

application that both the Corps and Twin Pines have made available lacks 24 pages of text.<sup>338</sup> These pages include the conclusion of the report. These pages should be made available to the public for a comment period of 30 days.

## **XI. Request for Public Hearing**

Due to the proximity of the proposed mine to the Okefenokee National Wildlife Refuge and Wilderness, the scale of the direct, secondary, and cumulative impacts, and the range of other known and unknown risks, we request that the Corps host a public hearing as part of its permit review process.<sup>339</sup>

## **XII. Conclusion**

The bottom line is this: Twin Pines has failed to provide critical information to the public, and the information it has provided raises serious concerns that the proposed mine would substantially degrade the Okefenokee Swamp and surrounding ecosystems. Unless Twin Pines can prove that the proposed mine would not have an unacceptable impact—which it has not done—the Corps may not grant a Section 404 permit. Therefore, the Corps should deny the permit application or, at a minimum, prepare an EIS to ensure that the very real risks to one of the world’s most exceptional ecosystems are not overlooked. The exhibits referenced in these comments are available here.

If you have any questions, please feel free to contact us at 404-521-9900 or [bsapp@selcga.org](mailto:bsapp@selcga.org). Thank you for considering this request.

**[Signatures on following page]**

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<sup>338</sup> Keystone Cultural Review at 41-64.

<sup>339</sup> The Corps anticipated the potential need for a public hearing in its initial issue paper and committed to “host Public Meetings and/or Public Hearings as part of our review of an application” if necessary. USACE Issue Paper at 1.