



Fish Habitat Management  
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Gestion de l'Habitat du Poisson  
Suite 101 5204, 50e Avenue  
Yellowknife (Territoires du Nord-Ouest)  
X1A 1E2

Your file *Votre référence*  
EA 0405-002

Our file *Notre référence*  
SC04006

April 12, 2005

Martin Haefele, Environmental Impact Officer  
Mackenzie Valley Environmental Impact Review Board  
PO Box 938  
5102-50<sup>th</sup> Avenue  
Yellowknife, NT X1A 2N7

Dear Mr. Haefele:

**Re: Draft Terms of Reference and Work Plan, Canadian Zinc Corporation Phase 3 Surface Drilling Program, Prairie Creek Mine (EA 0405-002)**

As requested in your correspondence dated March 29, 2005, on behalf of the Department of Fisheries and Oceans, Fish Habitat Management – Western Arctic Area (DFO) I have reviewed the draft Terms of Reference (ToR) for the above Environmental Assessment and submit for consideration the following comments:

**Scope of the Development**

The ToR should specify that the proposed work will require the *re-establishment* of the existing road network. The existing road network is in varying states of disrepair, and some sections may require significant remedial work to re-establish their functionality. Since some sections of the roads will have revegetated naturally since they have been last used, disturbance to these areas should be taken into account when assessing potential environmental impacts.

Since the scope of the physical works or activities include use of the camp and infrastructure as required for the purposes of the Drilling Program (and separate from support for already permitted activities), *all* relevant permits / leases should be included in the ToR for review.

I suggest that bullet three and eight under physical works or activities (page 3) be amended to read:

- **Re-establishment of old road network**, road construction, road maintenance, alteration of drainage patterns, erosion prevention activities, excavation and stockpiling of soils;
- Efforts to reclaim disturbed areas **including infrastructure as required for the purposes of the Drilling Program.**

## Terms of Reference

### 4.1 General Terms

The Developers Assessment Report does not adequately address Environmental Monitoring and follow-up. The ToR should include a short and long-term monitoring and maintenance program that addresses sediment and erosion control measures, all crossings, and reclaimed sites for revegetation success.

#### *B-1 Road development*

I suggest that item c) be amended to read:

- c) Identify areas where road conditions or road alignment is a potential concern in terms of stability and erosion (as alluded to on page 28 of the Detailed Project Description), **and proximity to watercourses (closer than 30 metres)**. Provide maps that show those areas of potential concern.

#### *B-3 Drilling Sites*

The ToR should include a detailed definition of a “drill site”, including approximate dimensions.

#### *C Project Response to Environmental Sensitivity*

I suggest that the last bullet on page 7 be amended to read:

- Establishing “no-go” areas on areas of the road network that are already subject to compaction and erosion, have strong erosion and compaction potential, **or are in close (30 metres) proximity to any watercourse, including ephemeral streams.**

#### *E-1 Aquatic Resources and Habitat*

I suggest item 2 be reworded to **identify** the number of crossings of **any** watercourse.

#### *E-3 Reclamation*

The ToR should include a long-term monitoring and maintenance program that ensures revegetation success.

I appreciate the opportunity to provide comments on the above material. If you have any questions or wish to discuss any of the foregoing in more detail I can be contacted at (867) 669-4927.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ernest Watson', written in a cursive style.

Ernest Watson  
Area Habitat Biologist  
Fish Habitat Management  
Department of Fisheries and Oceans - Western Arctic Area

cc: J. Dahl, Fisheries and Oceans Canada  
L. Dow, Fisheries and Oceans Canada  
A. Wilson, Environment Canada  
K. Schlosser, Parks Canada  
P. Spencer, Indian and Northern Affairs Canada  
L. Seale, Indian and Northern Affairs Canada  
P. Cobban, Government of the Northwest Territories