



January 4, 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: Submittal of Documents in Response to Comment #83 in October 20, 2022,
Comments for the Consolidated Permit Application, Grassy Mountain Mine Project**

Dear Mr. Doucet:

This letter accompanies the submittal of the document listed below in response to Comment #83 in the October 20, 2022, Comments for the Consolidated Permit Application.

- TRT Cultural Resource work plan adjustment 2023-01-03.pdf

The document submittal record for Comment #83 is attached. Please see the “Revised Response to Comments (Jan 2023)” information for your consideration.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Glen van Treek', is written over a horizontal line.

Glen van Treek
President

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

Att: Document Submittal Record

Attachment
Document Submittal Record

Document Submittal: TRT Cultural Resource work plan adjustment 2023-01-03.pdf

Comment Number: 83	Category: 1	Status: C (Preliminary Resolved)
Comment: The Oregon State Historic Preservation Office (SHPO) is coordinating with the United States Bureau of Land Management (BLM) to review cultural resource survey information for the project area. As of February 12, 2020, during the Project Coordinating Committee (PCC) meeting in Ontario, Oregon, that information was not yet provided to SHPO by the BLM. Proposed Resolution: Continue coordination efforts with BLM and Oregon SHPO. Provide Oregon SHPO with a Cultural Resources Baseline Data Report to review for completeness as part of a revised CPA.		
Initial Response (Dec 2021): The TRT will need to formally approve the Cultural Resources Baseline Data Report. SHPO, BLM are coordinating with DOGAMI to present review comments as to submit to the TRT.		
Stantec Comment: Coordination with BLM and SHPO continues, as the Cultural Resources BDR has not been approved. TRT Response (Oct 2022): N/A		
Preliminary Response to Comment (Nov 2022): N/A		
Agency Comments (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): Calico submitted a memorandum regarding “Grassy Mountain Mine Environmental Baseline Study Work Plans Modification Request to the Cultural Resources Baseline Work Plan” to the State of Oregon, Technical Review Team on January 3, 2023. The rationale for the request follows: “Baseline studies are intended to provide a preliminary understanding of the resources in the project area. The Cultural Resources BDR met this intent by presenting an inventory of cultural resources within the APE. Section 106 consultation with the Burns Paiute Tribe and the Tribal Study will provide additional information on the prehistoric context, cultural value, and expectantly, on specific identified sites. As a result, more comprehensive evaluations of NRHP eligibility will be conducted and additional SHPO-requested information can be provided. The modified Work Plan will recognize the completed Cultural Resource BDR as finalized and the NRHP eligibility recommendations with which the SHPO concurred. Deferring evaluation of significance and effect analyses to the Environmental Evaluation will allow these evaluations to continue, informed by Section 106 consultation, as the NEPA process continues. This will result in more engaging evaluation process and provide a greater opportunity for consensus among consulting and interested parties.”		