



Nahanni National Park Reserve
P.O. Box 348
Fort Simpson, NT
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JoAnne Deneron
Chairperson
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

July 10, 2015

Dear Ms. Deneron,

Re: Selwyn-Chihong Ltd. Land Use Permit and Water License Application for the Howard's Pass Access Road Upgrade Project within Nahanni National Park Reserve (NNPR) and Nááts'ihch'oh National Park Reserve (NaNPR)

This letter is for the purpose of referring Selwyn Chihong Mining Ltd's application to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for environmental assessment. On July 03, 2015 Parks Canada received an application from Selwyn Chihong Mining Ltd. for a Land Use Permit and Water Licence to upgrade the Howard's Pass Access Road (HPAR).

The HPAR is a mineral exploration road that runs 79 km northwest from the Nahanni Range Road near Tungsten, NWT to the Howard's Pass zinc-lead deposit located on the Yukon-Northwest Territories border. En route, the HPAR passes through 22 km of Nahanni National Park Reserve and 24 km of Nááts'ihch'oh National Park Reserve. The remaining sections of road outside Parks Canada lands are administered by the Government of the Northwest Territories.

The road is currently a rugged, single-lane gravel road with pull-outs and will require significant upgrades to support future mining operations. The proposed upgrades include widening the existing road bed from 4 m to 8.5 m; significant new quarries to source road bed construction materials; new realignments; extending existing culverts and relocation of culverts where necessary for realignments.

The proposed development will increase the road's capacity to facilitate mining operations which will include new activities that are significantly larger in scale from the current design and purpose of the HPAR. The proposed upgrades will accommodate for the first time unimpeded 2-way traffic, larger trucks at a greater speed and include haulage of lead and zinc ore concentrates, as well as larger quantities of fuel and chemicals for mine operations. Overall there will be a much greater volume of traffic on the road.



Following our review and analysis of the application, it has been determined that the proposed development might have significant adverse impacts to the environment. The proposed road construction; mine haul operations and restoration activities might have significant impacts on the following environmental components:

- Wildlife species such as caribou, Dall's sheep, mountain goats, grizzly bears, black bears and nesting birds that are sensitive to linear developments, traffic, and overall human activities
- Water resources, fish, fish habitat and long term stream health
- Introduction of invasive non-native plant species and potential for reduced biodiversity and impacts to existing plant communities.
- Cultural and archeological resources.
- Nahanni and Nààts'ihch'oh national park reserves.

The proposed development is in rugged terrain resulting in a higher potential for spills and accidents near fish bearing streams. Further research and analysis is required to fully understand and mitigate environmental hazards, spill risk management and effective response.

Therefore pursuant to section 126 of the *Mackenzie Valley Resource Management Act*, Parks Canada is referring the application to the Review Board for environmental assessment.

Parks Canada will be an active participant in the Review Board's environmental assessment of this application. Please feel free to contact me at (867) 695-7752 or Jon.Tsetso@pc.gc.ca if you should require more information or have any questions.

Sincerely,

Jonathan Tsetso
A/Superintendent
Nahanni National Park Reserve

cc: Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board
Willard Hagen, Chair and Chief Executive Officer, Mackenzie Valley Land and Water Board
Doug Reeve, Manager Regulatory and Permitting Affairs, Selwyn Chihong Mining Ltd.
David Britton, A/Field Unit Superintendent, Southwest Northwest Territories Field Unit, Parks Canada Agency