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Re: Conflict of Interest, AEIS for Phosphate Mining

Dear Agency Representatives:

The Ecology Party is providing comments in this letter regarding the Corps' Areawide Environmental Impact Statement (AEIS) for Phosphate Mining in Florida.

First, the Ecology Party of Florida strenuously objects to the Corps' hiring CH2M Hill to prepare an AEIS for at least three incidences of conflicts of interest.

1) Considering the fact that CH2M Hill derives much of its income from mining clients (see <http://www.ch2m.com/corporate/markets/mining/default.asp> or **Attachment A**) we do not

believe its employees will be objective and unbiased in their review. We submit that hiring a contractor that solicits new business and works for the mining industry, holding themselves out to use their “capabilities” to “achieve the company’s goals,” to evaluate the environmental harm done by the phosphate mining industry represents a clear conflict of interest apparent to even the densest observer.

2) Furthermore, CH2M Hill also is in the business of constructing “Aquifer Storage and Recovery” (“ASR”) injection wells, and pits also known as “reservoirs,” as alleged water sources in the wake of mining operations. It has a vested interest in continued mining that provides pits to “remediate” under the guise of providing water. See pages 30, 31, 38, 41, 42 of the USGS Reese report included as **Attachment B1**. Also see the Hillsboro Reservoir Siting Study included as **Attachment B2** and Cocoa’s Taylor Creek reservoir document included as **Attachment B3**.

3) The Ecology Party is also concerned about the conflict of interest that exists with CH2M Hill, their water-treatment contracts and the connection with phosphate mining. Specifically, the phosphate mining companies involved in the AEIS produce a form of fluoride that is a hazardous by-product of phosphate mining. Then, instead of disposing of that hazardous material safely, they sell it for disposal into the public water supplies of unsuspecting communities. See Mosaic’s Material Safety Data Sheet (MSDS, **Attachment C**). In 2003 CH2M Hill entered into a 50-year partnership with the US Army to fluoridate the water being used at Fort Campbell (http://www.ch2mhill.com/corporate/news_room/news_story.asp?story_id=336). CH2M also receives income as the contractor for municipal utilities in Florida that produce fluoridated water containing this hazardous by-product of phosphate mining which then is discharged into our surface waters and/or injected into ground waters without that hazardous material being removed. As examples, see the comment letter included as **Attachment D**. CH2M Hill therefore has these additional incentives for bias in evaluating the cumulative effects of phosphate mining.

Secondly, the Ecology Party is concerned about the myriad adverse environmental impacts of mining. See the peer-reviewed publication describing these impacts included in **Attachment E1** and **E2**.

Finally, members of the Ecology Party are suffering from particulate matter and diesel exhaust generated in great quantities by phosphate mining as are the flora and fauna in the areas affected. It’s well known that breathing dust is inimical to health. As an example, see **Attachment F** and <http://www.sciencedaily.com/releases/2010/05/100519112713.htm>

In conclusion, a new contractor – without any conflicts of interest - must be selected to conduct the AEIS for phosphate mining and the AEIS must address all of the adverse impacts related to the problems described above and in the attachments.

Sincerely,
Cara L. Campbell, Chair
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Attachments

- A CH2M Hill mining web page
- B1 Reese 2002 ASR Report
- B2 Hillsboro Reservoir Siting Study
- B3 Cocoa's Taylor Creek reservoir document
- C Mosaic MSDS for Fluoridation
- D Bacchus comment letter on proposed aquifer-injection of fluoridated water
- E1 Bacchus 2006 publication on mining impacts
- E2 Bacchus 2007 publication on impacts from hydroperiod alterations
- F Particulate matter affects heart health