



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 12 2019

Colonel Daniel H. Hibner
District Engineer
Attn: Ms. Holly Ross
U.S. Army Corps of Engineers
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3640

Subject: SAS-2018-00554, Twin Pines Minerals LLC heavy mineral sands mine in
Charlton County, Georgia

Dear Colonel Hibner:

The U.S. Environmental Protection Agency has reviewed the Joint Public Notice SAS-2018-00554 announcing a Clean Water Act (CWA) Section 404 permit application submitted by Twin Pines Minerals, LLC to mine heavy mineral sands on a 2,414-acre property near St. George, Georgia in Charlton County. After issuing the initial public notice on July 12, 2019, the U.S. Army Corps of Engineers, Savannah District (Corps) issued a second public notice on July 19, 2019, that included the complete permit application and extended the comment period to September 12, 2019.

Twin Pines Minerals, LLC anticipates its heavy mineral sands mine will be 12,000 acres mined in approximately 1,000-acre parcels over 30 years. The public notice describes the proposed work in Charlton County as Phase 1. The PN indicates that the discharge of dredged or fill materials associated with the Phase 1 project as proposed would directly impact 587 acres of wetlands and 7,112 linear feet of streams.

The western boundary of the 12,000-acre total mine area abuts the Okefenokee National Wildlife Refuge (NWR), which is managed by the U.S. Fish and Wildlife Service (U.S. FWS). The Okefenokee NWR was established in 1937 and encompasses over 90 percent of the 438,000-acre Okefenokee Swamp. According to the U.S. FWS, the Okefenokee Swamp includes eight different habitat types: shrub swamp, mixed cypress forest, prairies, pure cypress forest, swamp islands, blackgum forest and bay forest. Within the Okefenokee NWR itself, 233 species of birds (including three federal endangered species) have been identified, as well as 49 species of mammals, 64 species of reptiles, 37 species of amphibians and 39 species of fish.

The Okefenokee NWR is the largest NWR in the eastern United States, and over 350,000 acres of the Okefenokee NWR is National Wilderness Area. It is one of fewer than 600 National Natural Landmarks designated by the U.S. Secretary of the Interior nationwide, is designated a Wetland of International Importance per the Ramsar Convention and has been placed on the U.S.