



June 28, 2016

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Yellowknife, NT – X1A 1T5

VIA EMAIL

Chuck Hubert  
Senior Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
PO Box 2130  
Yellowknife, NT X1A 2P6

**RE: Federal Comments on the draft commitment list from the Canadian Zinc Corporation All Seasons Road**

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Dear Mr. Hubert,

Further to the Mackenzie Valley Environmental Impact Review Board's request dated June 23, 2016, the Canadian Northern Economic Development Agency's Northern Projects Management Office is pleased to provide the attached comments on the draft commitments list on behalf of federal parties to the above noted environmental assessment. Thank you for the opportunity to provide comments on the draft document.

The Government of Canada looks forward to continued participation in this review.

Sincerely,

Adrian Paradis  
Senior Project Manager  
Northern Projects Management Office

Attachments: (1) Federal Comments on Commitment List

Parks Canada has reviewed the Draft Commitments from the Technical Session for EA 1415-01 and recommends the following revisions:

#### **Commitment 4**

CanZinc commits to implementing erosion and sediment control during construction within 100 m of a fish bearing channel when water is present, or could be present within a short period of time (including specific plans for rapid response in the event of a charge).

#### **Recommendation:**

Amend wording to

CanZinc commits to implementing erosion and sediment control where construction disrupt soils or where sediments will be more likely to be mobilised and transported to surface waters and include specific plans for rapid response in the event of a charge.

#### **Commitment 5**

CanZinc commits to placing any stockpiles of material 50 m from flowing water courses. Where this is not possible (e.g. in tight canyons or valleys), CanZinc will implement appropriate erosion and sediment control measures to avoid impacts.

#### **Recommendation:**

Amend wording to:

CanZinc commits to locating stockpiles of rock and large fraction substances at least 50 m from waterbodies and installing sediment control measures if required to ensure these materials do not migrate into surface waters. Stockpile of rock and other coarse grained materials will be placed on non-vegetated areas to minimize disturbance of vegetation where possible.

Can Zinc commits to stocking piling of soils and fine materials on sites that are at least 100 m from a waterbody. In addition, sediment control measures will be installed at locations where soils could migrate and enter waterbodies. These materials will be retained for reclamation and restoration purposes. In addition, CanZinc shall install sediment control measures when they believe that soils could migrate and enter surface waters.

#### **Commitment 7**

CanZinc commits to developing a suitable inspection and monitoring plan regarding drainage patterns along the road alignment to maintain natural drainage and to inform adaptive management actions (including location of equipment required for these management actions such as backhoes and steamers).

#### **Recommendation**

Amend wording to:

CanZinc commits to developing a suitable inspection and monitoring plan regarding drainage patterns along the road alignment to maintain natural drainage and to inform adaptive management actions (including considerations for potential fish captures during significant erosion and sediment control works, high risk locations and timing windows, but also the location of equipment required for these management actions such as backhoes, a readily available supply of appropriate erosion and sediment control tools to on hand and steamers).

### **Commitment 10**

CanZinc commits to implementing TSS monitoring to address the potential impacts of submerged road surfaces during higher water events (upstream and downstream of Casket Creek and at any other areas where overtopping of road surface is likely to occur).

#### **Recommendation:**

Amend wording to:

CanZinc commits to monitor TSS, pH, dissolved oxygen, conductivity and turbidity to address the potential impacts of submerged road surfaces during higher water events (upstream and downstream of Casket Creek and at any other areas where overtopping the road surface is likely to occur).

#### **Recommendations for Additional Commitments:**

Parks Canada recommends CanZinc commit to adhering to road design standards in the B.C. Ministry of Forests, Lands and Natural Resources Operations Engineering Manual as referenced in Allnorth Response to Information Requests (Proposed Prairie Creek All Season Road) dated May 3, 2016.

Parks Canada recommends that CanZinc commit to incorporating a wider chain-on/off pullout at approximately KP 29 or 30 and that pullouts which will allow trucks with trailers to turn around at approximately 10 km intervals.

Parks Canada recommends that CanZinc commit to a minimum 5 m road top width in the final road design, plus widenings at curves as outlined in the BC Forests, Lands and Resources Operations Engineering Manual.

In addition to commitments made by Canadian Zinc in the DAR and DAR Addendum associated with reclamation, Parks Canada requires the reclamation of the project area to a natural state in which the structure and function of the ecosystem is not impaired. Ecosystem restoration is a complex process which requires adaptive management. Parks Canada has noted that CanZinc has identified the restoration of natural drainage, landscape contouring, the removal of infrastructure and scarification to encourage natural regeneration and erosion control (DAR Addendum, Appendix A, Proposed Prairie Creek All Season Access Road, Supplement to Original Submission, Allnorth, and September 8, 2015). Parks Canada further recommends CanZinc commit to incorporating adaptive management into the Reclamation Plan and that all structures including those associated with Sundog Creek are removed as a part of reclamation activities. Parks Canada recommends that CanZinc update the Wildlife Mitigation and Monitoring Plan during the EA phase.