

The surveys do not encompass a sufficient geographic area. One survey was missing 24 pages, which included the conclusion of that survey. And the surveys themselves were improperly performed and not properly vetted.

After reviewing the three surveys, Terracon Consultants, Inc. identified seventeen substantial deficiencies. In the following, Terracon highlights the five potentially fatal deficiencies of the surveys:

First, no [area of potential effects] was defined for the project. Second, the architectural survey and descriptions in the [Twin Pines] report were inadequate and it is unclear if this work was performed by someone meeting [required] standards. Third, there are conflicting assessments of the [certain effects]. Fourth, two of the three project areas had no architectural surveys conducted . . . and at least one possible historic resource, the Atlantic, Valdosta, and Western Railway, was missed. Fifth, and perhaps most significantly, is that there is no discussion of potential archeological deposits that may have been found deeper than 80 cm below the ground surface. Testing of deposits deeper than 80 cm should have been conducted.<sup>330</sup>

Terracon's full report is attached as Exhibit P. Before proceeding, Twin Pines and the Corps should address all seventeen of the comments provided by Terracon. Below we focus on three of the most egregious deficiencies.

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<sup>330</sup> Letter report from William Green and Brent Handley to William W. Sapp, regarding Review of Three Cultural Resource Reports Pertaining to the Proposed Heavy Minerals/Twin Pines Mine Saint George, Charlton County, Georgia (August 28, 2019). A copy of this report is attached as Exhibit P.