

# Cultural Resources Management Plan

As Required By: Mitigation Measures FS-CR-01  
through FS-CR-11, and RC-CR-01

June 2018

**Prepared by:**

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## Monitoring and Reporting Schedule

Task Schedule	Purpose/Description/ Timing	Pre-Mining Period/ Construction Phase			Operations Phase		Closure Phase	
		AN	A	O	AN	A	AN	A
Limit activities between security and perimeter fences (FS-CR-05)	Protect cultural resources	X			X		X	
Cultural resources protection training (FS-CR-06)	Define appropriate activities involving cultural resources	X			X		X	
Tribal access to site (FS-CR-07)	Access for cultural practices/plant collection, with a 5-days' notice	X <sup>1</sup>			X <sup>1</sup>		X <sup>1</sup>	
Tribal access to site FS-CR-08)	Access to sacred sites prior to disturbance, and then with 5-days' notice	X <sup>1</sup>			X <sup>1</sup>		X <sup>2</sup>	
Culturally significant plants (FS-CR-09)	Include species in reclamation work	X <sup>2</sup>			X <sup>2</sup>		X <sup>2</sup>	
Interpretation of cultural investigations (FS-CR-10, MOA IV.D.2-4)	Provide information about studies/exhibits/ presentations, etc.			X <sup>3</sup>				
Synthesis Report (MOA VII)	Prepare synthesis report integrating results of data recovery			X <sup>4</sup>				
Mitigation lands (RC-CR-01)	Include status of land acquisitions and access easements/ restrictions in reporting to Forest Service		X			X		X
Reporting on Mitigation Measures FS-CR-05 through CR-10, including RC-CR-01	To Forest Service		X			X		X

AN = As Needed or with notice; A = Annual; O = Other frequency; X<sup>1</sup> = with 5 days' notice if sites are accessible, X<sup>2</sup> = see *Revegetation and Growth Media Monitoring Plan* (MPO Volume II-v); X<sup>3</sup> = within 18 months of mitigation report finalization but no later than the end of the third production year per MOA; X<sup>4</sup> = 12 months after completion of data recovery reports described in MOA.

## Revision Log

<i>Revision Number</i>	<i>Revision Lead</i>	<i>Purpose of Revision</i>	<i>Revision Date</i>
1	Rosemont	Based on Forest Service review of June 2017 MPO submittal.	March 2018
2	Rosemont	Based on Forest Service review of March 2018 MPO submittal.	June 2018

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# 1.0 PLAN OBJECTIVE AND DESCRIPTION

This *Cultural Resources Management Plan* (Plan) was developed in response to various mitigation and monitoring measures (Mitigation Measures) required in the U.S. Forest Service's (USFS, Forest Service) Coronado National Forest (Coronado, CNF) Final Environmental Impact Statement (FEIS: USFS, 2013a) for the Rosemont Copper Project (Project) concerning cultural issues. This Plan also references requirements in the Memorandum of Agreement (MOA; USFS, 2013b) signed under Section 106 of the National Historic Preservation Act (NHPA) contained in Appendix D of the FEIS, and the following Historic Properties Treatment Plan(s) (HPTP: SWCA, 2014, and EPG, 2015) developed for the Project.

- Environmental Planning Group (EPG): A Historic Properties Treatment Plan for Rosemont Copper Utilities, Pima County, Arizona (dated November 2015)
- SWCA Environmental Consultants (SWCA): Historic Properties Treatment Plan for the Proposed Rosemont Copper Project, Pima County, Arizona (dated December 2014)

Corrections to any of the mitigation measures listed in Appendix B of the FEIS are provided in an Errata (USFS, 2017a). The Record of Decision (ROD; USFS, 2017b) for the Rosemont Project also lists the required mitigation measures.

Appendix B of the FEIS (USFS, 2013a) includes Mitigation Measures FS-CR-01 through FS-CR-11 and RC-CR-01. Mitigation Measure details specifically addressed in the Historic Properties Treatment Plan(s) (HPTP: SWCA, 2014, and EPG, 2015) are summarized here and not addressed further in this Plan. These include:

- **FS-CR-01, Testing and Data Recovery:** The HPTP identifies 82 historic properties within the area of potential effects (APE). The Forest Service, working in cooperation with the proponent (Rosemont Copper Company; Rosemont), must ensure all data recovery activities required by the HPTP are completed before any ground-disturbing activities commence in the vicinity of an affected historic property. Data recovery excavations are recommended at 60 sites and some other action, other than excavation, is recommended at a small number of sites. The 60 sites include 40 prehistoric sites, 18 historic sites, and two sites with both prehistoric and historic components. At 14 of the prehistoric sites and 13 of the 18 historical sites planned for data recovery, additional excavation will supplement data recovery performed during the ANAMAX project.

The HPTP provides the treatments and protocols that will be used to avoid or mitigate adverse effects to the National Register of Historic Places (NRHP)-eligible historic properties within the areas directly and indirectly impacted in the APE and all connected actions, with the exception of Tucson Electric Power's (TEP) transmission line and Rosemont Copper's co-location of the water pipeline outside the CNF boundary (those are discussed in the separate Utilities HPTP and not addressed in the Mine Plan of Operations [MPO]). Data recovery would assess the research domains identified in the HPTP and follow a phased approach. Phase I will consist of mapping each site, collecting artifacts on the site surface, and exploratory investigations to identify the nature and extent of the site or investigate newly recorded or previously unexamined areas within a site. Phase II data recovery will focus on excavating features, recovering human remains, and collecting artifacts and samples required for addressing the research questions identified for each historic property type.

A Staged Data Recovery Plan will be developed to identify specific areas and historic properties that will be affected by ground-disturbing activities as project facilities are constructed in the 18 months of pre-production, and production years 1, 2, 4–6, and 15. The CNF and consulting parties will have 30 days to review the staging plan and to request modifications by Rosemont. Upon acceptance of the plan by the CNF, the CNF will issue a *Notice to Proceed with Phase I Data Recovery* that is specific to each stage

of ground-disturbance.

Consulting tribes will be afforded the opportunity to designate tribal members to participate as members of the archaeological team, as well as tribal monitors during construction. Designated tribal cultural representatives will also be afforded the opportunity to provide cultural sensitivity training required for all field personnel. If requested by a Tribe, the CNF will coordinate with Rosemont to arrange visits to Native American sites by tribal representatives during data recovery investigations.

- **FS-CR-02, Burial Plan Implementation:** The Burial Plan (Chapter 8 of the HPTP) applies to discoveries made during intentional excavation of sites during archaeological data recovery and to unanticipated discoveries during project construction, operation, or reclamation. The plan identifies procedures for respectful treatment of human remains, funerary objects, objects of cultural patrimony, and sacred objects, regardless of land ownership, from initial discovery through repatriation. The burial plan incorporates the requirements of a Native American Graves Protection and Repatriation Act (NAGPRA) Plan of Action for Forest Land and a Burial Agreement for private land. The final Burial Plan signed by the Forest Supervisor and the Burial Agreement, developed by the ASM in consultation with tribes, the proponent (Rosemont), the CNF, and the archaeological consultant, will be attached to the HPTP, and their approved procedures subsume those outlined in the HPTP. The protocol requires immediate protection, notification, and determination of cultural affiliation, and agreed upon measures for treatment and a timely and secure transfer of custody.
- **FS-CR-03, Curation of Collections:** Collections include all materials generated as a result of the investigations, including items such as artifacts, field notes, photographs, geographic information systems (GIS) data, interviews, and copies of the final project reports and public deliverables. All collections generated by activities prescribed in the HPTP for the Rosemont Copper Project, including archaeological materials from CNF and private lands and data identified through archival and ethnohistorical research, will be curated in perpetuity at a repository that meets the curation standards, with funding from the Project's proponent (Rosemont; Chapter 11 of the HPTP). Copies of all paper records should also be provided to the Tohono O'odham Nation and other tribes, if requested. For collections that derive from private land, Arizona State Museum (ASM) will execute agreements with private landowners to include materials from their lands in the single collection, as part of its requirements for issuing the project-specific permit for archaeological data recovery on those lands. Copies of the catalog for the combined archaeological and archival research will be made available to consulting tribes. No human remains would be curated, including fragments identified after completion of fieldwork; the remains would also be repatriated in accordance with the Burial Plan.
- **FS-CR-04, Unanticipated Discovery Protocol:** The Discovery Plan documents the procedures to be implemented in the event that a cultural resource is encountered during ground-disturbing activities after the mitigation treatments have been completed and the CNF has issued a Notice to Proceed. Discoveries may also occur within or outside the boundaries of known archaeological sites, or in areas where no cultural resources have been previously recorded. For those historic properties that will be directly impacted by project activities, construction monitoring will ensure that any human remains, sensitive cultural items, and significant archaeological features that were missed during data recovery are treated appropriately. Although data recovery excavations are intended to be thorough, it is not feasible to excavate 100 percent of every site. Associated burial areas may be located near, but outside the site boundary that was defined by archaeologists based on surface artifact distributions; i.e., construction monitoring may be required in additional areas.

In the event of a discovery, the procedures outlined in Chapter 9 of the HPTP will be implemented to assure prompt notification of the project archaeologist and construction

foreman and cessation of project activities within 100 feet of the find. The project archaeologist is responsible for assessing the significance of the discovery and notifying the CNF Archaeologist, who will consult with the United States Army Corps of Engineers (USACE), State Historic Preservation Office (SHPO) and Tribes, as necessary, to mitigate any adverse effects to significant cultural resources. If the evaluation determines the resource is not likely to yield significant information, including if there are no human remains and if the CNF archaeologist concurs with this conclusion, then no further work will be required. If the discovery is determined to be significant, mitigation measures would follow similar procedures for testing and data recovery at known archaeological sites. Construction activities in the immediate area would not resume until mitigation is completed.

- **FS-CR-11, Stabilization of Previously Excavated Sites:** Historic properties that were excavated during the ANAMAX project and were not backfilled have suffered erosion of those areas within the sites. Previously excavated sites that will not be impacted by the project will be backfilled. Underground marking tape of an undetectable variety will be placed in the depressions left by trenches, test units, and scraped areas, prior to filling them with a 20-cm layer of sterile material, topped by sediments from the backdirt piles located around the site edges. The site will be mapped using a GPS unit to record the areas backfilled, and ASM and CNF site records will be updated with these data. Backfilled sites will be added to the list of sites that will receive site condition monitoring. Material used for backfilling previous excavations will come from a location lacking any archaeological materials.

Mitigation Measures FS-CR-05 through FS-CR-10, including RC-CR-01, are fully addressed in this Plan. Monitoring will commence in the Pre-Mining Period of the Project and continue, as needed, through the Final Reclamation and Closure Phase (Closure Phase).

## 1.1 PLAN OBJECTIVE

The objective of this Plan is to enumerate the steps that Rosemont plans to take regarding the Cultural Resource elements listed in Mitigation Measures FS-CR-05 through FS-CR-10, and reporting on RC-CR-01. These Mitigation Measures are summarized below.

- FS-CR-05: Ground-disturbing activities will be limited between the security and perimeter fences. The Forest Service anticipates the following activities to occur between the fences: compliance well construction and access, stormwater drainage facilities, fence construction, road access to air quality monitoring site, and road decommissioning (see page B-72 in Appendix B of the FEIS [USFS, 2013a]). The Forest Service shall approve ground disturbing activities in advance and approved cultural monitors shall be present for all ground-disturbing work in this area (see ROD [USFS, 2017b]).
- FS-CR-06: Cultural resources protection training for personnel working on the Project (see page B-72 in Appendix B of the FEIS [USFS, 2013a]).
- FS-CR-07: Provide access for Tribal members for cultural practices, as subject to safety considerations including MSHA, within five (5) days of advanced request (see page B-73 in Appendix B of the FEIS [USFS, 2013a]). Requests for access shall be submitted to the Forest Service who will coordinate with the proponent to provide access (see ROD [USFS, 2017b]).
- FS-CR-08: Field visits for Tribal members to potentially affected springs before ground disturbance occurs in an area (see page B-73 in Appendix B of the FEIS [USFS, 2013a]).
- FS-CR-09: Incorporation of culturally important plants into the revegetation efforts by transplanting or seeding. This element also includes access prior to ground-disturbing activities by the tribes for plant collection (see pages B-73 and B-74 in Appendix B of the FEIS [USFS, 2013a]).

- FS-CR-10: Compiling and interpreting the results of the cultural investigation in a manner that is accessible and understandable to the public. The information will be displayed at the Rosemont Visitor Center within 6 months of the center being established and publications will be available within 18 months of finalization of the mitigation report (see page B-74 in Appendix B of the FEIS [USFS, 2013a]). The MOA (USFS, 2013b) requires such information to be available no later than the end of the third production year (see page D-9 in Appendix D of the FEIS [USFS, 2013a]).
- RC-CR-01: Compensation for loss of Tribal land through the acquisition of land and recordation of conservation easements. Lands associated with this mitigation measure would be part of lands acquired under other permitting processes, such as the through the Fish and Wildlife Service (FWS) Section 7 and the Corps of Engineers 404 processes (see page B-100 in Appendix B of the FEIS [USFS, 2013a]).

## **1.2 PLAN DESCRIPTION**

This remainder of this Plan includes the following sections:

- Section 2.0: Plan Details;
- Section 3.0: Monitoring and Reporting;
- Section 4.0: Data Management; and
- Section 5.0: References.

## 2.0 PLAN DETAILS

The following are discussed in this section:

- Section 2.1: Activity Restrictions (FS-CR-05);
- Section 2.2: Cultural Resources Protection Training (FS-CR-06);
- Section 2.3: Tribal Access with Five Day Notice (FS-CR-07);
- Section 2.4: Tribal Access Prior to Start (FS-CR-08);
- Section 2.5: Incorporating Plants into Reclamation (FS-CR-09);
- Section 2.6: Results Interpretation (FS-CR-10); and
- Section 2.7: Conservation Land Easements (RC-CR-01).

### 2.1 ACTIVITY RESTRICTIONS (FS-CR-05)

The installation of perimeter and security fencing is one of the earlier activities to occur in order to provide protection to the general public, to restrict site access to construction personnel only, and to provide site personnel with a clear indication of activity areas. These fences will be completed before mining operations start and may be installed coincident with archaeological work, geotechnical investigations, site preparation, and/or the construction of access from State Route (SR) 83. Rosemont will work with the Forest Service to ensure all public notifications are made prior to the installation of fencing that will restrict public access.

Work anticipated between the perimeter and security fences includes: compliance wells, stormwater drainage facilities, the perimeter fence maintenance, a road to access air quality monitoring, road decommissioning activities and stabilization of previously excavated sites (FS-CR-11) as well as any required monitoring. Because these activities are all evaluated in the FEIS and authorized by the MPO, no specific advance notification will be provided. Activities other than those listed will be identified in notice letters to the Forest, along with proposed mitigation (i.e., avoidance or monitoring). Notifications will be provided thirty days before the activity is scheduled. Forest Service comments will be incorporated into the plan for disturbance. If the Forest Service does not respond thirty days prior to the proposed start date then the proposed activity and mitigation measures will be assumed to be approved. Cultural sites would be avoided if at all possible. Cultural sites that cannot be avoided would be treated per the applicable HPTP requirement. Temporary and permanent fencing will be used, as needed, to ensure protection of cultural resources.

The details regarding the fencing and avoidance locations are included in the *Fencing Specifications* (MPO Volume II-k), and site-specific recommendations are included in the HPTP. The HPTP documents the results of previous consultation resulting in recommendations that several of the historic properties can be avoided by relocating fences or roads, and where appropriate, that protective fencing be installed to deter incursions onto the sites. Monitoring will ensure these mitigation measures are implemented appropriately during construction activities.

As described in the *Vegetation Clearing and Area Clearance Plan* (MPO Volume II-aa), archaeological data recovery work will need to be completed before ground disturbance occurs in an area.

### 2.2 CULTURAL RESOURCES PROTECTION TRAINING (FS-CR-06)

Per Mitigation Measure FS-CR-06, a training video (Appendix A) was developed to provide consistent and clear training on the requirements regarding protection of cultural resources. Rosemont worked with the Forest Service to develop approved content in November and December 2015. As required,

Rosemont also attempted to work with the Tribes to develop the video as required in the mitigation element; however, the tribes declined to participate in the effort.

The MOA requires development of training for both cultural sensitivity training and archeological monitor training. The video is intended as one tool in the overall training program and is primarily meant to provide the cultural sensitivity training received by all personnel. The video is not intended to be sufficient to provide full training for archeological monitors, and additional training materials will be developed as appropriate. As additional training programs are developed, Rosemont intends to engage the Tribes in development of those programs.

To the degree appropriate for their involvement in Project, training will be given to all employees, contractors, and other personnel who will be working on-site. All personnel will receive initial training along with other required site training in safety and environmental compliance. In addition, personnel will be retrained periodically (at least annually) and the video recording will be available upon request. A quiz will be given at the conclusion of the video to document that personnel have viewed the video (see Appendix B). Any personnel incorrectly answering less than 70 percent of the quiz questions will require a follow-up discussion with the trainer to ensure that cultural resource protection requirements are understood.

A hardhat sticker designating completion of the training will be provided to Rosemont personnel and contractors. This will make it easier to identify personnel who have been trained.

### **2.3 TRIBAL ACCESS WITHIN FIVE DAYS NOTICE (FS-CR-07)**

Upon request by a Tribe for access, Rosemont will review the area of the Project site where access is requested, ensure that access can be granted safely and respond to the Tribe within five (5) days. If the area where access is requested is available, access will be granted to the Tribes; however, if an area is actively being mined or access is otherwise prohibited by construction activities, access will not be granted and an explanation will be made to the Tribe.

If the area is inside of the security fence, each person accessing the site will receive safety training, safety equipment, and will be escorted to the site. Access to sites outside of the security fence but inside the perimeter fence will have similar requirements as those within the security fence. Training and an escort will be required; however, safety equipment may not be necessary.

### **2.4 TRIBAL ACCESS TO SACRED SITES AND PRIOR TO START (FS-CR-08)**

On June 9, 2017 after the Record of Decision (ROD, [USFS, 2017b]) was signed, Rosemont sent a letter to each of the Tribes identified in the MOA to invite them to the Rosemont Project site prior to ground disturbance at a time when Rosemont did not have field activities scheduled. This was to provide a time of solitude should the Tribes had chosen to access the site to visit springs or collect plants or minerals as specified in the MOA during this time period.

Rosemont will also accommodate site access requests at other times of the Project, as conditions permit (see Section 2.3). Access will also be subject to a minimum five (5) day notice to Rosemont as per Mitigation Measure FS-CR-07 (also see Section 2.3).

### **2.5 INCORPORATING PLANTS INTO RECLAMATION (FS-CR-09)**

Per Mitigation Measure FS-CR-09 and request of the Tribes, Rosemont has agreed to transplant culturally significant plants. As appropriate, Rosemont will incorporate culturally significant species in seed mixtures as described in the *Revegetation and Growth Media Monitoring Plan* (Rosemont, *Mine Plan of Operations* [MPO] Volume II-v). The plant species to be considered are included in the table below (Table 1). Not all plants listed are native to the Rosemont site; however, Rosemont is considering all plants suggested unless the plants are considered noxious weeds, invasive species or otherwise directed by the Forest Service. Closure and revegetation activities will adhere to the approved *Reclamation and Closure Plan* (MPO Volume III-a) and plants not native to the Rosemont site may not be included in the reclamation mixture per Forest Service requirements.

In addition to incorporating species in the seed mixtures, some species are expected to volunteer from seeds within the seed bank as indicated in Table 8 of the *Revegetation and Growth Media Monitoring Plan* (MPO Volume II-v). The Tribes will be notified of transplant locations. Currently planned location includes an area near Questa Spring, Davidson Canyon mitigation parcel number 305-62-011A, and the reclaimed surface of the Landform. The Landform consists of a consolidated and reclaimed Waste Rock Storage Area (WRSA) and Dry Stack Tailings Facility (DSTF). An archaeologist will monitor surface disturbance associated with transplanting and no plants will be placed in an area that has identified cultural resources. Also, as described above in Sections 2.3 and 2.4, Tribes can request access to salvage culturally significant plants.

**Table 1. Plants of Traditional Importance within the Rosemont Project Area**

Plant	Apache <sup>1</sup>	Tohono O'odham <sup>2</sup>	Native to Rosemont Site
<b>Trees/Shrubs</b>			
Velvet mesquite ( <i>Prosopis velutina</i> )	X	X	X
One seed juniper ( <i>Juniperus monosperma</i> )	X		X
Alligator juniper ( <i>Juniperus deppeana</i> )	X		X
Mexican pinyon ( <i>Pinus cembroides</i> )	X		X
Emory oak ( <i>Quercus emoryi</i> )	X		X
Palo verde ( <i>Parkinsonia L.</i> ) <sup>3</sup>		X	
Coral bean ( <i>Erythrina flabelliformis</i> ) <sup>3</sup>	X		
Desert sumac ( <i>Rhus microphylla</i> ) <sup>3</sup>	X		
Ocotillo ( <i>Fouquieria splendens</i> )	X		X
White sagebrush ( <i>Artemisia ludoviciana</i> )	X		X
Fairy duster ( <i>Calliandra eriophylla</i> )			X
Creosote bush ( <i>Larrea tridentata</i> ) <sup>3</sup>		X	
Mormon Tea ( <i>Ephedra trifurca</i> ) <sup>3</sup>		X	
Saltbush ( <i>Atriplex</i> species not specified)		X	X
Hackberry ( <i>Celtis pallida</i> , <i>C. reticulata</i> )		X	X
Acacia (species not specified)		X	X
<b>Succulents and Cacti</b>			
Palmer agave ( <i>Agave palmeri</i> )	X		X
Parry agave ( <i>Agave parryi</i> )	X		X
Banana yucca ( <i>Yucca baccata</i> )	X		
Soap tree yucca ( <i>Yucca elata</i> )	X		X
Bear grass ( <i>Nolina microcarpa</i> )	X	X	X
Sotol ( <i>Dasyliirion wheeleri</i> )	X		X
Prickly pear ( <i>Opuntia phaeacantha</i> )	X	X	X
Barrel cactus ( <i>Ferocactus wislizeni</i> )		X	X
Cholla (species not specified)		X	X
Hedgehog ( <i>Echinocereus sp.</i> )		X	X
<b>Forbs</b>			
Desert marigold ( <i>Baileya multiradiata</i> )		X	X
Yarrow ( <i>Achillea L</i> species not specified)		X	X
Penstemon (species not specified)		X	X
Globemallow ( <i>Sphaeralcea sp.</i> )		X	X
Desert zinnia ( <i>Zinnia acerosa</i> )		X	X
Mexican gold poppy ( <i>Eschscholzia californica ssp. Mexicana</i> )		X	X
Prickly poppy ( <i>Argemone</i> species not specified)			X
Lupine ( <i>Lupinus</i> species not specified)		X	X
<b>Grasses</b>			
Black grama ( <i>Bouteloua eriopoda</i> )	X		X
Blue grama ( <i>Bouteloua gracilis</i> )	X		X
Hairy grama ( <i>Bouteloua hirsuta</i> )	X		X
Sideoats grama ( <i>Bouteloua curtipendula</i> )	X		X
Alkali ( <i>Puccinellia</i> )		X	
Sacaton ( <i>Sporobolus</i> not specified if alkali or big sacaton)		X	X
Switchgrass ( <i>Panicum virgatum L.</i> )		X	X <sup>4</sup>
Arizona cottontop ( <i>Digitaria californica</i> )			X
Curly mesquite ( <i>Hilaria belangeri</i> )			X
Green sprangletop ( <i>Leptochloa dubia</i> )			X
Plains lovegrass ( <i>Eragrostis intermedia</i> )			X
Bottlebrush squirreltail ( <i>Elymus elymoides</i> )			X

<sup>1</sup>Information supplied by the Mescalero Apache Tribal Historic Preservation Office

<sup>2</sup>Information from Sonoran plant list compiled by Tohono O'odham for ASARCO mine reclamation; supplemented by comments by O'odham representatives during onsite tours

<sup>3</sup>These species are listed in the Rosemont Flora (Davis and Callahan, 1977), but have not been observed at the Rosemont Project area.

<sup>4</sup>According to USDA NRCS Plants Database, this species can be weedy or invasive.

## **2.6 RESULTS INTERPRETATION (FS-CR-10)**

Once the data recovery report is finalized, exhibits, public volumes, brochures, school curriculum, and/or online exhibits will be developed and made available to the public. This work will be specifically developed to ensure the information from the Rosemont Project is available for Tribal youth, local school districts and to the public. The information will help to dispel stereotypes by providing accurate and culturally aware information about the history of the Project area.

It is anticipated that details from the final report, as accepted by the Forest Service, will be used to create these displays and exhibits and all work will be prepared for review (by the Forest Service). Rosemont anticipates the following process:

- Final data recovery report is developed;
- Conceptual layout of exhibits, volumes, brochures, curriculum, exhibits, etc. (documents) will be developed by Rosemont within six months of receipt of the final report;
- Rosemont and the Forest Service will meet to review the conceptual documents and invite the Tribes to attend. It is anticipated that this may take more than one meeting but should be completed within 3 months;
- Rosemont will finalize the documents and present to the Forest Service and consulting Tribes for approval during the next six months; and
- Rosemont will produce the documents in appropriate formats and have them ready for distribution at the end of the next three months.

After all materials are finalized the work will include making exhibits available and giving presentations, if requested, to various groups. Additionally, a permanent exhibit will be installed within six (6) months of establishing a Visitor's Center. Information will also be available at the Arizona State Museum, Tribal cultural centers and online on the Forest Service Website. Public volumes, brochures and an online exhibit interpreting the results of the cultural investigations will be made available for the public following the schedule above and within 18 months of the data recovery report finalization and acceptance by the Forest Service.

## **2.7 CONSERVATION LAND EASEMENTS (RC-CR-01)**

Work associated with this Mitigation Measure involves the reporting of mitigation land acquisitions/holdings and their associated access easements/restrictions, especially with respect to Tribal access. The protection of cultural resources is part of the resource protection that will be encompassed in the conservation easements; Rosemont is working with the Forest Service and the Corps of Engineers to develop language that is acceptable.

## 3.0 MONITORING AND REPORTING

Most of the monitoring and reporting components for the cultural resources are included in the HPTP and are not reproduced in this Plan, i.e. Mitigation Measures FS-CR-01 through FS-CR-04 and FS-CR-11. The anticipated monitoring and reporting components for Mitigation Measures FS-CR-05 through FS-CR-10, and RC-CR-01, are listed below.

### 3.1 MONITORING

Monitoring related to Mitigation Measures FS-CR-05 through FS-CR-10, and RC-CR-01, will include the following:

- FS-CR-05: Monitoring activities between the perimeter and security fences. Prior to ground-disturbing activities, areas will be cleared as described in the *Vegetation Clearing and Area Clearance Plan* (MPO Volume II-aa). Track Forest Service approvals and activities of cultural monitors and findings.
- FS-CR-06: Maintain personnel records with regard to cultural awareness training.
- FS-CR-07: Track site access requests and details of site visits by Tribal members.
- FS-CR-08: Track site access requests and details of site visits by Tribal members.
- FS-CR-09: Monitoring of culturally important plants incorporated into the reclamation work is part of the *Revegetation and Growth Media Monitoring Plan* (MPO Volume II-aa). Track transplanted plants and access requests and details of site visits by Tribal members.
- FS-CR-10: Track development of exhibits\brochures\exhibits, etc.
- RC-CR-01: Monitoring associated with this mitigation measure includes tracking of land acquisitions and status.

### 3.2 REPORTING

Reporting on Mitigation Measures FS-CR-05 through FS-CR-10, and RC-CR-01, will be performed annually to the Forest Service and will include the following:

- FS-CR-05: Provide a list of ground-disturbing activities that have occurred between the security and perimeter fencing and confirmation that monitors were present during activities.
- FS-CR-06: Provide number of personnel trained (and retrained) with regard to cultural awareness.
- FS-CR-07: Summarize site access requests and details of visits by Tribal members, notify Forest Service when visits are completed.
- FS-CR-08: Summarize site access requests and details of visits by Tribal members, notify Forest Service when visits are completed.
- FS-CR-09: Reporting on culturally important plants incorporated into the reclamation work is part of the *Revegetation and Growth Media Monitoring Plan* (MPO Volume II-v). Reporting on transplanted plants at mitigation parcels as well as the number of plants and site location. A summary of site access requests and details of visits by Tribal members.
- FS-CR-10: Report on development of brochures\exhibits, etc.

- RC-CR-01: Summarize mitigation land holdings, including the reporting on new acquisitions and the status of easements/access restrictions regarding the mitigation lands.

## **4.0 CLOSURE AND BOND RELEASE**

This section addresses closure activities associated with this Plan as well as the approach for funding of those activities and bond release of those funds. If bonding is set for one year or less (i.e., simply completing testwork or finalizing reporting) no bond release is proposed. For longer periods, the bonding terms and application for bond release, as well as the mechanism for that release, are included.

As stated previously, the HPTP requirements are not recreated in this Plan. Any activities associated with unanticipated discovery, whether during suspension, closure or other times, will be managed according to the HPTP (SWCA, 2014). The project termination plan included in Chapter 10 of the HPTP (SWCA, 2014) would be followed in the event “the Rosemont Copper undertaking is terminated for any reason before the mitigation of adverse effects is completed; the process is not complete until the data analysis, reporting, curation of collections, and public programming has been completed”.

### **4.1 INTERIM CLOSURE**

There are no interim closure activities associated with Mitigation Measures FS-CR-05 through FS-CR-10, and RC-CR-01.

### **4.2 CLOSURE**

Requirements for closure are specific to monitoring and reporting during activities related to ground disturbance. The areas that will be closed will all have been impacted prior to closure; therefore, closure activities should only involve monitoring. Estimated monitoring costs are provided in the *Reclamation and Closure Plan* (MPO Volume III-a). Once closure is complete, no additional work is planned.

Required displays and other public materials will be completed during the curation and development of the final data recovery report. They will become the property of the Forest Service for use in appropriate venues.

### **4.3 BOND RELEASE**

Once activities are complete, if there are remaining bond funds, it is anticipated they will be released at this time. No interim bond release is anticipated.

## 5.0 DATA MANAGEMENT

Chapter 11 of the HPTP (SWCA, 2014) details data management requirements for cultural resources. Deliverables for the project include reports documenting the results of archival, ethnohistorical, and archaeological data recovery, brochures, and exhibits created to convey those results to the public, and curation of all collection materials in perpetuity as required by 36 CFR 79.

As in the case of testing and data recovery activities, results will be reported in stages, including end-of-fieldwork reports, draft reports, and final reports, providing appropriate periods for comment by consulting parties and time for revision. Phase I and Phase II data recovery reports are to be submitted within 30 days of the end of fieldwork for each stage of the project. Draft and final synthetic reports are submitted no later than 12 and 18 months after the end of fieldwork.

Daily monitoring reports will be filed with Rosemont and monitoring results will be provided in final reports. Monitoring results will be incorporated in the final report or as a separate analysis for activities occurring after completion of the final report. Data regarding collections and human remains will follow the requirements of FS-CR-02 and FS-CR-03.

Electronic submittals will be made on the reporting period specified. Reports will be submitted in hardcopy form with a duplicate electronic pdf file. Delivery of the electronic files will depend upon the size of the file and will either be made via email, via a CD/DVD or thumb drive, or via a website set up and maintained for delivery of files to the Forest Service. Details regarding access will need to be worked out so transmittals can take place seamlessly.

As appropriate files will also be posted to the website maintained by Rosemont for reporting requirements. The Forest Service must first approve materials prior to posting; therefore, Rosemont will post materials within 90 days of Forest Service approval rather than within 90 days of delivery to the Forest Service.

## 6.0 REFERENCES

- EPG, 2014: *A Historic Properties Treatment Plan for Rosemont Copper Utilities, Pima County, Arizona*. November 2015.
- Davis, R. and J.R. Callahan, 1977. *An Environmental Inventory of the Rosemont area in Southern Arizona, volume I: The present environment*. University of Arizona Press, Tucson, AZ.
- SWCA, 2014. *Historic Properties Treatment Plan for the Proposed Rosemont Copper Project, Pima County, Arizona*. December 2014.
- USFS, 2013a. *Final Environmental Impact Statement for Rosemont Copper Project, Appendix B Mitigation and Monitoring Plan*. December 2013.
- 2013b. *Memorandum of Agreement, Among the Coronado National Forest, Arizona State Historic Preservation Officer, Advisory council on Historic Preservation, U.S. Army Corps of Engineers, and the Rosemont Copper Company, Regarding Resolution of Adverse Effects on Historic Properties from The Rosemont Copper Project*. October 2013.
- 2017a. *Errata – Rosemont Copper Project Final Environmental Impact Statement*. April 26, 2017.
- 2017b. *Record of Decision – Rosemont Copper Project and Amendment of the Coronado Land and Resource Management Plan*. June 2017.

## **APPENDIX A**

Cultural Training Video (provided separately)

## **APPENDIX B**

Training Quiz and Sign In Sheet

## Cultural Resource Training Quiz

- What are Archaeological Resources?

(Answer: They are sites or materials that are evidence of past activities.)

- Which of the following are considered archaeological resources? (Check all that apply):
  - Pots or arrowheads
  - Landscapes
  - Shrines
  - Mine Shafts

(Answer: All should be checked)

- Cultural monitors will be available during construction – Yes or No

(Answer: Yes)

- Which of the following describe why archaeological resources are important? (Check all that apply)
  - They tell of story of people
  - They are valuable
  - They show where trading took place
  - They show how people lived

(Answer: All four should be checked)

- Archaeological resources should be moved to protect them – True or False

(Answer: False)

- Is it legal to collect or disturb archaeological resources? Yes or No

(Answer: No)

- If you break the laws discussed in the training video, what is the fine you may be subject to?

(Answer: \$100,000 plus a felony conviction and seizure of property)

- What three things should you do if you find archaeological resources?

(Answer: Stop, Notify the cultural monitor, Start work only when released)

