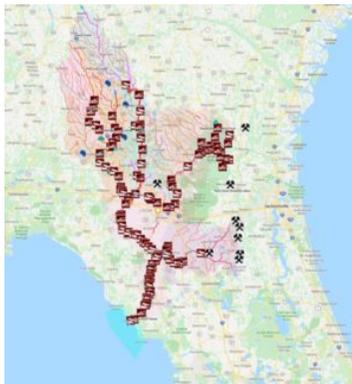


March 19, 2020

To: Col. Daniel Hibner, Commander, U.S. Army Corps of Engineers, Savannah District
Attention: Ms. Holly Ross, holly.a.ross@usace.army.mil,
CESAS-SpecialProjects@usace.army.mil
1104 North Westover Boulevard, Suite 9, Albany, Georgia 31707

Cc: Stephen Wiedl, Wetlands Unit, stephen.wiedl@dnr.ga.gov
Georgia Department of Natural Resources, Environmental Protection Division,
Water Protection Branch, 7 Martin Luther King, Jr. Drive, Atlanta, GA 30334

Re: Applicant: **Twin Pines Minerals, LLC**, Application Number: **SAS-2018-00554**



Dear Colonel Hibner,

Regarding permit application SAS-2018-0054 by Twin Pines Minerals, LLC, of Birmingham, Alabama, Suwannee Riverkeeper for WWALS Watershed Coalition (WWALS) asks the U.S. Army Corps of Engineers (USACE) to extend the public comment period and to hold public hearings, as detailed at the end of this letter.

Review of the current 219-page Application and the hundreds of pages of appendices is not practicable in the thirty days currently specified as a comment period. In particular additional time is needed to review several reports that describe simulation modeling of surface and groundwater. We note that to date these modules have not been peer-reviewed.

No doubt the tens of thousands of public comments received on the previous application by the same Applicant for essentially the same mine indicate a very high level of public concern, as does the opposition by the U.S. Environmental Protection Agency (EPA), the U.S. Fish and Wildlife Service (USFWS), and the Georgia Environmental Protection Division (GA-EPD), and the comment letters from Georgia state Senator William R. Ligon and U.S. Congressman from Florida Al Lawson. Review of Applicant's studies and Application by independent third parties will constitute new information worth holding a public hearing, as will information about relevant mines and watersheds omitted from the Application.

A cursory review of the Application reveals little, if any, mention of the Suwannee River, whose headwaters is the Okefenokee Swamp, nor of the four titanium mines in north Florida for which Twin Pines Minerals along with Chemours is under a Florida Consent Order for a range of violations, nor of the hydrological effects of the phosphate mine in Hamilton County, Florida, downstream on the Suwannee River. The present Application does not appear to include any test wells nor river monitoring for the Suwannee or St. Marys Rivers. The Application also lacks a Reclamation Plan. It seems safe to expect many more issues will be revealed in thorough inspection of the Application. Thus we strongly feel that an extension of the comment period is in the public interest. We and the rest of the public need adequate time to comprehensively review the Application. f

We also feel that all of the issues discovered should be discussed in public hearings in south Georgia and north Florida. The Application claims to be for a "reduced mining area" yet the acreage is approximately 86% of that from the previous Application. The Applicant claims that "reduction" is a significant change in scope of the project. Any significant change in scope is grounds for public hearings. Thus the Applicant's claim of

PO Box 88, Hahira, GA 31632
850-290-2350

wwalswatershed@gmail.com

www.wwals.net

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



“reduction” is yet another reason to hold public hearings.

The novel Coronavirus and the COVID-19 disease it causes is also a serious impediment to meaningful comment in such a short thirty-day timeframe. The World Health Organization (WHO) has declared this virus a pandemic. So far this pandemic has resulted in work-at-home requests from the federal and state governments as part of their declarations of a public health emergency. These actions, while no doubt prudent, disrupt and slow work on anything, including comments on this mining application. If the virus in the U.S. expands exponentially like it has in other countries, as seems likely, further disruption seems likely for an unknown extended period, but quite likely beyond thirty days. Many state and federal government offices have suspended operations or had them slowed due to work-at-home, and it seems unlikely USACE will not also have this happen.

Given the local, state, national, and worldwide significance of the Okefenokee Swamp for its boating, birding, fishing, and nearby hunting, for its ecological diversity and services, and for its economic value to both Georgia and Florida, as well because the Okefenokee Swamp is the headwaters of the Suwannee and St. Marys Rivers, all of which sits above the Floridan Aquifer, from which all of south Georgia and north Florida drinks for human, agriculture and industrial use, adequate public comment time is essential for review of this mining application, and public hearings are needed in south Georgia and north Florida to discuss that review.

There needs to be more than one public hearing, at least one in Georgia and one in Florida, because the Okefenokee National Wildlife Refuge (NWR) extends into Baker County, Florida, as well as Charlton, Clinch, and Ware Counties, Georgia, and that NWR provides more economic benefit to each of Florida and Georgia than any other NWR.

Therefore we request USACE regarding permit application SAS-2018-0054:

- to extend the public comment period for at least another one hundred and twenty (120) days, or no earlier than mid-August 2020, and
- to hold public hearings in south Georgia and north Florida, for example in Folkston, Waycross, and Fargo, Georgia, and in Maclenny and Starke, Florida.

WWALS reserves the right to submit further comments on this Application, up to and beyond the current nominal comment submission deadline.

For the rivers and the aquifer,

John S. Quarterman
Suwannee RIVERKEEPER®
229-242-0102
contact@suwanneeriverkeeper.org
www.suwanneeriverkeeper.org