

This statement is the subject of an active lawsuit:¹⁴ "There are no jurisdictional wetlands on the proposed mine property."¹⁵

No mention of Mercury

The only mention of mercury in the MLUS seems to be in one file with groundwater sampling results.¹⁶ We see no plan in the MLUS for what to do when mercury is found.

Relatively high rates of atmospheric mercury deposition in and around the swamp have been well documented,¹⁷ especially from coal power Plant Scherer.¹⁸ Land disturbance from mining activities also has the potential to mobilize toxic mercury that has accumulated in soils in and around the swamp. It is also well documented that distributing soil that has accumulated this highly toxic element will increase its mobility.¹⁹ In turn further contamination of fish tissue is likely and will result in increased risk from fish consumption. Current advisories already recommend limiting meals of fish caught in the region to one meal per month.²⁰

WWALS first raised this issue in its comment letter to the Army Corps on September 12, 2019.²¹ The rest of the text italicised below in this subsection is verbatim from that earlier comment letter.

There has been a monitoring station with the refuge since 1997. Data from this station has shown that the rates of mercury deposition in the ONWR are some of the highest reported across the continental USA (see Figures 3 and 4).

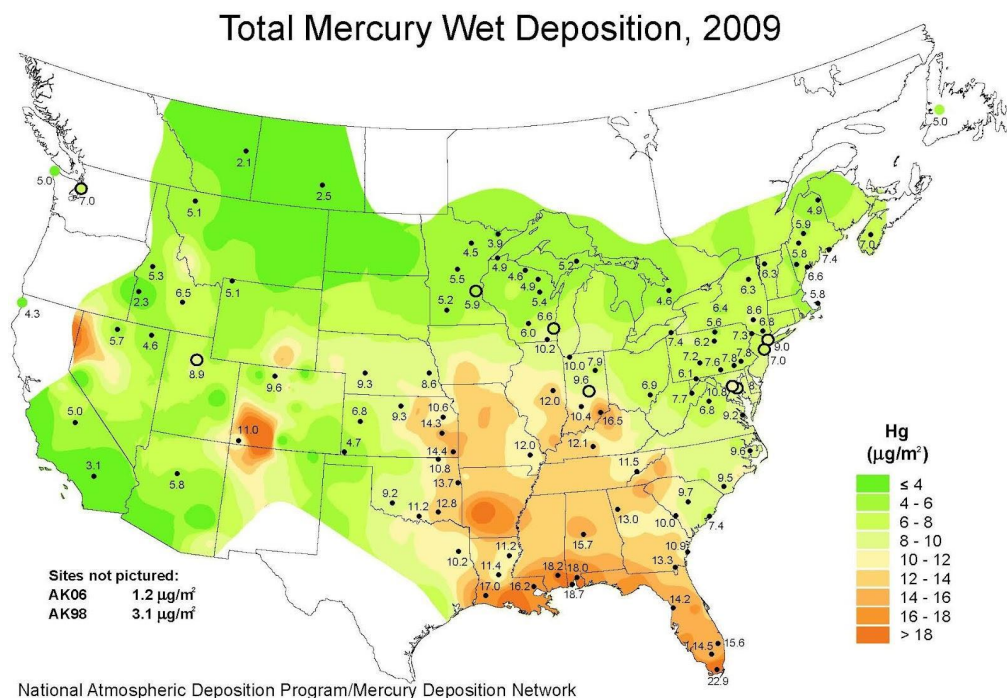


Figure 3: Total Mercury Wet Deposition, 2009 (NADP) CC by 4.0²²

The toxic impacts of mercury are well known. This includes accumulation of a highly toxic form of the element in fish tissue. This is why there is a health advisory on fish consumption in the region²³ and Total Maximum Daily Load (TMDL) assessments have been made on both the St. Mary's²⁴ and Suwannee Rivers.²⁵ A detailed review of the published scientific literature (Grigal, 2003)²⁶ has indicated that in wetland environments such as those in the proposed mining area, mercury deposited from the atmosphere tends to be geochemically immobilized in soils and sediments. The same review has also reported that exposure of mercury contaminated soil and sediment to air can release the mercury making it more mobile and increasing potential for toxic impacts. In the application the miners have reported that they remove the topsoil from the mining site and return it after mining is complete. In both cases soils will be exposed to the atmosphere and this will likely change the mercury residing in the soil to forms which are more mobile, leachable, and bioavailable. Adverse impacts to water quality