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July 11, 2007

TO: District Engineer & David S. Hobbie, Regulatory Division
US Army Corps of Engineers, Jacksonville District,
10117 Princess Palm Drive, Suite 120,
Tampa, FL 33610-8300

ATTENTION: Melinda G. Hogan @saj02.usace.army.mil
PH: 813-769-7066

RE: Public Comments on:
Sec. 404, CWA: PERMIT Application No. SAJ-1997-4099-IP-MGH
South Ft. Meade Phosphate Mine Project (21 years of mining on 10,885 acres)

Dear District Engineer & Mr. Hobbie:

Thank you for the opportunity to provide my input. I have read your Public Notice (cited above) and I have listed several relevant comments I would like for you to consider regarding this new Mine permit:

1. SCOPE of the Project:

- This 21 year long, 10,885 acre Phosphate Strip mining project (About 17 square miles) is very large and will be operational with required reclamation monitoring until at least 2030.
- The phosphate strip mining dragline process is a dinosaur. It has been used by the Phosphate Industry in Florida's Bone Valley to dig out matrix for more than 80 years. It is well documented as *the most intense and physically destructive disturbance of lands possible*. Dragline mining permanently destroys wetlands & uplands and all their natural functions, by ripping out all of the earth (down to depths of 50-70 feet) in their quest to mine for matrix.
- Wetlands Lost: This project proposes to fully destroy: 511 acres of functional wetlands, 46 acres of open water & ditches and 55,000 linear ft (10.4 linear miles) of stream channels. This is unacceptable. The President in 2002 stated emphatically, the goal for the EPA is simply: NO MORE LOSS OF WETLANDS. The ACOE signed up to that goal. While *Mitigation is an option for phosphate mining, it is not a realistic or viable option for any Wetlands*. Why? They have not been able to re-build or to create a successful, functional, man-made wetland system and not able to fully restore all of its vital, natural, hydrological, biological and ecological systems with complete functionality. In short, until the Industry can successfully demonstrate that they can design and build a man-made wetlands system to work as well as it did when it was in its natural state and fully sustain all its functionality: Then: *ALL WETLANDS should be AVOIDED by MINING & PROTECTED from MINING*. RECOMMENDATION: Avoid any and all natural wetlands. Also ensure MOSAIC creates a permanent Conservation Easement natural plant and wildlife buffer corridor at least 1,000 feet wide along all streams & rivers. Do NOT permit any mining in the 100 year flood plain.

2. REQUIREMENT for a full blown EIS: Clearly the scope and intensity of the land destruction (Cited above) by this very large, 20 plus year long S. Ft Meade phosphate mining project requires a thorough and complete study of all potential environmental impacts. By NEPA rules this means the ACOE must fully examine all “Cumulative Impacts,” which by definition means all Past, Present and potential Future mining impacts of this project and nearby similar mining projects. It clearly means NOT only this one new S. Ft Meade project.

In addition, the older (same name) Ft. Meade Mine (A previously active Mine), sited north & next door, must be studied for cumulative impacts, too. At a minimum there are 3 other “active mines” now operating in the same watershed, which must be studied: South Pasture, Manson Jenkins & Wingate. Likewise, 2 more MOSAIC Mines are still awaiting ACOE: CWA Permits: Ona & Altman (Future Mines). They too must be studied for cumulative impacts. Why? S. FT. MEADE, ALTMAN & ONA will all be operating at the same time, in the same watershed, all directly impacting the Peace River.

Why is this so important? It is scientifically documented in the recent State DEP Peace River Cumulative Impact Study (PRCIS - Jan 2007) that phosphate mining (1975-2000) in the Peace River watershed has negatively impacted the quality, quantity and timing of the available surface water runoff supply to the Peace River (via Horse Creek, Charlie Creek, etc).

-- FACT: All of Charlotte Co. relies solely upon the Peace River for its drinking water supply. They pay for it and rely on it. All water impacts that mining creates must be analyzed & the new mine plan must be designed to minimize or eliminate these impacts. Only an EIS delivers this needed product.

-- FACT: Phosphate mining has reduced fish habitat and fish populations. (Source: PRCIS) Any impacts to fish populations or fish habitat must be documented by USF&W and minimized or eliminated. Only an EIS can deliver and satisfy this requirement.

3. WHY NEPA Rules REQUIRE an EIS: *Only a full blown EIS (not an EA) can or will satisfy NEPA rules requiring the ACOE to provide the public with full disclosure and accurate information on each and all environmental impacts that a strip mining project of this magnitude and scope will potentially create. Additionally, the ACOE must: fully document, review, analyze and present a list of realistic alternatives to these impacts. The public has a right to know all of the potential strip mining impacts to the watershed lands and their water supply. The public has a right to “watershed environmental homeland security” during/after mining: The right to expect that during & after the long (21 year) and intensely destructive mining activity period for the S. Ft Meade Mine, that: (1) The Peace River watershed will remain healthy, and (2) The Peace River watershed’s biological, ecological and hydrological natural systems will be protected and remain functionally sustainable.*

4. REQUEST for PUBLIC HEARINGS:

I live in Charlotte County on Coral Creek, which directly connects to Charlotte Harbor, which is downstream of and fed by the Peace River. This S. Ft Meade mine project will clearly impact the Peace River. I need to know how it may negatively impact my lifestyle and my property values. In addition, all of my drinking water is supplied by the Peace River Water Authority from their plant on Horse Creek in Arcadia. *I am directly impacted: If this mine pollutes or fouls the water, or harms the fishing, or reduces the Peace River water supply.* I have a need to know what the all impacts are and how the ACOE plans to minimize or avoid them. Under NEPA “Public Interest Test” rules, it is clear: Public Hearings are required for all citizens, if they may be impacted by ACOE projects. I urge you to please comply with my simple request to help me understand all impacts of this project .

REQUEST: Please conduct at least ONE (1) Public Hearing on this new 11,000 acre South Ft. Meade Mine project, in each of these 3 counties: Sarasota County, Charlotte County & Lee County.
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Thank you for reading and considering my input,

Jim Cooper