



January 30, 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 322 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 322 in the October 20, 2022, Comments for the Consolidated Permit Application. Please note that the Cyanide Management Plan (Appendix D8) edits are tracked in the attached document and the finalized plan will be stamped and hyperlinked with the CPA submission.

- D8Cyanide Mgnt Plan Draft Rev G 2023-01.pdf

The document submittal record for Comment 322 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 the printed name and title.

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: D8Cyanide Mgmt Plan Draft Rev G 2023-01.pdf

Comment Number: 322		Category: 1	Status: B (Not Resolved)
Topic: Wildlife and Vegetation		CPA Reference: Cyanide Management Plan, Page 5	
Comment: USFWS			
The CMP cites the Wildlife Mitigation Plan in reference to “Standard of Practice 4.4 Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.” and “Standard of Practice 4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.” No mention of cyanide management is included in the Wildlife Mitigation Plan.			
Proposed Resolution: The cyanide management plan and wildlife mitigation plan must address measures to protect fish and wildlife from exposure to cyanide.			
Initial Response (Dec 2021): Updated the Cyanide Management Plan to include wildlife protection measures. See Appendix D8 of the CPA for the Cyanide Management Plan. The Wildlife Protection Plan, also provided in Appendix D to the CPA, discusses cyanide storage in relation to wildlife protection.			
Stantec – Comment Addressed as Indicated? Yes. Technically, the cyanide management plan references the wildlife protection plan. However, Cyanide storage is not discussed relative to wildlife protection.	Stantec – Preliminary Assessment – Sufficient Response? Yes		TRT Response (Oct 2022): On page 6, the CMP states that the project with, “...satisfy the more stringent Oregon standard” of 30 mg/L” but then reverts to the Code guideline of 50 mg/L in this statement, “There are no open waters where WAD cyanide will exceed the Code guidance of 50 mg/L in the Grassy Mountain process plant design.” So it is unclear which concentration will be used for the standard.
Preliminary Response to Comment (Nov 2022): N/A			
Agency Comment (Jan 2023): The cyanide concentration must be clarified so that USFWS can accurately evaluate potential impacts of proposed activities and potential effectiveness of proposed mitigation. The discrepancy in information presented presents a major data gap consistent with Category 1.			
Revised Response to Comment (Jan 2023): The CMP text has been updated to indicate that the concentration of WAD cyanide in discharge to the TSF will have an operating target of less than 15 mg/L. This is lower than the maximum concentration allowed by the Code (50 mg/L), and half of the not-to-exceed value that is allowed by Oregon Administrative Rules (30 mg/L).			
Please note that the Cyanide Management Plan (Appendix D8) edits are tracked in the document submitted for review on 1/30/2023. The finalized plan will be stamped and hyperlinked with the CPA submission.			