

Okefenokee Swamp Park

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August 22, 2019

Commander, US. Army Corps of Engineers,

Savannah District

Attn: Ms. Holly Ross, Project Manager

Twin Pines LLC Proposed Mining Project: SAS-2018-005544

Dear Commander:

I am a solo ophthalmologist, practicing in Waycross (near the proposed mining site), serve as Chair of the Okefenokee Swamp Park (OSP) Board of Trustees and offer the following comments on behalf of our Board. Feeling certain that you have already read in other comments about the uniqueness of the Okefenokee (and hoping you have visited recently), these comments will be more focused.

The OSP is a 501(c)(3) non-profit nature center situated at the northern entrance of the Okefenokee National Wildlife Refuge. Along with my board, I serve as a volunteer and have no personal financial conflict of interest in the Twin Pines Mineral proposed project.

Located south of Waycross, the OSP opened in 1946, as the most convenient point of access to the Okefenokee and has provided eco-educational information about the unique aspects of the swamp to millions of visitors from the US and the world since that time.

The northern-most entrance to the Okefenokee has the highest elevation. All of our waters drain south—into the Suwanee River to the Gulf and into



*Headwaters of Suwannee River
Land of the Trembling Earth*

the St. Marys River to the Atlantic Ocean—and the OSP would be more immediately impacted than the other entrances by any mining operation that might inadvertently result in increased drainage of swamp waters.

When the water levels get too low at our entrance, we are no longer able to offer our boat rides into the swamp, which--along with seeing alligators in their natural environment along the way—are major attractions for our visitors, along with our other natural and cultural exhibits.

Also, in our stewardship mission for the Okefenokee, any project that might result in toxic contamination of any part of the swamp—even as the result of uncommon and unpredictable weather occurrences, such as hurricanes over deforested areas with exposed toxic heavy minerals--would adversely affect our ability to attract visitors to our area.

Last year, there were over 600,000 visits to the swamp, with a multi-million dollar rural economic development impact to each of the swamp's three primary entrances (Waycross, Folkston, and Fargo) and the State of Georgia, far out weighing the economic impact of several hundred employees at the proposed mining site.

We are very impressed with the due diligence that has been detailed by the Twin Pines Mineral LLC in their application for a permit to mine heavy minerals near the swamp. We note that the costs for their extensive research have been entirely funded by the corporation.

As a physician, I am aware that new, potentially life-changing medications are developed and extensive studies funded by private pharmaceutical corporations with initial reports of great benefits and few adverse effects. But before these medications are allowed to be prescribed to our patients, they undergo additional and independent rigorously-controlled studies by the FDA.

Sometimes, the independent research confirms the findings of the initial industry-funded research. This is a win-win situation for our patients and the drug companies. But other times, the independent research uncovers additional adverse effects that were not anticipated, identified or risk-quantified by the industry-funded studies, and approval of the medication is not granted.

After considerable deliberation, the Okefenokee Swamp Park, Inc. neither opposes nor supports the proposed mining project, until further independent study is performed.

Therefore, our position is to:

1) Support an independent full Environmental Impact Study (EIS) with the following considerations:

a) An emphasis on potential adverse effects on the hydrology of the lands near the Okefenokee with particular attention to:

b) Whether the proposed mine might threaten the drainage systems of the swamp under unusual conditions, and

c) The potential for toxic contamination of the swamp, especially on its southeastern border, and

d) The variable impacts that mining may have on the swamp under the range of current abiotic conditions, in addition to those projected under future conditions in the instance of droughts or more dynamic environmental climates (decreased or elevated temperatures, more rain, less rain).

e) Following, we request the EIS incorporate a “sensitivity analysis” or other type of assessment with consideration of where impacts may be accelerated beyond that anticipated for current conditions and under which variable conditions, or environmental parameters, that acceleration is most consequential.

2) Support public hearings after such independent research has been conducted, to allow a more-educated decision to move forward, and

3) Oppose the immediate approval of the proposed permit to allow Twin Pines Mineral, LLC to mine heavy mineral deposits as submitted until an independent full EIS brings forth its findings and public hearings occur.

In addition, we request public hearings be held soon with the opportunity for interested parties to question directly the contracted consultants referenced in the application. Because this decision may impact the entire swamp and not just the southeastern corner, there should be at least one public hearing in each of the Okefenokee Gateway Communities: Waycross, Folkston and Fargo.

The Okefenokee Swamp has existed and thrived for thousands of years. We need to take a little more time to evaluate any proposal that might result in a challenge to its current century-long recovery from extensive over-forestry of cypress trees and over-hunting of alligators.

Respectfully,

W. Clark III, MD

S. William Clark III, MD

Chair, Okefenokee Swamp Park Board of Trustees