

September 11, 2015

ISSUED FOR USE FILE: ENVMIN03073-01

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Attention: Mr. David Harpley

Vice President, Environment and Permitting Affairs

Subject: Invasive Plant Management Plan, Adequacy Review Item 8.3

Tetra Tech EBA Inc. (Tetra Tech EBA) recently updated the Vegetation and Wildlife and Wildlife Habitat Developers Assessment Report Sections (version 2) (Assessment Report) to support the regulatory approvals for the proposed all season road to the Prairie Creek Mine, Northwest Territories. This report was prepared following the Mackenzie Valley Review Board's (MVRB) Terms of Reference (September 12, 2014) and Adequacy Review (May 22, 2015).

Item 8.3 of the Adequacy Review requests a draft framework of a management plan for invasive plant species. On further review of our recent report, we conclude that the relevant information for the invasive plant management plan is contained in the Assessment Report (e.g., Sections 8.7.8 and 8.7.10.1 to 8.7.10.3), but it may not be clear to reviewers that this information will be incorporated into an invasive plant management plan. Therefore, for clarity, we propose the following draft framework, following requirements stated in the Adequacy Review Item 8.3:

- Stakeholders to be involved in the development of the plan (Assessment Report Section 8.7.8): It is our
 understanding that draft management plans are normally completed by proponents as a condition of permits.
 Regulators (in this case the Mackenzie Valley Land and Water Board [MVLWB] and Parks Canada) would then
 circulate such draft plans to stakeholders for comments;
- Invasive species introduction and prevention strategies (Assessment Report Sections 8.7.8 and 8.7.10.1 to 8.7.10.3): We understand that truck tractors will be dedicated to either the all season road or the highway haul on the Liard Highway. This will help reduce the risk of introducing invasive species. However, truck trailers will travel on both roads, and therefore pose a risk, as would special deliveries. To assist in mitigating this risk, it would be a requirement that all trucks be inspected for cleanliness before using the all season road. Any accumulations of dirt or mud would be removed prior to using the road. Additional prevention strategies include prohibiting the use of seed mixes and products potentially hosting invasive plants, managing disturbed areas to encourage natural encroachment of native species, and maintaining roadsides using mechanical control to keep healthy plant communities that are resistant to invasive plant establishment; and
- Invasive species mitigation and removal (Assessment Report Sections 8.7.10.1 to 8.7.10.3): Besides inspecting trucks for cleanliness and removing accumulated dirt and mud prior to using the road, we recommend that Environmental Monitors that will be engaged to oversee road operations are familiar with common invasive species, and that they routinely monitor for their presence. Following any positive detections, a more thorough inspection will need to be carried out and a removal plan implemented. Appropriate removal strategies will be dependent upon the invasive species; however, mechanical treatments such as covering/smothering, cutting, and digging may be agreeable.

CLOSURE

We trust this letter clarifies the intent of the invasive plant management plan. If you have any questions or comments, please contact the undersigned.

 $Respectfully \ submitted,$

Tetra Tech EBA Inc.

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