

Among other things, Twin Pines:

- Has not submitted a water management plan for mining operations.
- Has not “characterize[d] the pre-mining conditions along Trail Ridge.”²⁸
- Has provided practically no information regarding the middle 9,000 acres of the “project study area.”²⁹
- Has not “predict[ed] the impact of mining operations.”³⁰
- Has not “evaluate[d] the significance [or the extent] of the [‘humate-cemented’] Black Sand relative to the hydrology of the site.”³¹
- Has not developed groundwater flow models to evaluate hydrology and hydrogeology for the site, or the region.³²
- Has not “evaluate[d] the post-mining hydrogeological conditions to inform reclamation/restoration efforts.”³³
- Has not conducted on-site surveys for the following species of concern: Florida hartwrightia, floodplain tickseed, purple honeycomb-head, palafoxia, Chapman’s fringed orchid, yellow fringless orchid, or Stokes’ aster.³⁴
- Has not proposed mitigation measures to avoid an adverse effect on the threatened eastern indigo snake.³⁵
- In addition, the Corps has failed to provide 24 pages of a cultural resources report, which apparently includes the report’s conclusion.³⁶

In short, Twin Pines has left the Corps hamstrung. Or, if the Corps allows Twin Pines to supply all of these items after the public comment period is over, Twin Pines and the Corps will be complicit in denying the public an opportunity to provide meaningful comments. This is especially troubling considering the magnitude of adverse impacts that the proposed mine threatens to cause.

²⁸ Permit Application, App. F.

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ Permit Application at 22, 27–28.

³⁵ *Id.* at 33.

³⁶ *See* Permit Application, App. E: Cultural Resource Survey Reports, TerraXplorations, Inc., “A Phase I Cultural Resources Survey of the Twin Pines Minerals Keystone Property in Charlton County, Georgia,” at 41-65 (Oct. 26, 2018).