



June 28, 2023

To: Jonathan Putnam
Office of International Affairs
National Park Service
1849 C Street NW
Washington, DC 20240

jonathan_putnam@nps.gov
(202) 354-1809

Re: Nominating Okefenokee NWR for UNESCO World Heritage List, Docket Number
[NPS-WASO-OIA-DTS-35557, PPWODIREI0-PIN00IO15.XI0000-234P104215](https://www.nps.gov/wwals/wwals-1809.htm)



Dear Mr. Putnam,

As Suwannee Riverkeeper and for our umbrella organization WWALS Watershed Coalition, Inc., I thank the U.S. for submitting a nomination for the Okefenokee National Wildlife Refuge (ONWR) from the U.S. World Heritage Tentative List (“Tentative List”) to the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage List.

<https://whc.unesco.org/en/tentativelists/5252/>

The vast majority of the Okefenokee Swamp is in the Suwannee River Basin, and some 85% of the outflow of the Swamp goes down the Suwannee River, which continues through Georgia and across Florida, where it is the subject of the state song, to the Gulf of Mexico.

In addition to our previous letter of January 26, 2021 (attached), please accept the comments in the present letter.

Operational Guidelines

Here are a few suggestions for some of the items in the Operational Guidelines

3.1.c. Statement of Integrity:

The ONWR includes 92% of the Okefenokee Swamp and thus includes all elements of Outstanding Universal Value and is of adequate size to represent the features and processes of the property’s significance. The ONWR suffers adverse effects of development: see 4.b (i).

3.1.e. Protection and management requirements

The ONWR has federal legal protections as a Wilderness Area and a National Wildlife Refuge. Further protections are needed to fend off development beyond the boundaries of the ONWR. See 4.b. (i).

4.b (i) Development pressures and management response:

For the second time in twenty years, a titanium dioxide strip mine threatens the Okefenokee Swamp, this time within three miles of the southeast border of the ONWR, organized by coal miners from Alabama. The U.S. Army Corps of Engineers has abdicated oversight, leaving only the Georgia Environmental Protection Division (GA-EPD), standing between the miners and the Swamp. <https://epd.georgia.gov/twin-pines> GA-EPD has received more than 100,000 comments on the five permit applications, the overwhelming majority against the mine. The ONWR Manager testified in uniform for the Swamp and against the mine in a Georgia legislative hearing about a bill that would prohibit further mining on Trail Ridge east of the Swamp.¹

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WWALS is an IRS 501(c)(3) nonprofit charity
est. June 2012

WWALS Watershed Coalition WWALS advocates for conservation and stewardship of the surface waters and groundwater of the Suwannee River Basin and Estuary, in south Georgia and north Florida, among them the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds, through education, awareness, environmental monitoring, and citizen activities.

Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.



¹ Early County News, March 21, 2023, “Okefenokee Swamp mining debate reaches legislature,”
<https://www.earlycountynews.com/articles/okefenokee-swamp-mining-debate-reaches-legislature/>