

Coordination of State and Federal Permitting Requirements

Randy Jones, DOGAMI Pat Ryan, BLM

Why Collaborate?

Oregon's chemical process mining laws <u>and</u> federal regulations strongly encourage <u>agreements and close coordination</u> 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

NEPA - EIS	Components	Period Required	State of Oregon Process - EE
Advanced Notice			
Coordination with Oregon State Office of BLM	OSO aware of project through all previous phases		DOGAMI serves as lead State Agency
Informal Public Scoping	Vale BLM continues communication with proponent and County presentations.	State and Interior jointly "track" Pre-Feasibility Study and Consolidated Application; jointly seek public notice/input opportunities via PCC meeting(s)	Similar opportunities for public involvement; desire to identify public input milestones shared with BLM
Tribal Communication			Similar requirements for "consultation"
Plan of Operation Completeness Review	30 Day Review by BLM; currently returned as incomplete	Host dedicated State Agency coordination effort(s) to: 1) ID overlap between EE and PoQ and 2) to review revised PoQ.	Consol. App.: 90-day review for completeness; public involvement and comment included – State App requires Poo (Operating Plan)
Federal Register Notice of Availability (NOA)	A well designed plan of Environmental Review is compiled and shared with Oregon BLM State Director, inc: NOA (Draft) Purpose and Need Comm. Plan Map	1-4 Months Prep and scheduling. Once approved, SO sends to WO. New direction requires very quick turn around if advanced work done well	To reduce duplication, incorporate Federal NAO to Consolidated Permit Application completeness review: TRT defines completeness.
Cooperating Agencies	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



Oregon Chemical Process Mine Consolidated Permitting Organizational Chart Calico Resources USA Corp – Grassy Mountain

OREGON DEPT OF JUSTICE

Advises on the process
Jesse Ratcliffe

OREGON DEPT OF GEOLOGY & MINERAL INDUSTRIES

Oversees coordination of the process

Randy Jones

Bob Brinkmann

PROJECT CONSULTANTS

Cardno – Adam Bonin
Barney & Worth – Libby Barg /
Janet Gillaspie

PROJECT COORDINATING COMMITTEE (PCC)

Coordinates county, state, and federal permitting requirements to avoid contradiction and duplication

Oregon Dept of Geology & Mineral Industries (DOGAMI)

Oregon Dept of Environmental Quality (DEQ)

Oregon Water Resources Dept (WRD)

Oregon Dept of State Lands (DSL)

Oregon Dept of Fish & Wildlife (ODFW)

Oregon Dept of Agriculture (ODA)

Oregon State Historic Preservation Office (SHPO)

Oregon Dept of Land & Conservation Development (DLCD)

City of Vale • Malheur County • City of Nyssa

United States Bureau of Land Management (BLM)

United States Environmental Protection Agency (EPA)

United States Mine Safety & Health Administration (MSHA)

United States Fish & Wildlife Service (USFWS)

Tribal Nations – Burns Paiute Tribe

Regional Solutions (Eastern Oregon)

TECHNICAL REVIEW TEAM (TRT)

Establishes guidelines and coordinates with applicant in use of baseline data collection methodologies; determines compliance of proposed mining operation with requirements

DOGAMI

DEQ*

WRD

DSL

ODFW

ODA

SHPO

DLCD

BLM

*Includes Water Quality (WQ), Air Quality (AQ), Solid Waste (SW) and Laboratory (LAB) Programs

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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





Thank you!

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