



April 28, 2023

Mr. Dayne Doucet
Consolidated Mining Permit Lead
Oregon Department of Geology and Mineral Industries
Mineral Land Regulation & Reclamation
229 Broadalbin St SW
Albany, Oregon 97321

RE: Response to Comments 297 and 459 in October 20, 2022, Comments for the Consolidated Permit Application (CPA), Grassy Mountain Mine Project

Dear Mr. Doucet:

This letter is in response to Comments 297 and 459 in DOGAMI's October 20, 2022, CPA comments spreadsheet related to the CPA appendix, *Ecological Risk Assessment* (ERA).

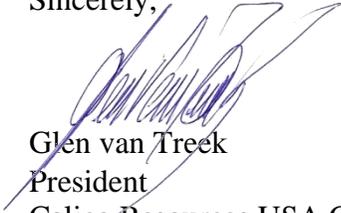
- **Comment 297:**
The Oregon Department of Environmental Quality (ODEQ) proposed a revision to the ERA. This request suggested that the ERA be revised with information on chemical toxicity on wildlife, including concentrations, exposure pathways, and other information necessary for ODEQ and the Oregon Department of Fish and Wildlife (ODFW) to determine toxicity effects on wildlife.
- **Comment 459:**
The U.S. Fish and Wildlife Service (USFWS) requested confirmation that the source of all the water required to operate the facility will be from precipitation and make-up water, with no surface water or groundwater to be required. Further, the Technical Review Team (TRT) requested specific updates to the ERA.

The revised ERA was submitted to DOGAMI on March 22, 2023. The attached comment summary sheets present Calico's responses in detail.

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Please contact me at (775) 625-3600, glen@paramountnevada.com if you have questions or need clarification.

Sincerely,



Glen van Treek
President

Calico Resources USA Corp./Paramount Gold Nevada Corp.
(775) 625-3600
glen@paramountnevada.com

Att: Comment Summary Sheets

**Attachment
Comment Summary Sheets**

Comment Number: 297

Comment Number: 297		Category: 1	Status: C
Topic: Wildlife and Vegetation		CPA Reference: Consolidated Application, Section 3.3.13.3, pg.188	
Commentor: DEQ			
<p>Comment: Insufficient information to determine toxicity and impacts of chemical processing solutions and wastewaters on wildlife</p> <p>Proposed Resolution: Please submit information on chemical toxicity on wildlife, including concentrations, exposure pathways, and other information necessary for ODEQ and ODFW to determine toxicity effects on wildlife.</p>			
Initial Response to Comment: Ecological risk assessment was completed and is provided in Appendix F of the CPA.			
Stantec – Comment Addressed as Indicated?	Stantec – Preliminary Assessment – Sufficient Response?	TRT Response:	
No. The ecological risk assessment has not been expanded or improved from the original CPA.	No. Ecological risk assessment is simplistic and lacks sufficient detail. In addition, it is unclear if cyanide presented in tables is total or WAD cyanide. The EE will more thoroughly examine the potential ecological toxicity and risk of process chemical	ODFW concurs with these concerns. See new comments below regarding ODFW concerns on wildlife toxicity and the inadequacy of the Wildlife Protection Plan. Recommend confer with DEQ and ODFW.	
Preliminary Response to Comment: ODFW requests clarification/additional information regarding the ERA. See new comments 424, 460 and 461.			
Agency Comment: NA			
Response to Comment (Feb 2023): NA			
Response to Comment (Mar 2023): NA			
<p>Response to Comment (Apr 2023): CPA Appendix G, <i>Ecological Risk Assessment</i> (ERA), was revised to include additional details as mentioned in the comment and was submitted to DOGAMI on March 22, 2023. The ERA presents a conceptual site model that describes the ecological receptors with the potential to have significant exposure to supernatant (i.e., birds and mammals). DEQ ecological screening levels are used in risk estimates. Chemical-specific hazard quotients (HQs) are presented for wildlife. The revised ERA shows that estimated maximum concentrations of chemicals in supernatant are below DEQ screening levels protective of wildlife (birds and mammals) exposed to water through drinking. Based on cumulative risk estimates in the updated ERA, chemicals in supernatant are not expected to cause unacceptable adverse effects to wildlife populations.</p> <p>The form of cyanide in the TSF and Reclaim Pond is total cyanide. Tailings are treated to degrade Weak Acid Dissociable (WAD) cyanide and free cyanide before being pumped to the TSF. Also, WAD cyanide in the TSF will be readily degraded by sunlight and natural bacteria. Therefore, the ecological evaluation focused on total cyanide in supernatant.</p>			

Comment Number: 459

Comment Number: 459		Category: 1	Status: B
Topic: Ecological risk to wildlife		CPA Reference: Ecological Risk Assessment (p.5 Section 3.2)	
Commentor: USFWS			
Please confirm that the source of all the water required to operate the facility will be from precipitation and make-up water, with no surface water or groundwater to be required. Clarify what is the source of the "fresh make-up water", as it appears from Figure 3-1 to be completely from the reclaim pond.			
Initial Response to Comment: The water sources for the mine are groundwater from mine dewatering and from production wells, precipitation, and storm runoff. Water recycling is a key component of the mine design and operating procedures. Section 3.10 of the CPA describes the water management plan and presents a site water balance that presents a quantitative description of the routing and storage of water for the mine.			
Stantec – Comment Addressed as Indicated? NA	Stantec – Preliminary Assessment – Sufficient Response? NA	TRT Response: Per the information provided in the applicant's response (and section 3.9 and 3.10 in the CPA), Figure 3-1 in the Ecological Risk Assessment appears somewhat misleading as per the previous comment. Please revise Figure 3-1 and description in section 3.2 for clarity, adding or identifying the groundwater component.	
Preliminary Response to Comment: NA			
Agency Comment: Per the information provided in the applicant's response (and section 3.9 and 3.10 in the CPA), Figure 3-1 in the Ecological Risk Assessment appears somewhat misleading as per the previous comment. Please revise Figure 3-1 and description in section 3.2 for clarity, adding or identifying the groundwater component.			
Response to Comment (Feb 2023): The ecological risk assessment has been revised to include more detail on the sources of water for the mine. The revised ecological risk assessment will be included with the next submittal of the Consolidated Permit Application.			
Response to Comment (Mar 2023): NA			
Response to Comment (Apr 2023): The revised ERA was submitted to DOGAMI on March 22, 2023.			