

Review Comment Table

Board:	MVLWB
Review Item:	All Season Road Project - Cultural Heritage Protection Plan - (MV2014F0013 and PC2014F0013)
File(s):	MV2014F0013 PC2014F0013
Proponent:	CanZinc Corporation
Document(s):	Cultural Heritage Protection Plan (8.14 MB)
Item For Review Distributed On:	May 27 at 14:30 Distribution List
Reviewer Comments Due By:	June 24, 2020
Proponent Responses Due By:	July 8, 2020
Item Description:	<p>July 15, 2020 Update: Subsequent Submission required</p> <p>Board staff and Parks Canada note CZN’s agreement to incorporate additional Dene Knowledge (DK) into the Phase 1 Archaeological Impact Assessment (AIA), and the Phase 1 Cultural Heritage Protection Plan (CHPP) (see comment: LKFN-3). Further, given comments from First Nation organizations about the opportunity to review the AIA (see comments: ADKFN-1, 11; LKFN-2), it appears necessary for CZN to engage further with Parties on the AIA and CHPP, and an update to the CHPP may be warranted based on this engagement.</p> <p>Board staff and Parks Canada do not feel that there is adequate evidence on the record to make a decision on the Plan until it is updated based on the issues discussed above. As CZN has agreed to major changes identified during the review, a second review will be required prior to the Board and Parks Canada making a decision on the Plan. Board staff and Parks Canada also suggest that CZN could update the CHPP based on the additional comments of the first review of the CHPP (below) to limit repetitive comments during the second review.</p> <hr/> <p>Canadian Zinc Corporation (CZN) has submitted its Cultural Heritage Protection Plan on May 8, 2020 for the Prairie Creek All Season Road Project. This Plan is required under the Mackenzie Valley Land and Water Board’s (MVLWB’s) jurisdiction: Permit MV2014F0013, condition 82. This Plan is required under Parks Canada jurisdiction (lands within Nahanni National Park Reserve): Permit PC2014F0013, condition 82.</p> <p>Using the Online Review System (ORS), reviewers are invited to submit comments and recommendations on the document linked below by the review comment deadline specified. Please note that both Parks Canada and the Board</p>

are using the ORS to gather comments, therefore all comments will be considered by both jurisdictions at the same time. If reviewers seek clarification on the submission, they are encouraged to correspond directly with the proponent prior to submitting comments and recommendations. Reviewers may also wish to consider providing an overarching recommendation regarding whether they are in support of the submission to provide context for comments and recommendations and to assist the Board with its decision.

The document that has been uploaded to this review is also available on our public Registry. If you have any questions or comments about the ORS or this review, please contact the Board staff or Parks Canada staff identified below.

Jaqueline Ann Ho, Regulatory Specialist, MVLWB

Telephone: (819) 766-7455 Email: jho@mvlwb.com

Kimberley Murray, Regulatory Specialist, MVLWB

Telephone: (819) 766-7458 Email: kmurray@mvlwb.com

Allison Stoddart, Environmental Assessment Specialist, Parks Canada

Telephone: (819) 827-3436 Email: allisonstoddartpca@gmail.com

Contact Information:

Jacqueline Ho 867-766-7455
Kim Murray (867) 766-7458

Comment Summary

CanZinc Corporation (Proponent)				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	General File	Comment (doc) CZN letter dated Sep 30, 2019 re ADKFN. Recommendation		
Acho Dene Koe First Nation: Scott Mackay				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	p. I Revision History	Comment Revision History includes edits resulting from comments by Prince of Wales Northern Heritage Centre (PWNHC) and Parks Canada Agency (PCA). ADKFN notes that these agencies have had access to and are familiar with previous	July 8: The AOA can be found on the Review Board's registry for EA1415-01, document no. 379. Re AIA's, the 2009 and 2013 AIA's are also on that registry, documents 196 and 195. The Phase 1 winter road AIA	

		<p>archaeological documents, namely an archaeological overview and two archaeological impact assessments. To ADKFN's knowledge ADKFN has not reviewed these documents and is therefore at a disadvantage regarding assessment of this CHPP.</p> <p>Recommendation ADK should be provided with previous AOA and AIA reports for review to inform a thorough assesment of potential impacts and identification of avoidance, mitigation and accommodation options.</p>	<p>has not yet been released publicly.</p>	
2	<p>p. v Acronyms and Abbreviations 1.2 Purpose para. 2 2.0 Project description para. 1 4.1 Regulations and Definitions para. 1</p>	<p>Comment ADKFN is currently not considered, reflected or listed in the CHHP which is highlighted by ADKFN's absence not only in the Acronyms and Abbreviations list, but throughout out the entire document. .</p> <p>Recommendation Given that ADKFN has rights and interests that will be impacted by Phase 1 Winter Road and Phase 2 All Season Road activites, ADKFN's rights and interest must be considered, reflected and listed in the CHPP. In addition, ADKFN must be involved in the development of avoidance, mitigation and accommodation measures, including direct involvement in monitoring and establishment of clear communcation protocols between CanZinc and ADKFN. Further, there is no acknowledgement of the ongoing Treaty negotiations between ADKFN, GNWT and Canada and that the proposed work is being completed within ADKFN's traditional territory and in the area covereded by the</p>	<p>July 8: We note that ADKFN consider that their 'overlapping' territory encroaches on the first few kilometres of the proposed ASR alignment from the junction with the Nahanni Butte access road. Regarding mitigation for the Phase 1 road, we previously met with Chief Hope and advisors on September 17, 2019 and subsequently summarized the understanding from that meeting in a letter dated September 30, 2019 (attached). ADKFN are encouraged to forward to us their AIP relating to archaeological sites and burials for consideration. As previously noted, road monitoring will be overseen by the Road Oversight Committee.</p>	

		Framework Agreement and Agreement in Principle (AIP). In addition, there should be reference and consideration of relevant sections of Chapter 18 of ADKFN's AIP relating the archaeological sites and burials, should be quoted here.		
3	1.0 Introduction para 1 line 2	<p>Comment In the introduction section, the purpose of the plan is to "outline the methods for protecting and managig cultural heritage sites." An important feature to adequately protection cultural heritage resources is to ensure there are clear and common understanding of how cultural heritage features are identified.</p> <p>Recommendation The quoted phrase should be changed to: "the methods for identifying, protecting, and managing" and CanZinc must include ADKFN in establishing suffiicient approaches to identifying cultural heritage resources.</p>	<p>July 8: We agree the phrase should be changed to: "the methods for identifying, protecting, and managing". ADKFN are welcome to provide infrmation on identifying cultural heritage resources.</p>	
4	1.2 Purpose para. 1 line 2	<p>Comment ADKFN has concerns that the CHPP does not adequately identify and account for both known and unknown cultural heritage sites and resources. It's important that all cultural heritage resources are protected and managed regardless of whether they were previouslt identified or not.</p> <p>Recommendation To adequately address both known and not yet known cultural heriatge resources the plan must be changed to: "ÃcÂ€Â¡ impacts to any previously recorded or as yet unidentified cultural heritage sites along the winter road alignment."</p>	<p>July 8: OK</p>	

5	1.2 Purpose para. 1 line 3 4.3 Accidental Finds Protocol bullet No. 5	<p>Comment In addition to territorial and federal regulatory bodies, ADKFN specific protocols and processes for site discovery much be considered and applied. Further, ADKFN is not included in the protocol as an agency to be informed of accidental discovery.</p> <p>Recommendation The CHPP must reflect ADKFN's protocols, jurisdiction and authority over its cultural heritage resources. As a result, the CHPP should be revised to state that "Applicable regulatory bodies including the Acho Dene Koe First Nation (ADKFN)." Bullet No. 5 in the Accidental Finds Protocol should state that the Park Superintendent, and/or PWNHC Archaeologist should inform ADK of any accidental discoveries of artifacts, burials, or other cultural heritage features.</p>	<p>July 8: It would be improper for CZN to dictate to Parks Canada or the PWNHC who they should inform in the event of accidental discovery of heritage resources.</p>	
6	1.2 Purpose para. 3	<p>Comment For access to the design and construction plan, the reader is directed to a link in Appendix A; however the link fails. The development plan information is critical information for ADK to review the effectiveness of previous archaeological studies and this CHPP.</p> <p>Recommendation ADKFN must be provided with the information in Appendix A to inform a thorough assessment of potential impacts and identification of avoidance, mitigation and accommodation options.</p>	<p>July 8: We will amend the link.</p>	
7	1.2 Purpose para. 3	<p>Comment The CHPP refers to a previous archaeological overview, and two previous archaeological impact assessments, but there is no access to them in Appendix A.</p> <p>Recommendation The CHPP</p>	<p>July 8: See our response to ADKFN 2.</p>	

		Appendix A should provide links to previous archaeological study reports. Any work (including surveying) conducted within or has impacts to ADKFN's territory must be accompanied by an ADKFN monitor, as identified by the Nation.		
8	2.1 Winter Road Construction Approach para. 2	<p>Comment This is a critical time for the recognition of previously unrecorded archaeological material. The initial tree cutting, clearing, and stump removal is when Monitors, employees and contractors will either notice archaeological material or cultural features--or not. But Section 2.1 does not refer to ADK Monitors, or link to 4.3 Accidental Finds Protocol and 5.0 Adaptive Management</p> <p>Recommendation Section 2.1 should address how critical the initial RoW clearing is to discovery of previously unrecognized archaeological material or cultural heritage features. In addition, there is ADKFN is not considered or included in any of the approaches to ensure ADKFN's rights and interest are preserved during clearing activities. The process should be associated with other relevant sections of the CHPP, like 4.3 Accidental Finds protocol and 5.0 Adaptive Management.</p>	<p>July 8: See our response to ADKFN 2, especially the Sep 2019 letter which addresses RoW clearing re ADKFN's concerns for their claimed 'overlapping' territory.</p>	
9	2.1 Winter Road Construction Approach para. 3	<p>Comment The winter road description does not give a lot of detail. It does not mention if the winter road or all seasonal road RoWs are marked out by stakes or ribbons.</p> <p>Recommendation The winter road RoW should be marked out in some way in advance of clearing to give ADK Monitors an</p>	<p>July 8: The road alignment is ribboned. Our Sep 2019 letter addresses RoW clearing re ADKFN's concerns for their claimed 'overlapping' territory - no cuts are planned over this section and stumps will not be removed.</p>	

		<p>opportunity to look carefully at the corridor before the clearing starts. During clearing ADKFN Monitors must be included as stumps are pulled and road-cuts made.</p>		
10	3.2 Archaeological Overview Assessment	<p>Comment A summary of existing knowledge and an interpretation of potential archaeological sites (Murphy 2016) informed by input from other First Nations. ADKFN Traditional Knowledge and Land Use has not been meaningfully sought and integrated into the CHPP.</p> <p>Recommendation In advance of decision-making on the CHPP, ADKFN must be provided with the capacity and resources to conduct a Traditional Knowledge and Land Use Study which would inform a revised report that includes ADKFN traditional knowledge.</p>	<p>July 8: Further to our September 17, 2019 meeting with Chief Hope, as stated in our Sep 2019 letter, "With respect to the incorporation of ADKFN's TK knowledge in the Phase 2 ASR development, as we noted, an exercise is already underway to accumulate and incorporate additional TK into plans for Phase 2. The Company is amenable to further engaging with ADKFN to agree a suitable process for acquiring and including ADKFN's TK in this exercise, and addressing any remaining heritage resource protection concerns ADKFN may have".</p>	
11	3.3 Archaeological Impact assessments paras. 2 3.4 Traditional Knowledge	<p>Comment Two impact assessments have been made of 9 camps, geotechnical testing locations and along ".selected portions." of the winter road. "The AIAs included low-level aerial reconnaissance , pedestrian survey of high potential areas, and the judicious placement of shovel tests in areas of high potential with sediments present." This description implies that a certain proportion of the winter road RoW has had minimal physical testing. The CHPP notes that other First Nations were involved in the impact assessment, but ADKFN was not.</p> <p>Recommendation The previous archaeological impact assessment</p>	<p>July 8: See our responses to ADKFN 1 and 2.</p>	

		reports should be made available to ADKFN Lands Office for a review and moving forward ADKFN should be involved in all assessment and monitoring activities.		
12	3.3 Archaeological impact assessments para. 5	<p>Comment The following state is contradictory to a previous statement that communicates that an AIA of JiRx-1 will be required: "it is recommended that no further archaeological sites be required for the WR." Recommendation For clarity, the statement should be revised to: "it is recommended that a further AIA be conducted at JiRx-1 prior to construction on the WR."</p>	<p>July 8: The CHPP text is correct as written. Further AIA is planned for the Phase 2 ASR, not the Phase 1 WR.</p>	
13	4.2 Cultural Heritage Resource Site Types	<p>Comment In this section, the CHPP needs to acknowledge that the absence of any grave site evidence (e.g. grave marker, bones, etc.) does not mean graves were never there. Recommendation The CHPP should note that graves may have been present at sites that now contain only lithic artifacts, because organic remains are fragile and decompose over centuries. This paragraph should refer the reader to the glossary of terms on p. v.</p>	<p>July 8: The artifacts found do not indicate dwellings. A more substantial site where people may have lived might suggest the potential for graves nearby, but this is not thought to be the case.</p>	
14	4.4 Worker Orientation and Training	<p>Comment The ADK Monitors should be trained as well as construction staff. One day should be made available for training. Recommendation ADK Monitors should be specifically mentioned here. Cross-cultural training should be increased from two hours to one day and should focus on archaeological material and culture heritage features.</p>	<p>July 8: See our response to ADKFN 2.</p>	

15	5.0 Adaptive Management para. 1	Comment The ADK and their traditional use study are not mentioned Recommendation In advance of decision-making on the CHPP, ADKFN must be provided with the capacity and resources to conduct a Traditional Knowledge and Land Use Study which would inform the adaptive management section. In addition, CanZinc must work collaboratively with ADKFN to ensure ADKFN monitors have oversight in WR activities.	July 8: See our responses to ADKFN 2 and 10.	
16	5.0 Adaptive Management para. 3 bullet 1a	Comment The ADK are not mentioned in the Management and Monitoring Plan Recommendation The ADK should be principal members of the Management and Monitoring Plan. ADK traditional use should also be incorporated into the plan.	July 8: See our responses to ADKFN 2 and 10.	
17	Appendix A	Comment The link to the road map book does not work Recommendation The link to the Access Road Map Book should be fixed.	July 8: OK	

Dehcho First Nations: Carrie Breneman

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	General Comment	Comment N/A Recommendation Dehcho First Nations (DFN) supports the comments provided by Li'í'dli?i? Ku'e' First Nation and Nahâ Dehé Dene Band on Canadian Zinc Corporation's Cultural Heritage Protection Plan.		

GNWT - ENR - EAM (Environmental Assessment and Monitoring): Central Email GNWT

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
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1	General File	Comment (doc) ENR Letter - No Comment or Recommendations at this time. Recommendation		
Liidlii Kue First Nation (Ft Simpson): Trieneke Gastmeier				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
7	General File	Comment (doc) Joint submission of LĺĺDLII KU´E´ FIRST NATION (LK) and NAHA DEHÉ DENE BAND (NDDB) Recommendation		
8	General File	Comment (doc) (Submitted after Due Date) Joint submission of LĺĺDLII KU´E´ FIRST NATION (LK) and NAHA DEHÉ DENE BAND (NDDB) Recommendation		
1	Joint submission of LĺĺDLII KU´E´ FIRST NATION (LK) and NAHA DEHÉ DENE BAND (NDDB)	Comment These comments are being submitted jointly on behalf of Na?á? Dehé Dene Band (NDDB) and Lí'í'dli?'i?' Ku?'e?' First Nation (LK). Recommendation None		
2	CHPP Section 3.3	Comment The communities have not reviewed the Archaeological Impact Assessment (AIA) for the Winter Road nor have they reviewed the mitigation strategy for site 531X (JiRx-1). Most archaeological sites within the Northwest Territories are Indigenous in origin and therefore Indigenous communities should be intimately involved with all aspects of cultural heritage work. Moreover, the Indigenous Knowledge from the current Dene Knowledge Study was supposed to be incorporated	July 8: We're in agreement with this. However, consistent with the NDDB-LK addendum, we note that it was agreed by the parties that results from the Dene Knowledge Study were only to be included in Phase 2 documents.	

		<p>within these documents.</p> <p>Recommendation Please provide LK and NDDDB with a copy of the AIA for the Winter Road to review and provide comment. LK and NDDDB require the opportunity to review all cultural heritage work moving forward.</p>		
3	CHPP Section 3.4, 5.0	<p>Comment This CHPP has been released prior to the completion of LK and NDDDB's Dene Knowledge Study. In 2017, the Mackenzie Valley Review Board (MVRB) released its Report of Environmental Assessment and Reasons for Decision (REA). Within this REA, the MVRB concluded that the Project "is likely to cause significant adverse impacts on cultural and heritage resources" (Page vi) and recommended that "Traditional Knowledge from all potentially-affected Aboriginal groups is necessary to ensure culture and heritage resources are protected, to support other measures in this REA, and to support and inform project design, mitigations, monitoring, and adaptive management." (Page vi) Additionally, the MVRB stated that "The developer will conduct an AIA [Archaeological Impact Assessment] to the specifications detailed in commitments #215 and #216 in Appendix C of this REA. [this should] incorporate all evidence of place names, traditional land use, traditional knowledge, cultural and spiritual use and harvest-ing...along the final alignment of the ASR, at borrow site locations, and other areas where ground disturbance is proposed." (App A, Page 16). In response to this requirement, LK</p>	<p>July 8: We note that the NDDDB-LK addendum provides additional context to this recommendation, therefore our response is in relation to the addendum. We agree that since the Phase 1 winter road did not proceed last winter, this provides an opportunity to consider the incorporation of additional DK in the Phase 1 AIA, based on the results of the DKS. However, since all areas of disturbance associated with the proposed Phase 1 road were visited and investigated during the AIA, it is our expectation that no further fieldwork will be necessary prior to the Phase 1 winter road. Similarly, we agree there is an opportunity to incorporate additional DK into the Phase 1 CHPP.</p>	

		<p>and NDDB commenced project-specific Dene Knowledge Study (Study). This Study identifies important cultural sites within the Project area. Currently the Study is being finalized and consequently has not yet been incorporated into the Archaeological Impact Assessment or the current Cultural Heritage Protection Plan. Part B of the Project's land use licence also requires NZC to make every reasonable effort to consider and incorporate Dene Knowledge, and to describe how it is incorporated.</p> <p>Recommendation The Archaeological Impact Assessment and the Cultural Heritage Protection Plan should be updated after the completion of LK and NDDB's Dene Knowledge Study, prior to approval. The inclusion of Dene Knowledge should be a collaborative process between NZC and the Road Oversight Committee.</p>		
4	CHPP Section 4.3	<p>Comment There is no recommendation that LK and NDDB be informed should unanticipated archaeological resources be located. Notifying impacted First Nations is recommended under the Mackenzie Valley Land Use Regulations.</p> <p>Recommendation Include a statement that LK and NDDB will be informed should unanticipated archaeological resources be located.</p>	July 8: OK	
5	CHPP Section 4.4	<p>Comment There is no recommendation that LK and NDDB Dene Monitors participate within the Worker Orientation</p>	July 8: CZN has already made the commitments described in the recommendation, however	

		and Training for the identification of cultural heritage resources, nor is there the recommendation that LK and NDDDB Dene Monitors participate as monitors onsite during construction. Recommendation Ensure that LK and NDDDB Dene Monitors are invited to participate in the Worker Orientation and Training, when feasible, for the identification of cultural heritage resources. Ensure that LK and NDDDB Dene Monitors are invited to participate in all fieldwork activities.	we do not think it necessary to include them in the CHPP.	
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6	CHPP Section 5.0	Comment The CHPP references the Road Oversight Committee (ROC) as if it is already fully established and operating; note that the ROC will only officially be established after the Agreements from which it emerges are signed. Recommendation Please correct the reference to the Road Oversight Committee to reflect its current status.	July 8: We note that the NDDDB-LK addendum provides additional context to the comment and recommendation, therefore our response is in relation to the addendum. The addendum confirms the ROC has been initiated. The CHPP therefore does not require correction.	
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MVLWB: Kim Murray

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	Potential to Impact Cultural Heritage Sites Plain Language Summary and 3.1 Potential Impacts to Cultural Heritage Sites	Comment Board staff note that the Plain Language Summary states that the “Development of the WR involves construction activities with potential to impact cultural heritage sites. These include: Winter Road Construction; and Geotechnical Testing Program”; However, Under 3.1 it is stated that “The development of the WR and geotechnical testing program involve a number of different activities with the potential to impact cultural	July 8: We will update.	

		<p>heritage resource and include: Non-Typical Winter Road Construction; Geotechnical Testing Program; and Set up and Operation of Maintenance Camps". It is unclear why these sections would be different, and why the Set up and Operation of Maintenance Camps would not be included in the statement in the Plain Language Summary.</p> <p>Recommendation Board staff recommend CZN discuss the discrepancy, or update the CHPP as necessary.</p>		
2	5.0 Adaptive Management	<p>Comment The text states that "Part B of the Project's land use licence contains two conditions related to the incorporation of Dene Knowledge into submissions required by the MVLWB. One condition requires that CZN make every reasonable effort to consider and incorporate any DK made available to it. The second requires CZN to specifically identify any DK recommendations made and to describe how they were incorporated into each submission. In this section of the plan, we describe CZN's approach to meeting these licence conditions." Board staff note that the CHPP is required under the Land Use Permit, not "land use license". Further, the conditions about Traditional Knowledge are in section 26(1)(q) of Permit MV2014F0013 and PC2014F0013, not Part B.</p> <p>Recommendation Board staff recommend the CHPP be updated to include the correct reference to the Land Use Permits issued for the Prairie Creek Winter Road and All Season Road.</p>	July 8: OK	

Parks Canada: Audrey Steedman

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	Revision History	<p>Comment The revision numbers in the Revision History table are not correct and the description does not include the extensive editorial comments provided by Parks Canada that were incorporated into two versions of the document. Parks Canada's comments were done on Version 1 (cover date of September 27, 2019) and Version 2/3 (cover dates of September 27, 2019 /February 6, 2019). Versions 2 and 3 have the same content, except for a date change on the covers. There are 4 versions of the report: Version 1 is September 27, 2019 ; Version 2 is January 31, 2020; Version 3 is February 6, 2020 and Version 4 is May 8, 2020.</p> <p>Recommendation Correct the revision numbers in the revision history to reflect the editorial comments provided by Parks Canada. Specifically change the Revision 2 description from "Addition of Edits from PWNHC" to "Addition of edits from PWNHC and Parks Canada" and change this revision date to January 31, 2020. Change Revision 3 to "Addition of Edits from PWHNC" and change revision 3 date to February 6, 2020. Add a Revision 4 entry with the description of "Addition of Edits from Parks Canada Agency" with the revision Date of May 8, 2020.</p>	<p>July 8: OK</p>	
2	Footer for the document	<p>Comment There is a confusion as to what version of the document this is. That may partly be due to the date not being updated on one of the versions. This</p>	<p>July 8: OK</p>	

		document is Version 4 not Version 3 according to our records. Recommendation Change the version number in the footer to Version 4.		
3	Plain Language Summary	Comment There is no reference to what ROW stands for where it is first mentioned in the document. Recommendation change ROW to right-of-way (ROW)	July 8: OK	
4	Plain Language Summary	Comment It is unclear which Winter Road is being referred to in relation to the discovery of the precontact site during the archaeological impact assessment for the Phase 1 Winter Road geotechnical program. This was changed from the last version of the heritage protection plan which clearly stated that the archaeological site was discovered "within the 1980s winter road right of way". It is important to include this as the site appears to have been impacted by the 1980s road construction. The AIA done for that project was limited. The presence of a site within the footprint of this previous road construction speaks to the necessity to have a thorough AIA done for the All Season Road Construction that takes into consideration the footprint of the previous road as a potential location for heritage resources. Recommendation Add that the precontact archaeological site was recorded along the WR within the 1980s winter road right-of-way.	July 8: OK	
5	Glossary of Terms	Comment Under the definition for cache is the phrase "cultural artifacts alternatives". It is not	July 8: OK	

		clear what this means. Recommendation Clarify what the phrase "cultural artifacts alternatives" means.		
6	Glossary of Terms	Comment Typo under the definition of Archaeological Artifacts "un" Recommendation Change "un" to "an"	July 8: OK	
7	Glossary of Terms	Comment Grammatical errors in definition of a scraper Recommendation Correct the typo/edit the statement "a tool presumable [typo] used in" and delete "(s)" at end of the sentence.	July 8: OK	
8	1.3 Regulatory Guidance	Comment National Parks Act is not referenced properly. The proper reference to this act is the Canada National Parks Act. Recommendation Change the National Parks Act to the Canada National Parks Act.	July 8: OK	
9	3.3 Archaeological Impact Assessments	Comment The document states that "If there is a change is [typo] scope for the WR an additional AIA will be required." This is not necessarily the case. A change in scope of construction would require a review to determine if further AIA work is required. Recommendation Change "If there is a change is [typo] scope for the WR an additional AIA will be required." to indicate if there is a change of scope for the WR, regulators will be contacted to review if additional AIA work or recommendations are required.	July 8: OK	
10	3.3 Archaeological Impact Assessments	Comment The statement Camp 42 in NNPR will require and [typo] AIA prior to the Phase 2 ASR needs to be clarified. Camp 42 in NNPR is slated to remain open in a reduced form as an emergency shelter and maintenance camp.	July 8: OK	

		<p>The portion of the camp to remain open for all season use may require additional review and potential AIA work. All of the camps will be part of the AIA in terms of the Phase 2 all season road construction. The camps set up for the current WR project are described as camps "to support the construction and use of the winter road" (AIA by Murphy 2020). Construction camps for the ASR will need to be assessed as per the footprint required for this larger all season work.</p> <p>Recommendation Clarify that the camps that will remain open for emergency shelter and maintenance camps will be reviewed for all season use and all camps constructed for the Phase 2 ASR will be evaluated as part of the ASR AIA.</p>		
11	3.4 Traditional Knowledge	<p>Comment A description is provided that traditional knowledge was collected between 2009 and 2012 for two winter road construction projects. The traditional knowledge that was collected for the 2018 and 2019 projects was supposed to be included in the corresponding AIA reports. This was not done. The importance of this knowledge to understanding the landscape, cultural history and ensuring avoidance of these areas and like areas is a critical component of cultural heritage protection for preservation and interpretation. This data should be included in a revised predictive model and the AIA for the phase 2 ASR.</p> <p>Recommendation Include a statement that TK and DK will be incorporated into the revised predictive model and AIA for any</p>	<p>July 8: We're not opposed to the recommendation, but we don't agree with the comment that TK acquired between 2009 and 2012 wasn't included in the AIA report. The TK provided indicated land uses and locations (trails, camps). That was fundamental to the design of the field studies. We also talked to community members about the programs and where we should be looking for both archaeological and contemporary use sites. The 2009 and 2012 field programs included community members. During the 2018 and 2019 field programs, members of two local First Nations took part in the work and were</p>	

		future construction projects including the phase 2 ASR.	constantly consulted on the program - where to dig, what had potential.	
12	4.1 Regulations and Definitions	<p>Comment Parks Canada defines both archaeological resources and cultural resources. The document includes a definition for an archaeological resource but does not include the definition of a cultural resource. Inclusion of the Parks Canada cultural resource definition is important as the term cultural resource or cultural heritage resource is used in this document.</p> <p>Recommendation Keep the definition of an archaeological resource and add: Parks Canada defines a cultural resource as "a human work, an object, or a place that is determined, on the basis of its heritage value, to be directly associated with an important aspect or aspects of human history and culture. The heritage value of a cultural resources is embodied in tangible and/or intangible character-defining elements." (Parks Canada 2013)</p>	July 8: OK	
13	4.1 Regulations and Definitions	<p>Comment National Parks Act is not referenced properly. The proper reference to this act is the Canada National Parks Act.</p> <p>Recommendation Change the National Parks Act to the Canada National Parks Act.</p>	July 8: OK	
14	4.2.1 Precontact Archaeological Sites	<p>Comment Indigenous is not capitalized.</p> <p>Recommendation Capitalize Indigenous.</p>	July 8: OK	
15	4.2.2 Historic Archaeological Sites Artifact Scatters	<p>Comment The reader may not know what a class of artifact means for historic archaeological sites. Under Precontact</p>	July 8: OK	

		archaeological sites examples of artifact classes are included. Recommendation Include some examples of artifact classes such as glass bottles, tin cans, butchered bone, broken ceramics, metal artifacts under the Historic Archaeological Sites Artifact Scatters section.		
16	4.2.2 Historic Archaeological Sites Campsites	Comment The definition of an historic campsite includes features that occur unrelated to campsites, such as hunting blinds, caches and axe cut stumps. Campsites can also include other features such as stone circles from temps and other types of culturally modified trees - like those carved for moose hide processing. Recommendation Include separate headings and definitions for hunting blinds, caches, cairns and culturally modified trees under Historic Archaeological Sites. Include stone circles under the list of campsite features.	July 8: OK	
17	4.2.2 Historic Archaeological Sites Campsites	Comment It is not clear what is meant by "cultural artifacts alternatives" Recommendation Explain what is meant by cultural artifacts alternatives.	July 8: OK	
18	4.2.5 Archaeological Impact Assessment Results 2009, 2018-2019	Comment The first sentence in the first paragraph is incomplete and missing words so it does not make sense. Recommendation Edit "In 2009 completed an Archaeological Impact Assessment for CZN in advance..."	July 8: OK	
19	4.2.5 Archaeological Impact Assessment	Comment If this document is to guide staff on identifying cultural activities in the bush, then adding a photo of the modern traditional use camp identified by Praeger in	July 8: OK, if we are able to acquire the photo.	

	Results 2009, 2018-2019	the area would be beneficial. Recommendation Add a photo of the modern traditional use camp identified by Praeger.		
20	4.2.5 Archaeological Impact Assessment Results 2009, 2018-2019	Comment The first sentence in the second paragraph is poorly written and includes "in 2018" twice. Recommendation Edit the sentence including removing the second "in 2018".	July 8: OK	
21	4.2.5 Archaeological Impact Assessment Results 2009, 2018-2019	Comment More information should be included about the nature of the artifacts and their location to assist staff with identifying resources that they may encounter during construction. Recommendation Add more information about the context of the artifacts from the site - that they were exposed on the ground surface.	July 8: OK	
22	4.2.5 Archaeological Impact Assessment Results 2009, 2018-2019	Comment If the purpose of this section is to share the types of resources encountered during previous archaeological work in the area associated with the road construction, then ensure that all resources are included here from not only NNPR but those identified on territorial land as well. It is important that construction crews are aware of what has already been found and it's context as examples in this document. Specifically, that crews may stumble across resources that are on the ground surface, exposed along eroding banks or within buried deposits during construction. Recommendation Either add more contextual information in this section or move these examples into the relevant sections under 4.2 Cultural	July 8: OK	

		Heritage Resource Site Types as examples of known resources from the area based on work to date.		
23	4.3 Accidental Finds Protocol	<p>Comment Under Point #5 there is a statement that is not clear and requires editing: "Based on the location of the find, and all construction personnel will await further instruction."</p> <p>Recommendation Edit the sentence so it makes sense to the reader and provides the appropriate direction.</p>	July 8: OK	
24	References	<p>Comment The Canada National Parks Act is not properly referenced.</p> <p>Recommendation Change National Parks Act to Canada National Parks Act.</p>	July 8: OK	
25	Appendix B Cultural Heritage Resource Sites	<p>Comment The Parks Canada Cultural Resource Management Policy (2013) provides policy requirements for managing cultural resources administered by Parks Canada. Cultural resources are protected under the Parks Canada Agency Act and Canada National Parks Act.</p> <p>Recommendation Replace the reference to the Parks Canada Cultural Resource Management Policy with reference to the Parks Canada Agency Act and the Canada National Parks Act.</p>	July 8: OK	
26	Appendix B Cultural Heritage Resource Sites	<p>Comment Under "References": The protection of cultural and archaeological resources on Parks Canada heritage places should include the Parks Canada Agency Act and the Canada National Parks Act, not the Cultural Resource Management Policy.</p> <p>Recommendation Under "Reference" replace the Parks Canada Cultural Resource</p>	July 8: OK	

		Management Policy with the references for the Parks Canada Agency Act and the Canada National Parks Act.		
27	Appendix B Cultural Heritage Resource Site Types	<p>Comment The organization of the Cultural Heritage Resource Site Types is inconsistent and confusing, resulting in a reference resource document (referred to as a pamphlet) that is cumbersome and not user friendly. The purpose of this "pamphlet" is to provide workers with a reference guide as part of training to be able to recognize archaeological or cultural resources so that they can be protected or mitigated. The information needs to be presented in a simple format that someone with no previous background can easily use. There is an inconsistent presentation of historic, precontact and traditional use sites (which are time periods) with features, artifacts and site types. For example under Precontact Sites are included references to Historic Sites. Features are listed individually under Precontact Sites but grouped together under the term Campsite for the Historic Archaeological Sites section. These features could be part of a campsite, but are also indicative of other functions not related to campsites. The focus should be placed on what workers could come across not on them having to figure out if a site is "traditional use" or "historic". It is often not possible to distinguish time period without archaeological investigation. We do not want people to misidentify something that may be</p>	July 8: OK	

		<p>significant. Instead we want the workers to recognize cultural features and artifacts, so work can be stopped and guidance sought on how to proceed. The guidance may be to photograph, record location and collect an artifact or it may require further investigation to identify the nature and extent of the find. The issue of clearly presenting cultural and archaeological resources could be rectified by simplifying the headings and reorganizing the information so time periods, site types, features and artifact examples occur as distinct headings with a definition and multiple relevant examples underneath each heading. For example, define an "Isolated Find" and provide a precontact and historic time period example.</p> <p>Recommendation Do not use time periods to organize cultural types of sites, features and artifacts. The site types should be listed separate from the time periods with examples from each time period that they occur in. The definitions of the time periods should remain in the document as background. If time periods are going to be used, then make sure you include site types, features and artifacts in the same format under each relevant "time period" they occur.</p>		
28	Appendix B Cultural Heritage Resource Sites	<p>Comment This pamphlet is a stand along document, so technical terminology that is defined in the glossary for the Cultural Heritage Protection Plan will not be available to the workers who receive only the pamphlet.</p>	July 8: OK	

		Recommendation Add a glossary of terms or subheadings to the pamphlet that define a site, feature and artifact.		
29	Appendix B Cultural Heritage Resource Site Types	Comment Use of punctuation and italic is not consistent. Colons are used sometimes after the headings but not always. There are many typos in the document. Avoid using the term "etc." as the users of this document will not understand what etc may be referring to. Recommendation Correct the typos and either use a colon (:) after the headings or do not use a colon. If italic is used, make sure the reader understands why. Avoid using the word etc. Instead use "such as" at the beginning of the list of examples or define what the "etc." is referring to.	July 8: OK	
30	Appendix B Cultural Heritage Resource Site Types Precontact Sites Isolated Finds	Comment This section states: "Precontact archaeological site types may include; [typo];" should be ':] ISOLATED FINDS: that can be Precontact or Historic." This section describes Precontact isolated finds, so historic artifacts should not be referenced here. Recommendation Remove the word "historic" in the sentence "These can be Precontact or Historic" under the Precontact Site type description for an isolated find. Change ";" to :. Add Isolated Find under the Historic Sites section with examples of historic isolated finds.	July 8: OK	
31	Appendix B Cultural Heritage Resource Site Types Precontact	Comment Artifact scatter definition under Precontact Sites states that artifact scatters can be either Precontact or Historic. Reference to historic site types should fall under the Historic Sites section not in the Precontact	July 8: OK	

	Sites Artifact Scatters	Site section or site types, features and artifacts should not be presented under time periods. Recommendation Delete "Historic" under Precontact Site artifact scatters (page 3) and include Artifact Scatters as a site type under Historic Sites. Use relevant examples of artifact scatters as they pertain to Precontact vs Historic sites.		
32	Appendix B Cultural Heritage Resource Site Types Precontact Sites Stone Features	Comment Stone Features are listed under Precontact Sites. Stone features including tent rings, cairns and caches were also used historically. It is often not possible to distinguish precontact and historic stone features. Recommendation Include Stone Features under both Precontact Sites and Historic Sites or change the document to list the site types separately from the time periods.	July 8: OK	
33	Appendix B Cultural Heritage Resource Site Types Precontact Sites Quarry Sites	Comment It is not necessary to use jargon in the definitions. Delete the term tool stone under Quarry Sites. Recommendation Delete tool stone from the definition of a quarry site.	July 8: OK	
34	Appendix B Cultural Heritage Resource Site Types Precontact Sites Quarry Sites	Comment Lithic debitage is italicized but not defined. This pamphlet does not have a glossary (if that is the reason for the italic). There is a glossary in the Cultural Heritage Protection Plan document, however, the pamphlet is a stand alone document provided to workers. Therefore, These types of technical archaeological terms should be defined when used, or a glossary added to the pamphlet. It is not clear why some words are italicized.	July 8: OK	

		<p>Recommendation Either define the term lithic debitage or use waste material from stone tool manufacture. Be constant with the use of italic lettering ensuring the reader understands what the italic means.</p>		
35	<p>Appendix B Cultural Heritage Resource Site Types Precontact Sites Precontact Artifacts</p>	<p>Comment The list of what precontact artifacts are made of does not represent the full range of materials that may be preserved. This definition should also reflect that many materials are not preserved and precontact artifacts are often only part of the original object. The artifact may also be incomplete or broken. This may aid in workers recognizing artifacts.</p> <p>Recommendation Under material types add antler and shell. Add a statement that not all components of the original artifact are preserved over time and what we find is only a portion of the original item, often broken. Provide examples such as a stone knife was often hafted or attached to a wood, bone or antler handle with sinew. Usually only the stone knife, or a fragment of it is present at a site.</p>	<p>July 8: OK</p>	
36	<p>Appendix B Cultural Heritage Resource Site Types Historic Archaeological Sites</p>	<p>Comment Under the list of Historic Archaeological Site Types include stone features. Caches, cairns and stone circles for tents were used both in precontact and historic time periods.</p> <p>Recommendation Add "stone features, such as caches, cairns and stone circles" to the sentence " Historic site types include isolated finds and artifacts [typo] scatters".</p>	<p>July 8: OK</p>	
37	<p>Appendix B Cultural Heritage</p>	<p>Comment The first sentence under campsite is not grammatically correct and is</p>	<p>July 8: OK</p>	

	Resource Site Types Historic Archaeological Sites Campsites	confusing to understand. Recommendation Edit the sentence: "CAMPSITES that may represent prospecting, hunting or trapping activities and include features such as log cabins, tent frames, hunting blinds, depressions, axe cut stumps and caches."		
38	Appendix B Cultural Heritage Resource Site Types Historic Archaeological Sites Campsites	Comment The definition of historic campsites lists a number of features that occur on their own and some of which were listed separately under Precontact artifacts. The list of types of structures does not include stone circles or bermed foundations. Tents with stones circling the base are found at precontact and historic sites. Hunting blinds can also be Precontact features. It is not clear what "cultural artifacts alternatives" means. Recommendation Redefine Historic Campsites. Include features that may be possible, but also list these separately as they can be their own site type separate from a historic campsite. This includes hunting blinds, caches and axe cut stumps. Change ... include features such as "..." to "...may include features such as ..." Explain what is meant by "cultural artifacts alternatives" . Add stone circles and bermed foundations to examples of historic structures.	July 8: OK	
39	Appendix B Cultural Heritage Resource Site Types	Comment Add Cultural Modified Trees as a site type and include cut stumps, blazes, etc. Define their cultural significance and how to identify them. Tree blazes were defined in the glossary of the Cultural Heritage Protection Plan, but not in the pamphlet	July 8: OK	

		<p>which is a stand alone document. Culturally modified trees are representative of precontact, historic and traditional use sites.</p> <p>Recommendation Add a section called Culturally Modified Trees. Define how to identify cut stumps and what a tree blaze is. Include that there are other kinds of culturally modified trees, like moose hide drying features.</p>		
40	<p>Appendix B Cultural Heritage Resource Site Types Trapping Sites</p>	<p>Comment Deadfall traps made of cut logs and branches can be precontact or historic.</p> <p>Recommendation Include trapping features under historic and precontact sites as well. Use the example of a deadfall trap.</p>	July 8: OK	
41	<p>Appendix B Cultural Heritage Resource Site Types Examples of Historic Artifacts Observable on the Surface</p>	<p>Comment There is a subheading called "Examples of Historic Artifacts Observable on the Surface". Precontact artifacts may also be observed on the surface. Both precontact and historic artifacts could be located during construction on the surface, eroding from bank or slope edges or in a buried context displayed or revealed from construction work.</p> <p>Recommendation Include that precontact artifacts are also surface finds and that both precontact and historic artifacts could be found during construction in a buried context or eroding from a bank or slope edge.</p>	July 8: OK	
42	<p>Appendix B Cultural Heritage Resource Site Types Archaeological Impact Assessment Results</p>	<p>Comment The examples of precontact artifacts found during the impact assessment should be included underneath the relevant site type and not added as a separate heading. Photos of the traditional use sites (2009 as well as 2018 from Indigenous crew members) that were documented</p>	July 8: OK, subject to photo acquisition.	

	<p>during these projects as well as the other sites found outside of the park should be included. It is not necessary in this pamphlet to have a separate heading of impact assessment results. It would be more useful for the users of the document to have these examples included under the site types.</p> <p>Recommendation The example of the precontact artifacts recovered during the impact assessment should be moved under the Precontact Archaeological Site section as an example of an Artifact Scatter. Reference can be made in the caption that these tools were discovered during the impact assessment. If the Impact Assessment Results is to remain as a stand alone heading, than include all of the site types that have been identified in NNPR and outside the park related to the winter roads and identified during the 2009, 2012, 2018 and 2019 projects.</p>		
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Parent Company of Canadian Zinc

September 30, 2019

Chief Eugene Hope
Acho Dene Koe First Nation
General Delivery
Fort Liard, NT X0G 0A0

Dear Chief Eugene,

Re: **ADKFN's Letter of September 6, 2019**
Prairie Creek Mine All Season Road

We refer to the above noted letter that ADKFN submitted to the Mackenzie Valley Land and Water Board, and to our subsequent meeting on September 17, 2019.

NorZinc (NZC) wishes to reiterate our thanks for meeting with us to discuss the concerns of the First Nation. This letter is intended to document our verbal discussion with respect to two particular items: the proposed Phase 1 winter road and potential for impacts on heritage resources; and, the incorporation of ADKFN's traditional knowledge (TK) in planning for the Phase 2 all season road (ASR) development.

ADKFN described the extent of their traditional territory, and advised that ADKFN 'overlapping' territory encroaches on the first few kilometres of the proposed ASR alignment from the Nahanni Butte access road. ADKFN's concerns with respect to winter road construction over those few kilometres are:

1. information on any muskeg that might be disturbed;
2. that construction occur in a manner that minimizes risks to archaeological or sensitive sites; and,
3. that tree clearing minimizes disturbance to landforms.

We can confirm that winter road construction within the noted few kilometres you refer to as ADKFN overlapping territory will not disturb muskeg. It is preferable to locate the ASR on firm ground, which is typically ground with mature trees rather than muskeg. In addition, winter road construction seeks to minimize disturbance to the ground, and this includes cutting trees at their base and leaving stumps intact, rather than clearing that could disturb landforms. Therefore, the proposed construction will minimize risks to archaeological or sensitive sites, should they be present. We trust this addresses ADKFN's concerns with the winter road.

With respect to the incorporation of ADKFN's TK knowledge in the Phase 2 ASR development, as we noted, an exercise is already underway to accumulate and incorporate additional TK into plans for Phase 2. The Company is amenable to further engaging with ADKFN to agree a

ADKFN
September 30, 2019

Page 2

suitable process for acquiring and including ADKFN's TK in this exercise, and addressing any remaining heritage resource protection concerns ADKFN may have.

Sincerely,

NorZinc

A handwritten signature in blue ink, appearing to read "D. Harpley".

David P. Harpley
VP, Environment and Permitting Affairs



June 24, 2020

Jacqueline Ho
Regulatory Specialist
Mackenzie Valley Land and Water Board
7th Floor – 4910 50th Avenue
P.O. Box 2130
Yellowknife, NT
X1A 2P6

Dear Ms. Ho,

**Re: Canadian Zinc Corp.
Land Use Permits – PC2014F0013 and MV2014F0013
Cultural and Heritage Protection Plan
Request for Comment**

The Department of Environment and Natural Resources, Government of the Northwest Territories has received the plan at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and has no comments or recommendations for the consideration of the Board at this time.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,

Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories

Naza Dehé Dene Band
General Delivery
Nahanni Butte, NT
X0E 0N0
Phone: 867-602-2900
Fax: 867-602-2910

Łíídlíí Kúé First Nation
P.O. Box 469
Fort Simpson, NT
X0E 0N0
Phone: 867-695-3131
Fax: 867-695-2665

June 19, 2020

Mackenzie Valley Land and Water Board
4922 - 48th Street
7th Floor YK Centre Mall
P.O Box 2130, Yellowknife, NT. X1A 2P6

VIA MVLWB Online Review System

RE: Review of Canadian Zinc Corporation - All Season Road Project - Cultural Heritage Protection Plan - (MV2014F0013 and PC2014F0013) (MVLWB)

On May 8, 2020, NorZinc (NZC) submitted a Cultural Heritage Protection Plan (CHPP, Plan) for the Prairie Creek All Season Road Project (Project), which is required under Permit MV2014F0013, condition 81-82. The purpose of this Plan is to prevent and/or mitigate impacts to cultural heritage resources during the Phase 1 Winter Road and Geotechnical Program, which includes winter road construction, geotechnical testing, as well as set up and operation of maintenance camps. The CHPP is not intended to cover work on the All Season Road; a separate Archaeological Impact Assessment is recommended to be completed for the proposed All Season Road prior to Phase 2, and is intended to focus on identifying and recording all cultural heritage sites within the proposed Project area to determine any potential impacts that may occur as a result of the Project.

The CHPP for Phase 1 contains a summary of previous studies related to cultural heritage that were conducted for the Winter Road, including an Archaeological Overview Assessment, an Archaeological Impact Assessment (in which one site was located) as well as past Traditional Knowledge research. The CHPP also includes a description of possible cultural heritage resources that may be encountered during construction, an accidental finds protocol, a description of worker orientation and training related to cultural heritage, and a description of cultural heritage resources adaptive management.

Comment 1 – General

These comments are being submitted jointly on behalf of Naza Dehé Dene Band (NDDB) and Łíídlíí Kúé First Nation (LK).

Recommendation 1 – General

None

Naza Dehé Dene Band
General Delivery
Nahanni Butte, NT
X0E 0N0
Phone: 867-602-2900
Fax: 867-602-2910

Łídlíí Kúé First Nation
P.O. Box 469
Fort Simpson, NT
X0E 0N0
Phone: 867-695-3131
Fax: 867-695-2665

Comment 2 – CHPP Section 3.3

The communities have not reviewed the Archaeological Impact Assessment (AIA) for the Winter Road nor have they reviewed the mitigation strategy for site 531X (JiRx-1). Most archaeological sites within the Northwest Territories are Indigenous in origin and therefore Indigenous communities should be intimately involved with all aspects of cultural heritage work. Moreover, the Indigenous Knowledge from the current Dene Knowledge Study was supposed to be incorporated within these documents.

Recommendation 2

Please provide LK and NDDDB with a copy of the AIA for the Winter Road to review and provide comment. LK and NDDDB require the opportunity to review all cultural heritage work moving forward.

Comment 3 – CHPP Section 3.4, 5.0

This CHPP has been released prior to the completion of LK and NDDDB’s Dene Knowledge Study.

In 2017, the Mackenzie Valley Review Board (MVRB) released its Report of Environmental Assessment and Reasons for Decision (REA). Within this REA, the MVRB concluded that the Project “is likely to cause significant adverse impacts on cultural and heritage resources” (Page vi) and recommended that “Traditional Knowledge from all potentially-affected Aboriginal groups is necessary to ensure culture and heritage resources are protected, to support other measures in this REA, and to support and inform project design, mitigations, monitoring, and adaptive management.” (Page vi) Additionally, the MVRB stated that “The developer will conduct an AIA [Archaeological Impact Assessment] to the specifications detailed in commitments #215 and #216 in Appendix C of this REA... [this should] incorporate all evidence of place names, traditional land use, traditional knowledge, cultural and spiritual use and harvesting...along the final alignment of the ASR, at borrow site locations, and other areas where ground disturbance is proposed.” (App A, Page 16).

In response to this requirement, LK and NDDDB commenced project-specific Dene Knowledge Study (Study). This Study identifies important cultural sites within the Project area. Currently the Study is being finalized and consequently has not yet been incorporated into the Archaeological Impact Assessment or the current Cultural Heritage Protection Plan.

Part B of the Project’s land use licence also requires NZC to make every reasonable effort to consider and incorporate Dene Knowledge, and to describe how it is incorporated.

Recommendation 3

The Archaeological Impact Assessment and the Cultural Heritage Protection Plan should be updated after the completion of LK and NDDDB’s Dene Knowledge Study, prior to approval. The

Naza Dehé Dene Band
General Delivery
Nahanni Butte, NT
X0E 0N0
Phone: 867-602-2900
Fax: 867-602-2910

Łídlíí Kúé First Nation
P.O. Box 469
Fort Simpson, NT
X0E 0N0
Phone: 867-695-3131
Fax: 867-695-2665

inclusion of Dene Knowledge should be a collaborative process between NZC and the Road Oversight Committee.

Comment 4 – CHPP Section 4.3

There is no recommendation that LK and NDDDB be informed should unanticipated archaeological resources be located. Notifying impacted First Nations is recommended under the Mackenzie Valley Land Use Regulations.

Recommendation 4

Include a statement that LK and NDDDB will be informed should unanticipated archaeological resources be located.

Comment 5 – CHPP Section 4.4

There is no recommendation that LK and NDDDB Dene Monitors participate within the Worker Orientation and Training for the identification of cultural heritage resources, nor is there the recommendation that LK and NDDDB Dene Monitors participate as monitors onsite during construction.

Recommendation 5

Ensure that LK and NDDDB Dene Monitors are invited to participate in the Worker Orientation and Training, when feasible, for the identification of cultural heritage resources. Ensure that LK and NDDDB Dene Monitors are invited to participate in all fieldwork activities.

Comment 6 – CHPP Section 5.0

The CHPP references the Road Oversight Committee (ROC) as if it is already fully established and operating; note that the ROC will only officially be established after the Agreements from which it emerges are signed.

Recommendation 6

Please correct the reference to the Road Oversight Committee to reflect its current status.

Naza Dehé Dene Band
General Delivery
Nahanni Butte, NT
X0E 0N0
Phone: 867-602-2900
Fax: 867-602-2910

Łíídlíí Kúé First Nation
P.O. Box 469
Fort Simpson, NT
X0E 0N0
Phone: 867-695-3131
Fax: 867-695-2665

July 8, 2020

Mackenzie Valley Land and Water Board
4922 - 48th Street
7th Floor YK Centre Mall
P.O Box 2130, Yellowknife, NT. X1A 2P6

VIA MVLWB Online Review System

RE: Review of Canadian Zinc Corporation - All Season Road Project - Cultural Heritage Protection Plan - (MV2014F0013 and PC2014F0013) (MVLWB)

Naza Dehé Dene Band (NDDB) and Łíídlíí Kúé First Nation (LK) would like to submit an addendum to the comments provided in the letter dated June 19, 2020 regarding NorZinc's (NZC) Cultural Heritage Protection Plan (CHPP) for the All Season Road Project. This addendum is regarding Comment 3 and Comment 6 in that letter:

Comment 3: In August 2019, NDDB, LK and NZC agreed to initiate a supplemental Dene Knowledge Study (DKS). However, it was understood that the DKS would not be completed in time for Phase 1 Archaeological Impact Assessment (AIA) work. The Phase 1 AIA was completed on that basis, with the knowledge and consent of the parties, and involved fieldworkers from both NDDB and LK.

The Phase 1 Winter Road did not proceed last winter so this provides an opportunity to consider the incorporation of additional DK in the Phase 1 AIA, based on the results of the DKS. Similarly, there is an opportunity to incorporate additional DK into the Phase 1 CHPP.

Comment 6: Although the Environmental Management Agreement (EMA) is not yet finalized between the parties, representatives for NZC, NDDB and LK have been meeting to discuss and coordinate on environmental management planning based on the principles of the Road Oversight Committee (ROC) structure anticipated in the EMA. The interim ROC was in fact initiated in August last year with meetings in Fort Simpson. It is our understanding that all parties have agreed to continue to meet on this basis until the EMA is signed and there is a contractual basis for ROC operations.