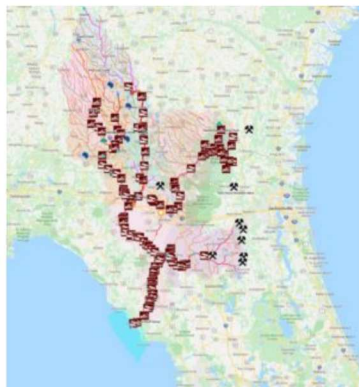


March 19, 2020

To: Col. Daniel Hibner, Commander, U.S. Army Corps of Engineers, Savannah District
Attention: Ms. Holly Ross, holly.a.ross@usace.army.mil,
CESAS-SpecialProjects@usace.army.mil
1104 North Westover Boulevard, Suite 9, Albany, Georgia 31707

Cc: Stephen Wiedl, Wetlands Unit, stephen.wiedl@dnr.ga.gov
Georgia Department of Natural Resources, Environmental Protection Division,
Water Protection Branch, 7 Martin Luther King, Jr. Drive, Atlanta, GA 30334

Re: Applicant: **Twin Pines Minerals, LLC**, Application Number: **SAS-2018-00554**



Dear Colonel Hibner,

Regarding permit application SAS-2018-0054 by Twin Pines Minerals, LLC, of Birmingham, Alabama, Suwannee Riverkeeper for WWALS Watershed Coalition (WWALS) asks the U.S. Army Corps of Engineers (USACE) to extend the public comment period and to hold public hearings, as detailed at the end of this letter.

Review of the current 219-page Application and the hundreds of pages of appendices is not practicable in the thirty days currently specified as a comment period. In particular additional time is needed to review several reports that describe simulation modeling of surface and groundwater. We note that to date these modules have not been peer-reviewed.

No doubt the tens of thousands of public comments received on the previous application by the same Applicant for essentially the same mine indicate a very high level of public concern, as does the opposition by the U.S. Environmental Protection Agency (EPA), the U.S. Fish and Wildlife Service (USFWS), and the Georgia Environmental Protection Division (GA-EPD), and the comment letters from Georgia state Senator William R. Ligon and U.S. Congressman from Florida Al Lawson. Review of Applicant's studies and Application by independent third parties will constitute new information worth holding a public hearing, as will information about relevant mines and watersheds omitted from the Application.

A cursory review of the Application reveals little, if any, mention of the Suwannee River, whose headwaters is the Okefenokee Swamp, nor of the four titanium mines in north Florida for which Twin Pines Minerals along with Chemours is under a Florida Consent Order for a range of violations, nor of the hydrological effects of the phosphate mine in Hamilton County, Florida, downstream on the Suwannee River. The present Application does not appear to include any test wells nor river monitoring for the Suwannee or St. Marys Rivers. The Application also lacks a Reclamation Plan. It seems safe to expect many more issues will be revealed in thorough inspection of the Application. Thus we strongly feel that an extension of the comment period is in the public interest. We and the rest of the public need adequate time to comprehensively review the Application. f

We also feel that all of the issues discovered should be discussed in public hearings in south Georgia and north Florida. The Application claims to be for a "reduced mining area" yet the acreage is approximately 86% of that from the previous Application. The Applicant claims that "reduction" is a significant change in scope of the project. Any significant change in scope is grounds for public hearings. Thus the Applicant's claim of

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WWALS is an IRS 501(c)(3)
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