

Our File: EA1415-01

October 31<sup>st</sup>, 2016

Jonathon Tsetso  
Superintendent  
Nahanni National Park Reserve  
P.O. Box 348  
Fort Simpson, NT X0E 0N0

Via email: [Jon.Tsetso@pc.gc.ca](mailto:Jon.Tsetso@pc.gc.ca)

Dear Mr. Tsetso,

**RE: EA1415-01, Prairie Creek All-season road, response to Parks Canada September 30 letter on baseline information gaps**

This letter is in response to Parks Canada's correspondence of September 30, 2016<sup>1</sup>, regarding its perspective on baseline information gaps within Nahanni National Park Reserve (NNPR) in the environmental assessment of the Prairie Creek All-season Road (the project). The Review Board thanks Parks Canada for its thorough review of existing biophysical baseline information submitted by the developer in support of the project and its analysis of potential gaps specific to wildlife and vegetation baseline information within the NNPR.

Your specific request asks for additional biophysical baseline data collection by the developer within NNPR so that Parks Canada can complete a full analysis of the potential for significant adverse impacts from the project on wildlife, vegetation and species at risk. The Review Board considered this request at its October 26, 2016, Board meeting.

The evaluation of impacts on the ecological integrity of NNPR from the proposed Prairie Creek Mine All-season road is a key line of inquiry in EA1415-01. With respect to species at risk, the Review Board is obligated to consider impact to species at risk in accordance with Section 79(2) of the *Species at Risk Act*. Specifically, the Review Board:

*"must identify the adverse effects of the project on the listed wildlife species and its critical habitat and, if the project is carried out, must ensure that measures are taken to avoid or lessen those effects and to monitor them. The measures must be taken in a way that is consistent with any applicable recovery strategy and action plans".*

In April 2016, the Review Board determined that the information submitted by CanZinc in its Developer's Assessment Report was adequate to proceed to the next phase in the environmental assessment. At the June technical sessions, Parks Canada requested that CanZinc conduct additional baseline field surveys and stated that it would work with the developer to complete baseline data requirements during the summer

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<sup>1</sup> [Letter from Parks Canada to the Review Board re baseline information gaps 30-Sep-16](#)



field season. Parks Canada's September 30, 2016 correspondence advises that while some additional survey work was completed, in the view of Parks Canada, baseline information requirements within the NNPR have still not been met. According to the Review Board's Work Plan for EA1415-01, Technical Reports from parties, including Parks Canada, will be due in January 2017. Public hearings are tentatively planned for March or April 2017.

Should it choose to do so, Parks Canada may present evidence to the Board in its Technical Report on whether the project may have significant impacts to the ecological integrity of NNPR or on specific wildlife or plant species. If this is the case, Parks Canada should explain the reasons why, in its view, project impacts are significant. Information contained in the September 30 letter provides evidence that can be used in Parks Canada's Technical Report. Parks Canada may also address the effects of these data gaps on the CanZinc impact predictions and describe how these may result in the potential for significant adverse impacts. Parks Canada could assist the Board by providing suggested mitigations, including adaptive management solutions, that could be implemented prior to any potential impacts occurring.

Parks Canada will also have the opportunity to speak directly to the Board during public hearings and can provide additional arguments on the evidence in its closing submission. The Review Board looks forward to Parks Canada's continued participation in this environmental assessment.

If you have further questions or need clarification, please contact Chuck Hubert at (867) 766-7054 or [chubert@reviewboard.ca](mailto:chubert@reviewboard.ca).

Sincerely,

Mark Cliffe-Phillips  
Executive Director  
Mackenzie Valley Review Board