March 5, 2023

Mr. Richard Dunn
Director
Environmental Protections Division (EPD),
2 Martin Luther King Jr. Drive SE
Suite 1456, East Tower
Atlanta, Georgia 30334

RE: Comments on Mining Land Use Plan (MLUP), Twin Pines Minerals, LLC

Dear Director Dunn,

On behalf of the Okefenokee Swamp Park, Inc. (OSP), I am pleased to offer these comments related to the Twin Pines Minerals application for an open pit mine on Trail Ridge near Okefenokee National Wildlife Refuge (Refuge).

OSP has welcomed millions of visitors from all over the world during our 75-year history. We are a 501(c)3 nonprofit corporation operating near the Okefenokee National Wildlife Refuge’s northern and eastern entrances (near Waycross and Folkston, respectively) providing outfitting, research, natural history, and environmental education to the public.

Regionally the Refuge, including Okefenokee Swamp Park and Stephen C. Foster State Park, helps support 753 jobs[1]. Additionally, the National Wildlife Refuge has a financial and economic impact of $ 64 million, which has steadily increased year over year[2].

The Refuge and OSP are currently engaged in an exciting opportunity to advance the nomination of the Refuge to become designated as a United Nations (UNESCO) World Heritage Site[3]—which will be a game changer for ecotourism in Southeast Georgia. The internationally recognized UNESCO designation would enhance the long-term ecotourism economic impact and worldwide recognition of this unique wetland.

Per the EPD Notice of Opportunity to Comment[4]:

“where a mining site is to be located on lands or adjacent to lands containing natural or other resources which may be adversely affected by the mining operation, the mining operator shall include as an attachment to the Mining Land Use Plan, a plan to alleviate and/or mitigate adverse effects of such impacts.”

It was noted that the EPD documents online[5] did not include an appendix that explicitly addresses a plan to protect the extraordinary natural resources of the Okefenokee or the St. Marys River. We respectfully request that you provide it to our Board of Trustees at your very earliest convenience.
In reviewing Twin Pines Minerals Draft Mining Land Use Plan and associated documents posted by EPD, we are also concerned about the widely differing technical conclusions and predictions on the swamp water levels offered by the Twin Pines consultants and other experts. The Mine Land Use Plan, based on hydrologic (groundwater and surface) analysis, has been called into question by scientists, including Dr. Jackson from the University of Georgia, experts at the US Department of the Interior, and others. Both OSP locations are on the east side of the Okefenokee and drains south from our locations. The proposed Twin Pines Mine is in this basin also.

Ultimately, should the proposed mine cause a significant lowering of the water levels, there would be a significant economic impact on our operations—as well as businesses and jobs in the region. **Until we can be assured this could never happen, and out of an abundance of caution, we would recommend against permitting the mining of Trail Ridge at any site that might threaten the water levels of the Okefenokee.**

We hope that the EPD will weigh all these opinions and reach the best conclusion for the long-term protection of the Okefenokee as well as the best interests of economic development in our region.

Thank you for the opportunity to offer these comments and concerns.

My best regards,

S. William Clark III, MD  
Chair, Okefenokee Swamp Park, Inc.

[2] Ibid.