November 26, 2026

Mark Cliffe-Phillips
Executive Director
Mackenzie Valley Environmental Impact Review Board
PO Box 938, 200 Scotia Centre
5201-50 Avenue, Yellowknife, NT X1A 2N7

Re: Fort Good Hope Metis, Fort Good Hope RRC, and Yamoga Lands Corporation Comments on Mackenzie Valley Highway EA Scoping and Terms of Reference

Included in this submission is our comments on the GNWT's revised Terms of Reference (TOR) for EA1213-02 on the Mackenzie Valley Highway (MVH). Our comments are submitted on behalf of the Fort Good Hope Renewable Resources Council, Fort Good Hope Metis Nation Local #54 Land Corporation, and Yamoga Lands Corporation.

The proposed MVH would require the construction of hundreds of kilometres of new highway through previously undisturbed lands within the K'asho Got'ine District. This is a substantial change from the recent focus of the Environmental Assessment which was for an all-weather highway from Wrigley to Norman Wells that required no new construction or linear disturbance in the K'asho Got'ine District.

The revised TOR is very similar to the previous TOR in length and content. We would like to remind the MVEIRB and GNWT that the application of this revised TOR will require substantial new work to assess the impacts of MVH construction through the K'asho Got'ine District.

We would also like to remind that MVEIRB and GNWT that previous, recent participation by our organizations in the Environmental Assessment has been in the context of a different project that had minimal impacts on the K'asho Got'ine District and that there is substantial outstanding work required by GNWT to collaborate with us to finalize and approve plans for MVH routing and construction through the K'asho Got'ine District.

We view our role in this Environmental Assessment as primarily limited to issues impacting the K'asho Got'ine District, but we also must remind GNWT, the MVEIRB, and other parties to the environmental assessment that the primary decision makers for our District are the Bands, land corporations, and Renewable Resources Councils located within the District itself.

In addition to these general comments we have some specific comments on aspects of the revised TOR that we would like the MVEIRB to consider.

Increased Access to the K'asho Got'ine District

The MVH will increase access to the K'asho Got'ine District and our organizations have an interest in mitigating and avoiding impacts from increased access.

These impacts are related to things like drugs and alcohol more easily being smuggled into Fort Good Hope, increased pressure on policing services in Fort Good Hope, cabin leases on Crown lands within our District, squatters on Crown lands within our District, increased use of our District for hunting and fishing by people who are not Participants to the *Sahtu Dene and Metis Comprehensive Land Claim Agreement*, the creation of new local governments, increased prospecting and mineral exploration, and new major industrial infrastructure like mines and pipelines along with ancillary developments like access roads.

Our initial review of these issues and engagement with the K'ahsho Got'ine Assembly suggests that addressing these impacts may require changes to current governance arrangements with Canada and the GNWT in our District. These arrangements include the *Sahtu Dene and Metis Comprehensive Land Claim Agreement* and existing legislation of the GNWT and Canada.

We note that the revised TOR states that,

- Use of the highway by the public is included in the scope of development,
- Anticipated public, commercial and government use of the highway will be described by the GNWT,
- The GNWT will describe and evaluate the potential impacts of the highway on harvesting
- Local social and economic considerations are a key line of inquiry

We would like to ensure that the concise descriptions in the revised TOR will be interpreted broadly enough by the MVEIRB to allow us to speak about governance arrangements within the K'asho Got'ine District relating to these issues. We will likely have to address whether current governance arrangement in place are sufficient to address the potential impacts and recommend changes to these arrangements if necessary. We don't want the Environmental Assessment to be scoped in a way that prevents us from addressing these issues.

Harvesting Impacts within the Fort Good Hope Group Trapping Area

The revised TOR needs to make it clear that the Environmental Assessment will address harvesting impacts within the Fort Good Hope - Colville Lake Group Trapping Area (the GTA).

The boundary of the GTA is the same as the boundary of the K'asho Got'ine District.

The Current wording of the revised TOR, in section 7.2.2., says that the GNWT will describe and evaluate the potential impacts of "changes in hunting and fishing pressures from people who do not reside in the communities along the route".

We are concerned that "the route" includes communities from Wrigley to the Dempster Highway, and currently people from many of these communities do not have access to the GTA and do not harvest there.

The revised TOR needs to specifically require the GNWT to describe and evaluate changes in hunting and fishing pressures within the Fort Good Hope – Colville Lake Group Trapping Area by people who are not Participants to the *Sahtu Dene and Metis Comprehensive Land Claim Agreement*.

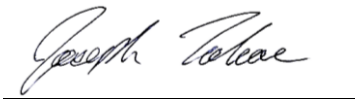
Sincerely,



President Tommy Kakfwi
Fort Good Hope Renewable Resources Council



President Aurora McNeely
Fort Good Hope Metis Nation Local #54 Land Corporation



President Joseph Tobac
Yamoga Lands Corporation