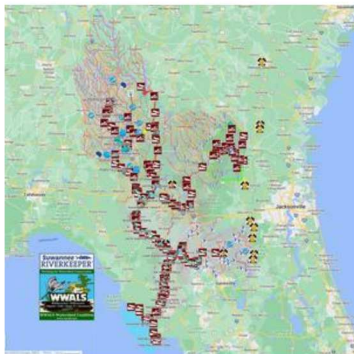
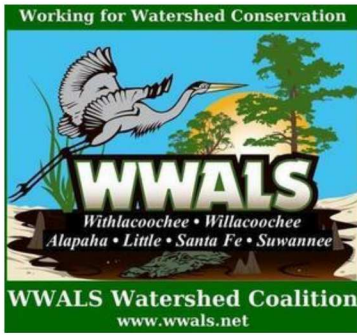


April 9, 2024



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

*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.*



To: Jeff Cown, Director  
Georgia Environmental Protection Division  
2 Martin Luther King, Jr. Drive SE  
Suite 1456 East Tower  
Atlanta, GA 30334  
[TwinPines.Comment@dnr.ga.gov](mailto:TwinPines.Comment@dnr.ga.gov)

Re: WWALS comment on Twin Pines Minerals Permit Applications

Dear Director Cown,

Within the 60-day public comment period, Suwannee Riverkeeper for WWALS Watershed Coalition, Inc. (WWALS) files these comments in opposition to the permit applications by Twin Pines Minerals (TPM) for a “demonstration” mine for titanium dioxide (TiO<sub>2</sub>) within three miles of the Okefenokee Swamp, the headwaters of the Suwannee and St. Marys Rivers, and above the Floridan Aquifer from which we all drink in south Georgia and north Florida, for agriculture, industry, and personal use. Such mining also risks the Okefenokee National Wildlife Refuge (ONWR), an economic engine for the four surrounding counties in Georgia and Florida and far beyond.

I would particularly like to call your attention to deficiencies in the permit applications regarding water modeling, monitoring, and management, including mercury, spills, and slimes, as well as the omission of actual or potential effects on Florida from the draft permits.

The permit applicant, even with assistance from employees of the Georgia Environmental Protection Division (GA-EPD) and others, has not proven their proposed mine would not harm the Okefenokee Swamp, the St. Marys River, the Suwannee River, the surficial aquifer, or the Floridan Aquifer, in Georgia or Florida.

I ask you again to reject these permits, or at the very least to make the changes suggested herein and by other comments.

For the convenience of the reader, actionable questions in this document are boldfaced and bullet pointed.

<b>Water Quality and Quantity Modeling and Monitoring</b>	<b>2</b>
<b>Water Management, Mercury, Spills, and Slimes</b>	<b>5</b>
Mercury	5
Spills	7
Slimes	9
<b>Florida</b>	<b>10</b>
<b>Conclusion</b>	<b>14</b>