

October 30, 2024. The Environmental

Confederation of Southwest Florida (ECOSWF) is an umbrella environmental organization consisting of other environmental organizations and individuals.

ECOSWF offers this comment re using phospogypsum for road base:

Phospogypsum stacks are lined. Acid water is captured. The use of phospogypsum for road base WILL NOT have a capture mechanism for any lateral seepage that occurs to the road base allowing the acidic water to flow where it wants to go.

How would lateral seepage occur? When the water level on either side of the road is greater than the level of water on the other side of the road, the water pressure will move the water to the lower side and erode the road base.

This actually happened in Sarasota County on Fruitville Road in front of the Hi Hat Ranch property. The water used for vegetable bed preparation raises the water level to land surface so the sand can be made into beds as plastic covering is applied. The water moved laterally off site and eroded the road base. It did not flow over the road, but under the road. While water from bed preparation would not be an issue, certainly large rainfall events and hurricanes would provide excess water as well as any hydrological flows that the Mosaic has changed through its mining operations.

Lateral flow waters once entering a stream or even a ditch can travel for miles. Flatford Swamp's lateral seepage at the headwaters of the Myakka River in Manatee County, Florida went many miles downstream and killed trees from drowning them in Crowley Museum, Sarasota, Fl and Myakka River State Park in Sarasota County.

Lateral seepage is generally not recognized because it is under land surface and you can't obviously see it, but it is very real.

Anyone coming in contact with this lateral seepage water would be exposed to radiation risks: those people working there and those people exposed from runoff. There are also the aerosols that would be dispersed and any water aerosols are dispersed into the atmosphere.

This type of exposure has not been assessed and therefore the request should be denied.

Additionally, a lined gyp stack with water quality monitoring is not in any way comparable to an unlined road base.

Thank you for your consideration,
Becky Ayeche
President
Environmental Confederation of Southwest Florida