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MACKENZIE VALLEY
ENVIRONMENTAL IMPACT
REVIEW BOARD

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March 1, 2003

Alan Ehrlich

Manager of Environmental Impact Assessment

Mackenzie Valley Environmental Impact Review Board *

Re: Canadian Zinc Corporation Decline and Metallurgical Pilot Plant

Deh Cho First Nations have significant concerns regarding the structural integrity of both the current and the proposed Canadian Zinc water treatment options. Deh Cho communities, including Nahanni Butte, Fort Simpson and Wrigley have all expressed serious concern regarding the current and potential hazards that Canadian Zinc operations pose to water quality and wildlife in Deh Cho territory. Deh Cho First Nations are concerned that the Canadian Zinc operation poses serious long-term threats to the ecological integrity of Deh Cho waters and aquatic life.

As the MVEIRB has expanded the scope of the environmental assessment, by allowing new water treatment plans to be entered into the environmental assessment procedure, Deh Cho First Nations request that the environmental assessment procedure requires that Canadian Zinc provide detailed information regarding the impacts, significance of impacts, and mitigation of such impacts on all new water treatment options. Furthermore, Canadian Zinc's response to the MVEIRB is deficient in information and does not contain enough technical detail upon which to make a sound, fully informed decision. The information provided by Canadian Zinc is extremely vague and lacks site-specific information on projected water quality, structural design of water treatment options, structural integrity of water treatment options, exact locations and size of water treatment options, decommissioning plans, and detailed descriptions of the newly proposed water treatment system.

Canadian Zinc has still not provided geotechnical evidence that the current tailings ponds are structurally intact. *Information Request:* Deh Cho First Nations request that Canadian Zinc provide detailed site plans, engineering plans and geotechnical certification that the current tailing ponds are structurally intact and impermeable. We are very concerned that Canadian Zinc be allowed to operate without geotechnical certification of the tailing ponds.

Rescan Environmental Services only recommend that Canadian Zinc prepare plans and cross sections of the newly proposed water treatment options. *Information request:* Deh Cho First Nations request that Canadian Zinc submit detailed and certified engineering plans of the entire water treatment system, including any newly proposed water treatment options. The recommendation by Rescan Environmental Services that Canadian Zinc only provide a general site plan is insufficient, given the potential environmental effects of this mine. The physical location of the Canadian Zinc operation, including the close proximity of Harrison Creek and Prairie Creek, the nature of local porous rock, and the sensitivity of the watershed, local wildlife and aquatic life, requires that the engineering integrity of all water treatment options be certified and of the highest industry standard. *Information request:* Canadian Zinc provide concrete evidence and structural plans, including evidence that all water treatment options are impermeable and do not pose immediate or long-term threats to surface water, ground water, wildlife, aquatic life, and the health and well-being of Deh Cho residents.

Deh Cho First Nations consider the wetland system, newly proposed by Canadian Zinc as an unacceptable water treatment option. The fact that Canadian Zinc failed to provide an exact location, size, engineering plans, detailed description, or decommissioning plans of the proposed wetland is further evidence of Canadian Zinc's failure to provide the MVEIRB with quality water treatment plans. Regardless, the environmental sensitivity and long-term ecological integrity of the area demonstrate that this area is unacceptable as an experimental site for questionable water treatment options. Furthermore, the area downstream of the mine is sensitive habitat for moose and other wildlife and is entirely unsuitable for experimental wetland construction and mine effluents. *Deh Cho First Nations request that the proposed wetland option be removed from the water treatment options for the Canadian Zinc mine. Information request:* Canadian Zinc provides detailed plans, along with engineering designs and certification, of an alternative to the wetland option.

Regarding environmental monitoring, Deh Cho First Nations request that environmental monitoring be conducted at least once per week, not once per month as indicated in Canadian Zinc's response. Furthermore, Canadian Zinc notes that the mine "will result in CCME guidelines being consistently met downstream of the mine site in Prairie Creek." Here, Canadian Zinc is relying on dilution models in order to appear within acceptable discharge limits. We request that Canadian Zinc be subject to current regulatory standards at the discharge point from the mine. Additionally, Canadian Zinc's water license should be subject to current environmental regulations. Water quality monitoring should also occur at the discharge point, as well as at several locations downstream of the discharge point, not just 48 kilometres downstream of discharge. Please note that the report "Historical Water Quality of the Prairie Creek Project Area" noted excess levels of discharge from the mine, and recommended that sampling occur

closer to discharge sources. We also recommend that additional sampling sites be implemented upstream from the mine, in order to provide more accurate analysis of the effects of mine discharge on water quality.

As noted above, we are concerned about the long-term effects that the Canadian Zinc mine will have on Deh Cho lands and waters. *Information request:* Deh Cho First Nations request that Canadian Zinc provide updated information regarding the cumulative effects of the mine on water quality, wildlife, and aquatic life in Deh Cho territory. Cumulative effects assessment should include any potential effects from the newly proposed water treatment options. Deh Cho First Nations also request that fish sampling be undertaken on a regular basis, to adequately ensure the health of local fish populations and to ensure the health and safety of Deh Cho communities.

Canadian Zinc notes "In low concentrations, ammonia is in fact beneficial to plant life being a major component of fertilizers" and "nitrogen products are an essential nutrient source in aquatic systems at lower concentrations." Deh Cho First Nations point out that ammonia and nitrogen are detrimental to aquatic systems and life at unnatural, elevated levels. Indeed, excess fertilizers are toxic and can lead to eutrophication of aquatic ecosystems.

On two separate occasions during the past two weeks, Deh Cho First Nations have telephoned the MVEIRB for assistance in faxing us information relevant to this file, from the Public Registry currently located in Yellowknife. We have received no response for either voicemail. Given the volume, technical information, short response timelines, and importance of these Environmental Assessment proceedings to Deh Cho lands and people, we request that the MVEIRB undertake efforts to make the Public Registry more available to Deh Cho residents.

Sincerely,

Laura Pitkanen
Resource Management Coordinator