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Ms. Holly Ross  
U.S. Army Corps of Engineers  
1104 North Westover Boulevard  
Suite 9  
Albany, Georgia, 31707  
*holly.a.ross@usace.army.mil*

**RE:** Comment Letter, St. Marys Riverkeeper  
Twin Pines Minerals, LLC application number SAS-2018-00554

Dear Ms. Ross,

This letter of comment by the St. Marys Riverkeeper to the US Army Corps of Engineers is regarding the Twin Pines Minerals, LLC mine Section 404 permit application SAS-2018-00554, located on the Trail Ridge in Charlton County, Georgia.

The St. Marys Riverkeeper is a nonprofit organization founded in 2016 to protect, restore, and educate citizens about the St. Marys River and its watershed. We represent approximately 400 members whose livelihoods and well-being are dependent on the health of the St. Marys River, its headwaters and tributaries. Because the proposed mining site drains into both our headwaters in the Okefenokee Swamp and into our tributaries, we as an organization are extremely concerned about this application as presented.

The application discusses permanent impacts to 65 acres of wetlands and 4,658 linear feet of tributaries, and temporary impacts to 522 acres of wetlands and 2,454 feet of tributaries. These direct adverse impacts are orders of magnitude higher than other mining projects in the area. The nature of these impacts and reclamation plans after mining is complete are not fully addressed in the application- what methodology does the applicant plan to use to reconstruct impacted streams and wetlands? Additionally, these impacts are only for phase one of the project. The project has 6 phases, and the application does not address the cumulative impacts of mining 12,000 acres.

We also are concerned about effects on the water quality of the St. Marys River. The fish assemblages in our river are sensitive to changes in pH and turbidity, and could be negatively impacted by surface water runoff and increased pollutant load from the mining operation. Our river is home to two species of federally endangered fish, the shortnose sturgeon (*Acipenser brevirostrum*) and the Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*). The St. Marys River is designated critical habitat for both, meaning the river has “physical or biological features essential to the conservation of the species”. In the designation, the National Marine Fisheries Service cited sand and gravel mining as requiring “special management consideration or protection”. Juvenile Atlantic sturgeon sampled in the St. Marys indicate that our river is a spawning ground, but researchers from the University of Georgia and USFWS have not identified where Atlantic sturgeon spawn within the St. Marys watershed. Because we do not know where this endangered and small population within our watershed spawns, we must assume that the mining operation could negatively impact the local population of

Atlantic Sturgeon. Under the Endangered Species Act, the Army Corps of Engineers must ensure that this project is not likely to destroy or adversely modify habitat needed by these species.

The application also does not fully address the potential hydrological impacts of the mine. The applicant proposes to excavate 25-40 acres of land each year to an average depth of 50 feet. These pits will then be backfilled with homogenized soil from the mining tailings. It is unclear how this soil homogenization will affect the local hydrology. Because changes in groundwater flow from mining operations lower the water table, and because the site has very shallow groundwater, we also are concerned about the impact on adjacent isolated wetlands. The application, again, does not address these potential impacts.

The application indicated that a series of reports are forthcoming which will give information on two of the most prominent concerns we have about the project- the hydrogeology of the area and the methodology and feasibility for stream and wetland construction after mining. We requested an extension to the review process so that we may review these reports and provide more informed comment. Without this critical information needed from the applicant, we must now request the preparation of a full Environmental Impact Statement by your office. We also request that the Corps of Engineers conduct a public meeting to receive public comment on this project. This meeting should be held near to the mining site in Folkston, Georgia.

Sincerely,

A handwritten signature in black ink, appearing to read "Anna Laws".

Anna Laws  
St. Marys Riverkeeper