



BRUCEJACK GOLD MINE  
**Heritage Management Plan**

December 2018



## BRUCEJACK GOLD MINE PROJECT

# Heritage Management Plan

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Pretium Resources Inc.  
Suite 2300, Four Bentall Centre  
1055 Dunsmuir Street  
PO Box 49334  
Vancouver, BC V7X 1L4  
T: (604) 558-1784  
F: (604) 558-4784

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# BRUCEJACK GOLD MINE

## Heritage Management Plan

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## GLOSSARY AND ABBREVIATIONS

Terminology used in this document is defined where it is first used. The following list will assist readers who may choose to review only portions of the document.

<b>AIA</b>	Archaeological Impact Assessment – An assessment carried out under a <i>Heritage Conservation Act</i> Heritage Inspection Permit to determine the impact of a development on archaeological sites.
<b>Archaeology Branch</b>	The Archaeology Branch of the British Columbia Ministry of Forests, Lands and Natural Resource Operations that administers the <i>Heritage Conservation Act</i> .
<b>BC</b>	British Columbia
<b>CE</b>	Common Era
<b>CMT</b>	Culturally Modified Tree – A tree that has been altered by Aboriginal people; for the purpose of this report only pre-1846 alterations are considered.
<b>HCA</b>	<i>Heritage Conservation Act</i> (1996) – The provincial law that authorizes and mandates British Columbia to manage heritage resources.
<b>Heritage Inspection Permit</b>	Heritage Inspection and Heritage Investigation Permits are issued under Section 14 of the <i>Heritage Conservation Act</i> subsequent to Archaeology Branch review and authorization.
<b>Legacy Site</b>	A site which has a record maintained in RAAD by the Archaeology Branch but is not protected by legislation. Examples include post-1846 CMT sites, non-designated historic sites (e.g., wagon roads), and prehistoric archaeological sites that have been completely destroyed and/or mitigated.
<b>LSA</b>	Local Study Area
<b>m</b>	Metre(s)
<b>Plan</b>	Heritage Management Plan
<b>Pretivm</b>	Pretium Resources Inc. – the proponent for the Brucejack Gold Mine Project.
<b>Project</b>	Pretium Resources Inc.’s Brucejack Gold Mine Project
<b>RAAD</b>	Remote Access to Archaeological Data; a web-based application, maintained by the Province of British Columbia, that enables authorized users to access data housed in the British Columbia Archaeological Site Inventory.
<b>RSA</b>	Regional Study Area

## 1 PURPOSE

The protection afforded to archaeological sites in British Columbia (BC) by legislation (refer to Section 4) applies to known and as yet unrecorded sites. Consequently, developments such as the Brucejack Gold Mine Project (the Project) that will involve surficial disturbance have the potential to affect archaeological sites. Certain types of sites, such as culturally modified trees (CMTs), can also be affected by logging or clearing of vegetation. For the Project, it is anticipated that earthwork activities (blasting, cutting, and filling) and vegetation clearing related to access road upgrades and transmission line construction will be the principle types of disturbances. As such, archaeological sites that may be present within or adjacent to the proposed Project development area could potentially be adversely affected.

The purpose of the Heritage Management Plan (the Plan) is to describe the protection of heritage resources and provide a framework to mitigate potential Project effects. This builds on extensive baseline heritage studies conducted for the Project (ERM Rescan 2014) that were conducted to enable implementation of mitigation measures at the planning stage, as appropriate. The Plan includes both heritage resources which have been identified adjacent to the planned work zone, as well as any that have not yet been identified but which could potentially be encountered during the course of the Construction, Operation, Closure, and Post-closure phases of the Project. Two heritage sites protected under the *Heritage Conservation Act* (HCA) have been identified within 1,000 m of the Project development footprint (refer to Section 5.1.1). There are no currently known heritage resources within the development footprint.

## 2 PERFORMANCE OBJECTIVES

The objective of the Plan is to reduce any potential adverse Project effects on archaeological sites to negligible significance through the implementation of management and mitigation measures, including avoidance or systematic data recovery.

Avoidance is the preferred management and protection measure for all archaeological sites within or adjacent to the planned work zone, whether known or as-yet unknown. It may be possible to achieve this by modifying the Project design. Where Project redesign is not feasible for the avoidance of archaeological sites, the management and mitigation strategies outlined in Section 5.3 will be followed.

### 3 SCOPE

During the Construction phase, activities such as clearing and grubbing, earthworks, excavations, and blasting have the potential to cause direct effects to protected archaeological sites, as well as protected paleontological sites, if present. As archaeological sites in this northwest BC often contain cultural materials present on the surface, archaeological sites can also be affected by increased human presence in the area during all Project phases. Thus, this Plan applies to all Project phases, components, and activities. The primary risk to heritage resources, however, will be during ground altering activities associated with the Construction phase.

## 4 RELEVANT LEGISLATION, REGULATIONS, AND EAC CONDITIONS

### 4.1 RELEVANT LEGISLATION AND REGULATIONS

In BC, the primary legislation protecting archaeological resources (both recorded and unrecorded) is the *Heritage Conservation Act* (HCA; 1996), which protects all sites predating 1846 CE on Crown and private land. Sites such as burials and Aboriginal rock art sites are protected regardless of age. The Archaeology Branch of the Ministry of Forests, Lands and Natural Resource Operations (Archaeology Branch) is the provincial ministry responsible for the administration of the HCA, issuing permits for heritage inspection, investigation, and site alterations, and maintaining a database of known archaeological sites. Burials and gravesites are also protected in BC by the *Cremation, Interment, and Funeral Services Act* (2004).

There is currently an open Heritage Inspection Permit (2014-0277) granted under Section 14 of the HCA for the Project. This permit is valid until March 31, 2016.

### 4.2 RELEVANT EAC CONDITIONS

Pretivm was granted an Environmental Assessment Certificate (#M15-01) on March 26, 2015 that included a series of conditions. This management plan fulfills Condition #2, in relation to a Component Plan for management of heritage sites, presented within Schedule B of the Certificate and copied below.

#### Condition 2

*“The Holder must prepare the Construction, Operations, Closure and Post-Closure Component Plans identified in Appendix A in consultation with, and to the satisfaction of, RRAs.*

*Component Plans, at minimum, must include the following information:*

- *Purpose of Component Plan;*
- *Performance objectives;*
- *Effects mitigation measures;*
- *Monitoring programs;*
- *Monitoring schedules; and*
- *Reporting requirements.*

*The Holder must consult with the NLG, Tahltan and TSKLH on the content and implementation of Component Plans in accordance with the ACP set out in Condition 5.*

*The Holder must implement Component Plans according to timelines set by RRAs. This can be no later than the commencement of Construction.”*

## 5 ENVIRONMENTAL PROTECTION AND MANAGEMENT

The planned work zone considered in this Plan as well as the relevant Regional Study Area (RSA) and Local Study Area (LSA) are illustrated in Figure 5-1. Due to the sensitive nature of archaeological sites, locational information is not provided in this document but will be illustrated on construction maps. This section provides the mitigation measures and best management practices for archaeological sites within 1,000 metres (m) of the planned work zone. Sites that are within the RSA but are more than 1,000 m from the planned work zone will not be affected and are not considered further in this plan.

### 5.1 MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES

This section provides mitigation measures for the two known protected archaeological sites and those sites that may be identified as a result of changes to the planned work zone and/or chance finds. It provides information on the steps required to conduct systematic data recovery at an archaeological site, if necessary.

#### 5.1.1 *Mitigation for Known Archaeological Sites*

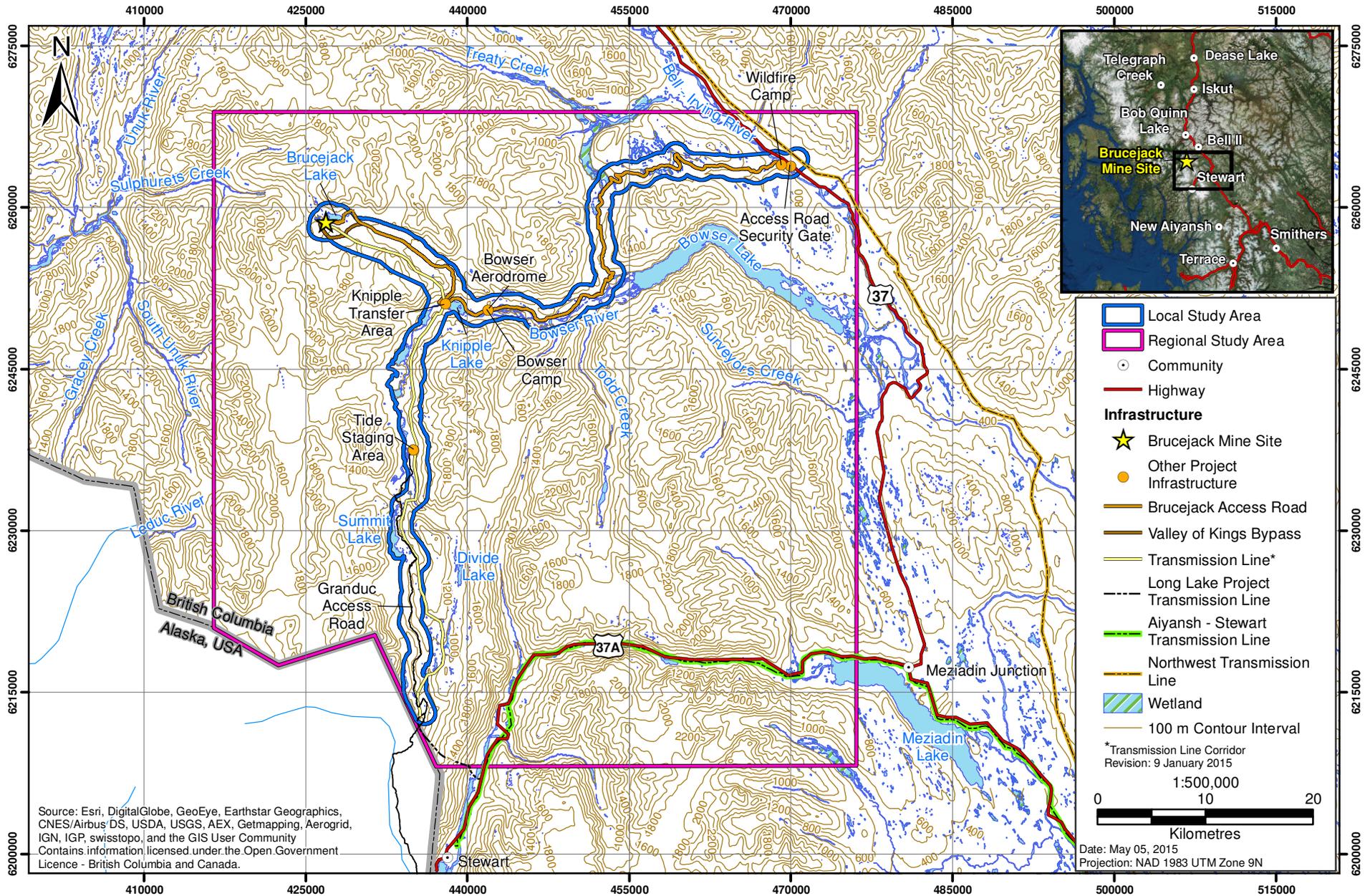
There are four archaeological sites documented in the Archaeology Branch's Archaeological Site Inventory database which are located in the Project's LSA, within 1,000 m of the planned work zone. These sites, their general locations, and their protection status are summarized in Table 5.1-1. Two of these sites, HbTm-2 and HcTn-1, have been designated as Legacy Sites by the Archaeology Branch and are no longer protected by the HCA; they will not be discussed further. HbTm-1 and HcTk-1 are the only known archaeological sites protected by the HCA which fall within 1,000 m of the planned work zone.

**Table 5.1-1. Archaeological Sites within the Local Study Area**

Archaeological Site	Antiquity	Site Type	General Location	Overall Site Significance Evaluation	Distance to Closest Project Component	Protection Status and Legislation
HcTk-1	Pre-contact	Culturally Modified Tree	Brucejack Access Road	Low	15 m	Protected by the HCA
HbTm-1	Pre-contact	Prehistoric Lithic Scatter	Summit Lake	Low	453 m	Protected by the HCA
HbTm-2	Recent Historic	Aircraft Wreckage (associated with a movie production)	Summit Lake	Low	525 m	Legacy Site - Not protected by the HCA
HcTn-1	Pre-contact	Prehistoric Lithic Scatter	Brucejack Lake	Moderate	603 m	Legacy Site - Not protected by the HCA

Figure 5-1

Regional and Local Study Areas for Heritage Resources in the Brucejack Gold Mine Project



#### 5.1.1.1 HbTm-1

Archaeological site HbTm-1 is approximately 525 m west of the Brucejack Transmission Line, and approximately 165 m from the Granduc Access Road between the road and Summit Lake. The site is located outside the proposed construction footprint and therefore no direct effects are anticipated. The site may be subject to potential indirect effects due to increased human presence during the installation of the transmission line and associated towers and use of the Granduc Access Road; therefore, the following mitigation measures have been developed:

- the site area will be marked as a “No Work Zone” on construction maps;
- the site will be inspected periodically to determine if impacts have occurred; and
- if, due to changes to the footprint, direct impacts are anticipated, or monitoring identifies impacts from increased human presence, mitigation measures will be required (see Section 5.1.4).

#### 5.1.1.2 HcTk-1

Archaeological site HcTk-1 is a CMT located approximate 15 m from the centreline of the Brucejack Access Road. To protect HcTk-1 from effects associated with use and maintenance of the Brucejack Access Road during Operation, continued avoidance of the site is recommended. In addition, the area should be marked as a “No Work Zone” on construction maps and the trees marked/flagged as such.

Continued avoidance of the site is recommended. If avoidance is not possible and/or if the trees become a safety hazard, a site alteration permit issued under Section 12 of the HCA would be required (see Section 5.1.4). Issuance of a Section 12 Site Alteration Permit may require that additional study at HcTk-1 be conducted.

### 5.1.2 *Mitigation Measures for As-yet Unknown Archaeological Sites*

During the lifetime of the Project, additional archaeological sites may be discovered while conducting activities associated with the Project. These sites may be discovered through Archaeological Impact Assessments (AIAs) carried out for revisions to the planned work zone or through chance finds during construction, operation, and closure. Mitigation measures for currently unknown archaeological sites, if discovered, are discussed below.

#### 5.1.2.1 Revisions to Planned Work Zone during Construction, Operation, and Closure

Any revisions to the planned work zone that have not been previously subject to an AIA will be assessed to determine if additional archaeological studies, Archaeological Overview Assessments, or AIAs are required. If necessary, AIAs will be carried out under an HCA Heritage Inspection Permit, issued by the Archaeology Branch. Any new archaeological sites within 1,000 m of the planned work zone will be subject to the same level of management and mitigation afforded to the currently known archaeological sites outlined in Section 5.1.

The transmission line corridor has been changed from the route assessed during the original AIAs of the Project area (Jollymore and Walker 2013). An Archaeological Overview Assessment has been conducted and an AIA has been recommended along the revised alignment prior to commencement of Construction phase activities.

### 5.1.2.2 Chance Finds

The Heritage Chance Find Procedure developed for the Project (Appendix A) provides a standard operating procedure should heritage sites not identified during baseline studies be discovered. Pretivm will arrange for site orientation and training of construction personnel (including contractors) involved in new site surficial disturbance, with regards to compliance with the HCA. Training and site orientation will be provided for these construction personnel during their induction, with refresher training provided at the beginning of the second year of construction. Training will also be provided to Pretivm environmental staff, with periodic refreshers during mine life. This training will focus on not disturbing known archaeological sites; the procedures in place for responding to newly identified sites, as outlined in the Project's Heritage Chance Find Procedure; and how to report these sites or observed site impacts. Copies of the Project's Heritage Chance Find Procedure will be kept on site for reference and on file by Pretivm. In general, if personnel suspect archaeological materials or human remains have been discovered they will:

- immediately contact a Pretivm or Contractor Environmental Monitor, Pretivm Environmental Coordinator, or Pretivm Construction Manager to implement a stop work order to reduce/minimize impacts to the site;
- leave the material in place and protect and/or mark the area around the site, and will not disturb or collect any archaeological materials or human remains; and
- report the discovery to the supervisor. The Mine Manager, the Environmental Manager, and the Project Archaeologist will also be notified. The Archaeology Branch and local Aboriginal groups/organizations will be advised of the discovery.

### 5.1.3 General Archaeological Management and Mitigation Strategies

If additional archaeological sites are identified during AIAs carried out for revisions to the footprint or through chance finds, the following general archaeological management and mitigation strategies are recommended. Final mitigation measures will be determined through consultation with the Archaeology Branch.

Note that the stipulations provided herein are generic and would only be activated if required. Specific management and mitigations measures for known heritage resources are described in Section 5.1.1.

Where an archaeological site is located within:

- **0 to 50 m** of ground-altering activities, direct impacts from Construction phase activities with a high potential for adverse impacts are anticipated;
- **50 to 500 m** from Project components, indirect impacts through increased human presence during the Construction, Operation, and Closure phases, with a low to moderate potential for adverse impacts are anticipated; and
- **500 to 1,000 m** from Project components, no impacts are anticipated and therefore are not considered.

Where sites fall within **0 to 50 m** of proposed ground altering activities, the risk of direct impacts from Construction activities is high. Areas within 50 m of archaeological site boundaries will be marked as “No Work Zones” on construction maps. Typically, site avoidance through Project redesign is the recommended management option. If avoidance is not possible, mitigation will be conducted prior to Construction phase activities. Mitigation measures will be determined in consultation with the BC Archaeological Branch and carried out by the Project Archaeologist under an HCA Heritage Investigation Permit. Mitigation may involve detailed mapping, photography, and systematic data recovery through surface collection and controlled excavations of evaluative units if subsurface deposits are present. The steps involved in permitting the alteration of an archaeological site are outline in Section 5.4. If the site will not be directly impacted then Construction Monitoring may be adequate within the “No Work Zone” (Section 6.1.1).

Where sites fall within **50 to 500 m** from Project components, the risk of indirect impacts through increased human presence during the Construction, Operation, and Closure phases is moderate. Sites may be inspected on a case-by-case basis to determine if impacts have occurred. If direct impacts at these sites are anticipated during construction and/or have occurred, mitigation measures will be required (Section 5.1.4). Archaeological site monitoring will occur during Construction phase activities near archaeological sites and/or site boundaries will be flagged or fenced to limit any indirect impacts (Section 6.1.2). Typically, site boundary flagging involves the use of rebar or wooden stakes with snow fencing or another visible barrier, running around the outside of the site boundary. Similarly, brightly coloured stakes installed at intervals around the boundaries of the site can be used if snow fencing or other visible barriers are impractical or constitute a barrier for wildlife. In either case, fencing will be visible above the anticipated snowline, particularly where sites are located adjacent to areas where construction will be undertaken when snow is still present. Caution will be exercised during construction activities near the site. Reporting pertaining to archaeological monitoring activities is described further in Section 7.1.2.1.

Sites which fall within 500 to 1,000 m from Project components are at low risk of direct and/or indirect impacts from construction and/or human presence, unless the planned work zone is revised during the Construction and/or Operation phases.

#### 5.1.4 *Mitigation through Systematic Data Recovery*

Mitigation through systematic data recovery is not currently recommended at any of the known archaeological sites within the LSA. However, if mitigation through systematic data recovery is required due to revisions to the footprint or chance finds a final methodology will be determined in consultation with the Archaeology Branch. The work will be carried out by a Professional Archaeologist under an HCA Section 14 Investigation Permit.

In order to impact an archaeological site the following steps are required.

1. Issuance of an Archaeological Investigation Permit under Section 14 of the HCA, by the Archaeology Branch.
2. Conduct the field investigations during snow-free conditions required to satisfy the provisions of the Section 14 Archaeological Investigation Permit.

3. Complete the permit report including recommendations to the satisfaction of the Archaeology Branch.
4. Apply for a Site Alteration Permit under Section 12 of the HCA.
5. Upon reception of the Section 12 Site Alteration Permit, impacts may proceed subject to any conditions stipulated in the permit.

All of the permit applications and approvals include an allowance by the Archaeology Branch for Aboriginal input and comments. Approval for impacts to archaeological sites is given, or not given, at the sole discretion of the Archaeology Branch. The process leading to a decision on issuance of a Site Alteration Permit generally takes at least one year to complete and therefore should be scheduled to begin well in advance of the Construction phase. From both an archaeological and permitting perspective, avoidance of a site is usually the preferred approach.

## 6 ENVIRONMENTAL MONITORING

This section describes how and when site monitoring will take place at the previously identified site (HbTm-1), as well as the use of the Project's Heritage Chance Find Procedure (Appendix A) for new site discoveries.

### 6.1 ARCHAEOLOGICAL MONITORING

This section described construction monitoring carried out by an archaeologist under an HCA Heritage Inspection Permit (Section 6.1.1) and archaeological site monitoring carried out by an Environmental Monitor (Section 6.1.2).

#### 6.1.1 *Construction Monitoring*

If work is to occur within the "No Work Zone" around an archaeological site, an archaeologist will be present to communicate and work with operations personnel to ensure that unanticipated impacts to the site do not occur. This work will be carried out under an HCA Section 14 Heritage Inspection Permit by a qualified archaeologist. The archaeologist will examine soils being excavated and, should archaeological materials be encountered during monitoring activities, all work will cease in the immediate area of the find and the Archaeology Branch will be notified to determine next steps.

#### 6.1.2 *Archaeological Site Monitoring*

If construction activities are between 50 to 100 m of archaeological site boundaries, an Environmental Monitor will be present or flagging/temporary fencing will be installed to serve as a visible barrier. Prior to the start of planned work activities, known archaeological sites within 100 m of a planned work zone will be located by an Environmental Monitor and a First Nations representative using available GPS coordinates and Project construction maps. The site will be checked to confirm that it is intact and then fenced or flagged to create a visible barrier. Upon completion of work, the site will be checked again to confirm that the site remains intact and was unaffected by work activities. Flagging/fencing will also be removed at this time to avoid drawing unnecessary attention to the archaeological site. The exception to the removal of fencing/flagging will be for a site within close proximity to an active Project area (i.e., known CMT along the Brucejack Access Road). In this case, fencing/flagging will be checked annually by the road maintenance crew to ensure it is still in place and visible.

Should impacts be observed at known archaeological sites, the Project Archaeologist and the Archaeology Branch will be contacted and notified of the impacts. Post-impact mitigation plans will be developed in consultation with the Archaeology Branch and local Aboriginal groups/organizations on a case-by-case basis.

### 6.2 PERFORMANCE MONITORING

Once a site has been flagged/fenced, it will be visited during and after construction activities to determine if impacts have occurred. While fencing is in place Environmental Monitors will inspect and maintain these flagged/fenced boundaries on an annual basis.

## 7 REPORTING AND RECORDING

### 7.1 REPORTING

#### 7.1.1 *Compliance Reporting*

This section details the reporting requirements for activities carried out under the HCA.

##### 7.1.1.1 **Archaeological Impact Assessment Reporting**

For archaeological work conducted under a Section 14 Inspection Permit, a final permit report will be prepared as per the *British Columbia Archaeological Impact Assessment Guidelines* (Archaeology Branch 1998).

##### 7.1.1.2 **Mitigation Reporting**

For currently unknown archaeological sites which are discovered within 0 to 50 m of Project impacts, mitigation will be conducted prior to construction (see Section 5.3.1). In this case, BC Site Inventory Forms must be updated detailing the mitigation measures and submitted to the Archaeology Branch for inclusion in the Archaeology Branch's Archaeological Site Inventory database.

If mitigation is required and completed under an HCA Heritage Investigation Permit provided by the Archaeology Branch, reporting relating to the mitigation will be completed and will meet the submission date and be provided to Aboriginal groups as outlined in the permit. Approval to proceed in the area of the site is given by the Archaeology Branch, to allow for work to be conducted within the site boundaries under a Section 12 Site Alteration Permit. If work proceeds under a Site Alteration Permit, a report will be submitted to the Archaeology Branch, outlining the work carried out within the site boundaries.

##### 7.1.1.3 **Construction Monitoring Reporting**

Construction monitoring will occur if avoidance of the "No Work Zone" is not feasible. This will be done under an HCA Heritage Inspection Permit and will be included in a final permit report prepared as per the *British Columbia Archaeological Impact Assessment Guidelines* (Archaeology Branch 1998). Details on the location, the extent of impacts, and the results of the monitoring will be included in the Permit Report.

##### 7.1.1.4 **Archaeological Site Monitoring**

Pretivm will work in collaboration with the Project Archaeologist and Environmental Monitor to coordinate archaeological site monitoring and site inspection, as required. If the monitoring activities outlined in Section 6.1.2 identify impacts to an archaeological site, the results will be summarized in an Archaeological Site Monitoring Report to be provided to the Project Archaeologist and the Archaeology Branch.

### 7.1.2 *Incident Reporting*

Pretivm will work in collaboration with the Project Archaeologist to coordinate the documentation of chance finds or impacts to archaeological sites. Pretivm will maintain documentation regarding archaeological monitoring and any chance finds which may be discovered during the course of the Construction and Operation phases, and will report any impacts to archaeological sites to the Project Archaeologist and the Archaeology Branch (see Section 5.3.2 and Appendix A).

The Environmental Monitor will document, by means of photographs and field notes, the type of construction and disturbance occurring near a site, weather conditions, personnel present, and other pertinent details.

Chance finds will be reported on using the Heritage Chance Find Procedure and will involve internal reporting to Pretivm Management, the Project Archaeologist, and the Archaeology Branch.

## 7.2 **RECORD KEEPING/TRACKING**

The Environmental Monitor will document, by means of photographs and field notes, the type of construction and disturbance occurring near a site, weather conditions, personnel present, and other pertinent details. It is imperative that detailed field notes are recorded during monitoring activities. This information will be summarized in an Archaeological Site Monitoring Report to be provided to the Project Archaeologist and the Archaeology Branch if an archaeological site is impacted.

### 7.2.1 *Field Monitoring Data*

The following data will be collected during field monitoring and may be required for inclusion in compliance reports:

- site photographs;
- UTM's for any disturbances;
- details of any actions taken to protect the archaeological sites; and
- recommendations for any changes to the protective measures, if required.

### 7.2.2 *Continuous Improvement, Follow-up, and Adaptive Management*

The Plan will be reviewed and updated on an as-needed basis as the Project proceeds through detailed design, Construction, Operation, Closure, and Post-closure.

### 7.2.3 *Incident Response Records*

Archaeological sites discovered during Project activities will be reported through the Heritage Chance Find Procedure.

#### 7.2.4 *Permit Database and Amendments*

Previous and current AIA permits issued under the HCA for the Project include:

- 2010-0255 (closed);
- 2011-0245 (closed);
- 2013-0174 (closed); and
- 2014-0277 (active).

Additional permits or permit amendments will be added on an as-needed basis.

## 8 REFERENCES

1996. *Heritage Conservation Act*, RSBC. C. 187.

2004. *Cremation, Interment, and Funeral Services Act*, SBC. C. 35.

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ERM Rescan. 2014. *Brucejack Gold Mine Project: Application for an Environmental Assessment Certificate / Environmental Impact Statement*. Prepared for Pretium Resources Inc. by ERM Consultants Canada Ltd.: Vancouver, BC.

Jollymore, K., and D. Walker. 2013. *Brucejack Gold Mine Project: Archaeological Impact Assessment, Final Report, Heritage Inspection Permit 2011-0245*. Prepared for Pretium Resources Inc. by Rescan Environmental Services Ltd.: Vancouver, BC.

# *Appendix A*

## *Brucejack Gold Mine Heritage Chance Find Procedure*

# BRUCEJACK GOLD MINE

## Heritage Chance Find Procedure

### 1 INTRODUCTION

This Heritage Chance Find Procedure has been developed for the Brucejack Gold Mine Project by ERM Consultants Ltd. (ERM) for Pretium Resources Inc. (Pretivm) to be used by Project personnel during ground altering activities.

The purpose of this document is to provide guidance for Project personnel who believe they may have discovered archaeological, historical, or paleontological materials or human remains during Project activities. Procedures outline best practices for protecting and reporting heritage chance finds and the protocols to follow in such cases.

This procedure will be included as part of the site orientation and training program during the Construction phase for personnel involved in new site surficial disturbance, so that they are trained and informed regarding compliance with the *Heritage Conservation Act* (1996) and the use of this procedure. Training and site orientation will be provided for these construction personnel during their induction, with refresher training provided at the beginning of the second year of construction. Training will also be provided to Pretivm environmental staff, with periodic refreshers during mine life. This training will outline relevant legislation in place to protect heritage resources and will focus on the protection of known heritage sites (including protected archaeological, historic, and paleontological sites), the procedures in place for responding to newly identified sites, and how to report these sites or observed site impacts. Copies of this document will be kept on-site for reference and on file by Pretivm. The use of this procedure will promote the preservation of archaeological data while minimizing disruption of project schedules.

#### 1.1 RELEVANT LEGISLATION

In British Columbia, the *Heritage Conservation Act* (1996) protects all heritage sites, whether on Provincial Crown or private land, that predate AD 1846. Burial and rock art sites are protected regardless of age. Burials and gravesites are protected in British Columbia by the *Cremation, Interment, and Funeral Services Act* (2004). Additionally, provincial legislation also protects significant paleontological sites (i.e., fossils).

A permit is required for any subsurface investigation of a heritage site or investigation with the intent to locate a site. The BC Archaeology Branch is the provincial government agency responsible for administering the *Heritage Conservation Act*, issuing permits, and maintaining a database of recorded heritage sites in the province. Disturbance and/or removal of artifacts from a site may result in penalties.

## 1.2 REMEDIES AND PENALTIES

The *Heritage Conservation Act* provides for heritage inspection or investigation orders, temporary protection orders, and civil remedies and penalties to limit contraventions. These powers provide:

- the Province with the ability to inspect a site or halt work to prevent site alteration; and
- the Courts with the ability to issue an injunction to restrain contravention of the Act or, where there has been a breach of the Act, impose penalties of not more than:
  - a fine of \$50,000 and 2 years imprisonment for an individual;
  - a fine of not more than \$1,000,000 for a corporation; or
  - a fine of \$50,000 or 2 years imprisonment for an employee, officer, director or agent of the corporation.

## 1.3 HERITAGE SITE TYPES

In British Columbia, the material culture of the earliest cultures can be found on today's landscape which can relate to resource gathering, habitation, tool making, and ritual and ceremonial sites. Such sites can be discovered during Project activities and may become exposed as a result of cut-banks, excavation, eroding shorelines, or melting glacial ice. Some site types known to be present in northwest BC include:

- Culturally Modified Trees (CMTs) such as bark stripping, blazes, and removal of planks;
- rock art, including petroglyphs and pictographs;
- surface features such as cache pits, pit house depressions, and rock cairns;
- stone artifacts and the waste material from stone tool manufacture (flakes/chipped stone). Such artifacts can be found on the surface or subsurface and are often made from material such as obsidian, chert, or basalt;
- historic cabins related to significant historic events; and
- paleontological fossil sites.

## 2 HERITAGE CHANCE FIND PROCEDURE

If you believe that you may have encountered archaeological, historical, or paleontological materials, follow the procedure below:

- Immediately contact a Pretivm or Contractor Environmental Monitor, Pretivm Environmental Coordinator or Pretivm Construction Manager to implement a stop work order, to **stop** all construction activities in the vicinity of the find to avoid damaging the site.
- **Do not disturb or remove any heritage material you may encounter.** Take a photo instead.
- Report your discovery to your supervisor. If unavailable, contact the Pretivm Environmental Coordinator or Pretivm Mine Manager to obtain further instructions.
- If possible, isolate and protect the area by hanging flagging tape, etc.
- Note the location of the find (GPS coordinates/sketch map/etc.), and leave the find in place.
- Prepare an initial Chance Find Reporting Form (see below) and provide this to the Mine Manager, who will also provide a copy to the Environmental Manager.
- Pretium Resources Inc. will contact the Project Archaeologist.

Once the Initial Chance Find Reporting Form has been submitted:

1. The Project Archaeologist will assess the potential significance of the find. If it is determined to be archaeological in nature, the Archaeology Branch will be contacted, as well as, the appropriate local First Nation.
2. The Project Archaeologist, in consultation with the Archaeology Branch, will determine what further steps are required.
3. If additional work is required, an investigation will be carried out under a Heritage Inspection Permit.
4. The Project Archaeologist will work with Pretium Resources Inc. and the Mine Manager to prepare instructions to recommence work in the area.
5. A site form and permit report will be submitted to Pretium Resources Inc., the Archaeology Branch, and local First Nations.

### 3 FOUND HUMAN REMAINS PROCEDURE

If you believe that you have discovered human remains, follow the procedure for *Found Human Remains*<sup>1</sup>, summarized below:

1. Immediately contact a Pretivm or Contractor Environmental Monitor, Pretivm Environmental Coordinator or Pretivm Construction Manager to implement a stop work order, to **stop** all construction activities in the vicinity of the find to avoid damaging the site.
2. **Do not disturb any possible human remains that you encounter.** Treat it like a crime scene.
3. Report your discovery to your supervisor. If unavailable, contact the Pretivm Environmental Coordinator or Pretivm Mine Manager to obtain further instructions.
4. Pretium Resources Inc. will contact the Project Archaeologist.

Once the initial report has been submitted:

1. The Coroner's Office and local policing authority will be notified as soon as possible by the Project Archaeologist.
2. The Coroner's Office will determine whether the matter is of contemporary forensic concern.
3. If the Coroner's Office determines the reported remains are not of forensic concern, the Archaeology Branch will attempt to facilitate disposition of the remains.
4. If a cultural affiliation for the remains can be reasonably determined, the Archaeology Branch will attempt to contact an organization representing that cultural group.
5. If remains are determined to be of aboriginal ancestry, the Archaeology Branch will attempt to contact the relevant First Nation(s).
6. Generally, if remains are still buried and are under no immediate threat of further disturbance, they will not be excavated or removed.
7. If the remains have been partially or completely removed, the Archaeology Branch will facilitate disposition.

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<sup>1</sup> This is based largely on the Archaeology Branch's Found Human Remains Procedure with some changes to reflect Project specific conditions. Source: [http://www.for.gov.bc.ca/archaeology/policies/found\\_human\\_remains.htm](http://www.for.gov.bc.ca/archaeology/policies/found_human_remains.htm) (accessed December 2013).

## 4 CONTACTS

### **ERM's Archaeology Department**

Lisa Seip, M.A., RPCA, CAHP  
Manager of Archaeology and Cultural Heritage

604-689-9460  
lisa.seip@erm.com

### **BC Archaeology Branch**

Doug Glaum  
Manager - Archaeology Branch

250-953-3357  
doug.glaum@gov.bc.ca

### **Pretium Resources Inc.**

George Friesen  
Mine Manager

Local 127

Max Holtby  
Director Permitting

604-558-1784

### **RCMP - Stewart**

250-636-2233

