

Summary of Annual Reporting Requirements Identified in the Adaptive Management Plan

AMP Appendix/ Pg	AMP Annual Reporting Requirements	Primary Objective	Included in 2008 Reports?	Location in 2008 Reports/ Comments	Suggestions	Kinross Comments
A: AMP for Mine Dewatering Impacts to Seeps and Springs (pg 3-4)	Prepare a hydrograph showing monthly flow (discharge) from the feature over time compared to the pre-mining baseline condition reported in the FSEIS	Determine changes in the hydrological regime of the wetlands, seeps, and springs as a result of mine dewatering and mine filling and compare those impacts to that predicted in the Supplemental Environmental Impact Statement (SEIS) based on the results of the numerical groundwater flow model. (pg. 2)	Partial Completion	Seeps and Springs, Figs 3-7 - 3-23; many locations are missing monthly data; not all locations have complete pre-mining records	How can we get baseline data?	Figs 3-7 to Fig 3-24, Seeps and Springs Memo
	Prepare a graph of wetted area on a month-by-month basis compared to pre-mining baseline conditions reported in the FSEIS		Partial Completion	Aquatic Habitat, Table 3-1; 2008 wetted areas but no comparison to pre-mining baseline conditions	Compare to pre-mining wetted areas in FSEIS	
	Prepare a hydrograph of daily precipitation		No	No hydrograph from Buckhorn Mountain Location	Data from on-site met station	
	Prepare a hydrograph showing snowpack		No	One location (Moses Mountain) - nothing from Buckhorn Mountain Location	Data from on-site met station	
	Reassess wetland function (Ecology Category rating) every three years and compare to wetland function ratings reported in FSEIS		No - not required	Too soon to compare wetland function		
	Prepare two water table maps (low groundwater and high groundwater) and compare with pre-mining conditions		Partial Completion	Water Quality, Figures 2-2 and 2-3; no comparison with pre-mine conditions	Comparison of groundwater levels to pre-mining conditions	Figs 2-2 and 2-3 Water Quality Memo
	Compare photographs of the feature from established photo points from pre-mining and during mining in July of each year		No	No photographs included in report. It mentions taking photographs once June/July 2008 (pg 7), no mention of pre-mining photographs taken.	Include photos or reference to report containing photos, and summary of results, in annual report	Golder Report - Buckhorn Mine Ecological Monitoring Results 2008
	Evaluate groundwater levels from the piezometers installed to determine the effects of mine dewatering on the local and regional groundwater system on Buckhorn Mountain		No	No evaluation of effect of mine dewatering at local or regional scale - no data from piezometers outside of infiltration gallery. Not all piezometer locations have pre-mining data. .	Hydrographs for all remaining piezometers and wells and evaluation of local and regional impact	
	Statistical analysis to determine: 1. Whether there are changes in monthly discharges and wetted area in seeps and springs that might be due to mining operations 2. Whether the groundwater model is adequately predicting the change in streamflows		No	Seeps and Springs, pg. 9: "A complete statistical analysis following the methodology outlined in the Adaptive Management Plan was not possible because only one year of post-mining data are available and the post-mining data indicate higher than average seep and spring discharge." Available data do not support the conclusion that post-mining flows are higher than "average" pre-mining flows. Many locations have incomplete pre-mining flow data, especially during high-flow Spring months.	Re-evaluate seep and spring flows and comparison to pre-mining conditions	Insufficient Operational Data

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B: AMP for Mine Dewatering and Water Supply Impacts to Streamflow (pg. 7, 10, 11, 13, 14, 17, 18)	Infiltration Gallery:	Determine whether the infiltration gallery is functioning properly as a mitigation action and is capable of receiving up to 20 gpm of treated effluent. The purpose of this monitoring is to determine changes in groundwater levels thus providing data to assist in the evaluation of down-gradient changes in water quality required by the NPDES permit.					
	Prepare a hydrograph showing discharge to the infiltration facility (Outfall 001)		No		Hydrograph for Outfall 001	Not included. Only started operating in early October 2008	
	Prepare a hydrograph for the wells and piezometers showing the change in (? <i>Sentence ends - assume it should be: water levels compared to pre-mining conditions</i>) (P-1, P-2, P-3, P-1a, P-2a, P-3a, P-4a)		Partial Completion	Streamflow Impacts, Fig. 3-7 shows piezometer data (depth to groundwater), but no data from Nov 2005 - Nov 2007. This is the same figure presented for the Seeps and Springs report. WTP and Stormwater, Figure 3-38 shows piezos in infiltration area, but results are different. No monitoring well data are presented.	Need hydrographs for wells in infiltration gallery area (MW-3, MW-4, MW-13) and comparison to pre-mining conditions. Why two yrs of missing data for piezometers?		
	Prepare a hydrograph of the spring flow rate over time compared to pre-mining conditions (JJ-18, JJ-20)		Partial Completion	Seeps and Springs, Figures 3-10 and 3-11. Many missing monthly samples for JJ-20 (Figure 3-11)	Address missing flow data for JJ-20. According to DMRs, flow was frozen in April and 0 in Jan, Feb, March, May		
	Prepare a hydrograph of streamflow at SW-7 compared to pre-mining conditions		Yes	Streamflow Impacts, Table 3-9 and Figure 3-15			
	Prepare two water table maps (low groundwater and high groundwater) for the infiltration area and comparison with pre-mining conditions		Partial Completion	Water Quality, Figures 2-2 and 2-3; no comparison with pre-mine conditions	Comparison of groundwater levels to pre-mining conditions	Not included. Only started operating in early October 2008	
	Evaluate groundwater levels from the piezometers installed to determine the effects of mine infiltration on the local and regional groundwater system on Buckhorn Mountain		Partial Completion	Streamflow Impacts, pg. 14: "data collected in Mine Year One show no evidence that mining operations have led to decreased streamflows or water levels. In most cases the 2008 water levels and streamflows were slightly higher than historic averages despite slightly lower than average precipitation in 2008." However, many locations have incomplete pre-mining data.	Evaluation of groundwater levels in infiltration area piezometers	Not included. Only started operating in early October 2008	
	Complete an evaluation to determine the maximum discharge rate at the infiltration gallery without developing adverse conditions. The evaluation will be based on the hydrological and hydrogeological information collected. No statistical tests will be performed to make this evaluation.		No	Discharge information for Outfall 001 not presented or evaluated	Conduct evaluation of maximum discharge rate at infiltration gallery using existing information	Not included. Only started operating in early October 2008	
	Roosevelt Adit:		The objective of the monitoring program is to determine whether flow augmentation at Roosevelt Adit is effective in enhancing streamflow and flow into wetlands.				
	Preparation of a precipitation hydrograph based on on-site measurements			No	No precipitation hydrograph presented using on-site data		
Preparation of a hydrograph of the discharge of treated water to Roosevelt Adit	No	Streamflow Impacts, Section 4.2 - no adaptive management actions were needed					
Preparation of a hydrograph showing monthly flow (discharge) at Roosevelt Adit up-stream of the treated effluent discharge.	Yes	Streamflow Impacts - Figure 3-8					
WDFW, Ecology, USFS meet with Crown/Kinross within one month of Annual Report and develop Contingency Plan if continued monitoring suggests that the impacts to Roosevelt Adit will be 80% of that predicted in the SEIS	No - not required	Streamflow Impacts, pg. 9: No impacts identified to Roosevelt Adit, 2008 flow was higher than 2007 flow.					

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B: AMP for Mine Dewatering and Water Supply Impacts to Streamflow (pg. 7, 10, 11, 13, 14, 17, 18) (cont.)	Marias Creek:	The objective of the monitoring program is to determine whether flow augmentation at Marias Creek is effective in enhancing streamflow and flow into wetlands.					
	Preparation of a precipitation hydrograph based on on-site measurements		No	No precipitation hydrograph using on-site data	Data from on-site met station		
	Preparation of a hydrograph of the discharge of treated water to Marias Creek (Outfall 004)		No	No hydrograph for outfall to Marias Creek (004)	Hydrograph of Outfall 004		
	Preparation of a hydrograph showing monthly flow (discharge) at SW-8		Substantial completion	Streamflow Impacts, Figure 3-9. Some missing months on graph that are included in composite database	Present all flow data on graph		
	WDFW, Ecology, USFS meet with Crown/Kinross within one month of Annual Report and develop Contingency Plan if continued monitoring suggests that the impacts to Marias Creek will be 80% of that predicted in the SEIS		No - not required	Streamflow Impacts, pg. 11: Report concludes that no impacts were identified in Marias Creek. However, flow was significantly different in the fall vs. previous year averages, the report attributes this to a low-precipitation year.	Include precipitation on graph with streamflow so influence of timing and amount of precipitation can be considered in evaluation of streamflow changes		
	Myers Creek flow augmentation:		1. Determine the impacts of mine dewatering on streamflow in the tributaries draining Buckhorn Mt 2. Determine when streamflow augmentation from the Lost Creek Ranch well will be required in a particular year 3. Determine the effects of augmentation on the flow in Myers Creek.				
	Preparation of a precipitation hydrograph based on on-site measurements			No	No precipitation hydrograph using on-site data	Data from on-site met station	
	Preparation of a hydrograph showing monthly flow (discharge) at the surface water stations (SW-5, SW-11, SW-14, SW-10)			Yes	Streamflow Impacts: Streamflow hydrographs presented for tributaries: Ethel Creek, Bolster Creek, and Gold Creek. Figures 3-11 to 3-15	Include precipitation data on graph	
	Preparation of hydrographs showing groundwater levels at the piezometers (MCP-1, 2, 3, 4)			No	No hydrographs presented for Myers Creek piezometers (MCP-1, 2, 3, 4)	Create graphs showing water levels in Myers Creek piezometers	
	Preparation of a hydrograph showing water use from the well for irrigation and streamflow augmentation purposes			No	No hydrographs showing well water use	Hydrographs of water use	
	Photographs of irrigated area			No	No photographs presented	Photos of irrigated areas	
	WDFW, Ecology, USFS meet with Crown/Kinross within one month of Annual Report and develop Contingency Plan if continued monitoring suggests that the impacts will be 80% of that predicted in the SEIS			No - not required	Streamflow Impacts Report (Tables 1-2; Tables 3-5 3-8) indicates stream baseflows in Myers Cr tributaries were higher than average, even with lower than average precipitation.	Include precipitation on graph with streamflow so influence of timing and amount of precipitation can be considered in evaluation of streamflow changes	

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C: AMP for Water Quality Changes Due to Mining Operations (pg. 3-4)	Two water table maps (low and high groundwater), comparison with pre-mining conditions to determine capture zone.	The objective of the monitoring program is to determine: Whether the mine and dewatering wells are creating a capture zone to contain seepage from the mine, development rock and ore stockpiles; whether the water treatment plant is adequately treating the water generated during mining activities to meet NPDES permit limits (addressed in separate Adaptive Management Plan); whether the mining activities are impacting groundwater and surface water quality; and whether the stormwater BMPs used at the mine site are protective of aquatic resources. The results of the monitoring would be used to adapt, if needed, mining and mine water management activities as appropriate to meet the NPDES permit requirements.	Partial Completion	Water Quality, Figures 2-2 and 2-3 show groundwater contours and the capture zone in May and October (Is May best month to show highest groundwater levels?); no comparison to pre-mining levels; water levels should not be in water quality report - need separate AMP element	Water level graphs for wells and piezometers with pre-mining data needed	Figs 2-2 and 2-3 Water Quality Memo
	Water quality graphs for surface- and groundwater locations over time compared to pre-mining conditions		Partial Completion	Water Quality, Figure 3-1 - 3-31 (groundwater) and 3-32 - 3-63 (surface water). No water quality plots for MW-11, MW-12 (not required under NPDES), domestic well, and 5 dewatering wells or piezometers P-5 through P-15. Not all figures have location-specific pre-mining data (some are new monitoring stations, placed after the start of mining); graphs should have vertical lines for start of construction, start of mine operations (not only start of dewatering).	Include graphs for missing monitoring wells and piezometers. Add vertical lines for start of construction and development rock excavation. Use location-specific pre-mining data, as available. Add MW-11 and -12 to water quality sampling list	
	FEFLOW groundwater flow model covering the Buckhorn Mountain area and mine, run with information (groundwater levels, mine inflow rates, etc.) collected from the mine operations to simulate the configuration of the mine capture zone. Model results compared with piezometer and well water level measurement data.			No	NA	Evaluate appropriateness of using FEFLOW model and model inputs and assumptions

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D:AMP for Fine Sediment Deposition and Water Quality Changes in Marias Creek from the Mine Access Road (pg. 4-5)	<i>Information for each monitoring point will be collected:</i>	The objective of the surface water quality monitoring is to document any impacts on surface water quality resulting from mining operations and to demonstrate compliance with the applicable permits. This includes measurement of total suspended sediment and turbidity and magnesium chloride in Marias Creek as well as measurements of sediment deposition. This information will be used evaluate the effectiveness of BMPs for controlling sediment contributions to Marias Creek from the haul road and mining operations. Monitoring the success of BMPs will also help assure compliance with legal requirements. Information presented below is drawn from the Ecological and Hydrological Monitoring Plans.				
	Prepare a hydrograph for SW-2 the lower most station on Marias Creek showing monthly flow (discharge) over time compared to the pre-mining condition		Partial Completion	Streamflow Impacts, Figure 3-10. No high-flow data; need estimate. Figure was not included in Marias Sediment report or referenced in report	Prepare pre-mining high flow hydrograph for SW-2	
	Prepare a hydrograph of daily precipitation		Partial Completion	Marias Sediment report, Figures 3-1 - 3-5. No precipitation data from Buckhorn Mountain Location	Include available data from Buckhorn Mountain	
	Prepare a hydrograph showing snowpack		Partial Completion	Marias Sediment report, Figure 3-6 for Moses Mountain) - nothing from Buckhorn Mountain, 40 miles from mine	Use available data from Buckhorn Mountain	
	Prepare a summary of any known land use changes in the watershed		No		Baseline land use could be summarized	Access Road did not open till mid-October 2008. Insufficient Data
	Prepare graphs showing weekly and monthly magnesium, sodium, chloride, TSS and high-frequency turbidity measurements (from the data loggers) in Marias Creek		Partial Completion	Marias Creek Sediment memo Figures 3-7 through 3-10 for MC-1 and MC-3. No data presented for MC-2, yet data are available. Weekly data not presented.	Include vertical lines for beginning of hauling; make graphs for MC-2, include weekly data	Figs 3-7 to 3-10, Sediment Memo
	Prepare a figure showing annual sediment deposition data		No	No figure showing sediment deposition in Marias Creek Sediment memo.	Include data and graph for sediment deposition	
	Photographs of each of the BMPs		No	No photographs included in Marias Creek Sediment memo. No mention of taking photographs.		Not Available
	<i>Answer the following questions for each monitoring point:</i>					
	Are the BMPs functioning effectively?		No	Marias Creek Sediment memo, pg. 3: "in future years the water quality data will be compared to the baseline (Year 0) data summarized in this memorandum to determine whether BMPs are effective at protecting Marias Creek from adverse impacts related to the use of the haul road."		Access Road did not open till mid-October 2008. Insufficient Data
	Are the BMPs installed to control sediment effective in limiting sediment and chemical contributions to Marias Creek?		No	see above		Access Road did not open till mid-October 2008. Insufficient Data
	Are BMPs effective in minimizing magnesium, sodium, and chloride concentrations in Marias Creek?		No	see above		Access Road did not open till mid-October 2008. Insufficient Data
	Are any increases in sediment discharge explained by natural seasonal or non-seasonal variation?		No	see above		Access Road did not open till mid-October 2008. Insufficient Data
	Does surface water quality from Marias Creek exceed water quality criteria for turbidity and chloride?		No	see above		Access Road did not open till mid-October 2008. Insufficient Data
	Are increases in turbidity in Marias Creek associated with the access road or natural factors?		No	see above		Access Road did not open till mid-October 2008. Insufficient Data
Perform statistical analysis of the data to determine whether the BMPs are effective in controlling sediment	No	see above		Access Road did not open till mid-October 2008. Insufficient Data		

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E: AMP for Aquatic Habitat Improvement to Mitigate for Streamflow Impacts from Mine Dewatering (pg. 5-12)	<i>Nicholson and Marias Creek Culverts:</i>	Nicholson and Marias Cr Culverts: Determine whether fish passage design criteria are being met upon completion of the mitigation action. Myers Cr Preservation/ Enhancement: Determine whether preservation/enhancement of the property (97-ac Crown Resources property and 29-ac Pine Chee wetland) is effective in enhancing habitat. Marias Cr Enhancement: Determine whether preservation/enhancement of the Marias Cr property (lower 1/4 mile of creek) is effective in enhancing habitat.				
	Assigning each culvert replacement a percent score based upon one point for every design feature in compliance out of the total design features measured		No	Aquatic Habitat memo, Table 3-2. Evaluation of design criteria and fish population study not completed - will complete in 2009.		
	Summary of fish population numbers by species upstream (treatment) and downstream (control) of culverts		No	Aquatic Habitat memo, Table 3-2. Evaluation of design criteria and fish population study not completed - will complete in 2009.		
	Has the engineered aquatic-life passage culvert continued to meet design criteria post-construction for at least five years? (using statistical analysis)		No	See above - culverts have not been in place 5 years		
	Have aquatic-life passable culverts as an aggregate demonstrated increased abundance of rainbow trout in Marias and Nicholson Creeks post-construction within five years?		No	See above - culverts have not been in place 5 years		
	<i>Myers Creek Preservation/Enhancement:</i>					
	Are livestock excluded from the riparian corridor? Use statistical analysis.		Partial completion	Aquatic Habitat memo, Table 3-3 (86% functional). Statistical analysis not presented in memo.	Present basis for result in Table 3-3.	
	Has riparian vegetation been restored at the site?		No	Aquatic Habitat memo, Table 3-3. No conclusion about restoration of riparian vegetation, only change from baseline.	Present results in terms of restoration of riparian vegetation	
	Has bank erosion been reduced at the site?		No	Aquatic Habitat memo, Table 3-3. No conclusion about bank erosion reduction, only change from baseline.	Present results in terms of reduction of bank erosion	
	<i>Marias Creek Enhancement:</i>					
Have riparian restoration efforts increased channel shading? Use statistical analysis to determine effectiveness in enhancing key ecological parameters.	No	Aquatic Habitat memo, Table 3-4. Memo says 2008 was Yr 1, and there was no monitoring in Yr 0. No mention of channel shading. How will baseline be established?	Establish baseline conditions and present results of monitoring during 2008.			

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F: AMP for Development Rock Management (pg. 4-5)	Recorded development rock volumes	The objective of the monitoring plan is: (1) To determine the location, quantity and characteristics of PAG, general and marble development rock that is reporting from the underground during operations; (2) To minimize the potential for development rock to generate acid after it is placed in temporary storage on surface, or as backfill in the underground mine; and (3) To prevent the generation of poor-quality water from PAG material in the DRZ during mining and closure through the application of shotcrete as a passivation technique.	Yes	Development Rock Management memo, Table 3-3, reported in tons. Results are not summed for PAG, general, and marble for reporting period	Present sum of each type of development rock for 2008	
	Results of analytical testing conducted on development rock (total S; sulfur speciation (sulfate, sulfur and sulfide S); neutralization potential)		Yes	Development Rock memo, Tables 3-1 (sulfur concentrations) and 3-2 (NP, sulfate, sulfide S); Appendix B-1 and B-2. Should also present summary showing ranges for each type of development rock	Present summaries	
	Predicted development rock volumes for the following year		No	No predictions presented	Make predictions for 2009	
	Current stockpile volumes and classifications		Yes	pg. 7 and Table 3-3		
	Descriptions and volumes of backfill placed during the past year		No - no backfilling	pg. 7 (no backfilling had taken place as of October 31, 2008)		
	The approximate mass of marble to development rock in backfilled stopes on an annual basis		No - no backfilling	No backfilling as of October 31, 2008		
	An evaluation of the ratio between marble backfill and development rock backfill and whether it compares to that planned (Golder, 2006). Identification of additional marble source(s) if the ratio is not met and the plan to ensure that the ratio is met in future years		Partial Completion	Table 3-5 presents predicted and actual volumes, but not in ratios. There was 50% more PAG rock than predicted. AMP requires contingency plan if >20%, but no plan was presented in annual report	Create/present contingency plan for management of additional PAG rock	Table 3-5 Development Rock Memo
	The results of the annual third party inspection of the extent and success of shotcrete passivation of PAG material in the damaged rock zone above the ultimate water table		No	pg. 7: No shotcreting has taken place yet		
If necessary, an update of the geochemical block model and predicted rock types that will be mined over the life of the mine	Yes	pg. 8 - block model evaluation indicates that mine to model reconciliation is greater than 85% for marble, general, and PAG materials.		After Kinross updates the Geological Block Model - work in progress		

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G: AMP for Water Treatment Plant Operations and Stormwater Retention Ponds (pgs. 5-7)	Prepare a hydrograph showing monthly inflow from the various mine water sources	The objective of the monitoring program is to determine: (1) The capacity of the infiltration gallery receiving effluent; (2) Whether the sizing of the water treatment plant is sufficient to treat expected quantities of mine water over the life-of-the mine and during the flooding of the Gold Bowl workings; (3) Whether the selected resins will provide treatment of mine water to meet the NPDES permit limits if the groundwater quality is worse than predicted; and (4) The operation and performance of the stormwater retention ponds. The results of the monitoring would then be used to revise (adapt) the water treatment system and infiltration gallery to new expected design parameters in terms of flow and influent quality.	Partial Completion	WTP and Stormwater memo, Figure 3-7 (gw elevations for dewatering wells) and 3-8 (pumping rates for dewatering wells). Other mine water sources (to mine and WTP) are not shown	Make hydrographs showing inflow from underground mine and other sources	
	Use the groundwater flow model to compare mine inflows to inflows predicted by the groundwater flow model (and updates based on mine extent and depth)		Partial Completion	WTP and Stormwater memo, Table 3-1 (compares with SEIS, not values in AMP). Dewatering rates are higher than predicted (56 vs 30 gpm average); predicted inflow rates using model (AMP, App. G) are even lower (mean = 35.4, range = 9.7 - 47.4 gpm). AMP says to use gw flow model, and if actual inflows are not consistent, develop methodology to revise predictions - suggests model should be revisited.	Re-do groundwater model	Insufficient Operational Data
	Maintain a site water balance updated monthly with actual measurements that include wells, mine, surface water sources, and water discharged		No	Some reporting should take place, not just files on site	Present summary of monthly water balance	Kinross Files on site at WTP - Starting September 2008
	Prepare a hydrograph showing monthly flow/discharge from the treatment plant		Yes	WTP and Stormwater memo, Figure 3-29	Provide measurements on more frequent basis (only monthly shown)	Kinross Files on site at WTP - Starting September 2008
	Prepare a hydrograph of daily precipitation		Partial Completion	WTP and Stormwater memo, Figures 3-1 - 3-5, but no precipitation data from Buckhorn Mountain	Provide and compare to measurements from Buckhorn Mt	
	Prepare a hydrograph showing snowpack		Partial Completion	WTP and Stormwater, Figure 3-6. One location (Moses Mountain) - nothing from Buckhorn Mountain	Provide snowpack data from Buckhorn Mt	
	Prepare a hydrograph(s) of constituent concentrations in the influent (e.g. nitrate, sulfate, TDS, metals) compared with predicted concentrations in the Southwest Zone and Gold Bowl waters		Partial Completion	WTP and Stormwater, Figures 3-8 - 3-12. Compared with predictions for Southwest Zone only. Many missing analytes (only TDS, Cl, SO4, NO3, As, Hg, Pb, Zn included)	Make graphs for all constituents with predictions. Interpret results.	
	Prepare a hydrograph(s) of constituent concentrations in water treatment plant effluent (e.g. nitrate, sulfate, TDS, metals) compared to NPDES permit limits		Yes	WTP and Stormwater, Figs 3-13 to 3-28 and 3-30 to 3-37 (3-29 is Effluent Flow Hydrograph)	Interpret results.	
	Prepare a hydrograph of water levels in the retention ponds		No - not required	WTP and Stormwater, Section 3.4: there was no water in the stormwater pond most of the year. Thus, water levels in the retention ponds were not recorded.		
	Evaluate infiltration rates from the retention ponds and capacity with respect to the design storm		No		Conduct evaluation of retention ponds infiltrations rates and compare	
	Evaluate precipitation/snowpack/streamflow data to estimate recharge in a specific water year		No		Data collected (but no on-site precipitation or snowpack) but not evaluated relative to recharge	Weather Station not functioning - now repaired and data being collected

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G: AMP for Water Treatment Plant Operations and Stormwater Retention Ponds (pgs. 5-7) (cont.)	Evaluate groundwater levels (piezometers) to determine the mine capture zone. This information, combined with mine inflows, will be used to determine recharge over the mine area and compare with the recharge values used for the numerical groundwater flow model		Partial Completion	Mine capture zone estimated in Water Quality report, Figures 2-2 and 2-3; no evaluation of recharge estimated or compared to recharge input to gw flow model.		Capture Zone - Figs 2-2 and 2-3 Water Quality Memo. Insufficient pumping information
	Compare measured inflows to those estimated by the groundwater flow model for similar precipitation conditions and mine development extent. These will be evaluated to modify water treatment capacity or implement other measures to limit inflows if higher than anticipated recharge values occur		Partial Completion	WTP and Stormwater, Sec 3.3.1, Table 3-1. Measured dewatering rates compared to predicted in table. Dewatering rates are higher than predicted in the SEIS and in the AMP, App. G. WTP/Stormwater report, pg. 9 states "increased inflow to the MWTP does not exceed the design flow rate for the first stage. Any peaks in inflows can be handled by recirculating to the mine surge pond, if needed. If needed, additional treatment trains can be added to increase treatment capacity." But treatment capacity should be re-evaluated.		
	Compare mine water quality (influent) to the predicted inflow concentrations as presented in the Engineering Report (Golder, 2006)		Yes	WTP and Stormwater report, Table 3-2		
	Compare treated effluent quality to NPDES permit limits		Yes	WTP and Stormwater, Table 3-3; Figs 3-13 to 3-28 and 3-30 to 3-37. Legend is wrong in Table 3-3 - blue should be 'daily value is greater than Maximum Daily Permit Limit'; green should be 'monthly average greater than average monthly permit limit. Many values don't match those in Ecology's composite database.	Detection limits should be re-evaluated	
	Map the quantity of PAG and non-PAG materials exposed to the mine and compare with quantities estimated by the geological block model		Partial Completion	Development Rock Management memo, Table 3-5		Table 3-5 Development Rock Memo
	Determine the quantities of PAG and non-PAG materials on the development rock stockpiles		Partial Completion	Development Rock Management memo, Sec. 3.2.2; Kinross says data were not available, but estimates are made in DRM memo		Data not Available

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H: AMP for Upland Habitat Protection, Enhancement and Management (pg. 4-5)	<i>Evaluate data and answer the following questions annually:</i>	The goal of the adaptive management program of the Buckhorn Mt. Project is to provide direction on the management of mitigation actions over time such that full mitigation for impacts can be provided.				
	Is livestock grazing properly managed on the property?		Yes	Upland Habitat memo, Sec. 3.1.1, pg. 5		
	Has vegetation been enhanced at the site?		Partial Completion	Upland Habitat, Sec. 3.1.3, pg. 5: Riparian plantings at Pine Chee and Myers Creek sites November 2008, seeding of bare areas at Pine Chee site in October 2008. No monitoring of vegetation condition or aspen stands on Hungry Hollow, Cow Camp, Lower Nicholson parcels to date. Results not included in upland annual report, rather in Aquatic Management report and Year 1 Mine Operations Report	Combine upland and aquatic habitat AMP - confusing as separate documents and memos	
	Has snag density increased?		Partial Completion	Upland Habitat, Sec. 3.1.4. Snag creation and tree thinning at Hungry Hollow, Cow Camp, Lower Nicholson, but no monitoring to date	Monitor sites not yet evaluated	
	Is the Noxious Weed Control Plan (Golder, 2006) being performed as agreed?		Partial Completion	Upland Habitat, Sec. 3.1.2, Pine Chee noxious weeds controlled and detailed monitoring of effectiveness at Myers Creek and Pine Chee sites but not at Hungry Hollow, Cow Camp, or Lower Nicholson; results and a detailed photo record are presented in Aquatic Resource Mitigation Report and Ecological Monitoring Results 2008	Monitor sites not yet evaluated	
I: AMP for Wildlife Management Along Haul Road	No annual report required (?). Animals killed by vehicles should be reported within one day. A quarterly report will include: A description of all wildlife killed in the previous quarter. Cumulative lists of all wildlife killed. A preliminary evaluation of "trouble spots"	1. Documenting wildlife species killed by vehicles; 2. Documenting locations of any wildlife-vehicle collision; and 3. Documenting timing of any wildlife-vehicle collisions.	Yes	Wildlife Management - Haul Rd memo. Summarizes management activities and degree of completion (Table 3-1); no reported wildlife incidents in 2 months road was open. Some management activities not completed.		

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AMP Appendix/ Pg	AMP Annual Reporting Requirements	Primary Objective	Included in 2008 Reports?	Location in 2008 Reports/ Comments	Suggestions	Kinross Comments
J: AMP for Kettle River Tailing Impoundment (pg. 2-3)	Maintain a current water balance for the impoundment that includes the current water elevation and quantity stored in the impoundment	The objective of the seepage monitoring program for the Tailings Storage Facility is to determine whether the tailing pond seepage results in the potential deterioration in groundwater quality beyond that permitted in the State Waste Discharge Permit and if so, to implement adaptive management actions prior to the potential exceedences to remain in compliance. The environmental data along with information on the precipitation and weather patterns, groundwater levels, and leakage rates will be used to evaluate the effects of tailing seepage on groundwater and surface water quality.	No	No report	Prepare report	
	Preparation of a hydrograph of the fluid level in the impoundment over time;		No	No report		Work in Progress
	Preparation of a hydrograph showing daily and monthly flow (discharge) from the Tailing Storage Facility underdrain;		No	No report		
	Preparation of a water level hydrograph for each monitoring well;		No	No report		
	Preparation of chemical hydrographs for nitrate, sulfate, and TDS along with a comparison to permit limits;		No	No report		
	Preparation of hydrograph of pore pressure measured by each vibrating wire piezometer;		No	No report		
	Preparation of a hydrograph of daily precipitation;		No	No report		
	Preparation of water table maps (low groundwater and high groundwater) showing groundwater flow directions;		No	No report		
	Statistical analysis of the data to determine: Changes in flow rate in the underdrain(s) and whether there is a long-term increase in discharge (leakage) associated with increased tailing disposal in the impoundment (rise in fluid elevation in the impoundment) that suggests increased leakage; b. Trend in water quality data in the underdrain, the groundwater monitoring wells and surface water and whether the trend could result in an exceedence of the permit limit; and c. Trend in pore pressures in the vibrating wire piezometers and whether the changes could result in potential stability issues in the embankment.		No	No report		

Summary of Annual Reporting Requirements Identified in the Hydrologic Monitoring Plan

Monitoring Parameter	HMP Annual Reporting Requirements	Primary Objective	Included in 2008 Reports?	Location in 2008 Reports/ Comments	Suggestions	Kinross Comments
General <i>Hydrologic Monitoring:</i>	Monitoring activities and progress reports annually by March 15th, coordination meeting in first quarter of year at Buckhorn to present summary of year's monitoring and discuss adequacy of monitoring plan and modifications that may be required	Summary of monitoring results, discuss adequacy of monitoring plan, modifications that may be required	Partial completion	See missing elements from HMP and AMP. Little if any discussion of monitoring results, adequacy of plan or modifications	Need another coordination meeting	
Precipitation and Weather Monitoring	Summary of precip and weather data from Buckhorn Mt; correlation analysis between Buckhorn Mt and Republic rain gauges	1. Determine monthly and annual precipitation and snow pack. 2. Use precip to evaluate changes in streamflow and groundwater	No	Precipitation and snow data extrapolated from off-site stations	Provide report showing how off-site data correlate with limited Buckhorn Mt data	See Seeps and Springs AMP Report, Section 3.1. Republic data provided. No Buckhorn data for 2008. Buckhorn precipitation data not available because of equipment malfunction. No correlation possible.
Water Use	Water use statistics and summary of photos and irrigated acreage	Ensure water used is consistent with water rights	Partial Completion	Water Treatment Plant and Stormwater Retention Ponds, Section 3.3. Statistics only for dewatering wells; no data/statistics for: Newman Ranch well; domestic well nr Lower Portal; SW Zone lowest sump; GB lowest sump, ore/WR stockpile drainage; Lost Cr Ranch well; Leslie Ranch SW diversion. No photos provided.	Provide data and statistics for all locations, as required; provide photos	Data for dewatering wells presented. Not available for Newman Well. Data being collected by Kinross in 2009. - Section 3.3
Surface Water	Compilation of streamflow data	Document effects of dewatering and mitigation on streamflow	Partial completion	Mine Dewatering and Water Supply Streamflow Impacts - Tables 3-3 - 3-9 and Figures 3-8 - 3-14. Missing the following locations for streamflow: SW-1, SW-9, SW-4 (OHA), SW-12 (OHA), SW-13 (OHA), SW-15	Provide streamflow data for all locations, as required	Adaptive management plan for Mine Dewatering and Water Supply impacts to Streamflow - tables and figures
Seeps and Springs	Compilation of seep/spring discharge data	Document effects of dewatering and mitigation on the physical condition of seeps and springs	Partial completion	Seeps and Springs, Figures 3-7 - 3-23 (complete) and Tables 3-2 and 3-3 (incomplete). No photos of springs. Only averages were reported in tables - should show measurements from each month. Photos are missing. How are seeps and springs distinguished- dewatering could change a spring to a seep and change meas method to visual.	Provide monthly measurements for each seep/spring and June photos	Mitigation for impacts to Seeps and Spring from Mine Dewatering - tables and figures

Summary of Annual Reporting Requirements Identified in the Hydrologic Monitoring Plan

Monitoring Parameter	HMP Annual Reporting Requirements	Primary Objective	Included in 2008 Reports?	Location in 2008 Reports/ Comments	Suggestions	Kinross Comments
Groundwater	Report on groundwater levels submitted annually, including hydrographs from wells and piezo and water table of mine area for high and low groundwater conditions.	Determine changes in groundwater associated with dewatering and mitigation activities; evaluate predictions in groundwater flow model.	Partial completion	Water Quality, Figures 2-2 and 2-3 show groundwater levels under high and low groundwater conditions. Well and piezometer hydrographs not included	Provide well and piezometer hydrographs as required; make specific element for monitoring of groundwater levels in AMP; water levels should not be in water quality report	Monthly DMR reports. Future reports will have hydrographs of piezometers.
Water Treatment System Effluent	Inflow and outflow volumes from WWTP; flow data as required in NPDES permit or necessary to respond to actions in AMP	Measure treated effluent volumes to account for water discharged at outfalls	Partial completion	WTP and Stormwater memo, Figure 3-29 provided monthly treated effluent discharged; more frequently measurements not presented; inflows to WTP not presented	Provide volumes as required	Stormwater Retention Ponds, Section 3.3.1. Water Treatment Plant Operations and Stormwater Retention Ponds
Water Quality Monitoring:						
Surface Water	Report water quality data in annual reports; provide turbidity data from Marias Cr to USFS monthly; report as required by NPDES permit or as necessary to respond to actions in AMP	Document any impacts on surface water quality resulting from mine operations; demonstrate compliance with applicable permits.	Substantial completion	Water Quality, Figures 3-32 - 3-63 and Appendix A for Be. No water quality plots for ammonia	Add ammonia. SW-1, SW-2, SW-15 have no water quality - consider adding as part of AMP; consider adding Na to water quality constituents	Water Quality Changes due to Mining; Section 3.3 and figures
Seeps and Springs	Report water quality data in annual reports; report as required by NPDES permit or as necessary to respond to actions in AMP	Document any impacts on seep/spring water quality resulting from mining operations	Yes	Water Quality, Appendix B		Water Quality Changes due to Mining, Appendix B
Groundwater	Report water quality data in annual reports; report as required by NPDES permit or as necessary to respond to actions in AMP	Document any impacts on groundwater quality resulting from mining operations, including the infiltration of treated water; wells used as early warning for surface water quality protection	Partial completion	Water Quality, Figures 3-1 - 3-31; Appendix A for Be. No water quality plots for MW-11, MW-12 (not required under NPDES), domestic well, and 5 dewatering wells; no water quality plots for piezometers P-5 through P-15	Add plots for missing wells and piezometers; consider adding Na to water quality constituents and MW-11 and MW-12 to list for water quality sampling	Water Quality Changes due to Mining; Section 3.2 and figures
Mine Sumps	Report water quality data in annual reports; report as required by NPDES permit or as necessary to respond to actions in AMP	Meet requirements of NPDES permit; provide information for use in Adaptive Management	No	Needs element in AMP - should be compared to predicted mine water quality	Include in Water Quality report	Not included - available in Monthly DMR

Summary of Annual Reporting Requirements Identified in the Hydrologic Monitoring Plan

Monitoring Parameter	HMP Annual Reporting Requirements	Primary Objective	Included in 2008 Reports?	Location in 2008 Reports/ Comments	Suggestions	Kinross Comments
Stormwater	Report water quality data in annual reports; turbidity reported monthly to USFS, report as required by NPDES permit, mine access road SWPPP, operational mine SWPPP, or as necessary to respond to actions in AMP	Document any impacts on surface water quality resulting from stormwater management and mine access roads; demonstrate compliance with permits	Partial completion	WTP and Stormwater, Table 3-4 for SSW3 and SSW4; Figures 3-64 - 3-70. Did not include results from non-industrial stormwater at SSW7 and SSW8	Add SSW7 and 8 to report	Stormwater Retention Ponds, Section 3.4. Water Treatment Plant Operations and Stormwater Retention Ponds
Mine Water Treated Effluent	Treated effluent data presented in quarterly reports, monitoring data reported as required by NPDES permit (see Table 3-1d), or as necessary to respond to AMP actions	Obtain information about adequacy of treatment and operational parameters; optimize treatment; establish trend information for system operational parameters; demonstrate compliance with NPDES permit; respond to actions in AMP	Partial completion	WTP and Stormwater; Section 3.3.3, Table 3-3 and Figures 3-13 - 3-37; Also Water Quality, Figures 3-71 - 3-95. Table 3-3 only includes monthly averages, not summary of daily maxima	Include daily maxima and compare to NPDES permit limits	Stormwater Retention Ponds, Section 3.3.3/3.5. Water Treatment Plant Operations and Stormwater Retention Ponds
Reclamation and Post-Closure Monitoring:						
Surface Water	Report surface water quantity and quality in annual monitoring reports; report as required by NPDES permit or as necessary to respond to AMP actions	Document changes in streamflow associated with mine dewatering and flooding, and any impacts on surface water quality from reclamation and mine flooding and to demonstrate compliance with permits	Not required until end of mining	Not required		
Seeps and Springs	Report spring/seep quantity and quality in annual monitoring reports; report as required by NPDES permit or as necessary to respond to AMP actions	Document changes in seep/spring flows associated with mine dewatering and flooding, and any impacts on surface water quality from reclamation and mine flooding and to demonstrate compliance with permits	Not required until end of mining	Not required		

Summary of Annual Reporting Requirements Identified in the Hydrologic Monitoring Plan

Monitoring Parameter	HMP Annual Reporting Requirements	Primary Objective	Included in 2008 Reports?	Location in 2008 Reports/ Comments	Suggestions	Kinross Comments
Groundwater	Report groundwater data in annual monitoring reports; report as required by NPDES permit or as necessary to respond to AMP actions	Document changes in groundwater levels associated with mine dewatering and flooding, and any impacts on groundwater water quality from reclamation and mine flooding and to demonstrate compliance with permits	Not required until end of mining	Not required		
Mine Sumps	Report mine sump/pool water quality data in annual monitoring reports; report as required by NPDES permit or as necessary to respond to AMP actions	To meet requirements of NPDES permit and provide information for use in adaptive management	Not required until end of mining	Not required		

Summary of Annual Reporting Requirements Identified in the Ecological Monitoring Plan

Annual Reporting Requirements	Reporting Years	Primary Monitoring Objective	Cross Reference with Adaptive Management Plan	Done in 2008?	Comments/ Location in 2008 Report
The monitoring program's activities will be documented and monitoring reports will be provided to the appropriate agencies on an annual basis. Crown/Kinross will provide an annual ecological monitoring report by March 15th of each year or at least two weeks prior to the annual meeting.	Annually	These reports will summarize mitigation and ecological monitoring activities completed during the past year, results of field surveys, proposed activities for the current year, and exceptions or modifications to the Monitoring Plan.	Aquatic Habitat (Appendix E)	Yes	Adaptive Management Plan Aquatic Habitat Report Memo
Restoration of Fish Passage (Nicholson/Marias Creek). Restore fish passage by replacing or improving 4 culverts to improve passability; improve habitat 20 feet up and downstream from culvert work	After years 1, 3, and 5; final report after year 10.	Monitor fish passage design (culverts will be monitored to ensure passability by all aquatic organisms).	Aquatic Habitat (Appendix E)	Partial completion	3 culverts on Marias Creek are completed, one is not yet finished. Two culverts on Nicholson Creek are not yet finished (AMP Aquatic Habitat Report pg. 3). Survey of as-built fish passage design and fish population monitoring not completed, awaiting permit approval (AMP Aquatic Habitat Report pg. 7).
Stream Enhancement on Lower Marias Creek. Line the channel (stabilize hydrology); restore riparian habitat primarily through revegetation.	After years 1, 3, and 5; final report after year 10.	Streamflow, vegetation survival, percent cover, percent shading.	Aquatic Habitat (Appendix E)	Partial completion	Report pending. Pg 8 states: "These reports will summarize mitigation and ecological monitoring activities completed during the past year, results of field surveys, proposed activities for the current year, and exceptions or modifications to the Monitoring Plan. These reports will summarize mitigation and ecological monitoring activities completed during the past year, results of field surveys, proposed activities for the current year, and exceptions or modifications to the Monitoring Plan."
Sediment Transport and Deposition in Marias Creek	Annually; final report after year 10.	Monitor in-channel fine sediment deposition. Determine effectiveness of road BMPs and monitor the impacts of construction and mining on sediment deposition in the Creek.	Marias Creek Sediment (Appendix D)	Partial completion	See Marias Creek Sediment AMP Report results (Appendix D)

Summary of Annual Reporting Requirements Identified in the Ecological Monitoring Plan

Annual Reporting Requirements	Reporting Years	Primary Monitoring Objective	Cross Reference with Adaptive Management Plan	Done in 2008?	Comments/ Location in 2008 Report
Monitor Fish Populations in Marias Creek. Improve fish passage by replacing 4 culverts on Marias Creek	Annually	Monitor fish abundance upstream and downstream of culverts, max residual pool depth, channel gradient, channel width (at riffles).	Aquatic Habitat (Appendix E)	No	Need permit from WDFW for electrofishing survey. Will monitor fish populations in 2009 as soon as snow/ice conditions and RBT spawning periods OK. (p. 7 Aquatic Habitat AMP Report)
Habitat Protection/Enhancement on Myers Creek. Long-term rehabilitation project on 97 acres. Mitigation for impacts of mine dewatering on wetlands and seeps and springs. Plant riparian vegetation (500 plants/acre). Invasive species control and evaluation.	In years 1, 3, 5. A final report after year 10.	Assess effectiveness of livestock exclusion fence, channel form and function. Maintain fence structure, function. Monitor livestock trespassing/vandalism. Photo document project. Evaluate vegetation composition. Monitor effectiveness of invasive species control.	Aquatic Habitat (Appendix E)	Partial completion	Section 3.2 Aquatic Habitat Report (AMP), pg. 7-8. Photo documentation not included in this report. Two other reports submitted (ENSR, 2007; Golder, 2009b)
Pine Chee Wetlands Preservation/Enhancement. Build a livestock exclusion fence. Plant riparian vegetation (500 plants/acre); reduce % bare ground on site. Treat for invasive species and/or noxious weeds on site.	After years 1, 3, and 5; final report after year 10.	Monitor effectiveness of livestock exclusion fence (structure and function, livestock trespassing/vandalism); vegetative cover, seedling cover, wetland restoration, invasive species control measures. Streambank condition.	Aquatic Habitat (Appendix E)	Partial completion	Section 3.2 Aquatic Habitat Report (AMP), pg. 7-8. Photo documentation not included in this report. Two other reports submitted (ENSR, 2007; Golder, 2009b)
Guzzler Construction and Operation. To mitigate for loss of wildlife drinking water sources due to mine dewatering; construction will be placed away from outcrops and on previously disturbed areas.	Annually	Monitor guzzler structure and function. Verify by visual inspection and photographic record that guzzlers are effectively providing water for wildlife in place of natural watering holes affected by mine dewatering.	Upland Habitat (Appendix H)	Partial completion	Pg. 5 of Upland Habitat AMP Report states "Guzzlers and livestock drinking sites were established in Fall 2008. Monitoring of the guzzlers is scheduled to continue when weather conditions permit access to the sites."
Flow Augmentation at Roosevelt Adit and Headwaters Marias Creek. To mitigate for reduced groundwater discharge to a 9-acre wetland. Treated mine water will be discharged to the wetlands and headwaters.	Annually; final report after year 10.	Pipeline inspection, water depth and area of headwater wetlands, streamflow discharge at representative stations.	Streamflow Impacts (Appendix B)	Partial completion	See AMP for Mine Dewatering and Water Supply Impacts to Streamflow (Appendix B)
Stormwater Pond Modification	Annual reports in years 8, 9 (after installation), final report after year 10.	Assess as-built design of structure. Monitor/maintain pond structure and function. Evaluate pond use by livestock and wildlife.	Aquatic Habitat (Appendix E)	No	Too early (not expected)

Summary of Annual Reporting Requirements Identified in the Ecological Monitoring Plan

Annual Reporting Requirements	Reporting Years	Primary Monitoring Objective	Cross Reference with Adaptive Management Plan	Done in 2008?	Comments/ Location in 2008 Report
Monitoring of Ecological Function of Seeps/Springs. Adaptive management to develop a mitigation plan to compensate for effects of dewatering on groundwater-fed wetlands.	Annually; final report after year 10.	Monitor effect of reduced groundwater discharge on the ecology of wetlands.	Seeps and Springs (Appendix A)	Partial completion	See Mine Dewatering Impacts to Seeps and Springs (Appendix A)
Monitoring Activities - Mine Site		Monitor wildlife mortality on the Mine Site.	Aquatic Habitat (Appendix E)	No	No reporting requirements listed, did not find mentioned in any reports.
Monitoring Activities - Haul Road	Quarterly summary reports. Each incident reported ~immediately.	Monitor wildlife-vehicle collisions and wildlife mortality on the Haul Road.	USFS Haul Road Annual Report (Appendix I)	Yes	USFS Haul Road Annual Report - summarizes quarterly reporting (no incidents)
Monitoring Activities - Hungry Hollow. Reseed and plant riparian vegetation (if necessary).		Monitor habitat condition, evaluate condition of riparian vegetation, drinking sites, snag density, fencing and gates, noxious weeds.	Upland Habitat (Appendix H)	No	Pg. 5 "No specific monitoring of noxious weed control has been conducted."
Monitoring Activities - Lower Nicholson Creek. Reseed and plant riparian vegetation (if necessary).		Monitor riparian vegetation condition, snag density, maintain gates, noxious weeds.	Upland Habitat (Appendix H)	No	Pg. 5 "No specific monitoring of noxious weed control has been conducted."
Monitoring Activities - Cow Camp. Reseed and plant riparian vegetation (if necessary).		Monitor habitat condition, riparian vegetation, snag density, fencing and gates, noxious weeds.	Upland Habitat (Appendix H)	No	Pg. 5 "No specific monitoring of noxious weed control has been conducted."
Note: Year One is defined as November 1, 2007 through October 31, 2008. All Year 1 reports should be submitted.					