



Oregon

Kate Brown, Governor

Department of Geology & Mineral Industries
Mineral Land Regulation and Reclamation
229 Broadalbin Street SW
Albany, OR 97321-2246
(541) 967-2039
Fax: (541) 967-2075
www.oregongeology.com

August 22, 2017

Calico Resources USA Corp.
Nancy Wolverson
665 Anderson Street
Winnemucca, Nevada 89445

Re: Environmental Baseline Study Work Plans – May 17, 2017
(Sent via email to nancy@paramountnevada.com and US Mail - return receipt requested)

Dear Ms. Wolverson:

Calico submitted Environmental Baseline Study Work Plans – May 17, 2017 for review by the Calico Technical Review Team (TRT). These Environmental Baseline Study Work Plans are associated with the Notice of Intent – February 28, 2017.

The Calico TRT has reviewed the baseline study work plans and met on July 26, 2017 to discuss the draft baseline work plans. The consolidated comments of the TRT are as follows.

General Comments

The Notice of Intent – February 28, 2017 included the mine and processing area, along with the associated access road. For each study discipline, the baseline study work plans should be clear on the application of the study methodologies to both the mine and processing area and the access road area.

For the maps and figures, the Notice of Intent – February 28, 2017 entire project area should be included on each map or figure.

The attached organization charts provide updated information on the membership of the Project Coordinating Committee (PCC) and TRT, including changes in Water Resources Department (WRD) staff. The accompanying PCC and TRT master lists include updated contact information and TRT subcommittee membership details.

Discipline-Specific Comments

- Geology and Soils

The baseline geology of the access road should be included and the study area included in Figure 5 should be modified to reflect the entire Notice of Intent – February 28, 2017 project area. The geologic hazards and faults of the road area should be included as a baseline data collection methodology.

- Geochemistry

The geochemistry study work plan is underway. There are no additional comments on this section.

- Surface Water

Under "Purposes and Objectives" on page 31, the text discusses characterizing water resources for "... the adjacent Bishop property where the mineral processing facility would be located". Please update with the revised information regarding the location of the processing facility.

In order to accommodate the necessary extended holding times for the analytical laboratory used by Calico, a combined analysis for nitrite (NO₃)-nitrate (NO₂) that is preserved with H₂SO₄ should be used to extend the hold time to 28 days. An alternative EPA method for analysis of the combined concentration of nitrite and nitrate with a 28-day hold time should be specified.

- Groundwater

Under "Purposes and Objectives" on page 49, the text discusses characterizing water resources for "... the adjacent Bishop property where the mineral processing facility would be located". Please update with the revised information regarding the location of the processing facility

In order to accommodate the necessary extended holding times for the analytical laboratory used by Calico, a combined analysis for nitrite (NO₃)-nitrate (NO₂) that is preserved with H₂SO₄ should be used to extend the hold time to 28 days. An alternative EPA method for analysis of the combined concentration of nitrite and nitrate with a 28-day hold time should be specified.

- Terrestrial Vegetation

The baseline terrestrial vegetation studies should be adequate to develop a fish and wildlife protection and mitigation plan developed to the standards adopted by the Oregon Department of Fish and Wildlife (ODFW) [see OAR 632-037-0060(12)].

The protocols referenced in the first bullet of 3.5.5.3 on page 80 are missing.

- Wetlands

The Notice of Intent – February 28, 2017 included the additional areas for the access road. Calico should apply to the Department of State Lands (DSL) for a jurisdictional wetland review for the revised study area. Additional information on applying for a jurisdiction wetland review is available at <http://www.oregon.gov/dsl/WW/Pages/WWforms.aspx>.

- Wildlife Resources

In section 3.7.4.2 on page 98, the third paragraph is redundant in addressing annual grasses three times.

Table 18 on page 99 should be updated; Greater Sage-grouse is no longer a candidate species.

Calico's consultant, EM Strategies, has expressed interest in conducting lek searches and winter concentration surveys via helicopter. According to ODFW, this is an acceptable method and should be added to the baseline work plan. Additional information on the baseline protocol is in the Greater Sage-grouse Conservation Assessment and Strategy for Oregon 2011, available at http://www.dfw.state.or.us/wildlife/sagegrouse/docs/20110422_GRSF_April_Final%2052511.pdf.

In the 'Nesting Raptors' discussion on page 103, the second paragraph states survey protocols are summarized below; but they are not. The previous paragraph has the reference for the protocols which should be sufficient, or they can be summarized; but the broken reference needs to be corrected.

Calico's consultant, EM Strategies, proposed using a call-broadcast survey (Conway and Simon 2003) for burrowing owls. This is an acceptable baseline data collection methodology and should be added to the baseline plan.

The baseline pygmy rabbit survey does not need to be conducted twice. Pygmy rabbit surveys are based on burrows and sign, and do not need to be conducted more than once.

- *Aquatic Resources*
The aquatic resources baseline should be reviewed and modified as appropriate, with the conclusions of a jurisdictional wetland review by DSL (see previous *Wetlands* comments).
- *Grazing Management*
No comments.
- *Visual Resources*
Baseline data for visual resources is a Federal requirement. There is no State requirement for baseline data for visual resources.
- *Air Quality*
No comments.
- *Noise*
There are State standards for noise (see OAR Chapter 340, Division 35). DOGAMI will use a qualified contractor to review the proposed noise baseline study, including the access road.
- *Cultural Resources*
Continued coordination with the Bureau of Land Management is appropriate.
- *Land Use*
No comments.
- *Transportation*
No comments.
- *Socio-economics*
No revisions necessary.
- *Environmental Justice*
No comments.
- *Recreation*
There are no State standards for recreation.

- Mined Land Reclamation
The Reclamation and Closure Plan (see OAR 632-037-0070) should be submitted with the Consolidated Application. The TRT will review the Reclamation and Closure Plan as part of the process to review the Consolidated Application, when received.
- Wild, Scenic or Recreational Rivers
- Areas of Critical Environmental Concern/Research Natural Areas
- Outstanding Natural Areas
- Oregon Natural Heritage Plan Areas
The baseline document should be revised to reflect a review for the Oregon Natural Heritage Plan, not National Heritage Plan.

State agency partners participating in the TRT are available to answer questions or provide additional information. Please consult Bob Houston at Robert.houston@oregon.gov or 541-225-6451 for guidance on the appropriate, specific TRT members to contact, if needed.

Sincerely,



Ian Madin
Chief Scientist/Deputy Director
Oregon Department of Geology and Mineral Industries

Attachments:

1. *Oregon Chemical Process Mine Consolidated Permitting Organizational Chart*
2. *Calico Project Coordinating Committee Master List*
3. *Calico Technical Review Team Master List (including subcommittees)*

cc: Calico Technical Review Team
Richard DeLong, EM Strategies