



Nahanni National Park Reserve
P.O. Box 348
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March 10, 2016

Mackenzie Valley Environmental Review Board
Box 938
#200 Scotia Center 5102-50th Avenue
Yellowknife, NT, X1A 2N7

To Sachi Desouza,

On February 12, 2016 the Mackenzie Valley Environmental Impact Review Board (the Review Board) submitted information requests (IR) to Canadian Zinc (CZN), the Government of the Northwest Territories and the Federal Government. IR #47 and 48 were directed to Parks Canada and the responses are included below:

Information Request #47 Comment: To Parks Canada: Parks Canada is a regulator in Nahanni National Park Reserve. Parks Canada currently manages and regulates all season road access into Nahanni National Park along the Howard's Pass Access Road, north of Cantung. Understanding existing access control within the Park at other locations will help Parties to understand potential mitigation options for the Prairie Creek all season road project.

1. Please describe existing access control techniques currently being implemented for the Howard's Pass Access Road in the Nahanni National Park Reserve.

Selwyn Chihong Mining Ltd. (SCML) financed all construction activities under existing permits to rehabilitate the Howard's Pass Access Road (HPAR). The project was completed in late 2014 providing all season access from the Nahanni Range road to their mining leases in Howard's Pass. This was the first operational road in the Nahanni National Park Reserve expansion area and Náátsi'hch'oh. Our primary guidance on managing the sections of the road in the park reserves is driven by our statutory/legislative requirements, consultations with our Aboriginal cooperative management partners, coordinating compliance monitoring and permitting with adjacent land regulators, and our positive working relationship with SCML.

To date Parks Canada has constructed a boundary sign and gate at km 14 of the HPAR on the southern park boundary. The gate is not locked and remains open. It serves primarily as a tool to manage road access in cases when the road is not safe for passage e.g. construction activities, washouts, slides, avalanches and/or avalanche control activities. The boundary signage clearly indicates that there is no hunting or ATV access in the park and that visitors are required to register with Parks Canada when they enter and leave the park. These provisions do not apply to aboriginal persons in pursuit of traditional activities. Parks Canada consults with SCML in permitting visitor access on the road to ensure appropriate risk management is in place. This may include general cautions and safety messaging, or special conditions for activities on the road e.g. carry



communications equipment, avoid parking in specific areas, limiting access near construction locations, limiting access during sensitive wildlife periods etc...

2. Are there long-term objectives for areas in the Nahanni National Park Reserve along the proposed all season road alignment? If so, what are they?

It is presumed this question remains within the context of the HPAR and will be addressed in that context. The Nahanni National Park Reserve Nah?ą Dehé Management Plan (2010) provides very broad policy guidance on road access and travel in Nahanni. Long term objectives for the road in the park must fit within Parks Canada's legislated mandate for ecological and cultural integrity, and visitor experience. These will be important considerations for developing long term objectives for the road which requires detailed discussions with the developer/proponent, our First Nations partners, stakeholders and other government regulators. These discussions have not occurred, however Parks Canada will participate in such future discussions when appropriate.

3. Please describe how Parks Canada will monitor and enforce use of the road in Nahanni National Park Reserve.

Parks Canada staff work closely with SCML to coordinate regular and periodic compliance inspections on the HPAR. A designated Parks Canada law enforcement unit conducts patrols on the HPAR and will also respond to reports of illegal or suspicious activity in the park reserves. These operational practises will also apply should the Prairie Creek access road be constructed.

Information Request #48 Comment: To Parks Canada: Approximately half of the Prairie Creek all season access road crosses the Nahanni National Park Reserve. CanZinc suggests in its DAR that the all season access road may facilitate increased tourism into the Nahanni National Park Reserve.

1. Please submit the current version of the Nahanni National Park Reserve Management Plan and relevant regulations. Does the upgrade to an all season road conflict with the current management plan? If so, how?

The Nahanni National Park Reserve Nah?ą Dehé Management Plan (2010) is publicly available in pdf format on the federal government website:

<http://www.pc.gc.ca/eng/pn-np/nt/nahanni/plan/plan2.aspx>

Authorities for issuance of permits for the roads comes from section 41.1 of the *Canada National Parks Act*. The CNPA allows Parks Canada to issue permits to Canadian Zinc (CZN) and SCML for the purposes of mining access roads and does not specify winter or all season. The management plan must be consistent with the CNPA.

2. Are there long-term objectives for areas in the Nahanni National Park Reserve along the proposed all season road alignment? If so, what are they?

The policy direction in the management plan was based on a winter road context with regards to access. Should an all season road be permitted this policy direction will need to be revisited. Future policy development for long term objectives for the Prairie Creek all season road will follow the same strategy outline in our response to IR #47-2.



3. How will Parks Canada address requests for use of the proposed all season road by outfitters, tourists and the general public into Nahanni National Park Reserve?

Parks Canada will work with Aboriginal cooperative management partners, stakeholders, other government departments and Canadian Zinc in developing appropriate visitation and public access strategies for the Prairie Creek access road. Parks Canada intends to provide consistency in policy application for both the HPAR and Prairie Creek access roads.

We trust that this information will be helpful in the Review Board's Impact assessment for EA1415-01. Should additional Information be required please do not hesitate to contact Environmental Assessment specialist Allison Stoddart at allison.stoddart@pc.gc.ca or (819)-420-9188.

Sincerely,

Jonathan Tsetso
Acting Superintendent
Nahanni National Park Reserve