



7th Floor - 4922 48th Street
PO Box 2130, Yellowknife NT X1A 2P6

Tel: 867-669-0506 Fax: 867-873-6610
www.mvlwb.com

May 29, 2025

File: MV2025C0004

Mark Cliffe-Phillips
Mackenzie Valley Review Board
200 Scotia Centre
Box 938, 5102-50th Avenue
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

Re: Fireweed Metals Corp. – Notice of Preliminary Screening Determination – Application for Land Use Permit– Mineral Exploration – Mactung NWT Field Investigations Project, Mackenzie Mountains, NT

The Mackenzie Valley Land and Water Board (Board) met on May 27, 2025, and considered the Application Package from Fireweed Metals Corp (Fireweed) for Land Use Permit (Permit) MV2025C0004 for the Mactung NWT Field Investigations Project (Project) in accordance with the *Mackenzie Valley Resource Management Act (MVRMA)*.

The Board conducted a preliminary screening based on the public record for the proceeding. Based on the evidence provided, the Board is satisfied the screening has been completed according to section 125 of the MVRMA and has decided **not to refer** the Project to environmental assessment. The Board's Preliminary Screening Determination and Reasons for Decision, as required by section 121 of the MVRMA, are attached.

If the Board does not receive notice of referral to environmental assessment, it can proceed with issuance of Permit MV2025C0004 on Monday June 9, 2025.

The Board and staff look forward to continued communications throughout the pause period. Please contact Kathy Racher via [email](#) or at (867) 766-7457 with any questions or concerns regarding this letter.

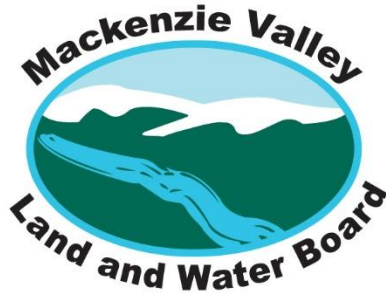
Yours sincerely,



Tanya MacIntosh
Chair, Mackenzie Valley Land and Water Board

BCC'd to: SLWB – Tulit'a District
SLWB – K'ahsho Got'ine District
MVLWB – Dehcho
Ian Ponsford – Fireweed Metals Corp.
Shae Dalphond – Fireweed Metals Corp.
Katsky Venter – RainCoast Environmental Services Ltd.

Attached: Preliminary Screening Determination and Reasons for Decision



7th Floor - 4922 48th Street
 PO Box 2130, Yellowknife NT X1A 2P6

Tel: 867-669-0506 Fax: 867-873-6610
 www.mvlwb.com

Preliminary Screening Determination and Reasons for Decision

Land Use Permit Application	
File Number	MV2025C0004
Company	Fireweed Metals Corp.
Project	Mactung NWT Field Investigations Project
Location	Mackenzie Mountains, NT
Activity	Mineral Exploration
Date of Decision	May 27, 2025

1.0 Decision

In accordance with subsection 124(1) of the [Mackenzie Valley Resource Management Act](#) (MVRMA), the Mackenzie Valley Land and Water Board (MVLWB or Board) met on May 27, 2025, to make a preliminary screening determination on the Application from Fireweed Metals Corp. (Fireweed)(Applicant) for Land Use Permit MV2025C0004 (Permit)¹ for the Mactung NWT Field Investigations Project in the Mackenzie Mountains, Northwest Territories (Project).²

The Board has decided not to refer the proposed Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment because, based on the evidence, it is the Board’s opinion that the proposed Project will not have a significant adverse impact on the environment or be a cause of public concern.

¹See MVLWB Online Registry www.mvlwb.com for [Fireweed – Mactung – Permit Application – Mar21 25](#).

² The Project is the Mactung NWT Field Investigations Project, which is the proposed development, where “development” is defined in Part 5 of the [MVRMA](#) as:
 “any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

The Board’s determinations, including reasons for its decisions, are detailed in sections 5.0 and 6.0

2.0 List of Defined Terms and Acronyms

Applicant	Fireweed Metals Corp.
Application	The complete application package submitted by the Applicant for Land Use Permit MV2025C0004
Board	Mackenzie Valley Land and Water Board
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
CIRNAC-CARD	Crown-Indigenous Relations and Northern Affairs Canada - Contaminants and Remediation Division
CRP	Closure and Reclamation Plan
DCFN	Dehcho First Nations
DFO	Department of Fisheries and Oceans Canada
DGG	Délı̄nę Got’ine Government
EA/EIR	Environmental Assessment/Environmental Impact Review
ECCC	Environment and Climate Change Canada
FNNND	First Nation of Na-Cho Nyäk Dun
GLWB or Board	Gwich’in Land and Water Board
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories – Environment and Climate Change
GNWT-ECE-PWNHC	Government of the Northwest Territories – Education, Culture, and Employment - Prince of Wales Northern Heritage Centre
HRWMMP	Heritage Resources and Wildlife Management and Monitoring Plan
IR	Information Request
Inspector	An Inspector designated under subsection 84(1) of the Mackenzie Valley Resource Management Act
LKFN	Łı́ı́ııı Kúé First Nation (Ft Simpson)
LWBs	Land and Water Boards of the Mackenzie Valley
MVLWB or Board	Mackenzie Valley Land and Water Board
MVRMA	Mackenzie Valley Resource Management Act
Minister	Minister of Northern and Arctic Affairs, OR Minister of the Government of the Northwest Territories – Environment and Climate Change, as the case may be
NWT	Northwest Territories
NWTMN	Northwest Territory Métis Nation
OHWM	Ordinary High-Water Mark
ORS	Online Review System (https://new.onlinereviewsystem.ca/)
Party	As per the LWB Rules of Procedure , an applicant, a person, or an organization participating in the regulatory proceeding for the Application.
Permit	Land Use Permit MV2025C0004
Project	Mactung NWT Field Investigations Project
RC	Reverse Circulation
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
SLUP	Sahtú Land Use Plan

SLWB or Board	Sahtú Land and Water Board
Standard Permit Conditions	LWB Standard Land Use Permit Conditions Template
TDLC	Tulit'a District Land Corporation
TK	Traditional Knowledge
WMP	Waste Management Plan
YESAB	Yukon Environmental and Socio-economic Assessment Act

3.0 **Background**

On March 21, 2025, the Applicant submitted an application for a new permit (S25C005) to the Sahtú Land and Water Board (SLWB or Board). On April 17, 2025, the Mackenzie Valley Land and Water Board met and determined that this file is transboundary and would be processed by the Mackenzie Valley Land and Water Board under Permit Application MV2025C0004 (the Application).³ The Application is for a Type A Land Use Permit to conduct field investigations (drill based baseline studies and potentially limited exploration), establish a temporary tent-based camp, and repair, maintain, and use the existing Mactung Spur Road as part of the NWT-based Mactung NWT Field Investigations Project. These activities exceed permitting criteria but do not exceed water licensing criteria.

In the NWT, the Project activities occur within the Tulit'a District of the Sahtú Dene and Métis Settlement Area. The Project also falls within the asserted territories of the Kaska Dena, First Nation of Na-Cho Nyäk Dun, and Dehcho.

The Project and associated activities overlap both territorial and federal land in the NWT, with federal land being a 60 m wide corridor associated with the North Canol Road and initial portion of the Mactung Spur Road (the Crown-Indigenous Relations and Northern Affairs Canada "CIRNAC-CARD Canol Road") (see Figure 1). The area outside of the Mactung leases and the existing road corridors is Sahtú Settlement Land, including a short (~120m) segment of the existing Mactung Spur Road. The Project is within Special Management Zone (SMZ) 38 (Mackenzie Mountains) and is approximately 10 km from the Doi T'oh Territorial Park and Canol Heritage Trail Reserve Proposed Conservation Initiative and 130 km north-northwest of the Nááts'ihch'oh National Park Reserve. The SMZ 38 summary in the SLUP states, "A number of mineral deposits have been identified in the Mackenzie Mountains. The SMZ will allow for the exploration and development of these and other mineral deposits."

4.0 **Scope of Screening**

In accordance with paragraph 125(1)(a) of the [MVRMA](#), the Board must conduct a preliminary screening of the proposed Project to determine and report to the Review Board whether, in its opinion, the proposed Project might have a significant adverse impact on the environment or might be a cause of public concern.

³ See MVLWB Online Registry for [Fireweed – Notification – Timeline Pause – Apr25 25](#).

The Application is for Fireweed’s Northwest Territories (NWT) mineral leases and surrounding areas; however, the proposed activities are part of a larger tungsten mineral development project – the Mactung Project - located in the Mackenzie Mountains spanning the border between the Yukon and the Northwest Territories.

As noted by the Applicant and the First Nation of Na-Cho Nyäk Dun (FNNND), approvals have occurred in the Yukon in relation to the Mactung Project, including an assessment by the Yukon Environmental and Socio-economic Assessment Board (YESAB) and a land use approval from the Yukon Government^{4,5,6}. The activities considered in those decisions are similar to the proposed activities for the Mactung NWT Field Investigations Project.

On November 13, 2019, YESAB issued the Decision Document for the Mactung Project – Class 4 Exploration for the Government of the Northwest Territories.⁷ The assessment outcome was that environmental and socio-economic effects in or outside Yukon can be mitigated by recommended terms and conditions listed in the Decision Document.

On October 2, 2024, the Yukon Government – Department of Energy, Mines and Resources approved the Class 4 Quartz Mining Land Use Approval (LQ00521), which expires January 15, 2030.⁸

For the purposes of permitting, the Board only has the jurisdiction to permit activities in the NWT, however, for the purposes of this screening, the Board has considered the Mactung Project as a whole. The portion of the Mactung Project activities that are located in the Yukon have already undergone an environmental assessment by YESAB, and the Board has determined that the activities in the Yukon do not require any further screening.

The details of the Board’s analysis are set out in section [5.0](#) and 6.0 below.

⁴ See MVLWB Online Registry for [Fireweed – Mactung – FNNND comments on application – May21 25.](#)

⁵ See MVLWB Online Registry for [FNNND and Fireweed Reviewer Comments and Responses – May23 25.](#)

⁶ See MVLWB Online Registry for [Fireweed -Mactung – Land Use Permit Application – Engagement Record – Mar21 25.](#)

⁷ See YESAB [Project No.2018-0211 Designated Office Evaluation Report – Jul5 19.](#)

⁸ See Yukon Government File No. LQ00521b for [Fireweed – Class 4 Quartz Mining Land Use Approval – Oct2 24.](#)

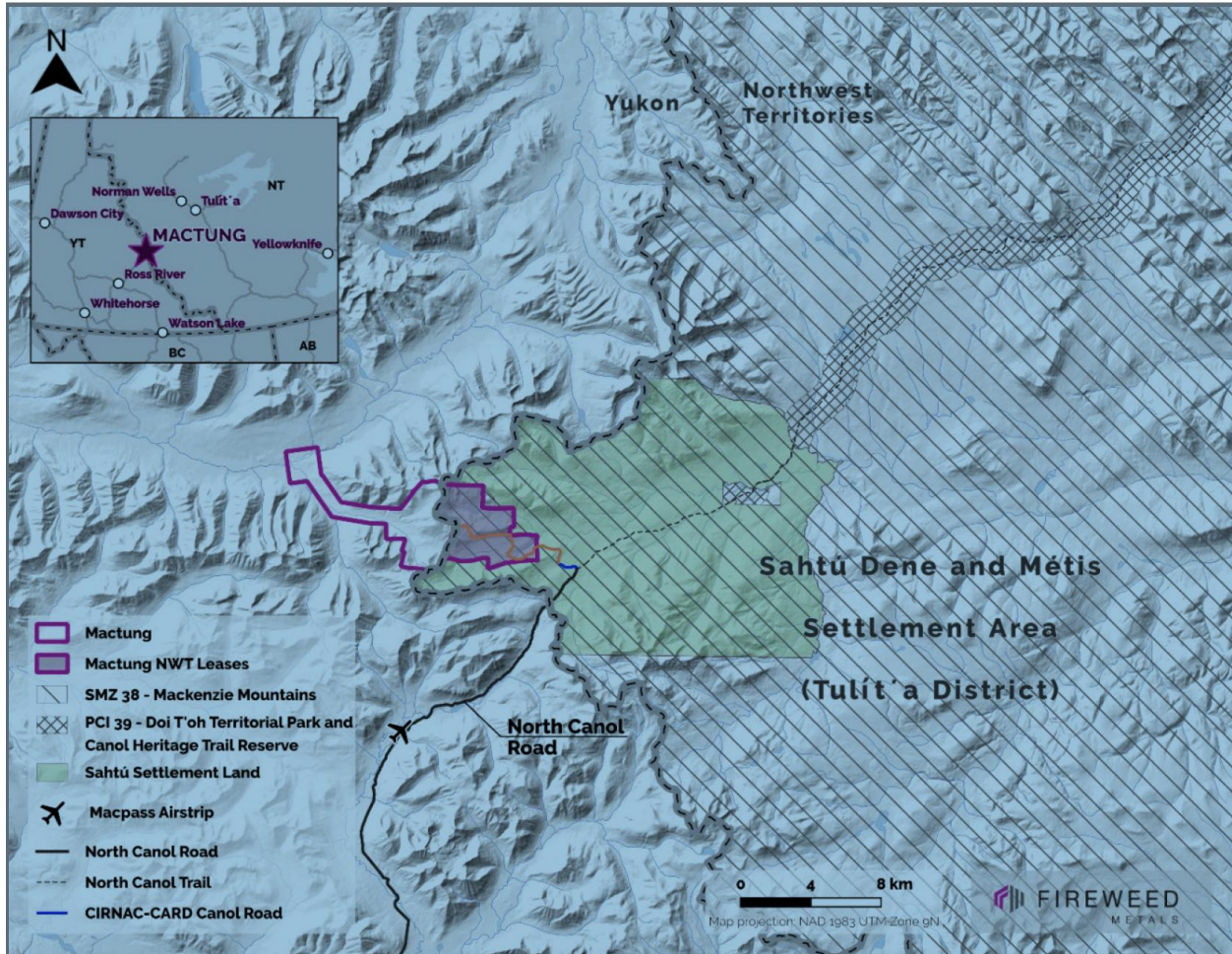


Figure 1. Mactung Project Location

4.1 Spatial Extent of Screening

The geographic extent of the area included in the preliminary screening is identified in Figures 1-3. The spatial boundaries include the various mineral interests and travel route used to access the site(s), including the North Canol Road and Trail, the CIRNAC-CARD Canol Road, and the existing Mactung Spur Road (Figure 2). The Mactung Project is accessible from Ross River (YK) via the North Canol Road and Mactung Spur Road, or via the nearby Macpass airstrip (YK) or by helicopter.

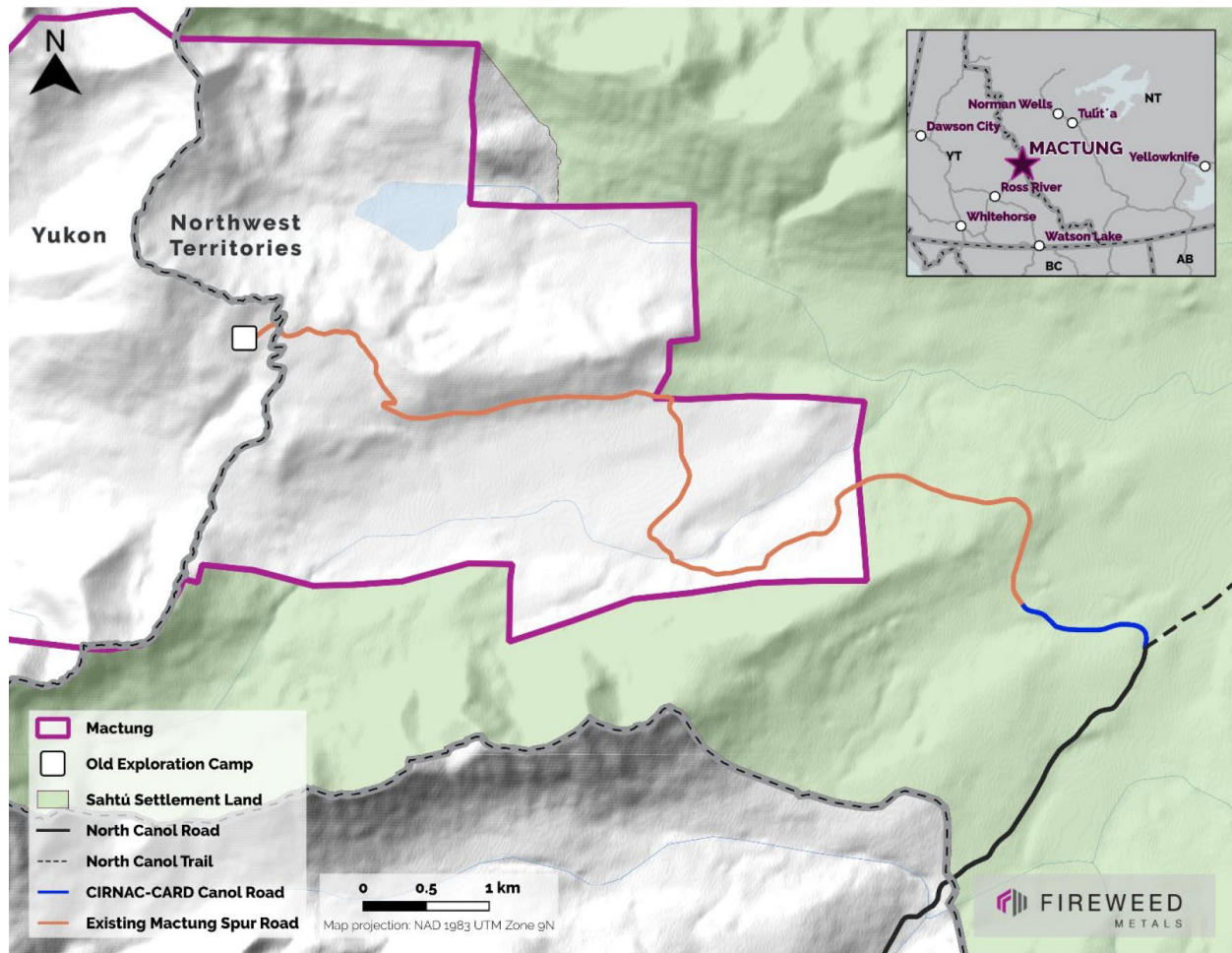


Figure 2. Mactung NWT Field Investigations Project Location including lease area(s) and roads.

4.2 Temporal Component of Preliminary Screening

Year-round work was considered in the preliminary screening. The Applicant indicated exploration activities will be undertaken seasonally, typically between June and September, but potentially any time of year. Fireweed will avoid helicopter-based disturbance during peak wildlife sensitivity periods, such as caribou calving, whenever possible. When it is not in use, the camp will be seasonally closed.

4.3 Activities Included in Preliminary Screening

The following activities were included in the preliminary screening:

- Road repair, maintenance, and use;
- Baseline and exploration field investigations, including drilling;
- Establishment and use of a temporary tent-based camp;
- Seasonal and temporary closures; and
- Closure and reclamation activities.

4.3.1 Road Repair, Maintenance, and Use

The Mactung Spur Road is an 11 km road that connects the North Canol Road with Fireweed's NWT and Yukon-based Mactung claims. This road has been a public road since at least the 1980s, used by various users of the area, and needed by Fireweed to access their Yukon-based claims and support exploration activities and field studies. Repair and maintenance of this road is required to allow continued safe and environmentally responsible use.

Repair and maintenance activities proposed are to include:

- Clearing of small, localized landslides which have partially obstructed the road (and any others which may occur over time).
- Road stabilization where/if needed.
- Installation of slide mitigation measures such as roadside barricades to prevent debris from spilling onto the road from small sloughing events.
- Convert the creek crossing at Dale Creek to a temporary clear span crossing by installing a single lane Bailey bridge (or similar) over a narrow section of the creek near the current ford location (see Figure 3).
- Construct the bridge at Dale Creek entirely outside of the Ordinary High-Water Mark (OHWM) and at a location where the creek is <5 m wide.
- If needed, French drains or small culverts may be added as needed along the road to allow water drainage at this Dale Creek location.
- Segments of the road would be realigned where needed, including to access a suitable Dale Creek crossing location and potentially to avoid overlap with Sahtú Settlement Land (SSL), if necessary.
- General road maintenance and grading will also be required as well as possible snow clearing along with seasonal use.



Figure 3. Aerial view of Mactung Spur Road's proposed crossing of Dale Creek.

4.3.2 *Baseline and Exploration Field Investigations, including Drilling*

- Studies may include collection of data on air quality, climate and meteorology, light and noise levels, surface and groundwater quantity and quality, as well as ground geochemical, geotechnical, and permafrost conditions.
- Studies will include collecting baseline information on fish, fish habitat, and aquatic life, soils, vegetation, and terrain, birds and wildlife, archaeology, Indigenous Knowledge, land and resource use.
- Aerial or ground-based exploration surveys and sampling and environmental monitoring.
- Drills will be required to collect data on geotechnical and permafrost conditions, hydrogeology, geochemistry and/or geometallurgy.
- Drills may also be used for exploration drilling. Typically diamond drills would be used for these activities, although reverse circulation (RC) or other similar or smaller drill types may be used as well.

4.3.3 *Establishment and Use of a Tent-Based Camp*

Information about the establishment and use of a tent-based camp:

- Located on Fireweed's NWT-based Mactung mineral leases along, or close to, the existing Mactung Spur Road, likely near Dale Creek. Note, the exact location will be selected in the field based on ground conditions (flat, dry, durable ground) in a location that minimizes disturbance (e.g. close to existing road and preferably in an already used, developed, or cleared area).
- A tent-based camp capable of supporting up to 49 people seasonally.
- Temporary structures for accommodations, food preparation, dining, office space, maintenance, storage and washrooms, pump house, and generators.
- Equipment associated with the project activities.
- Camp greywater will be discharged to small sumps.
- If pit toilets (outhouses) are used, they will be backfilled on cessation of pit use.
- Drill waste will be discharged to nearby natural depressions or dug sumps which would be filled on completion of the drill hole.
- Other suitable waste may be incinerated or open burned (the latter only being applicable to paper, cardboard or untreated wood).
- All other waste will be backhauled to an approved waste management facility.
- No landfill or landfarm is proposed.
- A fuel cache with capacity for up to 320 barrels of diesel, 50 barrels of aviation fuel, 10 barrels of gasoline, as well as smaller quantities of propane and lubricants.
- Remote fuel caches may be established to support remote drilling.
- Water use from Dale Creek and Cirque Lake to remain under Type B Water Licence thresholds.

4.3.4 *Seasonal and Temporary Closures*

The following activities will occur prior to seasonal or temporary closures:

- Removing or reducing wildlife attractants, including wastes and food.
- Removing or securing structures (e.g. boarding over doors and windows).
- Storing any remaining wildlife attractants in a secure location/containment.
- Skirting structures, where needed.
- Removing loose cables or ropes.
- Documenting and securing any fuel and chemical stores.

4.3.5 *Closure and reclamation activities*

The following activities will occur for closure and reclamation:

- The removal of all structures, temporary buildings, machinery, equipment, materials, fuel drums and other storage containers and any other items used.

- The cleanup of any remaining spills or contaminated materials (if any).
- The backfilling of any dug sumps.
- Stabilize any areas of potential erosion or sedimentation.
- The removal of the bridge crossing and any rip rap material used.
- Progressive reclamation will occur as the project progresses, which will also include drill site reclamation.

5.0 **Public Record and Regulatory Proceeding**

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Application and a draft Permit for public review on March 31, 2025, under the SLWB file S25C-005 and again on April 22, 2025, under the MVLWB file MV2025C0004, following the transboundary determination and timeline pause⁹. The application posting invited reviewers to provide comments and recommendations on the Application and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due May 6, 2025, with responses from the Applicant due May 13, 2025. Comments and recommendations were received from the following parties:¹⁰

- Łíídlııı Kúé First Nation (LKFN);
- Government of the Northwest Territories - Prince of Wales Northern Heritage Centre (GNWT-ECC-PWNHC);
- Tulit'a District Land Corporation (TDLC);
- Fisheries and Oceans Canada (DFO);
- Government of the Northwest Territories – Environment and Climate Change (GNWT-ECC);
- Environment and Climate Change Canada (ECCC); and
- Crown-Indigenous Relations and Northern Affairs Canada / Contaminants and Remediation Division (CIRNAC-CARD).

A week following the response deadline, a request from the First Nation of Na-Cho Nyäk Dun (FNNND) was received on May 13, 2025, indicating their desire to comment on the application. An extension was granted for them to respond by May 21, 2025, with Fireweed to reply by May 23, 2025, to give enough time for review before the planned Board meeting on May 27, 2025. The FNNND comments and Fireweed responses were received.^{11,12}

The Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the [MVRMA](#).

⁹ See MVLWB Online Registry for [Fireweed – Notification – Timeline Pause – Apr25 25](#).

¹⁰ See MVLWB Online Registry for [Fireweed – Mactung – Reviewer Comments and Responses Summary Table – May13 25](#).

¹¹ See MVLWB Online Registry for [First Nation of Na-Cho Nyäk Dun \(FNNND\) Comment Letter – May21 25](#).

¹² See MVLWB Online Registry for [FNNND and Fireweed Reviewer Comments and Responses – May23 25](#).

Pursuant to Schedule 4.1 of [Northwest Territory Métis Nation \(NWTMN\) Interim Measures Agreement](#),¹³ the Board determined that written notice was given to the NWTMN and that a reasonable period of time was allowed for NWTMN to make representations with respect to the Application.

Pursuant to section 27, paragraphs (a) and (b) of the [Dehcho First Nations \(DCFN\) Interim Measures Agreement](#),¹⁴ the Board has determined that written notice was given to the DCFN, and that a reasonable period of time was allowed for DCFN to make representations with respect to the Application.

The Board is also satisfied that notice of the Application was provided to the Délı̄nę Got'ı̄ne Government (DGG) and that a reasonable period of time was provided for the DGG to make representations to the Board in accordance with section 63 of the [MVRMA](#).

6.0 Potential Impacts and Proposed Mitigations

Table 1 below summarizes:

- the potential impacts of the proposed Project;
- the concerns that were identified during the regulatory proceeding and how the Applicant addressed those concerns;
- the proposed and potential mitigations for the potential impacts; and
- the Board's analysis of the potential impacts and proposed mitigations.

¹³ See MVLWB Land Claims, IMAs, and Land Use Plans webpage to access the [Northwest Territory Métis Nation Interim Measures Agreement](#).

¹⁴ See MVLWB Land Claims, IMAs, and Land Use Plans webpage to access the [Dehcho First Nations Interim Measures Agreement](#).

Table 1: Potential Impacts and Proposed Mitigations for the Proposed Project

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
Habitat and/or sensitive feature potential effects	Direct impacts on habitat related to Project footprint	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Selecting a camp location near the existing road to minimize disturbance and footprint. 2. Establishment of a camp on dry, durable ground to minimize ground impacts and potential for erosion. 3. Placement of heated structures (e.g. sleeper tents) on cribbing (i.e., raised above ground) to minimize vegetation impacts and prevent permafrost degradation if present. 4. No overland off-road transit by vehicles when there is risk of rutting or gouging of the ground. 5. Minimizing the length and width of any over-land winter transit corridors. 6. Use of natural depressions or dug sumps to deposit appropriate waste (e.g., greywater, pit toilet waste, drill cuttings). 7. Filling and recontouring any dug sumps or drill holes created on cessation of use where necessary to avoid ponding of water. 8. Avoiding use of salt during drilling. 9. Prevent introduction of non-native vegetation by only using locally appropriate species if/when re-vegetating areas. 10. No brush clearing within 100 m of a waterbody unless associated with a trail crossing or for drill pad construction, when authorized by an Inspector. 11. Leaving roots where possible during any brush clearing to assist in soil stabilization. 12. Use of silt fencing or other suitable measures if any risk of surface water runoff to waterbodies. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		13. No camps, sumps, or fuel storage within 100m of a waterbody except with Inspector approval. 14. Training of all staff on the importance and need to minimize Project footprint and Project impacts to wildlife habitat. 15. Progressive closure of drill sites upon completion of operations at each Borehole. 16. At closure, removal of all structures, equipment, chemicals, and other materials and ensure land is returned to a stable state suited to future uses.	
Potential disturbance of wildlife dens and bird nests	Impact on wildlife dens and bird nests related to Project footprint	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Minimizing brush clearing activity and avoiding clearing during nesting periods where practical. 2. Avoid disturbing or destroying any active nests containing eggs or young. 3. If nests are found, establishing a suitable buffer zone (based on regulatory guidance) until all young have fledged. 4. Avoiding identified active carnivore dens and following SLUP setbacks. 5. Skirting camp tents, removing structures seasonally, or otherwise deterring wildlife denning. 6. Implementing the wildlife setbacks and sensitivity windows outlined in Table 4 of the Sahtú Land Use Plan to the extent feasible. 7. Conducting inspections to confirm that setbacks from known active nest or den sites are being maintained. 	Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern. <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant's commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Potential attraction of wildlife by	On-site storage and use of food and food waste and other	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. A strict 'no feeding of wildlife' policy. 	Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
attractants such as food waste	potential wildlife attractants	<ol style="list-style-type: none"> 2. All waste will be contained and managed in an organized and appropriate manner as outlined in the Waste Management Plan. 3. All food waste and wildlife attractants will be stored in a manner resistant to wildlife access, and which minimizes odours. 4. All personnel will be required to return any food scraps and associated wastes to the camp for appropriate management. 5. Wastes attractive to wildlife will be disposed of promptly, either by backhaul to an approved waste management facility, or in an onsite incinerator (if available and as suitable); if temporary storage is required, wastes attractive to wildlife will be double bagged and placed in a secure structure to restrict odours from escaping and minimize attraction of wildlife and to prevent wildlife access. 6. No landfill will be established on site; these have the potential to attract wildlife. 7. Kitchen wastewater will be screened to remove food particles prior to discharge and the greywater sump will be inspected regularly to remove any food waste and will be treated as needed with lime or crystal lye to prevent being an attractant. 8. An electric bear fence may be erected if deemed necessary. 9. All staff will be trained on Project waste management practices aimed at minimizing wildlife attraction and conflict. 10. Work areas will be inspected regularly when in use to confirm that wildlife attractants are being appropriately managed and food waste is returned to the camp on a daily basis. 	<p>adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant's commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Potential spills	Storage and use of hazardous and potentially hazardous materials	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. A Spill Contingency Plan will be implemented. 	Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant adverse impact on the environment or be

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<ol style="list-style-type: none"> 2. Fuels, sumps, and chemical caches will be located at least 100 m away from the Ordinary High Water Mark (OHWM) of any waterbody or watercourse. 3. Bulk fuel containers will be designed, or supplied, with 110% containment. 4. Fuel storage areas will be inspected routinely when activity is underway for leaks or damage. 5. Portable drip trays and appropriately sized fuel transfer hoses with pumps will be used when refueling to avoid any leaks or drips. 6. Spill pads will be placed under equipment when stationary for extended periods. 7. Spill response supplies will be located wherever fuel is stored. 8. Regular maintenance and oil checks of all motorized equipment will be undertaken to avoid preventable leaks. 9. All chemical substances, including fuel, will be appropriately labelled and Safety Data Sheets will be maintained in an accessible location on site. 10. Greywater and cuttings water will be piped to a sump at least 100 m away from the closest Ordinary High Water Mark (and further away whenever practical). 11. Camp sumps will always maintain freeboard and will be inspected regularly for leaks or overflow. 12. All work areas will be inspected regularly when in use to check for spills. 13. All personnel will be trained in basic spill prevention and spill response procedures as well as available spill response materials and their use; spill-response exercises will be conducted. 14. Spills will be cleaned up promptly and in full at the time of occurrence. 	<p>a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant's commitments and conditions of the Permit are sufficient to mitigate potential impacts.

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<p>15. If clean-up is delayed, measures will be implemented as needed to minimize environmental risk and protect any nearby waterbodies.</p> <p>16. Any contaminated material will be stored in a manner to prevent contaminants from being released to the environment.</p> <p>17. Hazardous and potentially hazardous wastes will be backhauled for disposal at an appropriate facility on next available transit to minimize storage of hazardous materials on site.</p> <p>18. At Project closure, all equipment, fuel, and hazardous and potentially hazardous waste or contaminated soil will be removed in full.</p>	
Potential direct wildlife impacts	Human-wildlife conflict and wildlife injury or mortality caused by Project activities or personnel	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Implementation of Fireweed’s No Hunting & Fishing Policy for Project staff. 2. Training staff in bear awareness and deterrence. 3. Equipping field crews with bear deterrence kits which include: air horns or whistle, bear bangers, and bear spray (and training in their use). 4. Where necessary, using electric bear fences. 5. Where appropriate, making use of wildlife monitors. 6. Wildlife will not be intentionally approached by Project staff and setback distances outlined in Table 4 of the Sahtú Land Use Plan will be implemented to the extent feasible. 7. Personnel will undergo orientation and training on project policies related to wildlife feeding, fishing and hunting, as well as site/ activity specific training on managing wildlife access and waste. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<ol style="list-style-type: none"> 8. Work areas will be inspected regularly when in use for evidence of wildlife access or initiation of nesting. 9. Where practical, chemicals that could be harmful will be substituted for others, particularly if they are also a wildlife attractant (e.g., propylene glycol will be used in substitution for ethylene glycol). 	
Potential helicopter and activity-related disturbance	Use of helicopters	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Helicopter use will be minimized; activities will mostly be conducted using all-weather roads whenever possible. 2. Species-specific wildlife setbacks as outlined in Table 4 of the Sahtú Land Use Plan will be implemented for species that may be present in the area, where feasible. 3. Aircraft will follow flight heights outlined in the Sahtú Land Use Plan based on wildlife presence, except when activities require otherwise (e.g., for takeoff/landing, when conducting altitude-specific aerial surveys, and where required for safety). 4. Field crews will conduct a scan for wildlife prior to initiating activities/landing; if caribou, sheep, or bears are within 500 m or species-specific setbacks cannot be reliably maintained, the crew will be deployed in a different location. 5. Helicopters will avoid landing in areas where wildlife are present where feasible. 6. Helicopters will avoid hovering over wildlife when spotted. 7. Preferred site access flight routes will be used where possible to minimize disturbance of wildlife such as Dall sheep and caribou. 8. Noise will be limited to the extent practical through minimization of idling, unnecessary flights, and appropriate maintenance of equipment, including mufflers. 	<p>Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant's commitments and conditions of the Permit are sufficient to mitigate potential impacts.

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		9. Government of the Northwest Territories regulations regarding wildlife harassment will be followed. 10. To the extent practical, activities will be conducted outside key wildlife sensitivity periods and areas, such as caribou calving, and constraint activities to road corridors.	
Potential effects on water volume or fish habitat	Withdrawal of water from a waterbody for Project use	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Minimizing water use to the extent practical and not using more than 99 cubic meters of water on any given day (typically using much less than this will be used on average). 2. Ensuring water withdrawal aligns with DFO and Land and Water Board guidance for the protection of fish and fish habitat, such as limiting water withdrawal to <10% of instantaneous flow or under ice water withdrawal to <10% of available water volume. 3. Using water pumps with flow rates below 0.150 m³/s to reduce the potential for fish entrainment or impingement. 4. Equipping all water uptake lines with screens designed to prevent the impingement or entrainment of fish as outlined in DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater. 5. Following DFO's protective measures for fish and fish habitat and standard codes of practice and respect the NWT in-water works restricted activity timing windows to the extent feasible. 6. Prioritizing conversion of the current Dale Creek crossing from a ford crossing to a temporary single-lane clear span bridge (e.g. a Bailey bridge) with no in-water footprint and at a location where the creek is <5 m wide. 7. Following DFO's Interim code of practice: temporary stream crossings 	<p>Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant's commitments and conditions of the Permit are sufficient to mitigate potential impacts.

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<ol style="list-style-type: none"> 8. Limiting any fording of Dale Creek (prior to installation of the clear span bridge) to a one-time crossing (over and back) in flowing waters, or a seasonally dry streambed ford. 9. Where needed, seeking guidance and input from DFO through the Request for Review Process. 	
Potential change to, or loss of, cultural integrity, loss of heritage resources	Direct disturbance of archaeological sites related to Project footprint	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Gathering information on the presence of known archaeological sites and/or ice patches from the PWNHC and adhering to applicable buffer distances. 2. Conducting an Archaeological Overview Assessment of areas of planned activity. 3. Preferentially conducting activities in areas of Low Archaeological Potential. 4. Conducting an Archaeological Impact Assessment prior to conducting activities in areas not determined to be of low archaeological potential. 5. Educating Project staff on Fireweed’s Chance Find Protocol, including identification of potential archaeological resources and avoidance and notification procedures. 6. If archaeological sites are discovered, adhere to any buffer distances prescribed by the PWNHC. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Potential decrease in air quality and contribution to climate change	Fossil fuel combustion and burning or incineration and waste	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Emissions related to the combustion of fuel will be discontinuous, short term, and localized. 2. Minimizing helicopter use and equipment run times. 3. Minimize vehicle idling. 4. Carrying out preventive maintenance on equipment. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<ol style="list-style-type: none"> 5. Consolidating materials and waste and coordinating movements to reduce trips. 6. The incinerator will only be used to burn acceptable combustible materials and manufacturer recommendations will be followed. 7. Only untreated wood, paper, and cardboard will be open burnt. 	<p>be discrete and progressively reclaimed.</p> <ul style="list-style-type: none"> • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Increase in noise	Operation of equipment, generators, and aircraft	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Minimizing or avoiding helicopter use. 2. Minimizing idling. 3. Establishing preferred flight paths that reduce disturbance of sensitive areas where appropriate. 4. Conducting routine maintenance of equipment. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Change in social and economic well-being	Project activities, purchasing, and employment	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Preferential hiring of local Indigenous staff with potential job opportunities in roles such as field assistant, archaeological support, laborer, cleaning, food preparation, geotechnical work on core, camp maintenance and set up, and wildlife monitoring. 2. Job benefits may include on-the-job training and skill development such as technical training for core cutting, food preparation, 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<p>geotechnical work on core, camp maintenance and set up, drilling and drill helpers, and field technician roles.</p> <ol style="list-style-type: none"> 3. Goods and services will be preferentially sourced from local communities. 4. Support of community initiatives where requested and financially feasible. 	<p>reclaimed.</p> <ul style="list-style-type: none"> • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Change in social and economic well-being; risk of violence and increased vulnerability against Indigenous women, girls, and LGBTQ2+ individuals	Transient Workforce	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the response period: <ol style="list-style-type: none"> 1. Fireweed has policies and requirements regarding personal safety, bullying, harassment, and violence prevention measures. Fireweed will provide orientation for all employees and contractors. 2. Fireweed agrees to provide education on violence against Indigenous women and girls. Mactung will be a fly-in/fly-out camp and all site personnel arriving and departing site will be documented. 3. Fireweed implements an Employee Assistance Program, enabling anonymous telephone-based counselling services for employees and contractor employees. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The camp will not be accessible to the public. • The Applicant’s commitments are sufficient to mitigate potential impacts.
Impacts of Improper Project Closure	To ensure the project is closed responsibly and long- term effects are not incurred, the following measures will be implemented:	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Developing a closure plan (see Project Description) outlining closure goals and requirements, including but not limited to the following: <ol style="list-style-type: none"> a. Removing all structures, equipment, chemicals, and materials on closure. 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<ul style="list-style-type: none"> b. Recontouring the ground, where necessary, to reflect the surrounding landscape features and mitigate potential erosion. c. Leaving the land in a state which supports future uses. 	<p>reclaimed.</p> <ul style="list-style-type: none"> • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.
Those above	Those above	<ul style="list-style-type: none"> • The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions notably include: <ul style="list-style-type: none"> - CAMP SETBACK - SUMP SETBACK - USE APPROVED EQUIPMENT - FIRE-FIGHTING EQUIPMENT - EXCAVATED MATERIAL TEST PITS - CLEAN WORK AREA - PERMAFROST PROTECTION - REPAIR EROSION - PROGRESSIVE EROSION CONTROL - PREVENTION OF RUTTING - CHEMICALS - DRILLING WASTE - HABITAT DAMAGE - ARCHAEOLOGICAL BUFFER - SITE DISTURBANCE - SITE DISCOVERY AND NOTIFICATION - ARCHAEOLOGICAL OVERVIEW - AIA – HIGH POTENTIAL - FUEL STORAGE SETBACK - SPILL CONTINGENCY PLAN 	<p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <ul style="list-style-type: none"> • The areas impacted are anticipated to be discrete and progressively reclaimed. • Impacts are temporary. • The Applicant’s commitments and conditions of the Permit are sufficient to mitigate potential impacts.

Potential Impact	Activity	Proposed Mitigations Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.	Board Analysis and Determination
		<ul style="list-style-type: none"> - WASTE MANAGEMENT PLAN - CLOSURE AND RECLAMATION PLAN 	

6.1 Consideration of Potential Impacts

Based on the potential impacts and proposed mitigations identified above in Table 1, the Board considered whether the Project might have a significant adverse impact on the environment. In general, impacts of the Project on the environment can be mitigated through the use of standard permit conditions and/or project-specific conditions established by the Board as per the Land and Water Boards (LWB) [Standard Process for Creating New Conditions](#). These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

A draft Permit was circulated for review during the regulatory proceeding, and all Parties were given the opportunity to provide comments and recommendations on the draft conditions. In finalizing the conditions, the Board will consider all of the evidence provided through the regulatory proceeding.

6.2 Consideration of Public Concern

In addition to considering the potential impacts of the Project, the Board considered whether the Project might be a cause of public concern. Letters were submitted from Łíídlı́ Kúé First Nation (LKFN) and the First Nation of Na-Cho Nyäk Dun (FNNND) outlining concerns with the proposed Project. Based on the comments received from LKFN and FNNND, and the responses from Fireweed, the Board has determined that the LKFN and FNNND's concerns will be adequately addressed by Fireweed's commitments and the conditions of the Permit. The Board's evaluation of these concerns is detailed below.

Łíídlı́ Kúé First Nation (LKFN)

A letter was submitted by Łíídlı́ Kúé First Nation (LKFN) during the review period, outlining concerns with the application related to 1) adverse impacts on Aboriginal and Treaty Rights, 2) wildlife and habitat disturbance, and 3) the spill risk and possible adverse impacts to water systems.¹⁵ Despite these noted concerns, LKFN did not request or indicate that the Project should be referred to Environmental Assessment.

Adverse Impacts on Aboriginal and Treaty Rights

LKFN were concerned that the work proposed will be a precursor for future larger developments, in an area they consider sensitive, both ecologically and culturally, which could have direct consequences for the exercise of their constitutionally protected rights. They recommended that Fireweed engage with LKFN to determine the appropriate mitigation and accommodation measures. Fireweed responded that they:

...will continue to engage with the LKFN and other relevant parties with an aim to identifying and implementing appropriate management and mitigation measures, as was the case for this application. Fireweed looks forward to continuing to work with LKFN on

¹⁵ See MVLWB Online Registry for [Fireweed – Mactung - LKFN comments on application – May13 25](#).

this Mactung LUP application, the Mactung Project as it advances and Fireweed's activities in the area. Fireweed respects the importance of the area to LKFN and other parties.¹⁶

The Board understands that engagement with the LKFN has occurred as outlined in the Engagement Plan, and it will continue as the project progresses.

Wildlife and Habitat Disturbance

LKFN also outlined concerns that the proposed work would introduce both direct and indirect disturbances to key wildlife species including woodland caribou, barren-ground caribou, Redstone caribou, Dall sheep, moose, and other culturally significant species. They recommended that Fireweed put forth seasonal restrictions on certain activities and include Indigenous-led monitoring throughout the project. They requested Fireweed engage further. Fireweed responded to these comments outlining there are:

...a broad range of mitigation and management measures that will be implemented in association with the activities outlined in this LUP application. These measures work to minimize or eliminate impacts to ungulates, including the species identified by LKFN. Fireweed is, and will continue, working with relevant parties during the conduct of these baseline studies to ensuring they capture relevant information and that suitable mitigation and management measures are developed. Fireweed notes that any future regulatory applications would also be subject to public review, consideration, and comment. Similarly, the baseline studies are also subject to review and comment through the applicable licencing processes.

Spill Risk to Water Systems

There were concerns raised regarding the spill risk and potential water system impacts, and LKFN requested that Fireweed provide an in-depth spill plan, update the notifications to include LKFN, and give LKFN the opportunity to ensure potential spill sites are properly remediated and monitored. Fireweed responded to these concerns by stating:

Fireweed has included a comprehensive Spill Contingency Plan (SCP) with this application which includes a reporting protocol aligned with territorial requirements and standard best practice in the NWT. The SCP specifies that all reportable spills are filed on occurrence with the Northwest Territories/Nunavut Spill Line, who post the information publicly. If a spill has potential to affect the public, the SCP also requires that Fireweed immediately notify appropriate community governments. Fireweed will ensure that appropriate contacts for local Indigenous Nations are included. Applicable regulatory requirements, notifications, and documentation requirements will be adhered to. The SCP also outlines the procedures for prompt and comprehensive addressing of spills.

¹⁶ See MVLWB Online Registry for [Fireweed – Mactung – Reviewer Comments and Responses Summary Table – May13 25](#).

First Nation of Na-Cho Nyäk Dun (FNNND)

FNNND submitted a letter on May 21, 2025, which outlined their main concerns of the Project related to 1) cumulative effects, 2) project splitting, 3) fish and wildlife, and 4) adjustment of security using an environmental risk factor. The Board discusses these concerns below.

Cumulative Effects

The FNNND highlighted the need to understand the overall nature of activities and context of the proposed activities.¹⁷ FNNND recommended in their letter (Comment #1) that “Cumulative effects studies should be done for water quality within watersheds, loss of riparian zones, linear development, etc.” Fireweed responded to this comment (#1) by stating:

Fireweed acknowledges FNNND’s concerns regarding potential cumulative effects in FNNND traditional territory. A broad range of mitigation measures has been proposed to address potential environmental effects of activities associated with this LUP application, as was prepared for the Class 4 Approval for Mactung claims in the Yukon. Fireweed looks forward to further holistic discussions with FNNND leadership and staff regarding Fireweed’s studies and exploration projects in the Macmillan Pass area, subject to FNNND’s availability.¹⁸

Fireweed also commented (#5) that “Fireweed intends to implement a range of environmental baseline studies in the area, including for water quality, the results of which can be shared with interested parties.” The Board has considered the Mactung Project as a whole, and notes that it is limited to mineral exploration and field investigations primarily located in a previously disturbed area. The proposed activities are expected to have minimal environmental impacts which can be mitigated by the Permit conditions as well as the land use approvals in the Yukon. As a result, the cumulative effects of the Mactung Project are expected to be limited.

The Board is satisfied that Fireweed has outlined mitigation measures to address potential environmental effects related to cumulative effects and that Fireweed is willing to share data with interested parties.

Project Splitting

FNNND in their response letter also outlined a main concern related to project splitting. They state that:

The Type A Land Use Permit currently before the Board only involves activities that spatially exist within mineral leases in the NWT. However, multiple activities are split across the Yukon/NWT border and under two different review/assessment regimes. FNNND does not believe the full potential effects (particularly cumulative effects) on lands, waters, our non-human kin, and FNNND rights are fully accounted for in the segregated scenario.... We suggest the spatial scope of the assessment be increased and

¹⁷ See MVLWB Online Registry for [Fireweed – Mactung – FNNND comments on application – May21_25.](#)

¹⁸ See MVLWB Online Registry for [FNNND and Fireweed Reviewer Comments and Responses – May23_25.](#)

existing assessment of associated activities by YESAB be incorporated as appropriate. While there is no Land Use Plan developed for the region of the Yukon directly adjacent to the proposed project, the Sahtú Land Use Plan within the NWT has some clearly specified directives which could be adopted for the full suite of activities.

Fireweed did not respond directly to this concern. As per the discussion above regarding cumulative effects and in section 4.0, the scope of the screening applies to the entire Mactung Project, which addresses this concern of project splitting.

Fish and Wildlife

FNNND have concerns related to fish and wildlife, and state:

Maintaining the health of FNNND's lands and waters is a constitutionally protected right for FNNND. Maintaining healthy lands and waters in turn provides for maintaining healthy populations of fish and wildlife that are necessary for the exercise of FNNND's harvesting rights. FNNND expects the Proponent to adhere to the below mitigations if the Proposed Project is approved to ensure that FNNND's rights are protected...The Proponent states...they will avoid helicopter-based disturbance during peak wildlife sensitivity periods, such as caribou calving, "whenever possible" and conduct activities outside of sensitive periods to the "extent practical." FNNND sees these mitigations as necessary for the protection of key species in this area. Maintaining these terms for setbacks and timing windows for wildlife should therefore be applied as 'shall' terms in the land use permit.¹⁹

Fireweed responded to Comment #9 related to helicopter use that:

Fireweed has outlined a broad range of mitigation and management measures that will be implemented in association with the activities outlined in this LUP application. These measures work to minimize or eliminate impacts to wildlife, including sensitive species such as caribou. Fireweed is, and will continue, working with relevant parties during the conduct of these baseline studies to evaluate the effectiveness of mitigation measures and adapt suitable mitigation as appropriate. Fireweed's Heritage Resources and Wildlife Management and Monitoring Plan (HRWMMP) outlines the mitigation and management measures protective of wildlife, including disturbances related to noise and human presence and will minimize overlap with sensitive periods.²⁰

The Board would like to note that Fireweed must adhere to the Sahtú Land Use Plan and this Plan includes protective measures and horizontal and vertical setbacks for wildlife and habitat, which they have outlined in their HRWMMP.

Environmental Risk Factor

¹⁹ See MVLWB Online Registry for [Fireweed – Mactung – FNNND comments on application – May21 25.](#)

²⁰ See MVLWB Online Registry for [FNNND and Fireweed Reviewer Comments and Responses – May23 25.](#)

FNNND recommend in their letter to “adjust the Environmental Risk Factor multiplier in the Land Use Permit Security worksheet to reflect an area of high environmental value,” and mentions it in the Mitigations Table of their letter²¹. Fireweed Comment #2 did not respond directly to this point regarding the change of an environmental risk factor. This is a concern that the Board will address in the Land Use Permit Reasons for Decision.

7.0 Conclusion

For the purposes of this screening, the Board has considered the Mactung Project as a whole. The portion of the Mactung Project activities that are located in the Yukon have already undergone an Environmental Assessment, and the Board has determined that these activities in the Yukon do not require any further screening.

The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed Mactung NWT Field Investigations Project. Based on the evidence, it is the Board’s opinion that the proposed Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the [MVRMA](#). The Board has therefore decided not to refer the proposed Project to Environmental Assessment. If the Board does not receive a notice of referral to environmental assessment by June 8, 2025, the Board can issue the Permit Licence on June 9, 2025.

SIGNATURE



Tanya MacIntosh, Chair
Mackenzie Valley Land and Water Board

May 29, 2025

Date

²¹ See MVLWB Online Registry for [Fireweed – Mactung – FNNND comments on application – May21_25](#).