



KUDZ ZE KAYAH PROJECT

WILDLIFE PROTECTION PLAN

REV 03

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 of Revision
August 25, 2020	Rev 00	For Issue to Agencies
July 19, 2022	Rev 01	Updated to include: Terms and Conditions from Decision Document; and final edits from BMC review
March 13, 2024	Rev 02	Updated with response to Phase5b IR from EMR dated June 16, 2023, and reviewed by BMC's new team of biologists (EDI Environmental Dynamics Inc.)
June 1, 2026	Rev 03	Administrative updates in response to EMR completeness check

SUMMARY OF REVISIONS

Information Request/Intervention	Document	Section	Revision
Revision 02			
EMR Phase 5b IR Reformat table to delineate the wildlife groupings more accurately for birds – either include all birds under one header or separate into guilds –passerines/songbirds, waterfowl, raptors, etc.	Wildlife Protection Plan (WPP)	Section 2.2 Table 2-1 Table 2-2	Table 2-1 was split into two separate tables, one for mammals and amphibians (Table 2-1) and another for birds (Table 2-2). Species lists were updated and columns for general status rankings and likelihood of occurrence in the Project area were added. The bird species list was compiled based on the bird species known to breed within nesting zone B8 (Environment and Climate Change Canada 2023) to which additional species were added based on the experience of a QEP with species diversity in central Yukon and eBird data. The bird table was organized into bird species guilds.
EMR Phase 5b IR Ensure there is consistency in the information provided throughout the document.	WPP	Throughout document	BMC reviewed the WPP and addressed inconsistencies that were detected throughout the WPP. Survey and monitoring protocols were removed from the main body of the WPP and added as appendices to eliminate inconsistencies between sections. To the extent possible or logical, redundancy and repetition of mitigations between sections was reduced to reduce the risk of inconsistencies.
EMR Phase 5b IR Reformat the table to include an additional column detailing the SARA listing status for all species at risk that may occur within the project area. Lesser Yellowlegs, a COSEWIC assessed species, also has a range that overlaps with the Project area but does not appear to be on this table and should be added. ECCC has included a version of this in the appendix to this document that may be adapted by the Proponent for the purposes of their Wildlife Protection Plan. It is the Proponent's responsibility to ensure that this information is kept updated.	WPP	Section 2.3 Table 2-3	The SARA and COSEWIC species status in the table and throughout the WPP were updated to reflect the most current species at risk listings and designations. The table was updated to correspond to the format recommended by ECCC-CWS including the addition of COSEWIC and SARA designation columns with the year of the most recent assessment for each species.
EMR Phase 5b IR The primary mitigation should be Avoidance. Activities that may disturb nesting species, including clearing, should be avoided during the nesting season.	WPP	Section 3.3.1 Section 6.3 Appendix B	Clarified the language of the WPP to confirm that the primary protection mechanism to avoid incidental take and sensory disturbance of migratory birds is avoidance of clearing activities during the nesting season.

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			When land and vegetation clearing activities cannot avoid the breeding bird season, a QEP or an experienced observer under the supervision of a QEP will conduct pre-disturbance breeding bird surveys. The protocol for pre-disturbance breeding bird surveys was fully reviewed and updated (Appendix B) as were the mitigations in the WPP.
EMR Phase 5b IR In regards to the first bullet, remove 'or delegate under their supervision'.	WPP	Section 6.3 Appendix B	The protocol for pre-disturbance breeding bird surveys and the WPP were revised to state that surveys will be conducted by a QEP or an experienced observer under the supervision of a QEP.
EMR Phase 5b IR In regards to the fourth bullet, clearing should be postponed where nests are found and around the area where nesting behavior has been observed (i.e., active nesting areas).	WPP	Section 6.3 Appendix B	Clarified the language in the mitigations to confirm that no disturbance buffers will be applied and clearing activities will be postponed both where an active nest is confirmed and where a probable nesting site is identified. Clarified the language in the protocol for pre-disturbance breeding bird surveys to confirm that observers will focus search efforts to detect breeding bird behaviours indicative of the presence of a nest and to estimate the centre of breeding activities.
EMR Phase 5b IR Ensure there is consistency throughout the document on how mitigations are to be applied. Protocols detailed here differ from those detailed in section 3.4.3. In addition, requirements provided in other sections on mitigation approaches, nesting windows, buffers, actions to be taken where nesting behavior is observed but no nests are found, incident reporting, etc. should be included in Appendix B as well.	WPP	Section 6.3 Appendix B	The protocol for pre-disturbance breeding bird surveys was fully reviewed and updated. To avoid inconsistencies, the WPP and survey protocol were revised so that survey methods are found only in the protocol and mitigations only within the body of the WPP.
EMR Phase 5b IR The 20m nominal buffer should be removed to avoid confusion. As a baseline, those buffers included in Appendix B may be appropriate, however these would also need to be adjusted based on the location, species, and the disturbance levels present within the area. ECCC recommends that the Proponent include details on how these buffer distances would be established and ensure that they align with the guidance provided by ECCC on the Guidelines to Avoid Harm to Migratory Birds website. These details should also distinguish any variances on how these buffers would be	WPP	Section 6.3 Table 6-1	The protocols for the application of no-disturbance buffers around active bird nests and probable nesting sites were clarified in the WPP and additional details were provided. Section 6.3 was revised to eliminate inconsistencies in no-disturbance buffer sizes. To avoid inconsistencies, the WPP and survey protocol were revised so that survey methods are found only in the protocol (Appendix B) and mitigations only within the body of the WPP. A table with minimum recommended no-disturbance buffers for bird species groupings was created based on the advice from a QEP with expertise in pre-disturbance breeding bird surveys and effective buffer distances as well as available guidelines including the Yukon Forest Resources Act: Wildlife Features Standard (Yukon Energy Mines and Resources 2014), Habitat Protection Guidelines for Yukon Raptors, Ver. 2011 (EDI Environmental Dynamics Inc. 2011), Guidelines for Raptor Conservation during Urban and

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established around identified nests and areas where nesting behavior has been observed but no nests have been physically identified.			Rural Land Development in British Columbia (BC Ministry of Forests, Lands and Natural Resource Operations 2013), and Guidelines to avoid harm to migratory birds (Government of Canada 2023). The WPP was revised to indicate that the effectiveness of minimum no-disturbance buffers will be verified in the field and that these will be adjusted on a case-by case basis where their effectiveness appears suboptimal.
EMR Phase 5b IR Migratory periods should be added to the Sensitive Species and Periods table along with appropriate mitigations and activities to avoid.	WPP	Table 3-1 Section 6.3	Migratory periods were added to the table. Additional avoidance strategies and mitigations were added to Section 6.3 to address sensory disturbance to migrating birds.
EMR Phase 5b IR The Proponent broaden the approximate dates for Breeding Birds to indicate Early May to late August, with a note highlighting the potential for annual variance of these dates as noted above.	WPP	Section 3.3.1 Table 3-1 Section 6.3 Appendix B	The bird nesting window identified in the WPP was revised to the nesting window identified by ECCC for bird nesting zone B8 of the Bird Conservation Region 4 – Northwestern Interior Forest (https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods.html). The breeding bird season for Zone B8 is as follows: - Wetland ecosystems: 10 May to 10 August; - Open ecosystems: 5 May to 21 August; and, - Forest ecosystems: 5 May 13 August
EMR Phase 5b IR It is advised that alternative mitigation measures be explored. For water management ponds other deterrents may be available such as bird balls that do not pose a risk to the individuals.	WPP	Section 6.3 Table 6-2	The WPP was revised to remove bird netting as a mitigation measure for water management ponds. Alternative non-intrusive deterrent options for large birds (Sandhill Crane and Trumpeter Swan) were added to the WPP and include motion sensor water sprinklers, acoustic deterrents, and bird balls.
EMR Phase 5b IR This section should also include cavity nesting species (e.g., Chickadees and Woodpecker).	WPP	Section 6.3 Table 6-2	The WPP was revised to include considerations for cavity nesting birds.
EMR Phase 5b IR This section should also include cavity nesting ducks (e.g., Barrow's Goldeneye) and the habitat should also include some forested upland habitat and not just wetlands adjacent to ponds.	WPP	Section 6.3 Table 6-2	The WPP was revised to include considerations for cavity nesting waterfowl and to expand ecosystems used for nesting by wetland associated species.

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EMR Phase 5b IR Addition of section on Wildlife Incidences and Reporting. This section should contain a table indicating who would be contacted, for which species, and under what circumstances. Contact information for all parties should be included here and kept up to date. ECCC has management responsibilities for migratory birds under the Migratory Birds Convention Act (MBCA). ECCC recommends the Proponent notify ECCC's Canadian Wildlife Service (cwsnorth-scfnd@ec.gc.ca) for instances involving: - Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species; - Wildlife monitoring reports and annual reports that pertain to these species; and - Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species Where incidences involving migratory birds occur the Proponent should ensure information as detailed in their Wildlife Information Report is collected along with pictures of the bird or carcass where found and the nearby location. Prior to disposing of the carcass, the Proponent should contact ECCC and any other relevant agency (such as the YG Animal Health Unit) in case further testing is requested.	WPP	Section 7.2 Section 7.2.1 Table 7-3 Appendix C	A reporting section and contact list table were added to the Monitoring Section. These include a description of the reporting procedures for wildlife incidents and a reference to Appendix C (Wildlife Incident Report Form).
EMR Phase 5b IR Include a waterfowl monitoring program around bodies of water within and around the project site. should be implemented for waterfowl species to better inform mitigation approaches and adaptive management.	WPP	Section 7.1 Table 7-1 Chapter 8 Table 8-1	A waterfowl monitoring program for waterbodies near Project infrastructure (i.e., water management ponds, fish habitat ponds) and a sample of control ponds within and adjacent to the Project site was added to the monitoring and adaptive management sections.
EMR Phase 5b IR Further clarity on what is meant by "where practicable" or "to the extent possible" must be defined for each use.	WPP	Section 1.5.4 Throughout document	Added Section 1.5.4 (Mine Development Context). To the extent possible, terms like "where practicable" and "to the extent possible" were removed from the WPP to demonstrate BMC's commitment to the mitigations presented in the WPP and to provide additional specificity and enforceability. For mitigations that may not always be practicable or feasible, alternative mitigative approaches were added throughout the WPP and include, but is not limited to, the

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			development of site-specific management plans (Sections 3.3.3, 4.2, 4.6, 6.2, 6.3, 6.4, 6.5, 6.7, 7.1, and Chapter 8).
EMR Phase 5b IR Update plan with current data collection, beyond 2018.	WPP	Section 3.3.2 Section 6.1 Throughout document	Updated WPP to include aerial ungulate surveys completed from 2018 to 2023 (BMC Minerals Ltd. 2023a).
EMR Phase 5b IR BMC should adopt the highest standard of mitigations to avoid and/or minimize effects to caribou.	WPP	Section 1.4 Section 1.5.3.4 Section 3.3.2 Section 6.1	EDI conducted a thorough review of Rev01. BMC encourages EMR and ENV to review Rev02 in its entirety as additional details and mitigations were added and the WPP was somewhat re-organized for improved flow. Given the extensive nature of the changes, these have not been fully tracked in this revision table. To the best of our knowledge, Rev02 of this WPP has the highest standard of mitigations, monitoring, and adaptive management strategies that has ever been proposed for a project in the Yukon.
EMR Phase 5b IR Sections that reference “statistically significant” changes should be built out in further detail to describe change by means that is observable and detectable so that actions can be meaningfully taken.	WPP	Chapter 7 Chapter 8	BMC reviewed the proposed monitoring programs in detail and acknowledges that the sampling design of most of the monitoring components does not allow for statistical tests of significance. Terms such as “statistical” and “significant” were removed where appropriate. BMC will ensure that sampling design and intensity are sufficient to study trends in the variables being measured.
EMR Phase 5b IR BMC should use the Black River Project wildlife mitigation and monitoring program plan as a resources to further develop their WPP.	WPP	Throughout document Chapter 7	BMC reviewed the Back River Project Wildlife Mitigation and Monitoring Program Plan - Version 10 (Sabina Gold and Silver Corp. 2019) and changes were made throughout the WPP and additional details on monitoring commitments were added for all programs in Chapter 7.
EMR Phase 5b IR Cross reference existing wildlife monitoring requirements under the KZK tote road surface lease agreement (Schedule 2), confirm existing scale, scope, and reporting requirements of those existing license requirements, and elaborate in the next version of the WPP on those lease survey requirements and any gaps in coverage that the WPP will address.	WPP	Throughout document Appendix F	Lease Agreement 105G07-001, including Schedule 2, was reviewed and all mitigation, monitoring, and reporting elements that were not already captured in the WPP were included in Rev02. A concordance table was prepared and is presented in Appendix F of the WPP. MLUA LQ00424b was also reviewed and all mitigation, monitoring, and reporting elements that were not already captured in the WPP were included in Rev02. A concordance table was prepared and is presented in Appendix F of the WPP.
EMR Phase 5b IR Second bullet under “High risk time and areas” should be corrected.	WPP	Section 5.2.2 Section 6.1.2	The range of dates for the Little Rancheria Herd was corrected to October 15 to May 15 based on “Large mammal-vehicle collisions: overview of mitigations and analysis of collisions in Yukon” (EDI Environmental Dynamics Inc. 2015).

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EMR Phase 5b IR Second-last bullet should be corrected as the Conservation Officer district is Ross River (867-969-2202).	WPP	Section 5.4 Section 7.2.1 Table 7-3	The Conservation Officer Services district information and phone number were changed to those of the Ross River office.
EMR Phase 5b IR Reasons for selection column states: "Calving and rut habitat, and migration corridors are a conservation concern for Environment Yukon." Suggest re-wording to "All seasonal habitat and movement areas are a conservation concern for Environment Yukon."	WPP	Section 6.1.1	The sentence "All seasonal habitat and movement areas are a conservation concern for Environment Yukon" was added to Section 6.1.1 to acknowledge Environment Yukon's broader conservation concerns.
EMR Phase 5b IR Suggest updating hierarchy to reflect the typical standard of "Avoid, Minimize, Restore, Offset".	WPP	Section 3.1 Throughout document	The hierarchy in Section 3.1 was updated to include avoidance as the priority mitigation. The hierarchy was updated to the following: • Avoidance of activities that have the potential for adverse effects; • Eliminate adverse effects through planning and engineering designs and controls; • Application of mitigations during Construction, Operations, and Closure; and • Restoration of impacted wildlife habitat back to baseline levels. BMC reviewed the WPP and avoidance was prioritized in the suite of mitigations throughout the WPP.
EMR Phase 5b IR Suggest updating for caribou to include calving, post-calving, rut, and winter (all seasonal ranges that overlap with the project). There may be different levels of sensitivity/risk associated with each season; however, if caribou are interacting with the project in any season, there should be appropriate mitigation measures. Existing timing window for calving is not accurate (ENV uses May 15 to June 15). 'Mitigations or Activities to Avoid' column for caribou is insufficient and uses lenient language. Mitigations should be more prescriptive and also include scheduling around identified timing windows and suspension of activities if caribou are observed near project infrastructure/activities, e.g., "Schedule project activities that have the potential to cause sensory disturbance to occur outside of the identified timing windows for caribou (e.g., post-calving and rut)" and "Implement a project-specific program (i.e., height-of-land surveys) to monitor caribou sightings within 1 km	WPP	Section 3.3.1 Table 3-1 Section 6.1.1 Throughout document	Table 3-1 was updated to include late winter, calving, post calving, and rut. Caribou seasonal date ranges received from Kyle Russell, Acting Caribou Program Biologist, in an email dated August 6, 2018, indicated that the range of dates used by ENV for spring calving were May 15 to June 21. These dates are used throughout the plan. Additional mitigations for caribou (and other wildlife) are provided throughout the plan. The mitigations in Table 3-1 were intended to be a brief summary. For clarity and to avoid duplication, the mitigations column was deleted, and all mitigations are now included in the species-specific mitigations sections of the WPP.

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of project activities (that may cause direct or indirect disturbance) during construction, operations, closure. It is recognized that the ability to detect caribou within 1 km of project activities may be limited when operating within densely forested habitat. If caribou are observed within 1 km prior to starting up activities that could lead to sensory disturbance or startling of caribou, delay starting activities until the caribou have moved at least 1 km away from the site of project activities. If caribou approach active project activities within 1 km, monitor and document their behaviour, while allowing them to move through the area”.			
EMR Phase 5b IR Update with more current information. Potential crossing areas along road identified, but no habitat identified. Include caribou winter range (in proximity to road).	WPP	Figure 5-1	Figure was updated with the wildlife trails mapped as part of the additional caribou baseline studies.
EMR Phase 5b IR Inconsistent characterization of seasonal interactions, timing, and mitigations.	WPP	Throughout document	BMC reviewed the WPP and addressed all inconsistencies that were detected throughout the WPP. To the extent possible or logical, redundancy and repetition of mitigations between sections was reduced to reduce the risk of inconsistencies.
EMR Phase 5b IR More detail is needed for mitigation measures; some assumptions of mitigations is incorrect. Examples include: - When and how will it be decided to use convoys or leave longer periods without traffic? What is the trigger? - There is no evidence that caribou habituate to noise and vibration from blasting (or disturbance in general). To protect wildlife from the potential direct and indirect consequences of detonating explosives, whether within or outside of sensitive wildlife times and areas, blasting shouldn’t occur when wildlife are observed within 500 m of a blast site. - Rutting areas MUST be avoided during the rut period, not “where practicable”. - What are the protocols for caribou on the road?	WPP	Throughout the plan including: Section 4.2 Section 4.3 Section 4.6 Section 5.2 Section 5.3 Figure 5-2 Section 6.1	Additional mitigations and clarifications for site clearing and granular resource extraction, including blasting, are presented in Sections 4.3, 4.6, and 5.3. Additional controls, mitigations, and clarifications for traffic and access management, including air transport, snowbank management, and wildlife right-of-way are provided in Sections 4.2 and 5.2. The Wildlife and Road Operation Decision Matrix is presented in Figure 5-2. Additional mitigations and clarifications specific to caribou are presented in Section 6.1.

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- What is the design criteria for snow banks and berms (e.g., spacing, height, location)- Will flight tracks and altitude be recorded and evaluated to monitor adherence to mitigation measures? - Trucks are not going east to avoid caribou winter areas (east is the direction of materials transport).			
EMR Phase 5b IR It's not clear how this map shows 'wildlife key areas for flights' and what the associated observations represent?	WPP	Figure 3-1 Section 5.2.3 Section 6.1 Section 6.6	Figure 3-1 displays the key areas identified by the Yukon Government's Wildlife Key Area (WKA) Inventory Program. Additional mitigations and clarifications on the management of aircrafts relative to important seasonal wildlife habitats, including those for caribou and sheep, are provided in Sections 5.2.3, 6.1, and 6.6.
EMR Phase 5b IR Flight paths to and from the Finlayson airstrip will be adaptively managed over the entire year to minimize disturbance to caribou and flight paths will avoid flying directly over WKAs or other important wildlife habitat as it is identified.	WPP	Section 3.3.2 Section 5.2.3 Section 5.2.3.1 Section 5.2.3.2 Section 6.1	Text has been updated. Flights to the Finlayson airstrip will be adaptively managed throughout the year. Flight procedures for fixed-wing and helicopter operations are covered separately under Sections 5.2.3.1 and 5.2.3.2, respectively. Additional mitigations and clarifications on the management of aircrafts relative to important seasonal wildlife habitats, including those for caribou, are provided in Sections 5.2.3 and 6.1.
EMR Phase 5b IR More detailed monitoring methodology required to evaluate effectiveness of mitigations and overall monitoring program. How is 'change in distribution' being defined? Health monitoring parameters and methodology not logical.	WPP	Chapter 7	BMC provided additional details on monitoring commitments and methodology for all programs in Chapter 7 of Rev02. Baseline studies for the Project are ongoing and include several studies initiated by BMC to fulfill its obligations under Term 11b of the Project's Decision Document. While the data analyses of some desktop studies are ongoing, the results from most field studies will be available for analysis by early summer 2024. Once the scope of the additional studies is complete, their results will be used to improve the development of mitigations measures presented in this WPP as required.
EMR Phase 5b IR Provide additional details on contractor training and additional mitigation measures to prevent vehicle collisions with Caribou.	WPP	Section 3.2 Section 4.2 Section 5.2.1 Section 5.2.2 Section 6.1.2	Section 3.2 (Training & Education) commits BMC to provide all vehicle operators with an orientation of the WPP include those mitigations in Sections 5.2.1 and 5.2.2 related to Traffic and Access Management on the Access Road and for highway transport, respectively. Additional design and control measures for the Access Road are presented in Section 4.2.

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			Section 6.1.2 commits to providing transport contractors an orientation on the location of high-risk collision areas and mitigations to minimize the risk of collisions.
EMR Phase 5b IR The WPP should include a specific set back distance for Recommendation to protect bears from abandoning their dens and provide certainty that the mitigation is being followed. The setback should be developed and justified based on literature and best practices.	WPP	Table 3-1 Section 6.2 Appendix D	The WPP was updated with specific set back distances for active bear dens.
EMR Phase 5b IR The bear denning period should be extended to May 15	WPP	Table 3-1	The range of dates for the bear denning period was changed to "October 15 to May 15".
EMR Phase 5b IR Provide additional detail on the bear denning survey methodology, frequency and relation to avoidance setbacks.	WPP	Appendix D Section 6.2 Table 8-1	A bear denning pre-disturbance protocol has been added to the WPP (Appendix D). Section 6.2 (Grizzly bear and Black Bear) has been updated to include additional life history information, mitigations (including set-back distances), monitoring details, requirement for site-specific management plan if bear dens are identified. Table 8-1 has been updated to include additional monitoring and adaptive management triggers.
EMR Phase 5b IR The camp shall be enclosed with a maintained and functional electric fencing to avoid the loss of wildlife to human-bear conflict.	WPP	Section 4.4	Text was updated to include fencing around the camp.
EMR Phase 5b IR Use moose late-winter survey methodology developed by ENV or provide details describing the methodology and statistical approach to use used to detect changes to habitat use.	WPP	Section 7.1.1 Appendix E	Text was updated to include the methods developed by ENV and Appendix E (Moose Effects Monitoring Program Protocol) has also been added.
EMR Phase 5b IR The WPP shall include a component to map and track surface disturbance and linear features on an annual basis. BMC shall discuss with YG the best approach / attributes to capture this information in a way that it can be entered into the YG surface disturbance database.	WPP	Section 4.3	Section 4.3 was amended to include reporting of land clearing on an annual basis, which is a requirement of all QMLs. The area and location of new land clearing is required to be submitted to EMR annually as part of end of season annual reporting on MLUA LQ00424b and will also apply to the QML once received.

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EMR Phase 5b IR Provide details on how new sensitive microsites will be identified and considered in the WPP.	WPP	Section 3.3.3 Section 6.2 Section 6.3.1	A more detailed section focusing on habitat features (microsites) including relevant mitigations was added to the WPP (Section 3.3.3). WPP was updated to include pre-disturbance grizzly bear dens surveys ahead of winter and early spring activities (Section 6.2) and pre-activity surveys at known raptor nests (Section 6.3.1).
EMR Phase 5b IR The proponent shall not conduct activities within 1 km of active nest sites until after August 15th if nesting eagles or falcons are observed. The proponent shall, when safe to do so, avoid flying over raptor nesting sites, and avoid approaching cliff nests from behind.	WPP	Section 3.3.1 Table 3-1 Section 6.3 Section 6.3.1	The range of dates for the cliff-nesting raptor season in Table 3-1 was changed to April 1 to August 15. Additional mitigations were added to added to Section 6.3 and 6.3.1.
EMR Phase 5b IR Equipment laydown areas should be greater than 100m from wildlife cross locations.	WPP	Section 4.2	Section 4.2 has been updated to reflect the requested 100 m.
Email from YG Lands Department The document would benefit from a couple clarifications around what mitigations apply to borrow pit development and on going use. I think the relevant mitigations covered in the plan based on overlap of activities with the access road construction, but for clarity and ease of readability, either a section for borrow pit development and use or additional references to the pits where relevant throughout the document would be great.	WPP	Section 4.6	Section 4.6 (Granular Resources) was added to address this request.
EMR Phase 5b IR Provide concordance table as required by the Plan requirement guidance for quartz mining projects.	WPP	Table of Concordance	This table has been added to the WPP.
EMR Phase 5b IR Provide “No recreational use of ATVs and Snowmobiles” policy.	WPP	Section 1.3 Appendix A	The list of policies listed in Section 1.3 was updated to reflect all the policies relevant to the WPP. All wildlife policies are included in Appendix A (including the No Recreational use of All-Terrain Vehicles and Snowmobiles Policy).

LIST OF ACRONYMS AND ABBREVIATIONS

AGL	Above Ground Level
ASL	Above Sea Level
BCR4	Bird Conservation Region 4
BMC	BMC Minerals Ltd.
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
ECCC	Environment and Climate Change Canada
EDI	EDI Environmental Dynamics Inc.
ENV	Department of Environment
FCH	Finlayson caribou herd
FCHOC	KZK-FCH Oversight Committee
GMS	Game Management Subzone
Kaska	Kaska First Nations
KZK	Kudz Ze Kayah
LSA	Local Study Area
The Project	The Kudz Ze Kayah Project
QEP	Qualified Environmental Professional
RCH	Robert Campbell Highway
RRDC	Ross River Dena Council
RSA	Regional Study Area
SARA	Species at Risk Act
WPP	Wildlife Protection Plan
YCDC	Yukon Conservation Data Centre
YESAB	Yukon Environmental Socio-economic Assessment Board
YG	Yukon Government

GLOSSARY

Access Road: The upgraded Tote Road between the Robert Campbell Highway and the Camp.

Closure Phase: Project phase that will occur following Operations Phase once all mining and ore processing activities stop.

Conservation Officer: A public safety provider, under employment of Yukon Government, focused on natural resource law enforcement and human wildlife conflicts prevention and response.

Construction Phase: Project phase that will last approximately 2 years and includes Project site preparation and clearing and establishment of Project infrastructure.

Endangered species: Means a wildlife species that is facing imminent extirpation or extinction.

Experienced Observer: Related to pre-disturbance breeding bird surveys. An “experienced observer” is defined as an individual experienced in conducting breeding bird surveys by sight and sound and with extensive knowledge of the breeding bird assemblages present in the relevant ecosystems.

Incidental Take: Generally refers to migratory birds, nests, and eggs but applies to all wildlife species. Refers to inadvertently harming, killing, and disturbing wildlife when the main activity being conducted does not specifically target wildlife (i.e., as opposed to hunting where wildlife is targeted for harvest).

Initial Environmental Evaluation: A body of work completed at Kudz Ze Kayah in the 1990’s by Cominco, which included wildlife baseline surveys.

Interested Parties: Yukon Government, affected First Nations, and other resource users in the area, including, but not limited to representatives of outfitters and trappers groups.

Local Study Area: The LSA is the area encompassing a 3 km radius buffer surrounding the proposed Project infrastructure footprint, and a 1.5 km radius buffer of the Tote Road. This is the area where most indirect Project effects will occur and is Valued Component/subcomponent specific.

Northern Mountain Population: A distinct ecotype of woodland caribou that have unique habitat preferences and behaviour.

Operations Phase: Project phase that will last approximately 10 years and includes open pit ABM open pit and underground development, and ore processing.

Potential Effect: An effect identified through potential interaction between Project activity and Valued Component.

Probable Nesting Site: The exact location of a bird nest is often difficult to detect. Pre-disturbance breeding bird surveys focus their efforts on searching for and observing breeding bird behaviours such as courtship displays, agitated behaviour, alarm and contact calls, distraction displays, flushing and returning to the same area, carrying nest material, food, or fecal sacs, signs of breeding including eggshells and whitewash on trees or leaves. The centre of breeding activities and behaviours is used to confirm the presence of a nest and estimate its location.

Project Area: Refers to the area occupied by all the Project infrastructure where all direct effects from Project construction and operation will occur (also called the Direct Disturbance Area). Includes some areas of natural ecosystems between the locations of infrastructure footprints.

Project Footprint: Refers to the area in which the Project Infrastructure will be located and is the area of direct disturbance from the Project activities.

Qualified Environmental Professional: An applied scientist or technologist with the post-secondary education and experience qualifications in the environmental sciences necessary to complete an environmental task in their field of expertise; may be certified by a professional association.

Regional Study Area: The RSA was based on the boundaries of Environment Yukon's Game Management Subzone 10-07. This is the area where some indirect Project effects on wide ranging species may occur and is Valued Component/subcomponent specific.

Species of Special Concern: Means a wildlife species that may become a threatened or an endangered species because of a combination of biological characteristics and identified threats.

Subcomponents: Subcomponents are identified to facilitate and structure the assessment of broadly defined Valued Components (e.g., individual species or species groups for Wildlife Valued Component), as applicable.

Threatened Species: Means a wildlife species that is likely to become an endangered species if nothing is done to reverse the factors leading to its extirpation or extinction.

Tote Road: The existing 24 km road alignment between the Robert Campbell Highway and the ABM Deposit.

Valued Component: Element of the environmental and/or socio-economic systems valued for environmental, scientific, social, aesthetic, or cultural reasons.

Wildlife Key Area: Areas designated by Yukon Government as especially important for wildlife, specifically during certain seasonal life functions (e.g., rutting, lambing, breeding).

Zone of Influence: The spatial area of influence affecting an animal's behaviour as a result of development and operational activities.

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1 INTRODUCTION

1.1 PROJECT DESCRIPTION

BMC Minerals Ltd. (BMC) is the owner of the Kudz Ze Kayah (KZK) Project (the Project). Since acquiring the Project in 2015, BMC actively engaged in assessing historical work, optimizing design, resource drilling, economic assessment, baseline environmental studies, and First Nations and community engagement as well as the successful completion of the Executive Committee Screening by the Yukon Environmental and Social-Economic Assessment Board (YESAB).

The purpose of this Wildlife Protection Plan (WPP) is to outline BMC's commitments to employ management strategies that are practical and that will aim to minimize negative effects to wildlife and their habitat, and to present the wildlife monitoring and adaptive management programs. The adaptive management approach will be used to continually improve the management and mitigation measures to minimize disturbance to wildlife throughout the life of the Project.

Management and mitigation measures described in this WPP are designed to comply with BMC's policies, regulatory requirements, terms and conditions set out in the Decision Document (associated with the Project assessment process under the *Yukon Environmental and Socio-economic Assessment Act*), agreements between Kaska and BMC, and BMC's commitment to continual improvement.

This management plan encompasses the area of the forthcoming Quartz Mining Licence, the existing Tote Road Lease for the Project (105G07-001), the Class 3 Quartz Mining Land Use (MLU) Approval (LQ00424b) and all other Project related licences and leases that will be required for the Project (i.e., lands leases for the Access Road and associated borrow areas, the claim fraction overlying the Class C Storage Facility etc.).

1.1.1 Project Setting

BMC's Project Proposal to the YESAB assessed potential impacts of the Project on wildlife based on the Direct Disturbance Area, Local Study Area (LSA), and Regional Study Area (RSA) (BMC Minerals Ltd. 2017). The WPP refers to these areas in various context.

Although the Project infrastructure includes all existing and proposed development areas, the Project infrastructure in the context of this WPP generally refers to the mine development area (e.g., ABM pit, storage facilities, camp) to differentiate it from the Access Road.

The Direct Disturbance Area or Project Area is the area occupied by all the Project infrastructure where all direct effects from Project construction and operation will occur (Figure 1-1). The extent of the Project Area is 9.8 km²; however, it also includes some areas of natural ecosystems between the locations of infrastructure footprint. The extent of the Project infrastructure, once fully developed, will be 7.1 km² (1.3 km² for the Access Road and 5.8 km² for other infrastructure such as the ABM pit, storage facilities, and camp).

The LSA is the area encompassing a 3 km radius buffer surrounding the proposed Project infrastructure footprint, and a 1.5 km radius buffer of the Tote Road (Figure 1-1). The extent of the LSA is 124 km². The LSA includes the Geona Creek watershed area and roughly follows the height of land to the east and west, and south to the outflow of South Lakes. This is the area where most indirect Project effects will occur.

The RSA was based on the boundaries of Environment Yukon's Game Management Subzone (GMS) 10-07, which has a total area of 2,063 km² (Figure 1-1). Environment Yukon uses GMSs for big game population monitoring and harvest management. Therefore, the baseline data collected for the Project could complement and be comparable to other data collected by Environment Yukon while providing a minimum spatial radius buffer of 10 km in all directions from the Project for effects assessment. This is the area where some indirect Project effects on wide ranging species may occur.

1.2 OBJECTIVES

Considering the scope of the Project (i.e., mine development, operation, and closure), potential interactions with wildlife species include sensory disturbance, loss or degradation of habitat, changes to movement corridors, potential for increased mortality, and health risks. This WPP provides mitigation measures to minimize the potential effects of Project activities on wildlife and their habitats. Some of the mitigation measures outlined in this plan are general and applicable to all species and areas of the Project. Others are specific to a Project phase, species, area, or sensitive time. This plan will be reviewed and updated annually by BMC as it monitors the effectiveness of management and mitigation measures with the established triggers for wildlife outlined in Chapter 8 of this plan, or as new information becomes available.

Given the Project's scope and permitting requirements, the objectives of this WPP are to:

- Describe control and mitigation measures to avoid, eliminate, or minimize potential Project-related effects on wildlife and wildlife habitats;
- Describe how BMC integrated wildlife related commitments made by BMC through the Project assessment and other regulatory processes as well as Project conditions and operational guidelines from the Quartz Mining Licence and other regulatory approvals;
- Describe the integration of information and knowledge received from regulators, stakeholders, and First Nations during the assessment of the Project and through community and regulatory engagement; and,
- Outline the adaptive management practices that will be used to incorporate new information gained over time from community knowledge, monitoring and baselines studies, incidental wildlife observations and their responses to Project activities.

1.3 BMC WILDLIFE MANAGEMENT POLICIES AND STRATEGIES

This WPP is the primary document that BMC will use to implement wildlife and habitat protection measures. It is a "living document" that will be reviewed annually and be revised as necessary to ensure an appropriate level of wildlife protection is achieved. As more information is gathered through monitoring both the presence and behaviour of wildlife interactions with the Project and personnel, additional mitigation measures may be developed and integrated into the WPP. BMC's main policies related to wildlife protections include:

- *Environment Policy* (Appendix A);
- *No Firearms Policy* (Appendix A);
- *No Feeding of Animals Policy* (Appendix A);
- *No Recreational use of All-Terrain Vehicles and Snowmobiles Policy* (Appendix A); and
- *No Hunting – No Fishing Policy* (Appendix A).

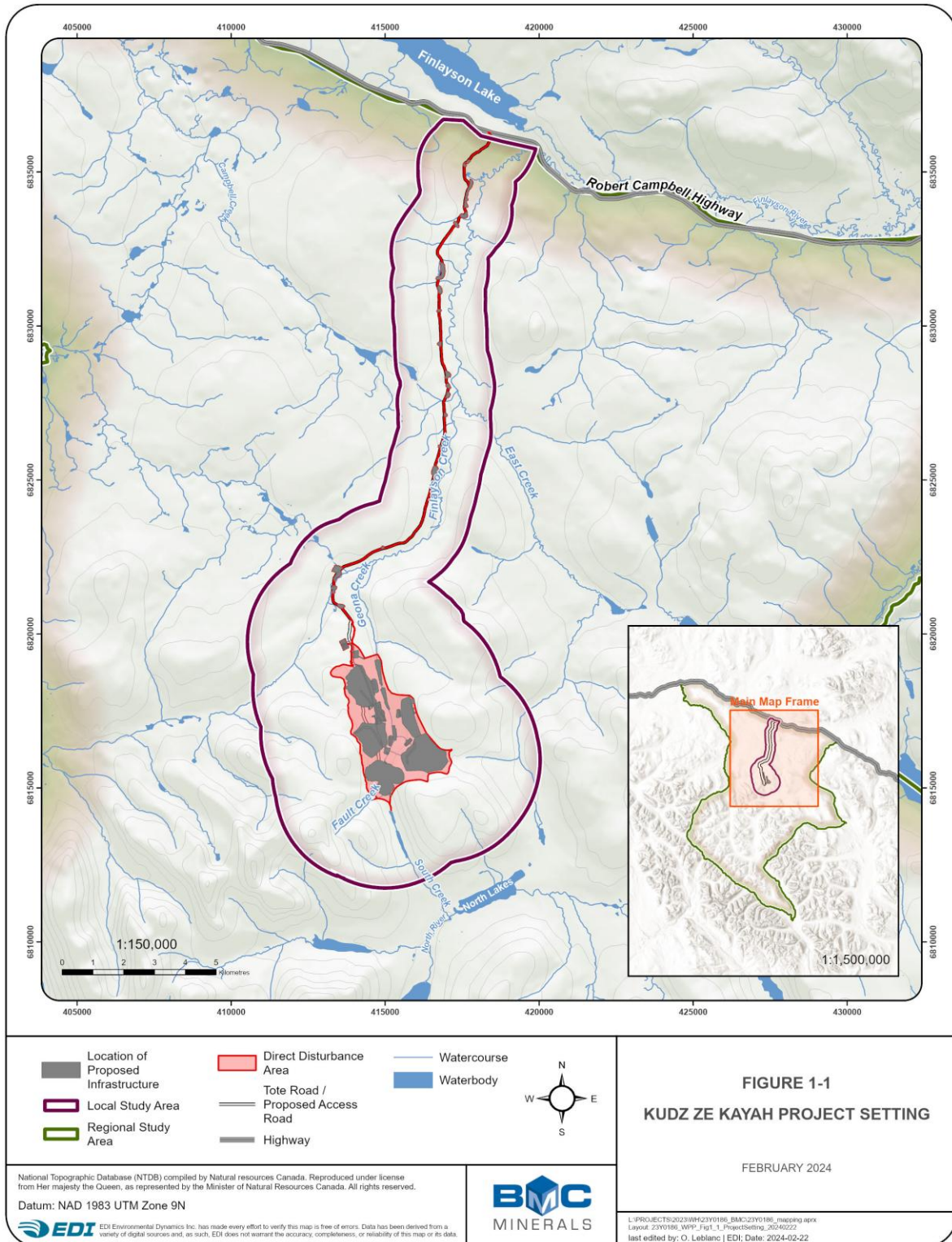


Figure 1-1: Kudz Ze Kayah Project Setting

1.4 REGULATORY CONTEXT

1.4.1 Acts and Regulations

The following federal and territorial acts and regulations were considered in the development of this WPP:

Federal statutes:

- *Canada Wildlife Act* (Environment and Climate Change Canada 2017)
- *Canadian Environmental Protection Act* (Government of Canada 1999)
- *Migratory Birds Convention Act* (Government of Canada 1994)
 - *Migratory Birds Regulations* (Government of Canada 2018)
- *Species at Risk Act* (Government of Canada 2002)
- *Yukon Act*
- *Yukon Environmental and Socio-economic Assessment Act*

Territorial statutes:

- *Environment Act* (Government of Yukon 2002a)
 - Numerous regulations under the *Environment Act*
- *Quartz Mining Act* (Government of Yukon 2003a)
 - *Quartz Mining Land Use Regulation* (Government of Yukon 2003b)
- *Wildlife Act* (Government of Yukon 2002b)
 - *Wildlife Regulation* (Government of Yukon 2012a)

1.4.2 Management Practices and Guidelines

The following management practices and guidelines were used in the development of this WPP:

- Best management practices for works affecting water in Yukon (Environment Yukon 2011);
- Flying in caribou country: how to minimize disturbance from aircraft (Government of Yukon 2010);
- Flying in sheep country: how to minimize disturbance from aircraft (Mining Environment Research Group 2006);
- Granular Resource Management Plan, 2nd Edition (Yukon Community and Transportation Services 1996);
- Habitat Protection Guidelines for Yukon Raptors, ver. 2011 (EDI Environmental Dynamics Inc. 2011);
- Guidelines for Industrial Activity in Bear Country for the Mineral Exploration, Placer Mining, and Oil & Gas Industries (Mining and Petroleum Environment Research Group 2008);
- Large mammal-vehicle collisions: overview of mitigations and analysis of collisions in Yukon (EDI Environmental Dynamics Inc. 2015);

- Proponent's Guide: Assessing and Mitigating the Risk of Human-Bear Encounters (Government of Yukon 2012b);
- Reducing Wildlife Conflicts with Electric Fencing: A Beginner's Guide (Government of Yukon 2018);
- Yukon Forest Resources Act: Wildlife Features Standard (Yukon Energy Mines and Resources 2014); and,
- Yukon Mineral and Coal Exploration Best Management Practices and Regulatory Guide (Yukon Chamber of Mines 2010).

1.4.3 Tote Road Lease Conditions and Operational Guidelines

Extensive wildlife protection conditions are included in the existing Tote Road Lease for the Project (105G07-001). All conditions related to Wildlife (including Schedule 2 of the Lease which contains the Wildlife Agreement) have been incorporated into the WPP. A table of concordance for each condition and the location where that condition is addressed in the WPP is included in Appendix F.

Prior to construction and operation of the Project the Tote Road will require upgrading to meet appropriate safety standards so that it is fit for purpose. BMC has therefore submitted an application to EMR Lands to amend the Tote Road Lease. The WPP and Appendix F will be revised as necessary upon receipt of the amended Tote Road Lease.

1.4.4 Class 3 Quartz Mining Land Use Approval

Extensive wildlife protection conditions are included in the existing Class 3 Quartz Mining Land Use (MLU) Approval for the Project (LQ00424b). All conditions related to Wildlife in the MLU have been incorporated into the WPP. A table of concordance for each condition and the location where that condition is addressed in the WPP is included in Appendix F.

Any amendments to the MLU and/or new MLUs that are obtained for the Project will be reviewed and the WPP and Appendix F will be revised as necessary.

1.4.5 Quartz Mining Licence Conditions and Operational Guidelines

This section will be completed and this WPP will be revised as necessary upon receipt of the Quartz Mining Licence.

1.5 PLAN REVIEW AND EXECUTION

1.5.1 BMC-Kaska

BMC engaged extensively with Ross River Dena Council (RRDC) including community meetings in Ross River, Elders Oversight Committee Meetings, meetings with Chief and Council, and engagement with RRDC's wholly owned environmental consultancy, Dena Cho Environmental and Remediation Inc. (Dena Cho). As part of this ongoing engagement, Dena Cho had the opportunity to conduct a detailed independent review of the draft plan and to provide feedback to BMC prior to this Plan being finalized.

BMC and Ross River Dena Council (in its role as lead community for the Kaska Nations, including Liard First Nation) are parties to an existing Socio-Economic Participation Agreement (SEPA) for the KZK Project. In 2019, BMC and RRDC (on behalf of all Kaska Nations) signed a Letter of Intent committing the parties to a

modernization process for the existing SEPA. In March 2021, BMC tabled a proposed modernized SEPA with all Kaska leadership. The proposed SEPA includes provision for establishment of a Kaska/BMC Environmental Management Advisory Committee. Under the current proposal before Kaska, this committee will be tasked with, among other things, reviewing and providing input into environmental management plans, receiving and reviewing reports on implementation of those plans, reviewing monitoring plans/results, reviewing incident reports, and reporting back to Kaska members.

1.5.2 Interested Parties

BMC will provide opportunities to meet at least once each year with Interested Parties to report on and review the wildlife protection and monitoring provisions contemplated in this WPP. A primary objective of the annual meetings will be to provide advance notice of anticipated Project activities and plans for the upcoming year and to avoid unnecessary conflicts with other resource users (Schedule 2, Clause 5.1 – Lease Agreement 105G07-001).

1.5.3 Decision Document Requirements

With the exception of Condition E, the Decision Document terms and conditions for wildlife are entirely related to the Finlayson Caribou Herd (FCH; Conditions #10, #11, #38, #41 and #42). Most of the conditions commit the Yukon Government (YG), LFN, and RRDC to collaboratively manage the FCH at a population and range wide level as well as at the Project level. BMC has made Project level commitments to Kaska for the monitoring and adaptive management of the herd through the proposed BMC-Kaska Environmental, Cultural & Heritage Management Program and Kaska/BMC Environmental Management Advisory Committee. Collectively, these collaborations will ensure that: communication between the parties remains open and transparent, the herd is effectively monitored, potential effects to the FCH are minimized, and the herd will be adaptively and effectively managed when required.

1.5.3.1 Condition E – Moose Monitoring

Monitoring Condition E of the Decision Document states:

"That a survey program be designed and instituted by the Proponent to monitor moose during late winter from construction through closure stages of the Project. This survey program shall be designed through collaboration with affected First Nations."

BMC developed a protocol for the Moose Effects Monitoring Survey Program based on materials and recommendations provided by Yukon Government's Department of Environment (ENV). This condition is addressed in Section 7.1.

1.5.3.2 Condition 10 – Finlayson Caribou Herd Oversight Committee

Condition #10 of the Decision Document states:

"Within six months of issuance of a Decision Document the Government of Yukon (YG) shall establish an independent KZKFCH Oversight Committee (FCHOC) comprised of participants representing the YG, Liard First Nation (LFN), and Ross River Dena Council (RRDC)."

Establishment of the FCHOC will include the development of a Terms of Reference that describes:

- *Establishment of roles, responsibilities, and participants. The role of the Proponent as a member of the FCHOC.*
- *Participant funding (RRDC and LFN).*
- *Process for review of information (western scientific and traditional knowledge).*
- *Process for decision-making and reporting.*
- *A mechanism for conflict resolution.*
- *Other matters as agreed to by the parties.*
- *Communication protocols between the FCHOC (chaired by YG), the Regulators, and the Proponent.*

BMC understands from Yukon Government that the FCHOC has been formed but that to date no Terms of Reference have been established. BMC is committed to participate in the FCHOC to the extent permitted (i.e., through development of communication protocols and definition of BMC's role in the Committee as per the above condition).

Condition #10 of the Decision Document also states:

"Review throughout the life of the Project:

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:

a. Annually:

- I. When and how to apply the Proponent's mitigation measures pertaining to caribou referred to in Appendix A (Proponent commitments).*
- II. The prioritization of methods for reducing sensory disturbance.*
- III. The establishment of objectives, methods and prioritization for effectiveness monitoring.*
- IV. The identification of triggers and corrective actions within the adaptive management plan.*
- V. The identification of additional mitigations such as offset measures that may be necessary to reduce adverse effects based traditional knowledge or new information from project specific or range-wide monitoring.*
- VI. Educational and outreach activities regarding caribou in relation to the Project".*

BMC notes that the above condition is consistent with the proposed BMC-Kaska Environmental, Cultural & Heritage Management Program for the Project.

Condition #10 of the Decision Document also states:

"b. On a seasonal or shorter duration basis:

- I. The implementation of timing windows for temporary suspensions of blasting and crushing.*
- II. The implementation of timing windows for temporary suspensions of truck transportation.*
- III. The limiting of speeds on the access road.*
- IV. Restrictions on flights based on timing windows.*
- V. Modification of flight paths.*
- VI. Suspension of helicopter use.*
- VII. The use of convoys for transportation.*

VIII. The intervals between and location of breaks in snow berms on the access road."

This WPP currently considers many control and mitigation measures similar to those listed above as outlined in Sections 4.2, 5.2.3, and 5.3 of this document. BMC will amend the WPP annually as required based on the FCHOC's annual review of the effectiveness of the Project's mitigation measures and monitoring strategies.

Condition #10 of the Decision Document also states:

"The FCHOC will review the initial Quartz Mine Licence (QML) application and any subsequent amendments to the Wildlife Protection Plan (inclusive of the Caribou Effects Monitoring and Mitigation Program), AMP and any other applicable plans. The FCHOC will be provided all available information to support their reviews, including the results of data collection and monitoring on the FCH.

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. Any other outputs of the FCHOC related to the status of the FCH across its range shall be provided to the appropriate YG officials.

Upon decision, the YG regulator(s) shall submit to the FCHOC an explanation of how the Committee's recommendations were taken into consideration."

This WPP presents the mitigations (Chapters 3, 4, 5, and 6), monitoring (Chapter 7), and adaptive management plan (Chapter 8) for the FCH and is consistent with what BMC proposed during the YESAA Screening process. BMC will make the results of its caribou studies available to the FCHOC for their review.

Once the FCHOC has reviewed this WPP, applicable monitoring data and other information as available, and the YG regulator deems the recommendations (if any) from the FCHOC to be appropriate (via authority under applicable legislation), this WPP will be amended as required.

1.5.3.3 Condition 11a – YG Finlayson Caribou Herd Desktop Report

Condition #11a states:

"The Government of Yukon (YG), in collaboration with affected First Nations, shall prepare a desktop review report of the FCH (FCH), based on all available western scientific and traditional knowledge. The results of the desktop review will inform the following:

- I. The need for and collection of additional data and project effects monitoring information, and identification of offset measures as required for unmitigated effects.*
- II. Range wide herd population dynamics, distribution, health, and habitat surveys.*
- III. Examination of cumulative effects and risks to the herd based on existing land use information.*

The results of the desktop review will be made available to the FCHOC. The FCHOC will review and provide recommended actions, as appropriate, such as offsetting measures, to the YG regulator(s) for any additional mitigations or monitoring".

BMC will make the results of caribou baseline studies available to YG as these may be useful in the preparation of the desktop review. If the YG regulator deems the resultant recommendations (if any) from the FCHOC to be appropriate, this WPP will be amended as required.

1.5.3.4 Condition 11b – Additional Baseline Studies

Condition #11b states:

“The Proponent shall undertake additional data collection (habitat, distribution and movement) for a period of 2 years prior to initiation of construction, to inform the development and approval of a Caribou Effects Monitoring and Mitigation Program (Term No. 38[1]), AMP and the WPP.

The design and methodology for this data collection will be developed in cooperation with Kaska and YG. The data collection shall commence once YG approves the Proponent’s study design and methodology, following the issuance of this Decision Document”

The additional baseline studies design and methodology was developed, in cooperation with Yukon Government and with inputs from Kaska (during YG’s consultation on the draft work plan). The Approved *Kudz Ze Kayah Project – Additional Caribou Baseline Studies Workplan* was undertaken between 2022 and 2025. The preliminary report was provide to YG, RRDC and LFN in December 2024 and the final report was provided in April 2026. The primary objective of the program was to fulfil regulatory requirements (Term 11b) by collecting and analyzing additional two years of comprehensive data on the Finlayson Caribou Herd to provide additional insight into habitat use, distribution, and movement.

The additional data will now be reviewed and where applicable this WPP will be updated (including the chapters related to Caribou Effects Monitoring, Mitigation and Adaptive Management).

1.5.3.5 Condition 11c – Finlayson Caribou Herd Population Monitoring

Condition #11c states:

“YG will undertake additional range wide data collection and monitoring based on the results of the desktop review. The results of this monitoring will be shared with the FCHOC.”

As per the FCH data sharing agreement between YG and BMC, it is expected that any range wide data collected by YG will also be shared with BMC as has been common practice between the parties for the last 12 years on all data collection. BMC would support the participation of its Project biologist(s) in these studies if requested to do so by YG.

1.5.3.6 Condition 11d – Finlayson Caribou Herd Management Plan

Condition #11d states:

“YG, in collaboration with affected First Nations, will develop a management plan for the FCH. The parties will determine management goals and objectives though a collaborative process.

The FCH management plan will consider the following topic areas upon further discussion with affected First Nations:

- a. *Management principles and goal*
- b. *Current conditions*
- c. *Limiting factors*
- d. *Future conditions*
- e. *Habitat restoration and rehabilitation measures, and other offsetting measures where required*
- f. *Management objectives and thresholds*
- g. *Management tools and actions*
- h. *Implementation*
- i. *Monitoring*
- j. *Adaptive management and review*
- k. *Communication"*

Once the FCH management plan is shared with BMC, it will be reviewed and this WPP will be updated (where appropriate).

1.5.3.7 Condition 38 – Caribou Effects Monitoring and Mitigation Program

Condition #38 states:

"The Proponent shall develop a Caribou Effects Monitoring and Mitigation Program, as part of the wildlife protection plan for review and approval under the quartz mining license (QML). The Proponent will provide the proposed program for review to the Finlayson Caribou Herd Oversight Committee (FCHOC). As described in Mitigation No. 10, the FCHOC will review and provide input on the effects monitoring program that will be incorporated into the approval of the program during the QML review.

The Caribou Effects Monitoring and Mitigation Program shall be designed in consideration of the following objectives:

1. *Evaluating effectiveness of the Proponent's caribou mitigations/Wildlife Protection Plan.*
2. *Evaluating effects of the Project on disturbance and displacement of the FCH.*
3. *Consideration of effects at various stages of the Project, including during pre- construction, construction, operations, and closure phase."*

This WPP includes control and mitigation (Chapters 3, 4, 5, and 6), monitoring (Chapter 7), and adaptive management (Chapter 8) considerations for wildlife, including the FCH. Once the FCHOC reviews this WPP and the YG regulator deems the recommendations (if any) from the FCHOC to be appropriate, this WPP will be amended as required.

1.5.3.8 Condition 41 – Offsetting Measures

Condition #41 states:

"The Proponent shall undertake the identification of offsetting measures and develop a plan, with the objective to address residual adverse effects to the Finlayson Caribou Herd and their habitat in consideration of the Management Plan for the Northern Mountain Population of Woodland Caribou (Rangifer tarandus caribou) in Canada. The Proponent shall develop the plan in consultation with Kaska, including a schedule for implementation."

BMC is committed to identifying offsetting measured and developing a plan and its schedule for implementation in consultation with Kaska. This WPP plan will be amended to include the Offsetting Plan, upon approval by YG.

1.5.3.9 Condition 42 – Access Mitigations

Condition #42 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.”

If the YG regulator deems the resultant recommendations (if any) from the FCHOC to be appropriate, this WPP will be amended as required.

1.5.4 Mine Development Context

This WPP is written in the context of a Project that has undergone an Environmental and Socio-economic Assessment by the YESAB’s Executive Committee. The Decision Bodies agreed with YESAB’s recommendation for the Project to proceed to permitting subject to the addition and modification of certain terms and conditions. While the Decision Bodies acknowledged the impacts of the Project on the landscape, wildlife, and their habitat, they also acknowledged that mitigations proposed by BMC, YESAB and themselves were appropriate and effective. To that effect, the Project is acknowledged to exist on the landscape with some form of disturbance that is direct and cannot be avoided (i.e., the Project infrastructure footprint) and indirect (i.e., a zone of influence on the adjacent landscape where some effects extend beyond the infrastructure footprint due to Project activities). To that end, the assessment acknowledged that there are residual effects, regardless of mitigations, and that those residual effects are within an acceptable level, as defined by YESAB. This WPP is designed to ensure that the impacts are managed within or below that acknowledged level of impact.

Recognizing that the location of some of the Project infrastructure is immovable and that some mitigations cannot be applied to that portion of its footprint, the mitigations presented in this plan will be adhered to except in certain circumstances where a proposed mitigation may (including but not limited to):

- Pose or increase potential health and safety risks for Project personnel;
- Pose or increase potential risk to equipment, infrastructure and/or the Project;
- Pose or increase the potential risk of disturbance, health, injury, or mortality to wildlife; or
- There are reasons a certain action is impracticable, not realistic or achievable, or is unlikely to achieve the desired effect.

Further, some avoidance strategies or mitigations may not always be operationally feasible given the scope of mine development and multiple competing priorities including other environmental protection considerations (e.g., bird nesting season, ungulate no-disturbance timing windows, work activities that cannot be completed during frozen ground conditions, spring freshet). This WPP clearly identifies those mitigations that may not always be possible, practicable, or feasible (due to the circumstances listed above or some other unique and unexpected circumstance). For these mitigations, alternative mitigative approaches are presented.

BMC notes that YG is aware that some mitigations are not always possible, practicable, or feasible and that where this is the case YG has included this terminology in BMC's current licences (Appendix F). The terminology of these licence conditions has not been altered throughout this WPP.

1.6 WILDLIFE PROTECTION PLAN EFFECTIVENESS

The tasks for implementing and monitoring the WPP effectiveness will (in part) be overseen by BMC's Environmental Department Manager and through quarterly and annual performance reviews conducted by the BMC/Kaska Environmental Management Advisory Committee. Their tasks include:

- Ensuring adherence to the WPP through internal auditing;
- Wildlife observation reports and incident reports will be compiled and reviewed regularly to identify and implement required corrective actions on a regular basis;
- Annual review of monitoring data and incident reports to determine if modifications are required to the WPP through the adaptive management plan (metrics are the expected changes and thresholds included in the effects assessment);
- Regular review of site inspection records including, but not limited to, waste storage and disposal, access controls to attractants;
- Review of employee and contractor recommended modifications to improve wildlife protection procedures;
- Integrating any additional traditional knowledge and land use information with respect to wildlife that is made available by LFN and RRDC in the future into BMC's management and operating plans;
- Reporting to and updating the BMC/Kaska Environmental Management Advisory Committee;
- Liaising with the Kaska (through the various formal pathways as well as informal pathways), regulatory agencies, Regional Biologists, Conservation Officers, and local communities regarding wildlife issues; and
- Wildlife observations, monitoring programs, and incidents may be required to be followed up with additional controls and mitigations as determined by the YG, in consultation with BMC, the YG Regional Biologist, and affected First Nations (Schedule 2, Clause 2.4 – Lease Agreement 105G07-001).

Corrective actions may include but not be limited to, notice of offence, follow-up, additional training, and reminders during toolbox meetings.

1.7 ROLES AND RESPONSIBILITIES

BMC is responsible for all activities associated with the Project, including implementation and management of this WPP.

1.7.1 Managers and Supervisors

Managers and supervisors have a responsibility to ensure that Project personnel, contractors, suppliers, and visitors are aware of BMC's expectations regarding wildlife mitigation and adhere to these practices. Additional supervisor and manager responsibilities include ensuring that:

- Wildlife awareness orientation is conducted;
- All personnel adhere to mandatory mitigation measures and that corrective actions are taken when workers are non compliant;
- Qualified Environmental Professionals (QEP) are used for those tasks that require specialized environmental expertise; and
- Environmental Monitors receive training from a QEP at a level appropriate for the environmental monitoring tasks they are required to perform and that more specialized tasks are performed under the direct supervision of a QEP.

1.7.2 Personnel, Contractors, Suppliers, and Visitors

All Project personnel including Project employees, contractors, suppliers, and visitors are required to implement this WPP as it pertains to their activities on site. Specifically, these responsibilities include:

- Completing site orientation, including wildlife awareness orientation;
- Adhering to wildlife mitigation measures appropriate to their tasks;
- Recording and reporting incidental wildlife observations on the Wildlife Observation Form and to the Environmental Department; and
- Monitoring and recording wildlife behavioral responses to Project activities and personnel.

1.7.3 Aerial Support

All pilots (helicopter, fixed-wing, and drone) are responsible for:

- Avoiding sensory disturbances to wildlife by adhering to designated flight paths and elevations;
- Following Yukon Environment's *Flying in Caribou Country: How to Minimize Disturbance from Aircraft* (Government of Yukon 2010) and *Flying in Sheep Country: How to Minimize Disturbance from Aircraft* (Mining Environment Research Group 2006); and
- Applying mitigation measures described in Section 5.2.3 and other species-specific mitigations described in this WPP and during on site task risk assessment processes that may be carried out by BMC from time to time.

1.7.4 Environmental Monitors

Personnel designated as Environmental Monitors are responsible for:

- Monitoring operational compliance with wildlife mitigation measures;
- Reporting non-compliance to management;
- Responding to wildlife-personnel interactions; and
- Managing monitoring and incidental wildlife observation records.

When no Environmental Monitors are on site, their role will be assumed by the site Environmental Department Manager, or another suitable person appointed by the Project Manager.

1.7.5 Qualified Environmental Professionals

QEPs (e.g., Registered Professional Biologists) will be consulted or used to conduct work where specialized training and experience is required. This may include but is not necessarily limited to the following fields:

- Wildlife awareness orientation program and other related materials;
- Pre-disturbance breeding bird, bear denning, and other specialized wildlife surveys;
- Wildlife feature assessments (e.g., raptor nests, mineral licks);
- Focal species monitoring programs (e.g., ungulate surveys); and,
- Site- or species-specific management plans that vary from standard mitigation measures or require regulatory variances.

2 WILDLIFE RESOURCES

Wildlife, vegetation, and ecosystem studies were completed prior to, during, and following the YESAB assessment of the Project, resulting in the characterization of baseline conditions against which Project effects will be compared. Information gathered through the earlier Initial Environmental Evaluation (Cominco Ltd. 1996), Yukon Government studies, along with BMC's 2015 to 2023 wildlife baseline studies program, show that the LSA and RSA support a diverse range of wildlife species that vary in abundance based largely on the extent and suitability of seasonal habitats (Alexco Environmental Group 2016 and BMC 2023b).

2.1 ENVIRONMENTAL SETTING

The Project lies within the northern foothills of the Pelly Mountains on the Yukon Plateau near the drainage divide between the Pelly River and Liard River. It is within the Finlayson River watershed, which is a tributary to the Liard River, and is in a transitional zone between two ecoregions, the Yukon Plateau North and the Pelly Mountains Ecoregions (Smith et al. 2004). Elevations within the Project infrastructure and along the Access Road range from approximately 2,000 m to 1,300 m above sea level (ASL).

The Project infrastructure is within subalpine and alpine bioclimate zones, with surrounding topography consisting of rolling hills and steep mountains. It is within an area of discontinuous permafrost, with an active layer up to 2 m, beneath which ice is present. A few small ponds and wetlands occupy the valley bottom within and near the Project infrastructure, with some larger lakes outside the Project Area to the south and east. The Access Road is predominantly within the boreal high bioclimate zone and parallels the lower reaches of Finlayson Creek, this creek flows through boreal forest and occasional wetlands. Shrub and herb cover dominate higher elevations and graduate to open boreal forest at lower elevations. Prevalent species at high elevations include scrub birch (*Betula* sp.), willow (*Salix* spp.), and various lichens and forbs. Forested areas consist of a mix of subalpine fir (*Abies lasiocarpa*) and white spruce (*Picea glauca*), with black spruce (*Picea mariana*) in wetter locations. Tall shrubs are the dominant vegetation cover at subalpine elevations and along riparian corridors.

2.2 KNOWN AND EXPECTED WILDLIFE SPECIES

The RSA supports populations of most mammal species typical of the Yukon's boreal forest and mountain ecosystems (Smith et al. 2004, Alexco Environmental Group 2016). It overlaps part of the annual range of the FCH; however, some elements of the Pelly Herds and Wolf Lake herd may also be present from spring through fall. Moose, grizzly bear, black bear, gray wolf, wolverine, Canada lynx, red fox, American marten, North American beaver, hoary marmot, snowshoe hare, collared pika, and a variety of other furbearers, rodents, and shrews can be found in the RSA (Table 2-1).

The RSA also supports bird communities typical of northern boreal forest, subalpine, and alpine ecosystems (Sinclair et al. 2003, Smith et al. 2004, Alexco Environmental Group 2016). The RSA intersects bird nesting zone B8 of the Bird Conservation Region 4 (BCR4) – Northwestern Interior Forest (Environment and Climate Change Canada 2023). A total of 108 bird species are known to breed within nesting zone B8 (some species nest in multiple ecosystems); 48 species are known to nest in forest ecosystems, 66 species in open ecosystems, and 48 species in wetland ecosystems. Based on expert opinion and known species occurrences within this nesting zone (Sinclair et al. 2003), an additional 22 bird species were added to Table 2-2, for a total of 130 bird species. The northern boundary of the RSA is located adjacent to the Tintina Trench. The trench and its lakes, rivers, and wetlands used as staging sites by migrating waterfowl, follows the lowlands along the eastern slopes of the Pelly Mountains. It is an important migration corridor for Sandhill Crane, Trumpeter Swan, and waterfowl

breeding in northern Yukon and Alaska. Common year-round residents include Common Raven, Canada Jay, Spruce Grouse, Willow and Rock Ptarmigan, and Boreal Chickadee. Typical birds nesting in wetland ecosystems include American Wigeon, Mallard, Green-winged Teal, Lesser Yellowlegs, Solitary Sandpiper, Spotted Sandpiper, Alder Flycatcher, Yellow Warbler, Northern Waterthrush, and Rusty Blackbird to name but a few. Low elevation forests support a variety of songbirds including Olive-sided Flycatcher, Ruby-crowned Kinglet, Yellow-rumped Warbler, Blackpoll Warbler, Northern Flicker, Chipping Sparrow, and Dark-eyed Junco. Higher elevation forests and subalpine shrub provide breeding habitat for several migrant songbirds such as Say's Phoebe, Wilson's Warbler, Townsend's Solitaire, Gray-cheeked Thrush, American Tree Sparrow, and Golden-crowned Sparrow. Despite the apparent abundance of suitable cliff nesting habitat in the southern half of the RSA, Golden Eagle, and Gyrfalcon nest at low densities. Sharp-shinned Hawk, Northern Hawk Owl, and other raptors can also be found in forest ecosystems in the RSA (Table 2-2).

Comprehensive lists of the mammals, amphibians, and birds that are known or expected to occur in the RSA are presented in Table 2-1 and Table 2-2.

Table 2-1: Mammal and Amphibian Species Known or Expected to Occur in the Regional Study Area

Common Name	Scientific Name	General Status of Species in Canada ¹		Likelihood of Occurrence in the Regional Study Area ²
		National	Yukon	
Ungulates				
Moose	<i>Alces alces</i>	N5	S5	A
Mule Deer	<i>Odocoileus hemionus</i>	N5	S3S4	R/X
Thinhorn Sheep	<i>Ovis dalli</i>	N4N5	S4	O
Woodland Caribou	<i>Rangifer tarandus caribou</i>	N3N4	S3S4	A
Carnivores				
American Marten	<i>Martes americana</i>	N5	S5	A
Black Bear	<i>Ursus americanus</i>	N5	S5	A
Coyote	<i>Canis latrans</i>	N5	S5	O
Ermine	<i>Mustela erminea</i>	N5	S5	A
Grey Wolf	<i>Canis lupus</i>	N5	S4	U
Grizzly Bear	<i>Ursus arctos</i>	N3	S3	C
Least Weasel	<i>Mustela nivalis</i>	N5	S4S5	A
Canada Lynx	<i>Lynx canadensis</i>	N5	S5	A
Mink	<i>Mustela vison</i>	N5	S5	U
Red Fox	<i>Vulpes vulpes</i>	N5	S5	C
River Otter	<i>Lontra canadensis</i>	N5	S4	U
Wolverine	<i>Gulo gulo</i>	N3N4	S3	U
Rodents				
Arctic Ground Squirrel	<i>Spermophilus parryii</i>	N5	S4S5	C
Brown Lemming	<i>Lemmus sibiricus</i>	N5	S5	C
Bushy-tailed Woodrat	<i>Neotama cinerea</i>	N5	S3S4	O
Deer Mouse	<i>Peromyscus maniculatus</i>	N5	S5	A
Hoary Marmot	<i>Marmota caligata</i>	N5	S4	A

Common Name	Scientific Name	General Status of Species in Canada ¹		Likelihood of Occurrence in the Regional Study Area ²
		National	Yukon	
Least Chipmunk	<i>Tamias minimus</i>	N5	S5	A
Long-tailed Vole	<i>Microtus longicaudus</i>	N5	S5	O
Meadow Jumping Mouse	<i>Zapus princeps</i>	N5	S2S3	C
Meadow Vole	<i>Microtus pennsylvanicus</i>	N5	S5	A
Muskrat	<i>Ondatra zibethicus</i>	N5	S4S5	A
North American Beaver	<i>Castor canadensis</i>	N5	S5	A
North American Porcupine	<i>Erethizon dorsatum</i>	N5	S5	A
Northern Bog Lemming	<i>Synaptomys borealis</i>	N5	S4	O
Northern Flying Squirrel	<i>Glaucomys sabrinus</i>	N5	S4S5	R
Northern Red-backed Vole	<i>Clethrionomys rutilus</i>	N5	S5	A
Red Squirrel	<i>Tamiasciurus hudsonicus</i>	N5	S5	A
Singing Vole	<i>Microtus miurus</i>	N4	S4	U
Taiga Vole	<i>Microtus xanthognathus</i>	N5	S5	U
Tundra Vole	<i>Microtus oeconomus</i>	N5	S5	C
Woodchuck	<i>Marmota monax</i>	N5	S2S3	X
Lagomorphs				
Collared Pika	<i>Ochotona collaris</i>	N3N4	S3	A
Snowshoe Hare	<i>Lepus americanus</i>	N5	S5	A
Bats				
Little Brown Bat	<i>Myotis lucifugus</i>	N3B,N2N3N	S3B	C
Northern Myotis	<i>Myotis septentrionalis</i>	N2N3B,N2N3N,NUM	S1S2B	R/X
Insectivores				
Black backed Shrew	<i>Sorex arcticus</i>	N5	-	IU
Common Shrew	<i>Sorex cinereus</i>	N5	S5	IU
Dusky Shrew	<i>Sorex monticola</i>	N5	S5	IU
Pygmy Shrew	<i>Sorex hoyi</i>	N5	-	IU
Water Shrew	<i>Sorex palustris</i>	N5	-	IU
Amphibians				
Wood Frog	<i>Lithobates sylvaticus</i>	N5	S4S5	C

¹ First digit: N=National, S=Subnational, second digit: X=Presumed Extirpated, H=Possibly Extirpated, 1=Critically Imperiled, 2=Imperiled, 3=Vulnerable, 4=Apparently Secure, 5=Secure, U=Unrankable, NR=Unranked, final digit: B=Breeding, N=non-breeding, M=Migrant. Data derived from Wild Species 2020: the General Status of Species in Canada (Canadian Endangered Species Conservation Council 2022)²
Occurrence likelihood: A: Abundance, C: Common, U: Uncommon, O: Occasional, R: Rare, X: Accidental, IU=Information unavailable.

Table 2-2: Bird Species Known or Expected to Occur in the Regional Study Area

Common Name	Scientific Name	Nesting Period ^{1 2}	General Status of Species in Canada ³		Likelihood of Occurrence in the Regional Study Area ⁴	
			National	Yukon	Breeding	Migration
Grebes						
Horned Grebe	<i>Podiceps auritus</i>	May 27 – July 27	N4N5B,N4N5N	S4B	X	C
Red-necked Grebe	<i>Podiceps grisegena</i>	May 26 – August 1	N5B,N5N	S4B	X	U
Loons						
Common Loon	<i>Gavia immer</i>	May 27 – August 5	N5B,N5N	S4B	U	C
Red-throated Loon	<i>Gavia stellata</i>	May 15 – August 31	N4N5B,N5N	S3B	X	R
Pacific Loon	<i>Gavia pacifica</i>	June 6 – July 26	N5B,N3N4N	S4B	R	U
Waterfowl						
American Green-winged Teal	<i>Anas crecca carolinensis</i>	May 22 – July 19	N5B,N5N	S5B	U	U
American Wigeon	<i>Anas americana</i>	May 21 – July 23	N5B,N5N	S4B	U	C
Barrow's Goldeneye	<i>Bucephala islandica</i>	April 15 – August 31 ²	N5B,N4N,N4N5M	S4B	O	C
Blue-winged Teal	<i>Spatula discors</i>	May 20 – July 28	N5B	S4B	R	U
Bufflehead	<i>Bucephala albeola</i>	May 21 – July 18	N5B,N5N	S4B	U	C
Canada Goose	<i>Branta canadensis</i>	April 15 – August 15	N5B,N5N	S4S5B	C	C
Canvasback	<i>Aythya valisineria</i>	May 13 – July 19	N5B,N4N	S5B	R	R
Common Goldeneye	<i>Bucephala clangula</i>	May 13 – July 14	N5B,N5N	S4B,S3N	U	C
Common Merganser	<i>Mergus merganser</i>	May 12 – August 2	N5B,N5N	S4B,S3N	O	C
Greater Scaup	<i>Aythya marila</i>	May 28 – August 10	N5B,N5N	S2S3B	R	C
Harlequin Duck	<i>Histrionicus histrionicus</i>	May 15 – August 15	N4B,N4N	S3B	X	X
Lesser Scaup	<i>Aythya affinis</i>	June 3 – August 4	N5B,N5N	S4B	R	C
Mallard	<i>Anas platyrhynchos</i>	May 7 – July 24	N5B,N5N	S4B	C	C
Northern Pintail	<i>Anas acuta</i>	May 8 – July 16	N5B,N4N5N	S4B	R	U
Northern Shoveler	<i>Spatula clypeata</i>	May 15 – July 19	N5B,N5N	S5B	U	U
Red-breasted Merganser	<i>Mergus serrator</i>	May 22 – August 6	N5B,N5N	S4B	U	C

Common Name	Scientific Name	Nesting Period ^{1 2}	General Status of Species in Canada ³		Likelihood of Occurrence in the Regional Study Area ⁴	
			National	Yukon	Breeding	Migration
Ring-necked Duck	<i>Aythya collaris</i>	April 15 – August 31	N5B,N5N	S4S5B	U	C
Trumpeter Swan	<i>Cygnus buccinator</i>	May 10 – July 21	N4N5B,N5N	S4B,S1N,S3M	O	C
White-winged Scoter	<i>Melanitta deglandi</i>	June 2 – August 6	N5B,N5N	S4B	X	C
Grouse and Ptarmigans						
Rock Ptarmigan	<i>Lagopus muta</i>	May 30 – July 15	N5	S4	U	U
Ruffed Grouse	<i>Bonasa umbellus</i>	May 5 – July 7	N5	S4	C	C
Spruce Grouse	<i>Falcipennis canadensis</i>	May 9 – July 12	N5	S5	C	C
White-tailed Ptarmigan	<i>Lagopus leucura</i>	June-15 – September 15 ²	N5	S4	X	R
Willow Ptarmigan	<i>Lagopus lagopus</i>	May 22 – August 3	N5	S4S5	U	U
Diurnal Birds of Prey						
Bald Eagle	<i>Haliaeetus leucocephalus</i>	April 20 – September 5 ²	N5B,N5N	S4B,S2N	O	O
Golden Eagle	<i>Aquila chrysaetos</i>	March 25 – August 24	N4N5B,N4N5N	S3B	X	U
Northern Goshawk	<i>Accipiter gentilis</i>	April 15 – July 31	N5B,N4N5N,N4N5M	S4	R	U
Northern Harrier	<i>Circus cyaneus</i>	May 22 – August 5	N5B,N4N	S4B	O	C
Red-tailed Hawk	<i>Buteo jamaicensis</i>	April 28 – August 7	N5B,N5N	S4B	R	C
Sharp-shinned Hawk	<i>Accipiter striatus</i>	May 23 – August 14	N5B,N5N	S4B	R	U
Falcons						
American Kestrel	<i>Falco sparverius</i>	May 15 – August 13	N5B,N4N	S2B	O	U
Gyr Falcon	<i>Falco rusticolus</i>	April 20 – August 10 ²	N4N5B,N5N	S3	X	R
Merlin	<i>Falco columbarius</i>	May 10 – August 15	N5B,N5N	S4B	O	U
Peregrine Falcon	<i>Falco peregrinus</i>	June 1 – August 15 ²	N4N5B,N4N	S3B		R
Owls						
Boreal Owl	<i>Aegolius funereus</i>	April 11 – July 28	N4N5	S4	X	X
Great Gray Owl	<i>Strix nebulosa</i>	April 5 – July 1	N5	S3	X	R
Great Horned Owl	<i>Bubo virginianus</i>	February 21 – April 2 ²	N5	S4	R	R
Long-eared Owl	<i>Asio otus</i>	April 30 – July 20	N4N5B,N4N5N	SNA	R	O
Northern Hawk Owl	<i>Surnia ulula</i>	April 19 – July 24	N5	S4	U	U

Common Name	Scientific Name	Nesting Period ^{1 2}	General Status of Species in Canada ³		Likelihood of Occurrence in the Regional Study Area ⁴	
			National	Yukon	Breeding	Migration
Short-eared Owl	<i>Asio flammeus</i>	April 6 – July 21	N3N4B,NUN,N4M	S3B	R	O
Gulls and Terns						
Arctic Tern	<i>Sterna paradisaea</i>	June 4 – July 27	N5B	S4B	R	R
Bonaparte's Gull	<i>Chroicocephalus philadelphia</i>	May 23 – July 23	N5B,N5N	S4B	O	O
Herring Gull	<i>Larus argentatus</i>	May 18 – July 30	N5B,N5N	S4B	R	U
Short-billed Gull	<i>Larus canus</i>	May 16 – July 24	N4N5B,N4N	S4B	C	C
Shorebirds						
American Golden-Plover	<i>Pluvialis dominica</i>	June 2 – July 27	N3N4B,N5M	S3B	O	O
Least Sandpiper	<i>Calidris minutilla</i>	June 1 – July 25	N5B,N1N2N	S4B	U	U
Lesser Yellowlegs	<i>Tringa flavipes</i>	May 16 – July 15	N3B,N4M	S3B	U	U
Red-necked Phalarope	<i>Phalaropus lobatus</i>	May 30 – July 15	N4B,N3N4N	S3B	O	U
Semipalmated Plover	<i>Charadrius semipalmatus</i>	May 29 – July 26	N5B	S4B	R	R
Solitary Sandpiper	<i>Tringa solitaria</i>	June 2 – July 19	N5B	S4B	O	O
Spotted Sandpiper	<i>Actitis macularius</i>	June 1 – July 23	N5B,N3N	S4S5B	U	U
Wandering Tattler	<i>Tringa incana</i>	May 20 – July 30 ²	N3B	S3B	O	U
Wilson's Snipe	<i>Gallinago delicata</i>	May 26 – July 17	N5B	S5B	C	C
Rails and Cranes						
American Coot	<i>Fulica americana</i>	May 20 – August 31 ²	N5B,N4N	S2B	R	U
Sandhill Crane	<i>Grus canadensis</i>	May 14 – July 15	N5B,N3N	S3B,S4M		C
Sora	<i>Porzana carolina</i>	May 15 – August 15 ²	N5B	S4B	R	O
Kingfishers						
Belted Kingfisher	<i>Megasceryle alcyon</i>	May 25 – August 6	N5B,N4N	S4B	O	O
Nightjars						
Common Nighthawk	<i>Chordeiles minor</i>	April 7 – August 2	N4N5B,N5M	S3B	R	R
Woodpeckers						
American Three-toed Woodpecker	<i>Picoides dorsalis</i>	May 19 – July 17	N5	S5	U	U

Common Name	Scientific Name	Nesting Period ^{1 2}	General Status of Species in Canada ³		Likelihood of Occurrence in the Regional Study Area ⁴	
			National	Yukon	Breeding	Migration
Black-backed Woodpecker	<i>Picoides arcticus</i>	May 16 – July 21	N5	S4	X	X
Downy Woodpecker	<i>Dryobates pubescens</i>	May 12 – July 18	N5	S4	X	X
Hairy Woodpecker	<i>Dryobates villosus</i>	May 4 – July 6	N5	S5	R	R
Northern Flicker	<i>Colaptes auratus</i>	May 23 – July 31	N5B,N5N	S4B	C	C
Yellow-bellied Sapsucker	<i>Sphyrapicus varius</i>	May 25 – July 21	N5B,N3N	S4B	R	R
Songbirds – Jays, Crows, and Allies						
Canada Jay	<i>Perisoreus canadensis</i>	March 1 – May 20 ²	N5	S5	A	A
Common Raven	<i>Corvus corax</i>	March 15 – June 30 ²	N5	S5	U	U
Songbirds – Shrikes and Vireos						
Northern Shrike	<i>Lanius excubitor</i>	May 15 – June 30 ²	N5B,N5N	S3B,SNRN	U	U
Warbling Vireo	<i>Vireo gilvus</i>	May 24 – June 30 ²	N5B	S5B	U	U
Songbirds – Thrushes and Allies						
American Dipper	<i>Cinclus mexicanus</i>	April 15 – August 20 ²	N5	S4	O	U
American Robin	<i>Turdus migratorius</i>	May 27 – August 2	N5B,N5N	S5B	C	C
Gray-cheeked Thrush	<i>Catharus minimus</i>	May 28 – July 16	N5B	S4B	O	O
Hermit Thrush	<i>Catharus guttatus</i>	May 29 – August 9	N5B,N4N	S5B	O	U
Mountain Bluebird	<i>Sialia currucoides</i>	May 22 – August 5	N5B	S2B	R	R
Swainson's Thrush	<i>Catharus ustulatus</i>	June 8 – August 4	N5B	S5B	C	C
Townsend's Solitaire	<i>Myadestes townsendi</i>	May 29 – August 9	N5B,NUN	S5B	U	U
Varied Thrush	<i>Ixoreus naevius</i>	May 21 – August 9	N5B,NUN	S5B	C	C
Songbirds – Flycatchers and Allies						
Alder Flycatcher	<i>Empidonax alnorum</i>	June 21 – August 5	N5B	S5B	C	C
Hammond's Flycatcher	<i>Empidonax hammondi</i>	June 5 – August 15	N5B	S5B	U	U
Least Flycatcher	<i>Empidonax minimus</i>	June 3 – July 25	N5B	S4B		
Olive-sided Flycatcher	<i>Contopus cooperi</i>	June 11 – August 14	N4B	S3B	U	U
Say's Phoebe	<i>Sayornis saya</i>	May 15 – July 21	N5B	S5B	O	O
Western Wood-Pewee	<i>Contopus sordidulus</i>	June 15 – August 11	N4B	S3S4B	U	U

Common Name	Scientific Name	Nesting Period ^{1 2}	General Status of Species in Canada ³		Likelihood of Occurrence in the Regional Study Area ⁴	
			National	Yukon	Breeding	Migration
Yellow-bellied Flycatcher	<i>Empidonax flaviventris</i>	June 14 – August 3	N5B	S4B	O	O
Songbird – Swallows						
Bank Swallow	<i>Riparia riparia</i>	May 30 – August 2	N4B,N5M	S3S4B	O	O
Barn Swallow	<i>Hirundo rustica</i>	May 30 – August 22	N4N5B	S2B	R	R
Cliff Swallow	<i>Petrochelidon pyrrhonota</i>	June 2 – August 18	N5B	S3B	O	O
Tree Swallow	<i>Tachycineta bicolor</i>	May 24 – July 23	N5B	S4B	O	O
Violet-green Swallow	<i>Tachycineta thalassina</i>	June 12 – July 31	N5B	S4B	U	U
Songbirds – Blackbirds						
Red-winged Blackbird	<i>Agelaius phoeniceus</i>	May 28 – July 19	N5B,N5N	S4B	O	U
Rusty Blackbird	<i>Euphagus carolinus</i>	May 17 – July 16	N4B,NUN	S4B	U	U
Songbirds – Sparrows, Finches, and Allies						
American Tree Sparrow	<i>Spizella arborea</i>	May 27 – July 18	N5B,N5N	S3S4B	C	C
Chipping Sparrow	<i>Spizella passerina</i>	May 29 – August 3	N5B	S5B	O	O
Common Redpoll	<i>Acanthis flammea</i>	May 25 – August 1	N5B,N5N	S5	U	U
Dark-eyed Junco	<i>Junco hyemalis</i>	June 3 – August 12	N5B,N5N	S5B,S2N	A	A
Fox Sparrow	<i>Passerella iliaca</i>	May 21 – July 27	N5B,N4N	S5B	C	C
Golden-crowned Sparrow	<i>Zonotrichia atricapilla</i>	June 4 – August 17	N5B,N5?N	S5B	U	U
Lincoln's Sparrow	<i>Melospiza lincolni</i>	May 30 – July 26	N5B,N5N	S5B	O	U
Pine Grosbeak	<i>Pinicola enucleator</i>	May 20 – July 30	N5	S4	O	O
Pine Siskin	<i>Spinus pinus</i>	April 21 – August 18	N5B,N5N	S5B	O	O
Purple Finch	<i>Haemorhous purpureus</i>	June 2 – August 13	N5B,N5N	S4B		R
Savannah Sparrow	<i>Passerculus sandwichensis</i>	May 28 – August 2	N5B,N4N	S5B	O	U
Smith's Longspur	<i>Calcarius pictus</i>	May 25 – July 30 ²	N4B	S3B	R	R
Snow Bunting	<i>Plectrophenax nivalis</i>	May 28 – August 2	N5B,N5N	S3B	X	U
Song Sparrow	<i>Melospiza melodia</i>	June 15 – September 5 ²	N5B,N5N	S3B	X	R
White-crowned Sparrow	<i>Zonotrichia leucophrys</i>	May 26 – August 1	N5B,N5N	S5B	C	A
White-throated Sparrow	<i>Zonotrichia albicollis</i>	June 2 – July 30	N5B,N5N	S3B	X	X

Common Name	Scientific Name	Nesting Period ^{1 2}	General Status of Species in Canada ³		Likelihood of Occurrence in the Regional Study Area ⁴	
			National	Yukon	Breeding	Migration
White-winged Crossbill	<i>Loxia leucoptera</i>	Jan 1 – Dec 31 ²	N5	S5	O	O
Songbirds – Chickadees, Nuthatches, and Wrens						
Black-capped Chickadee	<i>Poecile atricapillus</i>	May 15 – July 16	N5	S4	R	R
Boreal Chickadee	<i>Poecile hudsonicus</i>	May 20 – July 29	N5	S5	C	C
Pacific Wren	<i>Troglodytes pacificus</i>	May 15 – July 15 ²	N5B,N4M	SUB	R	R
Red-breasted Nuthatch	<i>Sitta canadensis</i>	May 20 – July 23	N5	S4	O	O
Songbirds – Kinglets						
Ruby-crowned Kinglet	<i>Corthylio calendula</i>	May 31 – August 5	N5B,N5N	S5B	C	C
Songbirds – Warblers						
Blackpoll Warbler	<i>Setophaga striata</i>	June 10 – August 7	N5B	S5B	U	U
Common Yellowthroat	<i>Geothlypis trichas</i>	June 5 – August 1	N5B,N3N	S5B	O	O
Northern Waterthrush	<i>Parkesia noveboracensis</i>	May 25 – July 17	N5B	S5B	U	U
Orange-crowned Warbler	<i>Leiothlypis celata</i>	June 2 – July 26	N5B,N3N	S5B	C	C
Tennessee Warbler	<i>Leiothlypis peregrina</i>	June 4 – July 24	N5B	S5B	R	R
Townsend's Warbler	<i>Setophaga townsendi</i>	June 9 – August 13	N5B	S3B	R	R
Wilson's Warbler	<i>Cardellina pusilla</i>	June 4 – August 3	N5B	S5B	O	C
Yellow-rumped Warbler	<i>Setophaga coronata</i>	May 31 – August 4	N5B,N4N	S5B	C	A
Yellow Warbler	<i>Setophaga petechia</i>	May 31 – July 20	N5B	S5B	C	C
Songbirds – Others						
American Pipit	<i>Anthus rubescens</i>	June 7 – August 16	N5B,N4N	S5B	O	C
Bohemian Waxwing	<i>Bombycilla garrulus</i>	May 20 – August 15 ²	N5B,N5N	S4B,S3N	U	U
Horned Lark	<i>Eremophila alpestris</i>	May 10 – July 30 ²	N5B,N5N	S4B	O	O

¹ Nesting periods as listed by Birds Canada <https://naturecounts.ca/apps/rnest/index.jsp?lang=EN>.

² Nesting periods for this species was not available on Birds Canada so the combination of the Birds of the Yukon Territory book and the Birds of the World website were used.

³ First digit: N=National, S=Subnational, second digit: X=Presumed Extirpated, H=Possibly Extirpated, 1=Critically Imperiled, 2=Imperiled, 3=Vulnerable, 4=Apparently Secure, 5=Secure, U=Unrankable, NR=Unranked, final digit: B=Breeding, N=non-breeding, M=Migrant. Data derived from Wild Species 2020: the General Status of Species in Canada (Canadian Endangered Species Conservation Council 2022).

⁴ Occurrence likelihood: A=Abundance, C=Common, U=Uncommon, O=Occasional, R=Rare, and X=Accidental.

2.3 SPECIES OF CONSERVATION CONCERN

The conservation status of wildlife species was identified based on the most recent recommendations by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) and their current designation in the most recent amendment to Schedule 1 of the *Species At Risk Act* (SARA) (Environment and Climate Change Canada 2021a, ECCC 2023). COSEWIC is an advisory panel that assesses the national status of wildlife species that may be at risk and provides designation recommendations to the Minister of Environment and Climate Change Canada. The Minister considers the COSEWIC designations when establishing the official list of species at risk under Schedule 1 of the SARA. The SARA registry groups species into one of three schedules:

- Schedule 1 — the official list of species at risk in Canada, includes species that are designated Extirpated, Endangered, Threatened, or Special Concern; and,
- Schedule 2 and 3 — species designated Endangered or Threatened (Schedule 2) or Special Concern (Schedule 3) by COSEWIC but that have yet to be re-assessed under the revised criteria or that are awaiting amendments to the SARA for inclusion to Schedule 1.

Endangered, Threatened, and species of Special Concern are defined under the SARA as follows (Government of Canada, 2002):

- **Endangered** species means a wildlife species that is facing imminent extirpation or extinction;
- **Threatened** species means a wildlife species that is likely to become an endangered species if nothing is done to reverse the factors leading to its extirpation or extinction; and,
- Species of **Special Concern** means a wildlife species that may become a threatened or an endangered species because of a combination of biological characteristics and identified threats.

While the general prohibitions under the SARA apply only to species designated as Endangered, Threatened, or Extirpated in Schedule 1 when found on federal lands (e.g., National Wildlife Areas, National Parks), the provisions related to environmental assessments apply across Canada to all species listed in Schedule 1, including species of Special Concern (Environment and Climate Change Canada 2021a).

Wildlife species listed by the COSEWIC and under the SARA (Government of Canada, 2002) as Endangered, Threatened, or of Special Concern that known or expected to occur in the RSA are presented in Table 2-3. The COSEWIC and SARA status designations sometimes differ because of delays in amending the SARA or, in some instances, the Minister may elect to set aside the COSEWIC designation recommendation. Recent COSEWIC assessments recommended changing the SARA Schedule 1 status for Short-eared Owl from Special Concern to Threatened, Lesser Yellowlegs from Not at Risk to Threatened, and Barn Swallow from Threatened to Special Concern (COSEWIC 2020, 2021a, b).

Table 2-3: Species of Conservation Concern Known or Expected to Occur in the Regional Study Area

Common Name	Scientific Name	COSEWIC ^{1 2}	SARA ^{1 2}	Primary Management Responsibility ⁵	Observed in LSA
MAMMALS					
Collared Pika	<i>Ochotona collaris</i>	SC (2011)	SC (2017)	YG	Yes
Grizzly Bear	<i>Ursus arctos</i>	SC (2012)	SC (2018)	YG	Yes
Little Brown Myotis	<i>Myotis lucifugus</i>	E (2013)	E (2014)	YG	Myotis sp. observed
Northern Myotis	<i>Myotis septentrionalis</i>	E (2013)	E (2014)	YG	Myotis sp. observed
Wolverine	<i>Gulo gulo</i>	SC (2014)	SC (2018)	YG	Yes
Woodland Caribou ⁴	<i>Rangifer tarandus</i>	SC (2014)	SC (2005)	YG	Yes
BIRDS					
Bank Swallow	<i>Hirundo riparia</i>	T (2013)	T (2017)	ECCC	No
Barn Swallow	<i>Hirundo rustica</i>	SC (2021)	T (2017) ³	ECCC	Yes
Common Nighthawk	<i>Chordeiles minor</i>	SC (2018)	SC (2023)	ECCC	Yes
Horned Grebe	<i>Podiceps auritus</i>	SC (2009)	SC (2017)	ECCC	No
Lesser Yellowlegs	<i>Tringa flacipes</i>	T (2020)	- ³	ECCC	Yes
Olive-sided Flycatcher	<i>Contopus cooperi</i>	SC (2018)	SC (2023)	ECCC	Yes
Red-necked Phalarope	<i>Phalaropus lobatus</i>	SC (2014)	SC (2019)	ECCC	Yes
Rusty Blackbird	<i>Euphagus carolinus</i>	SC (2017)	SC (2009)	ECCC	Yes
Short-eared Owl	<i>Asio flammeus</i>	T (2021)	SC (2012) ³	YG	Yes
INSECTS					
Gypsy Cuckoo Bumble Bee	<i>Bombus bohemicus</i>	E (2014)	E (2018)	YG	No
Western Bumble Bee	<i>Bombus occidentalis occidentalis</i>	T (2014)	- ³	YG	No
	<i>Bombus occidentalis mckayi</i>	SC (2014)	- ³	YG	No

¹ Conservation status for each species was obtained from the Species at Risk Public Registry (<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>).

² E=Endangered, T=Threatened, SC=Special Concern

³ As of January 19, 2024, the SARA does not yet reflect the COSEWIC status change recommendation.

⁴ Woodland Caribou from the northern mountain population with potential to occur in the Project Regional Study Area are from the Finlayson Caribou Herd.

⁵ ECCC=Environment and Climate Change Canada, YG=Yukon Government.

2.4 TRADITIONALLY IMPORTANT SPECIES

Employees and contractors are required to respect that the Project is located on Kaska Traditional Territory and there are many wildlife species that are traditionally important for subsistence, cultural, and/or spiritual reasons. Traditionally important species to Kaska based on engagement to date are caribou, moose, grizzly bear, wolverine, wolf, snowshoe hare, lynx, marten, beaver, hoary marmot, raven, ptarmigan, and waterfowl.

2.5 VALUED COMPONENTS

Table 2-4 presents the wildlife subcomponents (i.e., subcomponents to the Wildlife Valued Component) that were selected for assessment in BMC's Project Proposal (BMC Minerals Ltd. 2017), their conservation status, the reasons for their selection, and the group expressing an interest in the species.

Table 2-5 presents the other wildlife species that are known to or may occur in the RSA but that were not selected as subcomponents for the environmental assessment, the rationale for their exclusion, and their level of interaction with the Project (BMC Minerals Ltd. 2017). Reasons why these species were excluded include: not likely to interact with the Project in high numbers; secure nationally and in Yukon; not considered at risk; not identified as species of concern by stakeholders; not abundant in the RSA; represented by other umbrella species in the assessment; and/or not sensitive to disturbance.

Table 2-4: Rationale for the Selection of Wildlife Subcomponents for the Project Assessment

Subcomponent	Species/Population	Conservation Status ^{1 2}	Reasons for Selection	Group Expressing Interest
Finlayson Caribou Herd	Northern Mountain population of woodland caribou (<i>Rangifer tarandus caribou</i>)	Special Concern (COSEWIC 2014a)	SARA - subsection 79 (2); Kaska cultural keystone species for hunting and cultural purposes; High cultural value, strong regional interest; Calving and rut habitat, and migration corridors are a conservation concern for Environment Yukon	Ross River Dena Council (RRDC) Elders and Kaska members; Yukon Government; Focal species in the Kaska land management practices; Federal Government
Moose	<i>Alces alces</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Kaska cultural keystone species for hunting and cultural purposes; High cultural value, strong regional interest; Primary harvest species in the region	RRDC Elders and Kaska members; Yukon Government; Focal species in the Kaska land management practices
Grizzly Bear	Western population of grizzly bear (<i>Ursus arctos</i>)	Special Concern (COSEWIC 2012)	SARA - subsection 79 (2); Species sensitive to disturbance; Potential for human–bear conflict	RRDC Elders and Kaska members; Yukon Government; Federal Government
Wolverine	<i>Gulo gulo</i>	Special Concern (COSEWIC 2014b)	SARA - subsection 79 (2); Species sensitive to disturbance; Representative species for furbearers of cultural importance to Kaska for cultural and trapping purposes [such as marten, beaver, muskrat, mink, porcupine, squirrel, gopher]	RRDC and Kaska members; Federal Government
Grey Wolf	<i>Canis lupus</i>	Secure (National) to Apparently Secure (Yukon) (Canadian Endangered Species Conservation Council 2022)	Important predator-prey relationship with FCH and moose in the region; Representative species for furbearers of cultural importance to Kaska for cultural and trapping purposes (such as fox and lynx)	RRDC and Kaska members
Collared Pika	<i>Ochotona collaris</i>	Special Concern (COSEWIC 2011)	SARA - subsection 79 (2); Habitat specialist; Sensitive to disturbance; Representative species for small mammals of cultural importance to Kaska for cultural and trapping purposes (such as groundhog/marmot, squirrel, gopher)	Yukon Government; Federal Government

Subcomponent	Species/Population	Conservation Status ^{1 2}	Reasons for Selection	Group Expressing Interest
Little Brown Myotis	<i>Myotis lucifugus</i>	Endangered (COSEWIC 2013a)	SARA - subsection 79 (2); Habitat specialist; Unknown population status in Yukon	Yukon Government; Federal Government
Cliff-Nesting Raptors	Golden Eagle (<i>Aquila chrysaetos</i>), Gyr Falcon (<i>Falco rusticolus</i>), Peregrine Falcon (<i>Falco peregrinus</i>)	Apparently Secure (National) to Vulnerable (Yukon) (Canadian Endangered Species Conservation Council 2022)	SARA - subsection 79 (2); Kaska focal species; Habitat specialist; Gyr Falcon and Peregrine Falcon are specially protected wildlife in Yukon <i>Wildlife Act</i>	Yukon Government; Federal Government
Passerine birds	Olive-sided Flycatcher (<i>Contopus cooperi</i>)	Special Concern (COSEWIC 2018a)	SARA - subsection 79 (2); Kaska focal species; Protected by the <i>Migratory Birds Convention Act</i> ; Representative species for passerines	Yukon Government; Federal Government
Waterfowl	Ducks, swans, geese, waterbirds	Varies by species	SARA - subsection 79 (2), for those species at risk; Kaska focal species; Protected by the <i>Migratory Birds Convention Act</i>	Yukon Government; Federal Government
Bumble bees	Gypsy cuckoo bumble bee (<i>Bombus bohemicus</i>), western bumble bee (<i>Bombus occidentalis mckayi</i>)	Gypsy cuckoo bumble bee – Endangered (COSEWIC 2014c); Western bumble bee – Special Concern (COSEWIC 2014d)	SARA - subsection 79 (2), for those species at risk	Yukon Government

¹ Conservation status for each species was obtained from the Canadian Endangered Species Conservation Council (Canadian Endangered Species Conservation Council 2022), the Species at Risk Public Registry (<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>), and the Wildlife Act (Government of Yukon 2002b).

² The conservation status of some wildlife species in this table differ from those presented in the Project proposal to reflect changes in conservation status since 2017.

Table 2-5: Rationale for Exclusion of Wildlife Species as Subcomponents for the Project Assessment

Subcomponent	Species/Population	Conservation Status ^{1 2}	Potential Interaction with the Project	Reason for Exclusion
Tinhorn Sheep	<i>Ovis dalli</i>	Secure/Apparently Secure (national) to Apparently Secure (Yukon) (Canadian Endangered Species Conservation Council 2022)	Occurs in RSA occasionally	No spatial or temporal overlap with Wildlife Key Area (WKA) – no interaction with the LSA Sheep populations and Kaska harvest occur south of the Project in the North Lakes and Liard headwaters regions from the ethnographic report (Dialectic Research Services 2016), Yukon Government (YG) and baseline wildlife studies
Black Bear	<i>Ursus americanus</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Occurs along Access Road; unlikely to occur near Project Footprint in upper Geona Creek valley	Limited interaction in the proposed Project Footprint; mitigation for grizzly bear should mitigate potential effects on black bear
Mule Deer	<i>Odocoileus hemionus</i>	Secure (national) to Vulnerable/Apparently Secure (Yukon) (Canadian Endangered Species Conservation Council 2022)	Unlikely; has not been observed in the LSA or RSA	Uncommon in the RSA; Project is at northern extent of species range; species not at risk
Coyote	<i>Canis latrans</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Likely occurs along Access Road; no direct observations	Species not at risk; species adaptable to human disturbance
Red Fox	<i>Vulpes vulpes</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Occurs in the LSA; assumed to be distributed across entire RSA	Species not at risk; species adaptable to human disturbance
Canada Lynx	<i>Lynx canadensis</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Occurs in the LSA; distribution unknown	Species not at risk; Project interaction expected to be minimal as lynx populations expected to remain stable
Snowshoe Hare	<i>Lepus americanus</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Occurs in the LSA; assumed to be distributed across entire RSA	Species not at risk; species adaptable to human disturbance
Hoary Marmot	<i>Marmota caligata</i>	Secure (national) to Apparently Secure (Yukon) (Canadian Endangered Species Conservation Council 2022)	Occurs in the LSA, dens located on mountain slopes in LSA	Species not at risk; mitigation for collared pika should also mitigate effects on hoary marmot
North American Porcupine	<i>Erethizone dorsatum</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Occurs along Access Road; unlikely to occur near Project Footprint in upper Geona Creek valley	Species not at risk; species adaptable to human disturbance; limited interaction with Project Footprint
American Marten	<i>Martes americanus</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Occurs along Access Road; limited occurrence near Project Footprint in upper Geona Creek valley	Species not at risk; species adaptable to human disturbance; limited interaction with Project Footprint

Subcomponent	Species/Population	Conservation Status ^{1 2}	Potential Interaction with the Project	Reason for Exclusion
North American Beaver	<i>Castor canadensis</i>	Secure (Canadian Endangered Species Conservation Council 2022)	Limited occurrence in the LSA; distribution unknown	Species not at risk; no recent sign of beaver in the Project Footprint
Woodchuck	<i>Marmota monax</i>	Secure (national) to Imperiled/Vulnerable (Yukon) (Canadian Endangered Species Conservation Council 2022)	May occur in LSA, according to YCDC 2015	Not observed in the LSA
Northern Myotis	<i>Myotis septentrionalis</i>	Endangered (COSEWIC 2013a)	May occur in LSA, according to YCDC 2015	Represented by little brown myotis in the assessment
Wood Frog	<i>Lithobates sylvatica</i>	Secure (national) to Apparently Secure/Secure (Yukon) (Canadian Endangered Species Conservation Council 2022)	May occur in the LSA; distribution unknown; no observations made	Species not at risk; has not been observed in the LSA
Bank Swallow	<i>Riparia riparia</i>	Threatened (COSEWIC 2013b)	May occur in LSA, according to YCDC 2015	Represented by olive-sided flycatcher in the assessment
Barn Swallow	<i>Hirundo rustica</i>	Threatened ³ (SARA) and Special Concern (COSEWIC 2021b)	Observed in the LSA	Represented by olive-sided flycatcher in the assessment
Red-necked Phalarope	<i>Phalaropus lobatus</i>	Special Concern (COSEWIC 2014e)	Observed in the LSA	Represented by olive-sided flycatcher in the assessment
Rusty Blackbird	<i>Euphagus carolinus</i>	Special Concern (COSEWIC 2017)	May occur in LSA, according to YCDC 2015	Represented by olive-sided flycatcher in the assessment
Horned Grebe	<i>Podiceps auritus</i>	Special Concern (COSEWIC 2009)	May occur in LSA, according to Environment and Climate Change Canada	Represented by waterfowl in the assessment
Common Nighthawk	<i>Chordeiles minor</i>	Special Concern (COSEWIC 2018b)	May occur in LSA, according to YCDC 2015	Represented by raptors in the assessment
Short-eared Owl	<i>Asio flammeus</i>	Special Concern ³ (SARA) and Threatened (COSEWIC 2021a)	May occur in LSA, according to YCDC 2015	Represented by raptors in the assessment
Western Bumble Bee	<i>Bombus occidentalis mckayi</i>	Western bumble bee – Special Concern (COSEWIC 2014d)	Bumble bees observed in LSA	Represented by gypsy cuckoo bumblebee in the assessment

¹ Conservation status for each species was obtained from the Canadian Endangered Species Conservation Council (Canadian Endangered Species Conservation Council 2022) and the Species at Risk Public Registry (<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>).

² The conservation status of some wildlife species in this table differ from those presented in the Project proposal to reflect changes in conservation status since 2017.

³ As of January 19, 2024, the SARA does not yet reflect the COSEWIC status change recommendation.

3 WILDLIFE PROTECTION PROCEDURES

3.1 WILDLIFE PROTECTION HIERARCHY

In recognition of the potential disturbance and effects that the Construction, Operations and Closure phases of the Project may have on wildlife and habitat, control and mitigation measures will be implemented to prevent or reduce these effects. Some measures may be general in nature and applicable to all species, areas, and phases of the Project. Others may be phase, species, area, and/or time-specific. Control and mitigation measures will be subject to routine review and modification as necessary to ensure their ongoing efficacy. Avoidance of effects prior to any occurrence will be the primary protection for wildlife and habitat.

BMC's hierarchy of protection measures are designed to avoid, eliminate, reduce, minimize, or restore (as appropriate) environmental impacts. They will be applied in the following order of preference (hierarchy):

1. Avoidance of activities that have the potential for adverse effects;
2. Eliminate adverse effects through planning and engineering designs and controls;
3. Application of mitigations during Construction, Operations, and Closure; and
4. Restoration of impacted wildlife habitat back to baseline levels.

In addition to the hierarchy listed above, the Project's Decision Document includes Conditions 10 and 11 which require (in part) YG and FCHOC to:

- Condition #10(a)(v): consider on an annual basis the identification of additional mitigations such as offset measures that may be necessary to reduce adverse effects based on traditional knowledge or new information from the project-specific and range wide monitoring.
- Condition #11(a)(i): The results of the desktop review will inform the following: The need for and collection of additional data and project effects monitoring information, and identification of offset measures as required for unmitigated effects.
- Condition #11(a)(iii): The FCHOC will review and provide recommended actions, as appropriate, such as offsetting measures, to the YG regulator(s) for any additional mitigations or monitoring.
- Condition #11(d)(e): The FCH management plan will consider the following topic areas upon further discussion with affected First Nations: Habitat restoration and rehabilitation measures, and other offsetting measures where required.

As described in Section 1.5.3, once the FCHOC has reviewed this WPP, applicable monitoring data and other information as required, and the YG regulator deems the recommendations (including offsets) from the FCHOC to be appropriate, this WPP will be amended as required.

In addition, the Project's Decision Document also includes Condition #41:

- The Proponent shall undertake the identification of offsetting measures and develop a plan, with the objective to address residual adverse effects to the Finlayson Caribou Herd and their habitat in consideration of the Management Plan for the Northern Mountain Population of Woodland Caribou (*Rangifer tarandus caribou*) in Canada. The Proponent shall develop the plan in consultation with Kaska, including a schedule for implementation.

While it is unclear how the offsetting components of Conditions #10 and #11 are linked to Condition #41, offsetting appears to be required in the hierarchy of mitigations. As described in Section 1.5.3.8, BMC is committed to identifying offsetting measured and developing a plan and its schedule for implementation in consultation with Kaska. This WPP plan will be amended to include the Offsetting Plan, upon approval by YG.

3.2 TRAINING AND EDUCATION

The wildlife training program will consist of a combination of on-site orientation and training programs intended to educate Project employees and contractors about wildlife policies, safety, and protection measures and all the commitments made by BMC to protect wildlife. Compliance with the policies described in this plan will be a condition of employment for both employees and contractors. The policies and requirements of the WPP will be presented in conjunction with site orientation and training. A written copy of WPP training materials will be provided to all site personnel. Upon request by BMC, ENV will provide assistance in reviewing program materials and making related presentations to mine personnel (Schedule 2, Clause 1.1[i] – Lease Agreement 105G07-001).

The wildlife orientation program will include:

- Wildlife awareness including a summary of the wildlife species known or expected to occur in the vicinity of the Project with a focus on valued components (Sections 2.2 to 2.5);
- Identified sensitive seasonal time windows and habitats (Section 3.3);
- Requirements for employee and contractor conduct;
- Wildlife safety and awareness (e.g., bear awareness);
- The general, activities-specific, and species-specific mitigation measures described in this WPP;
- Applicable Project conditions from regulatory approvals;
- Instruction on recording wildlife observations and monitoring of mitigation measure effectiveness; and,
- All vehicle operators (including concentrate haul operators) will be required to have specific orientation in relation to sensitive wildlife zones along the Access Road and the haul route, including zones of interaction with the winter ranges of the Finlayson, Little Rancheria, and Horseranch caribou herds, and all other mitigations related to the Access Road and haul route (Sections 5.2.1, 5.2.2, and 6.1).

This training will be an employee and contractor requirement with biennial refresher training. Continual improvement will include monitoring the implementation of the WPP, internal compliance audits, review of incident reporting, conducting frequent training sessions, and maintaining training logs for all Project personnel and contractors.

3.2.1 Employee and Contractor Conduct

The following wildlife mitigation measures will be strictly implemented:

- No hunting or fishing will be permitted by site personnel at the mine site or on the Access Road to the Robert Campbell Highway (RCH) or on BMC's other mineral tenure at any time (Appendix A). BMC will notify Yukon Government of any reported infringement of this policy;

- Harassment of wildlife will not be tolerated. This includes attempts to chase, catch, divert, follow, or otherwise harass wildlife by on or off road vehicles, aircraft, or on foot, excluding situations where diversion for human or animal safety is required;
- Personal wildlife deterrents to defend persons and property against threats from large carnivores (e.g., air horns, bear spray, bear bangers) will be issued and carried by field crews (e.g., Environmental Department personnel, geologists). These are not to be used on ungulates;
- All Project personnel and contractors must adhere to BMC's No Firearms Policy (Appendix A). Personal firearms will not be permitted at the Project site at any time. This includes the transport, storage, and use of firearms. If required, BMC will designate certain key personnel who will be authorised to use a firearm to manage dangerous human-wildlife conflicts;
- Vehicles and equipment will be appropriately maintained to minimize noise and emissions;
- Idling of site vehicles and equipment shall be minimized;
- For activities in the backcountry (i.e., away from the active Project site), field personnel must carry bear spray and functioning radios, with scheduled check-in times to ensure worker safety;
- BMC personnel and contractors will not attempt to handle nuisance or problem wildlife on their own. The site Environmental Department will be notified as soon as possible if any negative wildlife encounters occur while working at site;
- Feeding wildlife will be prohibited, including during travel to and from the Project site;
- Personal pets will not be allowed on-site;
- Recreational use of all-terrain vehicles and snowmobiles will not be permitted by any site personnel at the Project site or on BMC's other mineral tenure at any time (Appendix A);
- All aircraft service providers will be required to follow The *"Flying in Caribou Country: How to Minimize Disturbance from Aircraft"* (Government of Yukon 2010) and *"Flying in Sheep Country: How to Minimize Disturbance from Aircraft"* (Mining Environment Research Group 2006) and other industry guidelines and rules that may be published from time to time, unless weather or safety considerations dictate otherwise. These guidelines will be reviewed with all new pilots working on the Project and periodically each year;
- All work areas will be kept free of garbage and spills. All uncontained garbage or spills will be cleaned up immediately. Improperly disposed garbage, especially food or kitchen wastes, will be reported to site management and the situation rectified as soon as possible; and
- BMC personnel and contractors are required to report wildlife sightings and observations in the wildlife log and communicate wildlife incidents within 24 hours to the site Environmental Department.

3.2.2 Employee and Contractor Site Orientation

Employee and contractor site inductions (training and orientation) will be an important element of the Project management. Orientation will include the following topics in relation to wildlife management:

- Access Road use protocols;
- BMC's policies and procedures, and statutory permit/lease requirements;
- Bear awareness;

- Waste management procedures;
- Wildlife observation and interaction reporting procedures;
- Wildlife - sensitive locations and periods as applicable;
- Helicopter management practises; and
- Transportation and access management practises.

3.2.3 Training, Awareness, and Competence

All personnel will be required to attend a site induction before they are allowed to begin work which will include basic environmental training. More specialized training will be provided for personnel working in sensitive areas (i.e., near watercourses). All work areas will hold daily toolbox meetings before commencing work each day (or night) which will include a safety component and where appropriate, an environmental element. Environmental Department personnel will also conduct pre-start environmental meetings and provide toolbox training sessions when warranted by changes to task scope.

Environmental elements of toolbox meetings will emphasize:

- Conformance with procedures and requirements presented in the WPP and other applicable plans and legislation;
- The proposed work activity's actual or potential effects on the environment and mitigation measures aimed to minimize these effects;
- The potential risk and consequences of not following the appropriate procedures; and
- Spill response procedures.

Any changes to the WPP will be communicated to all Project personnel and contractors through written postings on site, during inductions, and toolbox meetings.

3.2.4 Bear Awareness Training

As a condition of employment, all Project personnel and contractors will be required to attend Bear Awareness Training as part of site orientation prior to starting work on the Project. As part of this training, the *Guidelines for Industrial Activity in Bear Country: For the Mineral Exploration, Placer Mining and Oil & Gas Industries* (Mining and Petroleum Environment Research Group 2008) and the *Proponent's Guide: Assessing and Mitigating the Risk of Human-Bear Encounters* (Government of Yukon 2012b) will be reviewed with all new Project personnel and contractors working on the Project and periodically through the field season. The training will also include an educational video, methods to reduce bear encounters, how to behave during an encounter, and Project reporting guidelines. Bear safety information and deterrents will also be made available on site to all personnel.

The training will have the following objectives:

- Differentiate between grizzly and black bears;
- Identify potential food sources and attractants for bears;
- Understand what is meant by "home range" and "personal space";

- Identify bear body language that is associated with stress levels;
- Comprehend the do's and don'ts for preventing negative bear encounters;
- Understand the differences between a bear's defensive behaviour and its aggressive behaviour and what to do in encounters and attacks;
- Minimizing bear deaths and relocations due to human-generated attractants (e.g., garbage, food, and other attractants);
- Increasing worker understanding of the negative implications of bears becoming habituated to camps for food; and
- How and when to use the different bear deterrent devices (e.g., bear spray).

3.3 SENSITIVE SEASONAL TIME WINDOWS AND HABITATS

3.3.1 Sensitive Timing Windows

Federal and territorial regulatory agencies identify several sensitive timing windows for wildlife species present within the RSA. Efforts will be made to avoid, eliminate, or minimize disturbance from Project Construction and Operation during the sensitive periods for wildlife presented in Table 3-1. Species-specific mitigations for sensitive time periods are presented in Chapter 6.

Table 3-1: Sensitive Timing Windows for Wildlife Species in the Regional Study Area

Species	Dates	Sensitivity	Reference
Caribou and Moose	January 16 – April 15	Late winter range: seasonal concentration and risk of collisions	(Farnell 2009, Adamczewski et al. 2010, Government of Yukon 2014, Russell 2018)
Caribou	May 15 – June 21 and June 22 – August 31	Calving and post calving period, respectively: sensory disturbance effects on calf survival	(Government of Yukon 2014, Russell 2018)
Caribou	September 15 – October 15	Fall rut: seasonal concentration and risk of sensory disturbance effects on reproduction	(Government of Yukon 2014, Russell 2018)
Raptors	April 1 – August 15	Nesting period: effects of sensory disturbance on reproductive success	(EDI Environmental Dynamics Inc. 2011, McIntyre and Schmidt 2012, Hayes and Reid 2014)
Migrating Birds	Annually variable: mid-April to early June and late August to late September	Migration: Effects of sensory disturbance on energy reserves	(Sinclair et al. 2003)
Breeding Birds	May 5 – August 21	Nesting period: Effects of sensory disturbance on reproductive success and incidental take	Zone B8 - General nesting periods of migratory birds in Canada (Environment and Climate Change Canada 2023)
Bears	October 15 – May 15	Denning period: Effects of sensory disturbance on energy reserves, reproductive success, and survival including incidental take	(Yukon Energy Mines and Resources 2014, Yukon Grizzly Bear Conservation and Management Plan Working Group 2019)

3.3.2 Sensitive Seasonal Habitats

Most potential interactions between the Project and sensitive seasonal habitats are relevant to caribou, and to a lesser degree moose, seasonal habitats. Baseline studies for the Project are ongoing and include several studies initiated by BMC to fulfill its obligations under Term 11b of the Project's Decision Document (Section 1.5.3.4). This term requires BMC to complete two years of additional baseline data collection on caribou habitat, distribution, and movement to inform the development of several plans including the WPP, Caribou Effects Monitoring and Mitigation Program, and the Adaptive Management Plan.

While the data analyses of some desktop studies are ongoing, the results from most field studies will be available for analysis by early summer 2024. Once the scope of the additional studies is complete, BMC will review this WPP and update it where required. For example, seasonal habitat models for caribou developed for the Project assessment will be updated using the full baseline dataset from 2015 to 2024 to accurately identify high value seasonal habitats. Further, early winter and spring movement corridors will be delineated based on the results of the intensive caribou surveys. The results of these studies will be used to improve the

development of mitigations measures presented in this WPP and will replace most of the information presented in this section of the WPP.

In the meantime, this section relies on the sensitive seasonal habitat information available through the Yukon Government's Wildlife Key Area (WKA) Inventory Program (Government of Yukon 2014). The program consists of a digital database system that catalogues habitat locations important to wildlife populations, primarily harvested species, known as key areas. WKAs are geographical locations used by a relatively large number of individuals within a wildlife population for critical and/or seasonal life functions. Many species use key areas traditionally and predictably while others use them occasionally when required by environmental factors.

Wildlife surveys and locations from collared individuals are the primary source of data for delineating the boundaries of seasonal distribution and key areas. However, other sources of information include local knowledge, anecdotal information, and historical literature and maps. An important consideration is that, although the WKA Inventory Program uses animal observations to delineate the boundaries of key habitat areas, it does not generally include an evaluation of habitat suitability for any given wildlife species. Therefore, WKAs often over represent the extent of available key habitats except in cases where key areas were refined post-hoc based on inferences about the extent of suitability of nearby habitats. Further, key areas are not weighted by the number of individuals using the area or part of the area which often leads to an over-representation of "key" habitats (i.e., a WKA based on the location of a small number of animals is weighed the same as one based on many animals).

A review of the WKA Inventory Program database was completed to evaluate whether any wildlife key habitats overlap with the Project Area (infrastructure and Access Road) or if any key areas found in the RSA have implications for the Project. Environment Yukon identifies several WKAs of regional significance in the RSA as part of their Wildlife Key Area Program (Government of Yukon 2014). The extent of these key areas is presented on Figure 3-1 and details on species and seasonal life functions for each key area are presented in Table 3-2. Only two interact directly with the Project, a moose winter range WKA (WKA # 4694) which intersects part of the Access Road and one of the FCH's core fall rut range WKA (WKA # 3889) which overlaps with the full extent of the Project infrastructure and intersects part of the Access Road.

Design and control (Chapter 4), activity specific (Chapter 5), and species specific (e.g., Sections 6.1 and 6.8) mitigation measures are expected to provide adequate protection for important seasonal habitats.

Table 3-2: Species, Season, and Function of Wildlife Key Areas in the Project's Regional Study Area¹

Species	Season	WKA ID	Location	Function	Biological Values	Project Interaction	Source
Moose	Late-Winter (February-Apr)	4692	Finlayson lake	Late-winter range	3 moose (March 1994)	N/A	Survey
Moose	Late-Winter (February-April)	4694	Finlayson River	Late-winter range	80 moose (March 1994)	Access Road	Survey
Woodland Caribou	Fall Rut (August to October)	3885	Finlayson Lake	Breeding	Finlayson Caribou Herd	N/A	Survey
Woodland Caribou	Fall Rut (August to October)	3889	Waters Creek	Breeding	Finlayson Caribou Herd Core rut range	Project infrastructure and Access Road	Survey

Species	Season	WKA ID	Location	Function	Biological Values	Project Interaction	Source
Woodland Caribou	Winter (October-April)	2002	Money Creek	Winter range	Finlayson Caribou Herd	N/A	Survey
Woodland Caribou	Winter (October-April)	3896	Finlayson River	Winter range	Finlayson Caribou Herd	N/A	Survey
Woodland Caribou	Winter (October-April)	3899	Pelly River Basin	Winter range	Finlayson Caribou Herd Core Winter Range	N/A	Survey
Thinhorn Sheep	Winter (October-April)	1738	Grass Lakes	Winter range	–	N/A	Anecdotal
Thinhorn Sheep	Winter (October-April)	1739	Fire Lake	Winter range	–	N/A	Anecdotal
Thinhorn Sheep	Winter (October-April)	1744	North Creek	Winter range	–	N/A	Anecdotal
Thinhorn Sheep	Winter (October-April)	1745	North Lakes	Winter range	–	N/A	Anecdotal
Thinhorn Sheep	Winter (October-April)	4591	North River	Winter range	5 sheep (March 1997)	N/A	Survey
Thinhorn Sheep	Winter (October-April)	4592	North River	Winter range	3 sheep (March 1997)	N/A	Survey
Thinhorn Sheep	Spring (April-June)	1740	Fire Lake	Lambing	–	N/A	Anecdotal
Thinhorn Sheep	Spring (April-June)	1746	Money Creek	Lambing	–	N/A	Anecdotal

¹ Identified by the Wildlife Key Area Inventory Program, Environment Yukon.

3.3.3 Wildlife Habitat Features

Wildlife habitat features, such as mineral licks, den sites, and raptor nests, need to be preserved because they are often used for critical life requisites (e.g., breeding, nutrition, hibernation, or seasonal movement) and/or are areas of concentrated use by multiple animals in a small area. As such, habitat alteration or disturbance at these sites can have a disproportionately large effect on local wildlife population(s) using that feature. For example, mineral licks provide animals with essential minerals such as sodium, magnesium, and trace elements necessary for dietary and health reasons (Ayotte et al. 2006).

Except for a Golden Eagle nest site, no wildlife habitat features have been identified in the Geona Creek watershed to date. To minimize habitat loss and disturbance of wildlife using local habitat features, the following measures will be followed if any wildlife habitat features are detected:

- The location of new wildlife habitat features will be recorded and reported to the Environmental Department within 24 hours. Operations in the vicinity of the feature will be suspended until management measures are implemented;
- BMC will contact the Watson Lake Regional Biologist for information on appropriate set back distances if nests, dens or mineral licks are encountered. These site-specific features shall not be disturbed (Condition 67 – LQ00424b);

- Project activities will apply no-disturbance buffers associated with different types of habitat features and associated sensitive time periods as outlined in Table 3-3. Where this is not practicable, a site-specific management plan will be developed by a QEP to evaluate key factors necessary to implement appropriate management measures (e.g., species using the feature, level of use, seasonal timing issues);
- BMC will contact YG, Environment for detailed information on the exact location of mineral licks within the polygon on the Wildlife Key Area maps (note: mineral licks are not situated in the centre of the 5 km diameter circular polygons) and for information on techniques/methodologies related to monitoring mineral licks (Condition 68 – LQ00424b);
- Any new mineral licks found by BMC will be reported to the Watson Lake Regional Biologist (Condition 69 – LQ00424b); and,
- There are no known mineral licks within the LSA; however, a small wet mineral lick (~0.4 ha; WKA 3207) is located near the North Lakes (Government of Yukon 2014). This lick is known to be used by moose and may also be used by caribou. Any new mineral lick found within 1,000 m of Project activities will be monitored for a full annual cycle using a remote camera to document species use and seasonality of use.

Table 3-3: Recommended No-Disturbance Buffers for Wildlife Habitat Features

Wildlife Habitat Feature	No-Disturbance Buffer ^{1,2}	Mitigations and Comments
Mineral Lick	1,000 m for high disturbance activities such as drilling, blasting or earth works; 300 m for other activities	In addition to the no-disturbance buffer, the integrity of the hydrology of the site (for wet licks) and wildlife trails leading to the lick must be maintained. The shortest no-disturbance buffer distance is added to allow for low-disturbance project activities to occur (e.g., driving on project roads and trails). Following a year of annual monitoring, a site-specific management plan will be developed by a QEP to allow for Project activities in proximity to the lick when it is not being used by wildlife.
Bear Den (Active)	1,000 m for high disturbance activities such as drilling, blasting or earth works; 300 m for other activities	If an old bear den site is identified, the den does not need to be protected unless it is a rock cave because the frequency of re-use of old dens is very low. The shortest no-disturbance buffer distance is added to allow for low-disturbance project activities to occur such as driving on project roads and trails (Section 6.2).
Wolverine Den (Active)	1,000 m	Female wolverine may use dens between January and July. Outside of the denning season, Project activities may proceed but the site must be kept intact including any rock piles, downed trees, or other debris.
Wolf Den (Active)	800 m	Wolf dens may be active from April to September. Outside of the denning season, Project activities may proceed but the den site must be kept intact.
Large Stick Nests (Inactive)	N/A Leave intact	Mitigations and no disturbance buffers for active raptor nests are outlined in Section 6.3.1 and Table 6-1. Outside of the nesting season, Project activities may occur in proximity to the nest site, but care must be taken to ensure that the nest site remains intact and suitable for future use.

¹ If the recommended buffer is not feasible, a site-specific management plan for the feature will be developed by a QEP.

² Several guidelines were consulted during the development of No-Disturbance Buffers including, but not limited to, the *Yukon Forest Resources Act: Wildlife Features Standard* (Yukon Energy Mines and Resources 2014), *Guidelines for Industrial Activity in Bear Country* (Mining and Petroleum Environment Research Group 2008), *Northern Land Use Guidelines: Northwest Territories Seismic Operations* (Indian and Northern Affairs Canada 2012), *Wildlife Habitat Features Summary of Management Guidelines: Northern Interior Forest Region* (BC Ministry of Water, Land and Air Protection 2004) and *How Vulnerable are Denning Bears to Disturbance* (Linnell et al. 2000).

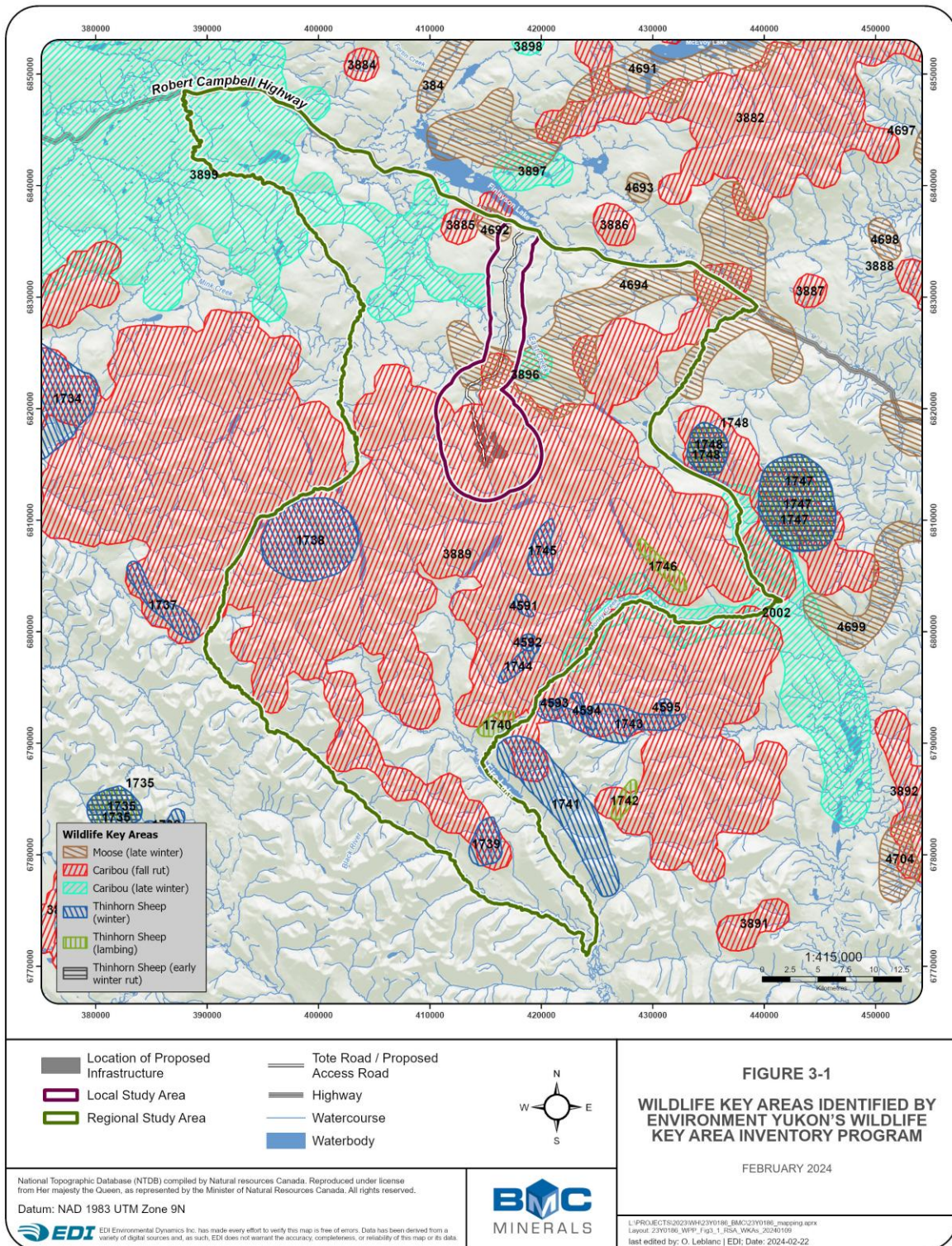


Figure 3-1: Wildlife Key Areas (WKA) identified by Environment Yukon's WKA Inventory Program

4 MINE AND INFRASTRUCTURE DESIGN AND CONTROL MEASURES

The Project infrastructure footprint has been designed to cover as little area as needed for safe operations and to minimize habitat loss and sensory disturbance. As the Project's design moves forward into the Construction and Operations phases, wildlife habitat considerations will continually be integrated into Project planning. Clearing during Construction will be kept to a minimum and will only include areas needed to construct and operate the Project safely and efficiently. In addition, the site will be progressively cleared and reclaimed, thus minimizing the total amount of vegetation cleared at any one time. During Construction and Operation, the following design and control measures will be implemented to avoid, eliminate, or minimize potential direct and indirect effects on wildlife and their habitats.

4.1 GENERAL PRACTICES

- Project personnel may not approach or harass wildlife and are expected to exercise their best judgement to prevent frightening wildlife except under rare circumstances where failure to do so could result in harm to wildlife or Project personnel;
- Control and direct surface runoff away from the construction/operations area to reduce the potential for contact water leading to contamination, sedimentation, and smothering of vegetation per the Sediment and Erosion Control Plan (BMC 2026a);
- Machinery and personnel are required to remain within the defined Project Area and along defined roads;
- If work is required in the backcountry, personnel are expected to minimize disturbance (i.e., no littering, retain natural vegetation, address all spills immediately, shut off equipment/vehicles when not in use), record all wildlife observations, and report all wildlife incidents to the Environmental Department within 24 hours;
- All heavy equipment and machinery is to be appropriately maintained and any emission control systems are to be functional including but not limited to muffler, exhaust system baffles, and engine covers;
- To prevent the spread of invasive plants, all heavy equipment and vehicles will be clean and free of seed and plant material prior to entering the Project Area (Condition 31 – LQ00424b) and will be cleaned prior to leaving it;
- Vehicle and equipment maintenance program will be implemented to minimize noise, emissions, and reduce the frequency of spills; and,
- Discourage and limit on site vehicle and equipment idling.

4.2 ACCESS ROAD

The Tote Road will be upgraded into an Access Road prior to mine and infrastructure construction to accommodate increased traffic including transport vehicles. Parts of the road will be expanded to include pull out areas to facilitate two-way traffic and safe passing. Road maintenance equipment, concentrate haulage trucks, freight trucks, and personnel transport vehicles will be the primary source of traffic on the Access Road.

The following design and control procedures will be implemented:

- The road upgrade will reduce blind spots and the potential for wildlife collisions;

- The maximum speed limit along the Access Road is 50 km/hour for daytime travel (reduced during night-time or hazardous weather conditions) and 20 km/hour at the Finlayson Bridge crossing. The speed limit on the haul road between the open pit and process plant will be 30 km/hour. Project personnel must reduce driving speeds further at night and under adverse weather and road conditions;
- Visible markers will be installed every kilometre, in both directions of travel, to allow road users to identify and report their locations while driving and the location of any wildlife observations, or other hazards. Drivers are required to use two-way radios along the Access Road and other roads to call their location at appropriate landmarks and intervals along roads;
- Regular vehicle and equipment maintenance will be conducted to minimize noise, emissions, and spills. Any spills on roadways will be managed according to the procedures described in the Spill Contingency Plan (BMC, 2026b);
- Equipment laydown areas will be minimized and will preferentially utilise the pullout areas. Where this is not practical due to a logistic, engineering design, or other reason, laydown areas will be >100 m from known wildlife trails or wildlife road crossings where possible, but at minimum this spatial buffer will apply for all high use wildlife trails;
 - Where this is not possible, a site-specific management plan will be developed by a QEP to develop site-specific spatial and temporal buffers to mitigate potential effects on the use of wildlife trails while taking into consideration the level of animal use of the trail and Project operational requirements; and,
 - The level of animal use will be classified as High, Moderate, or Low based on the following criteria. At High use trails, >80% of the trail surface is exposed soil, where vegetation has been worn away by animal traffic, and the trail surface is depressed or rutted due to extensive animal use. Moderate trails will consist of 20-80% exposed soil but rutting into the soil is generally minimal. Low use trails will typically be characterized by trampled vegetation with <20% of the trail surface being exposed soil. The level of use may be adjusted based on the results of the wildlife movement monitoring program for the wildlife trails that are monitored as part of that study; however, it is important to note that wildlife movement patterns may change over time and that the level of evidence of use at each trail, although not species specific, may be a better representation of long-term movement patterns.
- The use of all on-road and off-road vehicles will be restricted to established roads and designated trails except to access monitoring sites and remote communications equipment (Schedule 2, Clause 1.1 (iii) – Lease Agreement 105G07-001); and,
- Use of private and recreational vehicles on site is prohibited at all times (Schedule 2, Clause 1.1 (iii) – Lease Agreement 105G07-001).

4.2.1 Gatehouse

Facilitated harvest through increased public access within the winter range of the FCH was identified as a major concern by YG and RRDC (Cominco Ltd. 1996). Therefore, a security station and gate (the gatehouse) at the access point to the Access Road from the Robert Campbell Highway has been seasonally operated (typically spring through late fall) and controlled by the Project owners since 1995. Since 1996, the Project owners have employed a member(s) of the Ross River community to operate the gatehouse. Only authorized vehicles are allowed on the Access Road in accordance with its lease conditions.

The gatehouse at km 0.2 of the Access Road will be staffed and operated 24/7 during the Construction, Operation, and Closure phases. BMC will maintain the gate and gatehouse installed on the mine access road within the boundaries of the Access Road land lease (Clause 49 – Lease Agreement 105G07-001). 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 from late May through October. Following reclamation and final closure, the gatehouse facilities will be removed.

The Access Road is a private road and the gatehouse attendant will maintain an access log of all vehicles entering the Project Area. Hunters and other unauthorized vehicles will be restricted from accessing the Project Area. The Land Management Branch of the Department of Energy, Mines and Resource will be contacted if any conflicts occur over access, in accordance with the lease conditions. BMC will report in writing to Yukon each instance of unauthorized use of the Access Road within one month of the instance becoming known to BMC (Clause 53 – Lease Agreement 105G07-001).

Signage will be placed at the entrance of the Access Road to inform drivers of road safety measures and driver responsibilities including:

- Public access restriction;
- Warning of narrow road and large vehicle use;
- Functional two-way radio requirement with channel frequencies;
- List of road use conditions including running headlights, maximum speed limit, wildlife crossing zones, observing signage; and,
- Requirements to document wildlife sighting/incidents on the wildlife observation cards and wildlife incident forms. Both forms are presented in Appendix C.

The gatehouse attendant will notify drivers of seasonal environmental conditions (i.e., caribou migrations) and road conditions when they sign in at the gate.

4.2.2 Road Maintenance

Road maintenance will use strategies that minimize interactions and reduce barriers to wildlife allowing them safe passage across Project roads. The following measures will be implemented to increase wildlife safety along the Access Road and other Project roads:

- Vegetation along roads will be brushed to reduce browse and forage availability for wildlife, and to improve visibility. Vegetation clearing will be scheduled to avoid the bird breeding season (Section 6.3);
- Debris, such as fallen trees, will be removed from roadways and the right of ways to maintain open sight lines;
- Fugitive dust will be controlled using water sprays or an approved dust suppressant (environmentally-sound that does not contain salts that would attract wildlife) to minimize the Project's zone of influence on the surrounding landscape;
- Where embankments are necessary, road crews will grade to a low slope (1:5) to prevent the road from acting as a barrier to wildlife movement. Surfaces will be smooth, compact, and constructed with finer fill (<100 mm) to avoid leg entrapment;

- Native seed mixtures (Table 4-1) will be used along roadsides to prevent erosion. Seed mixtures will contain minimal attractive/palatable vegetation to bears and ungulates (e.g., legumes);
- In winter, measures will also include:
 - 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 on both sides of the road at known wildlife trail crossings;
 - Gravel and/or sand will be used on compacted snow or ice to improve traction and road safety. Salt will not be used as it is a wildlife attractant; and,
 - Snow plowing of the Access and other Project roads will be limited to only those required for current operations, maintenance, and/or emergency access.

4.3 SITE CLEARING

The Project infrastructure footprint has been minimized through design, whereby the entire mine site footprint (i.e., open pit, stockpiles, storage facilities, water management ponds, roads, and trails etc.) is confined to the Geona Creek Valley; thus avoiding the need for clearing other areas outside of the valley. Additional mitigations will include the following considerations for wildlife habitats:

- High value wildlife habitat features (e.g., raptor nest sites), sensitive wildlife habitats, and rare or sensitive ecosystem types (e.g., wetlands) were identified within the LSA during Project baseline studies such as the Ecological Landcover Classification mapping, wildlife surveys, and development of habitat models. These will be clearly identified on the detailed design and constructions plans;
- Previously disturbed areas including the existing camp roads, and trails will be used, to reduce the amount of new land clearing for the Project;
- To the extent possible given competing environmental protection priorities and operational requirements, land clearing activities will be scheduled to occur outside of sensitive timing windows for focal species to minimize the risk of incidental take and sensory disturbance (Section 3.3.1).
- Clearing of the Overburden Stockpile, Class A, B, and C Storage Facilities will be progressive, to minimize the total area of disturbance at any given time;
- Trail routes must be reconnoitered and must be used in a way that minimizes ground disturbance, including damage to permafrost and sensitive wildlife habitat (Condition 59 – LQ00424b);
- For exploration activities outside the Project Area, where the construction of trails cannot be avoided, BMC will construct trails as narrow as possible and avoid straight lines where possible. This will limit use of trails as 'wolf highways' which can increase predation of ungulates by wolves (Condition 64 – LQ00424b);
- All areas disturbed during an exploration program must be re-sloped, contoured or otherwise stabilized to prevent long-term soil erosion, slumping and subsidence (Condition 23 – LQ00424b);
- If the vegetative mat must be removed to carry out exploration activities, it must be removed so as to protect the seed and root stock contained within the mat and be stored separately from other overburden or bedrock removed for use in re-establishing the vegetative mat when the exploration program ceases (Condition 16 – LQ00424b);
- Cut brush must not be piled so that it blocks movement of wildlife or people (Condition 45 – LQ00424b);

- Land clearing will avoid disturbance to riparian vegetation wherever possible (not including the Upper and Lower Water Management Ponds, Pit Rim Pond and Fault Creek diversion) and, if required out of necessity (e.g., to improve sightlines along the stie roads to minimize the risk of vehicle and wildlife collisions), riparian vegetation will only be cut to ground level so as not to damage rootstock, promote rapid regeneration, and prevent erosion (Condition 17 – LQ00424b);
- The diversion of Fault Creek during construction and at closure will be scheduled to minimize fluctuations during nesting periods as much as practicable, ideally during the late fall or through the winter; and,
- Other than at the site of the ABM open pit and construction of water management infrastructure, protective buffer zones around riparian areas will be established to prevent sedimentation of aquatic ecosystems and to minimize sensory disturbance in movement corridors. The radius width of protective buffers will be 30 m (100 feet) adjacent to fish bearing water bodies and 15 m adjacent to non-fish bearing water bodies (Yukon Energy Mines and Resources 2011).

The amount of land cleared each year will be reported as part of the annual reporting requirements under the QML.

4.4 WILDLIFE ACCESS CONTROLS

- Electric fencing will be installed around both the camp (sleeping quarters, wash facilities, and kitchen facilities) and the Waste Management Facility (waste storage, incinerator, and fuels for the incinerator) to prevent entry to the site by bears (and other large wildlife), and to minimize the risk of human-bear conflict and habituation (Condition 73 – LQ00424b; Schedule 2, Clause 4.4 – Lease Agreement 105G07-001);
- Measures will be consistent with *Reducing Wildlife Conflict with Electric Fencing: A Beginner's Guide* (Government of Yukon 2018) and *Guidelines for Industrial Activity in Bear Country for the Mineral Exploration, Placer Mining, and Oil & Gas Industries* (Mining and Petroleum Environment Research Group 2008) (Condition 73 – LQ00424b);
- Bear activity will be closely monitored and, if necessary, electric fencing will be installed around other facilities or infrastructure (Condition 73 – LQ00424b);
- BMC will notify Conservation Officer Services if any bears or other large carnivores are repeatedly frequenting the Project Area and request advice on further mitigation measures (Condition 73 – LQ00424b);
- The electric fencing will be dismantled if any mine closures are required to prevent wildlife entanglement.
- Ancillary facilities including the Waste Management Facility, Upper and Lower Water Management Ponds, and all water collection ponds with engineered liners will be surrounded by wildlife fences. Egress ramps will be installed at all high-density polyethylene lined facilities to allow wildlife to escape should wildlife fences fail to prevent wildlife access;
- Fencing will be designed to avoid harming or entangling wildlife (i.e., including small mesh size);
- Upon closure, the haul road will be left in the pit to facilitate wildlife exiting the ABM lake in case of accidental entry;
- Wildlife will be monitored at all operating areas, particularly areas where animals may become entrapped (e.g., water management and collection ponds, open buildings); and,

- Open trenches will be sloped at one end to avoid entrapment of wildlife. Trenches and test pits will be backfilled when they are no longer needed.

4.5 PROGRESSIVE RECLAMATION

Progressive reclamation of disturbed areas will be conducted throughout the life of the Project:

- Reclamation will be progressive in nature where possible and completed before expiry of the approval (Condition 76 – LQ00424b);
- The Class A Storage Facility will be progressively reclaimed to minimize total area of disturbance at any given time;
- BMC will implement progressive reclamation plans with the objective of minimizing the impacts and duration of habitat loss associated with disturbed areas that are no longer required for Mine-related activities (Schedule 2, Clause 4.5 – Lease Agreement 105G07-001);
- If adequate seed or root stock is not naturally available, re-seeding or transplanting vegetation will be required. Only non-invasive species will be used for re-seeding or transplanting. If seeding is required, BMC will contact Government of Yukon, Compliance, Monitoring and Inspections for further information on appropriate seed mixes or collection of local seed (Condition 20 – LQ00424b). Table 4-1 presents the dry area and wet area mixes that have been used to date. These mixes may be amended from time to time in consultation with YG;
- Areas near roads will be re-vegetated with non-palatable plants to avoid attracting wildlife;
- Revegetation will be ongoing throughout the duration of the Project. BMC will ensure that annual reclamation efforts are successful in re-establishing the vegetative mat and community. A variety of sloping, contouring, scarifying, and spreading of fines, silt and/or vegetative mat will prepare the ground to achieve these ends and encourage natural re-vegetation (Condition 21 – LQ00424b). Restored areas will be monitored to identify issues and to address revegetation deficiencies;
- Once work is complete and in addition to any remedial action required in relation to re-establishment of the vegetative mat, temporary trails must be blocked to prevent future vehicular access (Condition 63 – LQ00424b);
- Disturbed lands no longer required for Project related activities will be progressively reclaimed within two years of cessation of activities; and,
- BMC will report annually on the extent of surface disturbances and reclaimed areas (Schedule 2, Clause 4.5 – Lease Agreement 105G07-001).

Table 4-1: Revegetation Seed Mixtures

Dry Area Seed Mix (2015)	Dry Area Mix (2016)	Dry Area Mix (2017 and 2018)	Wet Area Seed Mix (2015 and 2016)
37% Violet Wheatgrass (<i>Elymus violaceus</i>)	37 % Slender Wheatgrass (<i>Elymus trachycaulus</i>)	37% Slender Wheatgrass	40% Violet Wheatgrass
25% Rough Fescue (<i>Festuca altaica</i>)	25% Rough Fescue	15% Ticklegrass (<i>Agrostis scabra</i>)	33% Fowl Bluegrass (<i>Poa palustris</i>)
25% Rocky Mountain Fescue (<i>festuca saximontana</i>)	25% Rocky Mountain Fescue	35% Rocky Mountain Fescue	27% Tufted Hairgrass
13% Glaucous Bluegrass (<i>Poa glauca</i>)	13% Tufted Hairgrass (<i>Deschampsia cespitosa</i>)	13% Tufted Hairgrass	

4.6 GRANULAR RESOURCES

All Project borrow areas will be developed and managed according to the requirements of applicable licenses and permits. The development of granular resource quarries and pits will include the following considerations, which were based in part on the Yukon Government's Granular Resource Management Plan (Yukon Community and Transportation Services 1996):

- A site-specific management plan will be developed for each quarry and pit. Each plan will provide an outline of the granular resource extraction and quarrying activities at the site, an assessment of potential adverse effects, site management measures and controls (e.g., drainage, dust, noise management), and closure and reclamation activities. Each plan will also incorporate strategies to avoid effects to wildlife and their habitats and site-specific mitigation measures when avoidance is not possible (including references to the relevant sections of this WPP).
 - Special attention will be given to monitoring and mitigation strategies to minimize the risk to nesting Bank Swallows (Section 6.3.2).
 - Pre-disturbance breeding bird surveys for Common Nighthawk will be conducted at sunset prior to initiating earthworks within sand and gravel quarries during the nesting period (if avoidance is not possible; Table 6-2).
- All borrow areas identified to date are adjacent to the Access Road or overlap with proposed Project infrastructure. Therefore, no additional linear features are planned to access distant sources of granular materials;
- Any new site clearing will follow the measures outlined in Section 0. The size of clearings will be kept to the minimum necessary, natural vegetation will be maintained, and the extent of the clearings will be designed to have irregular shapes to increase edge, reduce sightlines, and facilitate natural revegetation upon reclamation;
- Blasting (if any) activities will be scheduled to occur outside the most sensitive time periods for wildlife in high value wildlife habitats (Section 3.3.1).
- Assess the site for potential changes to drainage and apply erosion or sediment controls as outlined in the Sediment and Erosion Control Plan (BMC, 2026a); and,
- All equipment re-fueling and maintenance at quarries and pits will follow the measures in Section 5.1.3 and spills will be managed according to the procedures described in the Spill Contingency Plan (BMC, 2026b).

5 ACTIVITY-SPECIFIC MITIGATIONS

5.1 ATTRACTANTS MANAGEMENT

BMC is committed to managing attractants and reducing the potential for human wildlife conflicts in the Project Area. All attractants will be stored in a manner that prevents access by bears and other wildlife until properly disposed of in accordance with the Solid Waste Regulations or burned to ash by forced air and fuel fired incineration according to the Air Emissions Regulation. The following procedures and mitigation measures will be implemented to avoid or minimize the effects of attractants to prevent attracting and habituating wildlife to the Project camp and work sites.

5.1.1 Food Management

Food at the camp and around site will be managed with the following provisions:

- All Project personnel and contractors must adhere to BMC's No Feeding of Animals Policy (Appendix A);
- All food will be properly stored in containers that are inaccessible to wildlife. In camp, frozen food will be kept in freezers and fresh food kept in refrigerators to reduce odours associated with food storage;
- All food and cooking supplies will be either stored securely in metal bear-proof containers or removed from site during times when the camp is closed (Condition 74 – LQ00424b); and,
- Camp kitchens will contain stack scrubbers in the venting system to reduce cooking odours.

5.1.2 Waste Management

Waste management practices will be applied to prevent attracting wildlife to Project facilities. All personnel are required to contain food, garbage and other attractants at camp and all work sites in ways that make them unavailable to wildlife. Proper handling and disposal of food and garbage wastes is key to eliminating bear problems as 70% of all reported human-bear conflicts are due to garbage odor attraction (Mining and Petroleum Environment Research Group 2008). Waste management around site includes the following provisions:

- The Waste Management Facility will be surrounded by an electric fence (see Section 4.4);
- All attractants, including but not limited to kitchen waste, solid waste, and food, will be stored in bear-proof containers, enclosed sheds, or other similar facilities that prevents access by bears and other wildlife (Condition 33 – LQ00424b; Schedule 2, Clause 4.4 – Lease Agreement 105G07-001);
- Combustible garbage and waste will be incinerated regularly to reduce odors and prevent the accumulation of attractants in a Canadian Standards Association approved fuel-fired incinerator in accordance with the Solid Waste Regulations (Conditions 33 and 34 – LQ00424b; Condition 80 and Schedule 2, Clause 4.4 – Lease Agreement 105G07-001). Ash from the incinerator will be transported to and buried in a licenced landfill as outlined in the Waste Management Plan (BMC, 2026c) and in accordance with the Solid Waste Regulations (Condition 33 – LQ00424b; Condition 80 – Lease Agreement 105G07-001);
- The camp and kitchen areas will be kept clean, tidy, and free of refuse (Condition 32 – LQ00424b);

- All food and waste associated with lunches will be brought back from the field at the end of each work shift for proper disposal. Debris, equipment, fuel barrels, scrap metal and other waste at the work site shall be completely disposed of, so as not to attract wildlife, by removal to an authorized disposal site as often as is practicable throughout the mining season and completely at the cessation of the operation (Condition 81 – LQ00424b);
- Work sites will be subject to daily inspections by personnel to ensure waste management practices are being followed;
- All attractants will be removed from the bed of pick-up trucks at the end of each work shift and stored in bear-proof containers in approved facilities;
- Non-combustible waste (e.g., fiberglass, glass, metal) and recyclables (e.g., drink containers, batteries) will be stored in lockable bear-proof containers, enclosed sheds, or other similar facilities and periodically transported off site for disposal at a licenced landfill and/or a recycling centre (e.g., Raven Recycling in Whitehorse);
- All solid waste, including debris, equipment, barrels, drums, and scrap metal, must be safely stored on the site of the exploration program while the program is carried out and must be disposed of in accordance with the Solid Waste Regulation when the program ceases (Condition 30 – LQ00424b);
- The Waste Management Facility will be located a over 1,000 m from sleeping quarters;
- Grey water from washroom and kitchen facilities will be disposed of through the disposal system(s) including buried septic tanks and an absorption bed(s);
- Littering will be strictly prohibited. All employees and contractors will be trained in waste management procedures during site orientation and signs will be posted around the Project site reminding personnel not to litter;
- BMC will remove any flagging tape used to carry out Project activities once the activities are completed unless bio-degradable tape is utilized (Condition 77 – LQ00424b);
- All disposal bins (e.g., combustible, non-combustible, recyclables) will be clearly marked to prevent mixing of waste materials; and,
- Waste disposal or storage sites will be inspected at the frequencies outlined in the Waste Management Plan (BMC, 2026c) to ensure containment measures are working as intended. All required repairs will be conducted promptly after being identified.

5.1.3 Fuel and Other Chemical Management

Fuel management around site includes the following provisions:

- Gasoline, diesel, lubricants, oils, and other petrochemicals may act as animal attractants (particularly for bears), and will be stored in appropriate wildlife proof containers, enclosed sheds, or other similar facilities;
- All chemicals (e.g., glycols) that may be wildlife attractants will be sealed and stored on site in a building/shed to minimize the potential for attracting wildlife;
- All fueling and lubricating will occur in designated areas to control odours. Designated areas will be located >30 m from all watercourses to prevent minor spills from entering waterways;

- Vehicles must be maintained and operated to prevent spills of fuel, lubricants, coolants and oil (Condition 44 – LQ00424b). BMC will Implement a regular vehicle and equipment maintenance program to minimize noise, emissions, and prevent spills. Vehicle maintenance will be conducted in designated areas (e.g., maintenance shop). Fuel, oil, or other fluid leaks identified on Project vehicles will be repaired within 24 hrs or the Project Vehicle will be tagged-out and measures applied to contain and/or capture leaking fluids until the repair can be performed. If maintenance is required outside of designated areas (e.g., the open pit), supplies will be used to contain and clean up any grease or fluids (e.g., tarps, collection pans, absorbents); and,
- If a spill occurs, the Spill Contingency Plan (BMC, 2026b) must be immediately implemented and notice given to the 24-hour Yukon Spill Report Line. As soon as practicable, an inspector must be contacted. Whatever remedial action is required to clean-up the spill and reclaim the affected land and water must be taken (Condition 43 – LQ00424b). Because odours remain after spills have been cleaned up, all spill sites will be treated as ‘high-risk’ bear encounter areas for 48-hours after clean-up.

5.2 TRAFFIC AND ACCESS MANAGEMENT

Traffic and access will largely be managed under BMC’s Traffic Management Plan (BMC, 2026d). The objective of the Traffic Management Plan 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. The wildlife mitigations presented in this WPP are consistent with the mitigations presented in the Traffic Management Plan; and the two plans are intended to work in concert with each other.

Prior to initiation of construction activities, 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. In addition, the working group will work to implement appropriate wildlife protection measures, which may include, but are not limited to maintenance guidelines for winter, speed reduction zones, signs at crossings, radio equipped trucks, reporting of wildlife on roads. It is envisioned that this group will also correspond with the FCHOC to ensure Decision Document Condition #10 (the portion that relates to traffic) and Condition #41 is met.

5.2.1 Access Road

Company-directed activities will be managed along the Access Road to avoid wildlife mortality and reduce sensory disturbance. Appropriate wildlife protection measures will be implemented including, but not limited to: wildlife crossing decision matrix, signs at known wildlife crossings, radio communication, and reporting of wildlife on roads. Design and control measures to avoid, eliminate, or minimize direct and indirect Project effects on wildlife related to the Access Road are presented in Section 4.2. These are not repeated here to reduce redundancy throughout the WPP.

Wildlife trails intersect the Access Road at various locations (Figure 5-1), and wildlife have historically used these trails as part of local, regional, and seasonal movements. These trails often coincide with riparian corridors and easy access to Finlayson Creek. During the spring (April through May), caribou migrate from

their winter range north and northwest of the Project to their calving and post-calving range south of the Project and in the fall through early winter move back to their winter range. However, multiple wildlife species may use these trails throughout the year. Project drivers will receive orientation on the locations of high potential wildlife crossings and be instructed to be alert while driving on all Project roads and trails to avoid collisions that could cause wildlife injury or mortality. Zones along the Access Road with a higher likelihood of wildlife crossings are shown on Figure 5-1.

To minimize the risk of wildlife collisions along Project roads and potential effects to wildlife crossing or using habitats adjacent to these roads, BMC will apply the following mitigation measures for operating vehicles on all Project roads and trails:

- Wildlife will always have the right-of-way along the entire Access Road (Condition 66 – LQ00424b), within the Project Area, and on all other roads and trails. Project personnel are prohibited from encouraging wildlife to cross the road or from scaring them away from the road except under rare circumstances where failure to do so could result in harm to wildlife or Project personnel;
- Vehicle operators will apply the wildlife crossing decision matrix in Figure 5-2 to allow wildlife to cross roads and trails safely;
- Drivers will not exit the vehicle to chase, catch, divert, follow, photograph, or otherwise harass wildlife;
- The location of ungulates, large carnivores, and driving hazards (e.g., dust clouds, road erosion) observed along Project roads is to be communicated to other road users using two-way radios;
- Encounters with wildlife are to be avoided. If caribou or moose are encountered on the tote/access road, the equipment and/or activity is to be halted until the wildlife has left the immediate area (Condition 66 of LQ00424b and Clause 31ii – Lease Agreement 105G07-001);
- Wildlife observations on access corridors will be recorded on wildlife observation forms and reported to the site Environmental Department and entered in a Wildlife Sighting Log (Condition 15 – LQ00424b).
- Wildlife-vehicle collisions will be reported to the Environmental Department within 24 hrs of the occurrence. Conservation Officer Services will be notified of any wildlife-vehicle collisions occurring on Project roads and trails within 24 hours of the incident;
- Wildlife-vehicle collision near misses and collisions will be investigated to identify the cause and potential remedial actions;
- If, for any reason, dead wildlife is found on Project roads and trails or near Project infrastructure, they shall be removed to avoid wildlife conflicts with scavengers, potential bear encounters, and vehicle collisions. Conservation Officer Services will be notified of any dead wildlife found in the Project Area within 24 hours;
- Wildlife crossing 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 to 30 km/h in these zones, remain alert for wildlife, and apply the wildlife crossing decision matrix;
- Minimum traffic levels will be maintained along the Access Road. When practicable, Project vehicles will travel in convoys of two or three vehicles along transportation routes to reduce periods of sensory disturbance; and,
- Project vehicles will avoid travelling on the Access Road at dusk and dawn to minimize the risk of wildlife collisions.

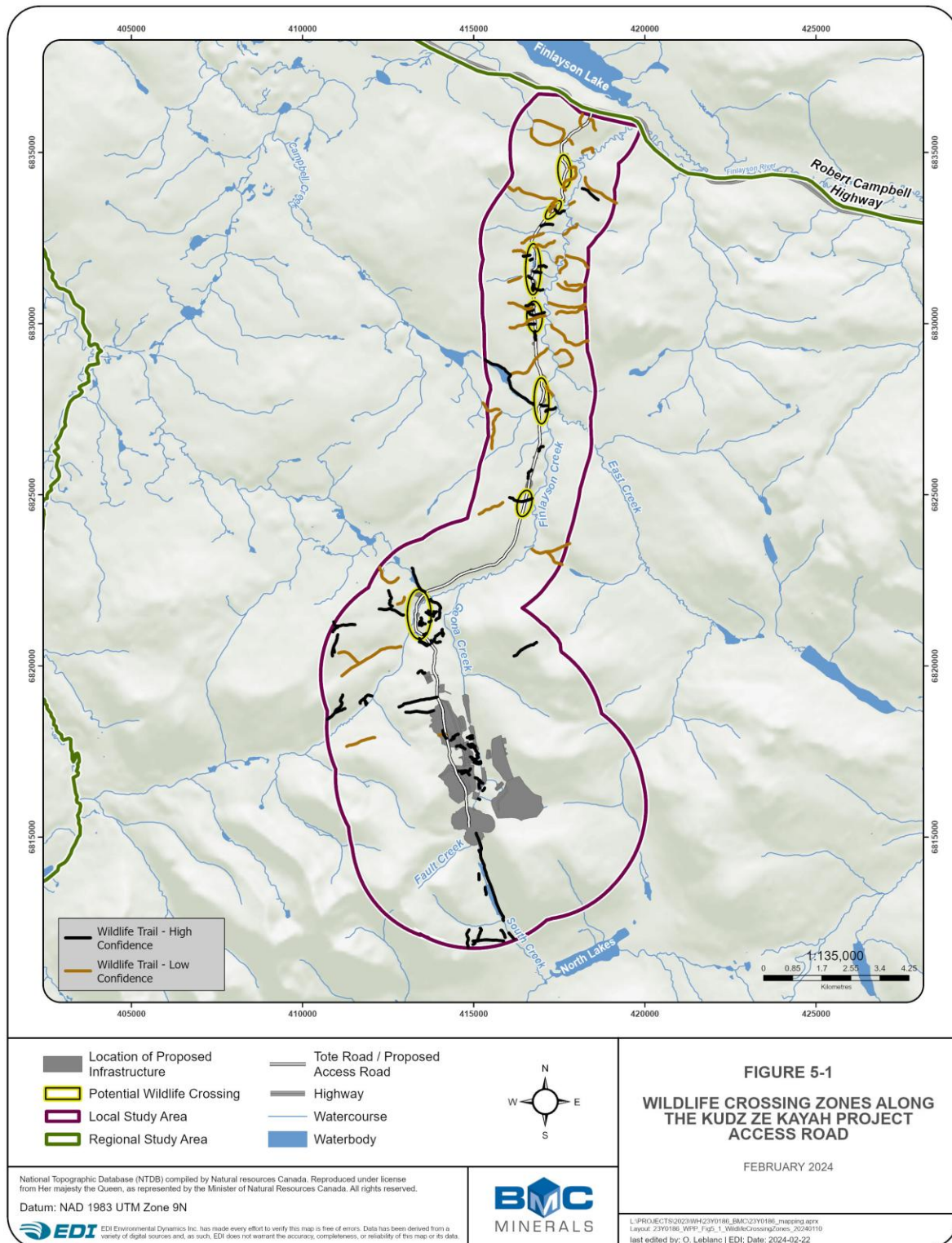


Figure 5-1: Wildlife Crossing Zones Along the Project Access Road

5.2.2 Highway Transport

Transportation contractors will be required to undertake a BMC orientation session that will include company policies and procedures aimed at protecting wildlife along the main public highway transport routes. Company-directed transport activities will be managed along the highway transportation route to avoid wildlife mortality. 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 BMC's Environmental Department and Conservation Officer Services within 24 hours;
- Wildlife near misses and collisions will be investigated by BMC's 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;
- Radios will be used to communicate sightings of large animals.
- Adhere to the wildlife crossing decision matrix in Figure 5-2 while driving on highways; and,
- All drivers will be informed on the locations of high-risk areas for large mammal-vehicle collisions on Yukon highways identified in *Large mammal-vehicle collisions: overview of mitigations and analysis of collisions in Yukon* (EDI Environmental Dynamics Inc. 2015). Drivers need to be especially alert for the presence of large ungulates (e.g., moose and caribou) in these areas. High risk times and areas for ore trucks include, but are not limited to:
 - The RCH from the Access Road junction east to the Wolverine Mine Access Road (and west to Bruce Lake) from November 15 to May 15. This area coincides with part of the FCH's winter range; and,
 - The Alaska Highway from Watson Lake to its junction with the Stewart-Cassiar Highway, and the north end of the Stewart-Cassiar Highway from October 15 to May 15 (Section 6.1.2). This area coincides with part of the winter range of the Little Rancheria and Horseranch caribou herds and was identified as a high vehicle-caribou collision zone (EDI Environmental Dynamics Inc. 2015).

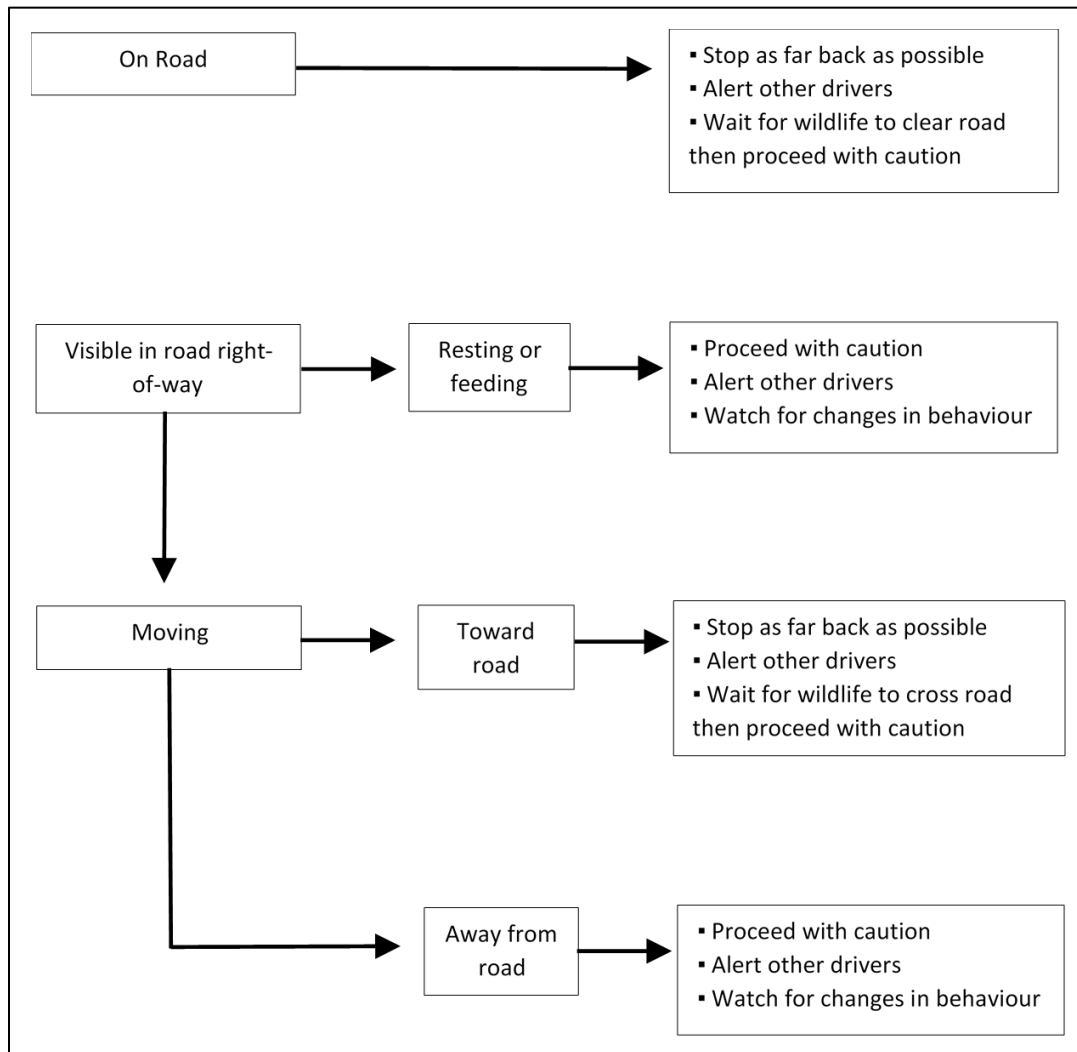


Figure 5-2: Wildlife and Road Operation Decision Matrix

5.2.3 Air Transport

Aircraft use shall be carried out to minimize non-essential flight activities and to avoid ungulate calving and rutting areas during sensitive lifecycle periods. Avoidance periods are subject to change from-time to time in accordance with results from wildlife surveys and Wildlife Log observations and consultation with the Regional Biologist (Schedule 2, Clause 4.2 – Lease Agreement 105G07-001).

5.2.3.1 Fixed-wing Aircraft Operations

The nearest airstrip servicing the Project is the Finlayson Lake Aerodrome. This 560 m (1,800 ft) airstrip is located along the RCH near Finlayson Lake (61.691462°N x -130.773875°W). It is approximately 30 km northwest of the Project site. Fixed-wing aircrafts will be used primarily for transporting personnel and some cargo from Whitehorse and other communities (e.g., Faro, Ross River) to the site during all phases of the Project.

The Finlayson Lake Aerodrome is managed and operated by the Transportation Aviation Branch of the Department of Highways and Public Works. As a public airstrip, it is not managed by BMC and is used by other parties over which BMC has no control.

The airstrip is oriented northeast to southwest. Fixed-wing aircrafts require longer approach and departure vectors from an airstrip than helicopters and therefore are less flexible in their flight procedures. Wind speed and direction will dictate from which direction the aircraft will approach the airstrip on landing and depart on take off.

The following procedures will be followed for fixed-wing aircraft flights:

- On transit flights from communities to the Finlayson Lake airstrip, fixed-wing aircrafts will maintain a cruising flight altitude between 2750 and 3050 m ASL (9,000 to 10,000 ft ASL). Flight altitude may vary based on weather conditions. Fixed-wing aircrafts flying at these altitudes are not expected to cause sensory disturbance to wildlife;
- Aircrafts will initiate a gradual descent to reach a 300 m above ground level (AGL; 1,000 ft AGL) flight altitude approximately five to six kilometers from the airstrip and rapidly descend on their final approach;
- Subject to suitable weather conditions and personnel safety, fixed-wing aircrafts will approach the airstrip for landing from the northeast to avoid flying at lower altitude over the FCH late winter range in the Pelly River lowlands from January 16 to April 15; and,
- After take off, fixed-wing aircrafts will ascend to cruising altitude as quickly as aircraft specifications, personnel safety, and weather conditions allow.

5.2.3.2 Helicopter Operations

Helicopter use will be carried out to minimize non-essential flight activities and to limit sensory disturbance for wildlife and other land users. Wherever possible, existing roads and trails will be used, but transportation by helicopter will be necessary to access part of the Project claims and to support some types of activities (e.g., geophysical surveys). Other than direct flights to community airports (e.g., Whitehorse, Ross River, Faro), most helicopter supported operations will be limited to the extent of the Project claims. Yukon Environment's *Flying in Caribou Country: How to Minimize Disturbance from Aircraft* (Government of Yukon 2010) and *Flying in Sheep Country: How to Minimize Disturbance from Aircraft* (Mining Environment Research Group 2006) documents provided guidance for reducing the effects of aircraft disturbance to wildlife. Species-specific mitigations for caribou and sheep are further described in Sections 6.1 and 6.6. Project personnel will adhere to the following mitigation measures to reduce the risk of wildlife disturbance from helicopter operations in the RSA. These flight procedures and mitigations will be followed except where required for localized Project activities or for personnel safety considerations:

- Sensitive seasonal wildlife habitats are presented in Figure 3-1. These maps will be updated periodically as new information on important wildlife habitats becomes available and provided to and reviewed with aircraft support providers;
- Flight routes will be planned to avoid known sensitive habitats during key seasonal periods (e.g., mineral licks, raptor nest sites, caribou wintering areas). When sensitive seasonal habitats cannot be avoided, a minimum flight altitude of 600 m AGL (or 2,000 ft AGL) will be maintained;
- To minimize cumulative effects over the RSA, flights to a given location will follow the same flight route and be concentrated over as short a time window as possible;

- Helicopters will maintain minimum flight altitudes of 300 m AGL (1,000 ft AGL) to minimize disturbance to wildlife;
- If flights below 300 m AGL (1,000 ft AGL) are required (e.g., geophysical surveys), flights intersecting with sensitive seasonal habitats will be scheduled outside the sensitive time windows identified in Table 3-1, especially the caribou calving, rutting, and sheep lambing seasons;
- When ungulates or large carnivores are observed, the flight route will be modified to maximize the vertical and horizontal separation distance between the aircraft and the animals. Following observations of ungulates or large carnivores, flight routes will be adjusted to avoid areas where animals were observed until they have left the area. When wildlife is observed and an evasion response is detected, aircrafts will ascend to a higher flight altitude and veer away from animals;
- Apart from wildlife surveys conducted by QEP, helicopter crews will not use helicopter supported operations as opportunities for wildlife viewing and will not intentionally approach wildlife. Any known attempts to follow, hover, or circle around wildlife will be subject to review and discipline (including the potential for dismissal) of BMC personnel or contractors involved in the incident;
- Use of unmanned aerial vehicles (UAVs) or drones is restricted to those authorized by the Site Manager and must follow restrictions on areas of use and timing that avoid adversely affecting wildlife. Personal use of UAVs or drones is prohibited; and,
- Purposefully flying towards, hovering and circling wildlife is prohibited.

5.3 ACTIVE WORK SITES

- BMC, in consultation with the Regional Biologist, will establish appropriate measures to carry out blasting activities at the mine in a manner that avoids disturbance of wildlife during critical lifecycle activities, particularly caribou calving and sheep lambing periods (Schedule 2, Clause 4.3 – Lease Agreement 105G07-001). Blasting will be restricted to the active Mine and will occur on a regular schedule, likely once at the same time each day or every second day. Minor blasting outside the Mine may be needed for construction and will be scheduled to avoid nesting periods (where practicable). Blasting will be delayed when wildlife is observed within 500 m of the blasting location;
- All reasonable efforts will be made when drilling to minimize the impact on wildlife and the public (Condition 49 – LQ00424b);
- If ungulates, bears or wolverines, are encountered while carrying out Project activities, the activities will stop, as long as it is safe to do so, until the animal(s) has left the area. Wildlife shall be given the right of way (Condition 66 – LQ00424b);
- Project personnel cannot approach or encourage wildlife to leave the vicinity of an active work site except under rare circumstances where failure to do so could result in harm to wildlife or Project personnel;
- Workers shall maintain an appropriate distance from wildlife and may only resume full activity once wildlife have left the area on their own accord; and,
- Project personnel should consult with the Environmental Department, Project Manager, or QEP for additional directions when deemed necessary.

5.4 HUMAN-WILDLIFE CONFLICT MANAGEMENT

Human-wildlife conflicts are most likely to occur with grizzly or black bears but are also possible with other wildlife species. BMC's goal is to prevent human-wildlife conflicts from occurring; however, conflicts may occur even with the effective application of all best practices and mitigation measures. As a condition of employment, Bear Awareness training will be provided to all Project personnel and contractors as part of site orientation (Section 3.2.4). Camp and field personnel will be familiar with conflict preventative measures and dealing with close range bear human encounters.

The following protocols are intended to ensure personnel safety and to minimize the risk of human-wildlife conflicts that could result in wildlife mortality:

- All Project personnel are not permitted to harass wildlife under any circumstances other than in cases of personnel safety (e.g., bear encounter requiring the use of deterrents). This includes attempts to chase, catch, divert, follow, photograph or otherwise harass wildlife, whether on foot or while operating Project vehicles (on- or off-road), heavy equipment, or aircraft;
- BMC will supply the camp with bear deterrent devices such as bear bangers, cracker shells, bear spray, etc. The bear awareness training provided to personnel and contractors will include use of these deterrent devices (Condition 72 – LQ00424b);
- All Project personnel and contractors working at remote sites will be required to always carry bear spray and a functioning radio;
- All Project personnel and contractors are required to report wildlife sightings on a wildlife observation card;
- Trained personnel will monitor, manage, and evaluate human-wildlife conflicts on site. When a human-wildlife conflict occurs, the site Environmental Department will be informed, the incident will be documented on a wildlife incident form, and the incident will be investigated. The investigation will include the date, time, details from the employee interview, scene investigation, and photographs of any evidence;
- After human-wildlife conflict events, a review of attractant management practices at the location of the incident and within the camp will be undertaken to confirm that proper practices are being followed and, if not, that corrective actions are applied;
- Warnings signs will be erected in locations where frequent dangerous wildlife sightings occur. These will be updated as necessary;
- Personnel and contractors will not attempt to handle nuisance or problem wildlife without specific direction from the Conservation Officer district office in Ross River 867-969-2202 or Watson Lake 867-536-3210 and Kaska Land Stewards;
- With approval from Conservation Officer Services, adverse conditioning actions will be used with problem wildlife as a deterrent to human habituation; and,
- Should a bear wander into the camp or an active work site, mitigation measures will initially consist of noise deterrents. This may be followed by the use of non-lethal firearm projectile deterrents if necessary to deter the bear from investigating the camp or work site and to ensure personnel safety. All use of deterrent events (e.g., air horns, bangers, bear spray, non-lethal projectiles) will be documented and reported to BMC's Environmental Department and Conservation Officer Services within 24 hours.

The initial risk and probability decision matrix, shown in Table 5-1, will be used to assess and manage human-wildlife conflicts.

Table 5-1: Decision Matrix for Managing Human-Wildlife Conflicts

Interaction	Actions and Management Response					
	Monitor	Post Warnings	Review all Relevant Attractant Management Practices and Apply Corrective Actions if Necessary	Contact Conservation Officer	Aversive Conditioning to Change Behaviour	Request Relocation or Suppression
Sighting reported but risk of interactions with humans is low based on the location (low risk)	X					
Animal behaves normally (i.e., feeding) but could come in conflict with humans (moderately low risk)	X	X				
Animal reacts defensively and could come in conflict with humans (moderate risk)	X	X	X			
Animal tolerates human disturbance, ignores people/facilities but could come in conflict with humans (moderate risk)	X	X	X	X		
Animal displays repeated active interest in people/facilities and could come in conflict with humans (moderately high risk)	X	X	X	X	X	
Animal is clearly habituated to people/facilities and could come in conflict with human (high risk)	X	X	X	X	X	X
Animal displays aggressive behaviour and is a threat to safety (high risk)		X	X	X	X	X

5.5 FACILITATED HARVEST

Access management and wildlife harvest mitigations will play a key role in reducing facilitated hunter harvest as a result of Project development:

- The gated security station at the junction of the Access Road and the RCH will be operated 24 hours per day on a year-round basis (Section 4.2.1). Hunters and other unauthorized vehicles will be restricted from accessing the Project Area;
- The effectiveness of the gate station to limit access by non-Project vehicles and off road vehicles will be monitored by Project personnel and with remote cameras deployed along the Access Road for wildlife movement monitoring program. If non-Project related use is detected, measures as required will be deployed to further limit access;
- All Project personnel and contractors must adhere to BMC's No Hunting – no Fishing Policy (Appendix A). All Project personnel are restricted from utilising their approved site access for the

purposes of hunting or fishing over the entire Project Area, including the Access Road, and other roads and trails. This applies for the full calendar year during which personnel are working or have worked on site, including days off and after completion of seasonal work activities;

- All Project personnel and contractors must adhere to BMC's No Firearms Policy (Appendix A). Personal firearms will not be permitted at the Project site at any time. This includes the transport, storage, and use of firearms. If required, only designated personnel will use a firearm to manage dangerous human-wildlife conflicts;
- Firearms are not allowed on the Project site, except with written permission of the BMC Chief Executive Officer; and,
- Information about wildlife abundance and locations are to be treated as confidential information and will not be shared outside of work requirements (e.g., wildlife sighting forms, notification of wildlife on the road while driving).

6 SPECIES-SPECIFIC MITIGATION

6.1 CARIBOU

The caribou herds that interact with the Project and the concentrate haul route are part of the northern mountain population (NMP) of woodland caribou, which are designated Special Concern by COSEWIC (COSEWIC 2014a) and listed under Schedule 1 of the federal SARA (Government of Canada 2016). Environment Canada released a management plan for the NMP of woodland caribou in 2012, with the goal of preventing their population from becoming threatened or endangered by engaging accountable agencies to responsibly manage the herds and their habitat (Environment Canada 2012).

Although they tend to use open habitats preferentially, NMP caribou occupy a variety of habitats seasonally across their range to meet specific seasonal life requisites. They undertake traditional movements between seasonal ranges as well as seasonal altitudinal changes in habitat use as a strategy to minimize predation, avoid harassment from biting insects, avoid heat stress, exploit seasonal forage resources, and avoid deep snow (Environment Yukon 2016a).

6.1.1 Finlayson Caribou Herd

Caribou in the RSA are part of the FCH. Kaska have strong cultural ties to the FCH and place a high cultural and subsistence value on this herd. Effective management of the FCH is also a key concern for the Yukon Government. The FCH has been the focus of the longest continuous monitoring and management effort of any Yukon caribou herd. The Yukon Government, sometimes in partnerships with industry (e.g., Yukon Zinc, BMC), conducted fall rut composition surveys annually from 1982 to 2015, the Finlayson Lake Predator Control Study from 1983 to 1989 (Farnell et al. 2008, Farnell 2009), as well as seven population censuses between 1986 and 2022 (Adamczewski et al. 2010, Francis et al. 2022, Russell 2022) — a management history spanning over 40 years.

The FCH has a traditional home range of 23,000 km² (the extent of the Project infrastructure, once fully developed, will be 7.1 km²). As is common to most of the NMP ecotype, the FCH is migratory and moves to different seasonal habitats within its home range along seasonal routes to meet specific life cycle needs. Available evidence on seasonal caribou movements indicates that elements of the FCH arrive in the vicinity of the Project infrastructure through the calving to post calving period, remain in the southern half of the RSA from post calving through to early winter, and migrate back to their wintering range in the Pelly River lowlands through early winter. Core seasonal distribution of the FCH is presented in Figure 6-1 (adapted from Adamczewski et al. 2010). Core seasonal distribution for the RSA will be updated using the full baseline caribou dataset from 2015 to 2024 once the scope of the additional caribou studies is completed (Section 1.5.3.4). The seasonal ranges and movements of the FCH are described in further detail in *Ungulate Baseline Report (2022-2023) Kudz Ze Kayah Project* (BMC Minerals Ltd. 2023b). All seasonal habitat and movement areas are a conservation concern for Environment Yukon.

The following mitigation measures will be applied to minimize impacts to caribou:

- Mining activity (blasting, loading, and hauling) in alpine and subalpine ecosystems will be suspended from May 15 to June 21 when caribou are present within 1 km of the ABM pit, where practicable, to minimize effects on calving caribou. Activities will resume when the caribou have left the area of their own accord.

- Project activities will be minimized during the peak rut period from September 15 to October 15 when caribou are present within 1 km of the ABM pit. Because animal locations change daily, communication with all personnel regarding the known locations of caribou will be maintained so works can be planned to avoid these locations, where practicable;
- The principles identified in the *Flying in Caribou Country: How to Minimize Disturbance from Aircraft* guidelines will be followed (Government of Yukon 2010). Flight guidelines for helicopter supported activities are summarized in Section 5.2.3.2;
- The existing terms and conditions for aircraft operations currently required under BMC's Mining Land Use Approval (LQ00424b) will continue to be followed during the Construction and Operations phases of the Project to minimize effects on caribou. These include:
 - Condition 70: "The operator shall plan to avoid carrying out their airborne geophysics program during the critical periods for caribou, which in this area is May to July for calving and post-calving and mid-September to mid-October for rutting. The operator shall conduct their airborne geophysics program during late August.";
 - Condition 71: "The operator shall plan to avoid carrying out their helicopter exploration activities during the critical periods for caribou (critical periods for this area are May to July for calving and post-calving and mid-September to mid-October for rutting.) If caribou are present within 1 km of the active work area during these times, helicopter exploration activities shall cease until the caribou have left the area.";
- When caribou are observed within 1 km of operation areas, helicopters will be required to maintain a minimum flight altitude of 600 m during the calving (May 15 to June 21), post-calving (June 22 to August 31), and rutting (September 1 to October 31) seasons;
- Subject to suitable weather conditions and safety considerations, fixed wing flight paths to and from the Finlayson airstrip will be adapted and closely managed from January 16 to April 15 to minimize effects to caribou (Sections 5.2.3); and,
- Following refinements of the caribou seasonal habitat models, helicopter flights paths will be developed by a QEP in partnership with aircraft support providers to avoid important seasonal habitats. These will be shared with all aircraft support providers and reviewed with all new pilots working on the Project.

A summary of the key seasonal mitigation measures to minimize Project effects to the FCH are presented in Figure 6-2.

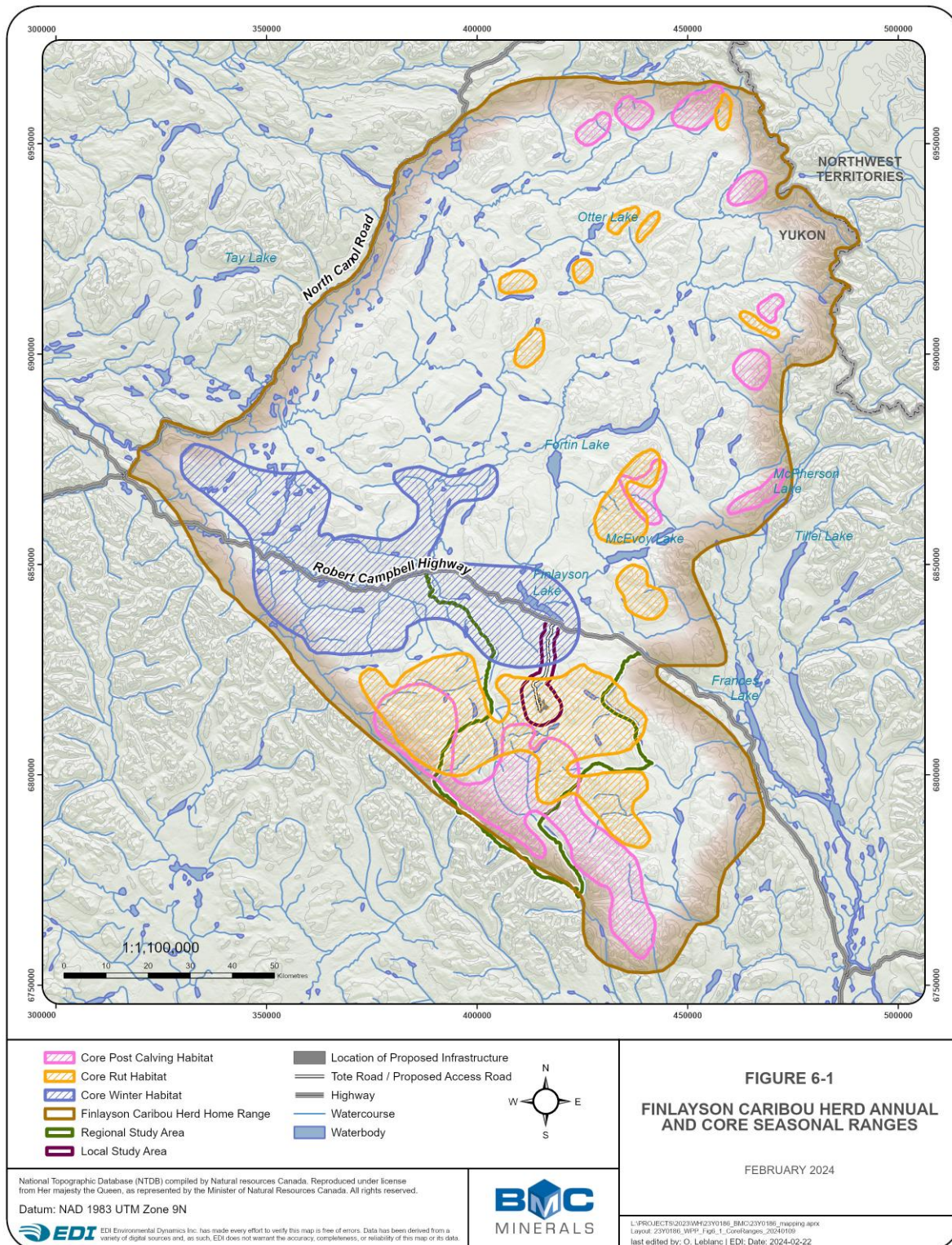


Figure 6-1: Finlayson Caribou Herd Seasonal Distribution and Habitat Ranges

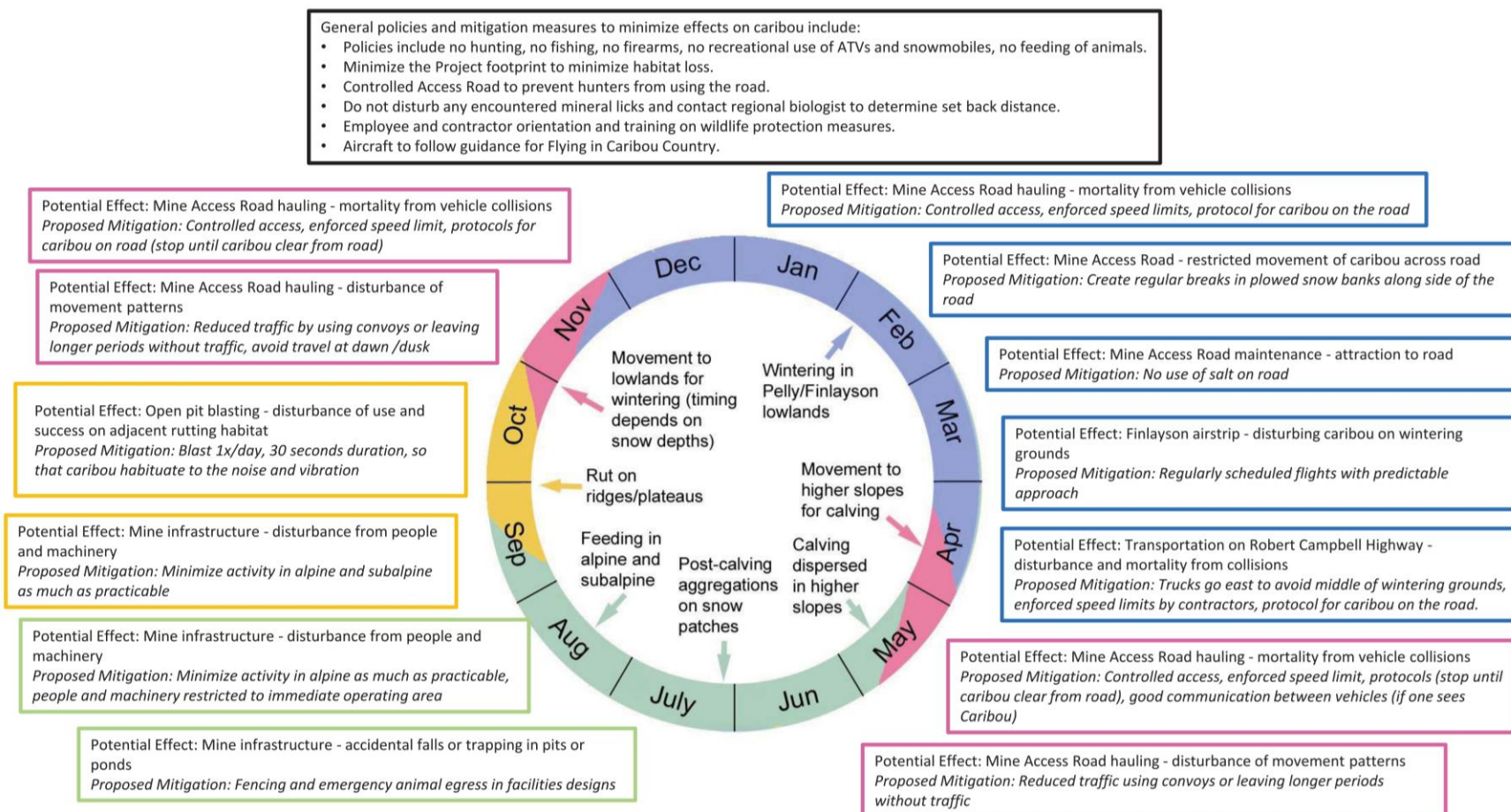


Figure 6-2: Kudz Ze Kayah Project – Key Mitigation Measures to Protect the Finlayson Caribou Herd

6.1.2 Little Rancheria and Horseranch Caribou Herds

In winter, caribou from the Little Rancheria and Horseranch caribou herds congregate at low elevations through the lichen rich mature conifer forests of the Liard River Basin (Florkiewicz et al. 2004). The concentrate haulage route intersects the winter range of these herds along the Alaska Highway from Watson Lake to its junction with the Stewart-Cassiar Highway and through the northern section of the Stewart-Cassiar Highway in Yukon and northern British Columbia (Figure 6-3).

The combination of highway traffic volume on the Alaska Highway, high density of caribou and moose where the highway intersects winter ranges, and the use of salt (i.e., an ungulate attractant) to improve traction and road safety resulted in several zones of high vehicle-ungulate collisions from the British Columbia border near Watson Lake to Whitehorse (EDI Environmental Dynamics Inc. 2015). The portion of the haul route from Watson Lake to the Stewart-Cassia Highway was identified as a high vehicle collision zone for caribou annually from October 15 to May 15 (Figure 6-3) (EDI Environmental Dynamics Inc. 2015).

Mitigation measures are already in place in high collision areas on Yukon highways including cautionary and awareness signage at the east and west boundaries of high caribou collision incidence zones (EDI Environmental Dynamics Inc. 2015). Signage and driver education campaigns improvements have been ongoing through the efforts of the Yukon Government's *Preventing Wildlife Collisions Interdepartmental Working Group* following the release of the report *Large mammal-vehicle collisions: overview of mitigations and analysis of collisions in Yukon* (EDI Environmental Dynamics Inc. 2015). Transport contractors will review this report and receive further orientation on the locations of high-risk collision areas and mitigation measures aimed at minimizing the risk of collisions (Section 5.2.2).

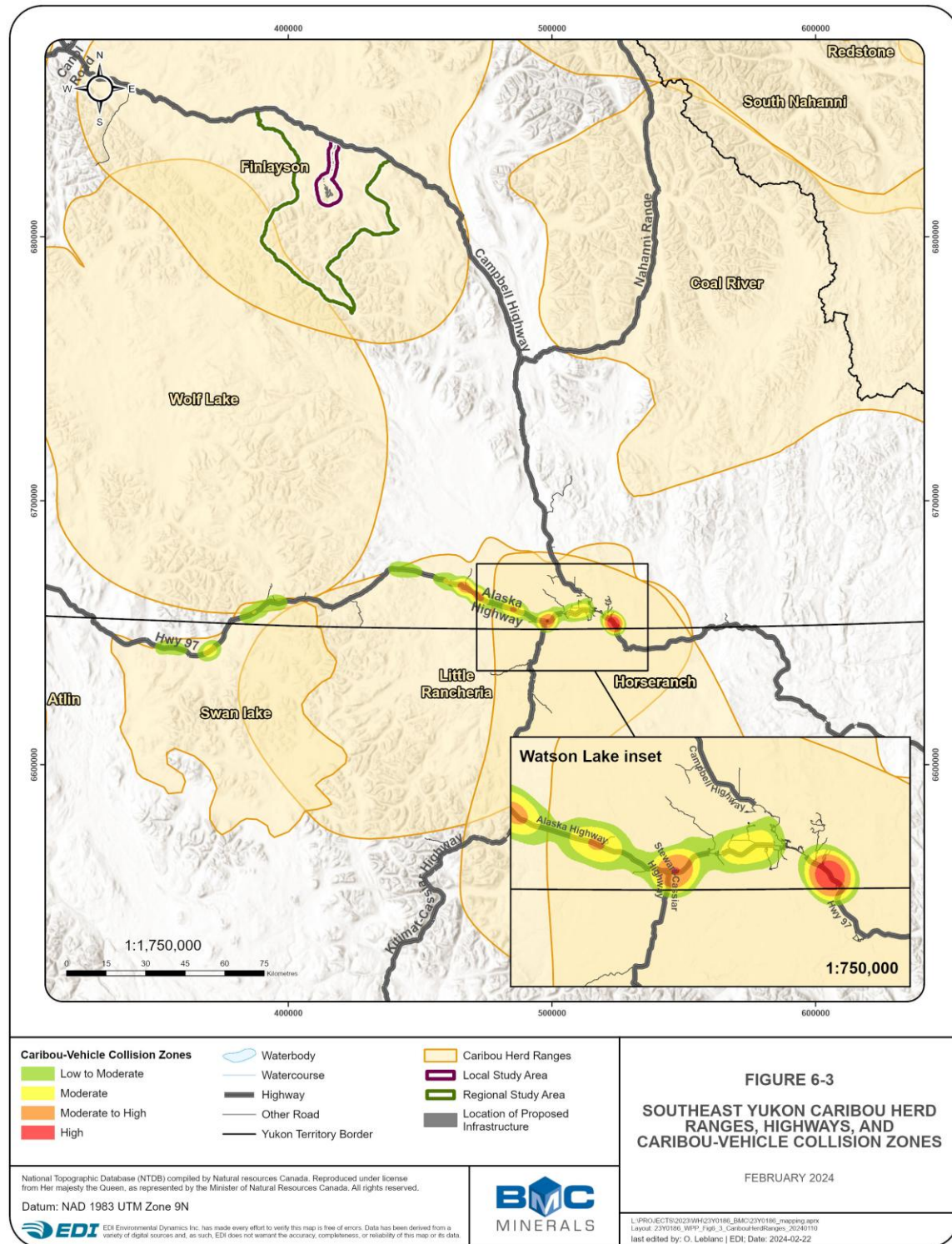


Figure 6-3: Southeast Yukon Caribou Herd Ranges, Highways, and Caribou-Vehicle Collision Zones

6.2 GRIZZLY BEAR AND BLACK BEAR

Both grizzly and black bears occur in the Project Area. Grizzly bears are designated Special Concern under Schedule 1 of the SARA (Government of Canada 2016) and are ecologically and culturally important. The Yukon Government and its partners developed a conservation management plan for grizzly bears in the Yukon Territory (Yukon Grizzly Bear Conservation and Management Plan Working Group 2019).

Hibernation is a key aspect of grizzly bear life history and ecology. It is essential for conserving energy and reducing metabolic costs during periods of scarce food resources and unfavourable weather. There is substantial variation in the phenology and chronology of denning within and between grizzly bear populations, which depends on the weather (Pigeon et al. 2016), latitude (Fowler et al. 2019), and physical attributes of the bears, such as fat reserves, sex, and reproductive status (Pigeon et al. 2016). In general, grizzly bears tend to enter their dens between mid-October and late November and emerge from their dens between mid-April and mid-May (Miller et al. 1982, McLoughlin et al. 2002, EDI Environmental Dynamics Inc. 2018). Disturbance of hibernating grizzly bears has been documented to reduce females' reproductive success (Swenson et al. 1997), and den abandonment has been linked to a greater probability of death for dependent offspring (Linnell et al. 2000). This is especially true of bears near (≤ 1 to 2 km) road development (Linnell et al. 2000).

To date, only two grizzly bear dens have been identified during Project baseline studies (Alexco Environmental Group 2016). Both dens were over 4 km from the Project infrastructure and no dens were observed within the Project LSA.

Project activities have the potential to affect bears via habitat alteration, displacement due to disturbance, disturbance to denning bears, and potential human-bear conflicts that can lead to bear or human mortality. BMC considers managing the risk of human-bear conflict a top priority and has been successfully doing so since January 2015. Mitigation measures to minimize human-bear interactions and reduce conflicts are also presented in other sections of this WPP including bear awareness training (Section 3.2.4), wildlife access controls (Section 4.4), attractants management (Section 5.1), and human-wildlife conflict management (Section 5.4). To reduce redundancy through this WPP, mitigations presented in other sections are not repeated here.

To prevent potential mortality and sensory disturbance to denning bears, a QEP will conduct pre-disturbance grizzly bear den surveys within a 2 km radius buffer of planned winter and early spring work areas (i.e., areas where blasting, drilling or earthwork are planned). Additional details on the protocol for pre-disturbance bear dens surveys are provided in Appendix D. If any active bear dens are located:

- If denning activities are identified, BMC will consult with the YG Conservation Officer and Kaska to determine the mitigation measures to prevent disturbance to denning bears. No site personnel are permitted to harass a bear to prevent it from denning near the Project.
- To prevent potential mortality and sensory disturbance to denning bears, active dens will be protected by a 1,000 m no-disturbance buffer for high disturbance activities such as drilling, blasting, and earthworks and a 300 m buffer for other activities. The shortest no-disturbance buffer distance is added to allow for low-disturbance Project activities to occur (e.g., driving on project roads and trails).
- Following the implementation of the two bullet above, a site-specific management plan will then be developed by a QEP for all active bear dens to develop site-specific spatial buffers and timing guidelines and mitigate potential effects of the Project on denning bears while taking into consideration Project

operational requirements. Development of a site-specific management plan for grizzly bear dens will include:

- Initial site assessment, including a field assessment if required;
 - Specific actions to mitigate Project effects for the den including the development of site-specific spatial buffers and timing guidelines. Site-specific spatial buffers will remain in place until spring den emergence is confirmed;
 - An ecological and operational rationale for the proposed management strategy;
 - A monitoring protocol to assess compliance and specific options to adjust management actions based on compliance records; and,
 - Documentation of the outcome of the management strategy and integration of the results into future operational practices.
- Old bear dens dug into soils are rarely reused and do not need to be protected after spring emergence. However, rock caves can be reused for denning over multiple years and any rock caves with evidence of bear use will be assessed by a QEP annually.

6.3 BIRDS

The *Migratory Birds Convention Act* (Government of Canada 1994) and its regulations provide protection for migratory birds, their eggs and nests, their habitats, and regulate the hunting of migratory game birds. The Act and its regulations prohibit the incidental take (unintentional destruction) and other activities that may cause harm to migratory birds, their eggs, or active nests. Some groups of species not protected under the *Migratory Birds Convention Act* such as raptors, corvids, and grouse are protected in a similar manner under the Yukon's *Wildlife Act* (Government of Yukon 2002b) and Wildlife Regulation (Government of Yukon 2012a). Species at risk are also afforded additional protections under the SARA (Environment and Climate Change Canada 2022). BMC is committed to adhering to federal and territorial legislations to protect breeding birds, their nests, and eggs anywhere they are found on the Project, including previously disturbed areas.

The Migratory Bird Regulations protect migratory birds, their eggs and their nests, by prohibiting activities that can cause them harm (Government of Canada 2022). Unless a person has a permit, or the regulations authorize them to do so, they are prohibited from doing the following activities:

- capture, kill, take, injure or harass a migratory bird or attempt to do so;
- destroy, take or disturb an egg;
- damage, destroy, remove or disturb a nest, nest shelter, eider duck shelter or duck box, unless the following exceptions apply:
 - the nest does not contain a live migratory bird or a viable egg; and
 - the nest was not built by a species that is listed in Schedule 1. The nests of species listed in Schedule 1 are protected at all times or until a notification of the unoccupied nest has been submitted through the Abandoned Nest Registry (<https://www.permis-permits.ec.gc.ca/en/AbandonedNests>).

The Project Area intersects bird nesting zone B8 of the Bird Conservation Region 4 (BCR4) – Northwestern Interior Forest (Environment and Climate Change Canada 2023). The breeding bird season for Zone B8 is as follows:

- Wetland ecosystems: 10 May to 10 August;
- Open ecosystems: 5 May to 21 August; and,
- Forest ecosystems: 5 May 13 August.

The bird nesting window for Zone B8 considers extremes in variability in the initiation and termination of the bird breeding season. However, it is important to note that nesting periods may vary further annually due to climatic and site-specific conditions and that birds may start nesting earlier or later than the dates provided above if conditions are favourable or unfavourable, respectively. Environmental Department personnel will be vigilant for the first signs of nesting behaviour and the application of avoidance or mitigation measures will be adapted to when birds are first found nesting in the Project Area.

The primary protection mechanism for breeding birds within the Project Area will be to plan clearing activities in advance and conduct land and vegetation clearing activities outside the breeding bird season. By doing so, scheduled works will avoid most risks of harm, harassment, or accidental take of nesting birds and/or their eggs.

However, this may not be always operationally feasible given the scope of mine development and multiple competing priorities including other environmental protection considerations. If clearing activities are required during the nesting period, BMC will plan for the clearing to be scheduled to coincide with the front and back end of the nesting period when the risk of incidental take is minimal. The feasibility of this planning will depend on the extent of the area needing clearing. In all cases when land and vegetation clearing activities cannot avoid the breeding bird season, a QEP or an experienced observer under the supervision of a QEP will conduct pre-disturbance breeding bird surveys. An “experienced observer” is defined as an individual experienced in conducting breeding bird surveys by sight and sound and with extensive knowledge of the breeding bird assemblages present in the relevant ecosystems. The purpose of these surveys is to detect the presence of breeding birds, and potentially their nests, within and in the vicinity of the affected areas prior to the commencement of clearing activities and to protect identified sites from clearing activities and associated disturbance until breeding activities are terminated.

Details on the protocol for pre-disturbance breeding bird surveys are provided in Appendix B.

Following the completion of pre-disturbance breeding bird surveys, the following mitigation measures will be applied:

- If no active nests or probable nesting sites are detected, clearing of the survey area needs to be completed as quickly as possible, but at maximum within 72 hours from completion of the survey to minimize the likelihood of birds establishing new nests. If land clearing activities are not completed within that time window, then clearing must be suspended until the area is surveyed again;
- No-disturbance buffers will be established around confirmed active nests and probable nest locations as determined by the survey observers’ professional judgement. Minimum buffer distances will be selected according to the species-specific buffers presented in Table 6-1. Buffers vary in size based on the sensitivity of bird species or species groups to disturbance, their conservation status, the landscape context, and the level of sensory disturbance of Project activities. An overview of species/species groups habitats, behaviours, and potential Project effects taken into consideration during the development of these no-disturbance buffers is presented in Table 6-2. The lead QEP will be consulted in cases where there is uncertainty related to the selection of an appropriate set-back buffer distance;

- Nests will not be marked with flagging tape. Flagging tape will be placed along the edges of the no-disturbance buffer zone;
- The effectiveness of no-disturbance buffers will be verified in the field by watching the behaviour of nesting birds. Buffers will be deemed effective when birds do not appear agitated, do not display alarm behaviour, do not flush from their nest, and resume normal behaviours. If the buffer distance appears suboptimal, buffer distances will be increased on a case-by-case basis to ensure their effectiveness;
- If land clearing within buffered areas is required before the end of the breeding season for the applicable nesting period for Zone B8, a QEP or experienced observer will conduct additional pre-disturbance breeding bird surveys within the buffered area every seven to 14 days to confirm the status of breeding activity at the nest. No-disturbance buffers will remain in place until breeding activities at the nest site have ended, typically after the young have fledged but occasionally after failed nesting attempts (e.g., nest abandonment, depredation); and,
- Clearing operations can resume in the buffer areas once active nests are deemed inactive and no new nests are located or after the end of the applicable nesting period for Zone B8. Except for the nests of designated species at risk, the nests of most migratory bird species may be destroyed, damaged, disturbed or removed when they do not contain a migratory bird or viable egg.

Table 6-1: Recommended No-disturbance Buffer for Active Bird Nests and Probable Nesting Sites

Species	Minimum Recommended Buffer ^{1 2}
Songbirds & Other Small Birds E.g., sparrows, warblers, flycatcher	Low intensity activities: 10-20 m High intensity activities: 30 m
Waterfowl, Loons, & Landfowl E.g., Northern Pintail, Common Loon, Rock Ptarmigan	100 m
Trumpeter Swan	500 m
All cliff-nesting raptors Golden Eagle, Gyrfalcon, Peregrine Falcon	1,000 m horizontal and 600 m vertical
All Tree and Ground Nesting Raptors and Owls	Species-specific minimum recommended buffers in <i>Habitat Protection Guidelines for Yukon Raptors, Ver. 2011</i> (EDI Environmental Dynamics Inc. 2011),
All SARA Schedule 1 or COSEWIC listed species	100 m

¹ All listed buffer distances are subject to change based on the conditions at site and the surveyor's professional judgement. If the recommended buffer is not feasible, a site-specific management plan will be developed by a QEP.

² Several guidelines were consulted in the development of recommended buffers including the *Yukon Forest Resources Act: Wildlife Features Standard* (Yukon Energy Mines and Resources 2014), *Habitat Protection Guidelines for Yukon Raptors, Ver. 2011* (EDI Environmental Dynamics Inc. 2011), *Guidelines for Raptor Conservation during Urban and Rural Land Development in British Columbia* (BC Ministry of Forests, Lands and Natural Resource Operations 2013), and *Guidelines to avoid harm to migratory birds* (Government of Canada 2023).

BMC also commits to the following mitigation measures to prevent and minimize disturbance to migrating and breeding birds. Additional species-specific mitigations are presented in Table 6-2:

- During the spring (mid-April to early June) and fall (late August to late September) migration periods, helicopter flights will avoid waterbodies to prevent disturbing staging waterfowl and waterbirds as they use high amounts of energy during migration and require rest and opportunities to replenish their energy reserves. Aircrafts pilots will also be advised to pay special attention to flocks of migratory birds during these periods due to the higher risk of bird strikes.

- Active nests (containing eggs and/or chicks) located incidentally during work activities will be treated with the same mitigation measures as nests detected during pre-disturbance breeding bird surveys (i.e., a no-disturbance buffer will be established around the nest until the nest is no longer active);
- Buildings, other Project infrastructure, and equipment will be monitored during the breeding season and, where early signs of nesting attempts are detected (e.g., lumps of mud, bits of nesting materials), permanent and/or temporary nesting deterrents will be installed (e.g., bird spikes, visual deterrents, netting);
- All seasonally inactive equipment will be inspected for active nests in the spring before first use;
- Established bird nests on occupied or utilized Project infrastructure will not be intentionally disturbed, breeding birds will not be harassed, and their nests and eggs will not be removed. If operationally feasible, a no-disturbance buffer will be established around the nest or work activities will be reduced or limited to those essential to operational requirements until the young birds have fledged; and,
- To prevent bird mortalities from collisions with windows, high risk windows such as, paired windows at right angles to each other, and windows that reflect surrounding vegetation will be identified and treatments/deterrents will be installed to the exterior of the windows (e.g., dot/line patterns made from decals, rope curtains, mosquito screens, netting, one-way transparent film). Treatments/deterrents will also be applied to any other windows where collisions are documented.

Table 6-2: Species-specific Considerations, Potential Project Effects, and Additional Mitigations

Bird Grouping or Species	Species-Specific Habitat and Behaviours	Species-Specific Potential Effects or Risks	Additional Mitigations or Activities to Avoid
Cliff-Nesting Raptors • Golden Eagles • Gyrfalcon • Peregrine Falcon	Cliff-nesting raptors often nest early and may occupy nests from March 25 to August 24 (Table 2-2)	Sensory disturbance.	Checks for cliffs nesting activity, and nests prior to clearing. If nests are present clearly mark no go buffers and inform crews during daily toolbox meetings. The Yukon standard for the no disturbance buffer for cliff-nesting raptors is 1,000 m. It is based on the minimum disturbance buffer for Gyrfalcon which is the most sensitive to sensory disturbance of the three cliff nesting raptor species (EDI Environmental Dynamics Inc. 2011). Routine flights will avoid nesting sites. If helicopter flights are necessary near active cliff-nesting raptor nests, sites will be approached on a tangential flight path, helicopters will avoid approaching cliffs from behind, and repeated aerial disturbance will be avoided.
Tree-Nesting Raptors and Owls • American Kestrel • Bald Eagle • Merlin • Red-tailed Hawk, • Sharp-shinned hawk	Typically nest in trees with good visibility or proximity to prey from April 28 to August 14 (Bald Eagle is more variable; Table 2-2)	Sensory disturbance and accidental removal of nest trees.	Raptor nests are protected at all times under the Wildlife Act, whether active or inactive (Government of Yukon 2002b). Check for tree nesting activity and nests prior to clearing. If nests are present, clearly mark no disturbance buffers and inform crews during daily toolbox meetings. The minimum no-disturbance buffer distance will follow those recommended in the <i>Habitat Protection Guidelines for Yukon Raptors, Ver. 2011</i> (EDI Environmental Dynamics Inc. 2011). All tall inactive equipment will be checked in March and April for active nests.

Bird Grouping or Species	Species-Specific Habitat and Behaviours	Species-Specific Potential Effects or Risks	Additional Mitigations or Activities to Avoid
Short-eared Owl (Special Concern)	Ground nester in grassland ecosystems with some low shrubs.	Sensory disturbance in nesting habitat during progressive clearing.	Survey potential habitat during twilight for activity that could indicate nesting (when clearing is scheduled during nesting periods). If present, clearing will be postponed until the nest is no longer active.
Common Nighthawk (Special Concern)	Ground nesters. Nests can be constructed on disturbed sand and gravel areas.	Sensory disturbance of nesting habitat during progressive clearing or creation of nesting habitat in cleared borrow areas.	Revegetate disturbed areas when they are no longer in use and there are no plans for future use. Revegetation dates will vary based on the characteristics of the site and plant species being planted and will be selected to maximize the chance that plants will thrive. Generally seeding will occur during each growing season (between June and August) and planting seedlings would occur in the spring or fall. Pre-disturbance breeding bird surveys during twilight in old disturbed and undisturbed areas prior to any new land clearing (when clearing is scheduled during nesting periods). If present, clearing will be postponed until the nest is no longer active.
Sandhill Cranes and Trumpeter Swan (Specially Protected)	The Tintina Trench, which follows the lowlands to the north of the Project, is a major flyway for these species. These species have not been observed to land in the Geona Creek Valley during the exploration and baseline studies that have been conducted since 2015.	If behaviours change and more individuals stop around the Project on their migration route they may become disturbed by mining activities, at risk of entrapment, or exposure to contaminants in water management ponds.	If birds are observed, install bird deterrents on water management ponds that do not meet the Water Quality Objectives. Options could include: motion sensor water sprinkler, acoustic deterrents, bird balls, etc. The option(s) selected will prioritize the birds health and will minimize risk of injury to the bird.
Ptarmigan and Grouse	Ground nesters in open forests and shrub meadows, mainly in the subalpine and alpine.	Potential to disturb nests during clearing.	Plan to avoid clearing during nesting periods. If clearing must occur during nesting periods, pre-clearing nesting survey will be conducted, and buffers set around any active nests.
Barn Swallows (Threatened)	Generally nest in cup shaped mud nests on anthropogenic structures.	Swallows may nest in rafters and eaves of buildings.	Design buildings and install deterrents to prevent birds from nesting in buildings if and where needed. All inactive equipment will be inspected for active nests in the spring before first use.
Bank Swallows (Threatened)	Nest in burrows in sandy embankments such as along streams.	May nest in embankments of borrow or cleared areas.	Follow the guidance provided in the Bank Swallow recovery strategy published by ECCC (Environment and Climate Change Canada 2021b). Surveys in old embankment areas prior to any new land clearing during nesting periods. If present, clearing will be postponed until nests are no longer active.
Perching Birds (Olive-sided Flycatcher and Rusty Blackbird are threatened)	Perching birds in the Project Area are mostly migratory. They nest in a variety of habitats including grasses, low bushes, or trees.	Potential to disturb nests during clearing.	Plan to avoid clearing during nesting periods. Complete pre-clearance nesting surveys if clearing during nesting periods and establish buffers around nests or potential nests.

Bird Grouping or Species	Species-Specific Habitat and Behaviours	Species-Specific Potential Effects or Risks	Additional Mitigations or Activities to Avoid
Cavity Nesters (Chickadees, Woodpeckers, some waterfowl species)	Species specific nesting periods. Often nest earlier than other songbirds.	Potential to disturb nests during clearing.	Avoid clearing during nesting periods. Retain cavity trees (not active) when possible. Complete pre-disturbance breeding bird surveys if clearing during nesting periods cannot be avoided and establish buffers around nests or probable nesting sites.
Waterfowl and Shorebirds (Horned Grebe and Red-necked Phalarope are Special Concern; Lesser Yellowlegs is Threatened)	Nest site selection variable between species but is generally within 100-200 m of open water. Includes emergent vegetation zone and upland ecosystems including wetland margins, shrub, and forest (including nesting cavities for some waterfowl species).	Lost wetland habitat. Potential to disturb nests during clearing. May try to use water management ponds, ABM lake, or the constructed wetlands.	Avoid clearing during nesting periods. Complete pre-clearance nesting surveys if clearing during nesting periods and establish buffers around nests or potential nests. If birds are observed, install bird deterrents for any ponds expected to not meet the Water Quality Objectives. Treat pit water when filling after closure to maintain water quality at acceptable concentrations to protect wildlife. Lost habitat is partially offset by creation of the Fish Offset Ponds and reclaimed wetlands in the post-closure phase of the Project.

6.3.1 Cliff-nesting Raptors

Cliff-nesting raptors present in the RSA include Golden Eagle, Gyrfalcon and possibly, Peregrine Falcon. These species can be sensitive to disturbance from human activities during the nesting season and Project activities in proximity to active nests have the potential to result in partial or complete nest failure. These species use well defined nesting territories which generally contain multiple nesting sites spaced up to 1000 m apart that may be used alternately between years. Nesting territories are often occupied for multiple years and generations, and a breeding pair's ability to relocate may be limited due to the availability of alternative habitat and territoriality of neighbouring pairs.

Only one Golden Eagle nest site has been documented in the LSA to date. Nesting success at this site appears extremely low given that it is on a small rock outcrop and easily accessible by terrestrial predators. Another Golden Eagle nesting site is located southeast of the LSA and is likely an alternative nesting site of the same pair.

In addition to general wildlife mitigation measures, the following actions will be taken by BMC to prevent habitat loss and sensory disturbance to cliff-nesting raptors:

- Any raptor nest sites identified will be protected regardless of activity or evidence of breeding, unless otherwise directed in a site-specific management plan developed by a QEP;
- BMC will maintain a database of raptor nesting sites. This database will include historic nest sites documented by Yukon Environment and the Yukon Conservation Data Centre (YCDC) as well as nesting sites detected by BMC during baseline studies and incidentally during other Project activities;
- For known nesting sites located within 1,000 m of planned Project activities, a QEP will conduct a nest survey to assess occupancy prior to any Project activity during the nesting period (March 25 to August 24);
- A no-disturbance buffer of 1,000 m horizontal and 600 m vertical distance will be established around active cliff-nesting raptor nesting sites for the duration of the breeding season (to August 24) or until

a survey is completed by a QEP to confirm the nest is no longer active.. All types of Project activities, including personnel on foot, equipment, and helicopters, will be excluded from the buffer;

- Blasting will be restricted to the active Mine and will occur on a regular schedule, likely once at the same time each day or every second day. Minor blasting outside the Mine may be needed for construction and will be scheduled to avoid nesting periods within 1,000 m of active nests;
- Routine flights will avoid nesting sites. If helicopter flights are necessary near active cliff-nesting raptor nests, sites will be approached on a tangential flight path, helicopters will avoid approaching cliffs from behind, and repeated aerial disturbance will be avoided;
- Where Project activities are required within 1,000 m of a cliff nesting-raptor nesting site (e.g., camp site, access network), a site-specific management plan will be developed by a QEP (raptor biologist) to recommend and manage allowable Project activities and to establish a suitable no-disturbance buffer distance where possible. To the extent possible, the minimum no-disturbance buffer distance will be no shorter than the shortest no-disturbance buffer distance recommended in the *Habitat Protection Guidelines for Yukon Raptors, Ver. 2011* (EDI Environmental Dynamics Inc. 2011). If required, this plan will be submitted to the Chief, Mining Land Use to permit activities in the prescribed area and time period; and,
- Any inactive nests (whether during the breeding period or not) will not be altered, unless those actions are part of a site-specific management plan designed to make a specific nesting site unavailable within a nesting territory ahead of the nesting season. Cliff nesting raptors typically have 2-4 nesting sites within their nesting territory. Preventing access to a nesting site located in proximity to planned activities ahead of the nesting season may maximize reproductive success by minimizing disturbance. Such activities would require an authorization under Yukon's *Wildlife Act*.

6.3.2 Bank Swallow

The Bank Swallow is a migratory bird species at risk designated Threatened under Schedule 1 of the SARA (Environment and Climate Change Canada 2022). During the breeding season, they are drawn to sand and gravel pits, stockpiles of sand and soil, and sandy banks along water bodies and roads which they use to establish nesting colonies. Therefore, Bank Swallow may be attracted to the granular resource quarries and pits required for Project development (Section 4.6). Bank Swallows generally dig their burrows in near-vertical banks (slopes of at least 70 degrees) that are more than 2 m high. Bank swallows use their nesting sites from May to August (May 30 – August 2 in BCR4) and work activities near nesting colonies during this period have the highest risk of directly harming birds and affecting breeding success. The absence of birds at nesting colonies in August is a good indicator that the breeding season is over. The mitigations proposed in this section follow those recommended by ECCC in *Bank Swallow (Riparia riparia): in sandpits and quarries* (Environment and Climate Change Canada 2021c).

The following mitigations will be implemented where nesting colonies have not been established:

- In areas where operations will be carried out during the breeding season, sand, soil, and gravel piles will be contoured to have a slope of less than 70 degrees;
- At the end of each work day, operators in granular resources quarries and pits will flatten vertical faces to prevent Bank Swallows from digging burrows overnight or on weekends; and,
- When vertical faces of more than 70 degrees need to be maintained for operational requirements during the breeding season, scaring devices will be installed to deter Bank Swallows from establishing colonies in active work areas.

Where a Bank Swallow nesting colony is detected or is suspected, a QEP will conduct a stand watch visual survey to determine if the nesting colony is active or not. The following mitigations will be implemented during the breeding season (May 30 – August 2 in BCR4) in areas with established and active nesting colonies:

- A minimum protective buffer of 50 m will be maintained around the colony to protect it from noise or vibrations generated by work operations;
- During intensive periods of work activities, a larger protective buffer will be applied to minimize the risk of disturbance to the nesting colony. If required, a site-specific management plan will be developed by a QEP to recommend and manage allowable Project activities and to establish a suitable no-disturbance buffer distance where possible. The buffer size will be decided on a case-by-case basis by a QEP which will consider the site activities required, their location relative to the colony, site specific characteristics, and the size of the colony;
- Excavation works will be stopped if Bank Swallows colonize a bank in an active area, and operations will not resume until all nestlings have fledged and the colony is no longer attended by adults and young at the end of the breeding season;
- Scaring devices will not be used once a colony is established and active as they may interfere with ongoing Bank Swallow breeding activities; and,
- If a nesting site needs to be excavated after the end of the breeding season, an alternate site that can support nesting in the following year will be created nearby provided that it won't result in operational constraints the following year. Suitable Bank Swallow nesting habitat can be created by excavating banks with vertical faces of at least 70 degrees.

6.4 COLLARED PIKA

Collared pika are designated Special Concern under Schedule 1 of the SARA (Government of Canada 2016). The YCDC does not have any records of collared pika Element Occurrence within the LSA or RSA (<https://yukon.ca/biodiversity>). However, collared pika were documented at five sites in the LSA in 2015 and 2016 as part of baseline studies for the Project (Alexco Environmental Group 2016). To date, all survey and incidental pika observations in the LSA were located over 500 m from the proposed Project Area and habitat suitability mapping identified all the Project Area as having low suitability. Moderate and high suitability pika habitat is present in subalpine and alpine ecosystems elsewhere in the LSA, mainly southwest of the Project Area. Project activities are unlikely to result in direct pika habitat loss.

To limit potential effects to pika, the following mitigation measure will be applied:

- Pre-activity surveys for the presence of pika will be conducted by a QEP for all earthworks located in suitable pika habitats. Suitable habitats consist of boulder fields and talus slopes at elevations between 700 – 1,800 m;
- Observations of collared pika will be reported to the Environmental Department within 24 hours;
- If collared pika are observed in the Project Area, BMC will contact the Regional Biologist in Watson Lake (867-536-3214) for advice on possible mitigations (Operational Guideline – LQ00424b);
- Project activities near boulder fields or talus slopes occupied by collared pika will maintain a 100 m no-disturbance buffer, where feasible, or a site-specific management plan will be developed in consultation with a QEP; and

- Absence of collared pika observations in the wildlife logs for Project activities in suitable pika habitat will be a trigger to change the monitoring program through the Adaptive Management Plan.

6.5 WOLVERINE

Wolverine are designated Special Concern under Schedule 1 of the SARA (Government of Canada 2016). Having large territories, wolverine can be found in a wide range of habitats and are known to occur throughout the RSA. Project activities have the potential to disturb active den sites and reduce available habitat. To minimize impacts to wolverine:

- Any den sites discovered will be reported to the Environmental Department within 24 hours; and,
- Active dens will be protected with a 1 km no-disturbance buffer, where possible, or a site-specific management plan will be developed in consultation with a QEP.

6.6 THINHORN SHEEP

Thinhorn sheep exhibit a range of responses to anthropogenic disturbances. Although wild sheep regularly habituate to certain types of disturbance, including major roads and mining activities (e.g., Faro mine, Sheep Mountain), they can also be sensitive to disturbance at certain times of the year or at certain locations. For thinhorn sheep, Environment Yukon identifies seasonal key habitats relevant to time periods when sheep are deemed sensitive to disturbance as part of its WKA Inventory Program (Government of Yukon 2014). These seasonal WKAs include:

- Early-winter – November 1 to December 15;
- Winter range – November 1 to April 30 (overlaps with the rut); and,
- Spring lambing – May 1 to June 15.

During the early-winter rut, snow does not typically limit habitat availability and movements (Walker et al. 2007). As winter progresses, habitat availability and movement within sheep range is restricted by snow and sheep often become confined and concentrated into small areas with reduced snow accumulation and available forage (Walker et al. 2007). During lambing, ewes and lambs often use traditional lambing areas where they can avoid predators (Frid and Dill 2002, Ciuti et al. 2008). Lambing areas typically consist of secluded sites within rugged terrain, often in proximity to winter range (Walker et al. 2007). There is strong biological rationale for avoiding disturbance to sheep during the lambing period. During this period sheep are typically in their poorest body condition, forage availability is low, pregnant ewes select specialized habitat for lambing, and movements may be encumbered by persistent snow or limited physical abilities of newly born lambs (Bowyer et al. 2000, Walker et al. 2007).

Environment Yukon identifies several WKAs within the RSA for thinhorn sheep as part of their WKA Inventory Program but none intersect the LSA (Government of Yukon 2014). Sheep were documented incidentally in the RSA during baseline studies for the Project from 2015 to 2023, but none were documented within the LSA (BMC, unpublished data). The closest identified sheep range (anecdotal) is located south of the North Lakes, approximately 7 km southeast of the Project LSA (Government of Yukon 2014).

Given the low abundance of thinhorn sheep and their known distribution in the RSA, the Project is not expected to directly interact with sheep. However, there could be potential for Project-related activities that require aircraft overflights, particularly by helicopters, that result in disturbance to thinhorn sheep if any are present

in the vicinity of the Project on flight paths between the Project and Yukon airstrips/airports (Mining Environment Research Group 2006). To minimize disturbance to thimhorn sheep, BMC will apply the mitigation measures for helicopter operations described in Section 5.2.3.2, avoid flying over the sheep key areas identified in Figure 3-1 on transit flights between Whitehorse and camp, and adhere to the best practices described in Flying in Sheep Country: How to Minimize Disturbance from Aircraft (Mining Environment Research Group 2006), including:

- Aircrafts will fly more than 3.5 km away from areas known to be occupied by sheep whenever possible;
- Plan flight routes to avoid sensitive areas and placing a ridge between the helicopter and areas known to be occupied by sheep;
- When aircrafts must fly in proximity to sheep, aircrafts will fly below and/or at an angle on their approach;
- When sheep are observed on helicopter flights, the route will be modified to increase the horizontal and negative vertical separation distance between the aircraft and the animals;
- When sheep are present, flight time will be concentrated to limit the number of events and duration of the period of flying to which sheep are exposed in a given area;
- Fly when sheep are active (i.e., during the morning) and avoid flying when sheep are inactive (i.e., during the afternoon) in areas where sheep are known to occur; and,
- If any sheep are observed in the LSA during sensitive time periods (November 1 to June 15), a site-specific management plan will be developed by a QEP to minimize disturbance to sheep.

6.7 MOOSE

Moose do not have any conservation designations at the federal or territorial levels. They are the second most abundant large mammal species in the RSA after caribou. In 2016, Environment Yukon released the *Science-based Guidelines for Management of Moose in Yukon* (Environment Yukon 2016b). The guidelines provide an overview of the scientific information used by Environment Yukon to make monitoring and harvest management decisions specific to moose populations in Yukon. Moose are distributed throughout the RSA at variable densities according to the suitability of seasonal habitats.

Moose are relatively resilient to disturbance compared to other ungulate species found in the Yukon. Road density in excess of 0.6 km/km² has been identified as an apparent threshold value of habitat degradation above which ungulate populations such as moose start to decline (Beazley et al. 2004). Studies examining the effects of disturbance on moose distribution and behaviour along access corridors found that those effects were limited to within 1,000 m of roads, with most effects occurring within 250–300 m of roads (Colescott and Gillingham 1998, Yost and Wright 2001, Laurian et al. 2008, 2012, Shanley and Pyare 2011). Differences between study results were likely related to traffic volume, moose habituation to disturbance, and habitat suitability specific to individual study areas.

Control and activity specific mitigation measures (Chapter 4 and Chapter 5, respectively) are expected to provide adequate protection for this species and no species-specific measures are currently proposed.

6.8 LITTLE BROWN AND NORTHERN MYOTIS (BATS)

Two bat species with a federal conservation status designation occur in Yukon, the little brown myotis and northern myotis. Both were designated Endangered under Schedule 1 of the SARA and by COSEWIC due to a

94% decline of hibernating *Myotis* species in eastern Canada caused by White Nose Syndrome (COSEWIC 2013a, Environment and Climate Change Canada 2018).

The distribution of little brown myotis extends from southern to central Yukon (Slough et al. 2014, Slough and Jung 2020). Until recently, the distribution of northern myotis in Yukon was thought to be limited to regions adjacent to the southern border with British Columbia from southcentral to southeast Yukon (Jung et al. 2006, Lausen et al. 2008, COSEWIC 2013a, Slough 2015). However, recent bat acoustic monitoring studies detected northern myotis as far north as 62.7°N (EDI, unpublished data).

The potential for interactions between little brown and northern myotis with the Project is restricted to the months between May and September because bats do not overwinter in Yukon (Government of Yukon 2019). During these months, mature and old-growth conifer stands may be used for roosting and open ecosystems within forest stands such as rivers and creeks, marshes and wetlands, riparian zones, and the edges of post-fire early succession forests are likely to provide opportunities to access key forage areas abundant with insects (Slough and Jung 2008, Government of Yukon 2019). Bats, especially little brown myotis, may also use existing anthropogenic structures for roosting sites given their affinity for human settlements (Thomas and Jung 2019).

Bats are not expected to interact with the Project infrastructure given the poor habitat suitability of high elevation ecosystems where the mine and associated infrastructure will be located. However, bats may interact with parts of the Access Road at lower elevations where mature forest stands for roosting are located adjacent to riparian areas near ponds and streams for foraging. Therefore, the primary protection mechanism for bats within the Project Area will be to plan vegetation clearing activities in advance and conduct land and vegetation clearing activities of large-diameter forest stands outside the breeding season (May to August). By doing so, scheduled works will avoid most risks of disturbance or accidental take of roosting bats and their young.

6.9 YUKON CONSERVATION DATA CENTRE REPORTABLE SPECIES

Accurate information about rare species and species at risk is essential to effectively manage, conserve, and protect natural resources. The YCDC gathers, maintains, and distributes information on all Yukon animals and plants with a focus on rare species (<http://www.env.gov.yk.ca/animals-habitat/cdc.php>). The YCDC developed a list of reportable animals and plants that they are actively tracking. Table 6-3 presents a list of YCDC reportable species that are known to occur or that may potentially occur in the LSA and RSA. Fact sheets produced by the YCDC for these species are found in Appendix G.

The only Element Occurrence (EO) for YCDC tracked species currently documented within the RSA are for Barn Swallow (EO #677) and Rusty Blackbird (EO #770 and #771) along the RCH. However, few studies documenting rare species have occurred in the RSA and tracked species are likely more widespread. Other sources of data, such as eBird Canada (<https://ebird.org/canada/map/>) and iNaturalist Canada (<http://inaturalist.ca/>), can be accessed to ascertain the potential presence of some of these species.

General wildlife mitigation measures as well as the species and species group mitigation measures described above are expected to provide adequate protection for the mammal and bird species presented in Table 6-3. Currently, knowledge about rare insects in the LSA is insufficient to guide species-specific management measures.

To minimize potential effects on rare species in the Project Area and LSA:

- BMC will contact the Yukon Conservation Data Centre (867-471-0985) for up-to-date information on species of special concern that may be found in the Project Area. If these species or sign of their

presence are identified/encountered in the Project Area, BMC will contact the Regional Biologist in Watson Lake (867-536-3214) for advice on possible mitigations (Operational Guideline – LQ00424b);

- Key elements of this WPP will be discussed during site orientation with all Project personnel and contractors. This WPP and fact sheets on all the rare wildlife species that may potentially occur in the Project Area will be available at the camp's Environmental Department office;
- A temporary no-activity perimeter buffer of 30 m will be established around the extent of detected occurrences if individuals remain in the general area where they were detected. The Environmental Department will then be notified and confirm the identification of the occurrence with a QEP before a mitigation plan is developed that identifies and allows action on next steps if deemed necessary (e.g., probable presence of a nest, low mobility species);
- All confirmed observations of tracked species will be reported to the YCDC;
- The YCDC will be contacted for additional mitigation measures when Project activities and operational requirements conflict with rare insect occurrences; and,
- Species-specific management measures may be developed in the future, as supported by new information.

Table 6-3: YCDC Reportable Species Known or Expected to Occur in the Local Study Area

Common Name	Scientific Name	Conservation Status Canada ¹	Conservation Status Yukon ¹
MAMMALS			
Collared pika	<i>Ochotona collaris</i>	Secure	Apparently Secure
Woodchuck			
BIRDS			
American Kestrel	<i>Falco sparverius</i>	Secure	Imperilled
Bank Swallow	<i>Riparia riparia</i>	Secure	Secure
Barn Swallow	<i>Hirundo rustica</i>	Secure	Vulnerable
Common Nighthawk	<i>Chordeiles minor</i>	Apparently Secure	Imperilled
Harlequin Duck	<i>Histrionicus histrionicus</i>	Apparently Secure	Vulnerable
Northern Shrike	<i>Lanius excubitor</i>	Secure	Vulnerable
Olive-sided Flycatcher	<i>Contopus cooperi</i>	Secure	Imperilled
Peregrine Falcon	<i>Falco peregrinus</i>	Vulnerable to Apparently Secure	Vulnerable
Red-necked Phalarope	<i>Phalaropus lobatus</i>	Apparently Secure	Vulnerable
Rusty Blackbird	<i>Euphagus carolinus</i>	Apparently Secure	Vulnerable
Sandhill Crane	<i>Grus canadensis</i>	Secure	Vulnerable to Apparently Secure
Short-eared Owl	<i>Asio flammeus</i>	Vulnerable to Apparently Secure	Vulnerable
Smith's Longspur	<i>Calcarius pictus</i>	Secure	Vulnerable
Wandering Tattler	<i>Tringa incana</i>	Apparently Secure	Vulnerable
Yellow-bellied Flycatcher	<i>Empidonax flaviventris</i>	Secure	Vulnerable
INSECTS			
Arctic Tiger Moth	<i>Acerbia alpina</i>	Imperilled to Vulnerable	Imperilled to Vulnerable
Compton Tortoiseshell	<i>Nymphalis l-album</i>	Secure	Vulnerable to Apparently Secure
Milbert's Tortoiseshell	<i>Aglaia milberti</i>	Secure	Vulnerable

¹ Data derived from Wild Species 2020: the General Status of Species in Canada (Canadian Endangered Species Conservation Council 2022).

7 MONITORING

7.1 MONITORING PROGRAM

The wildlife monitoring program will focus on identifying changes to wildlife habitat use and movement patterns resulting from Project development and operations. Table 7-1 outlines the wildlife surveys, frequency, and schedules for each monitoring component. The monitoring program may be modified and adapted over time based on the results of monitoring studies and on the advice of a QEP. Baseline protocols will continue to be used for monitoring programs during Construction, Operations, and Closure phases. Monitoring data will be reviewed and incorporated into annual reports to identify whether the objectives and targets of the WPP are being met and to determine if any corrective actions or changes are needed to mitigate effects to wildlife from the Project. Annual reports will be submitted to regulators and Kaska for review and comments.

Traditional knowledge and scientific research will be used to update the WPP as it becomes available. When possible, two Kaska Land Stewards and/or Traditional Knowledge team members will be contracted to participate in the wildlife monitoring programs. The involvement of Kaska Land Stewards will ensure their understanding of the effects of the Mine on wildlife, especially culturally important species, and to ensure the incorporation/consideration of Kaska Traditional Knowledge in the monitoring program. The results of all wildlife monitoring programs will be provided to Kaska annually for their opportunity to comment prior to submission to regulators.

As more information becomes available, the wildlife monitoring program will be updated to include any changes in Project scope or wildlife use of the Project site.

The company is committed to the following monitoring activities:

- Wildlife sighting will be documented on the wildlife observation card (Section 7.2) and reported to BMC's Environmental Department who will maintain an electronic wildlife sighting log;
- Monitoring of caribou and moose will continue every year, using baseline survey methods, that may be updated from time to time (Table 7-1).
- Annual post calving and rut surveys for caribou will be completed in conjunction with YG. These surveys will include moose, and the method will be developed annually in discussions with the YG Regional Biologist;
- Frequency of surveys should be established in two year periods, commencing upon mine construction, subject to review at annual meetings of the Yukon Government, BMC, affected First Nations, and other resource users in the area, including, but not limited to representatives of outfitters and trappers groups (the "Interested Parties"). The period for which surveys are required should be for the life of the mine, unless otherwise determined by the parties (Clause 2.2[i], Schedule 2 – Lease Agreement 105G07-001);
- Survey methodology shall include participation in annual YG post calving and rut surveys for caribou in conjunction with YG ENV survey schedules. Moose observations for the project area should be included in these surveys. Methodology, including participation, should be determined annually through discussions with the YG's Regional Biologist (Clause 2.2[iii], Schedule 2 – Lease Agreement 105G07-001);

- Provide Interested Parties with an annual report of wildlife surveys for review in annual meetings (Clause 2.2[iv], Schedule 2 – Lease Agreement 105G07-001); and,
- Follow up with YG and Interested Parties to review the results of surveys findings and effects monitoring. Reformatting of the wildlife monitoring design may also be required to reflect changing conditions (Clause 2.2[v], Schedule 2 – Lease Agreement 105G07-001).

Table 7-1: Wildlife Monitoring Program Summary

Monitoring Program Component	Project Phase ¹	Methods and Objective	Timing	Duration	Frequency	Location
Wildlife Records Program (Section7.2)	PC, C, O, CI	Wildlife observations and locations reported by employees and contractors on site and along the Access Road will be recorded on observation forms and transcribed weekly to the site log. Information will be used to identify wildlife movement corridors, identify any potential changes in wildlife health, monitor wildlife species using the Project Area, identify high risk areas, record the effectiveness of mitigations, record wildlife-related incidents, and identify any unexpected effects.	Continuous (ongoing)	Continuous (ongoing)	Continuous (ongoing)	Project Area and Access Road
Finlayson Caribou Herd Monitoring (Sections 7.1.2 and7.1.3)	PC, C, O, CI	Seasonal Distribution Surveys (Section7.1.3): Seasonal aerial surveys will be conducted using methods and survey areas consistent with those of the 2015 through 2023 baseline surveys (BMC Minerals Ltd. 2023b). Information will be used to monitor and identify any changes in the herd’s distribution and relative abundance relative to the Project. Composition data recorded during the fall rut surveys will be used to monitor herd composition and recruitment to estimate population trends between population censuses. Wildlife Movement Program (Section7.1.2): 90 remote cameras were deployed to monitor the timing and location of caribou seasonal movements and predator-prey dynamics (i.e., functional response and facilitated predation) within and in the vicinity of the Project Area.	Seasonally during the post calving (mid-July), fall rut (early October), early winter (late November), and late winter (mid to late March). During the post calving surveys, GPS locations and pictures of the boundaries of several reference snow patches will be collected to help track snow patch changes over time. Wildlife Movement Program: Continuous (ongoing)	Seasonal Distribution Surveys: 2 to 4 days each Wildlife Movement Program: Continuous (ongoing)	Seasonal Distribution Surveys: Annual through construction and the first two full years of operation, and every two years thereafter. Wildlife Movement Program: Continuous (ongoing)	Seasonal Distribution Surveys: Survey areas as per baseline surveys (BMC Minerals Ltd. 2023b). Wildlife Movement Program: LSA
Moose Monitoring (Sections 7.1.1 and7.1.3)	PC, C, O, CI	Winter distribution surveys: Winter aerial surveys will be conducted using methods and survey areas consistent with those of the 2015 through 2023 baseline surveys (BMC Minerals Ltd. 2023b). Information will be used to monitor and identify any changes in moose distribution and relative abundance relative to the Project. Effects monitoring survey: A moose effects monitoring survey program (Appendix E) was developed based on the late-winter survey methodology developed by Environment Yukon (Analythium Solutions 2023) to monitor moose distribution and habitat selection and the potential effects of sensory disturbance.	Winter distribution surveys: early and late winter (late November and mid to late March, respectively). Effects monitoring survey: in March following the late winter distribution survey	Winter distribution surveys: 3 to 4 days each Effects monitoring survey: 4-5 days	Winter distribution surveys: Annual through construction and the first two full years of operation, and every two years thereafter. Conducted in conjunction with caribou early and late winter surveys. Effects monitoring survey: Annual through construction and the first two full years of operation, and every two years thereafter.	Winter distribution surveys: RSA (GMS 10-07) Effects monitoring survey: within a 10 km radius buffer from the Project infrastructure and Access Road
Pre-disturbance Grizzly Bear Den monitoring (Appendix D)	C, O	Pre-disturbance grizzly bear den aerial surveys will be conducted to locate grizzly bear dens within 2 km of known and potential winter and early spring work sites, and if any dens are detected, to prevent over-winter disturbance of hibernating bears. These surveys will be supported by on the ground monitoring by site Environmental Department personnel and incidentally by other workers for signs of bear denning near Project infrastructure (e.g., open pit).	Weekly from mid-October to mid-November.	0.5 day once per week over four weeks	Annual	Within 2 km of known and planned winter and early spring work sites
Waterfowl/Pond Monitoring	PC, C, O, CI	Waterfowl surveys documenting the total count by bird species at all water bodies near Project infrastructure and a sample of control sites. Methods will be consistent with those followed during baseline studies (Alexco Environmental Group 2016).	Spring migration, nesting season, fall migration	2 to 4 days per survey	Monitoring frequency will be adjusted as required to obtain representative sampling and identify any potential issues.	Standardized viewing locations in the LSA at all water bodies near Project infrastructure (water management ponds, fish habitat ponds) and a sample of control ponds.
Facility and WPP Compliance Monitoring	C, O, CI	Routine checking for wildlife issues on the site. Examples include checks to minimize availability of potential nesting locations on Project infrastructure and equipment during the pre-nesting and nesting periods. Regular checks of wildlife species use of Water Management Ponds. Regular inspections of beaver dams to ensure culverts and creeks are flowing and not inhibiting correct operation of water management facilities. The information will be used to ensure that Project activities are not harming wildlife and to monitor compliance with mitigations.	Continuous (ongoing)	Continuous (ongoing)	Continuous (ongoing)	Project infrastructure

¹ Project phase: PC=Pre-construction, C=Construction; O=Operations; CI=Closure Phases (Active, Transition, and Post-closure).

7.1.1 Moose Effects Monitoring Survey Program

The Decision Document requires BMC to develop a late winter effects monitoring survey program for moose (Section 1.5.3.1). Monitoring Condition E of the Decision Document states:

"That a survey program be instituted to monitor moose during late winter from construction through closure stages of the project. This survey program shall be designed through collaboration with affected First Nations."

Environment Yukon recently developed a survey methodology and statistical analysis for the purpose of detecting project effects from mines and linear developments on moose distribution (Analythium Solutions 2023). Environment Yukon intends to develop a proponent's guide for the new survey design to distribute to industrial partners. In the meantime, BMC developed a protocol for the Moose Effects Monitoring Survey Program design and methods based on materials and recommendations provided by ENV's Moose Biologist (Analythium Solutions 2023). This protocol can be found in Appendix E. BMC will initiate the first of these surveys in March 2024 (Table 7-1). Details on data analysis and statistical modelling will be added to the protocol once ENV releases the proponent's guide. Data analysis and statistical modelling will not be required until the construction and operation phases.

7.1.2 Wildlife Movement Monitoring Program

The wildlife movement monitoring program was initiated in October 2022 and is part of the *Additional Caribou Baseline Studies Workplan* (BMC Minerals Ltd. 2023a) which was developed by BMC in order to fulfill Condition 11(b) of the Decision Document (Section 1.5.3.4). The primary objective of this program is to collect information to improve knowledge on the timing and location of caribou seasonal movements within and in the vicinity of the Project Area. This program consists of deploying remote cameras to monitor wildlife movement along suspected movement corridors that interact or are in the vicinity of the Project (i.e., LSA). This study is intended to be complementary to aerial ungulate surveys, particularly the spring range and early-winter intensive surveys, as an alternative means to provide information on the spatiotemporal movements of caribou, albeit at a local level, that is usually collected through collaring programs. A better understanding of caribou movements will assist BMC in supporting effective monitoring and management of Project effects on caribou.

A secondary objective of the study is to monitor the potential effects of the Project on predator-prey dynamics (i.e., functional response and facilitated predation) by deploying a proportion of cameras on existing linear infrastructure and to assess their use by predators compared to natural wildlife trails. Remote cameras are one of the few methods available to collect data on large carnivores like bears and wolves.

Lastly, the program may yield sufficient information to allow its integration in the monitoring components of other species and species groups. This will be evaluated once a full annual cycle of data is collected from all deployed cameras and, if suitable, the monitoring programs for these species will be updated. For example, the program could potentially be used to monitor moderate size furbearers if sample sizes allow for meaningful comparisons in trends of furbearer abundance over time for some species (e.g., American marten, Canada lynx, red fox, wolverine). The program may also yield information on moose movements or on some species which may be present in the LSA at very low densities or during seasonal movements (e.g., thimblehorn sheep).

The study design consists of deploying cameras on selected wildlife trails, linear infrastructure (e.g., cut lines, trails), and the Access Road in a nested design where cameras from each "set" of three cameras are deployed within approximately 250 m of each other. The design also aims to achieve even spatial distribution and camera

sets were stratified by ecosystems in proportion to their availability in the LSA to the extent possible. Representative sampling of elevations is expected to be captured through ecosystem stratification.

All cameras deployed for this study were Reconyx Hyperfire2 HP2X Professional model remote cameras. These cameras are motion and infrared triggered. Cameras were programmed to take three consecutive photos when activated, with no delay between triggered events and to be operational 24 hours a day, with high sensitivity and no video. The cameras were also programmed to take one time-lapse photo at 13:00 each day, which will provide a snapshot of environmental conditions at each site throughout the year and confirm that the cameras were functioning correctly during extended periods without triggering events.

To help prevent theft and damage, locked metal security enclosures and locked steel cables were used to secure some of the most visible and accessible cameras (e.g., Access Road). Cameras were securely fastened to a large tree where available, or deployed on T-posts in open, treeless areas. Cameras were positioned to have an optimal view of the trail or road to maximize wildlife capture events.

To date, 24 cameras were deployed in October 2022 and 66 cameras in July 2023. Of these, 66 were deployed in nested sets (22 sets) in the LSA, 20 cameras were deployed individually on wildlife trails at various distances from the Project Area in the LSA, and 4 cameras were deployed in the Project Area with timelapse settings to take pictures of proposed Project infrastructure (ABM pit and the Class A, B, and C storage facilities).

To support the moose effects monitoring survey program, ENV requested that additional cameras be deployed on wildlife trails that cross the Access Road to assess whether the road is becoming more of a barrier to wildlife movement over time (i.e., road permeability; Phase5b IR from EMR dated June 16, 2023). The study will be adapted to include a paired camera design where two cameras are deployed on wildlife trails that cross the Access Road, one near the road and one approximately 200 m away from the road. This will require the deployment of an additional 15 cameras to the existing study in 2024 and making some adjustments to the location of some cameras.

Data metrics at each camera site will include camera type (wildlife trail, linear infrastructure, Access Road) and, for each animal detection, the species, number of animals, age, sex, direction of travel, date, and time. Camera maintenance will be conducted twice a year, once in spring shortly after spring melt and once in late fall prior permanent snow cover.

Long term camera studies strongly benefit from iterative data review to optimize the spatial and temporal coverage of the camera network. The initial selection of camera deployment sites was established to provide representative spatial coverage of the LSA and dominant ecosystems. The deployment locations will be reviewed and evaluated annually, and some cameras or camera sets may be relocated, based on the results of this and other Project studies, to optimize the knowledge gained from the study.

7.1.3 Ungulate Seasonal Monitoring Surveys

Baseline seasonal ungulate surveys were conducted annually from 2015 to 2023 to evaluate the relative abundance of moose and caribou in the RSA, determine their spatial and temporal distribution, and identify important seasonal habitats (Table 7-2). Seasonal surveys included post calving, fall rut, early winter, and late winter. Surveys were not conducted during the calving period because surveys can be disruptive to calving ungulates or to cows with newborn calves.

The focal species of post calving and rut surveys was FCH caribou while the focal species of early and late winter surveys were both moose and FCH caribou. The study areas for the post calving and rut caribou surveys were

based on the known range of the FCH during these life stages while the study area for the early and late winter moose surveys used the boundaries of the RSA (i.e., GMS 10-07). Details on survey areas and methods are presented in *Ungulate Baseline Report (2022-2023) – Kudz Ze Kayah Project* (BMC Minerals Ltd. 2023b).

Seasonal surveys to monitor caribou and moose will be continued annually through mine construction and the first two full years of mine operation and every two years thereafter.

Table 7-2: Summary of Baseline and Monitoring Ungulate Aerial Surveys

Life Cycle Phase	Target Species	Survey Area	Purpose	Survey Timing	Survey Frequency
Post Calving	Caribou	Caribou Post Calving Survey Area	Seasonal Distribution Seasonal Habitats Relative Abundance	Mid-July	Annually
Rut	Caribou	Caribou Rut Survey Area	Seasonal Distribution Seasonal Habitats Relative Abundance Population Composition	Early October	Annually
Early Winter	Caribou Moose	RSA (GMS 10-07)	Seasonal Distribution Seasonal Habitats Relative Abundance	Late November to Early December	Annually
Late Winter	Caribou Moose	RSA (GMS 10-07)	Seasonal Distribution Seasonal Habitats Relative Abundance	Mid to Late March	Annually

7.2 WILDLIFE RECORDS PROGRAM

BMC has a formal Wildlife Records Program (wildlife log) that includes a standardized observation form and requires participation from all BMC employees and contractors working on site. Wildlife logs will be maintained to provide information regarding the presence of wildlife and potential changes in their use of areas over time (Condition 15 – LQ00424b). Wildlife encounters will be entered on the wildlife observation card and wildlife incident form (Appendix C). The Environmental Department will summarize this information in an electronic wildlife observation log, which will be provided to the Chief, Mining Lands annually (Condition 15 – LQ00424b). The log will also be distributed and reviewed annually with Kaska, the YG’s Regional Biologist, and the Regional Conservation Officer. Any sightings of SARA-listed species will be reported to the YCDC.

Basic orientation is provided to all Project personnel at the beginning of the season or upon their arrival in camp and includes orientation on:

- Species at risk, rare species, and other focal species highlighted in this WPP; and
- Recording and reporting wildlife observations and associated behavioral responses to mitigation measures.

All on-site Project personnel are required to report all incidental and Project activity related wildlife sightings of:

- Species of conservation concern (Table 2-3);

- Focal terrestrial wildlife species (Table 2-4);
- Any active wildlife habitat feature, such as a den, nest, or mineral lick (Table 3-3); and
- Any unusual wildlife behaviours (e.g., an injured animal or defensive behaviour) or concentration of wildlife activity (e.g., multiple sightings of the same animal in the same location).

Project personnel are also encouraged to report any species found on the Yukon Conservation Data Centre reportable species list found in Table 6-3.

The wildlife observation card will include (Condition 15 – LQ00424b):

- Date and time of sighting;
- A detailed location description (coordinates are preferable);
- Species and number of animals;
- Age and sex if possible;
- Animal condition;
- Activity of the animals; and,
- Any comments.

This program provides a formal mechanism to collect information about the presence and distribution of wildlife within the Project Area that can also be used to monitor compliance with the work procedures described in this plan, assess the effectiveness of wildlife mitigations, and adaptively improve mitigations when required. For example, if Project personnel observe wildlife regularly approaching or spending time within or near Project equipment or facilities, it may indicate there is an attractant that is not being properly contained. Another example would be detection of a bird nest, which would result in targeted measures to protect the nest from disturbance until the nestlings have fledged.

The program has two components. The first is straightforward and entails the submission of incidental wildlife observation records. The second entails the submission of wildlife observation records documented prior to the initiation or in the course of work activities, documenting the mitigation measures that were applied, and recording the behavioral response of wildlife to the activity and/or mitigation. Specifically, Project personnel will look for the presence of reportable wildlife within or near the work site prior to initiating a work activity and periodically through the activity. If no wildlife is observed, personnel can commence or resume the activity while adhering to the relevant mitigation measures described in the WPP. When wildlife is observed at any work site, Project personnel will:

- Follow the mitigations appropriate to the activity and wildlife species described in this plan; and,
- Fill out an observation form including information on the work activity, location, species, applied mitigations, and behavioral response of wildlife to the activity and mitigation.

Wildlife log data will be used as an adaptive management tool to help assess the efficacy of mitigation measures on minimizing Project effects on wildlife and their habitat. Any grievances or comments from Kaska, Conservation Officers, trapline holders, non government organizations, guide outfitters, community members, or the public will also be recorded in the wildlife observation log.

7.2.1 Reporting of Wildlife Observations and Incidents

Reporting procedures for wildlife-human interactions, wildlife observations, and wildlife features (e.g., nest, den, mineral lick, or species at risk) will be included in personnel and contactor inductions. Reporting procedures will also include wildlife incidents (i.e., close, or aggressive encounters; unusual or erratic behaviour; traffic accidents or near misses; and dead or injured wildlife). Records will be managed by the Environmental Department

Any wildlife incidents or spills will be promptly reported to the Environmental Department. All incidents with wildlife will be reported to the District Conservation Officer in Watson Lake within 24 hours of the incident (Liard Region) at (867) 536-3210, as well as any other communication regarding wildlife (Condition 14 – LQ00424b; Clause 31iii and Schedule 2, Clause 4.4 – Lease Agreement 105G07-001). All spills must be reported immediately to the 24-Hour Yukon Spill Reporting Line (867) 667-7244 and to the Natural Resource Officer, Mining Division in Watson Lake & Whitehorse (867) 456-3882 (Condition 6 – LQ00424b). If, in the unlikely event, there is wildlife fatality along the Access Road or at Site, the Conservation Officer (Ross River 867-969-2202 or Watson Lake 867- 536-3210) will be notified within 24-hours. Other regulatory agencies will also be contacted as required (Table 7-3). Wildlife observations, monitoring programs, and incidents may require the development and implementation of additional mitigations and/or site or activity specific management plans as determined by BMC, YG, and Kaska.

Table 7-3: Contact List for Wildlife and Environmental Incidents

Incident	Contact	Phone	Email
Migratory Birds	ECCC CWS	1-800-668-6767	cwsnorth-scfnd@ec.gc.ca incidentaltake.priseaccessoire@ec.gc.ca
Human-Wildlife Conflict	Department of Environment and/or TIPP line	867-969-2202 1-800-661-0525	Environment yukon@yukon.ca
Wildlife Incidents	Conservation Officer	867-969-2202 (Ross River) 867- 536-3210 (Watson Lake)	coservices@yukon.ca
	RRDC Lands Department	867-332-6817	j_barichello@hotmail.com
	LFN Lands Department	867-536-7901	travis.stewart@liardfirstnation.ca
Spills	Yukon Spill Report Centre	867-667-7244	envprot@yukon.ca
	Natural Resource Officer	867-456-3882	watson.mining@gov.yk.ca

7.3 WILDLIFE HEALTH MONITORING

BMC is not proposing to directly monitor the health of wildlife in the Project Area. Direct monitoring would require an annual lethal sampling program, which is ethically questionable and is not supported by the Kaska. Instead, BMC will monitor air, soil, vegetation, and water quality to detect increases in contaminants that may be related to Project activities. Results from these programs can be used to indirectly monitor the health of wildlife in and surrounding the Project site. Methods for each of these monitoring programs can be found in the *Environmental Monitoring, Surveillance, and Reporting Plan* (in progress).

Additionally, information compiled in the wildlife observation log will be analyzed to determine changes in wildlife condition, movement, and use of the Project Area. Other sources that can be used to identify changes to wildlife condition can come from trappers, guide outfitters, and Kaska carrying out traditional activities around the Project. The company will work with genuine interested parties to update this plan as more information is available.

8 ADAPTIVE MANAGEMENT

The mitigation measures and monitoring programs in the WPP will be updated annually throughout the duration of the Project to reflect:

- Results of management reviews;
- Records of non-compliance and/or incident investigations;
- Regulatory or Project-related changes in scope, design, and conditions;
- Technological advances;
- Comments and feedback from Interested Parties;
- Changes to the management of Species at Risk or rare species as a result of updated status reports, recovery strategies, action plans, and management plans;
- Improved understanding of local wildlife (e.g., behaviour, distribution, abundance, movement) from wildlife monitoring programs and studies;
- Analysis of the wildlife observation log and observed wildlife responses to existing management practices; and
- Outputs from the BMC/Kaska Environmental Management Advisory Committee Reviews.

More formalized adaptive management strategies may be applied to site-specific or species-specific situations where Project activities have the potential to interact with focal wildlife and where operational constraints prevent application of the most risk-adverse management practices. The approach applied in these situations will vary on a case-by-case basis but will require the development of a site-specific management plan by a QEP that includes the following general steps:

- Initial site assessment, including field assessment, if required;
- Consideration of relevant Wildlife Key Areas identified by Environment Yukon based on the most recent and available data;
- An ecological rationale for the proposed management strategy;
- Specific actions to mitigate effects to the affected species;
- A monitoring protocol to assess potential effects;
- Specific options to adjust management actions depending on the response of the affected species;
- Documentation of the final outcome of the management strategy and integration of the results into future operational practices; and
- Review by the BMC/Kaska Environmental Management Advisory Committee

These steps are consistent with the adaptive management process cycle: (1) assess the problem, (2) design the plan, (3) implement the plan, (4) monitor the results, (5) evaluate the outcomes, and (6) adjust practices (Duinker and Trevisan 2003).

Table 8-1 provides a summary of the monitoring program triggers for corrective action and the proposed corrective actions. If any of these triggers are exceeded, new methods to minimize the Project's effects on wildlife will be developed with input from YG and Kaska.

The company will also offer to meet with interested parties annually to report on and review the mitigation measures outlined in this WPP. The annual meeting will also provide advance notice of Project activities for the upcoming year to other resource users and provide them with an opportunity to voice their comments or concerns. BMC will also continue to monitor and review mitigation and management strategies that are being carried out elsewhere to conserve biodiversity and combat climate change. Strategies to assist with biodiversity adaptation to climate change may include reducing threats, additional monitoring and studies, modelling, relocation, and improved integration and coordination between all parties interested in and responsible for conservation.

In addition, the following actions will be taken to facilitate adaptive management practices:

- The Environmental Department will make recommendations to the management team about additional procedures, measures, or changes to existing protocols that may assist in further mitigating potential effects on wildlife;
- Recommendations gathered by the site Environmental Department through liaising with Kaska, Environment Yukon, and communities will be incorporated as appropriate; and
- The local Conservation Officer will be notified of all wildlife incidences at site. The site Environmental Department will discuss the Conservation Officer's recommendations into site practices and update the WPP as needed.

Internal auditing will ensure that the WPP is adhered to and will include the following:

- Wildlife observation reports and incident reports will be compiled and reviewed regularly to identify and implement required corrective actions;
- Annual review of monitoring data and incident reports to determine if modifications are required to the WPP through the adaptive management plan;
- Quarterly review of site inspection records including, but not limited to, waste storage and disposal, security of attractants; and
- Review of employee and contractor recommended modifications to improve wildlife protection procedures.

Table 8-1: Wildlife Subcomponents, Monitoring Parameters, Triggers, Corrective Action

Subcomponents	Monitoring Parameters	Triggers	Initial Corrective Action
Finlayson Caribou Herd (FCH)	Habitat - Seasonal distribution surveys; wildlife movement monitoring program.	Reported caribou avoidance at distances greater than 3 km from the Project Area (decreasing trend in the abundance of caribou observations at varying distance beyond 3 km of expected effects from the Project infrastructure based on year on year analysis of densities at varying distance from the Project and relative to suitable habitat(Polfus et al. 2011).	Review Mine activities potentially causing more disturbance than anticipated, identify potential options. Also discuss with Conservation Officers, Regional Biologists, and Kaska as to whether any additional mitigation measures are needed. Further corrective action options could include additional studies during the Project life cycle, more stringent seasonal restrictions on operations and access.
	Movement - Aerial surveys; wildlife movement monitoring program; wildlife records program and incident report.	Changes in FCH distribution from aerial surveys. (change in distribution based on year on year analysis of distribution of groups and individuals relative to the Project Area; and review of the number and types of caribou encounters and incidents over time.)	Check if reduction of sightings is due to reduced reporting and strengthen records program. If the root cause is traffic, traffic patterns could be modified to allow for longer periods without traffic during movement periods.
	Mortality - Wildlife records program; facility monitoring; YG large-mammal collision records on Yukon highways.	Caribou injury or mortality recorded.	Investigate root cause (including discussions with Conservation Officers, Regional Biologists, and Kaska) and consider adjustment to access controls, egress structures, signage, speed, training, and/or enforcement.
	Health condition - Wildlife records program	Reports of poor condition of caribou that appear to have a connection to the Project, based on aerial surveys, outfitters, trappers, personnel, or contractors.	Investigate root cause by reviewing soil, water and air quality emission data, other activities not related to the Project. Mitigate the source of the problem.
Little Rancheria Caribou herd	YG large-mammal collision records on Yukon highways.	Increasing trend over time in YG caribou collision records for the Little Rancheria herd .	Discuss with YG on further mitigation options to reduce road effects on the Little Rancheria herd.
Moose	Habitat - Moose distribution from early and late winter aerial ungulate surveys; wildlife movement monitoring program.	Moose not using areas more than 3 km from Project. Reported avoidance greater than 3 km from Project.	Review Mine activities potentially causing more disturbance than anticipated, identify potential options. Also discuss with Conservation Officers, Regional Biologists, and Kaska as to whether any additional mitigation measures are needed.
	Movement - Aerial surveys	Changes in moose distribution from aerial surveys. (change in distribution based on year on year analysis of distribution of groups and individuals relative to the Project Area; and review of the number and types of moose encounters and incidents over time.)	Check if reduction of sightings is due to reduced reporting and strengthen records program.
	Mortality - Wildlife records program; facility monitoring; YG large-mammal collision records on Yukon highways.	Moose injury or mortality recorded.	Investigate root cause (including discussions with Conservation Officers, Regional Biologists, and Kaska) and make adjustment to access controls, egress structures, signage, speed, training, and/or enforcement.
	Health condition - Wildlife records program.	Reports of poor condition of moose from aerial surveys, outfitters, trappers, personnel or contractors that appear to have a connection to the Project.	Investigate root cause by reviewing water and air quality emission data, external activities. Mitigate root cause.
Grizzly Bear (and Black Bear)	Habitat - Wildlife records program; Incidental sightings during aerial surveys.	Increasing or decreasing trend in the number of observations over time.	Investigate root cause (including discussions with Conservation Officers, Regional Biologists, and Kaska) and make modifications to mitigation measures if Project is the cause and if necessary.
	Habitat – Pre-disturbance bear den surveys.	Mine operations and other activities planned within the bear denning period from October 15 to May 15.	Pre-disturbance bear den surveys will be conducted weekly within 2 km of planned winter and early spring work sites. Apply spatial buffers and prepare a site-specific management for all active dens.
	Movement - Wildlife records program.	Decreasing trend in the number of observations in records over time.	Check if reduction of sightings is due to reduced reporting and strengthen records program.
	Mortality - Wildlife incident reports in wildlife records program; facility monitoring.	Grizzly bear - human conflict reported or mortality recorded	Investigate root cause and carry out corrective action which could include measures such as better enforcement of waste or hazardous materials management, better training, better control structures.
	Health condition.	Reports of poor condition of bears from aerial surveys, outfitters, trappers, personnel, or contractors that appear to have a connection to the Project.	Investigate root cause by reviewing water and air quality emission data, external activities. If information and data indicate a need, cooperate with regional health tracking programs with government or Northern Contaminants Program or similar.

Subcomponents	Monitoring Parameters	Triggers	Initial Corrective Action
Grey Wolf	Prey availability – ungulate aerial surveys; Wildlife records program; wildlife movement monitoring program.	Ungulate’s distributions have changed. Wolf missing from incidental observations during aerial surveys. Grievances or comments from trapline holders or Kaska community members.	Investigate root cause and discuss with Conservation Officers, Regional Biologists, and Kaska as to whether any additional mitigation measures are needed. Check for wolf more intensively during next scheduled aerial survey.
	Mortality - Wildlife records program; facility monitoring	Recorded incidents of injuries or fatalities.	Investigate root cause and carry out corrective action which could include measures such as better enforcement of waste or hazardous materials management, better training, better control structures.
	Health condition - Wildlife records program	Grievances or comments from trapline holders or Kaska community members.	Investigate root cause by reviewing water and air quality emission data, external activities. If information and data indicate a need, cooperate with regional health tracking programs with government or Northern Contaminants Program or similar.
Wolverine and other Small Mammals	Habitat disturbance - incidental observations during aerial surveys; tracking surveys; Wildlife records program	Expected species missing from incidental observations during aerial surveys or in records. Species noted during baseline is not recorded in snow tracking survey. Grievances or comments from trapline holders or Kaska community members.	Check for missing species more intensively during next scheduled aerial survey. Expand snow tracking survey lengths and frequency to determine extent of change in relative abundance. If actual change is suspected, investigate root cause and determine if and what remedial measures are required. Depending on the cause, measures could include changes to the reclamation program revegetation species or methods. Discuss with Regional Biologists and Kaska to further assess root cause.
	Mortality - Wildlife records program; facility monitoring	Recorded incidents of injuries or fatalities.	Investigate root cause and carry out corrective action which could include measures such as better enforcement of waste or hazardous materials management, better training, better control structures.
	Health condition - Wildlife records program	Grievances or comments from trapline holders or Kaska community members.	Investigate root cause by reviewing water and air quality emission data, external activities. If information and data indicate a need, cooperate with regional health tracking programs with government or Northern Contaminants Program or similar.
Birds	Habitat - breeding birds survey	Relative abundance and species richness reduced from baseline in survey areas.	Investigate root cause. Potential corrective actions could include adjusting activity locations and schedules, adjusting the reclamation program.
	Mortality - Wildlife records program; facility monitoring	Reported injuries or fatalities.	Investigate root cause of mortality and determine corrective action if necessary. Additional measures could include changing access controls, adding deterrents, changing the reclamation program.
	Health - breeding bird surveys; wildlife records program	Qualitative - no observable deterioration of physical condition.	Investigate root cause by reviewing water and air quality emission data.
Waterfowl	Habitat - Waterfowl surveys of total counts from standardized locations	Relative abundance lower than baseline around Fish Offset Ponds and post-closure wetland habitat.	Adjust monitoring frequency and locations to better assess use. Make adjustments to the restoration program vegetation species and habitat complexity to improve abundance and diversity.
	Mortality - Wildlife records program; facility monitoring	Noted injuries or fatalities directly attributed to Mine activity.	Investigate root cause and determine corrective action if necessary. Additional measures could include changing access controls, adding deterrents, changing the reclamation program.
	Health - waterfowl surveys; wildlife records program	Qualitative - no observable deterioration of physical condition.	Investigate root cause by reviewing water and air quality emission data.

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APPENDIX A: CORPORATE POLICIES

Environment Policy

BMC Minerals Ltd (“BMC” or the “Company”) recognises that there is a fundamental requirement to conduct the Company’s activities in an environmentally responsible and ethical manner with due regard to the legacy of our actions.

In order to achieve our environmental objectives, the Company shall use an Environmental Management System with performance monitoring utilising various tools including inspection and formal project audit protocols.

The Company is committed to:

- Minimising the environmental footprint of our operations as far as is practicable;
- Establishing environmental programmes based upon risk assessments that set and review environmental targets and objectives;
- Developing and implementing sound management systems designed to minimise pollution whilst supporting the Company in meeting or exceeding the specified environmental targets and objectives for each project;
- Ensuring that local communities and stakeholders are considered when developing project systems;
- Ensuring that heritage sites are recognised, managed and protected as a fundamental part of our environmental culture;
- Integration of environmental issues into site inductions, training and ongoing workplace communication processes and procedures;
- Regularly evaluating and reviewing subcontractor and supplier environmental performance;
- Promoting the efficient use of energy and continually improving our processes to minimise waste so as to minimise waste and conserve natural resources;
- Encouraging continual improvement in environmental performance through establishment of planning, training, monitoring, inspection and reporting systems;
- Ensuring that exploration and mine closure and reclamation outcomes target the establishment of self-sustaining ecosystems.

All Employees have the shared responsibility to:

- Comply with project environmental conditions as communicated through the induction and ongoing communications;
- Support continual improvement of project environmental performance; and
- Communicate any environmental incidents and actively participate in rectification.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in blue ink, appearing to read 'Scott Donaldson'.

Scott Donaldson

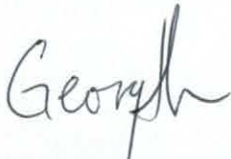
Chief Executive Officer Date: 31st July 2020

No Firearms Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") is committed to implementation of Health and Safety Policies and supporting Safety Management System procedures to provide a safe working environment for all employees and contractors. As such BMC will enforce a No Firearms Policy which includes the following:

- All firearms are prohibited at the BMC Minerals (No. 1) Ltd, Kudz Ze Kayah site unless otherwise authorized by BMC Management.
- Firearms are to only be used for the protection of personnel and property in the event of dangerous wildlife.
- All hunting of wildlife or recreational shooting is strictly prohibited.
- All authorized firearms at the Kudz Ze Kayah Project site are under direct control of the BMC Management or an employee(s) designated by BMC Management.
- As described in the *Yukon Occupational Health and Safety Regulations*; "any worker who is required to use, handle or otherwise have control of a firearm shall:
 - have successfully completed the Canadian Firearms Safety Course, given by an instructor who is designated by a chief firearms officer, and
 - have demonstrated proficiency with that firearm to the employer."
- Every designated employee who handles firearms in the course of their duties, must hold a valid Federal Firearms Possession License with non-restricted acquisition privileges.
- All firearms must be handled and stored in accordance with the federal *Firearms Act*. This includes, but is not limited to, locking mechanisms on all firearms when not in use and proper storage of ammunition.

This policy shall be supported by appropriate standards, procedures and programs that are designed to achieve the policy objectives.

A handwritten signature in black ink that reads "George".

George Smith

Date: 1 November 2016

Director



BMC Minerals (No.1) Ltd

No Feeding of Animals Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") respects the natural environment and takes its environmental stewardship responsibilities seriously. BMC recognises that there is a fundamental requirement to conduct the Company's activities in an environmentally responsible and ethical manner with due regard to the legacy of our actions. As such the Company has a strict *No Feeding of Animals Policy* to ensure the following:

- Local fauna experience minimal impact from the Company's activities.
- Animals do not become reliant or dependant on human feeding.
- Wildlife maintains a natural diet.
- Wildlife does not become a nuisance factor in operations through human intervention.
- Wildlife does not impact on a safe and healthy working environment for all employees and contractors.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.

A handwritten signature in black ink that reads 'George Smith'.

George Smith

Date: February 2019

Director

No Recreational Use of All-Terrain Vehicles and Snowmobiles Policy

BMC Minerals (No.1) Ltd ("BMC" or the "Company") is committed to minimizing the environmental footprint of our operations and providing a safe working environment for all employees and contractors. As such BMC will enforce a No Recreational Use of All-Terrain Vehicles (ATVs) and Snowmobile which includes the following:

- Recreational use of ATVs and snowmobiles is prohibited at the BMC's Kudz Ze Kayah site.
- Use of the tote road to access recreational areas for ATVing and snowmobiling is strictly prohibited.

This policy shall be supported by appropriate standards, procedures and programs that are designed to achieve the policy objectives.

A handwritten signature in black ink that reads "George".

George Smith

Date: 1 November 2016

Director

No Hunting – No Fishing Policy

BMC Minerals Ltd (“BMC” or the “Company”) understands and respects that local First Nations rely upon fish, wildlife, and other resources within their traditional territories as a food source, and to sustain social and cultural traditions.

BMC’s site policies and practices are designed to ensure that its mineral exploration and mining activities don’t adversely affect the abundance of fish and wildlife in the region of its projects: and that the presence of Company personnel and its contractors on its sites do not place additional burden on these resources.

All employees, agents, contractors, and consultants of BMC who have accessed First Nations traditional territories as a result of a contract to perform services on the Company’s projects are prohibited from utilising that access for the purpose of hunting or fishing.

This restriction does not apply to BMC employees, agents, contractors and consultants who as residents of nearby communities may participate in their customary practice of hunting and fishing in their territory during their rostered time away from the site.

This policy shall be supported by appropriate standards, procedures and programmes that are designed to achieve the policy objectives.



George Smith
Director

Date: November 1, 2023

APPENDIX B:

PRE-DISTURBANCE BREEDING BIRD SURVEYS PROTOCOL

Protocol

Pre-Disturbance Breeding Bird Surveys

(Version 2 – February 2024)

Introduction

The *Migratory Birds Convention Act* (Government of Canada 1994) and its regulations provide protection for migratory birds, their eggs and nests, and their habitats. The Act and its regulations prohibit the incidental take (unintentional destruction) of migratory birds, their eggs, or active nests. Some groups of species not protected under the *Migratory Birds Convention Act* such as raptors, corvids, and grouse are protected in a similar manner under the Yukon's *Wildlife Act* (Government of Yukon 2002) and *Wildlife Regulation* (Yukon Government 2012a). Species at risk are also afforded additional protections under the *Species at Risk Act* (Environment and Climate Change Canada 2022). BMC Minerals Ltd. (BMC) is committed to adhering to federal and territorial legislations to protect breeding birds, their nests, and eggs anywhere they are found on the Project, including previously disturbed areas.

The primary protection mechanism for breeding birds within the Project area will be to plan and conduct land and vegetation clearing activities outside the breeding bird season to the extent possible. By doing so, scheduled works will avoid most risks of harm, harassment, or accidental take of nesting birds and/or their eggs.

However, this is not always operationally feasible given multiple competing priorities including other environmental protection considerations. When land and vegetation clearing activities cannot avoid the breeding bird season, a QEP or an experienced observer under the supervision of a QEP will conduct pre-disturbance breeding bird surveys. An "experienced observer" is defined as an individual experienced in conducting breeding bird surveys by sight and sound and with extensive knowledge of the breeding bird assemblages present in the relevant ecosystems. The purpose of these surveys is to detect the presence of breeding birds, and potentially their nests, within and in the vicinity of the affected areas prior to the commencement of clearing activities and to protect identified sites from clearing activities and associated disturbance until breeding activities have ended.

Federal and Territorial Legislation

The following federal and territorial acts and regulations provide protection for migratory birds, their eggs, and nests:

Federal statutes:

- *Migratory Birds Convention Act* (Government of Canada 1994)
 - *Migratory Birds Regulations* (Government of Canada 2018)
- *Species at Risk Act* (Government of Canada 2002)

Territorial statutes:

- *Wildlife Act* (Government of Yukon 2002)
 - *Wildlife Regulation* (Yukon Government 2012)

Best Management Practices, Standards, and Guidelines

The following best management practices and guidelines were considered in the development of this protocol:

- Habitat Protection Guidelines for Yukon Raptors, ver. 2011 (EDI Environmental Dynamics Inc. 2011)
- Yukon Forest Resources Act: Wildlife Features Standard (Yukon Energy Mines and Resources 2014)
- Guidelines to Avoid Harm to Migratory Birds (Government of Canada 2023)
 - <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html>
- General Nesting Period of Migratory Birds (ECCC 2023)
 - <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods.html>

Applicable Nesting Periods

The Kudz Ze Kayah Project area intersects bird nesting zone B8 of the Bird Conservation Region 4 – Northwestern Interior Forest. The breeding bird season for Zone B8 is as follows (ECCC 2023):

- Wetland ecosystems: 10 May to 10 August;
- Open ecosystems: 5 May to 21 August; and,
- Forest ecosystems: 5 May 13 August

The nesting timing windows for the broad ecosystems listed above will be followed when pre-disturbance breeding bird surveys are required ahead of land clearing activities. Variation can occur year to year in nesting periods and pre-disturbance surveys will adapt to on-site changes to annual bird nesting activity.

Study Areas

The following study areas will be selected for pre-disturbance breeding bird surveys:

- In most cases, the study areas will be based on a 30 m radius buffer from the perimeter of areas to be cleared to protect any breeding birds that may be nesting along the edge of the work site.
- At locations where bird species at risk are detected with the initial point count (see methods section) or at locations where species at risk were previously documented (i.e., during baseline studies or incidentally), and survey personnel deem that these species may be nesting within

the affected ecosystem, study areas will be based on a 100 m radius buffer from the perimeter of areas to be cleared.

- For short duration and low disturbance clearing activities in simple ecosystems such as vegetation clearing for narrow geophysical survey lines in alpine and subalpine ecosystems, study areas will be based on a 5 to 10 m radius buffer from the affected area.
- For potential scenarios not considered above, the radius buffers for study areas will be selected based on the advice of a QEP.

Methods

Pre-disturbance breeding bird surveys will only be completed in suitable weather conditions which includes calm to light winds, no precipitation, above freezing temperatures, and good visibility (Table 1). If conditions do not meet these criteria or if a drastic change in breeding bird behaviour occurs coincidentally with a change in weather, surveys will be delayed or postponed until suitable conditions occur. Conducting breeding bird surveys in suitable weather conditions maximizes bird detections and minimizes the effects of disturbance from the survey on breeding birds and their young.

Table 1. Guidelines for suitable and unsuitable weather conditions during pre-disturbance breeding bird surveys.

Weather Parameter	Suitable	Unsuitable
Wind	-Beaufort 0 (<2 km/hr), calm -Beaufort 1 (2-5 km/hr), light air -Beaufort 2 (6-12 km/hr), light breeze, leaves rustle	-Beaufort 3 (12-19 km/hr), gentle breeze, leaves and twigs constantly move -Beaufort 4 or greater (>20 km/hr)
Precipitation	-None -Light fog -Misty drizzle	-Heavy fog -Light rain -Hard rain -Snow
Temperature	>3°C	<3°C

Pre-disturbance breeding bird surveys will be scheduled to coincide with the dawn chorus when birds most regularly perform territorial singing and are most active (Ralph et al. 1993). At the latitude of the Project, birds sing throughout the night and dawn chorus occurs over an extended period. Daily survey periods will begin 30 minutes before sunrise and stop when the morning chorus diminishes, typically between 9:00 and 10:00 AM depending on weather conditions and stage of the breeding season.

The initial stage of the pre-disturbance breeding bird surveys will follow modified point count survey methods (Ralph et al. 1995, Resources Inventory Committee 1999b, Matsuoka et al. 2014). The point count will be conducted from a fixed location near the center of the study area that provides good visibility and/or that ensures adequate coverage of vegetation communities present in the study area. Multiple point counts may be required to fully survey large study areas or at locations with complex ecosystems. Generally, approximately one point count will be required for every 3 hectares of study area. For breeding bird surveys, point count stations are generally spaced a minimum of 400 m apart to avoid duplicate counts of loud birds (Resources Inventory Committee 1999b). However, given the

purpose of these surveys (i.e., pre-disturbance), point count locations may be located as close as 200 m apart. The location of all point counts will be recorded using a Garmin GPS (NAD83).

When arriving at the point count location, observers will take care to minimize disturbing birds in the vicinity of the area to be surveyed. Once at the survey location, observers will use a 2-minute minimum quiet period to record general information about the site to allow any birds that were disturbed by the observer's arrival to resume their activities. Point counts will use a 10-minute detection period and an unlimited recording distance. During this period, all birds detected by sight or sound during the 10-minute detection period will be recorded on a standard point count map form with concentric distance rings (Figure 1). Ecosystem types within 100 m of the centre of the plot will be mapped on the survey form. Data will be recorded by plotting the location of all birds on the form using their standard four-letter Alpha Codes (i.e., standardized species name abbreviations) following the 59th American Ornithological Society's Supplement (Chesser et al. 2018). Additional information about sex, age, number, behaviour, movements, and ecosystem associations for each observation will be added to the mapped locations using pre-defined codes.

The second stage of the pre-disturbance breeding bird surveys will consist of a combination of slow walking and stand watch search of the study area. Regular stops to scan for birds and breeding behaviours will be performed throughout the survey. The search patterns used will be selected based on topography, ecosystem complexity, sightlines, and bird species assemblage of the study area. Wherever possible, systematic transects equally spaced 10 to 15 m apart will be surveyed. However, meandering transects of roughly equal spacing, a survey grid, or a combination of these search patterns may also be used for surveys.

Observers will focus their efforts on searching for and observing breeding bird behaviours. These behaviours include courtship displays, agitated behaviour, alarm and contact calls, distraction displays, flushing and returning to the same area, carrying nest material, food, or fecal sacs, signs of breeding including eggshells and whitewash on trees or leaves. These behaviours can be used to confirm the presence of a nest and estimate its location. When observers detect evidence of breeding activities or behaviours, they will watch from an appropriate distance using binoculars to estimate the centre of breeding activities and behaviours which generally corresponds to the nest location.

If an active nest is detected or breeding bird behaviour is observed, observers will record the following information: date, time, coordinates (Garmin GPS), species, details of the breeding behaviour and/or evidence of nesting observed, nesting stage (e.g., eggs, estimated age of nestlings), duration of observed behaviours, a description of surrounding ecosystems, ID numbers of any photos taken, and detailed information about the mitigation measures applied (e.g., no-disturbance buffer size, ribbon colour, and estimated duration of no-disturbance buffer requirements).

On-survey navigation and track recording of survey coverage will be completed using a Garmin GPS and an iPad using the Avenza Maps software (NAD83). This will ensure observers complete adequate spatial coverage of study areas and increase efficiency by minimizing duplicate coverage.

Data Management and Reporting

After each survey, a quality assurance and control review of the day's forms will be conducted to detect errors, omissions, and legibility issues and correct them as required. The data will then be transferred to a point count summary form to simplify data entry into an electronic database. Following the completion of the field surveys, all data forms and field notes will be scanned and saved into an electronic format.

After the end of the breeding season, a memo summarizing the methodology and results of the surveys will be completed and kept on file by BMC. If requested, a copy can be forwarded to the Canadian Wildlife Service and/or Environment Canada and Climate Change as evidence that appropriate mitigative actions were taken to minimize Project effects to migratory birds, their nests, and eggs.

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Figure 1. Example form for point count surveys.

Point Count Form-Songbirds

Project _____ Location _____ Stratum/Trans _____ UTM _____ Surveyors _____

Obs Date ____/____/____ Time: Strt _____ End _____ Ceil _____ CC _____ Wind _____ Precip _____ Tmp _____

Habitat 1: Eco Area _____ Eco unit _____ Str Stg _____ CanCl _____ Ht _____ DBH _____

Trees _____ Shrubs _____ % _____ Comm _____

Habitat 2: Eco Area _____ Eco unit _____ Str Stg _____ CanCl _____ Ht _____ DBH _____

Trees _____ Shrubs _____ % _____ Comm _____

Comments: _____

Songbirds		FORBS		GROUND-SHRUBS	
100	100	100	100	100	100
90	90	90	90	90	90
80	80	80	80	80	80
70	70	70	70	70	70
60	60	60	60	60	60
50	50	50	50	50	50
40	40	40	40	40	40
30	30	30	30	30	30
20	20	20	20	20	20
10	10	10	10	10	10

Unusual Bird Sp. Codes		Wind Code		Structural stage	
WNP	Western Wood-Peeper	0	<2 km/h	1	<5% vegetated
GRAJ	Gray Jay	1	2-5 km/h	2	Sparse/cryptogram
BLPW	Blackpoll Warbler	2	6-12 km/h	2a	5-10% vegetated
BLBW	Blackburnian Warbler	3	13-19 km/h	2b	Reveal
CONM	Connecticut Warbler	4	20-29 km/h	2c	Lichen
YENA	Yellow Warbler	5	30-39 km/h	3	Herb
		6	40-49 km/h	3a	Forb-dominated
		7	50-59 km/h	3b	Graminoid-dominated
				3c	Aquatic
				3d	Dwarf shrub
				4	Shrub
				4a	Tall shrub
				4b	Low shrub
				5	Pole sapling
				6	Young forest
				7	Mature forest
				8	Old forest

Playback Spp: _____

Response: Y / N _____

APPENDIX C:

WILDLIFE OBSERVATION AND INCIDENT REPORTING FORMS

BMC Minerals Ltd.

750 -789 West Pender Street, Vancouver, BC V6E 4A4

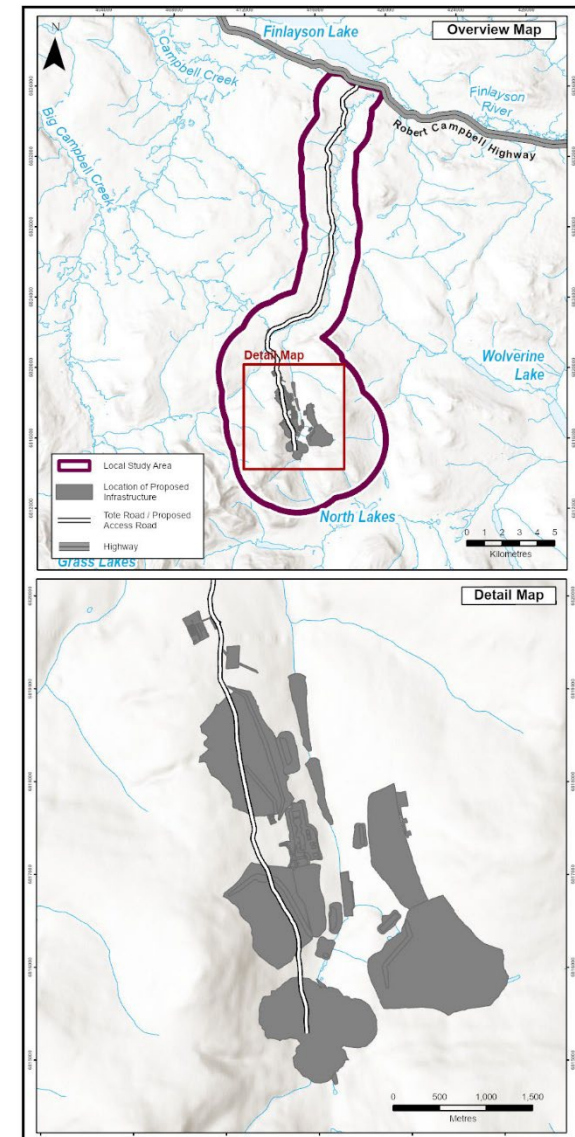
WILDLIFE OBSERVATION FORM

Each time wildlife, wildlife sign (e.g., tracks, scat), or wildlife habitat features (e.g., dens, nests, mineral licks, etc.) are observed by BMC personnel or contractors, the observation will be reported in writing on the following Wildlife Observation Form and submitted to the Environmental Department.

BMC Minerals Ltd.

750 -789 West Pender Street, Vancouver, BC V6E 4A4

Kudz Ze Kayah Project: Wildlife Observation and Monitoring Form		
Date:	Observer:	
Company:	Sited from: ☐ Ground ☐ Air	
Observation Type: ☐ Incidental ☐ Work Activity		
Work Activity: ☐ Road Operations ☐ Mine Operations ☐ Aircraft Operations ☐ Camp ☐ Active Work Sites ☐ Land Clearing ☐ Other: _____		
Wildlife Species: _____ Number: Total: _____ Adult: _____ (M/F: ____/____) Young: _____ Details (e.g., sign, habitat feature, behaviour): _____		
Applied Mitigation: _____		
Behavior / Behavioral Response: _____		
Mitigation Effectiveness: _____		
Location: ☐ Access Road / Road km: _____ ☐ Mine ☐ Camp ☐ Trails ☐ Other _____ UTM: Z: _____ East: _____ North: _____ Latitude: _____ Longitude: _____ Distance and Direction to Animal: _____ Location Description: _____		
Habitat: ☐ Forest: Conifer / Mixed / Deciduous ☐ Wetland ☐ Shrubs ☐ Stream ☐ Alpine: shrub / grass / rock ☐ Cliffs ☐ Road/Trail ☐ Clearing ☐ Drill Pad ☐ Camp ☐ Other: _____		
Comments: _____		
Submit all forms to your supervisor or Project Manager.		



BMC Minerals Ltd.

750-789 West Pender Street, Vancouver, BC V6C 1H2

WILDLIFE INCIDENT REPORT

Each time a wildlife incident is observed by BMC personnel or contractors, it must be reported to the Site Environmental Manager immediately or at the end of the shift. An incident report will be completed by the Site Environmental Manager within 24 hrs of the incident occurring.

INCIDENT REPORT FORM
GENERAL INFORMATION
Employee/Contractor Name:
Date/Time of Incident:
Reported Incident to (Site Environmental Manager Name):
Date of Report:
Work Activity: (Road Operations, Aircraft Operations; Camp; Mine Operations; Land Clearing, Active Work Site; Other)
DETAILS OF INCIDENT
Wildlife Species:
Number of Species:
Incident Type (i.e. vehicle collision, near miss, encounter nuisance/problem interaction, or other). If vehicle involved specify type (truck, ATV, side-by-side, heavy equipment, aircraft or helicopter):
Location (i.e. GPS location, road km, camp, or mark location on the attached map etc):
Incident Outcome (i.e. injury, mortality, defensive behaviour, no injury, management action or other):
Description of Incident and Outcome:
Activity of wildlife before incident:
Type of Habitat (i.e. road, camp, subalpine shrubs, forest, wetlands, etc):
Could the incident have been prevented? (yes, no, uncertain):
If yes, describe how:

BMC Minerals Ltd.

750-789 West Pender Street, Vancouver, BC V6C 1H2

MANAGEMENT REVIEW AND REPORT DISTRIBUTION FORM

MANAGEMENT REVIEW

Completed By:

Signature:

Date:

COPIES OF REPORT SENT TO (YES OR NO)

Yukon Environment:

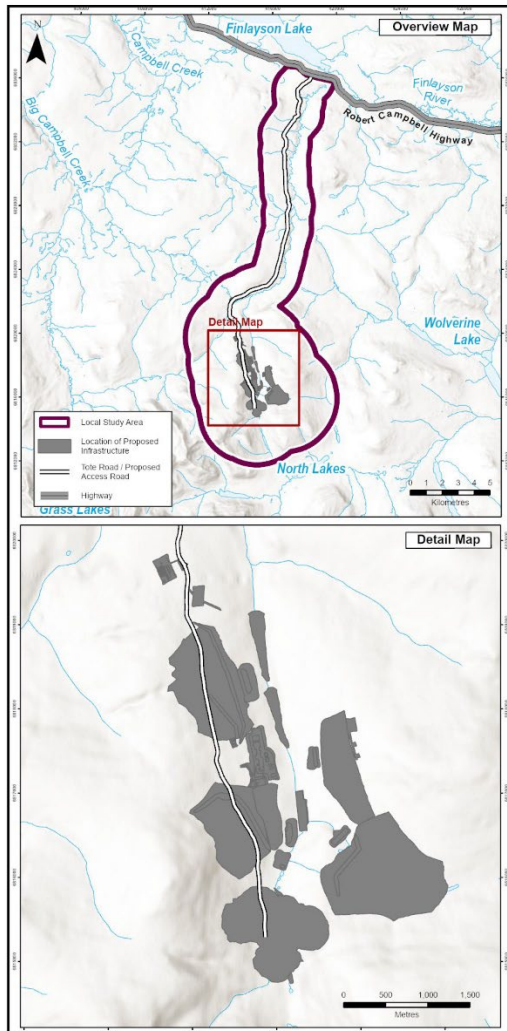
Yukon EMR:

Conservation Officer:

Ross River Dena Council:

Liard First Nation:

Note: If a wildlife mortality occurs along the access road, it must be reported to Conservation Officer Services – Ross River District Office (as per the Access Road Lease – 105G07-001).



APPENDIX D:

PRE-DISTURBANCE BEAR DEN SURVEY PROTOCOL

Protocol

Pre-Disturbance Bear Den Surveys

(Version 1 – February 2024)

Introduction

Grizzly bears are designated Special Concern under Schedule 1 of SARA (Government of Canada 2022) and are ecologically and culturally important. The Yukon Government and its partners developed a conservation management plan for grizzly bears in the Yukon (Yukon Grizzly Bear Conservation and Management Plan Working Group 2019).

Hibernation is a key aspect of grizzly bear life history and ecology. It is essential for conserving energy and reducing metabolic costs during periods of scarce food resources and unfavourable weather. Disturbance of hibernating grizzly bears has been documented to reduce females' reproductive success (Swenson et al. 1997), and den abandonment has been linked to a greater probability of death for dependent offspring (Linnell et al. 2000). This is especially true of bears near (≤ 1 to 2 km) road development (Linnell et al. 2000).

Pre-disturbance grizzly bear den surveys will be conducted to support winter and early spring Project activities at active work sites. The objective of the surveys is to locate grizzly bear dens within 2 km of potential winter and early spring work sites, and if any dens are detected, to prevent over-winter disturbance of hibernating bears as per the commitments outlined in the *Kudz Ze Kayah Project – Wildlife Protection Plan* (BMC Minerals Ltd. 2022).

Study Area

The study area will be based on a 2 km radius buffer from proposed winter and early spring work sites where Project activities such as blasting, drilling, and earthworks could potentially disturb or excavate the den of hibernating bears.

Methods

Prior to conducting the surveys, we will identify areas of potential denning habitat within the study area through a simplified denning habitat model approach. This analysis is not meant as a comprehensive grizzly bear denning habitat suitability model but rather as a simple guide to ensure that potential denning habitat in the study area is well covered on each survey. We will use the Canadian Digital Elevation Model from Natural Resources Canada to estimate the value of three denning habitat variables: elevation, aspect, and slope (Government of Canada, Natural Resources Canada, Canada Centre for Mapping and Earth Observation, accessed April 2020; <https://maps.canada.ca/czs/index-en.html>). The denning habitat suitability of each terrain variable will be defined conservatively by selecting a broader range of values for each attribute than those measured at grizzly bear dens by Miller et al. (1982) and by EDI Environmental Dynamics Inc. from bear den survey programs conducted in spring 2020 and spring 2023 (EDI Environmental Dynamics

Inc., unpublished data). Both datasets are from grizzly bear studies conducted in the Mackenzie Mountains along the Yukon-Northwest Territories border which are the most extensive den location datasets available from a geographic region similar to the Pelly Mountains. The suitability of each terrain characteristic as potential denning habitat will be defined using the criteria identified in Table 1. The model will be developed by combining habitat factors using a weighted geometric mean model. This approach reflects the limiting factor concept in which a deficit in one factor cannot be compensated by a high score in another factor. The weighted geometric mean gives absolute influence to habitat suitability scores of 0 in the model output. Therefore, total model scores will be either 0 (non-suitable) or 1 (potentially suitable).

Table 1. Range of values for terrain attributes used by grizzly bears in the Mackenzie Mountains and Habitat Suitability Model criteria used to guide pre-disturbance grizzly bear den surveys for the Kudz Ke Kayah Project, BMC Minerals Ltd.

Terrain Attribute	Range of Values Used by Bears in the Mackenzie Mountains		HSI Model Criteria	Suitability
	Miller et al. 1982 ¹	EDI Internal Data ²		
Elevation	1402 – 1829 m	1355-1840 m (Avg. 1607 m)	1350 – 1850 m	1
			< 1350 m and > 1850 m	0
Slope	31° – 38°	20° – 50° (Avg. 32°)	20° – 40°	1
			< 20° and > 40°	0
Aspect	78.75° – 236.25°	65° – 337° (Avg. 171°)	56.25° – 236.25°	1
			< 56.25° and > 236.25°	0

¹ Miller, S.J., Barichello, N., and Tait, D. 1982. The grizzly bears of the Mackenzie Mountains, Northwest Territories. Completion Rep. No. 3. NWT Wildlife Service, Yellowknife, NWT. 118 pp. (Miller et al. 1982). Data measured at the den sites.

² EDI Environmental Dynamics Inc. unpublished data from grizzly bear den surveys conducted in the Mackenzie Mountains in spring 2020 and 2023. Values for each attribute were extracted from the Canadian Digital Elevation Model raster cell overlapping the observation location in a GIS and are therefore subject to error because of the model's accuracy.

There is substantial variation in the phenology and chronology of denning within and between grizzly bear populations, which depend on the weather (Pigeon et al. 2016), latitude (Fowler et al. 2019), and physical attributes of the bears, such as fat reserves, sex, and reproductive status (Pigeon et al. 2016). The difference between the start and end of the denning and den emergence periods (excluding outliers) can be more than one month. In general, grizzly bears tend to enter their dens between mid-October and mid-November and emerge from their dens between mid-April and mid-May (Miller et al. 1982, McLoughlin et al. 2002, EDI Environmental Dynamics Inc. 2018). Therefore, bear denning surveys will be scheduled based on the onset of winter weather and snow conditions in any given year so that surveys correspond as best as possible with the timing of grizzly bear denning. Grizzly bear den surveys will generally be conducted between mid-October to mid-November. Aerial surveys will be repeated weekly through the denning period until winter conditions are such that most bears are presumed to be in their dens. This will ensure that most dens present in the survey area are detected during the surveys.

The surveys will be conducted by one crew using a helicopter (Eurocopter A-Star variants). The survey personnel will consist of the pilot, a navigator, a primary observer (behind the navigator), and a secondary observer (behind the pilot). Survey flight lines will follow constant elevation contours unless

otherwise determined by changes in terrain or topography. Flight direction will be selected to place mountain slopes on the side of the navigator and primary observer. This will maximize survey coverage on the slopes with highest potential for bear den presence, while the secondary observer covers areas downslope. Flight elevation will be approximately 60-90 m above ground level at speeds of approximately 70-110 km/hr while on survey; however, flight elevation and speed will be adjusted based on terrain and wind conditions to maximize bear track and den detections and for personnel safety considerations.

All areas below high alpine areas and above tree line within the study area, generally corresponding to areas of potential habitat suitability identified by the model, will be systematically surveyed for evidence of denning. Areas considered to have low suitability grizzly bear denning habitat will be surveyed at lower intensity (e.g., forested valley floors, low relief plateaus) and areas considered to be unsuitable grizzly bear denning habitat will generally not be surveyed (e.g., high alpine areas, rock escarpments).

Surveyors will search for any indication of bear presence including tracks, diggings, dirt on snow, dens, and bears (e.g., Photo 1). Flight speeds will be reduced when wildlife tracks are detected to confirm species. Where a high density of grizzly bear tracks is detected, these areas will be surveyed at higher intensity to confirm the presence or absence of dens. When a den is located, surveyors will record the location, den characteristics (e.g., excavated, root ball), bear presence, and general habitat characteristics (e.g., slope position, associated vegetation). Data recorded for each bear or incidental wildlife observations will include coordinates, species, number of animals, behavior, terrain, and ecosystem type. To minimize wildlife disturbance, wildlife will not be approached or chased for age and sex classification purposes. Wildlife will be classified by age and sex incidentally in cases where observers can readily classify animals from a distance by eyesight or using binoculars.



Photo 1. Example of a fall/early-winter grizzly bear den excavation and tracks.

On-survey navigation and flight track recording will be completed using a Garmin GPS and an iPad using the Avenza Maps software (NAD83). This will allow the navigator and pilot to track flight lines and aircraft position in real time to confirm adequate spatial coverage and minimize the likelihood of duplicating observations. Wildlife observations, tracks, and habitat features will be recorded with a Garmin GPS (NAD83).

Following the completion of the field surveys, all data forms and notes will be scanned and saved into an electronic format. The data will be entered and compiled in an electronic database.

Literature Cited

BMC Minerals Ltd. 2022. Kudz Ze Kayah Project Wildlife Protection Plan. BMC Minerals Ltd. 56 pp.

Duinker, P.N. and Trevisan, L.M. 2003. Adaptive management: progress and prospects for Canadian forests. pp. 857–892. In P.J. Burton, C. Messier, D.W. Smith, W. Adamowicz (eds.) Towards sustainable management of the boreal forest. NRC Research Press, Ottawa, Ontario.

EDI Environmental Dynamics Inc. 2018. Coffee Gold Project: grizzly bear species account and habitat modelling, version 1.2. Prepared for Goldcorp Kaminak Ltd., a subsidiary of Goldcorp Inc., Whitehorse, Yukon.

Fowler, N.L., Belant, J.L., Wang, G., and Leopold, B.D. 2019. Ecological plasticity of denning chronology by American black bears and brown bears. *Global Ecology and Conservation* 20:e00750. DOI: 10.1016/j.gecco.2019.e00750

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Linnell, J., Swenson, J., Andersen, R., and Barnes, B. 2000. How Vulnerable Are Denning Bears to Disturbance? *Wildlife Society Bulletin* 28:400–413.

McLoughlin, P.D., Cluff, H.D., and Messier, F. 2002. Denning Ecology of Barren-Ground Grizzly Bears in the Central Arctic. *Journal of Mammalogy* 83(1):188–198.

Miller, S.J., Barichello, N., and Tait, D. 1982. The grizzly bears of the Mackenzie Mountains, Northwest Territories. Completion Rep. No. 3. NWT Wildlife Service, Yellowknife, NWT. 118 pp.

Pigeon, K.E., Stenhouse, G., and Côté, S.D. 2016. Drivers of hibernation: linking food and weather to denning behaviour of grizzly bears. *Behavioral Ecology and Sociobiology* 70(10):1745–1754.

Swenson, J.E., Sandegren, F., Brunberg, S., and Wabakken, P. 1997. Winter den abandonment by brown bears *Ursus arctos*: causes and consequences. *Wildlife Biology* 3(1):35–38. Nordic Board for Wildlife Research. DOI: 10.2981/wlb.1997.005

Yukon Grizzly Bear Conservation and Management Plan Working Group. 2019. A Conservation Plan for Grizzly Bears (*Ursus arctos*) in Yukon. Government of Yukon, Department of Environment, Whitehorse, Yukon. 54 pp.

APPENDIX E:

MOOSE EFFECTS MONITORING PROGRAM PROTOCOL

Protocol

Moose Effects Monitoring Survey Program

(Version 1 – February 2024)

Forward

This is a draft effects monitoring survey protocol for moose based on brief survey protocol documents received from Environment Yukon. It may contain inaccuracies and may be incomplete.

Further, the Decision Document for the Kudz Ze Kayah Project (YOR #2017-0083) specifies that the moose monitoring survey program must be designed through collaboration with affected First Nations – this has not been completed to date.

Introduction

As part of the environmental assessment for the Kudz Ze Kayah Project completed under YESAA, BMC Minerals Ltd. (BMC) committed to monitor moose annually by conducting late winter moose abundance and distribution surveys using methods consistent with those used during baseline ungulate surveys from 2015 through 2023 (BMC Minerals Ltd. 2022, 2023). However, the methods used for baseline studies are not suitable to monitor Project effects empirically and to determine if sensory disturbance caused by Project activities on the access road and mine infrastructure during the mine construction and operations phases influence moose distribution.

Although most of the terms and conditions for wildlife found in the Project's Decision Document (YOR #2017-0083) are related to the Finlayson caribou herd, Monitoring Condition E of the Decision Document states:

"That a survey program be instituted to monitor moose during late winter from construction through closure stages of the project. This survey program shall be designed through collaboration with affected First Nations."

Environment Yukon recently developed a new survey methodology and statistical analysis for the purpose of detecting project effects from mines and linear developments on moose distribution (Analythium Solutions 2023). Environment Yukon conducted an analysis using the results from the Rau Road moose surveys (2020 and 2021) conducted near Mayo to confirm the efficacy of the new survey methods to detect Project effects. This analysis successfully demonstrated that the survey method could detect effects from linear project disturbance on moose distribution.

Environment Yukon intends on developing a proponent's guide for the new survey design to distribute to industrial partners. However, Environment Yukon is receptive to other effects monitoring designs developed and proposed by industry.

The objective of the moose monitoring surveys is to monitor late-winter moose distribution and relative abundance during the pre-construction, construction, and operations phases of the Kudz Ze Kayah Project using the methodology developed by Environment Yukon to assess the potential effects

of Project disturbance on moose distribution. The following summarizes BMC's understanding of these survey methods to best inform adaptive management strategies and mitigate Project effects on moose.

Study Area

The study area was produced by applying a 10 km radius buffer to the proposed KZK mine site infrastructure and the access road footprints. The study area was then subdivided into a uniform survey grid comprised of approximately 4 x 4 km blocks (2' latitude x 5' longitude; Figure 1).

This study area overlaps substantially with the Regional Study Area (RSA) used for the baseline early and late winter ungulate surveys conducted for the Project from 2015 to 2023 Project (BMC Minerals Ltd. 2023). The RSA was based on the boundaries of Environment Yukon's Game Management Subzone (GMS) 10-07, which has a total area of 2,063 km² (Figure 1). Environment Yukon uses GMSs for big game population monitoring and harvest management. GMS 10-07 was used as the RSA for the baseline winter ungulate surveys because the Project is located near its centre, and it provided a minimum distance of 10 km in all directions between the Project footprint and the boundary of the study area. Further, since moose was the focus species of these surveys, the data collected could complement and be comparable to other data collected for moose by Environment Yukon.

Methods

We will use a model-based technique developed by the Environment Yukon to survey moose. In terms of its planning and delivery in the field, it is similar to a Stratified Random Block (SRB) survey design used by several jurisdictions to estimate moose populations. However, the analysis of survey results uses regression models to estimate moose abundance over the study area and to detect project effects on moose distribution.

Blocks from the 4 x 4 km survey grid will be stratified into "High", "Probably High", "Probably Low", and "Low" blocks using the results from the 2015 to 2023 late-winter moose surveys conducted for the Project (BMC Minerals Ltd. 2023); high and low blocks representing a high and low likelihood of moose occurrence in the blocks in late winter, respectively.

The design of this survey method is intended by Environment Yukon to require that only 30% of survey blocks be surveyed so that this method can gain broad support and implementation by industry partners. The survey area grid which overlaps the 10 km radius buffer consists of 56 blocks and therefore, the survey design requires that a minimum of 17 blocks be surveyed. The selection of surveys blocks will be as follows:

- All known high blocks with at least 50% of their area within the 10 km buffer;
- Random selection of 50% of probable high blocks that are closest to the road and completely within the 10 km buffer; and,
- Remaining blocks will consist of known low and probable low blocks where half are selected randomly from blocks completely within the 10 km buffer and half are selected based on their intersection with the road.

It is possible that more than 17 blocks may need to be surveyed based on the outcome of the stratification. For example, additional blocks may need to be surveyed if a high proportion of blocks

are assigned to the “High” and “Probably High” survey strata within the study area. Further, the more blocks are surveyed the more precise and reliable the statistical analysis becomes; therefore, more blocks may be flown to reduce variance.

Surveys will be completed in March annually, preferably after a recent snow fall. The exact timing will be dependent on weather and aircraft scheduling constraints and may be varied to take advantage of forecasted snow events. For effects monitoring, two years of surveys will need to be completed pre-construction (preferably one year each of shallow and deep late winter snow depth), annually throughout construction, annually throughout operations for the first three years, and periodically (e.g., every two to three years) thereafter until Project closure.

The survey will be conducted by one crew using a helicopter (Eurocopter A-Star variants). The survey personnel will consist of a navigator, primary observer (behind the pilot), and secondary observer (behind the navigator). We propose that survey personnel consist of two EDI biologists experienced with SRB survey designs (navigator and primary observer) and an additional observer (secondary observer) appointed by BMC, Kaska Dena, or the Fish and Wildlife Branch of Environment Yukon.

Selected survey blocks will be surveyed by flying transects spaced 350 to 400 m apart for a search intensity of approximately 2 minutes per km². Survey flight paths will follow constant elevation contours instead of transects when flying over terrain with high relief while aiming for a similar search intensity. Flight elevation will be approximately 60-90 m above ground level at speeds of approx. 90-115 km/hr while on survey. Elevation and speed will be adjusted within those ranges based on terrain and wind conditions to maximize moose detections and for personnel safety considerations. All moose observed in the blocks will be counted and classified by age and sex.

Flight tracks will be recorded using a Garmin GPS as well as an iPad using the Avenza Maps software allowing the navigator to track flight lines in real time to ensure adequate spatial coverage and to minimize the likelihood of duplicating observations. Moose observations will be recorded as waypoints using a Garmin GPS. Following the completion of the survey, all data forms and notes will be scanned and saved into an electronic format. All data will be entered and compiled in an electronic database for statistical analysis.

Access Road Permeability

As part of this effects monitoring program, Environment Yukon requested that camera traps be deployed on wildlife trails that cross the Access Road to assess whether the road is becoming more of a barrier to wildlife movement over time (i.e., road permeability). BMC currently has a baseline camera trap program consisting of 90 cameras and several cameras are already deployed along the Access Road at wildlife trail crossings. The study will be adapted to include a paired camera design where two cameras are deployed on wildlife trails that cross the Access Road, one near the road and one approximately 200 m away from the road. This will require the addition of approximately 15 cameras to the existing study and making some adjustments to existing camera locations.

Data Analysis

Data analysis and statistical modeling to detect Project effects will be conducted by a qualified biostatistician in partnership with the Department of Environment moose program. These analyses will be required starting with the construction phase but not earlier. This section will be completed once

Environment Yukon releases the proponent's guide for this survey design and makes it available to industrial partners.

Literature Cited

Analythium Solutions. 2023. Late winter moose distribution survey methods. Analythium Solutions. 41 pp.

BMC Minerals Ltd. 2022. Kudz Ze Kayah Project - Wildlife Protection Plan, Rev 01. BMC Minerals Ltd., Vancouver, BC. 56 pp.

BMC Minerals Ltd. 2023. Ungulate Baseline Report (2022-2023) Kudz Ze Kayah Project. BMC Minerals Ltd., Vancouver, BC. 143 pp.

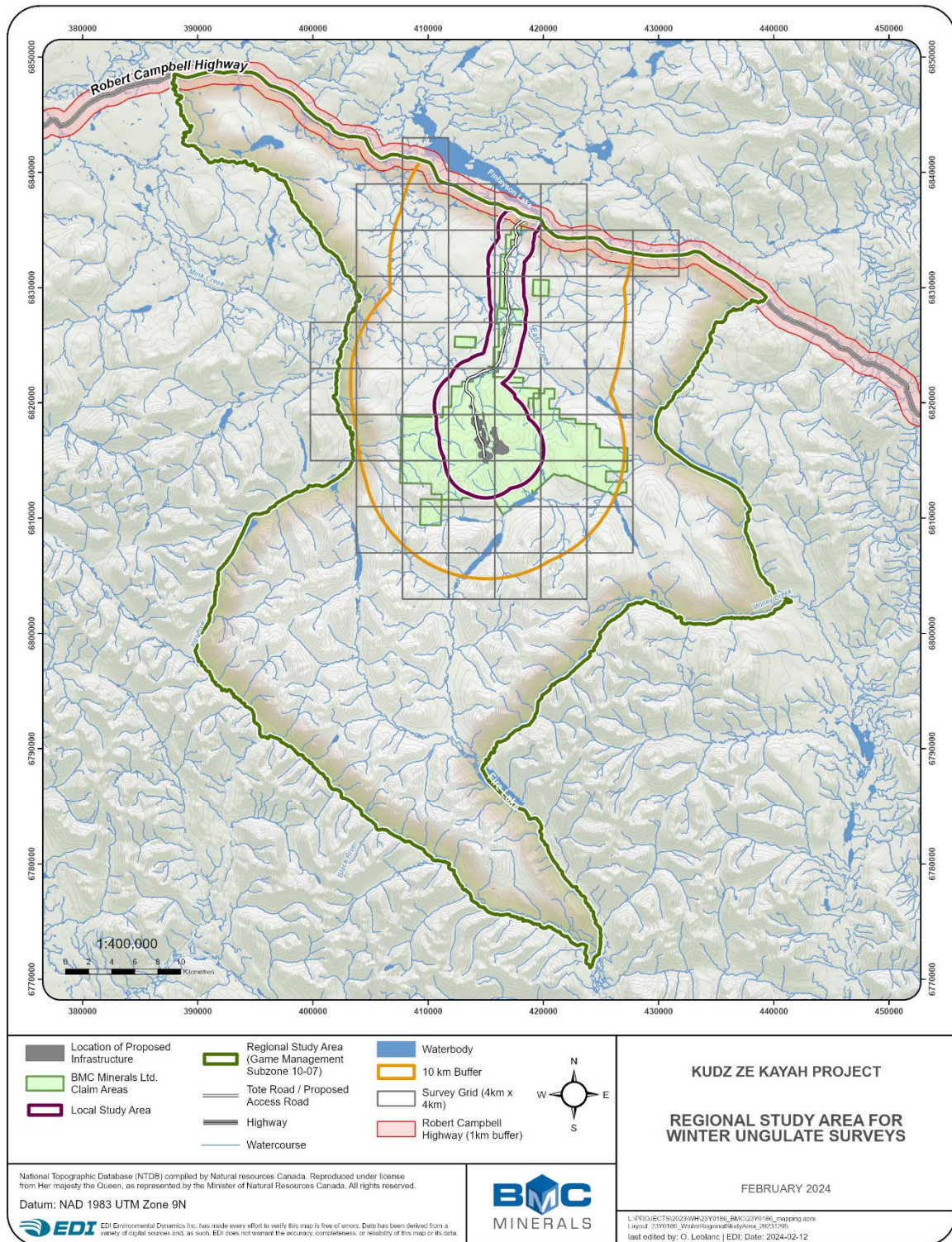


Figure 1. Regional Study Area for the moose effects monitoring survey for the Kudz Ze Kayah Project including the 10 km buffer from the Project footprint and 4 x 4 km survey grid.

APPENDIX F:

LICENCE CONCORDANCE TABLES

Table of Concordance between Wildlife Related Conditions and Clauses of Lease Agreement 105G07-001 (Including Schedule 2) and the KZK Wildlife Protection Plan

Clause #	105G07-001 Condition/Clause ¹	WPP Section
Environmental		
23	The <i>Lessee</i> shall ensure that all activities are conducted in such a manner that mitigates any significant adverse environmental effects.	The WPP was produced to mitigate adverse environmental effects on wildlife and applies in its entirety to this clause.
31	i. The <i>Lessee</i> 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 such areas used by caribou and other migratory wildlife (i.e. moose). ii. Encounters with wildlife are to be avoided. If caribou or moose are encountered on the access road, the equipment and or activity is to be halted immediately until the wildlife has left the immediate area. iii. The <i>Lessee</i> shall develop a reporting mechanism with YG Renewable Resources for the reporting of wildlife fatalities that occur along the access road.	i. Most of the Access Road is below treeline and does not interact with caribou calving, post-calving, and rutting range. However, the southern portion of the Access Road (~15%) interacts with these seasonal ranges, albeit at lower elevations than preferred habitats in these seasons and could not be avoided during road construction given the location of the KZK Project. BMC developed a suite of caribou and Access Road management control and mitigation measures to minimize disturbance to caribou and other migratory wildlife. See Sections 4.2.2, 5.2.1 and 6.1.1.

Clause #	105G07-001 Condition/Clause ¹	WPP Section
		ii. Section 5.2.1. The wording for this clause was modified in the WPP for legibility and for concordance with Condition 66 of LQ00424b. iii. Section 7.2.1 and Chapter 8
32	The <i>Lessee</i> shall, during the term of this lease, carry out the wildlife protection, monitoring, facilities, management, and consultation provisions as set out in Schedule 2, attached hereto and in accordance with the provision of the letter agreement, dated July 29, 1999 entered into between the <i>Lessee</i> and Yukon Government, Department of Renewable Resources.	Relevant clauses of Schedule 2 are addressed throughout the WPP. See the relevant clauses from Schedule 2 below.
Access		
49	The <i>Lessee</i> may maintain the gate and gatehouse installed on the mine access road within the boundaries of the <i>Land</i> .	Section 4.2.1
53	The <i>Lessee</i> shall report in writing to <i>Yukon</i> each instance of unauthorized use of the <i>Land</i> within one month of the instance becoming known to the <i>Lessee</i> .	Section 4.2.1
Waste Disposal		
80	The <i>Lessee</i> shall dispose of all combustible garbage and debris by burning in an incinerator approved by the Lands Agent and remove all noncombustible garbage and debris to an authorized dumping site.	Section 5.1.2. The wording for this clause was modified in the WPP for legibility and for concordance with Conditions 33 and 34 of LQ00424b.
Schedule 2 – 1.0 Wildlife Protection Policy		
1.1	Prior to commencement of construction of the project, the lessee shall establish Wildlife Protection Policies to encourage wildlife awareness and avoid disturbance effects. The Wildlife Protection Policies shall include the following: i. environmental training for all mine employees and contractors, pursuant to which the lessee will implement an education and awareness program with respect to wildlife and habitat protection needs of wildlife. One objective of this program will be to educate mine employees and contractors about potential wildlife issues and	Commitments that address this clause are found in: i. Section 3.2

Clause #	105G07-001 Condition/Clause ¹	WPP Section
	the commitments made by the lessee regarding wildlife mitigation. This program shall be presented in conjunction with site orientation and training and shall be made available in written form as part of the overall environmental program at the mine. Upon request by the lessee, the Yukon Territorial Government Renewable Resources (YTG RR) will provide assistance in reviewing program materials and making related presentations to mine personnel; ii. a "No hunting/No Fishing Policy" applicable to all mine employees and contractors. The objective of this policy will be to prohibit hunting and fishing in the general vicinity of the project mine site or haul road to the Robert Campbell Highway. This policy shall be in effect throughout the life of the project from construction through to closure and reclamation and shall apply to all mine employees and contractors. The lessee shall notify the lessor of any reported infringement of this policy' iii. a policy prohibiting recreational use by employees and contractors of all-terrain vehicles and snowmobiles. The lessee shall prohibit access and use of ATVs and snowmobiles for recreational purposes on the mine haul road and the mine site; and, iv. a wildlife and incident reporting log in accordance with Section 2.0, Wildlife Monitoring.	ii. Sections 1.3, 3.2.1, and 5.5 and Appendix A iii. Appendix A iv. Section 7.2 Note that the wording for this clause was modified in the WPP for legibility, for concordance with other schedule 2 clauses and LQ00424b conditions, and to provide additional details.
Schedule 2 – 2.0 Wildlife Monitoring		
2.1	Wildlife activities in the project area are to be monitored to identify changes in wildlife migration, distribution, and abundance, to evaluate causal relationships between observed	This clause contains several requirements for wildlife

Clause #	105G07-001 Condition/Clause ¹	WPP Section
	changes and project-related activities and to obtain information for the planning of mitigation. Monitoring of caribou and moose shall be used as indicators for the Valued Ecosystem Components. Monitoring shall be used to detect changes beyond baseline conditions or specific values for Valued Ecosystem Components.	monitoring. Wording for this clause was modified in the WPP for legibility and to provide additional details. Commitments that address this clause are found in Section 7.1 and Section 8.
2.2	The parameters for Valued Ecosystem Components monitoring shall be as follows: (i) frequency of surveys should be established in two year periods, commencing upon mine construction, subject to review at annual meetings of the Lessor, the Lessee, YTG RR, affected First Nations, and other resource users in the area, including, but not limited to representatives of outfitters and trappers groups (the "Interested Parties"). The period for which surveys are required should be for the life of the mine, unless otherwise determined by the parties; (ii) survey area definition should be as completed in accordance with the original baseline survey for the project as shown in the map attached as Schedule 3 [see appendix 5 of IEE]; (iii) survey methodology shall include participation in annual YTG post- calving and rut surveys for caribou in conjunction with YTG RR survey schedules. Moose observations for the project area should be included in these surveys. Methodology, including participation, should be determined annually through discussions with the YTG RR regional biologist (the "Regional Biologist"); (iv) survey reporting shall be made by December 31 of each year for review in annual meetings of the Interested Parties.	This clause contains several requirements for wildlife monitoring and reporting. Wording of this clause was modified in the WPP for legibility, to provide additional details on BMC's monitoring commitments which exceed those stipulated in this clause, and because some of the material found in this clause is outdated (e.g., the last YG led post calving and rut surveys were conducted in 1998 and 2014, respectively). Commitments that address this clause are found in Sections 7.1 and 7.2. Note that (ii) survey areas will be reviewed and approved by ENV, (iii) these surveys are no longer conducted by YG, and

Clause #	105G07-001 Condition/Clause ¹	WPP Section
	(v) survey follow-up should include review and discussion with Interested Parties of survey data in conjunction with YTG as well as additional mitigation based on the findings of effects monitoring. Reformatting of the wildlife monitoring design may also be required to reflect changing conditions.	(iv) date of reporting will be stipulated in the QML and Amended Road Lease.
2.3	The lessee shall maintain a written log of wildlife observations and incidents for the mine property and access road. The Wildlife Log shall include time and date, species, location of observation, and other relevant information such as mortality of wildlife and birds. The Wildlife Log shall be maintained for the life of the mine until there are no longer employees on site. The area definition should include the mine property and access road, as well as relevant portions of the Robert Campbell Highway. The Wildlife Log shall be in written form, including maps. The Wildlife Log shall be reviewed annually each January with the Regional Biologist for the area. Wildlife collisions and mortalities should be reported immediately to the local YTG RR conservation office.	Wording of this clause was modified in the WPP for legibility, concordance with Condition 15 of LQ00424b, and to provide additional details. Commitments that address this clause are found in Section 7.2. Note that the time of year for the wildlife log review will be stipulated in the QML and Amended Road Lease and wildlife incidents will be reported within 24 hrs as per clause 4.4.
2.4	Wildlife observations, monitoring programs, and incidents may be required to be followed up with additional mitigation as determined by the lessor, in consultation with the lessee, YTG RR and affected First Nations.	Section 1.6
Schedule 2 – 3.0 Metal Accumulation Monitoring in Forage Plants		
3.1	Within two years of mine start up, the lessee shall establish a metal monitoring program in consultation with the parties and affected First Nations.	This is included in the Project's Environmental Monitoring, Surveillance and Reporting Plan
Schedule 2 – 4.0 Facilities Management		
4.1	Commencing upon construction of the project, the lessee shall manage company- directed activities and transportation along the Mine Haul Road to avoid wildlife mortality and to	This clause contains several distinct requirements for

Clause #	105G07-001 Condition/Clause ¹	WPP Section
	eliminate movement barriers from wildlife access routes. Areas of concern shall include the Mine Haul Road and portions of Robert Campbell Highway and other highway routes used, if applicable. The lessee shall consult with the YTG, RR and Department of Transportation to implement appropriate wildlife protection measures, which may include, but are not limited to maintenance guidelines for winter, speed reduction zones, signs at crossings, radio equipped trucks, reporting of wildlife on roads.	control and mitigation measures related to traffic and access management. Wording for this clause was modified in the WPP for legibility and to provide additional details. Commitments that address this clause are found in Sections 4.2 and 5.2.
4.2	Aircraft use shall be carried out to minimize non-essential flight activities and to avoid wildlife calving and rutting areas during sensitive lifecycle periods. Avoidance periods are subject to change from-time to time in accordance with results from wildlife survey and Wildlife Log observations and consultation with the Regional Biologist.	Section 5.2.3
4.3	The lessee, in consultation with the Regional Biologist, shall establish appropriate measures to carry out blasting activities at the mine in a manner that avoids disturbance of wildlife during critical lifecycle activities, particularly caribou calving and sheep lambing periods.	Section 5.3
4.4	The lessee, in consultation with the Regional Biologist, shall establish appropriate measures to prevent bear attraction into the project area, including the mine, camp, and Mine Haul Road, and elimination of problem wildlife incidents for all species. Bear avoidance measures shall include fencing the dump and kitchen areas with electric fences, storage of waste in bear-proof containers, and daily incineration of waste in a Canadian Standards Association approved fuel-fired incinerator. All bear incidents are to be reported to the local Conservation Officer within 24 hours of the incident or as directed by a Conservation Officer in writing.	This clause contains several distinct requirements for wildlife mitigation measures related to wildlife access controls, waste management, human-wildlife conflict management, and reporting. Wording for this clause was modified in the WPP for legibility, concordance with Conditions 14, 32, 33, 34, 72, and 73 of LQ00424b, and to provide additional details. Commitments that address this

Clause #	105G07-001 Condition/Clause ¹	WPP Section
		clause are found in Sections 4.4, 5.1.2, 5.4, and 7.2.
4.5	The lessee shall implement progressive reclamation plans with the objective of minimizing impacts and duration of habitat loss associated with disturbed areas that are no longer required for mine-related activities. The lessee shall report annually on the extent of surface disturbances and reclaimed areas.	Section 4.5
Schedule 2 – 5.0 Consultation		
5.1	The lessee shall provide opportunities to meet at least once each year with Interested Parties to report on and review the wildlife protection and monitoring provisions contemplated in this schedule. A primary objective of the annual meetings shall be to provide advance notice of anticipated project activities and plans for the upcoming year and to avoid unnecessary conflicts with other resource users.	Section 1.5.2

¹ For purpose of legibility in the WPP, the terms “the lessee shall” will be replaced with “BMC will”; “shall” with “will”; “lessor” with “YG”; “lessee” with “BMC”; “RR” with “Regional Biologist”.

Table of Concordance between Wildlife Related Terms and Conditions of MLUA LQ00424b and the KZK Wildlife Protection Plan

Clause #	Operational Guidelines, Terms, and Conditions ¹	WPP Section
Operational Guidelines		
First bullet	The operator should contact the Yukon Conservation Data Centre (867-667-5331) for up-to-date information on species of special concern that may be found in the project area. If these species or sign of their presence are identified/encountered in the project area, the operator should contact the Regional Biologist in Watson Lake (867-536-3214) for advice on possible mitigations.	Section 6.9
Part Two – Reporting Requirements		
6	All spills must be reported immediately to the 24-Hour Yukon Spill Reporting Line (867) 667-7244 and to the Natural Resource Officer, Mining Division in Watson Lake & Whitehorse (867) 456-3882.	Section 7.2
14	All incidents with wildlife shall be reported to the District Conservation Officer in Watson Lake (Liard Region) at (867) 536-3210, as well as any other communication regarding wildlife.	Section 7.2
15	The operator shall maintain a wildlife log which shall be provided to the Chief, Mining Lands annually. The log shall include the following: date and time of sighting, a detailed location description (coordinates are preferable), species and number of animals, age and sex if possible, activity of the animals, and any other comments.	Wording of this condition was modified in the WPP for legibility and to provide additional details. Commitments that address this condition are found in Section 7.2
Part Three – Terms and Conditions		
16	If the vegetative mat must be removed to carry out exploration activities, it must be removed so as to protect the seed and root stock contained within the mat and be stored separately from other overburden or bedrock removed for use in re-establishing the vegetative mat when the exploration program ceases.	Section 4.3
17	Avoid disturbance to riparian vegetation wherever possible and, if required out of necessity, riparian vegetation shall only be cut to ground level so as not to damage rootstock and promote rapid regeneration.	Wording of this condition was modified in the WPP for legibility and to provide additional details.

Clause #	Operational Guidelines, Terms, and Conditions ¹	WPP Section
		Commitments that address this condition are found in Section 4.3
20	If adequate seed or root stock is not naturally available, re-seeding or transplanting of vegetation is required. Only non-invasive species may be used for re-seeding or transplanting. If seeding is required, the operator shall contact Government of Yukon, Compliance, Monitoring and Inspections for further information on appropriate seed mixes or collection of local seed.	Section 4.5
21	The operator shall ensure that annual reclamation efforts are successful in re-establishing the vegetative mat and community. A variety of sloping, contouring, scarifying and spreading of fines, silt and/or vegetative mat would prepare the ground to achieve these ends and encourage natural re-vegetation	Section 4.5
23	All areas disturbed during an exploration program must be re-sloped, contoured or otherwise stabilized to prevent long-term soil erosion, slumping and subsidence.	Section 4.3
30	All solid waste, including debris, equipment, barrels, drums, and scrap metal, must be safely stored on the site of the exploration program while the program is carried out and must be disposed of in accordance with the Solid Waste Regulation when the program ceases.	Section 5.1.2
31	To prevent the spread of invasive plants, all heavy equipment and vehicles shall be clean and free of seed and plant material prior to entering the project area.	Section 4.1
32	Camps must be kept clean and tidy.	Wording for these conditions was modified in the WPP for legibility, concordance with Schedule 2, Clause 4.4 of Land Lease 105G07-001, and to provide additional details. Commitments that address these conditions are found in Section 5.1.2
33	The operator shall keep all garbage, including kitchen waste, in a container that prevents access by bears and other wildlife, until properly disposed of in accordance with the Solid Waste Regulations.	
34	When burning kitchen waste on site it must be burned regularly to reduce odours that might attract wildlife and be burned to ash by forced air or fuel fired incineration.	
43	If a spill occurs, the spill contingency plan must be immediately implemented and notice given to the 24-hour Yukon Spill Report Line. As soon as practicable, an inspector must be contacted.	Section 5.1.3

Clause #	Operational Guidelines, Terms, and Conditions ¹	WPP Section
	Whatever remedial action is required to clean-up the spill and reclaim the affected land and water must be taken.	
44	Vehicles must be maintained and operated to prevent spills of fuel, lubricants, coolants and oil.	Section 5.1.3
45	Cut brush must not be piled so that it blocks movement of wildlife or people.	Section 4.3
49	All reasonable efforts must be made when drilling to minimize the impact on wildlife and the public.	Section 5.3
59	Trail routes must be reconnoitered and must be used in a way that minimizes ground disturbance, including damage to permafrost and sensitive wildlife habitat.	Section 4.3
64	Where the construction of trails cannot be avoided, the operator shall construct trails as narrow as possible and avoid straight lines where possible. This will limit use of trails as 'wolf highways' which can increase predation of ungulates by wolves.	Section 4.3
63	In addition to any remedial action required in relation to re-establishment of the vegetative mat, temporary trails must be blocked to prevent further vehicular access.	Section 4.5
66	If ungulates, bears or wolverines, are encountered while carrying out project activities, the activities shall stop, as long as it is safe to do so, until the animal(s) has left the area. Wildlife shall be given the right of way.	Section 5.3
67	The operator shall contact the Watson Lake Regional Biologist for information on appropriate set back distances if nests, dens or mineral licks are encountered. These site-specific features shall not be disturbed.	Section 3.3.3
68	The operator shall contact YG, Environment for detailed information on the exact location of mineral licks within the polygon on the Wildlife Key Area maps (note: mineral licks are not situated in the centre of the 5 km diameter circular polygons) and for information on techniques/methodologies related to monitoring mineral licks.	Section 3.3.3
69	Any new mineral licks found by the operator shall be reported to the Watson Lake Regional Biologist.	Section 3.3.3
70	The operator shall plan to avoid carrying out their airborne geophysics program during the critical periods for caribou, which in this area is May to July for calving and post-calving and mid-September to mid-October for rutting. The operator shall conduct their airborne geophysics program during late August.	Section 6.1.1

Clause #	Operational Guidelines, Terms, and Conditions ¹	WPP Section
71	The operator shall plan to avoid carrying out their helicopter exploration activities during the critical periods for caribou (critical periods for this area are May to July for calving and post-calving and mid-September to mid-October for rutting.) If caribou are present within 1 km of the active work area during these times, helicopter exploration activities shall cease until the caribou have left the area.	Section 6.1.1
72	The operator shall supply the camp with bear deterrent devices such as bear bangers, cracker shells, bear spray, etc. The bear awareness training provided to personnel and contractors shall include use of these deterrent devices.	Section 5.4
73	If conditions are warranted, the camp shall be enclosed with electric fencing with attention given to camp design (as outlined in the Guideline for Industrial Activity in Bear Country for the Mineral Exploration, Placer Mining and Oil and Gas Industries) in order to avoid attracting bears. Warranted conditions are developed in consultation with the Conservation Officer and include site-specific bear activity.	BMC made commitments that go beyond the requirements of this condition. Wording in the WPP was modified for legibility. Commitments that address this condition are found in Section 4.4
74	All food and cooking supplies should be either stored securely in metal bear-proof containers or removed from site during times when the camp is closed.	Section 5.1.1
76	Reclamation shall be progressive in nature where possible and completed before expiry of the approval.	Section 4.5
77	The operator shall remove any flagging tape used to carry out project activities once the activities are completed unless bio-degradable tape is utilized.	Section 5.1.2
81	Debris, equipment, fuel barrels, scrap metal and other waste at the work site shall be completely disposed of, so as not to attract wildlife, by removal to an authorized disposal site as often as is practicable throughout the mining season and completely at the cessation of the operation.	Section 5.1.2

¹ For purpose of legibility in the WPP, the terms “the operator shall” and “the operator should” will be replaced with “BMC will”; “the operator” will be replaced with “BMC”; “shall” and “should” will be replaced with “will”; “project” with “Project”.

APPENDIX G: YUKON CONSERVATION DATA CENTRE REPORTABLE SPECIES FACT SHEETS



Photo: ©iStock.com/Andrew Howe

American Kestrel

Falco sparverius

HABITAT

Prefers open areas for hunting, including open spruce or mixed spruce-aspen woodlands, open burns, meadows, wetlands, and alpine tundra. Also requires large trees with woodpecker holes for nesting cavities.

DISTRIBUTION

Yukon: Summer visitor throughout Yukon but is not known to breed on North Slope.

North America: Found in open country south of the Arctic treeline from central Alaska and northern Canada, south to the southern tip of South America. Winters from southern Canada southward.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5B (Secure)

Yukon: S2B (Imperilled)

DISTINGUISHING FEATURES

A small falcon with striking colours; slate blue head with conspicuous rusty red tail and back; and vertical dark 'sideburns' on its cheeks. Often seen hovering with wings beating rapidly.

Report Sightings: During breeding season (May 15 - July 31)

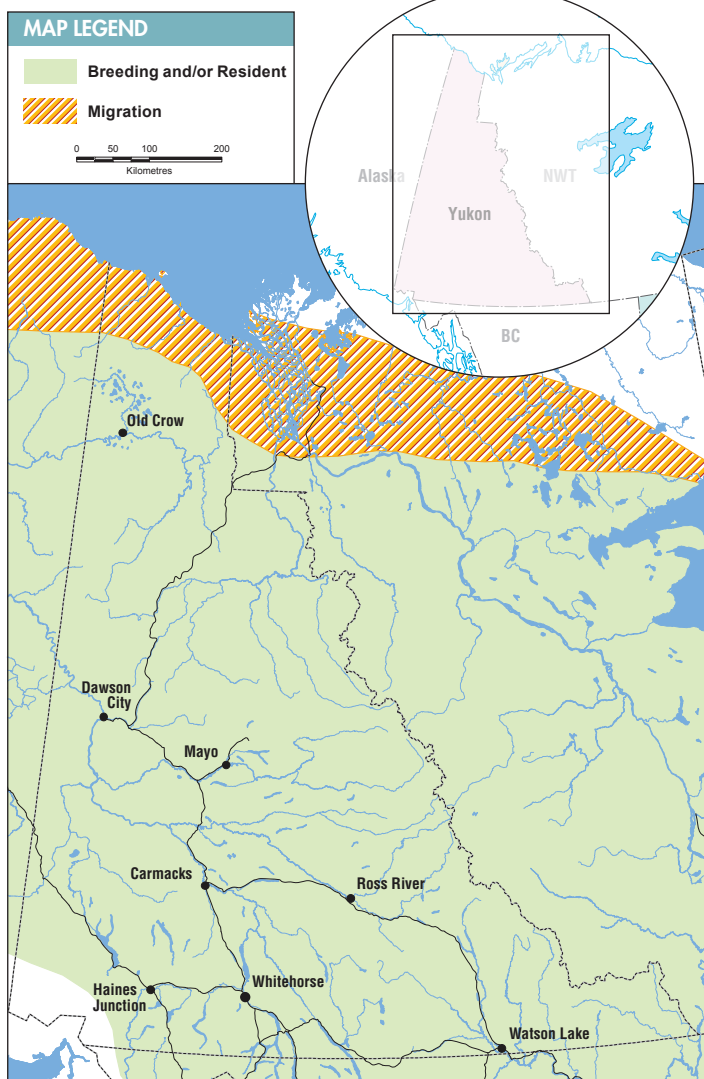


Photo: ©iStock.com/John Pincher



Photo: Cameron Eckert

Bank Swallow

Riparia riparia

HABITAT

Nest in large colonies in steep riverside cliffs, and cutbanks of silt, sand and clay

DISTRIBUTION

Yukon: Widespread throughout Yukon along rivers with suitable silt banks. Rare north of treeline.

North America: Breeds across North America from treeline south to California in the west and South Carolina in the east. Winters throughout much of central and South America.

Global: Circumpolar breeding distribution.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5B (Secure)

Yukon: S5B (Secure)

DISTINGUISHING FEATURES

Distinct brown breast band, often extending in a line down the center of breast. Upperparts are brown, throat is white.

Report Sightings: Colony sites



Photo: Bruce Bennett



Photo: Gordon Court

Barn Swallow

Hirundo rustica

HABITAT

Generally nests on buildings and other artificial structures; occasionally on river and lakeside rock cliffs.

DISTRIBUTION

Yukon: Widespread across southern Yukon, although breeding has been noted occasionally in the central and northern Yukon.

North America: Breeds from southern Alaska, Yukon, NWT and all Canadian Provinces south to Baja California, northern Mexico, and southeastern USA.

Global: Circumpolar distribution. North American populations winter in the lowlands of South America.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5B (Secure)

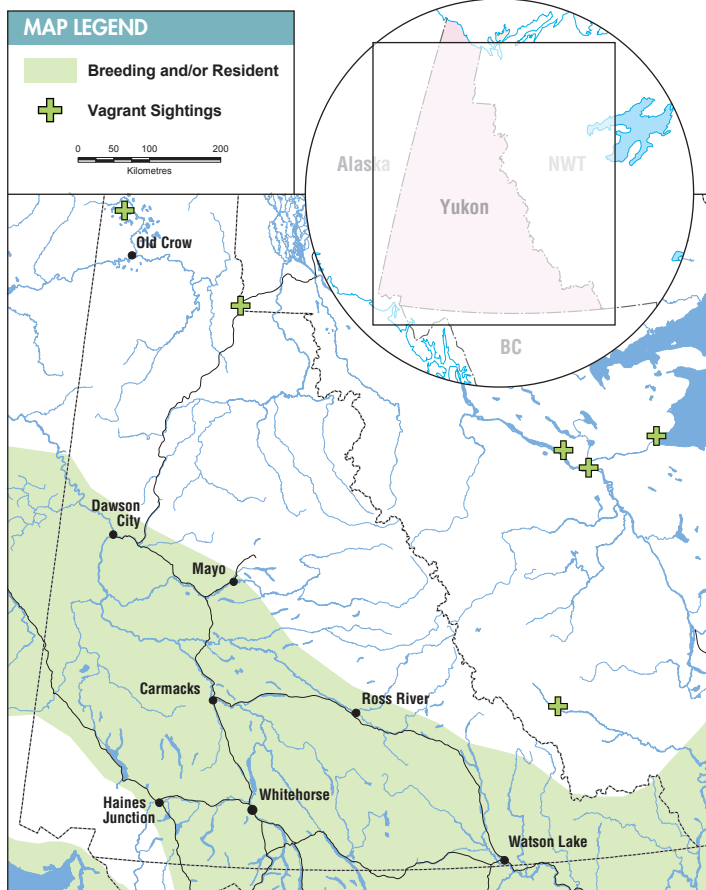
Yukon: S3B (Vulnerable)

COSEWIC Status: Threatened (2011)

DISTINGUISHING FEATURES

Distinguished by its long, forked tail. Has steely, iridescent blue back, reddish-brown throat and buffy underparts. Flight is leisurely with slow wingbeats.

Report Sightings: During season



Common Nighthawk

Chordeilis minor

HABITAT

Nest in a variety of open habitats such as old burns, open forests, and around wetlands.

DISTRIBUTION

Yukon: Range covers most of the lowlands of southern Yukon, north to Dawson.

North America: Breeds across North America from central Yukon to Labrador south through the USA, Mexico and Panama.

Global: Winters in Peru, Ecuador, Brazil and southward.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N4B (Apparently Secure)

Yukon: S2B (Imperilled)

COSEWIC Status: Threatened (2007)



Photo: John Meikle

DISTINGUISHING FEATURES

Recognized by its loud, *peent* flight call and the male's unusual diving sound display; by its long, narrow wings with a bold white bar across the primaries; and by its pointed, slightly forked tail.

Report Sightings: Nests, feeding flocks

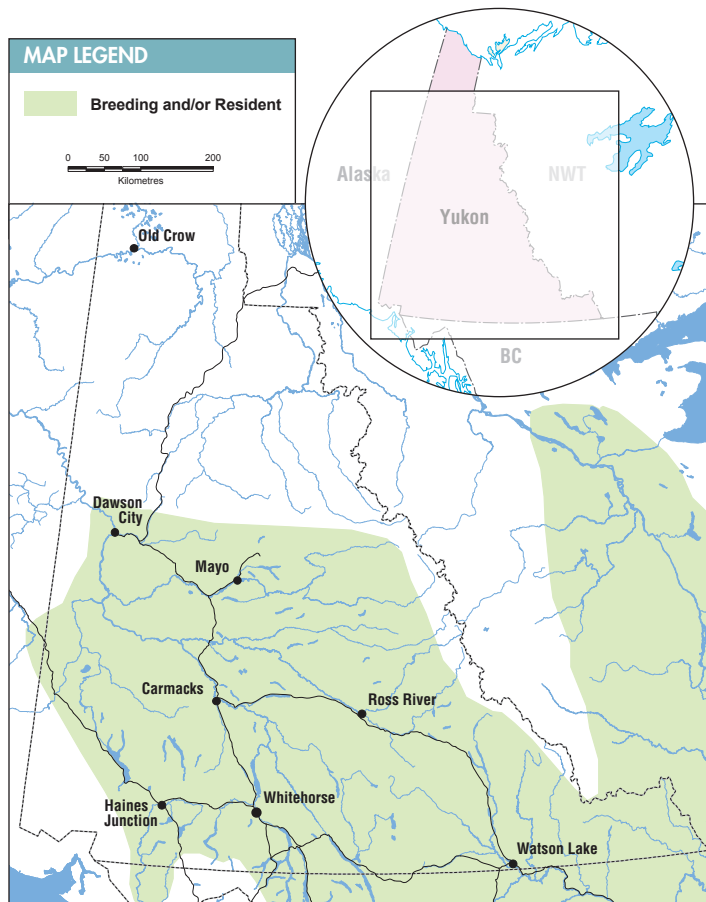


Photo: Bruce Bennett

Harlequin Duck

Histrionicus histrionicus

HABITAT

During breeding, the Harlequin Duck prefers swiftly flowing streams and rivers, both above and below treeline. Nests on the ground, near water protected by vegetation.

DISTRIBUTION

Yukon: Widespread breeder on swift-flowing rivers and creeks.

North America: In the west, breeds throughout mountains from Alaska to Wyoming. In the east, breeds in southern Greenland, northern Quebec, Labrador, Newfoundland and the Gaspé. Western populations winter on Pacific coast from Bering Sea to northern California, and eastern population on Atlantic coast from Greenland to Virginia.

Global: Also breeds in eastern Siberia; some winter on coasts of Japan, Korea, and northern China.



Photo: ©iStock.com/Flatcoater

CONSERVATION RANK

Global: G4 (Apparently Secure)

Canada: N4B, N4N (Apparently Secure, Apparently Secure)

Yukon: S3B (Vulnerable)

DISTINGUISHING FEATURES

A small duck with a steep forehead, rounded head and stubby bill. Breeding male is an unmistakable slate-blue, with white spots and stripes, and chestnut-coloured flanks. Female is a plain brown with three white spots on each side of head.

Report Sightings: On streams only

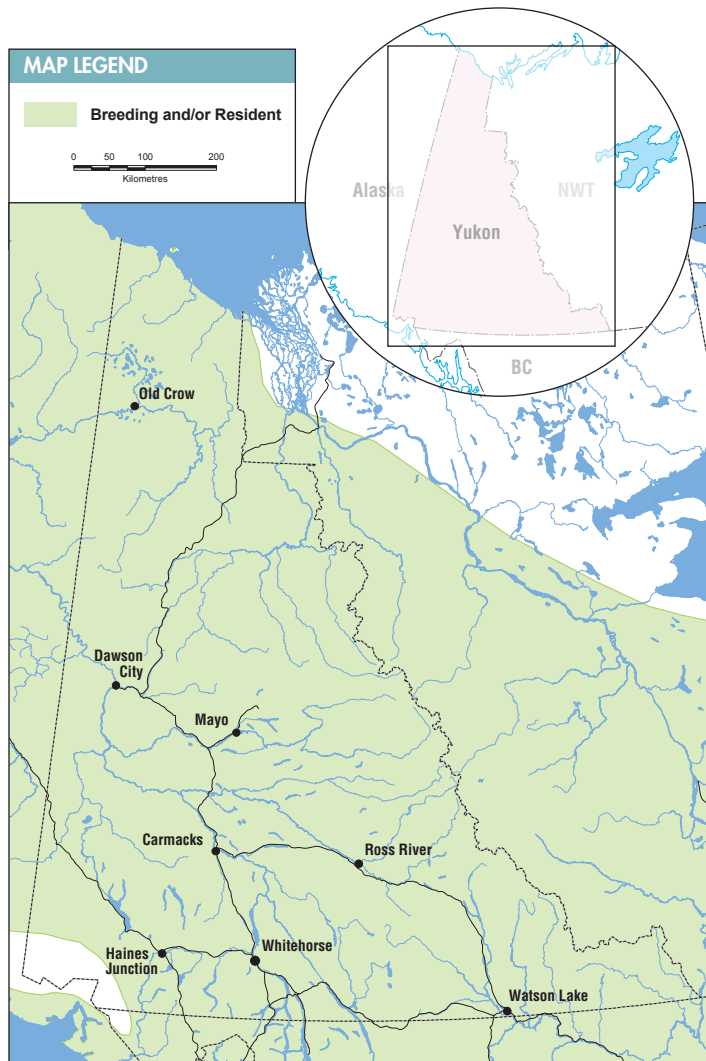




Photo: ©iStock.com/Paul Reeves

Northern Shrike

Lanius excubitor

HABITAT

In breeding season, inhabits shrubby subalpine, subarctic and taiga habitats associated with creeks and rivers. Usually nests in a small deciduous tree.

DISTRIBUTION

Yukon: Uncommon in subalpine and shrub tundra throughout Yukon; most common in the far north.

North America: Breeds in Alaska and across Canada's northern taiga and boreal forest to the Labrador coast. Winters in south-eastern Alaska, southwestern Yukon, northwestern BC, and across southern Canada, the northeastern and western USA.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5B, N5N (Secure)

Yukon: S3B (Vulnerable)

DISTINGUISHING FEATURES

A robin-sized, grey bird with black mask, black wings and tail. Its predatory nature is revealed in its stout, hooked beak.

Report Sightings: Breeding habitat (May 1 - July 3)



Photo: ©iStock.com/Paul Reeves



Olive-sided Flycatcher

Contopus cooperi

HABITAT

Common in old, open forests from valley bottoms to treeline, often at the edge of wetlands with dead trees for perches.

DISTRIBUTION

Yukon: Across the southern Yukon; sparsely north to the Porcupine River.

North America: Breeds across North America from Alaska and the Atlantic Provinces south to Maine and the mountains of New Mexico and California.

Global: Winters in Central America and South America, from Colombia and Venezuela south to Peru and Bolivia.

CONSERVATION RANK

Global: G4 (Apparently Secure)

Canada: N5B (Secure)

Yukon: S2S3B (Imperilled)

COSEWIC Status: Threatened (2007)



Photo: Jason Wade



DISTINGUISHING FEATURES

This flycatcher is almost as large as a robin, with a large bill and dark chest patches separated by narrow white stripe. Its distinctive call has been described as quick, three beers!

Report Sightings: During breeding season (June - July)



Photo: Jason Wade



Photo: Gordon Court

Peregrine Falcon

Falco peregrinus

HABITAT

Nests on cliffs adjacent to or near wetlands, lakes, or rivers, most frequently on rocky cliffs along major rivers. The Peregrine requires a healthy population of ducks and shorebirds as a food source during the breeding season.

DISTRIBUTION

Yukon: A summer resident of most of Yukon's larger river valleys, although rare in the south and apparently absent from the southeast.

North America: Breeds in Alaska, northern and western Canada; rare elsewhere in southern Canada; scattered breeding areas south to central Mexico. Winters from the south coast of BC, the northern USA and southern Ontario south to southern South America.

Global: Found on all continents, but does not breed in tropical and subtropical America or New Zealand.

CONSERVATION RANK

Global: G4 (Apparently Secure)

Canada: N3B, N4B (Vulnerable to Apparently Secure)

Yukon: S3B (Vulnerable)

COSEWIC Status: Special Concern (2007)

DISTINGUISHING FEATURES

A large, crow-sized falcon with dark head and black sideburns and slaty back. Long, pointed wings; a long tail; and quick wingbeats identify it as a falcon.

Report Sightings: During breeding season (April 15 - August 31)



Photo: Gordon Court





Photo: Cameron Eckert

Red-necked Phalarope

Phalaropus lobatus

HABITAT

Breeds on wet sedge tundra with small scattered ponds, and marshy edges of small lakes. Nests on the ground in wet grassy areas near water.

DISTRIBUTION

Yukon: Breeds throughout Yukon; especially common on the coastal plain and Old Crow Flats.

North America: Breeds across northern North America, primarily in the taiga and low Arctic zones, from Alaska to the coast of Labrador.

Global: Northern North America and Eurasia.

CONSERVATION RANK

Global: G4G5 (Apparently Secure to Secure)

Canada: N4N5B (Apparently Secure)

Yukon: S3B (Vulnerable)

DISTINGUISHING FEATURES

The rufous-red neck with white throat is distinctive of breeding females, though less pronounced in males. Males are more variable in pattern, always with white eye line. All individuals distinguished from other phalaropes by white wing stripe in flight.

Report Sightings: During breeding season (late May - July)





Photo: Cameron Eckert

Rusty Blackbird

Euphagus carolinus

HABITAT

Breeds in shrubby wetlands, usually along the edges of ponds or lakes with dense sedges, shrubs and often scattered standing dead trees.

DISTRIBUTION

Yukon: Breeding confirmed throughout Yukon; increasingly scarce north of Dawson and essentially absent on North Slope. Rare in extreme southeast.

North America: Breeds from Alaska east to Newfoundland and south to the northeastern USA. Winters primarily in the south-eastern USA.

CONSERVATION RANK

Global: G4 (Apparently Secure)

Canada: N4B (Apparently Secure)

Yukon: S3B (Vulnerable)

COSEWIC Status: Special Concern (2006)

DISTINGUISHING FEATURES

Can only be confused with Brewer's Blackbirds (adult males conspicuously iridescent, adult females with dark eyes), which are not found in Yukon except occasionally in the Liard drainage. Adult female Rusty Blackbirds are dull brownish-grey with light eyes; males are solid black with light eyes. In August, both sexes moult into their winter plumage with rusty and beige feather edges, which wear off by spring. Identified by their conspicuous yellow eyes and rusty feather edges.

Report Sightings: During breeding season (June - July)



Sandhill Crane

Grus canadensis

HABITAT

Breeding habitat is usually within extensive sedge / grass marshes, often near the Arctic Coast.

DISTRIBUTION

Yukon: Abundant migrant, especially in Tintina Trench; breeding throughout northern Yukon, but primarily in the Porcupine basin and on the North Slope.

North America: Breeds in northeastern Siberia, through Alaska, the NWT and east to Lake Huron. Breeds south to northwestern Minnesota, Missouri, BC, and scattered locations in the western USA.

Global: Winters in Texas, New Mexico and northern Mexico.

CONSERVATION RANK

Global: G5 (Secure)

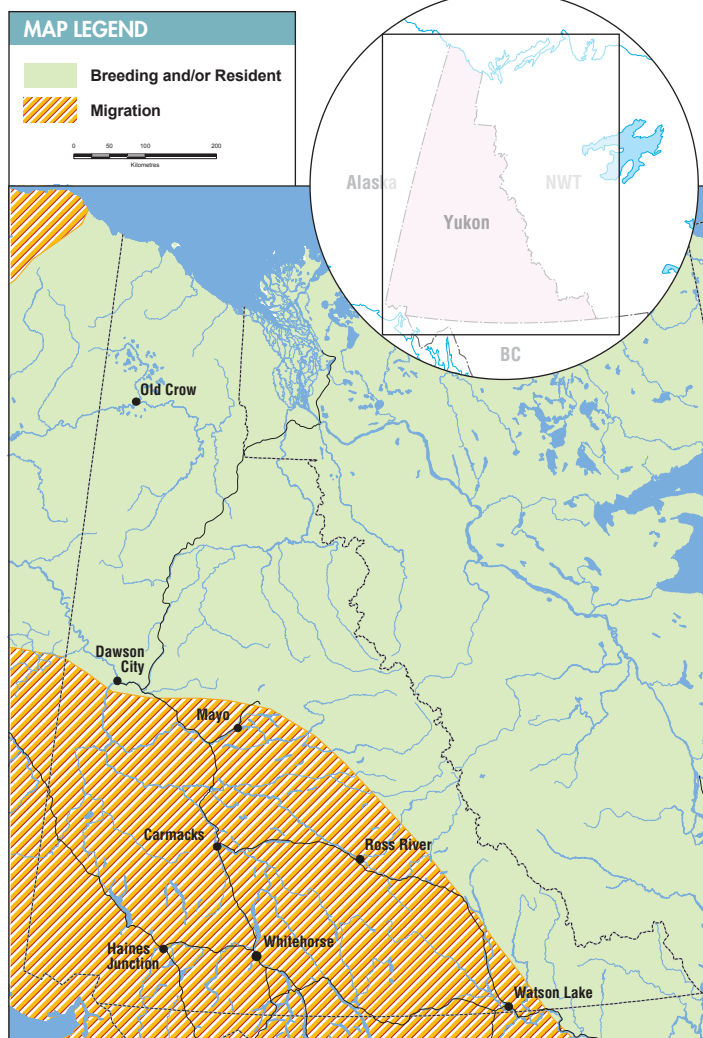
Canada: N5B (Secure)

Yukon: S3B, S4M (Vulnerable to Apparently Secure)

DISTINGUISHING FEATURES

A large, long-legged, long-necked wading bird. Adult is grey, with red skin on crown and lores; whitish chin, cheek and upper throat, white primaries. In flight, long legs are obvious. Loud, distinctive, trumpeting call.

Report Sightings: Breeding records from Dawson south



Short-eared Owl

Asio flammeus

HABITAT

Frequents open country, lowland tundra, muskegs, and large marshes. Nests on ground in grass-lined depression.

DISTRIBUTION

Yukon: Breeds primarily in low arctic tundra of the North Slope, Richardson Mountains, and Old Crow Flats. Breeding suspected but not confirmed in southern Yukon.

North America: Breeds from southern Arctic south to northern USA. Winters from extreme southern Canada to central Mexico.

Global: One of the most widespread birds; breeds in Eurasia, North and South America.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N3N, N4B (Vulnerable to Apparently Secure)

Yukon: S3B (Vulnerable)

COSEWIC Status: Special Concern (2008)

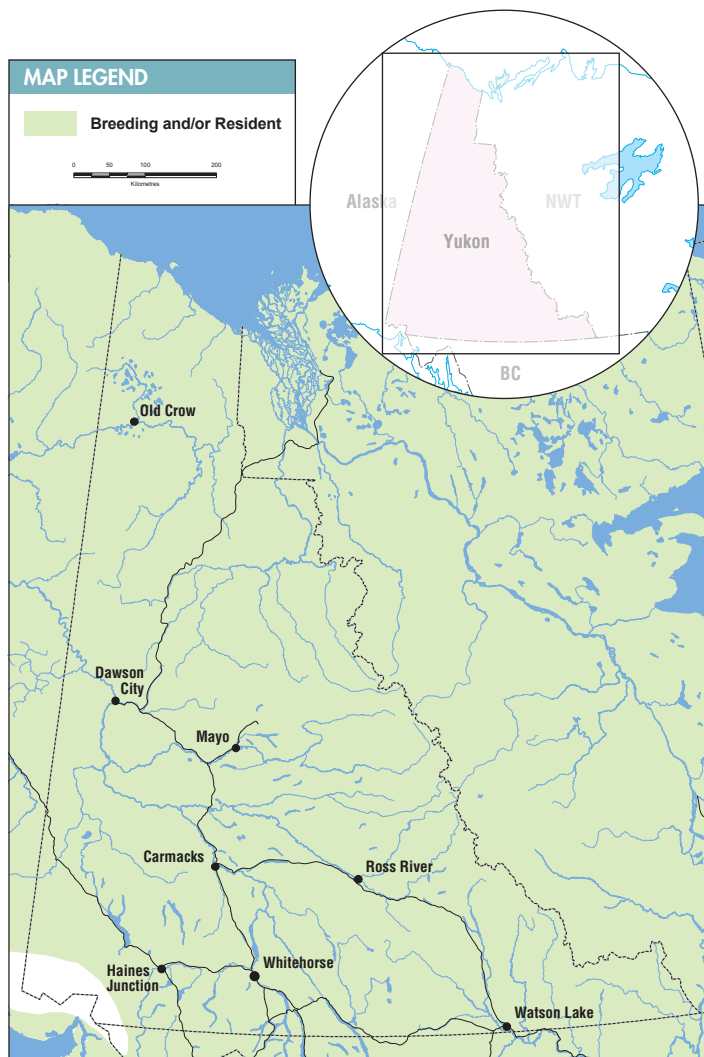


Photo: Jared Hobbs

DISTINGUISHING FEATURES

A tawny owl that hunts over open country, recognized by its long wings and distinctive stiff, slow butterfly-like wing beat with deep strokes.

Report Sightings: Including breeding (May 18 - July 31, or nest records)



Photo: Jared Hobbs

Smith's Longspur

Calcarius pictus

HABITAT

During breeding season Smith's Longspur inhabits open sedge tussock tundra with low shrubs. Nests on the ground.

DISTRIBUTION

Yukon: Scattered populations through much of northern Yukon and parts of mountainous central and southern Yukon.

North America: Scattered populations through low Arctic from northern Alaska east to James Bay, and in shrubby alpine from Alaska to northwestern BC. Winters in south-central USA.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5B (Secure)

Yukon: S3B (Vulnerable)

DISTINGUISHING FEATURES

Breeding adult male has a black and white head; rich, buff nape and underparts; and a white patch on shoulder. Breeding females are not as distinctive, with a dusky ear patch and pale buff eyebrow. Outer feathers on each side of tail are almost entirely white. Sings from the ground, not the air like the Lapland Longspur.

Report Sightings: During breeding season (June - July)





Photo: ©iStock.com/Michael Stubblefield

Wandering Tattler

Tringa incana

HABITAT

Found along creeks and rivers above treeline, usually high in the mountains but also in lower foothills in the north. Nests in gravel along streams.

DISTRIBUTION

Yukon: Widespread in alpine and tundra areas, except in the southeast.

North America: Breeds in the mountains of Alaska, Yukon, western NWT, northwestern BC, and northeastern Siberia.

Global: Winters along the Pacific coast from southern California to Ecuador, and in the South Pacific south to New Zealand.

CONSERVATION RANK

Global: G5 (Secure)

Canada: **N4B** (Apparently Secure)

Yukon: **S3B** (Vulnerable)

DISTINGUISHING FEATURES

Uniformly dark grey above, with whitish eyebrow; long, dark bill; and dull yellow legs. In breeding plumage underparts are heavily barred. Call is a ringing "kree-kree-kree."

Report Sightings: During breeding season (June - July)





Photo: ©iStock.com/Don Mammoser

Yellow-bellied Flycatcher

Empidonax flaviventris

HABITAT

Yellow-bellied Flycatchers are found in bogs, swamps, and damp coniferous woods; in Yukon, noted in boggy, open stunted Black Spruce and occasionally White Spruce forest with sparse deciduous shrubs.

DISTRIBUTION

Yukon: Scattered locations through central and southeastern Yukon.

North America: Breeds across the southern boreal to the Atlantic Provinces and the New England states.

Global: Winters from southern Mexico south to Panama.

CONSERVATION RANK

Global: G5 (Secured)

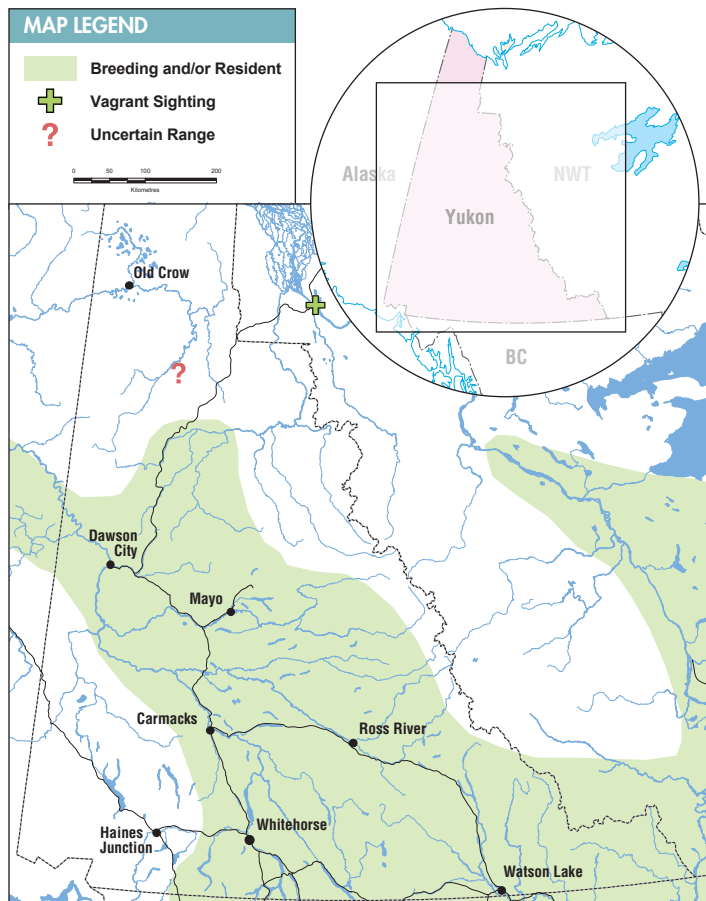
Canada: N5B (Secured)

Yukon: S3B (Vulnerable)

DISTINGUISHING FEATURES

A small flycatcher that is olive above and yellowish below, with a broad yellow eye ring; lower mandible entirely pale orange. Male gives a distinctive killink or che-bunk advertising song.

Report Sightings: During breeding season (June - July)



Butterflies & Moths: Arctic Tiger Moth

Acerbia alpina

FAMILY

Tiger Moth (*Erebidae: Arctiinae*)

HABITAT

Inhabits dry rocky tundra. Nothing else is known about its biology.

DISTRIBUTION

Yukon: Known only from Herschel Island, but probably more widespread in northern and eastern mountains.

North America: Alaska, Yukon and only one other known location in Canada, the Tlogotsho Range in southwest NWT.

Global: Northern Scandinavia across northern Russia to Alaska, Yukon and NWT.

CONSERVATION RANK

Global: G3G4 (Vulnerable to Apparently Secure)

Canada: N2N3 (Imperilled to Vulnerable)

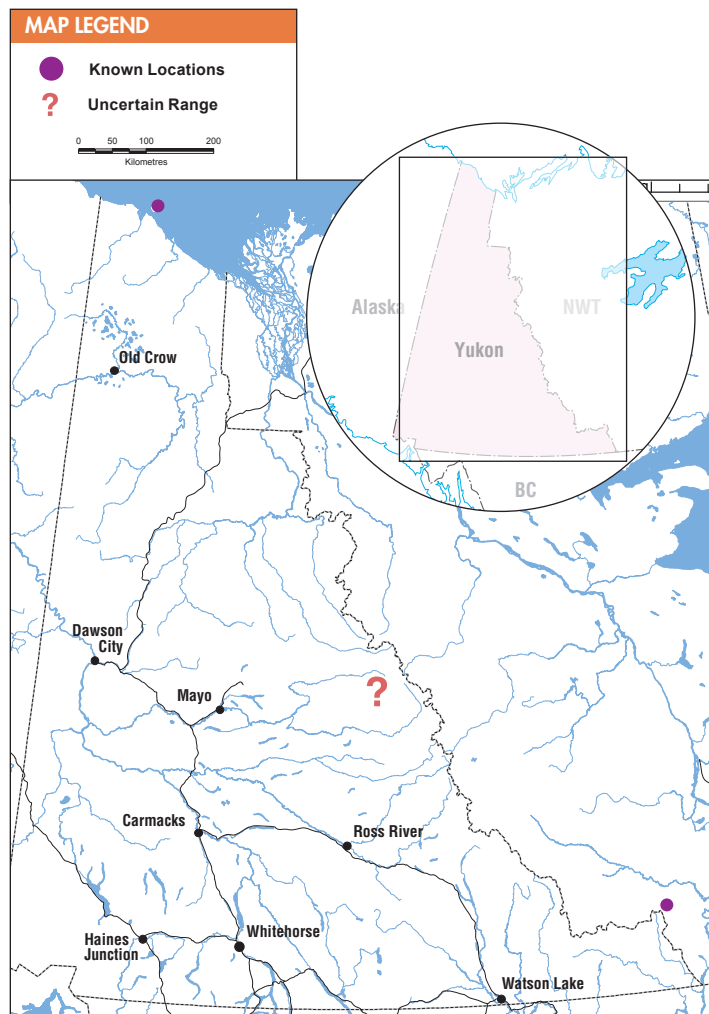
Yukon: S2S3 (Imperilled to Vulnerable)



Photo: Colin Gordon

DISTINGUISHING FEATURES

This large tiger moth is boldly patterned with yellow and black. There are no similar species in Yukon.



There are many rarely-seen, poorly-understood species of Tiger Moths in Yukon. To assist in documenting their distribution and life-history, Tiger Moth adults or caterpillars, and/or photographs can be provided to, Syd Cannings at Environment Canada (Syd.Cannings@ec.gc.ca) or Crispin Guppy at Ecofor Consulting Ltd. (cris@ecofor.ca) (both are in Whitehorse), together with location/date and GPS coordinates (if possible), notes/photos regarding habitat, and the plant species caterpillars were found on. Adult moths can be killed through freezing. Live moths or caterpillars can be stored in a plastic container in a cooler on ice (at 0-10°C) for a week or more. Under these conditions live moths (if female) will frequently lay eggs, which can then be reared to provide additional adults. Collecting/killing samples of rare moths will not adversely affect their populations – only a tiny proportion of the total population will be affected, as long as the habitat continues to exist. Photographs of all the known Yukon Tiger Moths are at www.cbif.gc.ca/spp_pages/noctuoidea/provinces/yt_e.php. Click on "Family Arctiidae."

Butterflies & Moths: Compton Tortoiseshell *Nymphalis l-album*

FAMILY

Brush-footed Butterfly (*Nymphalidae*)

HABITAT

Adults emerge from hibernation in May and frequent sunny, low elevation areas with abundant birch trees. The spiny caterpillars feed on the birch leaves, and pupation occurs by late July. Adults emerge in late July and later in August seek hibernation sites such as hollow trees, unheated buildings, and attics. Their abundance in Yukon and Alaska has apparently greatly increased over the past ten years.

DISTRIBUTION

Yukon: Southern Yukon.

North America: Central Alaska east to Newfoundland, south of the northern US states

Global: North America and Eurasia.

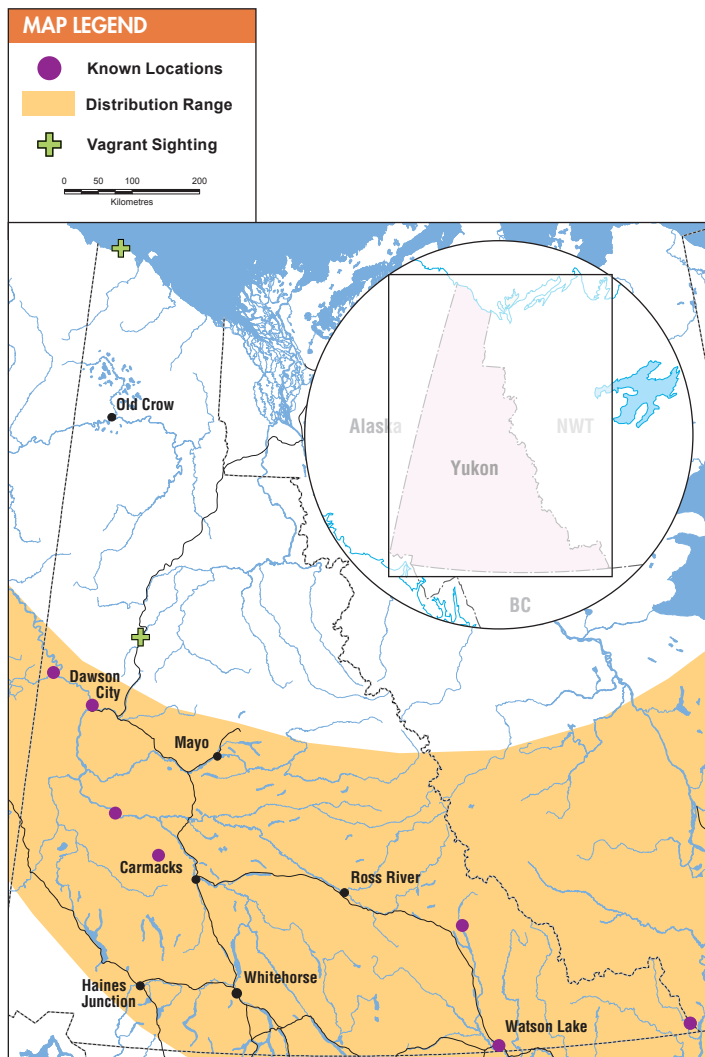


Photo: Cris Guppy

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5 (Secure)

Yukon: S3S4 (Vulnerable to Apparently Secure)

DISTINGUISHING FEATURES

Upperside of the wings orange-brown with black markings, with a white bar and white spots on each forewing. The underside of the wings is mottled grey-brown with a cryptic bark-like pattern and a white "comma" shaped mark. The anglewings (*Polygonia* species) are similar in appearance, but are smaller and do not have the white bar and spots on the forewings.



Photo: Bruce Bennett



Photo: Cris Guppy

Butterflies & Moths: Milbert's Tortoiseshell *Aglais milberti*

FAMILY

Brush-footed Butterfly (*Nymphalidae*)

HABITAT

Adults emerge from hibernation in May and are usually found in sunny, moist riparian areas that have the larval foodplant, Stinging Nettle. The blackish, spiny caterpillars can be found in masses on nettle leaves. In late July, newly-emerged adults migrate to sub-alpine and alpine meadows before returning in August to low elevations to find hibernation sites such as woodpiles or rock rubble.

DISTRIBUTION

Yukon: Southern Yukon.

North America: Yukon east to Newfoundland, south to Mexico in the west and the Appalachians Mountain in the east.

Global: Yukon east to Newfoundland, south to Mexico in the west and the Appalachians Mountain in the east.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5 (Secure)

Yukon: S3 (Vulnerable)

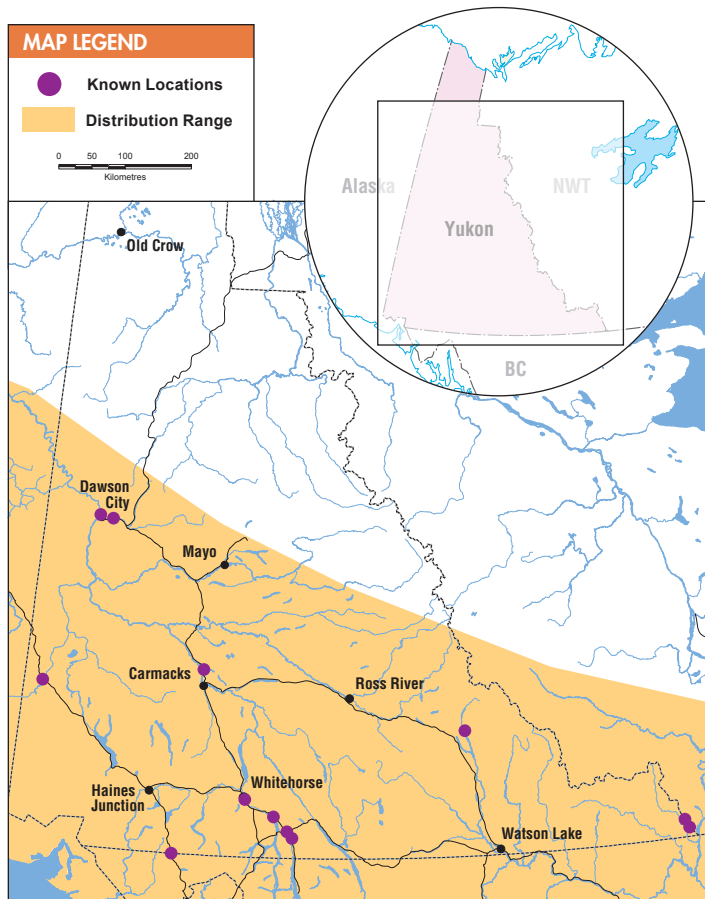


Photo: Cris Guppy

DISTINGUISHING FEATURES

The upperside of the wings is dark brown, with distinctive orange and yellow band across the middle of all four wings. The underside is mottled dark brown with a cryptic, bark-like pattern.



Photo: Cris Guppy



Photo: Kieran O'Donovan

Collared Pika

Ochotona collaris

HABITAT

Alpine and open subalpine talus slopes, with adjacent herbaceous vegetation for foraging.

DISTRIBUTION

Yukon: Wide-ranging in mountainous regions of Yukon.

North America: Alaska, Yukon, western NWT and extreme north-western BC.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5 (Secure)

Yukon: S4 (Apparently Secure)

COSEWIC Status: Special Concern (assessed 2011)

DISTINGUISHING FEATURES

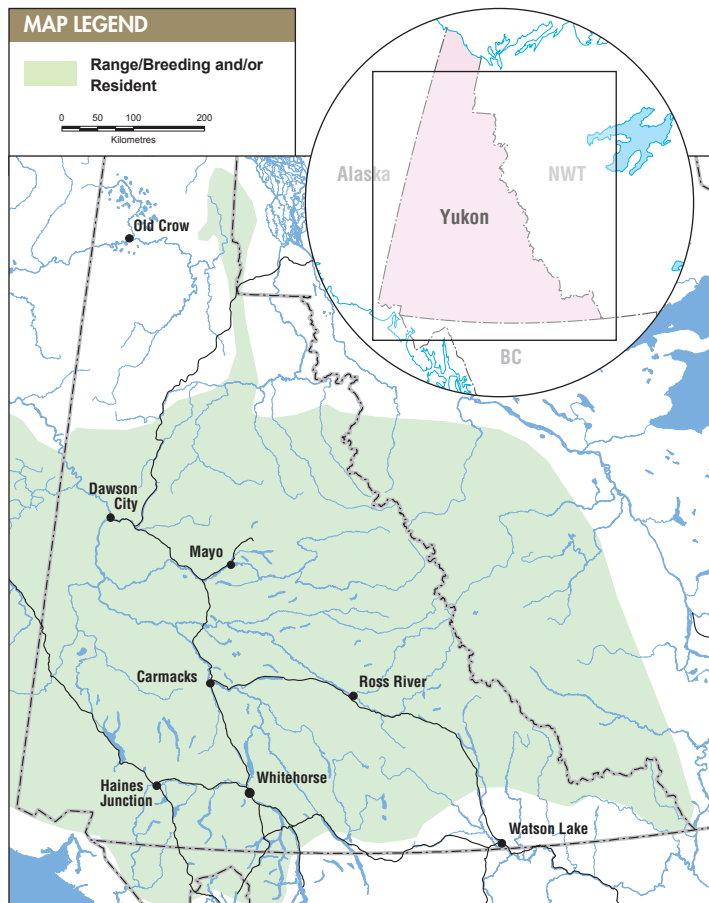
A weak "mleep" is often heard before the pika is seen amongst the boulders on a talus slope. Although they are related to rabbits, they look more like a big mouse.



Photo: Jared Hobbs



Photo: Ryan Agar



REPORT YOUR SIGHTINGS

Yukon Animals of Conservation Concern - March 2015

Mammals

Woodchuck

Marmota monax

HABITAT

Open forests, meadows, and road embankments.

DISTRIBUTION

Yukon: Widely but very sparsely distributed in the southern half of Yukon, especially in moister regions. Most records are from south-eastern Yukon, although there is a population in the Indian River area of the Klondike, Dawson City and Forty Mile. Woodchucks have historically been seen on the Haines Highway in Yukon.

North America: Widely distributed across Canada to Labrador and south into the northeastern USA.

CONSERVATION RANK

Global: G5 (Secure)

Canada: N5 (Secure)

Yukon: S3 (Vulnerable)

DISTINGUISHING FEATURES

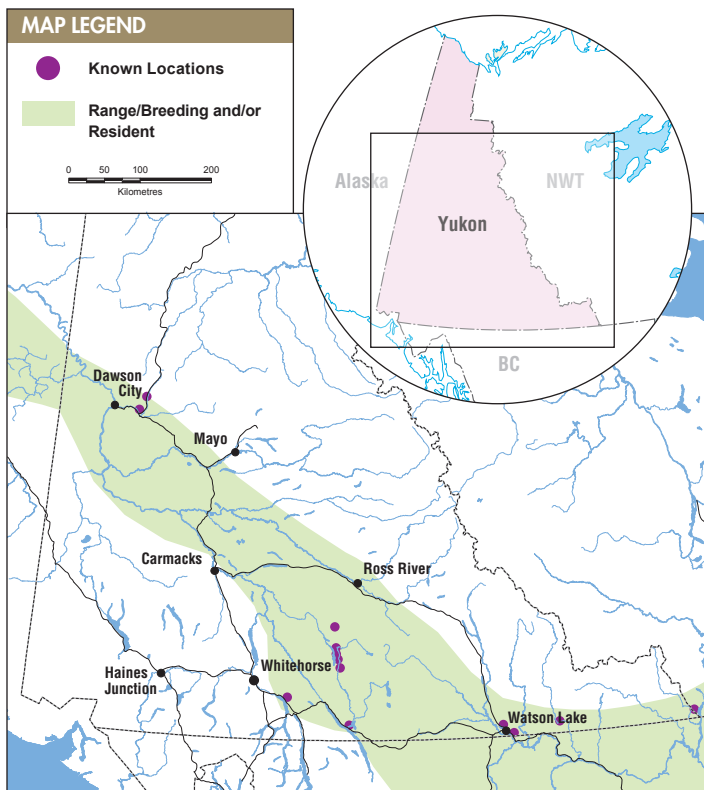
Woodchucks resemble large ground squirrels, that differ from their close relatives, Hoary Marmots, by being a frosted brown or red-dish-blond colour, rather than shades of grey and black. They are usually found at low elevations in well-drained open land; roadside meadows and fields are favourite spots.



Photo: ©iStock.com/David P. Lewis



Photo: Bruce Bennett



Environment
Canada
Canadian Wildlife
Service

Environnement
Canada
Service canadien
de la faune



Yukon Conservation
Data Centre

Yukon
Environment

Phone: 867-667-5331
Email: yukoncdc@gov.yk.ca
www.envyukon.gov.yk.ca/cdc

APPENDIX H: TABLE OF CONCORDANCE

TABLE OF CONCORDANCE

Reference No.	Proponent Commitment / Mitigation	Where addressed
YESAB R169	Details in the Wildlife Protection Plan will include provisions for checking for common nighthawk activity at sunset that could indicate the presence of nests prior to earthmoving around quarries or sand and gravel areas during prime nesting periods.	See Table 6-2, Section 4.6, and Appendix B (Protocol – Pre-Disturbance Breeding Bird Surveys) of the WPP
YESAB R172	The Wildlife Protection Plan is a living document and will be updated through implementation of the Adaptive Management Plan.	See Section 1.3 of the WPP
YESAB R179	Species-specific details (highlighting species of conservation concern) will be included in the final Wildlife Protection Plan. Unforeseen effects detected by ongoing monitoring will be managed through application of the Adaptive Management Plan.	See Chapters 2 and 6 of the WPP
YESAB R183f	The post-calving monitoring program will be modified to take GPS locations and pictures of the boundaries of a number of reference snow patches to help track snow patch changes over time.	See Table 7-1 of the WPP
YESAB R183i	All FCH winter range will be considered extremely important and management planning will include mitigation measures for wintering caribou in all years.	See Sections 3.3, 5.2, and 6.1 of the WPP
YESAB R203	Through the Adaptive Management Plan, if unanticipated changes are seen in the distribution and numbers of moose during the post rut and late winter surveys then further monitoring survey designs can be developed with Environment Yukon and RRDC to identify other sources of effects.	See Chapters 7 and 8 of the WPP
YESAB R233	An absence of collared pika observations in the wildlife logs would be a trigger to change the monitoring program through the Adaptive Management Plan.	See Sections 6.4 and 7.2 of the WPP
YESAB R238	Waterfowl use at water management facilities will vary by facility and purpose, and details will be finalized in the Wildlife Protection Plan (as part of licensing). In general, the BC Resource Inventory Committee, Standards for Components of British Columbia's Biodiversity No. 18, Inventory Methods for Waterfowl and Allied Species (1999) or similar updated protocol will be followed. For water management facilities that are part of the mine site infrastructure (other than those where waterfowl access is controlled), waterfowl will be monitored with a total count from an observation station to determine presence/absence.	See Table 7-1 and Table 8-1 of the WPP
YESAB R238	Waterfowl monitoring of the fish habitat ponds (which will be constructed as part of the Fish Offsetting Plan), more than one observation station will be set up and a total count survey will be completed. This will preferably occur in the spring nesting period and will be integrated into the program described in the FOP. Determining presence is the main objective of this program.	See Table 7-1 and Table 8-1 of the WPP
YESAB R240	Buffer zones for cliff nesting raptors will be updated and defined for specific species in the final Wildlife Protection Plan and will follow Environment and Climate Change Canada and Yukon guidance. The Yukon standard for the no disturbance buffer for cliff-nesting is 300 m (Yukon Energy Mines and Resources 2014). In Yukon, cliff-nesting raptors occupy nests around the 15th of March – the 31st of April (Hayes and Reid 2014). If helicopter flights are necessary near cliff-nesting raptor nests between this period, BMC will avoid repeat aerial	See Table 6-1 and Table 6-2 and Sections 6.3 and 6.3.1 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
	disturbance, where practicable. Routine flights during this period will be as far away as are safe and practical. In addition, approach to nests would be along a tangential visible path to avoid approaching cliff nests from behind.	
YESAB R244b	Equipment laydown areas will be distant from known wildlife trails or wildlife road crossings. The distance will be finalized during final design on a case-by-case basis depending on the specific trail, topography, and borrow material location.	See Section 4.2 of the WPP
YESAB R244e	The tasks for implementing and monitoring the WPP effectiveness will be overseen by BMC's Environmental Manager. Tasks include: 1. Ensuring that the WPP is adhered to through internal auditing; 2. Wildlife observation reports and incident reports will be compiled and reviewed regularly to identify and implement required corrective actions on a regular basis; 3. Annual review of monitoring data and incident reports to determine if modifications are required to the WPP through the adaptive management plan (metrics are the expected changes and thresholds included in the effects assessment); 4. Regular review of site inspection records including, but not limited to, waste storage and disposal, security of attractants; 5. Review of employee and contractor recommended modifications to improve wildlife protection procedures; and 6. Liaising with the Kaska, regulatory agencies, regional biologists, Conservation Officers, and local communities regarding wildlife issues.	See Sections 1.5, 1.6, 1.7, 7.1, 7.2, and Chapter 8 of the WPP
YESAB R244e	As more information is gathered through monitoring the presence and behaviour of wildlife interactions with the KZK Project and personnel, additional mitigation measures may be developed and integrated into the WPP.	See Sections 1.3, 1.5, 1.6, 7.1, 7.2, and Chapter 5 of the WPP
YESAB R246	Sensitive Seasonal Periods for Focal Wildlife and Mitigations, in the Project Proposal suggested a minimum 15 m buffer around identified nesting. Buffer zones will be updated and defined for specific species in the final Wildlife Protection Plan and will follow Environment and Climate Change Canada and Yukon guidance. The regional nesting period of birds in the Yukon is early May to late August (Environment Canada and Climate Change Canada, 2017). If active migratory bird nests are found or suspected within the active Project area, a suitable no-disturbance buffer zone, based on species, level of disturbance and surrounding area, will be established. If a suitable buffer zone is unable to be established or followed, activities will be postponed until nesting is complete. For non-migratory birds, suitable buffer zones will also be established. For non-migratory birds, if the buffer zone is unable to be followed, written permission may be obtained from Environment Yukon to disturb nests (YESAB, 2016). Instead of trying to directly locate nests, a non-intrusive search method will be applied. This method searches for evidence of nesting by observing the presence of birds, alarm calls, distraction displays, ideal nesting habitat, etc. to determine whether there are likely nesting birds in the area. Several specific recommended buffers are as follows: 1. The recommended buffer for the Olive-sided Flycatcher is 300m at high disturbance, 150m at medium disturbance, and 50m at low disturbance (Environment Canada 2009). 2. For the Trumpeter Swan, the recommended buffer is 800m at all disturbance levels set by the Alberta Sustainable Resource Development (Alberta Sustainable Resource Development 2011).	See Section 6.3 and Appendix B (Protocol – Pre-Disturbance Breeding Bird Surveys) of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
YESAB R2-85a	General wildlife road crossing areas have been identified in the Draft Wildlife Protection Plan (including mitigation measures) and additional precautions will be taken as more specific migration path data in relation to the Project area becomes available during the operational phase of the Project through the ongoing monitoring program and wildlife logs as presented in the Wildlife Protection Plan.	See Sections 4.2, 5.2, 7.1, and 7.2 of the WPP
YESAB R2-87	Training of transport contractors by BMC will also include information and procedures to alert drivers to the higher potential for caribou and to maintain slower speeds in winter in these key areas. Driver training and information specific to the Little Rancheria and Horseranch Caribou Herds are included in the Wildlife Protection Plan.	See Sections 3.2, 4.2, 5.2.1, 5.2.2, and 6.1 of the WPP
YESAB R2-90	Indirect measures of wildlife health will include the air quality, soil quality and water quality monitoring programs that will be implemented to ensure air quality, soil quality and water quality protection measures are working effectively and contaminants are not entering the receiving environment in concentrations that would be a risk to wildlife health. In addition, the programs to monitor wildlife use of habitat around the Project will be used as indirect measures of the health of the wildlife populations that could result from displacement to less favourable habitat and/or changes in energy use by animals avoiding mine activities.	See Sections 7.1, 7.2, and 7.3 of the WPP and the Environmental Monitoring, Surveillance, and Reporting Plan (in progress)
YESAB R2-90	From experience on mine sites, personnel often see the same wildlife frequenting the Project area, and notes on animal health in the wildlife logs can be used to help identify changes to an animal's condition over time. The wildlife observation cards currently used in exploration and will continue to be used for the wildlife logs include a space to record the condition and behaviour of the animals.	See Sections 7.2 and 7.3 of the WPP
YESAB R2-90	Yukon Government also monitors parasites and infection diseases of Yukon caribou herds (Hegel and Russell 2013), which may be a source of reference during the implementation of the Wildlife Protection Plan. Other sources that can be used to identify changes to wildlife condition can come from trappers, guide outfitters, and First Nations carrying out traditional activities around the Project.	See Section 7.3 of the WPP
YESAB R3-8	The monitoring and adaptive management program and triggers in the draft Wildlife Protection Plan will be updated through ongoing discussions with Kaska, commitments made during the environmental assessment process and eventually the requirements from the Yukon Environmental and Socio-economic Assessment Act (YESAA) Decision Document.	RRDC/Dena Cho had the opportunity to review and contribute to all management plans prior to them being finalized and submitted to EMR. See Sections 1.5 and 1.6 of the WPP
YESAB R4-2	Any additional land use information with respect to wildlife that is made available by LFN in the future will be incorporated into BMC's management and operating plans at that time.	See Sections 1.5.2 and 1.6 of the WPP
YESAB R4-4	Wildlife is unlikely to access the water collection ponds or water management ponds as they will be fenced.	See Section 4.4 of the WPP
YESAB R6-2	Monitoring, triggers, and corresponding actions related to the adaptive management plan for caribou were updated in response to Information Request R3-8 (BMC Minerals Ltd. 2018). These updates will be included in the Wildlife Protection Plan that will become a component of the Project's Quartz Mining Licence.	See Chapters 7 and 8 of the WPP
YESAB R6-4	For caribou movement, monitoring will include aerial surveys, wildlife records program and incident reporting. If there are changes in the FCH distribution from aerial surveys (statistically significant change in distribution based on year on year analysis of distribution of groups and individuals relative to the Project; and review of the number and types of caribou encounters and incidents over time). An analysis will be done to assess if the reduction of sightings is due to reduced reporting, and if so the wildlife recording program will be strengthened. If the root cause is traffic, traffic patterns will be modified to allow for longer periods without traffic during movement periods.	See Chapters 7 and 8 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
YESAB R6-9	Through the adaptive management program, BMC will continue to review additional mitigation and management strategies that are being carried out throughout the world to conserve biodiversity as the climate changes. Some strategies to assist with biodiversity adaptation to climate change might include reducing threats, additional monitoring and studies, modelling, relocation, and improved integration and coordination between all parties interested in and responsible for conservation (Heller and Zavaleta 2009). BMC is also committed to carrying out the ongoing caribou monitoring program for the Project, and to working with Kaska and the Yukon Government on programs to help manage and maintain the FCH population given the challenges of a changing climate.	See Chapters 7 and 8 of the WPP
RRDC Adequacy Review R-5	The RRDC Elders Oversight Committee suggested that BMC could initiate some flying limitations around key caribou & sheep calving periods. BMC is currently investigating this matter and believes that some form of voluntary restriction for helicopters (particularly to the south and west of the Project area) can be accommodated during the calving season.	See Section 5.2.3 of the WPP
RRDC Adequacy Review R-6	RRDC Elders have suggested that BMC might consider such matters as restrictive flying times/areas during key periods such as calving and particularly to the south and west of the mine. BMC confirms it is prepared to do this.	See Section 5.2.3 of the WPP
RRDC Adequacy Review R-7	Mitigation measures for noise are presented in Section 18.10.3 of the Project Proposal and are reproduced below: • Equipping facility related vehicles including heavy and light trucks with appropriate mufflers; • Ensuring all internal combustion engines are fitted with appropriate muffler systems; • Ensuring regular equipment maintenance, including lubrication and replacement of parts by following manufacturer's recommendations; • Keeping noisy equipment inside of buildings and sheds whenever practicable; • Adhering to BMC's blasting management protocols that include controlled blasting procedures and optimizes blasting operations, maximizes localised rock breakage and minimizes non-productive noise, vibration and flyrock effect; • Imposing speed limits for all vehicles (Section 18.12 of the Project Proposal - Traffic and Access Management Plan); • Avoiding engine idling (where practicable); • Maintaining Project roads regularly to minimize vehicle noise associated with vibration; and • Considering noise control factors when procuring equipment. The Wildlife Portion Plan outlines important timing windows where work will be minimized in alpine and subalpine areas during key periods for caribou and around nesting grounds in spring to minimize disturbance (from noise and other sensory disturbance).	See Sections 3.2.1, 3.3, 4.1, 4.6, 5.1.3, 5.2.1, 5.2.2, and 5.3 of the WPP
RRDC Adequacy Review R-15b	Potential changes in biodiversity will be monitored through species richness. Indeed, bird diversity has been observed to be maintained after reclamation at other mine sites with restored wetland habitat (Lacki et al. 2004, Howie 2006) which BMC would seek to emulate.	See Chapter 8 of the WPP
RRDC Adequacy Review R-17 and 19d	BMC would like to reassure RRDC of the commitments made in the Traditional Knowledge protocol (i.e. that the Kaska assessment of potential effects and recommended mitigation measures will be developed by the RRDC Traditional Knowledge Team and presented to BMC for consideration and implementation).	See Sections 1.5 and 1.6 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
RRDC Adequacy Review R-19b and c	Culturally important species and species with conservation status will be included with species-specific details in the Wildlife Protection Plan that will be finalized through engagement with RRDC.	See Sections 2.3, 2.4, 2.5, and Chapter 6 of the WPP
RRDC Adequacy Review R-23	The Wildlife Protection Plan is a living document and will be updated through the adaptive management program if unexpected effects on small mammals or other wildlife are detected.	See Section 1.3 and Chapter 8 of the WPP
RRDC Adequacy Review R-24	BMC must comply with the Migratory Birds Convention Act and commits to this through addressing effects on individual species at risk in the Wildlife Protection Plan.	See Sections 1.4.1 and 6.3 of the WPP
RRDC Adequacy Review R-28 and R-40	FCH annual post-calving and rut surveys will continue, combined with observations and notes on health to help track changes through time.	See Chapter 7 of the WPP
RRDC Adequacy Review R-54	Blasting will occur in the open pit and on a regular schedule, likely once at the same time each day or every second day.	See Sections 4.6 and 5.3 of the WPP
RRDC Adequacy Review R-54	The haul road will be left in the pit to facilitate wildlife exiting the ABM lake if they accidentally fall in.	See Section 4.4 of the WPP
RRDC Adequacy Review R-54	An Adaptive Management Plan will be implemented. It is BMC's intent that the Wildlife Protection Plan would be developed with RRDC through the proposed collaborative and cooperative program. The Adaptive Management Plan will review the implementation of mitigation measures and monitoring results so that additional mitigation measures can be carried out for any unexpected effects.	RRDC/Dena Cho had the opportunity to review and contribute to all management plans prior to them being finalized and submitted to EMR. See Sections 1.5, 1.6 and Chapter 8 of the WPP
RRDC Adequacy Review R-55	Detailed monitoring and Adaptive Management Plans will be developed during permitting (i.e. during the Type A Water Licence and Quartz Mining Licence application processes). Conditions, locations, periods etc. will be prescribed in these plans and licences.	See Chapters 7 and 8 of the WPP
RRDC Screening Review (Wildlife)	In July 2017, a photographic monitoring program was initiated, which established five snow patch monitoring stations in the regional study area, including one in the local study area where snow patches are found. The photographic monitoring program will help identify the stability of the snow pack in the regional survey area over the years.	See Table 7-1 of the WPP
RRDC Screening Review (Wildlife)	BMC remains committed to minimizing effects and working with Kaska in a collaborative manner to revise details of the Wildlife Protection Plan on an ongoing basis to allow for safe mine operation and minimize effects on wildlife.	RRDC/Dena Cho had the opportunity to review and contribute to all management plans prior to them being finalized and submitted to EMR. See Sections 1.5, 1.6 and Chapter 8 of the WPP
RRDC Screening Review (Wildlife)	BMC understands that RRDC has a formal land use plan that was finalized in 2015 which identifies mitigation measures for wildlife. BMC has not been provided a copy of this, but when/if this is provided BMC will review these mitigations and consider them in any future design modifications, management plans, and/or operating changes that are deemed appropriate.	See Sections 1.5 and 1.6 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
RRDC Screening Review (Wildlife)	BMC has proposed a BMC-Kaska Environmental, Cultural & Heritage Management Program for KZK. Through this program it is anticipated that RRDC will collaboratively design, collect, report, and communicate the results of the wildlife monitoring programs to RRDC citizens. This program would be active through all Project phases and would collaboratively ensure any impacts to the traditional use animals are minimized.	See Sections 1.5 and 1.6 and Chapter 7 of the WPP
RRDC Screening Review (Wildlife)	In 2017 BMC and RRDC entered into a Traditional Knowledge Protocol agreement which sets out obligations for each party regarding the collection and sharing of TK. This agreement outlines a process whereby as part of the TK study RRDC will provide mitigation measures to reduce project impacts. When new TK is shared, both parties will collaboratively identify any new potential effects as well as any additional mitigation measures that may be required based on the new information. This information will be used in any future design modifications, management plans, and/or operating changes that are deemed appropriate.	See Sections 1.5 and 1.6 of the WPP
RRDC Screening Review (Wildlife)	BMC agrees that the details for the Wildlife Monitoring program would need to be developed with RRDC, Yukon Government and potentially other proponents and stakeholders, given that the FCH needs to be managed at a territorial level rather than on a project specific basis.	See Sections 1.5, 1.6 and Chapter 7 of the WPP
BMC Response to Public Comments on the DSR	BMC is fully supportive of the broader study and management planning for the Finlayson Caribou Herd. BMC has had independent discussions with both RRDC and Yukon Government (with respect to a multi-party Finlayson Caribou Herd working group) and both parties have indicated a willingness for BMC to participate when needed; but have indicated that the initial planning should be between First Nation governments and Yukon Government.	See Sections 1.5 and 1.6 of the WPP
BMC Response to LFN Comments on DSR	The Conceptual Wildlife Management Plan (Appendix R2-J of Response Report #2 (BMC, 2017b) will be updated and submitted as part of BMC's licence applications.	See the Wildlife Protection Plan
BMC Response to LFN Comments on DSR	BMC remains committed to continue to seek engagement with all parties interested in the Project, including LFN and has invited LFN to meet to discuss how this might best be achieved not only in preparation of the management plans but throughout the Project life.	See Sections 1.5 and 1.6 of the WPP
BMC Response to LFN Comments on DSR	Although LFN has yet to provide the FCH information that it is requesting to be considered, BMC has committed to working collaboratively with LFN and other parties once this information is available. It is possible that this collaboration will occur post environmental assessment as there is no confidence or certainty in when the information will be provided. BMC looks forward to considering this data carefully and collaboratively whenever it is provided and if new data supports it, BMC will revise and amend the various management plans as required.	See Sections 1.5 and 1.6 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 13 (BMC, 2017a) A Draft Detailed Wildlife Protection Plan was submitted as Appendix R2-J of Response Report 2 (BMC, 2017c).	The Wildlife Protection Plan is the primary document that BMC will use to implement wildlife and wildlife habitat protection. In addition, the following conceptual management plans (presented in the Project Proposal) outline mitigation measures to further minimize impacts on the Wildlife and Wildlife Habitat Valued Component: • Waste Management Plan (Section 18.2); • Spill Contingency Plan (Section 18.5); • Hazardous Materials Management (Section 18.3); • Traffic and Access Management Plan (Section 18.12); • Noise Management Plan (Section 18.10); and • Air Quality Management Plan (Section 18.11). The detailed management plans will be submitted to the appropriate licensing agencies and will become conditions of the respective licenses.	In addition to the WPP, 17 other management plans have been submitted to EMR to support BMC's QML Application. Each of these plans have management practices to further minimize impacts on wildlife and wildlife habitat.
Project Proposal (BMC, 2017a)	BMC's main policies related to wildlife protections include: • Environment Policy (Appendix A-4); • No Firearms Policy (Appendix A-8); and • No Feeding of Animals Policy (Appendix A-9).	See Section 1.3 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	The following are general mitigation measures to reduce or eliminate Project effects on all wildlife species during all Project phases: • The Project Footprint was designed to cover as little area as practicable to minimize habitat loss and disturbance; • Clearing will be kept to a minimum and only include areas needed to safely construct and operate the Project; • Adhere to the policy of no feeding, harassment, or hunting of wildlife by employees and contractors; • Present a wildlife protection component in employee, contractor, and visitor orientation/induction program to communicate wildlife policies, safety, and protection measures; • Avoid construction in and around sensitive areas, such as calving grounds, raptor nesting sites, den sites, or mineral licks during important seasonal periods (where practicable; the only known nearby mineral licks are south of the Project Footprint as noted in the ethnographic summary in Appendix F-3 of the Project Proposal); • Sensory disturbances will be minimized where practicable throughout the year; • Fugitive dust will be controlled using water sprays or approved dust suppressant (environmentally-benign that do not contain salts that would attract wildlife) to minimize the Project's zone of influence over the surrounding landscape (including passerine habitat); • Regularly scheduled blasting; • Progressive reclamation; and • Reclaim the Project areas at closure to return the area to existing habits (where practicable) (Appendix H-1 of the Project Proposal).	See the following Sections of the WPP: • Chapter 4 • Chapter 4 • 1.3, 3.2.1, 5.1.1, 5.5 • 3.2 • 3.3 • 3.3 and Chapters 4, 5, and 6 • 4.2.2 • 5.3 • 4.5 • 4.5 and Chapter 8

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 13 (BMC, 2017a)	The following are general mitigation measures to reduce or eliminate Project effects on all wildlife species resulting from use of the Access Road during all Project phases: • Keep snowbanks less than one-metre high and provide wildlife passageways through banks along the Access Road and around site roads; • Breaks in snowbanks will be placed every 50 m to 100 m on both sides of the Access Road to enable passage of large mammals; • Road embankments will be low profile to prevent the road acting as a barrier to, or channel for, wildlife movement; • Enforce vehicle speed limits on employees and contractors and use radios to report wildlife on roads to reduce the incidence of collisions; • Travel speeds along the road will be restricted to a maximum of 50 km/h for daytime travel, and reduced during night-time or hazardous weather conditions (as appropriate); • Radio controlled Access Road; • Minimum traffic levels will be maintained along the Access Road to the extent practical. Convoys of 2 or 3 vehicles will travel together along the Access Road to reduce periods of sensory disturbance, when practicable; • Clearing vegetation from right-of-way; • Implement protocol for vehicle-ungulate encounters; • Signage will be posted in high collision risk areas (e.g., blind or obstructed turns, water and wildlife crossings; current known areas are present in Figure 18-5 of the Project Proposal). Road travel speeds will be reduced to 30 km/h in these areas. The signs will instruct drivers to reduce speed, remain alert, stop for wildlife, and wait for wildlife to move away (Figure-18-6 of the Project Proposal). Wildlife will have the right-of-way along the road; • Individual or groups of animals standing on the road will be allowed to move off the road unalarmed; • Wildlife incidents (e.g., collisions) will be reported within 24 hours or as soon as practicable, and an investigation will try to identify the cause and remedial actions; • A guard at the gatehouse on the Access Road is in place to prevent public and hunter access. The gatehouse will continue to be guarded throughout the Project phases to restrict hunter access to the Project area; • Decommission and reclaim Access Road; and • All other requirements currently included in the existing Tote Road Licence.	See the following Sections of the WPP: • 4.2.2 • 4.2.2 • 4.2.2 • 4.2 • 4.2 • 4.2 • 5.2.1 • 4.2.2 • 5.2.1 • 5.2.1 • 5.2.1 • 5.2.1, 5.4, 7.2 and Chapter 8 • 4.2.1 • 4.5 • 1.5, 1.6, Chapter 4, 5.1, 5.2, 7.2
Project Proposal Chapter 13 (BMC, 2017a)	Minimize activities in alpine and subalpine during caribou rut period (September 28 to October 31).	See Sections 3.3 and 6.1.1 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	Minimize activities in alpine during the caribou calving period (May 1 to May 31).	See Sections 3.3 and 6.1.1 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 13 (BMC, 2017a)	Fencing or provision of egress ramps from high-density polyethylene lined facilities.	See Section 4.4 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	Clearing of the Overburden Stockpile, Class A, B, and C Facilities will be progressive, to minimize total area of disturbance at any given time.	See Section 4.3 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	Class A Storage Facility will be progressively reclaimed, to minimize total area of disturbance at any given time.	See Section 4.5 of the WPP
Project Proposal Chapter 18 (BMC, 2017a) Response Report #1 BMC, 2017b)	Equipment laydown areas will be distant from known wildlife trails or wildlife road crossings. The distance will be finalized during final design on a case-by-case basis depending on the specific trail, topography, and borrow material location.	See Section 4.2 of the WPP
Project Proposal Chapter 18 (BMC, 2017a) and BMC Response to Draft Screening Report (BMC, 2020)	Ancillary facilities including Waste Management Facility, Upper and Lower Water Management Ponds, and all water collection ponds with engineered liners will be surrounded by wildlife proof fences and emergency egress ramps will also be installed. If conditions are warranted, the camp shall be enclosed with wildlife proof fencing. Warranted conditions will be developed in consultation with the Conservation Officer and include site-specific bear activity.	See Section 4.4 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	Leave haul road in pit to provide egress from ABM lake.	See Section 4.4 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	Follow designated flight and landing route for flights to Finlayson Lake airstrip during winter that stay 1.5 km away from animals and maximize height above ground if practicable at landing and takeoff.	See Section 5.2.3 of the WPP
Project Proposal Chapter 13 (BMC, 2017a)	The following are general mitigation measures for waste management for the Project to reduce human-bear conflicts (Waste Management Plan is presented in Section 18.2 of the Project Proposal): - BMC will provide bear awareness training to all employees and contractors; - Site personnel will not attempt to handle nuisance or problem wildlife without specific direction from the Conservation Officer (district office in Faro 867-994-2862 or Watson Lake 867-536-3210);	See the following Sections of the WPP: 3.2, 5.4, 6.2 3.2.1, 5.4, 7.2 5.4, 7.2 and Chapter 8

Reference No.	Proponent Commitment / Mitigation	Where addressed
	- Wildlife interactions (e.g., traffic accidents) and nuisance or problem animals will be reported to the Environmental Manager immediately. Observations of wildlife behaving abnormally will be reported in 24 hours; - The harassment of wildlife is prohibited under the Yukon Wildlife Act. Attempts to chase, catch, divert, follow, or otherwise harass wildlife by on-road or off-road vehicles, boats, aircraft, or on foot will not be permitted at any time; - Personal wildlife deterrents (e.g., air horns, bear spray, bear bangers) will be issued and carried by all field personnel, as well as functioning radios. Training on wildlife deterrents will be completed prior to issuance and use. Workers will follow scheduled check-in times; - BMC will be responsible for the regular collection and disposal of all waste material generated during the course of the Project; - BMC will establish regular clean-up and disposal programs to prevent the unnecessary accumulation of wastes; - Procedures will be adopted to promptly collect and remove any accumulated debris; - BMC will ensure these wastes are stored in suitable containers until such time as they are removed from Project or incinerated; - All waste removed from Project will be disposed of at an approved disposal facility, in compliance with applicable legislation and regulations; - All food waste and domestic garbage from all Project areas will be collected and placed in an appropriate receptacle daily, and will be disposed of in an appropriate and safe manner; - All food wastes will be stored and disposed of in a manner that does not attract nuisance animals, and will be incinerated daily; and - The waste management facility will be surrounded by a wildlife barrier.	3.2.1, 5.2, 5.4, 3.2.1, 3.2.4, 5.4, 6.2 5.1.2 5.1.2 5.1.2 5.1.2 5.1.2 5.1.2 5.1.2 4.4
Project Proposal Chapter 13 (BMC, 2017a)	Prevent creation of new nest sites (i.e. during the nesting season inspect for old nests including (including but not limited to) inspection of tall inactive equipment (i.e. crane booms) and building ledges under eaves.	See Section 6.3 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
Project Proposal Chapter 13 (BMC, 2017a)	As much as possible, land clearing will occur outside the nesting season. If land clearing is to be conducted during the nesting season, breeding bird surveys will be conducted prior to clearing and active nests will be buffered. This is required to ensure compliance with the Migratory Birds Convention Act 1994, which prohibits the disturbance or destruction of migratory bird nests and eggs in Canada. The following items will be applied while conducted breeding bird surveys: • Surveys will be led by qualified and experienced individuals (including involvement from Kaska representatives identified by RRDC); • Survey results will be communicated to the on-site construction manager and clearing contractors, including any nests found and ensuing buffer zones; • Any nest found will be protected with a buffer zone. Buffer zones vary depending on the species and the type of disturbance and will be determined by the expert contracted for clearing. Buffer zones are species dependent and are presented in the Wildlife Protection Plan. The buffers can be removed after the young have permanently left the nest; • If no nests are found, clearing activities will be completed within a 3-day window of survey conclusion; and • A summary of results and proposed mitigation are to be provided to RRDC for their input and feedback.	See Sections 1.5, 1.6, 4.3, 6.3, 7.2 and Appendix B (Protocol – Pre-Disturbance Breeding Bird Surveys) of the WPP
Response Report #1 (BMC, 2017b)	The Yukon standard for the no disturbance buffer for cliff-nesting raptors is 300 m. In Yukon, cliff nesting raptors occupy nests around the 15th of March to the 31st of April. If helicopter flights are necessary near cliff-nesting raptor nests between this period, BMC will avoid repeat aerial disturbance, where practicable. Routine flights during this period will be as far away as are safe and practical. In addition, approach to nests would be along a tangential visible path to avoid approaching cliff nests from behind.	See Table 6-1 and Table 6-2 and Sections 6.3 and 6.3.1 of the WPP
Response Report #3A (BMC, 2018a)	The diversion of Fault Creek during construction and at closure will be scheduled to minimize fluctuations during nesting periods as much as practicable (ideally during the late fall or through the winter).	See Section 4.3 of the WPP
Response Report #2 (BMC, 2017c)	The transportation route goes through the range of the Little Rancheria and Horseranch caribou herds in southeast Yukon and northern BC near Watson Lake, Alaska Highway, and the north end of the Stewart-Cassiar Highway. Mitigation measures are already in place in high collision areas and include cautionary signage at high incidence areas along the road that ask motorists to slow down and stay alert during key seasons of caribou use. Training of transport contractors by BMC will include information and procedures to alert drivers to the higher potential for caribou and to maintain slower speeds in winter in these key areas. Driver training and information specific to the Little Rancheria and Horseranch Caribou Herds is included in the Wildlife Protection Plan.	See Sections 3.2, 5.2.1, 5.2.2, and 6.1 of the WPP
Project Proposal Chapter 18 (BMC, 2017a)	Clearing of the Overburden Stockpile, Class A, B, and C Facilities will be progressive, to minimize total area of disturbance at any given time.	See Section 4.3 of the WPP
Project Proposal Chapter 15 (BMC, 2017a)	• All firearms are prohibited unless otherwise authorized by BMC management (Appendix A-8 of the Project Proposal); • All hunting of wildlife or recreational shooting by employees, contractors and visitors is strictly prohibited, as outlined in the No Firearms Policy (Appendix A-8); this policy will be communicated to all employees and contractors during the site orientation;	• See Sections 1.3, 3.2.1, and 5.5 of the WPP • See Sections 1.3, 3.2.1, and 5.5 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
	- Recreational use of all-terrain vehicles (ATVs) and snowmobiles are prohibited (Appendix A-11 of the Project Proposal); - 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;	- See Sections 1.3, 3.2.1, and 4.2 of the WPP - See Sections 1.3, 3.2.1, 4.2, and 5.5 of the WPP - See Sections 1.3 and 5.2 of the WPP and the Traffic Management Plan (BMC, 2026d)
Response Report #4A (BMC, 2018b)	Terrain and Soils - BMC has established No Recreational Use of ATVs and Snowmobiles Policy. This policy will (in part) ensure that terrain in the region of the Project (which is used for traditional activities) is not impacted by BMC employees or contractors. This policy is included in Section 1.2.2 of the Project Proposal.	See Sections 1.3, 3.2.1 and 4.2 of the WPP
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat - In order to minimize the effects on wildlife and wildlife habitat, BMC has minimized the Project footprint so that all Project infrastructure is confined to one watershed. By minimizing the impact to the habitat, the effects on the land users who use the land base for hunting the wildlife are also reduced.	See Section 4.3 of the WPP
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat - Potential impacts to the Finlayson Caribou Herd during their annual migration route to their winter range has been raised as one of the main concerns of the RRDC Elders Oversight Committee. The primary risk is the potential for vehicle collisions along the Access Road when the animals are migrating. Mitigation measures to reduce this potential effect are: - Wildlife will have the right-of-way along the entire Access Road; - If caribou are encountered on the road, the equipment and/or activity is to be halted until the wildlife has left the immediate area; - Radio communication among road users will be required to communicate information such as sightings of caribou; - The road will be plowed so that snowbanks are less than 1 m in height; - All wildlife observations on access road will be reported; - Breaks in snowbanks will be placed on both sides of the road to enable passage of large mammals; and - 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. Additional mitigation measures to reduce the potential effects on this important traditionally harvested species is included in the Wildlife Protection Plan (Appendix R2-J of Response Report #2) (BMC, 2017c).	See the following Sections of the WPP: 5.2.1 5.2.1 and 5.2.2 5.2 4.2.2 7.1 and 7.2 4.2.2 4.2.2 and 6.1
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat - It is understood that game birds are an important food source for the RRDC traditional land users. During construction BMC will avoid clearing during the breeding bird window (May 1st to August 15th), where practicable. This avoidance measure will ensure the populations of game birds used for traditional purposes are not impacted from Project activities. If construction during the breeding bird window cannot practicably be avoided, BMC has proposed nest surveys to be completed prior to clearing and if nests are identified (by the qualified and experienced person in collaboration with an RRDC/LFN Kaska representative) an avoidance buffer will be placed around the nest (buffer area will depend on the species) and no clearing will take place until the young have permanently left the nest. A summary of the survey results and proposed mitigation are to be provided to RRDC/LFN Kaska for their input and feedback. This mitigation measure will ensure the populations of game birds used for traditional purposes are not impacted from Project activities. More detailed information is presented in Section 13.4.2 of the Project Proposal and in the Wildlife Protection Plan (Appendix R2-J of Response Report #2) (BMC, 2017c).	See Sections 1.5, 1.6, 4.3, 6.3, 7.2 and Appendix B (Protocol – Pre-Disturbance Breeding Bird Surveys) of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat - Increased hunting pressure has been raised as one of the key factors impacting RRDC's ability to harvest caribou and moose in their traditional territory. The most important mitigation measure that BMC will continue to implement is the operation of the manned gate to prevent hunter access to the Project (as per the lease requirements for the road). This is a proven mitigation measure which will continue for the life of the Project until the road is decommissioned and reclaimed. With this mitigation measure the KZK project will prevent overhunting and subsequent impacts to traditional land use activities.	See Sections 1.3, 3.2.1, 4.2.1, 5.2.1 and 5.5 of the WPP
Response Report #4A (BMC, 2018b)	Wildlife and Wildlife Habitat -BMC's wildlife monitoring program will focus on identifying changes to wildlife use and movement patterns resulting from Project development and operations. Traditional knowledge and scientific research will be integrated as it becomes available to help in the interpretation of ongoing monitoring data. In general, where possible and interest exists, one to two RRDC/LFN Kaska Land Stewards and/or Traditional Knowledge Team with RRDC/LFN Traditional Knowledge Kaska regarding wildlife will be contracted to participate in ongoing surveys of the wildlife monitoring programs. RRDC/LFN involvement will ensure their understanding of the effects of the mine on wildlife, especially culturally important species, and to ensure consideration and/or integration of RRDC/LFN Kaska TK into the monitoring program. RRDC/LFN Land Stewards and/or Traditional Knowledge Team will review their contributions to the programs as part of the annual report before it goes to regulators. More detailed information is presented in Section 13.6 of the Project Proposal and in the Wildlife Protection Plan (Appendix R2-J of Response Report #2) (BMC, 2017c).	See Sections 1.5 and 1.6 and Chapters 7 and 8 of the WPP
Decision Document Monitoring Condition E	That a survey program be designed and instituted by the Proponent to monitor moose during late winter from construction through closure stages of the Project. This survey program shall be designed through collaboration with affected First Nations.	See Sections 1.5.3.1 and 7.1 and Appendix E (Protocol – Moose Effects Monitoring Survey Program) of the WPP
Decision Document Term #10(a)	Within six months of issuance of a Decision Document the Government of Yukon (YG) shall establish an independent KZKFCH Oversight Committee (FCHOC) comprised of participants representing the YG, Liard First Nation (LFN), and Ross River Dena Council (RRDC).	See Section 1.5.3.2 of the WPP
Decision Document Term #10(b)	Establishment of the FCHOC will include the development of a Terms of Reference that describes: i. Establishment of roles, responsibilities, and participants. The role of the Proponent as a member of the FCHOC. ii. Participant funding (RRDC and LFN). iii. Process for review of information (western scientific and traditional knowledge). iv. Process for decision-making and reporting. v. A mechanism for conflict resolution. vi. Other matters as agreed to by the parties. vii. Communication protocols between the FCHOC (chaired by YG), the Regulators, and the Proponent.	See Section 1.5.3.2 of the WPP
Decision Document Term #10(c)	Review throughout the life of the Project: 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: (i). Annually:	See Section 1.5.3.2 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
	1. When and how to apply the Proponent's mitigation measures pertaining to caribou referred to in Appendix A (Proponent commitments). 2. The prioritization of methods for reducing sensory disturbance. 3. The establishment of objectives, methods and prioritization for effectiveness monitoring. 4. The identification of triggers and corrective actions within the adaptive management plan. 5. The identification of additional mitigations such as offset measures that may be necessary to reduce adverse effects based traditional knowledge or new information from project specific or range-wide monitoring. 6. Educational and outreach activities regarding caribou in relation to the Project. (i) On a seasonal or shorter duration basis: 1. The implementation of timing windows for temporary suspensions of blasting and crushing. 2. The implementation of timing windows for temporary suspensions of truck transportation. 3. The limiting of speeds on the access road. 4. Restrictions on flights based on timing windows. 5. Modification of flight paths. 6. Suspension of helicopter use. 7. The use of convoys for transportation. 8. The intervals between and location of breaks in snow berms on the access road.	See Sections 1.5.3.2, 3.3, 5.2, 5.3, 6.1 and Chapter 4 of the WPP See Section 1.5.3.2 and Chapters 4, 5, 6, 7, and 8 of the WPP
Decision Document Term #10(d)	The FCHOC will review the initial Quartz Mine Licence (QML) application and any subsequent amendments to the Wildlife Protection Plan (inclusive of the Caribou Effects Monitoring and Mitigation Program), AMP and any other applicable plans. The FCHOC will be provided all available information to support their reviews, including the results of data collection and monitoring on the FCH.	See Section 1.5.3.2 and Chapters 4, 5, 6, 7, and 8 of the WPP
Decision Document Term #10(e)	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. Any other outputs of the FCHOC related to the status of the FCH across its range shall be provided to the appropriate YG officials. Upon decision, the YG regulator(s) shall submit to the FCHOC an explanation of how the Committee's recommendations were taken into consideration.	See Section 1.5.3.2 and Chapters 4, 5, 6, 7, and 8 of the WPP
Decision Document Term #11 (a)	The Government of Yukon (YG), in collaboration with affected First Nations, shall prepare a desktop review report of the FCH (FCH), based on all available western scientific and traditional knowledge. The results of the desktop review will inform the following: i. The need for and collection of additional data and project effects monitoring information, and identification of offset measures as required for unmitigated effects. ii. Range wide herd population dynamics, distribution, health, and habitat surveys. iii. Examination of cumulative effects and risks to the herd based on existing land use information. The results of the desktop review will be made available to the FCHOC. The FCHOC will review and provide recommended actions, as appropriate, such as offsetting measures, to the YG regulator(s) for any additional mitigations or monitoring.	See Section 1.5.3.3 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
Decision Document Term #11 (b)	The Proponent shall undertake additional data collection (habitat, distribution and movement) for a period of 2 years prior to initiation of construction, to inform the development and approval of a Caribou Effects Monitoring and Mitigation Program (Term No. 38[1]), AMP and the WPP. The design and methodology for this data collection will be developed in cooperation with Kaska and YG. The data collection shall commence once YG approves the Proponent's study design and methodology, following the issuance of this Decision Document.	See Section 1.5.3.4 of the WPP
Decision Document Term #11 (C)	YG will undertake additional range wide data collection and monitoring based on the results of the desktop review. The results of this monitoring will be shared with the FCHOC.	See Section 1.5.3.5 of the WPP
Decision Document Term #11 (d)	YG, in collaboration with affected First Nations, will develop a management plan for the FCH. The parties will determine management goals and objectives through a collaborative process. The FCH management plan will consider the following topic areas upon further discussion with affected First Nations: - Management principles and goal - Current conditions - Limiting factors - Future conditions - Habitat restoration and rehabilitation measures, and other offsetting measures where required - Management objectives and thresholds - Management tools and actions - Implementation - Monitoring - Adaptive management and review - Communication	See Section 1.5.3.6 of the WPP
Decision Document Term #12	The Proponent shall ensure that LFN and RRDC have opportunities to participate in and influence the development of environmental and socioeconomic management plans and closure objectives developed for the Project to ensure that Kaska can collaboratively design, collect, report, manage and communicate the results of the monitoring programs and adaptive management plans to their community members. The Proponent will make participant funding available to Kaska to support the incorporation of Kaska perspectives on Kaska laws as well as support the inclusion of Kaska members, including Elders and land stewards, in the regulatory process, the monitoring of impacts, the implementation of adaptive management and the Proponent's commitments for the life of the Project (regulatory to reclamation).	Section 1.5.1 of the WPP
Decision Document Term #13	The Proponent shall ensure that LFN has the opportunity to be part of the Proponent-Kaska environmental, cultural and heritage management program.	Section 1.5.1 of the WPP
Decision Document Term #38	The Proponent shall develop a Caribou Effects Monitoring and Mitigation Program, as part of the wildlife protection plan for review and approval under the quartz mining license (QML). The Proponent will provide the proposed program for review to the Finlayson Caribou Herd Oversight Committee (FCHOC). As described in Mitigation No. 10, the FCHOC will review and provide input on the effects monitoring program that will be incorporated into the approval of the program during the QML review.	See Section 1.5.3.7 and Chapters 4, 5, 6, 7, and 8 of the WPP

Reference No.	Proponent Commitment / Mitigation	Where addressed
	The Caribou Effects Monitoring and Mitigation Program shall be designed in consideration of the following objectives: 1. Evaluating effectiveness of the Proponent's caribou mitigations/Wildlife Protection Plan. 2. Evaluating effects of the Project on disturbance and displacement of the FCH. 3. Consideration of effects at various stages of the Project, including during pre- construction, construction, operations, and closure phase.	
Decision Document Term #41	The Proponent shall undertake the identification of offsetting measures and develop a plan, with the objective to address residual adverse effects to the Finlayson Caribou Herd and their habitat in consideration of the Management Plan for the Northern Mountain Population of Woodland Caribou (<i>Rangifer tarandus caribou</i>) in Canada. The Proponent shall develop the plan in consultation with Kaska, including a schedule for implementation.	See Section 1.5.3.8 of the WPP
Decision Document Term #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.	See Section 1.5.3.9 of the WPP