

June 17, 2020

Transmitted Via: Email (Holly.A.Ross@usace.army.mil)



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Ms. Holly Ross, Sr. Project Manager
U.S. Army Corps of Engineers
Savannah District - Regulatory Division
1104 N. Westover Blvd. Unit 9
Albany, Georgia 31707

Subject: Navigable Waters Protection Rule – Jurisdictional Review
Twin Pines Minerals, LLC
Saint George, Charlton County, Georgia
USACE Project No.: SAS-2018-00554
TTL Project No.: 000180200804.00

Dear Ms. Ross,

On June 22, 2020 the Navigable Waters Protection Rule (NWPR) becomes effective and subsequently defines the scope of waters subject to federal regulation under the Clean Water Act. In attempt to understand the effect of the NWPR on the proposed Saunders Demonstration Mine, TTL, Inc (TTL), on behalf of Twin Pines Minerals, LLC (TPM), respectfully requests review and re-consideration of the previously delineated and verified aquatic features for the Adirondack, TIAA, and Keystone Tracts. We recognize that this letter may not qualify as a formal request and are therefore requesting guidance as to the appropriate jurisdictional determination that should be submitted for formal re-consideration.

To aid in your review, we have evaluated the direct surface connectivity of the delineated features to include mapping culverts adjacent to and within the three tracts. These culverts are often connected to road-side ditches and provide downstream connection to navigable waters for some of the wetland and stream features. The attached map provides the locations of known culverts as well as the aquatic features TTL believes to be non-jurisdictional strictly based on the NWPR.

Please let TTL representatives know if you need additional information.

Sincerely,

TTL, Inc.

Handwritten signature of Christopher Terrell in blue ink.

Christopher Terrell
Project Professional

Handwritten signature of Christopher Stanford in blue ink.

Christopher Stanford
Project Professional

Handwritten signature of Cindy House-Pearson in blue ink.

Cindy House-Pearson
Senior Natural Resources
Client Manager