

ManaSota-88
A Project for Environmental Quality

Team AEIS
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April 10, 2011

Mr. John Fellows
U.S. Army Corps of Engineers (ACOE)
10117 Princess Palm Avenue
Suite 120, Tampa, FL 33610-8302

Re: Draft Areawide Environmental Impact Statement (AEIS) for Phosphate Mining affecting Waters of the United States in the Central Florida Phosphate District (CFPD)

Dear Mr. Fellows:

ManaSota-88, Inc. (hereinafter, "ManaSota-88"), is a public interest conservation and environmental protection organization, which is a Florida not-for-profit corporation and a citizen of the State of Florida. The corporate purposes of ManaSota-88 include the protection and preservation of water quality and wildlife habitat in Manatee and Sarasota Counties and, therefore, commenting on the AEIS for Phosphate Mining is within ManaSota-88's general scope of interest and activity.

ManaSota-88, along with many other groups, has recommended that a regional phosphate environmental impact statement be done before consideration is given to any additional phosphate mine permits. The current review process focuses on the details of a proposed individual mine site without examining the combined impacts of past, present and future phosphate mining activities within the region.

ManaSota-88 does not believe the phosphate industry should be permitted to externalize the costs of their operations in the form of degraded water supplies, the release of toxic emissions from the processing of phosphate ores, and the radioactive waste disposal of phosphogypsum at the public's expense.

It is commendable that the ACOE is embarking on an AEIS, but this is only the first step in understanding the overall impacts the phosphate industry is having on Florida. The AEIS should not be viewed as a final product or review of this industry.

General Comments on the AEIS

The AEIS is one of the most significant reviews that the ACOE can perform for the

protection of Florida's water supply, air quality and the general well being and health of Florida's citizens. Because of the potential adverse impacts associated with phosphate mining and processing, it is important to have an adequate review of the industry before additional mining is permitted. It is far better to err on overprotecting the public and the environment rather than the reverse.

In order to properly understand the impact this industry is having on Florida, all aspects of the industry need to be reviewed in an **Industry-Wide** EIS. ManaSota-88 is concerned that the scope of the current AEIS is too narrow.

Phosphate is a non-renewable natural resource. The United States is a net exporter of phosphate. Because of this, ManaSota-88 is concerned about the rapid depletion of the phosphate supplies remaining in the United States. As a matter of national policy, it seems strategically reckless to continue to deplete our nation's very limited phosphate resources.

Florida's phosphate industry has enjoyed a phenomenal financial bonanza guaranteed to encourage rapid extraction of the resources aided by inadequate environmental laws and regulations.

To encourage the continued, rapid depletion of this essential non-renewable resource will not only result in serious economic and national security problems for the United States, it will leave Florida with perhaps centuries of costly water, air and land clean-up ahead of it that will far exceed whatever short-term profits and other indirect economic benefits of the industry there might be.

If some action is not taken to slow down the present extraction rate of phosphate yearly, Florida will not be a significant factor in the world supply structure within 25 to 35 years. Our country will increasingly have to rely on other countries with a majority of the world's supply for our phosphate supplies.

Phosphate Mining, Phosphogypsum Waste Disposal, and the Operation of Fertilizer Manufacturing Plants Must be Linked for Cumulative Impact Analysis.

The AEIS needs to address the effects of highly radioactive and toxic clay settling areas (toxic slime ponds), the health effects associated with the transportation of phosphate ore and gypsum, the public health and environmental impacts associated with phosphogypsum waste disposal, reagents used in mining and processing ores, and other phosphate waste disposal problems. The AEIS needs to be expanded to include a review of all aspects of the phosphate industry.

The health impacts of supporting activities such as electricity generation and phosphate ore transportation that will lead to a further deterioration of Florida's air quality must also be addressed.

As stated in the AEIS Notice of Intent, only three specific projects are being considered; the CF Industries' South Pasture Extension (SAJ-1993-01395), Mosaic Fertilizer LLC's Four Corners Surface Tract (1995-00794), and Mosaic Fertilizer LLC's Ona Mine (SAJ-1998-02067).

If the AEIS is limited to the mining impacts associated with these three proposed mines, then the direct, secondary and cumulative impacts of phosphate mining will not be understood.

Damage from the phosphate industry is not limited to Florida and other states mining and processing phosphate. Fertilizers and phosphates are a major culprit in water pollution nationwide.

Cumulative Impact Air Quality Study is Needed

As part of the AEIS, air quality Title V Permits need to be evaluated, this evaluation should include all air permits issued to phosphate related facilities, as well as any existing compliance plans, schedules of compliance, and compliance certifications. A review of any and all enforcement actions taken against any phosphate industry facility should be included in the AEIS.

Ambient state and federal air-quality standards are standards that do not protect our health but rather are standards designating the maximum tolerable concentrations in the ambient air of substances identified as pollutants. These national standards are minimum guidelines designed to be applicable to all areas in the state or country and reflect the nation's most congested, industrialized and polluted urban areas.

Because air pollutants often disperse over a wider geographical area than other types of contamination, it is possible that a relatively larger population may be exposed to any one of the pollutants released by the phosphate industry.

Sulfur dioxide and fluoride emissions from chemical processing plants and dust emissions from mining and clearing should be analyzed and included in the AEIS.

Emission and air quality standards need to be developed to enhance habitat quality beyond the minimum standards of maintaining state and federal air quality levels.

FDEP Division of Air Resource Management - Air Compliance and Enforcement Documents

18 Air Quality violations in the past 5 years (since 12/20/08) have occurred at Mosaic Plants. The Riverview Facility, Central Florida Mineral Operations, New Wales Facility, and Bartow Facility were out of compliance in 2008.

FDEP Division of Air Resource Management Air Permit Documents
Facility Emissions Summary (Allowable Tons Per Year)

Riverview	7140.88
Bartow	6545.00
Green bay	5747.70
New Wales	12917.94
South Pierce Plant	00
Central Florida Mining's Operations	4404.00
Total	36,755.52 Tons of Air Emissions
	PM = 4,307.9 tons
	SO2 = 30,633.1 tons
	NOX = 1,533.4 tons
	HAP = 223.12 tons
	CO = 46 tons
	VOC = 12 tons

Phosphate Industry Energy Consumption Rates Need to be Evaluated

The industry receives significant subsidies, which enable them to continue their massive pollution. The industry receives cheap water and preferential power rates.

The impacts of supporting phosphate activities such as electricity generation and transportation will permit further deterioration of the regions air quality.

The Overall Economic Impacts of the Phosphate Industry Need to be Assessed

The costs of pollution, loss of wetlands and other natural resources, and the contamination of surface waters have never been computed. If the latter were accomplished, the negative economic impact of phosphate mining would be even more apparent.

The phosphate industry cites the important advantages it brings to the state in taxes and employment, yet the long-term beneficial effect of mining on our economy will be slight. Mining has not played a significant role in the states economy since before 1960. Mining employs half the number it did 20 years ago, and now accounts for less than 0.5% of Florida's Gross State Product.

Whatever taxes are realized is small when compared to the costs of the damage the industry creates. If the present extraction of phosphate is permitted, Florida will have centuries of costly water, air and land cleanups ahead of it that will exceed any short-term profits and economic benefits of the industry.

The phosphate industry is creating an economic and environmental burden for the taxpayers of Florida in the form of increased air pollution, destruction of roads, depletion and degradation of drinking water supplies, loss of non-renewable mineral resources, and increased health costs.

A proper economic assessment can only be made when the following are considered: Costs for irretrievable use of fossil fuels to generate the electrical needs of the industry, the irretrievable commitment of chemicals used in processing, the hazards associated with redistribution of uranium resources and increased national security costs, the costs of contamination of surface waters, the costs of changes in hydrology, and costs of loss and disturbance of wetlands and other natural resources.

Spills from phosphate mining are not an everyday occurrence, but if phosphate mining continues to be permitted, the risk of spills must be accounted for. What is to be gained by allowing phosphate mining? Who gains? What is to be lost? Who loses? Who will write the check to pay for the consequences? And is the gain so great we're willing to take the risk?

The actual influence of phosphate on the state economy is minor when compared to the tourism, retirement and related support service industries, which are largely dependent upon a healthy environment and safe drinking water supplies. Clearly the net economic advantages of insuring a safe source of potable water far outweigh the modest economic gains that may be realized by phosphate mining.

The EPA Toxic Release Inventory (TRI) Data for Phosphate Facilities Need to be Included in the AEIS

The Environmental Protection Agency (EPA) released the 2008 Toxic Release Inventory (TRI) Data in December. EPA and Florida are required to annually collect data on toxic chemical releases and make the data available to the public in the TRI.

EPA EXPLORER TRI DATA 2008 (REPORTED IN POUNDS) for MOSAIC PHOSPHATE FACILITIES IN FLORIDA

Total On- and Off-site Disposal or Other Releases

Riverview -	233,435
Bartow - Mulberry	329,406
New Wales	1,198,647
South Pierce Plant	10,000
Total	1,771,488lbs of toxic waste generated

The Impact of Increased Mining Activity on the Tourist and Recreational Industry Needs to be Quantified

According to a study prepared for the Charlotte Harbor Estuary Program, tourism and recreation in the Peace River watershed provide us \$4.5 billion in sales. Commercial fishing adds \$38 million to the economy and agriculture adds another \$1.8 billion. Phosphate mining contributes a value of \$530 million. More than one million people are employed in the fishing, tourism and recreation and agriculture industries while phosphate strip mining has fewer than 10,000 jobs statewide (3,100 promised in the Peace River watershed).

The bottom line: the Peace River watershed has an economic value that approaches \$5 billion. These dollars come from the wetlands, meandering creeks, endangered and protected species, the Peace River and its tributaries.

No Phosphate Mining Should Be Permitted Within the Watersheds of Florida's Drinking Water Supplies.

These watersheds occupy a critical role in maintaining the health, safety and welfare of the people of Florida. Current permitting practices allow for phosphate mining in drinking water watersheds if best possible technologies and best operating practices are employed by the mining industry.

It is economically prohibitive to the taxpayers of Florida to allow mining in these watersheds if drinking water supplies are polluted.

All phosphate-mining activities below the 25-year flood plain elevation should be prohibited.

Radiation Standards for Post Reclamation Mined Lands Need to be Strengthened

Post - reclamation lands must not be permitted to exceed pre-mining, unenhanced natural background soil radium and gamma levels.

Radiation risks are not evenly distributed. Proximity to the mine site, wind direction, and other factors subject some to much higher risks than others.

It has been known for decades that land mined for phosphate exhibits higher radioactivity at the surface than it did before mining. The elevated levels of radiation pose a considerable threat to human health and the environment. Elevated concentrations of radium-226 and other radionuclides are known to occur in phosphate ores and mining wastes.

A goal of the AEIS should be to reduce or eliminate the radioactive materials at gyp piles at the chemical processing plants, clay settling areas from beneficiation and the

leach zone overlying the phosphate rock matrix that is redistributed by mining and reclamation areas.

Phosphate industry representatives frequently try to downplay the radiation risk associated with phosphate mining by comparing it with the risk of natural terrestrial and cosmic radiation.

Terrestrial and cosmic radiation is unavoidable and extremely harmful. Such unavoidable natural radiation can never justify avoidable man-induced radiation exposure. The mining of phosphate creates an avoidable radiation risk from which the exposed public receives no benefit.

Best Possible Technologies can reclaim mined land to pre-mining soil radium and gamma levels. Since the future land uses of the reclaimed lands are not known, all potential radiation exposures should be avoided.

Since it is both economically and technically feasible, the ACOE should require that radiation levels after mining not exceed those that existed before mining. Additional regulations are needed to address those instances when post-reclamation lands exceed pre-mining radioactive concentrations. The ACOE and state regulations pertaining to phosphate mining need to be written to include a non-degradation clause that will require lands be returned to essentially the same radiation levels that existed before mining.

Even if the industry had no recourse and could not return lands to pre-mining radiation levels, ManaSota-88 would not recommend the phosphate industry be permitted to increase radiation levels.

Clay Settling Areas (CSA) Must Be Eliminated

Clay Settling Areas are one of the significant environmental and public health threats associated with phosphate mining. Radioactive wastes from these ponds threaten surface and groundwater; the hazard of slime spills is a constant menace to essential public water supplies and natural systems. Elevated levels of fluorides, chromium, cadmium, arsenic and other toxins are commonly found in clay settling areas.

In 1997, the now bankrupted Mulberry Phosphate Corporation spilled a 35 mile stretch of acidic water in the Alafia River killing an estimated 1.3 million fish and shellfish and eliminated 377 acres of riverine vegetation.

The possibility of a slime pond dam break cannot be ruled out. When a pond ruptures their earthen impoundment's, the highly acidic, highly radioactive slime effluents completely annihilate all aquatic life in the receiving waters.

The highly acidic slime ponds also emit fluoride and radon gases, which are harmful

to humans, plants and animal tissues.

Slime ponds pose a significant threat to water quality and marine life. Although there has been a better dam law written for the state, the fact remains that a dam break is still possible, as an example in 1994 IMC's Hopewell Mine dam failed spilling nearly 500 million gallons in eastern Hillsborough County, muddying the Alafia River for two days. even after new mining rules were implemented. it remains to be seen if there is such a thing as safe slime storage.

Since the onset of phosphate mining in 1888, 126,000 acres of toxic slime ponds have been constructed throughout Florida. Approximately 81,000 acres of these slime ponds remain unclaimed. Nearly half of the slime ponds constructed in Florida remain as remnants of the environmental disaster that phosphate mining has had on the native landscape. Under the procedures practiced by the mining industry today, few of the slime ponds are fully reclaimed until mining operations are relocated or the mine closes. The average toxic slime pond is 500 acres in size and requires about 40 percent of the land area utilized by the phosphate mining operation.

The phosphate industry is asking us to risk the health and well being of future drinking water supplies, it only takes one slime pond failure to ruin a drinking water supply forever.

ManaSota-88 is convinced that there is no way mining can take place in the Myakka River, Lake Manatee and Peace River watersheds without affecting both the quality and quantity of water.

Even if all mining presently permitted and proposed for the Myakka River, Lake Manatee and Peace River watersheds goes according to plan with no unexpected problems or deliberate violations of company permits, because of run-off from mining tracts, permitted and unregulated discharges to surface and groundwater, water quality will still be degraded.

Cumulative impacts of mining operations on both water quantity and quality needs to be quantified. The long-term increased costs to area residents of procuring safe water to drink will be enormous. Additionally, over the long term, the trade-off of a good, reasonably priced water source in exchange for a relatively few phosphate mine tax dollars is going to pose a substantial threat to future residential growth.

Mining Activities Must Not Degrade Ground Water Quality

Strip mining destroys the surficial aquifer. The reduction of this base flow has a critical impact on the ability to provide drinking water. The loss of water from the surficial aquifer diverts water that normally seeps into the aquifer.

Although groundwater itself moves slowly, often only ten or twenty feet a year, the

contaminants move in unpredictable plumes, the behavior and flow rate of which are difficult and costly to measure. Moreover, once the contamination is detected few remedies are available, and these are often economically or technically unfeasible. Additional monitoring requirements for phosphate mining is needed.

Groundwater lacks the self-cleaning properties provided surface water by dilution, circulation and degradation by sunlight and can remain contaminated for centuries.

Water quality protection won't be accomplished by permitting thousands of tons of toxic and radioactive sandy slimes to be deposited in mine cuts which cut through to the surficial aquifer and beyond or permitting sandy slimes to be dumped in surface impoundment's.

Future Land Uses on Reclaimed Lands Need to be Identified

Agricultural land activities on reclaimed phosphate lands can concentrate radioactive contaminants in drinking water, citrus, vegetable foods and in the dairy products and the beef grown on mined-out lands.

The grazing of cattle and the resulting soil compaction reduces the air space between soil particles, reducing the amount of water the soil can absorb, and thus increases water runoff and soil erosion. Radioactive contaminants from the reclaimed lands will likely spread to those areas previously not having elevated radioactive levels

The type of agricultural uses permitted on reclaimed phosphate lands need to be closely regulated. Livestock and crops grown on reclaimed lands will likely exhibit an uptake of radioactive contaminates from the land.

The Myakka River is an Outstanding Florida Water (OFW) and Must Not Be Polluted

More than 22,000 acres of land has the potential to be mined for phosphate in the Myakka River Basin. Phosphate companies have interest in at least 22,375 acres of land in the Myakka River Basin not yet approved for mining.

In 1985, the Legislature of Florida adopted the Myakka River Wild and Scenic Designation and Preservation Act (Section 258.501, Florida Statutes), which designated a 34-mile segment of the Myakka River within Sarasota County as a "Florida wild and scenic" river. These designations are intended to provide additional protection to special waters recognized for their ecological significance, by providing the highest degree of protection under the State of Florida permitting policies.

ManaSota-88 is concerned that future phosphate mine discharges will degrade the Myakka River, generate low dissolved oxygen levels and significantly increase pollutant levels. Phosphate mining activities have the potential to adversely impact

downstream waters. It is critically important that every phosphate mine water quality discharge permit be reviewed by the ACOE to ensure the highest degree of protection for the Myakka River.

Additional requirements are necessary to study the direct and indirect impacts on: surface waters; ground waters; upland, wetland, aquatic, and estuarine habitats; listed species; and other natural system features in the Myakka River Basin.

All mining activities that degrade the OFW of the Myakka River must be prohibited. Because of the potential adverse impacts associated with phosphate mining, it is important that the ACOE have a clear understanding of the potential adverse impacts to the Myakka River before additional mining begins.

Phosphogypsum Generation and Waste Disposal Issues Need to be Included in the AEIS

There are additional environmental and health impacts associated with the processing of phosphate after it has been mined. Fertilizer plants generate large piles of radioactive phosphogypsum and significant amounts of corrosive hazardous acidic waste as a by-product of processing phosphate. The cumulative health effects of the radioactive exposures associated with phosphate mining, processing the phosphate ore, and storage of the radioactive phosphogypsum waste need to be assessed.

More stringent environmental regulation is needed to control the adverse impacts of phosphogypsum. Phosphate rock for central Florida has some of the highest levels of radiation in the United States. Allowing for the widespread distribution of phosphogypsum should be prohibited as this would lead to less oversight of a dangerous waste product.

Phosphogypsum has a high radium content. The lifetime cancer risk for adults resulting from exposure to this waste is one excess fatal cancer per 10,000 people. The risk for children is significantly higher. Radium can leach from gypsum stacks into subsurface aquifers, it can also be found in phosphogypsum used as a soil conditioner for agricultural purposes, it can be absorbed by plants and consumed by livestock and wildlife. Radium's 1630-year half-life from phosphogypsum stacks will likely remain a public health risk for generations to come.

As additional phosphate mining occurs within the Peace River Basin, what will be the ultimate fate of the phosphogypsum waste produced from additional phosphate extraction? Phosphate mining operations and phosphogypsum waste disposal analysis are not required in any federal, state or local permit. Cumulative impact analysis of phosphate extraction cannot possibly occur without linking mining operations to phosphogypsum waste disposal.

Gypsum ponds have been found to have cadmium, chromium and other heavy metals in excess of federal and state standards. It is not unusual to find gypsum pond pH levels as low as 1.5. Seepage from slimes can contain high levels of radionuclides and other toxins. Levels of radium as high as 2000 picocuries per liter are not unusual. The highly acidic gypsum ponds also emit fluoride and radon gases, which are harmful to humans, plants and animal tissues.

Issues Associated with Phosphogypsum include:

1. High Radionuclide Levels. Phosphate rock for Central Florida has some of the highest levels in the United States. Phosphogypsum waste resulting from the processing of phosphate rock contains an average of 30 pico curies per gram of radium 226. The use of central Florida phosphogypsum will unnecessarily expose workers, the environment, and the general public to otherwise avoidable radon and gamma radiation exposure.
2. Increased Health Risks. All uses of phosphogypsum can cause significant health risks. Allowing phosphogypsum to be used for construction or agricultural purposes will put the general public at an unacceptable risk, as the phosphogypsum will become widespread in its distribution. The radioactive decay of this material will emit particles that can cause increased cancer risks and unacceptable radiation levels in areas normally not having such problems.
3. Increased Groundwater Contamination. The Florida Department of Environmental Protection (DEP) has documented significant groundwater pollution contamination from phosphogypsum disposal. In addition to high radium 226 levels, central Florida phosphogypsum also contains significant amounts of sulfur and various heavy metals such as arsenic, barium, cadmium, and lead. Contaminated water and dissolved materials containing these toxins have the potential to seep from phosphogypsum used for construction or agricultural purposes and pollute the underlying aquifer.
4. Lack of State Regulatory Oversight. More stringent environmental regulation to control the adverse impacts of phosphogypsum is needed. Allowing for the widespread distribution of phosphogypsum will lead to less oversight of a dangerous waste product. The DEP lacks adequate regulations needed to protect the public and the environment from hazards associated with gypsum stacks and dispersal of phosphogypsum. Proper regulations requiring phosphate companies to make final disposition of gypsum wastes in an environmentally acceptable manner do not exist.

Post-mining Land Reclamation Requirements Need to be Strengthened

Reclamation is not the same as restoration and this distinction clearly needs to be made. For all tributary's of the Myakka and Peace River, restoration should be

performed, not just reclamation or mitigation. Restoration requirements for all lands within the 100-year flood plain and all tributaries should be included in the AEIS. No mining should occur within 1,000 feet of any river, stream or creek. Conservation easements should be required for all rivers, streams, creeks and wetlands. Hardwood wetlands should not be mined, as the technology does not exist to restore hardwood wetlands.

Clay settling areas have low infiltration, high surface runoff, and little base flow. There is clear and convincing evidence that phosphate mining has had a significant impact on the Peace River. Past phosphate mines have left behind a legacy of toxic slime ponds with soils that are less previous because of their clay content. Phosphate mining can, and has impacted the Peace River base flow. Ground water recharge and movement through a clay settling area is significantly less than in natural conditions. As early as 1993, it was known that water levels in clay settling areas respond more slowly to rainfall recharge.

Much of the mined-out land is reclaimed as lakes. While the industry has touted these lakes as good fishing areas and wildlife habitats, mining and subsequent reclamation reduce plant and animal diversity of community structures in the mining region. The number of plants and animals in an area is directly related to the number of vegetation types. The same factors that affect the habitat quality of reclaimed land areas also affect the habitat quality of adjacent and nearby wetlands that are not mined.

Additional Studies are Needed

The Environmental Protection Agency (EPA) and the ACOE should conduct additional studies to determine the long term health effects of exposure to toxic and hazardous substances associated with current and former phosphate mining and processing sites located in Florida.

EPA has stated that as many as 40,000 people living on former phosphate mining lands in central Florida are being exposed to dangerous levels of radiation from contaminated indoor air in central Florida homes. 21 former phosphate-mining sites may be eligible as Superfund candidates for EPA's National Priorities List.

Additional studies needed to be done during the AEIS include:

1. Conduct a comprehensive health risk analysis on all Florida phosphate reclaimed mine sites. 14 reclaimed phosphate lands are currently in use by the public as recreational areas throughout the state. Additional testing is needed to determine the extent and source of pollution at these reclaimed mine sites.
2. Conduct inorganic and radiochemical surface water and fish tissue sampling in an on-going monitoring process at all former phosphate sites currently accessible to the public for fishing.

The contaminated sites may, adversely impact several endangered or threatened species, as well as anyone consuming fish caught at the former phosphate mines.

3. Conduct an ecological risk assessment at the former phosphate mine sites.

Radium-226 and radium-228 have been identified at levels above the EPA cancer risk screening concentration of 0.16 and 0.19 pCi/L in the on-site at the Tenoroc Fish Management Area (TFMA).

Land mined for phosphate exhibits higher radioactivity at the surface than it did before mining. Phosphate mining exposes radioactive materials and can increase surface and ground water radiation levels. The elevated levels of radiation identified at TFMA poses a considerable threat to human health and the environment.

4. Conduct measurements for the purpose of determining employee exposure to toxic and hazardous substances, and the potential for long-term health effects of living or working on-site at TFMA and other former phosphate mine sites. EPA should determine if TMFA is in compliance with the Occupational Safety and Health Act of 1970 and OSHA Regulations (Standards - 29 CFR).
5. The elimination of clay settling areas should be an achievable goal of the AEIS. Studies paid for by the phosphate industry should investigate changes in processing procedures and reclamation procedures to eliminate CSA's.
6. Radiological impact assessment on the public and the environmental as a result of changes in the radioactive content of water resources should be done. The redistribution of Uranium 238, radium - 226 and radon - 222 needs to be analyzed. Radium - 226 can be ingested through drinking water, Radon - 222 can be breathed in associated with dust from mining operations.
7. The long-term effects of low radiation doses resulting from future mining activities needs to be studied.
8. Remediation standards for soils or structures identified as having unacceptable radiation or radon levels need to be assessed.
9. Cancer mortality rates in the Central Florida Phosphate region for the bone valley region need to be included in the AEIS.

Sincerely,

Glenn Compton
Chairman, ManaSota-88

