



TPM’s original 2019 permit application spoke of 12,000 acres to be mined over 8 years.³³ Some of that, including the west half of “Alternative 1 - Preferred” on the above map, turned out to be owned by Teachers Insurance and Annuity Association of America (TIAA), who insisted TPM remove it from their application.³⁴ According to the Charlton County Tax Assessors maps, TPM as Trail Ridge Land LLC still owns land extending north of the proposed mine site adding up to almost 8,000 acres, including that northwest corner of “Alternative 2 - Loncale” within 400 feet of the Swamp. 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.

If the miners get their foot in the door with this application, they are unlikely to stop with the demonstration site, as illustrated by experience right across the state line. Not content with its four existing Florida TiO₂ mines, Chemours has gotten a fifth mine permitted, in the watersheds of Suwannee Riverkeeper. Chemours also has two active TiO₂ mines in Georgia, near Folkston and Jesup. All these existing mines indicate that there is no need for yet another mine, much closer to the Okefenokee Swamp. They also indicate that the miners are not likely to stop with just a demonstration mine.

The Okefenokee Swamp and its waterways are more important than white paint

According to Chemours³⁵ and the Florida Department of Environmental Protection (FDEP),³⁶ the Chemours Florida mines produce ilmenite, which is used to produce titanium dioxide (TiO₂). Titanium dioxide is used in the manufacture of clothing, paper, paint, sun block, and other products.³⁷ If TPM had contracts for anything else, no doubt they would have announced that by now. This TiO₂ does not become titanium metal, and is not necessary for national defense, as evidenced by the U.S. Department of Interior opposing the TPM mine. White paint and sun block are not worth risking the Okefenokee Swamp, the rivers, or the aquifer.

Intact and undisturbed wetlands provide a wilderness experience that has a direct positive economic