



P.O. Box 348
Ft Simpson, NT.
X0E 0N0

July 6, 2001

Mr. Vern Christensen
Executive Director
Mackenzie Valley Environmental Review Board (Board)
P.O. Box 938
Yellowknife, NT, X1A 2N7

Dear Mr. Christensen:

RE: Environmental Assessments Canadian Zinc Corporation (CZN):

- 1. Underground Decline and Drilling and Metallurgical Pilot Plant Developments, and**
- 2. Phase II Drilling Development (60 drill holes):**

I am writing to inform you of concerns with regard to the Canadian Zinc Corporation (CZN) development currently in front of the Board:

- The current timelines proposed by the Board for technical assessment of documents are unreasonable and may compromise the quality of reviews.;
- There is a need to consider previous environmental reports to take into account any report made in relation to that proposal before the coming into force of this Part (MVRMA section 127) for related developments. The timelines that have been established preclude the reviewers from accessing previous documents. For this particular development, data from 1981 and 1995 need to be incorporated. ;
- We have concerns that both these developments share common elements such as infrastructure, fuel storage, camp facilities which raises a number of interrelated environmental assessment questions (see attached). As such the scope of the applications are more extensive than one would have assumed.;
- Given the process to date we also have concern that the closure of the public registry prevents the Board from seeking clarification of issues raised through technical reviews.;
- We suggest an iterative, collaborative process for such exchange of information in the current EA process in order to support the Board in its deliberations. This would allow for a better quality assessment and a better process for both proponents and the board.

In conclusion, we respectfully request an extension of the current timelines to be able to adequately review the environmental assessment report and report on its technical acceptability, quality of the impact analysis and a list of information requests pertinent to the Terms of Reference and the EA report. We encourage the board staff to meet as soon as possible with reviewers to give consideration to more appropriate timelines in order to meet the Board's needs.

Please do not hesitate to contact me if you have any questions or clarifications.

Yours sincerely,

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Chuck Blyth

Superintendent

Nahanni National Park Reserve

Attachment

The following are a preliminary list of items raised in the current land use permit applications received to date for developments at Prairie Creek by Canadian Zinc. They are attached here to give you just a flavor of the type, complexity and interrelated nature of the applications and the deficiencies of the documents received to date. As noted previously time precludes a proper listing of all the concerns at this time.

There is a lack of consideration in each of the environmental assessment reports of the requirement to use the same infrastructure at the Prairie Creek Mine site. There is no analysis of the cumulative effects of increasing the number of staff using the same facilities for accommodation, and the use of ancillary facilities including the landing strip.

There is no description of the adequacy of those facilities meeting current environmental standards in the environmental assessment report. The report should answer the following questions: Does the existing wastewater treatment facility meet current standards? What standards are applicable and how are they met? What volume of treated effluent will be discharged to Prairie Creek? How does this volume compare to the total volume of flow in Prairie Creek, particularly in periods of low flow? What is the expected quality of the wastewater with respect to parameters such as BOD, suspended solids, pH, fecal and total coliform, phenols, oils and greases and phosphorus?

As a second example, do the fuel storage tanks that will be used on the site for power generation, gasoline storage, etc. meet current codes for safe storage? This is particularly important in light of the fact that a diesel oil spill at Prairie Creek resulted in the loss of 24,000 gallons of fuel of which only approximately 8,400 gallons were recovered in 1981. In a follow-up review of the reports related to the spill by the Department of Environment, several deficiencies at that time were raised as follows: "the operator had no spill contingency plan, no personnel trained in fuel recovery procedures and no equipment on-site for recovery operations. Since this was the case, it raises serious questions about the nature of licence conditions imposed upon the operator, compliance with these conditions, and inspections given operations of this nature." It was recommended that a contingency plan be developed, that personnel be trained in spill emergencies and that equipment be placed on-site to reduce the impact of future spills that could occur. The environmental assessment report needs to include a copy of the contingency plan (identification of who will be responsible for the reporting of spills, to whom will reports be made, a description of procedures to follow, a description of the type of training that will be provided and to whom, a description of the equipment that will be on-site, etc.

There are other deficiencies in the environmental assessment report with respect to the provision of accommodation at the mine site including solid waste management, water supplies, the use of the airstrip, etc.

Although the environmental assessment reports addresses the headings as required under the Terms of Reference, the report lacks the detail to make the information meaningful. As an example the report states that monitoring will be conducted for a number of different aspects. However no information is provided on who will be responsible for conducting the monitoring, what exactly will be monitored (will it be compliance with established procedures, and if so, what are the procedures), when it will be conducted (frequency), etc.