

cumulative effects of the proposed project are particularly relevant considering the applicant has expressed the intent to mine up to an additional 9,600 acres north of Phase 1. The EPA requests that the applicant provide a detailed analysis of the potential individual, cumulative and secondary effects set forth in 40 CFR Sections 230.10(c) and 230.11, including but not limited to hydrologic effects on the NWR, pursuant to 40 CFR Section 230.40, and the St. Marys River.

Due to the potential for the proposed Twin Pines Minerals mine to adversely affect the hydrology of the Okefenokee NWR, the EPA believes that there is the potential for this project as proposed to cause adverse effects to water quality and the life stages of aquatic life or other wildlife dependent on aquatic systems. The EPA finds that this project, as proposed, may result in substantial and unacceptable impacts to aquatic resources of national importance, as covered in Part IV, paragraph 3(a) of the August 1992 Memorandum of Agreement between the EPA and the Department of the Army regarding CWA Section 404(q).

Thank you for the opportunity to review the permit application submitted by Twin Pines Minerals, LLC. We look forward to working with your staff and the permit applicant. If you have any questions, please do not hesitate to contact me at [REDACTED] or [REDACTED] or have a member of your staff contact [REDACTED] at [REDACTED].

Sincerely,

[REDACTED]

[REDACTED] Director
Water Division

cc: [REDACTED] U.S. Fish and Wildlife Service

[REDACTED] Georgia Environmental Protection Division