

WHEREAS, TPM has no experience in titanium mining; and;

WHEREAS, TPM proposes to use drag lines, a method never used for such mines on Trail Ridge in Georgia or Florida by the only other company doing such mining, Chemours, and;

WHEREAS, TPM has not met its burden of proof to demonstrate that such a mine would not contaminate the Okefenokee Swamp or the Floridan Aquifer, or lower the water level in the Swamp or the Aquifer, and;

WHEREAS, lowering the water level in the Okefenokee Swamp would reduce the areas that can be reached by boat both in the Swamp and on the Suwannee River, and;

WHEREAS, reducing the water level in the Okefenokee Swamp or dewatering land areas would increase fire risk, and;

WHEREAS, wildfires in and around the Okefenokee Swamp adversely affect the forestry industry, tourism, and the citizens of Clinch County, and;

WHEREAS, TPM has not accounted in its hydrological studies for creeks and other waterways connecting its mine site to the St. Marys River and the Okefenokee Swamp, despite requests from the Georgia Environmental Protection Division (GA-EPD) for years, nor does TPM have plans to do water quality testing in the St. Marys or Suwannee Rivers or in the Okefenokee Swamp, and;

WHEREAS, strip mining is very likely to disturb and distribute mercury previously deposited through the air from coal power plants in Georgia, such mercury is toxic to wildlife and humans, and if its gets into the Swamp is is very likely to also get into the Suwannee River, and;

WHEREAS, TPM has not said how it will deal with nanoparticles of clay (slimes), which make constructing retaining dams difficult and if they escape can suffocate fish, nor has TPM even produced a study of the percentage-wise prevalence of slimes on that site, which is reputed to be higher than at existing mine sites, which would make the risk greater, and;

WHEREAS, TPM has not said how it will deal with the potential toxic effects of the bentonite clay it plans to use as fill, even though bentonite can suffocate fish and has other toxic effects, and;

WHEREAS, while the mine site is in the St. Marys River Basin, there is no barrier in the Okefenokee Swamp between the St Marys and Suwannee River Basins, so any contamination or water level changes of the Swamp would most likely affect the entire Okefenokee Swamp and the Suwannee River, and;