



October 22, 2004

Via fax 867- 699-3166 and email [hwiebe@dehcholands.org](mailto:hwiebe@dehcholands.org)

Ms. Heidi Wiebe  
Executive Director  
Deh Cho Land Use Planning Committee  
P.O. 199  
Fort Providence, NT  
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Dear Ms. Wiebe:

**Re: Comments on Draft Land Use Options Atlas**

Canadian Zinc Corporation has reviewed the material contained in your recently published **Draft Land Use Options Atlas (July 2004)** and are pleased to provide the following comments.

Given our longstanding presence in the Deh Cho Region (and our intentions to be there for many more decades to come) our review was undertaken not as a single mining company wishing only to serve its' own specific interests but rather as a member of the Deh Cho Community – meaning we wish to provide your Planning Committee with comments and advice which incorporate a full consideration and balancing of all interests within the Deh Cho.

In a nutshell, we wish to participate in this planning process as a means of helping your Planning Committee be successful in its' efforts at developing and implementing a planning document that is accepted by all as a needed and fair balancing of the (seemingly) different interests now existing in the Deh Cho.

In undertaking our review we did so within the context of the information request defined in the Atlas, namely;

- ? Does the information adequately describe common land uses in the Deh Cho Territory?
- ? Are the analysis and assumptions used appropriate?
- ? Do the options adequately represent your interests?
- ? Which option provides for a level of development and conservation that you are most comfortable with?
- ? Which option (or combination) best meets your needs?
- ? How should the options be revised?

As a lead in to providing our advice and comments, the company wishes to raise with you and your Planning Committee what appears to us as an apparent contradiction in your objectives in proceeding with the development, approval and implementation of the Land Use Plan.

More specifically, we applaud you and your Planning Committee for pursuing its' work within the objectives of developing a plan which

“...outlines what types of activities should occur, where they should occur and the terms and conditions necessary to guide land use decisions over time. It requires a clear vision of how we want the land and the people to be in 20 or 30 years.”

As a member of the Deh Cho Community, we strongly support this flexible and forward looking approach as it best reflects both the current transition the people of this enormous region of the north are going through and also addresses the dramatic change in needs that has already begun and will intensify over the coming years.

I refer here of course to the transition occurring as the Deh Cho people continue their natural shift from a reliance on the traditional way of life, as a means of sustaining themselves and their culture, to a reliance on the "southern" styled wage based economy and doing so in a manner which not only sustains themselves as a people, but as a culture as well.

This transition will be made easier given the enormous resource potential of this region – allowing them to maintain their land based approach to sustaining themselves as both a people and a culture.

The apparent contradiction lies in the following statements also contained within the Atlas,

"Once approved the land use plan will provide legally binding direction to regulatory agencies and decision-makers in their assessment of development activities, protected area proposals and other land uses."

and,

"All new developments must conform to the land use plan or they will not be approved."

and,

"...the Plan will be revised every 5 years."

In our view this apparent rigidity in Plan implementation will effectively remove the flexibility factor and maintain the current situation of starts and stops or booms and busts in the regions economic development.

If the Deh Cho is to be successful in making its transition from the traditional to the wage based economy (a transition which cannot be stopped – given a combination of high birth rates and the growing exposure of the people to southern lifestyles) it must have sustainable economic growth and hence predictability, on a day to day, month to month and year to year basis (albeit in a balanced manner).

Without this sustainability/predictability factor it will be impossible for the people (on a broad basis) to make an effective transition as very few opportunities will exist to make lasting and Deh Cho based career and skill/business development choices. Many resource based skills require years of continuous training and successful and lasting businesses require high/sustained levels of volume/activity.

It is for this reason we strongly believe a "Land Use" Plan should only be used as a guide by regulators and decision makers – each development or land use must be judged on its own merits, weighing its costs and benefits against needs (from both a company and community standpoint).

This is not to say we are against the creation of protected areas or Parks, but rather we would have problems with any system of land management that automatically excludes future activities from broad geographic areas on a seemingly (from both a community and business needs standpoint) permanent basis without first knowing the specifics of the land use and hence the outcome of any analysis of cost and benefits versus needs.

While there is provision for a review or change to the land use plan every five years, this is not workable for market/price driven industries such as mining where in remote areas such as the Mackenzie Mountains, timing can make or break a project.

One alternative to this rigid approach which is commonly employed, is for the governing authority(s) to establish a system of land use standards and practices, in which companies/individuals are only allowed specific land uses if they can demonstrate the impact of such a land use will not exceed a given level of impact.

With respect to the specific information you sought, I am pleased to provide you with the following feedback;

While the information provided does describe the types of land use that have occurred to date, it does not tell the whole story especially with respect to some of the key underlying dynamics.

For example, **Map 3: Existing Activities and Third Party Interests**, would more accurately be labeled an historic overview depicting, presumably, all permitted land uses within the Deh Cho that have occurred up to the date of publication of the map. What it masks is how little resource development activity, whether at the exploration or production stage, is actually ongoing today.

Put another way, although the amount of activity depicted in this map suggest a lot of work over a very large area over a very long time period, it has resulted in very little production and hence lasting jobs and/or business opportunities for the communities.

This combined with the information on the resource potential for this region suggest industry will continue to need access to a very large area if success is to be achieved in terms of both (economic) discoveries/production and sustainable levels of activity.

From an industry standpoint it would also be highly useful if a recognition and acceptance was given to meeting its transportation needs. Resource finds, whether mineral or oil and gas, require transportation infrastructure or they are worthless.

With respect to our Prairie Creek property for example (or any other future mining project in the Mackenzie Mountains) we cannot operate the mine nor transport the ore without a road.

Similarly, **Map 5: Generalized Density of Traditional Land Use and Occupancy**, masks the transitioning factor (as discussed above) that exist (at an ever increasing rate) in every community.

Somehow this must be incorporated into the planning process as it depicts a very real and rapidly expanding change that is occurring in the Deh Cho communities, resulting in a new and very different set of needs that can only be satisfied by a significant and sustained expansion to the Deh Cho wage based economy.

With respect to the information relative to the nonrenewable resource potential, it is very important that all parties understand that this represents only what is known today, which is not very much given the very low levels of exploration that have occurred.

On the mineral side, one could easily argue that there has never been any significant level of exploration (owing to a combination of remoteness and a lack of transportation (roads) infrastructure) while on the oil and gas side, there has really only been one round of serious exploration (albeit on a small scale relative to what has occurred in the south) that goes back to the 1970's and was for the most part unsuccessful.

With respect to the question of which of the 5 Land Use options adequately represents our interests as a company, it is difficult to say as all 5 seem the same given we have/are entitled to very specific rights for mining, including the right of access (and we are only proposing to convert our existing winter access route to an all weather route) and since we do not wish to use the access route for any other purpose than transportation, we are not sure how any one of the 5 Land Use options presented would affect us any differently than any other.

From a Deh Cho standpoint however, we would hope that every potential developer, from an “opportunity” standpoint, be given the opportunity to present a case for resource development in any of the areas depicted in Option 1 outside of the existing Nahanni National Park Reserve and the proposed Horn Plateau Protected Area.

In a perfect world we would know exactly where the resources were, how much development was needed and that would be the end of it. In the real world however, and especially in the Deh Cho, we do not know where the resources are (other than in a very general sense) and our success rate in finding them has not been good.

This coupled with the very great and expanding needs of the Deh Cho people requires, out of necessity, a high degree of flexibility and caution in adopting any of the 5 options other than Option 1. This does not mean that development should be allowed to occur every where or in any way. What it requires is a transparent process that can judge whether or not the potential negative impacts from a specifically proposed land use in a specific geographic area can be prevented, managed and/or controlled to the point where its benefits outweigh any potential negative impacts.

And in this case a land use plan would play an integral role in defining to the appropriate authority(s) the relative degree of environmental/cultural sensitivity attached to any specific lands where a development is proposed.

To this end, the information you have compiled to date would be invaluable in assisting the appropriate authority(s) in undertaking such an assessment.

Additional rationale for offering this more flexible approach can be seen in the information presented in **Map 7: Summary of Conservation Values**, in which the communities have, except for an area in and around our mineral properties and an area south of the Nahanni National Park Reserve, attached a moderate to very high Conservation Value on the entirety of the Deh Cho Region.

In other words, the communities believe all their lands have a high conservation value (as one would rightly expect from a traditional land based people) – everything requires protection.

If their (future) needs as a people were indeed met today, then the work of the Planning Committee would be much easier to identify where work can proceed and where it cannot.

In this case, however, where their needs, both current and future, cannot be met without a significant and sustained level of economic activity, the choices that must be made become less as to “where” a development may or may not proceed but rather as to “how” a development may proceed.

On behalf of Canadian Zinc Corporation, I thank you for your consideration in these matters and I would welcome any further opportunities to contribute to your planning process.

**Yours truly,**

Alan B. Taylor  
COO & VP Exploration  
CANADIAN ZINC CORPORATION