



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 #86 in October 20, 2022,
Comments for the Consolidated Permit Application, Grassy Mountain Mine Project**

Dear Mr. Doucet:

This letter accompanies the submittal of the documents listed below in response to Comment #86 in the October 20, 2022, Comments for the Consolidated Permit Application.

- GrassyMtn_RaptorNests.zip (shapefiles)
- EMS_Grassy_raptor_database_2020.xlsx
(Please look at the tab 'nest database description' in this file.)

The document submittal record for Comment #86 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', written over a faint, stylized graphic of a mountain range.

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: GrassyMtn_RaptorNests.zip and
EMS_Grassy_raptor_database_2020.xlsx

Comment Number: 86	Category: 2	Status: B (Not Resolved)
Comment: This comment was originally submitted as part of the November 2018 review. It does not appear to have been addressed in Version 3 of the Wildlife Resources Baseline Report, revised January 2019. Rather than addressing this comment, the authors of the Baseline Report appear to have simply removed information. The study work plan indicates that GOEA nest surveys “will be collected at two separate periods at least 30 days apart during the nesting season”. The work plan does not indicate if these surveys are to occur within the same year, but it is assumed that the intent was to have a minimum of two surveys per year during the nesting season. In Version 2 of the Baseline report, it was stated that nest surveys occurred only once in 2014 (4/27/14) and no replicate survey occurred during the same year at least 30 days from the initial survey. Four nest surveys occurred in April 2017, with no replicate 30 days apart from any of the April 2017 surveys. Some ground monitoring occurred in June 2017 (but outside of the survey window stated in the study work plan (surveys occurred June 21-23, stated window is April 15-June 15). Only one survey was conducted in 2018 (2/6/18) and this was outside of the nesting season (April 15-June 15). The Baseline Report V3 indicates that aerial nest surveys occurred 4/21/17 and 4/28/17. A ground survey of known eagle nest, OR GE 1327, occurred on 5/27/17. No eagles were observed and no follow-up survey occurred to meet the requirement of the study work plan. In 2018, this nest (OR GE 1327) was observed twice from the air, but the survey dates (1/24/18 and 2/6/18) are outside of the nesting season (April 15-June 15). Two additional eagle nests observed near Sagebrush Gulch were also observed on 1/24/18 and 2/6/18, but they were not surveyed during the nesting season. Proposed Resolution: The golden eagle nests should be surveyed in accordance with the work plan, during the nesting season, to determine if they are active.		
Initial Response (Dec 2021): The TRT approved the BDR Ver. 4 (October 2020) as complete at their 02/02/2021 meeting.		

Document Submittal: [GrassyMtn_RaptorNests.zip](#) and [EMS_Grassy_raptor_database_2020.xlsx](#)

Comment Number: 86	Category: 2	Status: B (Not Resolved)
TRT Response (Oct 2022): Maps and shapefiles for surveys and nest locations were not included with the application materials. These are necessary for assessing impacts and mitigation measures. The additional 2020 surveys were performed according to the study plan parameters. Ground surveys are not required in addition to aerial surveys, but were noted in previous comments because when ground surveys occurred in the past, they did not occur during the timeframe required by the study plan. Because GOEA occupancy may shift during the timeframe since the 2020 survey, depending on when disturbance is scheduled to commence, we recommend resurveying the wildlife study ascertain more recent nest and territory occupancy. These surveys should be conducted during courtship when the adults are mobile and conspicuous. Surveys of nests should also be conducted to assess nesting activity. The Service should be consulted to determine appropriate timeframes for both types of surveys.		
Preliminary Response to Comment (Nov 2022): Calico assumes this is resolved. It was approved by TRT on 2/2/2021 and the TRT indicated additional GOEA surveys could be completed prior to disturbance (a permit condition).		
Agency Comments (Jan 2023): This comment can easily be resolved when the GIS layers for the most recent nest surveys are provided. Without nest location data, USFWS is unable to fully evaluate potential impacts of proposed activities and the potential effectiveness of proposed mitigation. The failure to submit these data to USFWS during the prior review period represents a data gap consistent with Category 2.		
Revised Response to Comment (Jan 2023): The Grassy Mountain Mine 2020 raptor survey shapefiles and nest database description file were uploaded to DOGAMI on January 4, 2023.		