



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard

Atlanta, Georgia 30345

OCT 08 2019

In Reply Refer To:
FWS/SAG-MB/ES

Colonel Daniel Hibner
U. S. Army Corps of Engineers
Savannah District - Regulatory Division
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640
Attention: Ms. Holly Ross

Re: USFWS File Number 2019-0650

Dear Colonel Hibner:

The U. S. Fish and Wildlife Service (Service) has reviewed the U. S. Army Corps of Engineers (USACE) Joint Public Notice (JPN) SAS-2018-00554 and associated information concerning the proposed Twin Pines Mine Project (project) in Charlton County, Georgia. We appreciate the efforts expended by USACE to include the extensive supporting information in the JPN to aid in the review. Because of the location, scale, and associated activities, we have concerns that the proposed project may pose risks to the Okefenokee National Wildlife Refuge (OKENWR) and the natural environment. We provide the following as information on issues to be considered in your decision on the level of environmental review that is appropriate for this proposed project. Our comments are submitted in accordance with provisions of the Endangered Species Act (ESA) of 1973, as amended; (16 U.S.C. 1531 *et seq.*) and the National Environmental Policy Act of 1969, as amended; (42 U.S.C. 4321 *et seq.*).

Project Description Overview

As currently proposed, the mine site is approximately 12,000 acres with the northwest boundary within ½ mile from the Okefenokee NWR boundary and 400 ft from the edge of Okefenokee Swamp and north and west of the St. Mary's River. The initial project location will be 1.7 miles southeast of the Okefenokee NWR boundary. Operationally, dredging of targeted materials (titanium and zirconium) will extend on average to a depth of 50 foot, but could reach a depth of up to 100 feet. The first mining phase has a proposed project area of 2,414 acres. The rate of mining will be approximately 25-40 acres per month, and backfilled and graded within approximately 30 days following excavation. Planting will occur during the appropriate planting season.

The mining would occur on Trail Ridge. Geologically, Trail Ridge is one of the historical sand beachfronts that are inland and generally parallel to the current beachfront of coastal Georgia. To the west, or inland of a portion of Trail Ridge is a large depression; the Okefenokee Swamp.