



KUDZ ZE KAYAH PROJECT

TRAFFIC MANAGEMENT PLAN

REV 02

June 2026

BMC MINERALS LTD.

This Management Plan has been developed to meet the appropriate subject objectives based on existing regulatory requirements, current or planned site activities, existing and expected site conditions, and designed outcomes at the time of writing. Operational processes/practices for achievement of licence terms and conditions may be updated from time to time as appropriate due to changes to relevant legislation and regulations, changes to site activities or conditions, differences from expected objective outcomes, or improvement of management practices. All rates, capacities, dimensions, weights, volumes and durations in text or figures are based on current feasibility level designs and are subject to change based on final design, licence conditions or site conditions encountered. Updates will be resubmitted to government authorities and/or stakeholders as required.

LIST OF REVISIONS

Issue Date	Revision Number	Description
January 2, 2024	Rev 00	For issue to EMR
August 8, 2024	Rev 01	Updated in response to EMR Information request dated May 24, 2024
June 1, 2026	Rev 02	Administrative updates in response to EMR completeness check, and minor updates to reflect Term 49 in the YESAA Decision Document dated April 10, 2026.

SUMMARY OF REVISIONS

Information Request/Intervention	Document	Exhibit	Section	Revision
Revision 01				
EMR IR: Include Decision Document Condition 42.	Traffic Management Plan	N/A	1.2.3	Added the condition to Section 1.2.3 and Section 4.1

LIST OF ACRONYMS

BC	British Columbia
BMC	BMC Minerals Ltd.
BST	Bituminous Surface Treatment
ELD	Electronic Logging Devices
FCHOC	Finlayson Caribou Herd Oversight Committee
hr	Hour
HRPP	Heritage Resource Protection Plan
kg	kilogram
km	Kilometre
KZK	Kudz Ze Kayah
masl	Metres above sea level
NSC	National Safety Code
PMVI	Periodic Motor Vehicle Inspection
RoW	Right of Way
SCP	Spill Contingency Plan
t	Tonne
TMP	Traffic Management Plan
YT	Yukon Territory
WPP	Wildlife Protection Plan

GLOSSARY

Site: Site refers to the KZK Project inclusive of all operational/construction areas, exploration activities and access road(s).

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1 INTRODUCTION

BMC Minerals Ltd. (BMC) is the owner of the Kudz Ze Kayah (KZK) Project (the Project). Since acquiring the Project in 2015, BMC has actively engaged in assessing historical work, optimizing design, resource drilling, economic assessment, baseline environmental studies, First Nations and community engagement, as well as the successful completion of the Executive Committee Screening by the Yukon Environmental and Socio-economic Assessment Board and issuance of a Decision Document by the Federal and Yukon Decision Bodies. BMC has now moved into the permitting phase of the Project with submission of a Quartz Mining Licence application to Yukon Government and a Type A Water Licence application to the Yukon Water Board. Post-permitting Project phases include:

- Construction;
- Operation;
- Active Closure;
- Transition Closure; and
- Post Closure.

The Traffic Management Plan (TMP) describes the primary access routes that will be used in these phases of the Project including, where applicable, discussion of controls on that access, projected traffic volumes, traffic management processes, safety procedures, response processes, and communications.

1.1 SCOPE AND OBJECTIVES

The TMP will focus on two types of traffic routes:

- KZK Tote Road which proceeds south from km 232 of the Robert Campbell Highway to the KZK Camp at approximately km 22. This road will be upgraded to an Access Road suitable for construction and operation of the Project.
- The public highways in Yukon that may be affected by Project related traffic including the Robert Campbell, Alaska, and Stewart-Cassiar Highways.

The objective of the TMP is to ensure BMC's road management practices deliver worker and public safety, maintain environmental integrity, minimize wildlife impacts, meet or exceed regulatory requirements, and support ongoing site and mine operations.

1.2 LEGISLATIVE AND OTHER REQUIREMENTS

BMC will use public highways as well as its currently licenced access road for all post-permitting Project phases. As such, vehicle operations will be governed by both Yukon and Federal Acts as well as specific permits, licences and leases issued through regulation under these Acts directly to BMC and/or its contractors. In addition, BMC has made several commitments throughout the assessment and ongoing permitting process in relation to traffic management that will also be an obligation on

the company and the Project. The following provides a summary of the key relevant legislative requirements.

1.2.1 Applicable Acts and Regulations

Yukon Highways Act RSY 2002, c.108 – Governs use of Yukon Highways including but not limited to:

- a) construction and maintenance standards;
- b) protection of highways; and
- c) access control.

Highways Regulation OIC 2002/174 – Issued under the *Highways Act*. Sets standards for use of Yukon Highways including but not limited to:

- a) Allowable vehicle weights and restrictions;
- b) Vehicle configuration including axel spacing and dimensions;
- c) Reporting requirements; and
- d) Access permit requirements for access to a designated highway.

Bulk Commodity Haul Regulation OIC 1994/175– Issued under the *Highways Act* and subject to the *Highways Regulation*, allows for bulk commodity haul on Yukon Highways under a permit. A permit issued under this Regulation may specify the following in an Operating Agreement:

- a) the type of commodity to be hauled;
- b) additional fees payable by the carrier;
- c) the route of the haul, including origin, destination and approved discharge and stop over points
- d) vehicle specifications including:
 - (i) special safety or monitoring equipment;
 - (ii) maximum gross vehicle weight and axle weights;
 - (iii) size and configuration; and
 - (iv) gross vehicle weight/horsepower.
- e) vehicle operating and safety procedures including speed limits;
- f) restrictions on days or hours of operation;
- g) vehicle maintenance procedures;
- h) special reporting requirements;
- i) special driver qualifications;
- j) lease-operator requirements;
- k) number of vehicles which may be used for the haul;
- l) length of time the agreement is to be in effect; and
- m) any other conditions the Minister considers necessary.

Yukon Motor Vehicles Act RSY 2002, c.153 – Specifies licencing requirements for motor vehicles and drivers, designates allowable vehicle configurations, and sets speed limits by Order in Council.

National Safety Code Regulation OIC 2007/168 – Issued under the *Yukon Motor Vehicles Act*. Binds Yukon to abide by National Safety Code (NSC). The NSC is a set of 16 standards developed by the

member jurisdictions of Canadian Council of Motor Transport Administrators in consultation with the motor carrier industry to ensure road safety and facilitate the safe and efficient movement of people and goods across Canada. Standards include:

- a) Standard 1: Single Driver Licence Concept
- b) Standard 2: Knowledge and Performance Tests (Drivers)
- c) Standard 3: Driver Examiner Training Program
- d) Standard 4: Classified Driver Licencing System
- e) Standard 5: Self-Certification Standards Procedures
- f) Standard 6: Medical Standards for Drivers
- g) Standard 7: Carrier and Driver Profiles
- h) Standard 8: Short-Term Suspension
- i) Standard 9: Commercial Vehicle Drivers Hours of Service
- j) Standard 10: Cargo Securement
- k) Standard 11: Periodic Motor Vehicle Inspection
- l) Standard 12: CVSA On-Road Inspections
- m) Standard 13: Trip Inspection
- n) Standard 14: Safety Rating
- o) Standard 15: Facility Audits
- p) Standard 16: Entry Level Training: Class 1 Commercial Truck Drivers

Motor Vehicle Transport Act RSC 1985, c.29 – Federal legislation governing commercial transport within Canada including extra-provincial truck undertakings which include intra-provincial trucking of goods and materials.

Commercial Vehicle Drivers Hours of Service Regulations SOR/2005-313 – Regulations enacted under the *Motor Vehicle Transport Act* prescribing allowable commercial driver's hours of service consistent with the NSC.

Motor Carrier Safety Fitness Certificate Regulation SOR/2005-180 - Regulations enacted under the *Motor Vehicle Transport Act* prescribing requirements for safety certificates for intra-provincial trucking.

Transportation of Dangerous Goods Act S.C. 1992, c34 and Regulations – Federal legislation governing the transportation of specified dangerous goods within Canada to promote public safety, security, and environmental protection.

Yukon Dangerous Goods Transportation Act RSY 2002, c. 50 and Regulations –Yukon legislation governing transport of dangerous goods within Yukon. Adopted Federal standards.

Yukon Environment Act and Spills Regulations – Yukon legislation outlining procedures to be taken in the event of a hazardous substance spill and reporting requirements for spills.

Yukon Workers Safety and Compensation Act SY 2021, c 11 and Workplace Health and Safety Regulations OIC 2022/118– Governs worker safety and employer's responsibilities.

Yukon Historic Resources Act (YG, 2002)– Yukon legislation regarding preservation, documentation, and handling of heritage resources.

Yukon Archaeological Sites Regulation (O.I.C. 2003-73) - under the *Historic Resources Act*.

1.2.2 Existing Authorizations

In addition to authorizations that will need to be obtained, BMC currently holds authorizations that are directly applicable to the TMP.

1.2.2.1 Lease Agreement 2848-20-105G07/001

This lease was made pursuant to *Territorial Lands (Yukon) Act* and the *Territorial Lands Regulations* and covers the KZK the existing Access Road and Gatehouse from km 232 of the Robert Campbell Highway south to the KZK Project site a distance of approximately 24 km. The road lease was initiated in the early 1990's by Teck Cominco. The lease was assigned to BMC on purchase of the KZK Project in 2015.

The lease includes clauses prescribing:

- a) Term of the agreement – Including annual lease payments;
- b) Improvements – Restricts ability of lessee to make permanent improvements on the land;
- c) Security – Requirements for security in a prescribed form to cover reclamation costs for the road;
- d) Environmental – Includes specific clauses to mitigate impacts to wildlife;
- e) Assignments – Limits the lessee's ability to assign the lease without Yukon Government approval;
- f) Overhold – Conditions in case BMC occupies the land while waiting for a lease renewal;
- g) Fuel and Hazardous Chemicals – Conditions on use and storage;
- h) Access – Outlines authorized use of the road is restricted to BMC for purposes of KZK programs and operation (i.e. private road). Includes obligation on BMC to report unauthorized use;
- i) Indemnification – Lessee indemnifies Yukon Government;
- j) General – Includes termination clauses;
- k) Reclamation – Lessee must have an approved reclamation plan for the lease areas;
- l) Waste Disposal – Conditions on disposal of waste associated with use of the lease lands;
- m) Trap Line – Recognition of rights of a trap line holder in the area; and
- n) Mine Site – Conditions requiring lessee to abide by the terms of the lease.

The current lease (105G07-001) is for 24 km of road with a 20 m right of way (RoW). BMC has applied to Yukon Government's Department of Lands to amend this lease to include only the first 18.88 km (referred to as 19 km) of road with a 30 m RoW (from the turn off at the Robert Campbell Highway to approximately 500 m before the existing camp) (Appendix A). The remaining approximately 5 km of road, under the existing lease, will become part of the Project's Quartz Mine Licence, as mine operations will occur over the existing road alignment. This TMP will apply to the amended Access Road lease area (i.e. 19 km) while the remaining 5 km of road will be managed under the Quartz

Mining License as described in the Road Construction Plan (BMC, 2026a) listed in Section 1.3 below. Upon receipt of the amended lands lease this TMP will be reviewed and amended to include any revised clauses (where needed).

1.2.2.2 Type B Water Licence QZ16-085

BMC's Type B Water Licence was issued by the Yukon Water Board pursuant to the *Waters Act* and *Waters Regulation*. The water licence covers water use and waste disposal for exploration and camp operations as well as specific clauses related the Access Road.

In relation to the Access Road the water licence specifically allows BMC to (bullets are the actual clauses from the licence):

- e) use and maintain existing culvert crossings along the Tote Access Road;
- f) use and maintain existing bridge crossing over Finlayson Creek at kilometre 17 of the Tote Access Road;

In addition, the water licence requires an annual inspection by a qualified person of the bridge crossing at Finlayson Creek and all culvert crossings. A report on the inspection is required to be submitted as part of the annual water licence report.

1.2.3 Decision Document Terms & Conditions

Term & Condition #10d (in part) of the Project's Decision Document states:

The FCHOC shall submit recommendations related to addressing potential impacts on the FCH from the Project to YG regulators. YG shall give full and fair consideration to recommendations from the FCHOC, and to the extent of its authority under applicable legislation, YG shall incorporate the recommendations into project authorization requirements.

Term & Condition #42 of the Project's Decision Document states:

"As part of the Finlayson Caribou Herd Oversight Committee's (FCHOC) review of mitigation and management strategies, the FCHOC will review and may make recommendations on whether activities on the mine access road, other than for ingress and egress of employees and for site safety, will be suspended for one month in the spring and one month in the fall each year to allow for seasonal migration of the FCH".

Term & Condition #49 of the Project's Decision Document states:

"The Proponent shall incorporate into the Operational Plan and shall implement measures and procedures which accommodate the use of the road by persons holding valid authorizations under the Resource Roads Regulation for the purpose of exercising existing or asserted Aboriginal or treaty rights.

The Permittee shall not impose restrictions or requirements that would materially impede access by access authorization holders, except where necessary to address reasonable concerns respecting safety, environmental protection, or the operational integrity of the road."

In accordance with these Terms and Conditions this Traffic Management Plan will be updated to include additional traffic related mitigation measures (including road closures) that are recommended by the FCHOC and that Yukon Government requests to be added to the Project's authorizations.

1.3 LINKAGES TO OTHER MANAGEMENT PLANS

The Traffic Management Plan will operate in concert with other Plans including:

- Emergency Response and Health and Safety Plan (BMC, 2026b);
- Hazardous Materials Management Plan (BMC, 2026c);
- Heritage Resource Protection Plan (BMC, 2026d);
- Road Construction Plan (BMC, 2026a);
- Socio-economic Management Plan (BMC, 2026e);
- Spill Contingency Plan (BMC, 2026f); and
- Wildlife Protection Plan (BMC, 2026g).

2 ACCESS ROAD AND HAUL ROUTE

2.1 ACCESS ROAD

The Tote Road generally follows the gentle benches and ridges above the valley bottom leading to the Project area (Appendix A). Slopes are gentle with many flat wet areas dissected by low winding ridges. There is one bridge crossing Finlayson Creek at km 17 in a broad gentle draw. There are a number of small ephemeral streams and low, wet swales along the existing route. The alignment climbs slowly from approximately 1,040 masl at the highway to 1,400 masl at the Project area. Soils are predominantly sand and gravel deposits intersected by areas of silty soils with a large component of gravel to boulder sized material derived from the local schist outcrops.

In 2015, the Tote Road was repaired to return it to a safe standard suitable for the ongoing exploration program. Washouts were fixed, culverts replaced as required, the road prism was reestablished, cross drain culvert sumps were cleaned, the bridge deck at the Finlayson Creek crossing was replaced, and repairs to the abutments were undertaken. Since 2015 minor maintenance of the road has generally occurred annually each spring with additional grading during the summer as required. The L100 Bridge at Finlayson Creek has a Gross Vehicle Weight rating of 91 tonne (t) and will be adequate for all phases of the Project with regular maintenance.

Activities to be undertaken during the Access Road upgrades will include upgrading approximately the first 19 km of the existing 24 km road to a 5 m wide, single lane all weather Access Road. Details of the upgrades and associated design of the road are included in BMC's Access Road Lease Amendment Application and BMC's Borrow Area Land Lease Application. The remaining approximately 5 km of existing access road will be modified as a result of mine operations and will become part of the Project's Quartz Mining Licence.

2.2 HAUL ROUTE

The KZK Project can be accessed via the Robert Campbell Highway (YT#4) either from Watson Lake to the south, or Carmacks to the west. All construction and re-supply material that comes into the site will use one of these two routes. Depending on the origin of the material, access will also be gained over the Klondike Highway (YT#2) and Alaska Highway (YT#1).

The Robert Campbell Highway from Watson Lake (km 0) to approximately Tutchitua River (km 110) is a two-lane highway, hard surfaced with Bituminous Surface Treatment (BST). Between Tutchitua River and the KZK Access Road junction (km 232) the highway is two-lane gravel surfaced. The Robert Campbell Highway between km 232 and km 414 is two lane gravel surfaced and is a two-lane BST surface between km 414 and km 582 at Carmacks. As part of the YG BST replacement program, sections of the highway may be turned to gravel in one summer season then re-surfaced the following year with BST. These sections are dependant on the age and condition of the BST and are at the determination of Highways and Public Works.

Project construction materials and re-supply traffic are expected to be through Watson Lake and will primarily use the Alaska Highway from Fort Nelson or the Stewart-Cassiar Highway from Stewart BC. Local contractor traffic coming from Whitehorse may use the Alaska/Campbell route or could use the

Klondike/Campbell route. Pick-up and service vehicles travelling from Whitehorse will also have the same options on route to site.

All concentrate shipments will travel south on the Robert Campbell Highway from the km 232 Access Road junction to Watson Lake. From here, after scaling at the Yukon Government Weigh Scales, concentrate trucks will proceed west on the Alaska Highway to the Stewart-Cassiar Highway (YT/BC#37) south to Meziadin Junction then west on the Stewart Highway (BC#37A) to the port of Stewart BC for shipment. Distances from the KZK Access Road Junction on the Campbell Highway through the primary haul route to Stewart BC are shown in Table 2-1.

Should concentrates be sold within the North American market, concentrate may travel east from Watson Lake via the Alaska Highway to a rail siding at Fort Nelson for subsequent rail haulage to the customer, if that transportation route is considered to be more efficient than that of sea freight. This is entirely dependant on commercial arrangements and for the purposes of this TMP it has been assumed that all shipments will go to the Port of Stewart. All traffic measures described in this TMP will apply to any traffic that uses an alternative route out of the Yukon. Regardless of end destination, all Yukon based concentrate haul will travel south from the Access Road junction on the Robert Campbell Highway to Watson Lake.

All Project vehicles will carry suitable health and safety equipment and spill response supplies to be used in the event of an accident or spillage of concentrates as per the requirements of the Spill Contingency Plan (BMC, 2026f).

Table 2-1: Concentrate Haul Distance

Route	Road Type and Distance (km)			One-Way Trip (km)	Round-Trip (km)
	Gravel 1 Lane	Gravel 2 Lane	Hard Surface* 2 Lane		
KZK Access	24			24	48
Robert Campbell Highway YT#4		122	110	232	464
Alaska Highway YT#1			21	21	42
Stewart-Cassiar YT/BC# 37			565	565	1130
Stewart- Cassiar BC#37A			61	61	122
TOTAL	24	122	757	903	1806

*Hard Surfacing includes Bituminous Surface Treatment (BST) and Asphalt Pavement

2.2.1 Seasonal Weight Restrictions

The haul route will be subject to seasonal weight restrictions enacted by the Yukon Department of Highways and Public Works. These restrictions are put in place yearly and require reduced load sizes to minimize damage to the highway road base during spring thaw. This will impact both inbound and outbound heavy traffic. The non-hard surfaced sections of the Robert Campbell Highway are normally restricted to 75% legal loads. The remainder of the haul route will remain at 100% legal loads.

2.3 TRAFFIC VOLUME

Peak truck traffic volumes will occur during the operation phase of the Project when the concentrate haul and re-supply operations are underway. Volumes during all other phases will be significantly lower and less predictable as to timing and duration (7 semi-tractor trailer units/day vs 26). Table 2-2 presents estimated traffic volumes during the Construction period for comparative purposes.

Table 2-2: Average Estimated Traffic Volumes During Construction/Active Closure

Type of Truck	Trucks/Year	Trucks/Month	Trucks/Day
Tractor Trailer Units	6570	547	18
Pick-ups and Service Trucks	5475	456	15
Total	12045	1003	33

Table 2-3 shows estimated traffic volumes during operation and is restricted to semi tractor trailer units. Traffic volumes during Active Closure will likely be similar to the volumes during the Construction phase and will decrease further during Transition and Post Closure. For the purpose of this plan the volumes anticipated during Operations are used as the benchmark.

Table 2-3: Average Estimated Traffic Volumes During Operations

Type of Product	Yearly Requirement	Load/Truck Average	Trucks/Year	Trucks/Month	Trucks/Day
Reagents (t)	15,400	20	770	64	2.1
Operations Fuel (l)	18,166,000	43,900	413	34	1.1
Generator LNG (GJ)	991,200	1,500	661	55	1.8
Explosives (t)	6,400	20	320	27	0.9
Underground Paste Cement (t)	13,300	40	333	28	0.9
Miscellaneous (t)	5000	20	250	21	0.7
Subtotal			2747	229	7.5
Concentrates					
Cu/Zn – Bulk Haul (t)	250,000	44	5,682	474	15.8
HPM Concentrate – Container	36,500	33	1,106	92	3.1
Subtotal			6,788	566	19
Total Heavy- Duty Vehicles			9,535	795	26.5
Light Duty Vehicles			8,395	700	23
Total All Vehicles			17930	1495	49.5

Heavy duty vehicles include all semi-tractor trailer units and concentrate haul. Light duty vehicles include pick-ups, service trucks, crew transport buses, and delivery vans. All traffic numbers are one-way trips.

3 TRAFFIC MANAGEMENT

3.1 ACCESS ROAD USE MANAGEMENT

Management of the Access Road is currently governed by the existing Tote Road Lands Lease which following the current amendment application and future renewals, will continue throughout the life of the Project. The complete management of the Access Road will be governed by:

- 1) Existing and Amended Access Lease Agreement;
- 2) Requirements of other applicable regulatory approvals (i.e. Type B Water Licence);
- 3) Commitments made in the Management Plans that will become Schedules to the QML;
- 4) Applicable Terms and Conditions of the Project Decision Document (see Table of Concordance);
- 5) Commitments made by BMC in its Project Proposal and throughout the Environmental and Socio-economic assessment process (see Table of Concordance); and
- 6) Regulatory instruments identified in Section 1.2.

For ease of reference, all conditions relating to management, construction, maintenance, and operation of the Access Road contained in the existing Tote Road Lease, Type B Water Licence, and management measures as per bullets 1 through 3 above, are summarized in Table 3-1 below. Commitments in bullets 4 and 5 have already been presented the Table of Concordance (above). Bullet 5 deals primarily with the vehicles and operators that will be using the road and due to the extensive legislative requirements under these Acts and Regulations, they are not included here.

Table 3-1: Access Road Management Measures

Mechanism	Measure	Clause/Section
Existing Lease Agreement 848-20 105G076001	This lease is given on the understanding that the Land is to be used only as an access road. No tailings or liquid or other discharges are to be deposited on the said Land.	11
	The Lessee shall ensure that all activities are conducted in a manner that mitigates and significant environmental effects.	23
	The Lessee shall not do anything which will cause the erosion of the banks of any body of water on or adjacent to the Land and shall provide necessary controls to prevent such erosion.	24
	The Lessee shall incorporate accepted erosion control practices into the design and construction of the access road.	25
	The Lessee will minimize the potential for disturbance to caribou during sensitive life cycle activities by avoiding those areas that are used for calving, post-calving and rutting, and by ensuring the access road does not conflict with areas used by caribou and other migratory wildlife (i.e. moose)	31 (i)
	Encounters with wildlife are to be avoided. If caribou or moose are encountered on the access road, the equipment and or the activity is to be halted immediately until the wildlife have left the area.	31 (ii)
	The Lessee shall develop a reporting mechanism with YG Renewable Resources for the reporting of any wildlife fatalities that occur along the access road.	31 (iii)
	The Lessee shall take all reasonable precautions to prevent the possibility of migration of spilled petroleum products over the ground surface or through seepage in the ground	39
	That the Lessee shall take all reasonable precautions to prevent the migration of petroleum products into bodies of water.	40
	That the Lessee will be required to undertake such corrective measures as may be specified by Yukon the event (sic) of waste spill on the land or water or wind erosion of the land resulting from the Lessee's operations.	44
	The Lessee may maintain the gate and gatehouse installed on the mine access road within the boundaries of the land.	49
	The Lessee shall report in writing to Yukon each instance of unauthorized use of the Land within one month of the instance becoming known to the Lessee.	53
	The Lessee shall conform to all applicable federal, territorial, local regulations, municipal acts, zoning, permits, or by-laws.	60
	That the Lessee shall have vacant possession of the Land upon execution of this lease.	62
	The Lessee shall within one year of the commencement of construction of the facilities authorized herein, deliver to Yukon for his review and approval a plan of reclamation which, where applicable, shall include but is not limited to the following: a) buildings and other structures; b) roads and airstrips; c) water supply facilities; d) tailings disposal facilities; e) waste rock disposal sites;	72

Mechanism	Measure	Clause/Section
	f) petroleum and chemical storage areas and facilities; g) garbage, sewage and waste storage or disposal sites and facilities; h) pipelines and electrical transmission installations; i) site drainage systems, granular material deposits and open pit areas; j) other facilities or sites utilized during the operation; k) revegetation; l) the Land generally; and such plan shall be prepared with the objective of reclaiming the Land as near as possible to its original state, including the removal of all improvements, or such alternative objectives as may be approved by Yukon.	
	The Lessee shall not discharge or deposit any refuse substance or other waste materials in any body of water, or the banks thereof, which will, in the opinion of Yukon, impair the quality of the waters or the natural environment and any areas designated for waste disposal shall not be located within thirty point four-eight (30.48)metres of the ordinary high water mark of any body of water, unless authorized by Yukon.	81
	This lease and the said Land are subject to the trapping rights of the holder or holders of a registered trap line within the said land.	89
Type B Water Licence QZ16-085	The Licensee is hereby authorized to: • use and maintain existing culvert crossings along the Tote Access Road; • use and maintain existing bridge crossing over Finlayson Creek at kilometre 17 of the Tote Access Road; • construct earthworks and erosion protection; • discharge a Waste in the form of sediment to Finlayson Creek	1
	All disturbed ground surfaces shall be stabilized in such a manner so as to prevent erosion and surface runoff from carrying sediment to any watercourse.	8
	The in-stream works shall not occur during a timing window of April 15 to June 15 of any year.	9
	When conducting any instream works, creek flow must be diverted around the work areas.	10
	The Licensee shall salvage all fish prior to de-watering the work area.	11
	Construction and/or maintenance equipment shall be mechanically sound and free of leaks.	12
	The tracks and/or wheels of heavy equipment are prohibited from entering the Wetted Perimeter of any Watercourse.	14
	Granular bedding and backfill material shall consist of non-frozen material.	15
	All water withdrawn from the abutment excavation shall be deposited into a constructed sump and/or natural depression.	16
	Excavated material shall be deposited to a Waste disposal area a minimum of 10 horizontal metres beyond the Natural Boundary of any Watercourse.	17
	Material excavated from the Watercourse must be deposited in the Waste disposal area in such a manner as to remain in a stable condition.	18

Mechanism	Measure	Clause/Section											
	To minimize impacts on surface drainage, the Licensee shall prepare all sites in such a manner as to prevent rutting of the ground surface.	19											
	Rip-rap shall be hard, dense, angular, Non-Acid Generating and Non-Metal Leaching quarry stone or boulders, free of seams, cracks, structural defects and contaminants, freeze-thaw resistant, non-slaking and free of fine-grained materials including silt and sand.	20											
	The Licensee shall cease pumping or decanting and take remedial action if there is alteration to the bed or bank of the water channel as a result of pumping.	23											
	The Licensee shall apply the relevant procedures in the Spill Contingency Plan. The Licensee shall review the Spill Contingency Plan annually and shall provide a summary of that review, including any revisions to the plan, as a component of the annual report.	25											
	The Licensee shall maintain a log book of all spill or unauthorized discharge occurrences, including spills that are less than the reportable quantities under the Yukon Spills Regulations. The log book shall be made available at the request of an Inspector. The log book shall include, but not necessarily be limited to: a) the date and time of the spill or unauthorized discharge occurrences; b) the substance spilt or discharged; c) the approximate amount spilt or discharged, d) the location of the spill; e) the distance between the spill and the nearest Watercourse; and f) remedial measures taken to contain and clean-up the spill area or to cease the unauthorized discharge,	26											
	The Licensee shall include a summary of all spills or unauthorized that occurred during the year, as part of the annual report.	27											
	All personnel shall be trained in procedures to be followed and the equipment to be used in the containment of a spill.	28											
	The Spill Contingency Plan shall be posted on site for the duration of the works.	30											
	During maintenance activities occurring within the Wetted Perimeter of Finlayson Creek, the following shall be used as turbidity compliance limits: <table border="1"> <thead> <tr> <th>Type of Water</th><th>Background (Ambient) Water Quality (NTUs)</th><th>Maximum Allowable Increase in Turbidity</th></tr> </thead> <tbody> <tr> <td>Clear Flow</td><td>< 8 NTU</td><td>8 NTU above background</td></tr> <tr> <td rowspan="2">High Flow</td><td>8-80 NTU</td><td>8 NTU above background</td></tr> <tr> <td>>80 NTU</td><td>10% Allowable increase in turbidity above background</td></tr> </tbody> </table>	Type of Water	Background (Ambient) Water Quality (NTUs)	Maximum Allowable Increase in Turbidity	Clear Flow	< 8 NTU	8 NTU above background	High Flow	8-80 NTU	8 NTU above background	>80 NTU	10% Allowable increase in turbidity above background	34
Type of Water	Background (Ambient) Water Quality (NTUs)	Maximum Allowable Increase in Turbidity											
Clear Flow	< 8 NTU	8 NTU above background											
High Flow	8-80 NTU	8 NTU above background											
	>80 NTU	10% Allowable increase in turbidity above background											
	The compliance points shall be 50 and 100 metres downstream of the in-stream work area.	35											
	Compliance points shall be sampled at a minimum frequency of every 2 hours during periods of maintenance.	36											
	If the limits in clause 40 (sic) are exceeded, turbidity generating activities shall be stopped or adjusted to ensure compliance.	37											

Mechanism	Measure	Clause/Section
	All disturbed ground surfaces shall be regraded in a manner which is consistent with the topography of the site and which prevents erosion and surface runoff from carrying sediment into any Watercourse. Where soils conditions permit, disturbed areas shall be revegetated with appropriate reclamation seeds and/or plant species that are native in Yukon.	38
	All construction materials, equipment, temporary structures and debris shall be removed from the site upon completion of the work.	39
	All hazardous materials that are removed from the work areas shall be disposed of in accordance with the provisions of the Special Waste Regulations of the Environment Act and shall include a description of the disposal as part of the annual report.	40
	a) On or before the anniversary date of the issuance of this licence, and for each year during which the licence is in effect, The Licensee shall submit an annual report to the Board. The report shall include the information required by the Regulation including, but not necessarily limited to: b) a description of the water use operations carried out in the year reported; and c) the quantity of water used each day; and d) the hours of pumping each day; and e) the quantity and size of rip-rap used; f) any reclamation to the site; and g) copies of all orders, directions and correspondence relating to drinking water sampling or analysis from the Medical Health Officer or from a Health Officer; and h) a detailed record of any major maintenance work carried out or planned to be carried out that could have an impact on water; i) the results of all analyses required by the turbidity monitoring program; j) the inspection results, including photographs, repairs or plans for modification required by the physical monitoring program; and k) summaries of all data generated as a result of the monitoring requirements of this licence, including analysis and interpretation by a qualified individual or firm and a discussion of any variances from baseline conditions or from previous years ' data.	46
	The Licensee shall upload electronic copies of all reports required by this licence to the Yukon Water Board's online licencing registry, Waterline.	48
BMC Wildlife Protection Plan (WPP)	Employee and contractor site inductions (training and orientation) will include the following topics in relation to wildlife management: • Access Road use protocols; • BMC's policies and procedure, and statutory permit/lease requirements; • Bear awareness; • Waste management procedures; • Wildlife observation and interaction reporting procedures; • Wildlife - sensitive locations and periods as applicable;	WPP 3.2.2 (Rev 01) (to be updated)

Mechanism	Measure	Clause/Section
	- Helicopter management practises; and - Transportation and access management practises.	
	Access Road Design and Upgrade: - The Tote Road will be upgraded to an Access Road to avoid blind spots and reduce potential for wildlife collisions; - Visible markers will be installed every kilometre, in both directions of travel, to allow road users to identify and report the location of all wildlife observations, or other incidences; - Where embankments are necessary, they will be graded to a low slope (1:5), when practicable. Surfaces will be smooth, compact, and constructed with finer fill (<100 mm) to avoid leg entrapment; and - Equipment laydown areas will be >30 m from known wildlife trails or wildlife road crossings, where practicable. - Control and direct surface runoff away from the construction/operations area to reduce potential contamination, sedimentation, and smothering of vegetation per the Sediment and Erosion Control Plan (BMC, 2026h); - Machinery and personnel are required to remain within the defined Project area and along defined roads; - Use new or well-maintained heavy equipment and machinery with mandatory fully functional emission control systems, muffler, exhaust system baffles, and engine covers; - Vehicles and earthmoving equipment being brought to site are to be clean to prevent introduction of invasive species; - Implement a regular vehicle and equipment maintenance program to minimize noise, emissions, and reduce the frequency of spills; and - Discourage and limit on site vehicle and equipment idling, when practicable.	WPP 3.5.1, 3.5.4 (Rev 01) (to be updated)
	Access Road Control - Public access restriction; - Speed limits; - Warning of narrow road and large vehicle use; - Functional two-way radio requirement with channel frequencies; - List of road use conditions including lights on, maximum speed limit, wildlife areas, obey all signs; and - Wildlife sighting/incidents will be documented on the wildlife observation cards and wildlife incident forms,	WPP 3.7.1 (Rev 01) (to be updated)
	Access Road Operation - Wildlife have the right-of-way along the entire Access Road; - If wildlife is encountered on the Access Road, the equipment and/or activity will be halted until the wildlife has left the immediate area; - All on-road and off-road vehicles are restricted to established roads and designated trails at the Project site, except to access monitoring sites and remote communications equipment; - Use of private and recreational vehicles on site is prohibited;	WPP 3.7.1.2 (Rev 01) (to be updated)

Mechanism	Measure	Clause/Section
	- Wildlife observations on access corridors will be recorded on wildlife observation cards and reported to the site Environmental Department. A Wildlife Sighting Log will be maintained; - Wildlife incidents (e.g. traffic accidents) will be reported to the Environmental Department as soon as is practicable; - Wildlife near misses and collisions will be investigated to identify the cause and possible future remedial actions; - Travel speeds along the roadway will be abided during daytime travel, and reduced during night-time or hazardous weather conditions as appropriate; - Signage will be posted in high collision risk areas (e.g., blind, or obstructed turns, water and wildlife crossings). These signs will instruct drivers to reduce speed, remain alert, stop for wildlife, and wait for wildlife to move away; - Radios will be used to communicate information such as sightings of large animals, dust, and other hazards; - Any spills on roadways will be handled as per the Spill Contingency Plan; - Minimum traffic levels will be maintained to the extent practical. Convoys of 2 or 3 vehicles will travel along transportation route together when practicable to reduce periods of sensory disturbance; and - Regular vehicle and equipment maintenance will be conducted to minimize noise, emissions, and spills.	
	Access Road Maintenance - In summer, vegetation along roads will be brushed to reduce browse and forage for wildlife, and to improve visibility. Clearing will be done early in the season; - Debris, such as fallen trees, will be removed from roadways as soon as is practicable; - Fugitive dust will be controlled using water sprays or an approved dust suppressant (environmentally-sound that do not contain salts that would attract wildlife) to minimize the Project's zone of influence on the surrounding landscape; - Road embankments will be low profile to prevent the road acting as a barrier to, or channel for, wildlife movement; - Native seed mixtures will be used to prevent erosion along roadsides. Seed mixtures will contain minimal attractive/palatable vegetation to bears and ungulates (such as legumes); and - In winter, measures will include: - Radio communication among road users will be required to communicate information such as sightings of large animal species; - Snowbanks will be kept less than one-metre high and wildlife passageways will be ploughed through banks on the Access Road and on all site access roads at approximately 50-100 m intervals; - Gravel and/or sand will be used on compacted snow or ice to improve road safety. Salt will not be used as it is a wildlife attractant; and - Snow plowing of Access and Project roads will be limited to only those required for current operations, maintenance, and/or emergency access.	WPP 3.7.1.3 (Rev 01) (to be updated)
	Public Highway Transport - Comply with no hunting code of conduct; - Carry and maintain appropriate spill kits in all vehicles;	WPP 3.7.2 (Rev 01) (to be updated)

Mechanism	Measure	Clause/Section
	- Adhere to speed limits and reduce speeds in adverse driving conditions; - Adhere to wildlife encounter protocols on highways; - All drivers will be informed of high risk areas for wildlife encounters where they will be more alert and follow any posted speed reduction requirements. High risk times and areas include: - The RCH east and west of the Access Road junction from January 1 to March 31 in the Finlayson caribou herd wintering grounds; and - The northern end of Highway 37 and its junction with the Alaska Highway from January 1 to March 31 in the Little Rancheria and Horseranch caribou herds wintering grounds.	
BMC Spill Contingency Plan (SCP)	Spill Response Procedures Spill Response Equipment Clean-up Procedures Concentrate Spills Training Requirements Site and Access Road Spill Prevention	SCP 3.3 SCP 3.4 SCP 3.5 SCP 3.5.2 SCP 5.0 SCP 6.2
BMC Heritage Resource Protection Plan (HRPP)	Communication and Reporting Requirements Ground Disturbing Activities Chance Finds Chance Find Procedures Archaeological Find Paleontology Find Human Remains Planned Impact of Known Sites Prompt Communication with Kaska and Heritage Resources Unit	HRPP 4.3 HRPP 4.3.1 HRPP 4.3.2 HRPP 4.3.4 HRPP 4.3.5 HRPP 4.3.6 HRPP 4.3.7 HRPP 4.3.8
BMC Hazardous Materials Management Plan (HMMP)	Spill Prevention and Response	HMMP 6.0

3.1.1 Access Control

Since the Tote Road was established under land lease in the 1990s, the requirement has been that it is gated, and access is controlled and restricted to operational traffic only. This requirement will remain throughout all phases of the Project until final reclamation, with the exception of potential use by persons holding valid authorizations under the *Resource Roads Regulation*.

The Gatehouse at km 0.2 of the Access Road will be staffed and operational 24/7 during the Construction, Operation, and Active Closure phases. During Transition Closure phases of the Project year-round access may not be required and as is the case currently, the Gatehouse may only be staffed when the road is open, normally late May through October. Following reclamation and final closure the gatehouse facilities will be removed.

Entry to the Access Road beyond km 0.2 is restricted to authorized Project traffic only; no public use of the road is allowed. Employees and Contractors will not be allowed to use private vehicles on the access road. As discussed above, the only potential exception to this restriction will be the use of the Access Road by persons holding valid authorizations under the *Resource Roads Regulation* for the purpose of exercising existing or asserted Aboriginal or treaty rights. BMC will implement measures and procedures for such persons to use the road, and will not impose restrictions or requirements that would materially impede their access, except where necessary to address reasonable concerns respecting safety, environmental protection, or the operational integrity of the road.

All traffic entering the Access Road at km 0.2 will be required to check in at the Gatehouse where they will be informed of road conditions, maintenance activity on the road, or potential areas of wildlife interaction. The Gatehouse will also serve as the initial point of orientation for first time drivers to the site. All drivers will be given an orientation on the rules of the road and radio procedures before being allowed to enter the controlled zone.

All vehicles entering the Access Road control zone will be required to be equipped with flashing strobe lights and radios.

The Access Road control zone is deemed to be from the Gatehouse at km 0.2 to the camp at km 19. Vehicles moving into the mining zone beyond the camp will be required to follow specific protocols as per the Road Construction Plan (BMC, 2026a).

3.1.2 Right of Way and Road Standards

The Access Road will be constructed to the standards and design specified in regulatory approvals. The Access Road and associated RoW will be maintained over the life of the Project to a standard suitable to ensure the Traffic Management objectives can be met.

3.1.3 Road Maintenance

Road maintenance is essential to meet the objectives of the TMP. Maintenance will be conducted on a regular scheduled basis. Additional maintenance will be done as road conditions require to ensure safety standards are maintained. Maintenance activities include:

Summer/Fall

- Grading to ensure as smooth a running surface as possible;
- Culvert inspection and maintenance to ensure they are functioning as designed;
- Cleaning or pulling ditches as required;
- Re-surfacing as required using non acid generating or leaching material;
- Right-of-way brushing as required. All brushing will be done outside of the bird nesting window (May through August); and
- Repair/replacement of damaged signage.

Winter/Spring

- Snow removal from driving surface and pullouts;
- Maintenance of breaks in snow berms for animal access and egress;
- Steaming of culverts as necessary in advance of spring melt;
- Glacier control as required;
- Sanding or scarification of road surface on steep gradients as required; and
- Repair/replacement of damaged signage.

It is anticipated most of the road maintenance work will be done using a grader in both summer and winter. The grader will be equipped with a wing in the winter months to assist in moving snow off the driving surface and out to the edges of the RoW. Summer resurfacing activities will also include the use of tandem axel gravel trucks, packers, and water trucks.

3.1.4 Speed Limits

Speed limits will be enforced for all traffic on the Access Road and signage will be in place to confirm this for all drivers. A log will be kept at the Gatehouse and at camp and each vehicles departure and arrival time at either end will be recorded.

All traffic using the Access Road will be limited to a maximum speed of 50 km/hour and 20 km/hour for the Finlayson Creek bridge crossing. In inclement weather drivers will be expected to drive to the conditions.

Passing will not be allowed on the Access Road. Slower traffic will move onto designated pullouts as required to allow trailing vehicles to pass safely.

3.1.5 Radio Control

BMC will establish radio coverage along the entire access route. A dedicated frequency will be used on all company fleet radios and will be provided to contractors, suppliers, and bulk carriers for programming on their radios.

At the start of construction, BMC will require that Access Road users utilize the established radio calling protocol. Drivers will be required to announce their vehicle type, location, and direction of travel when they enter the Access Road control zone.

The Access Road will have high visibility km signage every established every kilometer.

3.1.5.1 Radio Procedures

All traffic on the Access Road will adhere to the following protocol.

- Up and Down is used to identify direction of travel
 - Up = Gatehouse to KZK Camp increasing km numbers.
 - Down = Camp to Gatehouse decreasing km numbers.
- Calling protocol
 - Project vehicles must identify themselves as to vehicle type (i.e. concentrate truck, fuel truck pick-up, grader).
 - Up vehicles must call out when leaving the Gatehouse then every even km after. (i.e. fuel truck 2 up).
 - Down vehicles must call out when leaving Camp then every odd km after that (i.e. concentrate truck 17 down).
 - All vehicles are required to call out when arriving at either the Gatehouse or Camp to let all other traffic know they are clear of the control zone.
- Must call situations include
 - When leaving or arriving at the Gatehouse or Camp.
 - At posted “must call” signs i.e. Finlayson Creek bridge.
 - When stopping on the Access Road or at a pullout for any reason and when re-entering the road after doing so. All pullouts will be designated with a number and appropriate identifying signage.
 - When encountering large wildlife on or adjacent to the road (i.e. caribou, moose, bear, wolf).
- Passing is only allowed when trucks are safely situated in a pullout. When passing road maintenance equipment driver must first make radio contact with the vehicle being passed and be given the OK to pass.
- Emergency vehicles have the right-of-way at all times. After emergency vehicles concentrate trucks, fuel trucks, re-supply trucks, and maintenance equipment have the right-of-way. Pick-ups and light duty trucks must yield using pullouts unless otherwise agreed through radio communication with the higher priority vehicle.
- Convoy calling is allowed using the following protocol
 - The lead vehicle is responsible for calling on behalf of the convoy and must note number of vehicles and size in the convoy (i.e. 2 fuel trucks up at 2).

- The vehicle joining the convoy to inform and receive confirmation from the lead vehicle.
- A vehicle more than 1 km behind the lead vehicle is no longer considered part of the convoy and must call out their own location.

3.1.6 Signage

Signage on the access route will be high visibility in English and Kaska and will include:

- km posts;
- Pullout designation;
- Wildlife Crossings;
- Steep Gradients;
- Limited Visibility areas; and
- Speed limit.

3.1.7 Dust Management

Fugitive dust management will be conducted in the summer and fall as required using water sprays (as allowed for in the existing Type B Water Licence) or an approved dust suppressant (environmentally-sound that do not contain salts that would attract wildlife) to minimize the Project's zone of influence on the surrounding landscape.

3.1.8 Parking

All vehicle parking shall be in designated areas at the Gatehouse and Camp. Parking areas shall be graded to provide for positive drainage to prevent standing water accumulation. No private vehicles will be allowed to use the Access Road or be on site. The only parking required at the Camp will be for Project and contractor vehicles.

All vehicle operators are responsible for ensuring their vehicle is parked in a safe manner with the transmission in park or in the case of manual transmissions, in reverse. The use of wheel chocks will be mandatory on site.

Vehicles must be turned off when parked to minimize idling time. Any fuel spills or leaks will be dealt with as per the requirements of the Spill Contingency Plan (BMC, 2026f).

3.1.9 Wildlife Protection During Road Maintenance

Road maintenance will use strategies that reduce barriers to wildlife allowing them safe passage across site roads. The following mitigation measures will be implemented to increase wildlife safety around the Access Road and site roads:

- In summer measures will include:

- Vegetation along roads will be brushed to reduce browse and forage for wildlife, and to improve visibility. Clearing will be done early in the season;
 - Debris, such as fallen trees, will be removed from roadways as soon as is practicable;
 - Fugitive dust will be controlled using water sprays or an approved dust suppressant (environmentally-sound that do not contain salts that would attract wildlife) to minimize the Project's zone of influence on the surrounding landscape;
 - Road embankments will be low profile to prevent the road acting as a barrier to, or channel for, wildlife movement; and
 - Native seed mixtures will be used to prevent erosion along roadsides. Seed mixtures will contain minimal attractive/palatable vegetation to bears and ungulates (such as legumes).
- In winter, measures will include:
 - Radio communication among road users will be required to communicate information such as sightings of large animal species;
 - Snowbanks will be kept less than one-metre high and wildlife passageways will be ploughed through banks on the Access Road approximately 50-100 m intervals;
 - Gravel and/or sand will be used on compacted snow or ice to improve road safety. Salt will not be used as it is a wildlife attractant; and
 - Snow plowing of Access and Project roads will be limited to only those required for current operations, maintenance, and/or emergency access.

3.1.10 Wildlife Protection During Road Operation

Wildlife protection measures will be implemented throughout the post-permitting phases of the Project.

Of primary concern on the Access Road is potential impacts to the Finlayson Caribou Herd. The potential for disturbance to caribou during sensitive life cycle activities is minimized by the location of the Access Road which avoids areas used for calving, post-calving, and rutting.

Game trails intercept the Access Road at various locations and wildlife have historically used these trails to access habitats on both sides of the road. These trails often coincide with riparian corridors and easy access to Finlayson Creek. During the spring (April to May) caribou migrate from wintering grounds to calving areas south of the Project and in the fall move back to their wintering grounds. Wildlife will have access to these trails throughout the year.

The following measures will apply to all vehicles operating along the Access Road:

- Wildlife have the right-of-way along the entire Access Road;
- If wildlife is encountered on the Access Road, the equipment and/or activity will be halted until the wildlife has left the immediate area;

- All on-road and off-road vehicles are restricted to established roads and designated trails at the Project site, except to access monitoring sites and remote communications equipment;
- Use of private and recreational vehicles on site is prohibited;
- Wildlife observations on access corridors will be recorded on wildlife observation cards and reported to the site Environmental Department. A Wildlife Sighting Log will be maintained;
- Wildlife incidents (e.g. traffic accidents) will be reported to the Environmental Department as soon as is practicable;
- Wildlife near misses and collisions will be investigated to identify the cause and possible future remedial actions;
- Travel speeds along the roadway will be abided during daytime travel, and reduced during night-time or hazardous weather conditions as appropriate;
- Signage will be posted in high collision risk areas (e.g., blind, or obstructed turns, water and wildlife crossings). These signs will instruct drivers to reduce speed, remain alert, stop for wildlife, and wait for wildlife to move away;
- Radios will be used to communicate information such as sightings of large animals, dust, and other hazards;
- Any spills on roadways will be handled as per the Spill Contingency Plan (BMC, 2026f);
- Minimum traffic levels will be maintained to the extent practical. Convoys of 2 or 3 vehicles will travel along transportation route together when practicable to reduce periods of sensory disturbance; and
- Regular vehicle and equipment maintenance will be conducted to minimize noise, emissions, and spills.

3.2 PUBLIC HIGHWAY USE MANAGEMENT

Use of public highways in the Yukon and BC is governed by various Acts and Regulation as outlined in Section 1.2. The Yukon Government Department of Highways and Public Works is responsible for the management and maintenance of all designated public highways in the Yukon while the BC Ministry of Transportation manages permitting and licensing for use of public highways as required while highway maintenance is conducted through 3rd party contractors.

3.2.1 Road Maintenance

The Yukon Department of Highways and Public Works is responsible for highway maintenance including but not limited to:

- Grading of gravel sections and re-surfacing as required,
- BST patching and replacement as required,

- Maintenance of bridges and culverts,
- Right-of-way brushing,
- Snow plowing,
- Glacier control, and
- Signage.

BMC will work closely with the Department to identify areas where maintenance may be required outside of the normal schedule including road surfaces, brushing, ditching and culvert maintenance. Where imminent failure of any piece of infrastructure is possible, BMC will immediately contact Highways and Public Works to report the situation.

3.2.2 Speed Limits

Speed limits in the Yukon are established through an Order in Council under the *Motor Vehicles Act*. Speed limits can also be established as a condition of a permit issued under the *Bulk Commodity Haul Regulation*. Speed limits may be posted at a lower speed than those designated in the regulation.

The speed limit on the Campbell Highway is 90 km/hr unless otherwise specified. The speed limit on the Alaska Highway is 100 km/hr unless otherwise specified. It is anticipated the speed limit in any Bulk Commodity Haul Permit will be 80 km/hour.

Speed limits in municipalities and populated areas are generally 50 km/hour except for school zones which are a maximum of 30 km/hour.

All Project vehicles will be expected to adhere to the posted speed limit, or the limit designated in an operating permit.

3.2.3 Radio Communication

All Project related traffic will be equipped with radios. Designated must-call points, nominally every 20 km, will be established in collaboration with the Concentrate Haulage Contractor or as required under a Bulk Commodity Haul permit issued by Yukon Highways and Public Works. The same radio protocol procedures as the Access Road and outlined in Section 2.2.8.1 will be used.

Radio communication will also be used between all Project vehicles to identify wildlife on or near the highway, private vehicles on the highway, vehicles parked or broken down on the highway, potential road failures, and report accidents.

The use of the radio system for alerts will provide a higher level of awareness and safety on the route than that of private road users, be they commercial trucks, buses, or private passenger vehicles.

3.2.4 Dust Management

As noted in Section 1.4, approximately 122 kms of the main haul route is a gravel two lane highway. Under dry conditions there will be dust generated by any traffic using the highway, Project related or private. The Department of Highways and Public Works applies dust suppressant in the form of

calcium chloride on a regular basis to gravel sections of the highway. This application not only helps minimize dust it also helps stabilize the road surface.

BMC will work closely with the Department to identify when conditions may require an application of dust suppressant. In addition, speed limit restrictions on Project traffic will help minimize dust over the approximate 7% of the haul route that is not hard surfaced.

3.2.5 Wildlife Protection

As with the Access Road protection of wildlife is a critical component of the Traffic Management Plan when on public highways and many of the same mitigation measures will be used. Yukon Highways and public Works is responsible for maintenance of the highway and the RoW.

The most impactful mitigation is maintaining the RoW to a brushed and clear condition. This allows drivers to see animals that are adjacent to the road and that may enter the roadway well in advance allowing a reduction in speed. BMC will continue to work with Highways and Public Works to identify sections of the highway for brushing on an annual basis.

The following measures are required for operating vehicles on public highways:

- Wildlife have the right-of-way along all public highways;
- If wildlife is encountered on a highway, trucks will be halted until the wildlife has left the highway and it is safe to proceed;
- Wildlife incidents (e.g. traffic accidents) will be reported to the BMC Environmental Department as soon as is practicable;
- Wildlife near misses and collisions will be investigated by the BMC Environmental Department to identify the cause and possible future remedial actions;
- Posted or permitted travel speeds along the highway will be abided during daytime travel, and reduced during night-time or hazardous weather conditions as appropriate;
- Working with Yukon Highways and Public Works, signage will be posted in high collision risk areas; and
- Radios will be used to communicate sightings of large animals.

3.2.6 Pullouts

When Yukon Zinc was in operation, the company collaborated with the Department of Highways and Public Works to establish a series of pullouts on the haul route between km 190 and km 10 of the Robert Campbell Highway. These pullouts were used for drivers to inspect their truck and/or loads, and to allow trailing vehicles the opportunity to pass. These pullouts will continue to be used for the Project related vehicles.

BMC will work with the Department to identify suitable areas between km 190 and 232 where additional pullout construction may be warranted.

3.2.7 Passing Opportunities

Stretches of the Robert Campbell Highway, particularly between km 190 and 232 are narrow with limited passing options for passing tractor trailer units. This is exacerbated in the winter months when snow berms obscure the road shoulders and visually, if not physically, narrow the highway prism.

Tractor trailer units will be driven by professional drivers, and they will use their discretion in letting traffic pass them in narrow sections of the highway. Slowing down and pulling over to the extent possible to encourage trailing traffic to overtake will be the standard. Drivers will also use designated pullouts to allow trailing traffic to overtake.

On occasion it may be necessary to convoy trucks on the Access Road to minimize potential interactions with wildlife. Convoy on the public highways system can however reduce passing opportunities. To minimize that potential, drivers will ensure a suitable spacing between trucks is maintained to provide safe passing opportunities.

3.2.8 Escort Vehicles

The *Yukon Highways Regulation* dictates when tractor trailer units must have an escort or pilot vehicle in front and/or behind them. Generally, escort vehicles are required for oversized or over length loads. Escort vehicles are likely to be required during some loads of major components or equipment during construction. The remainder of the operational truck traffic will be configured such that escort vehicles are not required.

3.2.9 School Zones

Along the haul route there is one School Zone in Watson Lake. The speed limit in the school zone is posted and enforced. All Project traffic (staff, drivers, contractors) will be made aware of the school zone as part of the Project orientation. Project traffic can also expect to encounter school buses in the vicinity of communities along the route. Laws requiring stopping when school buses are loading or unloading will be adhered to by all Project traffic.

3.2.10 Driver Fatigue

Commercial driver's hours of service are governed under the Federal *Commercial Vehicle Drivers Hours of Service Regulations* which dictate the total number of hours a driver can work in a day as well as the number of days they can work before a rest day is required. This is a Canada wide industry standard that flows from the National Safety Code.

As of January 1, 2023, all trucks over a specified weight must have Electronic Logging Devices (ELD) installed. The ELD measure the driver's actual hours and are a replacement for the traditional logbooks the industry used previously. Drivers can be asked to provide their ELD data to a Compliance Officer at any time.

The ELD's and the Regulations combined have helped minimize driver fatigue as a major issue. However, individual haulage contractors still have internal policies in place that allow a driver who is feeling fatigued, regardless of the actual numbers of hours they have logged, to pull over and rest.

3.2.11 Bulk Commodity Haul Regulations and Permit

The concentrate haul from KZK will be conducted under a permit issued under the Yukon Bulk Commodity Haul Regulations. The haulage contractor will be responsible for obtaining the permit and meeting its conditions.

The Bulk Commodity Haul Regulations, enacted under the territorial *Yukon Highways Act* in 1994, allow carriers to apply for authorization for a maximum Gross Vehicle Weight of 77,100 kg., approximately 21% above the normal legal Gross Vehicle Weight of 63,500 kg. Carriers must meet certain criteria around vehicle safety and performance, reporting, and route selection to be considered for a Bulk Haul Permit.

As part of the agreement application process, all vehicle configurations and trailer designs must be assessed for stability and safety by a qualified, independent engineer specializing in vehicle stability. The applicant is also required to provide analysis of all bridges on the proposed route to ensure they are suitable for bulk haul operations. The only bridges on the proposed route have already been assessed as part of the Yukon Zinc Bulk Haul Agreement. Regardless, HPW is unlikely to waive the requirement for an assessment.

Once the agreement is issued it includes additional requirements the carrier must meet to enhance the safety of the operation. The conditions are designed to ensure the bulk haul operation can be conducted safely on the selected route under all anticipated conditions.

Operating conditions are established under various categories and include:

1. Vehicle Specifications and Stability and Control Measures
 - a. Independent Stability Analysis
 - b. Static Rollover Threshold
 - c. Dynamic Load Transfer
 - d. Friction Demands
 - e. Braking Efficiency
 - f. Off-tracking
2. Required Unit Equipment Specifications
 - g. Lighting
 - h. Strobe Lighting
 - i. Under-ride Protection
 - j. Brake Systems
 - k. Radio Systems
 - l. Driver and Vehicle Monitoring Systems

- m. Preventative Maintenance Inspection Program
- n. Mud Flaps
- 3. Vehicle Operation and Safety Procedures
 - o. Hours of operation
 - p. Minimum Vehicle Separation on Highway
 - q. Minimum Vehicle Separation in School Zones
 - r. Minimum Vehicle Separation on Bridges
 - s. 3rd vehicle Passing Allowances
 - t. Public Information Programs
 - u. Truck Maintenance Programs
 - v. Driver Qualifications
 - w. Driver Safety Education Program
 - x. Driver Certification Requirements
 - y. List of Drivers
- 4. Other Conditions
 - z. Emergency Response
 - aa. Safety Supervisor
 - bb. Monitoring and Safety Equipment
 - cc. Department Monitoring
 - dd. Public Complaint Process

For bulk hauls on the Robert Campbell Highway, all inbound and outbound trucks must also report to the Watson Lake Weigh Scales. This allows Yukon Government Carrier Compliance personnel the opportunity to observe the vehicle and conduct vehicle safety inspections as necessary.

Since the introduction of the bulk haul regulations in 1994, bulk haul carriers have had a very good safety record. When you consider that the regulations allow 21% increase in weight, the corresponding decrease in the number of trucks required to carry the same volume is approximate 18%. Therefore, pursuing a bulk haul arrangement is in the interests of reducing truck traffic and formalizing safety requirements. The haulage contractor for the Project will be responsible for obtaining the Bulk Haul Permit and meeting the conditions therein. BMC will make the applicable bulk haul licence conditions, or portions thereof, standard for any non concentrate carrier who will be contracted with BMC.

4 COMMUNICATION AND PREVENTATIVE MEASURES

The aim of any plan is to minimize potential issues and develop processes that will minimize the impact of any unforeseen events. Regulations and permit conditions that proponents must adhere to are part of that process however so is communication, awareness, and training.

4.1 TRANSPORTATION WORKING GROUP

Prior to construction activity starting, BMC will form a Transportation Working Group and invite representatives from the Town of Watson Lake, Liard First Nation, Ross River Dena Council, Department of Highways and Public Works, and Emergency responders. It is envisioned the working group would meet twice yearly at a minimum or more often if the need arises.

The role of the working group will be to review the initial Traffic Management Plan as it relates to public highways, monitor ongoing operations, and recommend changes to the Traffic Management Plan as required. This group will also correspond with the Finlayson Caribou Herd Oversight Committee to ensure Decision Document Condition #10 (the portion that relates to traffic) and #42 are met.

4.2 PUBLIC COMMUNICATIONS

Prior to construction starting, BMC will begin a public information campaign to inform the public of what to expect in the way of traffic types and volumes. The messages will be modified as stages of the Project change. Methods to provide this information include:

- Community based Open Houses and information sessions;
- Established company social media channels;
- Radio ads on community stations;
- Newsletters and direct mail information sheets;
- Newspaper advertisements; and
- Variable message electronic sign boards at km 10 and km 234.

BMC will continue to maintain staffed offices in Ross River and Watson Lake and will encourage any member of the public with a complaint or concern about Project related traffic to submit a formal complaint through these offices as described in the Socio-economic Management Plan (BMC, 2026e). Any traffic related comments or complaints logged with BMC will be shared with the Transportation Working Group.

All complaints, formal and informal, will be logged in a complaints database as described in Section 5.5.

As noted in Section 3.2.11 the concentrate haulage contractor will also need a Public Complaint Process established as a condition of their Bulk Haul Agreement.

4.3 EMPLOYEE ORIENTATION

In addition to a detailed site orientation that all employees will be required to take prior to starting work, a specific Transportation Orientation will be given to all BMC employees who may be driving as part of their work duties prior to the first trip to site. This will be delivered as part of the employee onboarding process. The Transportation Orientation will include the same components as described in Section 4.4 (Contractors and Visitors).

4.4 CONTRACTORS AND VISITORS

All haulage contractors will be required to review the Traffic Management Plan and Emergency Response and Health and Safety Plan (BMC, 2026b) as a condition of their contract and the Plan will be included as an addendum to their contract. In addition, BMC will develop a specific Transportation Orientation that must be delivered to all contracted drivers prior to their first trip to site and contractors will be required to provide documentation to BMC demonstrating compliance. The Transportation Orientation will include:

- Route description and identification of community limits and school zones and speed limits;
- Wildlife protection measures;
- Wildlife incident areas updated through the Wildlife Management Plan;
- Radio procedures and protocols;
- Pullout locations and passing protocols;
- Emergency response procedures;

Official visitors to site will be required to be registered with BMC in advance of their visit. All visitors will receive the same Transportation Orientation as contractors. Where possible the Transportation Orientation will be provided in advance of the planned trip to site.

When visitors or inspectors arrive at the Gatehouse without having taken the Transportation Orientation they will first be cleared for access to site and if allowed then given an Access Road specific orientation that will include:

- Access Road description including identification of areas of known wildlife sightings, and ongoing maintenance activity;
- Wildlife protection measures;
- Wildlife incident areas updated through the Wildlife Management Plan;
- Radio procedures and protocols;
- Pullout locations;
- Emergency response procedures;

Where visitors do not have a radio with BMC assigned frequencies, BMC Gatehouse staff will provide portable radios for use during transit to and from site.

5 INSPECTIONS, DOCUMENTATION AND REPORTING

5.1 VEHICLE MOVEMENTS

All vehicle movements will be documented and recorded at the Gatehouse and Camp as to type (concentrate haul, re-supply, service vehicle, pick-up, visitor etc).

Vehicle movements will be entered into a database on a daily basis.

5.2 WILDLIFE INTERACTIONS

All large wildlife (i.e. caribou moose, bear, wolf etc.) interactions along the Access Road will be recorded using the Wildlife Incident form. Forms will be collected at the Gatehouse and at Camp and will be submitted to the Environment Department at site for logging in the wildlife database.

5.3 INCIDENT RESPONSE

BMC has a detailed Emergency Response and Health and Safety Plan (BMC, 2026b), a Hazardous Materials Management Plan (BMC, 2026c), a Spill Contingency Plan (BMC, 2026f) and a Wildlife Protection Plan (BMC, 2026g) Where incidents occur these plans will take precedence over the Traffic Management Plan for response and reporting requirements.

5.4 ACCIDENT REPORTING

All accidents not requiring activation of the Hazardous Materials Management Plan (BMC, 2026c), or Spill Contingency Plan (BMC, 2026f) will be reported as per the requirements of the Emergency Response and Health and Safety Plan (BMC, 2026b) and any applicable legislation.

Where Project traffic observes a highway accident, location and details as known will be provided to the on-site Health and Safety office.

5.5 COMPLAINT MANAGEMENT

BMC will have a toll-free telephone number assigned for public complaints as well as an email address dedicated to the same purpose. BMC will also accept verbal complaints at any of its offices in Whitehorse, Ross River or Watson Lake.

All complaints received will be documented and entered into a complaint tracking database for follow-up. Complaints will be immediately forwarded to the relevant BMC representative for follow-up as required. The database will include:

- Date and time of complaint;
- Method complaint was received;
- Personal contact information of complainant if provided;
- Details of the complaint specifics;
- Action taken and any follow-up contact with the complainant; and

- If no action was taken as a result of the complaint, detail as to why.

5.6 VEHICLE INSPECTIONS

All vehicles under BMC control will have a regularly scheduled maintenance program to ensure they are always functioning to the manufacturer's specifications. Contractors and suppliers will be responsible for ensuring maintenance of their light fleets to the standard required.

In addition, all heavy commercial vehicles operating on public highways inside and outside the Yukon must have a Periodic Motor Vehicle Inspection (PMVI) for both tractors and trailers. Tractor units must have a PMVI done by a certified technician at a licenced inspection facility every 6 months while trailers must be inspected every 12 months. PMVI inspections are required for every vehicle that meets the following criteria:

- Vehicle operates outside Yukon and carrier and goods have a combined weight of over 4,500 kilograms;
- Vehicle operates inside or outside Yukon and carrier and goods have a combined weight of over 11,794 kilograms; or
- Operating a passenger-carrying vehicle that seats 10 or more passengers, including the driver.

The PMVI inspection follows the criteria established under the *National Safety Code* as described in Section 1.2. *National Safety Code Standard 11 – Maintenance and Periodic inspection Standards* details the components that must be inspected on a semi annual or annual basis. These include:

- Power train including engine controls such as catalytic converters.
- Suspension – axel and axel assembly and air suspension mechanisms.
- Hydraulic and electric brake systems
- Air Brakes
- Steering
- Instruments and auxiliary equipment
- Lamps
- Electrical systems
- Body and chassis
- Tires and wheels
- Coupling devices

Vehicles operating without a valid and current PMVI are liable for sanctions in accordance with the requirements of the Motor vehicles Act.

In addition, the Transport Services Branch of the Department of Highways and Public Works conducts random safety checks on heavy trucks at weigh scales throughout the year. Where vehicles are found to be in non-compliance the vehicle may be prevented from re-entering the highway until needed repairs are made, or the repairs will need to be made within a given period and proof of the repairs presented to a Compliance Officer. Transport Services also participates in annual safety blitzes under the Commercial Vehicle Safety Alliance a North American wide organization of Motor Vehicle Administrators and Law Enforcement Agencies.

6 ACCIDENT RESPONSE

Accident response procedures are outlined in:

- Hazardous Materials Management Plan (BMC, 2026c);
- Wildlife Protection Plan (BMC, 2026g); and
- Spill Contingency Plan (BMC, 2026f).

7 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 ensuring the periodic review and update of the Plan. The Project/Mine Manager shall work closely with the Health and Safety Manager and the Environmental Manager to accomplish this.

8 REFERENCES

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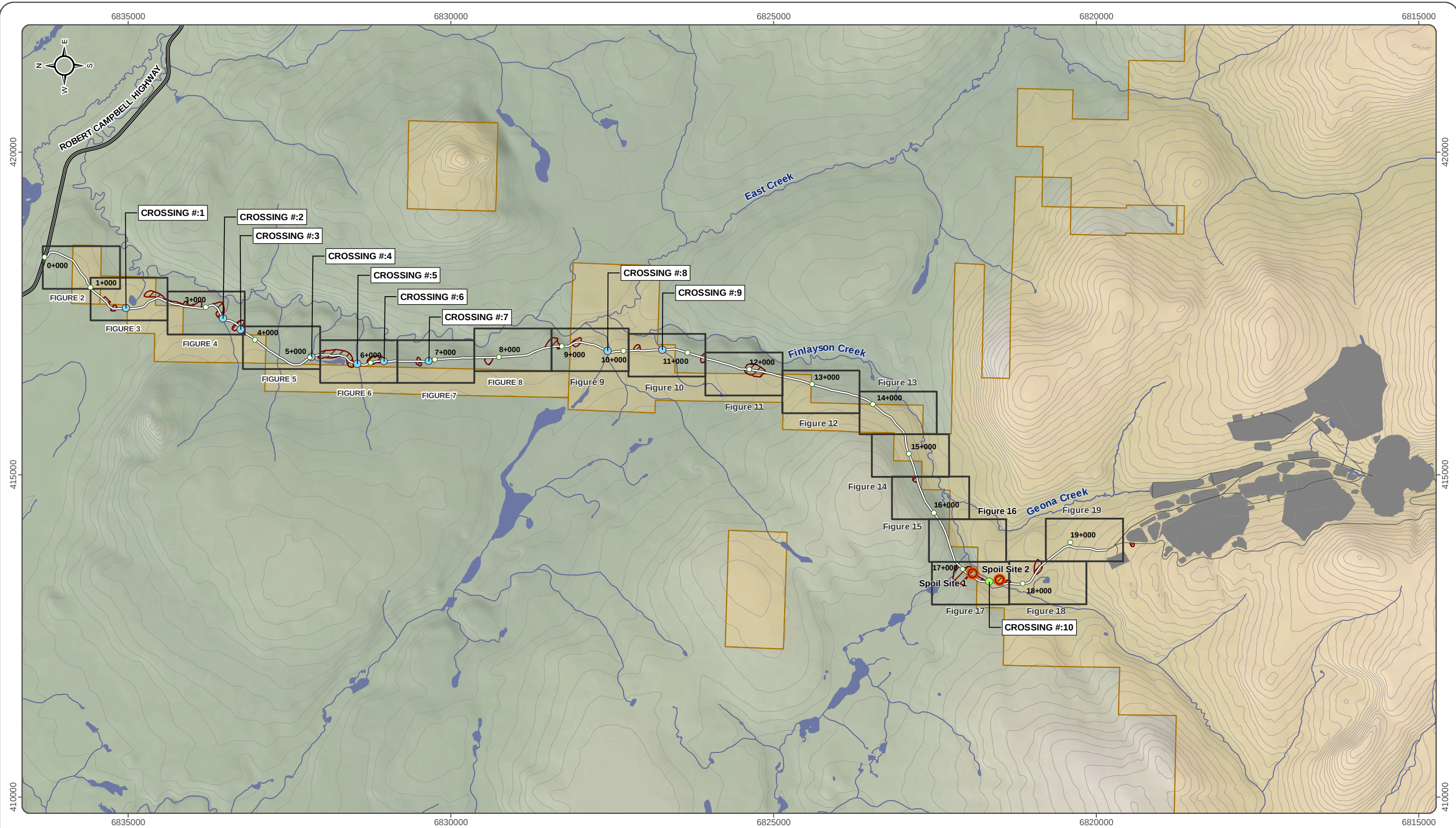
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Yukon Government (YG). 2007. *National Safety Code Regulations*. OIC 2007/168

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APPENDIX A: KZK ACCESS ROAD SITE PLAN



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1:55,000 (when printed on 11 x17 inch paper)

0 1 2 3 Kilometres

- Station Markers
- Stream Crossing Non Fish Bearing (Culvert)
- Stream Crossing Fish Bearing (Bridge)
- Proposed Spoil Storage Site

- Potential Borrow Area
- Location of Proposed Infrastructure
- BMC Minerals (No.1) Ltd. Mineral Claim Areas (Claims Along the Road Alignment are Currently not Surveyed)
- Figure Index Extent

- Tote Road/Proposed Access Road
- Proposed Mine Road
- Robert Campbell Highway
- Contour (20m interval)
- Watercourse
- Waterbody



KUDZ ZE KAYAH PROJECT

FIGURE 1 APPENDIX A

AUGUST 2020

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 1:3,000 (when printed on 11 x17 inch paper)

0 50 100 150 Meters

- | | | | | | |
|---|--|---|---|---|----------------------------------|
|  | Station Markers |  | 20 m Existing Right of Way (Lease 105G07-001) |  | Map Extent |
|  | Stream Crossing Non Fish Bearing (Culvert) |  | 30 m Proposed Right of Way |  | Proposed Access Road Center Line |
|  | Stream Crossing Fish Bearing (Bridge) |  | Potential Borrow Area |  | Robert Campbell Highway |
|  | Proposed Spoil Storage Site |  | Location of Proposed Mine Infrastructure |  | Watercourse |
| | |  | BMC Minerals (No.1) Ltd. Mineral Claim Areas |  | Contours (5 m Interval) |



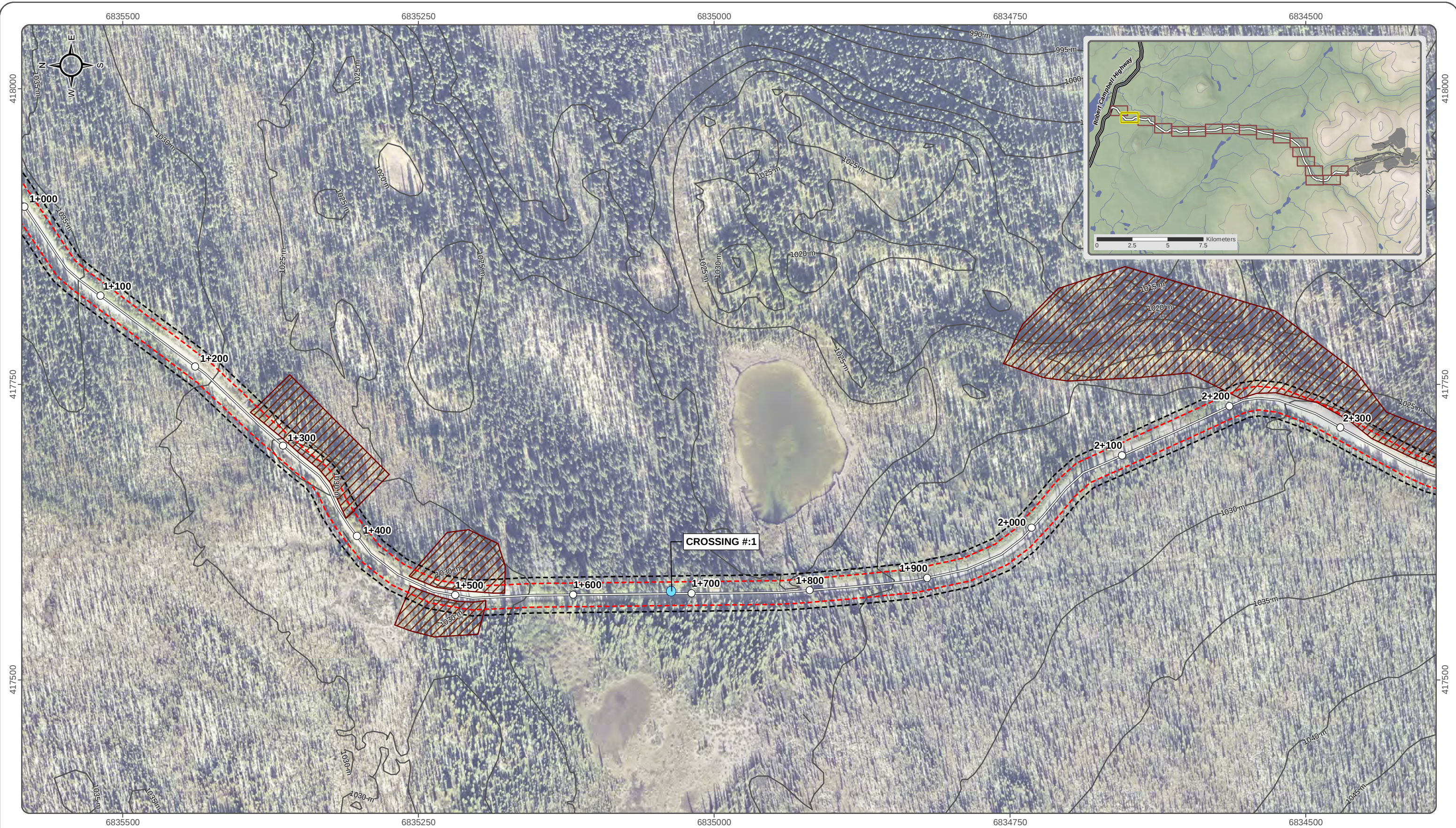
KUDZ ZE KAYAH PROJECT

FIGURE 2

APPENDIX A

AUGUST 2020

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|---|--|---|---|---|----------------------------------|
|  | Station Markers |  | 20 m Existing Right of Way (Lease 105G07-001) |  | Map Extent |
|  | Stream Crossing Non Fish Bearing (Culvert) |  | 30 m Proposed Right of Way |  | Proposed Access Road Center Line |
|  | Stream Crossing Fish Bearing (Bridge) |  | Potential Borrow Area |  | Robert Campbell Highway |
|  | Proposed Spoil Storage Site |  | Location of Proposed Mine Infrastructure |  | Watercourse |
| | |  | BMC Minerals (No.1) Ltd. Mineral Claim Areas |  | Contours (5 m Interval) |



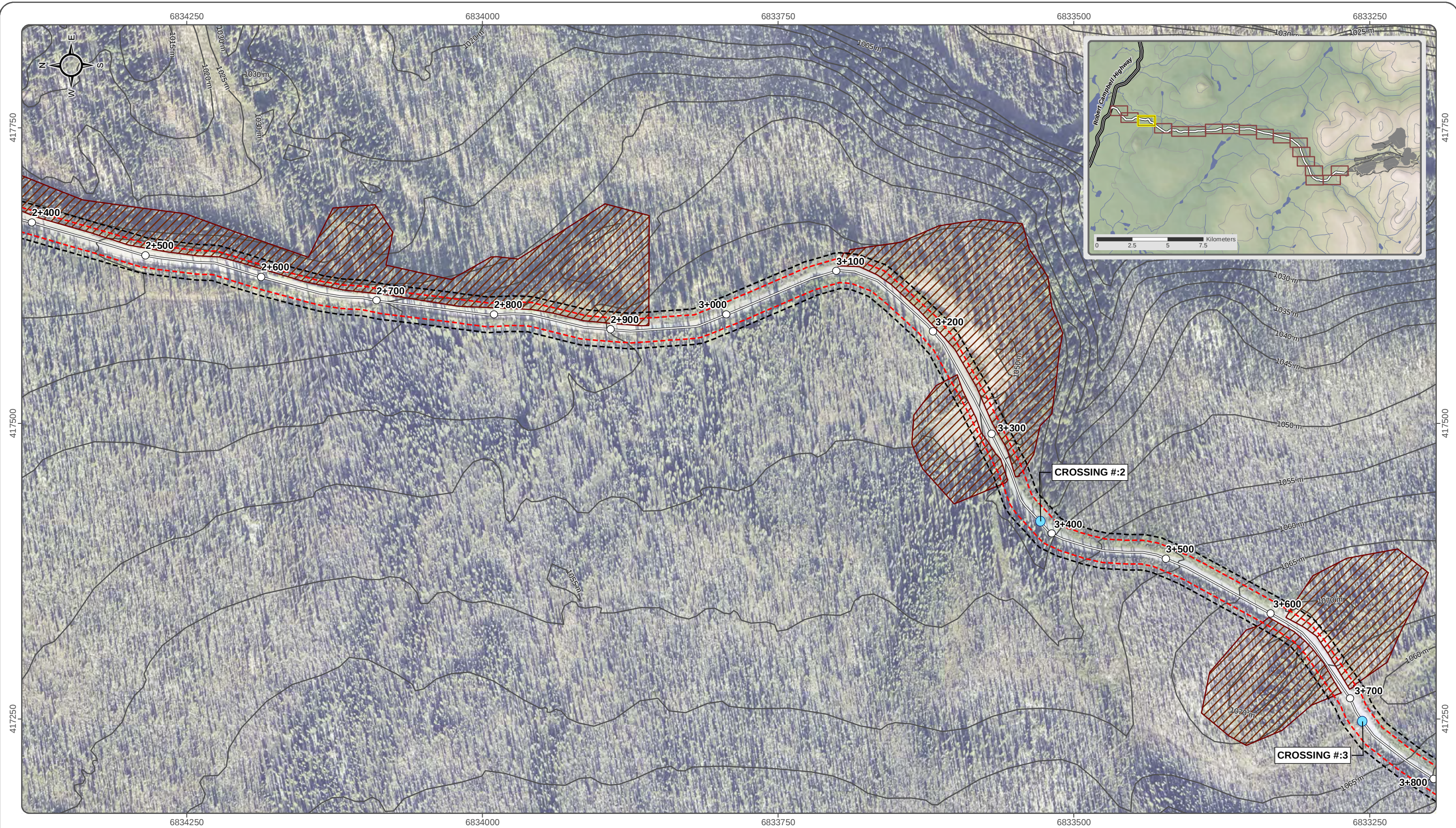
KUDZ ZE KAYAH PROJECT

FIGURE 3

APPENDIX A

AUGUST 2020

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|  Station Markers |  20 m Existing Right of Way (Lease 105G07-001) |  Map Extent |
|  Stream Crossing Non Fish Bearing (Culvert) |  30 m Proposed Right of Way |  Proposed Access Road Center Line |
|  Stream Crossing Fish Bearing (Bridge) |  Potential Borrow Area |  Robert Campbell Highway |
|  Proposed Spoil Storage Site |  Location of Proposed Mine Infrastructure |  Watercourse |
| |  BMC Minerals (No.1) Ltd. Mineral Claim Areas |  Contours (5 m Interval) |



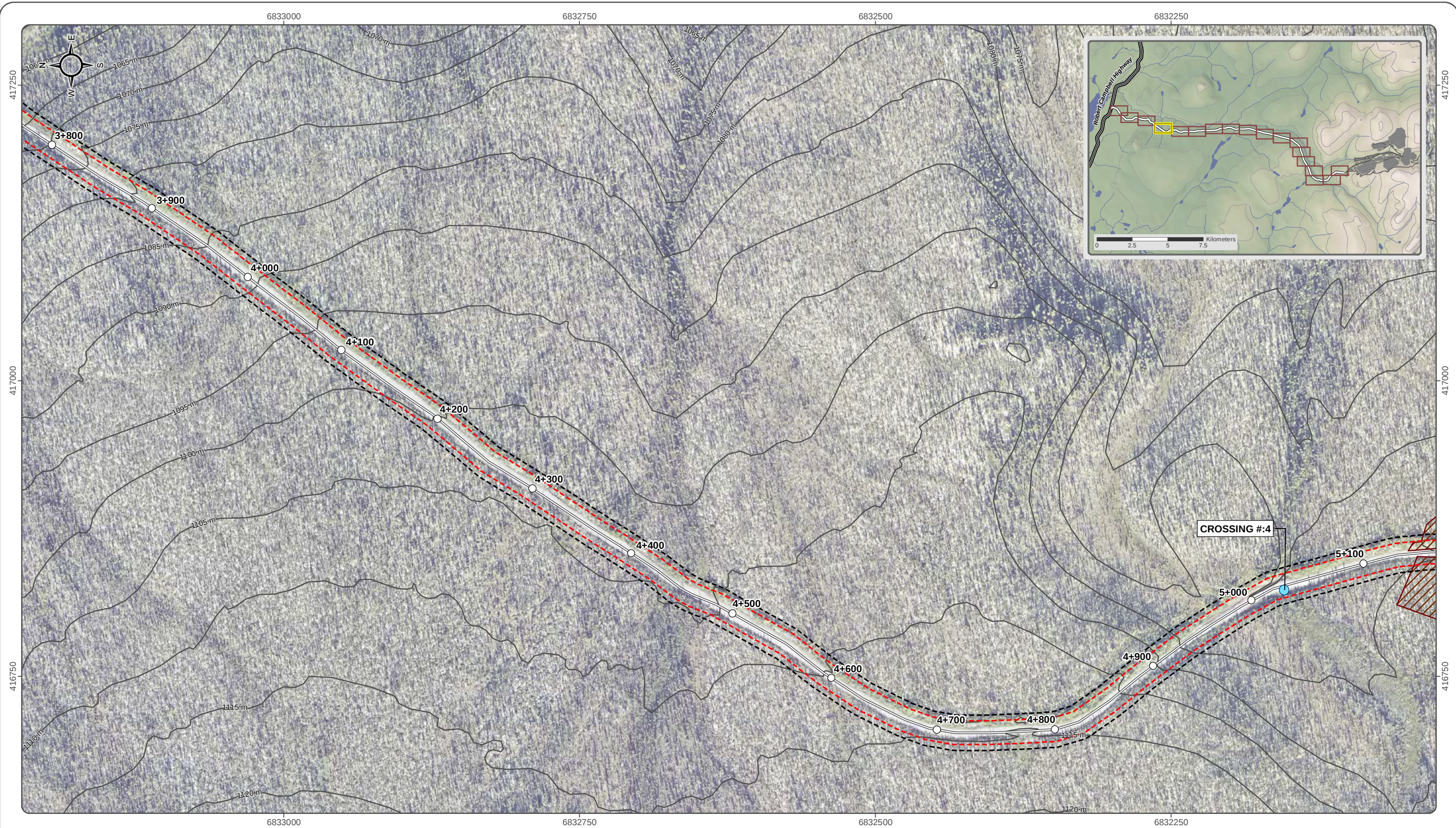
KUDZ ZE KAYAH PROJECT

FIGURE 4

APPENDIX A

AUGUST 2020

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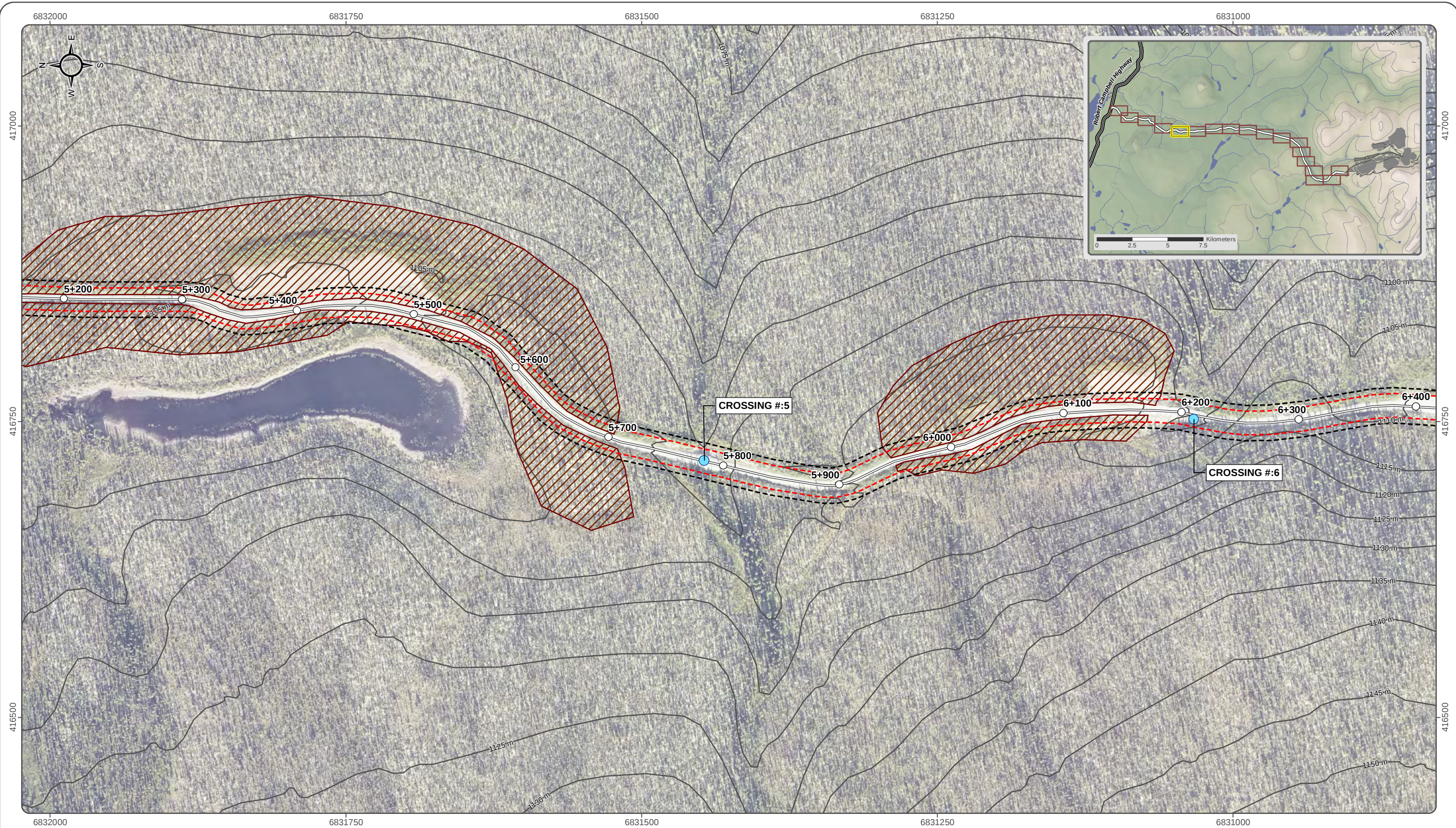
0 50 100 150 Meters

- Station Markers
- Stream Crossing Non Fish Bearing (Culvert)
- Stream Crossing Fish Bearing (Bridge)
- Proposed Spoil Storage Site

- 20 m Existing Right of Way (Lease 105G07-001)
- 30 m Proposed Right of Way
- Potential Borrow Area
- Location of Proposed Mine Infrastructure
- BMC Minerals (No.1) Ltd. Mineral Claim Areas

- Map Extent
- Proposed Access Road Center Line
- Robert Campbell Highway
- Watercourse
- Contours (5 m Interval)





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|  Station Markers |  20 m Existing Right of Way (Lease 105G07-001) |  Map Extent |
|  Stream Crossing Non Fish Bearing (Culvert) |  30 m Proposed Right of Way |  Proposed Access Road Center Line |
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|  Proposed Spoil Storage Site |  Location of Proposed Mine Infrastructure |  Watercourse |
| |  BMC Minerals (No.1) Ltd. Mineral Claim Areas |  Contours (5 m Interval) |



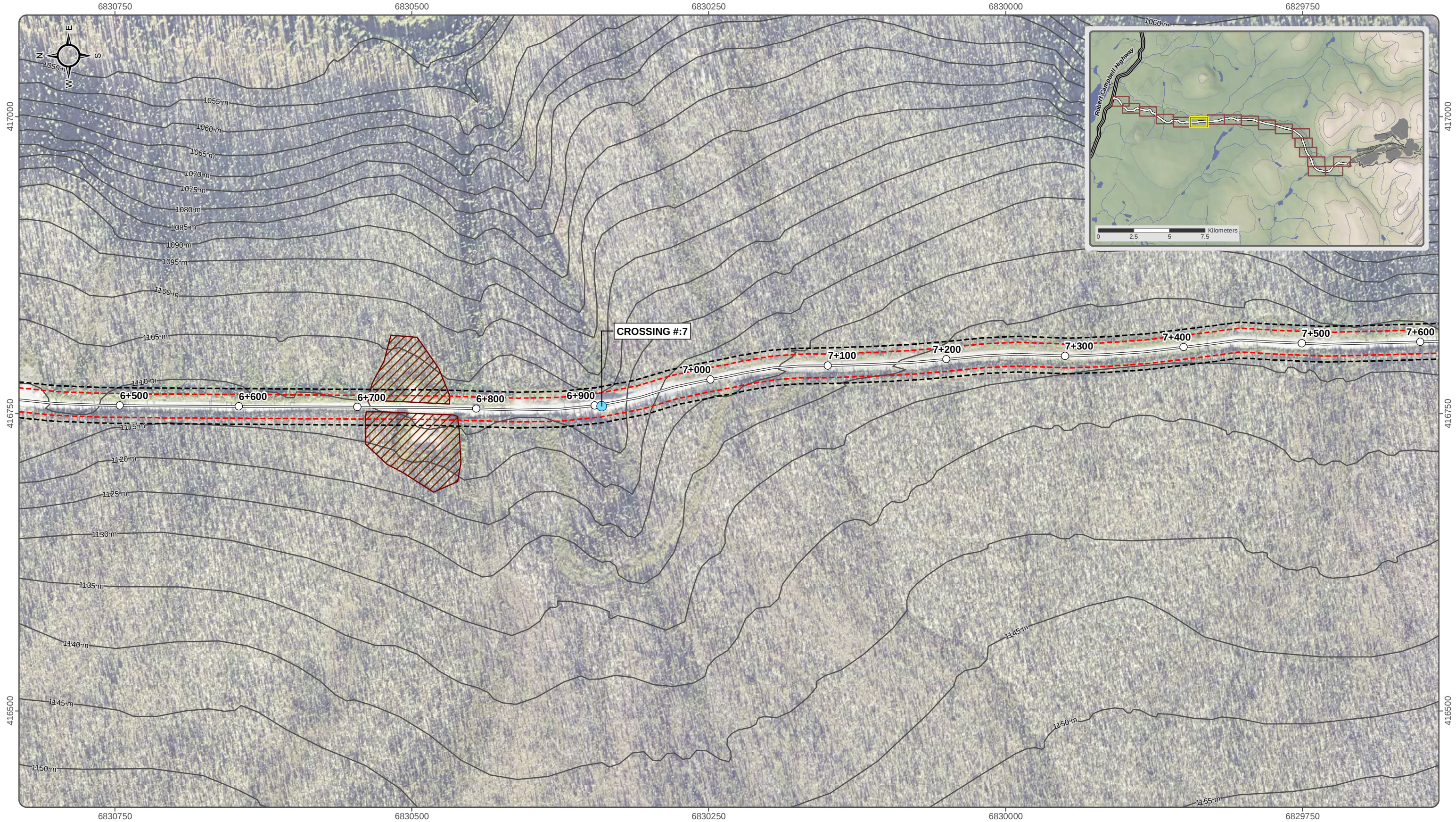
KUDZ ZE KAYAH PROJECT

FIGURE 6

APPENDIX A

AUGUST 2020

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- Station Markers
- Stream Crossing Non Fish Bearing (Culvert)
- Stream Crossing Fish Bearing (Bridge)
- Proposed Spoil Storage Site

- - - 20 m Existing Right of Way (Lease 105G07-001)
- - - 30 m Proposed Right of Way
- ▨ Potential Borrow Area
- Location of Proposed Mine Infrastructure
- BMC Minerals (No.1) Ltd. Mineral Claim Areas

- ▭ Map Extent
- Proposed Access Road Center Line
- == Robert Campbell Highway
- Watercourse
- Contours (5 m Interval)

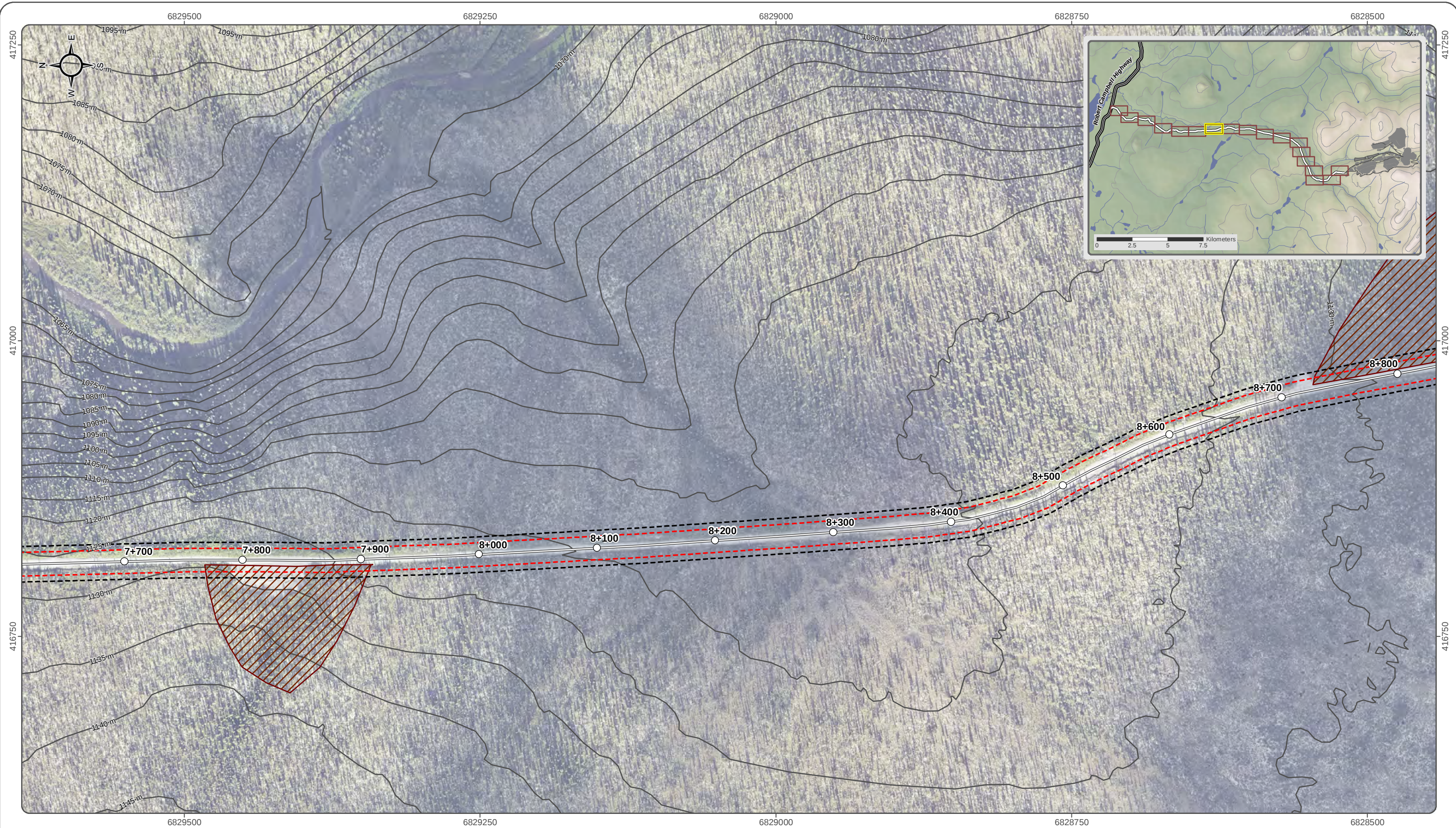


KUDZ ZE KAYAH PROJECT

FIGURE 7
APPENDIX A

AUGUST 2020

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|---|--|---|---|---|----------------------------------|
|  | Station Markers |  | 20 m Existing Right of Way (Lease 105G07-001) |  | Map Extent |
|  | Stream Crossing Non Fish Bearing (Culvert) |  | 30 m Proposed Right of Way |  | Proposed Access Road Center Line |
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|  | Proposed Spoil Storage Site |  | Location of Proposed Mine Infrastructure |  | Watercourse |
| | |  | BMC Minerals (No.1) Ltd. Mineral Claim Areas |  | Contours (5 m Interval) |



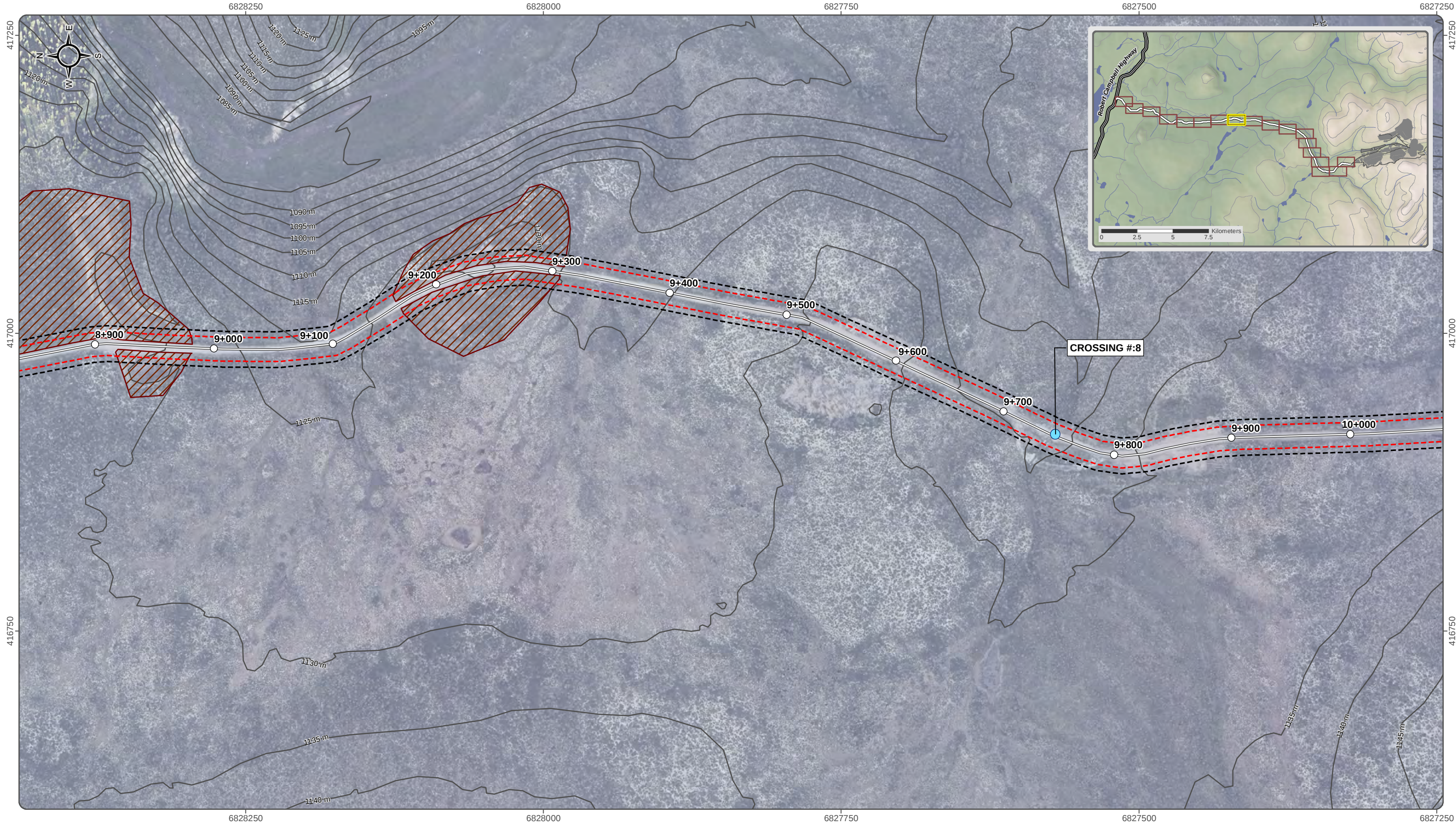
KUDZ ZE KAYAH PROJECT

FIGURE 8

APPENDIX A

AUGUST 2020

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 1:3,000 (when printed on 11 x17 inch paper)

0 50 100 150 Meters

- Station Markers
- Stream Crossing Non Fish Bearing (Culvert)
- Stream Crossing Fish Bearing (Bridge)
- Proposed Spoil Storage Site
- 20 m Existing Right of Way (Lease 105G07-001)
- 30 m Proposed Right of Way
- ▨ Potential Borrow Area
- Location of Proposed Mine Infrastructure
- BMC Minerals (No.1) Ltd. Mineral Claim Areas

- Map Extent
- Proposed Access Road Center Line
- == Robert Campbell Highway
- Watercourse
- Contours (5 m Interval)



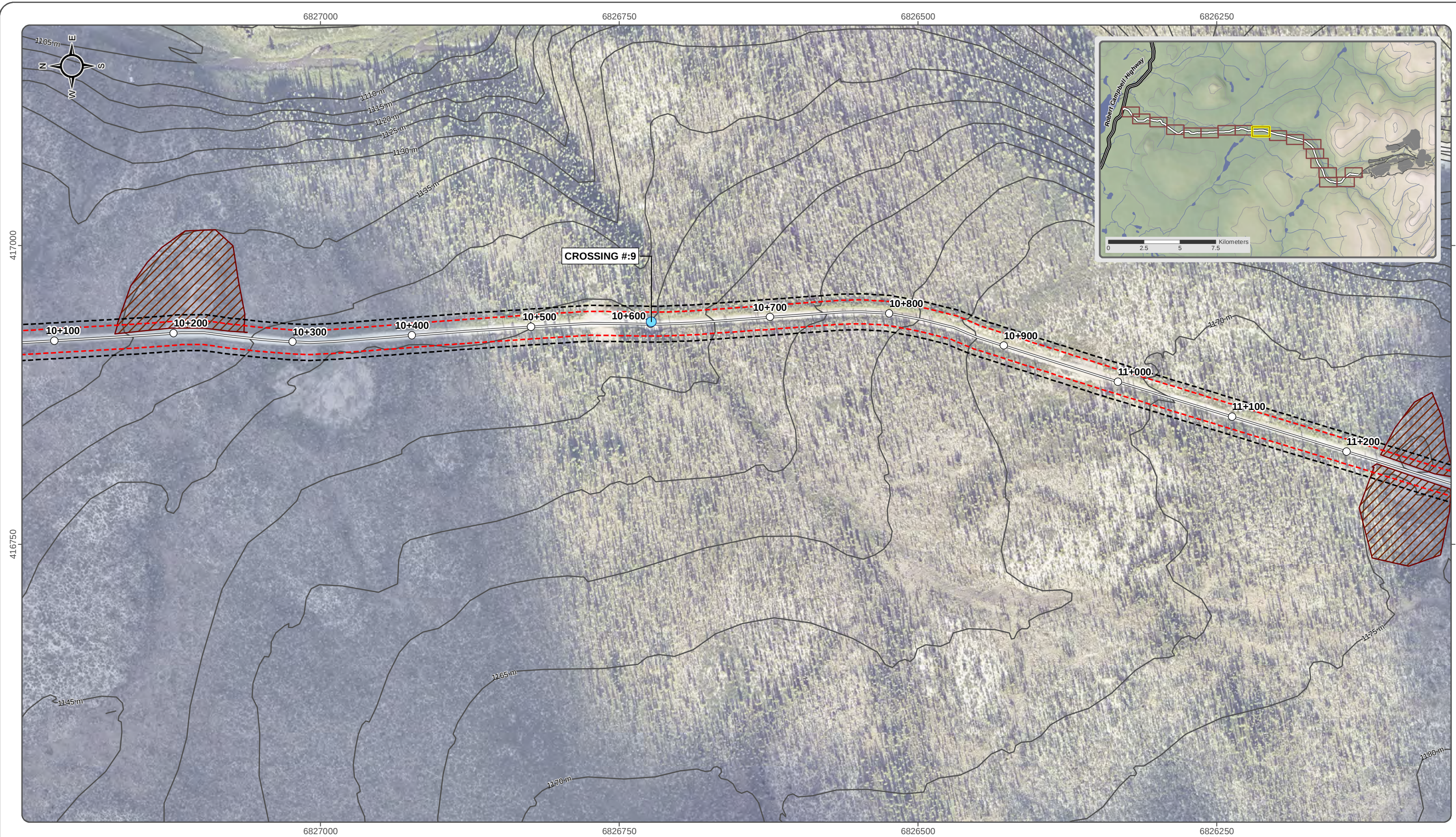
KUDZ ZE KAYAH PROJECT

FIGURE 9

APPENDIX A

AUGUST 2020

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|  | Station Markers |  | 20 m Existing Right of Way (Lease 105G07-001) |  | Map Extent |
|  | Stream Crossing Non Fish Bearing (Culvert) |  | 30 m Proposed Right of Way |  | Proposed Access Road Center Line |
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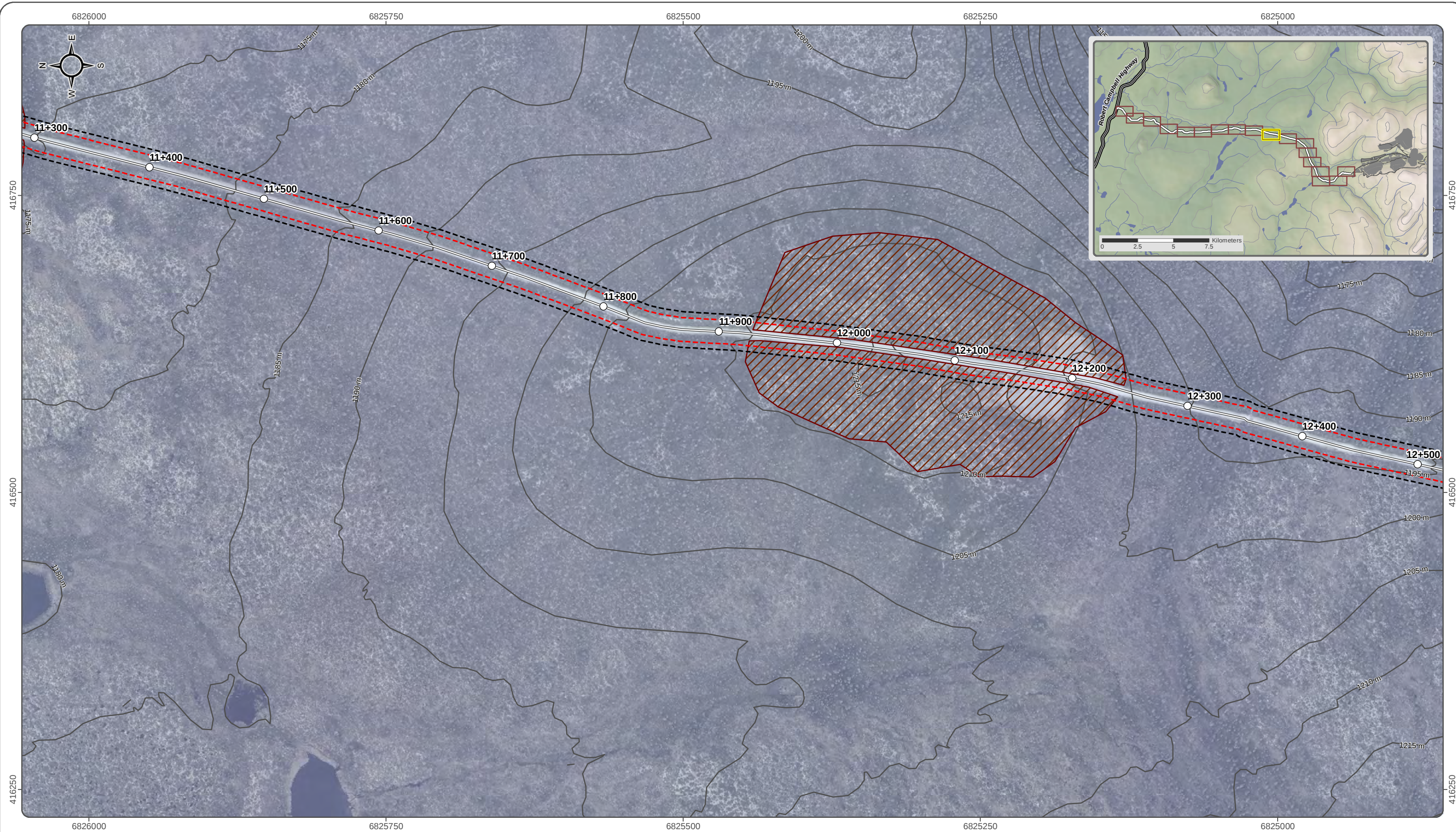
KUDZ ZE KAYAH PROJECT

FIGURE 10

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| ○ Proposed Spoil Storage Site | Location of Proposed Mine Infrastructure | — Watercourse |
| | BMC Minerals (No.1) Ltd. Mineral Claim Areas | — Contours (5 m Interval) |



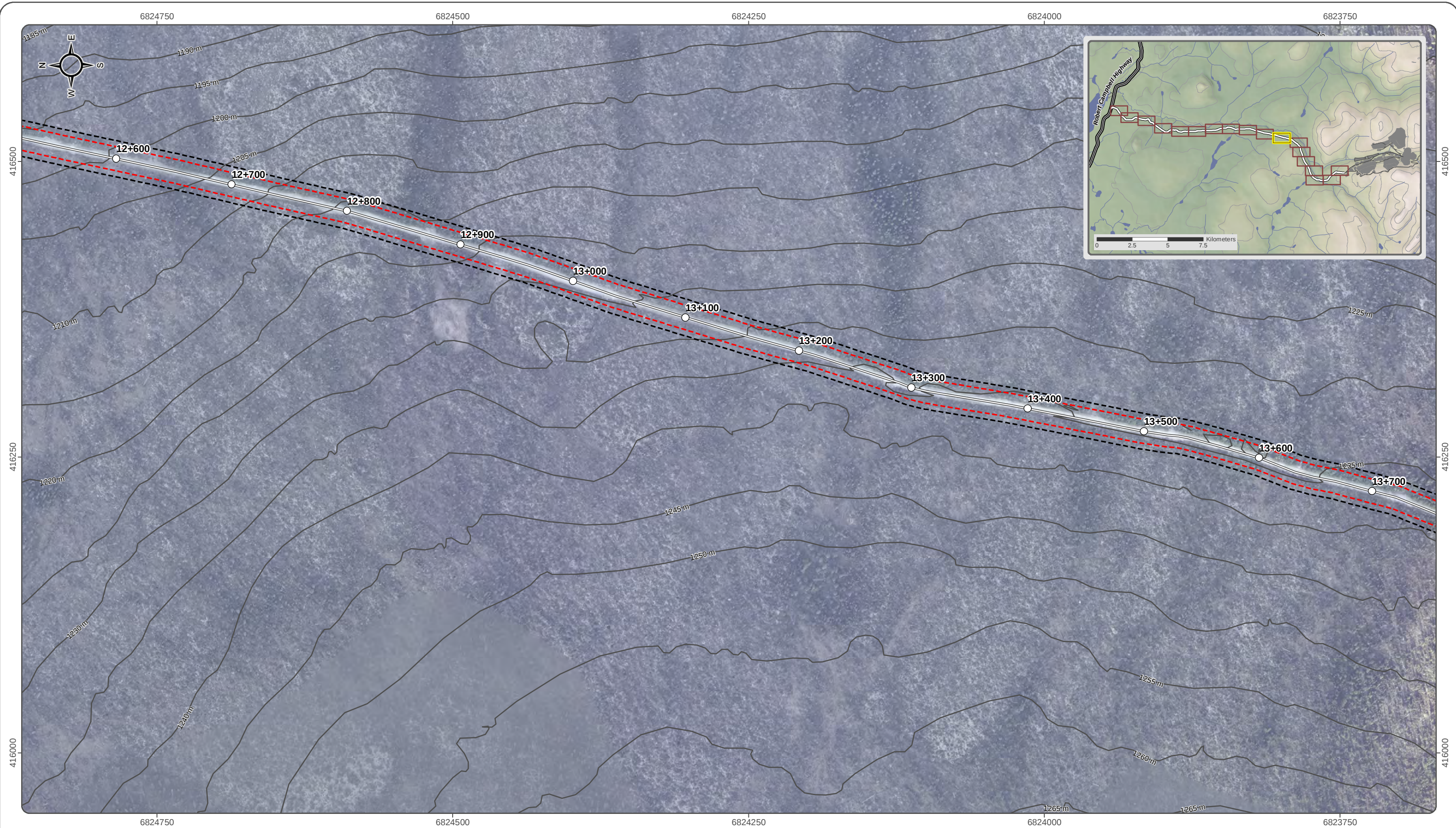
KUDZ ZE KAYAH PROJECT

FIGURE 11

APPENDIX A

AUGUST 2020

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KUDZ ZE KAYAH PROJECT

FIGURE 12

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-  Station Markers
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-  Robert Campbell Highway
-  Watercourse
-  Contours (5 m Interval)



KUDZ ZE KAYAH PROJECT

FIGURE 13

APPENDIX A

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KUDZ ZE KAYAH PROJECT

FIGURE 14 APPENDIX A

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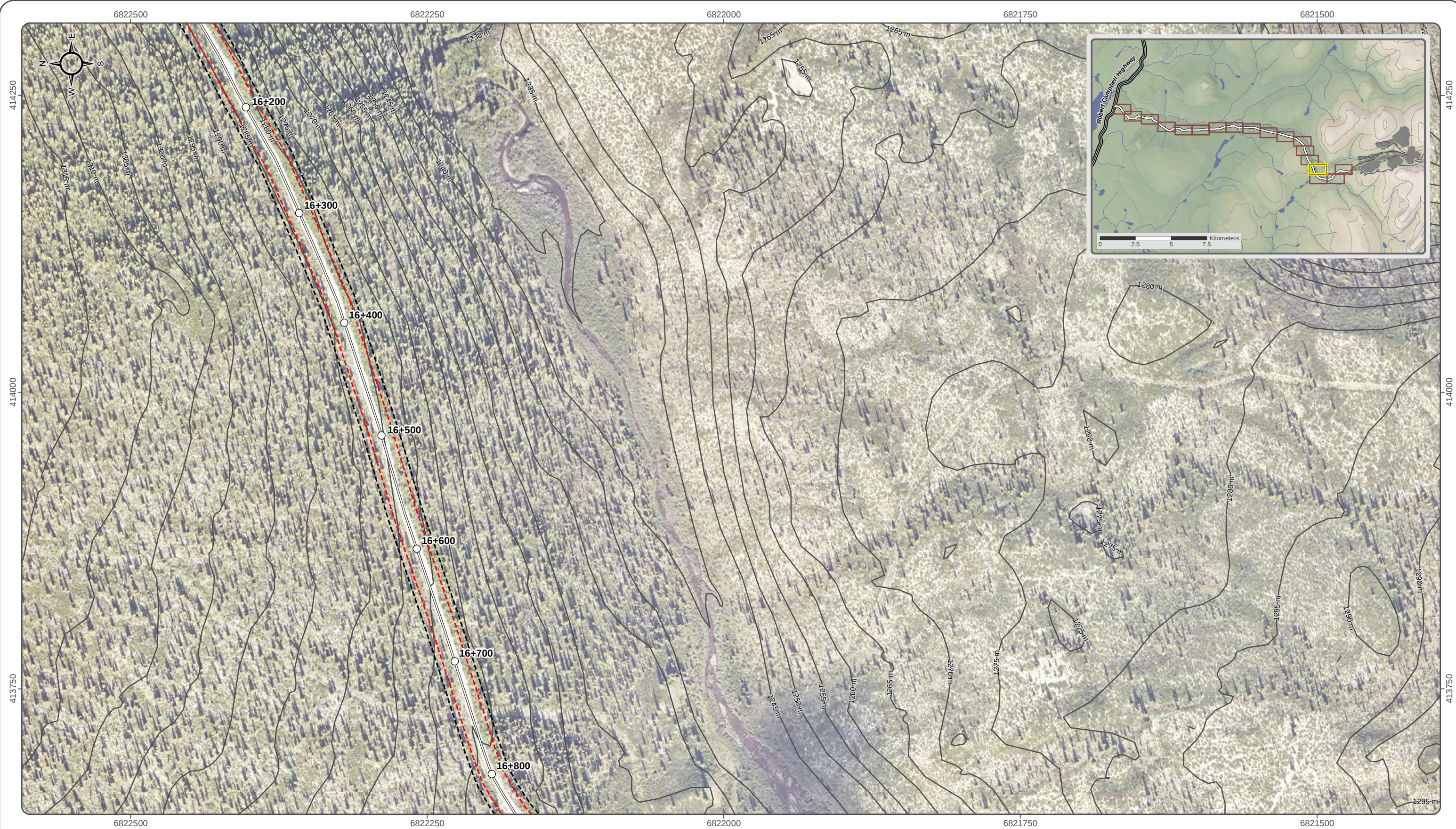


KUDZ ZE KAYAH PROJECT

FIGURE 15
APPENDIX A

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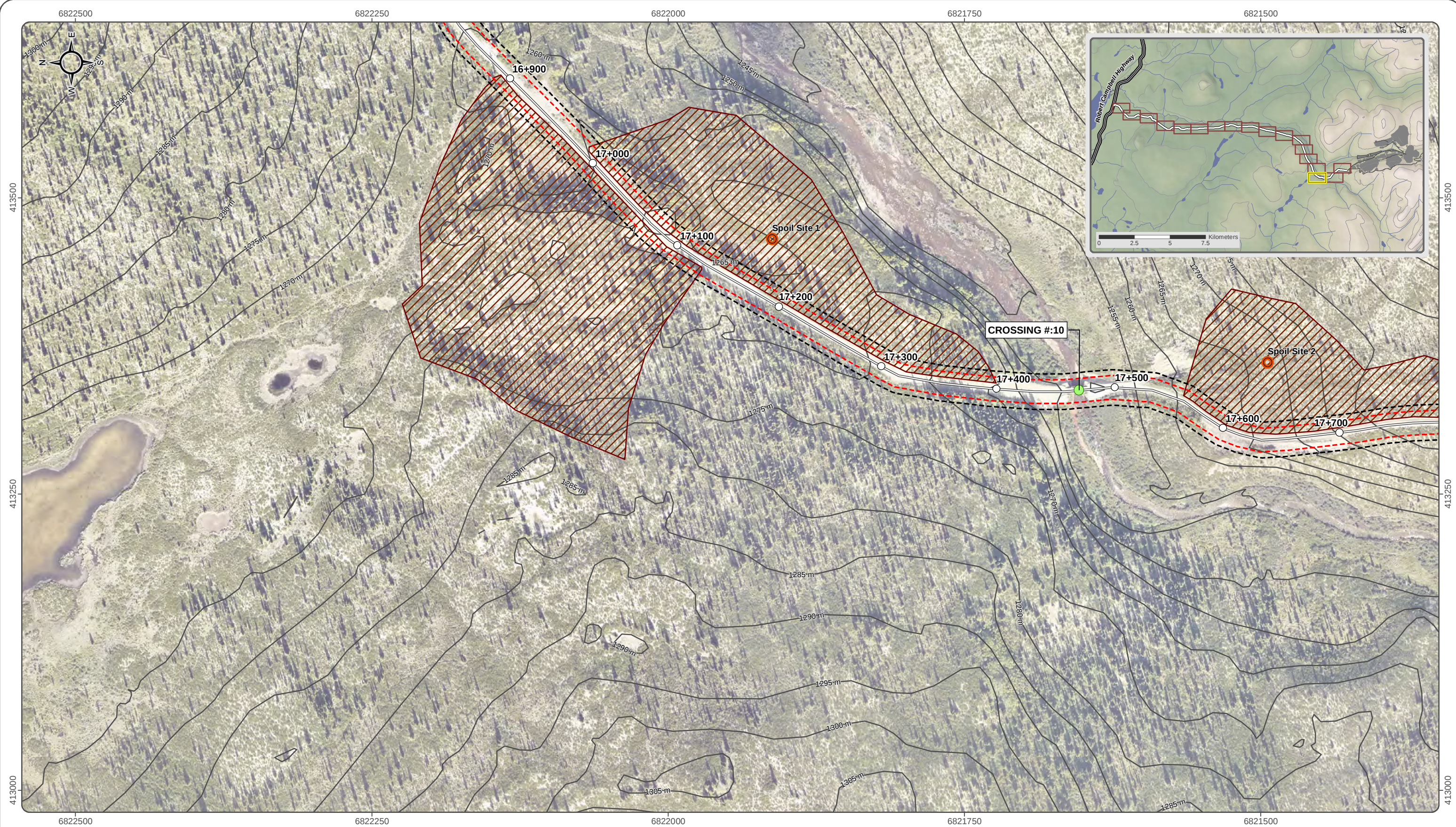


KUDZ ZE KAYAH PROJECT

FIGURE 16 APPENDIX A

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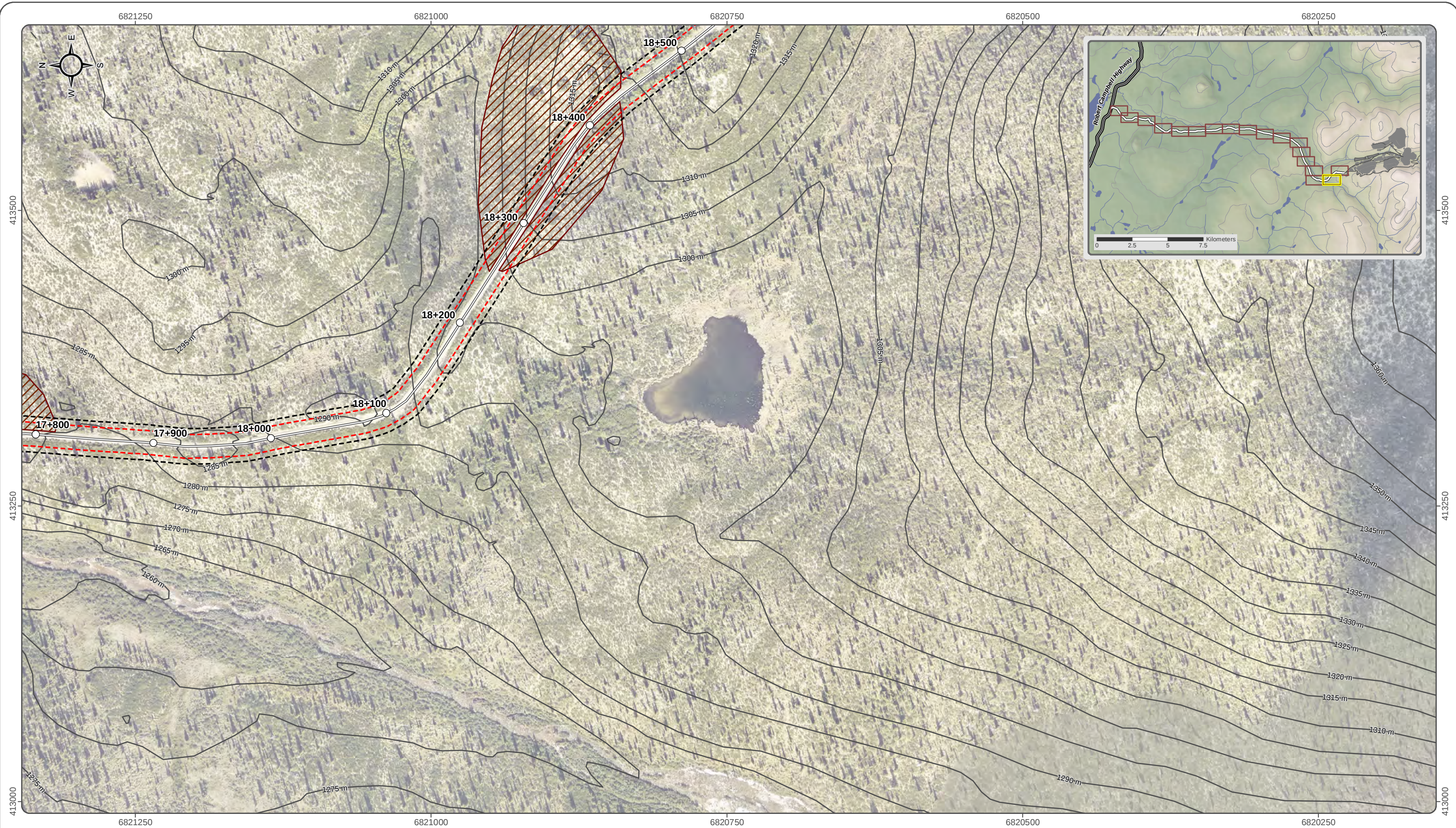


KUDZ ZE KAYAH PROJECT

FIGURE 17 APPENDIX A

AUGUST 2020

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|  | Proposed Spoil Storage Site |  | Location of Proposed Mine Infrastructure |  | Watercourse |
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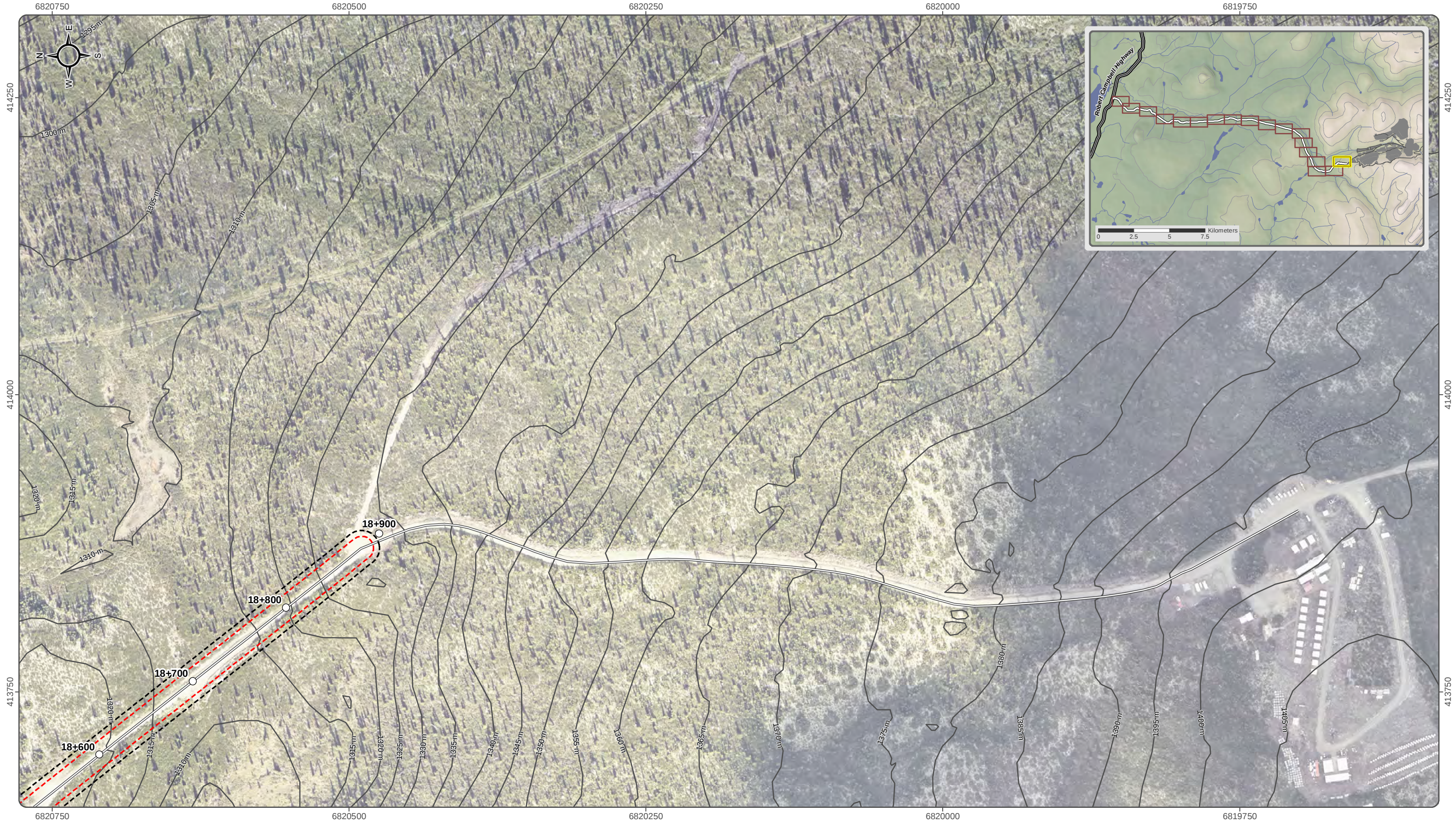
KUDZ ZE KAYAH PROJECT

FIGURE 18

APPENDIX A

AUGUST 2020

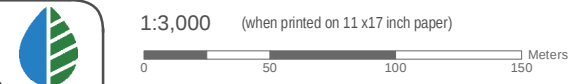
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- Station Markers
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- Robert Campbell Highway
- Watercourse
- Contours (5 m Interval)



KUDZ ZE KAYAH PROJECT

FIGURE 19 APPENDIX A

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APPENDIX B: TABLE OF CONCORDANCE

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 6 (BMC, 2017a)	Ensure vehicles and equipment are maintained according to manufacturers' guidelines.	Section 5.6 of Traffic Management Plan
Project Proposal Chapter 6 (BMC, 2017a)	Use catalytic control systems on diesel engines.	Section 5.6 of Traffic Management Plan
Project Proposal Chapter 7 (BMC, 2017a)	Impose speed limits for all vehicles.	Section 3.1.4 and 3.2.2 of Traffic Management Plan
Project Proposal Chapter 7 (BMC, 2017a)	Avoid engine idling.	Section 3.1.8 of Traffic Management Plan
Project Proposal Chapter 18 (BMC, 2017a)	The impacts of the increased truck transportation due to concentrate haulage will be mitigated in part through the Traffic and Access Management Plan (Section 18.12 of the Project Proposal). This plan includes BMC's commitment to contracting a qualified trucking firm that will: - o Use only experienced, professional drivers; - o Equip all trucks with two-way radio communications; and - o Implement design, safety and operating procedures proven by similar trucking systems utilized in Yukon and Canada. Risks from hazardous materials and from spills will be mitigated through the application of the Hazardous Materials Management Plan (Section 18.3 of the Project Proposal) and Spill Contingency Plan (Section 18.5 of the Project Proposal).	Chapter 3 and 4 of Traffic Management Plan
Response Report #1 (BMC, 2017b)	Any school bus zones that occur along the truck route will be identified as part of driver orientation and training program prior to the first trip of any new drivers. New driver orientation sessions will also include briefings on known high incidence areas of wildlife crossings along the route, which will be updated with new sightings as they occur as part of the Wildlife Management Plan.	Sections 3.2.9 and 4.3 of Traffic Management Plan
Response Report #3A (BMC, 2018a)	Prior to construction and operations BMC commits to discuss with the local communities BMC's preliminary plans and request any suggestions on ways to assist with managing the increased traffic to maximize safety and minimize disruptions that they may have.	Section 4.1 of Traffic Management Plan
Response Report #3A (BMC, 2018a)	BMC will have some control over the actions of certain portions of the traffic using the highway such as the haulage trucks, supply trucks, and light vehicles driven by employees, and contractors, of BMC. However, BMC has no control over other users of the roads and must rely on these users to abide by Yukon's road rules and to drive in a manner that takes into consideration road conditions. With this limited control it may be possible to mitigate some of the potential safety concerns: - o Communications: All Project related heavy traffic on the Robert Campbell Highway will be equipped with radio communication. The radios will be used to advise of relative positions on the highway and advise others about oncoming traffic and road conditions. These radios can also be used to call for assistance if there have been mechanical or road problems. This communication network could also be of advantage to non-company users of the road in cases where assistance is needed, and no communication is available due to the lack of cell coverage on the highway. - o There are limited locations where vehicles can pass traffic going in the same direction safely, as the road has numerous blind curves and is generally too narrow for safe overtaking. Prior to construction and operations, the locations of safe passing zones will be identified, and drivers associated with the Project will be advised of these locations. A list will be provided and appropriate actions to take at the passing areas will be outlined. These actions may include reducing speed, or even stopping, to allow traffic to pass at these locations. - o Dust can be reduced by limiting the speeds of vehicles travelling the road however this also could lead to unsafe passing by traffic travelling in the same direction. Vehicles will be advised to allow other users to pass as early as it is safe	Sections 3.1, 3.2 and 4.1 of Traffic Management Plan

Reference No.	Proponent Commitment / Mitigation	Where addressed
	to do. Yukon Highways can help limit this problem by judicious use of chemical sealants. Chemical sealants may also decrease the overall cost of road maintenance if applied correctly. - o Traffic travelling on the Robert Campbell Highway will have to pass approximately 4 Project related heavy vehicles travelling in the opposite direction when driving on the stretch of the highway under discussion. Radio communications will warn the trucks of oncoming traffic however there will be no warning for private vehicles and other road users. Prior to construction and operations, it is suggested that BMC travels a number of times to the local communities and asks for their suggestions on ways to assist with managing the increased traffic to maximize safety. - o One possible way to limit encounters on the highway is for the trucks to travel in convoys rather than individually. This, however, can also lead to increased safety issues both for opposing traffic and passing traffic. This is an area where community input will be requested and where there may need to be trials to evaluate the effectiveness of each strategy. - o Increased traffic will degrade road conditions more rapidly than at present. The worsening can be minimized by reducing the speed that traffic uses the road and using proper driving techniques such as; minimizing the use of brakes and selecting appropriate gears on sections with steep grades. The company and contract drivers using the road will have appropriate skillsets and training on handling large vehicles on gravel roads. - o Yukon Highways, and contractors working for them, are continually upgrading and maintaining the highway and BMC realizes that communications with the various work crews is essential. BMC commits to maintaining communications with Yukon Highways at all stages of the Project and working with them to minimize disruption to their projects. This will mean informing Highways of trucking schedules and may mean scheduling trucking to certain times of the day to minimize effects on the various activities. - o Winter driving: In winter the drivable width of the highway may be decreased due to high snow amounts and the associated snow plowing activities by the Highways Department. This will increase the risk to all travel on the highway. There will be less non Project related traffic on the highway however the decreased road widths will mean that extra restrictions may have to be implemented. This could include speed restrictions applied to company traffic as well as more frequent mapping of potential passin3.1, g zones.	
Response Report #3A (BMC, 2018a)	The Robert Campbell Highway is prone to washouts during high rainfall events and ice “glaciers” during the spring melt. The glaciers will occur during the highway weight restriction period and during this period there will be less site specific traffic and thus less potential risk for vehicles passing at specific icy locations. Potential washouts can be identified by company traffic prior to actual road closure. If this information is forwarded to Yukon Highways, then there is the possibility that the potential problem may be resolved prior to the washout causing a highway closure. High rainfall events will be monitored and if there is a chance of road closures then company traffic will be restricted from highway use. In the event of a highway closure, due to washouts or other causes, BMC will provide any assistance required and will advise all company users of the closure and prevent all Project related traffic from entering the affected stretch.	Section 3.2.1 of Traffic Management Plan
Response Report #4B (BMC, 2019)	Additional mitigations include: - o BMC will keep records of all traffic entering and exiting the mine and will request that the Transportation and Engineering Branch resume the traffic counts at km 110 of the Robert Campbell Highway such that the daily and annual traffic on the Highway can be presented along side with the safety stats for comparison purposes. These reports will be publicly available through the Yukon Government’s Department of Energy Mines and Resources website and will be presented at community meetings in Ross River and Watson Lake and meetings with LFN and RRDC; - o BMC will work with Yukon Government’s Department of Highways and Public Works.to increase the frequency of brushing from km 114 to 232; - o BMC will also work with Yukon Government’s Department of Highways and Public Works.to identify areas where additional spot improvements could enhance usability and visibility from km 114 to 232; - o BMC will also work with Yukon Government’s Department of Highways and Public Works to identify locations for pullout construction between km 190 to 232; and	Section 3.1, 3.2 and Chapter 4 of Traffic Management Plan

Reference No.	Proponent Commitment / Mitigation	Where addressed
	o BMC will propose the creation of a road user interest group that can act as a focal point for the raising of any ongoing issues or suggestions for improvement of the road or BMC's use of the road. This group would be made up of representatives of RRDC, LFN, Town of Watson lake, RCMP and Yukon Government's Department of Highways and Public Works.	
Project Proposal Chapter 15 (BMC, 2017a)	Access and use of the Tote Road has been strictly controlled since the 1990s and there will be ongoing access control to the mine site, as per the requirements of the Tote Road Licence. Use of the Access Road during Project operations to access recreational areas for ATV and snowmobile use will be strictly prohibited. Implementation of the Traffic and Access Management Plan (see Section 18.12 of the Project Proposal) will mitigate the adverse effect of increased traffic on area wildlife.	Sections 3.1.1 and 3.1.10 of Traffic Management Plan
Decision Document (Portion of Condition #10)	The FCHOC will be engaged during the life of the KZK Project to annually review monitoring and the effectiveness of the Project's mitigation measures. The FCHOC will consider, at a minimum, the following mitigation and management strategies and their implementation as necessary: On a seasonal or shorter duration basis: II. The implementation of daily timing windows for temporary suspensions of truck transportation. III. The limiting of speeds on the access road. VII. The use of convoys for transportation. VIII. The intervals between and location of breaks in snow berms on the access road.	Section 4.1 of the Traffic Management Plan
Decision Document (Portion of Condition #10d)	The FCHOC shall submit recommendations related to addressing potential impacts on the FCH from the Project to YG regulators. YG shall give full and fair consideration to recommendations from the FCHOC, and to the extent of its authority under applicable legislation, YG shall incorporate the recommendations into project authorization requirements.	Section 1.2.3 of the Traffic Management Plan
Decision Document Condition #42	As part of the Finlayson Caribou Herd Oversight Committee's (FCHOC) review of mitigation and management strategies, the FCHOC will review and may make recommendations on whether activities on the mine access road, other than for ingress and egress of employees and for site safety, will be suspended for one month in the spring and one month in the fall each year to allow for seasonal migration of the FCH.	Section 1.2.3 of the Traffic Management Plan
Decision Document Condition #49	The Proponent shall incorporate into the Operational Plan and shall implement measures and procedures which accommodate the use of the road by persons holding valid authorizations under the Resource Roads Regulation for the purpose of exercising existing or asserted Aboriginal or treaty rights. The Permittee shall not impose restrictions or requirements that would materially impede access by access authorization holders, except where necessary to address reasonable concerns respecting safety, environmental protection, or the operational integrity of the road.	Sections 1.2.3 and 3.1.1 of the Traffic Management Plan