

# ECOSWF COMMENTS OF WHAT AN EIS SHOULD include

## U.S. Army Corps of Engineers AREAWIDE ENVIRONMENTAL IMPACT STATEMENT

The Corps should study the cumulative environmental impacts past, current and future of all phosphate lands in the Central Florida Phosphate District (CFPD) as well as the cumulative environmental impacts on associated lands outside the CFPD. More precisely, Charlotte County and all of Sarasota County should be included when accessing cumulative environmental impacts from past, current and future mining activities. Charlotte County is down stream and down wind of mining occurring and potential mining in the CFPD. Sarasota County is both hydrologically down gradient and is often a recipient of winds from the east.

The environmental impacts should not be limited to those areas within the CFPD which are economically feasible to mine. Economical feasibility changes from day to day. The Environmental Confederation of Southwest Florida along with other groups, governments and individuals requested the Army Corps of Engineers conduct an area wide EIS twenty-one years ago when IMC wanted to begin mining Pine Level (now know as the DeSoto mine). It is unlikely another EIS will be undertaken any time in the near future. It would be a disservice to all parties to not take advantage of this opportunity to access cumulative phosphate impacts on the region.

The Corps' health risk assessment methodology should be designed to develop and present the key determinants of risk. Risk is a function of (1) the physical and chemical characteristics of phosphate mining (e.g. particle sizes, chemical concentrations), (2) the manner in which phosphate mining is managed, and (3) site specific environmental conditions (e.g. recharge area, upstream of Charlotte Harbor, Southern Water Use Caution Area) and proximity to potential receptors (e.g. surface water, drinking water wells, wetlands).

Screening criteria can be divided into two main categories: (1) criteria to compare to constituent concentrations measured in solid samples and (2) criteria to compare to constituents measured in liquid and leachate samples, or in extract samples from solids. The screening criteria compared in solid samples include criteria that reflect the potential hazards to human health via inhalation, soil ingestion, and multiple radiation exposure pathways as well as a criterion that reflects the potential for air quality degradation.

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