



7<sup>th</sup> Floor - 4922 48th Street,  
P.O. Box 2130, Yellowknife NT X1A 2P6

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

March 17, 2020

File: MV2019C0025  
MV2019L2-0011  
MV2019L2-0012

Mr. Mark Cliffe-Phillips  
Mackenzie Valley Environmental Impact Review Board  
200 Scotia Center  
Box 938, 5102 - 50th Avenue  
Yellowknife NT X1A 2N7

Sent via Email

Dear Mr. Cliffe-Phillips,

**Re: Notice of Preliminary Screening Determination – Application for Land Use Permit  
Mineral Exploration – Lac de Gras Property, NT**

The Mackenzie Valley Land and Water Board (Board) met on March 16, 2020 and considered the Applications from Seabridge Gold (NWT) Ltd. (Seabridge) for Type A Land Use Permit (Permit) MV2019C0025 and for Type B Water Licences (Licences) MV2019L2-0011 MV2019L2-0012 for mineral exploration on near Courageous Lake NT (Project) in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board conducted a preliminary screening based on the Application and 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 Preliminary Screening Report includes the Board's reasons for decision, as required by section 121 of the MVRMA (attached).

If the Board does not receive notice of referral to environmental assessment, it will proceed with the issuance of Permit MV2019C0025 and Licences MV2019L2-0011 and MV2019L2-0012 on Friday March 27, 2020

Our Board and staff look forward to continued communications throughout the pause period. If you have any questions or concerns regarding this letter, please contact Shelagh Montgomery at (867) 766-7457 or email [smontgomery@mvlwb.com](mailto:smontgomery@mvlwb.com).

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mavis Cli-Michaud".

Mavis Cli-Michaud  
Chair, MVLWB

Copied to: Akaitcho/Wek'eezhii East – Distribution List;  
Mr. Brent Murphy – Seabridge Gold (NWT) Ltd.

Attached: Preliminary Screening Report, including Reasons for Decision

**Preliminary Screening Report Form**

<b>Preliminary screener:</b> MVLWB <b>Reference / File number:</b> MV2019C0025 MV2019L8-0011 MV2019L8-0012 <b>TITLE:</b> Mineral Exploration, Courageous Lake, NT <b>ORGANIZATION:</b> Seabridge Gold (NWT) Ltd. <b>MEETING DATE:</b> December 28, 2012 March 16, 2020	<b>EIRB Reference number:</b>
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**Type of Development:**  
(CHECK ALL THAT APPLY)

- |                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | New  |
| <input type="checkbox"/>            | Amend, EIRB Ref. #                                 |
| <input checked="" type="checkbox"/> | Requires permit, licence, or authorization         |
| <input type="checkbox"/>            | Does not require permit, licence, or authorization |

**Project Summary**

The operation will consist of an expansion of exploration activities currently permitted under MV2010C0046 in the Courageous Lake area. Previously permitted and ongoing activities include fuel storage, winter road construction/maintenance, quarrying, and diamond drilling. All activities will take place within 63°50' N and 111°00' W by 64°20' N and 111°30'W.

The maximum amount of fuel stored on site is 75,000 litres, and the maximum number of people on site is 49, housed in Treeline Lodge under an existing Aboriginal Affairs and Northern Development Canada (AANDC) surface lease #76D/3-6. Access to the site is by air or winter road with operations occurring between February and October.

Changes from the MV2010C0046 permit, subject to a Preliminary Screening include the addition of 18 newly staked mineral claims and diamond drilling of approximately 100 holes per year, for a potential maximum of 7 years, totaling 700 holes.

Changes from 2010/2012 Preliminary Screening and Application

2019 - Applications

- As such, the activities also require two Class B water licences; one to authorize use of water on Territorial land and one to authorize use of water on Federal land. Collectively, the water use will not exceed 299 m<sup>3</sup>/day from lakes identified in this application.
- Other related activities that will be undertaken include:
- Use and maintenance, as required, of existing gravel roads, airstrip and laydown areas for equipment laydown, equipment maintenance and storage of consumable supplies;
- Use of existing buildings at Coreland (former Salmita site) for core storage, core logging, and office space;
- Discharge of wastes associated with drilling and core saw-cuttings to land-based sumps;
- Other exploration related activities such as geological mapping, prospecting, rock and soil sampling, geophysical surveys, ecological/environmental monitoring or surveys including the installation/modification of scientific data collecting instruments;
- Use of motorized vehicles on roads, in the quarry and at the airstrip;
- Use of equipment to mobilize drills and supplies overland, when there is sufficient snow;
- Use of snowmaking equipment, as a contingency measure, during low snow years;
- Use of helicopter and fixed wing aircraft;
- Construction of temporary buildings that are <100 m<sup>2</sup> and <5 m high;
- Progressive reclamation activities; and
- Seasonal site closures.

Equipment

Type	Required for Drill Program	Required for Large Drill Program
Number of diesel-powered drills and associated pumps	2 - 3	4 - 5
Estimated number of drill holes per season	20 – 60	100 – 300
Estimated duration of a seasonal drill program	2 - 3 months	3 - 6 months

Estimated diesel consumption for drilling only ( <i>does not include mobile equipment, generators, heat, etc.</i> )	43,200 – 97,200 L	130,000 – 324,000 L
Helicopter – A-Star or equivalent	1	2
Estimated Jet A/B consumption	43,000 – 65,000 L	130,000 – 260,000 L
Snow cats or similar	1 - 2	2 - 3

Type	Required for Drill Program	Required for Large Drill Program
Diesel	80,000 L	310,000 L
Jet A/B	25,000 L	130,000 L
Gasoline	2,000 L	3,000 L

Type	Required for Drill Program	Required for Large Drill Program
Snow cats BR2000 or similar	1 - 2	2
Kubota M108S wheeled Tractor (forks, bucket, backhoe)	1	1
Skid steer, Bobcat 208 or equivalent	1	1-3
ATVs	2 - 3	4 - 6
Snowmobiles	1 - 15	20-30
Wheeled Loader, IT28 or equivalent	1	1
Small dump truck (or dump trailer)	0	1
Wheeled or ski equipped flat deck trailers	2	4
18kW generator and spare	1	2
4 Hp (2 inch) water pump or equivalent	2	2
Stihl gas auger	2	2
D6 Dozer, or equivalent	1	1

Amphibious vehicle – Hagglund BV206 or equivalent	1	1
Oshkosh F2346 (or equivalent) water truck	1	1
Flood pumps, B55 (or equivalent)	6	6
Triaxle Plow truck	1	1
Grader, 14E or equivalent	1	1
Snow making equipment and pumps	0	2
Tractor-trailer transport combinations	As required	As required

**Scope**

- a) Mineral exploration including diamond drilling;
- b) Use of equipment, vehicles, and machines;
- c) Use and Operation of a quarry
- d) Use and storage of fuel; and
- e) Construction, operation and maintenance of winter road and access road

Land Use Eligibility - Section 18 Mackenzie Valley Land Use Regulations

**Type of Disposition**

Disposition Number(s)

Mineral Claims                      2019 - Applications  
K14251,K14252,K14253,K14254,K14255,K14256,K14257,K14258,K16216

Prospecting Permit (s)  
 Mineral Leases                      2019 - Applications  
ML3016,ML3158,ML3159,ML3160,ML3161,ML3219,ML3221,ML3222,ML3223,ML3228,ML3229ML3230,ML3251,ML3357,ML3361,ML3791,ML3792,ML5059,ML5060,ML5061,ML5062,ML5063ML5064,ML5065,ML5066,ML5067,ML5068,ML5069,ML5070,ML5071,ML5072,ML5073,ML5074ML5075,ML5076,ML5077,ML5078, ML5079,ML5080,ML5081,ML5082,ML5083,ML5084,ML5085,ML5086,ML5087,ML5088,ML5089,ML5090,ML5091,ML5092,ML5093,ML5094,ML5095ML5096,ML5097,ML5098,ML5099,ML5100,ML5218,ML5227,ML5228,ML5578,ML5579,ML5580ML5581,ML5582,ML5583,ML5584,ML5585,ML5586,ML5587,ML5588,ML5589,ML5590,ML5591M10306,ML5592,ML5593,ML5594,

- Oil and Gas: EL/SDL/PL
- Quarry Permit
- Timber Permit
- Other:

**Principal Activities (related to scoping)**  
(CHECK ALL THAT APPLY)

- |                                       |   |  |
|---------------------------------------|---|--|
| <input type="checkbox"/> Construction | <input checked="" type="checkbox"/> Exploration | <input type="checkbox"/> Decommissioning |
| <input type="checkbox"/> Installation | <input type="checkbox"/> Industrial             | <input type="checkbox"/> Abandonment     |
| <input type="checkbox"/> Maintenance  | <input type="checkbox"/> Recreation             | <input type="checkbox"/> Aerial          |
| <input type="checkbox"/> Expansion    | <input type="checkbox"/> Municipal              | <input type="checkbox"/> Harvesting      |
| <input type="checkbox"/> Operation    | <input type="checkbox"/> Quarry                 | <input checked="" type="checkbox"/> Camp |
| <input type="checkbox"/> Repair       | <input type="checkbox"/> Linear / Corridor      | <input type="checkbox"/> Scientific      |
| <input type="checkbox"/> Research     | <input checked="" type="checkbox"/> Sewage      | <input type="checkbox"/> Solid Waste     |
| <input type="checkbox"/> Water Intake |   |  |
| <input type="checkbox"/> Other:       |   |  |

**Principal Development Components (related to scoping)**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Access Road<br><input type="checkbox"/> construction<br><input type="checkbox"/> abandonment/removal<br><input type="checkbox"/> modification e.g., widening, straightening<br><input checked="" type="checkbox"/> Automobile, Aircraft or Vessel Movement<br><input type="checkbox"/> Blasting<br><input type="checkbox"/> Building<br><input type="checkbox"/> Burning<br><input type="checkbox"/> Burying<br><input type="checkbox"/> Channelling<br><input type="checkbox"/> Cut and Fill<br><input type="checkbox"/> Cutting of Trees or Removal of Vegetation<br><input type="checkbox"/> Dams and Impoundments<br><input type="checkbox"/> construction<br><input type="checkbox"/> abandonment/removal<br><input type="checkbox"/> modification<br><input type="checkbox"/> Ditch Construction<br><input type="checkbox"/> Drainage Alteration<br><input type="checkbox"/> Drilling other than Geoscientific<br><input type="checkbox"/> Ecological Surveys<br><input type="checkbox"/> Excavation<br><input type="checkbox"/> Explosive Storage<br><input checked="" type="checkbox"/> Fuel Storage<br><input checked="" type="checkbox"/> Topsoil, Overburden or Soil<br><input type="checkbox"/> fill<br><input type="checkbox"/> disposal<br><input checked="" type="checkbox"/> removal<br><input checked="" type="checkbox"/> storage | <input checked="" type="checkbox"/> Waste Management<br><input type="checkbox"/> disposal of hazardous waste<br><input checked="" type="checkbox"/> waste generation<br><input type="checkbox"/> sewage<br><input type="checkbox"/> disposal of sewage<br><input type="checkbox"/> Geoscientific Sampling<br><input type="checkbox"/> Trenching<br><input checked="" type="checkbox"/> Diamond drill<br><input checked="" type="checkbox"/> Borehole core sampling<br><input type="checkbox"/> Bulk soil sampling<br><input type="checkbox"/> gravel<br><input type="checkbox"/> hydrological Testing<br><input checked="" type="checkbox"/> Site Restoration<br><input type="checkbox"/> fertilization<br><input type="checkbox"/> grubbing<br><input type="checkbox"/> planting/seeding<br><input type="checkbox"/> reforestation<br><input type="checkbox"/> scarify<br><input type="checkbox"/> spraying<br><input checked="" type="checkbox"/> re-contouring<br><input type="checkbox"/> Slashing and removal of vegetation<br><input type="checkbox"/> Soil Testing<br><input type="checkbox"/> Stream Crossing/Bridging<br><input type="checkbox"/> Tunnelling/Underground<br><input type="checkbox"/> Other: |
|---|--|

**NTS topographic map sheet numbers:**  
76D/75M

**Latitude / longitude and UTM system:**

63°50' N and 111°00' W by 64°20' N and 111°30'W, NAD83

**Nearest community and water body:**

Wekweti, NT and Courageous Lake, NT

**Land Status (consultation information)**

- Free Hold/Private     
  Commissioners Land     
  Federal Crown Land     
  Municipal Land

**Transboundary/Transregional Implications**

- British Columbia     
  Alberta     
  Saskatchewan     
  Yukon  
 Nunavut     
  Wood Buffalo National Park     
  Inuvialuit Settlement Region  
 Wek'èezhìi     
  Gwich'in     
  Sahtu

**Type of transboundary implication:**     
 Impact / Effect     
 Development

Public concern: Tlicho Government and Yellowknives Dene First Nation

The Tlicho Government submitted comments on December 7, 2012. Comments submitted by the Tlicho Government are categorized into three areas: environmental, cultural, and building relationships and communication. Through the recommended additional conditions, the Tlicho Government's concerns that are within the MVLWB's jurisdiction should be addressed.

The YKDFN submitted comments on December 6, 2012. Comments submitted by the YKDFN were categorized into five areas: caribou protection, community concern, archeology, consultation and outstanding commitments, and enforceability. Through the recommended additional conditions, the YKDFN's concerns that are within the MVLWB's jurisdiction should be addressed.

**Physical - Chemical Effects**

<b>Impact</b>	<b>Mitigation</b>	<b>Location of condition</b>
<b>1) Ground Water</b>		
<input type="checkbox"/> water table alteration		
<input checked="" type="checkbox"/> water quality changes	Proper fuel handling techniques should limit risk of any contamination.  Sealing drill holes that encounter artesian aquifers should mitigate impacts	26(1)(m), 26(1)(f)

- infiltration changes
- other:
- N/A

**Impact**

**2) Surface Water**

- flow or level changes
- water quality changes

**Mitigation**

Proper disposal of waste and handling of fuel should mitigate this concern.

Depositing drill cuttings in a natural depression at least 100 meters from the high water mark of any water course will limit potential for contamination.

A spill contingency plan is in place and will be updated regularly.

2019 - Applications

To protect water quality, property-specific best management practices will be utilized for the duration of exploration activities. Water used during exploration drilling is collected and discharged along with drill cuttings in a sump or natural depression that is located 100 m or more from lakes and watercourses. Drill cuttings from core saws are discharged in a land-based sump at Coreland which is situated on gravel fill. Camp greywater is discharged to a septic field within Surface Lease 76D/3-6-6.

With the location and nature of discharges associated with exploration drilling and camp use, the proposed program is not anticipated to negatively impact water quality in Courageous Lake area waterbodies.

**Location of condition**

26(1)(m), 26(1)(g)

- water quantity changes
- drainage pattern changes
- temperature
- wetland changes/loss
- other:
- N/A

**Impact**

**3) Noise**

- noise in/near water

**Mitigation**

2019 – Applications

Ambient noise levels associated with camp facilities, drilling activities, as well as fixed wing and helicopter operations will be expected to continue at minimal levels for this permit renewal period. Such noise levels are typically short in duration and limited to small areas of the Courageous Lake property.

Periods of exploration activities are anticipated to be from July to October and January to April. The level of activity may consist of up to five operating drills and a maximum of 49 persons on-site at any given time.

Historic activities and on-going exploration in the area are not believed to have created an acoustic impact on wildlife. Continued exploration activities are not expected to significantly change the existing situation.

Seabridge has developed a Wildlife Management and Monitoring Plan which defines mitigations measures to reduce the potential effects of noise. These mitigations include, for example, education of pilots regarding maintaining appropriate setbacks from wildlife, when safe to do so, wherever large animals are observed.

Information shared during TK studies indicate that First Nations people

**Location of condition**

continue to use the Courageous Lake area for contemporary activities. Seabridge will continue to engage with potentially affected parties, as defined in our Engagement Plan, to understand the potential effects of noise from exploration activities, if any, on contemporary activities near Courageous Lake.

noise increase      Ambient noise levels associated with camp facilities, drilling activities, as well as fixed wing and helicopter operations are expected at a minimal level. Noise levels are typically short in duration and limited to small areas of the project site.      n/a

The Proponent will schedule drilling activities to minimize noise impact on wildlife.

- other:
- N/A

**Impact**  
**4) Land**

**Mitigation**

**Location of condition**

geologic structure changes

soil contamination      Proper disposal of waste and handling of fuel should mitigate this concern.      26(1)(m), 26(1)(g), 26(1)(i)

buffer zone loss

soil compaction and settling      Any clearing of vegetation and/or soil compaction will be limited to summer drill sites. Disturbed sites will be re-vegetated.      26(1)(o)

destabilization/erosion      Grading slopes following quarrying activity should mitigate this concern.      26(1)(f)

The Permittee shall not conduct off-road travel in areas without snow-covered surfaces

permafrost regime alteration      2019 – Applications

No significant or long-term impact on permafrost is anticipated from the proposed drilling program.

The standard practice is to complete all drilling on wooden platforms to distribute the weight over the permafrost area in order to better protect it. Drill holes penetrating the permafrost layer will degrade the layer in a local area. However, after abandonment of the site, all conditions that would inhibit the reversal of this degradation will be eliminated.

explosives/scarring

other:

N/A

**Impact**  
**5) Non-renewable natural resources**

**Mitigation**

**Location of condition**

- resource depletion
- other:
- N/A

**Impact**  
**6) Air/climate/atmosphere**

**Mitigation**

**Location of condition**

other: green house gasses      The Permittee will use a forced-air, fuel-fired incinerator to burn all combustible garbage except plastics.      26(1)(i)

2019 - Applications

Due to the small scale and short seasonal nature of exploration activities, it is not anticipated that air quality will be significantly impacted. Local air quality impacts will include minimal dust generation from road and airstrip use; particulates released from the incinerator and emissions from fuel combustion associated with drilling and transportation equipment.

N/A

**BIOLOGICAL ENVIRONMENT**

**Impact**

**1) Vegetation**

**Mitigation**

**Location of condition**

- species composition
- species introduction
- toxin/heavy accumulation
- other:
- N/A

**Impact**

**2) Wildlife and Fish**

**Mitigation**

**Location of condition**

- effects on rare, threatened or endangered species
- fish population changes

If any species at risk are encountered, the Proponent will reduce activity to minimize any effect on these species.

Permittee is to take all reasonable measures to prevent damage to wildlife and fish habitat.

26(1)(h)

2019 - Applications

To minimize the potential for impacts to fish related to water withdrawal (e.g., loss of littoral habitat, loss of overwintering habitat, oxygen depletion), the proposed drilling program will adhere to DFO's Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut (2010). Water will only be withdrawn from lakes that meet the DFO (2010) criteria (Section 7.2.1), no more than 10% of under-ice water volume will be withdrawn from any lake and water intakes will be situated in deep- water locations. Water intakes will be screened and have moderate water velocities to avoid entrainment of fish, as per the Freshwater Intake End-of-Pipe Fish Screen Guideline (DFO 1995).

DFO has not established protocols that limit the withdrawal of water from lakes during open water period. Using the same risk-based approach that was used to define lakes that are applicable for under ice withdrawal Seabridge determined that lakes that are less than 1.5m depth will not be used during open water season. The exception is two lakes north of the east arm of Courageous Lake (Figure 6a, lakes #12 and #13) which have a maximum depth between 1,0 and 1.5 m based on field measurements, which when combined with the large surface area could still be used as a water source, while being sufficiently protecting fish and fish habitat by withdrawing less than 10% of total volume.

DFO has determined that the withdrawal of <10% of instantaneous flow from streams has a low probability of resulting in detectable impacts to ecosystems. Seabridge will assess streams prior to use to assess with natural discharge volume and will continue to monitor flow during use to ensure 10% threshold is not exceeded.

- waterfowl population changes
- breeding disturbance
- population reduction



species diversity change

health changes

behavioural changes

Permittee shall not commence any drilling or movement of equipment within 500 meters of one or more caribou.

26(1)(q), 26(1)(i)

Food handling and garbage disposal methods will be used that do not attract wildlife.

Caribou may avoid area when drilling is occurring. The Proponent will mitigate effects to migrating caribou by placing restrictions on the elevation of helicopter flying and crews will be kept informed of activity so contact with caribou herds is minimal.

The Proponent has installed 60 remote cameras around the project site to help document the movement of wildlife, including caribou.

habitat changes / effects

game species effects

Permittee shall not commence any drilling or movement of equipment within 500 meters of one or more caribou.

26(1)(q)

Caribou may avoid area when drilling is occurring. The Proponent will mitigate effects to migrating caribou by placing restrictions on the elevation of helicopter flying and crews will be kept informed of activity so contact with caribou herds is minimal.

The Proponent has installed 60 remote cameras around the project site to help document the movement of wildlife, including caribou.

toxins/ heavy metals

forestry changes

agricultural changes

other:

N/A

**Interacting Environment**

**Impact**

**1) Habitat and Communities**

**Mitigation**

**Location of condition**

predator-prey

wildlife habitat/ecosystem composition changes

reduction/removal of keystone or endangered species

removal of wildlife corridor or buffer zone

other:

N/A

**Impact**

**2) Social and Economic**

**Mitigation**

**Location of condition**

planning/zoning changes or conflicts

increase in urban facilities or services use

rental house

airport operations/capacity changes

- human health hazard
- impair the recreational use of water or aesthetic quality
- affect water use for other purposes
- affect other land use operations
- quality of life changes
- public concern

YKDFN have expressed concerns related to caribou protection, community concerns related to annual hunt, archaeological sites protection, and consultation issues.

26(1)(j), 26(1)(q)

Tlicho Government has expressed concerns related to the environment (caribou protection), concerns related to annual hunt, archaeological sites protection, and communication from the Proponent.

The Permittee must conduct an Archaeological Impact Assessment prior to disturbing or drilling at any site.

The Permittee must develop an engagement plan to allow for meaningful participation by the YKDFN and the Tlicho Government throughout the life of the permit.

- other:
- N/A

**Impact**

**Mitigation**

**Location of condition**

**3) Cultural and Heritage**

- effects to historic property
- increased economic pressure on historic properties

- change to or loss of historic resources

The Permittee will not operate any vehicle or equipment within 150 meters of a known or suspected historical or archaeological site or burial ground which will limit potential impacts to these sites.

26(1)(j)

The Permittee must conduct an Archaeological Impact Assessment prior to disturbing or drilling at any site.

2019 - Applications

TK studies confirm that the Courageous Lake area was used extensive by local First Nations people, who feel strongly about the cultural and spiritual preservation of archaeological sites. They recommend that these sites be avoided. Seabridge will work with traditional knowledge holders to identify areas that are prospective for archaeological sites that should be further evaluated.

Archaeological sites are also protected by legislation. Of the archaeological sites documented since 2003, six sites are located within 30 m of existing infrastructure, such as gravel roads, and another 17 sites are located within 150 m of existing infrastructure. Seabridge has no current plans to change the existing infrastructure footprint and, therefore, no impacts to these archaeological sites are anticipated.

Seabridge has established an archaeological “no-go zone” constraints map which defines areas where land use activities, such as drilling, are to be avoided and these are communicated and understood by personnel working on site.

Seabridge will continue to conduct pre-clearance surveys prior to drilling, or activities that may cause surface or subsurface disturbance. If there is potential to impact archaeology sites, drill sites will be relocated. To date there are no archaeological sites found to be in conflict with proposed drill pad locations.

Despite pre-clearance efforts, if an unknown site is encountered during exploration Seabridge will follow its Chance Find Procedure (Appendix F) and will notify the Prince of Wales Northern Heritage Centre (PWNHC).

change to or loss of archaeological resources

The Permittee will not operate any vehicle or equipment within 150 meters of a known or suspected historical or archaeological site or burial ground which will limit potential impacts to these sites.

26(1)(j)

The Permittee must conduct an Archaeological Impact Assessment prior to disturbing or drilling at any site.

2019 - Applications

TK studies confirm that the Courageous Lake area was used extensively by local First Nations people, who feel strongly about the cultural and spiritual preservation of archaeological sites. They recommend that these sites be avoided. Seabridge will work with traditional knowledge holders to identify areas that are prospective for archaeological sites that should be further evaluated.

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Seabridge has established an archaeological "no-go zone" constraints map which defines areas where land use activities, such as drilling, are to be avoided and these are communicated and understood by personnel working on site.

Seabridge will continue to conduct pre-clearance surveys prior to drilling, or activities that may cause surface or subsurface disturbance. If there is potential to impact archaeology sites, drill sites will be relocated. To date there are no archaeological sites found to be in conflict with proposed drill pad locations.

Despite pre-clearance efforts, if an unknown site is encountered during exploration Seabridge will follow its Chance Find Procedure (Appendix F) and will notify the Prince of Wales Northern Heritage Centre (PWNHC).

increased pressure on archaeological sites

change to or loss of aesthetically important sites

effects to aboriginal lifestyle

YKDFN are concerned development along the caribou migration route will greatly impact the ability of YKDFN hunters to provide caribou meat for their community and family.

26(1)(q)

Permittee shall not commence any drilling or movement of equipment within 500 meters of one or more caribou.

The Proponent has installed 60 remote cameras around the project site to help document the movement of wildlife, including caribou.

The Permittee must develop an engagement plan to allow for meaningful participation by the YKDFN and the Tlicho Government throughout the life of the permit.

other:

N/A

**Preliminary Screener / Referring Body Information**

Akaitcho IMA Implementation Office	GNWT - Executive and Indigenous Affairs	Manitoba Denesuline
Bathurst Inlet Development Ltd.	GNWT - HSS (Health and Social Services)	New Nadina Explorations Limited
Bathurst Inlet Lodge	GNWT - INF (Infrastructure)	North Slave Metis Alliance
Canadian Northern Economic Development Agency - NWT Region	GNWT - ITI (Industry, Tourism and Investment)	Northwest Territory Metis Nation
City of Yellowknife	GNWT - Lands	NWT & Nunavut Chamber of Mines
Community Government of Behchoko	GNWT - Lands - Hay River Region	NWT- OROGO
Community Government of Gameti	GNWT - Lands - North Slave Region	Salt River First Nation
Community Government of Wekweeti	GNWT - Lands - South Slave Region - Fort Smith	Smith's Landing First Nation
Community Government of Whati	GNWT - MACA (Municipal and Community Affairs)	Snap Lake Environmental Monitoring Agency (SLEMA)
Dene Nation	GNWT - PPCA (Policy, Planning, Communications and Analysis (w/in ITI))	Tlicho Government
Deninu K'ue First Nation	GNWT - PWNHC (Prince of Wales Northern Heritage Centre (w/in ECE))	Tlicho Lands Protection Department
Det'on Cho Corporation	Golder Associates	Town of Fort Smith
Environment and Climate Change Canada	Hamlet of Fort Resolution	Town of Hay River
Fisheries and Oceans Canada	INAC - CARD	Wek' eezhii Renewable Resources Board
Fort Resolution Metis Council	INAC - NWT Inspectors	Wekweeti Community Government
Forward Mining	INAC - Yellowknife	West Point First Nation
GLWB	Katloodeeche First Nation	WLWB
GNWT - ENR (Environment and Natural Resources)	Kitikmeot Inuit Association	Wood
GNWT - ENR - EAM (Environmental Assessment and Monitoring)	Lutsel K'e Dene First Nation – Chief or Wildlife, Lands and Environment	Yellowknives Dene First Nation
NWT - ENR - North Slave Region	Mackenzie Valley Environmental Impact Review Board	
GNWT - ENR - South Slave Region - Fort Smith		

Reasons For Decision

**DECISION**

The Mackenzie Valley Land and Water Board (the Board) is satisfied that the preliminary screening of Application MV2019C0025 MV2019L2-0011 MV2019C0012 – Seabridge Gold (NWT) Ltd. – Mineral Exploration has been completed in accordance with section 125 of the *Mackenzie Valley Resource Management Act (MVRMA)*.

The Board is satisfied that communities and First Nations affected by the Application have been notified and provided adequate time to provide comment on the Application as required by land claim and self government agreements, the MVRMA, policy directions relating to Interim Measures Agreements, and any other applicable legislation and agreements.

Having reviewed all relevant evidence on the Public Registry, including the submissions of the Applicant, the written comments received by the Board and any Staff Reports prepared for the Board, the Board has decided that in its opinion:

- The proposed development will not have a significant adverse impact on the environment; and
- The proposed development is not a cause of public concern.

The Board is also of the opinion that the Application can proceed through the regulatory process and that any impacts of the development on the environment can be mitigated through conditions of a land use permit.

	Preliminary Screening Decision
<input checked="" type="checkbox"/>	<b>Outside Local Government Boundaries</b>
<input type="checkbox"/>	The development proposal might have a significant adverse impact on the environment, <i>refer it to the EIRB.</i>
<input checked="" type="checkbox"/>	<i>Proceed with regulatory process and/or implementation.</i>
<input type="checkbox"/>	The development proposal might have public concern, <i>refer it to the EIRB.</i>
<input checked="" type="checkbox"/>	<i>Proceed with regulatory process and/or implementation.</i>
<input type="checkbox"/>	<b>Wholly Within Local Government Boundaries</b>
<input type="checkbox"/>	The development proposal is likely to have a significant adverse impact on air, water or renewable resources, <i>refer it to the EIRB.</i>
<input type="checkbox"/>	<i>Proceed with regulatory process and/or implementation.</i>
<input type="checkbox"/>	The development proposal might have public concern, <i>refer it to the EIRB.</i>
<input type="checkbox"/>	<i>Proceed with regulatory process and/or implementation.</i>

**Preliminary Screening Organization**

Mackenzie Valley Land and Water Board

March 16, 2020

**Signatures**



Mavis Cli-Michaud, Chair