



March 19, 2020

Commander, U.S. Army Corps of Engineers, Savannah District  
Attention: Holly Ross  
1104 North Westover Boulevard, Suite 9  
Albany, Georgia, 31707  
holly.a.ross@usace.army.mil

RE: Comment Letter, Georgia River Network  
Permit Application No. SAS-2018-00554, Twin Pines Site, Charlton County, Georgia

Dear Ms. Ross,

Georgia River Network is pleased to provide this letter of comment to the U.S. Army Corps of Engineers (USACE) for Twin Pines Minerals, LLC heavy minerals, mine permit application SAS-2018-00554. Georgia River Network also submitted comments on their original permit application. Twin Pines resubmitted their proposal decreasing the size of the first phase of the mining to 898 acres, and Georgia River Network still stands opposed to this project. This re-submitted permit request to destroy wetlands and creeks in order to mine titanium on a 898-acre "demonstration site" less than 3 miles from the swamp is unacceptable.

Georgia River Network is a statewide, non-profit organization. As a voice of Georgia's rivers, we help everyone enjoy, connect with and advocate for economically vital and clean flowing waterways.

Georgia River Network respectfully requests that, because of the complications due to COVID-19 and the voluminous nature of the application, the U.S. Army Corps of Engineers extend the public comment period for permit application number SAS-2018-00554 by a minimum of ninety days beyond the currently scheduled public comment deadline.

The Okefenokee Swamp, the largest blackwater wetland in North America, is a national treasure, mecca for wildlife watching and home to endangered and threatened species. It serves as the headwaters for the St. Mary's and Suwannee Rivers, two of the most pristine rivers in the southeastern United States.

The Okefenokee National Wildlife Refuge protects a natural area unique not only to the state of Georgia, but also to the world. The refuge is part of the National Water Trail System, one of only 21 designated trails in the U.S. and offers visitors a secluded and isolated wilderness experience. The St. Mary's and Suwannee River both have water trails under development that will be part of Georgia River Network's Water Trail

System. The Okefenokee Wilderness Canoe Trail traverses 10 miles through the Refuge. Trails provide recreational benefits and feed the economies of the area.

The Refuge receives over 650,000 visits a year, generating an estimated annual income of \$64.7 million to the four counties surrounding the Refuge. Twin Pines' proposal to mine for minerals deep into Trail Ridge adjacent to the Okefenokee National Wildlife Refuge could have lasting and irreversible impacts. The company offers no assurances that their mining operations, including the alteration of 475+ acres of wetlands, will protect the swamp from permanent damage or that they will protect the interest of the people who depend on that environment for recreation and economic opportunities.

We are concerned about impacts to the waterways and hydrology of the site. One-third of the mining site drains to streams that discharge to the Okefenokee. The project will cause impacts to 475+ acres of wetlands and 412 linear feet of streams. It is unknown if the water level and holding capacity of the swamp will be altered and how changes may affect connected waterways. Twin Pines plans to eventually mine as much of their 12,000 acre site as possible on Trail Ridge which forms the eastern boundary of Okefenokee swamp. Please see the National Wetland Inventory map attached which shows interconnection of the Swamp and the Ridge with wetlands extending from the swamp onto Trail Ridge.

We also have concern that changes in fire frequency and intensity may result from groundwater alterations.

Several state and federally-listed and federal candidate species may be present on the proposed site, and it is unknown how long the effects of the mining will affect these species and the habitat. The project could permanently impact the habitat for the Gopher Tortoise and species that depend on the tortoise including the Eastern Indigo Snake and Gopher Frog. Birds such as the Wood stork and Red-Cockaded Woodpecker could be affected. In addition, both the Shortnose Sturgeon and Atlantic Sturgeon are present in the St. Mary's River. Under the Endangered Species Act, both species are "Endangered throughout its range".

The combination of noise, light, and other impacts from the project may affect wildlife, star gazing and visitor experience. The wilderness experience would be destroyed.

Mining on Trail Ridge can draw down the water level of the Okefenokee Swamp and dewater headwater wetlands and tributaries and the rivers they feed, destroying natural habitat for federally listed species and providing dry peat fueling uncontrollable fires.

Trail Ridge impounds the Okefenokee Swamp. "It is a natural barrier the influences water retention within the refuge. By mining to depths of 50-'70', mining would ruin the structural integrity of this geologic feature," (Defenders of Wildlife). Digging a hole deeper than the elevation of the swamp and pumping groundwater away from the swamp threaten to draw down the water level. The average water level of the swamp is only 2' deep. People seeking true wilderness pay 647,000 visits annually to canoe and

boat along these shallow water trails. A decrease in water level will make boat access through the swamp impossible.

Georgia River Network concurs with the US EPA comments to USACE stating that mining “will have a substantial and unacceptable impact” on the swamp. We hope USACE will heed the warning from USFWS that this damage to the swamp “may be permanent”. Georgia River Network requests that USACE require an Environmental Impact Statement to protect the physical, chemical and biological integrity of the Okefenokee Swamp and Trail Ridge system.

For the reasons addressed above, we urge the Corps to deny the application or, in the alternative, to prepare an Environmental Impact Statement (EIS) for review and comment. The Okefenokee Swamp is a rare and treasured public resource. The health of that system should not be put at risk by Twin Pines’ current proposal.

We appreciate the NEPA requirement to consider the cumulative effects of the proposed action (the Twin Pines mine) along with other reasonably foreseeable actions in the area in the Draft EIS. Foreseeable mining projects exist within the Twin Pines 12,000-acre mining site and other mining exploration on the Ridge. We understand that precedent is set for considering future mining even if no projects are currently up for permitting. For example, BLM’s DEIS for the proposed Ambler Road in Alaska, <https://www.blm.gov/programs/planning-and-nepa/plans-in-development/alaska/AmblerRoadEIS> is taking into account four exploration projects as reasonably foreseeable mining projects.

Due to the proximity of the proposed mine to the Okefenokee National Wildlife Refuge and Wilderness, the scale of the direct, secondary, and cumulative impacts, and the range of other known and unknown risks, we request that the Corps host a public hearing as part of its permit review process.

I also request that you provide these comments to the Georgia Environmental Protection Division as part of the 401 Water Quality Certification process.

Thank you for your time and consideration of these comments. Please let me know if you need any additional information.

Yours in conservation,



Rena Ann Peck  
Executive Director  
Georgia River Network

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