



Omya California

7225 Crystal Creek Road
Lucerne Valley, CA 92356

Tel: (760) 248-5200
Fax: (760) 248-9115

November 28, 2011

Mr. Tom Gillett
Deputy Forest Supervisor
U.S. Forest Service – San Bernardino National Forest
602 S. Tippecanoe Avenue
San Bernardino, CA 92408

Dear Mr. Gillett:

In December 2009, Omya California submitted an Amended Plan of Operations for the Butterfield 3 Quarry (B-3) Expansion Project. After receiving input from U.S. Forest Service (USFS) staff and additional operational considerations, Omya California has developed a modified project description for the B-3 Expansion Project.

The modified description includes the additional planned disturbance in the Sentinel Quarry area to allow for optimized operations, minor modifications to existing disturbance boundaries for as-built facilities and a proposed mitigation for disturbance of the carbonate species habitat.

Following concurrence of USFS staff for the project and specifically the proposed mitigation areas, Omya will modify the previously submitted Amended Plan of Operations to incorporate the additional areas.

If you have any question regarding the information submitted or require additional documentation, please feel free to contact me at (760) 248-5223 or via e-mail at christine.granquist@omya.com.

Sincerely

Christine Granquist
Manager of Environmental and Regulatory Compliance
Omya California Inc

Attachments



PROJECT DESCRIPTION

Butterfield 3 Quarry Area (unchanged from previous submittal)

The existing permitted Butterfield 3 Limestone Quarry is located on mining claims within the San Bernardino National Forest. Limestone ore reserves have been substantially increased and a quarry expansion proposed will add an additional twenty years to the current five year quarry life and will allow mining to be extended until 2035, when final reclamation will begin.

The expansion includes a total of 28.8 acres, for the quarry expansion and includes expansion of the existing quarry to include the geologically contiguous Butterfield 2 area, and reactivation of the previously mined Butterfield 4 area, all to be incorporated into the Butterfield 3 footprint. There are no new quarries proposed in this plan, only the phased expanded development and ultimate reclamation of the existing Butterfield 3 quarry.

Sentinel Quarry Area

The existing permitted Sentinel Limestone Quarry is located on mining claims within the San Bernardino National Forest. An additional 22 acres of disturbance is proposed for the Sentinel Quarry area. Changes within the Sentinel area include expansion of overburden placement sites, additional haul road area and minor adjustments to existing disturbance boundaries to accommodate as-built facilities. These changes allow for substantial optimization of the Quarry's operational activities.

Of the 22 acres of proposed disturbance at the Sentinel Quarry, 2.3 acres fall within the critical habitat boundary. There are no known populations of *Cushenbury Oxytheca*, a federally listed threatened and endangered plant, within the proposed disturbance areas.

Mitigation Land Proposal

Following guidance from the Carbonate Habitat Management Strategy and USFS, Omva would relinquish the following unpatented mining claims for the proposed disturbance areas.

Butterfield 3 Quarry Area

The USFS has determined the mitigation target for the Butterfield 3 quarry area to be a total conservation value of 72.9. Additional consideration was given to area occupied by *Cushenbury Oxytheca* (required mitigation value of 44.1) and critical habitat disturbance (required mitigation value of 42.6).

Sentinel Quarry Area

The USFS has determined the mitigation target for the Sentinel quarry area to be a total conservation value of 32.1. Additional consideration was given to the additional disturbance of critical habitat (required mitigation value of 7.2). There was no *Oxytheca* occupied area within the Sentinel Quarry Expansion Area.



The table below shows the estimated conservation values for Omva's proposed mitigation.

| Area/Claim | Oxytheca Occupied Area | Oxytheca Critical Habitat | Unadjusted Conservation Value |
|----------------------------------|------------------------|---------------------------|-------------------------------|
| Proposed B-3 Area | 44.1 | 42.6 | 72.9 |
| Proposed Sentinel Area | 0 | 7.2 | 32.1 |
| Total Required Mitigation | 44.1 | 49.8 | 105.0 |
| South 1/2 of CC#9 | 8 | 28 | 31 |
| White Rock #1 | 8.7 | 0 | 12.2 |
| White Rock #2 | 7.9 | 0 | 11.5 |
| Hilltop #1 | 6.5 | 18 | 12.3 |
| Hilltop #2 | 12.6 | 18 | 15.9 |
| Hilltop #3 | 5 | 17 | 11.8 |
| Hilltop #4 | 0 | 3 | 7.9 |
| Hilltop #6 | 2 | 0 | 8.3 |
| Mitigation Total | 50.7 | 84.0 | 110.9 |