

impact on aquatic resources of national importance.

That “*substantial and unacceptable impact on aquatic resources of national importance*” extends into the state of Florida. As U.S. Congressman Al Lawson of Florida’s Congressional District 5 noted in his comment letter of February 13, 2020, part of the Okefenokee NWR is in Baker County, Florida, and that NWR adjoins the Osceola National Forest and the Osceola Wildlife Management Area. <http://wwals.net/?p=51590> Various Florida Statutes regarding water quality apply to all three of those areas. In addition, the Okefenokee NWR is of great economic importance to the state of Florida. Congressman Lawson added:

If approved, the project would destroy portions of Trail Ridge, which acts as a geomorphological dam, ensuring clean water is stored within the Okefenokee. The U.S. Fish and Wildlife Service fears that mining operations on Trail Ridge could affect the hydrological integrity of the swamp and potentially impair the entire 438,000-acre Okefenokee ecosystem.

The Okefenokee Swamp is the headwaters of the St. Marys River, which forms the eastern border between Georgia and Florida, with half of its watershed in Florida. The Swamp is the headwaters of the Suwannee River, which flows through Florida to the Gulf of Mexico and is the subject of Florida’s State Song. The Suwannee is an Outstanding Florida Water, a legal status which requires proving that a project will not adversely affect it.

https://floridadep.gov/sites/default/files/OFW%20factsheet_0.pdf

As S. William Clark III, MD, noted in his comment letter of August 22, 2019, on behalf of the Okefenokee Swamp Park (OSP) at the headwaters of the Suwannee River near Waycross, Georgia, any change in water level or contamination of the Okefenokee Swamp by the proposed mine would affect the whole Swamp, “*even as the result of uncommon and unpredictable weather occurrences, such as hurricanes over deforested areas with exposed toxic heavy minerals....*” <http://wwals.net/?p=50052> Part of the Okefenokee Swamp is in Florida, and anything that affects the Swamp affects the Suwannee River, which flows through Florida, as well as the St. Marys River, which forms part of the border between Florida and Georgia.

Florida has already imposed legal sanctions on the mining practices of the current Applicant, Twin Pines Minerals (TPM), in a Consent Order by the Florida Department of Environmental Protection (FDEP) against Chemours and TPM for a range of violations at four titanium mines on Trail Ridge in north Florida.

<http://wwals.net/pictures/2018-03-23--fdep-warning-chemours/>

Those north Florida mines have already polluted Alligator Creek and the New River, which flow into the Santa Fe River and thence to the Suwannee River. FDEP needs an opportunity to review and comment on the present mining Application by TPM, regarding potential further contamination of the Suwannee River Basin.

In the WWALS comment letter of September 12, 2019, we spelled out potential effects of TPM’s proposed water withdrawals on the Floridan Aquifer, from which most of south Georgia and north Florida drink, and use for agriculture and industry.

<http://wwals.net/?p=50140> In that letter we also noted research by Prof. Todd Rasmussen of the University of Georgia that indicates that the Okefenokee Swamp interchanges water