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www.slwb.com

July 14, 2026

File: S26X-001

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: Northern Transportation Route Initiative – Notice of Preliminary Screening Determination – Application for Land Use Permit – Miscellaneous – Sawmill Bay of Great Bear Lake, NT

The Sahtu Land and Water Board (Board) met on July 14, 2026, and considered the Application Package from Atomic Energy of Canada Limited (AECL) for Land Use Permit (Permit) S26X-001 for the Northern Transportation Route Initiative (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, is attached.

If the Board does not receive notice of referral to environmental assessment, it can proceed with issuance of Permit S26X-001 on Saturday July 25, 2026.

The Board and staff look forward to continued communications throughout the pause period. Please contact Paul Dixon [via email](#) or at (867) 598-2413 with any questions or concerns regarding this letter.

Yours sincerely,



Valerie Gordon
Chair, Sahtú Land and Water Board

BCC'd to: Déłnę Distribution List
 Paul McCelland, Director of Waste Management & Technical Support – AECL
 Trevor Balsdon, Project Lead - CNL

Attached: Preliminary Screening Determination and Reasons for Decision



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Preliminary Screening Determination and Reasons for Decision

Land Use Permit Application	
File Number	S26X-001
Company	Atomic Energy of Canada Ltd.
Project	Northern Transportation Route Initiative Project
Location	Sawmill Bay (Great Bear Lake), NT
Activity	Miscellaneous
Date of Decision	July 14, 2026

1.0 Decision

In accordance with subsection 124(1) of the [Mackenzie Valley Resource Management Act](#) (MVRMA), the Sahtu Land and Water Board (SLWB or Board) met on July 14, 2026, to make a preliminary screening determination on the Application from Atomic Energy of Canada Ltd (AECL or Applicant) for Land Use Permit S26X-001 (Permit)¹ for the Northern Transportation Route Initiative Project (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 SLWB Online Registry www.slwb.com for [S26X-001 – Permit Application – Jun24 26](#)

² The Project is the Sawmill Bay – Northern Transportation Route Initiative, 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 determination, including reasons for its decision, are detailed in sections [3.0](#) and [4.0](#).

2.0 List of Defined Terms and Acronyms

Applicant	Atomic Energy of Canada Limited
Application	The complete application package submitted by the Applicant for Use Permit S26X-001.
Board	Sahtu Land and Water Board
CIRNAC	Crown Indigenous Relations and Northern Affairs Canada
CRP	Closure and Reclamation Plan
DFO	Department of Fisheries and Oceans Canada
EA	Environmental Assessment
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
IR	Information Request
Inspector	An Inspector designated under subsection 84(1) of the Mackenzie Valley Resource Management Act
LWBs	Land and Water Boards of the Mackenzie Valley
MVRMA	Mackenzie Valley Resource Management Act
NSMA	North Slave Metis Alliance
OHWM	Ordinary High-Water Mark
ORS	Online Review System (www.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 S26X-001
Project	Northern Transportation Route Initiative Project, which is the proposed development (as defined in Part 5 of the MVRMA). ³
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
SNP	Surveillance Network Program
SLWB or Board	Sahtu Land and Water Board
SRRB	Sahtu Renewable Resources Board
Standard Licence Conditions	LWB Standard Water Licence Conditions Template
Standard Permit Conditions	LWB Standard Land Use Permit Conditions Template
TG	Tłı̨chǫ Government
TK	Traditional Knowledge
WMP	Waste Management Plan

³ “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.”

YKDFN	Yellowknives Dene First Nation
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3.0 Background and Scope of Screening

The purpose of this Application is to complete environmental characterization at Sawmill Bay, NT which is an area along the former Northern Transportation Route (NTR). The activities include the delineation of residual uranium-ore spill sites, by test-pitting and sampling, in advance of future remediation. No remediation is to occur at this stage, only characterization work. As well, a camp will be set up at Sawmill Bay. A five-year term is requested for the permit. Please note that AECL has obtained an access agreement with the Dłı́nǵ Got'ı́nǵ Government, and is in the process of obtaining an access agreement with Crown Indigenous Relations and Northern Affairs Canada, Contaminants and Remediation Division (CIRNAC-CARD) to access the Sahtú and Federal lands (a split-interest project).

Traditional Knowledge Studies have been completed for the Sawmill Bay area in 2009 and 2016 with community engagement expected to be ongoing throughout the duration of the Project.

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. The details of the Board's analysis are set out in section [4.0](#) below.

3.1 Scope of Screening:

New Areas and Activities:

The proposed project area is located on the lands surrounding Sawmill Bay of Great Bear Lake, NT. The project includes multiple sites within the general area of Sawmill Bay for which characterization work will be undertaken to delineate uranium impacted soils to be cleaned up in a future permit. The Applicant will be establishing a camp on previously disturbed land at Sawmill Bay to support this work. The characterization work will consist of the following activities:

- Use of heavy equipment, vehicles, and machines;
- Construction, operation, maintenance of camp;
- Construction, operation, maintenance, brush clearing of trails;
- Construction, operation, maintenance, and use of staging areas and fuel storage;
- Water withdrawal for camp use and dust suppression;
- Test-pitting, sampling and testing of soils and rock for delineation; and
- Non-hazardous and hazardous waste management.

3.2 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 June 11, 2026, inviting reviewers to provide comments

and recommendations on the Applications and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due June 24, 2026, with responses from the Applicant due July 1, 2026. The Board received comments and recommendations from Department of Fisheries and Oceans Canada (DFO), Crown Indigenous Relations and Northern Affairs Canada (CIRNAC), North Slave Metis Alliance (NSMA), Yellowknives Dene First Nation (YKDFN), Sahtu Renewable Resources Board (SRRB), and Government of the Northwest Territories – Education, Culture, and Employment – Prince of Wales Northern Heritage Centre (GNWT-ECE-PWNHC) (attached).⁴

Since there were no requests to extend the reviewer comment deadline, 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](#).

The Board is also satisfied that notice of the Application was provided to the Délı̨ne Got'ı̨ne 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](#).

4.0 Potential Impacts and Proposed Mitigations

All Parties have had an opportunity to provide recommendations to the Board regarding draft conditions. In finalizing the conditions, the Board will consider these recommendations and all of the evidence provided through the regulatory proceeding.

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.

⁴ See SLWB Online Registry for [S26X-001 – Review Summary Table – Jul1 26](#)

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

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
LAND			
• Soil contamination • Soil compaction • Destabilization/erosion • Change in soil structure • Inability to support vegetation	• Use of heavy equipment, vehicles and machines • Construction, operation, maintenance of camp • Construction, operation, maintenance, brush clearing of trails • Construction, operation, maintenance, and use of staging areas and fuel storage • Water withdrawal for camp use and dust suppression • Test-pitting, sampling and testing of soils and rock for delineation • Non-hazardous and hazardous waste management	The Applicant proposed the following mitigations in the Application: • All characterization work limited to previously disturbed areas and existing trails/access; no new roads, trails, or ground disturbance outside these zones. • Shallow test pits (maximum ~1 m depth, above water table) excavated in thin layers and immediately backfilled/graded to pre-disturbance condition to protect permafrost and minimize erosion/ponding. • Erosion and Sedimentation Management Plan implemented throughout; procedural and structural BMPs (silt fence, mulching, topsoiling, slope texturing/grading, fibre rolls/wattles, brush mattress, rough & loose surface configuration) applied based on site-specific risk assessment. • Weekly inspections of all erosion/sediment controls by trained environmental monitor; documented on Erosion Control Inspection Form; maintenance or additional controls implemented as needed • Spill prevention measures: secondary containment for all fuel/hazardous materials; drip trays under equipment when not in use; daily visual inspections of vehicles/equipment/hydraulic systems; fuel caches and transfers minimum 100 m from OHWM on flat, stable terrain.	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 and will not be a cause of public concern.

		• Uranium-contaminated and hydrocarbon-contaminated soils excavated, stored in covered temporary areas or Hazardous Class I containers ≥100 m from any waterbody/watercourse, sampled/analyzed, then transported off-site to licensed facility (e.g., Pembina Area Landfill for NORM waste meeting criteria). • Pre- and post-field gamma radiation surveys on all equipment; equipment cleaned on-site and confirmed at background levels before demobilization. • All equipment, debris, structures, garbage, and waste removed from site at end of activities; natural revegetation promoted by scarifying disturbed surfaces where appropriate and returning soil to original location. Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #2: As described in the impact mitigation table and the Erosion and Sedimentation Management Plan (ESMP), impacts to permafrost are expected to be minimal given shallow excavation depths and use of best management practices (e.g., by reducing periods when soil is exposed). In addition, AECL will reduce the number of test pits developed to the extent practicable to limit disturbance to the surrounding area. AECL will comply with the permafrost protection standard condition in the draft land use permit and believes permafrost monitoring would be unnecessarily restrictive for a small scale, temporary characterization program that will occur 4-8 weeks/year and that will not create large, permanent structures (e.g., buildings).	
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		Response to SRRB Comment ID #4: Materials taken from borrow source(s) will be used for access and trail upgrades and will only be returned to borrow source(s) upon agreement with the Déline Got'ine Government after remediation. Any unused materials will be returned if no longer required. Borrow sources will also be maintained in accordance with the ESMP to prevent ponding. Further, as AECL has an ESMP in place, AECL does not believe that an additional condition outside of compliance with the ESMP would be necessary. Topsoil from borrow pits will be retained and returned to borrow pits to promote passive revegetation, similar to other projects across the NWT. At the end of remediation, developed borrow source(s) and historic borrow sources will be remediated as agreed with the Déline Got'ine Government. Response to SRRB Comment ID #5: As described in the rationale for the standard land use permit conditions associated with the “disposal of overburden” condition, overburden includes the layer of soil above usable or needed material. Given this description, AECL does not believe that a definition for overburden would be required in the land use permit. Overburden will be deposited next to borrow pits and returned to the surface of the borrow pit prior to closure or at the direction of the Inspectors. Response to SRRB Comment ID #29: Borrow pits will be excavated, backfilled, and recontoured in accordance with best practices outlined in the ESMP.	
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		Response to SRRB Comment ID #30: Borrow source(s) will be excavated using a tractor backhoe or mini excavator and backfilled with overburden from the upper layers of the borrow source to promote revegetation. Any slopes will either be flattened or stabilized to create a gentle slope. AECL will require a small borrow source to complete road, trail and air strip repairs for site travel. As the volume of materials required is less than 25 m³, borrow source development is expected to have minimal impact to the surrounding area. For clarity, borrow source excavation is a mitigation to reduce the possibility of erosion. Response to SRRB Comment ID #32: Test pit locations will preference flat unsloping locations away from watercourses in accordance with the land use permit. Test pits will be backfilled within 2 hours following excavation. Test pit locations will be wetted with water prior to excavation to prevent dust generation during excavation and backfilling. Typically only 5-8 test pits can be completed in a day and each test pit utilizes under 1m³ of water to be used as dust suppression. Response to SRRB Comment ID #59: While unlikely to be required for this small project, AECL will use best management practices (e.g., proper grading and sloping, temporary drainage features, backfilling etc.) to prevent ponding if required. Response to SRRB Comment ID #63: Test pits will be under 2m in length by 2m in width and will be backfilled with the test pit spoils within approximately 2 hours of excavation and prior to moving to a new test pit location.	
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		Response to SRRB Comment ID #70: As characterization work is expected to occur over a short period of time (i.e., 4-8 weeks per year), occur over a small area, does not require stream crossings and will not create permanent structures (e.g., buildings), erosion risk is low. A map of susceptible areas, locations of erosion control structures and monitoring is an unnecessary level of detail considering this context. As stated in the ESMP, it is an operational guide and should provide flexibility and options to respond to concerns as they arise and to meet land use permit conditions. Note also that the ESMP Conformity Table originates from water licence standard conditions, and is not included in the land use permit standard conditions. As such it is provided only as guidance. Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) Response to CIRNAC Comment ID #2: Test pits create slopes, which are considered in the ESMP. As described in response to SRRB#63, test pits are anticipated to be no more than 4 m² and will be backfilled within two hours. As such, they pose minimal erosion risk. Response to CIRNAC Comment ID #3: At a minimum during test pit excavation activities, approximately fifty (50) linear feet of sediment fencing and two (2) rolls of wattle will be maintained on site. Response to CIRNAC Comment ID #13: Once the location is known a map and coordinates will be provided to the Inspectors. The locations of associated camp infrastructure, including sumps, waste management areas, and fuel storage facilities, should also be confirmed in advance. The hope is that one	
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		camp location can be utilized. However camp contractors will vary year by year and may need to change. Should camp locations change, all fuel and stored waste will either be removed or transported to the new location. Response to CIRNAC Comment ID #14: Borrow material will be used only as a contingency if required to avoid erosion. The locations identified have yet to be assessed and will be assessed prior to any removal. At this time no material is expected to be utilized. If any are required, it is anticipated that under 10m3 would be required. CNL/AECL is in contact with CIRNAC's CARD division and will contact CIRNAC-CARD if any road washouts are noticed and confirm location to get material to repair prior to repairing any roadways. Response to CIRNAC Comment ID #15: As the characterization work completed at Sawmill Bay will be temporary, small scale, and followed by a larger remediation program, it is proposed that characterization work be included in the CRP for remediation (expected submission in 2030 with new land use permit application). If it is decided with Engagement partners that remediation should not occur following characterization, all camp materials, equipment and garbage will be removed from the site. The land use permit will then be closed through a Final Plan and site visit by the Inspector. Government of the Northwest Territories – Education, Culture, and Employment (GNWT-ECE-PWNHC) Response to GNWT-ECE-PWNHC ID #1: AECL will coordinate the completion of an AOA and an AIA prior	
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		to development of these borrow sources. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:⁵ ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK ○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS DOGLEG APPROACHES ○ MEANDER LINES ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS	
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⁵ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination

WATER			
• Water table alteration • Groundwater infiltration changes • Changes in groundwater quality • Groundwater temperature changes • Loss or change in extent of permafrost • Changes in seasonal fluctuations of permafrost • Change in permafrost persistence • Surface flow or level changes (permanent, temporary, seasonal) • Surface water drainage changes • Surface water temperature changes	• Use of heavy equipment, vehicles and machines • Construction, operation, maintenance of camp • Construction, operation, maintenance, brush clearing of trails • Construction, operation, maintenance, and use of staging areas and fuel storage • Water withdrawal for camp use and dust suppression • Test-pitting, sampling and testing of soils and rock for delineation • Non-hazardous and hazardous waste management	The Applicant proposed the following mitigations in the Application: • No work conducted in water, below water table, or on lakebed/shoreline; all test pitting and activities on land only. • Spill Contingency Plan implemented in full: spill kits maintained at fuel storage/transfer areas and in vehicles; trained personnel; immediate stop/contain/recover procedures; NT-NU 24-hour Spill Report Line (867-920-8130) and Inspector notification for reportable spills or those near water. • Fuel storage, caches, and transfers minimum 100 m from Ordinary High Water Mark (OHWM) of any watercourse; secondary containment required; drip trays/spill mats used during fuelling and maintenance. • Erosion and sediment controls (silt fence, diversion ditches, mulching, etc.) prevent sediment or contaminated soil from entering nearby waterbodies; sediment-laden water removed before reaching water sources. • Small water volumes withdrawn only for camp use and dust suppression; no anticipated significant effects on water quantity, quality, or downstream drinking water sources. • Greywater treated through grease trap (emptied daily); sewage managed via pit/outhouse or incinerating toilet ≥100 m from OHWM; all waste removed or properly disposed per Waste Management Plan. Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #3:	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 and will not be a cause of public concern.

Changes in surface water quality		Only characterization to identify areas requiring remediation will be completed under this land use permit. Remediation activities are not expected to commence until 2030, and AECL will apply for a new land use permit for remediation at that time. Additional details on management of excavated materials can be provided in the land use permit application for remediation. Response to SRRB Comment ID #12: Concerns regarding impacts to surface waters, groundwater and sediments will be discussed further in the forthcoming Closure and Reclamation Plan. Requests for additional studies should not delay the planned terrestrial characterization and delineation studies. Response to SRRB Comment ID #28: Given the small extent and scale of the characterization work, that the work entails shallow surface excavations (i.e., up to 2 metres depth) and not wells, that a water licence is not required, a groundwater map is not required. Mapping groundwater would require drilling and installation of groundwater wells, creating significantly more effort, cost and delays without corresponding improvement to environmental management. Response to SRRB Comment ID #29: Borrow pits will be excavated, backfilled, and recontoured in accordance with best practices outlined in the ESMP. Response to SRRB Comment ID #30: Borrow source(s) will be excavated using a tractor backhoe or mini excavator and backfilled with overburden from the upper layers of the borrow source to promote revegetation. Any slopes will either be flattened or stabilized to create a gentle slope. AECL will require a small borrow source to complete road, trail	
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		and air strip repairs for site travel. As the volume of materials required is less than 25 m3, borrow source development is expected to have minimal impact to the surrounding area. For clarity, borrow source excavation is a mitigation to reduce the possibility of erosion. Response to SRRB Comment ID #53: Provision of water withdrawal sources is not within the scope of a land use permit, and total daily water withdrawal will be below the threshold of a water licence. Response to SRRB Comment ID #54: Refer to response to SRRB #53. Response to SRRB Comment ID #55: Water may be sprayed on equipment to remove dust. This will only occur in work areas, so the runoff will not affect vegetation and will be in areas of future remediation if deemed necessary by this characterization study. Response to SRRB Comment ID #58: Re-direction of surface water or runoff is an unlikely scenario but is included in case of heavy rainfall events. Re-direction may occur through shallow diversion ditches or low berms excavated using hand tools. Response to SRRB Comment ID #59: While unlikely to be required for this small project, AECL will use best management practices (e.g., proper grading and sloping, temporary drainage features, backfilling etc.) to prevent ponding if required. Response to SRRB Comment ID #71:	
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		Please see response SRRB #53. Department of Fisheries and Oceans Canada (DFO) Response to DFO Comment ID #1: AECL will follow DFO's protective measures for fish and fish habitat and standard codes of practice and protocols. No in-water works are planned for the characterization work occurring at Sawmill Bay, however, a request for review will be provided to DFO for future remediation work at the site. Remediation activities at Sawmill Bay will be conducted under a new land use permit and are expected to commence in 2030. Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) Response to CIRNAC Comment ID #5: As greywater and sewage are expected to include primarily biodegradable and/or natural materials and are managed by deposition within a sump, they are not considered particularly hazardous. Regardless, greywater loss outside of the sump will be reported as per a sewage spill described in Table 3. Response to CIRNAC Comment ID #11: Tracking of water withdrawal is not within the scope of a land use permit. Daily water withdrawal limits will be below the threshold of a water licence. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:⁶ ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK	
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⁶ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING	
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		○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ FINAL CLEANUP AND RESTORATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ ENGAGEMENT PLAN	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
AIR			
• Changes in air quality • Harm to living things • Increased greenhouse gases	• Use of heavy equipment, vehicles and machines • Construction, operation, maintenance of camp • Construction, operation, maintenance, brush clearing of trails • Construction, operation,	The Applicant proposed the following mitigations in the Application: • Dust suppression using water on existing trails and during soil handling/excavation where practical; soil disturbance minimized by excavating test pits in thin layers. • Stockpile and exposed soil management per Erosion and Sedimentation Management Plan; procedural BMPs limit duration and extent of exposed soils. • Equipment maintained in good working order to minimize exhaust emissions; no unnecessary idling.	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 and will not be a cause of public concern.

	maintenance, and use of staging areas and fuel storage • Water withdrawal for camp use and dust suppression • Test-pitting, sampling and testing of soils and rock for delineation • Non-hazardous and hazardous waste management	• Controlled open burning or incineration of burnable domestic waste only (per GNWT guidelines and Canada-Wide Standards for Dioxins/Furans); efficient operation and waste segregation to minimize emissions. Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #32: Test pit locations will preference flat unsloping locations away from watercourses in accordance with the land use permit. Test pits will be backfilled within 2 hours following excavation. Test pit locations will be wetted with water prior to excavation to prevent dust generation during excavation and backfilling. Typically only 5-8 test pits can be completed in a day and each test pit utilizes under 1m³ of water to be used as dust suppression. Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) Response to CIRNAC Comment ID #1: To minimize dust generation, a speed limit of 10 km/hr will be placed on vehicles traveling on the site. A water wagon will be onsite to spray down roads as needed when windy conditions are expected, or to mitigate dust when it is observed either from vehicle traffic or from wind generation within work areas. Test pits and borrow areas will be kept compact to the extent practicable and covered with tarps during windy conditions. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard	
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		conditions include:⁷ ○ LOCATION OF ACTIVITIES ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ WASTE MANAGEMENT PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ SPILL CONTINGENCY PLAN ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ ENGAGEMENT PLAN	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
VEGETATION			
• Direct loss of vegetation • Loss of species at risk or may-be-at-risk plants	• Use of heavy equipment, vehicles and machines • Construction, operation,	The Applicant proposed the following mitigations in the Application: • Work restricted to previously disturbed areas; no clearing of new vegetation or mature trees except where absolutely necessary for safety/access on existing trails.	Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant adverse impact on the

⁷ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

• Change in species composition • Introduction of non-native (invasive) species • Effects on plant health (dust, metals, toxins) • Increased risk of fire • Compaction of vegetation	maintenance of camp • Construction, operation, maintenance, brush clearing of trails • Construction, operation, maintenance, and use of staging areas and fuel storage • Water withdrawal for camp use and dust suppression • Test-pitting, sampling and testing of soils and rock for delineation • Non-hazardous and hazardous waste management	• Riparian zone preservation applied as a structural BMP where work occurs near watercourses. • Disturbed areas restored progressively: test pits backfilled/graded, brush flattened and bucked, surface scarified if appropriate, and soil returned to promote natural revegetation. • Mulching and topsoiling used as erosion-control BMPs to protect soil and support vegetation recovery. Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #4: Materials taken from borrow source(s) will be used for access and trail upgrades and will only be returned to borrow source(s) upon agreement with the Déłı̨́nê Got'ı̨́nê Government after remediation. Any unused materials will be returned if no longer required. Borrow sources will also be maintained in accordance with the ESMP to prevent ponding. Further, as AECL has an ESMP in place, AECL does not believe that an additional condition outside of compliance with the ESMP would be necessary. Topsoil from borrow pits will be retained and returned to borrow pits to promote passive revegetation, similar to other projects across the NWT. At the end of remediation, developed borrow source(s) and historic borrow sources will be remediated as agreed with the Déłı̨́nê Got'ı̨́nê Government. Response to SRRB Comment ID #33: AECL will promote revegetation as described in the application	environment and will not be a cause of public concern.
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		form to the extent practicable as passive revegetation has been demonstrated to be an effective strategy in the NWT. Given the size and temporary nature of the project, AECL believes that standard land use permit conditions (e.g., permafrost protection) and the use of historic trails wherever possible will be sufficient to mitigate impacts on vegetation. Response to SRRB Comment ID #35: Please see response to SRRB #33. Response to SRRB Comment ID #36: Please see response to SRRB #33. As the impact to the site will be low and at a small, temporary scale, AECL does not believe that active revegetation will be necessary. Response to SRRB Comment ID #37: Please see response to SRRB #15. Reclamation of access trails will be conducted in accordance with discussions with the D��l��n�� Got'��n�� Government. Details on closure will be provided with the land use permit application for remediation in 2030. Response to SRRB Comment ID #47: Please see response to SRRB #4 and #33. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:⁸ ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK ○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK	
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⁸ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DOGLEG APPROACHES ○ MEANDER LINES ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK	
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		○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ ENGAGEMENT PLAN	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
TERRESTRIAL WILDLIFE HABITAT			
• Direct loss or removal of habitat, dens, or nests • Loss or removal of keystone species and/ or species at risk habitat	• Use of heavy equipment, vehicles and machines • Construction, operation, maintenance of camp	The Applicant proposed the following mitigations in the Application: • Characterization activities on previously disturbed land only; care taken to minimize interaction with wildlife; dens, nests, or sensitive features observed will be avoided and marked.	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 and will not be a cause of public concern.

• Fragmentation of wildlife corridor • Direct injury or mortality • Disturbances to key lifecycle stages: breeding, feeding, nesting, staging • Effects on population abundance • Change in species diversity • Effects on wildlife health (toxins, metals, etc.) • Changes to migratory movement patterns • Changes to predator-prey relationships • Human-wildlife conflicts	• Construction, operation, maintenance, brush clearing of trails • Construction, operation, maintenance, and use of staging areas and fuel storage • Water withdrawal for camp use and dust suppression • Test-pitting, sampling and testing of soils and rock for delineation • Non-hazardous and hazardous waste management	• Wildlife Monitors utilized; wildlife interactions documented. • Proper waste management (animal-proof containers, daily inspections, immediate removal of all attractants and waste) to avoid habituating wildlife. • No new roads or significant habitat fragmentation; activities designed to keep disturbances to the absolute minimum required. • Future remediation phase will improve long-term site condition for wildlife (removal of historic uranium ore contamination). Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #8: Given the small scale and scope of the project (i.e., characterization and small-scale access trail repair work over 4-8 weeks/year), AECL believes that the standard conditions (e.g., caribou disturbance) and wildlife deterrent strategies would be sufficient to protect wildlife and a Wildlife Management and Monitoring Plan would not be required. Further, as described in the Sahtú Land Use Plan conformity table, the Waste Management Plan will be implemented to mitigate potential impacts to wildlife and reduce animal attractants, and the project will utilize local resources as Wildlife Monitors. The project will not overlap with the summer and rut range of the South Nahanni northern mountain woodland caribou or the Bluenose West and Bluenose East fall-winter core ranges. Response to SRRB Comment ID #9:	
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		Rather than install fencing and markers, which create hazards for wildlife, the intent of the project is to remove contaminated soils to provide long-term environmental protection. The Déliᑭ Got'ᑭ Government Remediation Team has also expressed they do not wish fences to be installed due the risk for wildlife. Signage is posted at locations of known spilt uranium ore identifying the hazard to anyone in the area and to not excavate and relocate any soil. Response to SRRB Comment ID #10: AECL welcomes further discussions with the SRRB and RRCs as the project progresses as well as future input on management plans and land use permit applications during the public review process. As described in the Engagement Plan, AECL conducts regular engagement with local communities and Governments to communicate knowledge about the Northern Transportation Route (NTR) and identify community concerns. AECL holds ongoing meetings and provides opportunities for meaningful engagement through input on project plans, communications and participation opportunities. Response to SRRB Comment ID #18: Please see response to SRRB #15. As noted in the Northern Transportation Route Federal Assessment Report (SENES 2013), radiation doses are low and well below the internationally-accepted public dose limit of 1 mSv/y for members of the public. Most of the sites in Sawmill Bay exhibit	
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		gamma radiation levels that are comparable to background and radiological health risks are not expected. AECL will continue to engage with affected parties throughout the life of the project and as requested as described in the Engagement Plan. Engagement will include communications through working group meetings, in-person information sessions, brochures, newsletters, signage, etc. As AECL is required to comply with the Engagement Plan under the land use permit, it considers plain language and local language summaries, precautionary measures and additional submissions to be outside of the scope of a land use permit. Maps of the site will continue to be available through the SLWB's public registry and any updated maps will be provided to the SLWB. Response to SRRB Comment ID #40: Habitat fragmentation is not a concern in the context of a short-term and limited delineation program with small project footprint and confined to a small land use permit area, and as vegetation clearing is not required for an un-forested landscape. Response to SRRB Comment ID #42: Please see response to SRRB #8 and #10. AECL understands that wildlife surveys and monitoring are not within the Land and Water Board's jurisdiction. AECL will work with Elders, community members and Délı̨nę government representatives to adhere to land use permit conditions protecting wildlife habitat and caribou. There will be no disturbance of nesting areas during the nesting season unless a nest search by a qualified biologist confirms that no nests are present. Response to SRRB Comment ID #43:	
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		Given the small-scale nature of the characterization work, AECL believes that the standard land use permit conditions are sufficient to protect nests. Response to SRRB Comment ID #80: AECL looks forward to discussing the project with the SRRB and/or Délı̨ę RRC. Response to SRRB Comment ID #82: Spills will be avoided and remediated regardless of the presence of wildlife. The SCP has been prepared using the LWB Spill Contingency Plan template for mineral exploration, an activity of similar scale and scope. This template does not required to describe presence of wildlife, nor does the Guideline for Spill Continency Planning. AECL will clean up any spills immediately and if safe to do so, in accordance with the land use permit conditions and Inspector guidance and directives. Response to SRRB Comment ID #83: In the unlikely event of a spill event affecting wildlife habitat, remediation will follow the guidance and directives of the Inspector. Response to SRRB Comment ID #84: Please see response to SRRB #9. Remediation of spills will be immediate. Response to SRRB Comment ID #90: Incinerators are intended to mitigate impacts to wildlife by eliminating food and other waste odours that may attract wildlife. The incinerator itself does not pose a risk to wildlife and does not provide wildlife habitat.	
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		The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:⁹ ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK ○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DOGLEG APPROACHES ○ MEANDER LINES ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS	
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⁹ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ NOTIFICATION OF SOLID WASTE DISPOSAL ○ HABITAT DAMAGE ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ CARIBOU DISTURBANCE ○ MIGRATORY BIRD NEST DISTURBANCE	
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		○ ENGAGEMENT PLAN	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
AQUATIC HABITAT			
- Breeding disturbances - Changes in species diversity - Effects on health (toxins, metals, sediment, etc.) - Changes to migratory movement patterns - Changes to predator-prey relationships - Effects on population abundance - Change in species diversity	- Use of heavy equipment, vehicles and machines - Construction, operation, maintenance of camp - Construction, operation, maintenance, brush clearing of trails - Construction, operation, maintenance, and use of staging areas and fuel storage - Water withdrawal for camp use and dust suppression - Test-pitting, sampling and testing of soils and rock for delineation - Non-hazardous and hazardous waste	The Applicant proposed the following mitigations in the Application: - No in-water work, shoreline disturbance, or activities below the water table during characterization phase. - Robust erosion/sediment controls and spill response procedures prevent sediment, fuel, or contaminated material from entering fish-bearing waters. - Small water withdrawals for camp and dust suppression only; no anticipated effects on water quantity, quality, or fish habitat. - Spill response includes specific procedures for spills on water (sorberent booms, downstream deployment on flowing waterways). Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #3: Only characterization to identify areas requiring remediation will be completed under this land use permit. Remediation activities are not expected to commence until 2030, and AECL will apply for a new land use permit for remediation at that time. Additional	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 and will not be a cause of public concern.

	management	details on management of excavated materials can be provided in the land use permit application for remediation. Response to SRRB Comment ID #11: Please see response to DFO #1. Response to SRRB Comment ID #12: Concerns regarding impacts to surface waters, groundwater and sediments will be discussed further in the forthcoming Closure and Reclamation Plan. Requests for additional studies should not delay the planned terrestrial characterization and delineation studies. Response to SRRB Comment ID #23: The volume of water to be withdrawn for the project will be small, for a limited period (i.e., 4-8 weeks/year) and well below the requirements of a water licence. Therefore, additional details are not required under the land use permit. Water will likely be withdrawn using portable water pump fitted with an intake screen that aligns with DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater. Response to SRRB Comment ID #75: In 2007 seven lake sediment samples were collected from across the Beach Landing and the locations and results are included in a Phase II Environmental Site Assessment conducted in 2008 (Franz, 2008). Response to SRRB Comment ID #77: Please see response to SRRB #15. Department of Fisheries and Oceans Canada (DFO) Response to DFO Comment ID #1: AECL will follow DFO's protective measures for fish and fish	
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		habitat and standard codes of practice and protocols. No in-water works are planned for the characterization work occurring at Sawmill Bay, however, a request for review will be provided to DFO for future remediation work at the site. Remediation activities at Sawmill Bay will be conducted under a new land use permit and are expected to commence in 2030. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:¹⁰ ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK ○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING	
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¹⁰ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ HABITAT DAMAGE ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ MIGRATORY BIRD NEST DISTURBANCE	
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		○ ENGAGEMENT PLAN	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
WILDLIFE HARVESTING			
- Loss or reduction in game species populations - Effects on traditional land use, subsistence, and harvesting rights	- Use of heavy equipment, vehicles and machines - Construction, operation, maintenance of camp - Construction, operation, maintenance, brush clearing of trails - Construction, operation, maintenance, and use of staging areas and fuel storage - Water withdrawal for camp use and dust suppression - Test-pitting, sampling and testing of soils and rock for delineation - Non-hazardous and hazardous waste	The Applicant proposed the following mitigations in the Application: - Project staff committed to working with Délı̨ne Got'ı̨ne Government and community to minimize effects on traditional land use, subsistence harvesting, and harvesting rights. - Ongoing engagement throughout project duration; regular communications and updates provided via established working group. - Activities scheduled to avoid sensitive periods for caribou (e.g., summer/rut, core winter ranges) where practicable; winter work avoids Bluenose West/East core ranges. Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #15: The CCME guideline of 23 mg/kg is the most conservative published guideline that is protective of both agricultural and residential/parkland land use. The guideline is based on protection of the human health direct contact pathway which is the primary exposure risk for humans (i.e., exposure to uranium through dermal contact and inhalation of soil particulates) (CCME 2007). When deriving this guideline, the most sensitive receptor under	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 and will not be a cause of public concern.

	management	each of the land use categories was selected, and in this case was a preschool toddler based on their exposure load to mass ratio. Under an agriculture and residential/land use scenario, it assumes a toddler would be exposed to the contamination 24 hours a day, 7 days a week for 52 weeks a year. It is recognized that the guideline does not incorporate country food ingestion (consumption of wild game, berries, fish etc). While this consumption by Indigenous groups would be considered higher than the general public, the soil ingestion pathway still represents the highest risk for exposure as it involves direct contact to the contaminant. As Sawmill Bay is remote with no permanent residences, and used transiently, exposure through country food is not expected to be the primary route of exposure risk. In addition, as described in the application form and Engagement Plan, AECL has conducted extensive engagement with the Délı̨nę Got'ı̨nę Government and other Indigenous groups on the remediation of the Sawmill Bay site since the early 2000's. Engagement with the leaders of local Indigenous Governments and rightsholders determined that the remediation approach described in the application was the most favourable to reduce exposures. Response to SRRB Comment ID #16: Please see response to SRRB #15. Response to SRRB Comment ID #18: Please see response to SRRB #15. As noted in the Northern Transportation Route Federal Assessment Report (SENES 2013), radiation doses are low and well	
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		below the internationally-accepted public dose limit of 1 mSv/y for members of the public. Most of the sites in Sawmill Bay exhibit gamma radiation levels that are comparable to background and radiological health risks are not expected. AECL will continue to engage with affected parties throughout the life of the project and as requested as described in the Engagement Plan. Engagement will include communications through working group meetings, in-person information sessions, brochures, newsletters, signage, etc. As AECL is required to comply with the Engagement Plan under the land use permit, it considers plain language and local language summaries, precautionary measures and additional submissions to be outside of the scope of a land use permit. Maps of the site will continue to be available through the SLWB's public registry and any updated maps will be provided to the SLWB. Response to SRRB Comment ID #78: Please see response to SRRB #42. AECL's intent is to remove residual uranium ore as agreed to with local Indigenous Governments and communities so it is not encountered by wildlife and the public. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:¹¹ ○ LOCATION OF ACTIVITIES ○ PRIVATE PROPERTY SETBACK ○ CAMP SETBACK ○ SUMP SETBACK	
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¹¹ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ PARALLELL WATERCOURSE SETBACK ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DOGLEG APPROACHES ○ MEANDER LINES ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ HABITAT DAMAGE ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ RESPONSIBILITY FOR REMEDIATION COSTS	
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		○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ CARIBOU DISTURBANCE ○ MIGRATORY BIRD NEST DISTURBANCE ○ ENGAGEMENT PLAN	
Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
CULTURAL INTEGRITY AND HERITAGE RESOURCES			

• Change to or loss of cultural integrity • Change to or loss of traditional lifestyle • Change to or loss or heritage resources	• Use of heavy equipment, vehicles and machines • Construction, operation, maintenance of camp • Construction, operation, maintenance, brush clearing of trails • Construction, operation, maintenance, and use of staging areas and fuel storage • Water withdrawal for camp use and dust suppression • Test-pitting, sampling and testing of soils and rock for delineation • Non-hazardous and hazardous waste management	The Applicant proposed the following mitigations in the Application: • Archaeological Impact Assessment completed for Sawmill Bay project area (2023); no activities within setbacks of known archaeological or burial sites without appropriate mitigation and approvals (PWNHC, communities, affected families). • AECL committed to ongoing, collaborative engagement with Délı̨nę Got'ı̨nę Government and rightsholders; Traditional Knowledge incorporated into project planning (including use of Dene place names such as Bedahze and Gokwiech'e). • Regular project updates, planning input, and working group meetings with community leadership to ensure cultural considerations, sensitivities, and priorities are honored. • Project designed to respect the deep relationship between Indigenous Peoples and their lands, waters, and territories; focus on environmental protection for future generations. Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #44: The NTR Federal Assessment Report (SENES 2013) was completed to assess potential impacts and AECL is working to improve site access and conditions through this remediation project. AECL has collected Traditional Knowledge for the area and is working with the Délı̨nę Got'ı̨nę Government to prepare an updated study. AECL will continue to engage with the affected parties listed in the Engagement Plan and communicate discovery of archaeological sites per the land use permit conditions.	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 and will not be a cause of public concern.
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		Response to SRRB Comment ID #45: Please see response to SRRB #44. Response to SRRB Comment ID #79: AECL/CNL continues to support the Délı̨nę Got'ı̨nę Government on the development of a Traditional Knowledge study applicable to their lands including the Sawmill Bay area. Government of the Northwest Territories – Education, Culture, and Employment (GNWT-ECE-PWNHC) Response to GNWT-ECE-PWNHC ID #1: AECL will coordinate the completion of an AOA and an AIA prior to development of these borrow sources. Response to GNWT-ECE-PWNHC ID #2: AECL agrees with this recommendation. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:¹² ○ LOCATION OF ACTIVITIES ○ PRIVATE PROPERTY SETBACK ○ CAMP SETBACK ○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DOGLEG APPROACHES	
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¹² See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ MEANDER LINES ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ HABITAT DAMAGE ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ ARCHAEOLOGICAL BUFFER ○ SITE DISTURBANCE ○ SITE DISCOVERY AND NOTIFICATION ○ ARCHAEOLOGICAL OVERVIEW ○ AIA-HIGH POTENTIAL ○ AIA ○ RESPONSIBILITY FOR REMEDIATION COSTS	
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		○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ CARIBOU DISTURBANCE ○ MIGRATORY BIRD NEST DISTURBANCE ○ ENGAGEMENT PLAN	
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Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
SOCIAL AND ECONOMIC WELL-BEING			
- Increased human health hazard and risk - Economic opportunities or losses (employment, training) - Changes in ecological, cultural, social, or economic values identified for protection in approved land use plans - Impairment of the aesthetic quality of the land or water - Changes to the use of the area by other non-indigenous people (e.g., trappers, outfitters, residents, hunters, forest harvesters, other authorized projects)	- Use of heavy equipment, vehicles and machines - Construction, operation, maintenance of camp - Construction, operation, maintenance, brush clearing of trails - Construction, operation, maintenance, and use of staging areas and fuel storage - Water withdrawal for camp use and dust suppression - Test-pitting, sampling and testing of soils and rock for delineation - Non-hazardous and hazardous waste management	The Applicant proposed the following mitigations in the Application: - Local resources, camp staff, contractors, and equipment utilized where possible to provide direct community benefits. - Radiation protection program follows ALARA (As Low as Reasonably Achievable) principles: radiation awareness training for all personnel, periodic gamma dose monitoring by qualified surveyor, appropriate PPE (gloves, respiratory protection), minimize time near uranium materials, covered waste storage. - Health & Safety orientation and daily safety meetings; controlled areas monitored; equipment cleaned and surveyed before leaving site to protect workers and the public. - Engagement process ensures community input on methods and addresses concerns (community preference for removal and disposal over indefinite in-situ monitoring). - Future remediation phase will result in net environmental improvement, making the area safer and more suitable for traditional use, wildlife, and future generations. - All equipment, waste, and structures removed at end of activities; site left in condition safe for wildlife and other land users with no requirement for long-term active care.	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 and will not be a cause of public concern.

		Applicant Responses to Reviewer Comments: Sahtu Renewable Resources Board (SRRB) Response to SRRB Comment ID #15: The CCME guideline of 23 mg/kg is the most conservative published guideline that is protective of both agricultural and residential/parkland land use. The guideline is based on protection of the human health direct contact pathway which is the primary exposure risk for humans (i.e., exposure to uranium through dermal contact and inhalation of soil particulates) (CCME 2007). When deriving this guideline, the most sensitive receptor under each of the land use categories was selected, and in this case was a preschool toddler based on their exposure load to mass ratio. Under an agriculture and residential/land use scenario, it assumes a toddler would be exposed to the contamination 24 hours a day, 7 days a week for 52 weeks a year. It is recognized that the guideline does not incorporate country food ingestion (consumption of wild game, berries, fish etc). While this consumption by Indigenous groups would be considered higher than the general public, the soil ingestion pathway still represents the highest risk for exposure as it involves direct contact to the contaminant. As Sawmill Bay is remote with no permanent residences, and used transiently, exposure through country food is not expected to be the primary route of exposure risk. In addition, as described in the application form and Engagement Plan, AECL has conducted extensive engagement with the Délı̨nę Got'ı̨nę Government and other Indigenous groups on the remediation of the Sawmill Bay site since the early 2000's. Engagement with the leaders of local Indigenous Governments and rightsholders determined that the remediation approach	
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		described in the application was the most favourable to reduce exposures. Response to SRRB Comment ID #16: Please see response to SRRB #15. Response to SRRB Comment ID #18: Please see response to SRRB #15. As noted in the Northern Transportation Route Federal Assessment Report (SENES 2013), radiation doses are low and well below the internationally-accepted public dose limit of 1 mSv/y for members of the public. Most of the sites in Sawmill Bay exhibit gamma radiation levels that are comparable to background and radiological health risks are not expected. AECL will continue to engage with affected parties throughout the life of the project and as requested as described in the Engagement Plan. Engagement will include communications through working group meetings, in-person information sessions, brochures, newsletters, signage, etc. As AECL is required to comply with the Engagement Plan under the land use permit, it considers plain language and local language summaries, precautionary measures and additional submissions to be outside of the scope of a land use permit. Maps of the site will continue to be available through the SLWB's public registry and any updated maps will be provided to the SLWB. Response to SRRB Comment ID #34: AECL looks forward to involving local community members and youth in training and job opportunities at Sawmill Bay and other	
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		remediation sites as the project progresses. AECL and the Délı̨nę Got'ı̨nę Government are working together to coordinate these opportunities. Response to SRRB Comment ID #44: The NTR Federal Assessment Report (SENES 2013) was completed to assess potential impacts and AECL is working to improve site access and conditions through this remediation project. AECL has collected Traditional Knowledge for the area and is working with the Délı̨nę Got'ı̨nę Government to prepare an updated study. AECL will continue to engage with the affected parties listed in the Engagement Plan and communicate discovery of archaeological sites per the land use permit conditions. Response to SRRB Comment ID #45: Please see response to SRRB #44. Response to SRRB Comment ID #48: Please see response to SRRB #10 and #42. AECL looks forward to discussing the project further with the SRRB and Délı̨nę RRC but does not typically include regulators as affected parties in its Engagement Plan, as these groups will have an opportunity to provide comments on all management plans and applications through the public review process. AECL notes that CIRNAC is included in the Engagement Plan for coordination purposes as it conducts remediation work in the Sawmill Bay area as well. Response to SRRB Comment ID #49: AECL holds regular meetings with affected parties on a schedule agreed upon with these groups and identifies key stages in the project (e.g., project start, characterization completion, start of remediation) collaboratively. AECL believes that the level of detail	
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		provided in the Engagement Plan is sufficient. Response to SRRB Comment ID #50: The Engagement Plan can be updated to make records of concerns or issues available for review at any time on request. As the Engagement Record provided with the land use permit application is specific to application submission and management plans, it will not be updated. Response to SRRB Comment ID #51: Please see response to SRRB #50. Response to SRRB Comment ID #81: AECL notes that as the CRP is required for Board approval, the SRRB and RRCs will have an opportunity to review and comment on the CRP during public review. Community engagement completed for the CRP will be described with the CRP submission. North Slave Metis Alliance (NSMA) Response to NSMA Comment ID #1: AECL will update the contact information for North Slave Métis Alliance in the Engagement Plan accordingly and reach out to NSMA to initiate a project overview and dialogue. Yellowknives Dene First Nation (YKDFN) Response to YKDFN Comment ID #1: AECL thanks the YKDFN for its review of the land use permit application. Should any additional information be required as the project progresses, AECL is open discussing or meeting with YKDFN. The Board has standard permit conditions that are typically used to mitigate the identified potential impacts. These standard	
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		conditions include:¹³ ○ LOCATION OF ACTIVITIES ○ PRIVATE PROPERTY SETBACK ○ CAMP SETBACK ○ SUMP SETBACK ○ PARALLELL WATERCOURSE SETBACK ○ PARALLEL ROADS ○ WIDTH RIGHT-OF-WAY ○ USE APPROVED EQUIPMENT ○ PORTABLE RAMPS ○ DOGLEG APPROACHES ○ MEANDER LINES ○ DETOURS AND CROSSINGS ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ EROSION AND SEDIMENT MANAGEMENT PLAN ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ STREAM BANKS ○ MINIMIZE APPROACH ○ DRY FORDING ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ CHEMICALS ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL	
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¹³ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		○ WASTE PETROLEUM DISPOSAL ○ HABITAT DAMAGE ○ WASTE MANAGEMENT PLAN ○ GARBAGE CONTAINER ○ SEWAGE DISPOSAL – SUMP SETBACK ○ SEWAGE DISPOSAL – PLAN ○ ARCHAEOLOGICAL BUFFER ○ SITE DISTURBANCE ○ SITE DISCOVERY AND NOTIFICATION ○ ARCHAEOLOGICAL OVERVIEW ○ AIA-HIGH POTENTIAL ○ AIA ○ RESPONSIBILITY FOR REMEDIATION COSTS ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ MAXIMUM FUEL ON SITE ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ BRUSH DISPOSAL/TIME ○ MINIMIZE AREA CLEARED ○ CLOSURE AND RECLAMATION PLAN ○ DISPOSAL OF OVERBURDEN ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION	
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		○ PROGRESSIVE RECLAMATION ○ TRAILS RESTORATION ○ CARIBOU DISTURBANCE ○ MIGRATORY BIRD NEST DISTURBANCE ○ ENGAGEMENT PLAN	
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4.1 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 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.

4.2 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.

Based on the evidence provided during the regulatory proceeding, the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

5.0 Conclusion

The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed 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 July 24, 2026, the Board can issue the Permit on July 25, 2026.



Valerie Gordon, Chair
Sahtu Land and Water Board

July 14, 2026

Date