



April 27, 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 Comments 415-419 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 the above-referenced comments in the October 20, 2022, Comments for the Consolidated Permit Application.

- *Noxious Weed Monitoring and Control Plan (April 2023)*

The document submittal record for the above referenced comments is attached. Please see the "Response (Apr 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 Records

Attachment
Document Submittal Records

Comment Number: 415

Comment Number: 415		Category: 2	Status: C (Preliminary Resolved)
Topic: Noxious weeds		CPA Reference: Noxious Weed Monitoring and Control Plan	
Commentor: ODFW In general, soil disturbance while controlling noxious weeds in rangeland settings should be avoided. Tilling of whitetop is contraindicated. Tilling medusahead is also contraindicated unless extensive seeding and weed control program is in place. Tilling of field bindweed should be avoided.			
Initial Response to Comment: Appendix D17, Noxious Weed Monitoring and Control Plan, will be revised.			
Stantec – Comment Addressed as Indicated? NA	Stantec – Preliminary Assessment – Sufficient Response? NA		TRT Response:
Preliminary Response to Comment (Nov 2022):			
Agency Comment:			
Response to Comment (Apr 2023): All references to tilling have been removed. Language referencing mowing has been retained. The revised <i>Noxious Weed Monitoring and Control Plan</i> (Appendix D17 to the CPA) was uploaded to DOGAMI on April 27, 2023.			

Comment Number: 416

Comment Number: 416		Category: 2	Status: C (Preliminary Resolved)
Topic: Noxious weeds		CPA Reference: Noxious Weed Monitoring and Control Plan, Section 4.2 Pg 8	
Commentor: ODFW This section provides good detail on specific measures for protective management or locations that may introduce or act as vectors for noxious weeds. Provide discussion on mechanisms that will in place to ensure these measures are implemented when necessary and the order of operations for selecting and implementing multiple measures.			
Initial Response to Comment: Appendix D17, Noxious Weed Monitoring and Control Plan, will be revised.			
Stantec – Comment Addressed as Indicated? NA	Stantec – Preliminary Assessment – Sufficient Response? NA		TRT Response:
Preliminary Response to Comment (Nov 2022):			
Agency Comment:			
Response to Comment (Apr 2023): New paragraph inserted in Section 6 to address this. "Based on the monitoring of existing and identification of new noxious week infestations, a treatment plan will be developed. This plan will outline the treatment methods to be used, the order of operations, and the timing of treatment. Prior to treating noxious weeds, Calico will coordinate with BLM Malheur County Field Office (MFO) botany staff to determine a specific and appropriate treatment plan to maximize the potential to appropriately address infestations while protecting wildlife areas and sensitive plant species." The revised <i>Noxious Weed Monitoring and Control Plan</i> (Appendix D17 to the CPA) was uploaded to DOGAMI on April 27, 2023.			

Comment Number: 417

Comment Number: 417		Category: 2	Status: C (Preliminary Resolved)
Topic: Noxious weeds		CPA Reference: Noxious Weed Monitoring and Control Plan, Pg 9	
Commentor: ODFW Noxious weed control plan/mitigation plan should include roadside spraying regularly to control annual grasses beyond the road prism in recognition of road improvement related soil disturbance and increased vehicle use as vectors for annuals grasses. Pg. 9 Noxious weed control should occur after blading and maintenance (as well as before).			
Initial Response to Comment: Appendix D17, Noxious Weed Monitoring and Control Plan, will be revised.			
Stantec – Comment Addressed as Indicated? NA		Stantec – Preliminary Assessment – Sufficient Response? NA	TRT Response:
Preliminary Response to Comment (Nov 2022):			
Agency Comment:			
Response to Comment (Apr 2023): Discussion of road maintenance in Section 4.2 has been edited to include roadside spraying. The road discussion has also been edited to reflect that treatment of noxious weeds will occur after as well as before blading and road maintenance. The revised <i>Noxious Weed Monitoring and Control Plan</i> (Appendix D17 to the CPA) was uploaded to DOGAMI on April 27, 2023.			

Comment Number: 418

Comment Number: 418		Category: 2	Status: C (Preliminary Resolved)
Topic: Noxious weeds	CPA Reference: Noxious Weed Monitoring and Control Plan, Section 4.3, Pg 10		
Commentor: ODFW Several treatment types are presented in this section. It is important to know how and when specific treatment types will be selected to successfully treat noxious weeds. Provide a diagram or discussion that outlines the selection criteria for specific treatment types and when each will be used.			
Initial Response to Comment: Appendix D17, Noxious Weed Monitoring and Control Plan, will be revised.			
Stantec – Comment Addressed as Indicated? NA	Stantec – Preliminary Assessment – Sufficient Response? NA		TRT Response:
Preliminary Response to Comment (Nov 2022):			
Agency Comment:			
Response to Comment (Feb 2023):			
Response to Comment (Apr 2023): A flow chart (Diagram 1) has been added to the <i>Noxious Weed Monitoring and Control Plan</i> to outline the selection criteria for specific treatment types and when each should be used. The revised <i>Noxious Weed Monitoring and Control Plan</i> (Appendix D17 to the CPA) was uploaded to DOGAMI on April 27, 2023.			

Comment Number: 419

Comment Number: 419		Category: 2	Status: C (Preliminary Resolved)
Topic: Noxious weeds		CPA Reference: Noxious Weed Monitoring and Control Plan, Section 6, Pg 17	
Commentor: ODFW Monitoring is an integral component of a noxious weed control program. It is not only used to identify new noxious weed infestations but also evaluate post treatment success. Treatment success criteria are equally important for determining if follow up is treatment is necessary and at what intensity. Provide success criteria that will be used to determine treatment success. The success criteria can be based off the individual species identified in section 5 or off general habitat types identified in the application.			
Initial Response to Comment: Appendix D17, Noxious Weed Monitoring and Control Plan, will be revised.			
Stantec – Comment Addressed as Indicated? NA	Stantec – Preliminary Assessment – Sufficient Response? NA		TRT Response:
Preliminary Response to Comment (Nov 2022):			
Agency Comment:			
Response to Comment (Apr 2023): Same response as Comment 422, as follows: The plan has been updated to include additional information, as follows, in Section 6: "Success criteria have been developed as part of the Reclamation Plan (Appendix C, Post-Closure Vegetation Success Criteria). These criteria will also be used to evaluate success during operations. Based on monitoring results, treatment methods may be varied during the project or during decommissioning and post-project reclamation phases." The revised <i>Noxious Weed Monitoring and Control Plan</i> (Appendix D17 to the CPA) was uploaded to DOGAMI on April 27, 2023.			