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WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012.

WWALS advocates for conservation and stewardship of the surface waters and groundwater of the Suwannee River Basin and Estuary, in south Georgia and north Florida, among them the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds, through education, awareness, environmental monitoring, and citizen activities.











To: Commander

U.S. Army Corps of Engineers, Jacksonville District Attention: John Fellows 10117 Princess Palm Avenue, Suite 120, Tampa, FL 33610

Re: Questions and call for Public Hearing on SAJ-2019-00480 (JPF)

Commander,

Many questions, among them those in this comment letter, are not addressed by the materials provided with the Public Notice of May 13, 2025, for Permit Application No. SAJ-2019-00480 (JPF) to the U.S. Army Corps of Engineers (USACE) by The Chemours FC, LLC (CHEMOURS, aka THE CHEMOURS COMPANY TT, LLC) to mine on land owned by the Suwannee River Water Management District (SRWMD or the DISTRICT).

On behalf of WWALS Watershed Coalition, Inc., working for clean water in the Suwannee River Basin and Estuary, in which this project resides, I ask for answers to the questions herein and I call for a Public Hearing in which we and others may publicly address and hear responses to these and other open questions about this project.

Where-ever below I request "where can we find a public copy" a satisfactory answer would be to provide a link to the location of such a copy on the Internet, or to return an electronic copy of the relevant document(s) via electronic mail, or, if there is no electronic version, via paper mail to the address on the WWALS letterhead, PO Box 88, Hahira, GA 31632.

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1. Avoidance and Minimization

a. Why is this assertion not enough to reject the permit application? "The applicant stated the following in their application: Due to the nature of mining, the location of the high-grade mineral sands and the locations of the wetlands, impacts to wetlands onsite are unavoidable. Large portions of wetland sloughs running through the Project Area were avoided in order to maintain the existing flow ways connecting onsite wetlands to downstream wetland systems, and flow ways that feed into the Santa Fe River Basin." See the header "AVOIDANCE AND MINIMIZATION:" in the Public Notice for SAJ-2019-00480 (JPF).