

2. The applications do not include additional offsite wetland creation reclamation included in the Compensatory Mitigation Plan (CMP) submitted as part of the response to the 1st RAI of the FDEP as part of the pending state ERP and Section 404 applications for the G Lands. The CMP is proposed to offset the temporal impacts to wetlands ecosystem functions during the mining and reclamation process. In the CMP Introduction, the additional mitigation is described as being needed to “accommodate 615.3 acres of additional mitigation needs due to time lag, wetland reclamation is also proposed within adjacent, previously permitted WSA-owned lands (HC-RCS-10, HCRCS-11, and HC-RCS-16) ...”. Please revise to MMP and SP text and map series to accurately reflect additional mitigation described in the CMP.

Additional Mitigation Wetlands have been updated in the MMP and SP text and map series reflecting Table 1 from the CMP that is being resubmitted as part of the pending state ERP and Section 404 applications for the G Lands RAI2 (Map VII-5 Post Reclamation Landuse sheets 1 & 2 of 2).

Summary of Onsite Mitigation Wetlands

Reclamation Unit ID	Wetland Acreage	FLUCFCS Code ¹	FLUCFCS Description
HC-RCS-18	63.1	630	Wetland Forested Mixed
HC-RCS-19	66.9	630	Wetland Forested Mixed
HC-RCS-20	373.0	630	Wetland Forested Mixed
HC-HC-13	0.7	617	Mixed Wetland Hardwoods
	32.4	620	Wetland Coniferous Forest
	92.6	630	Wetland Forested Mixed
HC-HC-10	203.7	630	Wetland Forested Mixed
HC-RCS-11	9.1	630	Wetland Forested Mixed
HC-RCS-16	5.4	617	Mixed Wetland Hardwoods
	413.7	630	Wetland Forested Mixed
Total	1,260.6		

¹ Florida Land Use, Cover and Forms Classification System. Third edition. Florida Department of Transportation, 1999.

3. The **WSA 1st RAI** response provides a description of proposed new Reclamation Units PCS-HC-HC(13), PCS-HC-RCS(18) and PCS-HC-RCS(19) that identifies a portion of the reclamation as partially consisting of land and lakes. The description also states that fill dirt from surrounding uplands that are not mined will be utilized rather than pumping sand. It does not appear that the wetland reclamation for the proposed reclamation units in the pending applications for state ERP and Section 404 permits for those same areas includes any land and lakes reclamation and does not mention obtaining fill from adjacent uplands. Please submit a revised reclamation plan description that is consistent with the reclamation described and depicted in the latest G Lands state ERP and Section 404 permit application submittal.

The reclamation units will be reclaimed as wetlands (acre for acre, type for type) as land and lakes reclamation method, however, no lakes will be created as there is no tailings fill proposed for the reclamation of the mitigation areas PCS-HC-HC(13), PCS-HC-RCS(18) & (19). To achieve the required wetland acreage, fill dirt from surrounding uplands that are not mined will be used rather than pumping sand. Submitting a new map series showing the Location of Premining Uplands identified to source fill dirt proposed to be used as Wetland Mitigation Fill for reclamation of PCS-