assess the project area in more detail to identify archaeological site potential for historic and precontact use, reflective of different time periods and a variety of cultural groups. The AOA must incorporate traditional knowledge along with other knowledge and apply empirical tools, such as predictive

modeling, to identify the potential of archaeological resources.

2. An archaeological impact assessment (AIA) for those locations identified as having high potential for archaeological resources in the AOA. The AIA shall be completed using recognised, standard methods. This must include surface reconnaissance and test unit excavation. It is strongly recommended that the field work associated with the AIA include First Nation community members with traditional use connections to the construction area, including Nahanni Butte and Liidlii Kue First Nation. This would provide hands-on training for an individual who could be employed during the flagging and/or construction components and who can serve as a “heritage inspector” for accidental recoveries as recommended by the proponent.

The AOA and AIA must be completed by a professional archaeologist with experience and knowledge of the area with Parks Canada’s input in the statement of work and design

#### References

Alberta Native Plant Council. 2012. Guidelines for Rare Vascular Plant Surveys in Alberta. Available online:  
<http://www.anpc.ab.ca/content/resources.php>

Allen, L. 2011 Alberta Conservation Information Center - ecological community sampling guidelines.

Alberta Tourism Parks and Recreation. Edmonton, Alberta. Available online:  
[http://www.albertaparks.ca/media/1365919/ecological\\_community\\_sampling\\_guidelines\\_2011.pdf](http://www.albertaparks.ca/media/1365919/ecological_community_sampling_guidelines_2011.pdf)

Beak Consultants Ltd. 1981. Prairie Creek Project Vegetation and Wildlife Studies, 1981.

Beak Consultants Ltd. 1982. Prairie Creek Project: 1982 Wildlife Studies Addendum

Chilbourne, Brian. 2007. April 2007 Wildlife Reconnaissance Prairie Creek Mine Winter Road and Alternate. Fort St. John.

Rescan Environmental Service. (1994). Prairie Creek Vegetation and Wildlife Initial Environmental Evaluation.

Prager, Gabriella. Prairie Creek Mine Access Road Archaeological Investigations 2009. Points West Heritage Consulting Ltd. December 2009.

Allison Stoddart  
Spécialiste en évaluation environnementale, Direction de la conservation  
des ressources naturelles  
Environmental Assessment Specialist, Natural Resource Conservation Branch  
Parcs Canada / Parks Canada  
30, rue Victoria, 3<sup>ième</sup> étage, pièce 69 (Code de destination PC-03-C)  
Gatineau (Québec)

allison.stoddart@pc.gc.ca  
Telephone / Téléphone: 819-420-9188  
www.parkscanada.gc.ca | www.parcscanada.gc.ca  
Gouvernement du Canada | Government of Canada