

# REPORT

## Wildlife Protection Plan

### Coffee Gold Mine

**Submitted By:**

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October 30, 2024

## REVISION TRACKING LOG

<i>Revision Tracking Log</i>			
Version	Date	Section Updated	Description of Update
0	November 2023	-	First submission of the Wildlife Protection Plan
1	October 2024		Updated in response to QML IR1 and ongoing engagement with First Nations' and Yukon Governments.
2			

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## LIST OF ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
AANDC	Aboriginal Affairs and Northern Development Canada
AAH	Annual Allowable Harvest
BC	British Columbia
CDC	Conservation Data Centre
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
DRLUP	Dawson Regional Land Use Recommended Plan
EDI	Environmental Dynamics Inc.
EMR	Yukon Energy Mines & Resources
GPS	global positioning system
HLF	Heap Leach Facility
LSA	Local Study Area (as defined for baseline studies)
MOE	Ministry of Environment
MWLAP	Ministry of Water, Land and Air Protection
NAR	Northern Access Route
Newmont	Goldcorp Kaminak Ltd., a wholly owned subsidiary of Newmont Corporation
NMP	Northern Mountain Population (of Woodland Caribou)
Project	proposed Coffee Gold Mine
QA/QC	Quality Assurance/Quality Control
QML	Quartz Mining License
ROW	Right of Way
RSA	Regional Study Area (as defined for baseline studies)
RSC	Revised Statutes of Canada
RSY	Revised Statutes of the Yukon
SARA	<i>Species at Risk Act</i>
SC	Statutes of Canada
TBD	to be determined
TH	Tr'ondëk Hwëch'in
TK	Traditional Knowledge
VC	Valued Component
VECC	Valued Ecological or Cultural Component
WRSF	Waste Rock Storage Facility
YESAB	Yukon Environment and Socio-economic Assessment Board

## LIST OF SYMBOLS AND UNITS OF MEASURE

Symbol / Unit of Measure	Definition
cm	centimetres
dbh	diameter at breast height
km	kilometre
km/hr	kilometres per hour
m	metre
Mm	millimetres
Mt/a	million tonnes per annum

## INFORMATION REQUIREMENTS FOR QUARTZ MINE LICENSE AND WATER LICENSE

Information Requirement	Location in this Plan
Table of Concordance	Appendix A
Revision Tracking Log	page i

## 1.0 INTRODUCTION

### 1.1 Project Summary

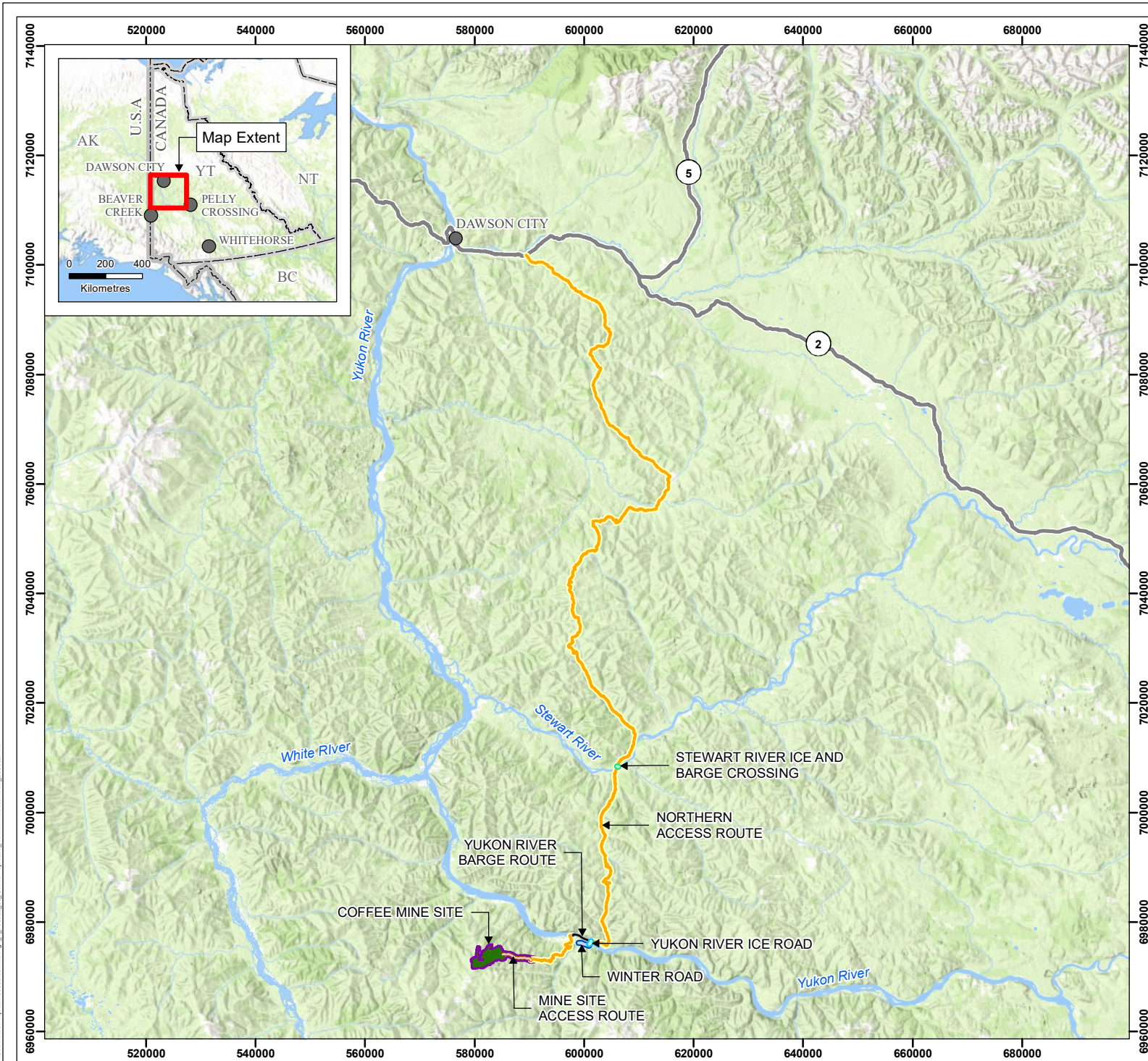
The proposed Coffee Gold Mine (the Project) is an open-pit gold mine owned by Goldcorp Kaminak Ltd., a wholly owned subsidiary of Newmont Corporation (Newmont), located on the south side of the Yukon River in the White Gold District of west-central Yukon. The Project site is approximately 130 km south of the City of Dawson, 140 km west of Pelly Crossing, 95 km north-east of Beaver Creek, and 340 km northwest of Whitehorse. The Project is located wholly within the traditional territory of Tr'ondëk Hwëch'in, partially within the traditional territory of Selkirk First Nation and First Nation of Na-cho Nyäk Dun, and partially within the asserted territory of White River First Nation. The Project contains several gold occurrences within an exploration concession covering an area of more than 600 km<sup>2</sup>. The Mine Site will be accessed by road from Dawson via a 16-km stretch of Klondike Highway and 192-km all-season road, referred to as the Northern Access Route (NAR) (Figure 1-1). The NAR includes seasonal barge crossings on both the Stewart and Yukon rivers, with ice bridges and a seasonal winter road in the winter months.

The Project is comprised of four open pits: Supremo, Latte, Double Double, and Kona. Waste rock is proposed to be permanently stored in the Alpha Waste Rock Storage Facility (WRSF) (Figure 1-2). The ore production rate is proposed to be up to approximately 9.0 million tonnes (Mt) per year, producing an estimated total of 67 Mt of heap leach feed over the 10-year Operation Phase. The conceptual-level estimate for waste material to be moved over the life of mine (LOM) is up to approximately 330 Mt based on an average strip ratio of 5.0:1. The ore will be crushed and transported to the Heap Leach Facility (HLF) via overland conveyor or trucks for nine months of the year. During the three coldest months of winter, run-of-mine (ROM) ore will be stockpiled in the ROM stockpile. Gold will be extracted from gold-bearing leach solution by a six tonnes per day (t/d) adsorption, desorption, recovery carbon plant with mercury retorting to produce a final gold doré product. A total of 2.6 million ounces of gold is planned to be recovered over a 10-year mine life.

The Project phases are defined as follows:

- Construction Phase: Q2 Year –3 to end of Year –1 (30 months)
- Operation Phase: Year –1 to end of Year 9 (10 years)
- Reclamation and Closure Phase: Year 10 to end of Year 21, including a 6-year Post-Mining Closure Stage and a 5-year Active Closure Stage (11 years)
- Post-Closure Phase: Year 21 onwards as determined to be required.

These phases broadly describe the activities occurring within a particular time period; however, some activities will continue from one phase to another as mine site development advances with operational activities (e.g., Open Pits, WRSF). When areas that support mine operations are no longer required, they will be progressively reclaimed. The overall Project schedule is the general expected scenario for mine construction and operation; detailed activities are subject to change depending on detailed mine planning and the timing of receipt of authorizations.



COFFEE GOLD MINE

Coffee Project Location and Northern Access Route

**Legend**

- Stewart River Ice and Barge Crossing
- Yukon River Barge Route
- Yukon River Ice Road
- Winter Road
- Mine Site Access Route
- Northern Access Route
- Project Area
- Project Footprint
- Highway
- Waterbody

- Notes**
1. This map is not intended to be a "stand-alone" document, but a visual aid of the information contained within the referenced Report. It is intended to be used in conjunction with the scope of services and limitations described therein.
  2. Contains information licensed under the Open Government Licence - Yukon Territory
  3. Basemap: ESRI World Topographic Map
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# COFFEE GOLD MINE

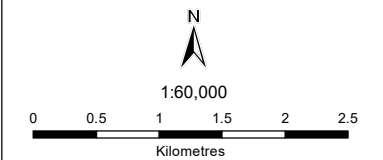
## General Arrangement - Mine Site

### Legend

- Double Double Pit
- Kona Pit
- Latte Pit
- Supremo Pit

### Notes

1. This map is not intended to be a "stand-alone" document, but a visual aid of the information contained within the referenced Report. It is intended to be used in conjunction with the scope of services and limitations described therein.
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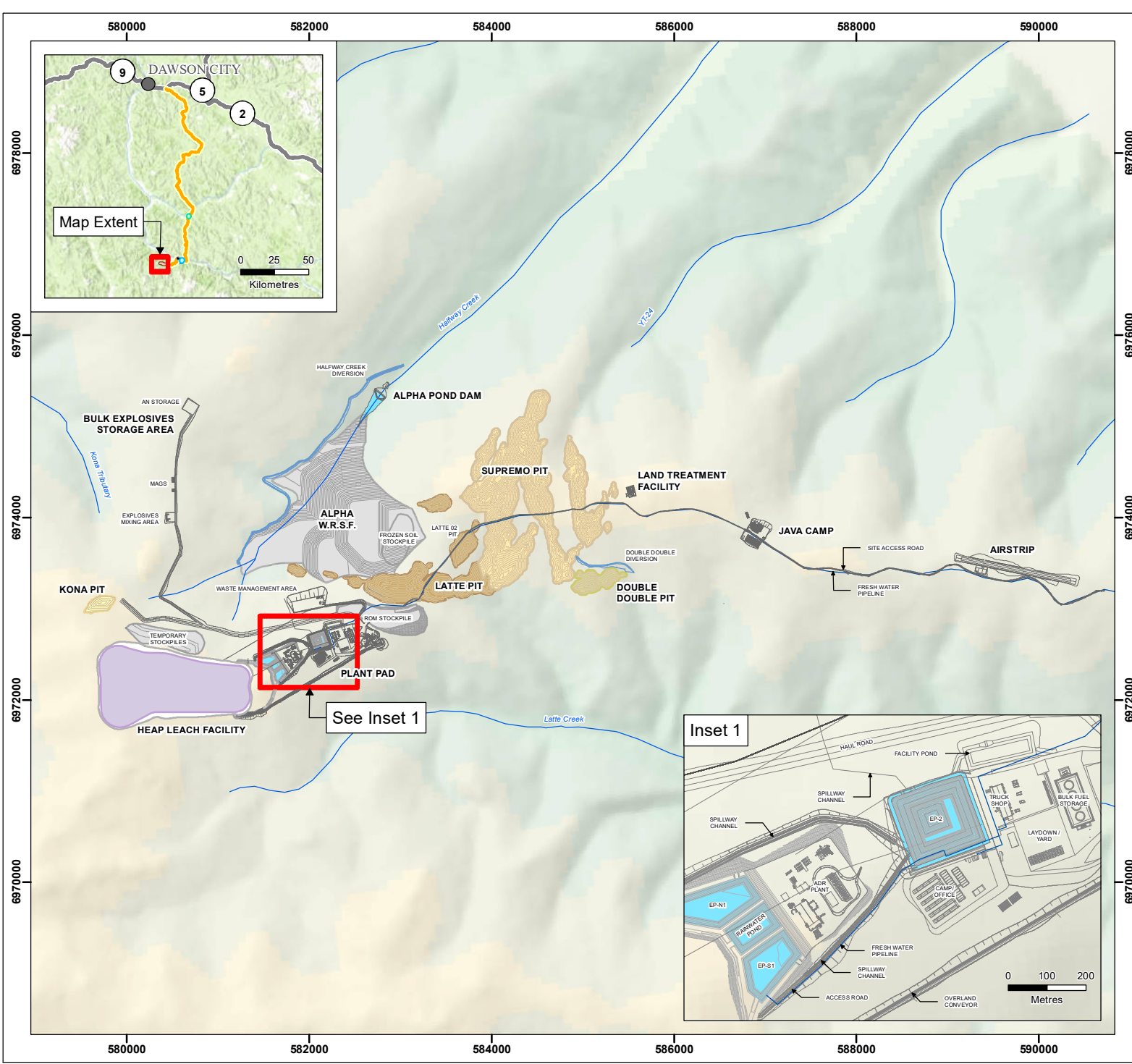
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## 1.2 Scope and Objectives

Construction, operation, and closure of the Project have the potential to negatively impact the environment, including effects to wildlife populations within the Project area. The Project may affect wildlife through several pathways; these include the loss of wildlife habitat associated with the clearing of the Project footprint, additional loss of habitat in the surrounding areas as a result of wildlife avoidance due to sensory disturbances from Project activities, effects on wildlife movement through the Project area, increased mortality due to collisions with Project equipment and infrastructure, increased mortality due to increased hunter access to the area or increased predator abundance, and increased mortality or effects to wildlife health resulting from contamination of the surrounding environment (e.g. through dust deposition or other project emissions). This Wildlife Protection Plan (the Plan) is intended to identify and demonstrate how appropriate management techniques will reduce the potential for any adverse effects to wildlife and describes the measures that will be implemented to mitigate any adverse effects resulting from Project activities. This Plan has been written to meet the guidance provided in the *Plan Requirement Guidance for Quartz Mining Projects* (YWB and EMR 2013).

Commitments that were made during the YESAB screening process related to the Wildlife Protection Plan as well as mitigations and monitoring requirements set out by the Decision Document terms are incorporated into the plan where possible and are summarized in the Wildlife Protection Plan Table of Concordance (Appendix A).

This Plan is provided in conjunction with several other plans to meet the requirements for quartz mine applications for a Quartz Mining License and a Water Use Licence under the *Quartz Mining Act* and the *Waters Act*, respectively. Other applicable regulations related to wildlife management and monitoring are detailed in Section 2.0.

## 1.3 Incorporation of Traditional Knowledge and Consultation Feedback

Consultation during preparation of the Project Proposal (2017-0211) identified wildlife as a valued component that should have a range of mitigation measures implemented to minimize change (Goldcorp 2017). Specific concerns included potential for increased hunting pressure, increased wildlife mortality related to mine traffic, management of pit lakes, management of mine infrastructure as movement barriers, effects of cyanide, aircrafts, and dust on wildlife, calcium chloride as a wildlife attractant, NAR concerns, interaction of wildlife with Mine Site and NAR, and phased responses for certain wildlife mitigations.

First Nation engagement and consultation is ongoing, and any feedback that is received or concerns that are heard during consultation will be incorporated into this plan, where applicable.

## 1.4 Synergies with Newmont Standards and Requirements and Other Project Documents

As an important part of Newmont's internal governance process, Newmont has implemented Global Policies and Standards (Global Standards) that are reviewed and preliminarily approved by a Global Policies & Standards Committee. The Global Standards provides the framework and standards for Newmont sustainability management and ensures a consistency of approach for implementing these global policies across the Company.

The Global Standards apply to all directors, officers and employees of Newmont Corporation, its subsidiaries, and any other entities that it controls. A variance request process for existing or future conditions is in place. The process provides an alternative mechanism for those instances where a Newmont site/operation cannot logistically or feasibly conform to a requirement established in a Standard due to special conditions or unique hardships. The Global Standards are intended to be fully integrated into all core business functions, and they emphasize sustainability, responsibility, and accountability at all organizational levels.

The list of Global Standards is provided in Table 1-1.

**Table 1-1 Newmont Global Standards**

Global Standards	
Air Emissions Management Standard	Land Acquisition and Involuntary Resettlement Standard
Biodiversity Management Standard	Local Procurement and Employment Standard
Closure and Reclamation Management Standard	People Policy
Code of Conduct	Product Stewardship Standard
Community Investment and Development Standard	Social Baseline and Impact Assessment Standard
Cultural Resource and Management Standard	Stakeholder Relationship Management Standard
Drug and Alcohol Policy (Coffee-Specific)	Tailings Storage Facility and Heap Leach Facility Environmental Standard
Hazardous Materials Management Standard	Tailings Storage Facilities Technical and Operations Standard
Health and Safety Policy	Waste Management Standard
Human Resources Standard	Waste Rock and Ore Stockpile Management Standard
Human Rights Standard	Water Management Standard
Indigenous Peoples Standard	

While this Plan can be reviewed in isolation to assess specific actions for wildlife protection, it should be viewed in concert with the following additional management plans for a holistic understanding of the Project:

- Access Route Construction Management Plan
- Access Route Operational Management Plan
- Reclamation and Closure Plan
- Explosives Management Plan
- Emergency Response Plan
- Spill Contingency Plan
- Vegetation Protection Plan
- Vegetation Monitoring Plan
- Water Management Plan
- Wildlife Monitoring Plan.

## 1.5 Roles and Responsibilities of Key Personnel

Newmont has committed to providing the necessary human, material, and financial resources to implement and maintain the Plan. The Environment Department will be responsible for implementation of the monitoring components outlined in the Plan. Key Project personnel responsible for being familiar with the contents of this Plan are shown in Table 1-2.

**Table 1-2 Key Project Personnel**

Role	Responsibility
Mine General Manager	Overall responsibility for Mine Site management.
Operations Manager	Responsible for mine planning and production, mine technical monitoring, and mine regulatory compliance.
H&S Manager	Responsible for conducting regular safety site inspections and implementing the appropriate controls in a timely manner. The H&S Manager shall maintain records of all safety inspections as well as any actions taken because of these inspections throughout the life of the Project. Where safety inspections show the potential for environmental effects, the H&S Manager will work in collaboration with the Environment Department.
Sustainability and External Relations (SER) Department	Responsible for recording and addressing any complaints received from nearby land users, or other interested parties regarding wildlife-related impacts off-site. The SER department shall maintain records of all complaints received as well as any actions taken because of these complaints.
Environmental Manager	Responsible for permitting, environmental monitoring, and regulatory compliance, and the implementation on this plan.

## 2.0 REGULATORY AND MANAGEMENT CONTEXT

The following legislation and regulations are relevant to the management and conservation of wildlife in the Project area. This section is provided as a general overview of relevant legislation and regional plans.

### 2.1 Federal Government

#### 2.1.1 *Canada Wildlife Act*

The *Canada Wildlife Act*, RSC 1985, c. W-9, allows for the creation, management, and protection of wildlife areas to preserve habitats, and to permit wildlife research and interpretive activities. There are no such protected areas in the Project area.

#### 2.1.2 *Migratory Birds Convention Act*

The *Migratory Birds Convention Act 1994*, SC 1994, c. 22, and its regulations provide protection for migratory birds (i.e., most species of birds in Canada) and their nests and regulate the hunting of migratory game birds. The *Act* and its regulations prohibit the incidental take of migratory birds, their eggs, or active nests.

#### 2.1.3 *Species at Risk Act*

The *Species at Risk Act*, SC 2002, c. 29 (*SARA*), provides for the recovery of wildlife species that are extirpated, endangered, or threatened because of human activity, and manages species of special concern to prevent them from becoming endangered or threatened. Within the *Act*, the Committee on the Status of Endangered Wildlife in Canada (*COSEWIC*), an independent body of experts, is responsible for assessing wildlife species to determine whether they may qualify for legal protection and recovery under *SARA*. Once listed under *SARA*, species plans are legal requirements to secure the necessary actions for species recovery and management. Baseline surveys for the Project have documented several species listed under *SARA* or *COSEWIC* within the Project area (Section 3.0). The only species at risk in the Project area with an existing management plan is the Northern Mountain population of caribou (i.e., the Klaza Caribou herd) (Section 2.4.2).

#### 2.1.4 *Yukon Act*

The *Yukon Act*, SC 2002, c. 7, gives authority to the Yukon Legislature to make laws in relation to the conservation of wildlife and its habitat within the Yukon, other than in a federal conservation area. This *Act* prohibits the Yukon government from making laws that limit subsistence hunting by Aboriginal people on lands where Final Agreements are not in effect. Where Final Agreements are in effect, such as the Project area, the Yukon government has the legislative authority to regulate all hunting and must conform to the provisions of First Nation Final Agreements when addressing subsistence harvesting.

#### 2.1.5 *Yukon Environmental and Socio-economic Assessment Act*

The *Yukon Environmental and Socio-economic Assessment Act*, SC 2003, C.7 gives authority and rules to the Yukon Environmental and Socio-economic Assessment Board (*YESAB*) to administer the assessment process that applies to all lands within the Yukon. *YESAB* information requirements and evaluation process guidelines include statements on documenting abundance and distribution characteristics of major wildlife species within the Project area and vicinity, including key habitat features. Also listed in these guidelines is

the inclusion of all proposed environmental protection, contingency, and monitoring plans including wildlife protection and monitoring.

## **2.2 Territorial Government**

### **2.2.1 Environment Act**

The Yukon's *Environment Act*, RSY 2002, c.50, and regulations provide protection of land, water, and air. It applies on lands throughout the Yukon, including private property, Crown lands, lands within municipal boundaries, and First Nation settlement lands where the First Nation has not developed equivalent laws. This *Act* is primarily used for regulations related to air quality, waste, recycling, spills, and contaminated sites, and not wildlife. In addition, the *Act* provides for natural resource planning and management, including identifying conservation easements for conserving and enhancing wildlife habitats. There are currently no regulations for the protection of wildlife and habitats under this *Act*.

### **2.2.2 Wildlife Act**

The Yukon *Wildlife Act*, RSY 2002, c.229, provides rules for hunting and trapping, outfitting, and guiding, licensing, enforcement, and habitat protection. It also gives authority to make regulations including prescribing specially protected wildlife and protected areas. Harvest management in the region is ultimately the responsibility of the Yukon Government under the *Wildlife Act*. Peregrine Falcon (*Falco peregrinus*) and Gyrfalcon (*Falco rusticolus*), both of which could be found in the Project area, are protected under the Yukon *Wildlife Act*. The Project area does not overlap any Habitat Protection Areas administered under this *Act*.

### **2.2.3 Yukon Conservation Data Centre**

The Yukon Conservation Data Centre (CDC) was established to provide information on species and ecosystems at risk. The CDC maintains a list of all animals known to occur in Yukon with their corresponding conservation ranks at the global, national, and territorial levels. The CDC has two types of lists: Track List and Watch List. The Track List is a list of all species of conservation concern with conservation status ranks. The Watch List is a list of species for which there is not enough information to determine whether they are of conservation concern.

## **2.3 First Nation Governments**

The Project (including the NAR) is located on Crown Land and is situated in the overlapping established traditional territories of Tr'ondëk Hwëch'in (TH), Selkirk First Nation (SFN), and First Nation of Na-cho Nyäk Dun (FNNND) and the asserted traditional territory of the White River First Nation (WRFN). Tr'ondëk Hwëch'in, Selkirk First Nation and the First Nation of Na-cho Nyäk Dun are self-governing and have land management rights on settlement lands and land-use rights within the Project area as defined in their Final Agreements and the Umbrella Final Agreement; White River First Nation has not yet established legislation for the management and administration of settlement lands and wildlife.

## **2.4 Dawson Regional Land Use Recommended Plan (Draft)**

In 2022, the Dawson Regional Planning Commission released the Draft Dawson Regional Land Use Recommended Plan (DRLUP), which contains objectives and management intent statements for land

management in the Dawson region. The draft DRLUP outlines objectives and recommended management practices for focal species including caribou, moose, grizzly bears, black bears, sheep, migratory birds and raptors.

## 2.5 Management Plans or Recovery Plans

### 2.5.1 Fortymile Caribou Herd Management Plan

The Fortymile Caribou Herd Management Plan was developed in 1995 through collaboration between the Alaska and Yukon governments, the Tr'ondëk Hwëch'in, Alaska Native organizations, and various environmental, hunting, and other interest groups. This recovery plan focused on promoting herd growth to facilitate the reoccupation of historic range in both Alaska and the Yukon through the management of habitat, harvest and predation, as well as increased public involvement and awareness. The Plan was developed for a five-year period from 1996 to 2001.

Since 2001, there has not been a comprehensive management plan for the Fortymile caribou; however, harvest management plans for the herd are developed for both Alaska and the Yukon:

- (Alaska) Fortymile Caribou Herd Harvest Plan: 2019–2023 (Harvest Management Coalition 2019)
- (Yukon) Fortymile Caribou Herd Harvest Management Plan: November 2020 (Fortymile Harvest Management Committee 2020)

Under the current harvest plans, Yukon hunters are allocated 35% of the annual allowable harvest (AAH) which varies according to herd size. The Yukon allocation is currently shared between the Tr'ondëk Hwëch'in and licensed hunters (if/when the herd expands into other Traditional Territories, those respective First Nations will be allotted a portion of the Yukon allocation). Licensed hunting in the Yukon is restricted to the summer (August 1–September 9) and late winter (December 1–March 31) seasons (Fortymile Harvest Management Committee 2020). Management Plan for the Northern Mountain Population of Woodland Caribou (*Rangifer tarandus caribou*) in Canada

The Northern Mountain Population (NMP) of Woodland Caribou, which includes the Klaza caribou herd, was assessed by COSEWIC in 2002 and listed under *SARA* as a species of “Special Concern” in 2005. In 2012, Environment Canada released a management plan for the NMP. The goal of the management plan is to prevent the NMP from becoming threatened or endangered by engaging responsible agencies to carefully manage the NMP and their habitat (Environment Canada 2012). The management plan is focused on achieving the following goals that are re-evaluated on a five-year basis:

- Herds of the NMP are maintained or recovered, and populations operate within the natural range of variability
- The ecological integrity of key habitats and ecosystems required by the NMP are maintained
- First Nations, local communities, government agencies, and other interested parties are meaningfully involved in the stewardship of the NMP and its habitats.

To meet these goals, the Plan includes a series of management objectives for monitoring herd status and trends over time, including:

- Managing harvest for sustainable use

- Assessing health risks and maintaining caribou health
- Increasing understanding of predator-prey dynamics and potential competition with other herbivores
- Identifying, assessing, managing, and conserving important habitats
- Promoting conservation of the NMP through environmental and cumulative effects assessments
- Fostering opportunities to share knowledge and information and develop education and stewardship programs (Environment Canada 2012).

### **2.5.2 Other Relevant Guidelines/Best Management Practices**

- *Environmental Code of Practice for Metal Mines (Environment Canada 2009)*
- *Flying in Caribou Country: How to Minimize Disturbance from Aircraft (Environment Yukon 2010)*
- *Flying in Sheep Country: How to Minimize Disturbance from Aircraft (Environment Yukon 2006)*
- *Guidelines for Industrial Activity in Bear Country: For the Mineral Exploration, Placer Mining and Oil & Gas Industries (Environment Yukon 2008)*
- *Proponent's Guide: Assessing and Mitigating the Risk of Human-Bear Encounters (Yukon Government 2012).*

### 3.0 WILDLIFE RESOURCES

Wildlife, including both mammals and birds, are an important part of the local environment. Wildlife are valued based on their role as a part of healthy ecosystems, because of their value to First Nations and other local people who may rely on certain species as a subsistence and economic resource, and for their intrinsic value as a symbol of wilderness. Additionally, some species have been identified as at-risk and must be assessed where potential Project-related effects can occur (SARA, subsection 79). The information below summarizes information on wildlife found within the Project area.

Baseline surveys for mammals and birds were conducted within the Project area from 2013 through 2016 in support of the Coffee Gold Mine Project Proposal submission to YESAB — for more information on baseline conditions refer to the Wildlife Baseline Report (EDI 2017a) and the Bird Baseline Report (EDI 2017b). Following the Project submission to YESAB, baseline data collection continued for several focal species/species groups; the results of these studies are presented in annual reports (EDI 2018, EDI 2019, EDI 2020, EDI 2021, EDI 2022).

#### 3.1 Mammals

Baseline information for mammals within the Project area was collected through a variety of studies, including aerial surveys for ungulates, bear den surveys, sheep surveys, snow tracking surveys, remote camera studies, ground-based investigations of wildlife trails and habitat features, pellet removal plots, and targeted surveys for collared pika (*Ochotona collaris*), bats, and small mammals. Baseline surveys were conducted at several spatial scales depending on the species being studied; however, discussion of baseline results generally focused on two spatial scales:

- The Wildlife Local Study Area (LSA) was delineated based on height of land and a minimum buffer of 1 km around the Mine Site footprint, as well as a 1-km buffer on either side of the proposed NAR.
- The Wildlife Regional Study Area (RSA) was designed to include any game management subzone that intersects or is near to the Project footprint (Figure 3-1).

The Project is located within the current range of two caribou herds: the Klaza and the Fortymile. The Klaza caribou herd is a resident herd of woodland caribou in the Dawson Range mountains estimated at 1,179 caribou (Hegel 2013). The Mine Site is within the defined annual range of the Klaza caribou herd; however, it is located outside of the herd's late-winter range (Hegel and O'Donoghue 2015). Wildlife observations made by Project staff and contractors since 2010 have documented Klaza caribou within the southern sections of the RSA during the spring, summer, and fall seasons. For most of the year, the Klaza caribou tend to be found in alpine and subalpine habitats above the treeline, although they will use lower-elevation habitats during the winter.

The Fortymile caribou herd is a migratory herd that historically ranged over large parts of both Alaska and the Yukon. Following a population decline in the 1970s, the herd abandoned nearly all its range in the Yukon. Following recovery efforts in the 1990s, the herd began returning to the Yukon in 2002, but until 2013 the Fortymile caribou herd range remained largely limited to habitats west of Dawson (Kienzler and Sutor 2015). In the fall of 2013, the herd expanded its current range in the Yukon further east, re-inhabiting portions of its former Yukon range including parts of the RSA. The herd peaked in size in 2018 with an

estimated 84,000 caribou (Fortymile Harvest Management Committee, 2020); however, since then, it has experienced a notable decline, and the most recent population estimate in July 2022 estimated the herd at approximately 38,000 caribou (Alaska Department of Fish and Game, 2023). During the period from 2013–2018, when the herd was increasing in size, large numbers of caribou were observed in the RSA during two winters: 2013/2014 and 2015/2016. Since the herd size began to decline in 2018, the Fortymile caribou herd has not overlapped the RSA in significant numbers (although occasional small groups of caribou have been documented). Based on the observed use of the RSA since 2013, Fortymile caribou presence in the Project area is expected to vary significantly between years — in many years (particularly while the herd size is low), the herd is expected to be absent from the RSA or present seasonally in only very low numbers; however, in other years, large numbers of caribou may be present during the fall and winter months (large numbers of caribou within the RSA are expected to be more likely if/when the herd begins to increase in size again).

Other ungulates in the Project area include moose (*Alces alces*), mule deer (*Odocoileus hemionus*) and thinhorn sheep (*Ovis dalli dalli*). Moose are widespread in the region year-round and are heavily harvested in parts of the Wildlife RSA. During the post-rut/early winter season, moose congregate in subalpine shrub communities within the RSA; several key areas for post-rut/early winter congregations are known in the RSA including areas along the NAR. In the late winter, moose are more restricted in their habitat use than in other seasons, although baseline studies found that the RSA contains abundant and widespread high quality late winter moose habitat. Additionally, in 2017, an active mineral lick frequented by moose was identified in the LSA along the NAR, between the Stewart and Yukon rivers. Mule deer are sparse in this part of the Yukon but are occasionally observed in the RSA, usually associated with open grassy slopes. Thinhorn sheep are known to occur in small numbers on the cliffs and rocky outcrops along the northern bank of the Yukon River.

Large predators found in the RSA include grizzly bear (*Ursus arctos*), black bear (*Ursus americanus*) and grey wolf (*Canis lupus*). Baseline studies suggested that while grizzly bears are present in relatively low densities, black bears are much more abundant within the RSA. Both species may den in the RSA and outside of the denning season may overlap with the Project footprint from April to October. Grey wolves are found throughout the Project area and baseline studies documented several wolf packs present within the RSA. Other furbearers that were documented in the RSA include wolverine (*Gulo gulo*), red fox (*Vulpes vulpes*), Canada lynx (*Lynx canadensis*), American marten (*Martes americana*), American mink (*Neovison vison*), North American beaver (*Castor canadensis*), least weasel (*Mustela nivalis*), and ermine (*Mustela erminea*), among others.

Several smaller mammals are present in the Project area including snowshoe hare (*Lepus americanus*), red squirrel (*Tamiasciurus hudsonicus*), northern flying squirrel (*Glaucomys sabrinus*) and various species of voles, mice, and shrews (*Sorex* sp.). Collared pika were observed within the Wildlife RSA during wildlife baseline studies but are not known within the Wildlife LSA — both the Mine Site and the NAR areas lack the talus slopes and other habitat requirements of collared pika. Given their absence from the LSA, this Plan does not include specific protection measures for pika. Little brown myotis (*Myotis lucifugus*) were documented within the Wildlife LSA but appear to be limited to the lower elevations along the NAR. Surveys for little brown myotis conducted in the Yukon have confirmed occurrence of this species up to 1,000 m elevation within its range (Slough and Jung 2008).

Of the mammal species potentially found within the Wildlife RSA, six are listed under SARA (by COSEWIC) or the Yukon *Wildlife Act* (Table 3-1).

**Table 3-1 Mammal Species at Risk Listed by the Committee on the Status of Endangered Wildlife in Canada, *Species at Risk Act*, and Yukon *Wildlife Act*.**

Common Name	Latin Name	SARA	COSEWIC	Yukon Wildlife Act	Confirmed in the Wildlife RSA
Woodland Caribou, Northern Mountain Population	<i>Rangifer tarandus caribou</i>	Special Concern (Schedule 1, 2005)	Special Concern (2014)	-	Yes
Grizzly Bear	<i>Ursus arctos</i>	Special Concern (Schedule 1, 2018)	Special Concern (2012)	-	Yes
Wolverine	<i>Gulo gulo</i>	Special Concern (Schedule 1, 2018)	Special Concern (2014)	-	Yes
Cougar	<i>Puma concolour</i>	Not at Risk	Not at Risk	Specially Protected	Unconfirmed <sup>1</sup>
Collared Pika	<i>Ochonona collaris</i>	Special Concern (Schedule 1, 2017)	Special Concern (2011)	-	Yes
Little Brown Myotis	<i>Myotis lucifugus</i>	Endangered (Schedule 1, 2014)	Endangered (2013)	-	Yes

<sup>1</sup>One unconfirmed cougar observation was recorded in the Wildlife Observation Log in 2019 (EDI 2020)

### 3.2 Birds

Baseline studies for birds and bird habitats within the Project area consisted of point count surveys for upland birds, cliff-nesting raptor surveys, Common Nighthawk (*Chordeiles minor*) and Short-eared Owl (*Asio flammeus*) stand-watch surveys, Sharp-tailed Grouse (*Tympanchus phasianellus*) lek surveys, and incidental observations (EDI 2017b). Baseline studies for birds were conducted at two different spatial scales depending on the species being studied:

- The Bird LSA was delineated based on height of land and a minimum buffer of 1-km around the Mine Site footprint, as well as a 1-km buffer on either side of proposed road alignments.
- The Bird RSA was defined based on the watershed drainages overlapping the Project footprint and a 10 km buffer around the various road alignment options through the Dawson Goldfields (Figure 3-1).

The Project area contains a wide variety of habitats ranging from dense lowland riparian forest to sparsely vegetated alpine areas, which provide breeding habitat for a variety of bird species including raptors, waterbirds, waterfowl, shorebirds, and upland birds. The diversity of birds within the Project area is generally representative of the avian community within the central Yukon; however, the lack of lakes and large waterbodies is reflected by the absence of species associated with those habitats. Additionally, alpine habitats are absent from the Project footprint and are limited within the Bird RSA, resulting in very few observations of alpine-obligate species. A total of 119 bird species have the potential to occur in the Project area, of which 88 have been documented to date, including nine species of conservation concern listed by COSEWIC or under SARA and two species listed under the Yukon *Wildlife Act* (Table 3-2). The Project

species list also includes 13 species which are on the Yukon Conservation Data Centre Track List and 14 species on the Watch List.

**Table 3-2 Summary of Bird Species at Risk that may occur within the Project Area**

Common Name	Latin Name	COSEWIC Status (Year)	SARA Status	Yukon <i>Wildlife Act</i>	Confirmed in the Bird RSA
Horned Grebe	<i>Podiceps auratus</i>	Special Concern (2009)	Not listed		Yes
Peregrine Falcon	<i>Falco peregrinus</i>	Not listed	Not listed	Protected	Yes
Gyrfalcon	<i>Falco rusti</i>	Not listed	Not listed	Protected	
Red-necked Phalarope	<i>Phalaropus lobatus</i>	Special Concern (2014)	Special Concern (2019)		
Lesser Yellowlegs	<i>Tringa flavipes</i>	Threatened (2020)	Not listed		Yes
Short-eared Owl	<i>Asio flammeus</i>	Threatened (2021)	Special Concern (2012)		Yes
Common Nighthawk	<i>Chordeiles minor</i>	Special Concern (2018)	Threatened (2010)		Yes
Olive-sided Flycatcher	<i>Contopus cooperi</i>	Special Concern (2018)	Threatened (2010)		Yes
Bank Swallow	<i>Riparia riparia</i>	Threatened (2013)	Threatened (2017)		Yes
Barn Swallow	<i>Hirundo rustica</i>	Special Concern (2021)	Threatened (2017)		
Rusty Blackbird	<i>Euphagus carolinus</i>	Special Concern (2017)	Special Concern (2009)		Yes

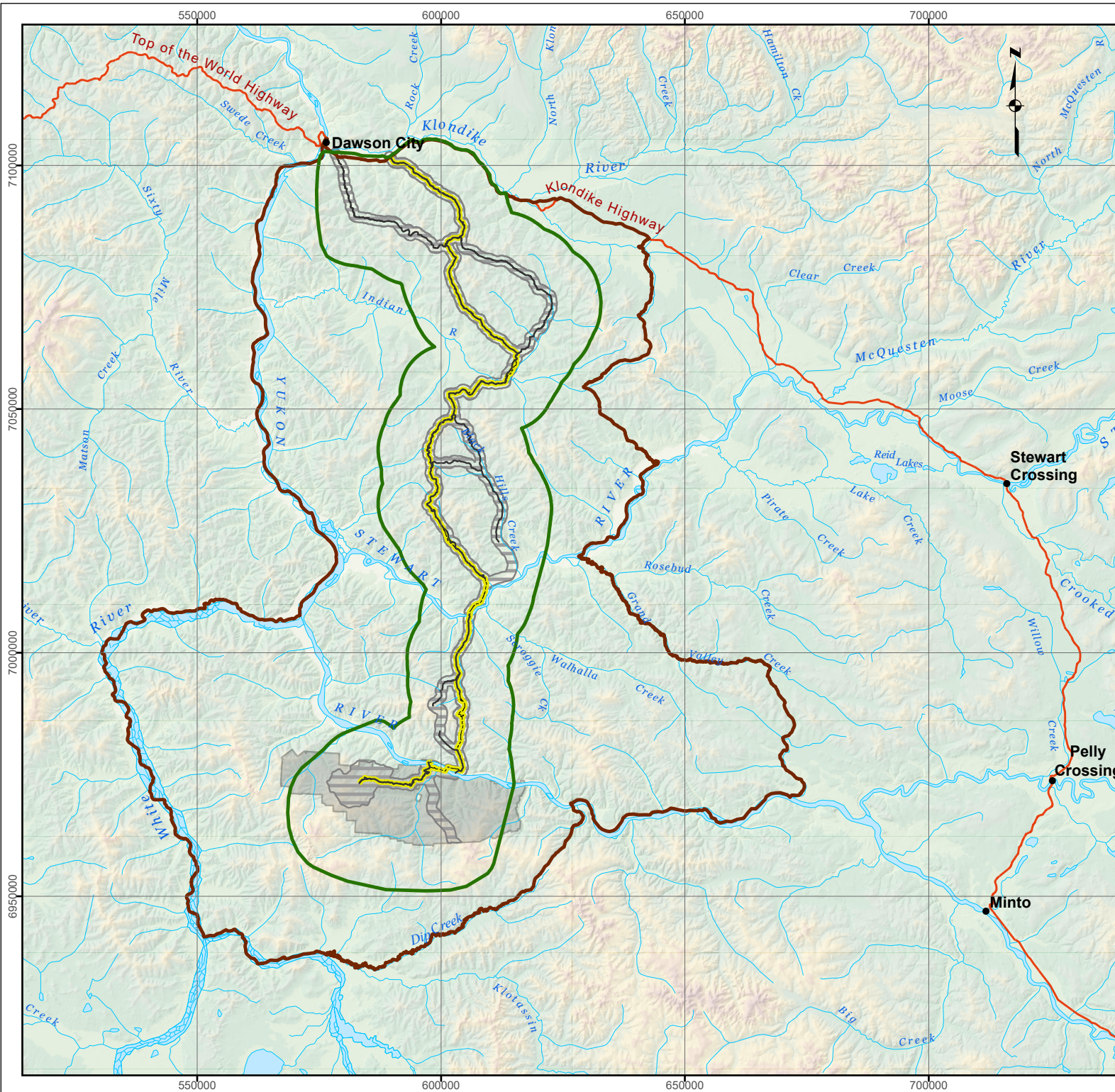
Important raptor habitats within the Bird RSA include the cliff faces along the Yukon and Stewart rivers and rock outcroppings (tors) in high-elevation areas that provide nesting sites for cliff-nesting raptors. Baseline surveys documented several active and inactive raptor nests along the Yukon and Stewart River cliffs (including active nests of Golden Eagles (*Aquila chrysaetos*), Peregrine Falcon and Common Ravens (*Corvus corax*)); however, no raptor nest sites were found in the Mine Site area. Raptor species at risk in the Project area include both Peregrine Falcon<sup>1</sup> and Short-eared Owl. Suitable nesting habitat for Short-eared Owls can be found in several parts of the Bird RSA; however, Short-eared Owl observations during baseline studies were limited to a single observation of a foraging adult. Additionally, Gyrfalcon, while considered a potential species within the Bird RSA, was not detected in Project area during baseline studies. Gyrfalcon is protected under the Yukon *Wildlife Act*, although not listed under SARA or COSEWIC.

Waterfowl (i.e., ducks, swans, and geese) and other waterbirds (e.g., loons, grebes, gulls) are relatively uncommon in the Bird RSA due to the lack of lakes and large wetlands. Shorebirds in the Project area occupy a variety of habitats including stream margins, wetlands, and alpine areas. Horned Grebes (*Podiceps auratus*), a species at risk, were confirmed nesting within the Bird RSA, but were only detected in the Dominion Creek area which is outside of the Project footprint. Lesser Yellowlegs (*Tringa flavipes*),

<sup>1</sup> Peregrine Falcon, previously included on Schedule 1 of SARA was delisted in 2023; however, the species remains protected under the Yukon *Wildlife Act*.

listed as a Threatened species by COSEWIC in 2020, were documented during Project baseline surveys in various lowland habitats (particularly wetland habitats) across the RSA.

Upland bird species within the Project area include game birds (grouse, ptarmigan), Common Nighthawks, Belted Kingfishers (*Ceryle alcyon*), and woodpeckers and passerines (songbirds). Passerine species include flycatchers, shrikes and vireos, jays and crows, larks, swallows, chickadees, kinglets, thrushes, waxwings, warblers, longspurs and sparrows, blackbirds, and finches. Upland bird species at risk detected in the Project Area include Common Nighthawk, Olive-sided Flycatcher, Bank Swallow, and Rusty Blackbird. Baseline studies documented Common Nighthawk along several sections of the NAR, with observations concentrated in areas with old burns or disturbance from placer mining. Olive-sided Flycatchers were found in several locations within the Bird RSA associated with old burns or coniferous forest habitats. Bank Swallows were observed in several areas along the NAR, with active nesting colonies located along riverbanks and embankments created from roads and placer mining activity. Rusty Blackbirds were documented in natural wetlands habitats and reclaimed placer mining ponds along the NAR. Additionally, although not listed under SARA or COSEWIC, Sharp-tailed Grouse were selected as a focal species for baseline studies and the Project effects assessment due to concerns about potential interactions with the NAR. Sharp-tailed Grouse surveys located several Sharp-tailed Grouse leks in the Project RSA; however, all documented leks were more than 3 km from the Project footprint.



**Legend**

- Highway
- Existing Access
- Proposed Route
- Bird Local Study Area
- Bird Regional Study Area
- Wildlife Regional Study Area
- Coffee Property

**FIGURE: 3-1**

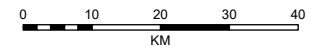
**Wildlife and Bird Study Areas for the Coffee Project**

Data Sources  
Topographic: Spatial Data courtesy of Her Majesty the Queen in Right of Canada, Department of Natural Resources. All Rights Reserved.

Digital Elevation Models (30 m and 90 m) provided by Geomatics Yukon - Yukon Government via online source (Corporate Spatial Warehouse) www.geomatics.yukon.ca.

Project data displayed is site specific. Survey data collected by EDI Environmental Dynamics Inc. (2015).

Disclaimer  
This document is not an official land survey and the spatial data presented is subject to change.



Map Reference Scale: 1:1,100,000 (Printed at 8.5 x 11)  
Coordinate System: NAD 1983 CSRS Yukon Albers

<small>Drawn: MP/HG/OL</small>	<small>Checked: AM/MAS/AA</small>	<small>Date: 2024-09-23</small>
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## 4.0 WILDLIFE PROTECTION MEASURES FRAMEWORK

To reduce or eliminate potential Project effects on wildlife and wildlife habitat, Newmont has committed to numerous mitigation measures. Some of the mitigation actions are expected to be modified through the life of the Project as part of an adaptive management approach. To inform Newmont, Project regulators, First Nations, and stakeholders about mitigation effectiveness and Project effects, the wildlife protection measures outlined in this Plan are supported by a Project effects monitoring framework described in the Wildlife Monitoring Plan. The wildlife monitoring program will be used to confirm compliance with mitigation practices, discern Project-related effects from natural variability, identify unanticipated Project-related effects so that mitigation actions can be implemented to reduce further harm, and provide information to support adaptive management of the Wildlife Protection Plan. For more information about Newmont's approach to adaptive management and thresholds and triggers for adaptive management, please refer to the Environmental Monitoring and Adaptive Management Plan and the Wildlife Monitoring Plan, respectively.

As referenced in Section 1.4 there are several other Project-specific management plans that will be implemented in conjunction with the Wildlife Protection Plan and will contribute to the protection of wildlife and wildlife habitats through the management of effects to vegetation, air quality, and surface water quality, noise and waste management, among others. Refer to the relevant management plans for specific mitigation measures relating to these areas. Note that the Wildlife Protection Plan identifies mitigation actions for both the Mine Site area and NAR during the Construction and Operation phases of the Project. Wildlife mitigation and monitoring programs for the Reclamation and Closure and Post-closure phases of the Project are included in the Reclamation and Closure Plan.

### 4.1 Project Design

The Project design considered several elements that will help to mitigate effects on wildlife as described below.

#### *Project Siting*

- To minimize habitat loss, the Project footprint at the Mine Site was designed to be as small as possible; examples of considerations made to minimize the footprint include the backfill of pits and waste rock storage facility design.
- The location of the Mine Site and associated infrastructure avoids many of the sensitive habitats (e.g., riparian areas, wetlands, mature or old-growth forests, steep south-facing slopes) within the region; in particular:
  - The location of the new airstrip on the subalpine ridge near the mine, as opposed to the location of the exploration airstrip in the Yukon River valley, minimizes disturbance to high-value wildlife habitats in the Yukon River valley and to the cliff-nesting raptor and sheep habitat on the north side of the Yukon River valley.
- To minimize disturbance to wildlife and wildlife habitats, where Project design allows, Project infrastructure and laydown areas will be constructed outside of identified environmentally sensitive areas (e.g., wetlands, riparian areas, key habitat for focal species) and will avoid important wildlife habitat features.

### ***Progressive Reclamation***

- Phased mine development and progressive reclamation of disturbed areas, where practicable, will limit the duration of Project effects. Progressive reclamation of Project infrastructure areas will be initiated as early as Year 2 and continue throughout the mine life. An early and progressive approach to reclamation will reduce the duration of direct habitat loss and sensory disturbance to wildlife. Refer to the Vegetation Protection Plan for additional information on progressive reclamation.
- Natural vegetation will be maintained where possible to minimize direct habitat loss and limit erosion and sedimentation. Retained vegetation also decreases the amount of reclamation required at closure.

### ***Road Design and Traffic***

- By designing the NAR to follow existing roads wherever possible, Newmont will minimize the amount of wildlife habitat lost to the Project and limit the increase in road access through the area.
- Project-related traffic on the NAR will be relatively low which will limit the potential for wildlife collisions and potential disturbance to wildlife along the road.
- The NAR will be designed for speeds of 50 km/hr. These speed limits will increase the chance of vehicles being able to stop before colliding with wildlife.
- New sections of road will be designed to avoid important wildlife habitat features and sensitive habitats, where possible.
- Where possible, roads will be designed with clear lines of sight to increase the ability of drivers to see wildlife or other hazards.
- The road embankments will be lower profile (i.e., shorter, and shallower), where possible, to minimize the potential for the road to filter or act as a barrier to wildlife movements.
- Where road embankments may pose a barrier to wildlife movement (e.g., >2 m high banks, extending for >500 m, or located in an area of known wildlife movement), wildlife crossings will be constructed. The exact design of wildlife crossings will be site-specific but will incorporate a gradual grade to facilitate wildlife use.
- The selection of borrow sources for road material will target existing borrow sites or areas in existing disturbance (e.g., placer tailings). Where new borrow sources must be established, to the extent possible, borrow sources will be developed outside of areas known to be important to wildlife (e.g., known movement corridors, cliff nest sites).
- Operations along the NAR will shut down for the fall freeze-up Suspension Period (approximately 6-week closure, November to December) and the spring thaw Suspension Period (approximately 4-week closure, April to May). These closures will help minimize effects to wildlife during the spring and fall seasons.

## **4.2 General Wildlife Protection Measures**

The following general wildlife protection measures will help to minimize effects on wildlife and wildlife habitat, and will apply to all aspects of the Project:

- Domestic pets will not be allowed on site.

- Hunting of wildlife will be prohibited at all times for all site personnel while working in the Project area (both on and off-shift during rotation at camp).
- Feeding of wildlife will be prohibited.
- Harassing or approaching wildlife will be prohibited, except for the hazing of dangerous animals (refer to Section 4.2.2) or animals present on the airstrip while aircraft are using the area. If animals need to be moved from the airstrip, the Environment Department staff or trained delegate will encourage the animals to move off the airstrip in a non-invasive way, for example by slowly (10 km/hr) driving a light vehicle towards them. If large numbers of caribou are present, mitigation measures listed in Section 4.3.1 apply. Newmont will consult with a wildlife biologist and Yukon Government as needed.
- Employees not directly tasked to monitor or respond to wildlife will be instructed to not approach, take photos, or spend prolonged periods observing wildlife (to minimize habituation to humans).
- A wildlife sighting log will be maintained by on-site personnel through all Project phases. Employees will be required to report all wildlife sightings along the road and near Project facilities; the Environment Department will be responsible for tracking all wildlife observations.

#### **4.2.1 Project Personnel Wildlife Awareness Orientation**

Newmont will implement a wildlife awareness program as a part of the Project orientation for both Project employees and contractors to increase awareness of Newmont's commitment to protecting wildlife and wildlife habitat in the Project area. Personnel will receive an introduction to basic wildlife-related information relevant to the Project and an overview of relevant wildlife mitigation measures, as well as an awareness of the consequences of a failure to follow wildlife mitigation measures. The objectives of the wildlife awareness orientation will be as follows:

- Provide workers with knowledge of why interactions with wildlife are important to manage.
- Provide workers with an understanding of the course of action to be taken in a variety of circumstances involving wildlife encounters.
- Provide workers with guidelines for reporting wildlife observations, incidents and near misses.
- Emphasize the role of adaptive management in realizing effective mitigation for wildlife. The process for making changes based on adaptive management is described in the Environmental Monitoring and Adaptive Management Plan.

#### **4.2.2 Reduce Human-Wildlife Encounter Risks**

Newmont will implement a wildlife management protocol to reduce the potential for wildlife-human interactions in the Project footprint and help ensure employee safety while minimizing potential mortality of wildlife due to threats to life or property. Elements of the wildlife management protocol include:

- Waste management will be strictly enforced as per the Waste and Hazardous Materials Management Plan, including:
  - Bear-proof garbage cans will be located outside buildings in high traffic areas for the collection of general waste, and most waste will be kept inside until collection.

- Items disposed of in the onsite landfill will be restricted to materials which should not act as wildlife attractants; however, the landfill will be monitored for wildlife and if wildlife are found to frequent the landfill, an electric fence will be placed around it.
- Food waste will be incinerated daily or composted in a fashion that does not attract wildlife.
- Domestic wastewater and sewage will be treated and disposed of in a fashion that does not attract wildlife.
- Periodic audits will be conducted to assess the effectiveness of waste management practices and regular surveillance of Project facilities and waste disposal sites will ensure that wildlife control measures are effective.
- Warning signs will be posted in areas of frequent wildlife encounters on a seasonal basis or as otherwise determined to be required through monitoring and observation reporting.
- Any observation of bears or other wildlife acting defensively, showing signs of human habituation, or acting aggressively will be immediately followed up on by designated personnel who have received appropriate training in monitoring, managing, and evaluating human-wildlife conflicts. If a specific animal becomes a concern, Yukon Conservation Officer Services will be contacted for advice on appropriate actions.
- In the event of bear encounters, several types of bear deterrents will be employed including bear spray, air horns and if warranted, projectile deterrents (bangers, rubber bullets or bean bags). Firearms will only be used as a last resort in the event of a bear encounter when all other methods of deterrents have failed. This also applies to other potentially dangerous animals. If animals are killed in defense of life or property, Yukon Conservation Services will be consulted regarding disposal and any other actions to be taken.
- The Environment Department will track all reports of Project-related mortality and if warranted, will conduct a follow-up investigation to document the nature of the incident and determine the cause, if possible, to reduce the risk of similar events in the future. Refer to the Wildlife Mortality Monitoring Program in the Wildlife Monitoring Plan for further details.
- Yukon Conservation Officer Services will be notified of any furbearer fatalities and will be consulted for disposal. Newmont will also consult with First Nations for all furbearer and any other wildlife fatalities of interest to them and will have a plan in place for sending First Nations the carcasses of interest. This plan will be communicated to Yukon Conservation Officer Services and trapline holders.

#### **4.2.3 Minimize Habitat Loss**

Habitat loss can result from both the direct loss of habitat due to vegetation clearing within the Project footprint and indirect loss of habitat due to sensory disturbance adjacent to the Project footprint. Direct habitat loss will primarily occur during construction. Impacts resulting from direct habitat loss will be minimized as much as possible through Project design (Section 4.1) and Construction mitigation (Section 4.4). Indirect loss of habitat due to sensory disturbance may occur during the life of the Project, because of light, noise, dust, and other sensory disturbance from Project activities, including vehicle operation, use of explosives, and camp occupation, among others. Impacts resulting from sensory disturbance will be minimized through the implementation of both general operating procedures (for example, Section 4.2.4 Manage Road Operations and Section 4.2.5 Manage Aircraft Operations) and species-specific mitigations (Section 4.3). Refer to the Vegetation Management Plan, the Air Quality and Greenhouse Gas Management Plan, and the Noise Management Plan for additional mitigation measures

that will contribute to the protection of wildlife habitat and the limiting of sensory disturbance. Further to these measures:

- In accordance with Decision Document Term #5, Newmont will retain a professional qualified in caribou behaviour to implement design features to avoid caribou entrapment and reduce potential noise, visual and light stimuli in alpine and subalpine habitats of high importance to caribou and are within line of sight of the mine site's activities to reduce the potential zone of influence. Refer also to Section 4.2.6 and Section 4.4.

#### 4.2.4 Manage Road Operations

Operations along both the NAR and Mine Site access roads will be managed to limit the potential effects to wildlife including disturbance to wildlife along roads, barrier or filter effects to movement, and mortality resulting from vehicles collisions or other indirect effects of road use. In addition to the reduced effects associated with low traffic volume and low speed limits that are part of the Project design, mitigation measures that will be implemented to minimize the effect of road operations on wildlife include:

- Wildlife will have the right-of-way along all Project roads:
  - Vehicle operators will be vigilant, watching for wildlife near roads, and will take all reasonable actions to avoid collisions with wildlife.
  - If any wildlife is observed on the road, traffic must stop as far back as safely possible; if after five minutes the animals have not moved off the road, the vehicle may proceed slowly and cautiously. An operational decision tree matrix for drivers dealing with wildlife along Project roads is provided in Figure 41.
- Road signage, both permanent and temporary, will be erected to inform users regarding wildlife issues along Project roads as necessary.
- Speed limits will be posted along Project roads, including additional speed restrictions for the protection of wildlife along specific sections of road if deemed necessary.
- No-stopping areas may be designated in sensitive wildlife areas as determined by Project monitoring and Project biologists; no-stopping areas will have signs posted.
- Temporary road closures and/or traffic restrictions for Project vehicles may be implemented as required to mitigate adverse effects to wildlife (e.g., during caribou migration, refer to Section 4.3.1).
- All incidents between vehicles and wildlife must be reported to Newmont's Safety and Environment Department whether they are near-miss, collision with wildlife injury, or collision causing accidental wildlife death:
  - Each incident will be investigated by the appropriate Supervisor and the Environment Department, and if applicable measures to avoid recurrence will be implemented. Disciplinary measures will be taken against any employee or contractor if the investigation concludes that the accident is the result of negligence.
  - Where appropriate, the Environment Department will notify Yukon Conservation Officer Services and First Nations of the incident.
- Where safe to do so and allowed by other design considerations, snowbanks will be managed and maintained to less than 0.5 m high where safe to do so and allowed by other design considerations and will include periodic breaks to allow wildlife to move across the road, spaced

between 500 m and 1 km apart (depending on the terrain and observed animal use) on alternating sides of the road. In particular, Newmont will focus snowbank breaks in areas of frequent wildlife crossings that were identified during baseline studies or during Project operations (e.g. in areas where caribou are repeatedly observed crossing or where moose are observed congregating. Refer to Section 4.3).

- All truck drivers will be required to document all wildlife observations.
- Wildlife observations along the road will be communicated to nearby drivers via radio communications (e.g., “three moose north of km 45”) to ensure drivers are informed of potential hazards; communication of wildlife locations may be suspended if the communication presents a larger risk to wildlife (e.g., moose locations during hunting season).
- Newmont will have personnel that are responsible for monitoring conditions of the NAR and advising Newmont road users of potential hazards and wildlife issues along the route; these individuals will also record and report any potential wildlife mortalities along the NAR.

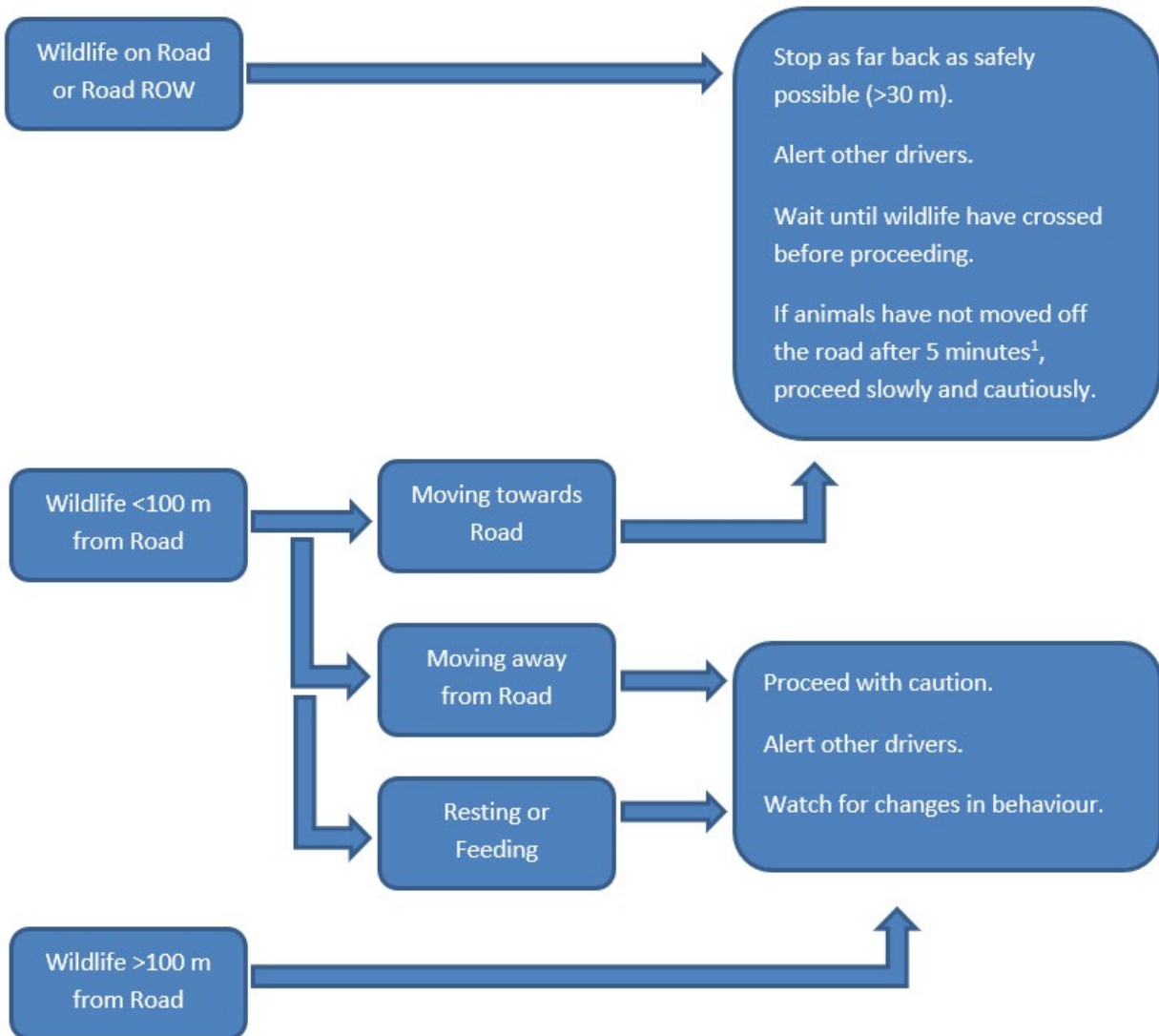


Figure 4-1 Project Wildlife and Road Operations Decision Matrix Access Management

Newmont has heard many concerns regarding potential effects to wildlife from public access of the NAR, particularly relating to the potential for increased harvest and wildlife collisions. To help address these concerns, Newmont will continue to engage with representatives from First Nations, government regulators, and current road users. Many of the mitigation measures outlined above for Project operations along the NAR will also contribute to limiting effects from public use (e.g., road signage). Additionally, the following measures will be implemented to limit public access to the NAR south of the Stewart River:

- An access restriction point will be established at the southern end of existing access along the Maisy May Creek section of the NAR (approximately 2.8 km northeast of the north Stewart River barge landing) using a gate or similar method.
- Only authorized, mine-related vehicles will be permitted on Newmont-operated barges and ice bridges on the Stewart and Yukon rivers.

Additional details on access management are provided in the Access Route Construction Management Plan and Access Route Operations Management Plan.

#### **4.2.5 Manage Aircraft Operations**

Aircraft operations, including both fixed-wing aircraft and helicopters, will be managed to limit the potential effects to wildlife. Where possible, Newmont will follow the guidance outlined in *Flying in Caribou Country: How to Minimize Disturbance from Aircraft* (Environment Yukon 2010) and *Flying in Sheep Country: How to Minimize Disturbance from Aircraft* (Environment Yukon 2006). Subject to safety considerations and pilot discretion:

- All Project-related aircraft will maintain a minimum cruising altitude of 300 m above ground level. Between May 1 and June 30, the minimum cruising altitude will be increased to 600 m above ground level when caribou have been identified in the area (for the protection of calving caribou). This window will be extended as necessary based on seasonal caribou presence documented through wildlife monitoring activities (refer to the Wildlife Monitoring Plan, Section 3.0: Wildlife Observation Monitoring, and Section 6.0: Caribou Monitoring) or reported by Environment Yukon, First Nations, or local observations (refer to Section 4.3.1 of this Plan).
- The south-facing slopes/cliffs along the north side of the Yukon River are known to support nesting raptors during the nesting season and thimhorn sheep year-round; aircraft will maintain a cruising altitude of 600 m above ground when flying over the south-facing slopes above the Yukon River or maintain a horizontal distance of at least 1,000 m from these slopes to minimize potential sensory disturbances associated with aircraft.
- Hovering or circling over wildlife will be avoided as this can greatly increase disturbances.

Newmont will follow these measures whenever possible and when guidelines do not conflict with Canadian Aviation Regulations. Weather conditions or other safety considerations may require deviation from flight paths or preferred elevation (e.g., aircraft may be required to adjust flight altitude to avoid conflicts with other planes). Exceptions will also be permitted for low-level flights and/or flights along the Yukon River during wildlife surveys, as directed by Project biologists in accordance with wildlife research permits.

#### **4.2.6 Prevent Wildlife Entrapment**

The risk of wildlife mortality resulting from interactions with Mine Site infrastructure was considered during Project design. During project planning, Yukon Government was consulted regarding design-level

strategies to mitigate potential impacts, particularly to caribou — this consultation identified concerns regarding potential entrapment within the pit, and pinch points/barriers to caribou through the mine site. To limit the potential for wildlife entrapment in Mine Site infrastructure, several design elements and mitigation measures were developed.

- Heap Leach Facility event ponds will be fenced, and ball covers will be utilized during Operation to prevent access by wildlife.
- Where Open Pits could present a hazard that is not readily visible to approaching wildlife, and where safe to do so, efforts will be made to limit the risk by strategically placing barriers or boulders or creating berms to prevent access to the edges of the pit such that any approaching wildlife would be forced to slow down or recognize the risk.
- Open Pits will all have access roads which animals could use to exit the pit if necessary; access roads will remain in place during Reclamation and Closure to avoid potential for wildlife entrapment within the pits. Should any wildlife be observed in an Open Pit during Construction or Operation, the Environmental Department will be contacted for guidance which could result in a slow down or pausing of activities if it is determined that the wildlife cannot exit the pit safely without modifying activities. A similar approach to airstrip management may also be employed.
- During Construction, a qualified wildlife professional will be retained by Newmont to identify design features, in consultation with the Yukon government, that can be implemented to avoid caribou entrapment in accordance with Decision Document Term #5. Refer also to Section 4.4.

### **4.3 Species-Specific Mitigation**

#### **4.3.1 Caribou**

##### **4.3.1.1 Fortymile Caribou**

As discussed in Section 3.1, the Project overlaps the current range of the Fortymile caribou herd. Based on the observed use of the RSA since 2013, the herd is not expected to interact with the Project every year (and may be largely absent from the Project area until the herd begins to increase in size again). However, in years when the Fortymile caribou do overlap the Project area, caribou may be present from October through April. During the fall migration period (October to November) and the spring migration period (February to April), the Project could interact with large groups of caribou moving through the area. Additionally, during the winter months, groups of Fortymile caribou may be found inhabiting suitable habitats throughout the region. To address potential effects to the Fortymile caribou, a phased approach to mitigation will be followed (Table 4-1; Figure 4-2), which will be triggered by increasing proximity of collared caribou<sup>2</sup> or the observations of large numbers of caribou (i.e., approximately 500 caribou; may be a single large group or multiple smaller groups combined)<sup>3</sup>. During the Fortymile caribou migration season, the

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<sup>2</sup> The use of collared caribou as a trigger assumes that collared caribou are representative of large numbers of caribou; if observations indicate that is not the case, mitigation may be scaled back. At present, there are between 50–60 satellite collars deployed on the Fortymile Caribou Herd (M. Suitor, personal communication, 16 August 2023) which is estimated at 38,000 caribou (Alaska Department of Fish and Game 2023).

<sup>3</sup> Observations regarding caribou crossing the NAR may be received from drivers on the NAR, local/First Nations observations, Environment Yukon, or Newmont Environment department monitoring.

Environment Department will be in regular weekly contact<sup>4</sup> with Environment Yukon to get updates on the location of collared Fortymile caribou; information from Environment Yukon will help estimate caribou numbers and direction of travel<sup>5</sup>.

The Newmont Environment Department will be responsible for on site wildlife monitoring during Project Construction and Operation; this will include focusing on caribou monitoring at peak times when caribou are anticipated to travel through or near the site. Although the Environment Department has several roles, they will prioritize caribou monitoring when necessary. Independent professionals, such as a wildlife QEP, will also be involved as needed — specifically, the Environment Department will notify the wildlife QEP if information from Environment Yukon (acquired via the weekly check-in during the migration season) indicates that the Fortymile Caribou Herd is actively migrating and is on a path that may intercept the Project footprint (in advance of caribou crossing into the Response Level 1 area (Figure 4-2, Table 4-1). The QEP will then maintain regular communication with the Environment Department to provide advice and support until the herd has either passed through the Project footprint, halted their migration or changed direction such that they are no longer expected to encounter the Project. If warranted, the QEP may join the onsite team to prepare for a major migration through the Project footprint. The actions provided in the following table have been developed to respond to increasing numbers of caribou at key times of year. Some of these mitigation actions may be modified through the life of the Project based on the success of mitigations, as well as in response to changing environmental conditions, as part of the adaptive management approach (i.e., numbers of caribou, frequency or duration of caribou within the Project area).

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<sup>4</sup> Frequency of communication may be adjusted or paused based on the location of the caribou and the progress of migration. For example, if it becomes apparent that migrating caribou are moving in a direction unlikely to encounter the Project, communications may be suspended for the season. Conversely, if caribou are actively migrating and appear to be headed towards Project infrastructure, Newmont may increase the frequency of check-ins with Environment Yukon.

<sup>5</sup> Data from satellite collars update approximately every 36 hours; consequently, locations received from the collars may be up to 2 days old (M. Suitor, personal communication, 16 August 2023). If delays in satellite uptake from active collars and/or data analysis by Environment Yukon are observed, these delays will be accounted for in consultation with Environment Yukon (e.g., by adding approximate distance covered within the delayed period).

**Table 4-1 Phased Response to Fortymile Caribou**

Timing	Response Level	Spatial Extent	Mitigation
Annually Prior to October	--	--	<ul style="list-style-type: none"> <li>Newmont will conduct an annual scenario training session with site personnel to review the response to caribou migration.</li> </ul>
October through April	Response Level 1	Triggered by one or more collared caribou crossing the White River (west of the Mine Site) or the Yukon River (west of the NAR), the Donjek or Klotassin Rivers (south of the Project), and/or the Klondike Highway (north of the Project) - see Figure 4-2.	<ul style="list-style-type: none"> <li>General mitigation measures apply.</li> <li>Heightened alert by site personnel, including communication to the site management team. The Environment Department will be in regular communication with Environment Yukon to track the location of Fortymile caribou and with the Project QEP. All site personnel will be notified that caribou are in the area and personnel must be alert to the presence of caribou. Any observations of caribou will be reported immediately to Environment Department.</li> </ul>
October through April	Response Level 2	Triggered by one or more collared caribou within 10 km of Project activities OR observations of several hundred caribou within 10 km <sup>6</sup>	<ul style="list-style-type: none"> <li>General mitigation measures and Response Level 1 caribou mitigation measures apply.</li> <li>The Environment Department will inspect Project infrastructure in the relevant area to ensure that caribou are not blocked from moving through the area and that caribou will not get caught in infrastructure (e.g., fencing).</li> <li>If caribou are known to be migrating within 10 km of the NAR:               <ul style="list-style-type: none"> <li>Monitoring will be conducted on the relevant section of road for caribou presence.</li> <li>Site personnel will direct traffic through the area; accordingly, if indicated, additional signage and/or speed restrictions may be implemented.</li> </ul> </li> <li>Project-related aircraft will increase the minimum cruising altitude to 600 m above ground level.</li> </ul>

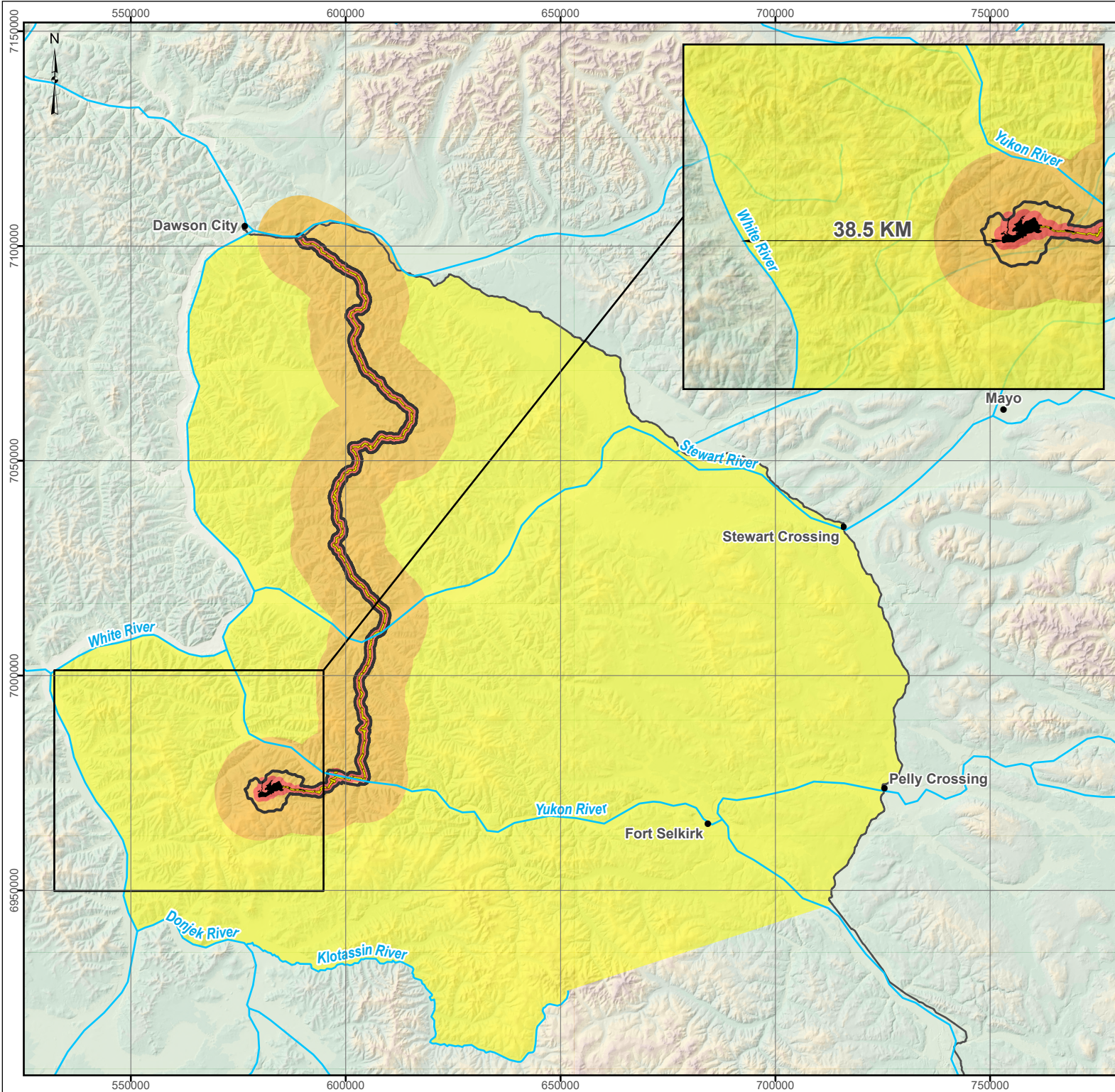
<sup>6</sup> The originally proposed 6 km zone of influence was based on the results of Johnson and Russell 2014 for the Porcupine Caribou Herd. In 2024, EDI conducted an analysis (at the request of White River First Nation) on Fortymile caribou migration speeds based on satellite collar data from 2013 to 2016. This analysis found that caribou travelled an average of 8 to 11 km per day during the migration season. Therefore, the distance for Response Level 2 was updated to 10 km to allow a 24-hour response period.

Timing	Response Level	Spatial Extent	Mitigation
			<ul style="list-style-type: none"> <li>• Non-essential helicopter flights in the relevant area will be restricted to reduce disturbance.</li> <li>• If there are indications that a large group of caribou may be moving towards the Mine Site, staff may be transported to adjacent ridges to monitor for caribou with binoculars or spotting scopes.</li> <li>• The Environment Department and relevant site managers will start preparing for potential triggering of Response Level 3 to ensure that mitigation measures can be enacted quickly and effectively if needed.</li> </ul>
<p>October through November, February through April (applies to migratory movements only; does not apply to overwintering groups of caribou)</p>	<p>Response Level 3</p>	<p>Triggered by one or more collared caribou within 1 km of Project activities OR observations of large numbers of caribou (i.e., approximately 500 caribou, or several large groups, e.g., five groups of 100, ten groups of 50, etc.) within 1 km OR observations of caribou consistently crossing<sup>7</sup> the NAR over a period of three days</p>	<ul style="list-style-type: none"> <li>• General mitigation measures and Response Level 1 and 2 caribou measures apply.</li> <li>• The Environment Department will monitor the movement of caribou through the area.</li> <li>• If caribou (as defined above) are within 1 km of the NAR: <ul style="list-style-type: none"> <li>▫ Newmont will temporarily stop all Project-related traffic along the NAR (except for maintenance purposes or in case of an emergency).</li> </ul> </li> <li>• Normal road use shall not resume until caribou are considered to have cleared the road corridor. If caribou are moving through the area for longer than 24 hours, the Environment Department will work with Environment Yukon and Energy, Mines and Resources, Compliance, Monitoring and Inspections (EMR CMI) to determine an appropriate level of project activity.</li> <li>• If caribou (as defined above) are within 1 km of a blast site: <ul style="list-style-type: none"> <li>▫ Blasting may be temporarily suspended (up to 24 hours). If caribou are moving through the area for longer than 24 hours, the Environment Department will work with Mine Operations to time blasting to have the least disturbance on caribou.</li> </ul> </li> </ul>

<sup>7</sup> Defined as multiple observations of caribou per day over subsequent days such that the collective number of caribou observed crossing the road is >250 animals. This trigger is intended to capture slower and/or more dispersed migratory movements where numerous smaller groups of caribou are observed crossing over multiple days; to the extent discernable, attempts should be made to differentiate between groups of caribou and avoid double-counting multiple observations of the same group.

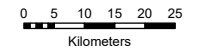
Timing	Response Level	Spatial Extent	Mitigation
			<ul style="list-style-type: none"> <li>Environment Department will contact the Environment Yukon regional biologist and EMR CMI to discuss Project activity if the caribou remain in the area for more than one week or if caribou presence is affecting operations. Newmont will inform affected First Nations of the results of any discussions with Yukon Government regarding caribou interaction with project activities.</li> </ul>

**Figure 4-2. Fortymile Caribou Phased Response Areas**



**Legend**

- Settlement/Community
  - Klondike Highway
  - Northern Access Route
  - Watercourse
  - Project Footprint
  - Local Study Area
- Fortymile Caribou Response Area**
- Level 1
  - Level 2
  - Level 3



Map Scale: 1:150,000 (Printed at 8.5 x 11)  
 Coordinate System: NAD 1983 UTM Zone 7N

**Data Sources**  
 1:50,000 Topographic Spatial Data courtesy of Her Majesty the Queen in Right of Canada, Department of Natural Resources. All Rights Reserved.

Digital Elevation Model and 1:250,000 National Topographic Database (NTDB) provided by Geomatics Yukon - Yukon Government via online source (Corporate Spatial Warehouse) www.geomaticsyukon.ca.

**Disclaimer**  
 This document is not an official land survey and the spatial data presented is subject to change. Project data displayed is site specific.

Drawn: AR / OL	Checked: AM	Date: 2024-09-23
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#### **4.3.1.2 Klaza Caribou**

The Mine Site also overlaps with the annual range of the Klaza caribou herd — small numbers of Klaza caribou may be observed occasionally during the spring, summer, or fall seasons. Project design and General Wildlife Protection Measures outlined above are expected to limit effects to Klaza caribou. Should the Klaza caribou use the winter habitat near the Mine Site, then mitigation universal to all caribou will apply. Additionally, to minimize potential disturbance to pregnant females or cows with young calves, during the calving and post-calving season (May 1 to July 31), helicopters will be required to maintain a flight altitude of 600 m when caribou have been identified in an area (see Section 4.2.5).

#### **4.3.2 Moose**

The Project effects assessment included evaluation of several potential Project-related effects to moose including effects to habitat, mortality, and moose congregations during the post-rut/early winter period. Most of these potential interactions will be mitigated through the Project Design and General Wildlife Protection Measures, in particular, several of the mitigation measures developed for the NAR design (Section 4.1) and NAR operations (Section 4.2.4). Additionally, construction activities will be timed to avoid important habitat for moose during sensitive times, wherever possible (Section 4.4), including:

- Moose congregation areas during the post-rut (late-October to December)
- Late winter moose habitat (February to April).

To reduce the potential for vehicle-wildlife collisions and disturbance to moose in post-rut areas, additional signage and/or traffic restrictions may be implemented seasonally when required. Moose post-rut congregation areas were identified in the Coffee Gold Mine: Wildlife Baseline Report (September 2016). Moose are known to congregate in these areas from late October through December — this period is expected to largely overlap with the period when the NAR will be shut down for fall freeze-up, although this may vary from year to year. If road operations in the identified congregation areas overlap the post-rut period, speed limits will be further reduced in areas of decreased visibility, such as in corners, to reduce the risk of disturbance and collision. Signage alerting drivers to potential increased moose presence in the area may also be established (this should be weighed against the potential to attract attention to the location, potentially resulting in local increased moose harvest). These additional mitigations will be put in place with the advice of the Project's wildlife biologist. During the post-rut season, information regarding mitigation measures can be communicated to personnel at morning tailgate meetings as necessary and to drivers of Project vehicles using the NAR.

#### **Mineral Lick**

Surveys along the NAR in 2017 identified an active mineral lick frequented by moose located in the LSA, between the Stewart and Yukon rivers. No direct effects to the lick are expected from Project activities; however, wildlife using the lick may experience sensory disturbance from the Construction and Operation of the NAR. Following discovery of the mineral lick, Newmont set up remote cameras to document species using the lick, the level of use, and the timing of this use. This data was analysed in the Coffee Gold Project: 2020 Terrestrial Studies Report (EDI 2021) to aid in developing mitigation measures for the protection of the site. During Project Construction and Operation, remote camera monitoring of the site will continue to watch for any changes in ungulate use of the site resulting from road use; information gained from this

monitoring will be used to inform adaptive management of the site as warranted — refer to the Wildlife Monitoring Plan for further details on mineral lick monitoring.

To minimize adverse effects to the mineral lick, the following mitigation measures will be implemented:

- The location of the mineral lick is to be kept **strictly confidential** to avoid it becoming a target for local hunters. The precise location should not be displayed on maps (construction maps will highlight a section of road that occurs adjacent to the lick, not the location of the lick itself) or disclosed to staff or contractors except on a need-to-know basis. Similarly, there will be no road signage that may draw attention to the lick (although wildlife awareness signage may be posted along the relevant section of the NAR).
- Minimize road construction and road maintenance activities within a 1-km buffer of the mineral lick during the seasonal window of peak ungulate activity (i.e., June through August). For work within 1-km of the mineral lick in April, May, September, October, and November, wherever possible, concentrate road construction and road maintenance activities between 9:00 am and 6:00 pm to avoid daily peaks in ungulate activity (EDI 2021).
- Identify and plot the trail network leading to and from the site, nearby security cover, and adjacent foraging sites, and protect and avoid these features to the extent possible during road construction. As with the location of the lick, the location of these trails should be kept strictly confidential.
- After construction, increase the awareness of Project-related vehicle drivers of the greater likelihood of encountering ungulates along the relevant section of the NAR. The reason and specific location of the lick should not be disclosed for the protection of the site.

#### 4.3.3 Thinhorn Sheep

The cliffs on the north side of the Yukon River are known to support small numbers of thinhorn sheep. While the Project will not directly affect sheep habitats, the NAR may intersect sheep movement along the Yukon River, and Project activities (including both road traffic and aircraft) may result in sensory disturbance to sheep in this area. Mitigation measures for Aircraft Operations (Section 4.2.5) will help mitigate potential effects to sheep from Project aircraft. Additionally:

- To the extent feasible, road construction will be timed to avoid activity near the Yukon River cliffs during the lambing season (see Section 4.4).
- Where the NAR passes between the Yukon River cliffs along lower Ballarat Creek, a reduced speed zone or additional signage may be implemented to limit potential risks to sheep moving through this area where crossings have been documented to occur.
- Special care will be taken so that road Construction and Operation activities do not create a barrier to sheep movement through this area. Specifically:
  - Avoidance of tall, steep road banks
  - Snow clearing and piling in a way that will minimize hindrance to sheep crossing the road.

#### 4.3.4 Carnivores

Project-related effects to large carnivores will be mitigated through the application of the Project Design and General Wildlife Protection Measures. In particular, management of Project waste and other potential attractants is critical to minimizing potential effects to bears and other carnivores; as such, waste

management protocols will be included as part of the employee orientation for all employees and contractors. Waste management protocols for the Project will be strictly enforced (see Section 4.2.2).

Carnivore dens are considered important wildlife features, particularly for those species that regularly re-use den sites. Typically, bears re-use dens only occasionally, although they often re-use denning areas. Wolves are known to re-use dens and denning areas for generations. Wolverine natal dens may get used during subsequent years or may occur in similar areas. Consequently, construction activities will include efforts to leave any identified dens structurally intact wherever possible. Newmont will establish a no-disturbance buffer around active dens during the denning period (refer to Section 4.4).

#### **4.3.5 Bats**

The Project effects assessment evaluated potential Project-related effects to little brown myotis, particularly regarding effects to active bat roosts. To minimize potential effects:

- Pre-clearing surveys for bat roosts will be conducted prior to the commencement of construction activities within 100 m of the Project footprint in areas with a high potential to support bat roosts (i.e., habitats below 1,000 m in elevation with suitable rock faces/cliffs or old forest with large trees (average diameter-at-breast-height >25 cm)).
- Any identified bat roosts will be left structurally intact, and a no-disturbance buffer will be established around active roosts (see Section 4.4).

#### **4.3.6 Birds and Bird Nests**

The Project area contains a wide variety of habitats that provide breeding habitat for multiple bird species including raptors, waterbirds, waterfowl, shorebirds, and upland birds, including several species at risk (Section 3.2). To protect birds nesting within the Project area, several mitigation measures have been developed in addition to the Project Design and General Mitigation Measures identified above:

- Nest-specific management plans will be developed for all known raptor nests within 1 km of the Project footprint; where possible, plans will include a site-specific no-disturbance for Project personnel and equipment around active nests during the breeding window.
- Although no Sharp-tailed Grouse lek sites that interact with the NAR have been located, should leks be identified in the future, Project-related travel through lek sites may be restricted during certain times of day over sensitive periods.
- During construction, vegetation clearing will be conducted outside of the migratory bird nesting period (May 1 to August 15), wherever practical. If clearing outside of the bird nesting period is not possible, bird nest surveys will be conducted prior to clearing and any active nests identified will be protected within a no-disturbance buffer (Section 4.4). Nests of certain species (such as raptor nest sites identified during baseline surveys) will be protected year-round, regardless of if they are actively being used.
- Event ponds will be covered by ball covers during Operation to prevent access by wildlife. As an added mitigation to prevent bird exposure to contaminated water in the event ponds, scare cannons will be employed as needed to deter birds from using the Ponds. The Environment Department will monitor the Events Ponds regularly to ensure that deterrence measures are effective in preventing bird use of the Ponds and are not creating additional environmental

management issues. If monitoring determines that deterrence measures are not effective, alternate methods of bird deterrence will be used.

#### 4.4 Procedures During Construction Phase

Many of the predicted effects on wildlife will occur during the Construction Phase of the Project. Wildlife habitat will be removed during Project Construction, both through direct removal of habitat and functional loss of habitat due to sensory disturbance. Wildlife will also experience increased risk of mortality from Project infrastructure and activity. These Project-related effects will be managed through the implementation of the Project Design (Section 4.1), General Wildlife Protection Measures (Section 4.2) and Species-Specific Mitigation (Section 4.3). Additionally, several specific mitigation procedures will be implemented during Construction to reduce or remove potential effects to wildlife and wildlife habitat during this phase:

- Where practical, and not a risk to human safety, a Stop Work policy will be implemented when wildlife in the area may be endangered (i.e., risk of physical injury or death) by the work being conducted.
- Prior to site preparation or construction works, Project footprint boundaries and known wildlife habitat features, or sensitive areas will be clearly marked on site plans and in the field by a qualified environmental professional.
- Construction activities will be timed to avoid sensitive habitats during sensitive times. If construction activities must occur during sensitive periods, additional monitoring and/or mitigation will be implemented. Sensitive habitats/time periods include:
  - Fortymile caribou movement areas during migration (October to November, February to April) when Fortymile caribou are present
  - Moose congregation areas during the post-rut (late-October to December)
  - Late winter moose and caribou habitat (February to April)
  - Sheep habitat during the lambing season (mid-May to mid-June)
  - The identified mineral lick from June through August, with additional restriction April–May and September–November (refer to Section 4.3.2).
- No-disturbance buffers will be established around identified wildlife habitat features (e.g., mineral licks, dens, and bat roosts) during sensitive periods, as per the setback distances identified in Table 4-2 and Table 4-3.
- Outside of sensitive periods, wildlife habitat features will be kept structurally intact wherever practical.
- Prior to Construction, pre-clearing surveys for bat roosts will be carried out in habitats with high potential to support roosts (i.e., habitats below 1,000 m in elevation with suitable rock faces/cliffs or old forest with large trees (average diameter-at-breast-height >25 cm)) within 100 m of the Project footprint. A no-disturbance buffer will be established around any identified roosts as per Table 4-2.
- Prior to Construction, the trail network leading to and from the identified mineral lick will be mapped, and efforts will be made to avoid these features to the extent possible during road construction. As with the location of the lick, the location of these trails should be kept strictly confidential. Refer to additional details in Section 4.3.2.

- During Construction of the mine, a wildlife QEP will conduct a site visit to look for on site hazards from the perspective of caribou, to identify any potential issues and, if necessary, develop additional mitigation measures as required under Decision Document Term #5 (YESAB 2022). Newmont is willing to facilitate the participation of Yukon Environment and/or representatives from local First Nations in this review if requested.
- Vegetation clearing will be conducted outside of the migratory bird nesting period (May 1 to August 15) wherever possible. If clearing outside of the bird nesting period is not possible, pre-clearing bird nest surveys will be conducted prior to clearing. Survey methods will follow best management practices, and will include the following:
  - Surveys will be conducted by qualified individuals who are experienced in performing pre-clearing surveys and have knowledge of regional bird species. Surveys will follow established methods for conducting pre-clearing nest surveys.
  - Surveys will extend beyond the Project footprint to the distance of the appropriate no-disturbance setbacks (see Table 4-3) based on the habitat.
  - Survey information including date, time, survey effort, and details on any nests located (e.g., location, species, nest status, photos etc.) will be documented on standardized forms.
  - A no-disturbance setback around active nests will be established until chicks have fledged or the nest is determined to have been predated or abandoned. Recommended no-disturbance setbacks are listed in Table 4-3.
  - Once the survey is completed, clearing activities will be completed within a three to seven-day window<sup>8</sup> (in areas where no nests have been found).
  - Survey results will be communicated with the on-site Construction Supervisor.

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<sup>8</sup> Exact length of the window is dependent on the timing of clearing within the migratory bird nesting period and the level of bird activity observed. Determination of the length of the window beyond 3 days will be made in consultation with a QEP.

**Table 4-2 Recommended No-disturbance Buffers for Important Wildlife Habitat Features**

Wildlife Habitat Feature	No-disturbance Buffer <sup>1,2</sup>	Sensitive Period	Comments
Mineral lick	200 m	April – November	In addition to the no-disturbance setback, the integrity of high to moderate use wildlife trails leading to the lick must be maintained, including outside the 200 m buffer. Seasonal windows of peak ungulate activity will be avoided for road construction and maintenance.
Sharp-tailed Grouse lek sites	500 m	April – mid-May	When leks are inactive, Project activities may occur up to 100 m from the lek site; however, development that removes suitable foraging habitat should be avoided.
Active bear dens	1 km for blasting 300 m for other activities	October – early May	Outside of the denning season, Project activities may proceed outside of a minimum 25 m buffer, but the den site must be kept intact.
Active wolverine dens	1 km	January – June	Outside of the denning season, Project activities may proceed but a minimum 300 m buffer must be maintained around the denning site (including any rock piles, downed trees, or other debris).
Active wolf dens	800 m	April – September	Outside of the denning season, Project activities may proceed but the den site must be kept intact (buffer may be smaller than 800 m but minimum 300 m outside the denning season).
Bat roosts	100 m	May – August	In addition to the no-disturbance setback, the integrity of flight paths to the roost must be maintained.
Re-used raptor nest sites (Inactive)	Leave intact	N/A	Project activities may proceed, but care must be taken to ensure that the nest tree/cliff and the nest remain intact. For active raptor nest sites refer to Table 4-3.
Bank Swallow colonies (Inactive)	Leave intact	N/A	Project activities may proceed, but care must be taken to ensure that the nesting colony remains intact. For active colonies refer to Table 4-3.
Wildlife trees	Leave intact	N/A	Project activities may proceed, but care must be taken to ensure that the wildlife tree remains intact.

<sup>1</sup> If the recommended setback is not feasible, a site-specific mitigation and monitoring plan will be developed in consultation with the Project wildlife biologist and the appropriate authorities.

<sup>2</sup> Guidelines consulted for the development of no-disturbance setbacks, include the *Forest Resources Act: Wildlife Features Standard* (Yukon EMR 2014); *Guidelines for Industrial Activity in Bear Country* (Environment Yukon 2008); *Northern Land Use Guidelines: Northwest Territories Seismic Operations* (AANDC 2011); *Wildlife Habitat Features Summary of Management Guidelines: Northern Interior Forest Region* (B.C. MWLAP 2004); and *How Vulnerable are Denning Bears to Disturbance* (Linnell et al. 2000).

**Table 4-3 Recommended No-disturbance Buffers for Active Bird Nests**

Wildlife Habitat Feature	No-disturbance Buffer <sup>1,2</sup>
Cliff-nesting raptors (e.g., Peregrine Falcon, Golden Eagle)	500 m
Ground-nesting raptors (e.g., Short-eared Owl, Northern Harrier)	400 m
Tree-nesting raptors (e.g., American Kestrel, Red-tailed Hawk, Great Horned Owl)	200 m
Grouse/Ptarmigan	25 m
Waterfowl	50 m
Bank Swallow colonies	50 m
Common Nighthawk	50 m
All other nesting birds	10 m

<sup>1</sup> If the recommended setback is not feasible, a site-specific mitigation and monitoring plan will be developed in consultation with the appropriate authorities.

<sup>2</sup> Guidelines consulted in the development of recommended setbacks include the Yukon *Forest Resources Act*: Wildlife Features Standard (Yukon EMR 2014), Guidelines for Raptor Conservation during Urban and Rural Land Development in British Columbia (BC MOE 2013), and Technical Information: Buffer Zone and Setback Distances (Environment Canada 2014).

#### 4.5 Procedures During Operation Phase

The Operation Phase is the longest Project phase, with regular mining activities occurring throughout. Project-related effects to wildlife and wildlife habitats will be managed through the implementation of the Project Design (Section 4.1), General Wildlife Protection Measures (Section 4.2) and Species-specific Mitigation (Section 4.3). No additional mitigation measures have been developed specific to the Operation Phase.

## 5.0 WILDLIFE PROTECTION PLAN REPORTING

Once the Project is permitted and all licenses are acquired, Newmont will report annually on Project mitigation and monitoring activities related to wildlife and wildlife habitats, as part of general annual reporting required by the mine's Quartz mining license. The annual reporting will generally include the following key pieces of information relevant to the Wildlife Protection Plan:

- Summary of Project activities
- Summary of wildlife mitigation efforts and compliance with proposed mitigations
- Description of First Nations, regulators and/or stakeholder involvement
- Description of proposed changes to mitigation and monitoring plans, as required.

The Wildlife Protection Plan will be updated and revised on a recurring basis. Wildlife Protection Plan updates will consider monitoring results, management reviews, incident investigations, shared traditional or local knowledge, new or improved best management practices, regulatory changes, or other Project-related changes. Every three years, or as appropriate based on data collection, Newmont will review the results of the wildlife monitoring program and develop a detailed report on trends in monitoring indicators (refer to the Environmental Monitoring and Adaptive Management Plan for further details). Where indicated based on monitoring results, the Wildlife Protection Plan will be updated to ensure that mitigation measures adapt to the results of the Project effects monitoring.

## 6.0 REFERENCES

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# APPENDIX A

## Wildlife Protection Plan Table of Concordance

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Wildlife and Wildlife Habitat</b>				
1	The Proponent shall apply for a lease or another form of regulatory approval under the Territorial <i>Lands Act</i> that will provide the Proponent with the authority and ability to control access between Maisy May Creek and the Stewart River. The point of access control shall be the beginning of new road connecting the existing road network with the Stewart River barge landing. Access shall be restricted through means such as a gatehouse or equivalent access restriction until the road is decommissioned such that this section of new road not become a public road.	<b>Access Route Construction Management Plan</b> Section 2.0: Authorizations for Construction; Section 7.0: Access Tie-in, Access Control, and Staging Area <b>Access Route Operational Management Plan</b> Section 3.1: Access Control <b>Wildlife Protection Plan</b> Section 4.2.4.1: Access Management	Construction / Operation	
2	The Proponent shall restrict public access to the Coffee Creek barge landing and roads connected to the barge landing that it maintains. Access shall be restricted through means such as a gatehouse, as near the barge landing as possible, until such time the road network attached to the barge landing is decommissioned such that these roads not become public roads.	<b>Access Route Construction Management Plan</b> Section 7.0: Access Tie-in, Access Control, and Staging Area <b>Access Route Operational Management Plan</b> Section 3.1: Access Control <b>Wildlife Protection Plan</b> Section 4.2.4.1: Access Management	Construction / Operation	Access restricted through operation of the barge landings and through a gatehouse located approximately 2.8 km northeast of the north Stewart River barge landing. Access restricted through operation of the barge landings and through a gatehouse located approximately 2.8 km northeast of the north Stewart River barge landing.
2.1	The Proponent shall ensure that all new road sections do not become public roads and that all new road sections be decommissioned by the conclusion of project activities. New barge landings shall be obstructed in a manner to prevent unloading of vehicles by barge.	<b>Access Route Construction Management Plan</b> Section 9.13: Decommissioning and Reclamation <b>Access Route Operational Management Plan</b> Section 3.1: Access Control <b>Reclamation and Closure Plan</b> Section 7.8.2: NAR and On-site Access Road	Closure Construction / Operation / Closure Closure	
3	The Proponent shall not use the NAR, except for maintenance purposes, when caribou migrations are expected to intersect the NAR or caribou are persistently crossing the NAR over a period of three days. Normal road use shall not resume until caribou are considered to have cleared the road corridor.	<b>Access Route Operational Management Plan</b> Section 4.5: Interaction with Wildlife <b>Wildlife Protection Plan</b> Section 4.3.1: Species Specific Mitigation: Caribou	Construction / Operation / Closure	Phased approach to caribou mitigation: Response Level 3.
4	Snowbanks along the Northern Access Route shall be maintained at a level of less than 50 cm above the roadbed. Flowthrough breaks should be included at appropriate intervals and locations along the Northern Access Road.	<b>Wildlife Protection Plan</b> Section 4.1: Project Design; Section 4.2.4: Manage Road Operations <b>Access Route Operational Management Plan</b> Section 4.3: Snow Removal and Snow Management	Construction / Operation	Snowbanks will be managed and maintained to 0.5 m high where safe to do so and allowed by other design considerations and will include periodic breaks to allow wildlife to move across the road, spaced between 500 m and 1 km apart on alternating sides of the road. Snowbanks will be managed and maintained to 0.5 m high where safe to do so and allowed by other design considerations and will include periodic breaks to allow wildlife to move across the road, spaced between 500 m and 1 km apart on alternating sides of the road.
5	The proponent shall retain an individual qualified in caribou behavior who will, in consultation with Government of Yukon, implement design features to reduce the likelihood of entrapment within project infrastructure as well as design features that reduce noise, visual, and light stimuli in alpine and subalpine habitats of high importance to caribou that are within line of sight of the mine site's activities to assist in reducing stimuli that may cause an expansion of the zone of influence (ZOI) for the mine site.	<b>Noise Management Plan</b> Section 5.0: Environmental Protection Measures <b>Wildlife Protection Plan</b> Section 4.0: Wildlife Protection Measures Framework; Section 4.2: General Wildlife Protection Measures <b>Access Route Construction Management Plan</b> Section 7.0: Access Tie-in, Access Control, and Staging Area; Section 8.0: Borrow Sources	Construction / Operation / Closure	
6	Between May 1 and August 31, the minimum cruising altitude for project-related aircraft shall be 600m. This window will be extended as necessary based on seasonal caribou presence documented in the Wildlife Monitoring Plan and decision criteria in the Adaptive Management Plan.	<b>Wildlife Protection Plan</b> Section 4.2.5: Manage Aircraft Operations	Construction / Operation / Closure	

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Water and Aquatic Resources</b>				
7	In evaluating whether the non-degradation threshold for Coffee Creek is met, the Proponent shall be subject to performance evaluation criteria that incorporate a suitable method to determine if the Coffee Gold Project is the primary or most substantial cause of any exceedance of the non-degradation threshold. The Proponent's non-degradation thresholds shall be revised to require that the Project not be the primary or most substantial cause of any exceedance of a non-degradation threshold.	<b>Surface Water Quality and Aquatic Life Adaptive Management Plan</b> Section 2.3.2: Non-Degradation Water Quality Objectives - Coffee Creek and Yukon River	Construction / Operation / Closure	
8	The proponent shall revise water quality objectives prior to licensing, as necessary, dictated by the current relevant science and using the same level of protection assessed during the Screening. That is, use-protection objectives in Halfway, Latte and YT-24 creeks, and performance evaluations that reflect non-degradation objectives in Coffee Creek and the Yukon River downstream of Halfway, Latte and YT24 creeks.	<b>Water Management Plan</b> Section 1.4.2: Territorial Regulations	Construction / Operation / Closure	
9	Prior to licencing, the Proponent shall revise use-protection water quality objectives to ensure they incorporate the most recent toxicological information and guidance from CCME, Government of Canada, and BCMoE for the protection of freshwater aquatic life.	<b>Water Management Plan</b> Section 1.4.2: Territorial Regulations	Construction / Operation / Closure	
10	Reclamation and closure plans required under the Quartz Mining Act will include, at a minimum, the same use protection and non-degradation objectives as during operations. Water quality early warning triggers for reclamation and closure will be developed and applied for all watercourses as part of the Environmental Monitoring and Adaptive Management Plan.	<b>Reclamation and Closure Plan</b> Section 3.1.5: Water Quality Objectives <b>Reclamation and Closure Plan</b> Section 5.8.2: Contingency Planning and Adaptive Management Approach	Closure	
11	The Proponent shall develop water related adaptive management plans in accordance with Government of Yukon's 2021 guidance document, including any future revisions, "Guidelines for developing adaptive management plans in Yukon: water-related components of quartz mining projects".	<b>Environmental Monitoring and Adaptive Management Plan</b> Section 2.2: Adaptive Management Approach <b>Surface Water Quality and Aquatic Life Adaptive Management Plan</b>	Construction / Operation / Closure	
12	Ore shall not remain on the ROM ore pad at the end of operations, during scheduled or unscheduled closure, without prior confirmation of long-term attenuation capacity of the schist pad for the key COPIs, arsenic and uranium that has been reviewed and accepted by the relevant regulator.	<b>Reclamation and Closure Plan</b> Section 6.4.1: Heap Leach Facility and ROM Stockpile	Temporary Closure	
13	The proponent shall provide to the relevant regulator all iterative water balance and water quality model runs generated in support of future licensing applications based on project updates, additional water quality mitigation measures proposed during screening and licensing, and new information. During operations, the proponent shall provide results of monitoring data to allow comparison with predictions with relevant regulators and affected First Nations.	<b>Water Management Plan</b> Section 7.0: Reporting <b>Water Management Plan</b> Section 8.0: Annual Water Management Planning	Construction / Operation / Closure	
14	Prior to licensing, the proponent shall summarize the results of all test work completed for the development of the proposed bioreactor treatment system (EBR system), identify treatment performance objectives for the EBR, provide timelines to complete the remaining test work and develop the detailed design of the EBR system.	<b>Heap Leach and Process Facilities Plan</b> Section 4.5: Water Treatment of Heap Leach Solutions <b>Heap Leach and Process Facilities Plan</b> Appendix D: Coffee Mine Water Treatment Design for Permitting	Construction / Operation	
15	The overall timeline for development of the EBR system must meet the conditions evaluated during the Screening, such that detailed plans for the EBR are submitted, reviewed and accepted by the responsible regulator, and the EBR is operational prior to the HLF water balance reaching a threshold that requires discharge of treated excess water to Halfway Creek or the Latte Pit.	<b>Heap Leach and Process Facilities Plan</b> Section 4.4: Solution Management <b>Heap Leach and Process Facilities Plan</b> Section 4.5 Water Treatment of Heap Leach Solutions	Construction / Operation	
16	The proponent shall provide contingency plans contemplating scenarios where timelines or effluent quality objectives cannot be met prior to licensing. Contingency plans shall include a proof of concept, an estimated implementation time, and water quality early warning triggers which will be developed and applied for all affected watercourses as part of the Environmental Monitoring and Adaptive Management Plan.	<b>Water Management Plan</b> Section 4.3.8.1: Alpha Pond Performance Targets and Mitigation Measures <b>Water Management Plan</b> Appendix A: Coffee Gold Project Contingency Water Management Measures - Memo	Construction / Operation	
		<b>Heap Leach and Process Facilities Plan</b> Section 4.5.3.3 and Appendix E: Contingency Water Treatment Plan	Construction / Operation	
17	The proponent must define acceptable performance conditions for the Alpha Pond in terms of water quantity and quality for seepage from the Pond as part of the adaptive management for the Alpha Pond.	<b>Water Management Plan</b> Section 4.3.8.1: Alpha Pond Performance Targets and Mitigation Measures	Construction / Operation	
18	The proponent shall provide contingency plans contemplating scenarios where the management of surface effluent discharged from Alpha Pond fails to meet water quality objectives in Halfway Creek.	<b>Water Management Plan</b> Section 4.3.8.1: Alpha Pond Performance Targets and Mitigation Measures	Construction / Operation	

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Traditional Land Use and Heritage Resources</b>				
18.1	<p>The Noise Management Plan shall include the following measures to reduce the effects on traditional land uses:</p> <p>a) The plan shall include an objective to mitigate noise from a traditional land use perspective.</p> <p>b) In collaboration with affected First Nations, mitigations measures shall be identified that achieve the above objective. This may include reducing the timing and frequency of noise-related activities during critical times for traditional land use, such as fall harvesting.</p> <p>c) The Proponent shall develop a system for tracking, recording, and responding to complaints related to noise in collaboration with Environmental Health Services. Complaints are to be submitted to Environmental Health Services for recording purposes.</p> <p>d) The Proponent shall establish, in discussion with affected First Nations and communities, a means by which to communicate and inform individuals and communities who may be affected by Project-related noise in advance of any changes in sound levels that may occur, including when planned blasts are predicted to occur or deviations in the blasting plans.</p> <p>e) This aspect of the plan shall be adaptive and be based on inputs from the Noise Monitoring Plan and/or through the Socio-economic Management Plan undertaken in collaboration with affected First Nations.</p>	<p>a) <b>Noise Management Plan</b> Section 1.2: Scope and Objectives</p> <p>b) <b>Noise Management Plan</b> Section 5.0: Environmental Protection Measures</p> <p>c) <b>Noise Management Plan</b> Section 5.1.5: Noise Complaint Procedure</p> <p>d) <b>Noise Management Plan</b> Section 5.1.3: Blasting</p> <p>e) <b>Noise Management Plan</b> Section 5.2: Adaptive Management</p>	Construction / Operation / Closure	
19	<p>The Proponent shall facilitate and support traditional land use activities within the project area to the extent possible (that is, within the limits of safety and in areas under the control of the Proponent). Facilitation and support shall include, but not be limited to:</p> <p>a) Making all or a portion of the Coffee Creek camp available for traditional uses;</p> <p>b) Funding suitable infrastructure at the Coffee Creek camp for traditional uses;</p> <p>c) Funding and supporting culture camps for affected First Nations;</p> <p>d) Ensuring staff are provided with information regarding traditional land uses they may encounter.</p>	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Traditional Knowledge and Lands and Resource Use Management Strategy	Construction / Operation / Closure	
20	<p>The Proponent shall establish an elder-in-residence program in order to better:</p> <p>a) improve cross cultural awareness;</p> <p>b) increase First Nations physical presence at the mine site;</p> <p>c) improve First Nation knowledge of project development, and improve the Proponent's understanding of First Nation perspectives regarding the Project's development;</p> <p>d) ensure First Nation workers can access elders at the mine site.</p>	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Cultural Awareness and Diversity Management Strategy	Construction / Operation / Closure	
21	<p>The Proponent shall include the following in the scope of the Socio-Economic Management Plan:</p> <p>a) A management objective to continue to identify effects on each affected First Nation's Traditional Land Use in the Coffee Creek Area</p> <p>b) A commitment to carrying thorough effectiveness monitoring and adaptive management of measures intended to mitigate impacts from construction until post-closure;</p> <p>c) A commitment to ensure that all affected First Nations have an opportunity to participate in developing end land use objectives for the site that are consistent with traditional land use values for the area, including future uses.</p> <p>d) Development of a Terms of Reference with each affected First Nation for the methodology to undertake studies under the umbrella of the SEMP relating to effects to Traditional Land Use, including roles and responsibilities of Proponent and First Nation contributors; and</p> <p>e) Capacity funding to ensure the affected First Nations' full participation in the SEMP management and monitoring components that are relevant to the affected First Nations interests, if they so choose.</p>	<p>a) <b>Socio-economic Monitoring Plan</b> Section 6.0: Monitoring</p> <p>b) <b>Socio-economic Monitoring Plan</b> Section 6.0: Monitoring</p> <p>c) <b>Socio-economic Monitoring Plan</b> Section 1.6.2: Potentially Affected First Nations' Role and Responsibility</p> <p>d) <b>Socio-economic Monitoring Plan</b> Section 1.6.2: Potentially Affected First Nations' Role and Responsibility</p> <p>e) <b>Socio-economic Monitoring Plan</b> Section 1.6.2: Potentially Affected First Nations' Role and Responsibility</p>	Construction / Operation / Closure	

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Traditional Land Use and Heritage Resources</b>				
22	The Proponent shall fund efforts of affected First Nations (TH, WRFN, SFN and FNNND) to collect traditional knowledge with respect to the Coffee Creek area for the purposes of supporting a First Nation-developed culture program aimed at transmitting knowledge about the area to future generations.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Traditional Knowledge and Lands and Resource Use Management Strategy	Construction / Operation / Closure	
23	<p>The Proponent shall provide capacity funding for each affected First Nation to retain Indigenous Project Monitors, if they so choose, which shall have the following functions in relation to reducing effects to traditional land use;</p> <p>a) To identify, document and develop mechanisms to support resolution of potential conflict between mining activities and First Nation cultural values and practices in the Coffee Creek area.</p> <p>b) The monitors shall be involved in the collection of information on matters on-site related to harvestable resources in the project area and surrounding landscape and ways in the accessibility to those resources or quality of experience in harvesting those resources may be diminished.</p> <p>c) The monitors shall be on-site during mining activities but also be given means for community-based outreach work. This may include but not be limited to travel to First Nation primary communities and/or accommodating First Nation elders and land users at the site.</p> <p>d) The monitors shall also be involved in data collection for other culturally important land uses. Data collection shall include but not be limited to land user perceptions, regarding compatibility of traditional activities and adjacent industrial activities (e.g. user tolerance for noise, visual scarring, or other “sense of place” determinants).</p> <p>e) The Monitors shall be provided authority and resources to scope traditional knowledge and traditional use studies aimed at documenting mining / land use conflicts (actual or potential), and ways in which those conflicts could be mitigated. For greater clarity, this condition envisions that the Monitor may, from time to time, employ supporting staff of their choosing to support special projects.</p> <p>f) Funding for the Monitors shall be sufficient to enable the above functions, if so desired by each affected First Nation. The Indigenous Project Monitors act as a liaison between the affected First Nations and the Proponent and are a mechanism to implement the adaptive management framework outlined in the SEMP to address effects to traditional land uses. The Indigenous Project Monitors may act in conjunction with, or replace, the Environmental Monitors as committed to by the Proponent, depending on the needs and preferences of each affected First Nation. The Indigenous Project Monitors are intended to be independent of the Proponent and represent the interests of the affected First Nations.</p>	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Traditional Knowledge and Lands and Resource Use Management Strategy	Construction / Operation / Closure	
24	The proponent shall only landfill inert substances at the project site. The Proponent shall work with affected First Nations and regulatory agencies to develop an Approved Landfill Materials list and mechanism for establishing suitably low leachability risk for proposed landfill materials.	<b>Waste and Hazardous Materials Management Plan</b> Section 1.3: Incorporation of Traditional Knowledge and Consultation Feedback	Construction / Operation / Closure	
<b>Health and Safety</b>				
25	The Proponent shall develop mandatory, regular harassment prevention training, in consultation with a qualified expert, to be delivered to all the Proponent’s employees, contractors and consultants working on the Project. The qualified expert must also be proficient in cross-cultural awareness training.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	
26	The Proponent shall ensure that human resource staff complete training to enable them to effectively support employees who disclose workplace harassment. In order to support reporting of sexual harassment and assault, human resource staff shall provide all new staff members with information about ways in which they can record and provide evidence of harassment or bullying, what happens after they make a disclosure, and how they will be protected from reprisals.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	
27	The Proponent shall ensure that all HR staff complete training to effectively support employees who disclose sexualized or gender-based violence, as well as harassment and discrimination against Indigenous people in their workplace or at home. It is recommended that a counsellor be available on site for support through this as well.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Health and Safety</b>				
28	The Proponent shall create a mentor program for Yukon First Nation employees to achieve three goals: a) ensure that First Nation women have access to a mentor or supervisor who has the authority to and regularly checks in to address any negative experiences related to the male-dominated work environment, and who pays special attention to potential cases of abuse; b) develop a formal feedback process to ensure that enquiries are regularly made of First Nation employees to ensure that they are able to voice their concerns and address any negative experiences; and c) involve TH, SFN, FNNND and WRFN in further developing the program to ensure that it meets the needs of First Nation employees.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy	Construction / Operation / Closure	
29	The Proponent shall, in consultation with a qualified expert and with TH, SFN, FNNND and WRFN, develop gender appropriate and gender- and sexuality-specific policies and processes that promote a safe, respectful, and inclusive environment for women and gender and sexual minorities.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	
30	The Proponent shall ensure that HR staff administer confidential exit surveys with explicit questions about whether workplace harassment occurred, if disclosures were made, and what supports were provided. The proponent shall use this information to track trends and inform hiring, policy, and other initiatives at the mine site, and shall provide an annual report to Health and Social Services and the Women's Directorate detailing the Proponent's efforts to prevent workplace harassment as well as statistics on reported incidences of harassment, disclosures, etc.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	
31	The Proponent shall ensure that the on-site First Aid Technician or Emergency Medical Technician is trained in Mental Health First Aid and/or has formal mental health training to provide short-term or crisis support at the mine site and has referrals to other mental wellness supports or navigation to other systems.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy	Construction / Operation / Closure	
32	The Proponent shall ensure that on-site employees have the ability to utilize the Employee Assistance Plan (EAP) services available (i.e., make available a private phone line or Internet connection so employees can discreetly reach EAP services)	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy	Construction / Operation / Closure	
33	The Proponent shall retain professional services in the appropriate field to help their on-site mental health first aid staff develop the methods and tools that are appropriate to provide support to perpetrators of violence and harassment to help end cycles of abuse.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy	Construction / Operation / Closure	
34	The Proponent shall consider gender equity/diversity in hiring processes.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	
35	To address and mitigate impacts to employees who are or become victims of domestic abuse, the Proponent must create a policy that: a) outlines clear procedures for the workplace to deal with affected employees and provide appropriate resources and support; b) plans for and addresses the safety concerns of the affected employees while at work to ensure that all workers are safe from threats of domestic violence; and c) includes a personal safety plan for employees suffering from domestic violence.	<b>Code of Conduct</b>		Additional detail will not be provided
36	The Proponent shall provide access to the EAP for the eligible dependents of employees and inform all employees of this.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy <b>HR Policy</b>	Construction / Operation / Closure	

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Health and Safety</b>				
37	The Proponent shall develop clear standards for behaviour at work and codes of conduct against sexual harassment and gender-based violence on the job site and in the broader community, including standards/codes of conduct in relation to the sex trade, and shall distribute education and awareness campaign materials on gender-based violence. Refer to Unlocking Opportunities for Women and Business: Actions and Strategies for Oil, Gas and Mining Companies Tool Suite 4: Addressing Gender Based Violence in the Workforce (2018) for information and resources.	<b>Code of Conduct</b>		Additional detail will not be provided
38	The Proponent's Noise Management and Monitoring Plans submitted at licensing should incorporate all recommendations outlined in Appendix 10-A Noise Intermediate Component Analysis Report 2017, s.43.3. In addition, the Proponent must implement the following measures based on industry best-practice guidelines:  a) Workers' living quarters shall be designed to limit noise, with mitigating features such as high-quality soundproofing for windows and seals on doors.  b) Physical barriers shall be used to maximize shielding and reduce noise transmission. Physical barriers shall be of an appropriate height and thickness to break the line-of-sight between the project related noise sources and the dormitory and other sensitive receptors at the permanent camp, to reduce noise levels to lower than 30 dBA (Leq) indoors to be protective of sleep.  c) Optimization of operations shall include notifying workers of the schedule for loud procedures or particularly annoying noise events. Periods of respite shall be provided in the case of unavoidable maximum noise level events.	a) <b>Noise Management Plan</b> Section 5.1.4: Design of Permanent Camp  b) <b>Noise Management Plan</b> Section 5.1.1: Heavy Equipment  c) <b>Noise Management Plan</b> Section 5.1.3: Blasting	Construction / Operation / Closure	
39	If thresholds under YAAQS are being approached at the sites of the monitoring stations, or where CACs have exceeded thresholds, activities involving sources of emission be reduced or have additional emission mitigations applied. In this way, air quality and adaptive management may reduce or prevent further increases in CACs, and reduce the risk to employees during non-working hours. The Proponent shall notify workers traversing areas that have elevated outdoor concentrations and require them to use appropriate PPE. Off-duty workers will be advised to reduce exposure by remaining indoors to the extent possible and closing windows in camp residences at times of peak emissions.	<b>Air Quality and Greenhouse Gas Monitoring Plan</b>	Construction / Operation / Closure	Emission sources determined to cause excursions of or approaches to CAC thresholds will be reduced, curtailed and/or have additional emission mitigations applied.
40	The Proponent shall incorporate an adaptive management plan in collaboration with First Nations and regulators, that establishes concrete actions for approaching and exceeding thresholds. The following adaptive management actions and corresponding triggering thresholds are to be used until such time as a detailed project specific approach is jointly developed to operationally target the reduction of CAC's and particulates and management of air quality at, and in proximity to, the Project site.	<b>Air Quality and Greenhouse Gas Monitoring Plan</b>	Construction / Operation / Closure	
41	The Proponent shall ensure that impacts on employee health (both on and off-duty, on-site) are considered in assessing the need for adaptive measures. The Proponent shall ensure that ambient air quality in camp buildings meets indoor air quality guidelines through various means including the use of adequate ventilation and air filtration systems, effective insulation, seals on windows and doors, bans on vehicles idling in the immediate vicinity. Indoor air monitoring will occur to ensure that emissions are not accumulating in indoor environments.	<b>Air Quality and Greenhouse Gas Management Plan</b> Section 7.1.4: Design of Camp Accommodations  <b>Health and Safety Program</b>	Construction / Operation / Closure	
<b>Community and Economics</b>				
42	The Proponent shall maintain a transition fund, as a component of the Workforce Transition Strategy, of an amount sufficient to ensure, in the event of unscheduled closure:  a) the funding of programs and other financial commitments outlined in the Socio-Economic Monitoring Program for a period of 12 months, b) maintenance of the Employee Assistance Program for a minimum of 6 months.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Local Employment and Procurement Management Strategy	Construction / Operation / Closure	
43	The Proponent will promptly notify Health and Social Services of unscheduled closures, the supports and services the Proponent has in place for impacted employees and their families, and any forecasted implications beyond the scope of what the Proponent can address. Health and Social Services will assess the need to coordinate or deploy health and social resources to support impacted communities, in alignment with mandate(s) and scope.	<b>Reclamation and Closure Plan</b> Section 6.7.1: Management of Socio-economic Aspects of Temporary Closure	Temporary Closure	

Decision Document Mitigation Measures				
Mitigation Number	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Community and Economics</b>				
44	The Proponent shall provide staff with access to online information and resources for money management and budgeting.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Local Employment and Procurement Management Strategy <b>EAP</b>	Construction / Operation / Closure	
45	Recruitment for care and maintenance positions shall follow the same process used for hiring mine employees, prioritizing local hire, with preference given to former qualified mine employees.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Local Employment and Procurement Management Strategy	Construction / Operation / Closure	
46	Security requirements shall take into consideration the potential for early unscheduled closure and the need for care and maintenance requirements to maintain environmental safeguards prior to decommissioning.	<b>Reclamation and Closure Plan</b> Section 9.0: Reclamation and Closure Liability	Closure	
47	The Proponent shall match the current Government of Yukon incentive for secondary suite renovation (\$10,000). Residents in Dawson and its environs will be eligible, with the number of Proponent grants capped at 30 approved and matched incentives.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Infrastructure and Services Management Strategy	Construction / Operation / Closure	
48	The Government of Yukon shall work with the City of Dawson and Tr'ondëk Hwëch'in Government to identify and make available suitable lands for housing development.	<b>Yukon Government</b>		Additional detail will not be provided

### Decision Document Monitoring Requirements

Mitigation Letter	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Wildlife and Wildlife Habitat</b>				
A	<p>The Government of Yukon shall implement a monitoring program for linear development (i.e. roads) and surface disturbance (i.e. mined areas) in the White Gold area in relation to effects to moose and other wildlife (i.e. caribou). The program shall be scoped with the following considerations:</p> <ol style="list-style-type: none"> <li>1. Monitoring shall include past developments and disturbances as well as reclamation efforts.</li> <li>2. Monitoring shall seek to consolidate the quantity and quality of data submitted by Proponents into a consistent format for intended use in this program.</li> <li>3. The program shall aspire to define significant cumulative linear and surface disturbance thresholds in the White Gold area for moose and caribou prior to issuance of any new Quartz Mining Land Use approvals, or expansion by more than 5% of the disturbance area for existing approvals.</li> <li>4. The program shall be developed collaboratively with First Nations with traditional territory overlapping the area. First Nation participation in the monitoring program shall be funded by Government of Yukon.</li> <li>5. The program shall be guided by a Terms of Reference (ToR), developed by consensus with Government of Yukon and First Nation government representatives. The ToR shall define temporal and spatial scopes, roles and responsibilities, and overall mandate.</li> <li>6. Monitoring shall reflect and complement priorities identified in and work undertaken for the Dawson Land Use Plan.</li> </ol>	<b>Yukon Government</b>		
B	<p>The Government of Yukon shall implement monitoring of the overall abundance of moose in the Dawson Gold Fields MMU using a variety of methods that allow for tracking of population abundance and spatial distribution, such as aerial surveys and tracking of licensed harvest data, and which are performed consistently throughout the Project's lifecycle. Surveys should be conducted in early winter, commencing prior to construction, with subsequent surveys at five-year intervals, where possible, and include involvement of monitors from affected First Nations. The subsequent effects monitoring shall be informed by survey results and annual monitoring of all licensed moose harvest in game management subzones adjacent to, and intersecting the Northern Access Route.</p>	<b>Yukon Government</b>		
C	<p>The Proponent shall, in coordination and consultation with Government of Yukon, undertake effects monitoring of moose populations for areas of direct overlap with mine infrastructure, including the Northern Access Route, and for areas determined to be in the ZOI for moose within the Dawson Gold Fields MMU, Lower Stewart MMU and White Gold MMU.</p>			Newmont is currently in negotiations with Yukon Government regarding the effects monitoring program for wildlife. Program details will be provided when finalized as the negotiations are ongoing.
D	<p>Within 5 years of commencing operations, Government of Yukon shall conduct regional surveys, focusing on the interactions between the Fortymile and Klaza caribou herds and the Project. These surveys shall be conducted for the purposes of understanding the direct effects of the Project as well as the effects of the Project's induced development on herd movements and populations, establishing adaptive management thresholds and determining if additional measures are required should the evidence indicate there are negative project-related effects on caribou, either directly or indirectly.</p>	<b>Yukon Government</b>		

### Decision Document Monitoring Requirements

Mitigation Letter	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Water and Aquatic Resources</b>				
E	The proponent shall develop and implement a plan to monitor seepage quality downgradient of the ROM ore pad to serve enable detection of any arsenic or uranium breakthrough from the pad to the underlying groundwater. Monitoring data shall be compared to triggers developed under the proponent’s Environmental Monitoring and Adaptive Management Plan.	<b>Groundwater Monitoring Plan</b> Section 2.3.5: Seepage Monitoring	Construction Operations Closure	GW Monitoring Plan includes a visual survey once a month during the non-frozen season to confirm the presence of persistent seepage around facility perimeters (ROM).
		<b>Surface Water Quality and Aquatic Life Adaptive Management Plan</b> Section 4.5.3: Indicators, Performance Thresholds and Responses		Latte Creek thresholds tied to completing an evaluation of the ROM stockpile pad seepage.
F	<p>The proponent’s Environmental Monitoring and Adaptive Management Plan (EMAMP) plan shall include:</p> <ol style="list-style-type: none"> <li>1. Water management goals defined as use-protection in Halfway, Latte and YT-24 creeks, and non-degradation in Coffee Creek and the Yukon River downstream of Halfway, Latte and YT-24 creeks;</li> <li>2. For the purpose of non-degradation performance evaluation for the Yukon River extend monitoring spatially to the Yukon River downstream of Halfway, YT-24 and Coffee creeks, in areas directly affected by each creek’s plume. This is in addition to water quality for the purpose of non-degradation performance evaluation in the fully mixed areas of the Yukon River downstream of Coffee Creek.</li> <li>3. The rationale for the scope of the monitoring programs;</li> <li>4. Descriptions of how the Project effects assessments informed the development of the monitoring programs; and</li> <li>5. Descriptions and rationales for which programs require an adaptive management component.</li> <li>6. Include AMP events for Halfway Creek closer to the site than HC1.0, which is located in the lower reaches of Halfway Creek upstream of the Yukon River, where use-protection WQOs can be proposed;</li> <li>7. Include annual assessments to confirm non-degradation of surface water quality in Coffee Creek downstream of Latte Creek and the Yukon River downstream of Halfway, Latte and YT-24 creeks; such assessments will include comparison to a reference watershed;</li> <li>8. Thresholds for arsenic and uranium levels in downgradient seepage of the ROM ore pad and triggers for adaptive measures</li> <li>9. And shall develop Adaptive Management initiatives to address areas of uncertainty relevant to:               <ol style="list-style-type: none"> <li>i. Performance of the Alpha Rock Drain;</li> <li>ii. Performance of the Alpha Pond(s) (water quality and seepage quantity and quality);</li> <li>iii. Performance of the bioreactor treatment system for HLF seepage (EBR system); and</li> <li>iv. NORM/TENORM for long-term storage of uranium-rich materials (EBR materials)</li> </ol> </li> <li>10. Define stabilization of water quality in the Alpha Pond (during the Closure phase, as a pre-condition for decommissioning of the Alpha Pond in Post-Closure) as:               <ol style="list-style-type: none"> <li>i. No notable upward trends in the COPIs</li> <li>ii. A sustained reduction in inter-annual variability in COPI concentrations from Operations phase conditions</li> <li>iii. Discharge concentrations for all COPIs are consistently at levels that allow WQOs to be achieved in Halfway Creek.</li> </ol> </li> </ol>	1) <b>Water Management Plan</b> Section 1.4.2: Territorial Regulations	Construction Operations Closure	
		1) <b>Surface Water Quality and Aquatic Life Adaptive Management Plan</b> Section 1.2: Adaptive Management Plan Objectives		
		2) <b>Surface Water Quality Monitoring Plan</b> Section 2.0: Monitoring Locations and Frequencies		
		3) <b>Environmental Monitoring and Adaptive Management Plan</b>		
		4) <b>Environmental Monitoring and Adaptive Management Plan</b> Section 2.0: Environmental Monitoring Approach		
		5) <b>Environmental Monitoring and Adaptive Management Plan</b> Section 2.2: Adaptive Management Approach		
		6) <b>Water Management Plan</b> Section 4.3.8.1: Alpha Pond Performance Targets and Mitigation Measures		
		7) <b>Surface Water Quality and Aquatic Life Adaptive Management Plan</b>		
		8) <b>Surface Water Quality and Aquatic Life Adaptive Management Plan</b> Section 4.5.3: Indicators, Performance Thresholds and Responses		
		9i) <b>Water Management Plan</b> Section 4.3.7: Alpha Rock Drain		
9ii) <b>Water Management Plan</b> Section 4.3.8.1: Alpha Pond Performance Targets and Mitigation Measures				
9iii) <b>Heap Leach and Process Facilities Plan</b> Section 4.5.3.1: Process Descriptions				
9iii) <b>Heap Leach and Process Facilities Plan</b> Section 4.5.3.3: Contingency Water Treatment Plan				
9iv) <b>Heap Leach and Process Facilities Plan</b> , Section 4.5.3.1 Process Descriptions				
10) <b>Reclamation and Closure Plan</b> Section 7.7: Site Water Management Infrastructure				
	Will not include a comparison to a reference watershed.			
	Latte Creek thresholds tied to doing an evaluation of the ROM stockpile pad seepage.			

### Decision Document Monitoring Requirements

Mitigation Letter	Proposed Mitigation	Management Plan	Project Phases	Notes
<b>Health and Safety</b>				
G	The Proponent shall include the following parties in the development of a monitoring program to ensure that the Project's effects on personal safety are adequately monitored: Government of Yukon, the Yukon Status of Women Council, and the Yukon Aboriginal Women's Council.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Health and Well-Being Management Strategy		
H	To position Government of Yukon with adequate information to act on recommendations and preparation of services within communities, data collected in the monitoring program must be shared and used by parties in the development of response and resources to address effects as they occur. To support that, information relating to the amount and percentage of workforce that is transient to the Yukon will be required. The Proponent shall provide a quarterly report detailing the numbers and percentage of workforce that is transient (i.e. fly-in/fly-out and non-resident to the Yukon) to the Government of Yukon.	<b>Socio-economic Monitoring Plan</b> Section 6.0: Monitoring <b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Infrastructure and Services Management Strategy and Community Health and Well-Being Management Strategy		
I	<p>The Proponent shall develop an Air Quality and Dust Management and Monitoring Plan which incorporates the following:</p> <ol style="list-style-type: none"> <li>1. Long-term Monitoring stations <ul style="list-style-type: none"> <li>o Long-term monitoring stations will be operated throughout the phases of the Project.</li> </ul> <p>The long-term monitoring stations:</p> <ul style="list-style-type: none"> <li>o Shall be placed at the permanent camp facilities, mine dry and office complex); the truck shop/warehouse; and at the Yukon River foreshore, east of the existing Coffee Creek camp. These are sites of predicted exceedances and worker presence (including off-duty workers) and likely exposure. The aim of establishing these stations is to redress the insufficient number of monitoring stations suggested by the Proponent for the mine site area.</li> <li>o Employ continuous monitoring, as opposed to the periodic and volumetric monitoring currently proposed.</li> </ul> </li> <li>2. Apply the use of MicroPulse LiDAR technology to monitor and track dust and particulates throughout the Project and adjacent areas.</li> <li>3. At the commencement of Project Operations, Government of Yukon (YG) shall develop a repository for the monitoring data collected by the Proponent under the Air Quality and Dust Management Plan, and which it will provide on a timely (quarterly) basis. This repository will be accessible to First Nations, industry parties, regulators and the general public. YG shall review repository data and ensure compliance with the Adaptive Management Measures outlined under Mitigations 40 and 41.</li> <li>4. A system for implementing additional monitoring and/or mitigation measures in the event of: <ul style="list-style-type: none"> <li>o Changes to overall air quality, particularly increases in particulates, dust and contaminant concentrations approaching thresholds;</li> <li>o Complaints</li> <li>o Such a plan is required for submission during the Quartz Mining Licence phase for the Project.</li> </ul> </li> <li>5. A system for tracking, recording and responding to complaints related to air quality in collaboration with Environmental Health Services. Complaints are to be submitted to Environmental Health Services for recording purposes.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Air Quality and Greenhouse Gas Monitoring Plan</b> Section 2.0: Monitoring Locations, Section 3.0: Monitoring Methodology</li> <li>2. <b>Air Quality and Greenhouse Gas Monitoring Plan</b> Section 4.0 Data Analysis and Interpretation; Yukon Government</li> <li>3. <b>Air Quality and Greenhouse Gas Monitoring Plan</b> Section 6.0 Reporting and Annual Review</li> <li>4. <b>Newmont Coffee Grievance Mechanism</b></li> <li>5. <b>Newmont Coffee Grievance Mechanism</b></li> </ol>	Construction Operations Closure	<ol style="list-style-type: none"> <li>1. Continuous monitoring for PM10, PM2.5, NOx and SO2 and discrete monitoring for dustfall with metals analysis is proposed for the mine dry and office complex. Passive monitoring for dustfall fall with metals analysis and NOx and SO2 is proposed for the Yukon River Foreshore. The Yukon river foreshore location is only inhabited for part of the year and will likely have unreliable power, therefore, passive monitoring is proposed for this site. The truck shop/warehouse and the existing Coffee Creek Camp are not expected to produced statistically different results than the mine dry and office complex and may have reliable power and/or equipment interference effects.</li> <li>2. MicroPulse LiDAR is not a currently available and accepted practice.</li> </ol>
<b>Community and Economics</b>				
J	A working group shall be formed consisting of Government of Yukon, City of Dawson, Tr'ondëk Hwëch'in Government and the Proponent. This working group will monitor project-induced population growth and housing demand across project life. Project monitoring must involve the collection of data on the population of Dawson, rental and homeownership rates, availability of rental and market housing and associated prices. The Proponent shall provide an annual report on workforce numbers and place of worker residence, made publicly available, to establish clear reporting of immigration trends.	<b>Socio-economic Monitoring Plan</b> Appendix B: SEMP Management Strategies - Community Infrastructure and Services Management Strategy		

Proponent Commitments

FSR Plan	Mitigation Name	Reference	Proponent Committed Mitigation	Management Plan	Commitment Incorporated	Section Location	Notes
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	PP Table 32-2 (YOR 2017-0211-027-1)	Goldcorp will develop and implement a Wildlife Protection Plan that contains the following commitments:  • Time construction activities to avoid sensitive habitats during sensitive times. If construction activities must occur during a sensitive period, implement additional monitoring and mitigation.	WPP	Yes	WPP Section 4.4: Procedures During Construction Phase	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Time vegetation clearing and grubbing to occur outside the migratory birds nesting period. If clearing and grubbing must occur during the nest period (May 1 to August 15), conduct a breeding bird nest survey prior to clearing. If nests are discovered with eggs and/or chicks, avoid these areas and establish a no-disturbance buffer around the nest until the young birds have left the nest.	WPP	Yes	WPP Section 4.4: Procedures During Construction Phase	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Mark wildlife habitat features and sensitive habitats as sensitive on all construction drawings and establish appropriate buffers.	WPP	Yes	WPP Section 4.4: Procedures During Construction Phase	Project footprint boundaries and known wildlife habitat features or sensitive areas will be clearly marked on site plans and in the field by a qualified environmental professional.
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Reclaim riparian vegetation in areas affected by barge landing construction (restore shoreline habitat).	RCP	Yes	RCP Section 7.8.2: NAR and On-site Access Road	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Take special care so that road construction and operation through the Thinhorn Sheep Ballarat occurrence area is a minimal hindrance to Sheep crossing the road. Specifically:  o Avoid tall, steep road banks. o Conduct snow clearing and piling in a way that will minimize hindrance to Sheep crossing the road.	WPP	Yes	WPP Section 4.3.3:Thinhorn Sheep	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Ensure known cliff-nesting raptor nests remain intact and are not damaged by construction activities. If construction activities overlap the nesting period for these species, check raptor nests within 1 km of the road for occupancy and develop a construction management plan for working near occupied nests.	WPP	Yes	WPP Section 4.3.6: Birds and Bird Nests	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• When disturbance in the breeding bird season is required for the Project, and near specific nest sites identified during baseline studies, conduct additional mitigation to protect nests as follows:  o Conduct pre-clearing nest surveys. o Identify and protect active nests. Establish no disturbance setbacks around active nests. o Protect nests of certain species such as raptor nest sites identified during baseline surveys year-round, regardless of if they are actively being used. Provide protocols that include timing of breeding season, setback distances around active nests, and methods for conducting pre-clearing nest surveys.	WPP	Yes	WPP Section 4.3.6: Birds and Bird Nests; Section 4.4: Procedures During Construction Phase	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Conduct pre-clearing surveys for bat roosts in habitats with high potential to support bat roosts prior to the commencement of construction activities. Leave any identified bat roosts structurally intact and establish a no-disturbance buffer around active roosts.	WPP	Yes	WPP Section 4.3.5: Bats	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		• Establish no-disturbance buffers around identified wildlife habitat features (e.g., mineral licks, dens, and bat roosts) during sensitive periods. Consider project activities, including blasting, for disturbance to nearby wildlife features. If disturbance within the no-disturbance buffer is unavoidable, develop site-specific protection measures in consultation with authorities.	WPP	Yes	WPP Section 4.4: Procedures During Construction Phase	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	• Time road construction to avoid activity near the Yukon River cliffs during the lambing season.	WPP	Yes	WPP Section 4.3.3: Thinhorn Sheep		

Proponent Commitments							
FSR Plan	Mitigation Name	Reference	Proponent Committed Mitigation	Management Plan	Commitment Incorporated	Section Location	Notes
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	PP Table 32-2 (YOR 2017-0211-027-1)	<ul style="list-style-type: none"> <li>Phase an approach to mitigation to minimize disturbance to migrating caribou, during the Fortymile Caribou Herd spring and fall migration seasons. Implement temporary road controls when large groups of caribou are migrating through the area. Depending on the size of the movements, speed restriction and convoying traffic may be sufficient to allow for continued caribou movement.</li> </ul>	WPP	Yes	WPP Section 4.3.1.1: Fortymile Caribou	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>Implement wildlife protocols to reduce the potential for wildlife-human interactions in the Project footprint.</li> </ul>	WPP	Yes	WPP Section 4.2.2: Reduce Human-Wildlife Encounter Risks	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>Prohibit hunting of wildlife at all times for all employees and contractors while present on site (both on and off-shift).</li> </ul>	WPP	Yes	WPP Section 4.2: General Wildlife Protection Measures	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>Prohibit feeding and harassment of wildlife.</li> </ul>	WPP	Yes	WPP Section 4.2: General Wildlife Protection Measures	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>Post warning signs in areas of frequent wildlife encounters on a seasonal basis or as otherwise required.</li> </ul>	WPP	Yes	WPP Section 4.2.2: Reduce Human-Wildlife Encounter Risks	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>Ensure employees report wildlife sightings along the road and near Project facilities.</li> </ul>	WPP	Yes	WPP Section 4.2.1: Project Personnel Wildlife Awareness Orientation	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>In the event of bear encounters, employ several types of bear deterrents, including bear spray and air horns. Use firearms only as a last resort in the event of a bear encounter when all other methods of bear deterrents have failed. If animals are killed in defense of life or property, consult Yukon Conservation Services regarding disposal.</li> </ul>	WPP	Yes	WPP Section 4.2.2: Reduce Human-Wildlife Encounter Risks	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>Right-of-way will be given to Wildlife along all Project roads: <ul style="list-style-type: none"> <li>Vehicle operators will watch for wildlife near roads and take all reasonable actions to avoid collisions with wildlife.</li> <li>Traffic will stop as far back as safely possible if wildlife is observed on the road. If after five minutes the animals have not moved off the road, the vehicle may proceed slowly and cautiously (less than 20 km/h).</li> <li>Road signage, both permanent and temporary, will be erected to inform users regarding seasonal wildlife issues along the NAR and Mine Site roads as necessary.</li> <li>Speed limits will be posted along Project roads, including additional speed restrictions for the protection of wildlife along specific sections of road and/or during seasons when wildlife is expected to regularly interact with the road.</li> <li>No-stopping areas will be designated in sensitive wildlife areas as determined by project monitoring and project biologists; no-stopping areas will have signs posted.</li> <li>Drivers will communicate wildlife observations along the road via radio communications to verify other drivers are informed of potential hazards.</li> <li>Implement temporary road closures and/or traffic restrictions (i.e., convoying traffic) as required to minimize effects to wildlife during sensitive periods including moose congregation areas in the post-rut and early winter, and caribou migration.</li> <li>Maintain a wildlife sighting log by on-site personnel through all Project phases. Drivers will be required to document all wildlife observations and wildlife logs will be collected by on a weekly basis.</li> </ul> </li> </ul>	WPP	Yes	WPP Section 4.2: General Wildlife Protection Measure; Section 4.2.4: Manage Road Operations	

Proponent Commitments							
FSR Plan	Mitigation Name	Reference	Proponent Committed Mitigation	Management Plan	Commitment Incorporated	Section Location	Notes
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	PP Table 32-2 (YOR 2017-0211-027-1)	<ul style="list-style-type: none"> <li>• Provide project personnel wildlife awareness orientation to all workers on the site through all phases of the Project. The objectives of the wildlife awareness orientation with respect to wildlife and wildlife habitat are:                             <ul style="list-style-type: none"> <li>o Provide workers with knowledge of why interactions with wildlife are important to manage, and an understanding of the course of action to be taken in a variety of circumstances.</li> <li>o Emphasize the role of adaptive management in realizing effective mitigation for wildlife and the workers' role in recording their observations on the wildlife sighting log, or as part of the monitoring programs described in the Wildlife Protection Plan.</li> <li>o Keep records to document completion of the orientation by all site personnel.</li> </ul> </li> </ul>	WPP	Yes	WPP Section 4.2.1: Project Personnel Wildlife Awareness Orientation	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Manage aircraft operations, including both fixed-wing aircraft and helicopters, to limit the potential effects to wildlife. Subject to safety considerations and pilot discretion:</li> </ul>	WPP	Yes	WPP Section 4.2.5: Manage Aircraft Operations	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• All Project-related aircraft will maintain a minimum cruising altitude of 300 m above ground level; between May 1 and June 31 the minimum cruising altitude will be increased to 600 m above ground level when Caribou have been identified in the area (for the protection of calving Caribou).</li> </ul>	WPP	Yes	WPP Section 4.2.5: Manage Aircraft Operations	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Avoid hovering or circling over wildlife.</li> </ul>	WPP	Yes	WPP Section 4.2.5: Manage Aircraft Operations	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• For the protection of Thinhorn Sheep, aircraft will maintain a cruising altitude of 500 m above ground when flying over the south-facing slopes along the Yukon River or maintain a horizontal distance of at least 1,000 m from these slopes.</li> </ul>	WPP	Yes	WPP Section 4.2.5: Manage Aircraft Operations	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Low-level flights and/or flights along the Yukon River during wildlife surveys will be conducted, as directed by Project biologists in accordance with wildlife research permits.</li> </ul>	WPP	Yes	WPP Section 4.2.5: Manage Aircraft Operations	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Fence Heap Leach Facility events ponds during Operation to prevent access by wildlife.</li> </ul>	WPP	Yes	WPP Section 4.2.6: Prevent Wildlife Entrapment	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Where safe to do so, place boulders to create berms to prevent access to the edges of the Open Pits, where they could present a hazard to wildlife that is not readily visible to approaching wildlife.</li> </ul>	WPP	Yes	WPP Section 4.2.6: Prevent Wildlife Entrapment	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Conduct periodic audits to assess the effectiveness of waste management practices and regular surveillance of Project facilities and waste disposal sites will ensure that wildlife control measures are effective.</li> </ul>	WPP	Yes	WPP Section 4.2.2: Reduce Human-Wildlife Encounter Risks	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Conduct immediate follow-up if any observation of bears or other wildlife acting defensively, showing signs of human habituation, or acting aggressively. If specific wildlife becomes a concern, contact Yukon Conservation Officer Services for advice on appropriate actions.</li> </ul>	WPP	Yes	WPP Section 4.2.2: Reduce Human-Wildlife Encounter Risks	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Where practical, and not a risk to human safety, implement a Stop Work policy when wildlife in the area may be endangered (i.e., risk of physical injury or death) by the work being conducted.</li> </ul>	WPP	Yes	WPP Section 4.4: Procedures During Construction Phase	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan		<ul style="list-style-type: none"> <li>• Conduct wildlife monitoring in accordance with the requirements of the Wildlife Protection Plan.</li> </ul>	EMAMP	Yes	EMAMP - Appendix G: Wildlife Monitoring Plan Section 2.3: Links to Other Disciplines	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	SIR2-10.1-R2-66 (YOR 2017-0211-411-1)	To prevent bird exposure to contaminated water in the Events Ponds, scare cannons will be employed as needed to deter birds from using the Ponds. The Environmental Department will monitor the Events Ponds regularly to ensure that deterrence measures are effective in preventing bird use of the Ponds and are not creating additional environmental management issues. If monitoring determines that deterrence measures are not effective, alternate methods of bird deterrence will be used.	WPP	Yes	WPP Section 4.3.6: Birds and Bird Nests	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	SIR1-11.1-R231 (YOR 2017-0211-326-2)	• Mine contact water will be monitored for metals throughout the life of the mine. Results will be used to assess possible toxicity risk to wildlife and to develop adaptive management measures to further reduce the likelihood of exposure to or uptake of contaminants.	EMAMP	Yes	EMAMP - Appendix B: SWQ Monitoring Plan Section 3.0: Monitoring Methodology	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	SIR1-11.1-R237 (YOR 2017-0211-326-2)	• Should the Klaza caribou use the late-winter habitat near the Mine Site, then mitigation universal to all caribou will apply.	WPP	Yes	WPP Section 4.3.1.2: Klaza Caribou	

Proponent Commitments							
FSR Plan	Mitigation Name	Reference	Proponent Committed Mitigation	Management Plan	Commitment Incorporated	Section Location	Notes
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	SIR1-11.6-R244 (YOR 2017-0211-326-2)	<ul style="list-style-type: none"> <li>• Following measures will be implemented to mitigate effects to wildlife frequenting mineral licks:               <ul style="list-style-type: none"> <li>o Avoid seasonal windows of peak ungulate activity at the mineral lick for road construction and road maintenance within a 1-km buffer.</li> <li>o Identify and plot the trail network leading to and from the site, nearby security cover, and adjacent foraging sites, and protect and avoid these features to the extent possible during road construction. Cover, vegetation, and hydrology of the site itself will be protected since the lick is located on the slope opposite from the NAR.</li> <li>o After construction, increase the awareness of Project-related vehicle drivers of the greater likelihood of encountering ungulates between the relevant NAR kilometre markers.</li> <li>o Consider wildlife crossings along with speed signage, but this should be weighed against the potential to attract attention to the location, which could potentially result in local increased moose harvest.</li> <li>o Continue to maintain the camera traps before, during, and after road construction and operation to monitor potential effects of disturbance from road traffic on use of the lick by ungulates, if any. Information gained from this monitoring will be used to inform future road developments.</li> </ul> </li> </ul>	WPP	Yes	<p>WPP Wildlife Protection Plan Section 4.4: Procedures During Construction Phase;</p> <p>EMAMP - Appendix G: Wildlife Monitoring Plan Section 8.5: Mineral Lick Monitoring Data Analysis, Interpretation and Reporting</p>	
Wildlife Protection Plan (WPP)	Wildlife Protection Plan	TH Proposed Conditions (March 2020) (YOR 2017-0211-3971)	<p>The Wildlife Protection Plan will include the following conditions to eliminate or mitigate adverse effects from the Project on injury/mortality of large carnivores (i.e., Wolverine and larger):</p> <ul style="list-style-type: none"> <li>a) If dens in active use by large carnivores are discovered, the Proponent shall record these locations and avoid them in a manner that mitigates the risks of animal harm or den abandonment until the dens are no longer in use.</li> <li>b) The Waste and Hazardous Materials Management Plan shall include the regular collection of garbage and debris destined for disposal, and prior to incineration, shall store it in wildlife-proof containers in a manner that does not attract wildlife.</li> <li>c) The Proponent shall ensure the Wildlife Protection Plan and mine operations and management plans identify measures to deter wildlife access to the mine site and facilities, including the kitchen/camp facilities, Heap Leach Facility, event ponds and processing areas. The Proponent shall implement specific measures to deter bears (and other wildlife) from accessing mine facilities (e.g., electric fencing, secure storage of potential attractants).</li> </ul>	WPP	Yes	<p>WPP Section 4.2.2: Reduce Human-Wildlife Encounter Risks;; Section 4.3.4: Carnivores</p>	