

Bald eagles, a species protected under the Bald and Golden Eagle Protection Act, may occasionally use the Refuge and adjoining habitats.

As described above and elsewhere in these comments, the Corps must consider the potential impact on federally protected species, state-listed species, and plants and animals managed by states in accordance with their federally approved State Wildlife Action Plans. These include at least 22 species of conservation concern that occur on Okefenokee Refuge. Effects analysis should account for the years of investment and effort by federal agencies, states, and partners to conserve and recover these species, including how mining near the refuge could threaten the decades of progress to date.

C. The proposed mine may harm the Okefenokee Swamp, which has important historic, cultural, scenic, and recreational values.

The Okefenokee Swamp supports an array of priority wildlife-dependent recreational and educational opportunities, including wildlife watching and photography, hiking, canoeing, motor boating, hunting, angling, picnicking, and attending naturalist presentations at the refuge visitor center and outdoor classroom. The Service welcomes increasing public visitation to the Refuge at the Suwannee Canal Recreation Area and Stephen C. Foster State Park, which it manages cooperatively with the Georgia Department of Natural Resources. Public use and enjoyment of the Refuge, including its nationally recognized scenic and historic offerings, is a major contributor to local and regional economies, “especially in small towns and rural areas that form ‘Gateway Communities’ adjacent to national wildlife refuges nationwide.”²⁰⁴

The proposed Twin Pines mining operations could have deleterious and irreparable impacts on the Swamp and the Refuge, to the detriment of these public uses that attract hundreds of thousands of visitors per year.²⁰⁵ Even routine mining activities could negatively affect visitation and enjoyment of the Refuge and its environs, including noise, dust, and exhaust generated from the operation and trucks traveling in and out of the area and 24-hour lighting that drives wildlife away and spoils night skies.

The Corps must also consider impacts to cultural and historic resources. The Okefenokee has a rich cultural history, with evidence of Native American occupation dating back to 2500 BCE and a long history of exploration and settlement in the region.

D. Twin Pines overstates the economic benefit of the proposed mine on the community and ignores the economic risks.

1. The application ignores the economic impact of the Okefenokee National Wildlife Refuge.

²⁰⁴ Okefenokee Refuge CCP 2006 at 65.

²⁰⁵ U.S. Fish & Wildlife Serv., *Banking on Nature* 2017 at 29 (June 2019), <https://www.fws.gov/economics/divisionpublications/bankingOnNature/BoN2017/Banking-on-Nature-2017v4.pdf> (attached as Ex. M).