

“reduction” is yet another reason to hold public hearings.

The novel Coronavirus and the COVID-19 disease it causes is also a serious impediment to meaningful comment in such a short thirty-day timeframe. The World Health Organization (WHO) has declared this virus a pandemic. So far this pandemic has resulted in work-at-home requests from the federal and state governments as part of their declarations of a public health emergency. These actions, while no doubt prudent, disrupt and slow work on anything, including comments on this mining application. If the virus in the U.S. expands exponentially like it has in other countries, as seems likely, further disruption seems likely for an unknown extended period, but quite likely beyond thirty days. Many state and federal government offices have suspended operations or had them slowed due to work-at-home, and it seems unlikely USACE will not also have this happen.

Given the local, state, national, and worldwide significance of the Okefenokee Swamp for its boating, birding, fishing, and nearby hunting, for its ecological diversity and services, and for its economic value to both Georgia and Florida, as well because the Okefenokee Swamp is the headwaters of the Suwannee and St. Marys Rivers, all of which sits above the Floridan Aquifer, from which all of south Georgia and north Florida drinks for human, agriculture and industrial use, adequate public comment time is essential for review of this mining application, and public hearings are needed in south Georgia and north Florida to discuss that review.

There needs to be more than one public hearing, at least one in Georgia and one in Florida, because the Okefenokee National Wildlife Refuge (NWR) extends into Baker County, Florida, as well as Charlton, Clinch, and Ware Counties, Georgia, and that NWR provides more economic benefit to each of Florida and Georgia than any other NWR.

Therefore we request USACE regarding permit application SAS-2018-0054:

- to extend the public comment period for at least another one hundred and twenty (120) days, or no earlier than mid-August 2020, and
- to hold public hearings in south Georgia and north Florida, for example in Folkston, Waycross, and Fargo, Georgia, and in Maclenny and Starke, Florida.

WWALS reserves the right to submit further comments on this Application, up to and beyond the current nominal comment submission deadline.

For the rivers and the aquifer,

John S. Quarterman
Suwannee RIVERKEEPER®
229-242-0102
contact@suwanneeriverkeeper.org
www.suwanneeriverkeeper.org