

TPM's track record does not give confidence that this project can proceed without harming the surrounding ecosystem. While processing tailings at two of the four Chemours titanium mines on Trail Ridge in north Florida, TPM spilled wastewater during Hurricane Irma.⁷ Due to that incident and other infractions, TPM is still under a Florida consent order.⁸ Despite their history of failures, TPM promises not to spill wastewater next to the Okefenokee Swamp or the surrounding waterways. TPM also states that they will minimize impacts on the water levels of the swamp through a closed loop system. TPM proposes to use multiple experimental techniques, such as draglines, evaporators, and a layer of bentonite placed horizontally in an attempt to minimize impacts. The Okefenokee Swamp and its downstream rivers are too important to risk for untested mining methods.

Intact and undisturbed wetlands provide a wilderness experience that has a direct positive economic impact on surrounding gateway communities and across the state. Ecosystem destruction produces huge costs associated with cleanup and restoration. The historical destruction of another famous wetland, the Florida Everglades, has cost taxpayers an estimated \$8.8 billion through the Comprehensive Everglades Restoration Plan (CERP)⁹ for which the federal government has provided \$3.5 billion and Florida has provided \$5.3 billion. The state of Florida allocated another \$3.5 billion for Everglades restoration activities in January 2023.¹⁰ In total, CERP is expected to cost \$23.2 billion.¹¹ There is an enormous cost associated with trying to fix an ecosystem once it has been broken, and taxpayers, not industry groups, will be saddled with that cost.

Furthermore, on November 22, 2022, the U.S. Secretary of the Interior wrote a letter urging you to protect the Okefenokee Swamp and stating that "The Department will exercise its own authorities to protect the swamp ecosystem and will continue to urge our State and Federal partners to take steps under their own authorities to do the same."¹² The U.S. EPA¹³ and Fish and Wildlife Service¹⁴ have also filed letters of opposition. The evidence and the number of organizations and people in opposition indicate Georgia EPD should reject all the state applications from TPM.

Instead of permitting this mine, we urge you to join a Georgia bipartisan Congressional request for the U.S. Department of the Interior to nominate the Okefenokee National Wildlife Refuge as a UNESCO World Heritage Site.¹⁵ And we urge you to find ways to produce more sustainable jobs that support the preservation of the Okefenokee Swamp and the surrounding waterways. For more reasons to reject permits for this mine and to support the Okefenokee Swamp, see attachments below.



Respectfully,

Jen Lomberk, Esq.

Matanzas Riverkeeper

Board Chair of Waterkeepers Florida

CC:

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Attachment:

Resolution by Waterkeepers Florida, October, 2019

For Additional Information See:

[Public Comment from St. Marys Riverkeeper, March 15, 2023](#)

[Public Comment from Suwannee Riverkeeper, March 17, 2023](#)

[Letter to Gov. Kemp from Suwannee Riverkeeper, November 30, 2020](#)