

TABLE OF CONTENTS

A.18 – CULTURAL CONTINUITY	A.18-1
A.18.1 INTRODUCTION.....	A.18-1
A.18.2 HERITAGE MANAGEMENT PLAN	A.18-2
A.18.2.1.1 R392	A.18-2
A.18.3 NATURE AND NUMBER OF ARCHAEOLOGICAL AND HISTORIC SITES	A.18-7
A.18.3.1.1 R393	A.18-7
A.18.4 FREEGOLD ROAD HISTORIC SITES	A.18-8
A.18.4.1.1 R394	A.18-8

LIST OF TABLES

Table A.18.1-1 Requests for Supplementary Information Related to Cultural Continuity	A.18-1
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APPENDICES

Appendix A.18A Heritage Resources Summary Report
Appendix A.18B Heritage Sites Summary

A.18 – CULTURAL CONTINUITY

A.18.1 INTRODUCTION

The Proposal assessed the potential effects of the Casino Project (the Project) on the ability of communities or individuals to sustain their cultural identity; this ability is dependent on having access to resources that support cultural retention and provide opportunities to participate in cultural activities. Cultural Continuity was selected as a Valued Component (VC) by Casino Mining Corporation (CMC) because this component was deemed important from consultations with local First Nation and other regional residents.

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). Casino Mining Corporation is providing this Supplementary Information Report (SIR) to comply with the Executive Committee's Adequacy Review Report; CMC anticipates that the information in the SIR and Proposal, when considered together, is adequate to commence Screening.

The Executive Committee has three requests related to information presented in Section 18 Cultural Continuity of the Proposal submitted on January 3, 2014. These requests are outlined in Table A.18.1-1. Some responses require detailed technical information, data, and figures. Where necessary, this additional supporting information is provided as appendices to the SIR.

Table A.18.1-1 Requests for Supplementary Information Related to Cultural Continuity

Request #	Request for Supplementary Information	Response
R392	A Heritage Management Plan including: a. a description of input from First Nations including Traditional Knowledge; b. a range of mitigation measures; c. heritage resource management framework; d. definitions and objectives; and e. a monitoring and evaluation mechanism.	Section A.18.2.1.1 Appendix A.18A Heritage Resources Summary Report Appendix A.18B Heritage Sites Summary
R393	A table summarizing the number of historical and archaeological sites, their relative location in relation to the mine site, the Freegold Road Upgrade, the Freegold Road Extension, the airstrip location and associated borrow sites. Within that table include additional details such as: a. characterization of predicted disturbance; b. proposed Mitigation; c. description of the site; d. if applicable, the Project component footprint that the site overlaps; and e. site name, date of discovery, general location and traditional territory.	Section A.18.3.1.1 Appendix A.18B Heritage Sites Summary
R394	Clarification regarding whether avoidance is possible for the five historic sites located along the Freegold Road Extension. If not, a description of next steps and proposed mitigations is required.	Section A.18.4.1.1 Appendix A.18B Heritage Sites Summary

NOTES:

1. Request # refers to the assigned identification number in the YESAB Adequacy Review Report January 27, 2015 Prepared by the Executive Committee of the Yukon Environmental and Socio-economic Assessment Board.
2. Response refers to the location of CMC's response to the YESAB request for supplementary information.

A.18.2 HERITAGE MANAGEMENT PLAN

A.18.2.1.1 R392

R392. A Heritage Management Plan including:

- a. a description of input from First Nations including Traditional Knowledge;**
- b. a range of mitigation measures;**
- c. heritage resource management framework;**
- d. definitions and objectives; and**
- e. a monitoring and evaluation mechanism.**

The Executive Committee requests additional information related to the Heritage (Resources) Management Plan for the Project in order to understand potential effects to heritage resources.

Interim Heritage Resources Management Plan

Casino Mining Corporation has developed a draft Interim Heritage Resources Management Plan (IHRMP) to ensure the immediate and ongoing protection and management of heritage resources within existing developments and planned work at CMC's property. The draft IHRMP presents action items and communication protocols to assist CMC staff with the orderly and successful management of known heritage sites and chance finds. The current scope of the IHRMP includes the mine site, Yukon River pipeline, Casino airstrip and access road. It is CMC's intention to expand the application of the plan to include the Freegold Road Extension (and possibly the Freegold Road Upgrade). The action items and communication protocols presented in the draft IHRMP are intended to be used as the basis moving forward for the entire Project until replaced by a final HRMP that will be submitted to Yukon Energy, Mines and Resources as part of the Quartz Mining License (QML) application.

The draft IHRMP document was not included in the Proposal submission and is not included in this SIR because CMC intends for it to be reviewed by First Nations and the Heritage Resources Unit of the Department of Tourism and Culture prior to implementation.

Final Heritage Resources Management Plan

Casino Mining Corporation is required to submit a HRMP to Yukon Energy, Mines and Resources as part of the QML application. Casino Mining Corporation will develop a HRMP to comply with the *Yukon Historic Resource Act* and the *Yukon Archaeological Sites Regulation*. Heritage resources in the Yukon are protected and managed under provisions of the *Yukon First Nations Umbrella Final Agreement* (UFA), Chapter 13 and the enabling legislations: the *Yukon Historic Resources Act*, and the *Inuvialuit Final Agreement*. The HRMP will also take into consideration the following applicable legislations:

- The Placer Mining Regulation (O.I.C. 2003/59) – under the Placer Mining Act specifically Schedule Operating Conditions, Section E regarding historic objects and burial grounds;
- The Quartz Mining Regulation (YOIC 2003/64) – under the Quartz Mining Act specifically Schedule 1 Operating Conditions, Section E regarding historic objects and burial grounds;
- The Land Use Regulation under the Territorial Lands (Yukon) Act – specifically Section 9 (Prohibitions); and
- Chapter 13 (Heritage) of the Selkirk First Nation Final Agreement.

In addition to meeting the QML license requirements, CMC intends to engage First Nations in developing and reviewing the HRMP so that it meets their expectations, out of respect for the intimate connection between First Nations and the area and the commitments made to First Nations.

Part a.

In the development of the draft IHRMP, CMC and its consultants engaged the SFN and Heritage Resources Unit. The proposed IHRMP action items and communication protocols incorporate communications between CMC, the Heritage Resources Unit, and the SFN on the IHRMP. CMC intends for the IHRMP to be reviewed by the SFN and Heritage Resources Unit prior to implementation.

As part of the each known heritage site or newly recorded site in the Project area has been flagged and a 30 m buffer established around each known site, which is also marked with durable signage.

The IHRMP provides for continued communications with First Nations and the Heritage Resource Unit. The purpose of these communications is to ensure that information about newly recorded heritage sites and resources, or impacts to heritage sites or resources are passed along in a timely manner to the Heritage Resources Unit and applicable First Nations. All results from the heritage assessments and mitigation efforts will be shared in a timely manner by CMC.

Casino Mining Corporation values the knowledge and expertise that is held by knowledge holders and if available and appropriate, CMC will take TK and TLU information into consideration to further the Project's understanding of potential effects, including for the development of the HRMP. It continues to be the intention of CMC to collaboratively work with First Nations to develop and agree upon approaches for TK and TLU data collection and consideration for the Casino Project.

Part b.

The Heritage Resources Summary Report (Appendix A.18A) is a summary document, prepared by CMC's consultant Ecofor Consulting Ltd. (Ecofor), for the Executive Committee. The summary document identifies the completed heritage assessment and mitigation works and the remaining work proposed to be completed for the Project.

Prior heritage resources assessments were completed on behalf of CMC under the following permits:

- Heritage Resource Impact Assessment of the Proposed Casino Trail Route Km 33-58.5, West Central Yukon, Permit No. 88-03ASR (Gotthardt 1988);
- An Archaeological Impact Assessment of Proposed Developments within Pacific Sentinel Gold Corp's Casino Exploration Property near Carmacks, West-Central Yukon Territory, Permit No. 94-09ASR (Handly, Merchant, and Rousseau 1994);
- An Archaeological Impact Assessment for Community and Transportation Services (Yukon Territorial Government) Proposed Freegold Road Upgrading and New Realignment (KM 0-20) Near Carmacks, Yukon, Permit No. 94-22ASR (Handly and Rousseau 1995);
- Freegold Road Archaeological Impact Assessment (KM 20-33) and Mount Nansen Road Overview Assessment, near Carmacks, Yukon, Permit No. 95-01ASR (Gotthardt 1995);
- Archaeological Salvage of KbVb-2 and Archaeological Impact Assessment of the Area West of KaVb-1 on the Freegold Road, near Carmacks, Central Yukon, Permit No. 95-02ASR (Hammer 1995);

- 2009 Historical Resource Assessment Western Copper Corporation Casino Project, Permit No. 09-09ASR (Soucey et al 2010a);
- Historical Resource Assessment Britannia Creek Road Re-Alignment – Casino Project Western Copper Corporation, Permit No. 10-04ASR (Soucey et al 2010b);
- Historic Resource Impact Assessment of the Proposed Freegold Road Extension km 0 to km 132 (previously known as Freegold Road km 60 to km 196), Permit No. 11-04ASR (Mooney 2011);
- Western Copper and Gold Corporation Casino Project Archaeological Resources Mitigation KdVi-1, KeVi-6, KfVi-2, KfVi-3, KfVi-4, and KfVi-5, Permit No. 13-06ASR (de Guzman et al 2014);
- Heritage Resource Impact Assessment of the Proposed Freegold Road Extension 33 km to 196 km, Permit No. 13-07ASR (Mooney 2013a); and
- Data Recovery Excavations at Site KfVi-5, Permit No. 13-18ASR (Mooney 2014).

Additional permitted work along the proposed Freegold Road Extension for another proponent includes Historic Resource Impact Assessment of the Combined Northern Freegold Resources 2011 Exploration Program (Tinta Hill, Freegold, Nucleus, and Revenue Properties), Permit No. 11-13ASR (Mooney 2012), and Historic Resource Impact Assessment of the Combined Northern Freegold Resources 2012 Exploration Program, Permit No. 12-03ASR (Mooney 2013b).

Three categories of heritage work remain to be completed for the Project, these consist of:

- Heritage impact assessment work where assessments were not previously completed;
- Management of impacts to heritage resources (such as avoiding sites, monitoring construction, and mitigating negative impacts where needed through detailed data recovery excavations); and
- Managing chance heritage finds during construction.

Casino Mining Corporation will complete the first two categories of work after final “for construction” designs are available and prior to construction. The first steps are to review the final Project design to identify any areas where heritage resource impact assessments were not previously completed. Impact assessments will be carried out to summarize the management recommendations for archaeological sites and historic resources that may be impacted by the Project development. Section 2 of Appendix A.18A describes potential areas remaining to be assessed.

A summary of the known archaeological, historic structures and resources, and First Nations use sites are provided in the following sections of the Casino Heritage Summary Report (Appendix A.18A):

- Section 3 summarizes the archaeological sites to be managed along the Freegold Road;
- Section 4 summarizes historic structures and resources to be managed along the Freegold Road;
- Section 5 presents archaeological sites to be managed near the mine site, road to the Yukon River, the Casino airstrip, and airstrip access road;
- Section 6 summarizes the historic structures and resources to be managed near the mine site, road to the Yukon River, the Casino airstrip, and airstrip access road;
- Section 7 lists some previously noted First Nation use sites along the proposed upgrading of the Freegold Road.

All potentially sensitive information has been removed from this public version of the Casino Heritage Summary Report, including the two appendices at the end of the report. Appendix I which has been removed contained the Project maps for the location of sites and Appendix II contained a detailed table listing the location of the remaining areas to be assessed, the archaeology sites to be managed, the historic structures and resources to be managed, and some previously noted First Nation use sites along the proposed Freegold Road upgrade.

Each site is presented in the Casino Heritage Summary Report with a brief summary of the available information including potential impacts and recommendations for the management of potential impacts (or mitigation measures).

Part c.

Casino Mining Corporation assumes that the Executive Committee is requesting information on the proposed policies, action items and communication protocols that will be put in place for the Project to ensure the protection of heritage resources.

Heritage Resource Protection Policy

Casino Mining Corporation will develop a Heritage Resource Protection Policy that will be the foundation for accomplishing heritage resource protection and for establishing the heritage resource management framework for the Project. The Policy and the contents of the HRMP will inform and guide Project decisions relating to heritage resources and could include commitments around:

- Developing a Heritage Resource Management Plan;
- Incorporating First Nations views and traditional knowledge in planning, development and operations;
- Incorporating heritage resource protection into all Project activities;
- Delivering heritage and cultural awareness training to CMC employees and contractors; and
- Maintaining the confidentiality of First Nations traditional knowledge and heritage sites.

Action Items and Planned Tasks

Casino Mining Corporation will outline key action items and planned tasks to ensure the protection of heritage resources. These key action items can include:

- Flagging and/or reflagging and signage of known heritage sites and establishing a 30 m buffer around each site with appropriate signage;
- Creating and placing heritage resource warning and information posters in prominent locations, followed by reviewing the information with CMC staff, camp managers, contractors and all visitors;
- Establishing a procedure for any new ground disturbing activities;
- Establishing a procedure for chance finds; and
- Establishing a communications procedure.

Part d.

The objectives of the HRMP will be informed and established by discussions between First Nations, the Heritage Resource Unit, and CMC. At this time, CMC anticipates that the HRMP will have three primary objectives: heritage resource protection, compliance with regulations and licence requirements, and First Nations

involvement. Through these processes, CMC anticipates definitions for key terms within the HRMP will also be defined.

The Umbrella Final Agreement does not provide specific definitions of heritage resources but it does distinguish the types of resources. Part 6 of the Historic Resources Act does provide more detailed definitions which are presented below along with general definitions used in the common practice of heritage resource impact assessments.

A *Site* is an area or a place, or; a parcel of land which contains heritage resources or objects.

Ethnographic objects refer to an item of material culture relating to the history and traditional culture of an ethnic group.

Historic Sites contain heritage resources that are greater than 45 years in age and pose significant heritage value. By convention, historic sites date to the period for which written records are available; in this case, the historic period commences with the arrival of the Hudson's Bay Company in the early to mid-19th century. Historic sites may include cabins, caches, camps, brush camps, and any other manmade structures, features or objects that date between about 1960 and 1830.

Archaeological or Prehistoric Sites generally represent use before European contact and are found on or under the ground surface, and may consist of the remains of ancient camps, including hearths, animal bone and stone tools and debris. In this usage, an Archaeological Site equates to a Prehistoric Site (a site that dates to the period before written history). Note, however, that in heritage resource management usage, archaeological resources are viewed as resources that are in subsurface context (buried) and may also include historic period objects and features.

Proto-historic Sites can be viewed as prehistoric sites from a time period which includes the effects of foreign historic cultures but lacks the first hand written descriptions of that area. For example, in the Yukon the proto-historic period ends with the appearance of first hand written descriptions in the mid-1800s. However the proto-historic time period extends back thru time when foreign materials such as "drift-iron" from ship wrecks on the west coast, or foreign trade items were carried into the Yukon. Examples of foreign historic materials which predate the mid-1800s found in prehistoric contexts usually represent this proto-historic period.

Palaeontological Resources include the fossilized, mummified, or skeletal remains of previous life forms. These resources may be found in sedimentary rock formations, or eroding streams and creeks and contain a great deal of information concerning past environments. The most common of these resources include the skeletal remains of ice age mammals which are often associated with dark humic deposits. These remains may date from approximately ten of thousands to many hundreds of thousands of years before present.

Human remains means non-fossilized remains of human bodies that are found outside a recognized cemetery or burial site.

Part e.

The HRMP will include mechanisms for reporting, monitoring and evaluation for the protection of heritage resources.

Reporting

The HRMP will outline the process to follow for reporting a suspected heritage site or feature. This section of the HRMP will include contact information for agencies and First Nations. As well, a schedule will be developed for

training all employees and contractors to respect the Heritage Resource Protection Policy and adopt the protocol for reporting and protection of heritage resources.

Monitoring and Evaluation

Casino Mining Corporation is willing to work with affected First Nations and the Heritage Resource Unit to monitor and evaluate the success of the HRMP by establishing a monitoring framework. The mechanisms will need to be agreed upon by all parties but could include annual reports that will be generated to summarize results and include data on the number of chance finds, data recovery efforts, training on the Heritage Resource Protection Policy and other evaluative indicators.

Monitoring and evaluation of the HRMP will also inform development of adaptive management strategies as required in consultation with agencies and First Nations and help to determine effectiveness of proposed mitigations and/or adaptive measures.

A.18.3 NATURE AND NUMBER OF ARCHAEOLOGICAL AND HISTORIC SITES

A.18.3.1.1 R393

R393. A table summarizing the number of historical and archaeological sites, their relative location in relation to the mine site, the Freegold Road Upgrade, the Freegold Road Extension, the airstrip location and associated borrow sites. Within that table include additional details such as:

- a. characterization of predicted disturbance;**
- b. proposed Mitigation;**
- c. description of the site;**
- d. if applicable, the Project component footprint that the site overlaps; and**
- e. site name, date of discovery, general location and traditional territory.**

Appendix A.18B Heritage Sites Summary presents a list of all known historical and archaeological sites, their relative location in relation to the mine site, Freegold Road, Casino Airstrip or access road. For each site information has been provided on:

- Scope of possible impacts (which characterizes the predicted disturbance due to the Project and if applicable, the Project component footprint that overlaps the site);
- Management recommendations and proposed mitigation strategy;
- Current status of the site;
- Class and features of the site;
- Borden Number or Temp Site # (site name);
- Report/Permit Number and Authors;
- General location (the sites are grouped by their location relative to the Freegold Road, Mine Site or Casino Airstrip and access road).

The Casino mine site footprint falls within the SFN traditional territory and the Freegold Road Upgrade and Freegold Road Extension fall within the SFN and LSCFN traditional territories.

The information presented in Appendix A.18B has been modified from the Casino Heritage Resources Summary Report, submitted to the Yukon Heritage Management Branch, for the purpose of responding to the Executive Committee's request for information; all potentially sensitive information has been removed to protect the sites.

A.18.4 FREEGOLD ROAD HISTORIC SITES

A.18.4.1.1 R394

R394. Clarification regarding whether avoidance is possible for the five historic sites located along the Freegold Road Extension. If not, a description of next steps and proposed mitigations is required.

The historic sites (e.g., log cabins, caches, pits) that have been identified along the proposed alignment of the Freegold Road or within the proposed borrow pit locations are listed in Appendix A.18B.

Casino Mining Corporation will determine whether avoidance is possible after final "for construction" designs are available and prior to construction. Casino Mining Corporation and its consultants will review the final Project design to identify any areas where heritage resource impact assessments were not previously completed and where impact assessments will be carried out to summarize the management recommendations for archaeological sites and historic resources that may be impacted. Only then will CMC be able to determine the appropriate management strategies for the sites (such as avoidance, monitoring construction, and mitigating adverse impacts where needed through detailed data recovery excavations). If impacts are unavoidable at the sites, then CMC will review the proposed impacts and possible mitigation measures with the Heritage Resources Unit and appropriate First Nations.