

September 27, 2021

To: TwinPines.Comment@dnr.ga.gov

Cc: Mark Williams, Commissioner, GA-DNR

Re: Mining moratorium: NWPR WOTUS and Army Corps on Okefenokee mine site

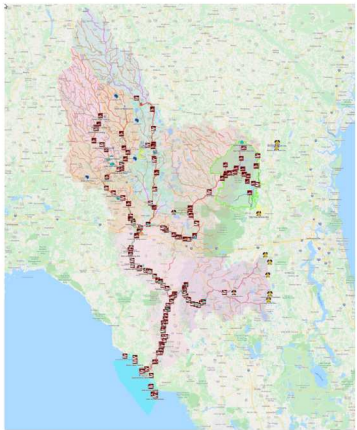
Several recent events combine as evidence that the Georgia Environmental Protection Division (GA-EPD) would do well to impose a moratorium on all mining permits at least until the implications become clear of the recent court ruling to revoke last year's changes to the Waters of the U.S. (WOTUS) by the U.S. Environmental Protection Agency (EPA).



Recent further questions by GA-EPD to the miners about their permit applications from the mesh with concerns Waterkeeper Alliance and Suwannee Riverkeeper have with the inadequate decision last year by the U.S. Army Corps of Engineers (USACE) to abdicate oversight over the mine site within miles of the Okefenokee Swamp. Both those comments and the USACE decision are related to WOTUS. EPA and USACE have halted implementation of the 2020 Navigable Waters Protection Rule (NWPR) upon which the USACE decision was based.

**GA-EPD repeated questions about streams and the mine site**

In its September 10, 2021, Permit Coordination Letter,<sup>1</sup> GA-EPD asked about water draining into the Floridan Aquifer or into rivers, or water moving in the other direction.



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WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.

Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.



Exhibit I Modeling the GW Flow System Comments James L. Kennedy Ph.D., P.G.

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**Page 8:** Explicitly explain what use of the drains versus rivers means in the model. In MODFLOW drains can receive water from the modeled aquifer but cannot recharge the modeled aquifer. A river can both receive water from the modeled aquifer and discharge water to the modeled aquifer.

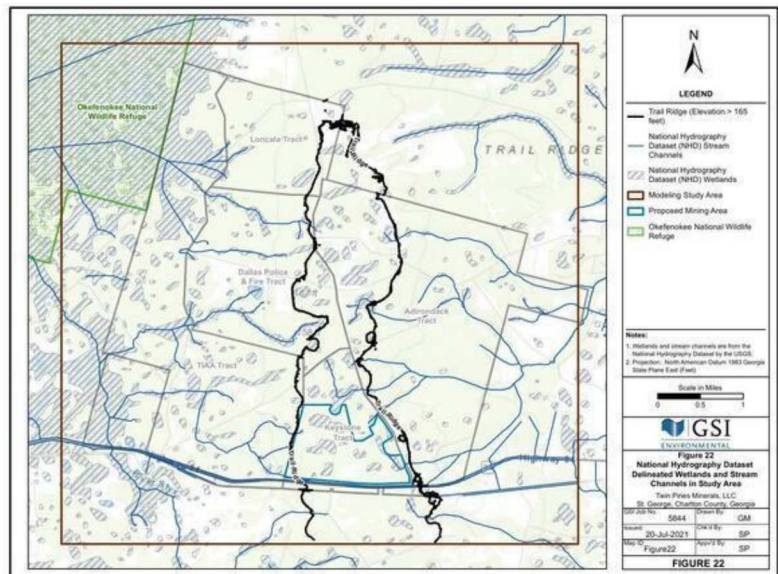


Figure 22. Wetlands and Stream Channels

<sup>1</sup> EPD Permit Coordination Letter, September 10, 2021,

<https://epd.georgia.gov/document/document/epd-permit-coordination-comments-91021pdf/download>