



# **CULTURAL RESOURCES VOL 1**

## **BASELINE METHODS AND DATA**

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### **TWIN METALS MINNESOTA PROJECT**

Environmental Review Support Document

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Prepared for Twin Metals Minnesota, LLC  
Prepared by

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## **REVISION RECORD**

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## **REVISION NARRATIVE**

## **DISCLAIMER**

*This document is a working document. This document may change over time because of new information, or further analysis or deliberation.*



## TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	SUMMARY.....	1
3.0	PROPOSED ACTION AND ALTERNATIVES.....	1
3.1	PROPOSED ACTION.....	1
3.2	ALTERNATIVES TO THE PROPOSED ACTION.....	1
3.3	NO ACTION ALTERNATIVE.....	2
4.0	REGULATORY FRAMEWORK.....	2
5.0	AFFECTED ENVIRONMENT.....	2
5.1	AREA OF ANALYSIS.....	2
5.2	METHODS.....	3
5.3	EXISTING CONDITIONS.....	3
6.0	REFERENCES.....	3

## TABLES

## FIGURES

## APPENDICES

## LIST OF ABBREVIATIONS, ACRONYMS, AND SYMBOLS

TMM

Twin Metals Minnesota, LLC

## **1.0 INTRODUCTION**

The Twin Metals Minnesota, LLC (TMM) Project (Project) is focused on designing, permitting, constructing, and operating an underground copper, nickel, cobalt, platinum, palladium, gold, and silver mining project. Located approximately nine miles (14 kilometers [km]) southeast of Ely, Minnesota, and 11 miles (18 km) northeast of Babbitt, Minnesota, the Project targets valuable state, federal, and private minerals within the Maturi deposit, which is a part of the Duluth Complex geologic formation.

All potential Project infrastructure locations presented herein are considered preliminary and are undergoing further design and engineering evaluations which will dictate final design and locations. Further information about TMM and the Project is located at <http://www.twin-metals.com/>.

The purpose of this document is to provide necessary information for the environmental review and permitting process. TMM retained [insert Consultant name] (insert abbreviated Consultant name) to complete [insert text].

## **2.0 SUMMARY**

- Provide a high level summary of what is presented within this report.
- Describe how this report volume relates to the other volumes.
- Describes how the area of analysis was selected.
- Describes rationale and approach for collection of baseline data.
- Describes cultural and historic resources within the area of analysis.
- Describe status of identified sites or district.
- Reference relevant sections of the FSDD, SEAW, and / or federal documents to remind the reader there is a defined scope that is being followed.

## **3.0 PROPOSED ACTION AND ALTERNATIVES**

### **3.1 Proposed Action**

- Reference the TMM Project Description and Alternatives document and indicate the proposed action is defined within this document.

### **3.2 Alternatives to the Proposed Action**

- Reference the TMM Project Description and Alternatives document and indicate the alternatives to the proposed action are defined within this document.

### **3.3 No Action Alternative**

- Reference the TMM Project Description and Alternatives document and indicate the no action alternative is defined within this document.

### **4.0 REGULATORY FRAMEWORK**

- Establish Regulatory Framework by discussing the following:
  - The American Indian Religious Freedom Act;
  - Archaeological Resources Protection Act Overview
  - American Indian Religious Freedom Act Overview
  - Native American Graves Protection and Repatriation Act;
  - Executive Order (EO) 13007, Indian Sacred Sites;
  - Executive Order 13175, Consultation and Coordination with Indian Tribal Governments;
  - Secretarial Order 3206 - American Indian Tribal Rights, Federal Tribal Trust Responsibilities, and the Endangered Species Act;
  - Procedures and guidance for Native American Consultation as outlined in BLM Manual H-8120-1 (BLM, 2004); and
    - The goal is to “assure that tribal governments, Native American communities, and individuals whose interests might be affected have a sufficient opportunity for productive participation in BLM planning and resource management decision making”
  - Programmatic agreement(s) or MOA(s) for the project.

### **5.0 AFFECTED ENVIRONMENT**

The affected environment will be reviewed based on the area of analysis, deconstructed by Project feature and / or activities that would cause the potential effects to cultural resources. (e.g., mine site, plant site, roads, construction, operation, closure, and reclamation).

#### **5.1 Area of Analysis**

Area of analysis will be developed and described. Area of analysis will be developed accounting for the following:

- Defined project boundaries for the proposed action and alternatives to the proposed.
  - Construction areas (ground disturbing activities)
  - Sensitivity to disturbance
  - Project activities that would lead to disturbance (e.g., construction and operation)

- Area of potential effect (APE) described within the other volumes of the *Cultural Resources Data Package*.

## **5.2 Methods**

Methods for defining the affected environment will be defined in this section including the following:

- Methods for obtaining background information from various repositories, including SHPO, Minnesota OSA, and USFS files at the SNF;
- Methods for Identifying Historic Properties;
- Method for identifying the extent of the Mesabi Widjiu – utilizing Mesabi Widjiu Context Study;
- Describe desktop based assessment methods for broadly assessing archaeological potential in the vicinity of the Project;
- Describe methods for Phase I and Phase II archaeological and architectural history surveys.
- Identification of Consulting Parties; and
- Methods to identify properties of religious and cultural significance.

## **5.3 Existing Conditions**

Using the methods defined in Section 5.1, existing conditions will be described within this section including the following:

- Archaeological sites and history;
- Historic properties and history;
- Cultural resources; and
- Native American religious and traditional values

## **6.0 REFERENCES**



## **TABLES**



## **FIGURES**





## **APPENDICES**



**APPENDIX [#A, B, C, D]**

**[APPENDIX TITLE]**



## **APPENDIX [#A, B, C, D]**

### **[APPENDIX TITLE]**

*[Insert page break for each additional appendix.]*