Coordination of State and Federal Permitting Requirements

Randy Jones, DOGAMI
Pat Ryan, BLM
Why Collaborate?

Oregon’s chemical process mining laws and federal regulations strongly encourage agreements and close coordination between the State and, for Grassy Mountain, the BLM

Memorandum of Understanding (January 2017)

- Coordinated permitting to the fullest extent possible
  - Local Land Use
  - Consolidated Permit Application
  - Plan of Operations
- Avoidance of inconsistent requirements
- Connected contractor efforts (State EE and federal EIS) – manage preparation timeliness
- Maximize data sharing
- Maximize coordination of state and federal financial security requirements

Coordinate monitoring and mitigation
What is an example of “avoidance of duplication?”

Environmental Analysis of Chemical Mining Project
National Environmental Policy Act Environmental Impact Statement
State of Oregon Environmental Evaluation

August 2018

<table>
<thead>
<tr>
<th>NEPA - EIS</th>
<th>Components</th>
<th>Period Required</th>
<th>State of Oregon Process - EE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advanced Notice</td>
<td>OSO aware of project through all previous phases</td>
<td></td>
<td>DOGAMI serves as lead State Agency</td>
</tr>
<tr>
<td>Coordination with Oregon</td>
<td>BLM continues communication with proponent and County presentations.</td>
<td>State and Interior jointly “track” Pre-Feasibility Study and Consolidated Application; jointly seek public notice/input opportunities via PCC meeting(s)</td>
<td>Similar opportunities for public involvement; desire to identify public input milestones shared with BLM</td>
</tr>
<tr>
<td>State of Oregon Office of BLM</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Informal Public Scoping</td>
<td>V</td>
<td></td>
<td>Similar requirements for “consultation”</td>
</tr>
<tr>
<td>Tribal Communication</td>
<td>30 Day Review by BLM; currently returned as incomplete</td>
<td>Host dedicated State Agency coordination effort(s) to: 1) ID overlap between EE and PdQ, and 2) to review revised PdQ</td>
<td>Consol. App., 90-day review for completeness; public involvement and comment included – State App requires PdQ (Operating Plan)</td>
</tr>
<tr>
<td>Plan of Operation Completeness Review</td>
<td>1-4 Months Prep and scheduling. Once approved, SO sends to BLM. New direction requires very quick turn around if advanced work done well</td>
<td>To reduce duplication, incorporate Federal NAO to Consolidated Permit Application completeness review: TRT defines completeness.</td>
<td></td>
</tr>
<tr>
<td>Federal Register Notice of</td>
<td>A well designed plan of Environmental Review is compiled and shared with Oregon: BLM State Director, Inc: NOA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Availability (NOA)</td>
<td>(Draft) Purpose and Need Comm Plan Map</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cooperating Agencies</td>
<td>BLM has invited appropriate public entities to be cooperating agencies in the development of alternatives and analysis. Any significant project milestones trigger PCC meetings: EE and Socioeconomic Analysis USE Project Coordinating Committee (federal/state/tribal/local) and Technical Review.</td>
<td>Use Project Coordinating Committee (federal/state/tribal/local) and Technical Review.</td>
<td></td>
</tr>
</tbody>
</table>
Communications and Public Involvement

DRAFT (Rev 8/6/18)

Calico Resources USA Corp. – Grassy Mountain
Chemical Process Mining Permitting
Strategic Communications Plan

Department of Geology and Mineral Industries
Mineral Land Regulation & Reclamation

Project Coordinating Committee - August 2018
Thank you!

Randy Jones, Chemical Process Mining Coordinator
DOGAMI, Randy.A.Jones@oregon.gov

Thomas ‘Pat’ Ryan, Field Manager, Malheur Field Office
BLM, t1ryan@blm.gov