



EAGLE GOLD PROJECT

TRAFFIC MANAGEMENT PLAN

Version 2017-01

JULY 2017

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DOCUMENT CONTROL

Submission History

Version Number	Version Date	Document Description and Revisions Made
2013-01	Sep 2013	Original submission to the Department of Energy, Mines and Resources in support of an application for a Quartz Mining Licence allowing for preliminary construction activities
2015-01	Mar 2015	Revisions made in support of an application to the Department of Energy, Mines and Resources in support of an application for a Quartz Mining Licence allowing the full Construction, Operation and Closure of the Project.
2017-01	Jul 2017	Revisions made to reflect the current site general arrangement and submitted to the Department of Energy, Mines and Resources in advance of Project Construction.

Version 2015-01 of the Traffic Management Plan (the Plan) for the Project has been revised in July 2017 to update Version 2015-01 submitted in March 2015. The table below is intended to identify modifications to the Plan and provide the rationale for such modifications

Version 2017-01 Revisions

Section	Revision/Rationale
Section 1.3 Legislative and Other Requirements	<ul style="list-style-type: none"> Revised section to include regular monitoring to meet requirements of QML-0011 and, if warranted, amend the Plan to reflect changing conditions or uses of the roads.
Figure 2.1-1 Project Access	<ul style="list-style-type: none"> Updated with optimized site footprint
Section 4.4 Signage	<ul style="list-style-type: none"> Revised section as required by QML-001 to include signage and radio notification of blasting activities to Haggart Creek Road Users.
Section 3 Traffic Volume	<ul style="list-style-type: none"> Verified/updated traffic volume estimates for consistency with the optimized Project construction and operation plans and schedule.

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1 INTRODUCTION

1.1 PROJECT SUMMARY

StrataGold Corporation (SGC), a directly held wholly owned subsidiary of Victoria Gold Corp. has proposed to construct, operate, close and reclaim a gold mine in central Yukon. The Eagle Gold Project ('the' Project) is located 85 km from Mayo, Yukon using existing highway and access roads. The Project will involve open pit mining and gold extraction using a three stage crushing process, heap leaching, and a carbon adsorption, desorption, and recovery system over the mine life.

1.2 SCOPE AND OBJECTIVES

The objective of this Traffic Management Plan is to describe the procedures and protocols for the use of the Haggart Creek and South McQuesten Roads and site traffic during the life of the Eagle Gold Project. The plan provides estimated traffic volumes by vehicle type, communication protocols for Project traffic and public users of the access road, and plans for management of dust, wildlife interactions, incident response and complaints.

Public, employee and contractor safety is the primary objective of this plan. SGC recognizes that the Silver Trail is used by other industrial and public users, and that the South McQuesten and Haggart Creek Roads are used by the public. Public use of the access road varies considerably seasonally with a relatively short placer mining and summer season. SGC is also aware of the seasonal usage of the South McQuesten and Haggart Creek Roads for hunting, fishing and traditional uses. The safety of these users is a special consideration when public traffic increases during summer and fall.

Access road upgrades and construction details are presented in the Road Construction Plan submitted to Yukon Government Energy Mines and Resources as required by the Quartz Mining License.

1.3 LEGISLATIVE AND OTHER REQUIREMENTS

This Traffic Management Plan has been prepared in accordance with the Yukon Government Decision Document terms and conditions. The Yukon Government Decision Document was issued in April 2013 pursuant to the *Yukon Environmental and Socio-Economic Assessment Act* and includes terms and conditions that encompass commitments made by SGC as part of the environmental assessment completed by the Yukon Environmental and Socio-Economic Assessment Board (YESAB) in April 2013. Commitment #110 from Appendix A of the YESAB screening report states that SGC will develop and implement a Traffic Management Plan.

The use and management of the SMR and the HCR will be regularly monitored as required by the Quartz Mining Licence in order to meet SGC's annual reporting requirements, and if warranted, the Plan will be revised to reflect changing conditions or uses of the roads.

No other legislation or regulations require a traffic management plan for the Project.

2 SITE ACCESS

The proposed Project is located in central Yukon approximately 350 km north of Whitehorse, and 85 km by road north of the Village of Mayo.

Access to the Project site from Highway 11, the Silver Trail Highway will be via the existing South McQuesten Road (SMR) and the Haggart Creek Road (HCR). Together, the SMR and HCR comprise a 45 km road, which is divided by the South McQuesten River. The section of the road between the Silver Trail and the South McQuesten River is referred to as the SMR (km 0 to 22.9), whereas the section of the road between the river and the mine site is referred to as the HCR (km 23 to 45).

Both roads are public roads, regulated under the *Yukon Highways Act*; however, the SMR is maintained during summer only by the Yukon Government Department of Highways and Public Works (HPW), whereas the HCR is considered a “public unmaintained” road.

Figure 2.1-1 depicts the existing alignment of the SMR and HCR. The site secondary roads will tie into the HCR. There will be a gate and guardhouse located at the site entrance to restrict unauthorized access.

2.1 ACCESS ROAD DESIGN

Currently the average width of the HCR is greater than a single lane but less than a standard two-lane road in most locations. SGC will complete a number of upgrades so that the HCR will be a two-way one-lane radio controlled access road.

In 2009, Yukon Government Highways and Public Works (HPW) upgraded the SMR by completing brushing, grading, culvert installation, and miscellaneous drainage improvements. Additional upgrades of the South McQuesten Bridge abutments were completed in August 2010. In August 2013, HPW upgraded the Haldane Creek Bridge and it is currently rated for 63.5 tonnes. The South McQuesten Bridge is currently rated for in maximum allowable gross vehicle weight of 40 tonnes for 4 or more axles and 35 tonnes for 3 axles at -35°C. Further upgrades to the South McQuesten Bridge are required prior to construction to meet the projected load and volume estimates for the construction and operations phases.

The following upgrades are proposed for the HCR in support of the Project and will be conducted in accordance with permit terms provided by HPW and best management practices:

- Upgrade from the existing one to two lane unimproved resource road to a two-way single-lane radio controlled resource access road
 - Construction of pullouts as required along the grade to allow vehicles moving in opposite directions to pass each other and for vehicles to stop if necessary
- Right of way clearing 15 m on each side of road centerline to increase sight lines for the safety of the vehicles as well as to allow more light and air movement to reach the road surface to aid in the melting or drying of the road bed
- Drainage improvements
 - Installation of new and maintenance of the existing ditching along the roadway to ensure adequate drainage

- Repair and replacement of damaged or undersized culverts as well as the installation of additional culverts in selected areas to improve the drainage of the road bed.
- Where required, importing fill and raising the road grade through select areas
- Minor realignments for safety improvements
- Construction of a gravel parking area at the South McQuesten River for recreational users as requested by the FNNND

After the upgrade, the width of the HCR will be approximately 5 m throughout. The 5 m width will include a single 3 m wide travelled road lane with two 1 m wide shoulders. The design considered specific geometric parameters and Transportation Association of Canada (TAC) design standards for Low Volume Roads (LVR 50), as well as acceptable engineering practices for two-way one-lane access roads. Proposed upgrades will be subject to final review and acceptance by the Yukon Government Department of Highways and Public Works (HPW) and in accordance with work within the right of way permit terms and conditions.

2.2 ACCESS ROAD MAINTENANCE

Road maintenance is essential to ensure user safety, preserve the existing condition of the road, and ensure convenient and efficient travel to the site. Roads that are not properly maintained are susceptible to failure from vehicular and environmental impacts. The SMR is maintained during summer only by HPW, whereas the HCR is considered a “public unmaintained” road. SGC understands that HPW will maintain the SMR throughout the life of the Project.

Maintenance of the HCR is currently being completed by SGC independently of the Project to support year round exploration activities and is undertaken in accordance with existing permits. SGC will continue to maintain the HCR throughout the life of the Project for safe travel including drainage improvements, resurfacing, brush clearing within the right of way, etc. Snow clearing of both roads will be completed by SGC.

Maintenance of the HCR will occur on a routine basis as road conditions dictate. The HCR is used for access to local placer mining operations and maintenance of this road will be made in an effort to accommodate access by local users however, the primary objective is for the safety of employees, contractors and Project related traffic.

The road maintenance schedule will include (but not be limited to):

Summer/Fall Months:

- ensuring culverts are delineated prior to snowfall to prevent snow plow damage and location for steaming in winter;
- removal of deadfall and brushing along the cleared right-of-way;
- repairing potholes and ruts and re-blade washboard areas;
- ensuring that there is proper drainage off the road structure;
- ditches pulled where needed and are clear and clean of obstructions;
- culverts are operating and draining properly.

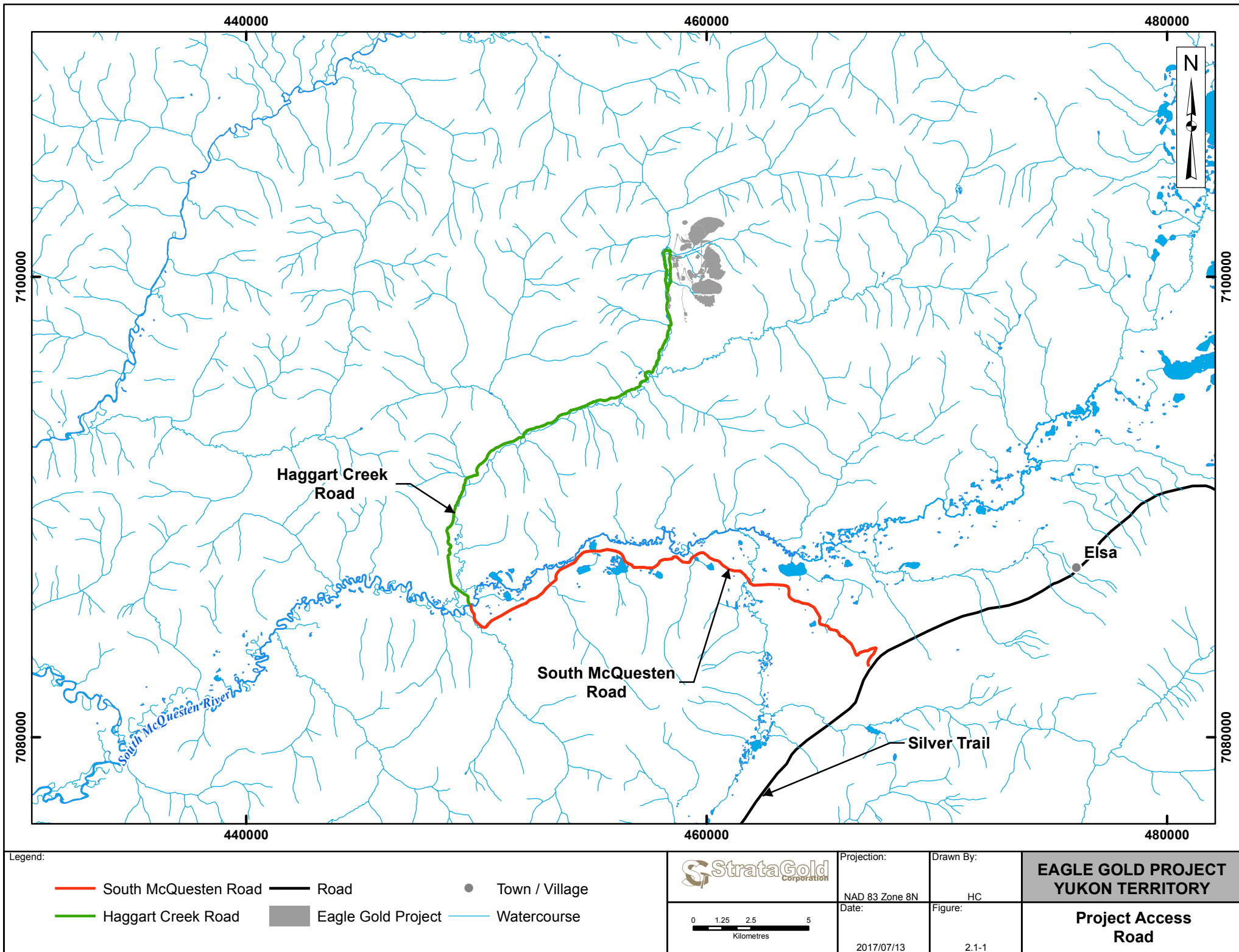
Winter/Spring Months:

- removal of snow from the driving surface and pullouts;
- where required sanding and scarifying the road surface;
- ensuring that there is proper drainage off the road structure;
- steaming of culverts as required to maintain adequate flow.

In addition to the seasonal maintenance requirements, the following will be maintained on an “as needed” basis:

- replacing unreadable kilometer signs;
- road signage;
- identification and reconstruction of road structure failure (e.g. washouts);
- removal of large rocks that may have fallen onto the road surface or been bladed up during the reshaping;
- replacement of any material that has washed out as a result of spring runoff.

Road maintenance, including installation of signs, will be conducted in accordance with HPW permit conditions and signage requirements.



3 TRAFFIC VOLUME

The HCR is a public unmaintained road under the *Highways Act*. Although traffic volume data along the HCR is unavailable, the current traffic volume is relatively low. There is less traffic volume on the SMR and HCR than the Silver Trail (Highway 11). Use of the Silver Trail and SMR is currently well below their respective capacities and the HPW has indicated that the predicted level of Project traffic is insignificant in terms of affecting the publicly maintained roadways along the access route (Silver Trail and SMR), and can be accommodated. Therefore, the Project is not expected to result in significant adverse impacts to the road infrastructure along the Silver Trail and the SMR.

Employees from surrounding communities will be driven to Mayo by a transfer van service. Employees from outside the local area will be flown in from Whitehorse to Mayo. Mine site workforce will temporarily stage in Mayo and be transported by bus to the Project site.

During construction, increased vehicle and truck traffic will utilize the SMR and HCR. The largest vehicles anticipated will be A-Trains, trucks with long loads (steel members, crane components), and trucks with wide loads (truck boxes, tanks, pre-fabricated camp modules). Loads will be adjusted for seasonal load restrictions.

Estimated traffic volume during construction is:

- 2,500 total semi-trailer round-trips
- 7,500 to 10,000 total pickup truck (<5 tonne truck) round-trips (10 to 20 pickup truck round-trips per day on average during peak construction)
- 10 passenger car or pickup trucks per day during peak construction

Estimated traffic volume during operations:

- Crew shift changes are expected to occur every two weeks. Personnel will travel from Mayo to the mine site by bus. This will involve approximately 100 – 120 bus roundtrips per year
- Total truckloads are estimated at 3,000 trucks per year (round-trips). As with the estimate for the construction phase, these numbers do not account for seasonal load restrictions, which will determine seasonal differences in truck traffic volumes (e.g. likely increased traffic prior to and after spring load restrictions).

3.1 TRADITIONAL USE TRAFFIC

The South McQuesten Bridge is a known destination for grayling fishing in the spring and is also used to access the river for hunting. Comments received during the Public Comment Period of the Environmental Assessment indicate that the South McQuesten River is a prime grayling fishing area and that the area is an important First Nation fishery. Comments also indicate that the area along the access road and the Project site is accessed for moose hunting by the First Nation and other hunters. The First Nation of Na-cho Nyäk Dun (FNNND) has expressed a desire to engage in fishing at the South McQuesten Bridge. SGC has committed to constructing a cleared parking area north of the bridge to provide additional recreational parking.

4 TRAFFIC CONTROL

The SMR will continue to be a two lane, two-way road that will not be radio controlled. Whereas the HCR will be a two-way one-lane radio controlled access road. SGC will implement the following general best management practices and procedures to maximize road and transport safety:

- Implement radio control on the HCR after the South McQuesten Bridge
- Restrict the use of personal vehicles by Project employees and require Project related traffic to use appropriate vehicles (e.g. transport buses, rental vehicles, etc.)
- Transport drivers will be briefed on significant route characteristics regularly and when changes to access route conditions dictate
- Restriction of non-essential travel during inclement weather
- Maintain the entire length of the access road through collaboration with HPW
- Post speed limits for Project vehicles in accordance with HPW permit conditions and signage requirements
- Ensure Project related drivers have appropriate driver training, radio contact capabilities, vehicle maintenance requirements, and spill response capabilities as appropriate
- Ensure hazardous materials are transported and handled in accordance with the *Transportation of Dangerous Goods Act and Regulations*
- Require bulk carriers to carry two-way radios to communicate with other road users
- Identify wildlife migration corridors and crossings along the road and provide signage in high risk areas
- Plow wildlife crossing and escape points in the access road snow banks (i.e. at least every 0.5 km of less than 0.5 m bank height)
- In accordance with the *Occupational Health and Safety Regulations* for public roads, require the use of flashing devices on vehicles/machinery and equipment that will cross, travel on or may otherwise pose a risk to users of public roads.

4.1 RIGHT OF WAY STANDARDS

The following standards, in order of highest to lowest priority, apply to rights-of-way at any area not controlled by traffic signs:

- Emergency vehicles—when lights flashing
- Trucks transporting dangerous goods (TDG):
 - Explosives transport vehicles
 - Reagent transport trucks
 - Fuel trucks

- Other TDG trucks
 - Haul trucks
 - Bulk carriers (non-TDG)
 - Heavy equipment—from large to small
 - All other vehicles

When two comparable trucks/vehicles (e.g., two loaded/unloaded fuel trucks) meet, the blind side vehicle has the right-of-way. Generally, Project vehicles must yield to public vehicles unless road conditions/location would make this unsafe.

Passing is permitted only when safe to do so. Radio or visual contact must be made before passing any heavy equipment.

4.2 SPEED LIMITS

Speed limits will be enforced for mine traffic and posted along the access and site roads and in accordance with HPW permit conditions and signage requirements. The following are maximum speed limits in optimal conditions. Employees will be reminded to drive to road conditions and not take chances in adverse situations or inclement weather.

- Access Road to Site (HCR and SMR):
 - Maximum = 50 km/hr as established by the *Yukon Highways Act*
 - Blind corners and bridge crossings = Project vehicle speed reduced to 20 km/hr
- Site Roads
 - Ore and Waste Rock Haul Roads = 50 km/hr
 - Secondary site access roads = 50 km/hr unless posted otherwise
 - Parking lots = 15 km/hr
- Trailing vehicles and heavy equipment = Light vehicles will follow the established highway standard of the three-second rule when following any equipment or vehicle (e.g. allow for a safe distance equivalent to three seconds of vehicle progress at the current rate of speed).

4.3 COMMUNICATION

4.3.1 Public Notice

SGC anticipates that any road maintenance/upgrades will require only single-lane temporary / short term closures. Signage warning of construction activities on the roadway will be placed at appropriate distances from the construction/maintenance sites, in consultation with HPW. For significant upgrade/maintenance events requiring more than one day to complete, HPW will be notified and public notice will be issued to the Village of Mayo and the FNNND for posting if deemed necessary by community leadership.

Public notices will be posted at multiple locations in Mayo to communicate any planned road closures or large loads that will travel to site. SGC will also contact local users, the Village of Mayo, and the FNNND to notify of the start of Project construction and operations so that public users are aware of changes in traffic volume and type.

4.3.2 Radio Control

SGC will establish radio coverage along the entire site and length of the HCR and SMR access roads. The frequency will be used on Project fleet radios and provided to contractors, suppliers and bulk carriers for radio programming.

SGC will also establish a FM or AM frequency for public users that do not possess radios or that have not programmed the SGC frequencies prior to first use of the road. This will enable non-radio users to listen to traffic using the HCR to understand the location of vehicles to know when to use pullouts or to adjust speed. SGC will post the FM frequency established for the Project at the SMR and Silver Trail Intersection for the information of public users.

4.3.2.1 Radio Procedures

Single lane radio controlled roads with industrial traffic present potential hazards unique from two lane roads and highways. Potential hazards on radio controlled include:

- Not pre-programming radio frequency on radio prior to trip (cannot be done by user at roadside)
- Losing track of location
- Losing track of oncoming vehicle location
- Vehicles not using radio calling
- Not following calling procedure
- Unnecessary radio chatter and talking over other calls
- Inadequate signage (missing km markers)
- Radio dead zones

At the start of construction, SGC will require that Project road users utilize a radio calling protocol that enables safe usage of vehicle traffic while on the HCR and SMR. Drivers will be required to announce: their vehicle type, location, and direction at the time they enter or exit the roadway; and stopping or parking, and when they resume. Drivers will also announce every non-radio user they observe so that other traffic is aware of and can take appropriate precautions of non-radio users on the HCR and SMR.

4.3.2.2 Radio Calling Protocol

- 1) “Up” and “Down” used to identify the direction of travel.
 - Up = assigned to direction to site and increasing kilometre numbers
 - Down = assigned to direction from site and decreasing kilometre numbers
- 2) Project vehicles travelling on the HCR must identify themselves; pick-up, low-bed, fuel truck, grader, etc., (i.e. “pick-up 15 Down”, “grader 20 Up”).
- 3) Calling protocol for vehicles:
 - Up vehicles call every EVEN km, unless posted otherwise
 - Down vehicles call every ODD km, unless posted otherwise
- 4) Must call situations
 - When leaving and entering the road
 - At posted “must call” signs
 - When stopping and parking on the road, and again when travel resumes
 - When encountering large wildlife on or adjacent to the road (bear, moose, wolf)
 - When encountering a vehicle traveling without a radio
- 5) Only pass a vehicle once the slower vehicle has safely exited onto a pull-out. If required to pass a vehicle at a location other than a pull-out (e.g. heavy equipment performing road maintenance) the driver must first make radio or visual contact with the vehicle being passed and receive “OK” to do so.
- 6) Fuel trucks, wide loads and loaded bulk carriers have the right of way; light duty vehicles or empty trucks must yield using pullouts unless otherwise agreed to via radio with opposing traffic.
- 7) Convoy calling (two or more vehicles) is allowed:
 - The lead vehicle is responsible for calling for all vehicles in the convoy
 - It is the responsibility of the vehicle joining or leaving the convoy to inform and to receive confirmation from the lead vehicle.
 - A vehicle more than 2 km behind the lead vehicle is no longer part of that convoy and must call their own position.
 - A lead vehicle shall not call for vehicles more than 1 km behind them or each other.
- 8) Avoid distractions while monitoring the road channel.
 - No unnecessary radio chatter that occludes other users calling
 - Avoid noise distractions that prevent hearing radio calling (loud music, headphones, passengers etc.).
- 9) Stay on designated road channel at all times while traveling.

- 10) The HCR radio channels are for traffic management purposes only. Conduct all other communication on a non-HCR radio channel when not travelling on the HCR.

4.3.2.3 Public Non-radio Users

Public traffic that do not have radios will be instructed on safety rules for the HCR and SMR via signage at the start of the SMR indicating the following:

- FM/AM radio frequency for station that provides traffic communication for the access road
- Mandatory use of headlights during night and daylight hours
- Observance of the 50 km/hr speed limit and slower speeds around corners or during times of reduced visibility to allow for sufficient time to stop in case of an on-coming vehicle
- Use of the pullouts to allow passing of opposing traffic
- Maintaining distance between any other vehicle moving in the same direction to avoid airborne debris.

Non-radio users may be temporarily restricted from using the road in special circumstances, such as if an extra-large vehicle which cannot use the pullouts is on the road. When a Project vehicle is anticipated to require the temporary restriction of use by non-Project related traffic, it will be accompanied by both a front and rear pilot vehicle. The front pilot vehicle will proceed in advance of the Project vehicle requiring guidance to the closest section of the road that has sufficient clearance for passing and temporarily halt oncoming traffic. Once restricted access has been secured by the front pilot vehicle, the Project vehicle requiring guidance will proceed to the restricted access location with the rear pilot vehicle securing assistance from the other direction at the prior restricted access locations. This process will continue until safe ingress or egress to the Project site has been confirmed. Non-radio users will also be informed that they must yield to Project vehicles that would have difficulty reversing direction on the access road.

4.4 SIGNAGE

Kilometer markers are installed along the entire length of the HCR beginning at the South McQuesten Bridge and ending at site. Stop signs will be used at points of ingress and egress to public roads. Speed limit signs will be posted at regular intervals and at required locations to indicate changes for slower speeds around turns, at bridge crossings or at known wildlife corridors as determined through monitoring.

An entrance sign will be installed where the two-lane public road changes to the radio controlled single lane HCR at the South McQuesten Bridge. A pullout in front of the sign will allow for the user to stop and safely read it. The sign will include the road name, speed limits, VHF radio channel frequency, FM radio frequency, calling protocol, load restrictions, primary user name (SGC), and SGC contact phone numbers. This sign will also provide guidelines for non-radio users listed above.

Speed indicator signs may be used if required to enforce and encourage the observance of speed limits. Signage installed on public roads will be in accordance with HPW permit terms and signage regulations.

Signs will be installed on the HCR at points outside of the 1.5 km boundary identified in the Noise Assessment Report, that include warnings and information relating to blasting activities including time of day and frequency of blasting. Radio frequencies will be used to notify HCR users of blasting activities.

4.5 VEHICLE INSPECTIONS

To ensure vehicles that are part of the SGC fleet which are used by multiple drivers remain in safe operating condition, a pre-trip inspection will be performed daily. Each vehicle will be equipped with a logbook to record inspections and regular maintenance. The inspection checklist will include the following and list whether the condition is ok or requires action and the date the action was completed if required:

- Maintenance and service
- Radio
- Housekeeping
- Glass and mirrors
- Lights, signals, horn and buggy whip
- Fluid levels
- Tires (incl. spare)
- Body damage
- Safety and First Aid Kit
- Spill Kit
- Fire extinguisher
- Wheel chocks

4.6 PARKING

All vehicle, truck, and heavy equipment operators are responsible for parking their vehicle in a safe manner. When leaving the vehicle unattended, the operator must ensure that the transmission is in park or in the case of a manual transmission, in reverse. The use of wheel chocks are mandatory for vehicles on site. Mobile equipment greater than 7,000 kg will be equipped with two wheel chocks which will be used each time the vehicle is parked.

When parking on a grade, if safe and practical to do so, the vehicle should be parked perpendicular to the grade. If this is not possible, the operator must ensure that the vehicle is properly parked and secured.

When parking on a grade, the vehicle should be parked as close to the side of the road as is safely practical. The steering wheel should be turned as much as possible to the right (toward the side of the road). When vehicles are being parked, adequate clearance from other equipment and vehicles must be maintained. Vehicles left idling and unattended must have the parking brake applied. Back-in parking will be practiced whenever possible.

5 ACCIDENT PREVENTION

5.1 EMPLOYEE TRAINING

New employees are required to review the Traffic Management Plan and Emergency Response Plan as part of the employee induction training at the beginning of their employment. Subsequently, each employee is required to review the Traffic Management Plan every 36 months and the Emergency Response Plan every 12 months or more frequently if plans are updated.

5.2 CONTRACTORS AND VISITORS

Contractors will be required to review the Traffic Management Plan and Emergency Response Plan as part of the contractor induction training. Visitors will receive an orientation during check-in that will provide an overview of the Road Rules and Emergency Response Procedures amongst other information.

5.3 FOLLOWING EQUIPMENT AND OTHER VEHICLES

To determine the right following distance, drivers should select a fixed object on the road ahead such as a sign, tree or overpass. When the vehicle ahead passes the object, slowly count "one one thousand, two one thousand, three one thousand." If you reach the object before completing the count, there is not adequate distance between vehicles.

In inclement weather, high dust conditions or at night the three-second rule should be doubled to six seconds, for added safety. If the weather conditions are very poor, e.g. heavy rain, heavy fog, or heavy snow, start by tripling the three second rule to nine seconds to determine a safe following distance.

5.4 ESCORT VEHICLES

Escort vehicles and/or convoys may be used for trucks transporting dangerous goods (e.g. sodium cyanide, reagents, fuel, etc.) when deemed necessary by SGC site operations particularly in inclement weather. Drivers will contribute to maintaining up-to-date information on any changes in route conditions, circumstances, or risk by reporting observed changes after each trip along the entire transportation route including the Silver Trail Yukon Highway 11, the SMR and the HCR.

5.5 WILDLIFE PROTECTION

SGC is committed to the protection of wildlife and has implemented a Wildlife Protection Plan pursuant to the *Quartz Mining Act*. Wildlife protection measures included in the Wildlife Protection Plan that pertain to use of the access road and vehicle traffic are summarized below.

Wildlife may interact with vehicles as they take opportunistic advantage of the relatively easy access route provided by the plowed access road during winter. Consequently, winter is considered the highest risk season due to the potential for the snow banks on the plowed road making it difficult for moose and other wildlife to leave the road to avoid traffic. In addition, moose may run significant distances on the road to avoid vehicles, expending valuable winter energy reserves, in attempts to find escape options from the access road. Both collisions and the expenditure of energy may increase their risk of mortality during winter months.

Animal behavior is related to the “fight-or-flight response”. There is a certain amount of space in which an animal feels safe; but once that boundary is violated, the animal’s reaction is unpredictable. Even if an animal sees the vehicle, it may still jump in front of the vehicle. If an animal has crossed the road, it may turn and cross again. Animals standing calmly at the side of the road may bolt unexpectedly. Therefore drivers must slow down or stop if an animal is observed on the access road and wait to proceed until the animal has cleared the road and right of way and is safe to pass.

SGC commits to the following measures to mitigate the potential effects of Project-related traffic on wildlife resources and prevent wildlife collisions:

- Reduce personnel traffic on the access road by implementing an employee travel policy that prohibits the use of personal vehicles without prior approval and requires employees and contractors to utilize SGC provided charter transportation to and from the Project site.
- Facilitate wildlife movement by:
 - a) providing wildlife crossing and escape points in the plowed snow banks along the access road (escape points will be cut into snow banks at regular intervals between every kilometer marker);
 - b) providing wildlife crossing points along extensive open ditches; and,
 - c) providing direction to Project staff and contractors on methods to avoid interference with the movement of wildlife across roads.
- Promote proactive radio communication among users of the access road to convey safety information, including sightings of large wildlife species along the road.
- Provide and maintain signage where wildlife encounters are most likely to occur (e.g. blind turns, obstructed views, water crossings, etc.), reminding drivers to be vigilant for wildlife and to give wildlife the right of way.
- Report collisions and carcasses of ungulates and other large animals observed on the Project site and along the access road to the Environmental Manager, Mine Manager or designate(s) as soon as possible to ensure prompt removal. Near misses and collisions that result in the death or injury of an ungulate or other large animal must be reported as soon as possible. Measures will be developed in coordination with overall road planning with HPW if required.
- Implement a maximum speed limit for Project related vehicles of 50 km/h on the access road to minimize dust and reduce wildlife collisions.

5.6 DRIVER FATIGUE

Travel to and from the Project site by employees and contractors will be regulated so that the number of driving and rest hours are managed properly to prevent fatigue, drowsiness and falling asleep at the wheel.

Long-term measures, such as schedule planning, coupled with short-term strategies such as naps and short breaks, are the most effective means of reducing accident risks. Long-term planning is the responsibility of logistics managers and dispatchers. Short-term strategies are the responsibility of drivers. They must, however, be given the opportunity to incorporate them into their schedule.

Drivers are responsible for taking short-term action. At the first signs of fatigue, they should stop and rest. Driving in extreme weather requires taking short breaks in a location with the best conditions. During such breaks, drivers should take advantage of the opportunity to take a nap, stretch their legs and perform a few simple physical exercises.

Fatigue management requires that drivers are well rested and fit to operate a vehicle. Driving fitness requires a driver and carrier to behave in a manner that minimizes the risk of fatigue-related accidents. SGC will ensure that contractors whom they do business with introduce policies, procedures and practices to ensure that drivers are properly rested and ready to drive safely.

6 INCIDENT RESPONSE

SGC has a detailed Emergency Response Plan and Spill Response Plan and has developed several protocols for specific emergencies on the road including minor/major accident, spills, fire/flooding, road closure etc. A current copy of the Emergency Response Plan and Spill Response Plan will be available in company vehicles and offices. An active, well-trained Emergency Response Team and emergency response vehicles will be based at the Project site ensuring appropriate emergency response and spill contingency training and knowledge. Equipment, materials, and procedures will be maintained to limit the consequence of releases to the Environment through prompt containment and clean-up.

Project-related vehicles will be equipped with as a minimum - VHF radio, safety cones, danger tapes, spill kits, fire extinguishers, and first aid kits. Stationary spill kits will be placed at key points along the road and maintained and inspected on a regular basis. Details are provided in the Spill Response Plan.

Response protocols will be established with local Emergency Responders from Mayo, Dawson and Whitehorse. SGC will ensure that Emergency Responders are adequately trained for a response to specialized products unique to the Project.

7 COMPLAINT MANAGEMENT

SGC has a site operations telephone number (778) 372-2758 advertised to the public via the Victoria Gold website, this plan and public notices such as the Potato Hills Press. This telephone number is equipped with voicemail and provides a mechanism by which complaints and general enquiries regarding environmental or community issues associated with operational activities can be directed. All complaints whether received via the hotline or directly to SGC personnel will be documented and entered into complaint tracking database for follow up. Complaints regarding traffic or access road condition will be immediately forwarded to the relevant Company representative for follow up as required. Complaints will be handled by keeping record of all complaints showing:

- The date and time of the complaint
- The method by which the complaint was received
- The personal detail of the complainant which were provided by the complainant and if no details were provided a note to that effect
- The nature of the complaint
- The action taken including any follow up contact
- If no action is taken the reason why no action was taken

The number and category (traffic, road condition, dust, etc.) of complaints will be reported monthly to Senior Management and a summary of complaints for the year will be reported in the Annual Report as required by Energy Mines and Resources.

8 ROLES AND RESPONSIBILITIES

It is the responsibility of employees and contractors to undertake practices to manage and minimize traffic incidents according to this Traffic Management Plan.

The Project/Mine Manager is responsible for coordinating the implementation of this Management Plan and for the periodic review of the Plan. The Mine Manager will be responsible for ensuring the commitments of the Plan are met including:

- 1) Enforcement of the procedures and speed limits described in this plan
- 2) Notification of key stakeholders when large loads are required to be transported, or road closures are to occur; and
- 3) Production and dissemination of reports.

The Health and Safety Manager is responsible for coordinating the training of employees and contractors with regards to their responsibilities under this plan.