



September 12, 2019

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 number (SAS-2018-00554). 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 rivers.

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 500+ 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 temporary

impacts to 522 acres of wetlands and 2,454 linear feet of tributaries, and permanent impacts to 65 acres of wetlands and 4,658 linear feet of tributaries. It is unknown if the water level and holding capacity of the swamp will be altered and how changes may affect connected waterways. 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 and visitor experience.

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.

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.

Sincerely,

Dana Skelton
Director of Advocacy and Operations
Georgia River Network

Cc: Rena Peck Stricker, Executive Director, Georgia River Network
Stephen Wiedl, stephen.wiedl@dnr.ga.gov, Georgia Environmental Protection Division