

# SOUTHERN ENVIRONMENTAL LAW CENTER

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## VIA EMAIL

Col. Daniel Hibner  
U.S. Army Corps of Engineers  
Savannah District  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
Attn: holly.a.ross@usace.army.mil

Re: Permit Application No. SAS-2018-00554

Dear Colonel Hibner:

Twin Pines Minerals, LLC is seeking permission to operate a heavy mineral sand mining facility on approximately 12,000 acres of land in Charlton County, Georgia. The application demands heightened scrutiny for the following reasons:

- The proposed 12,000-acre mine could destroy the integrity of the iconic Okefenokee Swamp located next door.
- At full buildout, the proposed surface mine would eliminate thousands of acres of wetlands and tens of thousands of linear feet of stream, some of which flow into the Swamp.
- To our knowledge, the Corps' Savannah District has not authorized a private company to engage in destruction of this magnitude in recent history.
- Over 20,000 local, regional, and national organizations and individuals have written comments urging the Corps to deny Twin Pines' permit.
- Despite the scale of the project and the enormity of the risks, Twin Pines has not adequately studied the mine's potential impacts.

On behalf of Defenders of Wildlife (which prepared the Endangered Species Act and National Refuge Act sections of these comments), Altamaha Riverkeeper, Environment Georgia, Flint Riverkeeper, Georgia River Network, National Wildlife Refuge Association, Ogeechee Riverkeeper, One Hundred Miles, Savannah Riverkeeper, Satilla Riverkeeper, Sierra Club, St. Marys EarthKeepers, Suwannee Riverkeeper, Wilderness Society, and Wilderness Watch, we urge the Corps to deny the application or, in the alternative, to prepare an Environmental Impact Statement for review and comment.