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Tuscaloosa, AL 35401  
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Transmitted via email: ([holly.a.ross@usace.army.mil](mailto:holly.a.ross@usace.army.mil))

October 18, 2019

United States Corps of Engineers – Savannah District  
Mr. William Rutlin, Chief, Coastal Branch  
c/o: Ms. Holly Ross  
1104 North Westover Boulevard, Suite 9  
Albany, Georgia 31707

**RE:            *SAS-2018-00554***  
***Requested Information***  
***Twin Pines Minerals***  
***St. George, Charlton County, Georgia***  
***TTL Project No. 000180200804.00***

Dear Mr. Rutlin:

In response to your letter dated October 9, 2019, TTL, Inc (TTL), on behalf of Twin Pines Minerals, LLC (Twin Pines), respectfully provides the following information regarding the recent construction of an equipment staging area and construction yard.

The area described in the letter is solely located within the Keystone Property and consists of 7.405± acres as shown on the attached figure titled “Dragline Yard Location Map”. The figure also shows the location of verified aquatic features within the Keystone Property, as well as TTL delineated aquatic features within the adjacent TIAA property. The location of photos taken by TTL on October 10, 2019 are also indicated on the figure. These photographs are included in the attachments to this letter. Photos were taken utilizing an iPhone application titled “Timestamp Camera Pro.” This application allows the user to include the current time and date of the photograph and the location, including latitude and longitude. Please note that the latitude and longitude displayed on Photo 2 is incorrect, this photo was manually adjusted based on the known location of the photograph as being at the southeast corner of the construction yard.

On December 18, 2018 Twin Pines received a letter from the United States Army Corps of Engineers (USACE) Savannah District indicating that TTL provided maps dated December 6, 2018 correctly identifies “the delineation limits of all aquatic resources within the review area.” A copy of this letter is included for reference.

In response to the USACE letter addressed herein, on October 11, 2019, TTL obtained an updated Official Species List via the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) (consultation code 04EG1000-2020-SLI-0129, event code 04EG1000-2020-E-00241). The species list includes the Red-cockaded Woodpecker (endangered), the Eastern Indigo Snake (threatened), the gopher tortoise (candidate), and the Frosted Flatwoods Salamander (threatened). A copy of the Official Species List is included as an attachment.

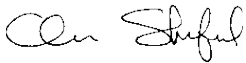
From November 2018 to April 2019 TTL and Altamaha Environmental Consulting conducted amphibian and reptile surveys across four tracts of property, including the Keystone property, of which the construction yard is located. During these surveys, no threatened, endangered, or candidate amphibian or reptile species were identified in the area of the construction yard. The surveys conducted were species specific targeting the eastern indigo snake, gopher tortoise, frosted flatwoods salamander, striped newt, and gopher frog. The complete survey report was submitted as part of the Individual Permit application and is titled "2018-2019 Survey Report for Protected Amphibians/Reptiles on the Twin Pines Site, Charlton County, Georgia."

On October 10-11, 2019, TerraXplorations (TerraX) completed 31 supplemental deep auger tests within the footprint of the construction yard to determine the presence/absence of potential deeply buried cultural resources. No cultural resources were identified during this testing. A copy of TerraX's letter report is included as an attachment to this letter. During the Phase I cultural resource survey of the Keystone Property no significant cultural resources were identified within the construction pad footprint. Furthermore, no significant cultural resources were identified within in the Keystone Property. A copy of "A Phase I Cultural Resources Survey of the Twin Pines Minerals Keystone Property in Charlton County, Georgia" was submitted as part of the Individual Permit application.

TTL appreciates the opportunity to continue to work with you on this project. If you have any questions or if we may be of further assistance, please contact the undersigned at 205.345.0816.

Sincerely,

TTL, Inc.



Chris Stanford  
Project Professional



Cindy House-Pearson  
Vice-President

Attachments:      Dragline Yard Location Map  
                         Site Photographs  
                         USACE Aquatic Feature Verification Letter – December  
                         USFWS IPaC Official Species List  
                         TerraXplorations - Supplemental auger testing letter report

Cc:            Mr. Steve Ingle – Twin Pines Minerals  
                 Mr. Mark Fowler – Twin Pines Minerals  
                 Ms. Terri Lyndall – Galloway & Lyndall, LLP  
                 Mr. Chris Terrell – TTL  
                 Mr. William M. Rutlin – Chief, USACE Savannah District, Coastal Branch



**SITE LEGEND**

- Property Parcel Boundary
- Dragline Pad
- Wetland Area
- Photograph Location

0 500  
Feet



DRAGLINE YARD LOCATION MAP  
 THE TWIN PINES MINING AREA  
 TWIN PINES MINERALS  
 ST. GEORGE, CHARLTON COUNTY, GEORGIA

BASEMAP: DigitalGlobe, 3/24/2018 (0.46 m Resolution).

DRAWN BY: DEK
CHECKED BY: CMS/CT
DRAWING DATE: 10/10/2019
REVISION DATE: N/A
TTL JOB NO.: 000180200804.00
APPROX. SCALE: 1 in = 500 ft

**Site Photographs**

SAS-2018-00554 — TTL Project No. 000180200804.00  
Twin Pines Minerals • St. George, Charlton County, Georgia  
Photos taken October 10, 2019



Photograph 1: View to the north of the entrance into the construction yard.



Photograph 2: View to the west of the southern limits of the construction laydown yard.



**Site Photographs**

SAS-2018-00554 — TTL Project No. 000180200804.00  
Twin Pines Minerals • St. George, Charlton County, Georgia  
Photos taken October 10, 2019



Photograph 3: View to the west of the vegetative buffer (left side of photograph) and northernmost silt fence.



Photograph 4: View to the north of T-Model Road, silt fence, and cleared vegetation.



**Site Photographs**

SAS-2018-00554 — TTL Project No. 000180200804.00  
Twin Pines Minerals • St. George, Charlton County, Georgia  
Photos taken October 10, 2019



Photograph 5: View to the west of the vegetative buffer (right side of photograph) and northernmost silt fence.



Photograph 6: View to the south of the construction yard with BMPs.

**TTL**



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Georgia Ecological Services Field Office  
355 East Hancock Avenue  
Room 320  
Athens, GA 30601  
Phone: (706) 613-9493 Fax: (706) 613-6059

In Reply Refer To:

October 11, 2019

Consultation Code: 04EG1000-2020-SLI-0129

Event Code: 04EG1000-2020-E-00241

Project Name: Construction Pad

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

This list identifies threatened, endangered, proposed and candidate species, as well as critical habitat, that may be affected by your proposed project. This list may change before your project is completed. Under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this list should be verified after 90 days. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation.

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*). Projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)).

Wind energy projects should follow the wind energy guidelines <http://www.fws.gov/windenergy/> for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts of communication towers on migratory birds can be found under the "Bird Hazards" tab at: [www.fws.gov/migratorybirds](http://www.fws.gov/migratorybirds).

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Georgia Ecological Services Field Office**

355 East Hancock Avenue

Room 320

Athens, GA 30601

(706) 613-9493

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## Project Summary

Consultation Code: 04EG1000-2020-SLI-0129

Event Code: 04EG1000-2020-E-00241

Project Name: Construction Pad

Project Type: LAND - CLEARING

Project Description: Clearing for construction equipment staging pad

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/30.52019052044531N82.12605076358267W>



Counties: Charlton, GA

## Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Birds

NAME	STATUS
Red-cockaded Woodpecker <i>Picoides borealis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/7614">https://ecos.fws.gov/ecp/species/7614</a>	Endangered

### Reptiles

NAME	STATUS
Eastern Indigo Snake <i>Drymarchon corais couperi</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/646">https://ecos.fws.gov/ecp/species/646</a>	Threatened
Gopher Tortoise <i>Gopherus polyphemus</i> Population: eastern No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6994">https://ecos.fws.gov/ecp/species/6994</a>	Candidate

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## Amphibians

NAME	STATUS
Frosted Flatwoods Salamander <i>Ambystoma cingulatum</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/4981">https://ecos.fws.gov/ecp/species/4981</a>	Threatened

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

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**DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS  
SAVANNAH DISTRICT  
100 W. OGLETHORPE AVENUE  
SAVANNAH, GEORGIA 31401-3604**

**December 18, 2018**

Regulatory Branch  
SAS-2018-00554

Mr. Steve Ingle  
Twin Pines Minerals, LLC  
2100 Southbridge Parkway, Ste. 540  
Birmingham, Alabama 35209

Dear Mr. Ingle:

I refer to a letter dated October 3, 2018, submitted on your behalf by Ms. Cindy House-Pearson of Resource and TTL Inc., requesting a delineation of aquatic resources for your 1,034 acre and 1,012 acre sites located in Charlton County, Georgia (Latitude 30.5266, Longitude -81.1157). This project has been assigned number SAS-2018-00554 and it is important that you refer to this number in all communication concerning this matter.

The enclosed exhibits entitled "Figure 6: Waters of the U.S. Delineation Map, Twin Pines Minerals - Loncala Tract, Charlton County, Georgia" and "Figure 6: Waters of the US Delineation Map - Keystone Properties, Waters of the U.S. Delineation", dated December 6, 2018; identifies the delineation limits of all aquatic resources within the review area. The wetlands were delineated in accordance with criteria contained in the 1987 "Corps of Engineers Wetland Delineation Manual," as amended by the most recent regional supplements to the manual. This delineation will remain valid for a period of 5-years unless new information warrants revision prior to that date.

If you intend to sell property that is part of a project that requires Department of the Army Authorization, it may be subject to the Interstate Land Sales Full Disclosure Act. The Property Report required by Housing and Urban Development Regulation must state whether, or not a permit for the development has been applied for, issued or denied by the U.S. Army Corps of Engineers (Part 320.3(h) of Title 33 of the Code of Federal Regulations).

This communication does not convey any property rights, either in real estate or material, or any exclusive privileges. It does not authorize any injury to property, invasion of rights, or any infringement of federal, state or local laws, or regulations. It does not obviate your requirement to obtain state or local assent required by law for the development of this property. If the information you have submitted, and on which the U.S. Army Corps of Engineers has based its determination is later found to be in error, this decision may be revoked.

A copy of this letter is being provided to the following party:  
Ms. Cindy House-Pearson of TTL Inc., 3516 Greensboro Avenue, Tuscaloosa, Alabama  
35401.

Thank you in advance for completing our on-line Customer Survey Form located at  
[http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey). We value your  
comments and appreciate your taking the time to complete a survey each time you have  
interaction with our office.

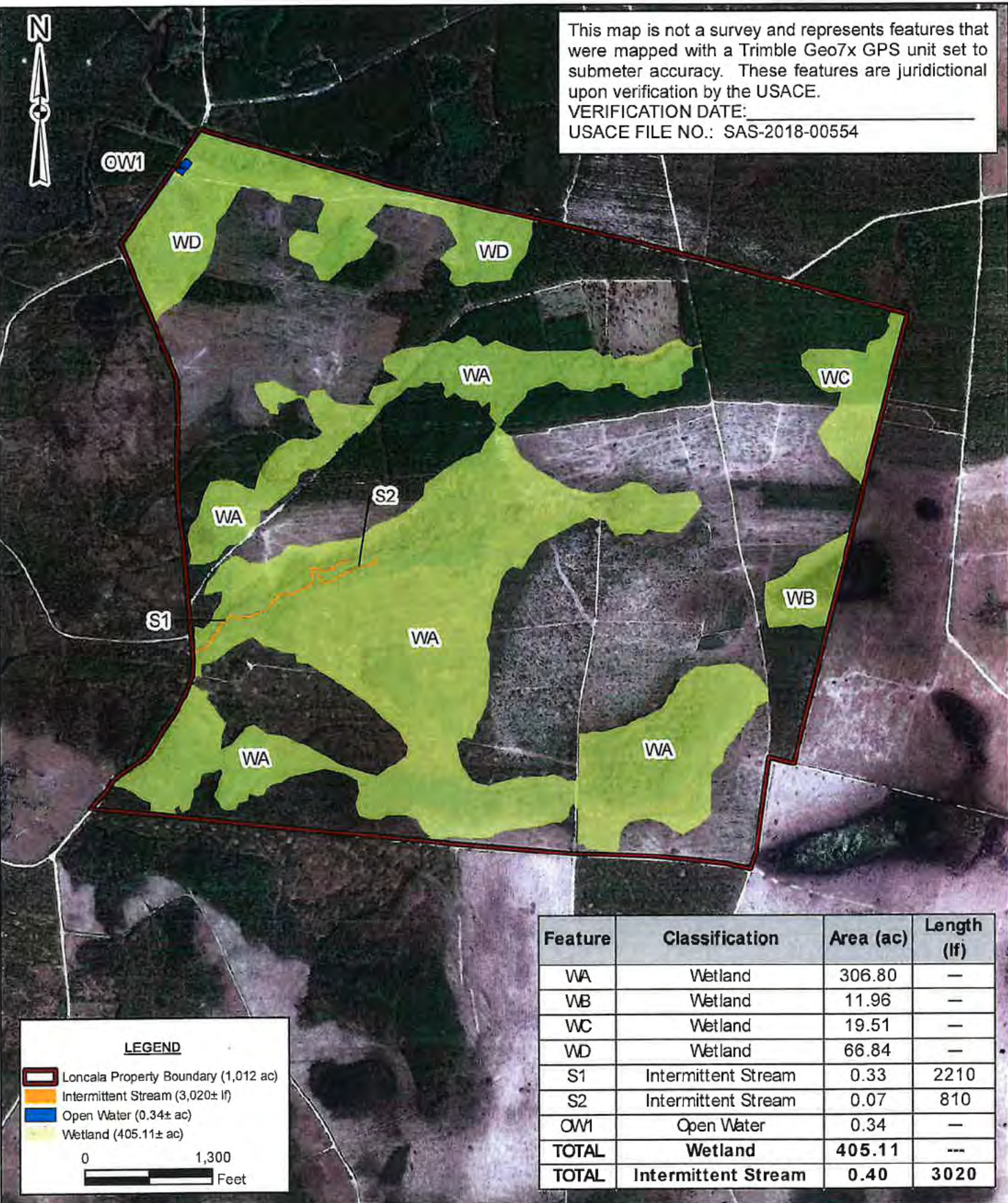
If you have any questions, please call me at (912) 652-5022.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Guinn", followed by a horizontal line extending to the right.

Scott Guinn  
Regulatory Specialist, Coastal Section

Enclosures



This map is not a survey and represents features that were mapped with a Trimble Geo7x GPS unit set to submeter accuracy. These features are jurisdictional upon verification by the USACE.  
 VERIFICATION DATE: \_\_\_\_\_  
 USACE FILE NO.: SAS-2018-00554

**LEGEND**

- Loncala Property Boundary (1,012 ac)
- Intermittent Stream (3,020± lf)
- Open Water (0.34± ac)
- Wetland (405.11± ac)

0                      1,300  
 Feet

Feature	Classification	Area (ac)	Length (lf)
WA	Wetland	306.80	—
WB	Wetland	11.96	—
WC	Wetland	19.51	—
WD	Wetland	66.84	—
S1	Intermittent Stream	0.33	2210
S2	Intermittent Stream	0.07	810
OW1	Open Water	0.34	—
<b>TOTAL</b>	<b>Wetland</b>	<b>405.11</b>	<b>---</b>
<b>TOTAL</b>	<b>Intermittent Stream</b>	<b>0.40</b>	<b>3020</b>

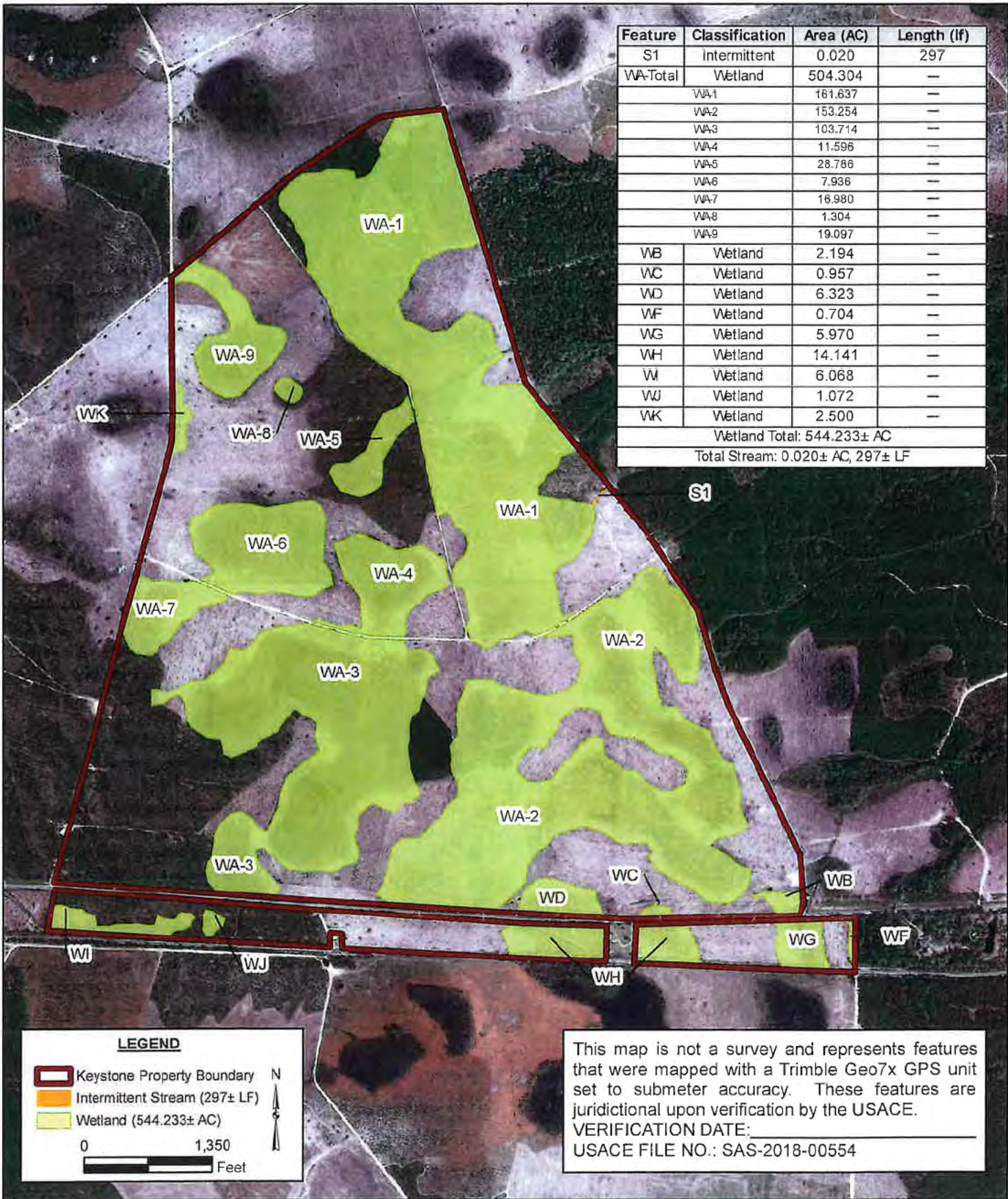


**FIGURE 6: WATERS OF THE US  
 DELINEATION MAP**  
 TWIN PINES MINERALS - LONCALA TRACT  
 CHARLTON COUNTY, GEORGIA

BASEMAP: Google Earth & Europa Technologies (3/6/2018)

DRAWN BY: CMS
CHECKED BY: CGT
DRAWING DATE: 07/30/2018
REVISION DATE: 12/06/2018
TTL JOB NO. 000180206804.00
APPROX SCALE 1" = 1,300'

Feature	Classification	Area (AC)	Length (lf)
S1	Intermittent	0.020	297
WA-Total	Wetland	504.304	—
WA1		161.637	—
WA2		153.254	—
WA3		103.714	—
WA4		11.596	—
WA5		28.786	—
WA6		7.936	—
WA7		16.980	—
WA8		1.304	—
WA9		19.097	—
WB	Wetland	2.194	—
WC	Wetland	0.957	—
WD	Wetland	6.323	—
WF	Wetland	0.704	—
WG	Wetland	5.970	—
WH	Wetland	14.141	—
WI	Wetland	6.068	—
WJ	Wetland	1.072	—
WK	Wetland	2.500	—
Wetland Total:		544.233± AC	
Total Stream:		0.020± AC, 297± LF	



**FIGURE 6: WATERS OF THE US DELINEATION MAP**  
**TWIN PINES MINERALS - KEYSTONE PROPERTIES**  
**WATERS OF THE U.S. DELINEATION**

BASEMAP: Google Earth, Europa Technologies (C) 2018. Image Date: 3/6/2018

DRAWN BY: CMS
CHECKED BY: CGT
DRAWING DATE: 09/18/2018
REVISION DATE: 12/06/2018
TTL JOB NO. 000180200504.00
APPROX. SCALE: 1" = 2,000'



October 14, 2019

Mr. Chris Stanford  
Project Professional  
TTL, Inc.  
3516 Greensboro Avenue  
Tuscaloosa, Alabama 35401

Re: Supplemental auger testing at the Twin Pines Keystone dragline workspace within the Twin Pines Minerals Keystone Property in Charlton County, Georgia.

Mr. Stanford,

Per your request for additional auger testing to locate cultural materials within the boundaries of the dragline workspace within the Twin Pines Minerals Keystone property in Charlton County, Georgia, TerraXplorations, Inc. (TerraX) provides the following information.

Between October 10 and October 11, 2019, TerraX, of Tuscaloosa, Alabama, performed a series of bucket auger tests within a 6.80 acre (27,501.20 square meter) dragline workspace of the Twin Pines Keystone property in Charlton County, Georgia (Figure 1). Fieldwork was conducted by Field Directors Matt Lyons and Wesley White. The purpose of this study was to ascertain if cultural horizons were present at depths greater than previously explored during Phase I shovel testing at the same location in August of 2018. The previous Phase I survey did not reveal any cultural resources within the boundaries of the dragline workspace. The lead federal agency for this project is the US Army Corps of Engineers, Savannah District.

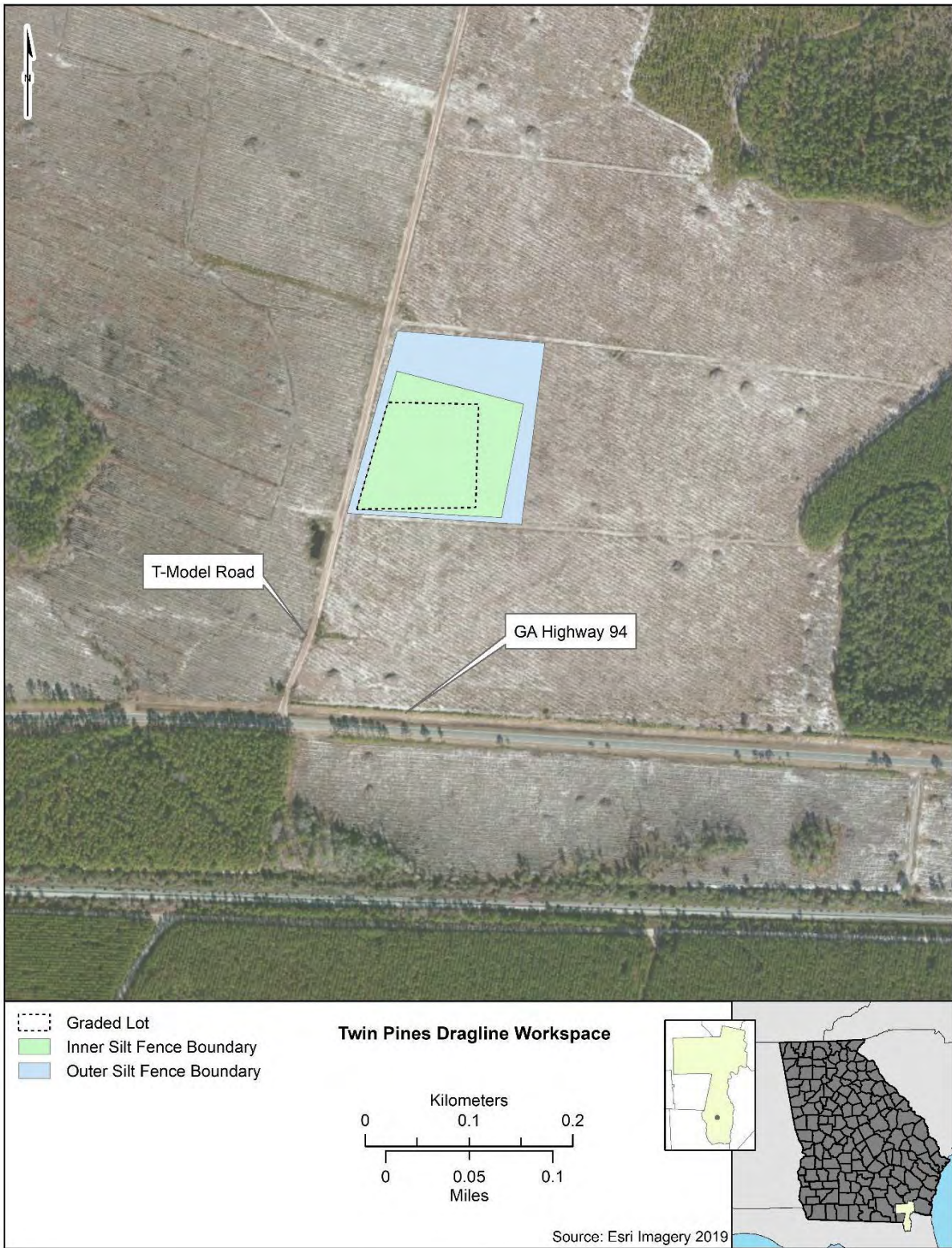
Field methods included the placement of auger tests in a 30-meter interval grid within the silt- fenced boundary of the workspace (Figure 2). Testing was performed with a 4-inch diameter bucket auger and soils were screened through ¼-inch hardware mesh for the purpose of recovering any cultural material that may exist at that location. Tests were terminated when water was encountered and the bucket auger could no longer retain soils. A total of 31 auger tests were excavated; none of these tests yielded cultural materials.

*3130 East University Blvd  
Tuscaloosa, Alabama  
35404  
www.terraexplorations.com*

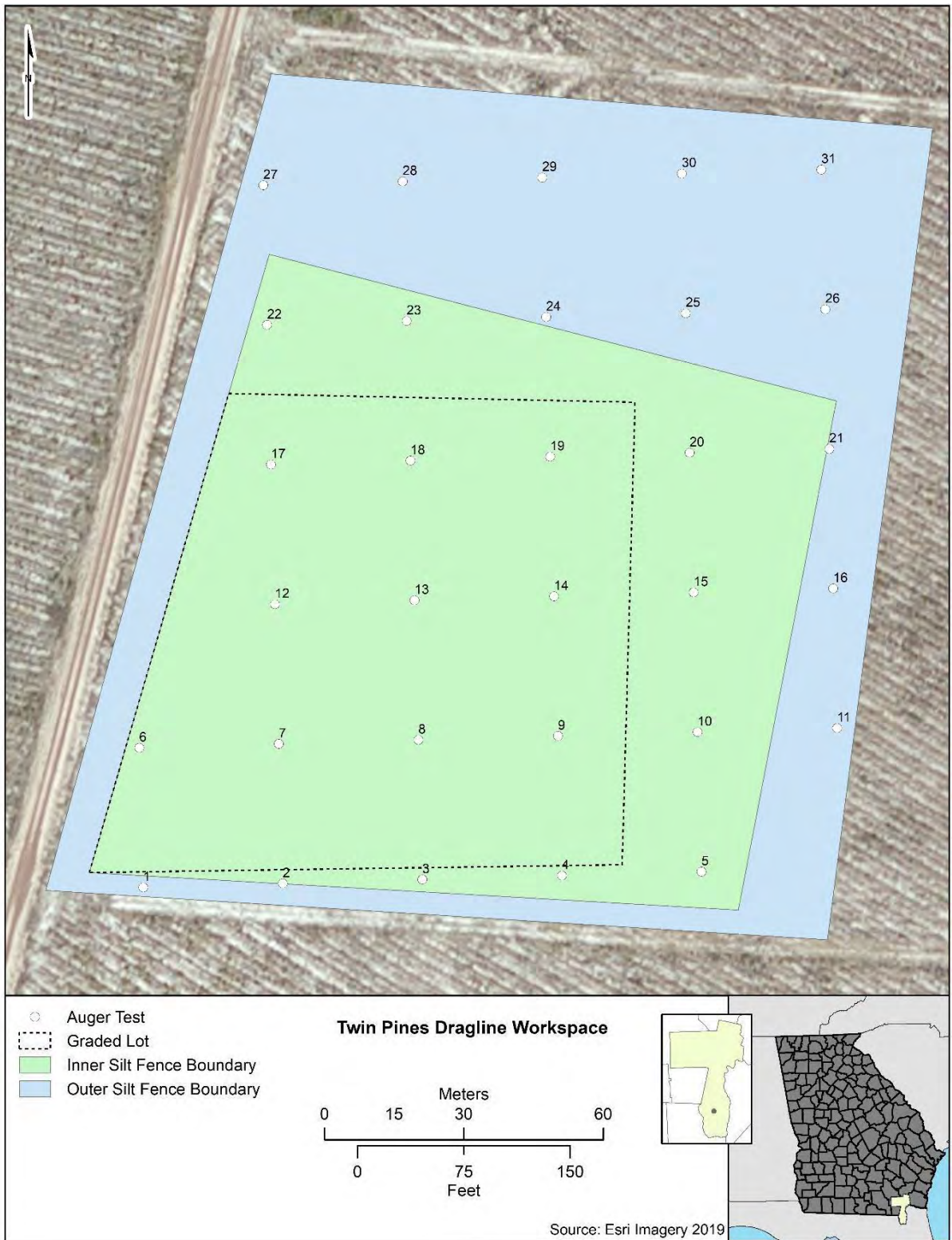




Soils within the workspace consisted of deeply stratified sands overlaying a water table typically present between 100 and 140 centimeters below surface (cmbs). Within one-third of the workspace, a non-local fill of yellow (10YR 8/6) sand and crushed limestone gravel had been recently placed and graded for a work surface; this layer typically extended between 30 and 40 cmbs and was removed prior to augering to reveal the natural ground surface. Figure 2 displays the extent of this graded area. Natural topsoil consisted of a dark gray (10YR 4/1) sand to a depth between 20 and 40 cmbs. Underneath this horizon were either grayish brown (10YR 5/2) or gray (10 YR 5/1) sands that extended to a depth between 60 and 80 cmbs. A very dark grayish brown (10YR 3/2) spodic hardpan sand was encountered between 60 and 100 cmbs; during initial Phase I shovel testing, this layer often coincided with the water table. Beneath this spodic layer, soils varied throughout the project area. In some cases, auger tests became inundated at this layer. In others, soils consisted of dark yellowish brown (10YR 4/4) sand layer that typically extended 20 to 30 centimeters before transitioning to a dark gray (10YR 4/1) hydric sand that was inundated. A secondary layer of spodic hardpan sands were encountered beneath the first at an extent of 110 to 120 cmbs in a small number of auger tests. When soils were saturated to the point where they could longer be retained within the bucket auger, the test was terminated.



**Figure 1.** Aerial image of the Twin Pines dragline workspace along T-Model Road in Charlton County, Georgia.



**Figure 2.** Detail map of Twin Pines dragline workspace depicting auger test locations, interior and exterior silt fencing boundaries, and the graded lot.