

Ecosystem Service	Gross Economic Value Per Year
Storm Protection	\$27,000,000
Water Quality	\$45,000,000
Commercial Fishing Habitat	\$0
Carbon Storage	\$53,000,000
4 service aggregate	\$125,000,000

Figure 8: Gross Economic Values from Okefenokee Refuge Wetlands per Year²¹²

According to the authors, the estimated values are conservative, in part because the study “only consider[s] benefits to local populations whereas National Wildlife Refuges provide[] benefits to the nation as a whole.” In addition, “because of lack of data, [the] results also leave out other ecosystem services such as biodiversity protection, aesthetic values, and cultural values (plus potentially many more).”²¹³

3. The proposed project is inconsistent with the Joint Comprehensive Plan for Charlton County and the cities of Folkston and Homeland.

The Comprehensive Plan for Charlton County and the cities of Folkston and Homeland recognizes the importance of the Okefenokee Swamp to the regional economy. The Plan, developed jointly after public notice and comment from local citizens, emphasizes the community’s desire to preserve its “sense of place” by “protecting scenic and natural features that are important to defining the community’s character.”²¹⁴ To this end, the plan highlights the local community’s desire to protect its world-renowned resource for cultural and economic reasons. For example, the Plan states a goal for Charlton County “to become a regional center for eco-tourism”²¹⁵ by “target[ing] tourism opportunities presented by the Okefenokee Wildlife Refuge...”²¹⁶

E. The proposed mine does not serve the general needs and welfare of the people.

More generally, the proposed mine does not serve the general needs and welfare of the people. The Okefenokee Swamp is a public resource that should be preserved “for the benefit of

²¹² Douglas Patton et al., National Wildlife Refuge Wetland Ecosystem Service Valuation Model, Phase 1 Report (prepared for Division of Refuges and Division of Economics, U.S. Fish and Wildlife Service) at iii (April 2012), https://www.fws.gov/economics/Discussion%20Papers/USFWS_Ecosystem%20Services_Phase%20I%20Report_04-25-2012.pdf (attached as Exhibit O).

²¹³ *Id.* at 47.

²¹⁴ Joint Charlton County Comprehensive Plan at 54 (April 23, 2015), https://www.fws.gov/economics/Discussion%20Papers/USFWS_Ecosystem%20Services_Phase%20I%20Report_04-25-2012.pdf.

²¹⁵ *Id.* at 9.

²¹⁶ *Id.* at 25.