

Oregon Consolidated Application and Permitting Process – Chemical Process Mine Grassy Mountain Consolidated Application Completeness

Completeness is designed to avoid a situation where an agency would have to deny a permit *for lack of information*. Once the application is complete, the agency then must decide whether the information is sufficient to meet the standards required for approval.

General guidelines for commenting on the completeness of the Consolidated Permit Application:

Category 1 - Required Content: Category 1 comments address major data gaps in the information provided. Are all of the elements required by individual agency permits and applicable statute ([ORS 517.971](#)) and rules ([OAR, 632-037-0045 to 0077](#)) present? For Permitting Agencies, is all necessary information **present** (not necessarily satisfactory) for agencies to draft permits that meet statutory requirements? For Cooperating Agencies, is all necessary information **present** (not necessarily satisfactory) for agencies to draft DOGAMI permit conditions that meet statutory requirements?

Category 2 - Document Completeness: Category 2 comments identify any issues with the completeness, consistency, or accuracy of the work as presented in the consolidated permit application. Are digital files useable, maps and figures clear and legible, and cross-referencing complete and accurate? Is the documentation of the work complete? Are the data, analyses, and plans presented in a manner that allows the reviewer to verify their accuracy and assess their purpose, effects, and suitability? Is the document free of substantive errors and contradictory or ambiguous statements? Are plans and procedures fully detailed?

Category 3 - Draft Permit Considerations: Category 3 comments are technical considerations that will have to be addressed as part of the permit but meet the Category 1 or 2 definitions required for completeness. Identified Category 3 issues may also include requirements for additional testing, analysis, monitoring, or documentation during mine development and/or operation. For example, there could be the need for monitoring plans during operations, data collection requirements during mine plan changes, identified data gaps filled when new geologic materials are accessible, etc.

Category 4 - Best Practices: Category 4 comments are identified issues with the clarity and presentation of the information in the baseline reports and application. This can include substantive and non-substantive errors. Does the application and contained baseline reports and other technical information conform to best (or standard) current practices for presentation of information and usability? Does the electronic format conform to required federal standards? Is the document presentation clear and transparent?

Comment #	Section #/Page #	Comment	Comment Category	Proposed Resolution

