United States Forest Service  County of San Bernardino

BUTTERFIELD SENTINEL QUARRY EXPANSION PROJECT

FINAL

ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

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Prepared for:
United States Forest Service
County of San Bernardino, California

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1.0 INTRODUCTION

Omya, Inc. (Omya or Applicant) has submitted the following applications to the United States Department of Agriculture, Forest Service, San Bernardino National Forest (SBNF or Forest Service) and the County of San Bernardino (County) in order to expand Omya’s existing Butterfield and Sentinel (Butterfield-Sentinel) Limestone Quarries and related processing facilities. In accordance with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), the County and Forest Service prepared a joint Draft Environmental Impact Report and Environmental Impact Statement (Draft EIR/EIS) and this Final Environmental Impact Report and Environmental Impact Statement (Final EIR/EIS) in response to Omya’s submittal of the following applications:

- An Amended Plan of Operations (POO) and Reclamation Plan to the Forest Service; and
- A Mining and Land Reclamation Plan Conditional Use Permit (CUP) application to the County.

This Final EIR/EIS provides a brief description of the proposed Project (Project), the CEQA and NEPA review processes and how the Final EIR/EIS will be used by Forest Service and County decision makers (Section 1.0), the response to comments received on the Draft EIR/EIS (Section 2.0), revisions and corrections to the Draft EIR/EIS (Section 3.0), and the Mitigation Monitoring and Reporting Plan (MMRP) (Section 4.0). Addendums and memorandums that provide additional clarification are found in the appendices to this Final EIR/EIS. The Final EIR/EIS is to be used in conjunction with, rather than in place of, the Draft EIR/EIS.

1.1 Project Overview

1.1.1 Summary of Project

The Project is the expansion of the Butterfield and Sentinel (Butterfield-Sentinel) Limestone Quarries. The quarries are located approximately 7.5 miles south of the community of Lucerne Valley and 5 miles north of Big Bear Lake within the SBNF in San Bernardino County, California (see Figure 1-1). The existing Butterfield and Sentinel limestone quarries as well as the Project expansions are and would continue to be entirely within portions of approximately 954 acres of unpatented placer claims controlled by Omya but located on public land administered by the SBNF.

Known limestone ore resources within the proposed quarry expansion areas would add an additional 40 years life to the Butterfield quarry and an additional 20 years life to the Sentinel quarry. The Project would allow continued mining of these reserves to be extended until approximately 2055. Disturbance proposed for the Project includes expansion of existing Butterfield and Sentinel quarries, expansion of associated overburden placement sites, additional internal access roads and ancillary facility areas, and minor adjustments to existing disturbance boundaries. The Project does not include any new quarries, new haul roads or new overburden sites.

The proposed expansion would include 30.6 acres of disturbance at the Butterfield Quarry, and 64.3 acres of disturbance at the Sentinel Quarry area. The 64.3 acres of disturbance at the Sentinel Quarry includes 16 acres at the Sentinel Quarry, 27.8 acres at the Overburden Pad 5, 19.5 acres in the Central Area and 1 acre for a maintenance buffer at the Sentinel North Pad. The total area of disturbance associated with
the Project would be 94.9 acres. Quarry development and expansion would be phased and reclamation would occur concurrently.

Depending on market demand, the maximum combined Butterfield and Sentinel quarries average ore production rates would be approximately 680,000 tons per year compared to the 3-year average from 2004 – 2006 of approximately 378,000 tons per year.

The existing operational hours currently in place at the quarries would not change with this Project. Mining activities would vary through the year, and could occur 24 hours/day, 7 days/week depending on operational requirements. Blasting would be restricted to daylight hours. Winter, snowfall and ore production requirements are and would be the major determining factors for scheduling of ore and waste rock mining. Other factors such as market conditions and maintenance requirements would also affect this schedule.

The quarries would be multi-bench open pit mines. Several working levels would be operated at any one time to supply the quota of ore needed to meet production demands. The multi-working level concept allows for greater selectivity and blending of rock qualities to meet stringent quality standards of customers, and allows maximum utilization of the resource. Five grades of ore would be selectively mined. The ore would be drilled and blasted, loaded into haul trucks and hauled to the crusher currently located just southwest of the Sentinel Quarry. Crushed ore would be loaded into off-road haul trucks and transported eight miles on the vested Crystal Creek Haul Road to the existing processing plant in Lucerne Valley.

Waste rock, defined as limestone and other rock not suitable for the manufacture of Omya-produced limestone products, would be stockpiled within the planned overburden stockpiles and/or backfilled within the quarries’ footprints to reduce the size of separate stockpiles, thereby reducing surface disturbance and potential impacts to wildlife habitat, sensitive vegetation, and visual resources.

There would be no operational settling ponds on-site or new runoff diversion channels required. No change in the number of blasts would be expected which is approximately one per week at each quarry. Table 1-1 provides a summary of the Project. Figure 1-2 shows the existing mine plan and proposed expansion areas.

The Proposed Action (Project) also includes a Project-specific forest plan amendment to reduce the Scenic Integrity Objectives in the Project Area. The current Land Management Plan (LMP) Scenic Integrity Objectives (SIOs) map, provided as Figure 3.1.2 – Existing SIOs in Section 3.1 of the Draft EIR/EIS, identifies the regional setting in which the Project is located as High. However, as discussed in Section 3.1 of the Draft EIR/EIS, the existing and historic landscape character of the region appears to be inconsistent with a SIO ranking of High. According to Anita Bueno of the SBNF, the existing Project Area currently has baseline conditions that are more consistent with scenic integrity levels ranging from Low to High, and a plan amendment should be made by the Forest Service to address this inconsistency. The amendment would be subject to pre-decisional administrative review under 36 CFR § 218, not the review process for
forest plans under 36 CFR § 219. When a plan amendment is made together with, and only applies to, a project or activity decision, the analysis prepared for the project or activity may serve as the documentation for the preliminary identification of the need to change the plan (§219.13(b)(1)). This documentation is found within Section 3.1 – Aesthetics of the Draft EIR/EIS.

### Table 1-1 Existing and Proposed Quarries’ Production and Operational Areas

<table>
<thead>
<tr>
<th>Quarry/Area</th>
<th>Project Proposed Area (acres)</th>
<th>Total Existing and Proposed Area (acres)</th>
<th>Ore Limestone Resources (millions of tons)</th>
<th>Annual Average Excavated (tons)</th>
<th>Annual Average Production – “ore to plant” (tons)</th>
<th>Annual Average Waste – including crusher fines¹ (tons)</th>
<th>Max. Depth (feet above ground surface)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Butterfield</td>
<td>30.6</td>
<td>52.3</td>
<td>7.6</td>
<td>356,500</td>
<td>162,500</td>
<td>194,000</td>
<td>200</td>
</tr>
<tr>
<td>Sentinel</td>
<td>16.0</td>
<td>75.6</td>
<td>24.4</td>
<td>1,131,000</td>
<td>517,500</td>
<td>613,500</td>
<td>600</td>
</tr>
<tr>
<td>B5 OB Pad</td>
<td>27.8</td>
<td>51.2</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Central Area</td>
<td>19.5</td>
<td>47.8</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>North Pad*</td>
<td>1.0</td>
<td>5.5</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Totals</td>
<td>94.9</td>
<td>232.4</td>
<td>32</td>
<td>1,487,500</td>
<td>680,000</td>
<td>807,500</td>
<td>---</td>
</tr>
</tbody>
</table>

Notes:  
*Sentinel North Pad – Maintenance Buffer.  
Volumes are estimated based on drilling data and computer modeling.  
Area rounded to nearest tenth of an acre. Totals may be slightly different due to rounding.  
In-situ or in-place limestone rock weight to volume ratio estimated at 2 tons per cubic yard.  
Waste rock (interburden and overburden) excavated will vary annually depending on area being excavated.  
¹ – Fines produced from primary onsite crushing estimated at 15% of ore crushed.

A detailed description of the Project is provided in Section 2.0 – Project Description of the Draft EIR/EIS. The Project purpose and need, objectives and alternatives to the Project are discussed in Section 1.0 – Introduction of the Draft EIR/EIS.
1.0 INTRODUCTION

Butterfield-Sentinel Final EIR/EIS

December 2019

OM01_Final EIR‐EIS_December 2019.docx

Project Site Location (Geographic Location)
California Zone 5 (FIPS 405), 6881064.78 1943854.58
Lat/Lon: 34° 19' 45.0165" N, 116° 56' 31.3945" N

Source: SLR Consulting USA Pty Ltd, 5/2013
Figure 1-2  Existing Quarries and Proposed Operations
1.1.2 Project Environmental Impacts and Mitigation Measures

The Project was evaluated to identify potentially significant impacts that would result from the proposed activities. The evaluations included, but were not limited to, the review of comments received during the public scoping process, technical reports and studies addressing environmental concerns, the Project design features, operating practices and Best Management Practices (BMPs) that would be implemented as part of the Project to minimize potential environment impacts, as well as regulatory requirements that would be imposed on the Project.

The environmental issues identified below were determined not to be significantly affected by the implementation of the Project and did not require further analysis in the Draft EIR/EIS. However, due to some public interest in several areas that were eliminated during scoping, brief discussions were included in Section 3.0 of the Draft EIR/EIS (Agriculture and Forestry, Cultural Resources, Hazards and Hazardous Materials, and Noise). The Draft EIR/EIS section number where each of the environmental issues are evaluated is identified in parentheses.

- Agriculture and Forestry (3.2)
- Cultural Resources (3.5)
- Hazards and Hazardous Materials (3.7)
- Land Use and Planning
- Mineral Resources
- Noise (3.9)
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

The following environmental issues are described and evaluated in detail within Section 3.0 of the Draft EIR/EIS. If determined necessary and feasible, mitigation measures were identified to reduce the impact(s) to less than significant. The Draft EIR/EIS section number where each of the environmental issues are evaluated is identified in parentheses.

- Aesthetics (3.1)
- Air Quality and Greenhouse Gases (3.3)
- Biological Resources (3.4)
- Geology and Soils (3.6)
- Hydrology and Water Quality (3.8)

The Draft EIR/EIS identified that there were no potential impacts that could not be mitigated to less than significant.

1.2 CEQA & NEPA Environmental and Public Review Process

1.2.1 Final EIR/EIS Requirements

Section 15132 of the CEQA Guidelines and Section 1503 of the NEPA Guidelines requires that the Final EIR/EIS consist of:

- The Draft EIR/EIS or a revision of the draft;
- Comments and recommendations received on the Draft EIR/EIS either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR/EIS;
• Modifications to existing alternatives, or development and evaluation of alternatives not previously given serious consideration by the Lead Agencies;
• Supplementation, improvements, or modifications to the previous analyses;
• Factual corrections;
• The responses of the Lead Agencies to substantial and relevant environmental points raised in the review and consultation process;
• Supplementation, improvements, or modifications to the previous analyses; and
• Any other information added by the Lead Agencies.

The information in this Final EIR/EIS, which incorporates the Draft EIR/EIS, fulfills both the State and County CEQA requirements as well as Federal NEPA requirements for a complete EIR/EIS.

CEQA Guidelines Section 15088 and NEPA Guidelines Section 1503.4 provides that where the response to comments makes important changes in the information contained in the text of the Draft EIR/EIS, the Lead Agencies should either revise the text in the body of the EIR/EIS or include marginal notes showing that the information is revised in the response to comments. Section 3.0 of this Final EIR/EIS provides revisions for clarification or amplification of information already in the record, as well as corrections noted during preparation of this Final EIR/EIS and by commenters. In no instances do the revisions or corrections provide substantial new information, indicate a new impact, or increase in the severity of an impact identified in the Draft EIR/EIS.

1.2.2 Use of the EIR/EIS in the Decision-Making Process

The EIR/EIS is an informational document designed to inform the public and decision makers of the significant environmental effects of a project, identify possible ways to minimize or avoid the significant effects, and describe reasonable alternatives to the project. Additionally, both CEQA and NEPA have similar goals of ensuring that governmental actors implementing regulations are designed to allow flexibility in consolidating and avoiding duplication among multiple governmental layers of review.

The Forest Service and County decision makers will use the EIR/EIS together with economic, social, and technical information, to decide whether to approve the discretionary entitlements being requested.

Upon review of the Final EIR/EIS and before rendering decisions on the discretionary actions, the Forest Service and County must certify that:

• The Final EIR/EIS was completed in compliance with both NEPA and CEQA;
• The Final EIR/EIS was presented to the decision-making body of the Lead Agencies, and the decision-making body reviewed and considered the information contained in the Final EIR/EIS prior to approving the project; and
• The Final EIR/EIS reflects the Forest Services’ and County’s independent judgments and analyses.
Should the Project be approved by the Forest Service and County, pursuant to CEQA a statement of findings would be adopted for each significant environmental effect of the Project, accompanied by a brief explanation of the rationale for each finding. Possible findings are one or a combination of the following findings:

- Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Final EIR/EIS;
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; and/or
- Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR/EIS.

Concurrent with preparation of the CEQA Statement of Findings, pursuant to NEPA the Forest Service will file the Final EIR/EIS with the Environmental Protection Agency (EPA), the EPA publishes a Notice of Availability (NOA) in the Federal Register which identifies for how long (30 to 45 days) the Final EIR/EIS will be made available to the public. Once the NOA is published, the Federal lead agency is required to wait a minimum 30-day period before the Federal lead agency makes a decision on a proposed action. In addition, a notice will be filed in the newspaper of record (San Bernardino Sun) noticing the opportunity to object (a 45-day period which anyone with standing can file an objection to the agencies determination). Once the Final EIR/EIS and NOA are published, and after the minimum 30- to 45-day review and objection periods, the lead agencies may issue a Record of Decision (ROD) informing the public of the final decision and identifying all alternatives considered in reaching the decision. The ROD must set forth the SBNF’s decision on the Project, describing the alternatives considered, and stating whether mitigation measures have been adopted.

The Project will be regulated by both Forest Service and County in accordance with applicable regulations. Specifically, applicable Federal and SBNF regulations include, but are not limited to, the General Mining Law of 1872 (Mining Act), Forest Service Regulations for Mining (36 CFR 228), SBNF Land Management Plan (LMP) and associated Monitoring Guide, Raptor Conservation Strategy (San Bernardino National Forest, July 2019), North Slope Bighorn Sheep Conservation Strategy (California Department of Fish and Wildlife, October 2019), as well as the San Bernardino Carbonate Management Strategy (CHMS) (SBNF 2003).

Additionally, the Project would be regulated, as appropriate, by local, state, and federal regulatory agencies such as, but not limited to, the US EPA, US Fish and Wildlife Services (USFWS), US Army Corp of Engineers, the California Department of Conservation (DOC), the California Department of Mine Reclamation (DMR), the Colorado River Basin Regional Water Quality Control Board (CRBRWQCB) and Lahontan Regional Water Quality Control Board (LRWQCB), the California Department of Fish and Wildlife (CDFW), the State Historic Preservation Office (SHPO), County Fire Department acting as the Certified
Unified Program Agency (CUPA). Please see Section 1.0 within the Draft EIR/EIS for a detailed description of local, state, and federal regulatory agencies and requirements applicable to the Project.

1.2.3 Project Public Review

In accordance with both the specific requirements and the intent of CEQA and NEPA, the environmental review process for the Project has included substantial opportunities for public and agency review and comment on the environmental documents. The public review process for the Project EIR/EIS included the following opportunities:

- A Notice of Intent (NOI) was prepared for the Project by the Forest Service and published in the Federal Register on February 28, 2013. Additionally, the County prepared the Notice of Preparation (NOP) and Initial Study for the Project and circulated to all responsible agencies and interested parties, including the California State Clearinghouse, beginning on February 22, 2013. A joint NOP/NOI was mailed to the agencies, organizations, and individuals on both the Forest Service and County mailing lists.

- In order to ensure that the public agencies, organizations, and individuals had access to the Initial Study as well as the technical documents supporting the Initial Study, the scoping period was extended two times, once to April 16 and then again to June 6, 2013.

- The joint NOP/NOI was also published in the local newspapers and copies of the Initial Study and the Amended POO and Reclamation Plan were posted on the agency websites.

- Two public scoping meetings were held to provide the public and government agencies the opportunity to receive information on the CEQA/NEPA process and the Project as well as provide verbal and written comments. Approximately six people attended the meeting in Big Bear and seven people attended the meeting in Lucerne Valley. Thirteen letters/emails were received—, eight from governmental agencies and five from organizations/individuals.

- The Forest Service published the Draft EIR/EIS Notice of Availability (NOA) in the Federal Register and the County distributed the Draft EIR/EIS Notice of Completion (NOC) to the California State Clearinghouse. The NOA was filed in the Federal Register on July 13, 2018. The NOC was filed with the State of California Clearinghouse on July 13, 2018. A Legal Notice/NOA was also posted in the San Bernardino Sun Newspaper on July 13, 2018. A joint NOA/NOC was posted on both the County’s and Forest Service’s Internet websites, along with links to download the Draft EIR-EIS.

- In addition, notices were sent to the agencies, organizations and individuals on the County and Forest Service mailing lists and posted in the San Bernardino County Sun.

- The Draft EIR/EIS was circulated for review and comment between July 13, 2018 and August 28, 2018.

- The Draft EIR/EIS was made available for public review at both the San Bernardino and Fawnskin SBNF field offices, as well as the County Planning Division offices in San Bernardino and Hesperia. The Draft EIR/EIS was also available on both the Forest Service’s and County’s internet websites.
Copies (CDs) of the Draft EIR/EIS were provided, upon request, to responsible, trustee, and other federal, state, and local agencies expected or known to have expertise or interest in the resources that the Project may affect, as well as to organizations and individuals.

This Final EIR/EIS has been provided to commenting agencies, organizations, and individuals in either hard copy, electronic format on CD, and/or on the County and Forest Service web pages. The County will hold a public hearing before the County Planning Commission on December 19, 2019. Notice of the availability of this Final EIR/EIS has also been provided to agencies, organizations, and members of the public who had previously expressed an interest in the Project but did not comment on the EIR/EIS.

### 1.2.4 Document Availability

Copies of the Final EIR/EIS has been made available for public review at the following locations:

**San Bernardino National Forest**
- Forest Headquarters
- 602 S. Tippecanoe Avenue
- San Bernardino, CA 92408

**San Bernardino National Forest**
- Big Bear Discovery Center
- 40971 North Shore Drive, Highway 38
- Fawnskin, CA 92333

**San Bernardino County**
- Land Use Services Department
- Planning Division
- 385 North Arrowhead Avenue
- San Bernardino, CA 92415-0182

**San Bernardino County**
- Land Use Services Department
- Planning Division
- 15900 Smoke Tree Street
- Hesperia, CA 92345

Further details on the proposed Butterfield Sentinel Quarry Expansion Project, including the Draft and Final EIR/EIS as well as the supporting appendices, have been posted at:

- [https://www.fs.usda.gov/project/?project=32613](https://www.fs.usda.gov/project/?project=32613), or

Copies of the Final EIR/EIS have also been made available by contacting:

**Reuben Arceo**
- County of San Bernardino
- Land Use Services Department
- 385 N. Arrowhead Avenue
- San Bernardino, CA 92415-0187
- Email: reuben.arceo@lus.sbcounty.gov

**Tasha Hernandez**
- United States Forest Service
- San Bernardino National Forest
- 602 S. Tippecanoe Avenue
- San Bernardino, CA 92408
- Emails: thernandez@fs.fed.us
2.0 COMMENTS AND RESPONSES TO THE DRAFT EIR/EIS

Responses to each substantive comment regarding the Draft EIR/EIS’s evaluation of environmental impacts of the Project and/or the adequacy of the Draft EIR/EIS are provided in the following sections. The Forest Service and County received three (3) letters from public agencies, two (2) letters from organizations, and 1,155 electronically generated emails from “everyactioncustom.com” during the 45-day comment period. Table 2-2 in Section 2.2 provides a list of the commenters. All comments were carefully reviewed and common concerns that were expressed by several authors were identified. Section 15006 of the CEQA Guidelines and Section 1503.4 of the NEPA Guidelines encourage that environmental documents be organized and written in an efficient and streamlined manner; therefore, “Collective Responses” (CR) were developed to address these general concerns. Consistent with this policy, instead of individually repeating specific comments from each letter, the actual letters are included in Section 2.2 of this Final EIR/EIS, with the substantive comments bracketed and numbered, so that they may be referenced to the appropriate response. The 1,155 e-blast commenters sent by “everyactioncustom.com” on behalf of individual members of the Center for Biological Diversity (CBD) (communication between SBNF and CBD, 8/24/18) are listed in Appendix A, but copies of the 1,155 emails are not included in the Final EIR/EIS. The emails were essentially identical and the substantive concerns are addressed in the CRs. (Copies of the emails are available upon request to the Forest Service)

Comments that were introductory in nature, expressed general opposition to the Project, or raised concerns that were not related to the evaluation of environmental effects of the Project or the adequacy of the Draft EIR/EIS were not bracketed for specific responses. All comments have been noted and are included as part of the Administrative Record, and will be considered by both the Forest Service and County decision makers during deliberations on Project approvals.

2.1 Collective Responses

Table 2-1 identifies the common concerns for which Collective Responses have been developed.

<table>
<thead>
<tr>
<th>CR#</th>
<th>Topic</th>
<th>Sub-Topic</th>
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</thead>
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<tr>
<td>CR1</td>
<td>Biological Resources</td>
<td>Carbonate Habitat Management Strategy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(EPA Letter, CBD Letter, CBD e-blast)</td>
</tr>
<tr>
<td>CR2</td>
<td>Biological Resources</td>
<td>Raptor Conservation Strategy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(EPA Letter, CBD Letter, CBD e-blast)</td>
</tr>
<tr>
<td>CR3</td>
<td>Biological Resources</td>
<td>North Slope Bighorn Sheep Conservation Strategy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(EPA Letter, CBD Letter, CBD e-blast)</td>
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</table>
2.1.1 CR 1: Biological Resources – Carbonate Habitat Management Strategy (CHMS)

Several commenters noted that the mitigation for impacts to the federally-listed carbonate endemic plant species (administrative mineral withdrawal) could be considered temporary in nature. An administrative mineral withdrawal may be limited in duration to 20 years and, in such a case, if the Secretary of the Interior, through the Bureau of Land Management (BLM), failed to renew or extend the mineral withdrawal after 20 years, there could be a net loss in carbonate habitat.

Commenters also questioned whether the contributions were entirely within the Priority Habitat Reserve and the Furnace Unit. The CHMS has been modified so that the contributions will be entirely within these areas.

Under BLM and Forest Service policy and practice, withdrawals such as the withdrawal for this Project are routinely renewed and extended as long as the circumstances for which the withdrawals were initially approved have not changed at the time the withdrawal periods expire.

The BLM, with authority delegated by the Secretary for the Department of the Interior, is charged with administrative responsibility for the withdrawal of lands owned or controlled by the United States for public purposes and for the modification, extension or revocation of withdrawals (U.S. Department of the Interior Department Manual 603 DM 1). The BLM is further responsible for the systematic periodic review of withdrawals to ensure that the withdrawals continue to serve their original purpose. In doing so, the BLM coordinates with applicants and other federal agencies, such as the Forest Service. The Forest Service policy with regard to withdrawals is included in Chapter 2760 of the Forest Service Manual. The Manual states that Forest officers should consider withdrawals for areas of “…[c]ritical habitat of endangered species having a very limited range and specific habitat requirements not found elsewhere, and botanical areas.” (FS Manual 2761.03) With regard to mineral withdrawals that have a fixed duration, BLM offices are required to review withdrawals nearing expiration to ensure that the withdrawn lands are the minimum acreage necessary to meet the demonstrated needs of the applicant. If, after consultation with the applicant, the mineral withdrawal continues to fulfill the purpose and need of the withdrawal, the BLM will work with the applicant to renew and extend the mineral withdrawal.

The stated need for the current withdrawal is the protection of federally-listed carbonate endemic plant species and habitat. The proposed withdrawal further implements components of the CHMS, which has been incorporated as a component of the San Bernardino National Forest Land and Resource Management Plan. Ultimately, the purpose of the mineral withdrawal is to permanently protect habitat for these very narrowly distributed species. Each of the species only occurs in the vicinity of the northeastern San Bernardino Mountains and each occurs almost exclusively on carbonate soils. Because the distribution of each species is naturally constrained by the location of suitable soils, the geographic dispersion of such species will not increase over time and it is unlikely that the species will ever be delisted. Therefore, the stated purpose and need of the withdrawal — to protect carbonate plant occurrences and habitat — will continue to exist well into the future, justifying future renewals and extensions of the withdrawal for the life of the Project. As the circumstances for which the withdrawal was initially
approved likely will not have changed at the time any initial withdrawal period expires, there is no reason to assume that the withdrawal would not be renewed for the duration of the Project’s operations and in perpetuity. Therefore, the mitigation is considered permanent.

2.1.2 CR 2: Raptor Conservation Strategy

Several commenters noted the need for the public to have an opportunity to review the final Raptor Conservation Strategy (RCS). The RCS was finalized in July 2019 (San Bernardino National Forest, July 2019) and a copy is provided in Appendix C.

2.1.3 CR 3: North Slope Bighorn Sheep Conservation Strategy

Several commenters noted the need for the public to have an opportunity to review the North Slope Bighorn Sheep Conservation Strategy. A copy of the final North Slope Bighorn Sheep Conservation Strategy (California Department of Fish and Wildlife, October 2019) is provided in Appendix D.

2.2 Comment Letters

This section of the Final EIR/EIS provides specific responses to each of the comment letters received during the public review of the Draft EIR/EIS. Each letter is organized into a Comment Set, which includes the original letter or e-mail, combined with the Forest Service’s and County’s responses. The letters are grouped chronologically by agencies, organizations, and individuals. Table 2-2 lists all the commenters, their affiliation, date the comment was received, and the Comment Set number assigned to each letter. The page number at which each Comment Set begins is provided in the Table of Contents of this Final EIR/EIS.

Each Comment Set has been assigned a number, and each individual comment addressing a substantive environmental issue within the letter is bracketed and assigned a sub-number (e.g., Comment Set 1 contains bracketed comments numbered 1-1, 1-2, etc.). The Forest Service’s and County’s responses to each bracketed comment is provided directly after the individual letters.

In general, comments concerning an environmental issue pertaining to analysis in the Draft EIR/EIS receive a response that either 1) summarizes the information provided in the Draft EIR/EIS and/or directs the commenter to the section(s) of the Draft EIR/EIS providing that information, 2) provides additional information concerning the environmental issue raised by the commenter, and/or 3) provides a reference to a Collective Response in Section 2.2 of this Final EIR/EIS. If the commenter raised concerns that did not address an environmental issue or otherwise address the adequacy of the Draft EIR/EIS, a specific bracketed response was not provided; however, these comments have been noted and will be considered by Forest Service and County decision-makers during their Project approval deliberations.
2.2.1 Summary of Written Comments

As shown on Table 2-2, comments were received from 3 public agencies, 2 organizations, and an email blast (e-blast) consisting of 1,155 emails from “everyactionbcustom.com” on behalf individual members of the CBD.

Table 2-2 Public Comments Received on the Draft EIR/EIS

<table>
<thead>
<tr>
<th>Comment Set No.</th>
<th>Commenter</th>
<th>Commenter Type</th>
<th>Date Received</th>
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</thead>
<tbody>
<tr>
<td>Public Agencies</td>
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<tr>
<td>1</td>
<td>California Department of Transportation (Caltrans)</td>
<td>State Agency</td>
<td>07/18/2018</td>
</tr>
<tr>
<td>2</td>
<td>Mojave Desert Air Quality Management District (MDAQMD)</td>
<td>Local Agency</td>
<td>08/03/2018</td>
</tr>
<tr>
<td>3</td>
<td>United States Environmental Protection Agency (EPA)</td>
<td>Federal Agency</td>
<td>08/10/2018</td>
</tr>
<tr>
<td>Organizations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Lucerne Valley Economic Development Association (LVEDA)</td>
<td>Organization</td>
<td>08/20/2018</td>
</tr>
<tr>
<td>5</td>
<td>Center for Biological Diversity, California Native Plant Society, San Gorgonio Chapter of the Sierra Club (collectively “Conservation Groups”)</td>
<td>Organization(s)</td>
<td>08/27/2018</td>
</tr>
<tr>
<td>Individuals</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>“everyactioncustom.com” on behalf of Center for Biological Diversity (CBD) members (1,155 emails total)</td>
<td>Individuals (listed in Appendix A)</td>
<td>08/23/2018</td>
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<td></td>
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<td>08/24/2018</td>
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<td>08/27/2018</td>
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</tbody>
</table>

Comments addressing the adequacy of the Draft EIR/EIS or issues relevant to the environmental review included topics such as, but not limited to, the following:

- Air quality and dust control;
- Biological resources and impacts to local wildlife;
  - Carbonate endemic plants and relinquishment of mining claims to protect carbonate habitat;
  - Raptor and bighorn sheep species conservation efforts;
2.0 COMMENTS AND RESPONSES TO DRAFT EIR/EIS

- The need to provide the public with an opportunity to review the final versions of the Raptor and Bighorn Sheep Conservation Strategies; and
- Impacts to other rare plant species.

- Hydrology and jurisdictional waters;
- Noise impacts on local wildlife;
- Project alternatives and possibility for underground mining; and
- Project cumulative analysis and impacts.

Issues raised in comments that did not speak to the adequacy of the Draft EIR/EIS or that did not otherwise address environmental issues included topics such as, but not limited to, the following:

- Impacts on quality of life;
- General concerns related to inadequate mitigations;
- The need to leave some wildlife for future generations; and
- General opposition to mining operations, the Applicant, and the Project.

Many of the comments submitted were general and asked questions already answered in the Draft EIR/EIS. Other commenters asked for clarification on points addressed in the environmental evaluations. Some comments provided suggestions on the evaluation of impacts and determination of specific mitigation measures or alternatives to the Project.

Comments received indicated that some reviewers disagree with the Draft EIR/EIS conclusions. Reviewers of the same data may arrive at different conclusions. However, the Forest Service and County is required to rely on substantial evidence, which includes “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts,” for evaluating the potential impacts of a project (PRC § 21082.2). Speculation, unsubstantiated opinion or narrative is not substantial evidence (Id.). Nonetheless, all comments have been noted, are included as part of the Project’s administrative record and will be considered by the Forest Service and County decision makers during their Project approval deliberations.

2.2.2 Response to Agency Comments

The following public agencies submitted comment letters:

- California Department of Transportation (Caltrans)
- Mojave Desert Air Quality Management District (MDAQMD)
- United States Environmental Protection Agency (EPA)
Comment Set 1

July 18, 2018

Reuben Arceo
Land Use Services
San Bernardino County
383 North Arrowhead Avenue, 1F
San Bernardino, CA 92415

Tasha Hernandez
Forest Headquarters
San Bernardino National Forest
602 South Tippecanoe Avenue
San Bernardino, CA 92408

Subject: Butterfield & Sentinel Quarry: Expansion (SCH#: 2013021057) – Draft Environmental Impact Report dated March 2018

Dear Mr. Arceo & Ms. Hernandez:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report for the Butterfield & Sentinel Quarry: Expansion (project). The quarries are located approximately 7.5 miles south of the community of Lucerne Valley and 5 miles north of Big Bear Lake within the San Bernardino National Forest in San Bernardino County, California. This project proposes for the expansion of the Butterfield and Sentinel Limestone Quarries. The proposed expansion would include 30.6 acres of disturbance at the Butterfield Quarry, and 64.3 acres of disturbance at the Sentinel Quarry area.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

We have reviewed the Draft Environmental Impact Report. We have no comments at this time.

Please continue to keep us informed of the project and other future updates, which could potentially impact the SHS and interfacing transportation facilities. If you have any questions regarding this letter, please contact Ricky Rivers at (909) 806-3298 or myself at (909) 383-4557.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Mr. Arceo & Ms. Hernandez  
July 18, 2018  
Page 2

Sincerely,  

[Signature]

MARK ROBERTS, AICP  
Office Chief  
Intergovernmental Review, Community and Regional Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Response to Comment Set 1.
California Department of Transportation, District 8 (July 18, 2018)

Response 1-1

This comment states the California Department of Transportation (Caltrans) has reviewed the Draft EIR/EIS and has no further comment at this time. This comment is noted for the record, and no further response is necessary.
Comment Set 2

August 3, 2018

Maya Rohr
Sespe Consulting, Inc.
1365 Hotel Circle South, Suite 370
San Diego, CA 92108

Project: Omya California’s Butterfield Sentinel Quarry Expansion Project
SCH #2013021057

Dear Ms. Rohr:

The Mojave Desert Air Quality Management District (District) has received the Notice of Availability of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for Omya California’s Butterfield Sentinel Quarry Expansion Project. The proposed project would involve the development of known limestone ore resources which would add an additional 40-years life to the Butterfield quarry and an additional 20-years life to the Sentinel quarry. The project also includes expansion of existing Butterfield and Sentinel quarries, expansion of associated overburden placement sites, additional internal access roads, and ancillary facility areas, but does not include any new quarries, new haul roads, or new overburden sites. The proposed expansion would include 30.6 acres of new disturbance at the Butterfield Quarry, and 64.3 acres of new disturbance at the Sentinel Quarry area, totaling to an area of 94.9 acres. The quarries are located approximately 7.5 miles south of the community of Lucerne Valley and 5.0 miles north of Big Bear Lake within the San Bernardino National Forest (SBNF) in San Bernardino County, California.

We have reviewed the project based on the information available to us at this time. We concur with the proposed mitigation measures and project design features, and request that any additional equipment be compliant and permitted appropriately as per District regulations. We also recommend the County require that the following dust mitigation measures be required for the development of the project (enforceable by the District AND by the land use agency):

- Prepare and submit to the MDAQMD, prior to commencing earth-moving activity, a dust control plan that describes all applicable dust control measures that will be implemented at the project;

- The following signage shall be erected not later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum text height, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, with the contact name of a responsible official for the site and a local or toll-free number that is accessible 24 hours per day:
2-3 (cont.)

- Use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.

- All perimeter fencing shall be wind fencing or the equivalent, to a minimum of four feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown dropout. This wind fencing requirement may be superseded by local ordinance, rule or project-specific biological mitigation prohibiting wind fencing.

All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Take actions to prevent project-related trackout onto paved surfaces, and clean any project-related trackout within 24 hours. All other earthen surfaces within the project area shall be stabilized by natural or irrigated vegetation, compaction, chemical or other means sufficient to prohibit visible fugitive dust from wind erosion.

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726, or Kevin Hendrawan at extension 4007.

Sincerely,

Alan J. De Salvio
Supervising Air Quality Engineer

AID/Rh OMYA California’s Butterfield Sentinel Quarry Expansion Project Draft EIR EIS
Response to Comment Set 2.
Mojave Desert Air Quality Management District (August 3, 2018)

Response 2-1

The commenter requests that any additional equipment associated with the Project be complaint and permitted accordingly per Mojave Desert Air Quality Management District (MDAQMD) rules and regulations. Project design feature AIR-1 requires that the Project comply with all relevant MDAQMD regulations and permit conditions to minimize air emissions. This Project design feature must be implemented as described in the Draft EIR/EIS and per the regulations and permit conditions. The Project design features, including BMPs and other environmental protection measures, that are already proposed as part of the Project design are summarized in Table 2-4 within the Draft EIR/EIS. As such, any additional equipment associated with the Project will be complaint and permitted appropriately per the applicable MDAQMD regulations and required conditions.

Response 2-2

The commenter requests that, prior to commencement of earth-moving activities, a Dust Control Plan describing applicable dust control measures be prepared and implemented. Project design feature AIR-1 requires that the Project comply with all relevant MDAQMD regulations and permit conditions to minimize air emissions, including compliance with MDAQMD Rule 403.2 (Fugitive Dust Control for the Mojave Desert Planning Area). As such, Omya has prepared a Dust Control Plan which will be updated as required by the MDAQMD and Mitigation Measures AQ-1 and AQ-2. The Dust Control Plan describes applicable dust control measures that will be implemented by the Project in compliance with MDAQMD Rule 403.2, including the Project design features and mitigation measures identified in the Draft EIR/EIS related to dust control. The following dust control Project design features and mitigation measures are discussed in Section 3.3 of the Draft EIR/EIS and the Air Quality and Greenhouse Gas Impact Analysis (Sespe Consulting, Inc., 2013):

Project Design Features and Environmental Protection Measures Related to Dust Control

- **AIR-1:** Comply with all relevant MDAQMD regulations and permit conditions to minimize air emissions.
- **AIR-2:** Ensure the baghouse for the stationary crusher is in good operation conditions as required by the permit.
- **AIR-3:** Use water or chemical suppressants to control dust at the quarry, crusher site, overburden pads and haul/quarry roads.
- **AIR-5:** Mining activities will be limited or stopped during significant wind events.

Project Mitigation Measures

- **Mitigation Measure AQ-1 (Dust Control – Unpaved Roads):** Unpaved roads will be controlled by at least 80% using methods that are consistent with MDAQMD guidance.
• **Mitigation Measure AQ-2 (Dust Control – Grading):** Areas to be graded and where bulldozer operates shall controlled by at least 85% using methods that are consistent with MDAQMD guidance.

**Response 2-3**

The comment requested additional signage on the Project site entrance. The Butterfield and Sentinel Quarry sites are located within the much larger area controlled by Omya security fencing. The fencing at the Omya property entrance has warning signs as required by current regulations.

**Response 2-4**

The comment requested that water, chemical stabilizers, or a stabilizing layer of gravel, be used to control dust. Please see response to Comment 2-2, which includes reference to Project design feature AIR-3: *Use water or chemical suppressants to control dust at the quarry, crusher site, overburden pads and haul/quarry roads*. As discussed above, a Dust Control Plan has been be prepared and will be updated as required by the MDAQMD and Mitigation Measures AQ-1 and AQ-2.

**Response 2-5**

The MDAQMD requested that all perimeter fencing be wind fencing to minimize windblown dropout off-site. Project design feature GEN-3 states that Omya will only fence areas around the quarries that are necessary for safety and security reasons. This restriction is necessary to minimize impacts associated with the movement of wildlife across and around the Project site, such as bighorn sheep. Therefore, this request is superseded by the need to protect biological resources.

**Response 2-6**

The MDAQMD stated that all maintenance and access vehicular roads and parking areas should be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. The MDAQMD also requested that Omya take action to prevent Project-related track out onto offsite paved roadways.

Please see responses to Comments 2-2 through 2-4 above. The existing Project design features and mitigation measures discussed above will be used to control visible fugitive dust emissions due to vehicles and equipment operating on unpaved road surfaces and parking areas, and due to wind erosion of exposed earthen surfaces and stockpiles. Disturbance of earthen surfaces will be minimized to prevent unnecessary generation of visible fugitive dust from wind erosion. Per Project design feature AIR-3, water or chemical suppressants will be utilized to control dust at the quarry, crusher site, overburden pads and haul/quarry roads. Additionally, per Project design feature AIR-5, mining activities will be limited or stopped during significant wind events.
Project design feature SW-1 and Mitigation Measure GEO-7 requires that the Project comply with Omya’s Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMP) presented therein. Please see Appendix K in the Draft EIR/EIS for a copy of the SWPPP. The SWPPP outlines “good housekeeping” BMPs that will be implemented to prevent Project-related track out onto paved surfaces. Additionally, the SWPPP BMPs recommend that the Project haul roads be sprayed with a dust suppressant semi-annually, which will also prevent track out. However, it should be noted that the Project roads do not directly intersect with any public and/or paved roadways.
Comment Set 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 27, 2018

Tasha Hernandez
San Bernardino National Forest
602 S. Tippecanoe Avenue
San Bernardino, California 92408

Subject: Omya Inc. Butterfield and Sentinel Quarries Expansion Project Draft Environmental Impact Report/Environmental Impact Statement, San Bernardino County, California [CEQ #20180153]

Dear Ms. Hernandez:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500 - 1508, and our review authority under Section 309 of the Clean Air Act.

The Proposed Project involves expanding two existing Omya, Inc. limestone quarries in San Bernardino National Forest, disturbing an additional 30.6 acres at the Butterfield Quarry over the next 40 years and 64.3 acres at the Sentinel Quarry over the next 20 years. In addition to the No Action Alternative, the Draft EIS evaluates two other action alternatives - the Partial Implementation Alternative and the Mixed Production with the White Knob Quarry Alternative.

The Draft EIS does not identify a preferred alternative under NEPA. When a Draft EIS does not identify the lead agency’s preferred alternative, it is EPA’s policy to rate each alternative individually. In this case, we have rated each action alternative as Environmental Concerns - Insufficient Information (EC-2) (see the enclosed “Summary of EPA Rating Definitions”). This rating reflects our concern about the potentially temporary nature of mitigation for permanent impacts from the action alternatives, and the need for additional information in the Final EIS on the effectiveness of that mitigation. The remainder of this letter provides further details and EPA’s recommendations.

Potentially Temporary Mitigation for Permanent Impacts
Project Design Feature CARB-2 and Mitigation Measure BIO-1 are identified in the Draft EIS as mitigation for permanent habitat loss impacts to biological resources. They involve Omya, under the Carbonate Habitat Management Strategy, relinquishing 375 acres of unpatented claim lands following mineral withdrawal, which would make those lands unavailable for future mining. EPA understands that a decision regarding withdrawal will be made by the Secretary of the Interior based on the Forest Service’s Carbonate Habitat Mineral Withdrawal Environmental Assessment, which is currently available for public comment. Whether the mineral withdrawal
would be permanent, with mitigation habitat protected in perpetuity, or only temporary (e.g., 20 years) remains undecided at this time. If the proposed mechanism for protection is temporary, its duration and effectiveness as mitigation for permanent impacts would be subject to subsequent decisions by the Department of Interior regarding whether to renew the withdrawal. If the withdrawal is not renewed, this would almost certainly lead to a net loss of carbonate habitat.

EPA recommends that the Final EIS specify the duration of CARB-2/BIO-1. If, by the time the Final EIS is published, this information remains unknown or the area has been withdrawn only temporarily, we recommend that the Forest Service address the uncertainties in the Final EIS and discuss whether and how additional measures could be implemented to ensure habitat protection in perpetuity. Specifically, we recommend that the Final EIS:

- Discuss any options the Forest Service may have to support permanent protection of lands proposed as mitigation for the proposed project. For example, could the Forest Service designate mitigation lands as unsuitable for future exploration in its future planning for the area?

- Explain the legal instruments that need to be put in place by the Forest Service, Bureau of Land Management (BLM), Omya, and any entity that may receive the mineral rights, to ensure that the mitigation parcels would be successfully protected. If a third-party would hold the mineral rights, identify the likely holder and how restrictions, if any, would be placed on the claims. Disclose any administrative fees or processes required to maintain the claims and how they would be funded.

- Discuss the likelihood of future renewal of the withdrawal, considering the historic use of BLM administrative withdrawals and any reasonably foreseeable scenarios that might result in non-renewal of the withdrawal, and what would happen in the event the withdrawal is not renewed, e.g., whether Forest Service would pursue alternative mitigation measures at that time.

**Adaptive Management Plans**

Appendix F of the Draft EIS includes the draft Raptor Conservation Strategy, which is being developed by the Forest Service, US Fish and Wildlife Service, California Department of Fish and Wildlife (CDFW) and the three North Slope mining companies. The Forest Service, CDFW and the mining companies are also developing a North Slope Bighorn Sheep Conservation Strategy (Mitigation Measure BIO-19). These dynamic, adaptive management plans will provide important guidance for activities at the North Slope mines; however, it is unclear when the plans will be finalized and the mines will implement them. EPA recommends that the final versions of these plans be included in the Final EIS.

**Conformity Analysis**

The DEIS states, in several places (e.g., pp. 3.3-15; 3.3-51; App. 4, p.14), that one of the ways the project could screen-out of conformity analysis is if its emissions are less than 10 percent of the non-attainment area emissions inventory. On April 5, 2010, EPA revised the General Conformity regulations and deleted the regionally significant test at 40 CFR 93.153(i);
therefore, this test is no longer relevant to the conformity discussion. In the Final EIS, please delete the outdated information.

We appreciate the opportunity to review this Draft EIS. Please send a CD of the Final EIS to this office (mailcode ENF-4-2) when it is officially filed with EPA's e-NEPA. If you have any questions, please call me at (415) 972-3521, or contact Jeanne Geselbracht, our lead NEPA reviewer for this project, at geselbracht.jeanne@epa.gov or (415) 972-3853.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of EPA Rating Definitions

cc:
Maya Rohr, Sespe Consulting, Inc.
Reuben Arceo, San Bernardino County
SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Response to Comment Set 3.
United States Environmental Protection Agency, Region IX (August 27, 2018)

Response 3-1

This comment states that the United States Environmental Protection Agency (EPA) rated each alternative pursuant to EPA’s policy when a Draft EIS/EIR does not identify a lead agency’s preferred alternative, and that the EPA rated each alternative as Environmental Concerns-Insufficient Information (EC-2). EPA based its rating on their concern with the potentially temporary nature of mitigation for permanent impacts from the Project and other action alternatives, and the need for additional information in the Final EIR/EIS on the effectiveness of that mitigation.

The responses provided in 3-2 through 3-6 address the EPA’s concern regarding the potentially temporary nature of proposed mitigation measure for permanent impacts. Comments 3-1 is otherwise noted for the record.

Response 3-2

The EPA notes that under the Carbonate Habitat Management Strategy (CHMS), Omya will be relinquishing 375 acres of unpatented claim lands, which would make those lands unavailable for future mining. EPA understands that a decision regarding withdrawal will be made by the Secretary of the Interior based on the Forest Service’s Carbonate Habitat Mineral Withdrawal Environmental Assessment. Under BLM and Forest Service policy and practice, withdrawals such as the withdrawal for this Project are routinely renewed and extended as long as the circumstances for which the withdrawals were initially approved have not changed at the time the withdrawal periods expire.

The BLM, with authority delegated by the Secretary for the Department of the Interior, is charged with administrative responsibility for the withdrawal of lands owned or controlled by the United States for public purposes and for the modification, extension or revocation of withdrawals (U.S. Department of the Interior Department Manual 603 DM 1). The BLM is further responsible for the systematic periodic review of withdrawals to ensure that the withdrawals continue to serve their original purpose. In doing so, the BLM coordinates with applicants and other federal agencies, such as the Forest Service. The Forest Service policy with regard to withdrawals is included in Chapter 2760 of the Forest Service Manual. The Manual states that Forest officers should consider withdrawals for areas of “…critical habitat of endangered species having a very limited range and specific habitat requirements not found elsewhere, and botanical areas.” (FS Manual 2761.03) With regard to mineral withdrawals that have a fixed duration, BLM offices are required to review withdrawals nearing expiration to ensure that the withdrawn lands are the minimum acreage necessary to meet the demonstrated needs of the applicant. If, after consultation with the applicant, the mineral withdrawal continues to fulfill the purpose and need of the withdrawal, the BLM will work with the applicant to renew and extend the mineral withdrawal.
The stated need for the current withdrawal is the protection of federally-listed carbonate endemic plant species and habitat. The proposed withdrawal further implements components of the CHMS, which has been incorporated as a component of the San Bernardino National Forest Land and Resource Management Plan. Ultimately, the purpose of the mineral withdrawal is to permanently protect habitat for these very narrowly distributed species. Each of the species only occurs in the vicinity of the northeastern San Bernardino Mountains and each occurs almost exclusively on carbonate soils. Because the distribution of each species is naturally constrained by the location of suitable soils, the geographic dispersion of such species will not increase over time and it is unlikely that the species will ever be delisted. Therefore, the stated purpose and need of the withdrawal—to protect carbonate plant occurrences and habitat—will continue to exist well into the future, justifying future renewals and extensions of the withdrawal for the life of the Project. As the circumstances for which the withdrawal was initially approved likely will not have changed at the time any initial withdrawal period expires, there is no reason to assume that the withdrawal would not be renewed for the duration of the Project’s operations and in perpetuity. Therefore, the mitigation is considered permanent.

Response 3-3

The EPA recommends that further discussion of identified mitigation for impacts to the federally-listed carbonate endemic plant species (administrative mineral withdrawal) be provided in the Final EIR/EIS to address additional measures that could be implemented to ensure habitat protection in perpetuity. The EPA provided three recommendations that are addressed below in responses to Comments 3-4 through 3-6. This comment is otherwise noted for the record.

Response 3-4

The EPA recommends that the Forest Service discuss any options they may have to support permanent protection of the lands proposed as mitigation for the proposed Project. As an example, the EPA asks if the Forest Service could designate mitigation lands as unsuitable for future exploration in its future planning for the area.

The Forest Service has discussed the temporary versus permanent nature of the identified mitigation requiring the withdrawal of mineral rights for the requested lands with the BLM. As explained above in the response to Comment 3-2, The Forest Service believes that the mitigation provided in the EIR/EIS is sufficient to permanently protect habitat and species as set forth in the CHMS.

An alternative mitigation would be a Congressional legislative withdrawal to mitigate the potential impacts to habitat. However, this potential mitigation was considered and rejected as infeasible. A Congressional withdrawal is a legislative action made by Congress in the form of a public law which could permanently withdraw lands from mineral location and entry under the general mining laws of the United States. However, there is no established procedural mechanism for securing Congressional action on a withdrawal in this instance. For that reason, an administrative withdrawal from the Secretary of the Interior (the identified mitigation in the EIR/EIS) was considered a preferable alternative to achieve the desired mitigation for the Project.
Response 3-5

The EPA recommends that the Final EIR/EIS explain the legal instruments that must be implemented by the Forest Service, BLM, Omya, and any other entity to ensure the mitigation parcels will be protected from future mining claims. If a third-party were to hold the mineral rights, the EPA asks that the Final EIR/EIS identify the likely holder and disclose any administrative fees or processes required to maintain the claims, and how they would be funded.

The Project mitigation for impacts to the federally endangered carbonate endemic plant species consists of both the relinquishment of unpatented mining claims and the transfer of title to private property owned by Omya. Specifically, upon completion of the mineral withdrawal, Omya will formally relinquish any and all interest in approximately 375 acres of unpatented mining claims, the surface of which contain occurrences of the endangered plant species as well as suitable habitat. As discussed above in the response to Comment 3-2, it is reasonable to assume that the relinquishment of the claims will protect the plants in perpetuity. The major threat to the plants comes from mining activity. At the time the withdrawal is complete, Omya will be the exclusive owner of all mining rights within the boundaries of the area proposed for relinquishment. After the mineral withdrawal and claim relinquishment, no new valid mining claims may be located, thereby effectively precluding future mineral development and associated impacts to the plants. Thereafter, the lands will be managed consistent with the San Bernardino National Forest Land Management Plan which incorporates the CHMS.

Pursuant to the CHMS, after mining claim relinquishment (i.e., Habitat Reserve contribution) the Forest Service shall protect the Habitat Reserve from mining activity in perpetuity and any public uses that are incompatible with management of the lands as habitat for the carbonate plant species. With regard to the private property, Omya shall deed the property to the federal government. Upon acceptance, the property becomes classified as “Acquired Lands”. Acquired Lands are not open to location of new mining claims, though the Forest Service has discretion to accept and approve applications for mineral development on Acquired Lands (36 CFR 228 Subpart C), subject to environmental review. However, approval of such applications would be in conflict with the CHMS. This would mean that any future proposed development would not meet the requirements of the environmental review process and would therefore not be approved under NEPA and/or CEQA.

Response 3-6

The EPA further recommends discussing the likelihood of the renewal of the mineral withdrawal and the implications if BLM does not renew the mineral withdrawal. Please see the response to Comment 3-2 above.

Response 3-7

The EPA notes that the Draft EIR/EIS includes a draft Raptor Conservation Strategy (RCS) and also states that the Forest Service, CDFW, Omya and other mining companies in the Analysis Area are developing a North Slope Bighorn Sheep Conservation Strategy. These dynamic, adaptive management plans will
provide important guidance for mining activities on the North Slope; however, as noted in the comment, it was unclear in the Draft EIR/EIS when the plans would be finalized and when the mining companies would implement them.

As discussed in Section 2.1.2 (CR 2: Raptor Conservation Strategy) previously, the final RCS plan, with revisions incorporated based on comments received during the Draft EIR/EIS public review period, has been included in this Final EIR/EIS. Please see Appendix C which includes the final RCS plan. Per Mitigation Measure BIO-7 presented in the Draft EIR/EIS, Omya will participate in the implementation strategy and follow the guidelines set forth in this final RCS plan.

As discussed in Section 2.1.3 (CR 3: North Slope Bighorn Sheep Conservation Strategy) previously, the draft North Slope Bighorn Sheep Conservation Strategy plan has been included in this Final EIR/EIS. Please see Appendix D which includes the draft North Slope Bighorn Sheep Conservation Strategy plan. Public comments received during the 45-day review periods for the previous Draft EIR/EIS and subsequently for his Final EIR/EIS will be considered by the Forest Service and incorporated into the final North Slope Bighorn Sheep Conservation Strategy plan as appropriate. Please see Mitigation Measures BIO-16 through BIO-21 presented in the Draft EIR/EIS which describe Omya’s role in implementing the North Slope Bighorn Sheep Conservation Strategy.

Response 3-8

In response to Draft EIR/EIS comments provided by the EPA, revisions were made to Draft EIR/EIS Section 3.3, Air Quality. Per EPA’s noted revisions to 40 CFR 93.153(i), the discussions and analysis related to federal General Conformity regulations have been revised. On April 5, 2010, the EPA revised the General Conformity regulations [40 CFR 93.153(i)] and deleted the regionally significant test that a project could screen-out of conformity analysis if its emissions are less than 10% of the non-attainment area emissions inventory. As this General Conformity determination is no longer applicable, previous references from Section 3.3 of the Draft EIR/EIS have been removed. Please see Section 3.1.2 which provides the specific Draft EIR/EIS text revisions to address the EPA’s comment.


2.2.3 Response to Organizations Comments

The following organizations provided comments on the Draft EIR/EIS:

- Lucerne Valley Economic Development Association (LVEDA)
- Center for Biological Diversity
- California Native Plant Society (CNPS)
- San Gorgonio Chapter of the Sierra Club
Comment Set 4

From: Chuck Bell [mailto:chuckb@sisp.net]
Sent: Monday, August 20, 2018 8:55 PM
To: Maya Rohr
Cc: craig.maetzold@omya.com
Subject: Omya Quarry Expansions

To: Maya Rohr – Sespe Consulting

From: Chuck Bell, Pres. Lucerne Valley Economic Development Assoc. (LVEDA) 760 964 3118 chuckb@sisp.net
P. O. Box 193
Lucerne Valley, CA 92356

Date: 8/20/18.

RE: OMYA CALIFORNIA - BUTTERFIELD SENTINEL QUARRY EXPANSION PROJECT

Omya representatives presented this project at our 8/7/18 LVEDA meeting. We support and greatly appreciate the limestone producers in our community – critical to our economy. The subject quarries are not visible from the valley. The on-going restoration activities for past and current quarries will mitigate the impacts to the maximum extent possible – especially re: limestone endemics and wildlife (especially big horn sheep).

LVEDA supports the project with the restoration requirements.

(Please acknowledge receipt and let me know if you need a signed copy).

Chuck Bell
Response to Comment Set 4.
Lucerne Valley Economic Development Association (August 20, 2018)

Response 4-1
This comment states the Lucerne Valley Economic Development Association (LVEDA) supports the Project and the proposed restoration activities. This comment is noted for the record, and no further response is necessary.
Comment Set 5

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Suite 370
San Diego, CA 92108
mrrohr@sespeconsulting.com

Re: Omya Inc. Butterfield and Sentinel Quarries Expansion Project – Draft EIR/EIS San Bernardino County, California SCH#: 2013021057

Dear Ms. Rohr:

These comments are submitted on behalf of the Center for Biological Diversity, the California Native Plant Society, and the San Gorgonio Chapter of the Sierra Club (collectively, “Conservation Groups”) regarding the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/S) for the proposed Omya Inc. Butterfield and Sentinel Quarries Expansion Project (the “Project”). The Project is anticipated to result in environmental impacts that will degrade the current ecosystems on and around the Project site. The CEQA and NEPA environmental review for the Project is wholly inadequate and fails to comply with the requirements of the statutes. For the reasons detailed below, we urge approval of the Project be denied, or the agencies should make substantial revisions to the DEIR/S to fully identify and analyze the Project’s significant environmental impacts, provide alternatives that will avoid, minimize and mitigate those impacts, and recirculate the revised DEIR/S for public comment.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.6 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in San Bernardino County.

California Native Plant Society (“CNPS”) is a non-profit environmental organization with 10,000 members in 35 Chapters across California and Baja California, MX. CNPS’ mission is to protect California’s native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

The Sierra Club is a national non-profit organization of with over 3 million members and supporters dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth’s ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human
environment; and to using all lawful means to carry out these objectives. Many Sierra Club members reside in California and the San Gorgonio Chapter of the Sierra Club focuses on protecting lands and resources within the San Bernardino National Forest and in San Bernardino County.

I. The DEIR/S’s Alternatives Analysis is Inadequate and Fails to Comply with CEQA or NEPA.

Pursuant to CEQA, the “policy of the state” is that projects with significant environmental impacts may not be approved “if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects...” (Pub. Res. Code § 21002; Guidelines § 15021(a)(2).) A Project should not be approved if environmentally superior alternatives exist “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (Pub. Res. Code §§ 21002; Guidelines §§ 15021(a)(2), 15126.6.) The Project must be rejected if an alternative available for consideration would accomplish “most [not all] of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” (Guidelines § 15126.6(c).)

Accordingly, the environmental review documents must consider a range of alternatives that would achieve the basic objectives of the project while avoiding or substantially lessening significant environmental effects, and it is essential that the “EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” (CEQA Guidelines § 15126.6.) Moreover, although “an EIR need not consider every conceivable alternative to a project...it must consider a reasonable range of potentially feasible alternatives that will foster informed decision decision-making and public participation.” (Guidelines § 15126.6(a).) Additionally, the “key to the selection of the range of alternatives is to identify alternatives that meet most of the project’s objectives but have a reduced level of environmental impacts.” (Watsonville Pilots Ass’n, v. City of Watsonville (2010) 183 Cal. App. 4th 1059, 1089.) Accordingly, a rigorous analysis of reasonable alternatives to the Project must be provided to comply with this strict mandate. Similarly, NEPA requires that an EIS contain a discussion of the “alternatives to the proposed action.” (42 U.S.C. §§ 4332(C)(iii), (E).) The discussion of alternatives is at “the heart” of the NEPA process, and is intended to provide a “clear basis for choice among options by the decisionmaker and the public.” (40 C.F.R. §1502.14.) NEPA requires the Forest Service to “rigorously explore” and objectively evaluate “all reasonable alternatives.” (40 C.F.R. § 1502.14(a).) Unfortunately, the DEIR/S fails to meet these requirements because the DEIR/S fails to include a reasonable range of alternatives.

The purpose and need for the quarry expansions is identified to be “The Project would assure Omya that the LVPP would have the raw limestone resources needed to meet consumer demand.” (at ES-3). The DEIR/S analyzes only four alternatives – the No Action (Alternative 1), the proposed project (expansion of the Butterfield and Sentinel quarries – Alternative 2), expansion of the Butterfield quarry only (Alternative 3), and a mixed production with the White Knob quarry (Alternative 4). The quarry expansion impacts are identical in Alternative 2 and 4.
except for air quality impacts, where Alternative 4 reduces the impact to air quality over the proposed project.

Surface mining is the only mining method evaluated in the DEIR/S, including the alternatives considered but not carried forward. Underground mining is a typical limestone mining technique implemented “in many areas [where] economic and environmental considerations favor large-scale production by underground mining.”¹ At this location, because of the federally listed plants, the critically imperiled bighorn sheep herd and the numerous sensitive plants and animals that use the area either as occupied habitat or for movement and migration, underground mining should have been considered as an alternative. However, the DEIR/S fails to evaluate a viable alternative method of obtaining the raw limestone resources by underground mining. Underground mining may greatly reduce the impacts to the surface landscape and therefore reducing and or eliminating the need to minimize and mitigate impacts from mining. We urge the Forest Service and the County to revise the DEIR/S and include analyses of an underground mining alternative.

II. The DEIR/S Fails To Adequately Analyze The Impacts of the Project On Biological Resources or Provide Sufficient Mitigation.

The proposed quarry expansion is located in an area rich in sensitive biological resources. The DEIR/S documents 122 sensitive, threatened or endangered or watch list species (plants and animals) that are either present or have potential to be present on the project site or in the analysis area (at Table 3.4-4). While the analysis area acreage is not defined in the DEIR/S, the number of sensitive is robust, indicating a very biologically diverse and sensitive project area.

Mitigation of a project’s environmental impacts is one of the “most important” functions of CEQA. (Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41.) Similarly, To comply with CEQA, mitigation measures must be “fully enforceable through permit conditions, agreements, or other legally-binding instruments.” (Guidelines, § 15126.4 subd. (a)(2).) Furthermore, they must be “incorporated into the project or required as a condition of project approval in such a way that [would] ensure their implementation.” (Fed’n of Hillside and Canyon Assoc. v. City of Los Angeles, (2000) 83 Cal. App. 4th 1252, 1262.) These enforceability requirements ensure the effectiveness of mitigation measures. (See Guidelines, § 15183.5 subd. (b)(2).)

Similarly NEPA requires the agency to: (1) “include appropriate mitigation measures not already included in the proposed action or alternatives,” 40 CFR § 1502.14(f); and (2) “include discussions of...Means to mitigate adverse environmental impacts (if not already covered under 1502.14(f)).” 40 CFR § 1502.16(h). NEPA regulations define “mitigation” as a way to avoid, minimize, rectify, or compensate for the impact of a potentially harmful action. 40 C.F.R. §§1508.20(a)-(c). NEPA requires that the agency discuss mitigation measures, with “sufficient detail to ensure that environmental consequences have been fairly evaluated.”

¹ [Link: https://mineraleducationcoalition.org/minerals-database/limestone/]

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Methow Valley Citizens Council, 490 U.S. 332, 352 (1989). “[O]mission of a reasonably complete discussion of possible mitigation measures would undermine the ‘action-forcing’ function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects.” Id. at 353

A. The DEIR/S relies upon the CHMS for Carbonate Endemic Plants, but the CHMS has not yet been initiated.

Generally, we support the Carbonate Habitat Management Strategy (CHMS) for the long-term conservation of the carbonate endemic plants, their habitat and other species that use the area. In 2006, the San Bernardino National Forest adopted the CHMS as part of its Land Management Plan and relied on the CHMS to provide the needed safeguards that were relied on in the Biological Opinion from U.S. Fish and Wildlife Service for the four federally listed carbonate-endemic plants - Cushenbury buckwheat (Eriogonum ovalifolium var. vineum), Cushenbury milk-vetch (Astragalus albens), Cushenbury oxytheca or puncturebract (Acammoscyphus (formerly Oxytheca) parishii var. goodmaniana) and Parish’s daisy (Erigeron parishii). The County and Omya are also signatory to the CHMS and in doing so, agreed to implement it. We note the following problems with the CHMS implementation in general and with the proposed project specifically.

The CHMS was never initiated. It was to commence with “A series of transactions for the addition of the Furnace Unit Stage 1 Priority Areas to the Reserve (the “Initial Furnace Transactions”)” (CHMS at pg. 25). To our knowledge these initial transactions never occurred and the Furnace Unit Stage 1 Priority Units are not part of the Habitat Reserve. The CHMS clearly states (at pg. 12):

“Stage 1 Priority Areas. No loss of habitat for Carbonate Plants may occur under the CHMS within any Administrative Unit until most of the valuable Carbonate Plant habitat in the “Stage 1 Priority Areas” within such Unit (see Map 3 in Appendix I) has been added to the Habitat Reserve (see Section 9(b)(i)). Such habitat in the Stage 1 Priority Areas plus the portion of the Initial Habitat Reserve within each Unit provide a solid base of conservation within each Administrative Unit that must be part of the Reserve before any loss of Carbonate Plants can occur within that Unit under the CHMS.” [emphasis original]

The DEIR/S fails to identify how much of the Stage 1 Priority Areas have been secured in the Habitat Reserve to date. Without meeting this initial requirement, the proposed project is in violation of the CHMS and cannot rely on CHMS to mitigate impacts to the rare plants and their habitat. The Biological Report erroneously states “All the alternatives would be consistent with the provisions of the CHMS” (Appendix F at pd. pg. 29), when in fact, with the initial conservation investments not met in the CHMS, none of the alternatives are consistent with it.

In fact, the proposed project’s and Alternative 3’s Butterfield quarry expansion (at Figures 2.1 (proposed) and 2-3 (Alternative 3)) appear to expand into the Stage 1 Priority Area (See

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Attachment 1), ultimately dooming the CHMS from ever being able to be implemented. The DEIR/S fails to identify, much less discuss, these potential Stage 1 Priority impacts.

If indeed the proposed project or any other project were developed inside one of the Stage 1 Priority Habitat Areas in the Furnace Unit, it would require an amendment to the CHMS. While the CHMS does allow amendments,2 we would oppose an amendment of this type because it threatens the very integrity of the CHMS overall.

The DEIR/S then proposes “Mitigation for affected T/E plants is a minimum of 3:1 based on conservation value (as described in the CHMS)” (DEIR/S at ES-24 (and elsewhere) Mitigation Measure BIO-1: Relinquish Mining Claims”). But the conservation value determination process in the CHMS, is based on the initial Furnace Transactions being completed – which they are not. Therefore reliance on the mitigation ratio is not sufficient.

The DEIR/S fails to disclose that the Furnace Unit of the Carbonate Habitat Management Area is not fully activated (i.e., the Stage 1 Priority Lands have not yet been sufficiently added to the Habitat Reserve) which misinforms decision makers and the public about the status of conservation for these very rare plants. The CHMS never contemplated a “partial” activation of a unit, rather, three conditions must be met before a unit is deemed to be “activated”. The CHMS states (DEIR/S at 23):

“Within any Administrative Unit, the following must be added to the Habitat Reserve before any loss of habitat may be authorized under the CHMS within that Unit: (A) 100% of the Occupied Habitat that occurs in the Stage 1 Priority Areas; (B) 85% of the Suitable Habitat that occurs within the Stage 1 Priority Areas; and (C) sufficient additional land to preserve such Occupied and Suitable Habitat in one contiguous patch ("Connective Land")... Upon the addition of all such lands to the Habitat Reserve, ESA Compliance may be obtained in the Unit, and the Unit is deemed to be “Activated.” [emphasis added]

Therefore, the proposed approximate 3:1 mitigation in Mitigation Measure BIO-1 (at pg. 3.4-39) is inadequate. In order for the CHMS to be appropriately implemented, the Stage 1 Priority Areas must be added to the Habitat Reserve prior to any disturbance. This most basic requirement of the CHMS could perhaps be implemented through this project proposal by increasing the mitigation commitment and targeting claim relinquishment in the Stage 1 Priority areas first so that the requirements of including all the Stage 1 Priority areas in conservation could be achieved prior to disturbance. However, this is not proposed in the DEIR/S which includes some proposed claim relinquishment but would also allow new disturbance in the Stage 1 Priority Area in violation of the CHMS.

Because the CHMS is not initiated, any action involving a listed species under the CHMS

2 The conditions for amendment are addressed on pg. 39 and state: “(b) Amendments. Any modification to the CHMS that does not qualify as an administrative change under subsection (a) above shall be regarded as an “Amendment.” Amendments shall require (i) the approval of all MOU Parties that could be adversely affected by the proposed Amendment and (ii) the concurrence of the USFWS.”
requires Section 7 consultation with USFWS, including the preparation of a biological opinion. In other words, the DEIR/S cannot rely on the CHMS to be the basis for a Section 7 consultation because the proposed project and mitigation does not comply with the CHMS for the reasons identified above.

Table 3.4-6 of the DEIR/S (at pg. 3.4-69) indicates that the proposed project will impact 14.7 acres of occupied habitat and 17.5 acres of Federally designated critical habitat for the Cushenbury oxytheca. It also identifies parcels that are proposed to have claim relinquishment. These parcels include Crystal Creek 9 (S½), White Rock 1, White Rock 2, Cushenbury 32 and Rattler 18, 19, 20, 21. However Figure 3.4-4 only identifies the locations of Crystal Creek 9 (S½), White Rock 2, Cushenbury 32 and Rattler 20, 21, leaving the public and decision makers uniformed about the location of White Rock 1 and Rattler 18 and 19. Therefore it is unclear if they would actually add to the Reserve assembly or conservation of the rare plants. It is also unclear how many acres of the proposed “mitigation parcels” occur within Stage 1 Priority Areas and Stage 2 Priority Areas, which would be another key issue to implement the CHMS or conservation of the rare plants.

The Rattler 20 and 21 parcels are not even located in the Furnace Unit where the impacts will occur, but in the Helendale Unit miles away from the area of impact.

In addition, there have been attempts to restore some of the listed plants that are more horticultural experiments than fully functional restoration actions and outcomes. In order to justify restoration as a mitigation measure the DEIR/S would need to provide additional information and identify, reference and supply all data regarding successful mine disturbance habitat restoration efforts in the local region, where the listed plants have actually been successfully established as well as the habitat upon which they depend which would include numerous other plants and animals.

B. Any Mitigation based upon claim relinquishment must occur prior to approval of the Project.

While we generally support claim relinquishment as part of the larger Habitat Reserve assembly for the CHMS, we note that BLM segregation and withdrawal, which requires its own NEPA process, has failed to be implemented to date by the BLM for conservation obligations for another rare plant, the federally endangered Lane Mountain milkvetch (Astragalus josephianus) on BLM lands in the west Mojave. The West Mojave Plan Record of Decision was signed in 2006, and required over 10,000 acres of land to be withdrawn from mining as one measure of protection for the milkvetch, which grows no place else on earth. The process was finally initiated in August 2014, through segregation, but the withdrawal was never finalized. BLM’s delay of eight years to start the process and the failure to date to complete the process, is not encouraging to us that the segregations and withdrawals proposed here will occur in a timely

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manner—or at all. The permanent withdrawal, quit-claim and all land transfers must be completed prior to any expansion if the proposed project moves forward.

C. The DEIR/S does not adequately address or mitigate impacts to other rare plants.

Four non-listed but sensitive plant species are identified to occur in the Project Area. Shockley’s rockcress (Boechera shockleyi), Crested milk vetch (Astragalus bicristatus), Bear Valley milk vetch (Astragalus lentiginosus var. sierra), and Parish’s rock cress (Boechera parishii) are all located in the project area (at Table 3.4-4). In addition, Coville’s dwarf abronia (Abronia nana var. covillei and Bear Valley phlox (Phlox dolichantha) are noted to be in the Analysis Area, while Parish’s alumroot (Heuchera parishii) is also noted to be near the project area (at Table 3.4-4). Not only does the DEIR/S rely on the inadequate mitigation for the listed plant species in Mitigation Measure Bio-1 (at pg. 3.4-39), it also relies on that same inadequate mitigation measure to mitigate impacts to the non-listed, sensitive plants.

The analysis in the DEIR/S falls short in analyzing the impacts to these non-listed, sensitive plants in a number of ways. First, the DEIR/S fails to identify any metrics for the sensitive plants—no identification of the number of plants or the amount of the plant’s habitat that will be destroyed. Secondly, the DEIR/S fails to identify any of these same metrics for the sensitive plants on the mitigation parcels/relinquished claims that are proposed to be used as mitigation for impacts to the sensitive plants. Thirdly, Shockley’s rockcress and Parish’s rockcress do not even occur on the proposed mitigation lands (at Table 3.4-4). Therefore, reliance on those lands cannot mitigate impacts to the rockcresses.

Because of the likelihood of impacts to the sensitive plans, the DEIR/S needs provide additional analysis and the mitigation for these plants. The mitigation measures must include, at a minimum, seed collection, deposition and curation of the seed at a seed bank which would insure that seed stock would be available in the future.

D. The DEIR/S does not adequately address or mitigate impacts to Nelson’s Bighorn Sheep

The Cushenbury bighorn sheep herd is isolated and declining. The DEIR/S states “The Cushenbury bighorn sheep herd is currently believed to be about 15 individual animals, down from an estimated 40 to 50 in the 1990s.” (at pg. 3.4-39). The incredibly small number of animals in the Cushenbury herd threatens the very existence of the herd absent any additional threats. Data indicates that bighorn sheep herds with fewer than 50 sheep are in danger of extinction within 50 years. Clearly the Cushenbury herd is critically at risk of extinction. The DEIR/S also points to additional concerning issues as follows:

4 The local credentialed seed bank is Rancho Santa Ana Botanic garden http://www.rsabg.org/seeds-conservation
5 Berger, J. 1990.
“Lambing areas have not been validated. CDFW’s tracking studies of the Cushenbury herd have found use by bighorn sheep around the existing Butterfield and Sentinel Quarries, the Project Site, Crystal Creek and Furnace Canyon.” (at 3.4-93)

The DEIR/S states that “No lambing habitat is expected to be affected.” (at 3.4-93), but provides no data to back up that statement and thus direct conflict with the prior statement that “Lambing areas have not been validated” (at 3.4-93). The lack of data on the Cushenbury herd of bighorn precludes any realistic analysis of potential impacts from the proposed project.

Instead, the DEIR/S relies a series of inadequate mitigation measures as follows:

- **Bio-1 - Relinquishment of Mining Claims** – The DEIR/S recognizes that “data indicate that the claims are not important movement corridors for Nelson’s bighorn sheep” (at pg. 3.4-49); and “the areas associated with Mitigation Measure BIO-1 are not known to be used frequently by bighorn sheep” (at pg. 3.4-93), so while there may be some benefit to the bighorn, the benefit may be negligible.

- **Bio-6 - Wildlife and Plant Awareness** – We would expect that awareness training is already being implemented at the Omya facilities. The sensitive plants and animals have been protected for several decades and a responsible facility should already be providing training to their employees about these species. If training is already occurring, it is unclear how this mitigation measure would actually further mitigate the proposed impacts. More information needs to be provided.

- **Bio-16 - Bighorn Sheep Foraging Habitat** – Instead of conserving bighorn sheep foraging habitat to offset impacts to developing almost 95 acres of foraging habitat, this “mitigation measures” proposes to allow water trucks, used to control dust on the haul roads, to continue overspraying roadside vegetation, where the extra water creates plant growth. While bighorn will undoubtedly forage on these plants, it also brings bighorn into harm’s way by encouraging them to forage adjacent to or on the haul roads. Because this proposed mitigation will bring sheep into harm’s way, it is inappropriate as a measure to mitigate impacts to the foraging habitat. Additional mitigation is needed.

- **Bio-17 - Bighorn Sheep Mortality Reporting** and **Bio-21 - Bighorn Sheep Employee Awareness Training** – We would expect that bighorn sheep mortality reporting and Employee Awareness Training is already being implemented at the Omya facilities. This isolated herd of bighorn sheep has been of concern to California Department of Fish and Wildlife (CDFW) for years and a responsible facility should already be providing training to their employees about this species, including noting any mortalities and reporting them to CDFW. If mortality reporting and employee awareness is already occurring, then it is unclear how this mitigation measure would actually further mitigate the proposed habitat impacts. More information needs to be provided and additional mitigation may be required.
• Bio-19 - North Slope Bighorn Sheep Conservation Strategy – While we support a Conservation Strategy for the north slope bighorn sheep (and Omya’s participation in it), the mitigation measure only references the development of a Draft plan, when a final implemented plan is what is necessary in order for this mitigation measure to potentially mitigate impacts. The mitigation measure provides no timeline on when a draft is to be produced much less a final plan. The draft plan needs to be provided to the public for review and should be included in this DEIR/S for review.

The points listed as “to include” in the North Slope Bighorn Sheep Conservation Strategy once it is developed are also inadequate, for a number of reasons including as follows:

  o “Guidelines/thresholds for population status that would trigger augmentation of the herd” (at pg. 95) – while we aren’t opposed to identifying a threshold trigger for augmentation, it would be ecologically more prudent and less expensive to assure habitat including lambing areas are protected from development and other impacts. We recognize that it likely that this population, because of its incredibly low population numbers, now requires augmentation to prevent inbreeding and possible extirpation. However, the goal of the plan needs to be the conservation and preservation of habitat conditions that support a self-sustaining herd of bighorn. As stated in the DEIR/S, it appears that augmentation would be a key requirement to keep this herd from being extirpated, and that’s hardly a long-term conservation strategy;

  o “A strategy/guidelines for developing water sources to respond to drought years” (at pg. 95) – the strategy needs to also address climate change and its effects on the water availability in the herd management area;

  o “Herd monitoring methodology and objectives” (at pg. 95) – Goals and objectives for the Conservation Strategy should dictate a scientifically rigorous monitoring methodology for the bighorn population.

The plan needs also identify conservation mechanisms for conserving lambing areas, foraging areas, movement corridors. It should try to re-establish linkages with the San Gorgonio herd6 in order to help maintain genetic integrity.

Relying on this unwritten plan, which is not even available in draft form, with no firm timeline for finalization, much less implementation, fails to show that the impacts to the habitat of the Cushenbury herd of bighorn from the mining expansion will be adequately mitigated.

• Bio-20 - Future Conservation and Management – Until the North Slope Bighorn Sheep Conservation Strategy is finalized, it is unclear what funding will be necessary to implement it. Too often funding falls way short of what’s actually needed by wildlife and land management agencies to implement plans that mitigate impacts.

6 Blech et al 1990
Therefore, it is premature to include this mitigation measure when the wildlife and land management agencies have not even produced the plan.

E. Raptor Conservation Strategy

The idea of addressing raptor conservation on the north slope of the San Bernardino mountains is a forward thinking and important step in addressing the ongoing declines of these special birds. We note that the Raptor Conservation Strategy is available in draft form (at Appendix F-4) and therefore offer the following comments on it.

1. The strategy includes at least two fully protected raptors under California law, therefore no take of these birds can be authorized without a Natural Communities Conservation Plan in place.
2. While we support DF-6 which states “No recreational target shooting will occur on NFS lands.” (DEIR/S, Appx. C at 31) additional language needs to be added regarding allowing the use of only non-lead ammunition. California legislation is phasing out the use of lead ammunition to reduce impacts to the environment. Introducing this sensible requirement into the Raptor Conservation Strategy will not only align it with the requirements of the State but will benefit all carrion scavengers.

As with the other species that will be impacted by the propose project, the diminishing available habitat is of over-arching concern. While we recognize that reclamation of abandoned mining areas is important, the reclaimed lands will never achieve the ability to support species that undisturbed habitat does, particularly on the arid north slope.

While we recognize that the Raptor Conservation Strategy will be updated over time, it still needs to be finalized and adopted into the LMP for the National Forest. The DEIR/S provides no timeline for finalization and until it is finalized and implemented, it appears premature to rely on its implementation and to assume what funding will be needed for various conservation efforts without knowing the full scope of what is actually going to be implemented in the final document. Additionally if it is implemented as the CHMS has been – or in this case – not implemented – we do questions the usefulness of the effort. These strategies will only prove their merit through finalization and successful implementation.

F. Project Impacts to Other Highly Sensitive Animal Species Inadequately Analyzed

The Analysis Area and proposed quarry expansions have the potential to impact numerous sensitive reptile and amphibians that use the steep slopes and rock outcrops on the north slope. These species include but are not limited to Southern Rubber Boa (Charina bottae unbrataea), Large-Blotched Ensatina (Ensatina klauberti), Yellow-Blotched Ensatina (Ensatina eschscholtzii), Southern California Legless Lizard (Anniella stebbinsi), Northern Three-Lined Boa (Lachomura occulta), San Bernardino Ringneck Snake (Diadophis punctatus modestus), San Bernardino Mountain Kingsnake (Lampropeltis zonata parvifurca), Two-Striped Garter Snake

1 https://www.wildlife.ca.gov/hunting/nonlead-ammunition
(Thamnophis hammondii), Coast Patch-Nosed Snake (Salvadora hexalepis virguloides). While these species are mobile, it is unlikely that they could flee quickly enough to avoid impacts to their habitat during quarry expansion or from daily mining activities. The DEIR/S recognizes that impacts will occur to these species from the mining expansion, yet fails to put in place any safeguards; safeguards that could, for instance, include preconstruction clearance surveys and road clearing for heavy equipment movements which would help minimize impacts to these sensitive species.

The Analysis Area and proposed project site are also identified as providing habitat for numerous mammals including Long-eared Myotis (Myotis evotis), Fringed Myotis (Myotis thysanodes), Long-legged Myotis (Myotis volans), Small-footed Myotis (Myotis ciliolabrum), Western Red Bat (Lasiurus borealis), Spotted Bat (Eurymops macrotis), Townsend’s Big-eared Bat (Corynorhinus townsendii), Pallid Bat (Antrozous pallidus), Mexican Free-tailed Bat (Tadarida brasiliensis), Pocketed Free-tailed Bat (Nyctinomops femorosaccus), Western Mastiff (Bonneted) Bat (Eumops perotis), Yuca Myotis (Myotis yumanensis), Little Brown Myotis (Nycticeius luxificus), San Bernardino Flying Squirrel (Glaucomys sabrinus californicus), San Diego Pocket Mouse (Chaetodipus talaris fallax), San Diego Desert Woodrat (Neotoma lepida intermedius). While the DEIR/S does analyze impacts to the San Bernardino Flying Squirrel and recognizes that impacts will occur to these species from the mining expansion and operations, it fails to put in place any safeguards; safeguards that could, for instance, include preconstruction clearance surveys which would help minimize impacts to these sensitive species.

II. The DEIR/S’s Analysis Of The Project’s Impacts To Waters Of The State, Federal Waters and Forest Service Riparian Conservation Areas Is Flawed.

The proposed expansion of the Sentinel quarry will impact 0.089 acres of a drainage that forms the headwaters of the Mojave River (at pg. 3.8-8) and is determined to be jurisdictional Waters of the US and the State (at pg. 3.4-97). Mitigation Measure Bio-22 - Jurisdictional Waters and Agency Consultation – requires subsequent consultation with state and federal agencies in order to assess “if regulatory permits or approvals (i.e.: Streambed Alteration Agreement, coverage under the National Permit, Waste Discharge Request/Section 401) would be required and if considered necessary, the appropriate permits and/or approvals shall be obtained.” (at pg. 3.4-98). Consultation with the requisite state and federal agencies is not mitigation, but a requirement under the federal Clean Water Act and the State’s Porter-Cologne Act. The DEIR/S fails to inform the public and decision makers about the likely impacts to these important water resources and this information needs to be provided in a revised and recirculated DEIR/S.

The DEIR/S identifies that the project would impact Riparian Conservation Areas (RCAs) (at pg. 3.4-6) and provides a map (at Figure 3.4-2). However, the DEIR/S fails to fully analyze the impacts of the proposed project to these important resources. While the DEIR/S does identify the width of the RCAs and that “There are several RCAs within or adjacent to the Project Area as shown on Figure 3.4-2” (at pg. 3.4-6), it does not implement the Forest Service’s Five-Step
Project Screening Process for Riparian Conservation Areas. This screening process and subsequent impact analysis needs to be provided in a revised and recirculated DEIR/S.

III. The DEIR/S Downplays The Noise Impacts Of The Project on Wildlife.

The DEIR/S briefly discusses how noise generally associated with mining activities affects wildlife and states that some wildlife have abandoned the haul road-adjacent habitat due to mining activities (at pg. 3, 4-51). However, the DEIR/S does not actually analyze the impacts to wildlife from noise. While the DEIR/S relies on GEN-1, 2, 7, 8 and 9 (found only in Appendix F1) to mitigate impacts from noise on wildlife, only GEN-9 addresses noise – and blasting noise only – and allows “mine employees shall wait until animals have moved from the area or may use sound such as shout, vehicle or air horns to move them out of the blast area prior to detonation of any blasting materials” (Appendix F1 at pg. 37). Of course we are supporting of having animals move out of harms’ way, but the DEIR/S fails to analyze the short- and long-term impacts of elevated noise in the proposed project area on wildlife. As Francis and Barber (2013) state “there are many hidden costs of noise exposure (e.g. compromising predator/prey detection or mating signals, altering temporal or movement patterns, increasing physiological stress).”

IV. The DEIR/S Does Not Accurately Disclose The Cumulative Impacts Of The Project.

CEQA defines “cumulative impacts” as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” (CEQA Guidelines § 15355.) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project “when added to other closely related past, present, and reasonably foreseeable probable future projects.” (CEQA Guidelines § 15355(b)).) And while an agency is not expected to foresee the unforeseeable, it is expected to use its “best efforts to find out and disclose all that it reasonably can.” (CEQA Guidelines § 15144; see also City of Richmond, supra, 184 Cal.App.4th at 96; Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal. 4th 412, 428 [hereinafter “Vineyard”].) NEPA similarly requires the analysis of cumulative impacts. The purpose of analyzing cumulative environmental impacts is to assess adverse environmental change “as a whole greater than the sum of its parts.” (Environmental Protection Information Center v. Johnson (1985) 170 Cal.App.3d 504, 625.) Absent meaningful cumulative analysis there would be no control of development and “piecemeal development would inevitably cause havoc in virtually every aspect of the [ ] environment.” (King County Farm Bureau v. City of Enumclaw (1990) 221 Cal.App.3d 692, 721.)

As a preliminary matter, the DEIR/S does not even include a separate section on cumulative impacts. Instead, discussion of cumulative “effects” is included in a piecemeal manner in the DEIR/S. For example, in the biological resources section, the DEIR/S refers to private lands

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5-24 (cont.)

5-25

5-26

* Appendix E - Five-Step Project Screening Process for Riparian Conservation Areas

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projects and public lands projects described in Appendix F-1 that may contribute to cumulative biological impacts, but the DEIR/S does not actually discuss the potential impacts these projects would bring to various resources anywhere else in the cumulative analysis section. Instead it defaults to general statements such as: “These projects either have been or will be evaluated in conjunction with their respective approval requirements and for consistency with habitat and wildlife conservation strategies” (at pg. 3.4-103). To the extent the other sections of the DEIR/S mention cumulative impacts, these sections suffer from the same defect. Moreover, the DEIR/S nowhere considers the cumulative impacts of operating the mining up to 2055. The DEIR/S must be re-circulated to include an adequate analysis of additional cumulative impacts resulting from the Project, as well as from the foreseeable projects identified.

The DEIR/S’s cumulative impacts discussion also is deficient because it does not properly “define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic area,” which the CEQA Guidelines clearly require. (See Guidelines § 15130(b)(3)).

V. Conclusion

Thank you for the opportunity to submit comments on the Project and the DEIR/S. We look forward to working to assure that the Project and environmental review conforms to the requirements of state and federal law and to assure that all significant impacts to the environment are fully identified and analyzed, and a range of alternatives is evaluated that would avoid, minimize and mitigate those impacts. In light of many significant, unavoidable environmental impacts that will result from the Project and the inadequate environmental review to date, we strongly urge the Forest Service and the County not to approve the Project as proposed or to provide additional environmental review and consideration of a range of alternatives in a revised and recirculated DEIR/S. Please do not hesitate to contact the Conservation Groups with any questions.

Sincerely,

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References (attached)

https://repository.si.edu/bitstream/handle/10088/3802/berger1990a.pdf


http://files.cst.unr.edu/cesu/NPS/C8U/2008/08_10Crooks_N8P_wildlife%20acoustics_13rpt.pdf
Attachment to Comment Set 5

Attachment 1
References
Persistence of Different-sized Populations: An Empirical Assessment of Rapid Extinctions in Bighorn Sheep

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Abstract: Theory and simulation models suggest that small populations are more susceptible to extinction than large populations; yet, assessment of this idea has been hampered by lack of an empirical basis to address the problem by making use of long-term data on vital rates and genetic demographic and weather data spanning up to 70 years of 122 bighorn sheep (Ovis canadensis) populations in southwestern North America. Analysis reveals that: 1) 100 percent of the populations with fewer than 50 individuals went extinct within 50 years; (2) populations with greater than 100 individuals persisted for up to 70 years; and (3) the right size of population was not likely to be caused by food shortages, severe weather, predation, or interspecific competition. These data suggest that population size is a marker of persistence in sheep, and they indicate that local extinction cannot be overcome because 50 individuals, even in the short term, are not a minimum viable population size for Bighorn Sheep.

Resumen: La teoría y modelos de simulación sugieren que las poblaciones pequeñas son más susceptibles a la extinción que las poblaciones grandes, pero la evaluación de esta idea ha sido obstaculizada por falta de un base empírica. Se utilizan datos altos, prolongados para estudiar el tiempo de persistencia de las poblaciones de diferentes tamaños y proporcionan datos demográficos y climáticos de un periodo que abarca hasta 70 años para 122 poblaciones de ovejas Big Horn (Ovis canadensis) en el suroeste de Norte América. Los análisis revelan que: 1) todo accede de las poblaciones con menos de 50 individuos se extinguieron en 70 años. 2) Las poblaciones con más de 100 individuos persistieron hasta los 70 años. 3) La pérdida de población de probabilidades se ha debido a factores de extinción, como sequías, predación, competencia interespecífica, etc., datos sugieren que el tamaño de una población es un indicador de persistencia, y que una extinción local no puede ser superada, ya que 50 individuos no representan un tamaño de población mínima viable para las ovejas bighorn vivo en el corto plazo.

Methods, Sources of Data, and Limitations

I collected information on 129 native populations from five states—California, Colorado, Nevada, New Mexico, and Texas (Table 1). Excluded were states where sheep now occur solely because of reintroductions by humans (Oregon and Washington), states that did not respond to my queries (Arizona), and states whose data span less than two decades (Utah). Also excluded were populations for which only one size estimate was available. Populations were included only when estimates were published or provided by responsible management agencies, species or university biologists who had multiple ground or aerial census, since the focus of my analysis was on persistence of native populations. I did not include extinct native populations for time periods after sheep had been reintroduced to them, only two Nevada populations and one New Mexico population were in this category. The sources I used were Bove & Jones (1973), Beal (1987), Burtcher (1980), Campbell (1988), Davis & Taylor (1991), DeFoe & Gifford (1981), Druzecky (1970), Goodwin (1982), Gross (1960), Jones (1958), Lenz (1979), McQuilken (1978), Musser (1962), Otter (1951), Sands (1964), Weaver (1972), Weaver & Mench (unpublished), Weaver & Mench (unpublished), Weltsch (1989), Weltsch & Weltsch (1961), California Fish and Game (unpublished), Colorado Division of Wildlife (unpublished), National Park Service (Death Valley), Nevada Department of Wildlife (unpublished), and New Mexico Fish and Game (unpublished).

To be conservative, I included data from an additional 94 populations since past estimates of population size were not available, even though it was known that these populations had undergone recent extinctions (Weltsch et al. 1967). Because my goal was to estimate persistence by population area, I relied on data sources that provided actual estimates rather than those that merely noted the presence or absence of sheep. Persistence was estimated for each decade up to 70 years, the maximum period for which data were available. To minimize the confounding influence of sampling intervals, only the latest annual census per decade was used. I considered a population to be extinct only after two or more censuses failed to provide evidence of its existence.

To estimate primary productivity, I used precipitation records from Climatology of the United States and estimated on the assumption that each high-density population data were unavailable for 7 of the 129 populations. For each of the remaining 122 sites, rainfall-related correlations were used to examine the relationships between precipitation and time (years) (Table 1).

were estimated by asking whether each population was present (P) or extinct (E) at any time (t), where t = 1-7 and refers to decades of possible persistence. In this study, the probability of persistence was calculated by categorizing the presence or absence (extinctions) of populations by size and time as follows: If P = 0 or T = 1, then SP = SP + 1 and SE = SE + 1. However, if S = 0 or T = r + 1, then SP = SP + 1. SP refers to the frequency of populations present, and SE to the frequency of extinctions for size, and time. This procedure applied to N populations yields a histogram for incremental periods (in this case 10 years) but because of uneven sampling, by management agencies or researchers, sample sizes differed among decades. For example, if hypothetical population X consisted of 20 animals in 1988 and was extinct in 1988 when recensused twice, then a maximum persistence time of 20 years was assigned.

When dealing with census data from different management agencies and techniques that vary among years and habitats, it is difficult to remove potential biases and to standardize data sets. Clearly, methods used four or five decades ago will be less precise than those used today, and there is no straightforward way to deal with this problem. Therefore, I must assume that larger populations were more detectable than smaller ones and that any biases reported in the overestimation of populations of large size should be cancelled by the effects of underestimation of populations of smaller sizes. However, it is also possible to contrast data on persistence in relation to population size at different time periods. Assuming that the persistence trajectories of different-sized populations are real, then analysis based on recent and older population estimates should not differ. If this were the case, it would bolster support for the idea that population estimates, while being biased to an unknown extent, do not alter the interpretations since patterns detected from the more recent data would be consistent with those found during census periods from decades ago.

Persistence and Population Size

Populations of 100+ sheep persisted for up to 70 years, those with fewer than 50 individuals were extinct in less than 50 years, while those with between 51–100 sheep existed for about 60 years (Fig. 1). Because, at year 60, the sample is too small of (to two historic populations, none persisted), it is not possible to ascertain whether sheep in the 51–100 category fall into the persistence trajectories of the smaller or larger populations.

The extinctions were related to initial population size and the number of years over which data were available (three dimensional contingency analysis: $X^2 = 13.87, df = 46, p < 0.001$). For example, for populations of 100+, initial population size was not independent of year ($X^2 = 22.10, df = 16, NS$). It is also possible to test further for partial dependence (Zar 1984), not by relying on the entire data set, but by using only those data for the last two decades, to the time frame when census methods have presumably become more refined. While time periods (in this case, two decades, T = 2) had only a slight effect on persistence ($X^2 = 20.45, df = 12, 0.05 < p < 0.10$), extinctions were not independent of initial population size ($X^2 = 39.87, df = 6, p < 0.001$), confirming that population size by itself is a reasonable measure of persistence. When data over all time periods are considered, a positive relationship between population size and persistence time existed (Fig. 1; $r = +0.54, p < 0.0005$). Hence, these data offer the strongest evidence yet that native populations below a threshold size (N = 50) are unable to resist rapid extinction.

Tests of Potential Causes of Rapid Population Losses

To what extent do the persistence times reflect recolonization rather than extinction? Individually, precision is lost by lack of knowledge on recolonization frequency. However, the persistence estimates are conservative and underestimate population losses because any recolonization would result in increased persistence rather than local extinction. Furthermore, the available data indicate that extinction has far outstripped recolonization, 34 to 2 (one-tailed binomial test; p < 0.001), although recolonizations often go undetected (Bleich et al. 1990).

Four variables that may mediate the rapid demise of these small populations may be examined: (1) climate, (2) food shortages, (3) predation, and (4) interspecific competition. None of these appears to be causally related to the rapid extinctions. If the deaths were a consequence of severe weather, then populations in areas of extreme conditions should be in greater jeopardy than those where conditions are more benign. I examined this possibility by contrasting environmental severity (as measured by the mean number of annual days in which mean maximum daily temperature was below or above 0°C) between populations greater and less than 50 sheep. Since 10 percent (N = 50) of the small populations occupied areas where temperatures fell below 0°C for more than one month on average (in contrast to 44 percent [N = 62] of the larger populations; Z = 3.87; p < 0.0001), it is unlikely that climate factors were the primary reason for the rapid loss of small populations.

Perhaps declining food supplies were responsible, especially because evidence from one desert population indicates that few lambs are recruited when precipitation is low (Douglas & Leslie 1986). If this were the case,...
Table 1: Summary of location, year of first population census, number of years of precipitation data (N), r, values, and probability that precipitation change over time were significant. \( r \geq 0.50; ** p < 0.01; *** p < 0.001 \).

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<td>20</td>
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</table>
For the populations that I examined, then a negative relationship between food abundance at each site and time should be characteristic of populations experiencing extinctions. Also, larger populations should not be associated with declining food abundance because it is the smaller populations that are more susceptible to extinction (Fig. 1). Animal precipitation was used as an indicator of food abundance since it is a good predictor of primary productivity in arctic environments (Johnson, 1986; Coe et al., 1976), and data on precipitation were available as far back as 1915. At none of the 122 sites was the relationship between estimated primary productivity and food negative, suggesting that declining food was not responsible for the extinctions (Table 1). In contrast, 17 percent of the 122 sites had increasing estimated plant productivity and 5 (all with fewer than 50 sheep) experienced extinction (Table 2). No association occurred between the size of extinct populations and estimated plant productivity (o = 0.12, df = 1, NS; Table 2). This nonsignificant relationship remains unaddressed by exclusion of populations from Colorado where precipitation is often in the form of snow. While numerous factors may account for the declines of small populations, neither food nor weather appears to be among them.

The last two potential factors responsible for the rapid extinctions, predation and interspecific competition, appear to have played minor roles, if any. Though accounts of predation on sheep are available (Murie, 1944; Geist, 1974; Kelly, 1980), carnivore densities are linked to prey biomass (Brookman, 1970; Samuels & Samuels, 1989). Where sheep densities are low, as in the Mohave desert, and populations are declining, no evidence indicates that predation effectively reduces population size, especially because prey items vary with availability (Stephens & Krebs, 1986). And while mountain lions (Felis concolor) are thought to be more efficient predators of sheep than the coyote (Canis latrans) (McClellan, 1982; Berger, 1991), lions do not occur in many of the desert ranges where sheep are found (Smallwood & Fitzhugh, 1987). Finally, if interspecific food competition were responsible for declines of native sheep, cattle or other herbivores should cooccur sheep habitat and share the same food. Although cattle (and wild horses) prefer grasses, as do native sheep (Bailey, 1980; Hanley & Hanley, 1987), these species occupy different habitats, and interspecific effects on sheep population size have yet to be demonstrated (Berger, 1986).

### Potential Genetic and Ethological Effects

In contrast to the negative evidence given above, some data suggest that both genetic (Schwartz et al., 1986)

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**Table 1. Continued.**

<table>
<thead>
<tr>
<th>Site</th>
<th>Year</th>
<th>N</th>
<th>r_</th>
<th>P</th>
<th>Site</th>
<th>Year</th>
<th>N</th>
<th>r_</th>
<th>P</th>
</tr>
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<td>1947</td>
<td>25</td>
<td>+.84</td>
<td>NS</td>
<td>Salinas Mar</td>
<td>1937</td>
<td>25</td>
<td>+.49</td>
<td>NS</td>
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<td>Payette</td>
<td>1947</td>
<td>25</td>
<td>+.18</td>
<td>NS</td>
<td>Sonora</td>
<td>1937</td>
<td>25</td>
<td>+.01</td>
<td>NS</td>
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<tr>
<td>Wash</td>
<td>1947</td>
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<td>-.30</td>
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<td>New Mexico</td>
<td>1953</td>
<td>26</td>
<td>+.24</td>
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<tr>
<td>Carmano</td>
<td>1947</td>
<td>25</td>
<td>+.88</td>
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<td>-.68</td>
<td>NS</td>
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</table>

Weather stations used for data were located at: California (Bakersfield, Brawley, Hemet, Indio, Thousand Oaks, Palm Springs, San Diego); Arizona (Agua Prieta, Yuma); Nevada (Tahoe City, Reno); New Mexico (Alamogordo, Truth or Consequences, Santa Fe); Texas (Brownsville, Corpus Christi).
Table 2. Summary of effects of significant (p < 0.05) trends in estimated plant productivity (PP) over periods of demographic changes for 122 bighorn sheep populations. Small = 50 sheep; large = > 50 sheep. (see Table 1 for locations and relationships between estimated PP and time.)

<table>
<thead>
<tr>
<th>Percentage of field sample</th>
<th>Number of extinctions</th>
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<tr>
<td></td>
<td>Small</td>
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<tr>
<td>PP increasing (N = 21)</td>
<td>17.2</td>
</tr>
<tr>
<td>PP decreasing (N = 90)</td>
<td>6</td>
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<tr>
<td>No relationship (N = 101)</td>
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Conclusions

The data presented here illustrate that population size can be used to gauge the persistence of populations, especially when factors such as inclement weather, food shortages, predation, or interspecific competition fail to exacerbate extirpation. Nevertheless, it is clear that small (and especially single) bighorn populations are in imminent need of enhanced management to maximize their persistence. Data for numerous species, including bighorn sheep and the sole species of black-footed ferrets (Mustela nigripes) (Clark 1987), Thorne & Williams 1988), confirm that exposure to extrinsic factors, mainly epizootics, precipitation levels, and rapid extirpation.

Small, fragmented populations are to be conserved, then it no longer seems wise to await the accumulation of additional data to determine whether such populations of other species become extinct as rapidly as native sheep. Nevertheless, it is important to recognize that species differing from sheep in body size, generation times, density, geographic levels (Hodgson 1987), and perhaps economic status should differ in persistence times. Presently, data on other animals are lacking, but historical approaches may prove to be the best way to evaluate the generality of persistence models, perhaps through use of information on widely fluctuating population sizes in species such as vole, lagomorphs, and mice.

Acknowledgments

I thank the following people and agencies for graciously offering advice, support, and access to their data: California Department of Fish and Game (V. Hecht, R. Wroten), Colorado Division of Wildlife (M. Blun, J. Ellenberger, L. Frank), Nevada Department of Wildlife (D. Delaney, M. Hess, G. Tschetter), and New Mexico Fish and Game (B. Morrison). I benefited greatly from the critical advice and manuscript reviews offered by Carol Cunningham, Charles Douglas (National Park Service), David Ellerblad, Marco Festa-Bianchet, Valenius Geis, Stephen Jenkin, Linda Keeler, Hal Kleifield, Craig Parker, Arne Pacey, Robin Tausch, John Wehausen, and an anonymous reviewer, and I wish to say thank you!

Literature Cited

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Desert-dwelling Mountain Sheep: Conservation Implications of a Naturally Fragmented Distribution

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Abstract: Mountain sheep (Ovis canadensis) are closely associated with steep, mountainous, open terrain. Their habitat consequently occurs in a naturally fragmented pattern, often with substantial expanses of unsuitable habitat between suitable patches; the sheep have been noted to be slow colonizers of vacant suitable habitat. As a result, resource managers have focused on (1) conserving "traditional" mountainous habitats, and (2) forced colonization through reintroduction. Telemetry studies in desert habitats have recorded more intermountain movement by desert sheep than was previously thought to occur. Given the therefore unrecognized viability of mountain sheep, we argue that existing corridors of "nontraditional" habitat connecting mountains

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Resumen: Los borregos cimarrones (Ovis canadensis) exhiben una asociación cercana con terrenos montañosos escarpados y abiertos. En consecuencia, su hábitat ocurre en un patrón naturalmente fragmentado, frecuentemente con grandes extensiones de hábitat impropiamente separando las áreas apropiadas; y se ha notado que los borregos cimarrones son lentos en colonizar hábitat apropiado vacante. Como resultado de estas observaciones, gerentes de recursos naturales han enfocado su atención en (1) conservación de hábitat montañoso "tradicional" y (2) colonización forzada por reintroducción. Estudios de telémetro en hábitats desérticos han demostrado más movimiento intermontaño que antes se creía que ocurriera. Dado la tendencia de seguir hasta ahora no reconocido de los borregos cimarrones, proponemos que correcciones actuales de hábitat no tradicional que conectan montañas merecen consideración adecuada para conservación. Además, se debe reconocer la importancia para poblaciones relativamente aisladas de los borregos cimarrones de áreas pequeñas de hábitat montañoso que, aunque

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ranges be given adequate conservation consideration. Additionally, small areas of mesic montane habitat that are not permanently occupied but that may serve as "stepping stones" within such corridors must be recognized for their potential importance to relatively isolated populations of mountain sheep. We discuss the potential importance of such corridors to other large, unique species.

Introduction

Wilcox and Murphy (1985:884) echoed an increasingly common concern when they stated, "That current ecological theory is inadequate for resolving many of the details should not detract from what is obvious and accepted by most ecologists: habitat fragmentation ... is the primary cause of the present extinction crisis." Indeed, fragmentation has been a central theme of much recent literature dealing with conservation biology (e.g., Soule & Wilcox 1980; Schonewald-Cox et al. 1983; Harris 1984; Lehmkuhle 1984; Schwartz et al. 1986; Soule 1986; and Chepko-Sade & Halpin 1987) both community and population level (e.g., Ralls et al. 1986; Allendorf & Leary 1986) theory have been applied to current conservation problems. The former has been concerned with species diversity and the latter with the long-term integrity of gene pools. Two primary approaches are used to maintain adequate gene pools in fragmented situations: (1) periodic induced migration (Frankel 1983); and (2) maintaining or creating corridors to connect fragments (Schonewald-Cox 1983; Simberloff & Cox 1987; Noss 1987). This paper addresses the long-term maintenance of genetically viable populations of desert-dwelling mountain sheep (Ovis canadensis ssp.) via the latter approach. In addition, we discuss the related topic of protecting islands of habitat that do not support permanent populations but may be used occasionally, serving as important "stepping stones" in migration corridors.

Philopatry in Desert-dwelling Mountain Sheep

Mountain sheep, in general, are closely associated with steep, mountainous, open terrain (Geist 1971), which results in naturally disjunct demes. This habitat preference reflects two basic adaptations of mountain sheep relative to predation (1) great agility on rocks; and (2) keen vision to detect predators at sufficient distances to make escape probable.

Following the early decimation of mountain sheep in North America, it became evident that this species was inherently slow to recolonize vacant habitat. Consequently, reintroductions became an important management technique, dating back as far as the 1930s. Geist (1967, 1971) was the first to propose a general theory on the conservative colonization behavior of mountain sheep. The result has been an emphasis on conservation of mountainous habitats for wild sheep, with little concern for intermountain areas. For example, the 21 specific plans to conserve habitat for desert-dwelling mountain sheep called for in the California Desert Conservation Area Plan (Bureau of Land Management 1990:55–56) are restricted to specific mountainous areas totaling only 4,800 km². It is not our purpose to criticize these attempts to protect and enhance habitat; instead, we cite that document as an example of "traditional" thinking with respect to the protection of "traditional" habitat.

In addition to the behavioral conservatism of mountain sheep that Geist (1971) emphasized relative to dispersal, he documented some interpopulation movements, mostly by rams, in which they crossed "nontraditional" sheep habitat. Desert ecosystems differ markedly from the northern systems studied by Geist (1971), in that the relatively flat terrain separating "traditional" habitat islands lacks dense vegetation. Such terrain should represent less of a barrier to dispersal than the forests of more northern ecosystems. Additionally, many desert mountain ranges lack large carnivores such as mountain lions (Felis concolor) and wolves (Canis lupus), which may be more common in intermountain habitats of the north. Consequently, one might expect less conservative dispersal behavior of mountain sheep in desert ecosystems compared with northern systems.

Early researchers (e.g., Russo 1956) were aware of intermountain movements by desert-dwelling mountain sheep. Recent technology has resulted in a vastly expanded knowledge of patterns of habitat utilization by these animals. In Arizona, occasional intermountain movements by ewes were documented, in addition to extensive intermountain movements by rams (Witham & Smith 1970; Cochran & Smith 1983; Ough & deVos 1984; Krausman & Leopold 1986). In Nevada, McQuiver (1979a) noted the presence of rams and ewes in ranges not known to have resident populations. Similarly, Flensowitz (1987) and King & Workman (1983) documented movements of mountain sheep across highways, fences, and intermountain flats in New Mexico and Utah, respectively. Extensive ongoing telemetry studies in the Mojave Desert of California also confirm...
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intermountain movement by both rams and ewes (Bergebach 1987; V. C. Bleich, A. M. Pauli, R. L. Vernoy, J. D. Wehausen, unpublished data).

Wilson et al. (1990) noted that, "all areas utilized by desert big horn are essential to their continued survival." This has become an increasingly common concept in recent years, as more and more investigators have considered the role of habitats separating desert mountain ranges (e.g., Ough & DeVos 1984; Cooperides 1985; Krausman & Leopold 1986; Schwartz et al. 1986). These authors also considered the importance of small populations and began to incorporate concepts of population genetics relative to questions of wild sheep management.

Genetic Considerations

The concern about genetic health of desert-dwelling mountain sheep arose from (1) a popular (Seton 1929; Buechner 1960; DeForge et al. 1979), but probably greatly exaggerated (Welles 1962; V. C. Bleich and S.A. Holl, unpublished data) assumption that mountain sheep in general have declined to approximately 2% of their historical population level in North America; (2) their relatively isolated natural habitat, the rugged peaks of desert mountain ranges (Hansen 1980); (3) their polygynous mating system (Geist 1971); and (4) the assumption that cultural features developed in the last century prevent dispersal across the relatively flat ground between desert mountains ranges (Bailey 1980). Geist (1975) raised the general question of genetic effects on mountain sheep populations when interpopulation movements could no longer occur.

Schwartz et al. (1986) looked at this question through applying population genetics theory to a "metapopulation" of mountain sheep in the Mojave Desert of California and Nevada that was bounded by two major fenced highways and the Colorado River, and included about 1,600 sheep distributed in 15 subpopulations (densities). Their analyses suggested that relatively low levels of gene migration were necessary to prevent loss of genetic diversity in small populations. While migration of genes is difficult to document, the increasing evidence of intermountain movement by rams in the breeding season suggests that the low levels of gene migration considered necessary probably are met. Their study area would satisfy the requirements for a preserve of a size consistent with (1) the long-term genetic health of populations, (2) the possibility of establishing additional subpopulations, and (4) the possibility of continued divergence and long-term evolution (level 7 or 8 preserve; Schonewald-Cox 1983). Also, mounting evidence (Festa-Bianchet 1986; Geist 1971; J.D. Wehausen, V.C. Bleich, A.M. Pauli, and R.L. Vernoy, unpublished data) indicates substructuring within traditionally defined populations that would minimize inbreeding. Many populations appear to consist of a number of distinct but overlapping female home ranges. Although female offspring generally appear to adopt the home range of their mothers, mature males appear to spend the rut outside of their maternal home range.

Both dispersal and social structure potentially are important determinants of effective population size (Claypo-Sude et al. 1987). Dispersal, coupled with substructuring of populations, probably acts to maintain genetic variation within populations of mountain sheep. Maintaining such variation presumably is important in preserving the evolutionary potential of metapopulations and, as such, should be of concern to managers.

Ecological Considerations

In addition to corridors necessary to facilitate gene flow, the ecological value of mountainous habitats not permanently occupied should be recognized. Recent work in California has documented further the use of areas not traditionally considered to be mountain sheep habitat. For example, Cowhorn Mountain, located approximately 5 km across a broad, sandy area west of Old Dad Peak, has been found to be a lambing area for the Old Dad Peak population and is used at other times of the year by different cohorts of the population as well. Similarly, in 1987 two tlemetered ewes from the Old Woman Mountains visited the neighboring Iron Mountains in winter and the Ship Mountains in spring. One of these bore a lamb in the Iron Mountains and returned to the Old Woman Mountains three months later. Her disappearance from the Old Woman Mountains in the winter of 1986 suggests that this may be a regular pattern. This view is supported by a native of Milling (personal communication 1987), a town at the southern tip of the Old Woman Mountains, who reported regularly seeing sheep tracks crossing between the Old Woman and Iron mountains in winter and spring. Both the Ship and Iron mountains are separated from the Old Woman Mountains by 6-8 km of desert flats and blow sand. The potential ecological importance of these and similar areas should not be underestimated. The sheep population in the Old Woman Mountains has been depressed during the 1980s, possibly because of a high prevalence of cattle diseases (Clark et al. 1985; Wehausen 1988). The observed intermountain movements by ewes may be remnants of movements that formerly occurred on a larger scale and that could be in danger of being lost as a regular pattern. No land management plan even considers the potential importance of the Ship and Iron mountains to the Old Woman Mountains population. Although the Iron Mountains have been identified as

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a potential reintroduction site (see below), such action has been delayed by the potential that animals moving from the Old Woman Mountains will transmit disease to the Iron Mountains. Dobson and May (1986) have cautioned against such scenarios. Indeed, intermountain movements are not only a "casual" event (necessary for gene flow, but potentially deleterious due to disease transmission (Shuterbiff & Cox 1987). Such movements may have been a major factor in the current widespread distribution of paramyel-
novirus in desert populations of mountain sheep (Clark et al. 1985; We- 
hausen et al. 1987).

Conclusions

The notion that the habitat of desert-dwelling mountain sheep is restricted to those mountain masses that provide food, cover, and water and that support permanent populations of the species is no longer adequate. Although habitat within mountain ranges can be enhanced (e.g., Bleich et al. 1982a, 1982b; Werner 1985), such activities must be conducted with the awareness that all areas used by mountain sheep may be essential for their long-term survival. For viable populations of mountain sheep to persist, more than "mountain islands within desert seas" must be protected. Although natural forces such as precipitation may drive the dynamics of populations within these "islands" (Monson 1966; Bleich 1986; Douglas & Leslie 1986; Wehausen et al. 1987), and disjunct populations may simultaneously experience "boom" or "bust" phenomena, the actions of humans will determine the ultimate fate of this species.

Wilcox and Murphy (1985) concluded that the risk of fragmentation is threefold (1) demographic units may be destroyed outright, reduced in size, or subdivided; (2) potential sources of emigrants may be lost; and (3) immigration may be impeded by conversion of natural habitat. All of these are applicable to the conservation of mountain sheep in desert ecosystems. Nonetheless, it is important to recognize that a naturally fragmented distribution, as found among populations of desert-dwelling mountain sheep, can minimize the probability of extinction where catastrophic population losses are a factor (Quinn & Hastings 1987). This is the fundamental concept underlying the Recovery and Conservation Plan for mountain sheep in the Sierra Nevada of California (Sierra Bighorn Interagency Advisory Group 1984). The history of mountain sheep is replete with examples of decimation and extinction of local populations due to diseases, mostly contracted from domestic livestock (Buechner 1966; Robison et al. 1967; Stelfox 1971; Sandovol 1980; Foreyt & Jessup 1982; Goodson 1982; Onderka & Wishart 1984; Jessup 1985). Although such demographic impacts may far outweigh long-term genetic considerations from a conservation standpoint (Lande 1988), migration between disjunct subpopulations remains critically important, not only for genetic reasons, but also for natural recolonization of habitat that may become vacant. Berger (1990) has recently demonstrated the high probability of extinctions of small populations of mountain sheep in this century, if even a fraction of these extinctions would have occurred in the absence of influences related to the white man, natural extinction and recolonization may be considerably more common than previously thought.

To ensure the long-term conservation of these animals in a wild state, future management strategies for mountain sheep in the desert must take more factors into account in a larger-scale approach. Management documents should begin to seriously consider intermountain travel corridors for sheep, taking steps to minimize potential barriers rather than range fences and motorized recreational activities. Managers should also recognize that if domestic livestock graze along such corridors, diseases may be transmitted to mountain sheep populations via migrating animals. Domestic sheep are particularly dangerous in this regard because they carry fatal respiratory bacterial strains (Onderka & Wishart 1988; Onderka et al. 1988; Foreyt 1989). Small, isolated tracts of "traditional" habitat that is not permanently occupied should be recognized as potential seasonal habitat and as "stepping stones" within migration corridors. Translocation programs should give priority to reestablishing populations on ranges that will decrease interdemic distances so as to facilitate gene migration.

The Bureau of Land Management recently prepared a management plan for mountain sheep on all applicable desert ranges in the southwestern United States. The plan incorporates the concept of metapopulations (MM 1988). It sets as its goal the recovery of 115 "populations" to "viable" status (>100 sheep). However, there remains a need to map all potential metapopulations of mountain sheep as well as known and potential intermountain corridors throughout their desert range, and to develop conservation strategies on that geographic scale.

Figure 1 is an example of a metapopulation from southeastern California. It is bounded on the north, south, and west by major, fenced interstate highways, and on the east by the Colorado River. Relatively few unfenced, paved roads exist within this metapopulation; thus, with the exception of the Twenty-Nine Palms and Lucern Valley areas, and an aqueduct partially separating the Coxcomb Mountains from the Granite/Palen and southern iron mountains to the east and the Turtle Mountains from the unoccupied ranges to the south, there are few physical obstacles to intermountain movements by mountain sheep. Approximately 1,000 mountain sheep permanently inhabit 15 of 31 mountain ranges in this region. Two of the 15 inhabited ranges
Figure 1. Map of a metapopulation of mountain sheep in southeastern California. Stippled mountain ranges currently have resident populations of the approximate size listed. Mountain ranges with N = 0 are extirpated populations; ranges with no N value listed are not known ever to have had resident populations. Arrows indicate documented intermountain movements by mountain sheep.

have been reestablished by translocation (Whipple and Sheep hole). Only 8 of the 15 ranges support populations of 50 or more sheep. We have documented movements of mountain sheep between 11 pairs of mountain ranges depicted in Figure 1; the mean distance between those ranges is about 8 km (range = 6-20).

From the standpoint of fragmentation, the population in the Newberry Mountains in the NW corner of Figure 1 is particularly isolated. In fact, as recently as 1982 this population was not known to exist (Weaver 1982). Reestablishing populations along the link between the Rodman and Bullion mountains should be a high priority within this metapopulation. The entire Bullion and Lava Bed Mountains, however, are within the Twenty-Nine Palms Marine Corps Training Center. The Department of Defense is currently pursuing a reintroduction of mountain sheep in the Bullion Mountains in cooperation with the California Department of Fish and Game.

Geographically, the second most notable fragmentation within this metapopulation is the separation of the three populations in the SW corner from the others. This constitutes a much less serious situation than the Newberry Mountains in that the combined population in this area totals about 275 sheep (Fig. 1). Nevertheless, reestablishing a population in the Pinto Mountains would facilitate migration between these three populations and the remainder of the metapopulation.

Within the eastern portion of this metapopulation, reestablishing a population in the Iron Mountains would provide an important connection between the Sheep hole/Eagle/Coxcomb/Granite-Palen mountains complex and the occupied ranges to the NE. Given that the former complex contains only about 100 total sheep, reestablishing a population in the Iron Mountains should have priority over such an effort in the Pinto Mountains. The aforementioned disease question, however, will play an important role in the decision to reestablish a permanent population in the Iron Mountains.

Of the ranges not known previously to have had resident mountain sheep populations, the Stepladder Mountains are particularly important as a central "stepping stone" potentially connecting four surrounding...
populations. The Piute, Little Piute, Ship, and Calumet mountains are only somewhat less central, and three of these are known to have been visited by sheep from adjacent ranges. Similarly, the Lava Bed Mountains have the potential to serve as an important link between the Boltun and Bodine mountains, if populations become established there.

Our discussion has centered around the importance to mountain sheep of unimpeded movement. A similar concern can be extended to other terrestrial species whose primary habitat naturally occurs in disjunct patches but that require expanses of less desirable habitat between such patches to some extent. Both mule deer (Odocoileus hemionus columbianus, O. b. crooki) and mountain lions, where they occur in deserts, probably fit these criteria. Previous discussions of natural corridors (Sunderlof & Cox 1987; Noss 1987) have referred to maintaining or creating corridors of habitats similar to those being connected. The situation considered here differs somewhat in that the disjunct nature of primary habitat patches is natural and the corridor habitat is clearly less desirable to the species involved but is nonetheless used in moving between suitable patches.

Schwartz et al. (1986) concluded, "In general, desert-dwelling mountain sheep populations are sufficiently abundant and juxtaposed, and areas of habitat are still sufficiently large to allow the continued existence of this species throughout much of its historic range." We still have the raw materials; what is needed is a commitment to protect and manage them properly. Only with the recognition that stewardship responsibilities extend beyond areas of "traditional" habitat and what are perceived to be "viable" populations will we assure the long-term stability of desert-dwelling mountain sheep and other vagile species that similarly inhabit naturally fragmented habitat.

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Bleich et al.


A framework for understanding noise impacts on wildlife: an urgent conservation priority

Clinton D Francis1 and Jesse R Barber1

Anthropogenic noise is an important environmental stressor that is rapidly gaining attention among biologists, resource managers, and policy-makers. Here we review a substantial literature detailing the impacts of noise on wildlife and provide a conceptual framework to guide future research. We discuss how several likely impacts of noise exposure have yet to be rigorously studied and outline how behavioral responses to noise are linked to the nature of the noise stimulus. Chronic and frequent noise interferes with animals’ abilities to detect important sounds, whereas intermittent and unpredictable noise is often perceived as a threat. Importantly, these effects can lead to fitness costs, either directly or indirectly. Future research should consider the range of behavioral and physiological responses to this burgeoning pollutant and pair measured responses with metrics that appropriately characterize noise stimuli. This will provide a greater understanding of the mechanisms that govern wildlife responses to noise and help in identifying practical noise limits to inform policy and regulation.


An emerging aim in applied ecology and conservation biology is to understand how human-generated noise affects taxonomically diverse organisms in both marine (e.g., Slabbekoorn et al. 2010; Ellison et al. 2012) and terrestrial (e.g., Patriacelli and Blickley 2008; Barber et al. 2010; King and Swaddle 2011) environments. Noise is a spatially extensive pollutant and there is growing evidence to suggest that it may have highly detrimental impacts on natural communities yet efforts to address this issue of emerging conservation concern lack a common framework for understanding the ecological consequences of noise. A conceptual scaffold is critical to scientific progress and to its ability to inform conservation policy. As more attention and resources are invested in understanding the full ecological effects of noise, it is important that investigators design research questions and protocols in light of the many possible costs associated with noise exposure and also that they properly link responses to several relevant features of noise, such as intensity, frequency, or timing, that could explain wildlife responses (Panel 1).

Here we introduce a framework using a mechanistic approach for how noise exposure can impact fitness at the level of the individual organism as a result of changes in behavior, and identify several acoustic characteristics that are relevant to noise exposure and ecological integrity. We provide representative examples of noise impacts, primarily from terrestrial systems; however, these issues are equally applicable to organisms in aquatic environments. We stress that various responses to noise exposure are less obvious than those that have typically been studied to date, such as signal modifications (e.g., changes in vocal frequency, amplitude, or vocalization timing) and decreases in site occupancy (e.g., Payne et al. 2008; Francis et al. 2011b). Importantly, probable behavioral responses to noise that merit further scientific study might be detrimental to individual fitness and may have severe population-level consequences. As we show below, the presence of a species in a noisy area cannot be interpreted as an indication that it is not being impacted by elevated sound levels, because there are many potential costs associated with noise exposure that have not been rigorously studied.

Variation in responses to the same noise stimulus

Species differ in their sensitivities to noise exposure (Payne et al. 2008; Francis et al. 2009, 2011a); however,
A framework for understanding noise impacts on wildlife: an urgent conservation priority

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In a nutshell:

- Noise is an intense, widespread pollutant, relevant to conservation efforts worldwide.
- Using the number of animals present in environments exposed to anthropogenic noise as the sole metric of noise impacts can be deceiving because there are many hidden costs of noise exposure (eg compromising predation, deterrence of mating signals, altering emergent or movement patterns, increasing physiological stress).
- To ensure that conservation initiatives (and efforts to establish regulatory limits) are relevant, investigators must properly characterize a suite of noise features.
- Reducing noise exposure and incorporating sound measurement into environmental planning will quickly benefit ecological systems.

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Variation in responses to the same noise stimulus

Species differ in their sensitivities to noise exposure (Bayne et al. 2008; Francis et al. 2009, 2011a); however,
Impacts in terms of pairing success, number of offspring, physiological stress, or other measures of fitness (Figure 1). Because the various responses may range from linear to threshold functions of noise exposure, investigators should take an integrative approach that incorporates several different metrics (eg density, pairing success, number of offspring), rather than using a single metric to describe how noise influences their study organism. But which alterations in behavior are most likely to occur and which are the most detrimental? These are important questions because funding and logistical constraints ensure that measuring all of the potential impacts of noise is impossible. Fortunately, the nature of sound stimuli can guide investigators toward likely behavioral changes that may influence fitness.

Figure 1. Responses to the same noise stimulus can take a variety of shapes. (a) The sound pressure level (SPL) of noise (red) decreases with increasing distance from the source but may not reach “baseline” ambient levels until ~1 km away (this distance will vary depending on noise source and the environment). Response curves for species occupancy (blue solid line) and pairing rates (blue dashed line) in response to noise may have unique shapes as might other measures of species responses to noise stimuli. The relationship between SPL and distance is from Francis et al. (2011c) and Francis (unpublished data) with noise generated from gas well compressors. Behavioral responses are hypothetical but based on responses in Francis et al. (2011c). (b) Spatial propagation of elevated noise levels from a point source (such as a single car or an oil rig compressor station), which decays as a spreading loss of 6 dB or more per doubling of distance, due to the geometry of the spherical wavefront. It is important to note that line sources (such as a busy highway; not shown) lose only 3 dB per doubling of distance due to their cylindrical wavefront. Clearly, knowledge of the geometry of anthropogenic noise stimuli is essential to understanding the scale of exposure (c and d) Spatial representation of (c) species occupancy and (d) pairing success surrounding a point source of noise.

The degree to which individuals vary in sensitivity to noise during such life-history stage or due to behavioral context has been underappreciated. For example, ovenbird (Seiurus aurocapilla) habitat occupancy appears un influenced by noise exposure (Habib et al. 2007; Bayne et al. 2008; Goodwin and Shriver 2011), yet males defending noisy territories are less successful in attracting mates (Habib et al. 2007). Reed buntings (Emberiza schoeniclus) also show reduced pairing success in noisy areas (Grose et al. 2010). Such examples should serve as a warning to biologists, land managers, and policy makers: the same noise stimulus can affect various response metrics in different ways. An organism might show little to no response to noise in terms of habitat occupancy or foraging rate, for example, but may experience strong negative
that limited stimulus processing capacity could be responsible for some detrimental effects. Noise stimuli of various kinds might act as a distraction, drawing the animal’s attention to a sound source and thereby impairing its ability to process information perceived through other sensory modalities (Chen et al. 2010). Alternatively, noise may reduce auditory awareness, trigger increased visual surveillance, and compromise visually mediated tasks. The mechanistic details and ecological importance of such disturbances still need to be fully explored. Regardless, the conservation implications of understanding the importance of noise as a distractor are not trivial; if distraction is a fundamental route for noise impacts, our concern might spread beyond those frequencies that overlap with biologically relevant signals.

- **Behavioral changes**

Although a limited number of laboratory studies have suggested that noise may affect gene expression, physiological stress, and immune function directly (Figure 3a; Kight and Swaddle 2011), most noise-related impacts appear to involve behavioral responses across four categories (1) changes in temporal patterns, (2) alterations in spatial distributions or movements, (3) decreases in foraging or provisioning efficiency coupled with increased vigilance and anti-predator behavior, and (4) changes in mate attraction and territorial defense (Figure 3b). As demonstrated below, these disturbance-, distraction-, and masking-mediated behavioral changes could directly impact individual survival and fitness or lead to physiological stress that may then compromise fitness.

- **Changes in temporal patterns**

Sound stimuli that are perceived as threats can alter temporal patterns; for example, red foxes (Vulpes vulpes) cross busy roads when traffic rates are lower, suggesting noise exposure might be affecting the timing of their movements (Figure 3b; Baker et al. 2007). Similarly, noise from heavy traffic disrupts the timing of foraging by West Indian manatees (Trichechus manatus), potentially influencing foraging efficiency and energy budgets (Figure 3b; Mitoski-Olds et al. 2007). Noise can also change behavior due to interference with cue detection. European robins (Erithacus rubecula) avoid acoustic interference from urban noise by singing at night, when noise levels are lower than during daylight hours (Figure 3b; Fuller et al. 2007). Although this example appears to be an example of a natural response to noise, it is possible that this behavior is a learned response to noise. Further studies are needed to determine the extent to which noise exposure can affect behavior and ecological interactions.

### Panel 1. Sound features relevant to noise-impact studies

In the next text, we discuss how the spectral (frequency) composition of noise is related to an organism's hearing range and its ability to detect relevant sounds. For these reasons, it is critical that researchers collect sound-level data with an appropriate frequency-weighting filter. For instance, the 'A' filter on many sound-level meters is based on equal loudness contours for human hearing; this filter provides a conservative estimate of bird hearing and is the best readily-available weighting for bird studies (Dooling and Pepper 2007). However, whether working with birds or other taxa, it is best to simultaneously record and measure the noise using a 'fast' frequency filter to truncate the resulting spectral output to the most relevant frequency range for each species of interest (see below).

Investigators should also avoid the temptation to characterize a noise stimulus as a single decibel value, whether weighted or not, as other metrics that describe the noise are equally important. Time-averaged values, such as equivalent continuous sound level (L_{eq}), can be extremely informative to describe sounds that are chronic or frequent, whereas these integration times do not necessarily characterize sounds that occur once in a while or more randomly. Instead, measurements integrated over several hours will mischaracterize short, abrupt sounds that could be viewed as disturbances, such as noise events created by infrasonic and low-frequency jet overflights that alter the behavior and time budgets of marine mammals (Figure 1c; Goodwin 2006). For disturbance sounds, exposure metrics that capture each sound event’s maximum power (L_{max}, Figure 1c) and the rate at which power rises from the lowest detectable level to its maximum (e.g., rate of rise, Figure 2) are critical. L_{eq} values are often reported without stating the frequency weighting (in these cases, A-weighting — a human-centric curve) assumed, which may be inappropriate for many animals (Figure 1b). In contrast, quantification of chronic noise can best be served with time-averaged values such as L_{eq} (WebFigure 1b). L_{eq} is typically calculated over 24 hours; however, many studies fail to report what time period L_{eq} values were integrated and a 24-hr integration is assumed, which may not be appropriate for many ecological questions. For example, for a species that is sensitive to traffic noise, such as the white-breasted nuthatch (Sitta carolinensis) (Goodwin and Shriver 2011), it may be best to truncate the time integral to the hours of biological interest, such as during dawn chorus. Limiting frequency analysis to the hearing or vocal range of the target species or community may also be beneficial (e.g., Falsey et al. 2016). Future studies should aim to use biologically relevant integration times and report these details.

Best practices will include simultaneous acquisition of high-quality audio recordings along with multiple sound-level measurements to offer unconstrained opportunities to investigate alternative spectral filtering, time integration, and additional measurements, such as order statistics indicating the percentage of time above a certain decibel level or metrics reflective of the sound event’s predictability (Figure 2a). Carefully considering how these temporal, intensity, and frequency features (Figure 2a) interact will help investigators identify where along the disturbance-interruption continuum (Figure 2a) the stimulus is most likely to fail and will help identify the most likely behavioral responses (Figure 3).

Above all, to maximize interpretability of results, facilitate comparisons among studies, and provide meaningful data for conservation measures, it is critical to explicitly report the acoustic metrics used in each study to describe species responses. Additional sound metric and terminology details can be found in Barber et al. (2014) and Patz et al. (2009).
Understanding noise impacts on wildlife

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Figure 2. (a) The disturbance-interference continuum can range from acute or infrequent noise stimuli that will likely trigger startle or hide responses to chronic or constant noise that interferes with cue detection. (b) The severity of an impact from a noise stimulus will depend on the temporal, intensity, and frequency features of the stimulus.

important behavioral adaptation that permits this species to overcome unfavorable acoustic conditions, the consequences of shifting the timing of song delivery are unknown. The effects of signal timing on mate attraction or territorial defense may be just as important to fitness as other signal features (eg frequency, syntax). Changes in the timing of song delivery of less than one hour can break down signaler-receiver coordination so that conspecific males do not recognize species-specific signals (Luther 2008). If signaler-receiver coordination is disrupted between singing males and responsive females, the behavioral flexibility that permits shifts in signal timing in response to noise may possibly be maladaptive.

Sleep is an important factor and follows a strong circadian profile. Although a substantial body of research has investigated the impact of noise on sleep in humans, scant information is available regarding its effects in other animals (reviewed in Kight and Swaddle 2011). Understanding the importance of sleep disruption on overall fitness is critical as we might expect detrimental influences even for species not typically described as dependent upon hearing (eg visually oriented predators such as raptors).

Alterations in spatial distributions or movements

Among the most obvious responses to noise are site abandonment and decreases in spatial abundance. These metrics may also be easiest and least costly to quantify, which perhaps explains why there are many such examples in the literature (eg Bayne et al. 2008; Eganbrok et al. 2008; Francis et al. 2009). However, noise itself can affect an investigator’s ability to measure responses to noise. For example, increases in continuous noise of 5–10 decibels (dB, A-weighted) above baseline can reduce bird numbers during standard bird surveys by one-half, greatly biasing measures of site occupancy and abundance (Ortega and Francis 2012). If not carefully considered, this detection problem could bias subsequent interpretations and management efforts.

Despite the known effects of noise on population sizes, there is still considerable evidence to suggest that animals may abandon areas when frequent or chronic noise stimuli interfere with cue detection or when more variable sounds are perceived as threats (Bayne et al. 2008; Goodwin and Shriver 2011; Blickley et al. 2012a). Birds with low-frequency vocalizations experience more acoustic interference from chronic low-frequency anthropogenic noise and therefore exhibit stronger negative responses to noise in their habitat than birds with high-frequency vocalizations that experience less acoustic interference (Figure 3; Francis et al. 2011a). These masking effects can be spatially extensive, potentially impairing communication at distances ranging from 0.5 to 1.0 km or farther from the noise source (Blickley and Patricelli 2012). Furthermore, changes in spatial distributions due to noise’s effect on cue detection are not restricted to interspecific communication; for instance, greater mouse-eared bats (Myotis myotis), which locate terrestrial prey based on sounds they generate when walking, also avoid hunting in noisy areas (Figure 3; Schaub et al. 2008). In addition to disrupting cue detection at the intra- and interspecific level, ambient noise may also interfere with cue detection used for movement at larger spatial scales. Some frog species use conspecific calls to locate appropriate breeding habitat, while some nest species use heterospecific calls for the same purpose (reviewed in Slabbekoorn and Bouton 2008). Whether noise exposure impedes animals from using such acoustic beacons to locate critical resources (eg water, food, habitat) is unknown and should be a focus of future research.

Site abandonment or decreases in population numbers can also occur in response to unpredictable, rare, or sudden sounds, which are perceived as threats (Figure 3d). For example, greater sage grouse (Centrocercus urophasianus) lek attendance declines at a higher rate in response to experimentally introduced intermittent road noise than to continuous noise (Blickley et al. 2012a), suggesting that sage grouse site occupancy may depend more on perceived risk than on masking of acoustic cues. Nevertheless, masking of communication may have other consequences (Figure 1).

Species undoubtedly differ in their sensitivities to disruptive sounds, but individuals within a population also show such differences (Bejder et al. 2006). Individuals can
Figure 3. Conceptual framework for understanding how noise stimuli – perceived as a threat or interfering with cue detection (the disturbance-interference continuum) – can elicit behavioral responses that have direct consequences for fitness or via a physiological stress response, which can also feed back to behavioral changes. Startle/flee responses are more likely to occur in response to noise stimuli that are perceived as a threat (acute, erratic, or sudden sounds). Problems arising from a failure to detect cues are more likely to occur when noise stimuli are chronic and overlap with biologically relevant cues used for communication, orientation, and predator/prey detection. Problems arising from distraction may occur as a result of sounds with features ranging from those that interfere with cue detection to those that are perceived as threats. Lowercase letters indicate studies (listed on the right) providing evidence for the link made for each arrow. Dashed arrows signify a link that we predict as important but for which no current evidence exists. The matrix denotes that which could result from a change in behavior or a failure to change behavior in response to noise.

Vary greatly in their behavioral responses to stimuli, which may explain the variations in their ability to cope with environmental change (Siri et al. 2005). The redistribution of sensitive and tolerant individuals across the landscape may not appear to be a problem. However, in the case of social animals, where group living provides protection from predation, the loss of sensitive individuals from the group through site abandonment could increase predation risk for the group as a whole through the removal of the most vigilant group members. These sensitive individuals, who are now isolated from the group, lose the benefit of safety in numbers. Depending on population structure and the scale at which these individuals are displaced by noise, genetic diversity may be reduced because traits that govern risk-averse (physiologically) and risk-prone (bold) behaviors can be heritable (Dingemans and et al. 2002).

Site abandonment and changes in abundance provide only a limited understanding of how noise can impact wildlife populations and communities. Importantly, abundance can also be misleading because areas where individuals are abundant do not always translate into high fitness for those individuals (e.g., Johnson and Temple 1988). Using such evidence to conclude that noise has no impact is problematic; individuals may not have alternative areas to occupy or other responses (survival, mating success, reproductive output) may be negatively affected by noise even when abundance is high (Figure 1a). These possibilities are especially likely when a noise stimulus is new and demographic processes
have not had time to impact population size or when the population in an area that is exposed to noise is supplemented by individuals from elsewhere (i.e. source-sink dynamics).

**Decreases in foraging or provisioning efficiency and increased vigilance and anti-predator behavior**

Noise can impair foraging and provisioning rates directly (Figure 3, g and h) or indirectly as a consequence of increased vigilance and anti-predator behavior (Figure 3, i–k, o). When noise is perceived as a threat, an organism may miss foraging opportunities ("missed opportunity cost"; Brown 1999) while hiding or as a result of maintaining increased vigilance (Figure 3k; Gavin and Komnen 2006). Missed opportunities can also occur when noise interferes with cue detection. For instance, nesting tree swallows (Tachycineta bicolor) exposed to noise beg less in response to recorded playbacks of parents arriving at nests (eg calls, movement, sounds) than nestlings in quiet conditions, presumably because the ambient noise masks parent-arrival sounds (Figure 3g; Leonard and Horn 2012). Unfortunately, this study did not determine whether missed provisioning opportunities translated into costs, such as reduced nestling mass or fledging success.

Noise that interferes with cue detection can also hamper predators' hunting abilities. For example, among greater mouse-eared bats, search time for prey was shown to increase and hunting success to decrease with exposure to experimental traffic noise (Figure 3j; Sonens and Schaub 2011). This decrease in foraging success may explain why some predators avoid noisy areas (Figure 3i; eg Schaub et al. 2008; Francis et al. 2009). Noise also impairs foraging in three-spined sticklebacks (Gasterosteus aculeatus), resulting in more unsuccessful hunting attempts (Pusser and Radford 2011). Noise also possibly interacts with the ability of prey species to hear approaching predators, which could impact fitness directly. Although likely, elevated predation risk due to noise has not yet to be demonstrated, but some evidence does suggest that animals exposed to noise behave as though they are at greater risk of predation. For example, in the chaffinch (Fringilla cedulis), continuous noise impairs auditory surveillance, triggering increased visual surveillance, as a result of which the birds spend less time foraging (Figure 3i; Quinn et al. 2006). Noise that serves as a distraction may also lead to an increased latency in predator-escape response (Figure 3i; Chan et al. 2010), potentially compromising survival. Both distraction and elevated vigilance could also cause a decrease in foraging rates and success (i.e. a trade-off; Figure 3j; Gavin and Komnen 2006; Quinn et al. 2006). Collectively, these studies suggest that both interference noise and noise perceived as a threat decrease the rate and frequency at which organisms obtain food. Studies aimed at understanding the extent to which these behavioral shifts represent a metabolic expense (relevant to survival and reproductive success) will help to reveal the hidden costs of noise exposure.

**Changes in mate attraction and territorial defense**

The most direct way in which noise may alter an individual's ability to attract mates or defend its territory is through energetic masking, in which potential receivers are simply unable to hear another individual's acoustic signals through noise that is frequent or continuous during important temporal signaling windows. Changes made to acoustic signals appear to be an adaptive behavioral adjustment that permits individuals to communicate under noisy conditions (eg Fuller et al. 2007; Gross et al. 2010; Francis et al. 2011b), yet these shifts could also incur a cost. In noisy areas, female great tits (Parus major) more readily detect male songs sung at higher frequencies than females typically prefer (Hallwerek et al. 2011a). However, males who sing predominately at higher frequencies experience higher rates of cuckoldry (Figure 3l). Great tit breeding in noisy areas also have smaller clutches and fewer fledglings (Halwerek et al. 2011b); similarly, eastern bluebirds (Sialia sialis) experience decreased productivity when nesting in areas with elevated noise levels (Kight et al. 2012). Paired with patterns of decreased pairing success in noisy areas (Habib et al. 2007; Gross et al. 2010), these studies suggest that short-term signal adjustments in response to anthropogenic noise might function as evolutionary traps (eg Schiepek et al. 2002) in which behavioral responses to novel acoustic stimuli could be maladaptive. That is, behavioral shifts to be heard in noisy areas may come with the cost of compromising the attractiveness of the signal to potential mates. This possibility remains to be tested against other potential explanations for declines in pairing or reproductive success, but emphasizes why investigators should measure aspects of fitness in noise-impact studies rather than simply documenting changes in site occupancy or abundance.

Finally, although the list of species known to shift their signals in response to noise is growing, there is at least one frog species and some bird species that do not alter their vocalizations in response to noise (eg Hu and Cardoso 2010; Love and Bee 2010; Francis et al. 2011b). More work is needed to provide a thorough understanding of the phylogenetic distribution of noise-dependent vocal change and researchers should strive to publish negative results, as knowledge of the apparent absence of these behavioral modifications is just as important as knowledge of their presence.

**Linking behavioral changes, physiological responses, and fitness costs.**

The behavioral changes mentioned above can have direct consequences for fitness (Figure 3r), such as reduced pairing success (Habib et al. 2007) or reduced
reproductive success (Halfwerk et al. 2011b). However, behavior can influence, and be influenced by, physiological responses (Figure 3p; Kight and Swaddle 2011), which in turn can affect fitness (Figure 3q; Bonier et al. 2008). Kight and Swaddle (2011) reviewed many links between noise, physiological stress, and behavioral change, so we only briefly mention them here.

It is well known that increased physiological stress affects fitness (Figure 3q); yet, to our knowledge, a direct link between increased physiological stress due to noise and decreased survival or reproductive success has not been shown in wild animals. The best evidence for this potential link comes from two studies. In one, Blickley et al. (2012b) found that greater sage grouse on leks exposed to experimental playback of continuous natural gas drilling noise or intermittent road noise had higher fecal glucocorticoid metabolites (GCs) than individuals on control leks. The authors suggested that marking of cuss likely resulted in elevated stress levels, inhibiting social interactions or leading to a heightened perception of predation risk. In the other, Hayward et al. (2011) showed that experimental exposure to motorcycle traffic and motorcycle noise increased GCs in northern spotted owls (Strix occidentalis caurina). In an observational component of the same study, spotted owls nesting in areas with higher levels of traffic noise fledged fewer offspring, even though they did not have elevated GCs, suggesting that the effects of road noise may have been offset by greater prey availability in noisy areas. These two studies demonstrate that noise may lead to decreased fitness in sage grouse and spotted owls, and also clearly indicate that more research is needed to determine how noise exposure, physiological stress, and fitness are linked in wild populations.

**Scanning up behavioral responses**

Here, we have focused on effects of noise exposure at the level of the individual; however, studies that integrate individual behavior, population responses among multiple species, and species interactions are critical to understanding the cumulative, community-level consequences of noise. Measures of species richness are a good starting point, but may be misleading because species may respond negatively, positively, or not at all to sound stimuli (Payne et al. 2008; Francis et al. 2009), individuals within a single species may respond differently to the same stimulus (Sih et al. 2004), and individuals that remain in noisy areas may suffer from one or more of the fitness costs discussed above. This variation within and among species in response to noise guarantees that communities in noisy areas will not always be subsets of the species that make up communities in comparable quiet areas. Researchers should couple standard measures of richness and alpha (local) diversity with beta-diversity metrics that reflect variation in the composition of species within communities and among sites. Nevertheless, additional investigations will be needed to understand why species respond to sound stimuli as they do. Settlement patterns may not hinge on the intensity of noise, but are perhaps due to the presence or absence of cues indicating the presence of predators and heterospecific competitors (Francis et al. 2009). These other species (ie predators or competitors) may have unique settlement patterns in response to noise and will complicate efforts to measure how noise directly affects the species of interest. Disentangling these interactions will also be essential to understanding the consequences of noise exposure for organisms that are not directly impacted by noise, such as plants that depend on noise-sensitive faunal taxa (Francis et al. 2012) or animals whose hearing range is not tuned to a particular frequency that makes up a sound stimulus.

**Conclusions**

Both policy and scientific literature have often oversimplified the effects of noise on wild animals, typically suggesting that species either are sensitive and abandon noisy areas or are not and remain. In our experience with stakeholders, habitat is an oft-cited reason for persistence and an absence of noise impacts, yet research on other stressors indicates that acclimation to a stressor might not release an organism from costs to fitness (Romero et al. 2009). Additionally, we have shown how behavioral modifications among individuals confronted with noise—even those individuals that outwardly appear to habituate—can lead to decreased fitness. Challenging the assumption that habituation to noise equals “no impact” will be difficult, but will also be a critical component in revealing how a range of behavioral mechanisms link noise exposure to fitness costs. Ideally, we need to predict which combination of noise characteristics and behavioral contexts are most detrimental and under what circumstances behavioral changes affect fitness directly or indirectly. This will require an array of experimental and observational approaches and frameworks that complement the conceptual structure presented here (Figure 3). Other promising frameworks include the risk-disturbance hypothesis (Frid and Dill 2002), which provides an avenue for understanding energetic costs associated with wildlife responses to noise disturbances that are perceived as threats. Studies evaluating aspects of habitat selection and acoustic communication in response to noise may find it useful to frame questions in terms of ecological and evolutionary traps (Schlaepfer et al. 2002). Furthermore, investigations should strive to measure responses along a range of noise exposure levels to reveal the shape of response curves (eg threshold, linear) because these details will be indispensable to resource managers and policy makers when establishing and modifying regulatory limits that reflect the ecological effects of noise exposure. An increase in anthropogenic noise levels is only one of many threats to biodiversity on which ecologists and policy makers should focus their attention. However, rel-
Butterfield-Sentinel Final EIR/EIS

2.0 COMMENTS AND RESPONSES TO DRAFT EIR/EIS

Understanding noise impacts on wildlife

CD Francus and JR. Barber

In addition to other conservation problems, noise may also offer readily available solutions, which, if implemented, could lead to major, measurable improvements for both wildlife and people. For example, use of noise attenuating walls could reduce the area of a landscape exposed to elevated noise levels from natural gas extraction activities by as much as 70% (Francus et al. 2011c) and similar solutions exist for mitigating noise from roadways and cities (Code of Federal Regulations 2010). These mitigation efforts could come with drawbacks; for instance, noise attenuating walls near roads could restrict the movement of wildlife and impede gene flow. Nevertheless, as we develop a better understanding of the ecological effects of noise, implementation of mitigation efforts can begin in many well-studied and high-priority systems (eg oil and gas developments in natural areas, transportation networks in national parks), where limited buffer the potential costs. In addition to protecting contiguous natural habitat, reducing noise exposure in and around developed areas will not only benefit wildlife populations and diversity, but will also provide adjacent human populations with the suite of physiological benefits afforded by living in a quieter community.

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Response to Comment Set 5.
Center for Biological Diversity, California Native Plant Society, San Gorgonio Chapter of the Sierra Club (August 27, 2018)

Response 5-1

This comment generally asserts that the Project would have significant environmental impacts, that the Draft EIR/EIS is inadequate, and that the Project analyzed in the Draft EIR/EIS should not be approved. This comment also provides information on the Center for Biological Diversity (CBD), the California Native Plant Society (CNPS), and the San Gorgonio Chapter of the Sierra Club (collectively referred to as “Conservation Groups”). This general comment is noted for the record and the more specific comments are addressed below.

Response 5-2

This comment states that the Draft EIR/EIS fails to meet the requirements under CEQA and NEPA to include a reasonable range of alternatives, and recommends that underground mining should be evaluated as a reasonable alternative.

Underground mining methods are not suitable or for the Butterfield and Sentinel Quarries due to the geologic composition of the reserve. The quarries consist of unconsolidated substratum as opposed to intact bedrock formations. Underground mining requires competent bedrock formations to properly and safely support access for equipment and workers. The unconsolidated material at these quarries does not have proper rock mechanic properties for support of underground features and infrastructure. The material would entail continual collapses since there is no stable support. The removal of this unconsolidated material in an underground method could lead to surface subsistence at the quarries. This would have various negative impacts including, but not limited to, uncontrolled land disturbances, safety of workers, plant and animal take.

The only underground mining method that could be a consideration for these quarries due to the limit rock mechanic properties is via tunneling. Tunneling would entail a continuous underground boring activity followed by a full concrete lined structure. This method would add significant costs which would render the Project unfeasible. This method, as well as any other underground mining method, would lead to a reduce reserve body loss of up to 50%.

For these reasons, underground mining is not considered a viable alternative for the Project.

Response 5-3

This comment states that the Draft EIR/EIS fails to adequately analyze the impacts of the Project on biological resources or provide sufficient mitigation. The comment does not identify any specific concerns but refers to the following comments. These comments are addressed below. This comment is otherwise noted for the record.
Response 5-4

This comment states that the Conservation Groups support the Carbonate Habitat Management Strategy (CHMS) for the long-term conservation of the carbonate endemic plants, but the commenter has some concerns about the implementation of the CHMS. These concerns are discussed below.

The comment states that the CHMS was never properly initiated because the CHMS commences with a “series of transactions for the additional Furnace Unit Stage 1 Priority Areas to the Reserve (the “Initial Furnace Transactions”)” and that Stage 1 Priority Areas have not yet been secured in the Habitat Reserve. This comment is correct in that the CHMS Furnace Unit has not been “activated” because the required Initial Furnace Transactions conveying Stage 1 Priority Areas to the Habitat Reserve have not been completed.

The purpose of the CHMS was to streamline permitting and environmental review for new mining operations, while creating a regulatory framework to assure adequate mitigation for impacts to the carbonate endemic plant species, and ultimately to provide for the long-term conservation of the Carbonate Plants. The United States Department of Fish and Wildlife (USFWS), in consultation with the United States Forest Service, issued a programmatic biological opinion for the CHMS, pursuant to Section 7 of the Federal Endangered Species Act (ESA), determining that activities that were in compliance with the CHMS would not result in jeopardy to the continued existence of the carbonate endemic plant species. The CHMS was also incorporated into the SBNF Forest Plan (2006), and it is the SBNF’s policy to process calcium carbonate mining proposals in a manner consistent with the CHMS.

The CHMS contemplated the use of Conservation Credits to mitigate impacts to carbonate plants. These Conservation Credits are derived from contributions to the Habitat Reserve regardless of individual species allocation on the contributed property. Once the Initial Furnace Transactions were completed, a project could mitigate impacts through use of such credits. The streamlined ESA compliance provided by the CHMS is reflected in the fungible nature of the Conservation Credits.

As noted, because the initial Habitat Reserve contributions have not been completed consistent with the terms of the CHMS, future mining projects cannot avail themselves of the streamlined ESA compliance process and coverage under the prior Biological Opinion. Accordingly, because the Furnace Unit of the Carbonate Habitat Management Area has not yet been fully activated and the Stage 1 Priority Lands have not yet been sufficiently added to the Habitat Reserve, the Draft EIR/EIS separately analyzed the Project’s impacts to each of the four listed carbonate species and corresponding critical habitat (Impact Statement BIO-1a). Additionally, the Forest Service is conducting a project-level formal Section 7 ESA consultation with the USFWS for the carbonate plants.

The Forest Service developed a significant amount of biological data regarding the location and distribution of carbonate endemic plants and their critical habitat during the CHMS process, which serves as important data incorporated into the analysis of potential significant impacts. Based on the analysis using those data, the Project would be required to mitigate its impacts to each species by an approximate
ratio of 3:1. As explained the Draft EIR/EIS (Table 3.4-7), the Project would add the following claims to the CHMS Habitat Reserve (monitored and enforced through Project Design Feature CARB-2): south ½ of Crystal Creek 9 (80 acres), White Rock 1 and 2 (40 acres), Cushenbury 32 (175 acres), and Rattler 18, 19, 20, 21 (80 acres) – a total of 375 acres. The Project has followed the CHMS provisions for calculating the conservation value of habitat that would be lost to the proposed mining Project, and the Habitat Reserve contributions to offset those losses. The conservation value of the habitat that would be lost from implementation of the Project is 56 conservation units, and the total conservation value of the proposed habitat reserve contributions is 190 conservation units.

The Project’s Habitat Reserve contributions are mostly within the Furnace Unit of the Carbonate Habitat Management Area, and partly within defined Stage 1 Priority Areas for the establishment of Habitat Reserve. As noted in the comment, approximately 4.25 acres of Stage 1 Priority Land (as defined in the CHMS) would be lost through implementation of the proposed Project. Of these 4.25 acres, there are approximately 3 acres of designated critical habitat (for *Acanthoscyphus parishii* var. *goodmaniana*), with no *Acanthoscyphus parishii* var. *goodmaniana* (or any other listed threatened or endangered species) occupied habitat. The S ½ of Crystal Creek #9, a portion of the lands proposed to be dedicated to the Habitat Reserve through this Project, is approximately 80 acres, entirely within the local Dry Canyon/Crystal Creek portion of the Furnace Stage 1 Priority area. The Dry Canyon/Crystal Creek portion of the Furnace Stage 1 Priority lands identified in the CHMS is approximately 967 acres. Additionally, the proposed Cushenbury #32 reserve contribution would include approximately 34 acres within the Furnace Stage 1 Priority lands (in the Blackhawk portion). The loss of 4.25 acres of Furnace Unit Stage 1 Priority areas would constitute about 0.4% of the local portion (and much less of the total Furnace Stage 1 Priority lands). This would be well below the 15%, which is the amount of loss of Carbonate Plant Suitable Habitat within Stage 1 Priority Lands that could foreclose eventual activation of the Furnace Unit (Section 9(b)(i) of the CHMS.)

The reserve contributions will be made through donation of the land in fee and relinquishment of unpatented mining claims. The contributions would also be made in conjunction with (and contingent upon) a withdrawal from mineral location and entry under U.S. mining laws. The Project will be consistent and in full compliance with the CHMS.

**Response 5-5**

The comment states that Figure 3.4-4 does not identify the locations of White Rock 1 and Rattler 18/19. It also states that it is unclear how many mitigation parcels occur within Stage 1 and Stage 2 Priority Areas. The south ½ of Crystal Creek #9 (approximately 80 acres) and about 34 acres of Cushenbury 32 are within the Furnace Unit Stage 1 Priority lands (as defined in the CHMS). The other unpatented claims identified as habitat reserve contributions (White Rock 1 and 2 and Rattler 18, 19, 20, and 21) are not within Stage 1 or Stage 2 (Phased) Priority lands.

Figure 3.4-4 has been revised to show identify the locations of White Rock 1 and Rattler 18 and 19. Also refer to Figures 19, 20 and 21 in the Biological Reports (Draft EIR-EIS, Appendix F).
Response 5-6

The comment notes that Rattler 20 and 21 are not located in the Furnace Unit where the impacts will occur. It is located in the Helendale Unit, miles away from the area of impact.

This comment is true for all four Rattler claims (Rattler 18, 19, 20 and 21). These four Rattler claims are in the Helendale unit, as defined in the CHMS, about 15 lineal miles from the proposed Project area.

Response 5-7

The comment states that in order to justify restoration as a mitigation measure, the Draft EIR/EIS would need to provide additional information and identify, reference, and supply all data regarding successful mine disturbance habitat restoration efforts in the local region where listed plants are fully established, and that are dependent on other plants and animals.

The reclamation and revegetation of the quarry sites are not considered mitigation measures because these activities are required by law under the Surface Mining and Reclamation Act (SMARA). These activities are considered Project design features (see Table 3.4-5). Project design features are aspects of a proposed project that are either required by law or already incorporated into a project design. The Reclamation Plan, which includes a Revegetation Plan, was submitted to the County of San Bernardino, the Department of Mineral Resources (DMR), and to the SBNF as part of the Plan of Operations (POO). As required by SMARA ([California Code of Regulations (CCR) §3705] – Performance Standards for Revegetation), the Reclamation/Revegetation Plan is required to identify success criteria and monitoring procedures. CCR §3705(m) requires that reclaimed revegetated sites be "similar to naturally occurring habitats in the surrounding area." Additionally, SMARA also requires the operator to demonstrate that vegetation on reclaimed sites is self-sustaining without irrigation, fertilization, or weeding for a minimum of two (2) years prior to release of a performance bond. Specific SMARA performance standards for revegetation success are based on achieving vegetation density, cover, and species richness comparable with pre-mining conditions, or with naturally occurring habitats in the area based on appropriate reference sites.

Copies of the Reclamation Plan and Revegetation Plan were provided in the Draft EIR/EIS as Appendix C.

Response 5-8

The comment notes that the claim relinquishment associated with a different project as part of the larger Habitat Reserve assembly for the CHMS has failed to be implemented to date by the BLM. The commenter did not feel this was encouraging and adds concern about the timeline for this Project. This comment is not directly relevant to the Project but is otherwise noted for the record.

Response 5-9

This comment states that the Draft EIR/EIS does not provide adequate mitigation for the listed and non-listed sensitive plants in Table 3.4-4 that were identified in the Project Area and/or Analysis Area. The
comment also states that the Draft EIR/EIS fails to identify any metrics such as the number of sensitive plants that occur on the Project site and that the mitigation measures must include seed collection, deposition and curation of the seed at a seed bank which would insure that seed stock would be available in the future.

Impact Statement BIO-1c addresses potential impacts to other special-status plant species that are known or likely to occur in the Project Area/Analysis Area. The Analysis Area is defined on page 3.4-25 of the Draft EIR/EIS as the area in the immediate vicinity of the Project site but not within the Project site. The Project Area is defined as the area within the boundaries of the proposed activities and is the same as the Project site. The four (4) sensitive plant species that were seen within the Project Area were thoroughly evaluated in the Biological Assessment/Evaluation, Non-Native Species Risk Assessment and Wildlife and Botany Reports (referred to herein as the “Biological Report”) prepared by the SBNF (Draft EIR/EIS, Appendix F) and summarized in the Draft EIR/EIS Section 3.4. It is important to note that the biological assessment concluded that if these species were to occur in the Project Area, the Project may affect an individual plant but is not likely to threaten the viability of the population. As noted on Table 1 of the SBNF’s Biological Report, the determination was “MAI - may affect individuals but not likely to lead to a trend to federal listing for sensitive species” and “NTV – no threat to viability.”

The comment also implies that Mitigation Measure (MM) BIO-1 is the only minimization feature used in the evaluation. However, the impact evaluation of less than significant was not just based on MM BIO-1, but also on the Project design features identified in Table 3.4-1 of the Draft EIR/EIS.

In regards to the concern that the Draft EIR/EIS fails to identify any metrics for the sensitive plants, such as the number of plants within the Project site and areas of disturbance, we refer the comment to the SBNF Biological Report Part IV – Biological Evaluation of Effects to Sensitive Species. Table 20 of the Biological Report lists the sensitive plants known by the SBNF to be in the Project Area and in the Analysis Area. The sensitive species known from the area are individually addressed in Part IV of the Biological Report. For example, in the evaluation for the Crested Milk-vetch, the Biological Report states the following:

“This species is widely scattered in and near the Project area and was recorded during the Project surveys. Within the Project area, this species occurs in three (3) small occurrence groups within the Sentinel Quarry overburden pile expansion area, with about 80 individual plants in total. An additional small occurrence of about 20 plants was reported just north (by about 75 feet) of the Butterfield Quarry expansion area. One other occurrence was reported in 2001 about ½ mile way down the Crystal Creek Haul Road, about 50 feet upslope of the road and about 200 feet downslope of the switchback above. While this was not reported in the more recent surveys, it is presumed to be extant. The number of individual plants in this occurrence was not reported. This species is recorded from one small occurrence in the Habitat Reserve Contribution on the S1/2 of Crystal Creek 9.

The three occurrences totaling about 80 plants within the Sentinel operating area expansion would be permanently lost through clearing and burial of their habitat. While in close proximity to the
Project area, the other occurrences near the Butterfield Quarry expansion and the Crystal Creek haul road are not expected to be affected.”

The Biological Report goes to evaluate the effects and cumulative effects and provides the following determination of effects:

“The Project would not be expected to interfere with maintaining viable well-distributed populations of Astragalus bicrinitatus (Crested Milk-vetch).”

The Biological Report continues to provide this level of detailed evaluation for all the sensitive species known by the SBNF to occur on or near the Project Area, including Shockley’s rockcress, Bear Valley milk-vetch and Parish’s rock cress. We recommend that the commenter read Part IV of the SBNF Biological Report provided in Appendix F of the Draft EIR/EIS.

The comments continue on to say that the mitigation measures must include seed collection, deposition and curation of the seed to ensure that the seed stock would be available in the future. We refer the commenter to Response to Comment 5-7 above and to the Project’s Reclamation Plan and Revegetation Plan provided in Appendix C of the Draft EIR/EIS. The Reclamation Plan and Revegetation Plan provide detailed descriptions of the revegetation that will be conducted at the Project site. This includes discussions on growth media and storage, seeding with locally native species, existing vegetation data, plant salvage, seed collection, plant propagation, site preparation, seeding methods, irrigation, weed control, success criteria and monitoring requirements. SMARA requires that an annual report be submitted to the County which summarizes revegetation and monitoring efforts over the past year and to assess the results of the revegetation. The revegetation areas will be assess utilizing the SMARA approved success criteria. A copy of the 2016 Report was provided in Appendix 11 of the Reclamation Plan (Draft EIR/EIS, Appendix C). As discussed above, because the revegetation and ongoing monitoring is required by law, it is not considered a mitigation measure; therefore, additional mitigations are not required to further address revegetation.

Response 5-10

This comment states a concern regarding the size and isolation of the Cushenbury herd of bighorn sheep and that the herd is critically at risk of extirpation. The following comments identify specific concerns which are addressed below in Response to Comments 5-11 through 5-16. We also refer the commenter to the SBNF Biological Report Section V-2.3.6.11 which provides a detailed evaluation of potential effects/impacts to the Nelson bighorn sheep (Draft EIR/EIS, Appendix F). The SBNF evaluation was prepared with substantial review and input from Jeff Villepique of the California Department of Fish and Wildlife (CDFW). Jeff Villepique is the department’s biologist with extensive local expertise and knowledge of the San Bernardino Mountains population of bighorn sheep, including the Cushenbury herd. This comment is otherwise noted for the record.
Response 5-11
The comment notes that the MM BIO-1 – Relinquishment of Mining Claims states that the areas associated with MM BIO-1 are not known to be used frequently by bighorn sheep. This comment is noted for the record.

Response 5-12
This comment notes that MM BIO-6 required that wildlife and plant awareness training will be implemented. The concern was that this training should already be ongoing at a mining operation, and if the training is already occurring it is unclear how the mitigation measure would actually further mitigate the potential impacts. MM BIO-6 will be revised to clarify that employee training will be “continued” and updated as necessary to reflect current conditions and requirements as well the effectiveness of the training in order to identify any areas of improvement. A revised page with this clarification is provided in Section 3.2 of this Final EIR/EIS.

Response 5-13
The comment states a concern regarding MM BIO-16 which requires over-spraying of the haul road to provide water for the vegetation and create foraging habitat. The comment contests that this is an appropriate mitigation measure because it could put the bighorn sheep in harm’s way.

Omya’s bighorn sheep employee awareness training addresses potential impacts associated with the haul roads and all haul road drivers are required to take this training. The training has proved effective as demonstrated by the fact that there have been no observed mortalities of bighorn sheep on the Crystal Creek Haul Road or Butterfield-Sentinel Quarries. Therefore, it was determined that the benefit of increased foraging habitat outweighed the potential risks associated with the habitat being close to the haul road.

Response 5-14
The comment questions the benefits of MM BIO-17, which requires the reporting of mortalities, since it is assumed that reporting is already being conducted. It is true that reporting is already being conducted and this mitigation measure will be revised to state that the reporting requirement will be “continued” and updated as necessary to reflect current conditions and requirements as well the effectiveness of the training in order to identify any areas of improvement. A revised page with this clarification is provided in Section 3.2 of this Final EIR/EIS.

Response 5-15
This comment states that the Conservation Groups support a conservation strategy for the north slope bighorn sheep; however, the fact that MM BIO-19 only references a “draft” with no indication of when the final version will be available for public review is inadequate. They state that the final plan should be made available for public review prior to finalizing the Draft EIR/EIS. Without seeing the final plan there
is no way to know if the potential impacts will be properly mitigated. The comment also provided some recommendations of what should be addressed in the final plan. These recommendations were considered and incorporated into the final plan as appropriate. A copy of the final North Slope Bighorn Sheep Conservation Strategy plan is provided in Appendix D.

Response 5-16

This comment states that until the North Slope Bighorn Sheep Conservation Strategy is finalized, it is unclear what funding will be necessary to implement it and how it ensures that the funding will not fall short.

As discussed previously, potential impacts to the long-term viability of the population of bighorn sheep on the North Slope would be addressed through an adaptive management approach in the North Slope Bighorn Sheep Management Plan and by Omya’s required participation in and funding for a North Slope Bighorn Sheep Conservation Strategy. Please see Mitigation Measures BIO-16 through BIO-21 presented in the Draft EIR/EIS which describe Omya’s role in implementing and funding their fair share of the North Slope Bighorn Sheep Conservation Strategy. With implementation of these mitigation measures and compliance with the North Slope Bighorn Sheep Conservation Strategy, Omya will provide sufficient funding to ensure the long-term viability of Nelson's bighorn sheep as a species in the SBNF. A copy of the final North Slope Bighorn Sheep Conservation Strategy is provided in Appendix D.

Response 5-17

The commenters state their support for a raptor conservation plan and also note that California law already states that there can be no take of federally protected raptors. This comment is noted for the record.

Response 5-18

The commenters state that they support DF-4 of the RCS (same as Project Design Feature GEN-1(i) in the Draft EIR/EIS) which states that no recreational target shooting will occur on National Forest Service (NFS) lands, they felt that it should also include language regarding the use of only non-lead ammunition. Because shooting is already prohibited, there is not a need to discuss non-lead ammunition; therefore, the Project design feature does not require revision. A copy of the final RCS is provided in Appendix C.

Response 5-19

The comment states the opinion that reclaimed land will never achieve the ability to support species that undisturbed habitat does. This comment does not address a specific issue and is otherwise noted for the record.
Response 5-20

The comment notes that the RCS is not final and has not been adopted into the Land Management Plan (LMP) for the National Forest. The Draft EIR/EIS does not provide a timeline for when the RCS will be finalized. Therefore, it is premature to rely on the RCS for the mitigation of potential impacts to raptors.

As discussed in Section 2.1.2 previously, the RCS was made available in draft form in Appendix F-4 of the Draft EIR/EIS for the public to review and provide comments. Based on comments received during the 45-day Draft EIR/EIS comment period, revisions were made to the RCS plan. The final RCS plan, with revisions incorporated based on comments received, is provided in Appendix C. Per Measure BIO-7 presented in the Draft EIR/EIS, Omya will participate in the implementation strategy and follow the guidelines set forth in the final Raptor Conservation Strategy.

Response 5-21

The comment states that additional safeguards need to be established to further protect other sensitive animals that may be in the Analysis Area, such as specific snakes identified in the comment. The comment states that these species are mobile but could probably not move fast enough to avoid harm. The commenter recommends a mitigation measure requiring preconstruction clearance surveys. As shown on Table 3.4-4, the majority of other sensitive animals were either not observed on the Project site or considered unlikely to be present on the Project site. In addition, the table shows that the SBNF determined that even if an individual animal was affected, the Project would not likely lead to a trend to federal listing for the sensitive species nor would there be any threat to viability. Therefore, it is not reasonable to require clearance surveys for these animal species.

Response 5-22

This comment is the same as Comment 5-21 except that it mentions numerous other mammal species. Please see response above for Comment 5-21.

Response 5-23

The comment states that the Project will impact 0.089 acres of a drainage that forms the headwaters of the Mojave River and that this requires consultation with state and federal agencies. Consultation with the Army Corp of Engineers and Regional Water Quality Board has been initiated. These agencies have the authority to determine the appropriate actions required to protect the waters of the state and U.S. Other than disclosing this information and the need for consultation with the appropriate responsible agencies, there is no further evaluation required.

Response 5-24

This comment states that as shown on Figure 3.4-2, there are several Riparian Conservation Areas (RCAs) in and around the Project site; therefore, the Forest Service should implement the Forest Service’s Five-step Project Screening Process for RCAs.
The RCAs that were identified in Figure 3.4-2 were based on modeled information. Since that time field work has been conducted by the Forest Service and based on actual observations it was determined that these areas were not properly identified in the model and are in fact ephemeral drainages and not subject to the management provisions that apply to RCAs. The discussion of RCAs and Figure 3.4-2 have been removed from the Draft EIR/EIS.

**Response 5-25**

The comment states that the Draft EIR/EIS did not adequately evaluate potential noise impacts on wildlife. It also states that certain Project design features (GEN-1, 2, 7, 8, and 9) were not provided in the body of the Draft EIR/EIS, but only in the Biological Report attached as Appendix F.

We refer the commenter to Table 3.4-2 in the Draft EIR/EIS, which includes Project Design Features GEN-1, 2, 7, 8, and 9. As stated in Section 3.9 in the Draft EIR/EIS, potential noise impacts was screened out in the Initial Study; therefore, only a brief summary of why noise was not carried on into the Draft EIR/EIS for further evaluation is provided. We refer the commenter to Section 3.9 of the Draft EIR/EIS.

**Response 5-26**

The comment states that the Draft EIR/EIS does not provide an adequate analysis of cumulative impacts and therefore must be recirculated. The comment also states that the Draft EIR/EIS does not contain a separate section to discuss cumulative impacts.

Section 4.4 of the Draft EIR/EIS – Cumulative Effects states that cumulative effects/impacts are discussed for each individual resource in Section 3.0. This is an acceptable way to format the Draft EIR/EIS. It should be noted that as explained in Section 1.5.1 – Terminology, the terms “effect” and “impact” are used synonymously.

The comment also states that the Draft EIR/EIS’s discussion of cumulative impacts is included in piecemeal manner. It is unclear precisely what this comment means by a “piecemeal manner.” As stated above, the cumulative impacts were addressed in each resource section of Section 3.0. To further clarify how cumulative impacts were analyzed, Section 3.0 was revised to provide a more detailed explanation. Figure 3.0-1 provides a map that identifies the location of the past, present, and foreseeable actions in the Analysis Area. Table 3.0-1 provides a list of the relevant past, present, and reasonably foreseeable actions. It should be noted that due to the nature of the resources, the cumulative evaluation of Aesthetics and Biological Resources addressed different or additional projects than those identified in Table 3.0-1. In addition, the NEPA cumulative analysis has been revised to be consistent with the evaluation within the Biological Resources section. Specifically, it was clarified that with the implementation of North Slope Bighorn Sheep Conservation Strategy, potential cumulative impacts to the Nelson’s bighorn sheep would be less than significant.
2.2.4 Response to Individuals Comments

As previously discussed, “everyactioncustom.com” submitted 1,155 emails on behalf of members of the Center for Biological Diversity (CBD). The comments were virtually identical in all 1,155 emails and typically did not provide specific or substantive comments. The comments were primarily regarding their opinion of the inadequate evaluations provided in the Draft EIR/EIS, concern with the implementation of the CHMS, and the lack of final versions of the RCS and North Slope Bighorn Sheep Conservation Strategy. These comments have been addressed in Section 2.1 – Collective Responses, CR-1 through CR-3. A list of the individuals that “everyactioncustom.com” submitted emails on behalf of is provided in Appendix A.
3.0  REVISIONS AND CORRECTIONS TO THE DRAFT EIR/EIS

3.1  Revisions

The following revisions are made to the text of the Omya Butterfield-Sentinel Draft EIR/EIS. Amended text is identified by page number. Clarifications and revisions to the Draft EIR/EIS text are shown with underlining and text removed from the Draft EIR/EIS is shown with strikethrough.

3.1.1  Draft EIR/EIS Section ES, Revisions to Table ES-3 – Impacts and Mitigation Measures Summary (Pages ES-21 through ES-47)

Explanation

In response to Draft EIR/EIS comments provided by the Conservation Groups, two mitigation measures were revised (BIO-6 and BIO-17). Please see Section 2.2.2 for more detail. Therefore, the following revisions to Table ES-3 found within the Draft EIR/EIS, which provided a summary of the potentially significant impacts, applicable mitigation measures, and the level of significance after mitigation, have been made. The new and revised mitigation measures will be made conditions of Project approval and included in the Mitigation Monitoring and Reporting Program (MMRP) in Chapter 4.0 of this Final EIR/EIS.
## Table ES-1

**Impacts and Mitigation Measures Summary**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
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</thead>
<tbody>
<tr>
<td><strong>Aesthetics</strong></td>
<td></td>
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<tr>
<td><strong>Impact A-1</strong> Substantial adverse effect on a scenic vista. (<em>CEQA Guidelines Threshold Criteria (a), Forest Service Criteria 2</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact A-2</strong> Substantially damage scenic resources, including but not limited to trees, rock outcroppings and historic buildings within a state scenic highway. (<em>CEQA Guidelines Threshold Criteria (b), Forest Service Criteria 2</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact A-3</strong> Substantially degrade the existing visual character or quality of the site and its surroundings. (<em>CEQA Guidelines Threshold Criteria (c), Forest Service Criteria 1, 2 and 3</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact A-4</strong> Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. (<em>CEQA Guidelines Threshold Criteria (d), Forest Service Criteria 2</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact A-5</strong> Nonconformance to and inconsistency with the Forest Service Scenic Integrity Objectives (SIO’s). (<em>Forest Service Criteria 1</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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<tr>
<td><strong>Impact A-6</strong> Nonconformance to and inconsistency with the Forest Service Scenic Values. <em>(Forest Service Criteria 2)</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact A-7</strong> Not meeting the Forest Service reclamation requirements for scenic resources. <em>(Forest Service Criteria 3)</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Agriculture &amp; Forestry</strong></td>
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</tr>
<tr>
<td>Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. <em>(CEQA Guidelines Threshold Criteria (a))</em></td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>Conflict with existing zoning for agricultural use or a Williamson Act contract. <em>(b))</em></td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>Conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland zoned Timberland Production. <em>(CEQA Guidelines Threshold Criteria (c))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Result in the loss of forest land or conversion of forest land to non-forest use. <em>(CEQA Guidelines Threshold Criteria (d))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Involve other changes in the existing environment, which due to their location or nature, could result in conversion of forest land to non-forest use. <em>(CEQA Guidelines Threshold Criteria (e))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Air Quality and Greenhouse Gas Emissions</strong></td>
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<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
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<tr>
<td>Impact AQ-1 Conflict with or obstruct implementation of the applicable air quality plan. (<em>CEQA Guidelines Threshold Criteria AQ(a), GHG (a) &amp; (b); MDAQMD (1) &amp; (3)</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact AQ-2: Emissions of air pollutants resulting in violation of any air quality standards or contribute substantially to an existing or projected air quality violation. (<em>CEQA Guidelines Threshold Criteria (b); MDAQMD Criteria (2)</em>)</td>
<td>Significant</td>
<td>Mitigation Measure AQ-1: Dust Control – Unpaved Roads: Unpaved roads shall be controlled by at least 80% using methods that are consistent with MDAQMD guidance.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact AQ-3: Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). (<em>CEQA Guidelines Threshold Criteria (c); MDAQMD Criteria (2) &amp; (3)</em>)</td>
<td>Significant</td>
<td>Mitigation Measures AQ-1 and AQ-2</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact AQ-4: Exposure of sensitive receptors to substantial pollutant concentrations. (*CEQA Guidelines Threshold Criteria (d); MDAQMD Criteria 4)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
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<tr>
<td>Biological Resources</td>
<td>See Below</td>
<td>See Below</td>
<td>See Below</td>
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<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
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<td><strong>Impact BIO-1</strong>: Substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. *(CEQA Guidelines Threshold (a))</td>
<td>See Below</td>
<td>See Below</td>
<td>See Below</td>
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<tr>
<td><strong>Impact BIO-1a</strong>: Threatened and Endangered Plants Species</td>
<td>Significant</td>
<td>Mitigation Measure BIO-1: Relinquish Mining Claims: Omya shall relinquish through a quit-claim process, the identified acreage located within the unpatented mining claims as shown in Table 3.4-3. These areas have been verified by the SBNF to contain habitat for the specified endangered or threatened species pursuant to the CHMS. Table 3.4-6 identifies the number of acres in the Project and mitigation parcels for each T/E plant species. Mitigation for affected T/E plants is a minimum of 3:1 based on conservation value (as described in the CHMS). <em>(SBNF Biological Report PDF CARB-1 and 2)</em></td>
<td>Less than Significant</td>
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<tr>
<td></td>
<td>Significant</td>
<td>Mitigation Measure BIO-2: Non-native Species – Inspections: Omya shall visually monitor the occurrence of non-native invasive plants on-site by visual inspection. The goal is to prevent non-native invasive plants from becoming established and depositing seeds in areas to be re-vegetated at a later date. If inspections reveal that weeds are becoming an issue or have established on-site, then removal would be initiated by Omya in coordination with the Forest Service botanist. Inspections shall be made in conjunction with Project’s revegetation monitoring. <em>(SBNF Biological Report PDF NNS-1)</em></td>
<td>Less than Significant</td>
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<td>Impact</td>
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<tr>
<td>Impact BIO-1a <em>(continued)</em></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-3: Non-native Species – Equipment Cleaning:</strong> To reduce the risk of introducing non-native invasive plants, insects, and pathogens from off-site, all heavy mining equipment (e.g., drill rigs, haul trucks and loaders) must be thoroughly washed of all soil and vegetation debris prior to being brought into the Project Area. <em>(SBNF Biological Report PDF NNS-2)</em></td>
<td>Less than Significant</td>
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<td></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-4: Non-native Species – Control and Eradication:</strong> Since the Project is expected to last 40 years and new non-native invasive plants and animals may become established in the region, an adaptive management approach is necessary. If any new non-native invasive plants, animals, or pathogens are identified as having a potential for establishment in the Project Area, the Forest Service, CDFW and Omya will develop measures for detection, control, and eradication as necessary. Omya shall be responsible for funding detection, control, and eradication efforts. <em>(SBNF Biological Report PDF NNS-3)</em></td>
<td>Less than Significant</td>
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<td></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-5: Personnel Training – Domestic and Feral Animals:</strong> Omya personnel will be trained and will report sightings of domestic sheep, goats, dogs, and cats on and near the facility to the Forest Service and CDFW within two hours of the observation. In the event of domestic or feral animals being found, Omya shall employ a trained trapper to catch and remove the animals following County regulations. CDFW may assist capture/removal efforts if available. <em>(SBNF Biological Report PDF NNS-4)</em></td>
<td>Less than Significant</td>
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<tr>
<td>Impact BIO-1a (continued)</td>
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<td>Mitigation Measure BIO-6: Wildlife and Plant Awareness: Omya shall continue to conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will address bighorn sheep, desert tortoise, raptors, other animals of the area, and rare plants. This will include the importance of avoiding harassment/disturbance, adherence to speed limits, adherence to defined project boundaries, reporting guidelines, etc. CDFW and USFS will provide assistance in developing the training program. (SBNF Biological Report GEN-2)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact BIO-1b: Threatened and Endangered Animal Species</td>
<td>See Below</td>
<td>See Below</td>
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| **California Condor (Gymnogyps californianus)** | Significant                            | Mitigation Measure BIO-1, and the following:  
Mitigation Measure BIO-7: Raptor Conservation Strategy (RCS): A RCS shall be developed in coordination with the Forest Service, USFWS, and CDFW. Omya shall provide input to the development/finalization of the RCS and shall follow the guidelines put forth in the effort. The RCS will be tailored for activities associated with mining activities and effects. Upon approval of the Plan of Operations and the Reclamation Plan by the County and the Forest Service, Omya will participate in the implementation of the strategy by contributing to specified survey and monitoring efforts and by the following applicable operation guidelines.  
The RCS will cover the North Slope of the San Bernardino Mountains from the White Mountain to Terrace Springs, and will address golden eagles, California condor, peregrine falcon, and prairie falcon. The RCS may be updated to include other raptors in the future if concerns develop over their local population status.  
The RCS will be a dynamic document and will be updated as new data and scientific understanding of the aforementioned species become available. It will include monitoring and information gathering and measures to avoid, minimize, rectify, and reduce (or eliminate over time) effects to raptors nesting on the North Slope. The intent is to use systematic monitoring or raptor nesting chronology and observed behavior to develop site- and activity-specific measures to ensure successful nesting and provide for adaptive management opportunities. (SBNF Biological Report PDF RAPTOR-1) | Less than Significant |
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<tr>
<td>California Condor (<em>Gymnogyps californianus</em>) (continued)</td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-8: Raptor Monitoring:</strong> If an occupied raptor nest is located within 1.5 miles of the active mining area, the mining company shall provide a qualified biologist to monitor during blasting for disturbance as a result of the mining activities. Monitoring results will be provided to the Forest Service biologist via email within 48 hours of a blast. The Forest Service will coordinate appropriate notification, as necessary, with USFWS and CDFW. <em>(SBNF Biological Report PDF RAPTOR-1)</em></td>
<td>Less than Significant</td>
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<td></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-9: Raptor Nesting Regulatory Coordination:</strong> If an occupied nest for a Federally or State protected species is found within 1.5 miles of an active quarry operation, the SBNF shall conduct an evaluation to determine the appropriate course of action under applicable State and Federal laws (e.g. “incidental take” authorization, Endangered Species Consultation) <em>(SBNF Biological Report PDF RAPTOR-2)</em></td>
<td>Less than Significant</td>
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<td></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-10: Raptor Nesting Protection:</strong> If monitoring detects that blasting or other mine activities are resulting in disturbance of nesting raptors that could lead to mortality or nest abandonment, the Forest Service, Omya, USFWS and CDFW, as appropriate, shall evaluate the feasibility of implementing measures to avoid or reduce the effects. The RCS will contain some potential methods for reducing or avoiding effects. <em>(SBNF Biological Report PDF RAPTOR-3)</em></td>
<td>Less than Significant</td>
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<tr>
<td>Desert Tortoise (<em>Gopherus agassizil</em>)</td>
<td>Significant</td>
<td>Mitigation Measure BIO-11: Personnel Training – Desert Tortoise: Omya shall work with the SBNF and CDFW and incorporate desert tortoise education and awareness into their training for employees, customers, and contractors. This shall include how to minimize impacts to desert tortoises and their habitats. Information about penalties shall also be included. These briefings shall include guidelines about driving in desert tortoise habitat, handling prohibitions, etc. Omya shall work with SBNF and CDFW to develop other protective measures if monitoring identifies a need. (SBNF Biological Report PDF DETO-1)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Southern Rubber Boa (<em>Charina bottae umbratica</em>)</td>
<td>Significant</td>
<td>Mitigation Measure BIO-12: Desert Tortoise Reporting: Any sightings of desert tortoises, including dead tortoises, must be reported to the Forest Service biologist. The report should include photos if possible, location, date, time, cause of death (if obvious), and any other pertinent information. (SBNF Biological Report PDF DETO-2)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Swainson’s Hawk (<em>Buteo swainsoni</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact BIO-1c: Other Special Status Species – Plants</td>
<td>See Below</td>
<td>See Below</td>
<td>See Below</td>
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<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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<tr>
<td>Coville’s Dwarf Abronia (<em>Abronia nana var. covillei</em>), Crested Milkvetch (<em>Astragalus bicristatus</em>), Bear Valley Milkvetch (<em>Astragalus lentiginosus var. sierra</em>), Parish’s Rock Cress (<em>Boechera parishii</em>), Shockley’s Rock Cress (<em>Boechera shockleyi</em>), Parish’s Alumroot (<em>Heuchera parishii</em>), Bear Valley Phlox (<em>Phlox dolichantha</em>)</td>
<td>Significant</td>
<td>Mitigation Measure BIO-1</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact BIO-1d:</strong> Other Special Status Species – Amphibians and Reptiles</td>
<td>See Below</td>
<td>See Below</td>
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<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
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<td>Impact</td>
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<tr>
<td><strong>Impact BIO-1e: Other Special Status Species – Birds</strong></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-1, BIO-6, and the following:</strong></td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-13: Ground Clearing:</strong> During the development of the quarry and associated facilities, all initial ground clearing (vegetation removal, grading, etc.) shall ideally occur outside the avian breeding season, and potential nesting habitat shall not be removed from February 1 through August 31, or appropriate dates based on on-site nesting phenology determined by a qualified biologist. For initial ground clearing (vegetation removal, grading, etc.) that is not feasible to be conducted outside the nesting season, surveys shall be conducted to locate active nests. Any active nest sites that are located shall be buffered and no work shall be conducted within those buffered areas until the nests are no longer active. The buffer distances would be determined by current species-specific standards. (SBNF Biological Report PDF BIRD-1)</td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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</tbody>
</table>
| Impact BIO-1e: Other Special Status Species – Birds *(continued)* | Significant | **Mitigation Measure BIO-14: Nesting Surveys:** Nesting bird surveys for passerine birds, as outlined under MM BIO-13, guidelines area as follows:  
- A qualified biologist shall be experienced and familiar with robust nest-locating techniques or comparable to those described by Martin and Guepel (1993).  
- Surveys shall be conducted in accordance with the following guidelines:  
  - Surveys shall cover all potential nesting habitat to be disturbed and a 500 foot buffer surrounding areas to be disturbed.  
  - At least two pre-construction surveys, separated by a minimum 10 day interval, shall be completed prior to initial grading or grubbing activity; the later survey shall be completed no more than 10 days preceding initiation of initial grading or grubbing activity. Additional follow-up surveys shall be required if periods of construction inactivity exceed one week in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation. *(SBNF Biological Report PDF BIRD-2)* | Less than Significant |
<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
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<tr>
<td><strong>Impact BIO-1e:</strong> Other Special Status Species – Birds <em>(continued)</em></td>
<td>Significant</td>
<td>Mitigation Measure BIO-15: Nesting Season – Crystal Creek Well: To the greatest extent possible, maintenance activities at the Crystal Creek well and access road would be avoided during the nesting season for California spotted owl and other nesting birds (February 1 through August 15). Exceptions may be considered depending on planned activities and associated noise levels, after coordination with the Forest Service biologist or if protocol-level surveys determine the territory is vacant. If emergency repairs are required within the breeding season, the company shall notify the Forest Service within 24 hours. <em>(SBNF Biological Report PDF CC-1)</em></td>
<td>Less than Significant</td>
</tr>
<tr>
<td>California Spotted Owl <em>(Strix occidentalis occidentalis)</em></td>
<td>Significant</td>
<td>Mitigation Measures BIO-6 and BIO-13 through BIO-15</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Willow Flycatcher <em>(Empidonax traillii)</em></td>
<td>Significant</td>
<td>Mitigation Measures BIO-1 and BIO-13 through BIO-15</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Gray Vireo <em>(Vireo vicinior)</em></td>
<td>Significant</td>
<td>Mitigation Measures BIO-1 and BIO-13 through BIO-15</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Bendire’s Thrasher <em>(Toxostoma bendirei)</em>, LeConte’s Thrasher <em>(Toxostoma leconteri)</em>, Yellow Warbler <em>(Dendroica petechial brewsteri)</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Golden Eagle <em>(Aquila chrysaetos)</em></td>
<td>Significant</td>
<td>Mitigation Measures BIO-1, BIO-6, BIO-7 through BIO-10, BIO-13 through BIO-15</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact BIO-1f:</strong> Other Special Status Species – Mammals</td>
<td>See Below</td>
<td>See Below</td>
<td>See Below</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------</td>
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<td>---------------------------------</td>
</tr>
<tr>
<td>San Bernardino Flying Squirrel (<em>Glaucomys sabrinus californicus</em>), San Diego Pocket Mouse (<em>Chaetodipus fallax fallax</em>), San Diego Desert Woodrat (<em>Neotoma lepida intermedia</em>)</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>American Badger (<em>Taxidea taxus</em>)</td>
<td>Significant</td>
<td>Mitigation Measure BIO-1</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Nelson’s Bighorn Sheep (<em>Ovis canadensis nelsoni</em>)</td>
<td>Significant</td>
<td>Mitigation Measures BIO-1, BIO-6, and the following:</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------</td>
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<td>------------------------------------------------------------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>Nelson’s Bighorn Sheep (<em>Ovis canadensis nelsoni</em>) (continued)</td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-16: Bighorn Sheep Foraging Habitat:</strong> When trucks spray water on haul roads to control fugitive dust, some overspray occurs on road berms for a short distance beyond. Those watered areas sometimes support vegetation that bighorn sheep consume. Omya will not make an effort to eliminate the overspray. The Project’s Revegetation Plan shall focus on using native species that will help enhance bighorn sheep habitat. (SBNF Biological Report PDF BHS-1)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-17: Bighorn Sheep Reporting of Mortality:</strong> Omya shall continue to immediately report any bighorn sheep mortalities, whatever the cause, to the CDFW and Forest Service as soon as possible after the observation. The bighorn sheep carcass shall be left in place until the CDFW or Forest Service biologist can examine it and determine the proper disposal method. In the event that mountain lion predation is occurring at levels that compromise the viability of the population, Omya shall cooperate fully by ensuring access to Omya properties to determine the predator involved or, in the event that an individual predator has been identified, for removal of the predator. (SBNF Biological Report PDF BHS-2)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------</td>
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<td>---------------------------------</td>
</tr>
<tr>
<td>Nelson’s Bighorn Sheep (<em>Ovis canadensis nelsoni</em>) (continued)</td>
<td>Significant</td>
<td>Mitigation Measure BIO-18: Bighorn Sheep Monitoring/Adaptive Management: Omya shall monitor bighorn sheep use in and near their operations and at water sources in and adjacent to their operations. Monitoring shall consist of maintenance of cameras stationed at water sources and recording of data from cameras in a database developed by CDFW, as well as collection of observations by Omya employees. An annual monitoring report will be provided to the Forest Service and CDFW. (SBNF Biological Report PDF BHS-3)</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>
| Nelson’s Bighorn Sheep (*Ovis canadensis nelsoni*) (continued)       | Significant           | Mitigation Measure BIO-19: North Slope Bighorn Sheep Conservation Strategy: A Draft North Slope Bighorn Sheep Conservation Strategy will be developed by CDFW and the Forest Service which will include:  
- Guidelines/thresholds for population status that would trigger augmentation of the herd;  
- A strategy/guidelines for developing water sources to respond to drought years;  
- Herd monitoring methodology and objectives. Omya will be a partner in the North Slope Bighorn Sheep Conservation Strategy and will help support the long-term management goals of maintaining a sustainable population of bighorn sheep on the North Slope. (SBNF Biological Report PDF BHS-4) | Less than Significant           |
<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nelson's Bighorn Sheep (Ovis canadensis nelsoni) (continued)</td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-20: Future Conservation and Management:</strong> Within one year after approval, Omya shall begin contributing to a non-wasting endowment, designated as the North Slope Bighorn Sheep Conservation Fund (Fund). The amount of Omya's contributions shall be determined by CDFW in coordination with Omya. The Fund shall be administered by the National Fish and Wildlife Foundation as a sub-account of the California Department of Fish and (Game) Wildlife Master Mitigation Account. This sub-account shall be managed as a long term endowment dedicated to activities that aid in conservation and monitoring of bighorn sheep both within the Cushenbury herd and on proximate habitats, occupied or unoccupied, including the Bighorn Mountains and San Gorgonio Wilderness where immigration and emigration may connect groups into a functional metapopulation. (SBNF Biological Report PDF BHS-5)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Mountain Lion (Felis concolor californica)</td>
<td>Significant</td>
<td><strong>Mitigation Measure BIO-21: Bighorn Sheep Employee Awareness Training:</strong> Omya will consult with the CDFW to incorporate bighorn sheep education and awareness into their training for employees and contractors. Training will include how to minimize impacts to bighorn sheep and include guidelines for driving, operation of heavy equipment, general quarry operation, and blasting in bighorn sheep habitat. (SBNF Biological Report PDF BHS-6)</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Mitigation Measure BIO-1</strong></td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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</tr>
<tr>
<td>Impact BIO-2: Substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. <em>(CEQA Guidelines Threshold Criteria (b))</em></td>
<td>Significant</td>
<td>Mitigation Measure BIO-22: Jurisdictional Water and Agency Consultation: Prior to activities that could impact Waters of the United States or the State as identified in the Project JD, the ACOE, RWQCB-Lahontan Region and CDFW shall be consulted for concurrence with the findings of the JD and to determine if regulatory permits or approvals (i.e.: Streambed Alteration Agreement, coverage under the National Permit, Waste Discharge Request/Section 401) would be required and if considered necessary, the appropriate permits and/or approvals shall be obtained.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Other Sensitive Natural Communities</td>
<td>Significant</td>
<td>Mitigation Measure BIO-1</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact BIO-3: Substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filing, hydrological interruption, or any other means. <em>(CEQA Guidelines Threshold Criteria (c))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact BIO-4: Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. <em>(CEQA Guidelines Threshold Criteria (d))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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</tr>
<tr>
<td><strong>Impact BIO-5</strong>: Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance. <em>(CEQA Guidelines Threshold Criteria (e))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>
| **Impact BIO-6**: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. *(CEQA Guidelines Threshold Criteria (f))* | Significant | Carbonate Habitat Management Strategy: Mitigation Measures BIO-1, PLANT-1 and PLANT-2, CARB-1 and CARB-2  
Raptor Conservation Strategy: Mitigation Measures BIO-6 through BIO-10  
North Slope Bighorn Sheep Conservation Strategy: Mitigation Measures BIO-6, BIO-16 through BIO-20 | Less than Significant |

**Cultural**

<p>| Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5. <em>(CEQA Guidelines Threshold Criteria (a))</em> | No Impact | None Required | No Impact |
| Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. <em>(CEQA Guidelines Threshold Criteria (b))</em> | No Impact | None Required | No Impact |
| Directly or indirectly destroy a unique paleontological resource or site or unique geological feature. <em>(CEQA Guidelines Threshold Criteria (c))</em> | No Impact | None Required | No Impact |
| Disturb any human remains, including those interred outside of formal cemeteries. <em>(CEQA Guidelines Threshold Criteria (d))</em> | No Impact | None Required | No Impact |</p>
<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
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</thead>
<tbody>
<tr>
<td><strong>Geology &amp; Soils</strong></td>
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</tbody>
</table>
| **Impact GS-1:** Expose people or structures to potential substantial adverse effects, involving the risk of loss, injury, or death involving (CEQA Guidelines Threshold Criteria (a)):  
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map issued by the State Geologist for the area or based on other substantial evidence of known fault;  
  - Strong seismic ground shaking;  
  - Seismic-related ground failure, including liquefaction; or landslides.  
  (CEQA Guidelines Threshold Criteria (a)) | Significant | Mitigation Measure GS-1: Inspect slope conditions after seismic events and remove precarious rocks from slopes: This mitigation measure requires that slope conditions in the Project Area be inspected after a seismic event exceeding 5.5 magnitude on the Richter Scale originating from an epicenter located within 100 miles of the Project Area. Quarry operations will be halted until a qualified geotechnical engineer is retained to inspect slope conditions for potential loose blocks or other unsafe or unstable conditions. Any required slope stabilization measures must lead to achievement of a minimum factor of safety of 1.5 before quarry operations continue. Under this mitigation measure, the Project Area also must be inspected for precarious rocks. Natural weathering processes would result in accumulation of talus on excavated benches. The talus can be left on the slopes to facilitate revegetation and to give reclaimed slopes a relatively natural appearance. It is anticipated that any boulders resulting from weathering processes would be angular and would therefore be less likely to roll downhill. Any large unstable rounded boulders on slopes steeper than 2:1 must be removed or stabilized where accessible. Areas below loose rocks must be restricted from entry and identified with proper signage. | Less than Significant |
| **Impact GS-2:** Result in substantial soil erosion or the loss of topsoil.  
  (CEQA Guidelines Threshold Criteria (b)) | Less than Significant | None Required | Less than Significant |
### Impact GS-3:

- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. *(CEQA Guidelines Threshold Criteria (c))*

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>GS-3</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to the life or property. *(CEQA Guidelines Threshold Criteria (d))*

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>GS-3</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. *(CEQA Guidelines Threshold Criteria (e))*

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>GS-3</td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>

### Hazards & Hazardous Materials

- Create a significant hazard to the public or the environment through routine transport, use or disposal of hazardous materials. *(CEQA Guidelines Threshold Criteria (a))*

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. *(CEQA Guidelines Threshold Criteria (b))*

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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<td>-----------------------------------------------------------------------</td>
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<td>--------------------------------</td>
</tr>
<tr>
<td>Emit hazardous emissions or handle hazardous or acutely hazardous</td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>materials, substances, or waste within one-quarter mile of an existing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>school. <em>(CEQA Guidelines Threshold Criteria (c))</em></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Be located on a site which is included on a list of hazardous</td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>materials sites complied pursuant Government Code Section 65962.5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>and as a result, would it present a significant hazard to the public</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>or the environment. <em>(CEQA Guidelines Threshold Criteria (d))</em></td>
<td></td>
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</tr>
<tr>
<td>For a project located within an airport land use plan or where such</td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>a plan has not been adopted, within</td>
<td></td>
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<tr>
<td>two miles of a public airport or public use airport, would the project</td>
<td></td>
<td></td>
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<tr>
<td>result in a safety hazard for people residing or working in the</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project Area. <em>(CEQA Guidelines Threshold Criteria (e))</em></td>
<td></td>
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</tr>
<tr>
<td>For a project within the vicinity of a private airstrip, would the</td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>project result in a safety hazard for people residing or working in</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>the Project Area. <em>(CEQA Guidelines Threshold Criteria (f))</em></td>
<td></td>
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</tr>
<tr>
<td>Impair implementation of or physically interfere with an adopted</td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>emergency response plan or emergency evacuation plan. *(CEQA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guidelines Threshold Criteria (g))</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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</tr>
<tr>
<td>Expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. <em>(CEQA Guidelines Threshold Criteria (h))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Hydrology</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact HWQ-1:</strong> Violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater water quality. <em>(CEQA Guidelines Threshold Criteria (a))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact HWQ-2:</strong> Substantial depletion groundwater supplies or substantial interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). <em>(CEQA Guidelines Threshold Criteria (b))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact Description</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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<tr>
<td>----------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td><strong>Impact HWQ-3: Substantial alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-or off-site. (CEQA Guidelines Threshold Criteria (c))</strong></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact HWQ-4: Substantial alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site. (CEQA Guidelines Threshold Criteria (d))</strong></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact HWQ-5: Creation or contribution to runoff water which would exceed the capacity of existing or planned stormwater drainage systems, cause flooding on-and off-site, or provide substantial additional sources of polluted runoff. (CEQA Guidelines Threshold Criteria (e))</strong></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Impact HWQ-6: People or structures exposure to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. (CEQA Guidelines Threshold Criteria (h))</strong></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>
### Impact

<table>
<thead>
<tr>
<th>Impact HWQ-7:</th>
<th>Inundation by seiche, tsunami, or mudflow. <em>(CEQA Guidelines Threshold Criteria (i))</em></th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
<td></td>
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</tbody>
</table>

### Noise

<table>
<thead>
<tr>
<th>Effect</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. <em>(CEQA Guidelines Threshold Criteria (a))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. <em>(CEQA Guidelines Threshold Criteria (b))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. <em>(CEQA Guidelines Threshold Criteria (c))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. <em>(CEQA Guidelines Threshold Criteria (d))</em></td>
<td>Less than Significant</td>
<td>None Required</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels. <em>(CEQA Guidelines Threshold Criteria (e))</em></td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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<tr>
<td>----------------------------------------------------------------------</td>
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</tr>
<tr>
<td>For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels. <em>(CEQA Guidelines Threshold Criteria (f))</em></td>
<td>No Impact</td>
<td>None Required</td>
<td>No Impact</td>
</tr>
</tbody>
</table>

– END OF REVISION –
3.1.2 Draft EIR/EIS Section 3.3, Air Quality (Pages 3.3-15 and 51)

Explanation

In response to Draft EIR/EIS comments provided by the EPA, revisions were made to Draft EIR/EIS Section 3.3, Air Quality. Specifically, the discussions and analysis related to federal General Conformity regulations have been revised. On April 5, 2010, the EPA revised the General Conformity regulations [40 CFR 93.153(i)] and deleted the regionally significant test that a project could screen-out of conformity analysis if its emissions are less than 10% of the non-attainment area emissions inventory. As this General Conformity determination is no longer applicable, the following revisions have been made to Section 3.3 of the Draft EIR/EIS.

Federal Conformity

A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. An example of a non-conforming project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).

Federal Conformity regulation (40CFR93) and MDAQMD Rule 2002 which mirrors the federal regulation were adopted in order to ensure that federal actions conform to the applicable implementation plan. Federal actions where the total of direct and indirect emissions in a nonattainment or maintenance area is less than specified rates would screen out of conformity analysis. As presented in Table 3.3-3, the western area of the MDAQMD where the Project is located is severe non-attainment for federal ozone, and moderate non-attainment for federal PM10. On the basis of those attainment designations, the Project would screen-out of conformity analysis if:

- NOx and VOC emissions are less than 25 tons per year each; and
- PM10 emissions are less than 100 tons per year; and
- Emissions are less than 10% of the non-attainment area emissions inventory.

Federal Conformity
As discussed in Section 3.3.2, Federal conformity analysis is not required provided that:

- NOx and VOC emissions are less than 25 tons per year each; and
- PM\(_{10}\) emissions are less than 100 tons per year; and
- Emissions are less than 10% of the non-attainment area emissions inventory.

The Project emits 1.27 tons per year of VOC (i.e. ROG), 23.9 tons per year of NOx, and 34.3 tons per year of PM\(_{10}\). Thus, VOC, NOx, and PM\(_{10}\) emissions are each less than the Federal conformity screening threshold identified for determining if a Federal conformity analysis would be required.

In 2010, sources within San Bernardino portion of the Mojave Desert Air Basin (CARB 2009 Almanac) emitted NOx and PM\(_{10}\) in the amounts of 55,125 tons per year and 43,646 tons per year, respectively. The Project increment represents 0.043% of the NOx emissions and 0.055% of the PM\(_{10}\) emissions in the region. The standard is to evaluate the emissions inventory within the non-attainment area. However, those emissions were not readily available. The Project may represent a somewhat higher percentage of the total emissions within the Western Mojave Desert Ozone Non-Attainment Area and/or the “portion of MDAQMD outside of Southeast Desert Modified AQMA.” However, it is unlikely that the emissions would exceed 10% in any case.

--- END OF REVISION ---

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.0.1 Introduction
This Section describes the resource areas (values) potentially impacted by the Project and other alternatives, and the potential environmental consequences on the physical, biological and social environments of these areas. Environmental consequences are described in terms of short and long-term, direct and indirect and cumulative impacts. Effects and impacts as utilized in this document are synonymous and could be beneficial or detrimental.

3.0.1.1 Resource Areas Evaluated

As a result of the scoping process and Initial Study, some resource areas and potential environmental impacts are not discussed or not discussed in detail in this Section. This is because potential impacts to these areas were found to have no impact or to be less than significant. The CEQ regulations (40 CFR 1500.4) state:

*Agencies shall reduce excessive paperwork by …. Discussing only briefly issues other than significant ones ... Using the scoping process not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the EIS process accordingly ...*

Also in 40 CFR 1501.7:

*Identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review, narrowing the discussion of these issues to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere.*

The CEQA Guidelines Section 15063 state:

*The purpose of the Initial Study is to: ... assist the preparation of an EIR ... by focusing the EIR on the effects determined to be significant, identifying the effects determined not to be significant, explaining the reasons for determining that potentially significant effects would not be significant ...*

The following resource areas are not discussed this DEIR/EIS:

- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation;
- Transportation and Traffic; and
- Utilities and Service Systems.
Although the Initial Study and scoping process concluded that there would be no impact or a less than significant impact to the following resource areas, due to potential public interest they are briefly discussed in this DEIR/EIS:

- Agriculture and Forestry;
- Cultural Resources;
- Hazards and Hazardous Materials; and
- Noise.

3.0.1.2 Types and Significance of Impacts

Under CEQA, lead agencies must identify the existing physical environment (i.e., the baseline set of environmental conditions) against which to compare a project’s expected impacts, in order to determine whether a project impacts are “significant.” This is done by measuring the increment between existing pre-project and likely post-project environmental conditions.

CEQA Guidelines generally define the baseline as the physical conditions in existence when the NOP is published. This is problematic for certain types of existing uses that fluctuate in intensity due to market demands, such as mining projects. Courts have recognized that there may be instances in which calculating the baseline on the date of the NOP does not capture the true pre-project conditions. For this Project, due to the economic downturn during the time that the NOP was published, the baseline used for the analyses in the DEIR/EIS is defined as those conditions that existed during a more representative period. The baseline was determined to be the conditions during the years 2004 through 2006.

CEQA also states in Section 15064 that in evaluating significance of the environmental effect of a project, the lead agency shall consider direct and indirect physical changes that are reasonably foreseeable. A direct physical change is a physical change in the environment which is caused by and immediately related to the project. It would occur at or near the time and place of the action. An indirect physical change is a physical change which is not immediately related to the project, but which is caused indirectly by the project. If a direct change in turn causes another change in the environment, then the other change is an indirect change. An indirect change may occur sometime later or at some distance from the action.

The Forest Service Handbook Section 1909.15 also states that the discussion on environmental consequences should include the relationship between short-term uses of the environment and the maintenance and enhancement of long-term uses, as well as evaluating both direct and indirect effects.

Cumulative impacts are those effects resulting from the incremental impacts of an action when added to other past, present or reasonably foreseeable future actions. Cumulative impacts could result from individually insignificant but collectively significant actions taking place over a period of time.

The impact analysis evaluates the environmental consequences or impacts expected to occur as a result of implementing the Project as described in Section 2. An impact would occur if the Project would
significantly affect the quality of the environment. Significance threshold criteria have been identified based on the Environmental Checklist found in the CEQA Guidelines Appendix G, as well as other applicable criteria developed from relevant rules, regulations and/or policies. Under NEPA, significance is determined by considering the context and intensity of the action and its effects. Context relates to the environmental circumstances at the location of the impact and in the immediate vicinity, as well as other interests that are potentially affected. Intensity refers to the severity or extent of the impact or magnitude of change from existing conditions. Each resource section has Significance Criteria specific to the affected environment being evaluated.

To provide a clear classification of impacts, this DEIR/EIS defined the following types of impacts:

**Significant and Unavoidable Impact:** A significant impact includes effects that exceed the thresholds based on the criteria established for evaluation. For example, air emissions that exceed the MDAQMD air quality significance thresholds.

**Potentially Significant Impact:** A potentially significant impact includes effects that may be significant but there is insufficient information to verify the magnitude of the effect.

**Less Than Significant Impact:** A less than significant impact includes effects that are perceptible, but do not exceed established or defined thresholds.

**Less Than Significant Impact with Mitigation:** A less than significant impact with mitigation indicates that the effects of a significant or potentially significant impact have been reduced below established thresholds through the implementation of specific mitigation measures.

**No Impact:** A proposed action with no impact will have no perceptible effect on the resources in question.

### 3.0.1.3 Past, Present, and Foreseeable Projects

CEQA Guidelines Section 15130(e) requires a discussion of cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” The CEQA Guidelines Section 15355, defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Cumulatively considerable impacts are defined in Section 15065(c) of the CEQA Guidelines as the “incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” Section 15130(b) of the CEQA Guidelines states, “[t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.”

Federal Regulations that guide NEPA define a cumulative impact as the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably
foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 Code of Federal Regulations [CFR] 1508.7).

To analyze the cumulative impacts of all Project alternatives, an area of analysis with similar resources as the Project Site was identified. The area of analysis used for the cumulative impacts evaluation for this Project was composed of the SBNF’s Desert Rim Place and Big Bear Backcountry Place, and the non-urban areas of Lucerne Valley. For the air quality assessment, the Mojave Desert Air Basin was also included in the cumulative analysis. Table 3.0-2 lists relevant past, present, and reasonably foreseeable actions within the area of analysis. Figure 3.0-1 provides a map of the location of these projects. A discussion is included in the environmental consequences section of each resource/issue area regarding the cumulative impacts that would result from the implementation of Project alternatives and past, present, and foreseeable actions.

### Table 3.0-2  Past, Present and Foreseeable Projects

<table>
<thead>
<tr>
<th>Map #</th>
<th>Project Name</th>
<th>Project Information</th>
<th>Location</th>
<th>Resource Areas Potentially Impacted</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lucerne Valley Solar One</td>
<td>Solar energy project, to develop a 20 megawatt solar energy facility. Total project size is 190 acres.</td>
<td>Lucerne Valley/San Bernardino County</td>
<td>Biology</td>
</tr>
<tr>
<td>2</td>
<td>Camp Rock 20-Acre Solar Farm</td>
<td>Solar energy project, to develop a 4 megawatt solar energy facility. Total project size is 20 acres.</td>
<td>Joshua Tree/San Bernardino County</td>
<td>Biology</td>
</tr>
<tr>
<td>3</td>
<td>Mitsubishi Cement Corporation (MCC) South Quarry</td>
<td>Approved Conditional Use Permit and Plan of Operations for a new limestone quarry to the south of the existing MCC East Pit and cement plant. Total project is 153.6 acres consisting of a 128 acre quarry, 2.7 acre landscape berm, 22 acre haul road. The West Pit is under development.</td>
<td>Lucerne Valley/San Bernardino National Forest</td>
<td>Aesthetics</td>
</tr>
<tr>
<td>4</td>
<td>White Knob/White Ridge Limestone Quarries Expansion Project</td>
<td>Approved Condition Use Permit and Amended Mine Reclamation Plan for an expansion of the existing White Knob/White Ridge Limestone Quarries. Proposed expansion is 190 acres for a total new project area of 335.1 acres.</td>
<td>San Bernardino Mountains</td>
<td>Aesthetics</td>
</tr>
<tr>
<td>5</td>
<td>Baldwin Lake Hazardous Fuels Reduction</td>
<td>Hazardous fuel reduction project on 5,300 acres.</td>
<td>Baldwin Lake, Erwin Lake, and Lake William</td>
<td>None</td>
</tr>
<tr>
<td>Map #</td>
<td>Project Name</td>
<td>Project Information</td>
<td>Location</td>
<td>Resource Areas Potentially Impacted</td>
</tr>
<tr>
<td>-------</td>
<td>--------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>6</td>
<td>North Big Bear Hazardous Fuels Reduction Project</td>
<td>Hazardous fuel reduction project on 3,894 acres total. 2,271 acres (Defense Zone), 347 acres (Bertha Ridge Fuelbreak), and 1,276 (Threat Zone).</td>
<td>North side of Big Bear Lake from Big Bear Dam east to Baldwin Lake and over the ridge to Holcomb Valley.</td>
<td>None</td>
</tr>
<tr>
<td>7</td>
<td>Chevron Energy Solutions Lucerne Valley Solar Project</td>
<td>Solar energy project, to develop solar PV plant capable of generating 45 megawatts. Total project size is 516 acres.</td>
<td>Lucerne Valley</td>
<td>None</td>
</tr>
</tbody>
</table>
3.0 REVISIONS AND CORRECTIONS TO THE DRAFT EIR/EIS

Butterfield-Sentinel Final EIR/EIS

December 2019

3-37

OM01_Final_EIR-EIS_December 2019.docx

Figure 3.0-1 Location of Past, Present, and Foreseeable Projects

MAP KEY:

🌟 Omaya Butterfield and Sentinel Project

#1 – Lucerne Valley Solar One
#2 – Camp Rock 20-Acre Solar Farm
#3 – Mitsubishi Cement Corp (MCC)
#4 – White Knob/White Ridge Limestone Quarries Expansion Project
#5 – Baldwin Lake Hazardous Fuels Reduction
#6 – North Big Bear Hazardous Fuels Reduction Project
#7 – Chevron Energy Solutions Lucerne Valley Solar Project
3.1.4 Draft EIR/EIS Section 3.4, Biological Resources (Pages 3.4-103)

Explanation

In response to Draft EIR/EIS comments provided by the Conservation Groups, the NEPA cumulative analysis has been revised to be consistent with the evaluation within the Biological Resources section of the Draft EIR/EIS. Specifically, it was clarified that with the implementation of North Slope Bighorn Sheep Conservation Strategy, potential cumulative impacts to the Nelson’s bighorn sheep would be less than significant. Therefore, the following revisions have been made to Section 3.4 of the Draft EIR/EIS.

– REVISION –

NEPA Cumulative Analysis Finding

For the majority of the species addressed, the overall cumulative impacts for the proposed Project are therefore considered less than significant. The exception is the potential cumulative effects to the Cushenbury herd of Nelson’s bighorn sheep. With the implementation of the North Bighorn Sheep Conservation Strategy, the SBNF considers potential cumulative effects to the Cushenbury herd of Nelson’s bighorn sheep to be even less than significant after implementation of the identified mitigation measures and Project design features.

– END OF REVISION –

3.2 Corrections

The following corrections are provided for the text of the Omya Butterfield-Sentinel Draft EIR/EIS. Amended text is identified by page number. Corrections to the Draft EIR/EIS text are shown with underlining and text removed from the Draft EIR/EIS is shown with strikethrough.

3.2.1 Draft EIR/EIS Section 3.4, Biological Resources (Pages 3.4-6 and 9)

Explanation

In response to Draft EIR/EIS comments provided by the Conservation Groups, corrections were made to Section 3.4, Biological Resources, in the Draft EIR/EIS. Specifically, the comment noted that there are several RCAs in and around the Project site; therefore, the Forest Service should implement the Forest Service’s Five-step Project Screening Process for RCAs.

The RCAs that were identified in Figure 3.4-2 in the Draft EIR/EIS were based on modeled information. Since that time field work has been conducted by the Forest Service and based on actual observations it was determined that these areas were not properly identified in the model and are in fact ephemeral drainages and not subject to the management provisions that apply to RCAs. As such, the discussion of RCAs and Figure 3.4-2 have been removed from the Draft EIR/EIS.
Riparian Conservation Areas

Riparian Conservation Areas (RCAs) are areas defined by SBNF to provide for management of riparian resources. They are areas that consist of geographically distinct resource values and characteristics, which are composed of aquatic and riparian resources, floodplains, and wetlands. They include, but are not limited to, meadows, all areas within a horizontal distance of 328 feet (100 meters) from the edge of perennial streams, and lakes/reservoirs or within approximately 98 feet (30 meters) of the edge of seasonally flowing/intermittent streams. There are several RCAs within or adjacent to the Project Area as shown on Figure 3.4-2. The Forest Service has conducted field work and based on actual observations it was determined that these areas were not properly identified in the model and are in fact ephemeral drainages and not subject to the management provisions that apply to RCAs.
Figure 3.4-2 Streams and Riparian Conservation Areas

Source: SBNF, 2016
3.2.2 Draft EIR/EIS Section 3.4, Biological Resources (Pages 3.4-40)

Explanation

In response to Draft EIR/EIS comments provided by the Conservation Groups, clarifications were made to Mitigation Measure (MM) BIO-6 in Draft EIR/EIS Section 3.4, Biological Resources. Specifically, the comment noted that MM BIO-6 required that wildlife and plant awareness training will be implemented. The concern was that this training should already be ongoing at a mining operation, and if the training is already occurring it is unclear how the mitigation measure would actually further mitigate the potential impacts. Wildlife and plant awareness training for employees already occurs at the Project site. Therefore, to address this comment, MM BIO-6 has been revised as shown below to clarify that employee training will be “continued” and updated as necessary to reflect current conditions and requirements as well the effectiveness of the training in order to identify any areas of improvement.

– CORRECTION –

Mitigation Measure BIO-6: Wildlife and Plant Awareness Training

Omya shall continue to conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will address bighorn sheep, desert tortoise, raptors, other animals of the area, and rare plants. This will include the importance of avoiding harassment/disturbance, adherence to speed limits, adherence to defined project boundaries, reporting guidelines, etc. CDFW and USFS will provide assistance in developing the training program. (SBNF Biological Report GEN-2)

– END OF CORRECTION –

3.2.3 Draft EIR/EIS Section 3.4, Biological Resources (Pages 3.3-43)

Explanation

In response to Draft EIR/EIS comments provided by the Conservation Groups, clarifications were made to Mitigation Measure (MM) BIO-17 in Draft EIR/EIS Section 3.0. Specifically, the comment noted that MM BIO-17 required that any bighorn sheep mortalities, whatever the cause, be reported to the CDFW and Forest Service as soon as possible after the observation. The concern was that this reporting should already be ongoing at the existing mining operation, and if the reporting is already occurring it is unclear how the mitigation measure would actually further mitigate the potential impacts. It is true that reporting is already being conducted. Therefore, to address this comment, MM BIO-17 has been revised to state that the reporting requirement will be “continued” and updated as necessary to reflect current conditions and requirements as well the effectiveness of the training in order to identify any areas of improvement.

– END OF CORRECTION –
– CORRECTION –

Mitigation Measure BIO-17: Bighorn Sheep Reporting of Mortality

Omya shall continue to immediately report any bighorn sheep mortalities, whatever the cause, to the CDFW and Forest Service as soon as possible after the observation. The bighorn sheep carcass shall be left in place until the CDFW or Forest Service biologist can examine it and determine the proper disposal method. In the event that mountain lion predation is occurring at levels that compromise the viability of the population, Omya shall cooperate fully by ensuring access to Omya properties to determine the predator involved or, in the event that an individual predator has been identified, for removal of the predator. (SBNF Biological Report PDF BHS-2)

– END OF CORRECTION –
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4.0 MITIGATION MONITORING AND REPORTING PLAN

CEQA Section 21081.6 requires adoption of a Mitigation Monitoring and Reporting Plan (MMRP) for those measures or conditions placed on the Project to mitigate or avoid adverse effects on the environment. The law states that the MMRP shall be designed to ensure compliance during Project implementation. When implemented, environmental effects associated with the Project will be reduced or eliminated.

NEPA Section 1505.3 also requires that the federal Lead Agency provide for monitoring to assure that mitigations and other conditions established in the Draft EIR/EIS, during the public review period, or otherwise committed to as part of the Lead Agency decision shall be implemented. The MMRP has been prepared to address these NEPA requirements and ensure compliance during Project implementation.

The MMRP has been prepared as a matrix containing the following elements:

- Measures that would mitigate significant impacts on the environment are recorded with the action and the procedure necessary to ensure compliance.
- A procedure of compliance and verification is outlined for each measure. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
- The MMRP is designed to provide focused, yet flexible guidelines. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the MMRP.

The MMRP will be in place through all phases of the Project. The Forest Service coordinator, assigned to the Project and the County planner, assigned to the Project, shall coordinate enforcement of the MMRP and oversee it to ensure that proper action is taken on each mitigation measure. Each applicable Forest Service and County department or division shall ensure compliance of the conditions (mitigations) that relate to that particular Forest Service and County department.

The Project planners or responsible Forest Service and County departments have the authority to stop the work of the operator if compliance with aspects of the MMRP are not occurring after written notification has been issued. The Project planners or responsible Forest Service and County departments also have the authority to deny entry into a new mining phase until compliance with a mitigation measure occurs.
### Table 4-1  Mitigation Monitoring and Condition Compliance Program

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Mitigation Measures</th>
<th>Compliance/Monitoring Procedure</th>
<th>Responsible Department</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AIR QUALITY</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact AQ-2:</strong> Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td><strong>Mitigation Measure AQ-1: Dust Control – Unpaved Roads:</strong> Unpaved roads shall be controlled by at least 80% using methods that are consistent with Mojave Desert Air Quality Management District (MDAQMD) guidance.</td>
<td>AQ-1: Compliance shall be verified through annual County mine inspections and periodic MDAQMD site inspections. In addition, documentation demonstrating compliance with the identified unpaved road requirements shall be maintained onsite and provided to the Forest Service, County, and MDAQMD upon request.</td>
<td>San Bernardino County, Land Use Servicers Department, Planning Division U.S. Department of Agriculture, Forest Service, San Bernardino National Forest Mojave Desert Air Quality Management District</td>
</tr>
<tr>
<td><strong>Impact AQ-2:</strong> Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td><strong>Mitigation Measure AQ-2: Dust Control – Grading:</strong> Areas to be graded and where bulldozer operates shall controlled by at least 85% using methods that are consistent with MDAQMD guidance.</td>
<td>AQ-2: Compliance shall be verified through annual County mine inspections and periodic MDAQMD site inspections. In addition, documentation demonstrating compliance with the identified grading and bulldozer requirements shall be maintained onsite and provided to the Forest Service, County, and MDAQMD upon request.</td>
<td>San Bernardino County, Land Use Servicers Department, Planning Division U.S. Department of Agriculture, Forest Service, San Bernardino National Forest Mojave Desert Air Quality Management District</td>
</tr>
<tr>
<td><strong>Impact AQ-4:</strong> Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</td>
<td><strong>Mitigation Measures AQ-1 and AQ-2</strong></td>
<td>AQ-1 and AQ-2: Compliance shall be verified through annual County mine inspections and periodic MDAQMD site inspections. In addition, documentation demonstrating compliance with the identified unpaved road and grading/bulldozer requirements shall be maintained onsite and provided to the Forest Service, County, and MDAQMD upon request.</td>
<td>San Bernardino County, Land Use Servicers Department, Planning Division U.S. Department of Agriculture, Forest Service, San Bernardino National Forest Mojave Desert Air Quality Management District</td>
</tr>
<tr>
<td><strong>BIOLOGICAL RESOURCES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact BIO-1:</strong> Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
<td>See Below</td>
<td>See Below</td>
<td>See Below</td>
</tr>
<tr>
<td>Impact BIO-1a: Threatened and Endangered Plants Species</td>
<td>Mitigation Measure BIO-1: Relinquish Mining Claims:</td>
<td>BIO-1: Documentation demonstrating relinquishment of identified unpatented mining claims shall be maintained onsite and provided to the Forest Service, County, and other relevant agencies upon request.</td>
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<td>---------------------------------------------------</td>
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</tr>
<tr>
<td>Omya shall relinquish through a quit-claim process, the identified acreage located within the unpatented mining claims as shown in Table 3.4-3 in the Draft EIR/EIS.</td>
<td>These areas have been verified by the SBNF to contain habitat for the specified endangered or threatened species pursuant to the CHMS. Table 3.4-6 in the Draft EIR/EIS identifies the number of acres in the Project and mitigation parcels for each T/E plant species. Mitigation for affected T/E plants is a minimum of 3:1 based on conservation value (as described in the CHMS). (SBNF Biological Report PDF CARB-1 and 2)</td>
<td>BIO-2: Qualified revegetation specialist/botanists shall conduct non-native invasive plants visual inspections during revegetation monitoring.</td>
<td></td>
</tr>
<tr>
<td>Omya shall relinquish through a quit-claim process, the identified acreage located within the unpatented mining claims as shown in Table 3.4-3 in the Draft EIR/EIS.</td>
<td>Omya shall visually monitor the occurrence of non-native invasive plants on-site by visual inspection. The goal is to prevent non-native invasive plants from becoming established and depositing seeds in areas to be re-vegetated at a later date. If inspections reveal that weeds are becoming an issue or have established on-site, then removal would be initiated by Omya in coordination with the Forest Service botanist.</td>
<td>If inspections reveal that weeds are becoming an issue or have established on-site, then removal would be initiated by Omya in coordination with the Forest Service botanist.</td>
<td></td>
</tr>
<tr>
<td>If inspections reveal that weeds are becoming an issue or have established on-site, then removal would be initiated by Omya in coordination with the Forest Service botanist.</td>
<td>Omya shall utilize Forest Service-approved vehicle and equipment cleaning procedures/standards prior to using the vehicle or equipment in the National Forest System.</td>
<td>Compliance shall be demonstrated and verified through annual County mine inspections. Per the Amended Plan of Operations &amp; Reclamation Plan, reports of inspections and weed control implementation shall be part of the annual monitoring report prepared and submitted to the Forest Service, County, and California Department of Conservation.</td>
<td></td>
</tr>
<tr>
<td>Omya shall be responsible for funding detection, control, and eradication efforts.</td>
<td>Omya personnel will be trained and will report sightings of domestic sheep, goats, dogs, and cats on and near the facility to the Forest Service and CDFW within two hours of the observation. In the event of domestic or feral animals being found, Omya shall employ a trained trapper to catch and remove the animals following County regulations. CDFW may assist capture/removal efforts if available. (SBNF Biological Report PDF NNS-4)</td>
<td>In addition, documentation demonstrating compliance with the identified non-native invasive plants requirements shall be maintained onsite and provided to the Forest Service, CDFW, and County upon request.</td>
<td></td>
</tr>
<tr>
<td>Omya shall be responsible for funding detection, control, and eradication efforts.</td>
<td>Omya personnel will be trained and will report sightings of domestic sheep, goats, dogs, and cats on and near the facility to the Forest Service and CDFW within two hours of the observation. In the event of domestic or feral animals being found, Omya shall employ a trained trapper to catch and remove the animals following County regulations. CDFW may assist capture/removal efforts if available. (SBNF Biological Report PDF NNS-4)</td>
<td>BIO-3: Omya will utilize Forest Service-approved vehicle and equipment cleaning procedures/standards prior to using the vehicle or equipment in the National Forest System. Compliance shall be demonstrated and verified through County, Forest Service, and/or CDFW inspections.</td>
<td></td>
</tr>
<tr>
<td>Omya personnel will be trained and will report sightings of domestic sheep, goats, dogs, and cats on and near the facility to the Forest Service and CDFW within two hours of the observation. In the event of domestic or feral animals being found, Omya shall employ a trained trapper to catch and remove the animals following County regulations. CDFW may assist capture/removal efforts if available. (SBNF Biological Report PDF NNS-4)</td>
<td></td>
<td>In addition, documentation demonstrating compliance with the identified equipment cleaning requirements shall be maintained onsite and provided to the Forest Service, CDFW, and County upon request.</td>
<td></td>
</tr>
<tr>
<td>Mitigation Measure BIO-6: Wildlife and Plant Awareness:</td>
<td>BIO-4:</td>
<td></td>
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<td>Omya shall continue to conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will address bighorn sheep, desert tortoise, raptors, other animals of the area, and rare plants. This will include the importance of avoiding harassment/disturbance, adherence to speed limits, adherence to defined project boundaries, reporting guidelines, etc. CDFW and USFS will provide assistance in developing the training program. (SBNF Biological Report GEN-2)</td>
<td>Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will instruct employees on how to properly identify potential non-native invasive plants, animals, or pathogens. CDFW and USFWS will provide assistance in developing the training program and will help Omya will develop measures for detection, control, and eradication as necessary. The CDFW and USFWS will also provide consultation if Omya detects and reports a potential new non-native invasive plants, animals, or pathogens. Omya shall be responsible for funding detection, control, and eradication efforts for new non-native invasive species.</td>
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<tr>
<td>BIO-4: Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will instruct employees on how to properly identify potential non-native invasive plants, animals, or pathogens. CDFW and USFWS will provide assistance in developing the training program and will help Omya will develop measures for detection, control, and eradication as necessary. The CDFW and USFWS will also provide consultation if Omya detects and reports a potential new non-native invasive plants, animals, or pathogens. Omya shall be responsible for funding detection, control, and eradication efforts for new non-native invasive species.</td>
<td>Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will also address sightings of domestic sheep, goats, dogs, and cats on and near the facility and how properly report sightings of domestic and feral animals to the Forest Service and CDFW within two hours of the observation. CDFW and USFWS will provide assistance in developing the training program, as needed.</td>
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<tr>
<td>In the event of domestic or feral animals being found, Omya shall employ a trained trapper to catch and remove the animals following County regulations. CDFW may assist capture/removal efforts if available.</td>
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<td>In addition, documentation demonstrating compliance with the identified domestic and feral animal training and reporting requirements shall be maintained onsite and provided to the Forest Service, County, CDFW, and USFWS upon request.</td>
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<tr>
<td>BIO-6:</td>
<td>Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will address bighorn sheep, desert tortoise, raptors, other animals of the area, and rare plants. This will include the importance of avoiding harassment/disturbance, adherence to speed limits, adherence to defined project boundaries, reporting guidelines, etc. CDFW and USFWS will provide assistance in developing the training program, as needed. In addition, documentation demonstrating compliance with the identified employee wildlife/plant awareness and training program requirements shall be maintained onsite and provided to the Forest Service, County, CDFW, and USFWS upon request.</td>
<td>See Below</td>
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<tr>
<td>Impact BIO-1b: Threatened and Endangered Animal Species</td>
<td>See Below</td>
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**See Below**
<table>
<thead>
<tr>
<th>California Condor (<em>Gymnogyps californianus</em>)</th>
<th>Mitigation Measure BIO-1, and the following:</th>
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</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure BIO-7: Raptor Conservation Strategy (RCS):</strong></td>
<td>A RCS shall be developed in coordination with the Forest Service, USFWS, and CDFW. Omya shall provide input to the development/finalization of the RCS and shall follow the guidelines put forth in the effort. The RCS will be tailored for activities associated with mining activities and effects. Upon approval of the Plan of Operations and the Reclamation Plan by the County and the Forest Service, Omya will participate in the implementation of the strategy by contributing to specified survey and monitoring efforts and by following applicable operation guidelines.</td>
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<tr>
<td>The RCS will cover the North Slope of the San Bernardino Mountains from the White Mountain to Terrace Springs, and will address golden eagles, California condor, peregrine falcon, and prairie falcon. The RCS may be updated to include other raptors in the future if concerns develop over their local population status.</td>
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<td>The RCS will be a dynamic document and will be updated as new data and scientific understanding of the aforementioned species become available. It will include monitoring and information gathering and measures to avoid, minimize, rectify, and reduce (or eliminate over time) effects to raptors nesting on the North Slope. The intent is to use systematic monitoring or raptor nesting chronology and observed behavior to develop site- and activity- specific measures to ensure successful nesting and provide for adaptive management opportunities. (SBNF Biological Report PDF RAPTOR-1)</td>
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<td><strong>Mitigation Measure BIO-8: Raptor Monitoring:</strong></td>
<td>If an occupied raptor nest is located within 1.5 miles of the active mining area, the mining company shall provide a qualified biologist to monitor during blasting for disturbance as a result of the mining activities. Monitoring results will be provided to the Forest Service biologist via email within 48 hours of a blast. The Forest Service will coordinate appropriate notification, as necessary, with USFWS and CDFW. (SBNF Biological Report PDF RAPTOR-1)</td>
</tr>
<tr>
<td><strong>Mitigation Measure BIO-9: Raptor Nesting Regulatory Coordination:</strong></td>
<td>If an occupied nest for a Federally or State protected species is found within 1.5 miles of an active quarry operation, the SBNF shall conduct an evaluation to determine the appropriate course of action under applicable State and Federal laws (e.g. &quot;incidental take&quot; authorization, Endangered Species Consultation) (SBNF Biological Report PDF RAPTOR-2)</td>
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<tr>
<td><strong>SBNF Biological Report PDF RAPTOR-1:</strong></td>
<td>San Bernardino County, Land Use Servicers Department, Planning Division</td>
</tr>
<tr>
<td><strong>SBNF Biological Report PDF RAPTOR-2:</strong></td>
<td>U.S. Department of Agriculture, Forest Service, San Bernardino National Forest</td>
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<tr>
<td><strong>SBNF Biological Report PDF RAPTOR-1:</strong></td>
<td>California Department of Conservation, Division of Mine Reclamation</td>
</tr>
<tr>
<td><strong>SBNF Biological Report PDF RAPTOR-2:</strong></td>
<td>California Department of Fish and Wildlife</td>
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<td><strong>SBNF Biological Report PDF RAPTOR-1:</strong></td>
<td>United States Fish and Wildlife Service</td>
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<tr>
<td>Environmental Impact</td>
<td>Mitigation Measures</td>
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<tr>
<td>Mitigation Measure BIO-10: Raptor Nesting Protection:</td>
<td>If monitoring detects that blasting or other mine activities are resulting in disturbance of nesting raptors that could lead to mortality or nest abandonment, the Forest Service, Omya, USFWS and CDFW, as appropriate, shall evaluate the feasibility of implementing measures to avoid or reduce the effects. The RCS will contain some potential methods for reducing or avoiding effects. (SBNF Biological Report PDF RAPTOR-3)</td>
</tr>
<tr>
<td>BIO-9:</td>
<td>Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program shall also address sightings of occupied raptor nests on or near the facility and how properly report to the Forest Service and CDFW. CDFW and USFS shall provide assistance in developing the training program, as needed.</td>
</tr>
<tr>
<td>BIO-10:</td>
<td>If Omya employees discover a potential raptors nest on or near the facility, a qualified biologist shall conduct pre-construction surveys for nesting raptors and oversee avoidance of active nests during mining activities.</td>
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</table>
### Environmental Impact

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Mitigation Measures</th>
<th>Compliance/Monitoring Procedure</th>
<th>Responsible Department</th>
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</thead>
<tbody>
<tr>
<td>Desert Tortoise (<em>Gopherus agassizii</em>)</td>
<td><strong>Mitigation Measure BIO-11: Personnel Training – Desert Tortoise:</strong> Omya shall work with the SBNF and CDFW and incorporate desert tortoise education and awareness into their training for employees, customers, and contractors. This shall include how to minimize impacts to desert tortoises and their habitats. Information about penalties shall also be included. These briefings shall include guidelines about driving in desert tortoise habitat, handling prohibitions, etc. Omya shall work with SBNF and CDFW to develop other protective measures if monitoring identifies a need. (SBNF Biological Report PDF DETO-1)</td>
<td><strong>BIO-11:</strong> Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program shall also incorporate desert tortoise education, including how to minimize impacts to their habitats and their habitats. The training shall also include information about potential penalties if desert tortoises are impacts, guidelines about driving in desert tortoise habitat, handling prohibitions, etc. CDFW and USFS shall provide assistance in developing the training program, as needed. In addition, documentation demonstrating compliance with the identified desert tortoise employee awareness program requirements shall be maintained onsite and provided to the Forest Service, County, CDFW, and USFWS upon request.</td>
<td>San Bernardino County, Land Use Servicers Department, Planning Division</td>
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<td></td>
<td><strong>Mitigation Measure BIO-12: Desert Tortoise Reporting:</strong> Any sightings of desert tortoises, including dead tortoises, must be reported to the Forest Service biologist. The report should include photos if possible, location, date, time, cause of death (if obvious), and any other pertinent information. (SBNF Biological Report PDF DETO-2)</td>
<td><strong>BIO-12:</strong> If Omya employees discover a desert tortoise, including dead tortoises, on or near the facility, the sighting shall be documented and reported to the Forest Service biologist. The report of the sighting shall include photos of the desert tortoise species and documentation of the location, date, time, cause of death (if obvious), and any other pertinent information. In addition, documentation demonstrating compliance with the identified desert tortoise reporting requirements will be maintained onsite and provided to the Forest Service, CDFW, and County upon request.</td>
<td>U.S. Department of Agriculture, Forest Service, San Bernardino National Forest</td>
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<tr>
<td>Southern Rubber Boa (<em>Charina bottae umbratica</em>)</td>
<td><strong>Mitigation Measures BIO-1 and BIO-6</strong></td>
<td><strong>See Above</strong></td>
<td>California Department of Fish and Wildlife</td>
</tr>
<tr>
<td><strong>Impact BIO-1c:</strong> Other Special Status Species – Plants</td>
<td><strong>See Below</strong></td>
<td><strong>See Below</strong></td>
<td>United States Fish and Wildlife Service</td>
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<tr>
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<td>Coville’s Dwarf Abronia (Abronia nana var. covillei), Crested Milkvetch (Astragalus bicristatus), Bear Valley Milkvetch (Astragalus lentiginosus var. sierra), Parish’s Rock Cress (Boechera parishii), Shockley’s Rock Cress (Boechera shockleyi), Parish’s Rock Cress (Boechera parishii), Bear Valley Phlox (Phlox dolichantha)</td>
<td>Mitigation Measures BIO-1</td>
<td>See Above</td>
<td>See Above</td>
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<tr>
<td>Impact BIO-1d: Other Special Status Species - Amphibians and Reptiles</td>
<td>See Below</td>
<td>See Below</td>
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<tr>
<td>Southern Rubber Boa (Charina bottae umbratica), Large-Blotched Ensatina (Ensatina klauberi), Yellow-Blotched Ensatina (Ensatina eschscholtzii), Southern California Legless Lizard (Anniella stebbinsi), Northern Three-Lined Boa (Lichanura arcuri), San Bernardino Ringneck Snake (Diadophis punctatus modestus), San Bernardino Mountain Kingsnake (Lampropeltis zonata parvuligera), Two-Striped Garter Snake (Thamnophis hammondii), Coast Patch-Nosed Snake (Salvadora hexalepis virgultea)</td>
<td>Mitigation Measures BIO-1 and BIO-6</td>
<td>See Above</td>
<td>See Above</td>
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### Impact BIO-1e: Other Special Status Species – Birds

#### Mitigation Measure BIO-1, BIO-6, and the following:

**Mitigation Measure BIO-13:**

Ground Clearing: During the development of the quarry and associated facilities, all initial ground clearing (vegetation removal, grading, etc.) shall ideally occur outside the avian breeding season, and potential nesting habitat shall not be removed from February 1 through August 31, or appropriate dates based on on-site nesting phenology determined by a qualified biologist.

For initial ground clearing (vegetation removal, grading, etc.) that is not feasible to be conducted outside the nesting season, surveys shall be conducted to locate active nests. Any active nest sites that are located shall be buffered and no work shall be conducted within those buffered areas until the nests are no longer active. The buffer distances would be determined by current species-specific standards. (SBNF Biological Report PDF BIRD-1)

**Mitigation Measure BIO-14: Nesting Surveys:**

Nesting bird surveys for passerine birds, as outlined under MM BIO-13, guidelines area as follows:

- A qualified biologist shall be experienced and familiar with robust nest-locating techniques or comparable to those described by Martin and Guepel (1993).
- Surveys shall be conducted in accordance with the following guidelines:
  - Surveys shall cover all potential nesting habitat to be disturbed and a 500 foot buffer surrounding areas to be disturbed.
  - At least two pre-construction surveys, separated by a minimum 10 day interval, shall be completed prior to initial grading or grubbing activity; the later survey shall be completed no more than 10 days preceding initiation of initial grading or grubbing activity. Additional follow-up surveys shall be required if periods of construction inactivity exceed one week in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation. (SBNF Biological Report PDF BIRD-2)

**BIO-1 and BIO-6:**

See Above

**BIO-13 and BIO-14:**

Omya shall conduct all quarry development and construction activities, including tree removal/trimming, vegetation clearing, grading, grubbing, or blasting activities (collectively, “land clearing activities”), in such a way as to avoid nesting native and migratory birds. This shall be accomplished by implementing one of the following options:

- **Timing of construction:** Prohibit land clearing activities during the breeding and nesting season (February 1 – August 31), in which case the following surveys are not required; or

- **Surveys and avoidance of occupied nests:** Conduct site-specific surveys by a qualified biologist prior to land clearing activities during the breeding and nesting season (February 1 – August 31) and avoid occupied bird nests. Surveys shall be conducted to identify any occupied (active) bird nests in the area proposed for disturbance. Occupied nests shall be avoided until juvenile birds have vacated the nest.

Nesting bird surveys shall be conducted by a qualified, Forest Service-approved biologist who is familiar with the robust nest-locating techniques or comparable to those described by Martin and Guepel (1993).

An initial breeding and nesting bird survey shall be conducted 30 days prior to the initiation of land clearing activities. The site must be surveyed a minimum of two (2) times, separated by a minimum of 10 days. The last survey shall be completed no more than 10 days prior to the initiation of land clearing activities. Additional follow-up surveys shall be required if periods of construction inactivity exceed one (1) week in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation. The nesting bird survey must cover the development...
### Mitigation Measure BIO-15: Nesting Season – Crystal Creek Well:

To the greatest extent possible, maintenance activities at the Crystal Creek well and access road would be avoided during the nesting season for California spotted owl and other nesting birds (February 1 through August 15). Exceptions may be considered depending on planned activities and associated noise levels, after coordination with the Forest Service biologist or if protocol-level surveys determine the territory is vacant. If emergency repairs are required within the breeding season, the company shall notify the Forest Service within 24 hours. (SBNF Biological Report PDF CC-1)

If occupied (active) nests are found, land clearing activities within a setback area surrounding the nest shall be postponed or halted. Land clearing activities may commence in the setback area when the nest is vacated (juveniles have fledged) provided there is no evidence of a second attempt at nesting, as determined by the Forest Service-approved biologist. Land clearing activities can also occur outside of the setback areas. The required setback is 300-feet for most birds and 500-feet for raptors, as recommended by the CDFW. This setback can be increased or decreased based on the recommendation of the Forest Service-approved biologist in consultation and approval from the CDFW.

Compliance with the pre-construction nesting surveys shall be demonstrated and verified through County, Forest Service, and/or CDFW inspections.

In addition, documentation demonstrating compliance with the pre-construction nesting surveys requirements will be maintained onsite and provided to the Forest Service, CDFW, and County upon request.

### BIO-15:

To the greatest extent possible, Omya shall avoid conducting maintenance activities at the Crystal Creek well and access road during the nesting season for California spotted owl and other nesting birds (February 1 through August 15). If required during the nesting bird season, Omya shall contact the Forest Service biologist prior to initiating maintenance activities. Exceptions may be considered depending on planned activities and associated noise levels, only after coordination with the Forest Service biologist or if protocol-level surveys determine the territory is vacant. If emergency repairs are required within the breeding season, the company shall notify the Forest Service within 24-hours.
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<td>Compliance with the pre-construction nesting surveys shall be demonstrated and verified through County, Forest Service, and/or CDFW inspections. In addition, documentation demonstrating compliance with the pre-construction nesting surveys requirements will be maintained onsite and provided to the Forest Service, CDFW, and County upon request.</td>
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<td>California Spotted Owl (<em>Strix occidentalis occidentalis</em>)</td>
<td>Mitigation Measures BIO-6 and BIO-13 through BIO-15</td>
<td>See Above</td>
<td>See Above</td>
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<tr>
<td>Willow Flycatcher (<em>Empidonax traillii</em>)</td>
<td>Mitigation Measures BIO-6 and BIO-13 through BIO-15</td>
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<td>See Above</td>
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<td>Gray Vireo (<em>Vireo vicinior</em>)</td>
<td>Mitigation Measures BIO-6 and BIO-13 through BIO-15</td>
<td>See Above</td>
<td>See Above</td>
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<tr>
<td>Golden Eagle (<em>Aquila chrysaetos</em>)</td>
<td>Mitigation Measures BIO-1, BIO-6, BIO-7 through BIO-10, BIO-13 through BIO-15</td>
<td>See Above</td>
<td>See Above</td>
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<tr>
<td><strong>Impact BIO-1f:</strong> Other Special Status Species – Mammals</td>
<td>Mitigation Measures BIO-1</td>
<td>See Above</td>
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<tr>
<td>American Badger (<em>Taxidea taxus</em>)</td>
<td>Mitigation Measures BIO-1</td>
<td>See Above</td>
<td>See Above</td>
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</table>
Mitigation Measures BIO-1, BIO-6, and the following:

Mitigation Measure BIO-16: Bighorn Sheep Foraging Habitat:
When trucks spray water on haul roads to control fugitive dust, some overspray occurs on road berms for a short distance beyond. Those watered areas sometimes support vegetation that bighorn sheep consume. Omya will not make an effort to eliminate the overspray. The Project’s Revegetation Plan shall focus on using native species that will help enhance bighorn sheep habitat. (SBNF Biological Report PDF BHS-1)

Mitigation Measure BIO-17: Bighorn Sheep Reporting of Mortality:
Omya shall continue to immediately report any bighorn sheep mortalities, whatever the cause, to the CDFW and Forest Service as soon as possible after the observation. The bighorn sheep carcass shall be left in place until the CDFW or Forest Service biologist can examine it and determine the proper disposal method. In the event that mountain lion predation is occurring at levels that compromise the viability of the population, Omya shall cooperate fully by ensuring access to Omya properties to determine the predator involved or, in the event that an individual predator has been identified, for removal of the predator. (SBNF Biological Report PDF BHS-2)

Mitigation Measure BIO-18: Bighorn Sheep Monitoring/Adaptive Management:
Omya shall monitor bighorn sheep use in and near their operations and at water sources in and adjacent to their operations. Monitoring shall consist of maintenance of cameras stationed at water sources and recording of data from cameras in a database developed by CDFW, as well as collection of observations by Omya employees. An annual monitoring report will be provided to the Forest Service and CDFW. (SBNF Biological Report PDF BHS-3)

Mitigation Measure BIO-19: North Slope Bighorn Sheep Conservation Strategy: A Draft North Slope Bighorn Sheep Conservation Strategy will be developed by CDFW and the Forest Service which will include:
- Guidelines/thresholds for population status that would trigger augmentation of the herd;
- A strategy/guidelines for developing water sources to respond to drought years;
- Herd monitoring methodology and objectives.

Omya will be a partner in the North Slope Bighorn Sheep Conservation Strategy and will help support the long-term management goals of maintaining a sustainable population of bighorn sheep on the North Slope. (SBNF Biological Report PDF BHS-4)

BIO-1 and BIO-6:
See Above

BIO-16:
Omya shall not make an effort to eliminate overspray when using water on haul roads to control dust. Per the Amended Plan of Operations & Reclamation Plan, revegetation of the site shall be completed by a qualified revegetation specialist/botanist using locally native species that will help enhance bighorn sheep habitat. Reports of ongoing/completed revegetation efforts and related bighorn sheep habitat enhancement shall be part of the annual monitoring report submitted to the Forest Service and/or County.

In addition, documentation demonstrating compliance with the identified revegetation and related bighorn sheep habitat requirements shall be maintained onsite and provided to the Forest Service, CDFW, and County upon request.

BIO-17:
If a bighorn sheep mortality is observed on or near the facility, whatever the cause, the sighting shall be immediately reported to the CDFW and Forest Service as soon as possible after the observation. The bighorn sheep carcass shall be left in place until the CDFW or Forest Service biologist can examine it and determine the proper disposal method. If the CDFW or Forest Service biologist determines that mountain lion predation is potentially occurring at levels that compromise the viability of the affected bighorn sheep population, Omya shall cooperate fully by ensuring access to Omya properties to determine the predator involved or, in the event that an individual predator has been identified, for removal of the predator.

Compliance with the bighorn sheep mortality requirements and related surveys shall be demonstrated and verified through County, Forest Service, and/or CDFW inspections.
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<tr>
<th>Mitigation Measure BIO-20: Future Conservation and Management:</th>
<th>In addition, documentation demonstrating compliance with the bighorn sheep requirements will be maintained onsite and provided to the Forest Service, CDFW, and County upon request.</th>
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| Within one year after approval, Omya shall begin contributing to a non-wasting endowment, designated as the North Slope Bighorn Sheep Conservation Fund (Fund). The amount of Omya’s contributions shall be determined by CDFW in coordination with Omya. The Fund shall be administered by the National Fish and Wildlife Foundation as a sub-account of the California Department of Fish and Game (Game) Wildlife Master Mitigation Account. This sub-account shall be managed as a long-term endowment dedicated to activities that aid in conservation and monitoring of bighorn sheep both within the Cushenbury herd and on proximate habitats, occupied or unoccupied, including the Bighorn Mountains and San Gorgonio Wilderness where immigration and emigration may connect groups into a functional metapopulation. (SBNF Biological Report PDF BHS-5) | BIO-18:  
Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The training shall also include information on how to properly monitor bighorn sheep in and near their operations and at water sources in and adjacent to their operations. CDFW and USFS shall provide assistance in developing the training program, as needed. In addition, if directed by the CDFW or Forest Service biologist, Omya shall install remote cameras stationed at water sources to record data. The CDFW and Forest Service shall provide guidance on proper camera location and maintenance. Omya shall be responsible for maintaining the remote cameras in proper working condition, and recorded data shall be placed in a database developed by CDFW. Compliance with the bighorn sheep monitoring requirements and related employee observations/training shall be demonstrated and verified through County, Forest Service, and/or CDFW inspections. In addition, documentation demonstrating compliance with the identified bighorn sheep training/monitoring program requirements shall be maintained onsite and provided to the Forest Service, County, CDFW, and USFWS upon request. |
| Mitigation Measure BIO-21: Bighorn Sheep Employee Awareness Training:  
Omya will consult with the CDFW to incorporate bighorn sheep education and awareness into their training for employees and contractors. Training will include how to minimize impacts to bighorn sheep and include guidelines for driving, operation of heavy equipment, general quarry operation, and blasting in bighorn sheep habitat. (SBNF Biological Report PDF BHS-6) | BIO-19:  
A Final North Slope Bighorn Sheep Conservation Strategy has been prepared with the Forest Service, USFWS, and CDFW. Upon approval of the Plan of Operations and the |
Reclamation Plan by the County and the Forest Service, Omya will participate in the implementation of the strategy by contributing to specified survey and monitoring efforts, and by following applicable operational guidelines.

The North Slope Bighorn Sheep Conservation Strategy will be updated as new data and scientific understanding of the target species become available. It will include potential methods and procedures to help support the long-term management goals of maintaining a sustainable population of bighorn sheep on the North Slope.

Compliance with the North Slope Bighorn Sheep Conservation Strategy will be demonstrated and verified through County, Forest Service, and/or CDFW inspections.

In addition, documentation demonstrating compliance with the identified North Slope Bighorn Sheep Conservation Strategy requirements will be maintained onsite and provided to the Forest Service, CDFW, and County upon request.

**BIO-20:**
Within one year after approval, Omya shall begin contributing to a non-wasting endowment, designated as the North Slope Bighorn Sheep Conservation Fund (Fund). The amount of Omya’s contributions shall be determined by CDFW in coordination with the Forest Service and Omya. The Fund shall be administered by the National Fish and Wildlife Foundation as a sub-account of the CDFW Wildlife Master Mitigation Account. This sub-account shall be managed as a long term endowment dedicated to activities that aid in conservation and monitoring of bighorn sheep both within the Cushenbury herd and on proximate habitats, occupied or unoccupied, including the Bighorn Mountains and San Gorgonio Wilderness where immigration and emigration may connect groups into a functional metapopulation.
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</table>
| Mountain Lion (Felis concolor californica) | Mitigation Measure BIO-1 | Compliance with the requirements of the North Slope Bighorn Sheep Conservation Fund will be demonstrated and verified through County, Forest Service, and/or CDFW inspections.  
In addition, documentation demonstrating compliance with the identified North Slope Bighorn Sheep Conservation Fund requirements will be maintained onsite and provided to the Forest Service, CDFW, and County upon request. | See Above |

**BIO-21:** Per Project Design Feature GEN-2, Omya shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings) and applicable contractors. The program shall also incorporate bighorn sheep education, include how to minimize impacts to bighorn sheep and include guidelines for driving, operation of heavy equipment, general quarry operation, and blasting in bighorn sheep habitat. CDFW and USFS shall provide assistance in developing the training program, as needed.

In addition, documentation demonstrating compliance with the identified bighorn sheep education and awareness requirements shall be maintained onsite and provided to the Forest Service, County, CDFW, and USFWS upon request.

<p>| | See Above | See Above |</p>
<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Mitigation Measures</th>
<th>Compliance/Monitoring Procedure</th>
<th>Responsible Department</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact BIO-2:</strong> Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
<td>Mitigation Measure BIO-22: Jurisdictional Water and Agency Consultation: Prior to activities that could impact Waters of the United States or the State as identified in the Project JD, the ACOE, RWQCB-Lahontan Region and CDFW shall be consulted for concurrence with the findings of the JD and to determine if regulatory permits or approvals (i.e.: Streambed Alteration Agreement, coverage under the National Permit, Waste Discharge Request/Section 401) would be required and if considered necessary, the appropriate permits and/or approvals shall be obtained.</td>
<td>BIO-22: Prior to activities that could impact Waters of the United States or the State as identified in the Jurisdictional Delineation (JD) prepared by Tetra Tech in November 2013, Omya shall consult with the U.S. Army Corps of Engineers (ACOE), the Regional Water Quality Control Board, Lahontan Region (RWQCB-Lahontan Region), and the California Department of Fish and Wildlife (CDFW) to determine if regulatory permits or approvals are required. As shown in Figure 3.4-3 in the Draft EIR/EIS, there are four (4) potential drainage areas delineated within the Project Area. Work shall not commence in these areas until the appropriate agencies have provided concurrence with the findings of the JD and the appropriate permits and/or approvals have been obtained. Reports of potential impacts to jurisdictional waters and related permits/approvals shall be part of the annual monitoring report prepared and submitted to the Forest Service, County, and/or California Department of Conservation. In addition, documentation demonstrating compliance with the identified jurisdictional waters requirements shall be maintained onsite and provided to the Forest Service, CDFW, and County upon request.</td>
<td>U.S. Army Corps of Engineers Regional Water Quality Control Board, Lahontan Region California Department of Fish and Wildlife San Bernardino County, Land Use Servicers Department, Planning Division U.S. Department of Agriculture, Forest Service, San Bernardino National Forest United States Fish and Wildlife Service</td>
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<td>Other Sensitive Natural Communities</td>
<td>Mitigation Measure BIO-1</td>
<td>See Above</td>
<td>See Above</td>
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<td>Impact BIO-6: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?</td>
<td>Carbonate Habitat Management Strategy: Mitigation Measures BIO-1, PLANT-1 and PLANT-2, CARB-1 and CARB-2</td>
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<td>Raptor Conservation Strategy: Mitigation Measures BIO-6 through BIO-10</td>
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<td>North Slope Bighorn Sheep Conservation Strategy: Mitigation Measures BIO-6, BIO-16 through BIO-20</td>
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**CARBONATE HABITAT MANAGEMENT STRATEGY**

**BIO-1:**
See Above

**PLANT-1:**
Per Project Design Feature PLANT-1, Omya shall provide for the collection of seed and other propagules as needed in support of the revegetation plan presented in the Plan of Operations and the Reclamation Plan. Omya shall collect propagules within the Project Area to the maximum extent possible. Omya shall implemented the revegetation plan requirements, including seed and other propagule collection, in coordination with the Forest Service.

Compliance with PLANT-1 shall be demonstrated and verified through annual County mine inspections.

In addition, documentation demonstrating compliance with the identified PLANT-1 requirements will be maintained onsite and provided to the Forest Service and County upon request.

**PLANT-2:**
Per Project Design Feature PLANT-2, in coordination with the Forest Service, Omya shall provide for salvage of rare native plants within the Project Area to be propagated and/or transplanted to protected habitat reserve areas at the discretion of the Forest Service.

Compliance with PLANT-2 shall be demonstrated and verified through County and/or Forest Service inspections.

In addition, documentation demonstrating compliance with the identified PLANT-2 requirements will be maintained onsite and provided to the Forest Service and County upon request.

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**U.S. Army Corps of Engineers**
Regional Water Quality Control Board, Lahontan Region

**California Department of Fish and Wildlife**
San Bernardino County, Land Use Servicers Department, Planning Division

**U.S. Department of Agriculture, Forest Service, San Bernardino National Forest**

**United States Fish and Wildlife Service**
CARB-1:  
Per Project Design Feature CARB-1, as specified under the Carbonate Habitat Management Strategy (CHMS), and within the Project Area, Omya or the Forest Service shall at their discretion salvage carbonate endemic plant species (whole plants, cuttings, or seed), and propagules of associated species, to aid in carbonate habitat revegetation efforts on or off-site.

Compliance with CARB-1 shall be demonstrated and verified through County and/or Forest Service inspections.

In addition, documentation demonstrating compliance with the identified CARB-1 requirements will be maintained onsite and provided to the Forest Service and County upon request.

CARB-2:  
Per Project Design Feature CARB-2, for threatened and/or endangered plants, Omya shall, upon withdrawal, quit-claim specified unpatented mining claims held within San Bernardino National Forest, and convey specified patented lands, which have been verified by the Forest Service to contain occupied endangered species habitat as mitigation for impacts of the expansion on Cushenbury oxytheca (*Acanthoscyphus parishii var. goodmaniana*) pursuant to the CHMS.

Compliance with CARB-1 shall be demonstrated and verified through County and/or Forest Service inspections.

In addition, documentation demonstrating compliance with the identified CARB-1 requirements will be maintained onsite and provided to the Forest Service and County upon request.
### Environmental Impact

<table>
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<tr>
<th>Mitigation Measures</th>
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<tr>
<td>RAPTOR CONSERVATION STRATEGY</td>
<td>BIO-6 through BIO-10: See Above</td>
</tr>
<tr>
<td>NORTH SLOPE BIGHORN SHEEP CONSERVATION STRATEGY</td>
<td>BIO-6, BIO-16 through BIO-20: See Above</td>
</tr>
</tbody>
</table>

### GEOLOGY AND SOILS

**Impact GS-1:** Would the Project expose people or structures to potential substantial adverse effects, involving the risk of loss, injury, or death involving (CEQA Guidelines Threshold Criteria (a)):
- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map issued by the State Geologist for the area or based on other substantial evidence of known fault;
- Strong seismic ground shaking;
- Seismic-related ground failure, including liquefaction; or landslides.

**Mitigation Measure GS-1:** Inspect slope conditions after seismic events and remove precarious rocks from slopes:
This mitigation measure requires that slope conditions in the Project Area be inspected after a seismic event exceeding 5.5 magnitude on the Richter Scale originating from an epicenter located within 100 miles of the Project Area. Quarry operations will be halted until a qualified geotechnical engineer is retained to inspect slope conditions for potential loose blocks or other unsafe or unstable conditions. Any required slope stabilization measures must lead to achievement of a minimum factor of safety of 1.5 before quarry operations continue.

Under this mitigation measure, the Project Area also must be inspected for precarious rocks. Natural weathering processes would result in accumulation of talus on excavated benches. The talus can be left on the slopes to facilitate revegetation and to give reclaimed slopes a relatively natural appearance. It is anticipated that any boulders resulting from weathering processes would be angular and would therefore be less likely to roll downhill. Any large unstable rounded boulders on slopes steeper than 2:1 must be removed or stabilized where accessible. Areas below loose rocks must be restricted from entry and identified with proper signage.

**GS-1:** In the event a magnitude 5.5 seismic event occurs within 100 miles of the Project Area, quarry operations shall cease until a qualified geotechnical engineer can inspect affected slope conditions for potential loose blocks, precarious rocks, or other unsafe or unstable conditions. If required, slope stabilization measures shall achieve of a minimum factor of safety of 1.5 before quarry operations continue. Additionally, any large unstable rounded boulders observed by the qualified geotechnical engineer on slopes steeper than 2:1 shall be removed or stabilized where accessible. Areas below loose rocks shall be restricted from entry and identified with proper signage. Safe slope conditions following a seismic event shall be verified by the qualified geotechnical engineer before quarry operations continue.

Reports of seismic events and subsequent geotechnical evaluations shall be part of the annual monitoring report prepared and submitted to the Forest Service, County, and/or California Department of Conservation. In addition, documentation demonstrating compliance with the identified seismic slope stability requirements shall be maintained onsite and provided to the Forest Service and County upon request.

- U.S. Army Corps of Engineers
- Regional Water Quality Control Board, Lahontan Region
- California Department of Fish and Wildlife
- San Bernardino County, Land Use Servicers Department, Planning Division
- U.S. Department of Agriculture, Forest Service, San Bernardino National Forest
- United States Fish and Wildlife Service
5.0 REPORT PREPARERS

This Final EIR/EIS was prepared by an interdisciplinary team of specialists from the United States Forest Service, San Bernardino County, as well as many other agencies/organizations. Table 5-1 shows the list of preparers and individuals involved in the preparation of this Final EIS/EIR.

5.1 Distribution of the Final EIR/EIS

The following is a list of recipients of the Final EIS/EIR in alphabetical order sorted by category. In addition, all individuals and organizations that were notified are listed in Appendix B.

FEDERAL AGENCIES

U.S. Forest Service
  • Forest Supervisor’s Office, San Bernardino
  • San Bernardino National Forest – Mountaintop District

U.S. Fish & Wildlife Service
  • Carlsbad, CA Field Office
  • Palm Springs, CA Office
  • Region 8 – Pacific Southwest Office

U.S. Bureau of Land Management
  • California Desert District Office
  • Barstow, CA Field Office

U.S. Environmental Protection Agency
  • Region 9 – Environmental Review Office
  • Region 9 – Communities and Ecosystems Division

U.S. Army Corps of Engineers – Regulatory Branch

USDA Natural Resources Conservation District
Table 5-1  List of Preparers and Individuals Involved in the Preparation of this Final EIS/EIR.

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<thead>
<tr>
<th>Name</th>
<th>Final EIR/EIS Responsibilities</th>
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<tbody>
<tr>
<td><strong>United States Forest Service (USFS)</strong></td>
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</tr>
<tr>
<td>Scott Eliason</td>
<td>Environmental Coordinator District Botanist</td>
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<tr>
<td>Robin Eliason</td>
<td>District Wildlife Botanist</td>
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<tr>
<td>Scott Tangenberge</td>
<td>District Ranger</td>
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<tr>
<td>Greg Visconti</td>
<td>Locatable Minerals Geologist</td>
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<tr>
<td>Michelle Bearmar</td>
<td>Geotechnical Engineer</td>
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<tr>
<td>Bill Sapp</td>
<td>Archeologist</td>
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<tr>
<td>Rich Teixeira</td>
<td>Lead Minerals Examiner</td>
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<tr>
<td>Robert Taylor</td>
<td>Hydrologist</td>
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<tr>
<td>Anita Bueno</td>
<td>Landscape Architect</td>
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<tr>
<td>Mary Najera</td>
<td>Resource Officer</td>
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<tr>
<td>Michael Hunerlach</td>
<td>Minerals Geologist</td>
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<td><strong>County of San Bernardino</strong></td>
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<tr>
<td>Terri Rahhal</td>
<td>San Bernardino County Planning Manager</td>
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<tr>
<td>Reuben Arceo</td>
<td>San Bernardino County Contract Planner</td>
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<tr>
<td><strong>Omya, Inc.</strong></td>
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<tr>
<td>Craig Maetzold</td>
<td>Environmental Affairs Manager</td>
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<tr>
<td>James Rogers</td>
<td>Geologist</td>
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<tr>
<td><strong>Jeffer Mangels, Butler &amp; Michell (JMBM)</strong></td>
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<tr>
<td>Kerry Shapiro</td>
<td>Legal Counsel – Omya</td>
</tr>
<tr>
<td><strong>Lilburn Corporation</strong></td>
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</tr>
<tr>
<td>Marty Derus</td>
<td>Consultant - Omya</td>
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<tr>
<td>Troy Goodwall</td>
<td>Consultant - Omya</td>
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<td><strong>Sespe Consulting, Inc.</strong></td>
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<tr>
<td>John Hecht</td>
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<tr>
<td>Maya Rohr</td>
<td>Project Manager III</td>
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<tr>
<td>Scott Cohen</td>
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<tr>
<td>Graham Stephens</td>
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<tr>
<td>Ian Hutchison</td>
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<tr>
<td>John Bennett</td>
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<tr>
<td><strong>Glenn Lukos Associates, Inc.</strong></td>
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<tr>
<td>Jason Fitzgibbon</td>
<td>Biologist</td>
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<tr>
<td>Thienan Ly Pfeiffer</td>
<td>Regulatory Specialist</td>
</tr>
<tr>
<td>Dave Moskovitz</td>
<td>Senior Biologist</td>
</tr>
</tbody>
</table>
STATE AGENCIES

CA Department of Fish & Game

CA Department of Conservation
  • Department of Mine Reclamation
  • State Mining & Geology Board

CA Department of Parks & Recreation – State Historic Preservation Office

CA Department of Transportation

California Environmental Protection Agency – State Water Resources Control Board

California State Parks

California Natural Resources Agency

CA Department of Forestry & Fire Protection
  • State Board of Forestry & Fire Protection
  • CAL FIRE

State Clearinghouse

Native American Heritage Commission

Governor’s Office of Planning and Research

CA Department of Transportation – Regional Planning Office

CA Regional Water Quality Control Board
  • Colorado River Regional Office
  • Lohanttan Regional Office
LOCAL AGENCIES

County of San Bernardino

- Architecture & Engineering Department
- County Geologist
- Building & Safety Department
- Department of Public Works
  - Transportation
  - Flood Control
  - Environmental & Construction
- Land Development Division
- Biological Resources
- Earth Sciences
- Architecture Information Center
- Solid Waste Management Division
- Local Enforcement Agency
- Sheriff’s Department
- Regional Parks Department
- Real Estate Services Department
- Local Agency Formation Commission (LAFCO)
- Department of Airports
- Agricultural Commissioner’s Office
- Special Districts Department
- Planning Commission
- Fire Department
- Public Health Department
- Board of Supervisors

San Bernardino Associated Governments

San Bernardino Valley Water Conservation District

South Coast Air Quality Management District

Mojave Desert Air Quality Management District

Mojave Water Agency

Mojave Desert Natural Resource Conservation District

Bear Valley Chamber of Commerce
Big Bear Lake Fire Protection District

Big Bear Valley Fire Safe Council

Big Bear City Community Services District

Big Bear Area Regional Wastewater Agency (BBARWA)

Big Bear Municipal Water District

City of Victorville

City of Bear Lake

City of Hesperia - Hesperia Chamber of Commerce

Town of Apple Valley - Community Development Department

Los Angeles Metropolitan Water District

Inland Empire Resource Conservation District

Lucerne Valley Municipal Advisory Council

Lucerne Valley Chamber of Commerce

Lucerne Valley Economic Development Association
ORGANIZATIONS

Sierra Club
  • Desert Committee
  • San Gorgonio Chapter
  • Mountains Group
  • Big Bear Group

National Parks Conservation Association

National Wildlife Federation

Pacific Crest Trail Association

San Bernardino National Forest Association

San Bernardino Valley Audubon Society

Audubon Society

Big Bear Lake Resort Association

Big Bear Mountain Resorts

Society for the Conservation of Bighorn Sheep

Bighorn Institute

Desert Tortoise Council

Desert Survivors

The Wilderness Society

The Wildlands Conservancy

California Native Plant Society

California Off-Road Vehicle Association

Californians for Alternative to Toxics
Center for Biological Diversity

Spirit of the Sage Council

Friends of the Desert Mountains

Friends of the Mountain, Inc.

Friends of Fawnskin

Endangered Habitats League

Tri-County Conservation League

Planning & Conservation League
### 6.0 ACRONYMS FOR DRAFT AND FINAL EIR/EIS

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7.0 REFERENCES FOR DRAFT AND FINAL EIR/EIS


Western Regional Climate Center. (1960 - 2013). Big Bear Lake, CA - Monthly Climate Summary. (wrcc@dri.edu, Ed.) Retrieved June 25, 2013, from Western Regional Climate Center: http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca0741
Appendix A: List of Individual Commenters (1,155 emails)

"everyactioncustom.com" / Center for Biological Diversity (CBD)
<table>
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<tr>
<th>Comment No.</th>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
<th>City</th>
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<tbody>
<tr>
<td>1</td>
<td>Abigail</td>
<td>Martinez</td>
<td><a href="mailto:martinez_ab107@yahoo.com">martinez_ab107@yahoo.com</a></td>
<td>Riverside</td>
<td>CA</td>
<td>92501</td>
<td>8/24/2018</td>
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<tr>
<td>2</td>
<td>Abigale</td>
<td>Wool</td>
<td><a href="mailto:abbewool@charter.net">abbewool@charter.net</a></td>
<td>Long Beach</td>
<td>CA</td>
<td>90805</td>
<td>8/24/2018</td>
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<tr>
<td>3</td>
<td>Abra</td>
<td>Rider</td>
<td><a href="mailto:abra@abraider.com">abra@abraider.com</a></td>
<td>Vista</td>
<td>CA</td>
<td>92085</td>
<td>8/24/2018</td>
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<tr>
<td>4</td>
<td>Adrian</td>
<td>Vandervalk</td>
<td><a href="mailto:avandervalk@socal.rr.com">avandervalk@socal.rr.com</a></td>
<td>Northridge</td>
<td>CA</td>
<td>91352</td>
<td>8/24/2018</td>
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<td>5</td>
<td>Alan</td>
<td>McNeeney</td>
<td><a href="mailto:aem@avantecusa.com">aem@avantecusa.com</a></td>
<td>Orange</td>
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<td>6</td>
<td>Albert</td>
<td>Eurs</td>
<td><a href="mailto:areurs@twc.com">areurs@twc.com</a></td>
<td>Cypress</td>
<td>CA</td>
<td>90630</td>
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<td>7</td>
<td>Alexandra</td>
<td>Denton</td>
<td><a href="mailto:sandraeauagusta@gmail.com">sandraeauagusta@gmail.com</a></td>
<td>Los Angeles</td>
<td>CA</td>
<td>90042</td>
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<td>Simmons</td>
<td><a href="mailto:simmonsalim@gmail.com">simmonsalim@gmail.com</a></td>
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<td>93444</td>
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<td>Alexa</td>
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<td><a href="mailto:leoz360@yahoo.com">leoz360@yahoo.com</a></td>
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<td>CA</td>
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FROM: Center for Biological Diversity Supporters
RE: Omya Mine Expansion
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Beatrix
Beatriz
Ben
Bernadette
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Bethany
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Beverly
Bill
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Billy
Biz
Blair
Bob
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Bobbie
Bonnie
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Bonnie Lynn
Brandon
Brenda
Bret
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Brianna
Brigid
Brigitte
Britton
Brooke
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Bruce
Bruce
Bryant
Bubba
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Camilla
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Camilo
Carey
Carin
Carina
Carl
Carlos
Carlos
Carlos

Last Name
Greenwood
Haire
Whyman
Becker
Lyon
Graham
Dincau
Lieberson
Lowden
Tomlinson
Tacker
Boros
Baker
Barrera
Kochuba
Schramm
Pallanes
Barnes
Van Gyen
Ordona
Merrill
Firmage
Winholtz
Hamm
Edwards
Arevalo
Voelkelt
Greene
Laestadius
Evans
Steele
McGowan
Miller
Leppo
Cunningham
Flowers
W
Faith‐Smith
Burke
MacKinnon
David
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Baker
Williams
Gottejman
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Gingras
Miller
Lahiere
Borden
Murphy
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Donaldson
Carlisle
Shaffer
Vincent
Raymond
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Khalsa
Leonard
Leslie
B
Golden
Estes
Becket
Toruno
Tri
Brennan
Pinotti
Seibert
Arnold
Townsend
Cabezud

Email Comments Received
TOTAL: 1,155 comments

everyactioncustom.com
Center for Biological Diversity (CBD)

Email
barbaragreenwood14@yahoo.com
rbhairebear@charter.net
b.whyman@yahoo.com
duckie3x@aol.com
barbelyon@gmail.com
barbistan@gmail.com
barbaradincau@me.com
Balieb@cox.net
barbaral57@hotmail.com
henryvtom@yahoo.com
moosemama@yahoo.com
boros1@mac.com
barbarelli1@cox.net
Barrera0270@gmail.com
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bschramm@ucsd.edu
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Benhbarnes@hotmail.com
bvangyen1@mac.com
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emerrill4@verizon.net
Betfirmage@gmail.com
winholtz@sbcglobal.net
bjdh1115@aol.com
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itsbrandondavid@gmail.com
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carinnicolemua@gmail.com
youlovecarina@gmail.com
carloncam@gmail.com
carlos.arnold39@gmail.com
fvlosman@yahoo.com
cabezud2001@yayoo.com

2 of 16

City

State

Zip

Walnut Creek
Mira Loma
Ventura
Babylon
Goleta
San Diego
Ventura
San Diego
Cypress
Seattle
Camarillo
Santa Barbara
Chula Vista
Long Beach
Costa Mesa
San Diego
Santa Ana
Desert Hot Springs
North Hollywood
El Centro
Newbury Park
Long Beach
Morro Bay
Hesperia
La Jolla
Westminster
Upland
Oceano
San Diego
Pasadena
San Diego

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San Diego
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Santa Barbara
New York
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Santa Maria
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<td>Dr</td>
<td>Desantis</td>
<td><a href="mailto:ultraphonique@yahoo.com">ultraphonique@yahoo.com</a></td>
<td>Los Angeles</td>
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<td><a href="mailto:earthanctionnetwork@earthlink.net">earthanctionnetwork@earthlink.net</a></td>
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<td><a href="mailto:elisekott@gmail.com">elisekott@gmail.com</a></td>
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<td><a href="mailto:go00474@gmail.com">go00474@gmail.com</a></td>
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<td><a href="mailto:winamariae@o.com">winamariae@o.com</a></td>
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<td><a href="mailto:grstewart@cpp.edu">grstewart@cpp.edu</a></td>
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<td><a href="mailto:gus@mindig1.com">gus@mindig1.com</a></td>
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<td>Gwen</td>
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<td>Heidi</td>
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<td><a href="mailto:heidilynn@nether.com">heidilynn@nether.com</a></td>
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<td>Helen</td>
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<td><a href="mailto:helensm@verizon.net">helensm@verizon.net</a></td>
<td>Atascadero</td>
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<td>425</td>
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<td><a href="mailto:adelofolopez13@gmail.com">adelofolopez13@gmail.com</a></td>
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<td>426</td>
<td>Isabel</td>
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<td><a href="mailto:icervera@isciie.es">icervera@isciie.es</a></td>
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<td>Ivan</td>
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<td><a href="mailto:ihw@halperin.com">ihw@halperin.com</a></td>
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<td>J</td>
<td>Phillips</td>
<td><a href="mailto:jkphillii@wisc.edu">jkphillii@wisc.edu</a></td>
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<td>Van Akin</td>
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<td>CA</td>
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TO: Supervisor Jody Noiron (Forest Service)
FROM: Center for Biological Diversity Supporters
RE: Omya Mine Expansion
Comment
No.
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First Name
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Last Name
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Pennington
Birdwhistell
Vecchi
Glaston
Cuviello
Klayman
Charbonneau
Varga
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Dutton
Satchell
Kaplan
Lucas
Warner
Teevan
Wills
McLaurin
Pasqua
OConnell
Rodrigues
Berges
Pendleton
Pradetto
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Sanchez Gil
Boone
Shulman
Black
Kaye‐Carr
Zamora
Fedele
Pratt
Frye
Burk
Pewthers
Balboa
Spiegel
Philpot
Alexandre
Fukunaga
Williams
Sweatland
Smith
Vazquez‐Souza
Molthop
Jegou
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Yamada
Snyder
Chernow
Shelton
Shannon
Ewert
DeCarlo
M.
Moffitt
Bowden
Toyohara
McChrystal
Olson
Pendroff
Bachman
Walsh
Steinberg
Frandson
Johnson
Warner
Rosvall
Van Every
Herring

Email Comments Received
TOTAL: 1,155 comments

everyactioncustom.com
Center for Biological Diversity (CBD)

Email
jmbritton@ymail.com
jojack760@gmail.com
rp92672@gmail.com
joannebirdwhistell@gmail.com
joevecchi@yahoo.com
vidiot49@yahoo.com
joe@cuviello.com
Joelk2020@gmail.com
Johncterryc@sbcglobal.net
jlvarga9@gmail.com
jlvarga9@gmail.com
jkirk@geartrains.com
John_Dutton@patagonia.com
satchelljohn29@gmail.com
drjohnsaddress@yahoo.com
johnaklucas@gmail.com
jw@sbnatives.com
jptrugger@gmail.com
cyrus12345@hotmail.com
knotundn416@gmail.com
killself5150@yahoo.com
hrisez@yahoo.com
johnnyflame55@att.net
jonb@sonance.com
jkpend@gmail.com
beachykeenrentals@gmail.com
josemikegomez@yahoo.com
joselsgil@yahoo.com
jboone@calpoly.edu
jhshulman1@cox.net
jblack@ilrc‐trico.org
care2@applexpert.com
archangel157@gmail.com
joyfedele@yahoo.com
somispratt@gmail.com
joycefkenw@outlook.com
joyceburk@earthlink.net
vjpewthers@att.net
mjb1013@verizon.net
judspiegel@roadrunner.com
jakphilpot@juno.com
Judy.Alexandre@csulb.edu
judysfinag@aol.com
twinoaks1@wildblue.net
judsweatland@gmail.com
raynjulie1048@sbcglobal.netg
jasouza9@hotmail.com
juliemolthop@gmail.com
jjegou@yahoo.fr
sunnycanuck77@gmail.com
june.yamada1@gmail.com
justinsnyder19@yahoo.com
jchernow2@yahoo.com
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kaelan@laughingsoul.net
kaiewert@gmail.com
decarloville@sbcglobal.net
kmussette@me.com
kmoff@earthlink.net
kbowden@ucsd.edu
spboersma@gmail.com
mcchrystal6.0@gmail.com
kolson@aveox.com
kare1212@aol.com
karenbachman@yahoo.com
cinerina@gmail.com
ksteinberg1@yahoo.com
karla.frandson@gmail.com
katherinejohnson1@cox.net
Pkrudester@gmail.com
krosvall@cox.net
bupkat@charter.net
kathleen.herring@icloud.com

8 of 16

City
San Diego
Carlsbad
San Clemente
La Jolla
Garden Grove
Desert Hot Springs
Solana Beach
Huntington Beach
Spring Valley
Huntington Beach
Huntington Beach
Santa Barbara
Santa Barbara
San Miguel
Wildomar
Los Osos
Goleta
Chula Vista
Indio
Paso Robles
Escondido
El Toro
Lakeside
San Clemente
Oceanside
San Marcos
Moreno Valley
Hacienda Heights
San Luis Obispo
San Diego
Carpinteria
Ventura
Rialto
Ojai
Somis
La Quinta
Redlands
Placentia
San Jacinto
Sherman Oaks
Huntington Beach
Ventura
Arroyo Grande
Caliente
San Juan Capistrano
Los Osos
San Diego
Los Angeles
Irvine
Bakersfield
Westminster
Escondido
Paso Robles
Carlsbad
Corona
Oak View
Riverside
Beverly Hills
San Diego
Escondido
La Mesa
Santa Monica
Simi Valley
Los Angeles
Newbury Park
San Diego
Newport Beach
San Diego
Santa Barbara
Ventura
Vista
Atascadero
La Quinta

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TO: Supervisor Jody Noiron (Forest Service)
FROM: Center for Biological Diversity Supporters
RE: Omya Mine Expansion

everyactioncustom.com
Center for Biological Diversity (CBD)
Email Comments Received
TOTAL: 1,155 comments

Comment No. First Name Last Name Email City State Zip Date Received
877 Penny Elia greenp1@cox.net Laguna Beach CA 92651 8/24/2018
878 Peter Cummins cummins.peter@gmail.com 0 8/25/2018
879 Peter Kuhn peterkuhn66@hotmail.com San Diego CA 92117 8/24/2018
880 Peter Bobbermen pctrfrank@msn.com Coronado CA 92118 8/24/2018
881 Peter Weiner peterprops00@gmail.com Sugarloaf CA 92386 8/25/2018
882 Philip Glaser pglaser3@cox.net Laguna Niguel CA 92677 8/24/2018
883 Phillip Cripps Pcripps@roadrunner.com Cathedral City CA 92234 8/26/2018
884 Polly Lewis polly@email.com Frazier Park CA 93225 8/24/2018
885 Peter Kuhn peterkuhnxx@gmail.com Fontana CA 92117 8/24/2018
886 Peter Bobbermen bobbo.66@hotmail.com La Jolla CA 92037 8/26/2018
887 Rachel Neeley racheldneeley@gmail.com Santa Ana CA 92705 8/25/2018
888 Rachel Miller rachelle.clara.miller@gmail.com Fullerton CA 92835 8/24/2018
889 Rachel Peterson racheldneeley@gmail.com Bakersfield CA 93313 8/26/2018
890 Rachelle Miller rachelle.clara.miller@gmail.com Costa Mesa CA 92626 8/25/2018
891 Rae Newman dancingriver@hotmail.com Los Angeles CA 92104 8/24/2018
892 Raleigh Koritz tabbykat728@q.com Minneapolis MN 55442 8/26/2018
893 Ralph Bocchetti riverglen2816@yahoo.com Fontana CA 92337 8/24/2018
894 Rand Matsumoto randmatsumoto@gmail.com Torrance CA 90502 8/24/2018
895 Randall Boltz Portofsherwood@att.net San Diego CA 92111 8/24/2018
896 Raquel Karno rckarno@icloud.com San Diego CA 92117 8/24/2018
897 Ray Sharafi raysharafi@icloud.com Ladera Ranch CA 92694 8/24/2018
898 Rayline Dean rayline@gmail.com Ridgecrest CA 93555 8/24/2018
899 Rachel Zamora zamorarachel15@yahoo.com Bakersfield CA 93313 8/26/2018
900 Rachelle Miller rachelle.clara.miller@gmail.com Fullerton CA 92835 8/24/2018
901 Rebecca Steelman artcityusa@sbcglobal.net Rialto CA 92376 8/25/2018
902 Regina Logue rehltime@yahoo.com Menifee CA 92586 8/24/2018
903 Regina Flores wilemina@hotmail.com Lake Elsinore CA 92532 8/23/2018
904 Rena Lewis rlenew7@gmail.com Ojai CA 93023 8/24/2018
905 Rena Zaman-Zade r2s9@yahoo.com Escondido CA 92375 8/24/2018
906 Renee Suarez quiet_email@hush.com Buena Park CA 90620 8/25/2018
907 Renee La Shelle naynaysay7@gmail.com Lucerne Valley CA 92356 8/25/2018
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948 Ron Frech rufrech@gmail.com Boron CA 93516 8/24/2018
949 Ron Riskin acusurferdoc@cox.net Santa Barbara CA 93103 8/24/2018
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<td><a href="mailto:coler95585@mypacks.net">coler95585@mypacks.net</a></td>
<td>Loma Linda</td>
<td>CA</td>
<td>92354</td>
<td>8/26/2018</td>
</tr>
<tr>
<td>Shirley</td>
<td>id</td>
<td><a href="mailto:sid@geekohale.com">sid@geekohale.com</a></td>
<td>San Diego</td>
<td>CA</td>
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<td>Silviana</td>
<td>Luna</td>
<td><a href="mailto:silverluna91342@yahoo.com">silverluna91342@yahoo.com</a></td>
<td>Sylmar</td>
<td>CA</td>
<td>91342</td>
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<td>Simone</td>
<td>Schad</td>
<td><a href="mailto:simone_a_s@hotmail.com">simone_a_s@hotmail.com</a></td>
<td>Encinitas</td>
<td>CA</td>
<td>92024</td>
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<td>Sofia</td>
<td>Okolowicz</td>
<td><a href="mailto:pastatlarge1@aol.com">pastatlarge1@aol.com</a></td>
<td>Temeucula</td>
<td>CA</td>
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<tr>
<td>Sophia</td>
<td>Santitboro</td>
<td><a href="mailto:sophia@santitboro.com">sophia@santitboro.com</a></td>
<td>Simi Valley</td>
<td>CA</td>
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<td>8/24/2018</td>
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<tr>
<td>Stacy</td>
<td>Herzing</td>
<td><a href="mailto:staceyherzing@yahoo.com">staceyherzing@yahoo.com</a></td>
<td>Laguna Beach</td>
<td>CA</td>
<td>92651</td>
<td>8/24/2018</td>
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<tr>
<td>Staci</td>
<td>Martin</td>
<td><a href="mailto:islanddaydream@gmail.com">islanddaydream@gmail.com</a></td>
<td>Carlsbad</td>
<td>CA</td>
<td>92009</td>
<td>8/24/2018</td>
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</tbody>
</table>
TO: Supervisor Jody Noiron (Forest Service)
FROM: Center for Biological Diversity Supporters
RE: Omya Mine Expansion
Comment
No.
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First Name
Thomas
Tim
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Timothy
Timothy
Tina
Toby Ann
Tom
Tom
Tom
Toni
Tracy
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Travis
Tricia
Trish
Tristen
Tulsi
Twyla
Veronica
Vickey
Vicki
Vicki
Victor
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Victoria Robor
Virginia
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Virginia
Vong
WG
Walter
Walter C
Wanda
Wayne
Wendy
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Wesley
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William
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Winn
Woody
Yomaira
Yuriko
Yuru
Yvonne
Z'ava

Last Name
Hernandez
Ryan
Brady
Wilson
Dressel
Hayes
Maurer
Davis
Villalobos
Mellone
Reese
Peterson
Rummel
Chester
Tiritilli
Gilbert
Shortle ‐ Turner
Benneian
Keen
McCall
Fierro
Milliken
Meyer
B.
Baker
Bingaman
Hughes
Paglia
Silver
Peyser
Shankling
Roberts
Bennett
Sharkey
Ferguson
Do
Wallin
Erhorn
Steffen
Hendrix
Kastner
Wittl
Raymond
McCarthy
alvarez
Rogneby
Fers
Engs
Hewes
Dane
Grosh
Willis
Buring
Adams
Maxwell
Jaramillo
Hazlett
Feng
Smith
Rosen

Email Comments Received
TOTAL: 1,155 comments

everyactioncustom.com
Center for Biological Diversity (CBD)

Email
GWFan2003@yahoo.com
janemarie19@gmail.com
purplehazent@mac.com
dwilson2@cox.net
tgd223@gmail.com
huixli@gmail.com
we8575tim@gmail.com
Tsdavis54@yahoo.com
tim_villalobos@yahoo.com
tinabadina9@verizon.net
Tobyareese@zoominternet.net
tompetersoncollection@hotmail.com
greenthumbsd@gmail.com
tom@tchester.org
tonimtill@gmail.com
tgilbert@californiasteel.com
tracyshortle@yahoo.com
tjbenneian@gmail.com
triciakeen@yahoo.com
mccall.trish@gmail.com
tristenmfierro@gmail.com
tulsi@inphases.com
tmmacc15@aol.com
fadavero@gmail.com
doghaven@harlannet.com
vbrehabber@gmail.com
vdh2810@gmail.com
vic_paglia@hotmail.com
vasilver@uci.edu
vpeyser@msn.com
vshankling@cox.net
vicsiris1@gmail.com
vbennett@hawaii.eduu
V.sharkey@sbcglobal.net
gingyf@gmail.com
hccvad@yahoo.com
furryboys3@roadrunner.com
waltererhorn@cox.net
wcsteffen43@yahoo.com
hiwandada@gmail.com
wkastner@sbcglobal.net
wjwittl@cox.net
hampster@vzw.blackberry.net
wmmccarthy7@gmail.com
w.alvarez@pacbell.net
wesleyrogneby@yahoo.com
wendyfears@gmail.com
engs@juno.com
mrwrh@sbcglobal.net
williamzmail@yahoo.com
groshjrw@earthlink.net
billythekid189@yahoo.com
boyblue05@gmail.com
1305wa@gmail.com
pwderman6@aol.com
bordeaux825@yahoo.com
ynmnh@hotmail.com
feng.yuru@gmail.com
leilanismith33@gmail.com
zdancer@gmail.com

16 of 16

City
Corona
Capistrano Beach
Aliso Viejo
Poway
San Diego
San Diego
Anaheim
Garden Grove
Spring Valley
San Diego
Valley City
Palo Verde
San Diego
Fallbrook
La Quinta
Rialto
Los Alamitos
Lake Elsinore
Ventura
Santa Monica
Whittier
Fallbrook
Pomona
Placerville
Harlan
Frazier Park
Huntington Beach
Newport Beach
Irvine
Newark
Aliso Viejo
Grover Beach
Honolulu
San Diego
San Diego
Garden Grove
Thousand Oaks
Spring Valley
Escondido
Morro Bay
Costa Mesa
Santa Barbara
Laguna Niguel
Santa Ana
Pico Rivera
San Luis Obispo
Irvine
Highland
Simi Valley
Rancho Cucamonga
El Centro
Garden Grove
Upland
Bellingham
Ventura
Chino
Oxnard
Santa Barbara
Upland
Indio

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Date
Received
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8/24/2018


September 6, 2018

Maya Rohr
Sespe Consulting Inc.
5920 Friars Road, Suite 103
San Diego, CA 92108

Re: Butterfield EIS/EIR Email comments

Hello Maya,

Attached for your records is the CD containing approximately 1,177 email comments concerning the EIR/EIS Butterfield Sentinel Quarry Expansion project.

Thank you.

Reuben J. Arceo

Attachment: CD
September 13, 2018

Maya Rohr
Sespe Consulting Inc.
1565 Hotel Circle, Suite, 370
San Diego, CA 92108

Re: Butterfield Sentinel Quarry Expansion Mining Project No. AP20120022

Hello Maya, attached is the CD containing the email comments I received.

Thank you.

Redben J. Arceo
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land‐use plans.

The draft documents also downplay the impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging. Mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors.

Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

. .
Oceanside, CA 92057
ZekeAA@Lycos.Com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Abigail Martinez
Riverside, CA 92501
martinez_aby107@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
abigale wool  
Long Beach, CA 90805  
abbewool@charter.net
Dear Planner Reuben Arceo,

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Sincerely,

Abra Rider
Vista, CA 92085
abra@abrarider.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Adrian Vandervalk
Northridge, CA 91325
avandervalk@socal.rr.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Akane Nishimura
Los Angeles, CA 90066
anishimu@ucla.edu
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

We must stop destroying the environment just to make profit. Surely you must also have children, grandchildren etc that would like to enjoy what is left of this beautiful country, in its natural state...not in a zoo or on an old BBC documentary!! Why are you intent in cheating them out of all the beauty that we have enjoyed? Why is our generation so selfish and greedy? I am ashamed!!

Sincerely,
Alan McNeeney
Orange, CA 92865
aem@avantecusa.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Albert Eurs
Cypress, CA 90630
areurs@twc.com
Dear Planner Reuben Arceo,

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Sincerely,
Alexandra Denton
Los Angeles, CA 90042
sandiraeaugusta@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Alexandria Simmons
Nipomo, CA 93444
simmonsalie@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Alexia Valdora
Palm Desert, CA 92255
lexz360@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Alexis Cruz
Murrieta, CA 92562
alexjcruz.r@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Alexis Grone
Oceanside, CA 92058
alexis.grone@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Alfredo A Figueroa
Blythe, CA 92225
lacunadeatzlan@aol.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

Alice Neuhauser
Manhattan Beach, CA 90266
apntrc@msn.com
Dear Planner Reuben Arceo,

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Sincerely,
Alice Savage
San Diego, CA 92128
savagealice1@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Alisa Risso
Ladera Ranch, CA 92694
Technokity1@gmail.com
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Sincerely,
Allegra Sposito
Glendale, CA 91204
Allegra.sposito@gmail.com
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Sincerely,
Allen Olson
Minneapolis, MN 55409
tctcdaboyz@gmail.com
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Sincerely,
allie palmer
San Clemente, CA 92672
allie@pjhm.com
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Sincerely,
Allison Simonis
Joshua Tree, CA 92252

simonis_a@yahoo.co.uk
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Sincerely,
Allyson Finkel
Rancho Santa Margarita, CA 92688
allyson.finkel@gmail.com
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Sincerely,
Alva Williams
Joshua Tree, CA 92252
adw1951@yahoo.com
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Sincerely,
Amanda Frost
Santa Barbara, CA 93105
acfsb@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Amanda Woods
San Diego, CA 92104
acwoods314@gmail.com
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Sincerely,
Amara Siva
San Diego, CA 92128
ac_siva@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Amber Gill
Fullerton, CA 92835
agilzooskittles@gmail.com
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Sincerely,

Amy Munnelly
Irvine, CA 92606
amunn3@gmail.com
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Sincerely,
Amy Van Schijndel
San Diego, CA 92101
amyvans222@gmail.com
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Sincerely,
Ana Rosvall
Vista, CA 92084
ana.c.rosvall@gmail.com
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Sincerely,
Anaundda Elijah
San Luis Obispo, CA 93401
satchitananda3@att.net
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Sincerely,

Andrea Lux
Fullerton, CA 92835
rubyroxu@aol.com
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Sincerely,
Andrew Abate
Ventura, CA 93001
abateand@hotmail.com
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Sincerely,
Andrew Philpot
Solvang, CA 93463
andrewphilpot@verizon.net
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Sincerely,
Andy Lupenko
Lemon Grove, CA 91945
FCCSD@SBCGLOBAL.NET
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Sincerely,

Andy Ramirez
Santa Ana, CA 92707
andyram87@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Angela Hawkins
San Diego, CA 92107
ammhawkins@gmail.com
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Sincerely,
Angela Marmorino
Los Angeles, CA 90046
angela@mrchow.com
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Sincerely,
Angie Grosland Jones
San Diego, CA 92122
angiegrosland@hotmail.com
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Angie Rivera Olmedo
Los Angeles, CA 90026
givepraiseslove213@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Animae Chi
New York, NY 10002
wolfgangbear1@gmail.com
From: perry3464@everyactioncustom.com on behalf of Anithra Perry <perry3464@everyactioncustom.com>
Sent: Friday, August 24, 2018 9:32 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

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Sincerely,
Anithra Perry
Winchester, CA 92596
perry3464@gmail.com
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Sincerely,
Ann Breuer
Centralia, IL 62801
annbreuer@yahoo.com
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Sincerely,
Ann Dorsey
Northridge, CA 91325
aedorsey@hotmail.com
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Sincerely,
Ann Gould Massoubre
Los Osos, CA 93402
bodhababe@hotmail.com
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Sincerely,
Ann Stratten
La Mesa, CA 91941
strats2@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Anna Kokotovic PhD
Goleta, CA 93117
anna48k@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Anna Lopinski
Burbank, CA 91505
anna.lopinski27@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Anna Marie Weiner
Goleta, CA 93117
weinerannamarie@gmail.com
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Sincerely,
Anna Reback
San Clemente, CA 92672
annareback@cox.net
Dear Planner Reuben Arceo,

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Sincerely,

Anne Corrigan
San Diego, CA 92104
azpuggles@cox.net
Dear Planner Reuben Arceo,

My family and I are writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Anne Harvey
San Diego, CA 92130
aharvey@ucsd.edu
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Sincerely,
Anne Kobayashi
San Diego, CA 92122
annekobayashi@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Annica Kreuter
Joshua Tree, CA 92252
annica@outlook.com
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Sincerely,
Annie P
San Diego, CA 92101
annie95@mac.com
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Sincerely,
Annie Wei
48700
travel_pet2@hotmail.com
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Sincerely,
Anniesha Daniels
Los Angeles, CA 90002
annieshafaye@gmail.com
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Sincerely,
Anthony Castiglione
Irvine, CA 92620
redhog00@gmail.com
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Sincerely,
Anthony Crain
Riverside, CA 92507
anychcrain@verizon.net
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Sincerely,
Antonia Chianis
Blue Jay, CA 92317
Tonyaandandreas@charter.net
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Sincerely,
Antonio Dettori
San Diego, CA 92117
tdettori@yahoo.com
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Sincerely,
April Gallardo
San Marcos, CA 92079
aprilarleneyahne@gmail.com
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Sincerely,
Arnold Schildhaus
Santa Barbara, CA 93110
jamaps@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

Arthur Kennedy
Goleta, CA 93117
artkennedy35@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Arthur Orr
Goleta, CA 93117
orr.arthur@gmail.com
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Sincerely,
ARTHUR SHAW
Granada Hills, CA 91344
ashaw@socal.rr.com
Dear Planner Reuben Arceo,

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Sincerely,
Ashley Chafin
Los Angeles, CA 90039
chafina@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Ashley Felix
Riverside, CA 92506
TheSoftCushionKiller@yahoo.com
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Sincerely,
Audrey Clark
Carlsbad, CA 92011
sequoiataj@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Aydee Palomino
La Quinta, CA 92253
aydeep@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
B G
Orange, CA 92869
pantheratigrisgrl@yahoo.com
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Sincerely,
B. Chan
San Diego, CA 92131
bettechan@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Bamshad Akhbari
Los Angeles, CA 90048
bamshad@bac-corp.com
Dear Planner Reuben Arceo,

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Sincerely,
Barbara Baker Baker
Chula Vista, CA 91911
barbarelli1@cox.net
Dear Planner Reuben Arceo,

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Sincerely,

Barbara Becker
Babylon, NY 11702
duckie3x@aol.com
Dear Planner Reuben Arceo,

NO MINE EXPANSION.

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Sincerely,
Barbara Boros
Santa Barbara, CA 93105
boros1@mac.com
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Sincerely,
Barbara Dincau
Ventura, CA 93003
barbaradincau@me.com
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Sincerely,

barbara Graham
San Diego, CA 92110
barbistan@gmail.com
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Sincerely,
Barbara Greenwood
Walnut Creek, CA 94596
barbaragreenwood14@yahoo.com
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Sincerely,

Barbara Haire
Mira Loma, CA 91752
rbhairebear@charter.net
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Sincerely,
Barbara Lieberson
San Diego, CA 92114
Balieb@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Barbara Lowden
Cypress, CA 90630
barbaral57@hotmail.com
Dear Planner Reuben Arceo,

I am a lifelong Californian. I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Barbara Lyon
Goleta, CA 93116
barbelyon@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Barbara Tacker
Camarillo, CA 93012
moosemama@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Barbara Tomlinson
Seattle, WA 98102
henryvtom@yahoo.com
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Sincerely,
Barbara Walker
Norman Park, GA 31771
angelwalker2299@cox.net
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Sincerely,
Barbara Whyman
Ventura, CA 93001
b.whyman@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Baron Barrera
Long Beach, CA 90804
barrera0270@gmail.com
From: penguinmvp71@everyactioncustom.com on behalf of Barry Kochuba <penguinmvp71@everyactioncustom.com>  
Sent: Saturday, August 25, 2018 12:13 PM  
To: Arceo, Reuben  
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Barry Kochuba  
Costa Mesa, CA 92626  
penguinmvp71@gmail.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Beatrix Schramm
San Diego, CA 92109
bschramm@ucsd.edu
Dear Planner Reuben Arceo,

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Sincerely,
Beatriz Pallanes
Santa Ana, CA 92704
ez2beawith@yahoo.com
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Sincerely,
Ben Barnes
Desert Hot Springs, CA 92240
Benhbarnes@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Bernadette Van Gyen
North Hollywood, CA 91601
bvangyen1@mac.com
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Sincerely,
Bernardo Ordona
El Centro, CA 92243
brordon@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Beth Merrill
Newbury Park, CA 91320
emerrill4@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Bethany Firmage
Long Beach, CA 90814
Betfirmage@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Betty Arevalo
Westminster, CA 92683
ladieinpink3@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Betty Edwards
La Jolla, CA 92037
bedwards1@san.rr.com
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Sincerely,

Betty Hamm
Hesperia, CA 92345
bjdh1115@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Betty Winholtz
Morro Bay, CA 93442
winholtz@sbcglobal.net
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Sincerely,
Beverly Voelkelt
Upland, CA 91786
beverlybernice@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Bill Evans
Pasadena, CA 91104
bill82019@aol.com
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Sincerely,

Bill Greene
Oceano, CA 93445
ferdy01@aol.com
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Sincerely,
Bill Laestadius
San Diego, CA 92109
wrl007@hotmail.com
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Sincerely,
Billy Steele
San Diego, CA 92117
bsteele22@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Biz McGowan
00000
e.mcgowan49@btinternet.com
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Sincerely,
Blair Miller
San Diego, CA 92127
bmiller1701@gmail.com
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Sincerely,
Bob Cunningham
Santa Barbara, CA 93101
Bc@arcadiastudio.com
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Sincerely,
Bob Leppo
Pismo Beach, CA 93449
bob_leppo@yahoo.com
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Sincerely,
Bobbie Flowers
New York, NY 10011
bobbie_flowers@hotmail.com
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Sincerely,
Bonnie Burke
San Diego, CA 92160
b_margay@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Bonnie Faith-Smith
Cambridge, MA 02139
whiteowl1@comcast.net
Dear Planner Reuben Arceo,

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Sincerely,
Bonnie Lynn MacKinnon
Georgetown, TX 78626
bmackinnonwitherspoon@yahoo.com
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Sincerely,
Bonnie W
Temecula, CA 92591
sagegrammy@gmail.com
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Sincerely,
Brandon David
Duarte, CA 91010
itsbrandondavid@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Brenda Heming
Tehachapi, CA 93561
brendaheming2@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Bret Baker
San Diego, CA 92115
onebret1@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Bri Williams
Julian, CA 92036
brigida.williams@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Brian Gingras
Braintree, MA 02184
briangin54@beld.net
Dear Planner Reuben Arceo,

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Sincerely,
Brian Gottejman
Los Alamitos, CA 90720
blgottejman@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Brian Kirk
Orange, CA 92866
rbkirkabc@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Brian Lahiere
Santa Monica, CA 90403
brian@lahiere.com
Dear Planner Reuben Arceo,

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Sincerely,
Brian Miller
Palmdale, CA 93550
bmnl@yahoo.com
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Sincerely,
Brianna Borden
Placentia, CA 92870
briborden@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Brigid Murphy
Chino, CA 91710
bamvetm@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

Brigitte James
Upland, CA 91784
bgjames1222@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Britton Donaldson
San Diego, CA 92103
brittondonaldson@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Brooke Carlisle
Dana Point, CA 92629
Brookecarlisle@gmail.com
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Sincerely,
Brooke Shaffer
Hesperia, CA 92345
brookejim.bs@gmail.com
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Sincerely,
Bruce Raymond
Oceanside, CA 92054
bruceray49@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Bruce Vincent
Ojai, CA 93023
backwoodsbruce1@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Bryant Baker
Goleta, CA 93117
bryant@lpfw.org
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Sincerely,
Bubba Khalsa
Del Mar, CA 92014
dshannahoffkhalsa@ucsd.edu
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Sincerely,
C B
Fountain Valley, CA 92708
orthochi@yahoo.com
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Sincerely,
c leonard
San Bernardino, CA 92404
cleonard1075@yahoo.com
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Sincerely,
C Leslie
Seal Beach, CA 90740
carmnsuzy2@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,

C. Golden
Woody, CA 93287
cgold666@hotmail.com
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Sincerely,
Camilla Becket
Ojai, CA 93023
camilla@becketfilms.com
Dear Planner Reuben Arceo,

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Sincerely,
Camilla Estes
Menifee, CA 92584
camillarestes@gmail.com
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Sincerely,
Camilo Toruno
Altadena, CA 91001
camilotoruno@gmail.com
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Sincerely,

Carey Tri
Chatsworth, CA 91311
cjztryingagn@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Carin Brennan
Thousand Oaks, CA 91360
carinnicolemua@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Carina Pinotti
North Hills, CA 91343
youlovecarina@gmail.com
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Sincerely,
Carl Seibert
Costa Mesa, CA 92626
carloncam@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Carlos Arnold
Santa Maria, CA 93455
carlos.arnold39@gmail.com
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Sincerely,
Carlos Cabezud
San Ysidro, CA 92143
cabezud2001@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Carlos Townsend
Fountain Valley, CA 92708
fvlosman@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Carmen Marti
Huntington Beach, CA 92647
carmenmarti35@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Carol Boyd
Escondido, CA 92027
cjboyd59@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Carol Dewell
San Diego, CA 92117
cidewell@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Carol Evers
San Diego, CA 92104
059carol60@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Carol Holland
Costa Mesa, CA 92627
cholland4646@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Carol McDonald-Gibson
San Diego, CA 92116
cmcdgibson@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Carol Wiley
Victorville, CA 92394
desertlily1@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Carole Johnson
Apple Valley, CA 92307
cdoodie60@aol.com
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Sincerely,
Carolyn Barkow
San Diego, CA 92119
itzmeee@cox.net
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Sincerely,
Carolyn Dennison
Garden Grove, CA 92840
carolyndennison@hotmail.com
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Sincerely,
Carolyn Dickson
Rancho Cucamonga, CA 91730
ctboor909@charter.net
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Sincerely,
Carolyn Rohrer
Carlsbad, CA 92011
laceyjocey@outlook.com
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Sincerely,
Caryl Pearson
San Luis Obispo, CA 93406
wolfcoyotedeerelk@yahoo.com
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Sincerely,
Casey Dake
Thousand Oaks, CA 91362
dukeofunk@verizon.net
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Sincerely,
Cassandra Williams
Brawley, CA 92227
coolcassygurl@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Cassidy Kelly
Irvine, CA 92606
cassidywashere@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Catherine Bruington
Riverside, CA 92507
cathy.bruington@ucr.edu
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Sincerely,

Catherine Kimbrough
Mission Viejo, CA 92692

greeniecat@cox.net
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Sincerely,
Catherine Wood
San Diego, CA 92154
cathy@daneweb.com
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Sincerely,
Cathi Sasser
Yorba Linda, CA 92887
cis insure@aol.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Cathy Hale
San Diego, CA 92101
chale@sdtg.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cathy Neal
Rancho Cucamonga, CA 91730
rccatsinneed@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Celeste Anacker
Santa Barbara, CA 93105
celesteanacker@gmail.com
Dear Planner Reuben Arceo,

Please deny the proposed Omya mine expansion, on the north slope of the San Bernardino Mountains, and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

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Sincerely,
Celia Kutcher
Capistrano Beach, CA 92624
celia552@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Celia Thilgen
Foothill Ranch, CA 92610
celiathilgen@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Chad Alvarez
West Palm Beach, FL 33406
lovesbob@hotmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Charles Tribbey
San Luis Obispo, CA 93405
cltquest@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Charlotte Masarik
Laguna Beach, CA 92651
charlottemasarik@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Charlotte Matthews
Murrieta, CA 92563
quiltercam@gmail.com
From: Cherylberry@everyactioncustom.com on behalf of Cheryl Berry
Sent: Friday, August 24, 2018 1:05 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cheryl Berry
Irvine, CA 92604
Cherylberry@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cheryl Delvecchio
Paso Robles, CA 93446
ccdelvecchio@sbcglobal.net
Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cheryl Lewis
San Luis Obispo, CA 93401
Cmlnp50@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cheryl Michalak
Escondido, CA 92026
cherim2@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cheryl Zanini
Highland, CA 92346
czanini@firstam.com
**Graham Stephens**

**From:** flikasailor@everyactioncustom.com on behalf of Chris Bouckaert  
<flikasailor@everyactioncustom.com>  
**Sent:** Saturday, August 25, 2018 1:16 PM  
**To:** Arceo, Reuben  
**Subject:** No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Chris Bouckaert  
Thousand Oaks, CA 91360  
flikasailor@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Chris Cano
Oxnard, CA 93036
crittersays@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Chris Seaton
Santa Barbara, CA 93101
seatopwr@verizon.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Chris Wick
Oceanside, CA 92057
cwick@palomar.edu
Dear Planner Reuben Arceo,

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Sincerely,
Chrissie Rappolt
Lodi, NY 14860
CRappolt@yandex.com
Dear Planner Reuben Arceo,

I am writing to you as a southern California resident who enjoys the San Bernardino forest. I urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to me drawing board!

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

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Sincerely,

Christian Edwards
Lake Forest, CA 92630
cpedwards11@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
christiane schneebeli
Albany, NY 12241
c_schneebeli@bluewin.ch
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Christina Durbin
Chula Vista, CA 91911
christinadurbin@sandiego.edu
Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Christina Singleton
Pacific Palisades, CA 90272
cindyyungyao@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Christina Torres
Moreno Valley, CA 92555
cmt.teck@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Christina Whittemore
Santa Maria, CA 93455
chevygirluvsrnh@gmail.com
Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Christine Hein
Huntington Beach, CA 92648
catsrgods@twc.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Christine Johnson
Indio, CA 92201
manycavies@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Christine Ney
Anaheim, CA 92807
cmney@att.net
Dear Planner Reuben Arceo,

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Sincerely,
Christine Sepulveda
Anaheim, CA 92802
simianchrissy@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Christopher Jones
Running Springs, CA 92382
chrisjones728@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Chuck Catero
Corona, CA 92881
Ccatero33@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Chuck Karp
Palm Desert, CA 92261
chaskarp@earthlink.net
Dear Planner Reuben Arceo,

I have led my classes into the San Bernardino Mts. for many years and cannot understand why you are considering OK-ing a plan that would destroy more of these unique mountains. The plants that grow on these rare soils are adapted to these soils only and are unique to these mountains and you are considering allowing a plans that will selectively destroy their only habitat. Why wasn't this addressed in the E.I.S?

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Chuck Leavell
Anaheim, CA 92806
clevel0@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Chuck Rocco
Simi Valley, CA 93065
crocco1250@aol.com
Dear Planner Reuben Arceo,

As a high school biology teacher, living in San Bernardino County, I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cindy Segal
Upland, CA 91784
Cfsegal@roadrunner.com
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Sincerely,
Cindy Stein
647 Flaming Star Ave
Thousand Oaks, Ca 91360
cinfish65@yahoo.com

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Cindy Stein
Thousand Oaks, CA 91360
cinfish65@yahoo.com
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Sincerely,
Claudia Meyer
San Diego, CA 92117
cmeyer46@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Claudia Stein
San Diego, CA 92103
steinwest1@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Clint Freeland
Santa Maria, CA 93455
c_freeland@yahoo.com
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Sincerely,
Cody Dolnick
Joshua Tree, CA 92252
woland92107@yahoo.com
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Sincerely,
Colette Stroud
Los Angeles, CA 90026
colette.kosty@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Colleen Bergh
Santa Ana, CA 92704
colleenbergh@hotmail.com
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Sincerely,
Colleen Lobel
San Diego, CA 92126
clobel1@san.rr.com
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Sincerely,
Colleen Rodriguez
Reseda, CA 91335
ceemoore@peoplepc.com
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Sincerely,

Connie Charles

Cedar City, UT 84720

concharles@yahoo.com
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Sincerely,

Connie Kirkpatrick
Dulzura, CA 91917
conniesowens@gmail.com
Dear Planner Reuben Arceo,

Mr. And Ms.

Please! I live here and I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Connie Munoz
Phelan, CA 92371
conniemunoz12@gmail.com
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Sincerely,
Connie Wood
Mission Viejo, CA 92691
conniemeadville@yahoo.com
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Sincerely,
Corinne Miller
El Cajon, CA 92020
corinnejang@yahoo.com
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Sincerely,
Corry Ridder
Garden Grove, CA 92840
corneliaridder@gmail.com
Following are discussions topics for the meeting tomorrow:

- Sentinel/Butterfield project. I want to go through the Use Permit process to ensure I have a good understanding of the process. Now that the DEIR/EIS is out for public comment, we are optimistic that the other regulatory items will progress.
- White Knob project. I will provide a quick summary regarding mining plans and activities to comply with the COA’s.
- SMARA activities, FACE and annual reports.
- Stockpile fence at Amboy.
- Omya account status. I received some invoices from Lucerne Valley mining representatives. I believe we have paid some but we may be behind with others.
- Other topics from Omya or county stakeholders.

See you tomorrow.

Best Regards

Craig Maetzold
Environmental Affairs Manager

Omya Inc.
9987 Carver Rd, Suite 300
Cincinnati, Ohio 45242
USA
Phone direct: +1 513-387-4696
Mobile: +1 513-535-6930
eMail: Craig.Maetzold@omya.com
Internet: www.omya.com

Skype (Business): Craig.Maetzold

"This message contains information that may be confidential or privileged and is intended only for the individual or entity named above. No one else may disclose, copy, distribute or use the contents of this message. Unauthorized use, dissemination and duplication is strictly prohibited, and may be unlawful. All personal messages express views solely of the sender, which are not to be attributed to Omya AG and its subsidiaries and affiliates. If you received this message in error, please notify the Sender and delete this message."
Thanks for the quick replies. I am scheduling the meeting for 1:00 pm Pacific Time.

From: Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>
Sent: Wednesday, July 25, 2018 2:45 PM
To: Craig Maetzold <Craig.Maetzold@omya.com>
Cc: Kenline, George <George.Kenline@lus.sbcounty.gov>
Subject: RE: Omya Regional Environmental Manager

Hello Craig and congrats to you. I am available on August 7th. See u on August 7th in early afternoon between 12:30 pm and 2:30 pm

Regards.

Please take a moment to complete our 1 Minute Satisfaction Survey [https://www.surveymonkey.com/r/LUS_Email](https://www.surveymonkey.com/r/LUS_Email)

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From: Craig Maetzold <Craig.Maetzold@omya.com>
Sent: Wednesday, July 25, 2018 6:43 AM
To: Kenline, George <George.Kenline@lus.sbcounty.gov>; Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>
Subject: Omya Regional Environmental Manager

Mr. Kenline and Mr. Arceo: My name is Craig Maetzold and I have recently been hired as the Regional Environmental Affairs Manager for Omya. This is the position that was previously held by Shelby Olson. The purpose of this message is to request an introductory meeting at the San Bernardino County offices. During the meeting, I intend to discuss permit, SMARA, and other pertinent regulatory items that involve the county. Following are a few possible dates for the meeting:

- **Tuesday, July 31:** anytime in the morning
- **Thursday, August 2:** Early afternoon between 12:30 pm and 2:30 pm (I have a meeting with Aspen Environmental at 3:00 pm in Upland, CA)
- **Tuesday, August 7:** Early afternoon between 12:30 pm and 2:30 pm

Let me know if any of the schedule options above are acceptable. I will send some specific discussion topics once the schedule is finalized. Contact me with any questions. Thank you.

Best Regards

Craig Maetzold
Environmental Affairs Manager
Graham Stephens

Subject: Omya Regional Environmental Manager
Location: 385 N. Arrowhead Avenue

Start: Tue 8/7/2018 1:00 PM  
End: Tue 8/7/2018 2:00 PM  
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Craig Maetzold

Thanks for the quick replies. I am scheduling the meeting for 1:00 pm Pacific Time.

_____________________________________________
From: Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>
Sent: Wednesday, July 25, 2018 2:45 PM
To: Craig Maetzold <Craig.Maetzold@omya.com>
Cc: Kenline, George <George.Kenline@lus.sbcounty.gov>
Subject: RE: Omya Regional Environmental Manager

Hello Craig and congrats to you. I am available on August 7th. See u on August 7th in early afternoon between 12:30 pm and 2:30 pm

Regards.

Please take a moment to complete our 1 Minute Satisfaction Survey https://www.surveymonkey.com/r/LUS_Email

Reuben Arceo
Planner
Land Use Services Department
Phone: 909-387-4387
Fax: 909-387-3223
385 N. Arrowhead Avenue
San Bernardino, CA 92415-0187

Our job is to create a county in which those who reside and invest can prosper and achieve well-being.
www.SBCounty.gov

County of San Bernardino Confidentiality Notice: This communication contains confidential information sent solely for the use of the intended recipient. If you are not the intended recipient of this communication, you are not authorized to use it in any manner, except to immediately destroy it and notify the sender.
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Craig Maetzold
Environmental Affairs Manager
"This message contains information that may be confidential or privileged and is intended only for the individual or entity named above. No one else may disclose, copy, distribute or use the contents of this message. Unauthorized use, dissemination and duplication is strictly prohibited, and may be unlawful. All personal messages express views solely of the sender, which are not to be attributed to Omya AG and its subsidiaries and affiliates. If you received this message in error, please notify the Sender and delete this message."
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Best Regards

Craig Maetzold
Environmental Affairs Manager

Omya Inc.
9987 Carver Rd, Suite 300
Cincinnati, Ohio 45242
USA
Phone direct: +1 513-387-4696
Mobile: +1 513-535-6930
eMail: Craig.Maetzold@omya.com
Internet: www.omya.com

Skype (Business): Craig.Maetzold

"This message contains information that may be confidential or privileged and is intended only for the individual or entity named above. No one else may disclose, copy, distribute or use the contents of this message. Unauthorized use, dissemination and duplication is strictly prohibited, and may be unlawful. All personal messages express views solely of the sender, which are not to be attributed to Omya AG and its subsidiaries and affiliates. If you received this message in error, please notify the Sender and delete this message."
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Craig Nelson
Yucca Valley, CA 92284
cnelson2961@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cybele Knowles
Tucson, AZ 85716
cybeleknowles@gmail.com
Dear Planner Reuben Arceo,

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These places of natural beauty must be protected and saved, period.

Sincerely,
Cynthia Hernandez
Los Angeles, CA 90001
sunnycielo6@gmail.com
Graham Stephens

From: catjunky@everyactioncustom.com on behalf of Cynthia Kane  
<catjunky@everyactioncustom.com>
Sent: Saturday, August 25, 2018 12:18 AM
To: Arceo, Reuben
Subject: Please, No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cynthia Kane
San Juan Capistrano, CA 92675
catjunky@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cynthia Knoke
Valley Center, CA 92082
cydlcsw@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Cynthia Rajsbaum
San Diego, CA 92130
Rajsbaum@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
D R Spencer
San Diego, CA 92104
sdspence@pacbell.net
Dear Planner Reuben Arceo,

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Sincerely,
D. Fachko
Buena Park, CA 90621
DFachko@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Dace Brown
San Diego, CA 92115
dacelbrown@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Dale Powell
Riverside, CA 92507
dajrpowell@msn.com
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Sincerely,
Dale Wright
Ramona, CA 92065
dwramona@gmail.com
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Sincerely,
Dalia Salgado
Los Angeles, CA 90017
adthdfyr@aol.com
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Sincerely,
Dan Matthews
Valley Center, CA 92082
1danmatt@gmail.com
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Sincerely,
Dan Morgan
Rosamond, CA 93560
nasaduck@gmail.com
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Sincerely,
Dan Perdios
Palm Springs, CA 92262
danpinps@aol.com
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Sincerely,
Dana Monroe
San Diego, CA 92104
danamonroe@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Dani Brusius
Oak Park, CA 91377
3orangecat3@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Daniel Tyson
Simi Valley, CA 93065
profloran@roadrunner.com
Dear Planner Reuben Arceo,

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Sincerely,
Danielle Sanchez
San Bernardino, CA 92404
drsanchez84@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Danni Sanchez
Oceanside, CA 92057
d.sanchez@cox.net
Dear Planner Reuben Arceo,

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Sincerely,

Danny Greene
Escondido, CA 92025
dsearch50@yahoo.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Daphne Figueroa
San Diego, CA 92107
drdaph@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Daphne McNair
San Diego, CA 92101
daphnemcnair01@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Darcy Wright
Vista, CA 92081
darcysf@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Darius Fattahipour
San Diego, CA 92127
fattahipour@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Darlene Wilson
Corona, CA 92880
dwilson016@ca.rr.com
Graham Stephens

From: davecowan@everyactioncustom.com on behalf of Dave Cowen
Sent: Friday, August 24, 2018 10:33 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Dave Cowen
San Diego, CA 92127
davecowan@mac.com
Dear Planner Reuben Arceo,

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Sincerely,
David Beck
San Juan Capistrano, CA 92675
dwbeck7815@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
David Brantley
El Cajon, CA 92020
ddbrantley@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
David Broadwater
Atascadero, CA 93422
csi@thegrid.net
Dear Planner Reuben Arceo,

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Sincerely,
David Carlson
Carlsbad, CA 92009
dnjcarlson@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
David Councilman MD
Minneapolis, MN 55426
davidcouncilman7@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
David Cupples
Joshua Tree, CA 92252
davidcdusty@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
David Foulger
Apple Valley, CA 92307
dave.foulger@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
David Kurkjian
Van Nuys, CA 91411
dkurk@thebrothersz.com
Dear Planner Reuben Arceo,

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Sincerely,
David Peterson
San Diego, CA 92116
pete23152@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
David R Crawford
San Diego, CA 92129
davidcrawford3003@att.net
Dear Planner Reuben Arceo,

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Sincerely,

David Roberts
Oxnard, CA 93035
themightylithuanian@gmail.com
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Sincerely,
David Sargood
San Marcos, CA 92078
davdsargood69@gmail.com
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Sincerely,
David Smith
Irvine, CA 92617
dasmith@uci.edu
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Sincerely,
David Thieke
Derwood, MD 20855
david.thieke50@yahoo.com
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Sincerely,
David Walker
Santa Barbara, CA 93105
walkercreations@verizon.net
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Sincerely,
David Wappler
Ojai, CA 93023
david.wappler@gmail.com
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Sincerely,
Dean Leavitt
Lemon Grove, CA 91945
dhleavitt@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Dean Webb
Seattle, WA 98199
dm_webb@live.com
Dear Planner Reuben Arceo,

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Sincerely,
Deanna Doull
Riverside, CA 92505
dd80scraze64@hotmail.com
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Sincerely,
Deanna Sanchez
Hemet, CA 92543
strabezzie@yahoo.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Debbie Farrell
Brea, CA 92821
kendf60@roadrunner.com
Dear Planner Reuben Arceo,

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Sincerely,
Debbie Williams
Menifee, CA 92586
debbiedoesfinance@yahoo.com
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Sincerely,
Debby Anderson
Santa Barbara, CA 93109
debventure@yahoo.com
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Sincerely,
Debi Griepsma
Fontana, CA 92336
debiane3@gmail.com
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debiane3@gmail.com
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Sincerely,
Deborah Bortot
Fontana, CA 92335
uncledebbie3@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Deborah Brin
Newport Beach, CA 92660
deborah@brin.org
Dear Planner Reuben Arceo,

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Sincerely,
Deborah Iannizzotto
Escondido, CA 92027
djianniz@yahoo.com
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Sincerely,
Deborah Knight
San Diego, CA 92122
dknight3@san.rr.com
Dear Planner Reuben Arceo,

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Sincerely,
Deborah Lancman
San Diego, CA 92104
lucylanc@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Deborah Olstad
San Diego, CA 92122
dolstad300@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Deborah Smith
Huntington Beach, CA 92649
hardmoney1@live.com
Dear Planner Reuben Arceo,

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Sincerely,
Deborah Tonn
San Bernardino, CA 92407
Bare22bear@me.com
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Sincerely,
Deborah Voves
Anchorage, AK 99516
dkvoves@gci.net
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Sincerely,
Debra Barringer
Santa Barbara, CA 93105
debrabarringer2@gmail.com
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Sincerely,
Debra Robinson
Yucca Valley, CA 92284
troubleismyname2u4me@icloud.com
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Sincerely,
Delores Yanko
Hemet, CA 92543
dyanko1@roadrunner.com
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Sincerely,
Denise Webster
San Clemente, CA 92673
dwebster4health@gmail.com
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Sincerely,
Dennis Allen
Santa Barbara, CA 93103
dallen@buildallen.com
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Sincerely,
Dennis Brand
Santa Barbara, CA 93101
chachmonkey@gmail.com
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Sincerely,

Dennis Lees
Encinitas, CA 92024
dennislees@cox.net
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Sincerely,
Dennis Owen
Huntington Beach, CA 92647
owendowend@icloud.com
Dear Planner Reuben Arceo,

The plan to mine cannot be shortsighted, ill-informed, or geared to prioritize profits and personal gain, over wildlife and the preservation of our natural world. I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Derich Wittliff
Los Angeles, CA 90065
derich@me.com
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Sincerely,
Destiny Diaz
Bloomington, CA 92316
dezzyqueen@gmail.com
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Sincerely,
Diana Alexander
San Diego, CA 92101
1031diana@gmail.com
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Sincerely,
Diana Ekholm
Simi Valley, CA 93063
diana.shycoff@yahoo.com
From: dlynrod@everyactioncustom.com on behalf of Diana Rodgers
<dllyd@dlynrod@everyactioncustom.com>
Sent: Friday, August 24, 2018 4:43 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Diana Rodgers
Mission Viejo, CA 92691
dlynrod@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Diane Jackson
La Habra, CA 90631
varda532@mail.com
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Sincerely,
Diane McDowell
Fullerton, CA 92833
diane11185@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Dianna Ibarra
El Monte, CA 91732
dianna_ibarra@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Dianna Wallace
Lake Isabella, CA 93240
diannaw62@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Dianne Ostrow
Wrightwood, CA 92397
ostrowdj@gmail.com
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Sincerely,
DON WILLIAMSON
Anza, CA 92539
WILLIAMSON@AOL.COM
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Sincerely,
Donald Fischer
Running Springs, CA 92382
xcountrydon@charter.net
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Sincerely,
Donald Fosket
Carlsbad, CA 92010
donfosket@gmail.com
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Sincerely,
Donna Grampp
Fullerton, CA 92831
dgrampp@beckman.com
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Sincerely,
Donna Hunt
Atascadero, CA 93422
dthegidget@gmail.com
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Sincerely,
Donna Shaw
Simi Valley, CA 93065
dshaw77708@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Donna Thornbury
Yucca Valley, CA 92284
dst889719@gmail.com
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Sincerely,
Donna Uyeno
Carlsbad, CA 92011
donnauyeno@gmail.com
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Sincerely,
Dora Schuster
Buena Park, CA 90620
dschu4@sbcglobal.net
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Sincerely,
Dorinda Kelley
Portland, OR 97213
dorindask@gmail.com
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Sincerely,
Doris Roth
Victorville, CA 92395
dotyr345@charter.net
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Sincerely,
Dorothy Duffy
Palm Springs, CA 92264
Deauville1942@gmail.com
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Sincerely,
Dorothy Kamins
Beverly Hills, CA 90210
dorothy@pkdkamins.com
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Sincerely,
Dorrine Marshall
Irvine, CA 92620
quitetherebel@hotmail.com
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Sincerely,
Doug Scheel
Los Osos, CA 93402
j-j-j@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Douglas McCormick
Trabuco Canyon, CA 92679
mfiinsure@cox.net
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Sincerely,
Dr Desantis
Los Angeles, CA 90024
ultraphonique@yahoo.com
Dear Planner Reuben Arceo,

As a concerned American citizen and California resident I very strongly urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Dr. Mha Atma S Khalsa
Los Angeles, CA 90035
earthactionnetwork@earthlink.net
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Sincerely,
Duke Spaldinjg
Bakersfield, CA 93308
dukespalding@aol.com
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Sincerely,
Dulce Valdez
Perris, CA 92570
dulce.adilene7@gmail.com
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Sincerely,
E K
Joshua Tree, CA 92252
elisekost@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Earl Frounfelter
Santa Maria, CA 93454
efrounfelter@yahoo.com
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Sincerely,
Edmund Dantez de Guerrero
Cathedral City, CA 92234
edro3638@dc.rr.com
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Sincerely,
Edward Gowens
San Diego, CA 92101
edlgowens@aol.com
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Sincerely,
Edward Maupin
San Diego, CA 92103
edmaupin@usa.net
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Sincerely,
Eileen Muzzarelli
Studio City, CA 91604
lamiacanina3@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Ela Nolan
Murrieta, CA 92562
elanolan@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Elaine Barrett
San Diego, CA 92103
tabbysmom@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Elaine Benjamin
Alpine, CA 91901
ebalpine@flash.net
Dear Planner Reuben Arceo,

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Sincerely,
Elaine Edell
Thousand Oaks, CA 91362
elaine@edellproductions.com
Graham Stephens

From: elgenasci@everyactioncustom.com on behalf of Elaine Genasci
<elgenasci@everyactioncustom.com>
Sent: Friday, August 24, 2018 7:34 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Elaine Genasci
San Luis Obispo, CA 93405
elgenasci@gmail.com
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Sincerely,
Elena Hernandez
Long Beach, CA 90810
rockonstellarppl@gmail.com
Hi Maya and Reuben – I’m off for the day (week) and just checking in on this briefly at Jody’s request. The contact at Center for Biological Diversity I spoke with this morning is Lisa Belenky, lbelenky@biologicaldiversity.org. Please work directly with Lisa to request that they divert email comments and compile to disk. I know you are annoyed, but please be civil in making this request. S

From: Maya Rohr [mailto:mrohr@sespeconsulting.com]
Sent: Friday, August 24, 2018 10:23 AM
To: Noiron, Jody -FS <jnoiron@fs.fed.us>; Eliason, Scott -FS <seliason@fs.fed.us>; Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>
Cc: John Hecht <jhecht@sespe.com>
Subject: RE: Omya email blitz

Jody – actually the emails have not stopped coming in to me either. Apparently they just got backed up or something – still getting several every minute or so.

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com

From: Noiron, Jody -FS [mailto:jnoiron@fs.fed.us]
Sent: Friday, August 24, 2018 9:35 AM
To: Eliason, Scott -FS; Maya Rohr; Arceo, Reuben
Subject: RE: Omya email blitz

They stopped 😊 you worked magic!! thx
I wanted to let you know that I reached Lisa Belenky at CBD and requested that they stop the form letters currently blowing up your inboxes and compile them on a disk to send to me. Hopefully that will happen very soon. Scott

Scott Eliason
Botanist
Forest Service
San Bernardino National Forest
Mountaintop District
909-382-2830
seliason@fs.fed.us
41374 North Shore Drive, PO Box 290
Fawnskin, CA 92333
www.fs.usda.gov/sbnf

Caring for the land and serving people

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
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Sincerely,
Elisabeth Armendarez
Santa Ana, CA 92703
elisabethneef@gmail.com
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Sincerely,
Elizabeth Bailey
Encinitas, CA 92024
carmelbodhi@hotmail.com
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Sincerely,
Elizabeth Chen
Goleta, CA 93117
earldcelestial@gmail.com
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Sincerely,
Elizabeth Everhart
Los Angeles, CA 90068
joni874@aol.com
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Sincerely,
Elizabeth Gann
Cedar Glen, CA 92321
elizabethgann@yahoo.com
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Sincerely,
Elizabeth Hart Hart
Encinitas, CA 92024
bhart308@yahoo.com
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Sincerely,
Elizabeth Herner
Menifee, CA 92586
elizabethherner@yahoo.com
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Sincerely,
Elizabeth Jache
Lemon Grove, CA 91945
esheltie@hotmail.com
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Sincerely,
ELIZABETH Kat
Rialto, CA 92376
parisake@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Elizabeth Ladiana
Ventura, CA 93003
lizzard55@gmail.com
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Sincerely,
Elizabeth Levin
Tustin, CA 92780
christofftemplar1985@gmail.com
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Elizabeth Mather
San Diego, CA 92129
elizabet.mather@sbcglobal.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Elizabeth Reilly
Calabasas, CA 91302
reilleyequine@aol.com
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Sincerely,
Elizabeth Reyes
Laguna Woods, CA 92637
betsyreyes@gmail.com
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Sincerely,
Ellen Dollar
San Luis Obispo, CA 93401
dddollar@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Ellen McCann
Escondido, CA 92027
ellenmccann63@hotmail.com
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Sincerely,
Elliott Sernel
Palm Springs, CA 92262
esernel@pacbell.net
Dear Planner Reuben Arceo,

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Sincerely,
Elvira Craioveanu
Downey, CA 90241
elv1rac74@outlook.com
Dear Planner Reuben Arceo,

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Sincerely,

Enrique Espinosa
Chula Vista, CA 91912
hnri2001@yahoo.com
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Sincerely,
Eric Melendez
Westminster, CA 92683
cwip23@hotmail.com
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Sincerely,
Erika Kvande
Riverside, CA 92506
ishtar332@aol.com
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Sincerely,
Erin Roedeinger
San Diego, CA 92107
magnoliainmay@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Ernesto Vizcaino
Bonita, CA 91902
ainaesty@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Ethan Teller
Altadena, CA 91001
jefesegundo@gmail.com
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Sincerely,
Ethan Zachadnyk
La Jolla, CA 92037
ethantax1234@gmail.com
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Sincerely,
Eugene Elander
Los Angeles, CA 90068
eelander@brenau.edu
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Sincerely,
Eva Hofberg
Anaheim, CA 92802
evah@phenxint.com
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Sincerely,
Evan Fernandez
Lawndale, CA 90260
efernandez@breeneng.com
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Sincerely,
Eve Lyman
Van Nuys, CA 91405
evelyman@gmail.com
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Sincerely,
Evelyn Ahumada
Garden Grove, CA 92840
eahumada2007@yahoo.com
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Sincerely,

Evelyn Greenwald
San Luis Obispo, CA 93401
hgreenwa@calpoly.edu
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Sincerely,
Everardo Flores
San Diego, CA 92115
Lgoline62@yahoo.com
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Sincerely,
Faith Clark
Oceanside, CA 92057
fltc1839@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Faye Gregory
Colton, CA 92324
jazzngems@yahoo.com
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Sincerely,
Felena Puentes
Bakersfield, CA 93312
fpuentes19@att.net
Dear Planner Reuben Arceo,

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Sincerely,
Felicia E.L. Houle
Mojave, CA 93502
desertskiespalette@gmail.com
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Sincerely,
Ferne Gold
Encinitas, CA 92024
fernegold156@gmail.com
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Sincerely,
Fran Fulwiler
Portland, OR 97213
frannyf11@comcast.net
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Frances Balcomb
Los Angeles, CA 90042
francesbalcomb@wildblue.net
Dear Planner Reuben Arceo,

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Sincerely,
Frances Whiteside
Montclair, CA 91763
fbwhites@gmail.com
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Sincerely,
francois pille
94600
lecatandree@free.fr
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Sincerely,
Frank Barrachina
Pinon Hills, CA 92372
Frankbarrachina@aol.com
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Sincerely,
Frank Richards
Redlands, CA 92373
richshup@gmail.com
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Sincerely,
Fred Lohmann
Adelanto, CA 92301
fredlohmann66@gmail.com
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Sincerely,
Frithjof Kuepper
Santa Barbara, CA 93106
fkuepper@abdn.ac.uk
Dear Planner Reuben Arceo,

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Sincerely,

g M
Afton, MN 55001

gaby.mayer@shaw.ca
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Sincerely,
Gabriel F
Oxnard, CA 93036
gabriel5350@ca.rr.com
Dear Planner Reuben Arceo,

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Sincerely,
Gail Brady
Camarillo, CA 93012
gailbrady3@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Gail Cane
Woodland Hills, CA 91367
gailcanehomes@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Gail Garcia
Fountain Valley, CA 92708
GailCat3ScholzGarcia@gmail.com
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Sincerely,
Gail McMullen
Los Angeles, CA 90027
gjmc48@yahoo.com
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Gail Roberts
Tecate, CA 91980
igailroberts@gmail.com
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Sincerely,
Gale Kirk
Newport Beach, CA 92660
galekirk1@gmail.com
Beautiful text that conveys a powerful message in a professional tone.

Graham Stephens

From: garrettlandon@everyactioncustom.com on behalf of Garrett Mann
<garrettlandon@everyactioncustom.com>
Sent: Friday, August 24, 2018 1:40 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

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Sincerely,
Garrett Mann
San Diego, CA 92129
garrettlandon@gmail.com
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Sincerely,
Gary Beckerman
Santa Ynez, CA 93460
rocksnfr@comcast.net
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Sincerely,
Gary Karns
San Diego, CA 92117
garykjr2@sbcglobal.net
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Sincerely,
Gary Kuehn
Newhall, CA 91321
bugsnworms43@gmail.com
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Sincerely,
Gary Reese
San Clemente, CA 92673
reefster2@aol.com
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Sincerely,
Gayle Harvey
Morro Bay, CA 93442
474m.bay@gmail.com
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Sincerely,
Gene Newman
San Diego, CA 92115
gene.newman3@aol.com
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The large open pits around north western part of Upland and the northern part of Clair mount are a prime example of why this project should not be allowed. Those pits have been abandon for over 50 years and they are now a useless piece of land that will be an eye sore for another 100 years.

Sincerely,
Gene W Waggoner II
Pinon Hills, CA 92372
sagwaggs@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Geness Lorien
Santa Barbara, CA 93101
Genesslorien@gmail.com
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Sincerely,
Genevieve Herrick
Santa Ynez, CA 93460
jennieherrick@gmail.com
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Sincerely,
Geoffrey Collins
Garden Grove, CA 92845
collins_family1@hotmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
George F. Klipfel II
Cathedral City, CA 92234
gklipfel@msn.com
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Sincerely,
Georgia Labey
Indio, CA 92203
Georgia.labey@gmail.com
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Sincerely,
Georgre Costa
Santa Barbara, CA 93101
psyclone13@gmail.com
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Sincerely,
Geraldine May
Creston, CA 93432
huerhuero@aol.com
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Sincerely,
Gernot Trolf
San Diego, CA 92109
gernottrolf@yahoo.com
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Sincerely,
Gia Olaes
Los Angeles, CA 90016
golaes@minorityaidsproject.org
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Giana paz
Hendersonville, NC 28792
Gianapp@yahoo.com
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Sincerely,
Gidon Singer
San Diego, CA 92107
gidonsinger@gmail.com
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Sincerely,

Gina Anson
Orange, CA 92863

g.anson@mac.com
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Sincerely,
Gina Brown Pettay
Covina, CA 91722
ge004747@gmail.com
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Sincerely,
Gina Carollo
San Diego, CA 92103
gfc223@yahoo.com
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Sincerely,

Gina Mori
Arroyo Grande, CA 93420
winamarieag@aol.com
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Sincerely,
Glenn Kalleberg
Aliso Viejo, CA 92656
gakalleberg@gmail.com
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Sincerely,
Glenn Ostergaard
Rancho Mirage, CA 92270
Glennoco@aol.com
Dear Planner Reuben Arceo,

As a Professor Emeritus of Zoology and Environmental Science, I am writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Thank you for your attention to my comments!

Sincerely,
Glenn R. Stewart
La Verne, CA 91750
grstewart@cpp.edu
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Sincerely,
Gordon Cook
Bakersfield, CA 93309
gcook1489@yahoo.com
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Sincerely,
Gordon Gus
Solana Beach, CA 92075
info@mindtg.com
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Sincerely,
Grace Cunningham
Camarillo, CA 93010
gracen0915@yahoo.com
Dear Planner Reuben Arceo,

Protect our forests for the animals that live in them.

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Sincerely,
Grace Jackson
Carpinteria, CA 93013
gracejks@gmail.com
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Sincerely,
Grant Smith
Thousand Oaks, CA 91360
Smithgrant.la@gmail.com
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Sincerely,
Greg Bishop
Los Alamitos, CA 90720
konabish@hotmail.com
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Sincerely,
Greg Schuett
Julian, CA 92036
gbschuett@gmail.com
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Sincerely,
Greta Meyerhof
San Clemente, CA 92672
gretameyerhof@gmail.com
Reuben,

I have the same question on Omya’s revision AP20150104 (Amboy) as the previous time tracker question....

I showed this closed in 2016, but see new charges stemming from May of this year....Can you let me know if that is accurate?
From: Arceo, Reuben  
Sent: Tuesday, August 07, 2018 8:37 AM
To: Griffith, Rosie - LUS <Rosie.Griffith@lus.sbcounty.gov>  
Subject: RE: Correct Charges?

Hi Rosie, as to the charges. I spent some time discussing the Sigma Clay Reclamation Plan with DMR. That’s why I charged Sigma Clay. The searles valley mine project has been in process since 2011 and I received the project in 2013. There are similar contrasts between the searles valley reclamation plan and sigma clay. Beth Hendrickson with DMR was helping me understand the contrast between the two reports so that the applicant could correctly update the report. The searles valley reclamation plan has not been finalized by DMR. Am working on finalizing the project with DMR.

Hope that help Rosie. Its been very useful for me to reexamine approved reclamation plans and the process of approval with DMR.

Please take a moment to complete our 1 Minute Satisfaction Survey [https://www.surveymonkey.com/r/LUS_Email](https://www.surveymonkey.com/r/LUS_Email)

Reuben Arceo  
Planner  
Land Use Services Department  
Phone: 909-387-4387  
Fax: 909-387-3223  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

Our job is to create a county in which those who reside and invest can prosper and achieve well-being.  
www.SBCounty.gov  

County of San Bernardino Confidentiality Notice: This communication contains confidential information sent solely for the use of the intended recipient. If you are not the intended recipient of this communication, you are not authorized to use it in any manner, except to immediately destroy it and notify the sender.

From: Griffith, Rosie - LUS  
Sent: Monday, August 6, 2018 4:15 PM  
To: Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>  
Subject: Correct Charges?

Hi Reuben,

I’m going through mining invoices again and noticed some charges that seemed a bit off. We had no activity on AP20120001 since December 2014. All of a sudden, we started charging against the project again in Dec 2017 - May 2018. AP20120001 is for the Sigma Clay mine was the approved 11/6/2014. Can you verify if the charges from 12/2017-5/2018 are actually supposed to be applied to this project or possibly another project?

Thanks.

Please take a moment to complete our 1 Minute Satisfaction Survey [https://www.surveymonkey.com/r/LUS_Email](https://www.surveymonkey.com/r/LUS_Email)

Rosie Griffith  
Senior Land Use Technician  
Land Use Services Department  
Phone: 909-387-8311  
Fax: 909-387-3223  
385 N. Arrowhead Ave  
San Bernardino, CA, 92415-0187
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

Gudrun Ulman
Escondido, CA 92029
timulman@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Guillermo Bermudez
Los Osos, CA 93412
freewillie810@gmail.com
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Sincerely,
Gwen Bell
Ojai, CA 93023
gwendolynbell1@yahoo.com
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Sincerely,
Hana Correa
La Quinta, CA 92253
hanacorrea1@yahoo.com
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Sincerely,
Harlene Goodrich
Seal Beach, CA 90740
jacman5@aol.com
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>>>clean air, clean water, clean soil for everyone. mining pollutes soil and water, so ban it.<<<<

Sincerely,

Harry Knapp
Riverside, CA 92507
h.knapp@charter.net
Dear Planner Reuben Arceo,

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mines pollute soil and water. clean soil, clean water, clean air for everyone. ban mining , fracking herbicides, and pesticides.

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Riverside, CA 92507
h.knapp@charter.net
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Sincerely,
Heather Abbey
Hawthorne, CA 90251
etheather@earthlink.net
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Sincerely,
Heather Lutz
Dana Point, CA 92629
heathbar271@yahoo.com
Graham Stephens

From: heidilynn@everyactioncustom.com on behalf of Heidi Lynn
        <heidilynn@everyactioncustom.com>
Sent: Friday, August 24, 2018 8:14 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Heidi Lynn
Spring Valley, CA 91977
heidilynn@nethere.com
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Sincerely,
Heidi Palmer
Rancho Cucamonga, CA 91739
Heidijpalmer@yahoo.com
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Sincerely,
Heidi Ward
Van Nuys, CA 91406
heidiward18@gmail.com
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Sincerely,
Helen Manning-Brown
Atascadero, CA 93422
helenmb@verizon.net
Hi all,

I just returned from leave but so far No comments here that I can see, however I do have a message from a reporter from the Daily Press about a media inquiry. I am waiting to talk with our public affairs officer on a reply. I will keep you posted....

Tasha Hernandez, Forester
Environmental Coordinator
Forest Service
San Bernardino National Forest
p: 909-382-2905
f: 909-383-5770
thernandez@fs.fed.us
602 S Tippecanoe Ave
San Bernardino, CA 92408
www.fs.fed.us

Caring for the land and serving people

From: Maya Rohr [mailto:mrohr@sespeconsulting.com]
Sent: Wednesday, August 8, 2018 3:42 PM
To: Craig Maetzold <Craig.Maetzold@omya.com>; Eliason, Scott -FS <seliason@fs.fed.us>; Hernandez, Tasha -FS <thernandez@fs.fed.us>; Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>
Cc: John Hecht <jhecht@sespe.com>; Graham Stephens <gstephens@sespeconsulting.com>; Scott Cohen <scohen@sespeconsulting.com>; Kenline, George <George.Kenline@lus.sbcounty.gov>
Subject: Omya Butterfield Sentinel Comment Letter AQMD

Hi All

We just got our first comment letter on the Draft EIR/EIS for Butterfield Sentinel. It is from the Mojave Desert AQMD and does not present any significant issues. They have requested a few additional mitigations for dust which are primarily complying with their existing regulations (we have already said we would comply with all applicable regulations). I asked Scott Cohen to prepare a response and I will forward that once he has a draft.

Has anyone else received any comments?? Since my name is on the NOA they should only come to me but you never know.

Thank you.

Maya Rohr
Sespe Consulting, Inc.
This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
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Sincerely,
Hilda Knowles
Ventura, CA 93004
moraknow@gmail.com
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Sincerely,
Holly Crawford
Orange, CA 92865
holycrawfordb@hotmail.com
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Sincerely,
Holly Hall
Temecula, CA 92592
hahall51@verizon.net
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Sincerely,
Honey Sheridan
San Diego, CA 92122
1purehoney@gmail.com
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Sincerely,
Honey Sheridan
San Diego, CA 92122
1purehoney@gmail.com

From: 1purehoney@everyactioncustom.com on behalf of Honey Sheridan
<S1purehoney@everyactioncustom.com>
Sent: Friday, August 24, 2018 8:03 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion
Dear Planner Reuben Arceo,

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Sincerely,
Ilya Turov
Moreno Valley, CA 92555
iturov@yahoo.com
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Sincerely,
Irene Chennell
Escondido, CA 92026
stiedemann@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Irene Lopez
San Diego, CA 92110
adolfolopez13@gmail.com
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Sincerely,
Isabel Cervera
Salisbury, NC 28147
isabellacer@hotmail.com
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Sincerely,
Ivan Halperin
La Jolla, CA 92037
iwh@halperin.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

J. Phillips

Middleton, WI 53562

jkphilli@wisc.edu
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Sincerely,
Jackee Van Akin
Covina, CA 91722
lilbitodat85@yahoo.com
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Sincerely,
Jackie Pope
Atascadero, CA 93422
jackiepope@gmail.com
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Sincerely,
Jackie Straub
Santee, CA 92071
Jackiestraub1@gmail.com
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Sincerely,
Jaclyn Lewis
Fullerton, CA 92835
mauijoy99@aol.com
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Sincerely,
Jacque Emel
Redlands, CA 92373
jemel7@gmail.com
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Sincerely,
Jacqueline Boydstun
Buena Park, CA 90620
jjboydstun@att.net
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Sincerely,
Jacqueline McVicar
San Diego, CA 92115
jacqueline.mcvicar@gmail.com
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Sincerely,
Jaimy Sprissler
Imperial Beach, CA 91932
jaimymay1122@gmail.com
Dear Planner Reuben Arceo,

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I am a former Dept of Agriculture biologist and this is my professional opinion.

Sincerely,
James Bott
Bonita, CA 91902
jbott@compuserve.com
Dear Planner Reuben Arceo,

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Sincerely,

James Harris
Irvine, CA 92604
echair1@cox.net
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Sincerely,

James Mulcare
Clarkston, WA 99403
xsecretsx@cableone.net
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Sincerely,
James Noordyk
San Diego, CA 92109
jnoordyk4sdhomes@aol.com
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jnoordyk4sdhomes@aol.com
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Sincerely,
James Susha
Oxnard, CA 93036
jsusha08@gmail.com
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Sincerely,
Jamie Brozovich
Glendale, CA 91205
jamie1179@gmail.com
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Sincerely,

Jamie Green
Ventura, CA 93004
springhead@qnet.com
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Sincerely,
Jamie Kurnik
San Clemente, CA 92672
Amiejlyn@hotmail.com
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Jamie Lawrence
Los Angeles, CA 90027
tejamie@gmail.com
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Sincerely,
Jamie Simon
Encinitas, CA 92024
jsimon@salk.edu
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Sincerely,
Jan De Bont
Beverly Hills, CA 90212
deontj@aol.com
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Sincerely,
Jane Daniels
Moorpark, CA 93021
quack@drewdaniels.com
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Sincerely,
Jane Truman
San Diego, CA 92117
jane.truman@gmail.com
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Sincerely,

Janean Buschmann
Beaumont, CA 92223
spikes_mom10@yahoo.com
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Sincerely,

Janet Lee Beatty
San Luis Obispo, CA 93401
janettheplanetjanet@aol.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Janet Rhodes
Cathedral City, CA 92234
janetrhodes1@msn.com
Dear Planner Reuben Arceo,

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Sincerely,
Janet Vandenburg
San Clemente, CA 92672
janetvandenburg@gmail.com
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Sincerely,
Janet Wheeler
Murrieta, CA 92563
janetwheeler95@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Janice Bartlett
San Diego, CA 92122
johnc_bartlett@msn.com
From: Babamoon1@everyactioncustom.com on behalf of Janice Cleary <Babamoon1@everyactioncustom.com>

Sent: Friday, August 24, 2018 9:49 AM

To: Arceo, Reuben

Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

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Sincerely,

Janice Cleary
Thousand Oaks, CA 91360
Babamoon1@gmail.com
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Sincerely,
Janice E. Farry-Menke
Cambria, CA 93428
jhmenke@aol.com
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Sincerely,
Janine Comrack
Ojai, CA 93023
janine@ojaimail.net
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Sincerely,
Janiri Lucatero
Fontana, CA 92335
hjaniri@gmail.com
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Sincerely,
Janny Vogel
Oceanside, CA 92057
Jannyvogel@gmail.com
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Sincerely,
Jasha Stanberry
Santa Barbara, CA 93108
jasha@studioluminous.net
Dear Planner Reuben Arceo,

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Sincerely,
Jason Shepherd
Newbury Park, CA 91320
jshep13@hotmail.com
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Sincerely,
Javier Rivera
Brooklyn, NY 11249
javierocker@aol.com
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Sincerely,
jay falconer
Long Beach, CA 90806
jayfalconer@live.com
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Sincerely,
Jean Nunamaker
Santee, CA 92071
jean9212@cox.net
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Sincerely,
Jeanette Snow
Oceanside, CA 92058
jeanettesnw@yahoo.com
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Jeanne Turrigiano
Cathedral City, CA 92234
jandlatthemaze@aol.com
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Sincerely,
Jeanne Zeltner
Oceanside, CA 92056
jzeltner31@gmail.com
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Sincerely,
Jeannette Welling
Thousand Oaks, CA 91362
bongodrum@gmail.com
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Sincerely,
Jeannie Pollak
Oxnard, CA 93036
jeannie22ster@gmail.com
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Jeff Pantukhoff
San Clemente, CA 92672
whaleman@maui.net
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Sincerely,
Jeff Thayer
San Diego, CA 92117
scubapong@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Jeff Wells
San Diego, CA 92116
hznfrst@yahoo.com
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Sincerely,
Jeffery Olson
Vista, CA 92084
luckyolsun@yahoo.com
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Sincerely,
Jelica Roland
52420
jroland@email.t-com.hr
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Sincerely,

Jene Kalevor
Costa Mesa, CA 92626
princessjene03@yahoo.com
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Sincerely,
Jenna Bell
La Verne, CA 91750
jenna@kennebell.net
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Jennie Boner
Riverside, CA 92503
rescuelover_21@aol.com
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Sincerely,

Jennifer Bedrosian
Palm Desert, CA 92260
jpen1470@gmail.com
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Sincerely,
Jennifer Chambers
Escondido, CA 92025
uclajen@hotmail.com
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Sincerely,
Jennifer Corrigan
Newbury Park, CA 91320
jenalah@netscape.net
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Sincerely,
Jennifer Green
Murrieta, CA 92563
tigerlover5650@gmail.com
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Sincerely,
Jennifer Johnson
La Jolla, CA 92037
jmoitoza@gmail.com
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Sincerely,

Jere Wilkerson
Avila Beach, CA 93424
jerewilk@icloud.com
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Sincerely,
Jereme Palos
Palm Desert, CA 92260
jereme.joel@yahoo.com
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Sincerely,
Jerid Anderson
Santa Maria, CA 93454
jeridanderson@gmail.com
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Sincerely,
Jerry Napombhejara
Irvine, CA 92620
napombhejara@gmail.com
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Sincerely,
Jesse Abrams
Irvine, CA 92614
Jesse_Abrams@alumni.hmc.edu
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Sincerely,
Jessica Burton
Riverside, CA 92501
jmburton14@gmail.com
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Sincerely,
Jessica De Ruiter
Los Angeles, CA 90039
jessica@jessicaderuiter.com
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Sincerely,
Jessica Paolini
Valencia, CA 91355
jessica2seven@gmail.com
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Sincerely,

Jessie Root
Vista, CA 92084
shadeofgreen27@gmail.com
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Sincerely,

Jill Sykes
Los Angeles, CA 90046
infojill@jillsykes.com
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Sincerely,
Jim Kilby Kilby
Escondido, CA 92026
jimkilby@usa.net
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Sincerely,
Jim Moseman
San Diego, CA 92131
jmoseman@san.rr.com
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Sincerely,
Jim Murphy
San Diego, CA 92123
jmurphy121@hotmail.com
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Sincerely,
Jim Peugh
San Diego, CA 92106
peugh@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Jimmie Lunsford
San Diego, CA 92176
jimmieleelunsford@yahoo.com
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Sincerely,

Jinx Hydeman
Trabuco Canyon, CA 92679
jh.creativeecho@hotmail.com
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Sincerely,
Jo Presbury-Smith
Vista, CA 92084
jpresburysmith@cox.net
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Sincerely,
Joan Combes
Huntington Beach, CA 92648
joanmranger@gmail.com
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Sincerely,
Joan Miller
Laguna Niguel, CA 92677
jem99876@gmail.com
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Sincerely,
Joan Paul and PJ Sullivan
Ventura, CA 93003
punkinsullivan4@aol.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Joanne Birdwhistell
La Jolla, CA 92037
joannebirdwhistell@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Joanne Britton
San Diego, CA 92115
jmbrtton@ymail.com
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Sincerely,
Joanne Cohen
San Diego, CA 92117
joacohen@yahoo.com
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Sincerely,
Joanne Pennington
San Clemente, CA 92672
rp92672@gmail.com
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Sincerely,
JoAnne Schontzler
Carlsbad, CA 92011
jojack760@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Joanne Tenney
Escondido, CA 92026
joannetenney@hotmail.com
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Sincerely,
Joanne Thielen
Banning, CA 92220
joanne.thielen57@gmail.com
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Banning, CA 92220
joanne.thielen57@gmail.com
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Sincerely,

Joe Cuviello
Solana Beach, CA 92075
joe@cuviello.com
Dear Planner Reuben Arceo,

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Sincerely,
Joe Glaston
Desert Hot Springs, CA 92240
vidiot49@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

Joe Vecchi
Garden Grove, CA 92840
joevecchi@yahoo.com
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Sincerely,

Joel Klayman
Huntington Beach, CA 92649
Joelk2020@gmail.com
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Sincerely,
John Charbonneau
Spring Valley, CA 91977
johncterryc@sbcglobal.net
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Sincerely,
John Dutton
Santa Barbara, CA 93110
johndutton@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,

John Kaplan
Wildomar, CA 92595
drjohnsaddress@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
John Kirk
Santa Barbara, CA 93109
jkirk@geartrains.com
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Sincerely,
John Lucas
Los Osos, CA 93402
johnaklucas@gmail.com
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Sincerely,
John McLaurin
Paso Robles, CA 93446
knotundn416@gmail.com
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Sincerely,

John O'Connell
El Toro, CA 92609
hrisez@yahoo.com
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Sincerely,

John Pasqua
Escondido, CA 92025
killself5150@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
John Rodrigues Rodrigues
Lakeside, CA 92040
johnnyflame55@att.net
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Sincerely,
John Satchell
San Miguel, CA 93451
satchelljohn29@gmail.com
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Sincerely,

John Teevan
Chula Vista, CA 91914
jptraguer@gmail.com
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Sincerely,
John Varga
Huntington Beach, CA 92648
jlvarga9@gmail.com
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Huntington Beach, CA 92648
jvarga@occ.cccd.edu
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Sincerely,
John Warner
Goleta, CA 93117
jw@sbnatives.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
John Wills
Indio, CA 92203
cyrus12345@hotmail.com
Dear Planner Reuben Arceo,

Halt this plan until protections are in place for the at risk species in this area.

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Jon Berges
San Clemente, CA 92673
jonb@sonance.com
Dear Planner Reuben Arceo,

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Sincerely,
Jonel Pendleton
Oceanside, CA 92056
jkpend@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Joni Pradetto
San Marcos, CA 92069
beachykeenrentals@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Jose Gomez
Moreno Valley, CA 92557
josemikegomez@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Jose Luis Sanchez Gil
Hacienda Heights, CA 91745
joselsgil@yahoo.com
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Sincerely,
Joseph Boone
San Luis Obispo, CA 93401
jboone@calpoly.edu
Graham Stephens

From: jhshulman1@everyactioncustom.com on behalf of Joseph Shulman <jhshulman1@everyactioncustom.com>
Sent: Friday, August 24, 2018 1:35 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Joseph Shulman
San Diego, CA 92115
jhshulman1@cox.net
Dear Planner Reuben Arceo,

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Sincerely,

Josephine Black
Carpinteria, CA 93013
jblack@ilrc-trico.org
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Sincerely,
Josh Kaye-Carr
Ventura, CA 93001
care2@applexpert.com
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Sincerely,
Jossy Zamora
Rialto, CA 92376
archangel157@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Joy Fedele
Ojai, CA 93023
joyfedele@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Joy Pratt
Somis, CA 93066
somispratt@gmail.com
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Sincerely,
Joyce And Van Pewthers
Placentia, CA 92870
vjpewthers@att.net
Dear Planner Reuben Arceo,

As a long time supporter of the San Bernardino National wildlands, I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Joyce Burk
Redlands, CA 92373
joyceburk@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Joyce Frye
La Quinta, CA 92253
joycefkenw@outlook.com
Dear Planner Reuben Arceo,

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Sincerely,
Juan And Maria Balboa
San Jacinto, CA 92583
mjb1013@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Judith Philpot
Huntington Beach, CA 92648
jakphilpot@juno.com
Dear Planner Reuben Arceo,

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Sincerely,
Judith Spiegel
Sherman Oaks, CA 91403
judspiegel@roadrunner.com
Dear Planner Reuben Arceo,

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Sincerely,

Judy Alexandre
Ventura, CA 93004
judyalexandre@gmail.com
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Sincerely,
Judy Fukunaga
Arroyo Grande, CA 93421
judysfinag@aol.com
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Sincerely,
Judy Sweatland
San Juan Capistrano, CA 92675
judsweatland@gmail.com
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Sincerely,
Judy Williams
Caliente, CA 93518
twinoaks1@wildblue.net
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Sincerely,
Julie Molthop
Los Angeles, CA 90017
juliemolthop@gmail.com
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Sincerely,

Julie Smith
Los Osos, CA 93402
raynju1048@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Julie Vazquez-Souza
San Diego, CA 92116
jasouza9@hotmail.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

Julien Jegou
Irvine, CA 92618
jjegou@yahoo.fr
From: sunnycanuck77@everyactioncustom.com on behalf of June Sharp <sunnycanuck77@everyactioncustom.com>
Sent: Friday, August 24, 2018 6:47 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
June Sharp
Bakersfield, CA 93313
sunnycanuck77@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
June Yamada
Westminster, CA 92683
june.yamada1@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Justin Chernow
Paso Robles, CA 93446
jchernow2@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Justin Snyder
Escondido, CA 92027
justinsnyder19@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Justine Shelton
Carlsbad, CA 92010
justinemshelton@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Kaelan Shannon
Corona, CA 92882
kaelan@laughingsoul.net
From: kaiewert@everyactioncustom.com on behalf of Kai Ewert
<kaiewert@everyactioncustom.com>
Sent: Saturday, August 25, 2018 11:08 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Kai Ewert
Oak View, CA 93022
kaiewert@gmail.com
Dear Planner Reuben Arceo,

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I don't live in San Bernardino County, but I live in Riverside County and often hike and bike in the San Bernardino Mountains. This is my play area. I am AGAINST letting Omya expand their mining operations! Please do NOT allow this.

Sincerely,
Kandi DeCarlo
Riverside, CA 92506
decarloville@sbcglobal.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Kare M.
Beverly Hills, CA 90210
kmussette@me.com
Dear Planner Reuben Arceo,

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Sincerely,
Karen Bachman
Newbury Park, CA 91320
karenbachman@yahoo.com
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Sincerely,
Karen Bowden
Escondido, CA 92027
kbowden@ucsd.edu
Dear Planner Reuben Arceo,

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Sincerely,
Karen McChrystal
Santa Monica, CA 90403
mcchrystal6.0@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Karen Moffitt
San Diego, CA 92110
kmoff@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Karen Olson
Simi Valley, CA 93063
kolson@aveox.com
Dear Planner Reuben Arceo,

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Sincerely,
Karen Pendroff
Los Angeles, CA 90048
kare1212@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Karen Toyohara
La Mesa, CA 91941
spboersma@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Karina Walsh
San Diego, CA 92126
cinerina@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Karl Steinberg
Newport Beach, CA 92663
ksteinberg1@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Karla Frandson
San Diego, CA 92128
karla.frandson@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Katherine Johnson
Santa Barbara, CA 93110
katherinejohnson1@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Katherine Warner
Ventura, CA 93003
Pkrudester@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Kathie Rosvall
Vista, CA 92084
krosvall@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Kathleen Dwyer
San Marcos, CA 92069
califgal76@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Kathleen Ervin
San Diego, CA 92117
sdkathleen@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Kathleen Fox
Grover Beach, CA 93433
budunion4tuber@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Kathleen Head
Murrieta, CA 92562
kathihead@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Kathleen Herring
La Quinta, CA 92253
kathleen.herring@icloud.com
Dear Planner Reuben Arceo,

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Sincerely,
Kathleen Kuczynski
Lake Forest, CA 92630
katski47@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Kathleen Sullivan
Camarillo, CA 93010
sullivankathleen@mac.com
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Sincerely,
Kathleen Tyson
Riverside, CA 92501
tyson_kathleen@yahoo.com
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Sincerely,
Kathleen Van Every
Atascadero, CA 93422
bupkat@charter.net
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bupkat@charter.net
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Sincerely,
Kathlene Henry-Gorman
Cambria, CA 93428
khenrygo@calpoly.edu
Dear Planner Reuben Arceo,

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Sincerely,
Kathryn Frederick
Temecula, CA 92591
makeafriendfirst@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Kathryn Hanson
Huntington Beach, CA 92649
kayakinkathy@yahoo.com
Dear Planner Reuben Arceo,

Keeping in mind your earliest purpose in joining the US Forest Service, you should deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains. This project is sorely lacking a backbone.

We don’t have enough forest left after the fires and habitat encroachment to play with Nature.

Sincerely,
Kathryn Wild
San Diego, CA 92126
kathrynwildphd@gmail.com
Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Kathy Govreau
Morongo Valley, CA 92256
rambozhouse@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Kathy Hopkins
San Bernadino, CA 92404
khopbusy@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

Kathy Kosinski
Goleta, CA 93117
Kmmk@cox.net
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Sincerely,
Kathy Pinkstaff
Glendora, CA 91741
kathymq@hotmail.com
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Sincerely,
Katie Fagan
Oak View, CA 93022
katie.fagan@roadrunner.com
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Sincerely,
Katie Keefe
Grover Beach, CA 93433
katiekeefe@charter.net
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Sincerely,
Katrina Christopher
Rancho Palos Verdes, CA 90275
wildbatkat2@gmail.com
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Sincerely,
Kayla Petrovic
Escondido, CA 92029
pinkdaisy715@yahoo.com
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Sincerely,
Kazuko Mitose
San Diego, CA 92124
tiellady@san.rr.com
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Sincerely,
Keefe Nghe
Ventura, CA 93004
knghe77@gmail.com
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Sincerely,
Kelly Brannigan
Oceanside, CA 92056
kelly.brannigan@cdfa.ca.gov
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Sincerely,
Kelly Miller
San Diego, CA 92128
Peeweefan78@hotmail.com
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Sincerely,
Kelly Reed Daulton
Templeton, CA 93465
daultonreed@sbcglobal.net
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Sincerely,
Ken Gilliland
Tujunga, CA 91042
empken@empken.com
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Sincerely,
Ken Meersand
Pismo Beach, CA 93448
kenmeer@yahoo.com
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Sincerely,
Ken Sanford
Escondido, CA 92029
kenssailtime@gmail.com
Good Morning Mr. Maetzold,

Congratulations with your new calling. I am available on Tuesday - August 7th

Mr. Kenline and Mr. Arceo: My name is Craig Maetzold and I have recently been hired as the Regional Environmental Affairs Manager for Omya. This is the position that was previously held by Shelby Olson. The purpose of this message is to request an introductory meeting at the San Bernardino County offices. During the meeting, I intend to discuss permit, SMARA, and other pertinent regulatory items that involve the county. Following are a few possible dates for the meeting:

Tuesday, July 31: anytime in the morning
Thursday, August 2: Early afternoon between 12:30 pm and 2:30 pm (I have a meeting with Aspen Environmental at 3:00 pm in Upland, CA)
Tuesday, August 7: Early afternoon between 12:30 pm and 2:30 pm

Let me know if any of the schedule options above are acceptable. I will send some specific discussion topics once the schedule is finalized. Contact me with any questions. Thank you.

Best Regards

Craig Maetzold
Environmental Affairs Manager
"This message contains information that may be confidential or privileged and is intended only for the individual or entity named above. No one else may disclose, copy, distribute or use the contents of this message. Unauthorized use, dissemination and duplication is strictly prohibited, and may be unlawful. All personal messages express views solely of the sender, which are not to be attributed to Omya AG and its subsidiaries and affiliates. If you received this message in error, please notify the Sender and delete this message."
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

The draft documents also downplay the impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging. Mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors.

Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Kenneth Wagovich
Cathedral City, CA 92234
emlofcat@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Kevin Curtis
Fullerton, CA 92832
houseofcurtis@netscape.net
Dear Planner Reuben Arceo,

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Sincerely,
Kevin Fistanic
Los Angeles, CA 90066
kevinfistanic@gmail.com
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Sincerely,
Kevin W. McAlister
Bellmore, NY 11710
kevinwmcal@hotmail.com
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Sincerely,
Kim Floyd
Palm Desert, CA 92260
kimfloyd@fastmail.com
Dear Planner Reuben Arceo,

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Kim Floyd
Palm Desert, CA 92260
kimffloyd@fastmail.com
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Sincerely,
Kim Glann
Los Angeles, CA 90032
kimglann@me.com
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Sincerely,
Kim Nero
Costa Mesa, CA 92627
kimonic@knac.com
Dear Planner Reuben Arceo,

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Sincerely,
Kim Tran
Santa Ana, CA 92707
kmt02@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Kimberly Agosti
Rancho Cucamonga, CA 91730
harpgoddesskim@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,

Kimberly Kieffe
Carlsbad, CA 92008
kimkieffe@yahoo.com
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Sincerely,
Kimberly Sickel
Cypress, CA 90630
mackimmy@me.com
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Sincerely,
Kimberly Skuster
San Diego, CA 92128
kskuster@yahoo.com
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Sincerely,
Kimberly Wiley
Rochester, NY 14612
kwiley16@hotmail.com
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Sincerely,
Klaus Tritschler
Ventura, CA 93003
klaust066@gmail.com
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Sincerely,
Kortney Lillestrand
Laguna Beach, CA 92651
kk.lillestrand@gmail.com
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Sincerely,
Kris Cordova
Loma Linda, CA 92354
kriscordova@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,

Kris Head
Garden Grove, CA 92843
lwzahed@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Kristen Ohmstedee
Los Angeles, CA 90068
kristin.ohmstedee@gmail.com
Dear Planner Reuben Arceo,

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Los Angeles, CA 90068
kristin.ohmstede@gmail.com
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Sincerely,
Kristin Laughtin-Dunker
Santa Ana, CA 92706
klaughtin@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Kristin Young
Buena Park, CA 90620
kristinduffy@earthlink.net
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Sincerely,
Kristin Young
San Diego, CA 92107
kristinng86@gmail.com
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Sincerely,
Kurt Broz
Temecula, CA 92591
kurtbroz@yahoo.com
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Sincerely,
Kurt Speidel
San Clemente, CA 92673
Kswhatever@cox.net
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Kyler Barnes
Huntington Beach, CA 92646
kjblove@gmail.com
Dear Planner Reuben Arceo,

Trust the science. Trust the past record of rising numbers in populations that were at risk. Trust that you are the only thing standing in the way of new policies or practices that can reverse species recovery, and that you are our only hope to keep this all this progress from going into oblivion.

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

Sincerely,

L Cadman
San Diego, CA 92119
haggymama_wolfie@sbcglobal.net
Dear Planner Reuben Arceo,

Trust that you were right, in the first place, to put the limits of land use around the Wilderness areas into law. Any company that wishes to overstep those limits is not in the right. Not scientifically, and certainly not morally. I was there and I fought for them, too.

Trust the science that saved one of the last great wildernesses in the United States. Trust that the wisest decisions were made for the wilderness areas and that they were not only wise but visionary. And time has proven you right. Now those decisions are being challenged but should not be abandoned.

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Sincerely,
L. Adams
Escondido, CA 92026
lzdldy@att.net
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Sincerely,
Lacey Levitt
San Diego, CA 92120
laceylevitt@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Lance Jordan
San Diego, CA 92110
lanceg47@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Laura Bloom
Altadena, CA 91001
LAURALI332244@YAHOO.COM
Dear Planner Reuben Arceo,

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Sincerely,
Laura Comstock
Thousand Oaks, CA 91362
pmci.laura@gmail.com
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Sincerely,
Laura Craun
Bakersfield, CA 93311
laura@wetreatyourfeet.com
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Sincerely,
Laura Freeman
Irvine, CA 92604
laurafree22@gmail.com
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Sincerely,
Laura Horton
Santa Ana, CA 92705
starlitangel61@gmail.com
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Sincerely,
Laura Mendoza
Palm Springs, CA 92262
artista_la@yahoo.com
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Laura Newton
Cathedral City, CA 92234
mrsnewt@dc.rr.com
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mrsnewt@dc.rr.com
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Sincerely,
Laurel Scott
San Diego, CA 92108
laurel_scott@msn.com
Dear Planner Reuben Arceo,

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Sincerely,
Laurie Sterling Jensen
La Jolla, CA 92037
lauriesterlingjensen@gmail.com
Dear Planner Reuben Arceo,

I am reaching out to ask you to reject the proposed expansion of the Omya mine. The current plan provides no transparency as it relates to protections for golden eagles, bighorn sheep, etc. These small and pressured populations cannot afford to suffer further disruption to their habitats and should be protected. If there are no plans for mitigating the expansion, which I doubt is even possible, the proposal should be rejected.

As a member of the public, native of San Bernardino County and frequent visitor to the area, I have to trust the folks in charge to manage the forest for the benefit of all. That includes the so called tree huggers like myself. The Inland Empire has seen tremendous growth and business development over the past 20 years which has left little in the way of wild lands. The San Bernardino National Forest is under enough pressure already. Please take its overall health into account when considering this project and reject it on behalf of those who want to protect for generations to come.

Thank you.

Sincerely,

Lea Park
Rancho Santa Fe, CA 92067
lclaypark@edge-re.com
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Sincerely,
Leah Perales
Wildomar, CA 92595
mymocha12@yahoo.com
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Leanne Yerby
Irvine, CA 92614
lyerby@allenmatkins.com
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Sincerely,
Leigh Dayton
Murrieta, CA 92563
leighdayton@iinet.net.au
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Sincerely,
Lena Nilsson
Laguna Beach, CA 92651
lnilsson1@yahoo.com
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Sincerely,
Lenore Reeves
Mokena, IL 60448
lerves@gmail.com
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Sincerely,
Lesley Terwilliger
Ventura, CA 93001
Lellyt@me.com
Dear Planner Reuben Arceo,

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Sincerely,
leslie spoon
Los Osos, CA 93402
tikibirdgreen@yahoo.com
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Sincerely,

Leslie Tate
National City, CA 91950
ltate@sdcdd.edu
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Sincerely,
Lewis Crusha
El Cajon, CA 92019
holisticgardener@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Lewis Crusha
El Cajon, CA 92019
holisticgardener@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Lezlie Navarro
Wildomar, CA 92595
lezlienavarro1995@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Ligia Arce
Torrance, CA 90503
arcepanda@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Lila Taylor
Ventura, CA 93001
lstyle@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Lily Mejia
Hemet, CA 92543
lily29@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Linda Allen
Buffalo, NY 14226
catsanddolls@yahoo.com
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Sincerely,

Linda Aurora Espino
San Diego, CA 92101
mslaespino@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Linda Brophy
Santa Barbara, CA 93105
lbrophy26@gmail.com
From: ladypadre@everyactioncustom.com on behalf of Linda Davidson
<ladypadre@everyactioncustom.com>
Sent: Saturday, August 25, 2018 1:21 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Linda Davidson
Lakeside, CA 92040
ladypadre@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Linda Degroodt
Huntington Beach, CA 92647
clindadeg@verizon.net
Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Linda Dubnick
Big Bear City, CA 92314
lindadubnick@icloud.com
Dear Planner Reuben Arceo,

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Sincerely,
Linda Hillman
Camarillo, CA 93012
lghillman@earthlink.net
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained, and if not, no expansion.

Sincerely,
Linda Howe
Belmont, MA 02478
lhowe@verizon.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Linda Jones
Cornville, AZ 86325
catslady3@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Linda Kourtis
San Diego, CA 92117
Lbkour@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Linda Ridenour
Lake Elsinore, CA 92530
geneandlinda@hotmail.com
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Sincerely,
Linda Shadle
Anaheim, CA 92804
medicinewolf86@hotmail.com
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Sincerely,
Linda Spanski
Oceanside, CA 92054
hgfd9876@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Linda Stewart
Chino Hills, CA 91709
7lindastewart@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Linda Susie Vanderlip
Orange, CA 92869
svanderlip@aol.com
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Sincerely,

Linda Whetstine
Poway, CA 92064
lwhelstti@aol.com
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Sincerely,
Lindsay Luke
Tustin, CA 92782
LLuke714@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Lisa Dahill
Thousand Oaks, CA 91360
Idahill@gmail.com
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Sincerely,
Lisa Eddy
Orange, CA 92869
lsaed1003@yahoo.com
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Lisa Eddy
Orange, CA 92869
Isaed1003@yahoo.com
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Sincerely,
Lisa Gray
Anaheim, CA 92806
lisaegray@hotmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Lisa Hill Baertschi
Ojai, CA 93023
one.native.root@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Lisa Mazzola
Tampa, FL 33612
lmazzola@tampabay.rr.com
Dear Planner Reuben Arceo,

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Sincerely,
Lisa McCown
Rancho Cucamonga, CA 91701
Ilmccown@mac.com
Dear Planner Reuben Arceo,

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Sincerely,
Lisa Neste
High Point, NC 27265
lilmouse1213@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Lisa Rembold
Canoga Park, CA 91303
lrembold@socal.rr.com
Graham Stephens

From: lisarosenfield@everyactioncustom.com on behalf of Lisa Rosenfield
Sent: Friday, August 24, 2018 6:11 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Lisa Rosenfield
Van Nuys, CA 91401
lisarosenfield@icloud.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Lisa Toliver
Carlsbad, CA 92009
lisareps@me.com
From: brinkstock@everyactioncustom.com on behalf of Lisabette Brinkman
<brinkstock@everyactioncustom.com>  
Sent: Friday, August 24, 2018 10:31 AM  
To: Arceo, Reuben  
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Lisabette Brinkman
Santa Barbara, CA 93101
brinkstock@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

lloyd reynolds
Fountain Valley, CA 92708
lareyn@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Lois Emmajane Newman Shubert
Camarillo, CA 93010
loisdar1776@roadrunner.com
Dear Planner Reuben Arceo,

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Sincerely,
Lone Fundby
00000
lonefundby@gmail.com
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Sincerely,
Lorena Cox
Irvine, CA 92612
Lorenacox@me.com
Dear Planner Reuben Arceo,

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Sincerely,

Lori Bates
Oxnard, CA 93035
vivaaloha@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Lori West
Coronado, CA 92118
lorisampa@icloud.com
Dear Planner Reuben Arceo,

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Sincerely,

Louise Priest
Santa Paula, CA 93060
bazwez@aol.com
Dear Planner Reuben Arceo,

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Sincerely,

Louise Zimmer
Temecula, CA 92592
louise.rqtex@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Luann Tauchman
Running Springs, CA 92382
luann.tauchman@gmail.com
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Sincerely,
Luce Gauthier
Los Angeles, CA 90016
lgauthierpq@gmail.com
Dear Planner Reuben Arceo,

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I am saddened by the changes that have already come from climate change, and want YOU to know that US citizens want your help in maintaining places, plants, and critters for future Americans!

Sincerely,
Lucy Clark
Bakersfield, CA 93308
lucyg391@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Luis Fuentes
Palm Springs, CA 92262
luisgfuentes10@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Luis Fuentes
Palm Springs, CA 92262
luisgfuentes10@gmail.com
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Sincerely,
Luis Rios
Tustin, CA 92782
flytxprt@msn.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Lynn Krikorian
San Pedro, CA 90732
L.Krikorian12@gmail.com
 Dear Planner Reuben Arceo,

I'm writing you to urgently request that you deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains. This project must be sent back to the drawing board because of several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

Additionally, it's wholly unacceptable that the draft documents downplay the impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging. Mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors.

Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Lynne Harkins
Cambria, CA 93428
4lmh2email@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
M Robert Wilkerson
Pomona, CA 91768
power.source@outlook.com
Dear Planner Reuben Arceo,

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Sincerely,
Maisy Lewis
Ojai, CA 93023
lewisx5@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Mala Wingerd
San Diego, CA 92119
wingerdmala@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Mallory Sherbrook
Palm Springs, CA 92262
msherbrook@sblake.com
Dear Planner Reuben Arceo,

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Sincerely,

Mandy Barre
Oceanside, CA 92054
mandybear44@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Marc Couacaud
San Luis Obispo, CA 93401
mcouacaud@charter.net
Dear Planner Reuben Arceo,

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Sincerely,
Marc Grawunder
49492
strangerdays@hotmail.de
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Sincerely,
Marc Orfanos
Thousand Oaks, CA 91360
marcorfanos@mac.com
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Sincerely,
Marcia C. Hackett
Laguna Woods, CA 92637
mchackett4464@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Marcia Sherman
Santa Barbara, CA 93110
mcsherman@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Marcina Motter
Encinitas, CA 92024
sunimae@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Margaret White
Laguna Beach, CA 92651
margaretwhite470@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Margaret Wilson
Ventura, CA 93003
mwilson2plus2@roadrunner.com
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I'm with the Center for Biological Diversity. This nation is not only for your purposes & for you to use. YOU need to follow procedure, the laws & respect for others. There are others who live in this cite you want to mine & animals do matter; they like we need homes to raise theirs. Besides, like we, they are part of many linked eco-systems that make this planet spin. Thank you.

Sincerely,

margarita clayton
Santa Ana, CA 92705
claytonfm@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Marge Almond
Riverside, CA 92506
margaret.almond@cbre.com
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Sincerely,
Margot Lowe
Oceanside, CA 92056
margotlowe1@gmail.com
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Sincerely,
Maria Sauceda
El Monte, CA 91731
Ma.coco78@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Marie Wakefield
Newport, OR 97365
wakefieldm_2000@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Marilyn Hempel
Yucaipa, CA 92399
mshempel@me.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that would make you regret okay-ing it when its dark side ruins our ecology. I know you don' want that to happen on your watch.

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Sincerely,
Marilyn Stachtenfeld
Aliso Viejo, CA 92656
mstachenfel@saddleback.edu
Dear Planner Reuben Arceo,

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Sincerely,

Marisa Lapoint
Irvine, CA 92612
marisalpt@gmail.com
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Sincerely,
Marissa Tinsley
Lemon Grove, CA 91945
picobamba@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Mark Medina
Rancho Cucamonga, CA 91737
Mark-medina@live.com
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Sincerely,
Mark Ogonowski
Ventura, CA 93003
mogo666@gmail.com
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Sincerely,
Marla Feierabend
Santa Barbara, CA 93109
mfeierabend@seedmackall.com
Dear Planner Reuben Arceo,

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Sincerely,

Marlayna Hadley
Inyokern, CA 93527
marlaynahadley@yahoo.com
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Sincerely,
Marlene Tucay
Anaheim, CA 92805
marloraine2006@yahoo.com
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Sincerely,

Martha Aubin
Santa Barbara, CA 93109
aubinms@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

The draft documents also downplay the impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging. Mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors.

Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Martha Nuno
Canoga Park, CA 91304
martha262@hotmail.com
Dear Planner Reuben Arceo,

I urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains. Please send this project back to the drawing board to rectify key problems with the current plan.

Right off the bat, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fails to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. But worse, the documents also fail to include the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County require in current land-use plans.

Please be aware that the draft documents downplay the impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging.

Promising to write management plans for the bighorn and raptors sometime in the future misses the point! Plans are needed first in order to safeguard critically imperiled animals. As you must realize, mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors. How will these wildlife populations will be sustained?

Sincerely,
Martin Hanzlik
Seal Beach, CA 90740
Tranquilspirits@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Martin Marcus
San Diego, CA 92120
abba_eama@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

Marvin Karno
Encino, CA 91316
amkarno@aol.com
Dear Planner Reuben Arceo,

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Sincerely,

Marvin Sperlin
Ventura, CA 93001
Marv@sperlin.com
Dear Planner Reuben Arceo,

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Sincerely,

Mary Ann Brussat
Claremont, CA 91711
brussat@spiritualityandpractice.com
Dear Planner Reuben Arceo,

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Sincerely,

mary ann ruiz
Chino, CA 91710
ruizmaryann@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Mary Brooks
Frazier Park, CA 93225
mbrooks2521@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Mary Elise Harris
Fallbrook, CA 92028
sirrahem@roadrunner.com
Dear Planner Reuben Arceo,

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Sincerely,
Mary Harding
San Diego, CA 92116
smokietigerman@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Mary Kottman
Temecula, CA 92592
mekottman68@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Mary Leck
Cambria, CA 93428
maryleck3d@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Mary M Shanley
Escondido, CA 92029
Mmshanley85@gmail.com
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Sincerely,
Mary M. Mason
Huntington Beach, CA 92649
mickey3ms42net@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Mary Nicholas
Santa Ana, CA 92705
MLNikolac52@gmail.com
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Sincerely,
Mary Palacios
San Bernardino, CA 92410
marylena58@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Mary Steele
Laguna Niguel, CA 92677
online-activist@alumni.stanford.edu
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Sincerely,
Mary Wiener
Carpinteria, CA 93013
mbw565@gmail.com
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Sincerely,
Mary Wood
San Luis Obispo, CA 93401
mjkw31@gmail.com
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Sincerely,
Maryann Haller
Escondido, CA 92025
iluvacat@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Marylou Thomas
Long Beach, CA 90815
steffy@mlthomas.com
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Sincerely,

MaryLynn Michaelis
Columbia Station, OH 44028
n8dmm@roadrunner.com
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Sincerely,
Matilde Navarro
Garden Grove, CA 92841
mdnavarro@sbcglobal.net
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Sincerely,
Matt Solomon
Escondido, CA 92027
matt@remotecontrolmonkey.tv
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Sincerely,
Matthew Davis
San Diego, CA 92131
Mdavis450@gmail.com
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Sincerely,
Matthew Meier
San Diego, CA 92117
meiermatthew@hotmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Matthew Page
Ventura, CA 93001
southern.pacific.9735@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Maura Sheehan
Encinitas, CA 92024
freedom71@protonmail.com
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Sincerely,
Maureen Toth
Studio City, CA 91604
maureen@eastertalent.net
Are you able to join the call?

Maya Rohr  
Sespe Consulting, Inc.  
1565 Hotel Circle South, Ste 370  
San Diego, CA 92108  
W 619.894.8669  
C  619.508.7889  
mrohr@sespeconsulting.com

-----Original Message-----
From: Arceo, Reuben [mailto:Reuben.Arceo@lus.sbcounty.gov]  
Sent: Thursday, August 23, 2018 1:10 PM  
To: Maya Rohr  
Cc: Kenline, George  
Subject: FW: No Omya Mine Expansion

Hello Maya please note the opposition email below to the butterfield project.

Please take a moment to complete our 1 Minute Satisfaction Survey  https://www.surveymonkey.com/r/LUS_Email

Reuben Arceo  
Planner  
Land Use Services Department  
Phone: 909-387-4387  
Fax: 909-387-3223  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

Our job is to create a county in which those who reside and invest can prosper and achieve well-being.  
www.SBCounty.gov

County of San Bernardino Confidentiality Notice: This communication contains confidential information sent solely for the use of the intended recipient. If you are not the intended recipient of this communication, you are not authorized to use it in any manner, except to immediately destroy it and notify the sender.

-----Original Message-----
From: cybeleknowles@everyactioncustom.com <cybeleknowles@everyactioncustom.com>  
Sent: Thursday, August 23, 2018 1:07 PM  
To: Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>  
Subject: No Omya Mine Expansion
Dear Planner Reuben Arceo,

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Sincerely,
Cybele Knowles
Tucson, AZ 85716
cybeleknowles@gmail.com
Subject: Omya Public Comments
Location: 805.804.5862 pw 1234
Start: Tue 8/28/2018 2:30 PM
End: Tue 8/28/2018 3:00 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Maya Rohr

When: Tuesday, August 28, 2018 2:30 PM-3:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: 805.804.5862 pw 1234
Note: The GMT offset above does not reflect daylight saving time adjustments.
*~*~*~*~*~*~*~*~*~*
Call in #: 805.804.5862 pw 1234
Hi all – I just pulled out the 1,107 emails (into separate folder) that I got over the weekend from the CBD folks and have been able to start looking at my work emails. (The emails are still coming) I did not see any response regarding setting up a conf call tomorrow at 2:0 ish except from Scott. I may have missed some that got lost in the email blast or my email is also crashing several times a days. Hopefully they will end by the end of today. So point is – does 2:00r or 2:30 work for Reuben, Tasha, Jody or whoever would like to join the call to discuss next steps to final the EIR/EIS??

Thanks

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com
This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
Hi all

I would like to set up a call for early next week to discuss the comments we have received. Other than the email blast from CBD we have one letter in support and one from the AQMD that essentially states that the Project must comply with AQ regulations – which it will. Craig is available Tuesday around 2:30. If that does not work for you please let me know what days/times would be better. When you respond to this email please identify your email as urgent so that I will notice it among the hundreds of emails coming in via the email blast.

Thanks

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com
Graham Stephens

From: Maya Rohr <mrohr@sespeconsulting.com>
Sent: Friday, August 24, 2018 10:23 AM
To: Noiron, Jody -FS; Eliason, Scott -FS; Arceo, Reuben
Cc: John Hecht
Subject: RE: Omya email blitz

Jody – actually the emails have not stopped coming in to me either. Apparently they just got backed up or something – still getting several every minute or so.

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com

From: Noiron, Jody -FS [mailto:jnoiron@fs.fed.us]
Sent: Friday, August 24, 2018 9:35 AM
To: Eliason, Scott -FS; Maya Rohr; Arceo, Reuben
Subject: RE: Omya email blitz

They stopped 😊 you worked magic!! thx

Jody Noiron
Forest Supervisor
Forest Service
San Bernardino National Forest
p: 909-382-2710
c: 626-590-7628
t: 909-383-5504
jnoiron@fs.fed.us
602 S. Tippecanoe Avenue
San Bernardino, CA 92408
www.fs.fed.us
Caring for the land and serving people

From: Eliason, Scott -FS
Sent: Friday, August 24, 2018 9:01 AM
To: Noiron, Jody -FS <jnoiron@fs.fed.us>; Maya Rohr (mrohr@sespeconsulting.com) <mrohr@sespeconsulting.com>; Arceo, Reuben <Reuben.Arceo@lus.sbcounty.gov>
Subject: Omya email blitz

I wanted to let you know that I reached Lisa Belenky at CBD and requested that they stop the form letters currently blowing up your inboxes and compile them on a disk to send to me. Hopefully that will happen very soon. Scott
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Jody – I was just talking to Reuben and his have not stopped – as we were talking they were still coming in. He said he is received over 500 and still coming. Can you guys try and get them to stop sending them to the County also.

Thanks

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com

They stopped 😊 you worked magic!! thx

Jody Noiron
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Hi All

Here is our third formal comment letter (it was also sent directly to Scott and Reuben). Interesting that it is from Arizona.

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com

-----Original Message-----
From: cybeleknowles@everyactioncustom.com [mailto:cybeleknowles@everyactioncustom.com]
Sent: Thursday, August 23, 2018 1:07 PM
To: Maya Rohr
Subject: No Omya Mine Expansion

Dear Project Manager Maya Rohr,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Cybele Knowles
Tucson, AZ 85716
Hi All – Please see the following email supporting the project.

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C  619.508.7889
mrohr@sespeconsulting.com

From: Chuck Bell [mailto:chuckb@sisp.net]
Sent: Monday, August 20, 2018 8:55 PM
To: Maya Rohr
Cc: craig.maetzold@omya.com
Subject: Omya Quarry Expansions

To: Maya Rohr – Sespe Consulting

From: Chuck Bell, Pres. Lucerne Valley Economic Development Assoc. (LVEDA) 760 964 3118  chuckb@sisp.net
P. O. Box 193
Lucerne Valley, CA 92356

Date: 8/20/18

RE: OMYA CALIFORNIA - BUTTERFIELD SENTINEL QUARRY EXPANSION PROJECT

Omya representatives presented this project at our 8/7/18 LVEDA meeting. We support and greatly appreciate the limestone producers in our community – critical to our economy. The subject quarries are not visible from the valley. The on-going restoration activities for past and current quarries will mitigate the impacts to the maximum extent possible – especially re: limestone endemics and wildlife (especially big horn sheep).

LVEDA supports the project with the restoration requirements.

(Please acknowledge receipt and let me know if you need a signed copy).
Chuck Bell
Hi All

We just got our first comment letter on the Draft EIR/EIS for Butterfield Sentinel. It is from the Mojave Desert AQMD and does not present any significant issues. They have requested a few additional mitigations for dust which are primarily complying with their existing regulations (we have already said we would comply with all applicable regulations). I asked Scott Cohen to prepare a response and I will forward that once he has a draft.

Has anyone else received any comments?? Since my name is on the NOA they should only come to me but you never know.

Thank you.

Maya Rohr
Sespe Consulting, Inc.
1565 Hotel Circle South, Ste 370
San Diego, CA 92108
W 619.894.8669
C 619.508.7889
mrohr@sespeconsulting.com
Dear Planner Reuben Arceo,

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Sincerely,
Megan Flaherty
San Diego, CA 92104
flaherm@tcd.ie
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Sincerely,
Mel Green
00505
reptmmpp@yahoo.es
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Sincerely,
MELANIE VOLLBRECHT
Moorpark, CA 93021
dispatch@axicom.net
Dear Planner Reuben Arceo,

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Sincerely,
Melissa Davis
Paso Robles, CA 93446
melissadavis_2000@yahoo.com
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Sincerely,
Melissa Partida
Gardena, CA 90248
mpartida97@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Melissa Vasconcellos
Ventura, CA 93006
Melissajv1967@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Melody Grigg
Santa Maria, CA 93455
melody.muzette@gmail.com
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Sincerely,
Mercedes Benet
Carlsbad, CA 92009
benetmercedes@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael A. Johnston
San Diego, CA 92116
Pluto_Of_The_Underworld@HauntedMansion.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Bouvet
San Diego, CA 92106
m2bouvet@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Callaway
Upland, CA 91786
Mikeinupland@hotmail.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Michael Chormicle
Cathedral City, CA 92234
Michaelchormicle@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Curtis
San Diego, CA 92101
mcurtis71@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Dearth
Palm Springs, CA 92264
mldearth@aol.com
Dear Planner Reuben Arceo,

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Sincerely,

Michael Esten
San Diego, CA 92116
michael.esten@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Frey
Santa Barbara, CA 93108
mjf@dslextreme.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Goode
Marina Del Rey, CA 90295
info@trumpetworkspress.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Hatcher
Buena Park, CA 90621
phatcher7@roadrunner.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Henderson
Huntington Beach, CA 92649
michaelhenderson@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Hogan
Del Mar, CA 92014
mghogan82@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Michael Madrigal
San Jacinto, CA 92583
kwinyil@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Michael McLane
Sugarloaf, CA 92386
mtnman.michael@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Michael McMahan
Huntington Beach, CA 92649
mcmahan44@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Michael McMahan
Huntington Beach, CA 92649
mcmahan44@yahoo.com
Dear Planner Reuben Arceo,

I strongly urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains. There are several key elements of the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

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Sincerely,
Michael McNally
Irvine, CA 92617
mmcnally@uci.edu
Dear Planner Reuben Arceo,

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Personal: Living in Southern California, I am so saddened by our loss of wildlife and habitat compared to other parts of the country. Please don't make it worse! I would like to leave something for my children and family.

Sincerely,
Michael Qualls
La Mesa, CA 91941
mqualls01@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Michael Rotcher
Mission Viejo, CA 92692
michaelrotcher@hotmail.com
Dear Planner Reuben Arceo,

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We cannot let San Bernardino county sink to the low of giving our mountains & precious birds & animals that had become the norm in the United States of America. Let us stand out as a beacon of caring & of protecting our only hope for survival Mother Earth in her natural state.

Sincerely,
Michal Mitchell
Ojai, CA 93023
michalmitchell@earthlink.net
I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Michele Stewart
San Diego, CA 92128
MSTEWART77@TWC.COM
Graham Stephens

From: michele@everyactioncustom.com on behalf of Michele Taylor
< michele@everyactioncustom.com >
Sent: Friday, August 24, 2018 9:57 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Michele Taylor
Oceanside, CA 92054
michele@virsitil.com
Dear Planner Reuben Arceo,

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Sincerely,
Michelle Homer
Beverly Hills, CA 90210
michellehomer80@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Michelle Kosinski
Goleta, CA 93117
moach831@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Michelle Palladine
Palm Springs, CA 92262
mpalladine@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Michelle Sparks-Gillis
Solvang, CA 93463
mleesp@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Michelle Taylor
Boise, ID 83725
lesmond@bigpond.net.au
Dear Planner Reuben Arceo,

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Sincerely,
Micki East
San Marcos, CA 92079
alotia1@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Miguel Rodriguez
Long Beach, CA 90806
epiphany562@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Mike Acosta
Riverside, CA 92504
ma48442@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Mike Real
Newbury Park, CA 91320
mykey1r@mac.com
Dear Planner Reuben Arceo,

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Sincerely,
Mike Robertson
Pasadena, MD 21122
mikerobertson23@outlook.com
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Sincerely,
Mike Santi
Huntington Beach, CA 92605
blueoceandiving@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Mike Scarbery
La Mesa, CA 91942
mikescarbery@icloud.com
Dear Planner Reuben Arceo,

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Sincerely,
Mikhail Vizel
Moorpark, CA 93021
ddbvizel@hotmail.com
I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Miranda Johnson
Riverside, CA 92504
lipsspeakwords@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained. ONLY GREEDY PHUCKING BOTH CORPORATIONS AND THE PHUCKING GOVERNMENT WOULD MOVE FORWARD AND PHUCK OVER CONSTITUENTS BEHIND THEIR BACKS. MAY ALL OF THEM BE DESTROYED FOR AN ETERNITY!!!!!!!!!!!

Sincerely,

Miriam Baum
Rancho Cucamonga, CA 91701
miriambaum@aol.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Miriam Neff
Dana Point, CA 92629
neff100@hotmail.com
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Sincerely,
Mirna Solorzano
Santa Ana, CA 92707
mirnasj@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Mona Harnish
San Bernardino, CA 92404
mjharnish1954@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

Monica Border
San Diego, CA 92127
mlb@dustbird.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Morrell Deborah
Buena Park, CA 90620
hummingbirdhoedown@gmail.com
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How much does it really take to follow the plan to protect the creatures who make it their home, in relation to the loss that forcing these creatures out and moving them closer to extinction may have? Shortsightedness and greed are costly to the environment and fail to think of those who come after us and how our actions may deprive them of these amazing creatures. Please think of the future, not only how your pockets can be lined with money.

Sincerely,
Muriel Witham
Laguna Woods, CA 92637
Murielwitham@Gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Myra Toth
Ojai, CA 93024
radtoth@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Myriam Frausto
Tustin, CA 92782
Mfrausto7@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

N. J. Bast
Morro Bay, CA 93442
fairviewnancyb@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Nancy Abrams
San Diego, CA 92103
abramsnandu@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Nancy Borelli
Camarillo, CA 93012
nancyborelli@gmail.com
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Sincerely,

Nancy Brian
La Mesa, CA 91941
nancyb3@cox.net
Dear Planner Reuben Arceo,

I live in these mountains and I love being able to hike and explore so many natural areas. The last thing I want to see is this natural beauty destroyed!

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Nancy Freedland
Big Bear City, CA 92314
nhamorah@verizon.net
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Sincerely,
Nancy Gould
Santa Barbara, CA 93105
Oceanviewbeach@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Nancy Heck
Santa Maria, CA 93454
nancyheck1@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Nancy Kingston
Mission Viejo, CA 92692
nxkingston@cox.net
Dear Planner Reuben Arceo,

Do the right thing.

Deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Nancy Miller
Santa Maria, CA 93455
Sistergh1976@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

NANCY Neely
Rancho Cucamonga, CA 91730
wcn.nsn@verizon.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Nancy Robinson
Ridgecrest, CA 93555
Nancyeprobinson@outlook.com
Graham Stephens

From: Classicfire@everyactioncustom.com on behalf of Nanvy Moll  
<Classicfire@everyactioncustom.com>  
Sent: Friday, August 24, 2018 6:12 AM  
To: Arceo, Reuben  
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Nanvy Moll
Hemet, CA 92544
Classicfire@protonmail.com
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Sincerely,
Natalie Smith
Indio, CA 92201
natalie8u@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Neil Brydon
San Diego, CA 92103
jeremyrfritz@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Neio Schneider
Poway, CA 92064
velorambler@gmail.com
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Sincerely,
Nichelle Virzi
Jurupa Valley, CA 92509
elegant_nichelle@yahoo.com
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Sincerely,
Nick Gaetano
Laguna Beach, CA 92651
nic1@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Nicolas Duon
Santa Ana, CA 92705
Nickie.duong@infineon.com
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Sincerely,
Nicolas Duon
San Bernardino, CA 92405
Nduong1@irf.com
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Sincerely,
Nicole McKenzie
San Marcos, CA 92078
nicole.mckenzie@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Nicole Mikals
Newbury Park, CA 91320
n_vitale@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Nicolette Ludolphi
28239
agwang@hotmail.de
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Sincerely,
Niki Fafoutis
Harbor City, CA 90710
nikizf2@gmail.com
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Sincerely,

Noel Park
Rancho Palos Verdes, CA 90275
noelparkone@gmail.com
I can be on the call from 230-3pm. Thx

---

-----Original Appointment-----

From: Maya Rohr [mailto:mrohr@sespeconsulting.com]
Sent: Monday, August 27, 2018 9:47 AM
To: Eliason, Scott -FS; Noiron, Jody -FS; Hernandez, Tasha -FS; Arceo, Reuben; Craig Maetzold
Subject: Omya Public Comments
When: Tuesday, August 28, 2018 2:30 PM-3:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: 805.804.5862 pw 1234

When: Tuesday, August 28, 2018 2:30 PM-3:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: 805.804.5862 pw 1234

Note: The GMT offset above does not reflect daylight saving time adjustments.

*~*~*~*~*~*~*~*~*~*

Call in #: 805.804.5862 pw 1234

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law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
They stopped 😊 you worked magic!! thx

Jody Noiron  
Forest Supervisor  
Forest Service  
San Bernardino National Forest  

p: 909-382-2710  
c: 626-590-7628  
f: 909-383-5504  

E-mail: jnoiron@fs.fed.us  

602 S. Tippecanoe Avenue  
San Bernardino, CA 92408  

www.fs.fed.us  

Caring for the land and serving people

---

Scott Eliason  
Botanist  
Forest Service  
San Bernardino National Forest  

Mountaintop District  

909-382-2830  
seilason@fs.fed.us  

41374 North Shore Drive, PO Box 290  
Fawnskin, CA 92333  

www.fs.usda.gov/sbnf  

Caring for the land and serving people
Thank you !!

Jody Noiron  
Forest Supervisor  
Forest Service  
San Bernardino National Forest  
p: 909-382-2710  
c: 626-590-7628  
f: 909-383-5504  
*jnoiron@fs.fed.us*  
602 S. Tippecanoe Avenue  
San Bernardino, CA 92408  
www.fs.fed.us  
Caring for the land and serving people

I wanted to let you know that I reached Lisa Belenky at CBD and requested that they stop the form letters currently blowing up your inboxes and compile them on a disk to send to me. Hopefully that will happen very soon. Scott
This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
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Sincerely,
Nora Lewis
Nipomo, CA 93444
noracnm@verizon.net
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Sincerely,
Norm Ellis
Laguna Hills, CA 92653
nellis2996@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Olivia Gaddini Gaddini
Ladera Ranch, CA 92694
ogaddini@cox.net
Dear Planner Reuben Arceo,

I urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains until its explained just how sensitive wildlife populations will be sustained.

Sincerely,
Ormand Tegland
Laguna Niguel, CA 92677
oteg@mac.com
Dear Planner Reuben Arceo,

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Sincerely,
P. Feinblatt
Pasadena, CA 91104
pepi1655@att.net
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Sincerely,
Pablo Herrero
Laguna Niguel, CA 92677
pjherrero@yahoo.com
Dear Planner Reuben Arceo,

I have read this pre-written message and endorse it 100%:

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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^^This last portion is of utmost importance. Golden eagles are our state bird and they deserve our honor.

Sincerely,
Pamela Langley
Murrieta, CA 92562
pamelala95@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Pamela McDonald
Riverside, CA 92505
plmatdhs@yahoo.com
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Sincerely,
Pamela Nelson
Warner Springs, CA 92086
pamela05n@yahoo.com
Dear Planner Reuben Arceo,

Southern CA habitat is extremely fragmented. We work continually to keep connections and pockets of ecosystems intact. This mine expansion is contrary to any work we do as full-time volunteers for several groups and agencies. Please do not move forward on this proposal.

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Warner Springs, CA 92086
pamela05n@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Pat Bryan
Lemon Grove, CA 91945
paturodel@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Pat Dufau
San Clemente, CA 92673
pjd92673@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Pat Klaasen
San Diego, CA 92115
pklaasen@juno.com
Dear Planner Reuben Arceo,

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Sincerely,
Pati Tomsits
Irvine, CA 92620
patito12@att.net
Dear Planner Reuben Arceo,

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Sincerely,
Patricia Chamberlain
San Diego, CA 92154
aussie4@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Patricia Farmer
Chula Vista, CA 91911
mkulima7@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Patricia Masuda
Fountain Valley, CA 92708
dboyd95876@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Patricia McDonald
Winter Park, FL 32792
patmcdonald@cfl.rr.com
Dear Planner Reuben Arceo,

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Frankly, I find it hard to believe such incursions into our wildlife areas are even being considered. A loud and emphatic NO would seem appropriate and reasonable. There is no scale on which approval would be found appropriate.

Sincerely,
Patricia O'Reilly
La Mesa, CA 91942
poreilly@pacbell.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Patricia Snively
Fountain Valley, CA 92708
patriciasnively@me.com
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Sincerely,
Patricia Stevens
Oceanside, CA 92054
patriciastevens@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Patricia Weinstock
Rancho Palos Verdes, CA 90275
pat@weinstockaccountancy.com
Dear Planner Reuben Arceo,

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Sincerely,
Patrick Emmett
Bakersfield, CA 93305
pemme001@ucr.edu
Dear Planner Reuben Arceo,

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Sincerely,
Patrick Mulvihill
San Diego, CA 92106
kristenandpat@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Patti Davis
Santa Monica, CA 90403
pattidavis10@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Patti Mickelsen
Laguna Beach, CA 92651
patti@palikea.com
Dear Planner Reuben Arceo,

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Sincerely,
Patty Hatcher
Buena Park, CA 90621
phatcher7@roadrunner.com
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Sincerely,
Paul Hunrichs
Santee, CA 92071
hunrichs@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Paul Marceau
Santa Barbara, CA 93108
marceauunlimited@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Paul Nelson
Camarillo, CA 93010
pnelson22@gmail.com
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Sincerely,
Paul Ramos
Santa Ynez, CA 93460
paulrides@me.com
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Sincerely,
Paul Wellin
San Diego, CA 92131
nrgwell@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Paula Hawkins
San Diego, CA 92104
phawkins1027@gmail.com
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Sincerely,
Paula Hollie
Laguna Woods, CA 92637
phollie7@gmail.com
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Sincerely,
Paula Orbaugh
Carlsbad, CA 92009
orbysontheorb@sbcglobal.net
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Sincerely,
Paula Thompson
San Diego, CA 92117
phthompson7@icloud.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Paula Von Borstel
Jurupa Valley, CA 92509
p.riverca87@yahoo.com
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Sincerely,
Paula Willebrands
Newbury Park, CA 91320
jwillebrands112@yahoo.com
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Sincerely,
paulo reeson
Pasadena, MD 21122
pauloreeson@outlook.com
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Sincerely,
Penelope Prochazka
Simi Valley, CA 93063
propen@sbcglobal.net
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The ONLY time I was ever fortunate enough to see a golden eagle was in the SB Mountains. I was almost 60 years old. Do not take this right and privilege away from the next generation with your destructive, selfish, greedy plans. You gentleman probably have children or at least know some children that mean something to you. Fine, don’t do this for me or CBD, do it for our children and the next generation. This administration is hell bent on destroying our country, please don’t join in.

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Sincerely,

Penny Elia
Laguna Beach, CA 92651
greenp1@cox.net
Dear Planner Reuben Arceo,

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Sincerely,

Peter Bobbermen
Coronado, CA 92118
bobbo.66@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Peter Cummins

00000
cummins.peter@gmail.com
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Sincerely,
Peter Frank
Santa Monica, CA 90404
pcfrank@me.com
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Sincerely,
Peter Kuhn
San Diego, CA 92117
peterkuhnxx@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Peter Weiner
Sugarloaf, CA 92386
peterprops00@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Philip Glaser
Laguna Niguel, CA 92677
pglaser3@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Phillip Cripps
Cathedral City, CA 92234
pcripps@roadrunner.com
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Sincerely,
Polly Lewis
Frazier Park, CA 93225
pelewislll@yahoo.com
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Sincerely,
Polly Pitsker
Huntington Beach, CA 92648
pdp422@yahoo.com
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Sincerely,
Rachel Neeley
Santa Ana, CA 92705
racheldneeley@gmail.com
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Sincerely,
Rachel Peterson
La Jolla, CA 92037
rachel@vikingmd.com
Dear Planner Reuben Arceo,

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Sincerely,
Rachel Zamora
Bakersfield, CA 93313
zamorarachel15@yahoo.com
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Sincerely,
Rachelle Miller
Fullerton, CA 92835
rachelle.clara.miller@gmail.com
Graham Stephens

From: dancingriver@everyactioncustom.com on behalf of Rae Newman
Sent: Friday, August 24, 2018 6:24 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Rae Newman
San Diego, CA 92111
dancingriver@hotmail.com
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Sincerely,
Raleigh Koritz
Minneapolis, MN 55442
tabbykat728@q.com
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Sincerely,
Ralph Bocchetti
Fontana, CA 92337
riverglen2816@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Rand Matsumoto
Torrance, CA 90502
randmatsumoto@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Randall Boltz
San Diego, CA 92111
Portofsherwood@att.net
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Sincerely,
Raquel Karno
Pala, CA 92059
rckarno@icloud.com
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Sincerely,
Ray Sharafi
Ladera Ranch, CA 92694
raysharafi@icloud.com
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Sincerely,
Rayline Dean
Ridgecrest, CA 93555
RaylineDean@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Raymond Capezzuto
Encinitas, CA 92024
rcapman33@aol.com
Dear Planner Reuben Arceo,

Please keep extractive companies out of our National Forests. I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Raymond Smith
Santa Barbara, CA 93105
ray@eri.ucsb.edu
Dear Planner Reuben Arceo,

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Sincerely,
Rebecca Steelman
Rialto, CA 92376
artcityusa@sbcglobal.net
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Sincerely,
Regina Flores
Lake Elsinore, CA 92532
greenvegi@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Regina Logue
Menifee, CA 92586
rehltime@yahoo.com
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Sincerely,
Rena Lewis
Ojai, CA 93023
relew7@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Rena Zaman-Zade
Escondido, CA 92027
rzz9@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Rene Suarez
Buena Park, CA 90620
quiet_mail@hush.com
Dear Planner Reuben Arceo,

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Sincerely,
Renee La Shelle
Lucerne Valley, CA 92356
naynaysay7@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Rhys Marsh
Los Angeles, CA 90077
marsh.email@gmail.com
From: hd37ul@everyactioncustom.com on behalf of Richard Atkinson
<hd37ul@everyactioncustom.com>
Sent: Saturday, August 25, 2018 10:33 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Richard Atkinson
Nedrow, NY 13120
hd37ul@twcny.rr.com
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Sincerely,
Richard Blain
Temecula, CA 92592
blain7@verizon.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Richard Bold
Vista, CA 92084
boldgilman@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Richard Bower
Costa Mesa, CA 92626
rdbower1959@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Richard Cardenas
Santa Fe Springs, CA 90670
rcwikkydartist@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Richard Garner
Chula Vista, CA 91911
wechildrenofearrth@gmail.com
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Sincerely,
Richard Heiser
Los Angeles, CA 90046
RH11TO7@YAHOO.COM
Dear Planner Reuben Arceo,

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Sincerely,
Richard Hieber
87700
ritschi999@web.de
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Sincerely,
Richard Lacues
Ontario, CA 91764
r1948l@verizon.net
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Sincerely,
Richard Schmitt
Hemet, CA 92544
kdschmitt3@hotmail.com
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Please know exactly what environmental measures have been or will be effectively implemented BEFORE moving forward with this proposed action.

Thank you very much for your consideration.

Sincerely,
Richard Spotts
Saint George, UT 84790
raspotts2@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Rick Dow
Camarillo, CA 93012
Richard.dow4@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Rob Roberto
Santee, CA 92071
kingpatsfan@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Rob Seltzer
Malibu, CA 90265
rsscpa@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Robbi Nester
Lake Forest, CA 92630
rknester@gmail.com
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Sincerely,
Robert Clay
San Diego, CA 92122
frobertclay@yahoo.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Robert Conner
Big Bear City, CA 92314
bobbycee55@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Robert Covella
Bloomington, CA 92316
califman472000@yahoo.com
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Sincerely,
Robert Davis
San Diego, CA 92116
ra.davis@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Robert Duckson
Hemet, CA 92543
bob@redbackdigital.com
Dear Planner Reuben Arceo,

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Sincerely,
Robert Harper
La Jolla, CA 92037
rahconsults@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Robert Husbands
San Diego, CA 92117
dingus1942@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Robert Loebl
Coronado, CA 92118
Mexico.kid@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Robert Miller
Imperial Beach, CA 91932
bob@ibmiller.com

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Sincerely,
Robert Rauh
Hesperia, CA 92345
rauhfamily@msn.com
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Sincerely,
Robert Reed
Laguna Beach, CA 92651
robsreed@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Robert Sanders
Temple, GA 30179
bsanders@westga.edu
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Sincerely,
Robert Taylor
Thousand Oaks, CA 91360
res8d4o3@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Roberta Cordero
Santa Barbara, CA 93105
roberta.cordero@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Robin Blier
Saugerties, NY 12477
rockinrobinv@hvc.rr.com
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Sincerely,
Robin Howe
Escondido, CA 92027
robicare2@aol.com
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Sincerely,
Robin Mulligan
Fountain Valley, CA 92708
emnelle@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Robin Reinhart
San Diego, CA 92104
robinreinhart1@gmail.com
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Sincerely,
Robin Russell
Beverly Hills, CA 90210
parkhouse1@mac.com
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Sincerely,
Robin Steudle
Laguna Woods, CA 92637
ROBINLEE04@aol.com
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Sincerely,
Robs Muir
Claremont, CA 91711
robs.muir@gmail.com
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Sincerely,
Rochelle La Frinere
San Diego, CA 92114
rochelle.lafirnere@gmail.com
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Sincerely,
Rodolfo Cano
Buena Park, CA 90621
rodolfocano@sbcglobal.net
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#EnoughIsEnough!

Sincerely,
Ron Frech
Boron, CA 93516
rufrech@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Ron Giddings
Los Osos, CA 93402
rands1625@charter.net
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Sincerely,
Ron Riskin
Santa Barbara, CA 93103
acusurfdoc@cox.net
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Sincerely,
Ronald Partridge
Simi Valley, CA 93063
raturon@sbcglobal.net
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Ronald Ratner
Sioux Falls, SD 57104
bessythree@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Ronit Corry
Santa Barbara, CA 93101
ronit@worldshare.net
Dear Planner Reuben Arceo,

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Sincerely,
Rory Oneill
Santa Barbara, CA 93105
rockymountainanimalrescue@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Rosa Lopez
Panorama City, CA 91402
rosachitis@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Rosa Lucas
Palm Desert, CA 92260
rosa_sue@yahoo.com
Dear Planner Reuben Arceo,

As a San Bernardino resident, I urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Rosalind Bresnahan
San Bernardino, CA 92405
rosalind568@gmail.com
Dear Planner Reuben Arceo,

I'm writing as a biologist, mother & California resident to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to completely disclose exactly how these wildlife populations will be sustained BEFORE any expansion is even contemplated.

Sincerely,
Rose Ann Witt
Thousand Oaks, CA 91362
rawitt@verizon.net
Dear Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Rose Bryan
Lebec, CA 93243
rmr27@me.com
Dear Planner Reuben Arceo,

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Sincerely,
Rose Kabir
Mira Loma, CA 91752
rosekabir@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Rose Luna
Huntington Beach, CA 92647
Roseluna@ymail.com
Dear Planner Reuben Arceo,

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Sincerely,
Roseanne Hovey
San Diego, CA 92117
roseanne.hovey@ga.com
Dear Planner Reuben Arceo,

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Sincerely,
Rosie Hirsch
Camarillo, CA 93012
rosie@rvli.com
Dear Planner Reuben Arceo,

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Sincerely,
Roslyn Jones
Riverside, CA 92506
buffjones@aol.com
Dear Planner Reuben Arceo,

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Sincerely,

Russell Symonds
Costa Mesa, CA 92627
rsymonds@sbcglobal.net
Dear Planner Reuben Arceo,

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Sincerely,
Ruth Gold
San Diego, CA 92130
Goldschmidtr@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Ruth Leary Millington
Somis, CA 93066
atrarescue@aol.com
Dear Planner Reuben Arceo,

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Sincerely,

Ruth Montes De Oca
Los Angeles, CA 90020
montesdeocaruth@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained. THIS IS MY HOME AREA. I LOVE THESE BIRDS AND ANIMALS. PLEASE DON’T DESTROY THEM. THANK YOU.

Sincerely,
Ruth Park
Palm Desert, CA 92211
boojumbabe@verizon.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Ryan Winkleman
Rancho Santa Margarita, CA 92688
rswinkleman@gmail.com
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Sincerely,
S Jitreun
Ann Arbor, MI 48104
sjitreun@yahoo.com
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Sincerely,
Sabrina Eldredge
Irvine, CA 92618
seppieldredge@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Sally Reed
Temecula, CA 92591
sally39552@twc.com
Dear Planner Reuben Arceo,

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Sincerely,
Sally Rentschler
Los Angeles, CA 90007
rentschlersally@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Sam Ezratty
San Juan Capistrano, CA 92675
ezrattys@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Sammy Ehrnman
Rancho Cucamonga, CA 91701
rubymarx@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Samuel Sweet
Goleta, CA 93117
sweet@lifesci.ucsb.edu
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Sandra Boss
Encinitas, CA 92024
Sandyboss@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Sandra Boylston
Sanford, FL 32773
cyclinsandy@yahoo.com
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Sincerely,
Sandra Geyer
Fallbrook, CA 92028
pookienew@gmail.com
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Sincerely,
Sandra Keith
San Diego, CA 92120
jfkslk@aol.com
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Sincerely,
Sandra Welkes
Pine Valley, CA 91962
sandywelles1@sbcglobal.net
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Sincerely,
Sandra Younger
Lakeside, CA 92040
sandrayounger@gmail.com
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Sincerely,
Sandy Stuhaan
Ridgecrest, CA 93555
smstuh@gmail.com
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Sincerely,
sara sexton
Sanger, TX 76266
ssexton@sangertexas.org
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Sincerely,

Sara Tiberio
Moorpark, CA 93021
smtiberio@gmail.com
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Sincerely,

Sarada Lewis
Santa Barbara, CA 93105
happysarada@yahoo.com
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Sincerely,
Sarah Dupree
Carlsbad, CA 92009
sarahdupree@gmail.com
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Sincerely,
Sarah Kalinay
Bakersfield, CA 93311
sarahandi22@aol.com
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Sincerely,
Sarah Kamel
Lake Elsinore, CA 92530
sarahauburnekamel613@gmail.com
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Sincerely,
Saran K.
Los Angeles, CA 90035
sarank@mac.com
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Lastly, please consider the viewshed.

Sincerely,

Scot Martin
Borrego Springs, CA 92004
smartinized@gmail.com
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Sincerely,
Scott Crum
La Mesa, CA 91942
vegibot@yahoo.com
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Sincerely,
Scott Owen
San Diego, CA 92117
scott@hi-q.net
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Sincerely,
Scott Workinger
Yucca Valley, CA 92284
scootps@workhart.com
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Seb Villani
Chula Vista, CA 91912
sebv55@yahoo.com
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Sincerely,
Sejon Ding
Los Angeles, CA 90064
sjding@hotmail.com
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Sincerely,
Shanna Rojas
Hesperia, CA 92345
shanbanan20@gmail.com
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Sincerely,
Shannon Scott
Los Olivos, CA 93441
shannon@shannonscottdesign.com
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Sincerely,
Sharon Keeney
La Quinta, CA 92253
desertpupfish@msn.com
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Sincerely,
Sharon Sprouse
San Diego, CA 92129
sharonsprouse999@gmail.com
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Sincerely,
Sharon Vickery
Adelanto, CA 92301
trouble195815@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Sharon Webster
Huntington Beach, CA 92647
sharongwebster@yahoo.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
shawn johnson
Encinitas, CA 92024
shawninbarca@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Sheila Malone
Yucaipa, CA 92399
queensheila06@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Sheila McGovern
Camarillo, CA 93010
samcgovern3975@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Sheila Shane
Huntington Beach, CA 92649
Sshane3377@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Sheila T.
Moreno Valley, CA 92555
shsrys01@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Shellie Vermeer
Laguna Hills, CA 92653
svermeer1@att.net
Dear Planner Reuben Arceo,

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Sincerely,
Sheree Levy
Simi Valley, CA 93065
shereelevy1@gmail.com
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Sincerely,
Sherma Landess
Rancho Mirage, CA 92270
ShermaINCA@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Sherri Gruszczynski
Laguna Niguel, CA 92677
sherrigruszczynski@mac.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Sherri Schottlaender
San Diego, CA 92103
sschottl@ucsd.edu
Dear Planner Reuben Arceo,

Please REJECT the proposed Omya mine expansion on the north slope of the San Bernardino Mountains. This project is ill-conceived and must rectify key problems before consideration.

Right off the bat, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fails to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. Even worse, the documents fail to include the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County require in current land-use plans.

The draft documents also downplay impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging.

Promising to write management plans for the bighorn and raptors "sometime in the future" misses the point! Plans are required first in order to safeguard critically imperiled animals. Mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors. How will these wildlife populations be sustained if this flawed plan is allowed to go forth?

Sincerely,
Sherron Bull
Kailua Kona, HI 96745
politics@geckohale.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Sherry Marsh
Oceanside, CA 92056
MTASJ@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Shirley Fukuhara
Loma Linda, CA 92354
coles95958@mypacks.net
Dear Planner Reuben Arceo,

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Sincerely,
Sid Shapiro
San Diego, CA 92131
sidcat@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,

Silviana Luna
Sylmar, CA 91342
silverluna91342@yahoo.com
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Sincerely,
Simone Schad Siebert
Encinitas, CA 92024
simone_a_s@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Sofia Okolowicz
Temecula, CA 92592
sofiamokolowicz@gmail.com
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Sincerely,

Sophia Santitoro
Simi Valley, CA 93065
sophia@santitoro.net
Dear Planner Reuben Arceo,

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Sincerely,
Stacey Herzing
Laguna Beach, CA 92651
staceyherzing@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Staci Martin
Carlsbad, CA 92009
islanddaydreamin@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Stacy Cornelius
Laguna Beach, CA 92651
stacycornelius@yahoo.com
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Sincerely,
Stacy Guillen
Oceanside, CA 92056
sguillen@stfrancis-vista.org
Dear Planner Reuben Arceo,

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Sincerely,
Stacy Patel
San Diego, CA 92109
stacypatel@gmail.com
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Sincerely,
Stef Cheneby
Los Osos, CA 93402
stefcheneby@yahoo.com
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Sincerely,
Stephan Foley
Ojai, CA 93023
salexfoley@gmail.com
Dear Planner Reuben Arceo,

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Stephanie De Los Rios
Del Mar, CA 92014
ssbunnies@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Stephanie Glatt
Santa Barbara, CA 93108
stephaniegglatt@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Stephanie Neira
Ontario, CA 91761
smnvet@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Stephanie Rossi
Trabuco Canyon, CA 92679
Stephanie@teamrossi.com
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Sincerely,
Stephanie Seay
Atascadero, CA 93422
Starlet62@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Stephen Anderson
Simi Valley, CA 93063
tangosteve@earthlink.net
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Sincerely,
Stephen Bryne
Ventura, CA 93001
scbryne@gmail.com
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Sincerely,
Stephen Ferry
Santa Barbara, CA 93111
sjferry@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Stephen Fitch Ph.D.
Thousand Oaks, CA 91362
sfitchphd@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable. THE ENVIRONMENT MUST BE PROTECTED! GOLDEN EAGLES AND RARE BIG HORN SHEEP MUST BE PROTECTED!

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Sincerely,
Stephen Kolodny
Beverly Hills, CA 90212
sak@kolodny.us
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Sincerely,
Stephen Zaharias
Lompoc, CA 93436
stepenzaharias93458@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,

Steve Downing
Santa Barbara, CA 93109
stevedowning@cox.net
Dear Planner Reuben Arceo,

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Sincerely,

Steve Gross
La Mesa, CA 91941
stevegross2845@gmail.com
Dear Planner Reuben Arceo,

I served as the Forest Biologist on the San Bernardino National Forest for 30 years. This part of the Forest has very important biological resources and processes that are found nowhere else on Earth. Maintaining biological diversity was one of the primary goals of the Forest Plan. Rushing this approval through without proper analysis and mitigation could greatly affect the biodiversity of the Forest and San Bernardino County.

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Steve Loe
Yucaipa, CA 92399
steveloe01@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Steve Prince
Eugene, OR 97405
cands78@comcast.net
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Sincerely,
Steven F. Stroh
Los Angeles, CA 90041
stevenfrancisstroh@gmail.com
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Sincerely,
Steven White
Santa Monica, CA 90402
swhite@angelogordon.com
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Sincerely,
Stewart Casey
Garden Grove, CA 92841
stewartcsy@yahoo.com
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Sincerely,
Sue Goodrich
Valley Center, CA 92082
sue.goodrich@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,

Sue Kemnitzer
San Juan Capistrano, CA 92675
susankem@aol.com
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Sincerely,
Susaan Aram
Dana Point, CA 92629
mermaidlaguna@aol.com
Dear Planner Reuben Arceo,

PLEASE HAVE INTEGRITY AND STAND UP AGAINST THE CONSTANT ATTACKS FROM BIG INDUSTRY. THEIR ONLY INTEREST IS GREED.

LEAVE A LEGACY OF BEAUTY AND WILDERNESS NOT ONE OF DESTRUCTION AND POLLUTION.

DO THE HONORABLE AND JUST THING... AND SAY NO TO THIS DISASTEROUS PLAN.

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Susan Allen
Lake Forest, CA 92630
sallen@autoeveramerica.com
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Sincerely,
Susan Anderson
Seal Beach, CA 90740
suinmarin@gmail.com
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Seal Beach, CA 90740
suinmarin@gmail.com
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Sincerely,
Susan Bohannan
Santa Ana, CA 92706
sbohan1010@aol.com
From: nasuscooper@everyactioncustom.com on behalf of Susan Cooper
<nasuscooper@everyactioncustom.com>
Sent: Friday, August 24, 2018 2:37 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Susan Cooper
Tustin, CA 92780
nasuscooper@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Susan Davenport
Simi Valley, CA 93063
suedcpa@hotmail.com
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Sincerely,
Susan Hutchison
Big Bear City, CA 92314
hutchison.susan@yahoo.com
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Sincerely,
Susan Kelly
Bonsall, CA 92003
kelly3794@att.net
Dear Planner Reuben Arceo,

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Sincerely,
Susan Mayer
San Diego, CA 92109
artersa@att.net
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Sincerely,

Susan Pitts
Cambria, CA 93428
susan.pitts@earthlink.net
Dear Planner Reuben Arceo,

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Sincerely,
Susan Posner
Oceanside, CA 92057
love2laugh2@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Susan Seger
Newport Beach, CA 92660
qoqa@propkg.com
Dear Planner Reuben Arceo,

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Sincerely,

Susan Stroud
Oxnard, CA 93036
annihilateautism@yahoo.com
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Sincerely,
Susan West
Lake Forest, CA 92630
cats4sooz@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Susan Wishner
Nipomo, CA 93444
swishner22@yahoo.com
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Sincerely,
Susanne Wood
Santa Barbara, CA 93105
Billandsusanne@yahoo.com
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Sincerely,
Susie Lee
La Habra, CA 90631
susielee.526@gmail.com
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Sincerely,
Suzanne Castle
Victorville, CA 92395
smc thatsme@gmail.com
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Sincerely,
Suzanne J Conlon
San Diego, CA 92105
sjc0613@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Suzanne Narducy
San Clemente, CA 92673
suz_msa@msn.com
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Suzanne Sparks
La Quinta, CA 92253
suzannesparks2292@gmail.com
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Sincerely,
Suzanne Thomas
San Diego, CA 92122
suzannet.thomas@gmail.com
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Sincerely,
Sylvia Selverston
San Diego, CA 92111
sillygranma@yahoo.com
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Sincerely,

Taj Patel
Chatsworth, CA 91311
tejalsachin1214@gmail.com
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Sincerely,
Tamara Cibellis
Escondido, CA 92026
tamaramr2@yahoo.com
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Sincerely,
Tamara G
Fallbrook, CA 92028
tgoldsby@ucsd.edu
Dear Planner Reuben Arceo,

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Sincerely,
Tamara Hulsey
El Cajon, CA 92020
hulseyrayborn@yahoo.com
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Sincerely,

Tamera Dolcini
Riverside, CA 92505
cheetahkit@my.com
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Sincerely,
Tami McCready
Simi Valley, CA 93063
stevenmccready@roadrunner.com
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Sincerely,

Tami Palacky
Springfield, VA 22153
tpalacky@gmail.com
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,

Tammy Bullock
El Cajon, CA 92021
tamibullock@yahoo.com
 Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tammy Gillingham
Victorville, CA 92395
siriprontg@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Tammy Plante
Palm Springs, CA 92262
retrodish@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tansy Woods
San Diego, CA 92101
Tansy.woods@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Tanya Manjarrez
Los Angeles, CA 90019
manjarrez.tanya@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tara Gonzales
Atascadero, CA 93422
Nocona81@hotmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Tawny Sherrill
Garden Grove, CA 92845
tsherril@csulb.edu
Graham Stephens

From: Missteal@everyactioncustom.com on behalf of Teal McFarland
Sent: Friday, August 24, 2018 10:01 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Teal McFarland
Palm Springs, CA 92264
Missteal@icloud.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tere Albanese
Sierra Madre, CA 91024
Tere@Animalip.com
Dear Planner Reuben Arceo,

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Sincerely,

Teresa Bippert-Plymate
Big Bear City, CA 92314
teresa@lbti.org
Dear Planner Reuben Arceo,

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Sincerely,
Teresa Winsor
San Diego, CA 92104
englishflower@cox.net
Dear Planner Reuben Arceo,

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Sincerely,
Teri Duchac
Aliso Viejo, CA 92656
mspooh563@aol.com
Dear Planner Reuben Arceo,

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Sincerely,
Teri Wermuth
Torrance, CA 90505
terieileen@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Terre Dunivant
San Luis Obispo, CA 93401
nature2design@yahoo.com

From: nature2design@everyactioncustom.com on behalf of Terre Dunivant
<nature2design@everyactioncustom.com>
Sent: Friday, August 24, 2018 3:46 PM
To: Arceo, Reuben
Subject: No Omya Mine Expansion
Dear Planner Reuben Arceo,

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Sincerely,
Terry S.C.
Santa Maria, CA 93455
dlpotc@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Terry Scarpellino
Victorville, CA 92392
sammygram@live.com
Dear Planner Reuben Arceo,

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Sincerely,
Thea Wang
Los Angeles, CA 90026
thealetter.tw@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
THomas Conroy
Manhattan Beach, CA 90266
trconroy@yahoo.com
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Sincerely,
Thomas Hernandez
Corona, CA 92881
GWFan2003@yahoo.com
Dear Planner Reuben Arceo,

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Say NO to mine expansion!

Sincerely,
Thomas Knecht
Avila Beach, CA 93424
th.pa.knecht@gmail.com
Dear Planner Reuben Arceo,

I’m writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tim Brady
Aliso Viejo, CA 92656
purplehazent@mac.com
Graham Stephens

From: tgd223@everyactioncustom.com on behalf of Tim Dressel <tgd223@everyactioncustom.com>
Sent: Friday, August 24, 2018 8:50 AM
To: Arceo, Reuben
Subject: No Omya Mine Expansion

Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tim Dressel
San Diego, CA 92109
tgd223@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Tim Hayes
San Diego, CA 92115
huixli@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,

Tim Maurer
Anaheim, CA 92808
we8575tim@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Tim Ryan
Capistrano Beach, CA 92624
janemarie19@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,

Tim Wilson
Poway, CA 92064
dwilson2@cox.net
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

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Sincerely,
Timothy Davis
Garden Grove, CA 92845
Tsdavis54@yahoo.com
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Sincerely,
Timothy Villalobos
Spring Valley, CA 91977
tim_villalobos@yahoo.com
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Sincerely,
Tina Mellone
San Diego, CA 92111
tinabadina9@verizon.net
Dear Planner Reuben Arceo,

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Sincerely,
Toby Ann Reese
Valley City, OH 44280
tobyareese@zoominternet.net
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Sincerely,
Tom Chester
Fallbrook, CA 92028
tom@tchester.org
Dear Planner Reuben Arceo,

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Sincerely,
Tom Peterson
Palo Verde, CA 92266
tompetersoncollection@hotmail.com
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Sincerely,
Tom Rummel
San Diego, CA 92104
greenthumbsd@gmail.com
Dear Planner Reuben Arceo,

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Sincerely,
Toni Tiritilli
La Quinta, CA 92253
tonimtill@gmail.com
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Sincerely,
Tracy Gilbert
Rialto, CA 92377
tgilbert@californiasteel.com
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Sincerely,
Tracy Shortle - Turner
Los Alamitos, CA 90720
tracyshortle@yahoo.com
Dear Planner Reuben Arceo,

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Sincerely,
Travis Benneian
Lake Elsinore, CA 92532
tjbenneian@gmail.com
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Sincerely,
Tricia Keen
Ventura, CA 93001
triciakeen@yahoo.com
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Sincerely,
Trish McCall
Santa Monica, CA 90404
mccall.trish@gmail.com
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Tristen Fierro
Whittier, CA 90602
tristenmfierro@gmail.com
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Tulsi Milliken
Fallbrook, CA 92028
tulsi@inphases.com
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Twyla Meyer
Pomona, CA 91767
tmmacc15@aol.com
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Veronica B.
Placerville, CA 95667
fadavero@gmail.com
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Sincerely,

Vickey Baker
Harlan, IA 51537
doghaven@harlannet.com
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Vicki Bingaman
Frazier Park, CA 93225
vbrehabber@gmail.com
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Sincerely,
Vicki Hughes
Huntington Beach, CA 92648
vdh2810@gmail.com
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Sincerely,
Victor Paglia
Newport Beach, CA 92663
vic_paglia@hotmail.com
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Sincerely,
Victoria Peyser
Newark, DE 19711
vpeyser@msn.com
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Sincerely,
Victoria Robor Roberts
Grover Beach, CA 93483
vicsiris1@gmail.com
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Sincerely,
Victoria Shankling
Aliso Viejo, CA 92656
vshankling@cox.net
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Sincerely,
Victoria Silver
Irvine, CA 92617
vasilver@uci.edu
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Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Virginia Bennett
Honolulu, HI 96822
vbennett@hawaii.edu
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Sincerely,

Virginia Ferguson
San Diego, CA 92106
budgingy@gmail.com
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Sincerely,

Virginia Sharkey
San Diego, CA 92103
V.sharkey@sbcglobal.net
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Sincerely,
Vong Do
Garden Grove, CA 92840
hccvad@yahoo.com
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Sincerely,
W G Wallin
Thousand Oaks, CA 91362
furryboys3@roadrunner.com
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Sincerely,
Walter C Steffen
Escondido, CA 92027
wcsteffen43@yahoo.com
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Sincerely,
Walter Erhorn
Spring Valley, CA 91979
waltererhorn@cox.net
Dear Planner Reuben Arceo,

You know this is Wrong.
DO THE RIGHT THING.

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Sincerely,
Wanda Hendrix
Morro Bay, CA 93442
hiwandada@gmail.com
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Sincerely,
Wayne Kastner
Costa Mesa, CA 92627
wkastner@sbcglobal.net
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Sincerely,
wendy alvarez
Pico Rivera, CA 90660
w.alvarez@pacbell.net
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Sincerely,
Wendy McCarthy
Santa Ana, CA 92705
wmmccarthy7@gmail.com
Dear Planner Reuben Arceo,

We can not continue to trash our planet. Our lands, waters, and the very air we breathe are already toxic. Do not go forward with this plan.

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Sincerely,
Wendy Raymond
Laguna Niguel, CA 92677
hampster@vzw.blackberry.net
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Wendy Wittl
Santa Barbara, CA 93105
wjwittl@cox.net
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Sincerely,
Wesley Rogneby
San Luis Obispo, CA 93401
wesleyrogneby@yahoo.com
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Wewe Fers
Irvine, CA 92604
wendyfears@gmail.com
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Sincerely,
William Buring
Upland, CA 91786
boyblue05@gmail.com
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Sincerely,

William Dane
Rancho Cucamonga, CA 91701
williamzmail@yahoo.com
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Sincerely,
William Engs
Highland, CA 92346
engs@juno.com
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Sincerely,
William Grosh
El Centro, CA 92243
groshjrw@earthlink.net
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Sincerely,
William Hewes
Simi Valley, CA 93063
mrwrh@sbcglobal.net
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Sincerely,
William Willis
Garden Grove, CA 92841
billythekid189@yahoo.com
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Sincerely,
Winn Adams
Bellingham, WA 98229
1305wa@gmail.com
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Sincerely,

Woody Maxwell
Ventura, CA 93001
pwderman6@aol.com
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Sincerely,
Yomaira Jaramillo
Chino, CA 91710
bordeaux825@yahoo.com
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Sincerely,
Yuriko Hazlett
Oxnard, CA 93036
ynmnh@hotmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

The draft documents also downplay the impacts to the beleaguered and isolated Cushenbury herd of bighorn sheep, as well to golden eagles and other raptors that have used the adjacent areas for nesting, roosting and foraging. Mine blasting can cause nest abandonment, and quarry expansion would reduce crucial foraging areas for these raptors.

Promising to write management plans for the bighorn and raptors sometime in the future provides absolutely no safeguards for these critically imperiled animals if the mine expands. You need to first disclose exactly how these wildlife populations will be sustained.

Sincerely,
Yuru Feng
Santa Barbara, CA 93111
feng.yuru@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

First, the draft environmental impact report and environmental impact statement for the proposed Butterfield and Sentinel Quarry Expansion fail to provide adequate information to the public about the harms that would come to the plants and animals that call this area home. The documents also fail to incorporate the protective measures required by the Carbonate Habitat Management Strategy that both the Forest Service and San Bernardino County have signed onto for their current land-use plans.

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Thank you for your care, concern, and consideration.

Sincerely,

Yvonne Smith
Upland, CA 91784
leilanismith33@gmail.com
Dear Planner Reuben Arceo,

I'm writing to urge you to deny the proposed Omya mine expansion on the north slope of the San Bernardino Mountains and send this project back to the drawing board. There are several key problems with the current plan that are unacceptable.

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Sincerely,
Z'ava Rosen
Indio, CA 92203
zdancer@gmail.com
Appendix B: Final EIR/EIS Distribution List
<table>
<thead>
<tr>
<th>Address</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Big Bear Lake&lt;br&gt;39707 Big Bear Boulevard&lt;br&gt;Big Bear Lake, CA 92315-8900</td>
<td>Community Development&lt;br&gt;City of Hesperia&lt;br&gt;9700 7th Avenue&lt;br&gt;Hesperia, CA 92345</td>
</tr>
<tr>
<td>City of Big Bear Lake&lt;br&gt;P.O. Box 10000&lt;br&gt;Big Bear Lake, CA 92315-8900</td>
<td>Community Development&lt;br&gt;City of Hesperia&lt;br&gt;15776 Main Street&lt;br&gt;Hesperia, CA 92345</td>
</tr>
<tr>
<td>Planning Department&lt;br&gt;City of Victorville&lt;br&gt;14343 Civic Drive&lt;br&gt;Victorville, CA 92392</td>
<td>Planning Department&lt;br&gt;City of Victorville&lt;br&gt;14343 Civic Drive&lt;br&gt;Victorville, CA 92392</td>
</tr>
<tr>
<td>Cole &amp; Marley&lt;br&gt;1900 Avenue of the Stars, Suite 2430&lt;br&gt;Los Angeles, CA 90067</td>
<td>Attn: Robert Perdue&lt;br&gt;Colorado River Regional Water Quality Control Board&lt;br&gt;73-720 Fred Waring Drive, Suite 100&lt;br&gt;Palm Desert, CA 92260</td>
</tr>
<tr>
<td>Attn: Tom Rabone&lt;br&gt;Cushenbury Mine Trust&lt;br&gt;9788 Sierra Avenue&lt;br&gt;Fontana, CA 92335</td>
<td>Office of Mine Reclamation&lt;br&gt;Department of Conservation&lt;br&gt;801 K Street, MS 24-01&lt;br&gt;Sacramento, CA 95814</td>
</tr>
<tr>
<td>Office of Mine Reclamation&lt;br&gt;Department of Conservation&lt;br&gt;801 K Street, MS 09-06&lt;br&gt;Sacramento, CA 95814-3529</td>
<td>Desert Studies Consortium&lt;br&gt;800 N. State College Boulevard&lt;br&gt;Fullerton, CA 92634</td>
</tr>
<tr>
<td>Desert Survivors&lt;br&gt;1290 Hopkins Street, #37&lt;br&gt;Berkeley, CA 94702</td>
<td>Desert Survivors&lt;br&gt;P.O. Box 20991&lt;br&gt;Oakland, CA 94620-0991</td>
</tr>
</tbody>
</table>
OMYA California
P.O. Box 825
Lucerne Valley, CA 92356

Pacific Crest Trail Association
1331 Garden Highway
Sacramento, CA 95833

Planning & Conservation League
1107 9th Street, Suite 360
Sacramento, CA 95814

Attn: Jared Blumenfeld
Region 9 Administrator-EPA
75 Hawthorne Street
San Francisco, CA 94105

Inland Empire West
Resource Conservation District
25864 Business Center Drive, Suite K
Redlands, CA 92374

Rialto Branch Library
251 W. 1st Street
Rialto, CA 92376

Running Springs Branch Library
31976 Hilltop Boulevard
Running Springs, CA 92382

RWQCB Colorado Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

San Bernardino County
County Geologist
0181,

San Bernardino County
Public Health, Division of Environmental Health Services
0160,

San Bernardino County
A&E
0184,

Patrick Egle/Michael R. Perry, Supervising Planner
San Bernardino County
Public Works-Transportation/Flood Department
0835,
Attn: Thomas Hall, Environmental Coordinator
San Bernardino National Forest
602 S. Tippecanoe Avenue
San Bernardino, CA 92408

Attn: Stacy Gorin
San Bernardino National Forest Assn.
602 S. Tippecanoe Avenue
San Bernardino, CA 92408

Attn: Sarah Miggins
San Bernardino National Forest Association
602 S. Tippecanoe Avenue
San Bernardino, CA 92408

Attn: Kirk Stitt
San Bernardino Valley Audubon
P.O. Box 10973
San Bernardino, CA 92423-0973

Attn: Carla Rodriguez
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Attn: Daniel McCarthy
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Attn: Ann Brierty, Cultural Resources Field Manager
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Attn: Clifford W. Batten
San Manuel Band of Mission Indians
26570 Community Center Drive
Highland, CA 92347

Attn: James Ramos
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Attn: Anthony Madrigal, Cultural Resources Director
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

SANBAG
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410-1715

Conservation Program Coordinator
Sierra Club - San Gorgonio Chapter
4079 Mission Inn Avenue
Riverside, CA 92501
Sierra Club, Big Bear Group  
P.O. Box 3048  
Big Bear Lake, CA 92315

Attn: Dave Barrie  
Sierra Club, Mountains Group  
P.O. Box 708  
Blue Jay, CA 92317

Attn: Richard A. Conti  
Society for the Conservation of Bighorn Sheep  
5029 Vincent Avenue  
Eagle Rock, CA 90041-2220

Attn: Dr. Barry Wallerstein  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4182

Southern California Edison  
P.O. Box 800  
Rosemead, CA 91770

Southern California Edison  
12353 Hesperia Road  
Victorville, CA 92392

Specialty Minerals Inc.  
P.O. Box 558  
Lucerne Valley, CA 92356

Specialty Minerals Inc., Performance Minerals  
35 Highland Avenue  
Bethlehem, PA 18017-9482

Attn: Judy Anderson  
Sierra Club, Desert Committee  
4134 Oceanview Boulevard  
Montrose, CA 91020

Attn: Ralph Salisbury  
Sierra Club, San Gorgonio Chapter  
4079 Mission Inn Avenue  
Riverside, CA 92501-3204

SOFA  
P.O. Box 22  
Lake Arrowhead, CA 92352

Attn: Ian MacMillan  
South Coast Air Quality Management District, CEQA Inter-Governmental Review  
21865 Copley Drive  
Diamond Bar, CA 91765-4182

Southern California Edison  
P.O. Box 800  
Rosemead, CA 91770

Specialty Minerals Michigan, Inc.  
405 Lexington Avenue, 19th Floor  
New York, NY 10174
Town of Apple Valley, Community Development
22573 Outer Highway 18
Apple Valley, CA 92307

Tri-County Conservation League
P.O. Box 51127
Riverside, CA 92517

Division of Endangered Species
U.S. Fish & Wildlife Service
2800 Cottage Way, Room W-2606
Sacramento, CA 95825

Attn: John M. Taylor
U.S. Fish and Wildlife Service
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, CA 92262

Attn: Jim Bartel
U.S. Fish and Wildlife Service, Carlsbad Field Office
6010 Hidden Valley Road, Suite 101
Carlsbad, CA 92011

Forest Supervisor's Office
U.S. Forest Service
602 S. Tippecanoe Avenue
San Bernardino, CA 92408

USDA Natural Resources Conservation District
25864 Business Center Drive, Suite K
Redlands, CA 92374

Attn: Danny F. Bogner
P.O. Box 1432
Sugarloaf, CA 92386-7497

Attn: Linda Quiroz
P.O. Box 2285
Big Bear City, CA 92314
Appendix C: North Slope Raptor Conservation Strategy
(San Bernardino National Forest, July 2019)
NORTH SLOPE
RAPTOR CONSERVATION STRATEGY

July 2019

INTRODUCTION

Strategic Approach: The San Bernardino National Forest (SBNF) has developed this Raptor Conservation Strategy (RCS) for the San Bernardino Mountain’s North Slope in coordination with the mining companies, U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW).

The SBNF and the three North Slope mining companies (Mitsubishi, Omya, and Specialty Minerals) are cooperatively participating in the monitoring of nesting special status raptors on the SBNF’s North Slope of the San Bernardino Mountains. “Special status” refers to species that are included on a federal or state list for species of special concern. At the time of RCS development, special status raptors known or suspected to nest on or near the North Slope include golden eagle (CDFW fully-protected species, Bald and Golden Eagle Protection Act, a CDFW Watchlist, SBNF Watchlist) and prairie falcon (CDFW Watchlist, SBNF Watchlist) and prairie falcon (CDFW fully-protected species, USFWS Bird of Conservation Concern, Forest Service Sensitive) and California condor (federally and state-endangered). While the RCS shall apply to all of these species, monitoring requirements (described later) will be applied to prioritize species expected or documented in the North Slope area, or subject to known population threats. Over the life of the RCS, species may be added or removed from the priority depending on new information about raptor species’ populations and geographic range.

The objective of the RCS is to provide consistent objectives, management action guidance, and management tools across the affected mining companies on the North Slope. Omya, Specialty Minerals, and Mitsubishi have provided input to the development and finalization of the RCS. The RCS has been tailored for activities associated with mining activities and effects.

The RCS is expected to be a dynamic document, updated as new information and scientific understanding of the subject species become available. The RCS may be updated over time to include other raptors if concerns develop over their local population status. The strategy includes monitoring objectives, schedules, and protocols, as well as measures to avoid, minimize, rectify, and reduce (or eliminate over time) effects to raptors nesting in the North Slope from mining and National Forest land and resource management activities. The intent is to use systematic monitoring of raptor breeding and non-breeding behavior, chronology, occupancy, and reproductive success to develop and refine site- and activity-specific measures to ensure successful nesting and provide for adaptive management opportunities.

Due to the long life of the mining projects and potential for new technologies (both in raptor monitoring and mining), and the uncertainty of long-term raptor population trends, the RCS will be reviewed and updated as necessary periodically with a goal of at least every five years by the parties of the RCS (Omya, Mitsubishi, Specialty Minerals, CDFW, SBNF, and USFWS).

The intent of the RCS is to:

- Ensure compliance with state and federal laws (Bald and Golden Eagle Protection Act,
Migratory Bird Treaty Act, California Endangered Species Act, federal Endangered Species Act, California Fish and Game code, etc.)

- Provide guidelines designed to avoid take of State fully protected species and for avoiding or reducing the likelihood of “take” of all other State or Federally-protected species; and provide direction for acquiring an incidental take authorization, if necessary and legally permissible.

- Describe an adaptive management approach that provides protection of nests while continuing the mining operations and other activities. The purpose of adaptive management is to improve long-term management outcomes by recognizing where key uncertainties impede decision-making, seeking to reduce those uncertainties over time, and applying that learning to subsequent decisions (Walters 1986). The goal is to reduce uncertainty for mining operators and for raptor management.

- Provide continuity and a unified approach for managing nesting raptors and their habitat on the North Slope for the mine operators in the area. By taking this approach, the parties may combine efforts, reducing costs and redundancy.

- Identify conflicts in management direction (e.g., helicopter surveys may be the most efficient survey method for raptor nesting but may cause disturbance to bighorn sheep) and trade-offs to ensure that management decisions are made taking those issues into account.

For the purposes of this RCS, the North Slope of the San Bernardino Mountains is described as the steep north-facing slope that rises from the Mojave Desert floor to the top of the ridge, from Grapevine Canyon road on the west to Arrastre Creek on the east. The area is roughly displayed in Figure 1.

**BACKGROUND**

The North Slope’s rugged terrain rises from the Mojave Desert floor. The steep slopes have an abundance of rocky pinnacles, outcrops, rock crevice formations, rock ledges, cliff potholes, and cliffs. These areas provide excellent nest sites for birds, including several cliff-nesting nocturnal and diurnal raptors such as great-horned owls, golden eagles, California condors, peregrine and prairie falcons, red-tailed hawks, and other raptors.

The vegetation on the North Slope includes 1) pinyon/juniper woodland and montane conifer forests at the rim; 2) a pinyon/juniper-desert transition zone that includes Joshua trees, pinyon pines, junipers, yuccas, and desert shrubs; and, 3) high desert vegetation at the base of the mountain slopes. All of these vegetation communities provide foraging and nesting habitat for raptors and their prey. The rugged terrain and deep canyons/drainages also have suitable foraging and nesting sites. Golden eagles are known to nest in and near the North Slope and prairie falcons are suspected nesters. Both species are known to forage in and near the North Slope.
a) Golden Eagle (*Aquila chrysaetos*)

The golden eagle is a SBNF Watchlist species, identified by the Forest Service as having a local viability concern, a CDFW Watchlist species, a California state fully-protected species. It is protected under the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act (MBTA; Executive Order 13186), and the California Fish and Game Code.

**Life History and Baseline Information:** In California, golden eagles are an uncommon permanent resident and migrant throughout most of the state, except the floor of the Central Valley (*Ziener et al. 1990*). This species ranges from sea level to 11,500 feet (*Ziener et al. 1990*). It is a year-round resident in southern California (*Pagel, pers. comm. 2013, Kochert *et al. 2002*). Historically, golden eagles were considered more abundant in remote parts of southern California than anywhere else in the United States (*Ziener et al. 1990*).

Golden eagles nest primarily on cliffs in southern California but will also nest in trees (*Pagel, pers. comm. 2013*). They build their nests on cliff ledges or in trees, typically 10-100 feet above the ground. As a species that is skittish about human intrusion, they often occupy remote mountain ranges and upland areas, often at or above tree line where vegetation is short or sometimes absent. Southern California’s golden eagles generally avoid nesting in heavily-forested mountains and coastal or urban areas. They hunt for rabbits and other small mammals in nearby open habitats, such as grasslands, oak savannas, and open shrublands. Also a scavenger, golden eagles will forage on large dead animals (*Ferguson-Lees and Christie 2001, Garrett and Dunn 1981, Pagel, pers. comm. 2013, Kochert *et al. 2002*).

Wintering habitats in the western United States tend to include perches and native shrub-steppe vegetation types (*e.g.*, comprising *Artemisia* and similar shrubs). Habitats with these characteristics typically support substantial prey populations of black-tailed jackrabbits (*Lepus californicus*) (*Johnsgard 1990, Kochert and Steenhof 2002, Kochert *et al. 2002*).

The golden eagle breeding season in southern California begins in early-mid December. Chicks fledge through July (*Pagel, pers. comm. 2013*). The nest is constructed of branches, twigs, and is added to during the courtship phase of the nesting period. A nest can be quite large and may become more massive with successive use. Alternative nest sites within the breeding territory are occasionally used; a nesting territory typically consists of one to four nests, but up to 18 different nest sites per territory has been documented (*Kochert and Steenhof 2012*). Golden eagles are known to have re-occupied nests that have been vacant for 30-40 years (*Kochert and Steenhof 2012*).

Females typically lay 1-3 eggs and incubate them for 43–45 days. The semi-altricial eaglets are brooded by the female for an additional 30 days. The young fly at about 60-70 days, remaining near the nest site for a few weeks to months (*Baicich and Harrison 1997, Zeiner *et a. 1990, Pagel, pers. comm. 2013*). Typically, the nest is occupied for about 16 weeks total during the breeding season. Territory fidelity in adult golden eagles is high. Juvenile golden eagles disperse from their natal area. After dispersal, they live nomadically until they establish a territory during the fall of their first year (*Pagel, pers. comm. 2013*).
In California, golden eagles are resident year-round; however, eagles that nest outside the state also visit California during migration and winter, and nomadic subadults and adult “floater” (i.e., unmated or non-territorial) eagles may travel between California and other regions. Eagles may move altitudinally and latitudinally seasonally and/or in response to changing weather conditions; they may also move upslope after the breeding season (Ziener et al. 1990, Katzner et al. 2012, Pagel 2013, pers. comm.).

Golden eagles will occasionally hunt from an exposed perch, flying directly toward prey, or will hunt from soaring or low ground-level flights (Ziener et al. 1990, Kochert et al. 2002). Golden eagles eat primarily lagomorphs and rodents, but they will also take other mammals, reptiles, carrion, and birds (Johnsgard 1990, Dunne et al. 1988). Studies of golden eagle diet indicate that mammals often comprise 82 percent of the diet, supplemented by birds at 12.6 percent, with the remainder consisting of reptiles and fish (Ziener et al. 1990).

During the breeding season, golden eagles are highly territorial, and monogamous pairs may occupy a territory repeatedly over their life span. Territorial boundaries are well defined and vigorously defended. Golden eagles tend to nest on the periphery of an adjacent eagle’s territory. Territorial size is dependent on food resources available (Pagel, pers. comm. 2013) and varies in S. California (Katzner et al. 2012). Outside the breeding season, the eagles disperse widely and do not maintain territories.

Population Status and Threats – Golden Eagle: Threats to golden eagles include powerlines (electrocutions and collisions), contaminants (e.g., lead poisoning from scavenging on carcasses containing spent lead ammunition, secondary poisoning from rodenticides, etc.), intentional shooting/poaching, incidental trapping in fur bearer traps, drowning in stock-tanks, vehicle collisions, habitat loss, collisions with other structures including large-scale non-renewable and renewable energy developments, and disturbance to nest sites (Kochert et al. 2002, USFWS 2010, DeLong 2004, Ruddock and Whitfield 2007). Another threat is poaching due to black market demand (Pagel, pers. comm. 2013).

Near National Forest System lands in southern California, golden eagles are affected by private land development and rapid urbanization that encroaches on key foraging areas. There appears to be abundant nesting habitat on public land, but in many places the highest quality foraging areas are on private land. (Source: USFS Forest Plan 2006)

Increased recreational activity, particularly rock climbing and hiking, in the vicinity of cliff nests is also a problem in some areas and can cause golden eagles to abandon nest sites. Mining activities on the North Slope of the San Bernardino Mountains may also be a threat to golden eagles if mining results in disturbance to nesting cliffs. (Source: USFS Forest Plan 2006, USFWS 2010)

Mortality of golden eagles as a result of wind turbine collisions has been high (79 between 1997 and 2012 in 10 states) (Pagel et al. 2013). Large-scale solar panel projects result in losses of large acreages of foraging habitat for golden eagles. Within the foreseeable future, a number of new renewable energy projects are expected to come online in California’s deserts, as suggested by the number of applications for renewable energy projects.
Those combined with existing developments and other threats to golden eagles contribute to the concern for the golden eagle population in the western U.S. Given the current situation for golden eagles, there are concerns about cumulative effects for this species due to multiple threats (Pagel, pers. comm. 2013).

**Occurrence on the North Slope – Golden Eagle:** Golden eagles are known to nest on and near the North Slope. Four nesting territories, each with several nest structures, have been identified on the North Slope. Additional territories are known from farther to the southeast, west, and north.

The North Slope supports suitable foraging habitat and there are a number of records for observed golden eagles in the North Slope area (Kielhold 1993, MacKay and Thomas 2008, SBNF records), including using wildlife drinkers at the mines.

**Take – Golden Eagle:** The Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668-668c), enacted in 1940, and amended in 1962, prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald and golden eagles, including their parts, nests, or eggs. Under the Eagle Act, “take” is defined as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest or disturb.” “Disturb” is defined in regulations as “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available: (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.” (50 C.F.R. § 22.3.)

In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment (Federal Register 74 (175): 46835-46879 9/11/09).

The regulation set forth in 50 CFR § 22.26 provides for issuance of permits to take golden eagles where the taking is associated with but not the purpose of the activity and cannot practically be avoided. Most take authorized under this section will be in the form of disturbance; however, permits may authorize non-purposeful take that may result in mortality.

The regulation at 50 CFR § 22.27 establishes permits for removing eagle nests where: (1) necessary to alleviate a safety emergency to people or eagles; (2) necessary to ensure public health and safety; (3) the nest prevents the use of a human-engineered structure; or (4) the activity or mitigation for the activity will provide a net benefit to eagles. Only inactive nests may be taken, except in the case of safety emergencies. Inactive nests are defined by the continuous absence of any adult, egg, or dependent young at the nest for at least 10 consecutive days leading up to the time of take. (Source: http://www.fws.gov/migratorybirds/BaldAndGoldenEagleManagement.htm)
b) California Condor (*Gymnogyps californianus*)

The California condor is both federally and state listed as Endangered. Critical Habitat has been designated (1976) but none is present on the North Slope. A Recovery Plan exists for this species.

**Life History and Baseline Information - California Condor:** From 100,000 to 10,000 years ago, California condor ranged widely; with the extinction of the large Pleistocene mammals, the species declined in range and numbers. Condor remains reveal that the species once ranged over much of western North America, and as far east as Florida. Until about 2,000 years ago, the species nested in west Texas, New Mexico, and Arizona. When European settlers arrived on the Pacific coast of North America in the early 1800s, California condors occurred from British Columbia to Baja California, and also occasionally ranged into the American southwest.

Historically, California condor occurred in the Coast Ranges of California from Santa Clara and San Mateo Counties south to Ventura County, and east to the western slope of the Sierra Nevada and Tehachapi Mountains. It occurred primarily from sea level to 9,000 feet and nested at 2,000-6,500 feet. Almost all of the historic nest sites used by California condors are located on the Los Padres, Angeles, and Sequoia National Forests.

California condor nesting sites are typically located in chaparral, conifer forest, or oak woodland communities. Historically, condors nested on bare ground in caves and crevices, behind rock slabs, or on large ledges or potholes on high sandstone cliffs in isolated, extremely steep, rugged areas. Cavities in giant sequoia (*Sequoiadendron giganteum*) have also been used. The nest site is often surrounded by dense brush.

The appearance of many nest sites suggests that they have been long used, perhaps for centuries, whereas other apparently suitable sites in undisturbed areas show no signs of condor use. Characteristics of condor nests include:

- entrances were large enough for the adults to fit through;
- large enough entrances for the adults to fit through;
- a ceiling height of at least 14.8 inches at the egg position;
- fairly level floors with some loose surface substrate;
- un-constricted nest site for incubating adults; and
- a nearby landing point.

Condors often return to traditional sites for perching and resting. Traditional roost sites include cliffs and large trees and snags (roost trees are often conifer snags 40-70 feet tall, often near feeding and nesting areas). Condors may remain at the roost site until midmorning, and generally return in mid- to late afternoon.

Most foraging occurs in open terrain of foothills, grasslands, potreros with chaparral areas, or oak savannah habitats. Historically, foraging also occurred on beaches and large rivers along the Pacific coast. Water is required for drinking and bathing.

California condors typically breed every other year, but can breed annually if they are not caring for dependent young. California condors usually lay a single egg between late January and early
April. The egg is incubated by both parents and hatches after approximately 56 days. Both parents share responsibilities for feeding the nestling. Feeding usually occurs daily for the first 2 months, then gradually diminishes in frequency. Juvenile condors leave the nest at 2-3 months of age, but remain in the vicinity of the nest and under their parents' care for up to a year. The California condor is non-migratory. California condors are capable of extended flights (more than 100 miles in a day).

California condors are opportunistic scavengers, feeding exclusively on the carcasses of dead animals. Typical foraging behavior includes long-distance reconnaissance flights, lengthy circling flights over a carcass, and hours of waiting at a roost or on the ground near a carcass. California condors locate food by visual rather than olfactory cues, and require fairly open areas for feeding, allowing ease in approaching and leaving a carcass. California condors typically feed only 1-3 days per week.

Seasonal foraging behavior shifts may be the result of climatic cycles or changes in food availability. California condors maintain wide-ranging foraging patterns (i.e., at least 2.8 to 11.6 square miles) throughout the year, an important strategy for a species that may be subjected to unpredictable food supplies.

Historically, condors probably fed on mule deer (*Odocoileus hemionus*), elk (*Cervus elaphus*), pronghorn antelope (*Antilocarpa americana*), and various marine mammals. More recently, domestic livestock made up the majority of their diet. (Source: USFS 2006 Forest Plan Species Account)

**Population Status and Threats – California Condor:** The California condor has been one of the most highly endangered bird species in the world throughout its modern history. As the result of an aggressive management program, including capture of the last six individuals remaining in the wild in 1986-87, captive breeding, and reintroduction of captive progeny, the total population continues to increase from the low point in 1982-82, when only 21-22 individuals were thought to survive. The 9/30/12 California condor status report by the U.S. Fish and Wildlife Service showed a total population of 410 individuals, including 180 in captivity and 230 in the wild.

A high number of birds are still being lost to poisoning from lead ingested from carcasses, and this factor may preclude rapid recovery of the species in some areas. The ingestion of trash items, including glass fragments, china, plastic, and metal bottle tops, and non-digestible natural items such as small rocks, sticks, grass, wool, and fur, is a serious problem for condor chicks in California nests. (http://globalraptors.org/grin/SpeciesResults.asp?specID=8258)

Factors that led to California condor's century-long decline included illegal collection of adults and their eggs; poisoning by substances used to eradicate livestock predators; poisoning from ingestion of lead fragments of bullets embedded in animal carcasses; other forms of poisoning (DDT, cyanide, strychnine, compound 1080, antifreeze from car radiators); shooting; and collisions with structures such as transmission lines. In addition, the roads, cities, housing tracts, and weekend mountain retreats of modern civilization have replaced much of the open country condors need to find food. Their slow rate of reproduction and maturation undoubtedly make the California condor population as a whole more vulnerable to these threats.
Viability is a definite concern due to the extremely small population and vulnerability to many factors. Greatest among these are shooting, lead contamination, collision with overhead transmission lines and towers, trash, and general human disturbance (USFS 2006 Forest Plan Species Account).

Rideout et al. (2012) documented the causes of death of free-ranging California condors between 1992 (the beginning of the reintroduction program) through 2009. Out of 76 dead condors for which the cause of death could be determined, 70% were from anthropogenic causes. Ingestion of trash was the most important cause of death for nestlings, and lead toxicosis was the most important factor for juveniles and adults. Other causes of death identified included: copper toxicosis (possibly from cattle troughs treated with copper sulfate to control algae), west Nile virus, powerline electrocution, powerline collision, ethylene glycol (antifreeze) ingestion, rattlesnake bite, predation, and gunshot. Deaths from mining-associated activities were not documented in that study.

There are many existing and ongoing threats to California condors, as described above. The risk to condors from man-made factors (trash, toxins, shooting, electrocution, and collisions) will continue and may increase in the foreseeable future as human populations in southern California grow.

Perhaps the greatest threat to condors in the foreseeable future is the expansion of renewable energy developments (solar and wind) throughout the condor range as well as in areas where condors are expected to expand as the population continues to grow. The Bureau of Land Management has seen a surge in wind energy applications. Their website has data tables and maps displaying areas with existing applications for renewable energy projects (http://www.blm.gov/ca/st/en/prog/energy/wind.html).

Occurrence on the North Slope – California Condor: California condors have been observed at several locations in the San Bernardino Mountains since 2002, including the White Mountain area of the North Slope (sighting of two condors). USFWS records of radio-tagged condors suggest that as S. California’s condor population continues to grow, the areas they cover is expanding (G. Hund, pers. comm. 2013). Condors appear to be traveling long distances from the main population sites on the coast on a more frequent basis.

Currently, condors do not regularly forage over the San Bernardino Mountains and no nesting is known. The closest nest are approximately 120 miles away and the closest historic nest record was approximately 75 miles away (J. Brandt, pers. comm. 2014). Foraging likely occurs on an occasional basis and may increase in frequency as the population expands and if closer nest sites are established. The cave nesting structures that condors prefer are not present within the federal action area; however, there are likely a few suitable nesting structures on the North Slope. If condors chose to closer to the North Slope, foraging likelihood on the North Slope would increase.

Take for California Condor: The Endangered Species Act of 1973, as amended, makes it unlawful for a person to “take” a listed animal without a permit. Under the federal act, take is
defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct” (16 U.S.C. §1532(a)). Under federal regulations, the term “harm” is defined as “an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering” (50 C.F.R. § 17.3).

There are currently no California condor nests currently known from the North Slope. Take and disturbance to nesting California condors are considered very unlikely but the likelihood could change should nesting occur in the future. The RCS contains provisions for annual monitoring and nest monitoring and for actions if an active condor nest were found in close proximity to active mining operations.

c) American Peregrine Falcon (*Falco peregrines anatus*)
The peregrine falcon is a Forest Service Sensitive species and a CDFW “fully protected” species. It is a USFWS Bird of Conservation Concern. It has been removed from the Federal and State of California’s Endangered Species lists.

**Life History and Baseline Information – Peregrine Falcon:** Peregrine falcons nest almost exclusively on protected ledges of high cliffs, primarily in woodland, forest, and coastal habitats. A very small number of nests have been found on small outcrops and in trees, and a number of reintroduced pairs nest on tall buildings. Cliffs that provide ledges, potholes, or small caves (usually with an overhang), and that are relatively inaccessible to mammalian predators, are required components of nesting habitat. Nest sites usually provide a panoramic view of open country, are near water, and are associated with a local abundance of passerine, waterfowl, or shorebird prey.

The breeding season of peregrine falcon generally begins after the winter solstice and can last until August. Courtship typically involves the male provisioning the female with food. Females normally lay two-four eggs; egg-laying in California typically occurs in March-May. Both male and female incubate the eggs for 29–33 days. In California, fledging occurs in May to July when the young are 35–54 days old. Juvenile peregrine falcons begin hunting on their own and become independent 6–15 weeks after fledging.

Peregrine falcons feed almost exclusively on birds; ranging in size from hummingbirds to Aleutian Canada geese. They typically feed on highly mobile, flocking, and colonial nesting birds, such as shorebirds, waterfowl, doves, and pigeons. Peregrine falcons chase and grab their prey, or dive down on them at speeds up to 100–200 miles per hour (i.e., stooping). During the stoop, a peregrine falcon grasps its prey or strikes it with its talons and subsequently retrieves it on the ground. Peregrine falcons hunt during the day or at dusk. During the breeding season, adult peregrine falcons attack and chase other raptors away from the nest, especially golden eagles and other peregrine falcons that move through their territory. Adults hunt over a large area around the nest site; foraging may occur up to 12 miles from the nest.

**Population Status and Threats – Peregrine Falcon:** Bans on the use of DDT in the 1970s and a major reintroduction program led by the CDFW and Santa Cruz Predatory Bird Research Group.
(SCPBRG) in California have resulted in an impressive increase in the distribution and abundance of this species over the last 30 years. The population increase has been substantial enough to warrant the taxon's delisting, in August 1999, from federal endangered status. (Source: USFS 2006 Forest Plan Species Accounts, Pagel 2014 pers. comm.)

The widespread use of DDT was a primary cause of the decline in peregrine falcon populations. High levels of these pesticides and their metabolites (i.e., byproducts of organic decompositions) were found in the tissues of peregrine falcons, leading to thin eggshells and reproductive failure. Environmental toxins continue to be a threat. Other threats include illegal shooting, illegal falconry activities, and habitat destruction. National Forest System lands in southern California do not support a large amount of high-quality habitat for American peregrine falcon. Protecting cliff-nesting sites from human disturbance has been identified as an important conservation measure for peregrine falcons on NFS lands. (Source: USFS 2006 Forest Plan Species Accounts, Pagel and Jarman 1991)

Occurrence on the North Slope – Peregrine Falcon: Peregrine falcons are not currently known to nest on the North Slope. However, the number of peregrine falcon nesting territories and distribution of them in the areas in and near the San Bernardino Mountains have increased over the past decade. After decades of no nesting in the San Bernardino Mountains or eastern San Gabriel Mountains, now at least one nest is known in each area.

The North Slope has an abundance of rocky outcrops and cliffs that are suitable peregrine falcon nest sites. With successful nesting efforts throughout its range in S. California and elsewhere, it is possible that over the life of current and future mining projects, this species could nest on the North Slope of the San Bernardino Mountains.

d) Prairie Falcon (Falco mexicanus)
Prairie falcons are a SBNF Watchlist species and a CDFW Watchlist species.

Life History and Baseline Information – Prairie Falcon: Prairie falcons inhabit shrub-steppe desert, open desert scrub, grassland, mixed shrub-grasslands, and alpine tundra. Prairie falcon habitat typically consists of dry open terrain, either hilly or level. Nests are located on cliffs, generally in arid open areas. Desert scrub and grasslands are preferred foraging habitats in southern California. This species has declined in the coastal foothills of southern California as development has affected foraging habitat availability.

The breeding season of prairie falcons generally begins after the winter solstice and can last until August. Egg-laying typically occurs in March – May with fledging between May and July. Nests are located on cliff ledges or rock outcrops in open regions. Nests are typically scrapes located 30-40 feet high on a cliff or rock outcrop; they are occasionally found as high as 400 feet. Abandoned nests built by other birds are rarely used by prairie falcons. The female incubates a single clutch; clutches usually contain four-five eggs. Incubation lasts for approximately 29-31 days.

Prairie falcons are described as more of a wanderer than a true migrant. They move seasonally, probably in response to food availability. Most of the species' southward movements occur.
between late August and late October, with the main return flight taking place in early March to late April.

Primary foods taken by prairie falcons include horned larks (*Eremophila alpestris*) and other small passerines, lizards, ground squirrels (*Spermophilus* spp.), and small rodents. Prairie falcons employ two main hunting strategies: one is to flush a prey item and fly along a route meant to conceal the prairie falcon until the last moment; the other is to patrol long distances close to the ground until it may surprise its quarry. Prairie falcons defend a small area around the nest site from conspecific and other intruders. However, prairie falcons forage over large, undefended areas. (Source: USFS 2006 Forest Plan Species Account, Pagel 2014 pers. comm.)

**Population Status and Threats – Prairie Falcon:** The species is legally harvested in 19 states. Falconers legally take an estimated 0.2 percent of the prairie falcon population each year, making it the second most commonly harvested raptor in the United States. Because of prairie falcons' strong association with cliffs as nesting sites, they are especially susceptible to habitat loss adjacent to suitable nest structures. Prairie falcons can be adversely affected by large-scale agricultural development, especially in foraging areas with high densities of ground squirrels. Much of the prime foraging area for prairie falcons has been lost to in southern California and those losses are likely to continue with human population growth. (Source: USFS 2006 Forest Plan Species Account)

**Occurrence on North Slope – Prairie Falcon:** Prairie falcons are known to occur on the North Slope and adjacent SBNF lands. There is a migrant prairie falcon record at Cushenbury Spring (Kielhold 1993). There are several records on the North Slope (SBNF records). Two of the records are of single birds between March and July. It is not known if they were migratory or breeding birds. This species was also detected at the Mitsubishi mining area in May 2008 (MacKay and Thomas 2008). Suitable habitat exists for foraging and nesting exists on the North Slope. Nesting is suspected but has not been confirmed.

**RAPTOR MANAGEMENT**
The intent of the management actions described here is to lower the risk to special status raptors as a result of mining operations through monitoring and management activities coordinated among public agencies and mining operators that have activities on National Forest System lands on the North Slope. They are intended to provide for equity and consistency between the North Slope mine operators conducting activities on the North Slope and limit the potential for loss/degradation of nesting special status raptor habitat or disturbance that could harm, harass, or result in mortality of these species. The management actions are also intended to provide a method to identify and resolve conflicts and assess trade-offs, should they arise.

These measures have been developed in conjunction with USFWS, CDFW, and the USFS.

**RAPTOR MANAGEMENT MEASURES**
The following Raptor Management measures will be used by the mining companies authorized to operate on National Forest lands on the North Slope of the San Bernardino Mountains. The SBNF will also participate, and will contribute subject to availability of staff and appropriated funds.
1. **Annual Monitoring of Nest Sites**

*Monitoring Objectives:* The monitoring objectives are to: a) gather baseline population data; b) identify occupied territories, inactive nests, and likely nest sites; c) determine occupancy and productivity of all known raptor nests; d) conduct reconnaissance to find new nest sites; e) allow for detection of trends over time; and, f) ascertain a robust database of nesting chronology (courtship, laying/brooding, hatching, fledging). Annual monitoring of raptor nest sites on the North Slope is necessary to determine which special status raptor nesting territories are active in any given year and where they are located relative to the active mining operation areas. At the outset of the RCS, annual monitoring will focus on known and potential golden eagle nesting territories. Over the life of the RCS, species priorities may be shifted depending on new information about each special status raptor species.

*Monitoring Protocol/Methodology:* Methodology will follow established protocols. Golden eagle reconnaissance and monitoring shall follow USFWS Interim Guidelines (Appendix A) and any future revisions to these guidelines. Surveys for other raptors, should they become recognized as RCS priorities, will follow currently-applicable USFWS protocols or accepted survey standards (*Pagel 1991* for peregrine falcons). Where protocols do not exist, the survey techniques will be approved by the USFS prior to any field work. In the future, survey methodologies should consider new survey technologies with lower likelihood of disturbing both bighorn sheep and nesting raptors.

Because of the disturbance potential for bighorn sheep, helicopter reconnaissance and monitoring will be avoided and monitoring efforts will be ground-based. Exceptions for helicopter use will be considered based on approval from CDFW and USFWS.

Monitoring for golden eagles will start at the beginning of the courtship period (predicted for the survey area to be early to mid-January), to ensure detection of nesting attempts and abandonment. As nest occupancy and phenology of nesting raptors on the North Slope becomes better understood, the timing of survey efforts may be adjusted.

*Survey Area:* The survey area for golden eagles will be used as the survey area for all special status raptors. For golden eagles, the USFWS’s guidelines include a standard survey area of ten miles from the activity for renewable energy projects. This is based on the maximum practicable distance that a golden eagle typically travels from the nest centroid for foraging. Based on knowledge of the proposed North Slope mining projects, the topography, and an understanding of golden eagle biology, the survey area for this area has been modified to include suitable nest sites within roughly 5 miles east-west of the mining operations. The survey polygon includes the North Slope area from near Terrace Springs west to Grapevine Canyon near White Mountain, from the toe of the slope to slightly south of the ridgeline (Figure 2).

Monitoring will be focused on the previously-identified nesting territories in the survey area and would also evaluate suitable nesting habitat within the polygon to detect new or altered raptor territories.
The Forest Service has consolidated existing data and created a map of three nesting territories on and near the North Slope within the mining area. Each of these territories has several nest structures that have been identified in previous survey efforts.

The first year of monitoring would involve surveying known nesting territories and suitable nesting habitat within the survey polygon to find any previously-undetected nest structures, validating the existing data and nest locations, and monitoring the identified territories for nesting activities (occupancy and reproductive success) in the first breeding season.

Monitoring in subsequent years would focus on the known nesting territories within the survey area and not require complete re-surveys of the entire survey area. It is expected any new nesting territories and presence of “floater” golden eagles would be detected during the monitoring of known nesting territories.

**Monitoring Frequency and Duration:** Monitoring of known nest sites will be conducted annually. These survey requirements would continue for the duration of active and future mining operations. After 5 years of monitoring and data gathering to establish baseline conditions, a reduction of the survey frequency will be evaluated.

**Target Species:** At the time of development of the RCS, the special status raptors being addressed are golden eagle, California condor, peregrine falcon, and prairie falcon. During annual surveys, observations of all of these species will be noted. If nesting or presence is suspected for California condors or peregrine falcons, nest surveys will be conducted. Prairie falcons are currently excluded from nesting surveys because the population status appears to be stable. In the future, target raptor species may change as populations decline or recover.

**Notifications and Reporting:** Newly-discovered nest structures and/or evidence of an occupied nest territory detected during monitoring will be reported to the Forest Service biologist via email within 48 hours of detection. Brief weekly summaries of monitoring results will also be provided to the Forest Service via email. The Forest Service will coordinate appropriate notification, as necessary, with USFWS or CDFW.

**Surveyor Qualifications:** Monitoring will be conducted by qualified biologists, who have verifiable prior experience, are directly knowledgeable of the species and the survey protocols, and who are approved by the Forest Service. Resumes will be submitted to the Forest Service for approval prior to hiring/contracting.

2. **Monitoring for Behavioral Responses to Mining Activities**

Behavioral response monitoring efforts will focus on golden eagles. If nesting of California condors or peregrine falcons is detected, the monitoring would be expanded to include them. Prairie falcon nests would not be monitored (unless nest monitoring for one of the other species is occurring in the same area and the prairie falcon nest could be monitored efficiently). Over the life of the RCS, target species may be added or removed depending on population status concerns.
If an active raptor nest is located within 1.5-miles of an active blasting site, site-specific nest monitoring during the important phases (e.g., egg-laying, incubation/early nestling, mid-nestling, and late nestling) of the breeding season will be conducted to assess behavioral responses and effects to nesting success. Exceptions will be considered where geographic or topographic features or blast techniques result in noise attenuation to the point that behavioral responses are not observed, or not expected to be observed.

Monitoring will be focused on detecting responses during a sampling of blast types and sizes spread out during the important phases of the nesting season (described above). Monitoring parameters will be developed by U.S. Fish and Wildlife Service in coordination with SBNF and CDFW based on site-specific and species-specific considerations, and the blast types and sizes that the companies expect to detonate. Data collected will include factors to differentiate between natural behavior unrelated to blasting and varying behavioral responses to different blast techniques or conditions (e.g., type of disturbance/activity, distance to blast, type of blast, size of blasts, decibel levels, weather conditions, etc.) with pre- and post-blast monitoring.

In most situations, golden eagles appear to be sensitive to anthropogenic disturbance. As such, there is greater potential for disturbance at distance away from the nest site. The data from those monitoring efforts and disturbance responses will be used to evaluate and develop appropriate management tools (e.g., blasting techniques, noise and seismic attenuators, timing of blasting, etc.).

The behavioral response data would also be used to refine the need and guidelines for future monitoring. After enough behavioral response data have been gathered to understand sensitivity of the species to various types of mining activities, the monitoring requirements will be adjusted (e.g., reduce the distance that triggers monitoring) or ceased. The objective is to use a few years of monitoring data to identify any significant behavioral responses, establish management practices as needed, and shift out of monitoring.

Notifications and Reporting: Brief weekly summaries of monitoring results will also be provided to the Forest Service via email. The Forest Service will coordinate appropriate notification, as necessary, with USFWS or CDFW.

3. Coordination
The SBNF will work with other agencies (e.g., USFWS, CDFW, BLM, etc.), entities (e.g., private companies, researchers, etc.), and contractors to minimize redundancy in survey efforts and share data, where appropriate and feasible.

If an occupied nest for a federally-protected species, a California-listed species, or a California fully-protected species is found within 1.5 miles of an active quarry operation, the SBNF will determine if additional monitoring is needed and undertake the appropriate coordination/consultation with the appropriate agencies. If required, the appropriate permit(s) will be requested from USFWS or CDFW, under the applicable law (federal or state Endangered Species Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act).
The mines will cooperate in such efforts and implement the resulting measures designed to minimize or avoid “take.”

**STANDARD DESIGN FEATURES FOR MINING AND OTHER PROJECTS ON THE NORTH SLOPE**

**General**


DF-2. Disturbance footprints for mine operations and development of new quarries and roads shall be limited to the greatest extent possible to the goal of minimizing impacts to adjacent habitat and sensitive biological resources.

DF-3. If wetting or soil bonding agents used for dust control appear to be attracting wildlife to the roadways (e.g., by pooling or creating mineral licks), the mining operator will work with the Forest Service to develop remedies.

DF-4. All vehicles and equipment shall be maintained in proper working condition to minimize the potential for spill of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Spills will be cleaned up as quickly as possible.

DF-5. Mine operators will maintain facilities and grounds in a manner that minimizes any potential impacts to raptors, predators, and scavengers (e.g., minimize storing materials that may attract prey species, remove trash/garbage daily, etc.). All trash and food-related waste shall be secured in self-closing animal-proof containers and removed daily from mining areas and roads.

DF-6. No recreational target shooting will occur on NFS lands.

DF-7. The mine operators shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will address raptor nest awareness. This will include the importance of avoiding harassment/disturbance, adherence to speed limits, adherence to defined project boundaries, reporting guidelines, etc. The mine operators will solicit input from CDFW and USFS in developing the training program.

DF-8. The mine operators will avoid practices (e.g., bird feeders, open trash cans, landscape plants that produce fruit, litter, etc.) that attract/enhance prey populations and opportunities for raptor hunting or scavenging near active quarries, haul roads, and processing areas. This would also help discourage the spread of non-native birds; to discourage the spread of disease and pathogens, etc.

DF-9. To reduce vehicle collision risk to raptors and other scavengers, intact animal carcasses (with the exception of bighorn sheep and deer) will be removed immediately from mine roads and mining areas. Carcasses will be moved far enough away from roads and active mining areas that scavengers would not be in danger of vehicle collision or other mining-related hazards. Bighorn sheep and deer carcasses shall be covered with a tarp and left in
place until the CDFW or Forest Service biologist is notified and provides direction. As much as is feasible, care will be taken to avoid disturbing the area around the carcass to preserve predator tracks, parasites, etc.

Reclamation

The timing and planning of reclamation measures at sites away from active quarries, haul roads, and processing areas will consider improving or creating suitable foraging and nesting habitat for raptors. These measures may include:

RE-1. Phase reclamation where possible to re-establish suitable habitat for prey species in areas where mining activities have ceased.

RE-2. Where perch structures are lacking, consider construction/installation of artificial structures (e.g., poles, rock piles, etc.) to enhance perching, roosting, and foraging habitat on a case-by-case basis.

RE-3. Restrict vehicle use and human activity to the extent possible in reclamation and reclaimed areas. Remove and reclaim roads where possible.

RE-4. Revegetate with local native plant species that are favorable for raptor prey species.

RE-5. During reclamation, create suitable cover for raptor prey species by considering spatial features on the landscape. Planting in groupings and mosaics and construction of brush and rock piles should be considered.

RE-6. If natural water sources are lacking in reclamation areas, evaluate the feasibility of artificial water sources (wildlife drinkers, guzzlers, catchment structures, etc.) during the reclamation period.

POSSIBLE PROTECTION MEASURES BASED ON NEED AS DETERMINED BY MONITORING RESULTS

Because this RCS is viewed as a long-term management strategy with the expectation that the mining operations may exist a century or more after approval, these measures are viewed as a tentative toolbox of possible approaches. Depending on site-specific conditions, one or more of these measures may be appropriate. Alternatively, development of new measures may be more appropriate, especially in response to changes in mining technology, changes in wildlife monitoring/management techniques, and based on a better understanding of the ecology of North Slope raptors.

PM-1. Where nest monitoring detects changes in behavior of nesting raptors that can be attributed to blasting activities, use of noise attenuation devices, species-specific Limited Operating Periods (LOPs), or alternative mining techniques will be considered for use during the breeding season. The objective is to conduct blasting while minimizing changes in nesting behavior that would be considered “take,” where feasible. See “Behavioral Response Monitoring” above for additional discussion.
PM-2. If suitable nesting habitat is degraded to the point that suitable nest sites are a limiting factor, consider construction of artificial nest platforms at suitable sites away from disturbance sources.

PM-3. Consider incorporating the creation of nest ledges (for golden eagles, etc.) or cave-like structures (for California condors) on quarry benches into ongoing and future quarry reclamation. Biologists from Forest Service, USFWS, and CDFW would provide input on optimal characteristics for these features.
References Cited


**Personal Communications**


Personal communication with Robin Eliason (email, conversations, and review of the 
golden eagle portions of this document).

**Guidance Documents**
Interaction Committee. 227 pp. 


Based Wind Energy (Version 2). U.S. Fish and Wildlife Service, Division of Migratory 

**Websites with Draft Conservation Plan Guidance:**
http://www.fws.gov/windenergy/docs/ECP_draft_guidance_2_10_final_clean_omb.pdf

There are a number of example “Bird and Bat Conservation Strategies” on-line that have been 
developed for renewable energy projects. Some examples:

- Energy.gov
- Centinelasolar.com
- Minnesota State Conservation Strategies
- http://www.aplic.org/APPs.php
Appendix A: Golden Eagle Monitoring Guideline Summary

Golden eagle reconnaissance and monitoring shall follow USFWS Interim Guidelines (Pagel et al. 2010 – Interim Golden Eagle Technical Guidance: Inventory and Monitoring Protocols; and Other Recommendations in Support of Golden Eagle Management and Permit Issuance, USFWS Division of Migratory Birds, Washington, DC) and any future revisions to these guidelines or a currently-applicable standardized federal guidance. Monitoring for other raptors will follow currently-applicable USFWS protocols or accepted survey standards.

The ground observation survey guidelines for golden eagles are summarized here (see Pagel et al. 2010 for complete guidelines):

- Observation posts for monitoring known territories will be no closer than 300 meters for extended observations, and generally no further than 700 meters, where terrain allows. Maximum observation post distance would be 1600 meters.

- To inventory and determine occupancy of cliff systems, there will be at least 2 observation periods per season. To determine fledging success, additional observations may (or may not) be necessary. Territory occupancy can be confirmed.
  - Observation periods will last at least 4 hours for known nest sites, or until territory occupancy can be confirmed.
  - Observation periods will last for at least 4 hours per 1.6 km of cliff system, based from the center point of that cliff complex.
  - Observation periods will be at least 30 days apart for monitoring efforts.

- To collect monitoring data at a known nest territory, there will be at least 2 observation periods per season.
  - Observation periods from ground observation points will last at least 4 hours for known nest sites or until nesting chronology can be confirmed per visit.
  - Observation periods will be at least 30 days apart.
Appendix D: North Slope San Bernardino Mountains Bighorn Sheep Conservation Strategy
(California Department of Fish and Wildlife, October 2019)
NORTH SLOPE SAN BERNARDINO MOUNTAINS
BIGHORN SHEEP CONSERVATION STRATEGY

Prepared by: Jeff Villepique (California Department of Fish and Wildlife) and Robin Eliason, (Mountaintop District, San Bernardino National Forest). Input from Omya, Inc. and Mitsubishi Cement Corporation.

October 25, 2019
NORTH SLOPE BIGHORN SHEEP CONSERVATION STRATEGY

INTRODUCTION

Strategy: The California Department of Fish and Wildlife (CDFW) and the San Bernardino National Forest (SBNF) have developed the North Slope Bighorn Sheep Conservation Strategy (BHSCS) to guide both wildlife managers and mining interests within the North Slope Bighorn Sheep Conservation Area (Figure 1), which overlaps existing mining operations by Mitsubishi, Omya, and Specialty Minerals (together “mines”). The overarching goal of this cooperative effort is to maintain a healthy population of desert bighorn sheep (*Ovis canadensis nelsoni*) on currently occupied and potential habitat, on the north-facing escarpment of San Bernardino Mountains, while allowing economic activities by mines. Bighorn sheep currently occupying the central area of the North Slope Bighorn Sheep Conservation Area are referred to as the “Cushenbury population,” named for Cushenbury Canyon, the general area where desert bighorn sheep were first noted.

The objective of the BHSCS is to provide consistent guidance and tools for management across the affected mines on the North Slope. Omya and Mitsubishi have provided input to the development and finalization of the BHSCS and have agreed to follow the guidelines put forth in this effort. The BHSCS has been tailored to guide actions and minimize potential impacts associated with mining activities, and is a cooperative effort between the CDFW, SBNF, and North Slope mining companies Omya and Mitsubishi. The BHSCS will be supported by a non-wasting endowment established through voluntary contributions by Omya and Mitsubishi to a qualified* third-party trustee of mutual agreement during calendar year 2020.

The BHSCS is expected to be a dynamic document, updated as new information and scientific understanding of the North Slope bighorn sheep population and its relationship to habitat become available. The strategy includes monitoring objectives, as well as measures to evaluate, minimize, rectify, and reduce (or eliminate over time) effects to bighorn sheep in the North Slope from mining and National Forest System (NFS) land and resource management activities. The intent is to use systematic monitoring of the North Slope bighorn sheep population’s numbers, behavior, habitat selection, and reproductive chronology and success, to develop and refine site- and activity-specific measures to ensure a viable population and provide for adaptive management opportunities.

Due to the long life of the mining projects and potential for new technologies (both in monitoring and mining), and the uncertainty of long-term environmental and population trends, the BHSCS will be reviewed every five years and updated as determined necessary by CDFW, or parties of the BHSCS (Omya, Mitsubishi, Specialty Minerals, CDFW, and SBNF). If future changes to the BHSCS result in substantial changes to industry obligations, mining company concurrence is needed, and a modified BHSCS may be required.

* https://www.wildlife.ca.gov/Conservation/Planning/Endowments
The intent of the BHSCS is to:

- Describe an adaptive management approach that provides protection of this herd of bighorn sheep while continuing the mining operations and other activities. The purpose of adaptive management is to improve long-term management outcomes by recognizing where key uncertainties impede decision-making, seeking to reduce those uncertainties over time, and applying that learning to subsequent decisions (Walters 1986). The goal is to reduce uncertainty for mining operators and for bighorn sheep management.
- Provide continuity and a unified approach for managing bighorn sheep and their habitat on the North Slope for the mine operators in the area. By taking this approach, the parties may combine efforts, reducing costs and redundancy.

For the purposes of this BHSCS, the North Slope of the San Bernardino Mountains is described as the steep north-facing slope that rises from the Mojave Desert floor to the top of the ridge, from approximately Grapevine Canyon road on the west to the Granite Peaks on the east (Figure 1).
BACKGROUND (Parts excerpted, for consistency, from DEIR ‘Biological Resources’)
The North Slope’s rugged terrain rises from the Mojave Desert floor. The steep slopes have an abundance of steep terrain, rocky pinnacles, outcrops, rock crevice formations, rock ledges, and cliffs. Those areas provide excellent habitat for desert bighorn sheep. Bighorn sheep selected habitat on the North Slope based on measures of topography, vegetation, fire history, proximity to water, and proximity to mine-related features (Bleich et al. 2009, Anderson et al. 2017). Potential habitat for bighorn sheep in the North Slope bighorn sheep conservation area (Figure 1), however, was defined only by topographic measures (Sappington et al. 2007), because other habitat features cannot be forecast into the future, given unpredictable changes to future climate (Polade et al. 2017) vegetation, wildfire, mining activity, or other human modifications. Consequently, the topographic delineation of the North Slope San Bernardino Mountains bighorn sheep conservation area includes potential habitat for bighorn sheep to the west and east of documented home ranges.

The vegetation on the North Slope includes 1) pinyon/juniper woodland and montane conifer forests at the rim; 2) a pinyon/juniper-desert transition zone that includes Joshua trees, pinyon pines, junipers, yuccas, and desert shrubs; and, 3) high desert vegetation at the base of the mountain slopes. The rugged terrain and deep canyons/drainages provide suitable habitat for bighorn sheep for browsing, escape, lambing, etc.

Desert Bighorn Sheep (Ovis canadensis nelsoni)
Desert bighorn sheep is a Bureau of Land Management (BLM) sensitive species, was identified by the Forest Service as a local viability concern species (Stephenson and Calcarone 1999), and is a SBNF Watchlist species. Desert bighorn sheep are considered a CDFW Fully-Protected mammal under section 4700 of the Fish and Game Code (FGC).

Life History and Baseline:  The following information draws from and updates the species account contained in the Forest Plan (USFS 2006). Desert bighorn sheep in the San Bernardino Mountains are considered to constitute two separate populations: the larger population (San Gorgonio Population) occurs in the vicinity of Mount San Gorgonio in the San Gorgonio Wilderness; the other population (Cushenbury Population) occurs on the northern edge of the range in desert-facing canyons (e.g., Furnace, Bousic, Arctic, and Marble Canyons). Desert bighorn sheep occur in isolated populations distributed among arid mountain ranges in the western U.S. and northern Mexico.

Escape terrain and sufficient forage and separation from domestic livestock are identified as the most important habitat components for desert bighorn sheep. Escape terrain is defined as steep slopes (80 percent or steeper) with abundant rock outcrops and sparse shrub cover (canopy cover of 30 percent or less). Desert bighorn sheep fitted with GPS collars in the San Gabriel Mountains occurred at elevations of 3,000–10,064 feet (i.e., to the summit of Mount San Antonio). During the winter and early spring, Desert bighorn sheep occur primarily in escarpment chaparral in the lower canyons at 3,000–6,000 feet.

The breeding season of Desert bighorn sheep exhibits substantial plasticity; young may be born as early as December 25 (observed in the San Gorgonio population) and as late as August (inferred from <2 month old lamb observed in the Cushenbury population in October; CDFW
records). Single lambs (and rarely twins) are born following a six-month gestation; however, the timing of breeding varies and is dependent on maternal condition. Such variation is most likely a response to variability in seasonal timing of precipitation, which affects the timing of peak nutrition in available forage species. Female body condition and ovulation, in turn, depend upon timing of peak nutrition.

Wide variation in timing of parturition has been demonstrated among Desert bighorn sheep populations. While the majority of lambing may occur in a particular 1–2 month span, lambs may be born far outside of those modal periods (Rubin et al. 2000). Over a four-year period in one Sonoran Desert population of desert bighorn sheep in California, lambing spanned 7 months (February through August; Rubin et al. 2000). Most models of future climate for southern California predict variation in timing and quantity of precipitation (Polade et al. 2017). The California droughts of 2011–2017, in conjunction with instances of above average summer precipitation could be a harbinger of future variability. Empirical observations and predicted climate variability support the potential presence of vulnerable neo-natal bighorn sheep lambs at almost any time of year.

During the first few weeks after giving birth, ewes remain alone with their lambs in steep terrain until they join a nursery group. Lambs are weaned at 3–6 months, and juveniles remain with the ewes through their first or second year. Rams may mature physiologically at 6 months of age, however, behavioral constraints preclude mating by juvenile males in the presence of dominant adult males. During the height of the breeding period, mature rams seemed to have little fear of humans and, in the San Gabriel Mountains, made movements of 6 or more miles in search of ewes (CDFW data).

From birth, ewes remain together in "ewe groups." Their gregarious and philopatric behavior limits their dispersal. Genetic data suggest that movement of ewes among populations, while rare, has occurred in the recent past. In contrast to the fidelity that young ewes exhibit toward their maternal ewe group, young rams generally leave the maternal group at about 2 years of age, joining other males during sexual segregation. Males and females often select different resources and home ranges throughout much of the year, aggregating through the mating period, but diverging for the majority of the year. This pattern of sexual segregation is well-established among dimorphic ungulates including Desert bighorn sheep, and researchers have suggested that habitat requirements for males and females may be so different that the sexes should be managed as though they are different species (Bleich et al. 1997).

Genetic and observational data suggest that ram movement among ewe groups is common. Young ewes learn the locations of resources, such as foraging areas, water sources, bedding/resting areas, etc. from their mothers and/or older females in a ewe group and demonstrate a high degree of philopatry to these traditional home ranges throughout their lives. Rams do not exhibit the same site fidelity as ewes and tend to move among ewe groups. Home ranges in one study were found to average 9.8 square miles and 7.8 square miles for rams and ewes, respectively.

Bighorn sheep in montane environments often migrate between winter and summer ranges, generally moving downslope in winter and spending summer in higher elevation habitats. The
Cushenbury bighorn sheep population inhabits a limited band of suitable habitat, lacking both the alpine habitat and lower-elevation range used by bighorn sheep in the San Gorgonio and San Gabriel bighorn sheep ranges. Data from GPS collars deployed in the Cushenbury populations demonstrate that bighorn sheep in the Cushenbury population, on average, occupied winter elevations (mean 5551 ft. m range 4364–8005 ft.) only 384 ft lower than those elevations used in summer (mean 5935 ft., range 4416–8032 ft.), whereas animals in the San Gabriel population exhibited twice the average seasonal change in elevation of 840 ft. (winter mean 6093 ft., range 3287–9144 ft.; summer mean 6936 ft., range 3199–9701 ft.; CDFW data).

Upper elevations used by bighorn sheep in the Cushenbury population are constrained by the transition to conifer forest, a cover type generally avoided by bighorn sheep, particularly females, on those north-facing slopes. The North Slope of the San Bernardino Mountains does not provide suitable high-elevation habitat for bighorn sheep lacking tree cover. A shift to higher elevations is predicted as a future response by bighorn sheep to habitat alternations expected under a warmer, more arid climate predicted under a majority of climate change scenarios (Epps et al. 2004). The relatively narrow elevation band occupied by the Cushenbury population and lack of high-elevation habitat may limit the resilience of the population to future changes. Water availability may also restrict movement of bighorn sheep during hot summer months.

In general, bighorn sheep feed in the early morning, at midday, and in the evening, lying down and chewing their cud at other times, and bedding down for the evening. Foraging and bedding spots may be used for years. Daily foraging and resting cycles also vary depending on forage quality. Seasonal activity depends on availability of water, forage, and escape terrain. Typically, bighorn sheep congregate near dependable water sources from May through October, when temperatures are highest. This aggregation of individuals also corresponds with breeding activities. Young bighorn sheep learn locations of escape terrain, water sources, and lambing habitat from older individuals in the group.

Until the mid-1990s, there were no documented observations of bighorn sheep in the areas between the Cushenbury and San Gorgonio Populations. In the past, all of the North Slope sightings were to the west of Highway 18, although suitable habitat may exist to the east. It was suspected that Arrastre Creek's steep slopes might provide a travel corridor and link between the two populations. A sighting of a ram crossing Forest Road 2N02 near Arrastre Creek in the early 2000s and a skull in Round Valley in 2003 may confirm that linkage. It is not known, however, if these anecdotal reports reflect rare movements by males during the rut, or indicate contiguous habitat sufficient to allow movement by females among the North Slope and the San Gorgonio populations. These records may not provide evidence of immigration/emigration; they may have simply been exploratory moves that did not result in mixing of the populations. Although the Granite Peaks of the San Bernardino Mountains may provide suitable habitat, there are no records of bighorn sheep in that area.

The following additional information was derived from a Forest Service records, personal observations and communications, and literature, as cited. The first Forest Service records for bighorn sheep on the North Slope were from May 1975 when personnel from Specialty Minerals Incorporated (formerly Pfizer, Inc.) observed three ewes in Furnace Canyon and using Netthill spring area (Anderson 2018). In 1990, the Forest Service received information of an older
sighting from October 1948 when a pair of hunters in upper Arctic Canyon observed six bighorn sheep. At the time, that was reported to be “the most bighorn sheep seen at one time on the North Slope” (Anderson 2018).

It is believed that subsistence miners and squatters residing in the north-facing canyons in the 1960s and 1970s regularly poached deer and bighorn sheep, potentially limiting the bighorn sheep population size in the area. By the 1980s, the expansion of the limestone mining operations resulted in large areas of the North Slope being blocked off and becoming inaccessible to the general public. During that time, the Forest Service was also actively discouraging squatting on NFS lands and they were essentially gone by the 1980s (Forest Service records.). There is speculation that after that occurred, the North Slope bighorn sheep population was able to expand. By the early 1990s, small groups of bighorn sheep were regularly observed at all three of the large limestone mining operations and the population size was thought to be perhaps 40–50 animals (CDFW data).

The Cushenbury bighorn sheep population is likely limited by a carrying capacity of some 50 animals, the largest number thought to have been present at any time (1970s; CDFW data). While data unequivocally validating a carrying capacity of 50, or fewer, animals are lacking (e.g., recruitment rates), limited resources were suggested by documentation (in the 1990s) of prominent “browse lines” on shrubs used as forage by bighorn sheep, suggesting forage limitation (S. Torres, CDFW, personal communication with J. Villepique). Body condition scores from captures in multiple years averaged 2.8, on a scale of 1-5, wherein 1 implies severe forage limitation, and 5 indicates healthy fat reserves (CDFW data). The home range of the Cushenbury population is approximately 34 km² (95% composite kernel home range 1995–2003, 2006–2010; CDFW data), comparable to the area occupied by a single sub-group in other Transverse Range populations (e.g., the South Fork of Lytle Cr.), where the environment is less arid, with greater productivity.

Management for the long-term viability of the Cushenbury population must be based on a cautionary estimate of an upper bound for numbers of animals that the habitat may sustain. Available information supports 50 as a reasonable estimate of carrying capacity. Berger (1990) demonstrated empirically that bighorn sheep populations under 50 animals were not viable over a 50-year period. Because the Cushenbury population of bighorn sheep is likely limited by habitat to a small population (<50) having a high probability of local extinction, a probability which is inversely proportional to numbers of animals, losses of habitat are likely to reduce the probability of long-term viability.

Major threats to the Cushenbury population in the San Bernardino Mountains are disease transmission from domestic sheep and goats; predation by feral dogs and mountain lions; collisions with vehicles on State Route 18; potential death from ingesting balloons; habitat loss and fragmentation from large scale open pit mining operations; potentially reduced survival due to Psoroptes sp. mite infections; and, effects of drought and wildfire on habitat quality and availability. Unlike fire-adapted chaparral habitats of the San Gabriel Mountains, desert transition habitat in the Cushenbury bighorn sheep population may be negatively affected by wildfire. Bleich et al. (2009) determined that bighorn sheep in the Cushenbury population avoided recently burned areas, and those authors attributed differences in response by bighorn sheep to fire may to differences in precipitation between sheep populations.
Until 2007, the Cushenbury population was thought to number in the 30s (SBNF records). In October 2007, a herd of domestic sheep and goats was discovered at the top of Crystal Creek by USFS fire personnel mopping up “hot spots” from the Butler II wildfire (Bleich 2015). Those domestic animals apparently were released by their owner at the base of Crystal Creek, when the owner evacuated the fire, approximately three weeks earlier. Domestic sheep and goats were observed in the vicinity of the old Butterfield quarry and near the communications repeater a full four weeks after the start of the Butler II fire and were likely present in bighorn sheep habitat for one month. A group of 17 uncollared bighorn sheep of mixed sex and age classes had been observed in this area immediately prior to the start of the Butler II fire (CDFW data).

Following this proximate occurrence of domestic sheep and goats, bighorn sheep were not observed in the western portion of the range from 2008 to 2012. All indications are that only a small group of 10–15 bighorn sheep persisted in the Cushenbury range, occupying its east end (primarily east of Marble Canyon), while the western group of bighorn is presumed to have died from diseases transmitted from the domestic sheep and goats. Mass die-offs caused by disease transmission occur regularly in bighorn sheep and are a predictable outcome of contact between domestic and wild sheep.

In fall 2012, several ewes and a young ram were again observed and photographed in the western portion of the range at the OMYA mine. Their composition (including collared animals) was consistent with the movement of animals from the remnant group in the east end of the range, not a reappearance of long-missing bighorn sheep (CDFW data).

The second-most frequent cause of mortality (after the inferred transmission of disease from domestics) is mountain lion predation. CDFW began limited captures of bighorn sheep and fitted radio-collars to three bighorn sheep in 1995 and monitoring movement and survival using radio telemetry. Twelve of 24 (50%) of radio-collared bighorn sheep monitored by CDFW between 1995 and 2010, whose cause of mortality was investigated, are known to have been killed by mountain lions. An additional 7 mortalities were investigated and deemed likely to have been killed by mountain lions (with some uncertainty, e.g., feeding sign was evident but cause of mortality could not be established unequivocally). Together, 79% of investigated mortalities are attributed to likely mountain lion predation. Sustained high levels of predation by mountain lions may have implications for long-term viability of bighorn sheep populations (Hayes et al. 2000).

In 5 of 9 (55%) of mortalities of North Slope bighorn sheep investigated in 2007–2009, numerous latex balloons and attached ribbons were discovered in the rumen. All five animals showed unequivocal sign of mountain lion predation as the proximate cause of death, and none appeared malnourished, however, the extent to which balloon or ribbon blockage may have contributed to vulnerability to predation is unknown. Ingestion and subsequent entrapment of balloons in the rumen may have been sub-clinical in nature, with limited negative impact from displacement of digesta, or at the other extreme, animals could have suffered alimentary lacerations as a result of gastric motility, a normal part of rumen digestive process (e.g., eructation), causing the serrated ribbons to act like knives (B. Gonzales, CDFW, personal communication with J. Villepique).
Vulnerability to predation could also have resulted from choking or coughing due to entanglement in the esophagus. In each of those cases, the esophagus and neck where damaged and/or consumed, as is commonly the result of the feeding patterns of mountain lions. Consequently, what, if any, role the ingestion of latex balloons and attached ribbons played in the vulnerability to predation by mountain lions remains unknown.

The ingestion of balloons by ruminants is capable of causing direct mortality through mechanisms mentioned, and is clearly detrimental. The San Bernardino Mountains is frequently a landing area for balloons that have escaped or been released, due to weather patterns and landscape terrain. Biologists believe that bighorn sheep are attracted to, and ingest brightly colored balloons, having experienced no selective pressure in their evolutionary history to differentiate novel substances that mimic colors of bright colored forage, beneficial flowers, or fruits.

The Cushenbury bighorn sheep population hosts an endemic infection of *Psoroptes*, a parasitic mite, causing a condition known as psoroptic mange or psoroptic scabies (Blecih et al 2015). They can affect the general health of bighorn sheep. *Psoroptes* mites can result in lesions in the external ear canal resulting in hearing impairment that may result in increased predation due to the inability to detect predators (Norrix *et al.* 1995).

Over the past couple of decades, there have been a number of reports of feral or loose dog packs roaming in and near the Cushenbury bighorn sheep population. An attack by 3 apparently feral dogs on two male bighorn sheep was documented in 2007, with an injured ram observed the following day. The ram was not seen again and is presumed to have been killed by the dogs, which remained in the area for weeks. Predation by dogs on female bighorn sheep may be an additive mortality factor linked to the apparent decline in this population (CDFW data).

Since 1990, there have been at least two bighorn sheep killed on Highway 18 in Cushenbury Canyon, including a ram in the early 1990s and a collared 2-year-old ewe in November 2008 (CDFW data). Prior to 2006, there were few records of bighorn sheep using the east side of Highway 18; however GPS collars deployed in 2006 and 2007 indicated a total of 61 crossings of Highway 18 by six GPS-collared females. Because GPS collars were programmed to collect data at a frequency of 4–6 hours (longer in practice, because of reduced GPS fix success inside the deep Cushenbury Canyon), these data represent the minimum number of crossings as movements of up to 6 hours duration could go unrecorded. Use of areas east of Highway 18 typically lasted 1–2 days; however, in one instance, several GPS-collared ewes remained east of Highway 18 for 36 days. There may be deficiencies in the habitat quality (e.g., water sources, browse availability, lack of escape terrain, etc.) east of Highway 18, however, systematic habitat evaluations and comparisons have not been conducted.

There is some evidence that groups may be crossing Highway 18 more frequently than in the past and using areas east of Highway 18. Reports from drivers seeing groups instead of individuals seem to be increasing. Additionally, drivers reporting seeing sheep actually crossing the road (instead being seen above or along the road) seem to be more frequent On January 6, 2013, a group of 7 bighorn sheep were observed crossing Highway 18 (SBNF records). On
January 3, 2013, a group of ten bighorn sheep were documented crossing Highway 18, west-east, and observed again on the east side on January 4th. A group was also photographed crossing Highway 18, west-east, by a motorist in June, 2013, and in subsequent winters 2017–2018 and 2018–2019 (CDFW data).

The Forest Service has a single record of poaching of a bighorn sheep in the mid-1980s in the White Mountain area. A prospector came upon a campsite (probably a subsistence miner as described above) that appeared to have been occupied for some time. A butchered bighorn sheep was hanging from an oak limb. All that remained was the head, suggesting that the animal was taken for food (Forest Service records 1991).

While the Cushenbury population of bighorn sheep appears to tolerate ongoing mining activities, the effects of additional losses of habitat and disturbance outside of the existing footprint of quarries and active roads is unknown. Novel disturbance in formerly undisturbed areas used by bighorn sheep may result in negative demographic impacts. Long-term viability is a concern as a result of the small and isolated nature of this population. Short-term viability may also be in jeopardy.

The Cushenbury bighorn sheep population appears isolated from other bighorn sheep populations and has a relatively low genetic diversity and was identified as having experienced a bottleneck, with lower diversity than its presumed source, the San Gorgonio population (Epps et al. 2010). Epps et al. (2010) concluded that the founder event that colonized the Cushenbury population was not followed by a level additional immigration/emigration and gene flow, as in other populations analyzed, and was the likely cause that the Cushenbury population had the lowest level of genetic heterozygosity of populations sampled. If the Cushenbury population now contains only fifteen animals as suspected, the population may have experienced further loss of genetic variation reducing the population’s potential to adapt to environmental conditions.

While SBNF records suggest occasional sightings between The Cushenbury and San Gorgonio populations, those sparse observations suggest that these movements are likely rare. In early 2016, fecal pellets were collected for DNA analysis of five mature male bighorn sheep observed near the Mitsubishi plant and not previously documented in the Cushenbury population. Analysis determined their genetic “fingerprints” were consistent with an origin in either the Cushenbury or San Gorgonio populations, which share several genetic markers. Analysis failed to resolve from which population the males originated but ruled out movement from the Ord or Rodman mountains to the north (Jeff Villepique personal communications with Clint Epps, Oregon State University). The presence of those males does not guarantee gene flow, as the rams were observed in winter, and range of breeding is thought to generally occur after June, extending into autumn.

The high degree of isolation may have negative genetic consequences; while, demographic isolation remains of great concern. Stochastic mortality (e.g., heavy snowfall events, predation, landslides) in addition to human-caused mortality (e.g., vehicle strike, falls as a result of anthropogenic disturbance) present a greater risk to the population because demographic rescue by immigration appears to be a rare occurrence. Even the loss of an individual bighorn sheep ewe is significant in small isolated populations. Without occasional movements between
subpopulations, the abilities for genetic exchange and repopulation of depleted areas are compromised (Bleich et al. 1996, Bleich 2010).

The long-term viability of the Cushenbury population is uncertain because it is so small and isolated. This places it at a higher risk for extirpation than larger, less-isolated populations, including the San Gorgonio Wilderness bighorn sheep population. A single episode such as disease, drought resulting in lack of forage or water, a mountain lion targeting bighorn sheep, etc. could have devastating effects to this population.

Occurrence in the Analysis Area: The Cushenbury bighorn sheep population is currently believed to number 15–20 individuals (CDFW data), down from an estimated 40–50 in the 1990s. Lambing areas have not been validated. Tracking data suggest important foraging areas and movement patterns. CDFW’s GPS tracking studies of the Cushenbury population have found high use of the area between the proposed South Quarry and existing Cushenbury quarry, and on lower and upper slopes of Marble Canyon. The proposed haul road location would bisect the two high-use areas.

During the 1990s and early 2000s, when the Cushenbury population was apparently larger, the steep rugged terrain around Arctic Canyon, Furnace Canyon, Bousic Canyon, and Crystal Creek was also regularly used by bighorn sheep. The use in those western areas appears to have declined since the late 2007 due to a presumed disease outbreak caused by feral sheep and goats as described previously. Recent bighorn sheep sightings may indicate that the local population is again using those areas.

CDFW tracking studies have found statistical significance in areas selected by Cushenbury bighorn sheep within areas disturbed by mining (defined as roads, quarries, and waste dumps visible on NAIP 1-m aerial photos). Sheep selected mine re-vegetation sites for foraging twice as often as would be expected and selected inactive mine quarries more than would be expected, while avoiding active mine quarries (CDFW data). Another CDFW analysis provided preliminary results indicating that the best predictor of habitat use by the Cushenbury population is ruggedness of habitat. The analysis found that ewes generally avoid areas with trees, however males may use areas with tree cover.

Bighorn sheep ewes generally lamb in solitary locations, away from all other sheep. This strategy of isolation confers protection from predation for vulnerable neonatal lambs. Other studies have shown simultaneous and near simultaneous use of disparate lambing areas. Data from GPS collars deployed in the North Slope population suggest multiple lambing areas, leading to the inference that rugged areas in several places may be important for lambing (CDFW data).

CDFW Take for Desert Bighorn Sheep: Desert bighorn sheep are designated Fully-Protected Mammals under section 4700 of the Fish and Game Code (FGC), which prohibits “take.” The narrow exception of FGC 4902 allowing for take, defined under the FGC, as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill,” is inapplicable to the North Slope Bighorn Sheep Conservation Area. Consequently, projects must be designed to avoid take. The Design Features include measures intended to reduce the likelihood of death or injury of bighorn sheep. In addition, the Design Features state that mines will participate in a
North Slope Bighorn Sheep Conservation Strategy. The Strategy will include guidance for monitoring and herd augmentation.

Summary for Desert Bighorn Sheep: Due to the small size of the Cushenbury bighorn sheep population and apparent decline over the past two decades, there is concern that the Cushenbury population may not be viable and is very susceptible to extirpation, even without the South Quarry development (Bleich 2010).

A population of fewer than 15 animals poses a variety of problems for viability, including genetic bottlenecking and extremely high susceptibility to stochastic events. Such a low number warrants augmentation to achieve demographic, and particularly in the case of the Cushenbury population, genetic rescue. Further reductions in habitat for foraging, lambing, and escape, however, are likely to reduce carrying capacity below ~50, which, combined with fragmenting important use areas, may cause the Cushenbury bighorn sheep population to “blink out”. Disturbance and lack of adequate high-quality habitat may result in displacement of bighorn sheep into areas of lower quality habitat that are unable to sustain the population over the project life. Small groups of bighorn sheep may hang on for a few years in lower quality habitat and in patches of higher quality habitat; but over time, the population may disappear without a strategic plan to protect high quality habitat and movement throughout their range, and affect augmentation when criteria suggest it is warranted.

Maintaining a viable population of bighorn sheep in the Cushenbury population will require minimizing impacts to habitat and implementation of an adaptive management approach to conserve resources critical to the persistence of a healthy population. There is a high degree of uncertainty about the potential effects to the Cushenbury bighorn sheep population, especially for a project that is expected to last between 40 and 120 years. We cannot adequately predict the other activities and events over the next 10–20 years (much less 120 years) that may affect this bighorn sheep population. If the population is at the current carrying capacity for the finite North Slope landscape, any further impediments to movement, losses of habitat, and other effects may result in loss of this population during the life of the project.

BIGHORN SHEEP MANAGEMENT
The intent of the management actions described here is to reduce the risk to desert bighorn sheep as a result of mining operations, through an adaptive management approach wherein monitoring and management activities are coordinated among public agencies and mining operators that have activities on NFS lands on the North Slope. They are intended to provide for equity and consistency between the North Slope mine operators conducting activities on the North Slope and limit the potential for loss/degradation of bighorn sheep habitat or disturbance that could harm, harass, or result in mortality.

These measures have been developed in conjunction with CDFW and the USFS.
**BIGHORN MANAGEMENT MEASURES**

The following bighorn sheep management measures will be implemented by the mining companies in accordance with the BHSCS. The SBNF will also participate and will contribute subject to availability of staff and appropriated funds.

**BHS-1 Foraging Habitat:** When trucks spray water on haul roads to control fugitive dust, some overspray occurs on road berms for a short distance beyond. Those watered areas sometimes support vegetation that bighorn sheep consume. Mining companies will not make an effort to eliminate the overspray. The Revegetation Plan will focus on using native species that will help enhance bighorn sheep habitat.

**BHS-2 Water Developments:** Water sources shall be maintained and monitored weekly to ensure water is available to bighorn sheep. In the event that bighorn sheep abandon the use of one or more water developments as a result of disturbance associated with the mining activities, the appropriate mining company shall create additional water development(s) after consulting with appropriate agency personnel (USFS and CDFW) to select location(s) for replacement or augmentation of existing water development(s). Mining companies shall ensure that any existing water developments, as well as any created as part of the Design Features/Mitigation Measures, are maintained in good operating condition for the duration of the project.

**BHS-3 Reporting of Mortality:** The mining companies shall immediately report any bighorn sheep mortalities, whatever the cause, to the CDFW and Forest Service as soon as possible after the observation. The bighorn sheep carcass shall covered and be left in place until the CDFW or Forest Service biologist can examine it and determine the proper disposal method. In the event that mountain lion predation is occurring at levels that compromise the viability of the population, the mining companies shall cooperate fully by ensuring access to the properties to determine the predator involved or, in the event that an individual predator has been identified, for potential removal or aversive conditioning of the predator.

**BHS-4 Monitoring of Population:** The mining companies shall monitor bighorn sheep use in and near their operations and at water sources in and adjacent to their operations. Monitoring shall consist of maintenance of cameras stationed at water sources and recording of data from cameras in a database developed by CDFW, as well as collection of observations by mine company employees and delivery of photos, locations, and observation notes to CDFW. The North Slope Bighorn Sheep Management Strategy may identify other monitoring methodology to be implemented over time. An annual monitoring report will be provided to the Forest Service and CDFW.
**BHS-5 Highway Crossing:** Upon obtaining the necessary approvals from Caltrans, Mitsubishi Cement Corp. (MCC) shall fund, purchase and install highway warning signs on State Route 18. Design of signage should maximize effectiveness as provided in the necessary approvals from Caltrans. MCC shall use best efforts to obtain the Caltrans approvals necessary to install the highway warning signs on State Route 18. The intent of the signs is to avoid vehicle-strike mortality or “take” of bighorn sheep crossing the highway.

**BHS-6 Future Conservation and Management:** The mining companies have agreed to contribute to a non-wasting endowment, designated as the North Slope Bighorn Sheep Conservation Fund (Fund). The amount of suggested contributions was determined by CDFW in coordination with the individual mining companies (“NON-WASTING ENDOWMENT,” below and Appendix A). The Fund shall be administered by a third party certified by the State and shall be managed as a long term, non-wasting endowment dedicated to activities that aid in conservation and monitoring of bighorn sheep both within the Cushenbury population and on proximate habitats, occupied or unoccupied, including the Bighorn Mountains and San Gorgonio Wilderness where immigration and emigration may connect groups into a functional metapopulation.

**BHS-7 Bighorn Captures and Augmentation of Population:** The mining companies shall facilitate capture and translocation of bighorn sheep by CDFW by making available access to such areas as needed for helicopter landings, deployment and baiting of drop-nets, or other techniques where mine operations may be required to avoid an area of mutual agreement for a period of days or weeks.

**BHS-8 Employee Awareness Training:** Mines will consult with the CDFW to incorporate bighorn sheep education and awareness into their training for employees and contractors. Training will include how to minimize impacts to bighorn sheep and include guidelines for driving, operation of heavy equipment, general quarry operation, and blasting in bighorn sheep habitat

**BHS-9 Work Boot Decontamination.** As part of the worker training required under Design Feature/Mitigation Measure BHS-8, all quarry workers will be trained on the importance of and procedures for decontaminating boots to prevent transmission of disease from domesticated sheep and goats to bighorn sheep. In addition, all quarry workers who have potential contact with domesticated sheep and/or goats (for example at farms, fairs, etc.) will be identified and shall decontaminate work boots prior to entering the Project area. Decontamination shall involve scrubbing the soles of work boots with a 10-percent bleach solution to remove all organic matter and kill pathogens. Alternatively, footwear may be changed to ensure that potentially contaminated footwear does not enter any quarry area.
STANDARD DESIGN FEATURES FOR MINING AND OTHER PROJECTS ON THE NORTH SLOPE

General
DF-1. Participate in the North Slope Bighorn Sheep Conservation Strategy

DF-2. Disturbance footprints for mine operations and development of new quarries and roads allowing access to minerals shall be limited to the greatest extent possible to the goal of minimizing impacts to adjacent habitat and sensitive biological resources.

DF-3. If wetting or soil bonding agents used for dust control appear to be attracting wildlife to the roadways (e.g., by pooling or creating mineral licks), the mining operator will work with the Forest Service and CDFW to develop remedies.

DF-4. All vehicles and equipment shall be maintained in proper working condition to minimize the potential for spill of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Spills will be cleaned up as quickly as possible.

DF-5. Mine operators will maintain facilities and grounds in a manner that minimizes any potential impacts to raptors, predators, and scavengers (e.g., minimize storing materials that may attract prey species, remove trash/garbage daily, etc.). All trash and food-related waste shall be secured in self-closing animal-proof containers and removed daily from mining areas and roads.

DF-6. Mine operators, employees, and contractors shall not be permitted to engage in target shooting on USFS lands in or around the permitted area of mine operation.

DF-7. The mine operators shall conduct wildlife/plant awareness programs for employees (including new employee orientation and annual refresher trainings). The program will address bighorn sheep awareness. This will include the importance of avoiding harassment/disturbance, adherence to speed limits, adherence to defined project boundaries, reporting guidelines, etc. The mine operators will solicit input from CDFW and USFS in developing the training program.

Reclamation
The timing and planning of reclamation measures at sites away from active quarries, haul roads, and processing areas will consider improving or creating suitable foraging and nesting habitat for raptors. These measures may include:

RE-1. Phase reclamation where possible to re-establish suitable habitat for forage species in areas where mining activities have ceased.: Operating plans shall be designed to allow for concurrent reclamation and revegetation, to the maximum degree practicable; benches should be re-vegetated.

RE-2. Final benches shall be designed to incorporate “ramps” allowing movement of bighorn sheep and other terrestrial animals as soon as active mining is completed and safety
concerns allow it.

RE-3. Where escape terrain is lacking, consider enhancements to quarries during recontouring phases of reclamation.

RE-4. Restrict vehicle use and human activity to the extent possible in reclamation and reclaimed areas. Remove and reclaim roads where possible in accordance with County approved Reclamation Plan. This does not preclude viewing for educational or informational purposes.

RE-5. Revegetate with local native plant species that are favorable browse species as determined by USFS or CDFW.

RE-6. If natural water sources are lacking in reclamation areas, evaluate the feasibility of artificial water sources (wildlife drinkers, guzzlers, catchment structures, etc.) during the reclamation period.

POSSIBLE PROTECTION MEASURES BASED ON NEED AS DETERMINED BY MONITORING RESULTS
Because this BHSCS is viewed as a long-term management strategy with the expectation that the mining operations may exist a century or more after approval, these measures are viewed as a tentative toolbox of possible approaches. Depending on site-specific conditions, one or more of these measures may be appropriate. Alternatively, development of new measures may be more appropriate, especially in response to changes in mining technology, changes in wildlife monitoring/management techniques, and based on a better understanding of the ecology of bighorn sheep.

PM-1. Where monitoring detects changes in behavior of bighorn sheep that can be attributed to blasting activities, use of noise attenuation devices or alternative mining techniques will be considered for use during the breeding season. The objective is to conduct blasting while minimizing changes in behavior that could result in “take.”.

PM-2. If lambing areas are identified in close proximity (e.g., <1 mile) to the disturbance activity and there is a lack of intervening topography that may reduce risk to bighorn sheep, a Limited Operating Period (LOP) will be considered with a restriction on blasting (or other activities likely to cause injury or mortality) during the lambing season.
NON-WASTING ENDOWMENT
Voluntary contributions to a non-wasting endowment for conservation of North Slope Bighorn Sheep Conservation (Fund) will provide long-term funding of management actions detailed below. Amounts of contributions, and the formulae for their allocation are found in Appendix A. The Fund shall be held by a third party organization certified by the State to manage such endowments (e.g., a certified ‘Due Diligence’ entity; https://www.wildlife.ca.gov/Conservation/Planning/Endowments) and shall allow, under the direction of CDFW, expenditures in accordance with guidance in this document.

Funds shall be used only for goods and activities that further the maintenance or re-establishment of a viable population of bighorn sheep within the North Slope San Bernardino Mountains bighorn sheep conservation area. Those expenditures include costs to capture and translocate bighorn sheep from other populations for augmentation of the North Slope population, capture and collaring of bighorn sheep within the North Slope population, field and laboratory studies of physiology, behavior, habitat and habitat selection, or forage and water quality.

In the event that data may demonstrate immigration/emigration between the North Slope population and nearby populations as a metapopulation (Bleich et al. 1996), funds may be expended on studies or management actions (e.g., establishment of water sources) on intervening habitat or within those adjacent populations comprising a functional metapopulation.

Only in the event that the North Slope population is deemed non-viable because of changes in climate, vegetation, or other factors that render the area unsuitable for maintenance of desert bighorn sheep, the Fund may then make expenditures to further the conservation of nearby populations, such as the higher-elevation San Gorgonio population, which may serve as a climate refugium owing to bighorn sheep habitat extending to elevations of 11,500 ft.
**Literature Cited**


(editor). Metapopulations and wildlife conservation. Island Press, Covelo, California, USA.


https://www.nature.com/articles/s41598-017-11285-y


Appendix A: Non-wasting endowment, adapted from 2013 proposal

Objective: Maintain a viable population of bighorn sheep in an adaptive management framework that monitors success while generating knowledge about impacts of mining and efficacy of active management, by efforts funded through voluntary participation in a non-wasting endowment.

Rationale: The cumulative effect of proposed quarries, when added to existing disturbance from mining operations, reduces habitat and concomitant carrying capacity, whereas related noise, traffic, and activity could cause additional stress to the population. An adaptive management approach will be implemented to conserve critical resources for bighorn sheep and increase the probability of persistence in this small population of bighorn sheep. Management actions will be funded, in part, by voluntary contributions to a non-wasting endowment. That fund will generate monies enabling capture of bighorn sheep, purchase of collars or other monitoring equipment, or funding of personnel or laboratory analysis as part of studies to monitor and evaluate population performance and efficacy of adaptive management strategies. Should such an action be warranted, the endowment will fund capture and translocation of bighorn sheep for augmentation or re-introduction to the North Slope population. The current (as of 2013) population contains <10 ewes and warrants augmentation. Further reductions to habitat available for bighorn sheep are likely to require augmentation for demographic or genetic rescue at a recurring interval of 5–10 yrs.

Formula: The amount of endowment required to support active management that ensures persistence of bighorn sheep is based upon the cost of a translocation effort (Table 1). Conduct of a translocation at an 8–9 year interval requires an endowment of $600,000 (at 3.5%, inflation-adjusted capitalization rate). The proportion of responsibility assigned to each project proponent is assigned based on a formula weighing the cumulative impact of existing disturbed acreage within bighorn sheep range plus three times the weight of the proportion of use by bighorn sheep within the footprint of proposed expansion projects (Mitsubishi South, Omya Butterfield 3 and Sentinel; Table 2).
Table 1. Cost estimate for translocation of bighorn sheep from nearby population to North Slope* (from 2013 proposal for non-wasting endowment)

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>GPS Telemetry Collars, remote download and drop-off capability (15 × $4,550)</td>
<td>$68,250</td>
</tr>
<tr>
<td>GPS Download Unit</td>
<td>$4,000</td>
</tr>
<tr>
<td>Helicopter and crew ferry time (16 hrs × 1,525/hr)</td>
<td>$24,400</td>
</tr>
<tr>
<td>Capture time for 15 animals (15 × $1,500/animal)</td>
<td>$22,500</td>
</tr>
<tr>
<td>Helicopter support mileage (fuel truck; 2,000 × $2.85/ mile)</td>
<td>$5,700</td>
</tr>
<tr>
<td>Helicopter crew per diem (16 × $125/day)</td>
<td>$2,000</td>
</tr>
<tr>
<td>DFW Veterinarian and support staff salary</td>
<td>$6,000</td>
</tr>
<tr>
<td>DFW Veterinarian and support staff per diem</td>
<td>$1,560</td>
</tr>
<tr>
<td>Laboratory work for biological samples (15 × $200/animal)</td>
<td>$3,000</td>
</tr>
<tr>
<td>Treatment for <em>Psoroptes</em> (as necessary; 15 × $100/animal)</td>
<td>$1,500</td>
</tr>
<tr>
<td>Subtotal goods, services, labor for translocation of 15 bighorn sheep</td>
<td>$138,910</td>
</tr>
<tr>
<td>DFW administrative overhead rate; 29%</td>
<td>$ 40,284</td>
</tr>
</tbody>
</table>

**TOTAL COSTS FOR TRANSLOCATING 15 BIGHORN SHEEP** $179,194

*Source animals for translocation are assumed to be available for free.

Table 2. Allocation of responsibility, assuming 3:1 weighting of proposed expansion to existing disturbed area (cumulative impact formula 3:1) and $600,000 non-wasting endowment at 3.5% capitalization rate.

<table>
<thead>
<tr>
<th>Mine</th>
<th>Existing Disturbed Acreage</th>
<th>Proportion</th>
<th>Wt. Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitsu</td>
<td>526.69</td>
<td>0.44</td>
<td>1</td>
</tr>
<tr>
<td>Omya</td>
<td>197.75</td>
<td>0.16</td>
<td>1</td>
</tr>
<tr>
<td>SMI</td>
<td>476.59</td>
<td>0.40</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>1201.03</td>
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</tr>
</tbody>
</table>

**Bighorn locations in proposed expansion**

<table>
<thead>
<tr>
<th>Mine</th>
<th>Proportion</th>
<th>Wt. Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitsu</td>
<td>0.87</td>
<td>3</td>
</tr>
<tr>
<td>Omya</td>
<td>0.13</td>
<td>3</td>
</tr>
<tr>
<td>SMI</td>
<td>0.00</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>523</td>
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</tr>
</tbody>
</table>

**Weighted Proportional Responsibility**

<table>
<thead>
<tr>
<th>Mine</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitsu</td>
<td>$458,131.20</td>
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<tr>
<td>Omya</td>
<td>$82,345.66</td>
</tr>
<tr>
<td>SMI</td>
<td>$59,523.13</td>
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</tbody>
</table>

Table 3. Adjustment of allocation amounts from Table 2, above, after applying inflation (CPI adjusted, June 2013–September 2018; from www.bls.gov/data/inflation_calculator.htm).

<table>
<thead>
<tr>
<th>Mine</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitsu</td>
<td>$495,281</td>
</tr>
<tr>
<td>Omya</td>
<td>$89,023</td>
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<tr>
<td>SMI</td>
<td>$64,350</td>
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</tbody>
</table>