Denison Mines Corp.

Wheeler River Operation

Pre-Clearance Wildlife Monitoring Plan

Document #49

Version 1

April 2025

Approval for Use

Version	Date	Description of Activities	Author	Reviewer	Approver
1	April 2025	Initial Draft for CNSC Review		Sarah Benson Ryan Nagel	Janna Switzer

Revision History

Version	Date	Description of Revision
1	April 2025	Initial Draft for CNSC Review

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1 Introduction

1.1 Background Information

The purpose of the *Pre-Clearance Wildlife Survey Monitoring Plan* (the Plan) is to support the *Biodiversity Management Plan* (BdMP; Denison Mines, 2024b) for the Wheeler River Operation (the Operation) prior to site clearing/disturbance.

Wildlife species and their habitats are protected in Saskatchewan under a combination of provincial and federal legislation including:

Provincial Acts:

- *The Wildlife Act, 1998* and its Regulations
- *The Wildlife Habitat Protection Act, 1983*
- *The Fisheries (Saskatchewan) Act, 2020*
- *The Water Security Agency Act, 2005*
- *The Environmental Management and Protection Act, 2010*
- *The Environmental Assessment Act*

Federal Acts:

- *Species at Risk Act, 2002*
- *Canadian Environmental Protection Act, 1999*
- *Fisheries Act, 1985*
- *Migratory Birds Convention Act, 1994*

1.2 Scope

This Plan focuses on presenting the potential methods and timing of pre-clearance wildlife surveys (PCWS). A brief overview of this information, as well as the roles and responsibilities of individuals working for or on behalf of Denison, is presented in the BdMP.

The Plan applies to the period prior to site clearing for construction and focuses on the Project footprint area (i.e., the area to be cleared).

Error! Reference source not found. The Plan applies to individuals working for or on behalf of Denison, including employees and contractors, which have a role in implementing the monitoring outlined in this Plan. Denison will ensure that suitably qualified personnel are used for all wildlife surveys in accordance with Denison's *Training Management Program*. Surveys will be completed by qualified professional biologists. In their capacity as professional biologists, they will refer to available guidance, such as the Saskatchewan species detection survey protocols, to develop details of the surveys (e.g., selecting the appropriate time of day for the survey).

Monitoring will focus on terrestrial wildlife and will include:

- terrestrial wildlife (amphibians, small mammals, furbearers and ungulates, and birds), and
- species at risk.

1.3 Objectives

The objective of this Plan is to establish the requirements and methods of pre-disturbance clearance surveys to be completed to identify site-specific habitat features in the Project Footprint. If features are identified, appropriate setbacks and/or timing windows will be implemented.

1.4 Error! Reference source not found.Overview

Surveys will be completed within the site footprint and buffer area and will minimize impacts to wildlife and wildlife habitat in the area.

1.5 Monitored Species

The PCWS will focus on methods and timing of SAR wildlife species as these methods and timing align with other wildlife species from the Project area that do not require specific mitigation measures.

Species at risk that could potentially occur in the Terrestrial RSA are presented in **Table 1-1**. Existing information, mitigation measures and potential impacts for these species were discussed in the EIS and its supporting documents. Baseline information is also summarized in the BdMP. It should be noted that the SAR identified below have not been specified as requiring a Project-specific management or compensation plan. The exception to this is for Woodland Caribou for which a Woodland Caribou Management Plan is being prepared.

Table 1-1. Wildlife Species At Risk Considered in the Wheeler River Project EIS

Common Name	Scientific Name	Provincial Status ǂ	SARA Schedule 1 Designation ǂ
Nine-spotted Lady Beetle	*Coccinella ovemnotata*	S4	Endangered
Transverse Lady Beetle	*Coccinella transversoguttata*	S4	Special Concern
Yellow-banded Bumble Bee	*Bombus terricola*	S4	Special Concern
Northern Leopard Frog	*Lithobates pipiens*	S3	Special Concern (Western Boreal/Prairie populations)
Little Brown Myotis	*Myotis lucifugus*	S4B, S4N	Endangered
Northern Myotis	*Myotis septentrionalis*	S3	Endangered
Wolverine*	*Gulo gulo*	S2	Special Concern
Woodland Caribou*	*Rangifer tarandus*	S3	Threatened (Boreal population)
Bank Swallow	*Riparia riparia*	S4B, S5M	Threatened
Barn Swallow	*Hirundo rustica*	S4B	Threatened
Common Nighthawk*	*Chordeiles minor*	S4B	Special Concern
Horned Grebe	*Podiceps auritus*	S4B	Special Concern (Western population)
Olive-sided Flycatcher*	*Contopus cooperi*	S4B	Special Concern
Rusty Blackbird*	*Euphagus carolinus*	S3B, SUN	Special Concern
Short-eared Owl*	*Asio flammeus*	S3B, S2N	Special Concern
Yellow Rail*	*Coturnicops noveboracensis*	S3B	Special Concern

* Included as a Key Indicator of species at risk VCs in the EIS.

1.5.1 Surveys Targeting Species at Risk

Pre-clearance SAR survey methods, including survey target areas and timing, are presented in Appendix 9-D of the EIS.

Table 1-2 presents an adaptation to Table 4-1 in Appendix 9-D, which groups survey techniques into the behaviour or season that the survey aims to target. It also includes monitoring information for Nine-spotted Lady Beetle, Transverse Lady Beetle, and Yellow-banded Bumble Bee. Although Table 1-2 indicates actions to be undertaken if SAR are detected, additional species-specific mitigation measures to be followed are presented in the EIS (Appendix 9-D) and its supporting documents. It is noted that surveys targeting SAR as well as general visual encounter surveys, may also detect other terrestrial wildlife species groups or habitat, in which case, the appropriate monitoring and mitigation measures for those species should be implemented.

Table 1-2. Species at Risk Pre-clearance Survey Methods

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
Nine-spotted Lady Beetle	Not observed	Summer	Habitat generalist. Occurs in agricultural areas, suburban gardens, parks, coniferous forests, deciduous forests prairie grasslands, meadows, riparian areas, and isolated natural areas.	Terrestrial RSA	Net sweeps, visual surveys, pan traps, beach drift surveys	Summer	No direct conservation actions are defined for the Nine-Spotted Lady Beetle. However, the proposed mitigation measures outlined in the EIS, particularly those designed for VCs Soil and Organic Matter / Peat and Vegetation and Ecosystems, adequately and appropriately address potential for adverse effects on Nine-Spotted Lady Beetle, primarily related to limiting the loss and/or disruption of suitable habitat.	COSEWIC (2016a), Linton and McCorquodale (2018), Denison Mines (2024a)
Transverse Lady Beetle	Not observed	Summer	Habitat generalist. Occurs in agricultural areas, suburban gardens, parks, coniferous forests, deciduous forests prairie grasslands, meadows, riparian areas, and isolated natural areas.	Openly vegetated areas that support aphid populations	Net sweeps, visual surveys, pan traps, beach drift surveys	Summer	No direct conservation actions are defined for the Transverse Lady Beetle. However, the proposed mitigation measures outlined in the EIS, particularly those designed for the	COSEWIC (2016b), Linton and McCorquodale (2019), Denison Mines (2024a)

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
							VCs Soil and Organic Matter / Peat and Vegetation and Ecosystems, adequately and appropriately address potential for adverse effects on Transverse Lady Beetle, primarily related to limiting the loss and/or disruption of suitable habitat.	
Yellow-banded Bumble Bee	Not observed.	Summer	Habitat generalist. Uses a variety of habitats, including meadows within coniferous, deciduous, and missed-wood forests and woodlands; taiga; prairie grasslands; riparian zones; urban parks, gardens, and agricultural areas; and along roadsides. Consumes nectar and pollen from many different flowering plants.	Terrestrial RSA	Bumble bee point survey	Late summer	No direct conservation actions are defined for the Yellow-banded Bumble Bee. However, the proposed mitigation measures outlined in the EIS, particularly those designed for VCs Soil and Organic Matter / Peat and Vegetation and Ecosystems, adequately and appropriately address potential for adverse effects on Yellow-banded Bumble Bee, primarily related to limiting the loss and/or disruption	COSEWIC (2015), ECCC (2022), Denison Mines (2024a), Xerces Society (2024)

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
							of suitable habitat.	
Northern Leopard Frog	Not observed	Breeding	Breed in the shallow, warm waters of a variety of wetlands and slow-moving waters of streams and rivers.	Wetlands / water / riparian areas / wet areas / moist areas / scrublands / bogs/ fens.	Auditory call surveys	Apr 20 to Jun 10	Pond setback distances: • Low: 10 m • Med: 200 m • High: 500 m	MOE (2017)
		Non-breeding / Foraging	From winter sites, adult frogs travel up to 1.6 km to breed. After breeding, adults and sub-adults may disperse up to 8 km from breeding ponds. In the summer, forages in riparian or moist upland habitats, including meadows, pastures, scrublands, riparian corridors, and drainage or irrigation ditches. Do not typically utilize areas that are heavily wooded.		Visual searches for egg masses or frogs	Snow / ice-free early spring and spring season		
Little Brown Myotis and Northern Myotis	34 ultrasonic detections of Little Brown/Northern Myotis	Roosting & foraging	Large snags and tree cavities in old growth forest stands provide maternity roosts and day roosts for both species. Buildings are also used. Foraging habitat in proximity to roosting sties is also an important factor in roost selection.	Roosting habitat: Treed areas with the largest diameter and/or older trees. Focus on older forest, or areas with large snags in younger forest within the project footprint (majority is regenerating forest 1-5m).	Daytime visual search of trees and potential roost sites. Systematic meandering search of areas to be cleared during active bat season. Focus on searching for roost features (snags, cracks, stumps, cavities, bark peeling) and	May to Sept	Should a roosting bat be discovered the area will be afforded protection from clearing for 24 hours and re-surveyed. The area will only be cleared if no bats are discovered. A 100 m buffer will be given to nursery roots and 50 m to daily	COSEWIC (2013); Resources Information Standards Committee (2022), Government of Alberta (2010)

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
				Foraging habitat: Treed areas in proximity to clearings, wetlands and open water.	bat sign (e.g., guano). Ultrasonic detection can also be used.		roosting bats. If many roosting bats are recorded compensation will be considered (e.g., bat houses).	
						Year-round	Roost/foraging site: • Low: 100 m • Med: 500 m • High: 500 m	MOE (2017)
Wolverine	Not observed	All seasons	Use wide variety of forested and vegetation associations. Habitats must have an adequate year-round food supply, mainly consisting of smaller prey, like rodents and Snowshoe Hares, and the carcasses of large ungulates, like Moose, Caribou, and Muskox.	All areas of project activity.	Winter den searches	Snow cover months	Setback of 250m when occupied and 100m when unoccupied.	COSEWIC (2014a); BCER (2024)
		Breeding	Females den under snow-covered rocks, logs or within snow tunnels. Wolverines reproduce in areas where snow cover persists at least into April.					
Woodland Caribou	Observed	All seasons	Woodland caribou may occupy all potential project areas but prefer forests greater than 40 years of age.	All areas of project activity.	Visual search to ensure no caribou are in the area. Ongoing vigilance.	Year-round	If caribou are in the area cease operations until they are clear of the area.	MOE (2021)
Rusty Blackbird	Not observed	Breeding	Rusty blackbird primarily nests in small conifers, predominantly spruce. In Canada, nests have also been found in Balsam Fir, Eastern White Cedar, Paper Birch, Balsam Poplar, Red Maple, Pin Cherry, emergent sedges,	All habitat with spruce, white birch and balsam poplar. Very limited suitable (spruce) habitat within project footprint.	Visual search for nests.	May 1 to Jul 31	A 75 m buffer around coniferous bogs, fens and other wetlands suitable for Rusty Blackbirds	EC (2015), Odsen and Pyper (2019), Wildlife Division (2020)
							Nest setbacks of: • Low: 50 m	MBCDC (2021)

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
			cattails, and on the ground on a beaver dam. Note: The site only has spruce, birch and poplar.				• Med: 150 m • High: 300 m	
Yellow Rail	Not observed	Breeding	Shallow wetlands and other wet areas with grass-like vegetation. Breed in wetlands, generally dominated by short, fine-stemmed, herbaceous vegetation, as well as other graminoid vegetation. Breeding habitats may have ≥ 50 cm of standing water. Typically nesting sites are < 15 cm deep.	Using available mapping conduct daytime Ecosite verification and stratify surveys in appropriate habitat only. Based on available mapping, no suitable habitat within project footprint.	Triplicate nocturnal (23:00-03:00) call-playback surveys spaced at least 4 days apart. Or use Autonomous Recording Units throughout the breeding season.	May 1 to Jul 15.	Breeding bird setbacks of: • Low: 100 m • Med: 150 m • High: 350 m	EC (2013), MOE (2014b, 2017)
Bank Swallow	Not observed	Breeding	Breed in a wide variety of low elevation (< 900 m), natural and anthropogenic habitats, including: lake and ocean bluffs; stream and riverbanks; sand and gravel pits; roadcuts; and piles of sand, topsoil, sawdust, coal ash, and other materials. Nest burrows are nearly always in a vertical or near-vertical bank (range: 76-105° slope). In some cases, Bank Swallows have nested in drainpipes and in structures designed and built specifically for nesting Bank Swallows.	Survey key habitat features identified as important.	Visual survey during timing window	May 15 to Jul 31	Nest colony setbacks of: • Low: 50 m • Med: 150 m • High: 300 m	MBCDC (2021), COSEWIC (2014b)

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
Barn Swallow	Four visual/auditory detections	Breeding	Nest on horizontal and vertical structures, including natural sites, like cliffs and caves and human-made structures, like barns, bridges, and culverts. The nesting substrate must be rough, or have a ledge or projecting objects, to provide additional structural support to the nest. Nest sites must provide access to open areas with an abundance of aerial insects; features such as wetlands, waterbodies, watercourses, meadows, grazed grassland, and farmland are preferred. Proximity to a waterbody or moist area with a supply of wet mud is needed to facilitate nest construction.	Open areas in proximity to water. All buildings and man-made structures.	Visual survey during timing window	May 15 to Sept 30	Nest site setback distances: • Low: 50 m • Med: 100 m • High: 100 m	MBCDC (2021), COSEWIC (2021a)
Common Nighthawk	Two nests, five visuals, and 76 auditory/visual detections	Breeding	Nests are typically in open sites with dry, well-drained substrates that will not overheat and that have shade nearby for young to shelter from the sun and predators. Nest sites include forest clearings, bare patches in grassland, gravel pits, outcrops, road or rail sides, and, rarely, fenceposts.	All upland habitat.	Call-playback survey	May 1 to Aug 31	Breeding bird setback distances: • Low: 0-50 m • Med: 100 m • High: 200 m	MOE (2017), Government of Saskatchewan (2020e)

Species	Baseline Survey Results	Behaviour/ Season	Important Habitat and Needs	Survey Target Areas	Survey Technique	Survey Timing	Action if Species Detected [a]	Information Source
Horned Grebe	One observation	Breeding	More than 90% of the Horned Grebes in North America breed in ponds and lakes in western and northern Canada.	Water bodies within the project area.	Visual searches	May 1 to Sept 15	Nest site setback distances: • Low: 100 m • Med: 200 m • High: 400 m	MBCDC (2021)
Olive-sided Flycatcher	Fourteen observations	Breeding	Prefer open coniferous or mixed coniferous forests, often located near water / wetlands with tall snags or trees. Prefers post-burn areas or wetlands that create open habitats for the species to forage. High densities can be supported by mature conifer stands within patchy landscapes influenced by natural disturbance.	All conifer and/treed upland areas.	Call-playback survey	May 1 to Aug 31	Breeding bird setback distances: • Low: 0-50 m • Med: 150 m • High: 300 m	MOE (2017), EC (2016)
Short-eared Owl	Not observed	Breeding	Nesting generally occurs in large open areas. Requires a minimum area of about 50-100 ha, consistent with the mean territory size of 82 ha reported in Manitoba. In the north, nests are primarily in tundra (Sinclair et al. 2003), and sometimes beside a small shrub that provides cover.	Open upland and lowland areas with no trees and some shrub cover.	Call-playback survey	March 25 to Aug 1	Breeding bird setback distances: • Low: 100 m • Med: 300 m • High: 500 m	MOE (2017), COSEWIC (2021b), Government of Saskatchewan (2020f)

[a] Setback distances set by the MOE (2017) and the MBCDC are grouped into Low, Medium (Med), and High disturbance categories. Examples: Low = foot traffic; occasional/infrequent/short-term small vehicle (<1 ton) or ATV use; operating oil or gas wells without flaring; operating pipelines. Med = vehicles >1 ton (gravel, oil, grain); regular/frequent/long-term small vehicle (<1 ton) or ATV use, pipeline construction (diameters <1 foot), operating compressor station or battery without flaring. High = road, battery, or compressor or battery station construction; seismic exploration; drilling rigs; trench-in pipeline; blasting; mines; gravel pit; quarries; forest harvest; rock crushing; asphalt batching; operating compressor station or battery or oil/gas well with flaring; or renewable energy projects.

The MOE (2017) characterizes a breeding bird by: territorial behaviour; calling to competing male, mate or young; singing; courtship displays; carrying food or nest materials etc., and; presence of nest or young found incidentally.

2 Reporting and Communication

The results of PCWS will be reported to the Saskatchewan Ministry of the Environment (Sask ENV), as required, and the CNSC as appropriate. The PCWS report will meet any applicable reporting requirements in the facility licence and/or provincial approvals for the Project.

Communications associated with the WMP with Interested Parties (Indigenous Peoples / Groups, general public groups, other members of the public) are described by the *Public and Indigenous Information Program* (PIIP). The PIIP outlines Denison's policy, principles, and plan to communicate with Indigenous groups and members of the public in support of the development and maintenance of meaningful relationships in relation to the Operation, while also ensuring that information related to the health, safety and security of persons and the environment, and other issues associated with the lifecycle of nuclear facilities are effectively communicated more broadly. Denison's Public Disclosure Protocol is also defined within this Program.

3 References

3.1 Internal

Document Number	Document Name
35	Biodiversity Management Plan
15	Public and Indigenous Information Program
08	Training Management Program

3.2 External

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