

United States Senate

WASHINGTON, DC 20510-1011

April 9, 2024

Mr. Jeff Cown
Director, Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive SE
Atlanta, GA 30334

Dear Director Cown:

As a fellow steward of Georgia's environmental and economic future, I urge in the strongest terms that the Georgia Environmental Protection Division (EPD) deny final permits to Twin Pines Minerals, LLC (Twin Pines) for air quality, use of groundwater, or surface mining at the site of a proposed strip mine near the Okefenokee National Wildlife Refuge ("the Refuge").

I call to your attention urgent analyses and warnings from leading environmental scientists and officials, including the U.S. Fish & Wildlife Service (FWS), which has stewarded the Refuge since 1937 and opposes the proposed mine.ⁱ

Simply put: the Okefenokee is irreplaceable. It is too precious to risk. Should EPD approve this mine, there is a clear and credible risk of severe and irreversible long-term damage to the Refuge.

FWS has warned that permitting mining near the Okefenokee could lead to "irreversible damage" to the Refuge, which is one of the Nation's most ecologically important wetlands, a National Natural Landmark as designated by the Secretary of the Interior, and an internationally recognized Ramsar Wetland of International Importance.ⁱⁱ FWS has raised concerns about the veracity of the hydrological modeling submitted by Twin Pines, noting that the "modeling and hydrogeologic characterization presented by the consultant for [Twin Pines] is inadequate to assess" the effects of withdrawing 1.44 million gallons of water per day from the Floridan aquifer.ⁱⁱⁱ U.S. Secretary of the Interior Deb Haaland has likewise warned that the proposed mine "poses an unacceptable risk to the long-term hydrology and future of the swamp ecosystem."^{iv}

In early 2023, EPD held a 60-day comment period for the draft Mining Land Use Plan for Twin Pines, during which more than 78,700 comments were submitted. Among them were technical comments submitted by Dr. Rhett Jackson, the leading hydrologist at the University of Georgia, who warned the mining operation could lead to severe damage to the Refuge's wetland ecosystem.^v

Earlier this year, EPD released Twin Pines' response to the 2023 comments from Dr. Jackson, other technical experts, and other members of the public. In comments submitted to EPD last

month, Dr. Jackson stated that Twin Pines' response contained "no new information refuting the critical technical comments" that he and U.S. Department of the Interior hydrologists submitted last year. Dr. Jackson further noted that Twin Pines' model "simulates average conditions. It does not address issues associated with hydrologic extremes, either drought or large storm events. In other words, the model doesn't address any of the conditions during which problems are likely to arise."^{vi}

Dr. Jackson's analysis assesses that "the planned extraction and evaporation of surficial groundwater that seeps into the mining pit will directly rob water from the [Okefenokee] water budget," which will be "most noticeable during drought conditions, as it is this surficial groundwater seepage that helps sustain the swamp during droughts." During drought, the Okefenokee and the surrounding area are susceptible to devastating fires, which not only risk Georgians' lives but also cause significant economic harm to our state. A 2007 fire in the swamp cost \$130 million, closed schools and roads, and forced more than 6,000 Georgians to flee their homes.^{vii}

This is just a small selection of the many clear and compelling warnings from scientific experts, Federal officials charged with protecting the Okefenokee, and thousands of Georgia's citizens.

To permit this mining operation risks irreversible damage to an irreplaceable natural resource beloved by Georgians.

With great respect and appreciation for your stewardship of Georgia's air, land, and water resources, I therefore urge in the strongest terms that EPD deny these permits.

Sincerely,



Jon Ossoff
United States Senator

ⁱ U.S. Fish & Wildlife Service. "Frequently Asked Questions: Okefenokee National Wildlife Refuge and Twin Pines Mine." April 2024. Available at: <https://www.fws.gov/sites/default/files/documents/2024-04/faqs-twin-pines-and-okefenokee-final-508.pdf>.

ⁱⁱ Ibid.

ⁱⁱⁱ Ibid.

^{iv} Letter from Secretary Haaland to Governor Kemp, November 22, 2022. Available at: <https://sciencelookup.org/wp-content/uploads/2021/11/Letter-ESB46-009514-Okefenokee-Swamp-Ecosystem-and-Proposed-Mining-Activities-2022-11-22-Signed.pdf>

^v Dr. C. Rhett Jackson, John Porter Stevens Distinguished Professor of Water Resources, University of Georgia. "TMP LLC's Proposed Trail Ridge Mine: Hydrologic Effects on the Okefenokee Swamp." January 28, 2023.

^{vi} Dr. C. Rhett Jackson, John Porter Stevens Distinguished Professor of Water Resources, University of Georgia. "Continued problems with the assessment of the hydrologic effects of the proposed TPM LLC mineral sands mine and a recommendation for an independent expert panel." March 27, 2024.

^{vii} Mary Caldwell, Atlanta Journal-Constitution. "Okefenokee Swamp Fire: Why swamps burn." May 19, 2017. Available at: <https://www.ajc.com/news/disasters/okefenokee-swamp-fire-why-swamps-burn/Nu803TLFPjM8xvAQsr2hNL>.