

## Reviewer Comments and Proponent Responses

Project: CZN All-Season Road  
 Board: Mackenzie Valley Land and Water Board  
 Organization: CanZinc Corporation (CZN)

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
<b>GNWT-ENR - EAM (Environmental Assessment and Monitoring) - Environmental Regulatory Analyst</b>					
1	ENR Cover Letter	Please see attached cover letter.	N/A	No response required.	
2	Timelines – General	Canadian Zinc Corporation (CZN) has been completing work on the winter road in recent months. It is unclear how the road construction is progressing and whether there may be any required updates to the Closure and Reclamation Plan (CRP) based on the work done this season. Additionally, in a meeting with CZN in the fall of 2022, it was communicated that the required management plans for Phase 2 would begin to be submitted in the fall/winter of 2022/2023, and engagement with parties would be conducted prior to submission of management plans to ensure strong submissions. ENR notes that we have not received requests for any such engagement, and no management plans for Phase 2 have been circulated for review. It is unclear if the intention is still to commence work on the Phase 2 activities in fall 2023.	ENR recommends that CZN provide an update on the schedule for both Phase 1 and Phase 2 of the Project. This should include a discussion of what updates to the CRP are required.	The Phase 1 Winter Road is currently being constructed with the schedule to complete the work and the investigation in 2023. The purpose of the winter road is to be able to complete the investigation required and collect information that will be used for the completion of the design of the All Season Road. The Phase 2 activities are currently still intended to start in 2023.	See Board Decision to CIRNAC, comment 2.
3	Uncertainties and Contingencies	In conformity tables, CZN referenced Sections 2.6 and 2.7 for information on uncertainties and contingencies. ENR only found mention of uncertainties related to watercourse crossings. As indicated in the June 2022 conformity table, this requirement is meant to address the uncertainties in closure planning. Additional detail is needed in order to fulfill this Water Licence requirement.	ENR recommends that CZN include information on uncertainties and contingencies related to closure planning as required under Schedule 5 (j)viii.	Uncertainties and contingencies pertaining to closure planning will be further discussed in sections of the CRP as appropriate.	Board directive requiring CZN to further discuss information on uncertainties and contingencies related to closure planning to address the requirement in the Permit and Licences.
4	Closure Cost Estimate	The Conformity Table for the Licence Conditions indicates that the closure cost estimate will be submitted under a separate cover. ENR notes that	ENR recommends that CZN clarify when they intend to submit an updated closure cost estimate.	There has been no change to the assumptions that were used for the securities required for the	The Board directs CZN to update the CRP to include a link to the most recent Closure Cost Estimate for the

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		it is not clear when this will be submitted.		closure cost estimate that is on the registry <a href="https://registry.mvlwb.ca/Documents/MV2014L8-0006/MV2014F0013%20MV2014L8-0006%20MV2019L8-0002%20-%20Canadian%20Zinc%20-%20Final%20Security%20Estimates%20-%20Oct%203_19.pdf">https://registry.mvlwb.ca/Documents/MV2014L8-0006/MV2014F0013%20MV2014L8-0006%20MV2019L8-0002%20-%20Canadian%20Zinc%20-%20Final%20Security%20Estimates%20-%20Oct%203_19.pdf</a> The scope of work has not changed and therefore the cost estimate has not changed for the Phase 1 Winter Road.	Phase 1 ASR. If applicable for the next version of the CRP, CZN should indicate in the conformity table that the closure cost estimate was not updated.
5	Progressive Reclamation	Section 4.0 states that “should CZN not proceed with the Project beyond this point, the winter road may be used for several more years to support closure and reclamation of the Mine site. ENR notes that this has not been included in the scope for Phase 1 in the Licence, nor in the management plans.	ENR recommends that CZN clarify if they are seeking this addition to the scope of Phase 1. If not, this language should be removed from Section 4.0.	This text can be removed from the Phase 1 WR CRP, but CZN thought it was important for interested parties to note that in the event that the mine shuts down, the WR may provide the only existing overland access to the mine for closure and reclamation purposes.	The scope of the ASR Licences and Permit includes the following: “Construction, operation, and maintenance of an All Season Road, including the Construction, operation, and maintenance of a temporary Winter Road”. Further, the Licences and Permit includes phases that are used in conditions throughout the authorizations. The definition of Phase 1 is “activities to support the Construction of the All Season Road in Phase 2, including the Construction and operation of the Winter Road to conduct geotechnical investigation and transport equipment and materials to Prairie Creek Mine.”  The authorizations do not contemplate the winter road being used to support closure and reclamation of the mine site. Therefore, the Board directs CZN to remove the text from the Plan.
6	Progressive Reclamation	It is not clear from Section 4.0 when progressive reclamation will begin and/or occur within the	ENR recommends that CZN clarify when progressive reclamation will	As noted in section 4.0 of the CRP, progressive reclamation takes	The response does not address the question about when progressive

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	Timing	span of operations.	begin or what milestones will trigger the start of progressive reclamation.	place prior to permanent closure of the WR to reclaim components and/or decommission facilities that no longer serve a purpose. These activities can be completed during operations with the available resources to reduce future reclamation costs, reduce the duration of environmental exposure, and enhance environmental protection. Progressive reclamation is expected to help shorten the time for achieving final closure objectives and will provide valuable experience on the effectiveness of certain measures that might be implemented during permanent closure.	reclamation will begin or what milestones will trigger the start of progressive reclamation.  As per Schedule 5, Condition 1 k) in Licence MV2014L8-0006, Schedule 4, Condition 1 k) in Licence MV2019L8-0002, and Condition 109 in Permit MV2014F0013, CZN should include: A description of any planned Progressive Reclamation, including, but not limited to: i. Progressive Reclamation goals and objectives; ii. A description of activities (including timing) and methods (including techniques and materials); iii. A description of an Adaptive Management framework that satisfies the requirements of Report of EA Appendix B; iv. Contingencies; and v. An implementation schedule.
7	Closure Timing	Section 5.0 indicates that “This deactivation plan outlines the procedures and schedule on the basis that ASR [all-season road] construction will be executed within the next two years. This CROP [sic] has been developed to address a situation in which CZN becomes insolvent and the mine site and WR [winter road] alignment requires long term reclamation.” ENR notes that it is unclear if all-season road construction not being executed within two years would trigger closure and reclamation. If not, it is not clear how long the project may be in a state of deactivation prior to closure and reclamation being carried out.	ENR recommends that CZN clarify whether all-season road construction not being executed within two years would trigger closure and reclamation of the winter road. If not, ENR recommends that CZN clearly state how long the winter road could remain in a state of deactivation prior to closure and reclamation being carried out.	As noted above and in section 4.0 of the CRP, progressive reclamation activities associated with the stabilization of Non-typical WR side slopes and cut slopes to maintain safe working conditions and to facilitate reclamation activities. Sections of the Phase 1 WR would remain in a state of seasonal deactivation and an operational mode in the winter until such time as Phase 2 ASR construction has been completed.	It is also unclear what CZN means by “Phase 1 WR would remain in a state of seasonal deactivation and an operational mode in the winter until such time as Phase 2 ASR construction has been completed”. As described in the Board Decision for GNWT-ENR, comment 5, the ASR authorizations specify that the purpose of the Phase 1 winter road is to conduct geotechnical investigation and transport equipment and materials to Prairie Creek Mine. An amendment to the authorizations may be warranted if CZN may intend to use the winter road for other purposes until the ASR is built.  CZN should clarify the statement

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					about the winter road remaining in a state of seasonal deactivation and an operational mode in the winter until the ASR has been constructed, including the maximum possible time in this scenario and what the “operational mode” will entail. Parties should have the opportunity to comment on these details.
8	Post-Deactivation Monitoring	Section 5.1.5 states that “The post-deactivation monitoring frequency is defined in the SECP [Sediment and Erosion Control Plan].” ENR was unable to find this information in the SECP.	ENR recommends that CZN provide a detailed reference to the appropriate section of the SECP that includes the post-deactivation monitoring frequency. ENR recommends that CZN provide the monitoring frequency that is or will be included in the SECP if it’s not already presented within that document.	CZN will check the reference to the SECP and address if necessary.	Deactivation monitoring is discussed in Section 6.1.2 of the SECP. From reviewing this section of the SECP it is unclear to the Board if the frequency of monitoring is defined (discusses monitoring if there is a clear runoff response at more than one hydrometric flow station).  The Board directs CZN to update Section 5.1.5 to provide detailed reference to the section of the SECP that includes the post-deactivation monitoring frequency.
9	Closure Principles and Objectives	Table 5 presents closure objectives, criteria and measurement methods. The table presents what appear to be overarching Objectives, with a more detailed breakdown of objectives below. ENR notes that it seems as though closure objectives are being used interchangeably with closure principles in the bolded headings in the table. Closure principles and objectives are defined in the Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (MVLWB/AANDC, 2013).	ENR recommends that CZN refer to the definitions in the Closure Guidelines (MVLWB/AANDC, 2013) and revise Table 5 closure objectives accordingly.	The Table 5 Closure Objectives will be revised as recommended by GNWT ENR.	The Board directs CZN to update Table 5 Closure Objectives according to the definitions used in the Closure Guidelines.
10	Closure Criteria	There is a lot of information presented in the closure criteria column of Table 5. It’s not clear which language is intended to be used as the criteria itself. Closure criteria should be clarified.	ENR recommends that CZN clarify the closure criteria in Table 5, and ensure they are clear and capable of measuring whether closure objectives have been met.	The Table 5 Closure Criteria will be revised to ensure they are clear and capable of measuring whether closure objectives have been met, as recommended by GNWT	The Board directs CZN to update the closure criteria to ensure they are clear and capable of measuring whether closure objectives have been met.

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11	Chemical Stability – Water Quality	In Table 5, the first row under Objective 2 relates to surface runoff water quality. Both criteria reference criteria in the licence. Water Licence MV2014L8-0006 only has limits for total suspended solids (TSS), while MV2019L8-0002 does not appear to have any surface water quality criteria. ENR notes that for closure, it will be important to include other parameters in closure criteria. The second criterion specifically states that “ARD [acid rock drainage] and or ML [metal leaching] concerns addressed to ensure Water Licence Criteria are met.” It is not clear how it would be confirmed that acidity or metals are not of concern if the only limits are for TSS. Additionally, a sampling timeline of two years has been proposed in the first criterion. It is not clear how it was determined that two years of sampling would be sufficient to demonstrate that all parameters are stable and at safe levels.	ENR recommends that CZN propose additional surface water quality limits for closure criteria. In particular, these should include any parameters needed to assess whether there may be ARD or ML concerns. ENR recommends that CZN provide the rationale for the two year sampling timeline for surface water quality.	As requested by ENR, CZN will propose additional surface water quality limits for closure criteria. In particular, these will include any parameters needed to assess whether there may be ARD or ML concerns. CZN anticipates that within one or two years, water quality at all streams to be crossed or affected by the Phase 1 WR will have returned to natural background values.	The Board directs CZN to propose additional surface water quality limits for closure criteria, including any parameters needed to assess whether there may be ARD or ML concerns. CZN should provide rationale in the next version of the CRP for the two-year sampling timeline used for the criteria for surface water quality, including evidence that water quality at stream crossings will return to natural background values.
12	Chemical Stability – Air Quality	In Table 5, the second row under Objective 2 relates to air quality. The first criterion states that “Ambient air quality will meet the Northwest Territories Ambient Air Quality Standards (NWTAAQS) as demonstrated by monitoring during Closure.” ENR notes that it is not clear what air quality monitoring will take place during closure. If this is detailed in another plan, that plan should be referenced. Otherwise, additional information should be included within the CRP and that section should be referenced in the table.	ENR recommends that CZN provide additional detail on the air quality monitoring that will occur during closure.	As noted in Table 5, air quality monitoring for suspended particulates and dustfall will be conducted during Closure, and a vegetation dustfall monitoring event will be undertaken two years Post-Closure.	No additional details were provided by CZN in response to GNWT’s recommendation.  The Board directs CZN to provide additional details in the CRP about the air quality monitoring that will occur during closure.
13	Infrastructure Closure Objective	Various subsections of Section 6.4 discuss the removal of materials such as culverts, temporary bridge structures, and camp infrastructure. ENR notes that there is no closure objective in Table 5 for the removal of these items.	ENR recommends that CZN add a closure objective for the removal of materials such as culverts, temporary bridge structures, and camp infrastructure.	As requested by GNWT ENR, CZN will add a closure objective for the removal of materials such as culverts, temporary bridge structures, and camp infrastructure to Section 6.4 of the CRP.	The Board directs CZN to update Table 5 to include the removal of materials such as culverts, temporary bridge structures, and camp infrastructure as a closure objective.

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14	Residual Hydrocarbon Contamination – Bio-Remediation	Section 6.4.6 refers to in situ bio-remediation being used to treat spills along the Tibbitt to Contwoyto Winter Road. However, there are no details provided about the nature of the spills where these methods were used successfully (nature of spill, volume/areal extent, time since spill occurred, etc.). It is also unclear under what circumstances CZN would use these methods for the Phase 1 winter road.	ENR notes that if CZN intends to employ bio-remediation to treat spills, additional details should be provided in the CRP and in the Spill Contingency Plan.	In-situ bioremediation of hydrocarbon contaminated sites would typically only be applied in more remote areas where residual hydrocarbons (typically diesel) from a winter spill have seeped into the surface soils. In situ bioremediation (using ‘bugs in a bag’ and nutrients) is preferable to excavation and removal of the hydrocarbon contaminated soils. Follow-up treatments and monitoring of remediation effectiveness and surface runoff water quality would occur annually until effective bioremediation has been achieved.	The Board directs CZN to update the CRP with the additional details of the proposed in-situ bioremediation of hydrocarbon contaminated sites.
15	Reclamation Trials	Section 6.5 indicates that “Reclamation trials are anticipated to be implemented after the WR only if the Project is not proceeding to Phase 2.” ENR notes that it is not clear why reclamation trials would only be implemented if the Project is not proceeding to Phase 2. Results from reclamation trials will be useful for future activities even if Phase 2 proceeds. There are several segments of the winter road alignment that do not overlap with the all-season road alignment, and these could be used for reclamation trials while still allowing Phase 2 to proceed.	ENR recommends that CZN carry out reclamation trials after the winter road is completed, regardless of whether Phase 2 proceeds. In the event that Phase 2 proceeds, segments of the winter road that do not overlap with the all-season road alignment could be used for the reclamation trials.	CZN concurs with GNWT ENR’s recommendation that reclamation trials can and should be undertaken for the winter road and section 6.5 will be revised accordingly.	The Board directs CZN to update Section 6.5 to describe the reclamation trials to be conducted after the winter road is completed, regardless of whether Phase 2 proceeds.
16	Moderate and High Action Levels	Section 6.7 indicates that “It is understood that at this time, only the Low Action Levels need to be set in advance of actually measuring an environmental change.” ENR notes that all action levels should be set in advance. If medium and high action levels are not set until a low action level is exceeded, the situation may deteriorate to an unacceptable condition in the time that it takes to set the moderate and high action levels and plan mitigative actions. If all action levels are	ENR recommends that CZN set all action levels in a revised version of the CRP.	Section 6.7 of the Phase 1 WR CRP will be updated to provide discussion the proposed moderate and high action levels.	The Board directs CZN to update Section 6.7 to provide a discussion on proposed moderate and high action levels.

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		set in advance, it will help ensure a prompt and appropriate response when an environmental change is measured.			
17	Action Levels – Vegetation	The action levels proposed for vegetation in Table 6 are all based on results after the first five years. ENR notes that if vegetation establishment is poor, it should be possible to detect this prior to five years. The earlier this can be detected, the earlier additional action can be taken to help support revegetation and move toward the completion of revegetation closure criteria.	ENR recommends that CNZ revise the revegetation action levels so that poor revegetation may be detected earlier and action may be taken earlier.	CZN will revise the revegetation action levels so that poor revegetation may be detected earlier and action may be taken earlier.	The Board directs CZN to update the action levels presented in Table 6 so that poor revegetation may be detected earlier than in the first five years.
18	Action Levels	Table 6 only includes action levels for vegetation. ENR notes that action levels should also be included for other aspects of winter road closure and reclamation.	ENR recommends that CZN include action levels for other aspects of winter road closure and reclamation in a revised version of the CRP.	Proposed action levels for other closure criteria outlined in Table 5 will be incorporated as appropriate in section 6.7 or reference will be made to where they can be found in other CZN management plans.	The Board directs CZN to update the action levels presented in Table 6 to include other closure criteria outlined in Table 5.
19	Closure and Reclamation Goal and Principles	The CRP's Closure Principles include Physical Stability; Chemical Stability; No Long-term Active CRP Requirements; and Future Uses.	Given that the WR overlaps with boreal caribou and northern mountain caribou ranges, ENR would like to see a closure principal that considers the restoration of caribou habitat to pre-disturbance conditions.	As requested, CZN will incorporate a closure principal that considers the restoration of caribou habitat to pre-disturbance conditions in the next version of the Phase 1 WR CRP.	The Board directs CZN to update the CRP to include a closure principle that considers the restoration of caribou habitat to pre-disturbance conditions, as committed to by CZN.
20	Primary Reclamation Activities – 'Rough and Loose'	The primary reclamation activities proposed in the CRP are: application of the 'rough and loose' approach; spreading of woody debris; and restoring streams and natural drainage channels to the natural stable condition. The WR is in the discontinuous permafrost zone. The application of the 'rough and loose' approach may be inappropriate in areas with underlying permafrost and where vegetation and root systems remain intact. Disturbance to permafrost may result in long-term, irreversible changes in habitat important for boreal and mountain caribou.	ENR recommends that the application of the 'rough and loose' approach is employed only in areas of existing ground disturbance with no underlying permafrost, and wording to that effect be included in the CRP.	CZN concurs with tis recommendation and will update the CRP accordingly.	The Board directs CZN to update the CRP to indicate that the 'rough and loose' approach will only be employed in areas of existing ground disturbance with no underlying permafrost.
21	Primary Reclamation	The CRP describes various methods of site preparation required to rehabilitate site	The CRP should consider the impact the reclamation plan may have on	CZN concurs with GNWT ENR's comment related to the	In the above comment, CZN committed to only using the 'rough

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	Activities – Natural v’s Active revegetation	conditions and make them conducive to “natural” revegetation. Section 6.4.1 states that “The anticipated rapid re-establishment of pioneering species such as Willows, Poplars, Alder, etc., will lead to the production of vegetation covers comparable to the current climax vegetation covers found adjacent to the ROW.” The natural ingress of deciduous saplings, such as willows, into existing disturbed areas may act to enhance alternate prey presence and increase predation risk to caribou.	caribou habitat in terms of increased predation risk. Section 1.6.3 states that CZN is committed to conformance with Park Canada’s Principles and Guidelines for Ecological Restoration in Canada’s Protected Natural Areas (Parks Canada 2008). In practice, active ecological restoration may involve site preparation, creating favourable microsites using woody debris, and planting or seeding with native species that are characteristic of pre-disturbance conditions. Existing caribou habitat restoration documents that might support the proponent in restoring caribou habitat include the Framework for Boreal Caribou Range Planning, the Boreal Caribou Wek’èezhìi Interim Range Plan, and Preliminary Tactical Restoration Plan for the Pink Mountain Caribou Herd – Caribou Tactical Restoration Plan.	restoration of caribou habitat and notes that the application of the rough and loose approach, which will contribute to the creation of favourable microsites using woody debris, and will also serve to impede predator-prey interactions, will likely result in a potential decrease in the the loss of caribou to predation. This will be further clarified in the next version of the Phase 1 WR CRP.	and loose’ approach in areas of existing ground disturbance with no underlying permafrost.  The Board directs CZN to update the CRP to describe how the reclamation methods used will support caribou habitat restoration, including the commitment that the rough and loose approach will only be employed in areas of existing ground disturbance with no underlying permafrost.
22	Primary Reclamation Activities – Movement Barriers and Visual Barriers	Linear disturbance features are of particular risk to caribou as they reduce security habitat and improve both the movement and visibility of predators, in particular wolves.	ENR recommends that habitat be restored to create functional habitat for caribou. Line blocking treatments such as piling slash and debris or bending trees over the WR to reduce line of sight to <200 m should be included as a primary reclamation activity to restore functional caribou habitat by creating both a movement and visual barrier to predators such as wolves.	See response to GNWT Item 21	See Board Decision to GNWT-ENR, comment 21.
23	Closure Criteria – Movement	Table 5 of the CRP states that “successful completion will be measured by achieving 50% pioneer vegetation cover on Non-Typical WR	ENR would like to see closure criteria that considers the requirements for caribou habitat	See response to GNWT Item 21	See Board Decision to GNWT-ENR, comment 21.



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	Barriers and Visual Barriers	sections, WR camp sites and other disturbed areas in the first five years.” Recent studies in Alberta have found that vegetation heights of 0.50-0.70 m were sufficient to reduce wolf selection for linear features and movement speeds on linear features. For caribou habitat restoration, vegetation regrowth on linear disturbances needs to meet certain density criteria to impede predator movements. Draft guidelines from Alberta recommend tree regeneration densities of 800 stems/ha on dry uplands and lowland low density treed (e.g., open fens) sites, and 1,000 stems/ha on upland, transitional and lowland treed (e.g., black spruce bog) sites.	restoration. Existing caribou habitat restoration documents that might support the proponent in restoring caribou habitat include the Framework for Boreal Caribou Range Planning, the Boreal Caribou Wek’èezhì Interim Range Plan, the draft Guidelines for Exploration and Development Projects in Boreal Caribou Habitat in the Northwest Territories, and Preliminary Tactical Restoration Plan for the Pink Mountain Caribou Herd – Caribou Tactical Restoration Plan.		
24	References	Mackenzie Valley Land and Water Board (MVLWB)/Aboriginal Affairs and Northern Development Canada (AANDC). 2013. Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories	N/A	CZN thanks GNWT ENR for the references provided	Noted.
25	References	Ministry of Forests, Lands, Natural Resource Operations and Rural Development. 2021.Preliminary Tactical Restoration Plan for the Pink Mountain Caribou Herd Caribou Tactical Restoration Plan. pink_mountain_tactical_restoration_plan.pdf (gov.bc.ca)	N/A	CZN thanks GNWT ENR for the references provided	Noted.
<b>CIRNAC (Yellowknife) - Megan Larose</b>					
1	Design for Closure	Section 6.1 and Section 6.4 of the Closure and Reclamation Plan indicate that the winter road alignment has been based on a "design for closure" approach, with the ultimate goal being a "walkaway" design. No examples or discussion have been provided on how this has been done or how these approaches have informed the design of the winter road.	Elaborate further on how the "design for closure" approach has been used in the design of the winter road.	Most of the WR will be constructed using the standard approach to northern winter road construction, which will involve clearing the WR alignment of trees and brush with the tree stumps, roots, shrubs and ground cover typically being left in place, as	Noted.

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				recommended by the Northern Land Use Guidelines – Access: Roads and Trails (GNWT Lands 2015). This will facilitate the natural recovery of the existing vegetation cover. This will be followed by using snow, ice, flooding and compaction over the frozen terrain to form a solid road prism. Temporary Ice bridges will be constructed across most streams/rivers and a few streams will have temporary bridge structures installed that can readily be removed. The design approach is included in the Phase 1 Winter Road Design and Construction Plan.	
2	Section 2.3 Current Status of the Project	Construction of the winter road is well underway. The Closure and Reclamation Plan should include an updated version of Section 2.3 to more accurately reflect the current status of the project, including a summary of work completed to date and anticipated milestones.	The Closure and Reclamation Plan should include an updated version of Section 2.3 to more accurately reflect the current status of the project, including a summary of work completed to date and anticipated milestones.	Section 2.3 will be updated to reflect the current status of winter road construction prior to issue of the next version of the CRP.	Board directive to update section 2.3, and any other sections of the Plan as appropriate, to reflect the current status of the winter road construction, including when Phase 2 activities are intended to begin, as discussed in response to GNWT-ENR, comment 1 and GNWT-Lands, comment 4. This includes the following specific directives: remove the sentence in section 2.3 that begins “When the project does commence with a WR...” (GNWT-Lands, comment 11); and update section 2.5 to indicate that clearing began in 2022 not 2021 (GNWT-Lands, comment 12).
3	Undefined acronyms or spelling errors	The acronym PWR is used in the document in Section 2.9, and Section 6.4.3. The acronym CROP is used in Section 5.0. These acronym are not defined in the acronym and abbreviations table. It is assumed these may be minor typo's and are	Correct the minor typos in the text or update the acronym and abbreviations table as appropriate.	The minor typos in the text have already been corrected and the acronym and abbreviations table will be updated as appropriate.	Board directive for CZN to ensure correct acronyms are used throughout the Plan (including clarifying the acronyms CROP, PWR).

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		meant to be a reference to the winter road (WR) and the closure and reclamation plan (CRP); however, this should be confirmed and corrected as needed in the document.			
4	Section References	It appears that the incorrect section may be referenced in a few locations in the document, particularly in Section 6. For example, Section 6.1 Closure Approach and Reclamation Goals refers to Section 1.5 Incorporation of Dene Knowledge; however, based on the context of the paragraph it seems that the applicable reference would be to Section 1.6 Closure and Reclamation Plan Goal and Principles. Section 6.4 refers to Section 2.1 and Section 1.5; however, Sections 2.5 and 1.7 may be the more applicable section references.	Confirm the references to other sections of the CRP are correct throughout the document.	The references to other sections of the CRP will be corrected as appropriate throughout the document.	Board directive for CZN to correct references to other sections throughout the CRP.
5	Figure Reference	Section 6.7 refers to Figure 10 (adapted from WLWB 2010); however a Figure 10 is not included in the document or in the table of contents.	Confirm the figure references in Section 6.7 are correct.	Figure 10 has been removed from the CRP.	Board directive for CZN to remove or clarify the reference to Figure 10.
6	Section 6.4 Reclamation of Winter Road	Section 6.4 indicates that the predicted environmental effects associated with the closure and reclamation of the winter road are generally expected to be of a relatively short-term (1-5 years) and reversible nature. The subsequent sections provide information about how environmental effects will be addressed/remediated; however, information about what the anticipated environmental effects are is not clearly communicated.	Provide additional information about what the predicted environmental effects associated with the winter road are, in addition to how they will be addressed.	The predicted environmental effects associated with winter road construction and operation were reviewed in detail by the Mackenzie Valley Environmental Assessment and Review Board in their Report of Environmental Assessment and Reasons for Decision through EA0809-002. "Quoting from the reports Executive Summary, "The Review Board accepts the evidence from Canadian Zinc Corp. that construction and use of the winter access road will not have significant adverse impacts on the land, the water or wildlife along its route provided the developer's commitments are implemented".  CZN is committed to conforming with the MVEIRB's conditions and	The Board directs CZN to update the CRP to reference the predicted environmental effects associated with winter road construction that were considered by the Review Board in EA0809-002 and discuss any EA measures and commitments made by CZN to address the predicted effects associated with winter road construction.

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7	Section 4.0 Progressive Reclamation	The progressive reclamation section talks about identifying areas along the winter road alignment where progressive reclamation could take place; however, little detail is provided regarding what those progressive reclamation activities are, and where they will take place. The second paragraph of this section indicates that if CZN decides not to proceed with the Project, the winter road may be used for several more years to support closure and reclamation of the Mine site prior to final reclamation. This is not discussed in any other section of the Closure and Reclamation Plan and it is unclear if this has been discussed in the broader context of the Project. The winter road is designed for use in one winter season only and Section 2.2 indicates that the WR will not be an operational road; specifically, no hauling of mine supplies or related traffic to or from the Mine will occur during Phase 1. It is unclear how a winter road, designed for one-season use, would support several years of Mine closure (e.g., anticipated multiple trips up and down the winter road alignment with heavy loads/equipment associated with mine closure) without further engagement and regulatory review.	Elaborate on the plans for progressive reclamation and the anticipated activities/timing for closure and reclamation of the winter road in the context of the decision not to proceed with the project. The topic of using the winter road for the purposes of Mine closure requires more discussion than one sentence in this section, it is suggested that more details be provided or this statement be removed.	recommendations. Details regarding where progressive reclamation will be needed and the nature of the efforts required will be clarified once this winter's WR construction program has been completed. Progressive reclamation may be completed if there is opportunity to do so and will be determined after the completion of the construction as the construction period is only months long. The current plan remains to convert the WR into an All-Season Road (ASR) for mine operations, but the timing remains fluid. CZN understands that if plans change and the ASR is not constructed, that further engagement and regulatory review would be required to use the WR for Mine closure activities.	See Board Decision to GNWT-ENR, comments 6.
<b>Environment and Climate Change Canada (ECCC) - Melissa Pinto</b>					
1	Acidic drainage and metal leaching	References: 1. Closure and Reclamation Plan – Phase 1 Winter Road – Prairie Creek Mine (Tetra Tech; October 6, 2022) 2. December 6, 2022 letter and technical comment submission from ECCC to the MVLWB re: PC2014F0013 & PC2014L8-0006 – CanZinc Corporation – Prairie Creek All Season Road – Winter Road Closure and Reclamation Plan Version 1. 3. December 20, 2022 responses from Canadian Zinc Corporation to MVLWB re: PC2014F0013 &	Regarding the Geochemical Verification Program for overburden granular materials along the proposed winter road, ECCC recommends that the Proponent clarify whether the samples collected are representative of all granular material types that will be encountered along the road. If the samples are not, additional sampling should be conducted until	These items are all addressed in the Geochemical Verification Plan (GVP) management plan.  These items are all addressed in the Geochemical Verification Plan (GVP) management plan. • 42 samples were analyzed, and they do capture the full range of all granular types that are expected to be encountered along the road construction.	Adequate response. The recommendation by ECCC appears to be more related to the GVP for Phase 1 which already went through a public review process.  Board directive for CZN to incorporate the Geochemical Verification Program details into Section 3.6 of the CRP (e.g., a small summary and reference to the GVP).

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		<p>PC2014L8-0006 – CanZinc Corporation – Prairie Creek All Season Road – Winter Road Closure and Reclamation Plan Version 1.</p> <p>Section 3.6 (Geochemical Conditions) provides a brief overview of the Geochemical Verification Program for overburden granular materials along the proposed winter road, and program results. Eighteen samples were selected to undergo geochemical characterization testing. However, the Closure and Reclamation Plan does not indicate whether these samples are representative of all granular material types that will be encountered along the proposed winter road. Clarification should be provided.</p> <p>This section also discusses neutralization potential and states that silicate and carbonate minerals are present in sufficient quantities to neutralize against acid production and maintain near-neutral or alkaline drainage. ECCC notes that silicate alteration/reactions is very slow and should not be relied on as the sole neutralization potential material. Further discussion should be provided on this topic.</p> <p>Section 3.6 notes that elevated levels of iron and aluminum may be observed at some locations. The conditions and drainage quality at such locations should be monitored.</p> <p>In response to ECCC’s comment and recommendation, the Proponent responded as follows: “The brief summary of the activities, sampling and results as included in the Geochemical Verification Plan can be included in the CRP. Activities, monitoring and sampling and any follow-up monitoring should be managed through the Geochemical Verification Program.”</p>	<p>all granular material types to be excavated have been sampled and analyzed. Sampling depth should be guided by how deep the excavation will be.</p> <p>ECCC recommends that the Proponent does not rely on silicate alteration/reactions as the sole neutralization potential material. Additional information should be provided on this topic, including other neutralization potential material that is available.</p> <p>For any locations with elevated levels of iron and aluminum, ECCC recommends that conditions and drainage quality be monitored and mitigations provided as needed to prevent acidic drainage and metal leaching.</p> <p>In addition, ECCC’s recommendations should be addressed in the next update of the Geochemical Verification Program.</p>	<ul style="list-style-type: none"> <li>• The majority of neutralization potential is from carbonate sources. The non-acid generating classification do not rely on silicate or other non-carbonate forms of NP. The is discussed in the GVP.</li> <li>• Aluminum and iron are addressed, and the interpretation of the results discussed including that they are not considered of particular environmental concern.</li> <li>• There is a water quality monitoring program to evaluate possible iron or aluminum (or other parameters). Mitigation and management will be implemented as needed, and as discussed in the GVP and the Water Monitoring Plan. This information will be incorporated into Section 3.6 of the updated Phase 1 WR CRO as appropriate.</li> </ul>	
2	Water quality	References:	ECCC recommends conducting	CZN is committed to monitoring	ECCC’s comments about the water

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	monitoring	<p>1. Closure and Reclamation Plan – Phase 1 Winter Road – Prairie Creek Mine (Tetra Tech; October 6, 2022)</p> <p>2. December 6, 2022 letter and technical comment submission from ECCC to the MVLWB re: PC2014F0013 &amp; PC2014L8-0006 – CanZinc Corporation – Prairie Creek All Season Road – Winter Road Closure and Reclamation Plan Version 1.</p> <p>3. December 20, 2022 responses from Canadian Zinc Corporation to MVLWB re: PC2014F0013 &amp; PC2014L8-0006 – CanZinc Corporation – Prairie Creek All Season Road – Winter Road Closure and Reclamation Plan Version 1.</p> <p>The Closure and Reclamation Plan does not indicate whether water quality monitoring will be conducted during closure and reclamation. The plan should be updated to include such information.</p> <p>In response to ECCC’s comment and recommendation, the Proponent responded as follows: “Monitoring of any ongoing water quality issues is a component of the Water Management Plan. This work will continue after the deactivation of the WR and as required and determined in the Water Management Plan. A summary of these activities can be included in the CRP in the future and may inform closure activities.”</p>	<p>ongoing water quality monitoring of site drainage and surface water for any locations where contaminants may become mobilized, including any locations with potential for acidic drainage, metal leaching, erosion, or sedimentation, and in aquatic receiving environments. Monitoring results should be compared to proactive trigger levels that, if reached, will prompt response measures to protect the aquatic environment.</p> <p>In addition, ECCC’s recommendation should be addressed in the next update of the Water Management Plan.</p>	<p>the water quality of site drainage and surface water for any locations where contaminants may become mobilized. This will be reflected in future editions of the Water Management Plan.</p>	<p>monitoring details being addressed in the next update of the Water Management Plan should be made during the next review for the Water Management Plan.</p> <p>The scope of the Phase 1 management plans does not include closure, and any water monitoring related to the Phase 1 CRP that is tied to water quality criteria, and associated action levels, should be presented in the CRP. The water monitoring proposed in the CRP related to closure criteria does not have to be the same as the monitoring approach approved through the Water Monitoring Plan Version 3.3 (V3.3). If monitoring related to closure criteria is the same as that approved through the Water Monitoring Plan V3.3, CZN should be explicit in discussing this in the CRP and referencing appropriate sections of the Water Monitoring Plan V3.3.</p>
<b>GNWT-Lands - Katie Rozestraten</b>					
1	CRP requirement for Licence of Occupation	The Department of Lands has reviewed and commented on CZN's closure and reclamation plan given its role in land use regulation under the MVRMA and because the plan must also be approved as a condition of CZN's Licence of Occupation that was issued by the Department of	Please incorporate and address all reviewer comments as necessary into the next version of the CRP as the CRP is also required under the LOO.	As requested by the GNWT Lands, your Department’s comments will be incorporated as appropriate into the next version of the CRP.	Noted.

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		Lands for the construction of the road in October 2022.			
2	Typo p.xiv	"...Phase 2 construction is expected to being following Phase 1." 'being' should be switched to 'begin'	Fix typo 'being' to 'begin'.	The identified typo has been corrected for the next version of the CRP.	Board directive to fix the typo on p.xiv.
3	Rough and Loose Definition p.xxi	<p>"This approach will primarily be implemented for reclamation of the ASR, which can be undertaken during the summer/fall months when the ground is unfrozen."</p> <p>1. Consistent terminology should be used regarding Phase 1 and Phase 2. In this plan, CZN has chosen to define Phase 1 as WR (winter road); therefore, the rough and loose definition should state that the approach is for reclamation of the WR.</p> <p>2. This definition states that the activity can be undertaken during the summer/fall months when the ground is unfrozen. This is contrary to what's described elsewhere in the plan and that the rough and loose activity will occur when the ground is frozen (e.g. section 4 p.42). CZN should clarify whether this activity is happening on both frozen and unfrozen ground. If the activity is planned for unfrozen ground, CZN should explain how the activity and equipment used will not rut the ground and will not impact permafrost, organics/thermal layer, etc.</p> <p>3. Condition 55 of the permit - Vehicle Movement Freeze-Up states The Permittee shall not move any equipment or machines unless the ground surface is in a state capable of fully supporting the equipment or machine without rutting or gouging. The Rough and Loose definition should align with this condition.</p>	<p>1. Change ASR to WR in the rough and loose definition.</p> <p>2. Update the rough and loose definition so it reflects the activity will occur when the ground is frozen. If the intention is for the activity to also occur when the ground is unfrozen, CZN should provide the rationale elsewhere in the plan for why this activity is appropriate and that there is appropriate mitigation in place to ensure the ground is not negatively impacted.</p>	<p>1. the definition of rough and loose has been expanded to include: application of the rough and loose approach will also be implemented for Non-Typical WR sections, including side-slope and pull back areas, WR camp sites and other physically disturbed areas.</p> <p>2. The intention is to apply the rough and loose approach when the ground is unfrozen and appropriate mitigation, will be implemented as appropriate to ensure the ground is not negatively affected.</p> <p>3, As previously noted, it is our intention to apply the successfully demonstrated rough and loose approach for Non-Typical WR sections, including side-slope and pull back areas, WR camp sites and other physically disturbed areas.</p>	Board directive for CZN to update the definition of rough and loose to include the non-typical WR sections, including side-slope and other physically disturbed areas. The Board requires CZN to clarify that the rough and loose approach will be used when the ground is unfrozen. A description of mitigation measures that will be used to ensure the ground is not negatively affected should be included, including how the Permit condition Vehicle Movement Freeze-Up will be adhered to.
4	Section 1 - What if there	Section 1 states that "deactivation of the WR will commence immediately" after the geotech	The introduction should describe if and when further reclamation of	The Phase 1 WR CRP will be updated as appropriate to reflect	See Board Decision to CIRNAC, comment 2.

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	are project delays? p.1	<p>investigations are completed by mid-March. And that "no reclamation of the WR is anticipated to be undertaken" "on the assumption that construction of the ASR will commence in the following year."</p> <p>There is no discussion in this section to explain what would happen if construction of the ASR does not commence the following year. Would further reclamation of the WR need to occur? Would CZN request if further reclamation of the WR could be delayed by a year? Longer than that?</p> <p>The final sentence in the introduction states that the WR will only have a one-year life. However, if CZN is unable to get all of the geotech data it needs this year, will CZN need to build the WR again next year to get the remaining data?</p>	<p>the WR could occur if i) there are delays to starting construction of the ASR; ii) construction of the ASR is abandoned; iii) WR is needed for another season because CZN could not collect all the required geotech this season.</p> <p>If months are referenced, should specify the year as well so there is no confusion. Mid-March is for 2023?</p>	the status of the current winter road construction program, the plan for the winter of 2023/24 and construction of the subsequent ASR.	
5	Section 1.1 - Company Name p.1	In section 1.1 the company name is listed as "NorZinc Ltd. (formerly Canadian Zinc Corporation)". However, the issued authorizations in the NT have Canadian Zinc Corporation as the company name and is the registered corporation in the NT. If NorZinc Ltd. is the preferred company name, this company should be registered in the NT and then the authorizations should be updated.	The company name should correctly reference the name that is registered in the NT.	Canadian Zinc holds the authorizations and is a company under NorZinc. The information is correct.	Noted.
6	Engagement	Section 1.2 & 1.5 - ADKFN not mentioned	Please be sure to include ADKFN within your engagement.	CZN will engage with ADKFN on all aspects of the CRP that impact ADKFN's traditional territory.	The Board directs CZN to update sections 1.2 and 1.5 of the CRP to include ADKFN. This should include a discussion of ADKFN's preferred involvement in future CRP reviews in section 1.5.
7	Section 1.7 p.5 awkward phrasing - list all authorizations that need the	<p>"The main regulatory instructions required for closure and reclamation of the project include the following Land Use Permits (LUP) and Water Licences (WL):"</p> <p>The DFO authorization is mentioned in the list but</p>	Revise the sentence so it is clear it is a list of all the authorizations that require the CRP. The Licence of Occupation issued by Lands should be added to this list.	What is now Section 1.7 of the CRP will be updated as requested by GNWT Lands.	Board directive to CZN to update the regulatory requirements and guidelines to include all the authorizations that require a CRP.



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	CRP	it is not a LUP or WL. If the CRP is required under the DFO authorization, the sentence should be revised to identify that it is a list of authorizations not just LUPs/WLs. The CRP is also required under the Lands issued Licence of Occupation so should be added to the list.			
8	Section 1.9 ROC meeting minutes p.6	Are the Road Oversight Committee meeting minutes and recommendations being posted to the Board's public registry? It would be beneficial to the reviewers if this information was publicly available.	Please ensure the meeting minutes and recommendations from the Road Oversight Committee are publicly available on the Board's public registry.	Meeting minutes from the Road Oversight Committee are not provided publicly. CZN will inquire with the representatives of the committee whether they approve the minutes to be public.	Adequate response.
9	Section 2.1 Site History p.7	It is unclear why the site history stops after EA0809-002 and does not include EA1415-01 and the permitting process that followed for the ASR?	Please include the more recent site history so the EA for the all-season road and the subsequent permitting process is captured.	Section 2.1 of the CRP will be updated as recommended by GNWT Lands.	Board directive to CZN to update Section 2.1 to include the recent site history so the EA for the all-season road and subsequent regulatory process is captured.
10	Section 2.2 Use most recent access road map book p.7	Section 2.2 mentions that the WR alignment can be viewed in CZN's 2019 Access Road Map Book. However, CZN has a more recent map book appended to their approved Phase 1 Design & Construction Plan v2.1. The CRP should direct the reader to the most recent map book, i.e. the one in the approved Phase DCP.	Revise the map book reference to the approved Phase 1 DCP as that has newer information.	The reference to the map book in Section 2.1 of the CRP will be updated to Phase 1 Design & Construction Plan v2.1.	Board directive requiring CZN to update reference to the map book to the Phase 1 DCP V2.1.
11	Section 2.3 WR alignment	Section 2.3 says "When the project does commence with a WR, portions of the mostly still cleared 1980's alignment will be utilized, including the existing access road sections extending from KP 0 to KP 24 and KP 29 to KP 33."  Does the above statement align with the statement from section 2.2 that states "An important goal of the WR construction program will be to... confine the alignment to the proposed ASR footprint as much as possible..."	Please confirm that the statement in section 2.3 aligns with that in section 2.2.	CZN can confirm that the two statements are complementary and consistent.	The Board directive for CIRNAC, comment 2 about updating the CRP with the current project schedule should clarify the text referenced by GNWT-Lands. The Board has added a sentence to the directive for CZN to ensure that Section 2.3 no longer reads "When the project does commence with a WR...".
12	Section 2.5 - update date	Paragraph 3 in section 2.5 can be updated to 2022 as clearing did not begin in 2021.	Update 2021 to 2022.	Section 2.5 will be updated to reflect the actual date when clearing commenced in 2022.	See Board Decision to CIRNAC, comment 2.

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13	Section 2.8.2 Borrow pit	Section 2.8.2 says "No borrow pits will be required for any of the WR construction program."  Lands understands that CZN has a quarry permit linked to the ASR LUP. This quarry permit was required because CZN needed to make upgrades to the road near the mine site so the rest of the WR could be built. Therefore, the statement in the CRP is not correct and should be updated to reflect the one quarry that is being used for some work under Phase 1 of the road.	Please update the section to reflect that there is one quarry in operation to repair certain sections of the road during Phase 1 operations.	The use of the mine quarry and associated permitting is described in Section 2.9.	CZN should still update section 2.8.2 for clarity, as recommended by GNWT-Lands.
14	Section 2.9 (and global edit) use of PWR	There are 5 instances of "PWR" in the CRP, which starts in section 2.9. This is not a defined term and should be updated to "WR" as this is the term that is used elsewhere.	Global edit - replace "PWR" with "WR".	All references to PWR will be replaced as recommended.	See Board Decision to CIRNAC, comment 3.
15	Section 2.9 p.22 quarry pit	"To assist in PWR construction activities, additional rip-rap will be developed from the onsite quarry at the Mine site."  The quarry mentioned in this section is not within the lease boundary of the mine site. The quarry permit should also be posted under the road LUP. This sentence should be revised to reflect where the quarry is and that the quarry is being used for Phase 1 road activities.	Sentence should be revised to reflect that the quarry is a source for the road development and is being used in Phase 1 activities.	The referenced sentence will be revised as recommended.	The Board directs CZN to update the sentence in Section 2.9 to reflect where the quarry is that is referred to on p.22, and that the quarry is a source for the road development and is being used in Phase 1 activities.  The Board also directs CZN to submit the quarry permit to the Board so that it can be posted to the Public Registry for MV2014F0013.
16	Section 2.9 p.22 camp sites	"It is the intention to de-activate the camp sites at the conclusion of the WR season, not reclaim, and will be used again for the ASR construction."  There is no explanation in this paragraph about what should occur to the camp sites should CZN not proceed with ASR construction. Nor does CZN describe what type of gap could exist between Phase 1 & 2; is it 1 yr, 5 yrs? The amount of time deactivated but not reclaimed aspects of Phase 1 are allowed to go unreclaimed is an important	If camp sites are going to be used for Phase 2 and so won't be fully remediated at the end of the WR season, the CRP should specify that if it is decided that Phase 2 isn't moving forward the following year that the camp sites must be remediated unless there is a valid rationale for not doing so. The CRP should also describe how this remediation is to occur should	The Phase 1 WR CRP, including the status of any camp sites constructed for the WR will be updated as appropriate to reflect the status of the current winter road construction program, the plan for the winter of 2023/24 and construction of the subsequent Phase 2 ASR.	CZN's response did not include a commitment to remediate camp sites the following year in a scenario where it is decided that Phase 2 will not move forward.  The Board agrees with GNWT-Lands that the CRP for Phase 1 should describe how the campsites will be remediated should Phase 2 not proceed. The Board directs CZN to

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		<p>thing to consider and capture within the CRP.</p> <p>"Camp sites used for WR construction are anticipated to be used again for future winter road/ASR construction therefore reclamation of these will occur following Phase 2 or if it is determined that Phase 2 will not proceed."</p> <p>This sentence implies there could be future winter road seasons, yet this is not confirmed to date. If Phase 2 were not to proceed, it's unclear if there could be a multi-year gap before the winter road is constructed again. Given the overall uncertainty, the CRP should precisely describe how and when reclamation would occur for the camp sites. An ambiguous time line for camp site reclamation is not appropriate.</p>	Phase 2 not proceed.		<p>include this in the next version of the CRP for Phase 1. In response to the GNWT-Lands comment the Board directs CZN to specify how long the Phase 1 winter road could be in a state of deactivation/temporary closure before the campsites are remediated, including rational.</p> <p>It is imperative that reviewers including GNWT-Lands understand this information and have the opportunity to comment as it would be critical in the event that the project is abandoned and the land-owner is left to close the site.</p>
17	Old Grainger camp site	CZN made a commitment in EA0809-002 to remediate the Grainger Camp used during operation of the winter road in the early 1980s. This commitment is not explicitly discussed in the plan.	Clarify if CZN is planning to use the former Grainger Camp during the proposed Phase 1 road activities. Provide details on how the Grainger Camp will be remediated.	CZN did commit to remediate the Grainger Camp but did not specify that this would be during the Phase 1 construction. Trail access during winter is still required and is not part of the Phase 1 plan. Remediation will consist of removal of all equipment (tanks and culverts), and re-assessment of previously contaminated soil. Those activities are not scheduled for the winter road only use and will be incorporated into future plans.	Board directive to CZN to explain the timing and plans for the remediation of the Grainger Camp in the next version of the CRP so that the EA commitment referenced by GNWT-Lands is addressed. As this information is not directly related to the reclamation of the winter road, it could go under 2.0 Project Description.
18	Section 3.6 Geochemical Conditions p.32	<p>"The WR construction will include excavation of granular materials in cut and fill associated within 11 km of NTWRS construction."</p> <p>"However, in the unlikely event that any ARD material is used inadvertently for construction, it will be removed and replaced."</p> <p>It is not clear how it will be identified if ARD material is inadvertently used for construction;</p>	The CRP should identify how it will be known that ARD material is used inadvertently; how it will be removed; and where that material would go.	As can be recognized, this statement is a caveat, Based on the sampling and testing undertaken to ARD material will not be expected to be encountered and used in the approximately 11 km of Non Typical WR construction. Monitoring of NTWRS related to ARD is outlined	The Board requires CZN to update the statement noted by GNWT-Lands with a specific reference to the section of the GVP where monitoring of the NTWRS related to ARD is located (including how it will be known that ARD material is used inadvertently, how it will be removed, and where the material would go).

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		how it will be removed; and where that material would go.		in the GVP.	
19	Section 3.8.2 Invasive species. P.36	"The diligent application of the appropriate control measures will assist in managing infestation levels so that the construction, operation, closure and reclamation of the WR does not result in an increase in invasive species relative to local and regional background levels."  It is not identified what the 'appropriate control measures' could be. It also does not explain what would happen should invasive species be noted.	The CRP should clarify what the appropriate control measures are or where/what plan they are described in. The CRP should also clarify what is to be done should invasive species be noted.	As indicated in Section 3.8.2 of the CRP, CZN's Invasive Species Management Plan provides detailed identification and control measures for each of the 23 invasive species identified to date.	Adequate response.
20	Section 4.0 Progressive Reclamation	Section 4 states "Stabilization of WR side slopes and cut slopes to maintain safe working conditions and to facilitate reclamation activities. Slopes will be reduced to 2-3:1 where needed to control erosion and encourage natural revegetation." In the permit, condition 61 states that the ratio is 2:1.	Remove 2-3 and replace with 2:1 ratio.	As requested this revision will be incorporated in the next version of the Phase 1 WR CRP.	Board Directive for CZN to update Section 4.0 to indicate that slopes will be reduced to 2:1.
21	Section 4 - incomplete sentence? P.42	"As the WR is only planned for one winter season."  This sentence has no additional context. Is it supposed to be part of the preceding sentence on p.41?	Fix incomplete sentence.	This sentence will be fixed as necessary.	Board directive for CZN to update the incomplete sentence in Section 4.
22	Section 4 - multi-year winter road p.42	"However, should CZN not proceed with the Project beyond this point, the winter road may be used for several more years to support closure and reclamation of the Mine site prior to final reclamation, and there will be opportunities to implement progressive reclamation along certain portions of the WR.  In particular, progressive reclamation of the approximately 11 km of terrain anticipated to be disturbed by NTWRS construction, as discussed in Section 2.8 of this CRP, will be priority candidates for the application of this approach."	Consider the three points flagged in the comment section and incorporate any necessary changes into the next version of the CRP.	The Phase 1 WR CRP will be updated as appropriate to reflect the status of the current winter road construction program, the plan for the winter of 2023/24 and construction of the subsequent ASR.	See Board Decision to CIRNAC, comment 2 (re: updating the CRP to reflect the current Project status); GNWT-ENR, comment 5 (re: the statement about the winter road being used to support mine closure); GNWT-ENR, comment 7 (re: a timeline for deactivation); and GNWT-ENR, comment 6 (re: progressive reclamation details).

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		<p>1. The scope and DCP of Phase 1 has been a winter road to conduct geotech. The described WR was not to a design standard which would support the transport of material out of the mine site for mine closure.</p> <p>2. As mentioned in earlier comments, the CRP should not have vague open-ended timelines that could allow the company to drag out full reclamation over multiple years.</p> <p>3. Please clarify if the 2nd excerpt means that the 11km of NTWRS will undergo immediate progressive reclamation. And that it doesn't mean the 11km will not undergo immediate progressive reclamation because the winter road could be used for several more years.</p>			
23	Section 4 - Sediment and Erosion Control Plan p.42	p.42 mentions the "Sediment and Control Plan" but it should say "Sediment and Erosion Control Plan".	Fix plan name. And add acronym SECP in brackets as the undefined acronym is then used in section 5.1.3.	Corrections made for the next updated version of the CRP.	Board directive for CZN to update the CRP to fix the mistake on page 42 (Sediment and Control Plan), and to add the SECP as an acronym to the Plan.
24	Section 5 - winter road deactivation	<p>"Deactivation differs from reclamation in that it is considered as a short-term measure."</p> <p>Is there a described time frame associated with the term 'deactivation'? Is it one year, many years? This should be clarified.</p> <p>The next paragraph says "This deactivation plan outlines the procedures and schedule on the basis that ASR construction will be executed within the next two years. This CROP has been developed to address a situation in which CZN becomes insolvent and the mine site and WR alignment requires long term reclamation."</p> <p>The last sentence should likely not be in the 'winter road deactivation' section if this section is supposed to describe the short-term measure</p>	<p>Clarify what time period is associated with the term 'deactivation'.</p> <p>Remove the sentence that speaks about CZN becoming insolvent as that wouldn't align with the deactivation phase that's supposed to be short-term.</p>	<p>Deactivation is the period between year 1 of WR construction and year 2, which is now expected to occur.</p> <p>The references to insolvency and the last sentence of Section 5 will be moved to a more appropriate section of the CRP.</p>	<p>See Board Decision to MVLWB, comment 31.</p> <p>Board directive for CZN to update section 5 and remove the reference to insolvency to a more appropriate section of the CRP.</p>

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		that has a time frame of 2 years, and should be either removed or moved to somewhere else that discusses what happens after the 2 years.			
25	Section 5 - deactivation plan p.43	<p>"Prior to commencing construction, the contractor will provide CZN a deactivation plan tailored specifically to their equipment type and expectations, and at minimum in conformance with the conditions listed within."</p> <p>As construction of the WR has already begun, is the contractor deactivation plan available for posting to the Board's public registry?</p>	Share a copy of the contractor deactivation plan.	As per the Design and Construction Plan, a deactivation plan will be developed and provided. As the construction of the winter road is currently going on, the deactivation plan is being developed and updated. The deactivation plan will be available on the registry once it is completed.	The Deactivation Plans were submitted to the Board on March 29, 2023.
26	Section 5 - deactivation of NTWRS p.43	"Deactivation measures will therefore start in these areas as soon as conditions allow, taking an anticipated earlier spring freshet to the eastern part of the WR into account, and with measures that still allow on-going WR use by geotechnical investigation equipment and demobilizing construction equipment."	Please clarify what deactivation measures will occur while the same areas are still being used for geotech investigations.	Sections 5.1.2 and 5.1.3 describes the deactivation measures that will be implemented for both the Typical and Non-Typical WR sections as appropriate. The main objective is to ensure that the deactivated WR road prism will be generally stable and will not adversely affect the adjacent environment during the spring freshet and the period prior to ASR construction. Deactivation differs from reclamation in that it is considered as a short-term measure.	<p>CZN did not answer GNWT-Lands question about what deactivation measures will occur while the same areas are being used for geotechnical investigation.</p> <p>The Board directs CZN to reference the Deactivation Plans and clarify the activities conducted, schedule of deactivation, and post-deactivation monitoring timeline.</p>
27	Section 6.2 - Reclamation and Closure Strategies	"On the assumption that the WR does not progress to an ASR, the closure and reclamation of the WR will require consideration of six primary components:... The criteria presented provide a starting point for further discussion with the applicable parties and will be updated as appropriate in future revisions of the CRP for the WR."	If "reclamation and closure strategies" is to mean something more finite than the "deactivation" stage, CZN should describe the various hypotheticals and timelines that would apply. Having a list of criteria is a starting point; however, if the notion is that the WR does not progress to an ASR, the temporal aspect should be discussed in the CRP so it is not so open-ended. As mentioned in	The proposed closure objectives, closure criteria, primary reclamation measures and the method of measurement for each of the main components of the WR are outlined in Table 5 of the CRP (Oct. 2022 version).	See Board Decision to MVLWB, comment 31.

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			<p>previous comments, the different scenarios that could occur during the term of the LUP should be contemplated in the CRP so all parties can consider whether the CRP is appropriate. Having the WR for only one year but then having a e.g. a 6-yr or longer gap before it is fully remediated (i.e. if the project is abandoned) is not necessarily appropriate.</p>		
28	Section 6.3 - Primary Winter Road Reclamation Activities p.51	<p>Section 6.3 mentions "pulling back and recontouring of all NTWRS cut/fill slopes" and "application of the 'rough and loose' approach"; however, 'rough and loose' was mention is section 4 as part of the progressive reclamation activities. Is this approach occurring during multiple phases of the CRP?</p>	<p>Clarify whether the 'rough and loose' method is being used across the different phases of closure.</p>	<p>It is CZN's intention to apply the successfully demonstrated rough and loose approach for Non-Typical WR sections, including side-slope and pull back areas, WR camp sites and other physically disturbed areas.</p>	<p>CZN did not answer the question about whether the 'rough and loose' method is being used across different phases of closure. The Board requires this information in the next version of the CRP.</p>
29	Section 6.4 - reference to section 2.1 p.51	<p>"As previously noted in Section 2.1, during initial WR ROW clearing, tree stumps, roots, shrubs and ground cover will be left in place..."</p> <p>Section 2.1 of the CRP is site history. Unsure what section should be referenced in the above sentence.</p> <p>Next paragraph mentions "Section 1.5 of this CRP". Unsure if this is the correct section number too?</p>	<p>Fix sentences so they reference the appropriate section number and/or plan.</p> <p>Should do a global check that all mentioned section numbers in the CRP are referencing the correct section.</p>	<p>All references to appropriate section numbers and/or other CZN management plans will be checked and corrected as necessary.</p>	<p>See Board Decision to CIRNAC, comment 4.</p>
30	Section 6.4 - reclamation 1-5 yrs p.51	<p>"As a result, the predicted environmental effects associated with the closure and reclamation of the WR are generally expected to be of a relatively short-term (1-5 years) and reversible nature, as described further in the following sections."</p> <p>If the predicted environmental effects are to indeed be short-term in nature, CZN shouldn't suggest elsewhere in the CRP that it could be a multi-year winter road if the ASR isn't built and the WR needs to be used for reclamation of the</p>	<p>Section 6.4 and the rest of the CRP should ensure that timelines align.</p>	<p>Agreed, timelines consistency will be checked and corrected as necessary in the updated CRP.</p>	<p>See Board Decision to CIRNAC, comment 2.</p> <p>See Board Decision to MVLWB, comment 31.</p>

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		mine site. As ASR abandonment is a hypothetical, section 6.4 should perhaps have a caveat that the impact could be for longer if there are unexpected changes to the project.			
31	Section 6.4.2 - start of road p.54	<p>"For the existing historical road section extending from KP 0 to KP 10, a medium sized excavator (25 ton) will be used to remove existing culverts to re-establish the original streams and assist with the distribution of woody debris to encourage natural revegetation."</p> <p>According to CZNs maps, KP 0 is within the mine site lease boundary and then the active quarry is near KP 2.5. So will this specific reclamation (KP0 to KP10) only occur after the mine site is reclaimed as that portion of the road will need to be continued to be used as the mine is reclaimed?</p>	If a portion of KP 0 to KP 10 cannot be reclaimed because those sections are integral to the mine site, CZN should clarify which sections of the first 10 km would undergo the noted reclamation in section 6.4.2.	Reclamation of KP0 to KP10 in the vicinity of the mine will only occur after the mine site is reclaimed as that portion of the road will need to be continued to be used as the mine is reclaimed.	The Board directs CZN to update the CRP to clarify that reclamation of KP0 to KP10 in the vicinity of the mine will only occur after the mine site is reclaimed as that portion of the road will need to be continued to be used as the mine is reclaimed.
32	Section 6.4.6 Contaminant remediation p.56	<p>This section implies that in situ bio-remediation could be used for residual hydrocarbon contamination.</p> <p>Further detail about this proposed activity should be included so reviewers can consider whether the approach is appropriate for this project. For example, how many years is in situ bioremediation expected to take? Will this only occur in certain locations that have favourable conditions? Will regular monitoring occur? Will there be any limits to this approach (e.g. max area it could be applied to)?</p>	Please provide more detail about how and when in situ bioremediation could be applied.	In-situ bio-remediation of hydrocarbon contaminated sites would typically only be applied in more remote areas where residual hydrocarbons (typically diesel) from a winter spill have seeped into the surface soils. In situ bio-remediation (using "bugs in a bag" and nutrients) is preferable to excavation and removal of the hydrocarbon contaminated soils. Follow-up treatments and monitoring of remediation effectiveness and surface runoff water quality would occur annually until effective bio-remediation has been achieved.	See response to GNWT-ENR, comment 14.
33	Section 6.5 Reclamation Trials	"Tentatively, a number of representative sections of TWRS and NTWRS and particularly sensitive stream crossings would be selected for reclamation trials in consultation with the MVLWB, PC and Indigenous groups."	Ensure that the GNWT is included in the reclamation trials and monitoring discussions.	GNWT Lands will be included in the reclamation trials and monitoring discussions.	Board directive that requires CZN to update Section 6.5 to include GNWT Lands in the reclamation trials and monitoring discussions.



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		Because the CRP applies to CZN's LOO that was issued by the GNWT Department of Lands, GNWT should be included in the discussions. Same thing applies to the monitoring mentioned in section 6.6.			
34	Section 6.6 Monitoring	If in situ bio-remediation is being employed for residual hydrocarbon contamination, these sites should also be part of the monitoring list in section 6.6.	Add in-situ bio-remediation monitoring to the list in section 6.6.	In-situ bio-remediation monitoring will be added to the list in Section 6.6.	Board directive to CZN according to the commitment.
<b>Fisheries and Oceans Canada (DFO) - Dana Harris</b>					
1	Document as a whole	DFO has reviewed the document in accordance with our mandate and has no comments at this time.	DFO has no recommendations at this time.	Thank you DFO. No action required by CZN.	Noted.
<b>MVLWB - Andy Wheeler</b>					
1	General comment - document structure	Schedule 4 of Licence MV2019L8-0002 and Schedule 5 of Licence MV2014L8-0006 list the submission requirements of the Plan, while also outlining the requirements in a logical way. At times the structure of the Plan differs from the order of the schedules, while section titles and text throughout the Plan do not align with the terminology in the Licences (for example, deactivation vs temporary closure). The current structure and terminology pose challenges to the reader in understanding where content is located and whether the requirements have been addressed.	Consider adjusting the structure of the document to align with Schedules 4 and 5 of the Licences.	With respect, the information contained in the Phase 1 WR CRP is generally consistent with and presented in an order that is generally in conformance with Schedule 4 of Licence MV2019L8-0002 and Schedule 5 of Licence MV2014L8-0006. The current version of the CRP has been subjected to considerable previous review by various parties, resulting in the production of 6 new versions to date, including changes to section(s) referencing as appropriate, thus CZN would respectfully request that the current structure of the Phase 1 WR CRP be retained as is.	Noted. Given the several recommended Board directives based on the public review, the Board believes that the terminology in the next version of the CRP will be more clear.
2	Same as above	Same as above	Ensure the section headings align with the terminology in Schedules 4 and 5 of the Licences.	See response to MVLWB-1.	Noted.
3	Same as above	Same as above	Ensure the text throughout the document aligns with the terminology of the Licences.	See response to MVLWB-1.	Noted.

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4	General comment - conformity tables	Multiple conformity tables are provided at the beginning of the document. Due to there length it would improve the readability of the document if the conformity tables were relocated to an appendix.	Relocate conformity tables to an appendix.	As recommended, the conformity tables will be added to the CRP as an appendix. Note that the guidance document for management plans has the conformance tables at the beginning of the document. CZN has placed the tables here to be consistent with other management plans.	The Board directs CZN to update the CRP to include conformity tables as an appendix to the CRP for readability.
5	General comment - referencing appendices	In section 2.7 (page 14), CZN references Appendices I and J. In section 5.1.3 CZN references Appendix N. Board staff note that these appendices are not in the Plan	Review the Plan and ensure appendices that are referenced are included.	All appendices will be properly referenced and included in the Appendices Section of the CRP.	The Board directs CZN to update the CRP to properly reference and include appendices.
6	General comment - phase 1 deactivation, temporary closure, and closure timing	In the event CZN does not proceed to phase 2, it is not clear when CZN intends to implement closure and reclamation activities after phase 1 has been deactivated. Further, the sequencing of deactivation, temporary closure, and closure timing are not described in the event CZN does not proceed to phase 2.	Outline how CZN envisages the sequencing of phase 1 construction, deactivation, temporary closure, and closure, assuming CZN does not proceed to phase 2. As part of the response, include the proposed timing of each stage.	CZN intends to advance to Phase 2 ASR construction in 2023 and is currently working on the Phase 2 management plans for this activity. Deactivation is a requirement of the Phase 1 winter road and is outlined in the Phase 1 Design and Construction Plan. Currently there is no plan for temporary closure. The timeline for transitioning from Phase 1 to Phase 2 has been left flexible and will be evaluated continually by the business. If CZN does not progress to Phase 2 after that period of time, the schedule will be revisited.	See Board Decision to MVLWB, comment 31.
7	General comment - project schedule	The Board has received information about the ongoing construction of phase 1 through Inspection Reports and other notifications submitted by CZN (or contractors).	CZN to give an update on the current project schedule and any content of the Plan that will need to be revised accordingly.	It is understood that the Phase 1 WR CRP will be further updated based on the evolving project schedule.	See Board Decision to CIRNAC, comment 2.
8	General comment - non-typical winter road	Sections 2.8.2 and 6.4.2 indicate non-typical sections will total 11 kms, while section 5 states 11.6 kms, and the Design and Construction Plan (DCP) indicates 14.8 kms (page 9). There should	Correct the discrepancies. If the information presented in the DCP is accurate, CZN can simply refer to that document.	The total number of kms of non-typical sections of the WR, as currently stated in the CRP, will be adjusted to reflect what is	Board directive for CZN to update sections 2.8.2 and 6.4.2 of the CRP with the total number of kilometers of non-typical WR sections, as is in the

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	specifications	not be discrepancies between documentation as to the specifications of the road.		presented in the DCP.	DCP.
9	See above	LWB staff understand that phase 1 construction is underway. It would be helpful to have an update as to the total length of non-typical sections.	Provide an update on the total length of non-typical winter road sections now that construction is underway.	CZN is currently constructing the winter road. Once the winter road is complete and as-builts and reporting has been completed, the total length of the non-typical winter road sections will be available. Until that time, the total length will not be finalized.	Board directive for CZN to include an update on the total length of non-typical winter road sections in the next version of the CRP. This should include a discussion of how the actual total length of non-typical sections differed from that presented in the DCP (see recommended Board Directive for MVLWB, comment 8).
10	General comment - MV2014L8-0006 Part E, condition 17, MV2019L8-0002, Part D, condition 17	Part D and E, condition 17 of the licences require the submission of as-built reports for engineered structures within 90 days of completion.	Provide an update on the anticipated submission timing of as-built reports.	The Phase 1 winter road is currently under construction. As per the referenced conditions, as-builts will be provided within 90 day of the winter road construction.	Noted.
11	Section 1.1	This section states that engagement with potentially affected parties will occur prior to CRP implementation. Please note that, as per the MVLWB/AANDC Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (Closure Guidelines), engagement should be conducted throughout closure planning, rather than simply prior to implementation of the Plan.	Clarify the parties they will engage with throughout closure planning, how they will engage parties, and summarize closure-related engagement triggers.	CZN continues to engage with parties on all activities based on feedback. The Engagement Plan outlines the parties and approaches to engagement which is not just for the CRP but for all aspects of the Phase 1 Winter Road.	As indicated in the comment, as per the Closure Guidelines engagement should be conducted throughout closure planning. The Board received several comments about the content of the Phase 1 CRP, including the information in Table 5 (e.g., objectives, criteria, monitoring, etc.). It is pertinent for CZN to engage with Parties to discuss the outstanding issues prior to re-submitting the Plan to ensure an efficient public review of the next version for the CRP.  The Board directs CZN to update the CRP with the engagement details recommended by Board staff.
12	Section 1.9	This section summarizes engagement that has been conducted with respect to closure planning,	Describe how feedback from affected parties has been	Feedback through engagement was incorporated into the original	See Board Decision to MVLWB, comment 14.

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		though, it is not clear to what extent the information obtained from affected parties has been incorporated. Clarification is required.	incorporated into closure planning.	version of the Closure Plan throughout the document.	
13	Same as above	Same as above.	Provide a log of closure-related engagement in accordance with the Land and Water Boards' Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits as part of a revised plan.	As the scope and submission of the updated CRP has not changed, there have been no additional requirements from the original versions that were submitted. The updated version was provided based on the regulators directives.	An Engagement Record (including an Engagement Summary and Engagement Log) in the next version of the CRP will greatly assist the Board determine whether closure related engagement with parties has occurred, and this is an expectation of the Closure Guidelines as well as the LWB's Consultation and Engagement Policy.  For this reason, the Board directs CZN to include an Engagement Record (including an Engagement Summary and Log) detailing closure-related engagement for the Phase 1 CRP in the next version of the plan.
14	Same as above	Same as above.	Did CZN engage parties as part of developing the objectives, criteria, activities, and monitoring proposed in section 6.2 table 5? Provide detail on engagement methods, topics, timing, and outcomes.	Section 1.9 of the CRP (Engagement Related to Closure and Reclamation Planning) will be updated with the results of any more recent engagement efforts going forward.	See Board Decision, MVLWB comment 11. Board directive for CZN to update Section 1.9 with the results of engagement efforts on the next version of the Phase 1 CRP.
15	Section 2.8.2 and section 2.9	Section 2.8.2 indicates that "No borrow pits will be required for any of the WR construction program". This appears to contradict the statement in section 2.9 that states "To assist in PWR construction activities, additional rip-rap will be developed from the onsite quarry at the Mine site."	Update the text to clarify the inconsistency.	The text in section 2.8.2 of the CRP has been updated.	Board Decision to GNWT-Lands, comment 13. Update the text in section 2.8.2 for consistency.
16	Section 2.9 and section 3.6 - mine site borrow pit geochemistry	This section indicates that an existing borrow pit near the airstrip at the Prairie Creek Mine will be utilized as part of phase 1 construction. Section 3.6 describes geochemical conditions of material associated with construction, with reference to	Provide evidence pertaining to the geochemical conditions of the material sourced from the existing borrow pit near the airstrip at the mine site.	CZN has a quarry permit for the quarry located at Prairie Creek issues by the GNWT. The application for the quarry permit included geochemical	Part E, Condition 5 of MV2014L8-0006 and Part D, Condition 5 of MV2019L8-0002 states that "The Licensee shall maintain Construction records and geochemical records of Construction

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		<p>the approved Geochemical Verification Program. Upon review of the information in this Plan and that in the Geochemical Verification Program, the geochemistry of the borrow pit near the airstrip has not been provided.</p> <p>Note that Schedules 4 of MV2019L8-0002 and Schedule 5 of MV2014L8-0006 (Condition 1(g)(iii)) require the description of the pre-existing chemical conditions.</p>		<p>information. Note that the Phase 1 LUP was amended in 2022 to allow for the use of the quarry material for the construction on the territorial land during Phase 1 and is required to be clean and non-PAG.</p>	<p>materials for all structures and make them available at the request of the Board or an Inspector". The Board hereby directs CZN to provide the geochemical records of the construction material since CZN has indicated the record is available.</p>
17	Section 4	<p>This section states "... should CZN not proceed with the Project beyond this point, the winter road may be used for several more years to support closure and reclamation of the Mine site prior to final reclamation, and there will be opportunities to implement progressive reclamation along certain portions of the WR."</p> <p>Board staff note that the neither the definition of 'Phase 1' in the authorizations nor the scope of the phase 1 management plans account for use of the phase 1 road to support closure and reclamation of the mine site. This information should be removed.</p>	<p>Remove information related to using the phase 1 winter road to support closure and reclamation of the mine site from the Plan and contact Land and Water Board Staff well in advance of this use to determine necessary regulatory processes.</p>	<p>This information can be removed from the Phase 1 WR CRP, but CZN believes that it is important for parties to understand that if plans change and the ASR is not constructed, it is likely that what will then be an existing winter road will likely be used for subsequent Mine closure activities. CZN understands that further engagement and regulatory review would be required to use the WR for such activities.</p>	<p>See Board Decision to GNWT-ENR, comment 5.</p>
18	Section 6.1	<p>This section states that "The closure and reclamation of this Project will be conducted in accordance with the terms and conditions of the anticipated MVLWB and PC LUP and WL". It appears that this statement was not updated following the MVLWB and Parks Canada decisions regarding the Permits and Licences in 2019.</p>	<p>Update the statement to reflect that the Permit and Licences have been issued.</p>	<p>This statement will be updated to reflect that the Permit(s) and Licence(s) have been issued.</p>	<p>The Board directs CZN to update section 6.1 to reflect that the permits and licences have been issued.</p>
19	Section 6.1, 6.2, Table 5, closure objectives	<p>Section 6.1 indicates that the reclamation goals listed "will be supported by the four closure principles of physical stability, chemical stability, no long-term active care requirements, and future uses (including aesthetics and values...)." These closure principles appear to align with the four core closure principles described in the Closure Guidelines, though, Table 5 includes variations of these principles as closure objectives</p>	<p>Clearly distinguish between closure objectives and principles.</p>	<p>This will be clarified in the next version of the Phase 1 WR CRP.</p>	<p>Board Decision to GNWT-ENR, comment 9.</p>

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		(Objective 1 - 4).			
20	Section 6.2, Table 5	The title of the table does not include 'Activities' despite comprising part of the content. Further, the title includes 'Measurement Methods', and its not clear what this is referring to.	Update the title to reflect the content of the table: Phase 1 Closure Objectives, Criteria, Activities, and Post-Closure Monitoring.	The title of Table 5 will be updated to include Activities as per the contents of the table.	Board directive for CZN to update the title of Table 5 to reflect the contents of the table.
21	Section 6.2, Table 5, closure objective identification	The table includes a column titled 'Closure Objective' as well as rows which identify closure objectives 1 to 4. The rows for closure objectives 1 and 2 also have two separate objectives underneath them.	Separate each closure objective into its own row and identify each with a number.	The format of Table 5 will be corrected as recommended.	See Board Decision to GNWT-ENR, comment 9 and MVLWB, comment 19.
22	Section 6.2, Table 5, objective 2 first row closure criteria	This closure criterion states "Meet Water Quality Criteria in WR surface waters as described in MVLWB Water Licence MV2019L8-0002 and PC Water Licence PC2014L8-0006 revised 20 Nov. 2019 for a period of 2 years from the initiation of the WR Post-Closure period." From this information it is not clear what CZN is referring to. Board staff suggest removing "revised 20 Nov. 2019" as it is assumed any reference to a Board/Parks Canada authorization would be to the most recently approved version.	Clarify this proposed criterion.	Reference to "revised 20 Nov. 2019" will be removed from the next updated version of the Phase 1 CRP.	The Board directs CZN to update the CRP to remove "revised 20 Nov. 2019" from Table 5, objective 2.
23	Section 6.2, Table 5, primary reclamation activities and sections 6.3 and 6.4	Section 6.2, Table 5 summarizes reclamation activities to be undertaken to achieve closure objectives and criteria, while sections 6.3 and 6.4 also describe activities and identify them by project component, though, the linkage between the information in these sections is not clear. Clarification is required.	Clarify whether the intent of sections 6.3 and 6.4 is to expand upon to information provided in section 6.2, Table 5, Primary Reclamation Activities. If this is not the intent, describe how the information relates.	This issue will be clarified in the next version of the Phase 1 WR CRP.	The Board directs CZN to clarify the issue in the next version of the CRP.
24	Section 6.2, Table 5, post-closure inspections and/or monitoring and section 6.6	Section 6.2, Table 5 summarizes post-closure monitoring that will be undertaken, while section 6.6 also describes monitoring for each component; though, the linkage between the information in these sections is not clear.	Clarify whether the intent of section 6.6 is to expand upon the information provided in section 6.2, Table 5, Post-Closure Inspections and/or Monitoring. If this is not the intent, describe how the information relates.	This issue will be clarified in the next version of the Phase 1 WR CRP.	The Board directs CZN to clarify the issue in the next version of the CRP.
25	Section 6.4.6 in situ	This section indicates that "in situ bio-remediation approaches can be employed	CZN to further describe the proposed method of applying in	In-situ bio-remediation of hydrocarbon contaminated sites	See Board Decision to GNWT-ENR, 14.

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	remediation of residual hydrocarbon contamination	successfully to spills that have occurred in previously undisturbed, natural environments, including permafrost terrain." It is unclear if CZN is proposing to implement this approach and, if so, what methods would be applied.	situ bio-remediation to substrate with hydrocarbon contamination, including: the types of hydrocarbon releases/contamination this method would apply to; the analysis that was done to determine this proposed activity over different waste management approaches; and the specific "approaches" that would be implemented, as referenced in the statement.	would typically only be applied in more remote areas where residual hydrocarbons (typically diesel) from a winter spill have seeped into the surface soils. In situ bio-remediation (using 'bugs in a bag' and nutrients) is preferable to excavation and removal of the hydrocarbon contaminated soils. Follow-up treatments and monitoring of remediation effectiveness and surface runoff water quality would occur annually until effective bio-remediation has been achieved.	
26	Section 6.4.6 in situ remediation of residual hydrocarbon contamination	See above. The proposed bio-remediation approach for addressing residual hydrocarbon seems to be a closure activity related to the chemical stability principle. It is unclear why this activity would not be included in Table 5.	Does CZN intend to tie the proposed closure activity to a closure objective and associated criteria?	Bio-remediation using in situ remediation will be incorporated into Table 5.	Board directive to update Table 5 to include in-situ bioremediation.
27	Section 6.7 adaptive management	Guidance on establishing action levels is provided in the MVLWB/GNWT (2019) Guidelines for Aquatic Effects Monitoring Programs. This includes establishing low, moderate, and high action levels. Within this Plan, only low action levels are proposed, with rationale citing the WLWB (2010) Response Framework stating that low action levels are all that is required at this stage in closure planning. CZN should be following current guidance for current expectations in terms of approach. Specifically, this includes proposing moderate and high action levels noting that these can be refined as part of a response action if the low action level is triggered.	Update the Plan with proposed moderate and high action levels.	Section 6.7 of the Phase 1 WR CRP will be updated to address the proposed moderate and high action levels.	See Board Decision to GNWT-ENR, comment 16.
28	Section 6.7 adaptive management	Further to the comment above, CZN has included action levels of all three tiers for vegetation, though, action levels related to other criteria have not been included, nor is there an indication as to why such action levels have not been	Propose action levels for other closure criteria as applicable and/or provide rationale as to why action levels are not necessary for each proposed criteria.	Propose action levels for other closure criteria outlined in Table 5 will be incorporated as appropriate in section 6.7 or reference will be made to where	Board Directive requiring CZN to update Section 6.7 to propose action levels for closure criteria outlined in Table 5 as appropriate.

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		proposed		they can be found in other CZN management plans.	
29	Schedule 4 (MV2019L8-0002) and schedule 5 (MV2014L8-0006), condition 1(J)(iii) design drawings	The conformity table indicates design drawings are provided in sections 2.4 and 2.7. After reviewing those sections it is apparent design drawings have not been provided. Further, this section states "Design drawings, signed and stamped by a Professional Engineer, will be produced if required for any engineered structures." Please note that Condition 1(J)(iii) of the schedules require design drawings for engineered structures.	Update the document with design drawings or a link to where the information can be obtained.	Design drawings are included with the Phase 1 Design and Construction Plan.	Board Directive for CZN to include a link to the DCP to fulfill the schedule item.
30	Schedule 4 (MV2019L8-0002) and Schedule 5 (MV2014L8-0006), condition 1(J)(viii) uncertainties and contingencies	The conformity table page xii indicates information pertaining to uncertainties and contingencies is provided in sections 2.7 and 2.9; however, after reviewing those sections it is not clear what uncertainties and contingencies are applicable.	Discuss uncertainties and contingencies pertaining to closure planning.	Uncertainties and contingencies pertaining to closure planning will be further discussed in sections of the CRP as appropriate.	See Board Decision to GNWT-ENR, comment 3.
31	Schedule 4 (MV2019L8-0002) and schedule 5 (MV2014L8-0006), condition 1(l) temporary closure	The schedules require information pertaining to temporary closure. Throughout section 5 of the Plan procedures for deactivation are described. Deactivation is also referred to as "temporary suspension." It is not clear how deactivation and temporary suspension relate to temporary closure. Clarification regarding the intent of deactivation and inconsistency of terminology is required.	Clarify how deactivation relates to temporary closure and define necessary terms.	The deactivation term has been clarified to be synonymous with temporary closure.	This response is not consistent with the response to MVLWB, comment 6 where CZN indicated that "Currently there is no plan for temporary closure".  The Board acknowledges that CZN is of the opinion that "the term deactivation is synonymous with temporary closure". However, distinguishing between deactivation and temporary closure in the CRP would address some of the concerns raised by parties. Therefore, the Board directs CZN to define



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					temporary closure in a revised CRP to be the period after completion of post-deactivation monitoring and commencement of Phase 2 (if no decision is made to commence Phase 2). The Board also directs CZN to describe temporary closure in accordance with Section 7 (Temporary Closure) in the Board’s Closure and Reclamation Plan Template in the Closure Guidelines. The Board’s Closure Guidelines may help guide CZN to provide information regarding temporary closure goals and objectives, activities, monitoring, maintenance, reporting, contingency, and schedule. As per the Board’s Closure Guidelines, CZN should “propose the duration for what constitutes temporary closure at their particular operation”.
32	See above	Deactivation is also described in the Design and Construction Plan (DCP). To eliminate the chance of contradictory information, CZN could simply refer to the information presented in the DCP.	Refer to the DCP for applicable information pertaining to deactivation	The Phase 1 WR CRP will be updated to reflect the latest version of the DCP as appropriate.	Board directive requiring CZN to update the CRP to reflect the latest version of the DCP.
33	Schedule 4 (MV2019L8-0002) and schedule 5 (MV2014L8-0006), condition 1(n) closure cost estimates	This condition requires that closure cost estimates be included with the Plan, however, this information has not been provided.	CZN to provide closure cost estimates or provide rationale as to why a review of closure costs is not required at this point in time.	There has been no change to the assumptions that were used for the securities required for the closure cost estimate that is on the registry <a href="https://registry.mvlwb.ca/Documents/MV2014L8-0006/MV2014F0013%20MV2014L8-0006%20MV2019L8-0002%20-%20Canadian%20Zinc%20-%20Final%20Security%20Estimate">https://registry.mvlwb.ca/Documents/MV2014L8-0006/MV2014F0013%20MV2014L8-0006%20MV2019L8-0002%20-%20Canadian%20Zinc%20-%20Final%20Security%20Estimate</a>	See Board Decision to GNWT-ENR, comment 4.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
				s%20-%20Oct%203_19.pdf The scope of work has not changed and therefore the cost estimate has not changed for the Phase 1 Winter Road.	
<b>Acho Dene Koe First Nation (ADKFN) - Scott Mackay</b>					
1	Plain Language Summary	The Proponent notes that the WR will be constructed to only support geotechnical investigation equipment and vehicles. The geotechnical investigation will inform the design of the ASR which will commence the following year.  Therefore, the closure and reclamation of the WR is not anticipated to be required but has been developed if the ASR is not completed. Our understanding of the project is that the ASR may not align with the path of the WR through the entirety of the roadway.	The Proponent should confirm that any instances where the ASR does not align with the WR, it is the intention of the Proponent to close and reclaim the WR.	Once the final design of the ASR has been approved, the Phase 2 CRP will be able to identify areas where the Phase 1 Winter Road is not aligned with the ASR. The Phase 2 CRP will contain information related to the instances where the ASR does not align with the WR.	Adequate response. The Board reminds CZN that this information should be included in the Phase 2 CRP.
2	Section 1.2 Purpose and Scope	The Proponent notes that engagement with potentially affected Indigenous Groups including Nahæâ Dehé Dene Band (NDDDB) and Liidlii Kué First Nation (LKFN) will occur prior to the implementation of the CRP. Portions of the ASR roadway will overlap Acho Dene Koe First Nation Traditional Territory.	Acho Dene Koe First Nation requests that the Proponent engage with our Nation on aspects of the CRP which may impact our Traditional Territory, which includes but is not limited to sections of the WR that are directly within our Territory.	CZN will engage with ADKFN on aspects of the CRP that impact ADKFN's traditional territory.	See Board Decision to GNWT-Lands, comment 6.
3	Section 1.4 CZN Environmental Policy	The Proponent states that it “recognize(s) local communities as stakeholders”. Acho Dene Koe First Nation reminds the Proponent that we are a rights holding Nation with specific rights protected by Treaty 11 and section 35 of the Canadian Constitution Act. While duties outlined in these documents are the ultimate responsibility of the Crown, the Proponent must be aware of all duties and obligations which are delegated to it, because of any authorizations, activities or proposed activities which may adversely impact the rights and interests of Acho	Acho Dene Koe First Nation requests that the Proponent revise all language which implies affected Indigenous nations to be stakeholders, rather than rights holders.	CZN will review where updates to stakeholders should be made in the document.	The Board directs CZN to review the document and update the terminology from ‘stakeholders’ to ‘rights holders’ where appropriate.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
		Dene Koe First Nation.			
4	Section 1.5 Incorporation of Dene Knowledge	Closure and reclamation of the WR where appropriate, must include the incorporation of knowledge from Acho Dene Koe First Nation.	Acho Dene Koe First Nation has been working with the Proponent to complete a Traditional Knowledge and Land Use Occupancy study for the section of the WR/ASR that overlaps with Acho Dene Koe First Nation Traditional Territory. While this document is currently in final stages of completion, we request that the Proponent acknowledge and commit to the incorporation of Acho Dene Koe First Nation Dene Knowledge in the CRP where appropriate and continue to engage with Acho Dene Koe First Nation on matters where incorporation of our Knowledge is beneficial to project outcomes and relevant to the WR CRP.	CZN looks forward to working with ADKFN on the finalization of the TK study and will continue to engage with ADKFN.	ADKFN's request for CZN to acknowledge ADKFN Knowledge is reasonable. The Board directs CZN to update the CRP to acknowledge the incorporation of ADKFN Knowledge where appropriate.
5	Section 1.6.2 Closure Principles	The Proponent highlight four core closure principles which guide the ultimate closure goal for the WR. These principles are based on the MVLWB 20213 Guidelines for the Closure and Reclamation of advance Mineral Exploration and Mine Sites in the Northwest Territories. We agree with these principles, and the Parks Canada Principles and Guidelines outlined in section 1.6.3, however, we note that there are important differences between the closure and reclamation of a mine site and that of a liner disturbance such as the WR.	Where applicable, we recommend that additional care be taken to ensure that upon closure and reclamation, the goal of minimizing habitat fragmentation also be considered as paramount. Linear disturbances such as roadway corridors can restrict wildlife migration. Therefore, it is expected that reclamation include activities such as recontouring and revegetation to minimize longer term effects from the corridor.	The closure activities included in the Phase 1 WR are related to the construction and use of a winter road for the drilling investigation and therefore there is a smaller amount of impacts and loss. Sections that required a non-typical construction will be evaluated during the deactivation of the Winter Road. Section 6.4 outlines how revegetation would be handled as part of the closure of the Phase 1 WR if required.	In response to GNWT-ENR, comment 19 CZN committed to developing a closure principle that considers the restoration of caribou habitat to pre-disturbance conditions. Presumably the closure objective(s) and criteria(s) associated with this principle could consider the success of revegetation efforts and the minimizing of habitat fragmentation. This comment highlights the importance of CZN engaging with Parties on the next version of the Phase 1 CRP.
6	Section 1.9 Engagement Related to Closure and Reclamation Planning	Sections of the total ASR/WR, extend into ADKFN Traditional Territory. Given the physical but also regulatory connectedness between the road segments Acho Dene Koe First Nation requests that the Proponent continue to engage with our Nation regarding plans and opportunities related	It is our expectation that engagement from the Proponent will be continued and ongoing through the life of the project. This includes providing updates directly to our Nation on plans and	CZN will continue to engage with ADKFN on aspects of the CRP that impact ADKFN's traditional territory through the life of the project.	See Board Decision to GNWT-Lands, comment 6.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
		to the CRP of the WR.	intentions for the closure and reclamation of the WR. Further, we expect that the Proponent will engage our Nation in and any aspect of the WR that has the potential to impact the rights and interests of our members.		
7	Section 5.0 Winter Road Deactivation	The Proponent make reference to a CROP. It is assumed that this is a typo for CRP, however, if not CROP needs to be defined.	Please revise text or define CROP as an acronym.	This typo has been corrected it should be CRP.	See Board Decision to CIRNAC, comment 3.
8	Section 6.4.5 Camps and Other Winter Road Infrastructure	The Proponent notes that they only intend on deactivating camp sites associated with the WR, as the will be used in the construction of the ASR. In the event that the construction of the ASR is delayed, or cannot be built, it is unclear what the fate of these sites will be.	Please include further description on closure and reclamation plans for camp sites and other relevant infrastructure which is intended to be deactivated for reuse in the construction of the ASR. Specifically, please provide additional information on closure and reclamation activities to be conducted if the ASR is not constructed.	Closure and reclamation of camps if not to be used for ASR construction or not constructed at all are discussed in Section 6.4.5 of the Phase 1 CRP.	See Board Decision to GNWT-Lands, comment 16.
9	Section 6.5 Reclamation Trials	It is unclear from the description whether reclamation trials would be used to inform reclamation activities throughout the entirety of the WR or simply specific localities. Additionally, more information is necessary on the expected trial length, as if this information is to be used in informing WR reclamation efforts, these trials may delay the implementation of full reclamation activities.	As activities associated with reclamation trials are hypothetical at this point. Please ensure information is shared with ADKFN as additional information is made available.	As per Section 6.5, the development of the reclamation trials will be implemented after the WR and only if the Project is not proceeding to Phase 2. In this case, the locations and plan for these trials will be engaged on for further development. At this time, there is no additional information to provide. Once more details on the reclamation trials have been developed CZN can provide these.	See Board Decision to GNWT-ENR, comment 15.
10	Section 6.6 Monitoring	The Proponent suggests that post-closure monitoring will only take place in the event the road is closed, and the ASR is not to be constructed. While this is a reasonable approach, it is likely that the decision not to proceed with the ASR will occur immediately	Please provide an outline of monitoring activities to occur during periods of deactivation if no decision is made to continue with Phase 2 of the ASR.	Monitoring post-WR construction will be determined based on the requirements in the DCP and approved management plans. Details on monitoring during deactivation can be found in the	See Board Decision to MVLWB, comment 31.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
		<p>following the completion of Phase 1 activities. Rather, the decision to no proceed with ASR construction may not occur for several years, with the WR maintaining a state of deactivation. It is important in this scenario that monitoring of the deactivated roadway continue until a decision regarding Phase 2 is made to ensure the roadway poses no threat to the stability of the surrounding environment. Further, ongoing monitoring of the deactivated WR would ensure that the roadway does not degrade in a manner which would impact the ability of the Proponent to properly close and reclaim the WR in the future.</p>		DCP.	
11	Section 6.7 Adaptive Management	<p>The Proponent states “only the Low Action Levels need to be set in advance of actually measuring an environmental change” as exceedance of these levels will trigger further action and the establishment of higher trigger levels. While this approach preserves a level of precaution in the adaptive management approach, without setting higher trigger levels this approach lacks an understanding of magnitude of impact. Without medium and/or high trigger levels also being established, the need to establish these following an exceedance of a low trigger will only serve to slow down response.</p>	<p>It is recommended that the Proponent develop at least one additional set of higher action triggers to support and understanding of magnitude of impact and guide appropriate response.</p>	<p>Low, Moderate and High Action Level triggers are provided in Section 6.7 of the Phase 1 CRP.</p>	<p>See Board Decision to GNWT-ENR, comment 16.</p>



February 09, 2023

Jacqueline Ho  
Technical Advisor  
Mackenzie Valley Land and Water Board  
P.O. BOX 2130  
YELLOWKNIFE, NT X1A 2P6

Dear Jacqueline Ho,

**Environment and Natural Resources' recommendations on CZN All-Season Road Closure and Reclamation Plan Version 1 (MV2014F0013, MV2014L8-0006, MV2019L8-0002)**

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The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the application at reference based on its mandated responsibilities under the *Waters Act* and the *Wildlife Act*. ENR has provided comments and recommendations on the Online Review System for the consideration of the Mackenzie Valley Land and Water Board at this time.

Please contact Kathy Unger, Range Planning Biologist with the Wildlife Division at [Kathy Unger@gov.nt.ca](mailto:Kathy.Unger@gov.nt.ca) if you have any technical questions about ENR's recommendations regarding Wildlife. For all other technical questions about ENR's recommendations, please contact Celena Hoeve, Water Management Advisor with the Water Management and Monitoring Division at [Celena Hoeve@gov.nt.ca](mailto:Celena.Hoeve@gov.nt.ca)

Please contact [gnwt\\_ea@gov.nt.ca](mailto:gnwt_ea@gov.nt.ca) with any general questions or concerns.

Sincerely,

Shakita Jensen  
Environmental Assessment and Monitoring Unit  
Environment and Natural Resources

Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
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ECCC File: 5100 000 014/010, /011 & /016  
MVLWB File: MV2014F0013, MV2014L8-0006 & MV2019L8-0002



February 9, 2023

via online review system

Andy Wheeler  
Regulatory Specialist  
Mackenzie Valley Land and Water Board  
7th Floor, 4922 48th Street  
P.O. Box 2130  
Yellowknife, NT X1A 2P6

Dear Andy Wheeler:

**RE: MV2014F0013, MV2014L8-0006 & MV2019L8-0002 – Canadian Zinc Corporation –  
Prairie Creek All-Season Road – Winter Road Closure and Reclamation Plan Version 1.0**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Mackenzie Valley Land and Water Board (MVLWB) regarding the above mentioned plan.

In December 2022, ECCC reviewed the same version of this document under the Parks Canada licence/permit process and provided comments, which the Proponent responded to on December 20, 2022. The comments and recommendations originally provided on December 6, 2022, under that process are reiterated here. The Proponent's response to each comment is included. ECCC is also providing additional comments, which address the Proponent's responses.

ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

If you need more information, please contact Melissa Pinto at (867) 445-5384 or [Melissa.Pinto@ec.gc.ca](mailto:Melissa.Pinto@ec.gc.ca).

Sincerely,



*[original signed by]*

Melissa Pinto  
Senior Environmental Assessment Officer

Attachment(s): ECCC Comments Excel Sheet

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)