

other commensal species would not be able to; therefore becoming entombed and die, and leave little to no evidence of what has occurred. The Service recommends that the mining community, including this applicant, should investigate the following question; 1) once the landscape has been restored following mining, how much time is needed before a) gopher tortoises will resume burrowing, and b) how sustainable are newly created burrows in these post-restoration project areas. The Service recommends that such studies be conducted as part of the permitted project.

The gopher frog (*Lithobates capito*) (another candidate species) was documented during species surveys of the site. The gopher frog is one of the commensal species that utilizes gopher tortoise burrows. It also utilizes shallow isolated wetland habitats in part of its lifecycle. These wetlands appear to be present in the proposed mining area. The mining will homogenize the soil in these areas and would likely cause the hydrology of these isolated ponds to change permanently. This would likely permanently destroy the habitat of these amphibians.

Other Okefenokee National Wildlife Refuge Related Concerns

The Refuge includes a designated National Wilderness area where solitude is emphasized. Potential light, noise, dust, smoke, and exhaust pollution from operations may affect the wilderness resource itself, Refuge visitors' experiences, and natural inhabitants and ecosystems/environments.

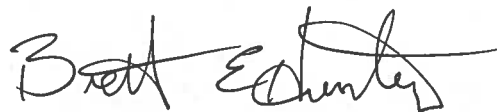
We appreciate the opportunity to provide comments on this project. If you have any further questions, please contact Donald W. Imm, Field Supervisor, Georgia Ecological Services at 706-208-7501.

Sincerely yours,



Catherine Phillips
Assistant Regional Director,
Ecological Services

Acting for



David Viker
Regional Chief,
National Wildlife Refuge System

for

cc: Eric Somerville, EPA, Athens, Georgia
Bradley Smith, GADNR-EPD, Brunswick, Georgia
Jason Lee, GADNR-WRD, Brunswick, Georgia
Michael Lusk, Okefenokee Refuge Manager, USFWS Folkston, Georgia