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January 27, 2020

Colonel Daniel H. Hibner
U.S. Army Corps of Engineers, Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401

Re: Letter of Concern regarding Twin Pines Minerals, LLC mining proposal

Dear Colonel Hibner,

I am writing to express my concern for the 12,000-acre heavy mineral sands mine in Charlton County proposed by Twin Pines Minerals, LLC. While my Georgia Senate District 3 does not extend to the location of the proposed mine, I represent Georgia citizens who live downstream of the proposed mine site, and I represent many citizens who deeply value the swamp and the nature-based economy of the region.

The Okefenokee Swamp is a national treasure and an iconic Georgia landmark that has supported generations of families. Today the swamp is a very popular destination, providing refuge and rest for visitors and wildlife. It is the headwaters of the St. Marys Rivers, the watershed that covers much of my Senate District. The swamp is internationally recognized and nationally important. The Okefenokee National Wildlife Refuge was designated in 1937 and enjoys over 600,000 visitors annually. I join more than 20,000 citizens, businesses and organizations, along with the U.S. Fish and Wildlife Service (U.S. F&WS), U.S. Environmental Protection Agency (U.S. EPA), and Georgia Environmental Protection Division (GA EPD) to express my concern for the long-term impacts that may result from the proposed mine.

After reviewing the permit application material and listening to the concerns of my constituents, I do not recommend that the U.S. Army Corps of Engineers (U.S. ACOE) approve Permit Application No. SAS-2018-00554 unless we can reasonably be assured that the Okefenokee would not be adversely affected. As stated in the letter sent to the U.S. ACOE from the U.S. EPA on September 12, 2019, “The EPA finds this project, as proposed, may result in substantial and unacceptable impacts to aquatic resources of national importance.” Additionally, the GA EPD noted in communications with the U.S. ACOE (also dated September 12, 2019) that “notable elements of the environmental documentation for this substantive project have not yet been prepared, completed and distributed.”

The Okefenokee Swamp and the landscape around the Twin Pines’ property are hydrologically rich. As such, it is critical that thorough studies and detailed models be finalized to determine how mining activities and post-mine restoration will alter surface and ground water flows.

Science must guide decisions that affect our swamp and the national wildlife refuge. These studies and models should be built around ample data sets that capture the spectrum of wet and dry periods of South Georgia weather. After critical review, the studies must demonstrate, beyond a reasonable doubt that no harm will come to the swamp as a result of Twin Pines' mining operations. Our state cannot risk lasting damage to the national treasure that is the Okefenokee Swamp.

The application currently before the U.S. ACOE is described as Phase 1 of the project, but Twin Pines has definite plans to mine all 12,000 acres of their property over the next 30 years. The decision to allow Phase 1 to proceed with so little science, study, and analysis will set a poor precedent for future permits on this and other Trail Ridge properties where mining may occur.

At the very least, the U.S. ACOE must require that an Environmental Impacts Statement (EIS) be conducted prior to any mining at Twin Pines property or other properties in the hydrologically sensitive area of Trail Ridge next to Okefenokee Swamp. Only through an EIS will the agency and concerned citizens understand how the proposed mine will affect the natural and physical environment.

Beyond the federal and state permits currently being considered, I recommend that the many agencies engaged and responsible for protecting the environment and the health of Georgians collaborate with landowners, residents of Charlton County, businesses, and interested parties to consider ways of protecting the long-term integrity of the Okefenokee Swamp. Land conservation incentives, best practices for using the sensitive land, and other options exist that can protect the swamp and the nature-based economy it supports. For example, classifying the area adjacent to the swamp as a priority for conservation incentives and a zone where no or limited mining can occur may be an effective method of protecting the integrity of the Okefenokee Swamp and its associated economy.

In closing, the Okefenokee Swamp is a national natural landmark and state treasure. It is a landscape that defines the communities and families of Southeast Georgia. I reiterate my opinion that the U.S. ACOE should deny the permit requested by Twin Pines Minerals, LLC as it is currently submitted. A greater investment in scientific analysis and investigation is needed to ensure, beyond a reasonable doubt, that the proposed mining operation and others to come will not cause harm to the swamp.

I look forward to working with my fellow Georgians, federal officials, and state/federal management agencies to find a way to conserve the integrity of the Okefenokee Swamp and to find land use investments that are compatible with the nature-based economy of Southeast Georgia.

Sincerely,



William T. Ligon, Jr.

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