

March 9, 2023

To: U.S. Waterkeepers

Re: Please support the Okefenokee Swamp over a strip mine for white paint

Waterkeeper colleagues,

Action is needed to protect the Okefenokee Swamp, the largest blackwater swamp in North America and headwaters of the St. Marys and Suwannee Rivers, located in southeast Georgia. Twin Pines Minerals, LLC (TPM) is applying for permits from the Georgia Environmental Protection Division (EPD) to mine nearly 580 acres for titanium dioxide: only 3 miles from the Okefenokee Swamp and 5 miles from the main stem St. Marys River.

These permits are just for their phase 1 demonstration mine that the miners say will show that their plan can be conducted safely while protecting the environment. But miners don't stop with just one bite, as evidenced by other titanium TiO₂ mines in Florida and Georgia, on the same Trail Ridge as this site.

TPM's original application submitted to the US Army Corps of Engineers back in 2019 spoke of 12,000 acres to be mined over 8 years.¹ Some of that turned out to be owned by Teachers Insurance and Annuity Association of America (TIAA), who insisted TPM remove it from their application.² TPM as Trail Ridge Land LLC still owns land extending north of the proposed mine site adding up to almost 8,000 acres, coming to within 400 feet of the Okefenokee Swamp, as the U.S. Fish and Wildlife Service warned, also in 2019.³ The miners withdrew their original application and reapplied for only the 582 acres, small enough that they could claim the site had no jurisdictional wetlands. By so doing, they violated a Federal policy against "segmenting" permit applications. So, the planned mining area has been in constant flux in response to permitting, legal, and marketing considerations.

People from around the world visit the Okefenokee National Wildlife Refuge (ONWR) for its paddle trails, dark skies, and wilderness beauty. According to the U.S. Fish and Wildlife Service, the ONWR provides more economic benefit to each of Georgia and Florida than any other NWR.⁴ The southeastern corner of the swamp feeds the St. Marys River which results in the river having zero flow during droughts and flooding during heavy rains. The St. Marys River is pristine due to the waterfront being entirely privately owned by timber plantations, conservation districts, and private citizens. With white sandy shores, blue skies, green trees, and the darkest blackwater, you cannot but be in awe of this spectacular place.

¹ The original 2019 TPM permit notice from the U.S. Army Corps of Engineers:

<https://wwals.net/pictures/2019-07-12--tpm-usace/SAS-2018-00554-Charlton-0712-SP-HAR.pdf>

And the complete original 2019 TPM permit application:

<http://www.wwals.net/pictures/2019-07-12--tpm-usace/Twin-Pines-Individual-Permit-Application--complete.pdf>

² Mary Landers, SavannahNow.com, September 26, 2020, Regulators seek no remedy for false claims on Okefenokee mining permit request,

<https://www.savannahnow.com/story/news/2020/09/26/regulators-seek-no-remedy-for-false-claims-on-okefenokee-mining-permit-request/114874778/>

³ U.S. Fish and Wildlife Service to Georgia U.S. Senator David Perdue, November 21, 2021, "The initial project location is the farthest that mining activity would be from the Okefenokee National Wildlife Refuge (NWR) boundary and the Okefenokee Swamp. Any additional mining that occurs within the 12,000-acre permit area would be closer to the refuge. The northwest boundary of the permit area is within a half mile from the refuge boundary and 400 feet from the edge of the Okefenokee Swamp." <https://wwals.net/?p=52533>

⁴ U.S. Fish & Wildlife Service, June 2019, Banking on Nature 2017: The Economic Contributions of National Wildlife Refuge Recreational Visitation to Local Communities

https://www.fws.gov/sites/default/files/documents/USFWS_Banking_on_Nature_2017_0.pdf

The mine is located within the St. Marys River watershed with the hydrologic divide at the mine site impacting both the swamp and upper St. Marys River to the west and the main stem of the St. Marys to the east.

There is no wall in the Okefenokee Swamp between the St. Marys and Suwannee River watersheds. Any change in the level or composition of the swamp water will affect all of the Okefenokee Swamp, and the Suwannee River, which drains about 85% of the swamp. Lower water levels would mean more difficult boating on the paddle trails and motor boat tour routes, affecting the economy as well as wildlife. There is scientific evidence that the swamp exchanges surface waters with underground waters all the way down to the Floridan Aquifer.⁵

All of south Georgia and north Florida drinks from that underground water, which also feeds the numerous springs along the Suwannee, Santa Fe, Withlacoochee, and other Rivers in the Springs Heartland of Florida. Any lowered water level or dewatering of the surface around the Swamp increases the risk of fires. The 2007 Bugaboo fire spread smoke west across the Suwannee River Basin, causing respiratory distress 80 miles away in Quitman, continuing 450 miles to Meridian, Mississippi. Southwards the smoke closed I-75 and went 370 miles to Fort Lauderdale, Florida. North it went 250 miles to Atlanta. What happens around the Okefenokee Swamp can have widespread effects.

TPM has a bad environmental track record eliminating confidence that they can do what they are saying without harming the surrounding ecosystem. TPM, while processing tailings at two of the four Chemours titanium mines on Trail Ridge in north Florida, spilled wastewater during Hurricane Irma. Because of that and other infractions, TPM is still under a Florida Consent Order.⁶ Yet Twin Pines promises not to spill wastewater next to the Okefenokee Swamp or surrounding waterways. The people behind TPM also started two biomass plants in north Georgia, one of which caused a massive fish kill, and both of which caused the state to pass a law to stop them burning railroad ties. TPM proposes to use multiple experimental techniques to minimize environmental impacts including draglines, evaporators, and placing a layer of bentonite horizontally to name a few. This mine is not worth risking the swamp and its rivers or underground waters.

Although this is a state permit issue, we, the Waterkeepers of Georgia, are asking all Waterkeepers to:

1. File public comment expressing concerns and opposition for this mine specifically on the Mining Land Use Plan. <https://epd.georgia.gov/twin-pines>
2. Ask your elected officials to file comments to Georgia EPD in support of preserving the Okefenokee Swamp and surrounding waterways.
3. Ask your Congress members to urge the U.S. Interior Department to list the Okefenokee National Wildlife Refuge as a candidate for designation as a UNESCO World Heritage Site.⁷

Please do whichever of these things you can do.

⁵ Kitchens, Susannah; Rasmussen, Todd C., University of Georgia, April 1994, Hydraulic Evidence For Vertical Flow From Okefenokee Swamp To The Underlying Floridan Aquifer In Southeast Georgia <https://smartech.gatech.edu/handle/1853/44003>

⁶ Consent Order, Florida Department of Environmental Protection (FDEP) v. Chemours involving Twin Pines Minerals, February 7, 2019 <https://wwals.net/?p=49898>

⁷ Emily Jones, WABE, February 2, 2023, Ossoff, Carter push for Okefenokee UNESCO listing <https://www.wabe.org/ossoff-carter-push-for-okefenokee-unesco-listing/>

Thank you,

John S. Quarterman
Suwannee Riverkeeper



Emily Floore
St. Marys Riverkeeper



S. Gordon Rogers IV,
Riverkeeper and
Executive Director,
Flint Riverkeeper



Damon Mullis
Executive Director and
Riverkeeper
Ogeechee Riverkeeper



Tonya Bonitatibus
Riverkeeper /
Executive Director
Savannah Riverkeeper



Jesse Demonbreun-Chapman
Executive Director &
Riverkeeper
Coosa River Basin Initiative



Chris Bertrand
Satilla Riverkeeper



Fletcher Sams
Executive Director
and Riverkeeper



Jason Ulseth
Chattahoochee
Riverkeeper

