



DEHCHO FIRST NATIONS

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Mackenzie Valley Land and Water Board
PO Box 2130, Yellowknife, NT, X1A 2P6
Attention: Jacqueline Ho

March 13, 2019

RE: Extension Request to submit comments on Canadian Zinc Corporation (CZN) Prairie Creek All Season Road– Land Use Permits and Water Licences MV2014F0013 MV2014L8-0006 MV2019L8-0002 PC2014F0013 PC2014L8-0006)

Canadian Zinc Corporation (CZN) submitted a Post-EA Information Package to Mackenzie Valley Land and Water Board (MVLWB) and Parks Canada's regarding its Type A Land Use Permits (Permits) and Type B Water Licences (Licences) for the Prairie Creek All Season Road.

The post-EA Information Package includes: Main Report; Access Road Maps; Construction Camp Layout Drawings; Studies to Date; Updated Commitment Tables; Draft Closure Cost Estimates (please note there are estimates for territorial, federal and Parks land); Engagement Record, Log, and Plan; Waste Management Plan; Spill Contingency Plan; Health Safety and Emergency Response Plan; Explosive Management Plan; Invasive Species Management Plan and Data Report; Rare Plant Management Plan and Data Report; Permafrost Management Plan; Preliminary Geotechnical Investigation Report; Sediment and Erosion Control Plan; Sundog Creek Diversion Plan; Geochemical Verification Program; Borrow Pit Management and Reclamation Plan; Borrow Pit Information; Road Operations and Maintenance Plan; Road Construction Management Plan; ASR Design Drawings; Non-Typical Winter Road Section Design Drawings; Summary of Minor Stream crossings; Stream Crossing Hydrology Data; Stream Crossing General Arrangement Drawings; Hoverbarge Details; Panel Candidate CVs; Terms of Reference for the Independent Technical Review Panel; Avalanche Hazard and Safety; Traffic Control Mitigation and Management Plan; Wildlife Management and Monitoring Plan and Data

Report; Preliminary Archaeological Impact Assessment Summary; Closure and Reclamation Plan; and CZN's Proposed Draft Land Use Permit Conditions.

Due to the number and length of the documents submitted by CZN, DFN will not be able to adequately read, review and provide comments on the documents associated with the LUP and WL listed above, by April 2, 2019. The limited time provided to review the lengthy documents provided by CZN is inconsistent with the MVLWB Board's engagement and consultation policy. The MVLWB engagement and consultation policy states: "Proponents are required "to initiate dialogue and engagement planning with affected parties, particularly affected Aboriginal organizations/governments, in advance of an application with the goal of: explaining the project; identifying concerns and potential environmental impacts (including any potential for impacts to Aboriginal and treaty rights); addressing concerns raised; and ensuring appropriate levels and types of engagement are carried out over the life of an authorization or project."

Clearly, DFN cannot understand the project and identify concerns and potential environmental impacts; if we do not have adequate time to review the documents. DFN is requesting a two-week extension from the MVLWB for DFN to provide comments by April 16, 2019.

If you have any questions or comments regarding DFN's letter, please contact Nicole Hardisty at 867-695-2355 or Nicole_hardisty@dehcho.org.

Mahsi cho,



Carrie Breneman
Environmental Consultant for Dehcho First Nations

on behalf of

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