

## **QUESTIONS FOR FISH AND WILDLIFE**

### **Project Description Overview**

- *The letter states “As currently proposed, the mine site is approximately 12,000 acres with the northwest boundary within ½ mile from the Okefenokee NWR boundary and 400 ft from the edge of Okefenokee Swamp and north and west of the St. Mary’s River. The initial project location will be 1.7 miles southeast of the Okefenokee NWR boundary. Operationally, dredging of targeted material (titanium and Zirconium) will extend on average to a depth of 50 foot could reach a depth of to 100 feet. The first mining phase has a proposed project area of 2,414 acres. The rate of mining will be approximately 25-40 acres per month, and backfilled and graded with approximately 30 days following excavation.”*
- It was our office’s understanding that Twin Pines currently owns/leases about 9,500 acres and that the 12,000 acres was the area utilized as a study area for the mining project. Could you confirm this?
- It was our office’s understanding that while the proposed permit area is around 2,400 acres, Twin Pines intends to mine about 1,200 acres. Can you confirm this?
- It was our office’s understanding that while the proposed permit area is around 1.7 miles away from the Okefenokee NWR boundary, the actual mining area is 2.7 miles from the Okefenokee NWR. Can you confirm this?
- If the 2.7 miles number is correct, does Fish and Wildlife have any available research that shows that the Twin Pines mining project will have an impact on the water levels of the Okefenokee Swamp?
- It was our office’s understanding that backfilling would occur within 5 to 10 days of excavation, not 30 days. Can you confirm this?

### Gopher Tortoise

- *The letter states that “While not listed as threatened or endangered under the ESA in Georgia, the gopher tortoise is a candidate species.”*
- Does being designated a candidate species require the same protections as being listed as threatened or endangered under ESA?

### Eastern Indigo Snake

- If no indigo snakes have been observed on the proposed mining site, is there a certain standard or confidence level the FWS utilizes to assess the possibility of occurrence of a particular species?

### General Questions

- It was our office’s understanding that Chemours (formerly Southern Ionics) has been mining in the same general vicinity for many years. Has the Chemours project had a significant impact on any fish or wildlife in the area?
- Similarly, how close was the proposed DuPont mining project to the Okefenokee Swamp in comparison to the Twin Pines proposed project?
- What is Fish and Wildlife’s jurisdiction with regards to the Twin Pines mining project? If there are no federal protected species on the proposed site, does that jurisdiction still apply? Are hydrology impacts included in that jurisdiction?