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B.2 – FIRST NATIONS AND COMMUNITY CONSULTATION

B.2.1 INTRODUCTION

As summarized in Section 2 of the Proposal, CMC has shared information and consulted with potentially affected First Nations, local communities, Yukon government and federal agencies, non-government organizations (NGOs), and individuals since 2008. CMC's consultation program included a range of techniques to identify concerns and methods to address those concerns. Techniques used by CMC to consult included: one-on-one, group and community meetings, Open Houses, presentations, field trips, general and Project Proposal meetings, interviews and questionnaires, as well as phone calls, e-mails, and letters.

On January 27, 2015, the Executive Committee requested that CMC provide supplementary information to the Casino Project (YESAB Project No. 2014-0002) to enable the Executive Committee to commence Screening. The Executive Committee considered comments from various First Nations, Decision Bodies and regulators on the adequacy of the Project Proposal in the preparation of the Adequacy Review Report (ARR). CMC provided a Supplementary Information Report (SIR-A) on March 16, 2015. Subsequently, the Executive Committee issued a second Adequacy Review Report (ARR No.2) on May 15, 2015 following a second round of review. CMC is providing this Supplementary Information Report (SIR-B) to comply with the Executive Committee's Adequacy Review Report ARR No.2; CMC anticipates that the information in the two SIRs and in the Proposal, when considered together, is adequate to commence Screening.

The Executive Committee has 4 requests for supplementary information related to Section 2 and Section A.2 First Nations and Community Consultation of the Project Proposal and SIR. These requests are outlined in Table B.2.1-1.

Table B.2.1-1 Requests for Supplementary Information Related to First Nations and Community Consultation

Request #	Request for Supplementary Information	Response
R2-207	Provide a record of discussions and concerns raised by all affected trapline concession holders. The discussion shall include an assessment of potential impacts and any proposed mitigations for all trapping concessions, focusing on concessions #150 and #408.	Section B.2.2.1.1
R2-208	Provide a record of discussions and concerns raised by all affected outfitting concession holders. The discussion shall include an assessment of potential impacts and any proposed mitigations for all outfitting concessions.	Section B.2.2.1.2
R2-209	A description of any contact or discussions between CMC and mineral rights holders in relation to the road. Also include a description of how many mineral claim holders have been contacted and a summary of the concerns raised.	Section B.2.3.1.1
R2-210	Assessment of effects, and potential mitigations if required, on the Yukon Quest.	Section B.2.4.1.1

B.2.2 TRAPPING AND OUTFITTING

B.2.2.1.1 R2-207

R2-207. Provide a record of discussions and concerns raised by all affected trapline concession holders. The discussion shall include an assessment of potential impacts and any proposed mitigations for all trapping concessions, focussing on concessions #150 and #408.

CMC has continued to consult with land tenure holders (i.e., concession holders, quartz and placer claim holders, etc.), and will continue to do so throughout the assessment process. In June 2015 letters were sent to all trapline concession holders within 500 m of the Project (Figure B.2.2-1) to invite direct communication with CMC as well as invite the land tenure holders to participate in the YESAB process. The updated consultation log, to reflect the activities in 2015 is provided in Table B.2.2-1. Letters were received from the holders of concessions #116 and #121, and echoed concerns expressed previously, including:

- The potential loss and decrease of available area for trapping and outfitting during construction, operations and closure and decommissioning of the Project;
- Easier access to area for others whose activities may conflict with trappers and outfitters (due to the Freegold Road Upgrade);
- Easier access to permitted concession areas for trappers and outfitters (due to the Freegold Road Upgrade);
- Reduced wilderness experience for trappers and outfitters utilizing the area;
- Negotiated road access to areas for existing trappers and outfitters (Freegold Road Extension); and
- Reduced access to trapping and outfitting concession areas due to Project traffic during construction, operations and closure and decommissioning.

As described in the response to R405, CMC considered the above in the Proposal, and the subsequent mitigation measures and assessment of effects.

Both concession holders expressed interest in continued meetings with CMC. CMC will continue this engagement in 2016 and throughout the assessment and Project development processes.

Specifically to the Executive Committee's request for consideration of concessions #150 and #408, concession holder for concession #150 has been contacted multiple times (Table B.2.2-1), and will continue to be contacted with requests for meetings once the Project progresses into the Screening phase of the YESAB assessment. Concession #408 is a closed concession, due to the proximity to Carmacks (i.e., closed "Community Radius Area") and therefore there is no owner to be contacted.

Table B.2.2-1 Consultation for Trapline Concession Holders – 2015 update

Concession #	Date and Event Type	Event Summary
116	April 15, 2013 Phone call	Left a voicemail requesting a call back to discuss his trapline and the Project
	May 10, 2013 Meeting	Trapper outlined the importance and scope of his trapping activities in the project area and stated concerns about the environmental effects the project is likely to result in including a reduced amount of wildlife within his trapline area. Suggested he would like to find an amicable solution with CMC.

Concession #	Date and Event Type	Event Summary
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
	June 30, 2015 Letter	Response from trapline holder re: June 9 letter. Request to meet to discuss impacts to trapline from freshwater pipeline and access road.
	June 30, 2015 Email	Response to above letter from CMC committing to set up a meeting.
121	May 22, 2012 Letter	CMC extended an invitation to attend a community meeting on the project in Carmacks on 12/05/28 or in Whitehorse on 12/05/30.
	Sept 25, 2012 Email	CMC Socio-economic consultant requested a meeting to discuss the Project and the stakeholder's trapline; stakeholder agreed. Stakeholder provided the name of another trapper who should be consulted.
	Oct 3, 2012 Meeting	Socio-economic data collection. Trapper provided information on his trapline, including access, use and harvest information. Noted that access could be an issue unless it is controlled. Requested regular updates and communication on the Project. Concerns: (a) access of others to the trapline; (b) open communication.
	Oct 15, 2012 Email	Socio-economic data collection. Discussed trapping and potential project effects on his tenure. Project will have limited effects on his tenure as long as it is confined to the upper portion. Concern: (a) project effects on trapping in portions of the tenure.
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
	June 22, 2015 Phone Call	Response from trapline holder re: June 9, 2015 letter. Request to continue engagement.
122	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
131 & 147	unassigned	
146	Multiple dates	Trapline owned by Chief McGuinty of the Selkirk First Nation. Numerous consultation events have been held with the Chief and he is fully aware of CMC's planned activities.
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
148	May 22, 2012 Letter	CMC extended an invitation to attend a community meeting on the project in Carmacks on 12/05/28 or in Whitehorse on 12/05/30.
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
149	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
150	May 22, 2012 Letter	CMC extended an invitation to attend a community meeting on the project in Carmacks on 12/05/28 or in Whitehorse on 12/05/30.
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
151	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
408	Community Radius Area (closed)	

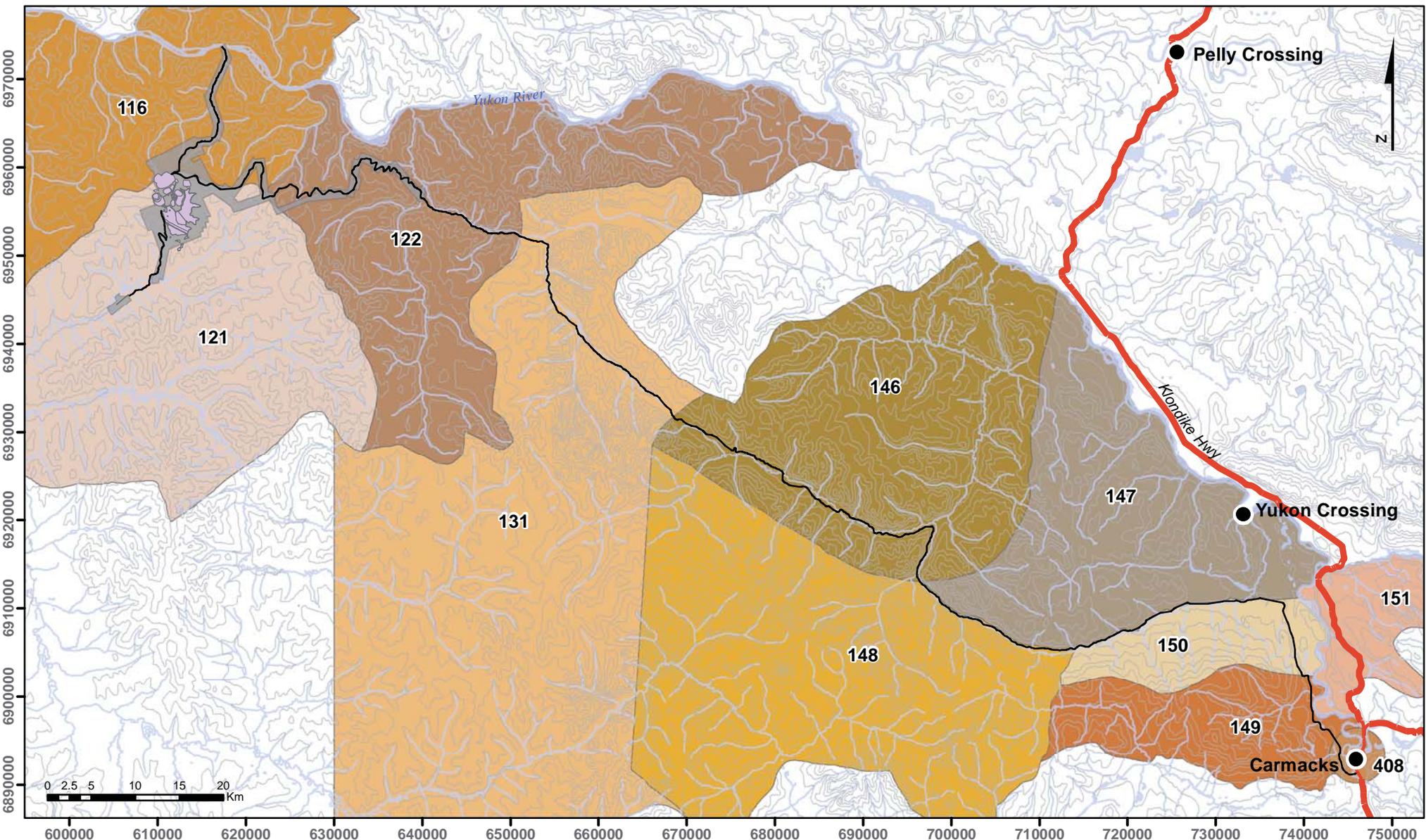


Figure B.2.2-1
Trapping Concessions
within 500m Buffer Zone

Trapping Concessions

- 116
- 121
- 122
- 131
- 146
- 147
- 148
- 149
- 150
- 151
- 408

- Proposed Mine Facilities
- Casino Claims
- Proposed Freegold Road Upgrade and Extension

Date: 09/06/2015
 Author: hbrown
 Coordinate System: NAD 1983 UTM Zone 7N
 Projection: Transverse Mercator
 Datum: North American 1983

Effects of the Project on trapping and outfitting are summarized in Table B.2.2-2.

Table B.2.2-2 Summary of Effects on Trapping and Outfitting

Residual Effect	Direction	Project Proposal Section
Loss of area for recreational or subsistence harvesting	Adverse	p. 18-30
Improved access for recreational and harvesting	Adverse and Beneficial	p. 18-30
Increased noise, emissions, and traffic	Adverse	p. 18-30
Loss of area for trapping and outfitting activities	Adverse	p. 19-36
Increase in access and activities conflicting with traditional land use activities	Adverse	p. 19-36
Reduced access to permitted tenure	Adverse	p. 19-36
Negotiated access for existing trappers / outfitters	Adverse / Neutral	p. 19-36
Easier access for existing trappers and outfitters (Freegold Road Upgrade)	Beneficial	p. 19-36
Reduced access to trapping and guide outfitting concession areas from construction and traffic (Freegold Road Upgrade)	Adverse	p. 19-37
Easier access for activities that may conflict with trappers and guide outfitters	Adverse	p. 19-37
Reduced wilderness experience for trappers and guide outfitters	Adverse	p. 19-37

Mitigations for effects on trapping and outfitting primarily involve restriction of access and protection of wildlife. Proposed mitigations, as summarized in Section A.24 of SIR-A are outlined in Table B.2.2-3.

Table B.2.2-3 List of Commitments Related to Mitigation of Effects on Trapping and Outfitting

Number	Commitment	Adverse Residual Effect	Section
3	CMC intends to continue to engage with First Nations to discuss topics of interest.	<ul style="list-style-type: none"> Consultation with Selkirk First Nation regarding access points for the project. Effects on increased access on subsistence hunting, fishing and harvesting. 	2
4	CMC will monitor project socio-economic effects and adapt management measures where required.	Development and use of spur roads off of the primary Casino project access road.	2
6	CMC will work with First Nations to arrange for access as appropriate consistent with the access road management plan as approved by First Nations and Yukon Government.	Increased traffic and spur roads.	2
16	Road Use Plan <ul style="list-style-type: none"> CMC will develop a final plan prior to construction and operations. The final plan will include a table of commitments with mitigation measures developed through the 	N/A	22.3 Appendix A.22E Road Use Plan

Number	Commitment	Adverse Residual Effect	Section
	<p>environmental assessment process, and terms and conditions of any applicable licences, permits and approvals required for Project operation.</p> <ul style="list-style-type: none"> It is the intent of CMC to negotiate a Freegold Road Extension Access Management Agreement with the Government of Yukon, SFN and LSCFN to address how the private road and access control could be managed to meet the Project requirements with consideration of existing tenure holders and individuals. 		
88	<p>To mitigate potential effects on wildlife from construction, operation and closure and decommissioning of the Freegold Road upgrade and extension, CMC will:</p> <ul style="list-style-type: none"> Design road embankment heights and materials to allow for wildlife movement; Manage snow embankments along the road to allow wildlife easier crossing of the Freegold road and reduce the likelihood of wildlife getting trapped between embankments, mitigating potential barrier effects and mortality risk; Control access of non-project personnel to the road by installing and manning a gate, mitigating mortality risk; Radio communication among drivers to warn others when wildlife are observed along the road, mitigating mortality risk; and Implement measures to prevent and manage spills to reduce the potential for wildlife exposure to contaminants, mitigating reduced health. 	<ul style="list-style-type: none"> Loss of wildlife habitat Restrict wildlife movement Increased wildlife mortality 	12.3
91	<p>CMC will mitigate the risk of increased caribou mortality from harvest by managing the Freegold Road extension as a private industrial road by:</p> <ul style="list-style-type: none"> Restricting access to the road during operation by installing a continuously manned gate at Big Creek; Decommissioning the road during the reclamation and closure phase; and Development of a wildlife management working group, including regulators and stakeholders, to provide advice to governments on mitigation, monitoring and adaptive management strategies. 	Increased caribou mortality	12.3
123	<p>Access Mitigation - A Road Use Plan (Section 22) will be developed for the Project in coordination with First Nations and the Yukon Government which will include:</p> <ul style="list-style-type: none"> No public access on the Freegold Road Extension or access by permit, as directed and agreed by the Yukon and First Nation governments. Controlled, gated, manned access at the new bridge over Big Creek or as otherwise agreed. A stakeholder communication /engagement plan to ensure concerns are identified and addressed. 	General cultural effects related to access as the result of the use of the Freegold Road Extension.	18.4 22 Appendix A.22E Road Use Plan
124	A traffic communication bulletin /update will be circulated in local communities and to key stakeholders on a routine basis to inform	General cultural effects related to access	18.4 Table 18.4-

Number	Commitment	Adverse Residual Effect	Section
	users of current road status.		4
125	An information line will also be established to answer questions regarding the Project status.	General cultural effects related to access	18.4
126	A monitoring program will be implemented to ensure that local land users are not gaining access to the Freegold Road Extension via alternative routes.	General cultural effects related to access	18.4
127	At closure, public health and safety assessment will be conducted for the mine site to identify potential risks and develop appropriate, specific long-term mitigation and management measures (such as fencing and signage).	General cultural effects related to access	18.4 Table 18.4-4
132	To mitigate against changes to access to traditional land, mineral tenures, and recreational lands CMC commits to: <ul style="list-style-type: none"> Working with First Nation and Yukon Government to ensure management of the Freegold Road Extension does not interfere with the rights of other existing tenure holders. Implement access management measures and associated monitoring and communication plans. ongoing communication with FN and local stakeholders. 	Changes to access to Traditional Territories, mineral tenures, trapping areas, guide outfit concessions and recreational areas	19.4.2
133	CMC will: <ul style="list-style-type: none"> limit mine footprint; implement appropriate EMPs (e.g., Air Quality Management Plan) and reclamation and closure measures; maintain ongoing communication with local stakeholders. 	Reduced wilderness experiences for First Nations, trappers, outfitters and recreational land users	19.4.2
134	CMC will limit this potential cumulative effect by: <ul style="list-style-type: none"> Implementing a no public access policy unless directed by the Yukon and First Nations Governments Manned access at control points Explore a cooperative approach to management of access to the Freegold Road Extension involving the Casino Mining Corporation, the Yukon government, Selkirk First Nation and Little Salmon/Carmacks First Nation. 	Overall increase in existing and future permitted placer and quartz exploration and mining activities along the Freegold Road Upgrade	19.4.2

B.2.2.1.2 R2-208

R2-208. Provide a record of discussions and concerns raised by all affected outfitting concession holders. The discussion shall include an assessment of potential impacts and any proposed mitigations for all outfitting concessions.

The Project falls within Outfitting Concessions 11 (Prophet Muskwa Outfitters), 13 (Mervyn's Yukon Outfitting Ltd.) and 14 (Trophy Stone Outfitting Ltd.) (Figure B.2.2-2). CMC has continued to consult with concession holders, and will continue to do so throughout the assessment process. In June 2015 letters were sent to all outfitting concession holders within 500 m of the Project to invite direct communication with CMC as well as invite the land

tenure holders to participate in the YESAB process. No response was received from any of the three outfitting concession holders. The updated consultation log, to reflect the activities in 2015 is provided in Table B.2.2-4.

Through previous consultation, areas of concern raised by outfitting concession holders include:

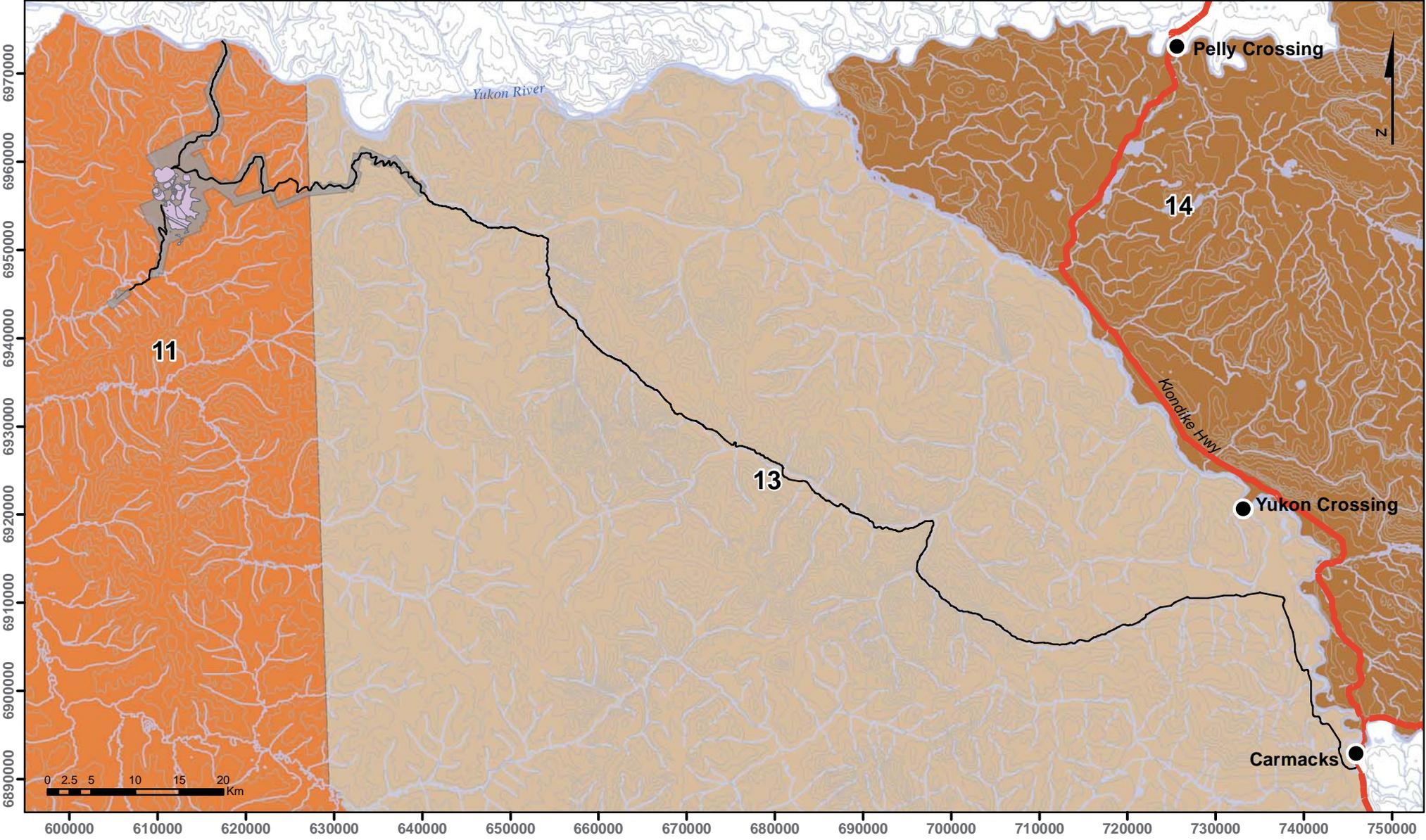
- The potential loss and decrease of available area for trapping and outfitting during construction, operations and closure and decommissioning of the Project;
- Easier access to area for others whose activities may conflict with trappers and outfitters (due to the Freegold Road Upgrade);
- Easier access to permitted concession areas for trappers and outfitters (due to the Freegold Road Upgrade);
- Reduced wilderness experience for trappers and outfitters utilizing the area;
- Negotiated road access to areas for existing trappers and outfitters (Freegold Road Extension); and
- Reduced access to trapping and outfitting concession areas due to Project traffic during construction, operations and closure and decommissioning.
- Nuisance wildlife kill resulting in fewer animals in the area, potentially affecting animals available for outfitting hunting (e.g., bears).
- Emphasise on the importance of continued consultation.

CMC considered the above in the Proposal, and the subsequent mitigation measures and assessment of effects.

Effects of the Project on trapping and outfitting are summarized in Table B.2.2-2. Mitigations related to outfitting concessions are summarized in Table B.2.2-3.

Table B.2.2-4 Consultation for Outfitting Concession Holders – 2015 update

Concession #	Date and Event Type	Event Summary
11	Nov 23, 2012 Email	CMC Socio-economic consultant requested a meeting with the stakeholder to discuss the project and potential effects on his guide-outfitting business.
	Nov 26, 2012 Email	Stakeholder responded to CMC Socio-economic consultant's request to discuss the Project and potential effects on his guide-outfitting business.
	Nov 28, 2012 Phone Call	CMC Socio-economic consultant met with the stakeholder and discuss the Project, potential effects on the guide-outfitting business
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
13	Oct 2, 2012 Meeting	Meeting with YG Tourism and Culture. Identified that Mervyn Outfitters has expressed concerns during the assessment of the Carmacks Copper Project.
	Nov 20, 2012 Meeting	CMC Socio-economic consultant met with the stakeholder and discussed the Project, potential effects on the guide-outfitting business.
	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.
14	June 9, 2015 Letter	CMC extended a request to meet to discuss the Casino Project and opportunities for involvement in the YESAB process.



CASiNO

Figure B.2.2-2
Outfitting Concessions
within 500m Buffer Zone

Outfitting Concessions

- 11
- 13
- 14

- Proposed Mine Facilities
- Casino Claims
- Proposed Freegold Road Upgrade and Extension

Date: 08/06/2015
 Author: hbrown
 Coordinate System: NAD 1983 UTM Zone 7N
 Projection: Transverse Mercator
 Datum: North American 1983

B.2.3 QUARTZ AND PLACER CLAIM HOLDERS

B.2.3.1.1 R2-209

R2-209. A description of any contact or discussions between CMC and mineral rights holders in relation to the road. Also include a description of how many mineral claim holders have been contacted and a summary of the concerns raised.

CMC has identified 31 full or partial owners of placer claims or leases within 500 m of the Freegold Road upgrade and extension and the mine infrastructure (Figure B.2.3-1). In relation to the road, there are 17 placer claim owners with active claims. All 17 of these claim owners were contacted via phone, letter or email by the consultant for CMC, as described in the response to R408. Of these 17, 6 owners were engaged in follow up discussions with the consultant, and one owner passed away during the active consultation period. Three owners engaged in multiple conversations with the consultant. These 6 owners represent 91% ownership of the placer claims along the Freegold Road. As such, the views expressed by these owners are felt to be indicative of placer claim owners in general.

As described in the response to R408, key observations from the consultations were:

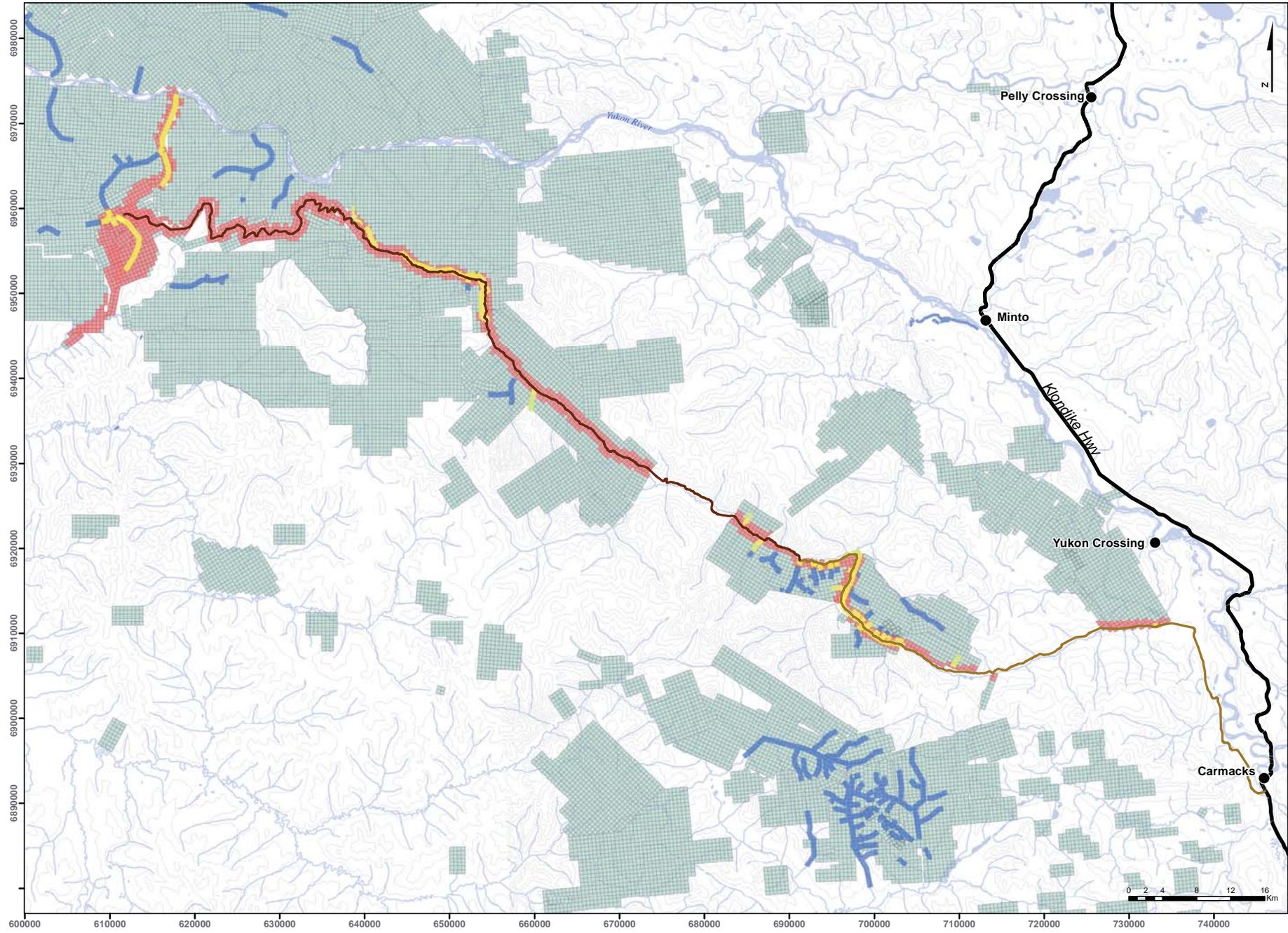
- No owners/operators interviewed or corresponded with were against the extension or upgrade of the Freegold Road, all felt that they could benefit from an improved surface on the existing Freegold Road Upgrade or possibly from the proposed new extension into the Hayes Creek area;
- All of the miners were grateful to receive the photo-mosaic maps of their claim areas;
- Most owner/operators in the Big Creek area mine upstream (south) of Big Creek and would not have potential mine areas covered with the new alignments of the Freegold Road;
- Some owners/operations had concerns regarding the potential isolation of placer by the Freegold Road;
- No owners/operators expressed opposition to the proposed Freegold Road; and
- Some placer owners/operators provided helpful local knowledge with respect to hydrology and permafrost that will assist in the detailed engineering design of the Freegold Road.

Further, in June 2015 letters were sent to 31 placer claim/lease owners within a 500 m buffer of the Freegold road and proposed mine infrastructure (i.e., Canadian Creek) to invite direct communication with CMC as well as invite the land tenure holders to participate in the YESAB process (Figure B.2.3-1). One responding email one received, which CMC responded to and indicated that future engagement would occur.

As described in R408, a specific study and engagement of quartz claim holders was not warranted because no mineral leases were identified along the proposed Freegold Road Upgrade or Freegold Road Extension. As well, the quartz claim holders have long-established rights and interests in the area and are familiar with the Casino Project, including the proposed development of the Freegold Road Extension and Freegold Road Upgrade. However, in June 2015 letters were sent to 19 quartz claim/lease owners within a 500 m buffer of the Freegold road and proposed mine infrastructure to invite direct communication with CMC as well as invite the land tenure holders to participate in the YESAB process (Figure B.2.3-1). Three responses from quartz claim owners were received, which CMC responded to and indicated that future engagement would occur.

Figure B.2.3-1

Placer and Quatz Claims within 500m Buffer Zone



- Placer Claims/Leases (contacted by CMC)
- Placer Claims/Leases (all)
- Quartz Claims/Leases (contacted by CMC)
- Quartz Claims/Leases (all)
- Klondike Highway
- Freegold Road Extension
- Freegold Road Upgrade

Date: 18/11/2015
Author: Nicos
Coordinate System: NAD 1983 UTM Zone 7N
Projection: Transverse Mercator
Datum: North American 1983

B.2.4 OTHER LAND USERS

B.2.4.1.1 R2-210

R2-210. Assessment of effects, and potential mitigations if required, on the Yukon Quest.

The Yukon Quest International Sled Dog Race (Yukon Quest) is a 1,000 mile race between Whitehorse, Yukon and Fairbanks, Alaska and is held every February. The race lasts 9 to 14 days depending on weather, trail conditions and team speed (Yukon Quest, 2015). A portion of the Yukon Quest trail travels along the Freegold road from Carmacks then north along the Yukon River bank, crossing Williams Creek approximately 150 m upstream of the Yukon River confluence. The Project may impact the Yukon Quest dog sled race if the race is disrupted by increased traffic using the Freegold Road during the running of the race.

The effect of the increased use of the Freegold Road on land users, including the Yukon Quest International Sled Dog Race (Yukon Quest) was detailed in the Carmacks Copper Project Proposal (YOR 2006-0050). Concerns raised by the Yukon Quest International Association (YOR 2006-0050-110-1) included:

- The Association would like to promote the recreational/tourist use of the trail during the winter (by snowmobilers, mushers, etc.) and possibly during the summer season (by cyclists, hikers, ATV-users, etc.).
- The Yukon Quest Trail overlaps with the Freegold Road north of Carmacks, a Race Checkpoint, for approximately 15 miles, to the point where the Freegold Road veers westward and departs from the Dawson Overland Trail routing. Road maintenance of the Freegold Road to support the proposed Project is a serious concern for the Association because of the potential impacts on the Race.
- The chief concern is that mushers would be unable to stop along a graded road, because brakes on the sleds require a solid layer of hard-packed snow to function. This poses a serious risk to safety of mushers and dogs.
- Abrasion to sleds or dogs' feet is secondary concern. Measures such as additional and/or thicker booties would reduce impacts.
- Another concern is that mushers often camp along this portion of the road for 3-6 hours during years when the race starts in Whitehorse (teams usually do not camp along this portion of the Road during the years when the Race starts in Fairbanks). Apart from these ad hoc temporary campsites, there are no staging/stopping points along this portion of the Road.
- Race support snowmachines traveling that section of the road in advance of the dog teams would also experience difficulties running on a surface graded to gravel.
- Trail breaking/clearing starts in the beginning of January (usually the first weekend) and is usually completed in three weeks.
- The Race begins on the second Saturday in February, runs for two weeks, followed by roughly two weeks of followup/ decommissioning work to permit adequate trail clearing (removal of trail markers, debris, etc.).
- When the teams start from Whitehorse, it takes approximately 3-4 days following the race start to clear the Freegold Road.
- It is unlikely that the Project and the Race can share the Freegold Road safely, should the road be required to be graded to gravel, and should the road be required to support Project vehicular traffic during

Race activities. The development of an alternate route for the Race may be the only solution. The Association would prefer an alternate route to be adjacent to the Freegold Road to preserve the historical connection. The route should not cross the Freegold Road, due to the risk of vehicle accidents with the dog teams.

- It was suggested the Proponent and/or YG Highways create a snow-packed trail, and a campsite pullout along the Road for the duration of the Race. It would require a lot of work to prepare such a trail (1- 2' of snow settled in specific cold conditions), and that sharing the road in this way would still pose a safety risk to the dogs and mushers from accidents with vehicular traffic.
- There was general agreement that shutting down mine-related use of the Road for the duration of Race activities each year *or* coordinating mine-related traffic to avoid interference with dog teams or support snowmobiles on the Road would not be feasible given the duration of Race activities and the trail conditions required.
- The Association asserted that it does not want to impede the mine's development, only that it wants to protect the interests of the Race and the potential for the expansion of the use of the Yukon Quest Trail.

Subsequent assessment of the Carmacks Copper project by the Executive Committee considered the following alternatives with representatives of the Yukon Quest, but deemed them all to be unfeasible for the reasons provided:

- *Shutting down Project related traffic for the duration of Yukon Quest activities.* This alternative was deemed unfeasible because of the duration of Yukon Quest activities from trail preparation to post-race clean-up (January to mid-March). Closing the road for this length of time would significantly affect Project activities and potentially worker safety.
- *Coordinating mine related traffic to avoid interference with dog teams and/or support snowmobiles on the road during the race activities* (via radio contact, for example). This alternative was deemed unfeasible because of the duration of Yukon Quest activities and because of the incompatibility of road conditions required for the Yukon Quest versus the Project (i.e., snow-packed versus graded to near-gravel).
- *Sharing the Freegold Road by creating a snow-packed trail parallel to a graded strip and a campsite pullout for the duration of the Yukon Quest.* This alternative was deemed unfeasible primarily because the road is too narrow to allow for a snow trail for the Yukon Quest and a graded strip for Project trucks and equipment, posing a serious safety risk to the dog teams and mushers, as well as Project personnel and equipment.

During assessment of the Carmacks Copper Project the Executive Committee found that the creation of an alternate trail/route was the only feasible measure to effectively mitigate the adverse effects to the Yukon Quest and other existing winter users that would result from the Project use of the Freegold Road each winter.

Mitigation measure #99 of the Executive Committee Screening Report and Recommendation (YESAB, 2008), stated that "*Due to the opening of the Freegold Road during the winter months, safe routing for the Yukon Quest shall be established. The route shall follow existing linear disturbances (e.g., Freegold Road right-of-way, trails and cutlines) where possible, or result in the cutting of new trail less than 1.5 metres in width.*" This measure was then accepted by the Yukon Government in the YESAA Decision Document (Yukon Government, 2008).

CMC suggests incorporating the same recommendation into the Casino Project Proposal to mitigate effects to users who travel the Freegold Road in the winter. CMC further suggests that, in accordance with the Carmacks Copper Screening Report (YESAB, 2008), "since establishment of a multi-use trail is a measure required to

mitigate potential adverse effects on current land use practices, the development of the trail” be scoped into the assessment of the Casino Project. And that *“Potential environmental and socio-economic effects associated with development of the trail were anticipated to be minimal. There will be minimal effects to users who currently travel the Freegold Road during the winter, since the multi-use trail will be appropriate for off-road vehicles or dogsleds exclusively, as the Freegold Road currently is. With the application of the mitigative measures outlined in the following section, significant environmental effects associated with development of the trail are not anticipated.”* (YESAB, 2008).

Additionally, as suggested in the Carmacks Copper Project assessment, CMC will contact the Yukon Quest in early January of each year to establish a process for safe crossing of the Freegold Road during the race.