use to support its position. Even if these reports are helpful to Twin Pines, it has not made these critical studies available to the public. Twin Pines has claimed that it has been transparent throughout the permitting process and supplied information when asked to do so. Considering that these reports may be the most important elements of Twin Pines' application, if Twin Pines does not release them and their underlying data to the public, Twin Pines' claims of transparency will ring hollow.

In his expert report, which is attached as Exhibit D, Hutson sets forth his major findings to date. His summary of those finding follows:

- The potential for water pumped from the Floridan aquifer to lower water levels in wells owned by nearby water users that are completed in this aquifer has not been evaluated.

- There is no indication that the accumulation of natural or process-related contaminants in the process water has been considered. The plans do not specify whether the process water ponds will be lined to prevent leakage.

- The mine plan submitted to GAEPD indicates that the objectives for reclamation will be to re-establish vegetation and post-mining topography, which will mimic pre-mining topography. The reclamation discussion supplied with the USACE permit application indicates that the topography of the reclaimed mine spoils will be returned as close to pre-mining elevations as possible, with final elevations determined from recovered groundwater levels. It is unclear how simultaneous mining and placement of tailings to elevations based on recovered groundwater levels could occur within a single mine cut.

- Destruction of the low permeability layers and their replacement with homogenized tailings will likely allow increase drainage of groundwater from mined areas and result in a general lowering of groundwater elevations following mining. There is no indication that the elevation of groundwater following recovery and the time necessary for that recovery to occur has been evaluated.

- It is possible that water levels beneath Trail Ridge will never recover to current elevations after mining and that assumed temporary impacts to reconstructed wetlands will in actuality turn out to be permanent.

- The mining permit applications indicate that Twin Pines will be preparing reports on the physical site and subsurface materials, pumping tests conducted in the project area, the hydrogeology of the site, and reports on two groundwater flow models of the Twin Pines Project Area. Regulators and the public are being asked to review and approve of this development without the benefit of this basic information.

- Mining the sand will destroy the low permeability units that are known to be present in the subsurface. Destruction of these low permeability layers and