November 3, 2022

Scott Shirley
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Re: WSA MMPA and SP Application – Hamilton County 2nd RAI - Responses

Mr. Shirley,

Please find, provided for your review, our response to the 2nd RAI for the White Springs Master Mining Plan Amendment (MMPA) and Special Permit (SP) Application. White Springs received the email from you with comments on September 16, 2022. White Springs feels the following will satisfy or answer all the comments received.

1. *The applications do not reflect the details for Alternative #3 for mining in the proposed G lands wetlands areas, which the Applicant has identified as the "preferred alternative" in the Alternatives Analysis submitted to FDEP on June 28, 2022, as part of the pending state ERP application and Section 404 permit application. As stated in Alternatives Analysis Section 2.2.3, Alternative 3 "further decreases the spatial coverage of the 'mined and disturbed' footprint within existing onsite wetlands, resulting in a total of 492.9 acres of wetland impact and 382.37 units of functional loss, requiring 1,244 total acres of reclamation." Please revise the MMP and SP text and map series to accurately reflect inclusion of Alternative 3 as the preferred alternative.*

   The preferred alternative (alternative 3) updated post reclamation landuse is reflected on the MMP and SP text and map series. Please reference Table 1 from the CMP Summary of Onsite Mitigation Wetlands for the breakdown of Onsite Wetlands Mitigation Acreages by Reclamation Unit and note that the mitigation is greater than acre for acre by 16.6 acres

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.

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-

HC-HC (13) and PCS-HC-RCS (18) & (19). Please also see response to next question #4 from RAI2 regarding creation of a new map series to depict the location of the Uplands to be used as Wetland Mitigation Fill for this reclamation.

From RAI1 Responses and in response to RAI2 #3 (continued)

Newly Added Reclamation units PCS-HC-HC(13) and PCS-HC-RCS (18), (19) and (20) - As to each of the newly added reclamation units (RU) referenced in the first bullet on page 3 of the MMPA, please submit a brief narrative that describes the characteristics of the RU in terms of pre and post mining/reclamation topography, land use, vegetative cover, and proposed type of reclamation.

Please submit a revised reclamation plan description . . .

- **PCS-HC-HC(13) – Reclamation Unit PCS-HC-HC(13) topography post reclamation will be returned to the pre-mining condition with elevations from 120 – 125 feet. The reclamation unit will be reclaimed mostly as wetlands (acre for acre, type for type) as land and lakes reclamation method, however, lakes will not be created as there is no tailings fill proposed for the reclamation of these mitigation areas. To achieve the required wetland acreage, fill dirt from surrounding uplands that are not mined will be used rather than pumping sand. Seventy-three (73) acres of upland from PCS-HC-HC(13) will be reclaimed as wetland to achieve the required mitigation wetland reclamation acreage.**

- **PCS-HC-RCS(18) - Reclamation Unit PCS-HC-RCS(18) topography post reclamation will be returned to the pre-mining condition with elevations from 125 – 130 feet. The reclamation unit will be reclaimed as wetlands (acre for acre, type for type) as land and lakes reclamation method, however, lakes will not be created as there is no tailings fill proposed for the reclamation of these mitigation areas. To achieve the required wetland acreage, fill dirt from surrounding uplands that are not mined will be used rather than pumping sand. One hundred ninety-six (196) acres of upland from PCS-HC-RCS(18) & (19), along with portions of PCS-HC-RCS (10) & (11), will be reclaimed as wetland to achieve the required mitigation wetland reclamation acreage.**

- **PCS-HC-RCS(19) - Reclamation Unit PCS-HC-RCS(19) topography post reclamation will be returned to the pre-mining condition with elevation of 130 feet. The reclamation unit 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 these mitigation areas. To achieve the required wetland acreage, fill dirt from surrounding uplands that are not mined will be used rather than pumping sand. One hundred ninety-six (196) acres of upland from PCS-RCS(18) & (19), along with portions of PCS-HC-RCS (10) & (11), will be reclaimed as wetland to achieve the required mitigation wetland reclamation acreage.**

- **PCS-HC-RCS(20) - Reclamation Unit PCS-HC-RCS(20) topography post reclamation will be returned to the pre-mining condition with elevations from 130 – 135 feet. The reclamation unit will be reclaimed as wetland (acre for acre, type for type) as tails fill reclamation method to achieve the required wetland acreage. Three hundred seventy-eight (378) acres of upland from PCS-HC-RCS(20) and portions of PCS-HC-RCS (16), will be reclaimed as wetland to achieve the required mitigation wetland reclamation acreage.**

4. *Also, regarding the proposed new mining units in the preceding paragraph, please include a clear identification of the upland source of fill dirt proposed to be utilized in the reclamation, if this is the type of reclamation proposed.*

   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-HC-HC (13) and PCS-HC-RCS (18) & (19).

5. *Proposed new Reclamation Units PCS-HC-RSC(18), (19) and (20) are all adjacent to, or in close proximity to, the regionally significant Bee Haven Bay wetland system, as well as other offsite wetlands. Please provide a description of the measures to be taken minimize impacts to these important offsite wetlands, including, but not limited to, measures directed to preventing adverse impacts to groundwater hydrology in the surficial aquifer in order to prevent dewatering adjacent and nearby wetlands.*

   To prevent hydrologic impacts to the regionally significant Bee Haven Bay wetland system as well as other "offsite" and onsite wetlands, a network of piezometers will be installed along the project boundaries of PCS-HC-RCS(18), (19) & (20) and will be continuously monitored to ensure groundwater levels remain at desired elevations. Water levels in the primary drainage ditch will be maintained to sufficiently rehydrate the surficial groundwater. Mined pits will be allowed to partially refill, which increases the surficial groundwater and reduces the cone of depression. Additionally, best management practices will be utilized during construction to prevent water quality impacts to offsite wetlands.

   Methods to contain turbidity may include the use of staked filter cloth, silt-control polymers, sodding, seeding, mulching, and the deployment of turbidity screens around the immediate project site, as appropriate for each disturbance area. Erosion and turbidity control devices will be inspected and maintained on a regular basis during all phases of mining operations and reclamation. Existing vegetative cover and relatively flat topography across the property help to prevent erosion in undisturbed areas. Disturbed lands adjacent to the avoidance areas will be integrated into the natural, undisturbed landform to enhance and complement the existing natural resources.

6. *Proposed new Reclamation Unit PCS-HC-HC(13), Alternative #3, the preferred alternative from the above referenced Alternatives Analysis, includes approximately 105 acres of avoidance area comprised primarily of wetlands to be preserved from mining. Please provide a description of the measures to be taken minimize impacts to these important on-site wetlands, including, but not limited to, measures directed to preventing adverse impacts to groundwater hydrology in the surficial aquifer in order to prevent dewatering these avoided wetland areas.*

   To prevent hydrologic impacts to the undisturbed onsite wetlands within PCS-HC-HC(13), a network of piezometers will be installed along the project boundary and will be continuously monitored to ensure groundwater levels remain at desired elevations. Water levels in the primary drainage ditch will be maintained to sufficiently rehydrate the surficial groundwater. Mined pits will be allowed to partially refill, which increases the surficial groundwater and reduces the cone of depression. Additionally, best management practices will be utilized during construction to prevent water quality impacts to onsite wetlands within the avoidance areas.

Methods to contain turbidity may include the use of staked filter cloth, silt-control polymers, sodding, seeding, mulching, and the deployment of turbidity screens around the immediate project site, as appropriate for each disturbance area. Erosion and turbidity control devices will be inspected and maintained on a regular basis during all phases of mining operations and reclamation. Existing vegetative cover and relatively flat topography across the property help to prevent erosion in undisturbed areas. Disturbed lands adjacent to the avoidance areas will be integrated into the natural, undisturbed landform to enhance and complement the existing natural resources.

7. *Correspondence from the OCULUS website indicates that the application for FDEP approved Conceptual Reclamation Plan (CRP) to incorporate the new reclamation parcels, and other items included in the current applications, has been withdrawn entirely pending completion of additional permit processing relating to the pending ERP and Section 404 applications. Please provide a timeline for submittal of the application for CRP approval to the State*

   Application is being resubmitted 11/04/2022, the day after the delivery of this application to Hamilton County.

8. *Information provided by WSA indicated that a response to the August 11, 2022, FDEP RAI would be submitted on September 2, 2022. However, upon checking with FDEP staff it was found that the information had not been submitted as of September 15, 2022. Please provide an estimated timeframe for the applicant's submittal of additional information to FDEP in response to the August 11, 2022, RAI, and provide this office with a copy of such materials when submitted.*

   Application is being resubmitted 11/04/2022, the day after the delivery of this application to Hamilton County.

9. *State FDEP ERP and Section 404 permitting of the G Lands reclamation units is still not complete and it seems reasonable to expect that significant changes in configurations of these mining and reclamation proposals will occur as that permitting progresses. Additionally, as pointed out above, the CRP application for these same areas has been indefinitely delayed pending resolution of the wetlands activities permitting with the state. The County questions whether it makes sense to pursue the completion of local permitting while the applications for ERP and Section 404 are still pending and the companion application for state CRP approval has been indefinitely delayed. The County would like to avoid going through local permitting more than once, as may occur if additional changes to the mining proposal are made after local approval is completed. Therefore, it is strongly recommended that the applicant request that the current local application process for MMP and SP approval be placed in abeyance while state permitting is either completed, or has progressed to the stage where the specific details of the proposed new mining units are reasonably certain.*

   No lands being applied for in this permit will be disturbed without the formal approval by all agency stakeholders. All documents to the FDEP will be submitted on 11/4/2022, the day after the delivery of this application to Hamilton County.

10. *Concerning the cultural resources issue pertaining to the Sandlin Tract, any final resolution approving the MMP and SP will include a condition requiring preparation and submittal of a cultural resources survey for those areas identified in State Division of Historical Resources Master Site File 8HA-0000-1A.*

    As previously discussed and approved by the Hamilton County Technical Working Group, the areas identified in SHPO master site file 8HA-0000-1A, will be reevaluated with a new third-party cultural resources survey for the lands identified and adjacent to the Sandlin Tract prior to any proposal of disturbance to the site.

Please respond if you have any questions.

Sincerely,

Don Dahlgren
Nutrien

cc: November 3rd, 2022 email subject "[EXT] WSA MMPA and SP Application – Hamilton County 1st RAI"
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