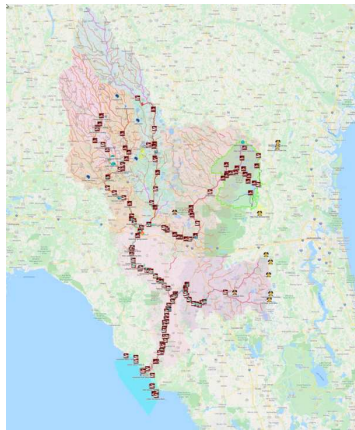
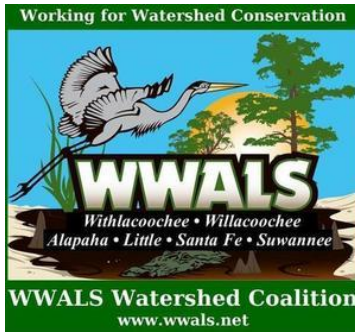


March 17, 2023



PO Box 88, Hahira, GA 31632
850-290-2350
wwalswatershed@gmail.com
www.wwals.net

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.



Land Protection Branch,
4244 International Parkway,
Atlanta Tradeport- Suite 104,
Atlanta, Georgia 30354
twinpines.comment@dnr.ga.gov

RE: WWALS Public Comments on Mining Land Use Plan of Twin Pines Minerals, LLC

Dear EPD,

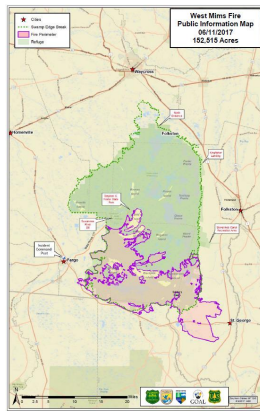
This letter recommends denying the permit applications by Twin Pines Minerals, LLC (TPM) to mine for titanium dioxide (TiO₂) near the Okefenokee Swamp, based on specifics of the Mining Land Use Plan,¹ as requested in the Notice of the Opportunity for Public Comment.²

Why this decision is important far away

First, we present some context for why this decision is important far away from the Okefenokee Swamp.

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.

During the 2017 West Mims fire, Lowndes County Fire (along with Valdosta and its other cities, and nearby counties) sent assistance from 75 miles away. They were among 900 firefighters from across the country.³ “There’s nobody that can tackle something like that alone,” said Lowndes County Emergency Management Director Ashley Tye, before Lowndes County Chairman Bill Slaughter read a thank-you letter from the Charlton County Commission, which said in part, “We would not have been able to defend the livelihood of our citizens without you or your equipment.”⁴



The 152,515 acres burned by the 2017 West Mims fire caused much local economic damage.⁵ The area burned included most of the land later purchased by Trail Ridge Land, LLC, which Twin Pines Minerals, LLC (TPM) now proposes to mine. That fire disaster thus set up the conditions

for the current potential mining incursion too near the Okefenokee Swamp.

The local economy around the Okefenokee Swamp is aided by and is significant to economies far away. For example, the first sign off of I-75 southbound at Exit 16 says “Okefenokee Swamp, Stephen C. Foster State Park, 62 Miles,” which encourages people to stay overnight in Valdosta and eat in restaurants there. People from Lowndes County and much farther away travel to that Park and to the Refuge and to the Suwannee River for paddling, fishing, birdwatching, and other activities. SCFSP is in Charlton County, and, as already mentioned, any lowered water level in the Okefenokee Swamp affects the whole Swamp.



Further, according to the U.S. Fish and Wildlife Service, the Okefenokee National Wildlife Refuge (NWR) provides more economic benefit to each of Georgia and Florida than any other NWR.⁶