

From: [REDACTED]
To: [Ross, Holly A CIV USARMY CESAS \(US\)](mailto:ross.holly.a.civ.usarmy.cesas.us)
Cc: [REDACTED]
Subject: [Non-DoD Source] GaEPD Comments, Request for Comment Extension for SAS-2018-00554, Twin Pines Mineral Mine, Charlton Co.
Date: Thursday, September 12, 2019 6:23:19 PM

To:

U.S. Army Corps of Engineers, Savannah District

Attn: Ms. Holly Ross

1104 North Westover Blvd., Suite 9

Albany, GA, 31707

Holly.a.ross@usace.army.mil <<mailto:Holly.a.ross@usace.army.mil>>

Dear Ms. Ross,

Since the July 12, 2019 Joint Public Notice for the subject Twin Pines Mineral Mine project, the GaEPD Wetlands Unit has reviewed the massive 404/401 application documents provided thus far by project environmental consultant TTL, has attended a July 25, 2019 information session and site visit organized by the U.S. Fish & Wildlife Service/Okefenokee National Wildlife Refuge, has attended an August 13, 2019 public meeting in Folkston, GA as hosted by consultant TTL and applicant Twin Pines Mineral, LLC, has had in-house discussions and briefings here at GaEPD, and has received project comments notably received as of today from the U.S. Environmental Protection Agency, the Georgia River Network and the Suwannee Riverkeeper.

At this time we wish to observe that notable elements of the environmental documentation for this substantive project have not yet been prepared, completed and distributed to us at GaEPD. Appendix F of the 404/401 permit application cites that a series of reports addressing hydrogeologic factors at the Twin Pines site will be completed in the future, but have not yet been completed. Particularly notable among these reports is the ' "Groundwater Models of the Twin Pines Project Area, Trail Ridge, Georgia" – This report will document the groundwater models produced to evaluate the pre-mining conditions, the impact of mining activities on groundwater flow, and the post-mining groundwater conditions.' Understanding that groundwater hydrologic effects associated with the Twin Pines project have been a central concern expressed by federal resource/regulatory agencies, NGOs (e.g. the Suwannee Riverkeeper and Georgia River Network), and the public at large, we respectfully submit that the 404/401 permit application as submitted thus far is not complete since it lacks full information and findings regarding hydrogeologic factors on site and post-project effects to hydrogeology/groundwater. We feel that it is inappropriate and premature to close the project comment window when such notable elements of the environmental documentation for this project have not yet been made available, documentation which we at GaEPD judge to be important to our review of this project.

Thank you for your consideration of this matter.