

rate of 25 to 40 acres a month across the site, the leftovers, or tailings, would be stockpiled then dumped back into open mining pits.<sup>8</sup> Twin Pines would then contour the filled part of the cut and cover it with topsoil.<sup>9</sup> In the drier areas, Twin Pines would plant pine trees. In the wetter area, Twin Pines would attempt to create wetlands and streams to offset what Twin Pines refers to as “temporary impacts.”

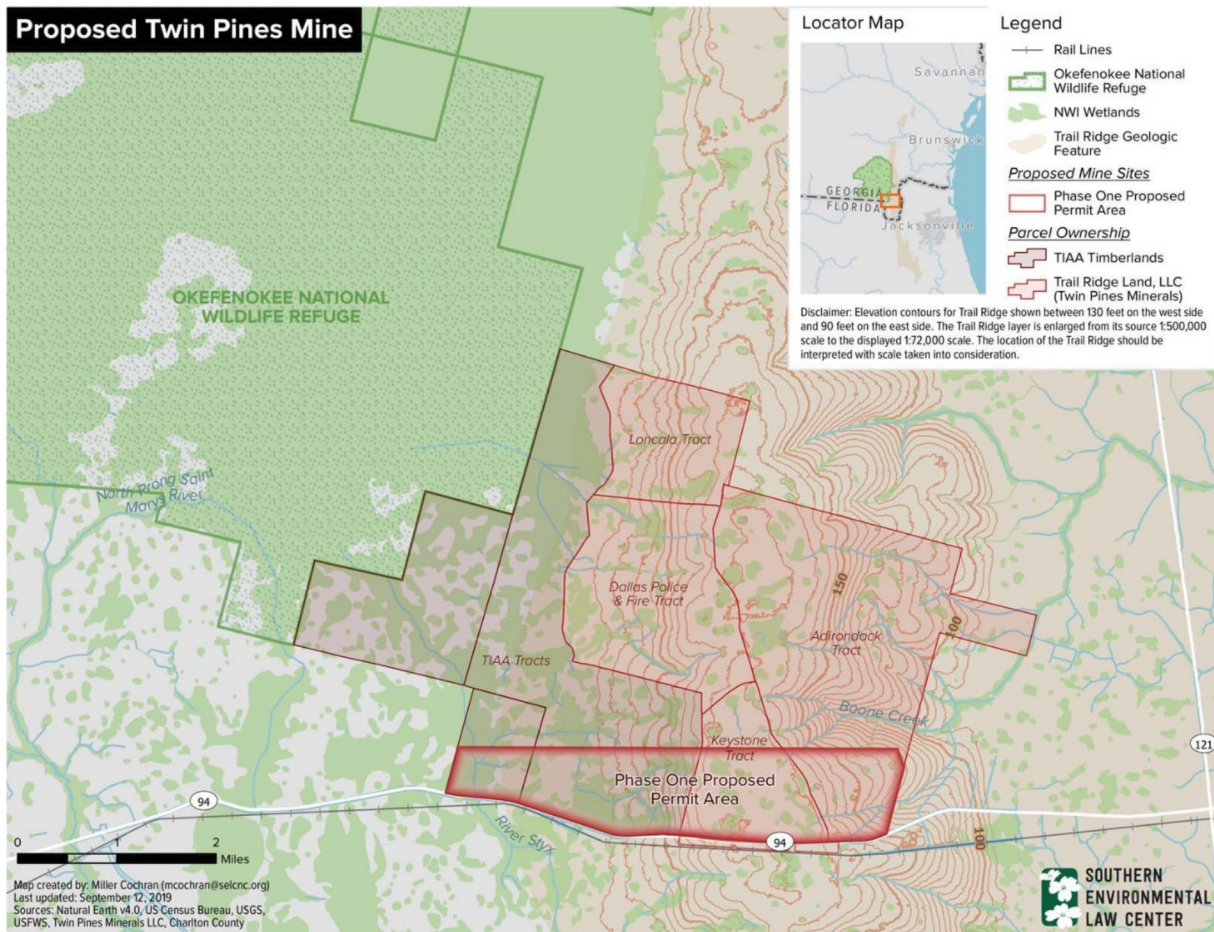


Figure 1: Proposed Twin Pines Mine

As discussed in Section IV, the potential for destroying the integrity of the Okefenokee Swamp is real.<sup>10</sup> As shown in the map above, the project is located on an elevated geological feature known as Trail Ridge which, according to the U.S. Fish and Wildlife Service, “serves as the eastern barrier of the swamp, keeping its waters contained.”<sup>11</sup> Trail Ridge is part of an ancient barrier island complex running from Gainesville, Florida to Jesup, Georgia. A small percentage

<sup>8</sup> Permit Application at 1, 5.

<sup>9</sup> *Id.* at 5.

<sup>10</sup> Mark L. Hutson, Review of Surface Mining Permit Application Proposed Twin Pines Minerals, LLC, Heavy Minerals Mine Saint George, Charlton County, Georgia at 1 (2019) (“Hutson Report”) (attached as Ex. D).

<sup>11</sup> USFWS Letter at 1.