

March 9, 2023

To: U.S. Waterkeepers

Re: Please support the Okefenokee Swamp over a strip mine for white paint

Waterkeeper colleagues,

Action is needed to protect the Okefenokee Swamp, the largest blackwater swamp in North America and headwaters of the St. Marys and Suwannee Rivers, located in southeast Georgia. Twin Pines Minerals, LLC (TPM) is applying for permits from the Georgia Environmental Protection Division (EPD) to mine nearly 580 acres for titanium dioxide: only 3 miles from the Okefenokee Swamp and 5 miles from the main stem St. Marys River.

These permits are just for their phase 1 demonstration mine that the miners say will show that their plan can be conducted safely while protecting the environment. But miners don't stop with just one bite, as evidenced by other titanium TiO₂ mines in Florida and Georgia, on the same Trail Ridge as this site.

TPM's original application submitted to the US Army Corps of Engineers back in 2019 spoke of 12,000 acres to be mined over 8 years.¹ Some of that turned out to be owned by Teachers Insurance and Annuity Association of America (TIAA), who insisted TPM remove it from their application.² TPM as Trail Ridge Land LLC still owns land extending north of the proposed mine site adding up to almost 8,000 acres, coming to within 400 feet of the Okefenokee Swamp, as the U.S. Fish and Wildlife Service warned, also in 2019.³ The miners withdrew their original application and reapplied for only the 582 acres, small enough that they could claim the site had no jurisdictional wetlands. By so doing, they violated a Federal policy against "segmenting" permit applications. So, the planned mining area has been in constant flux in response to permitting, legal, and marketing considerations.

People from around the world visit the Okefenokee National Wildlife Refuge (ONWR) for its paddle trails, dark skies, and wilderness beauty. According to the U.S. Fish and Wildlife Service, the ONWR provides more economic benefit to each of Georgia and Florida than any other NWR.⁴ The southeastern corner of the swamp feeds the St. Marys River which results in the river having zero flow during droughts and flooding during heavy rains. The St. Marys River is pristine due to the waterfront being entirely privately owned by timber plantations, conservation districts, and private citizens. With white sandy shores, blue skies, green trees, and the darkest blackwater, you cannot but be in awe of this spectacular place.

¹ The original 2019 TPM permit notice from the U.S. Army Corps of Engineers:

<https://wwals.net/pictures/2019-07-12--tpm-usace/SAS-2018-00554-Charlton-0712-SP-HAR.pdf>

And the complete original 2019 TPM permit application:

<http://www.wwals.net/pictures/2019-07-12--tpm-usace/Twin-Pines-Individual-Permit-Application--complete.pdf>

² Mary Landers, SavannahNow.com, September 26, 2020, Regulators seek no remedy for false claims on Okefenokee mining permit request,

<https://www.savannahnow.com/story/news/2020/09/26/regulators-seek-no-remedy-for-false-claims-on-okefenokee-mining-permit-request/114874778/>

³ U.S. Fish and Wildlife Service to Georgia U.S. Senator David Perdue, November 21, 2021, "The initial project location is the farthest that mining activity would be from the Okefenokee National Wildlife Refuge (NWR) boundary and the Okefenokee Swamp. Any additional mining that occurs within the 12,000-acre permit area would be closer to the refuge. The northwest boundary of the permit area is within a half mile from the refuge boundary and 400 feet from the edge of the Okefenokee Swamp." <https://wwals.net/?p=52533>

⁴ U.S. Fish & Wildlife Service, June 2019, Banking on Nature 2017: The Economic Contributions of National Wildlife Refuge Recreational Visitation to Local Communities

https://www.fws.gov/sites/default/files/documents/USFWS_Banking_on_Nature_2017_0.pdf