



December 11, 2015

JoAnne Deneron
Chair
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
5102 50th Avenue,
Yellowknife, NT
X1A 2N7

Dear Ms. Deneron

**RE: Environmental Assessment EA1415-001, Prairie Creek Mine
Proposed Airstrip along Access Road to Prairie Creek Mine**

Canadian Zinc Corporation (CZN) would like to provide for your consideration and for the record some comments on Parks Canada's letter to you dated November 24, 2015 regarding a proposed airstrip in connection with the Prairie Creek Access Road within the Nahanni National Park Reserve (NNPR).

In summary, Canadian Zinc does not agree with the position taken by Parks Canada in its letter to the Board dated November 24, 2015 with regard to the interpretation of Section 41.1 of the *Canada National Parks Act (CNPA)*. The intention of Parliament in enacting the amendments to the CNPA in 2009 were very clear in that the intent was to provide for access to the Prairie Creek Area notwithstanding the expansion of the Park. The intention of Section 41.1 is to create an exemption to the general prohibition in Section 13 of the CNPA and provide for access within and through the NNPR to the Prairie Creek Area. Parks Canada appears to be adopting a very narrow and literal interpretation to that exemption which is not consistent with the objectives of the amending legislation.

We agree with the statement in Parks Canada's letter that Section 41.1 requires that a facility be connected in purpose to the road. The purpose of the road is to provide access to the Prairie Creek Area and the purpose of the proposed airstrip is to provide service to the road and access by the road to the Prairie Creek Area. We submit that the proposed airstrip is a facility connected with that road and, to put it another way, the construction and use of the proposed airstrip is dependent on that airstrip being connected to the road. The airstrip without the road would serve no purpose whatsoever.

In its letter to the Board, Parks Canada stated that "the historical presence or absence of airstrips is not relevant to the current situation". CZN believes, on the contrary, that the historical airstrips are very relevant because they indicate clearly that the presence and use of airstrips supported the

construction and maintenance of the access road, and that thus they were “connected” to the road in purpose. Airstrips were used by Cadillac, the previous operator, for winter road construction in the 1980’s, and, in accordance with the decision of the Supreme Court of the NWT in May 2005, such winter road is grandfathered and exempt from EA under the *Mackenzie Valley Resource Management Act*.

CZN’s proposal is to similarly use an airstrip to support the construction and maintenance of the access road, although we also accept that, as stated in the project description report, the airstrip would also facilitate air access to the Mine, but only by utilisation of the road. The airstrip alone would not provide access to the Mine.

In Canadian Zinc’s opinion, Parks Canada’s interpretation of the CNPA is not correct. This is unfortunate considering the benefits that could result from construction of an airstrip on the Ram Plateau to parties other than CZN. As previously submitted, the airstrip could support greater tourism in the NNPR, with local and regional benefits. The airstrip would also enhance safety in that it would be available for emergency landings. Parks Canada itself has stated that one of the positive and desired outcomes of Park expansion is the potential for increased tourism.

CZN would like to encourage the Board to include the airstrip in the scope of the development as a substantial amount of assessment work on the proposed airstrip has already been completed and the actual permitting of such airstrip is a separate matter. CZN would continue discussions with Parks Canada regarding the permitting of the specific airstrip facilities post-EA.

Yours truly,
CANADIAN ZINC CORPORATION



David P. Harpley, P. Geo.
VP, Environment and Permitting Affairs