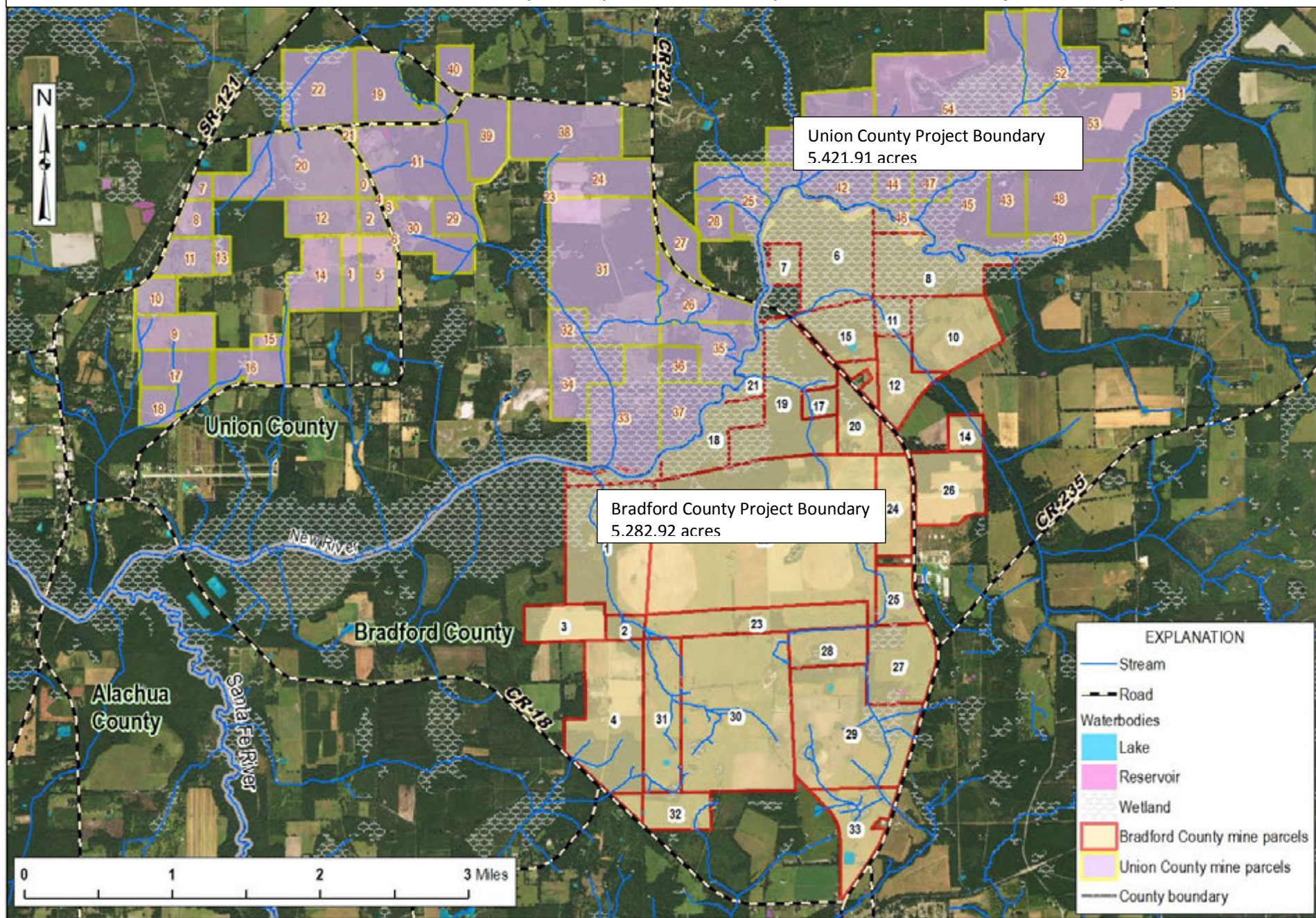


# Bradford/Union County Proposed Phosphate Mine Project Map



HPS II mine parcels in Bradford and Union County, Florida. Parcel label is the feature class attribute Parcel\_ID, which is the key to the accompanying attribute tables. Mine parcels were selected based on the HPS II mine boundary obtained from the HPS II web site.



# The Future of the Santa Fe River Basin?

The Peace River watershed lies in west central Florida about forty miles east of the Tampa Bay area.



## Phosphate Mine Bullet Points and Request

- The proposed mine, by HPS II Enterprises, straddles New River, which divides Union and Bradford Counties. It is a major tributary of the Santa Fe River, upstream from Columbia County.
- The mine poses substantial water impacts on the Santa Fe River system, including harmful draw-down and pollution. The river is a major economic resource for its adjacent area.
- The Santa Fe River System was designated an Outstanding Florida Water and “Special Water” in 1984. It is currently not meeting its TDML for total nitrates and dissolved oxygen and is now determined as “impaired”.
- The river is not meeting its Minimum Flows and Levels at this time. The mine would need approximately 20 Million Gallons of water/day
- New River is designated critical habitat for the federally endangered Oval Pigtoe mussel.
- HPS II Enterprises has proven to be irresponsible in following rules and regulations (see mine information,) and the chances of an environmental catastrophe are high.
- Union Co. has enacted a moratorium on mine permits, but Bradford has done nothing to stop the mine. Alachua Co. has publicly declared its intention to sue if any permits are granted.
- Chris Bird, director of [Alachua County Environmental Protection Department](#), has stated that the mine poses the greatest threat to the Santa Fe River that he has seen in his tenure of many years with Alachua County. Alachua County has drafted a strong letter opposing this threat and has sent it to many agencies and municipalities in the area.
- Mr. Bird has requested that OSFR help garner support for this cause to further strengthen the position of Alachua County. As some of you know who helped, we were warmly received by the City of High Springs, who is in the process of drafting a chair letter of support.
- A Chair letter to various local and state agencies from the Columbia County stating support of Alachua County’s opposition to the mine would strengthen the county’s position.
- OSFR is requesting that the Columbia County commissioners draft a letter to Union and Bradford County and The Suwannee River Water Management District supporting Alachua County in their opposition to the proposed mine.

# The Phosphate Mine in Bradford and Union Counties Proposed by HPS II Company

In the spring of 2016, HPS II Enterprises proposed a 10,775 acre mine bordering the Santa Fe River, and straddling New River, a major tributary which divides Union and Bradford Counties.

Following overwhelming citizen opposition, Union Co. quickly voted in a one-year moratorium on mine permit applications on April 18, 2016, giving them time to revise outdated and inadequate Land Development Regulations (LDRs). Bradford Co. did not issue a moratorium and soon after, on April 29, 2016, the mining company submitted to them a mine permit application. A workshop was scheduled and canceled, enraging the opposition.

At this time Alachua Co. made a strong stance against the mine, sending a letter of concern to several state and federal agencies. They addressed the Bradford commissioners and offered assistance in revising the LDRs. The mine has not been discussed at the board meetings by commissioners since May 19, 2016 and the current status is unknown to the public.

Lawyers for the Center for Biological Diversity, a national environmental group, have determined that the mine application was handled incorrectly by the Bradford County commissioners. The lawyers have asked them to enact a moratorium on processing mining applications. With ample documentation, they give legal precedent in Florida for enacting moratoria after an application has been submitted.

There are many reasons to reject this phosphate mine. Phosphate mines pollute, destroy terrain and contaminate the aquifer. One has only to look to Polk Co. for the most recent environmental catastrophe. Mosaic Company has had previous spills and contaminations, and last year were fined almost two BILLION dollars. They continue to pollute. A mine on the river upstream from High Springs would jeopardize our greatest natural resource, our river, springs and aquifer.

The phosphate industry is one of the most polluting industries we have in Florida. It's a cradle-to-grave operation of pollution, and phosphogypsum is the grave," said Glenn Compton, from the environmental group ManaSota-88. The 1.8 billion settlement "is a small drop in the bucket of what the industry is doing to the State of Florida."

The Santa Fe River has many layers of special protections. It is designated an "Outstanding Florida Water," a "Special Water". It is an "impaired waterway," meaning people have damaged it by over-drawing and allowing too much fertilizer into it. The river is protected by Minimum Flows and Levels, which are already not being met. Yet the mine will have to withdraw about 20 MGD to operate. These state-declared designations are in the Florida Statutes and give it greater legal protection than most Florida streams. The New River area is also designated an Area of Critical Habitat for the Oval Pigtoe Mussel and other threatened wildlife species. The river is also a Water Resource Caution Area.

The North Central Florida Regional Planning Council has previously advised the Bradford Board of Commissioners that their county's LDRs are inadequate to address a large-scale mine.

The phosphate industry itself provides much of the ammunition against it. The Florida Industrial and Phosphate Research Institute (FIPR Institute) tells us that up to 40 percent of the land that has been mined is being left in clay settling areas with no attempt at reclamation. About 340,000 acres have already been mined in Florida and less than 62,000 have been reclaimed.

Mining operations have gone bankrupt, leaving huge messes for the state to clean up at the taxpayer's expense. Also at the environment's expense—Several years ago the DEP allowed dumping 295 million gallons of poisoned wastewater into Bishop's Harbor, just south of Tampa.

The abandoned gypsum stacks had to be drained so the state negotiated for weeks with the EPA to allow 240 million gallons to be dumped 100 miles out into the Gulf of Mexico.

They admit that counties "...such as Hardee...) are trying to find income-generating uses for mined and reclaimed land. "The ponds where the waste clays are dumped after they are separated from the ore cover more than 100,000 acres and it can take three to five years for a full settling area to crust into a land that can be used—and even then its use is limited since the clay below the crust is the consistency of pudding.

Contrary to what Mosaic Company says, we do not need the phosphate industry in Florida. Scientists at Columbia University say:

*"phosphorus is fundamental to all living things. It is vital for food production. Phosphorus cannot be manufactured or destroyed, and there is no substitute or synthetic version of it available.*

*In fact, phosphorus is a renewable resource and there is plenty of it left on earth. Animals and humans excrete almost 100 percent of the phosphorus they consume in food. All of the most reliable estimate show that we have enough phosphate rock resources to last between 300 and 400 more years."*

The concerns for the safety of the river are increased because HPS II Enterprises is a new company with no experience in what it is trying to do. They have already proven to break the rules and cut corners, disregarding proper legal procedures.

They already have three violations in the short time they have been in business. They were cited on March 15, 2016 by the Suwannee River Water Management District for engaging in dredge and fill activities in wetlands with no permits, making illegal drainage ditches. They admitted, also in March, to the construction of 38 water wells without permits, and in June, 2016, they were cited for digging a well without permission on property they did not own.

These violations are the earmarks of a company which has no regard for obeying regulations which exist to protect the welfare of others. This irresponsible company should not be allowed to put at risk the natural resources which we all enjoy and from which our community benefits. The Santa Fe River and surrounding springs are the engine which drives our economy and brings people to our area.

Once the aquifer is contaminated, it cannot be restored in our lifetime.



# Santa Fe and Ichetucknee River and Spring Flows are Declining

## *Key Findings:*

- Average flows in the Lower Santa Fe and Ichetucknee rivers and in their springs have declined by an estimated 30 to 40 percent;*
- A significant portion of these flow declines can be attributed to an increase in the consumptive water uses throughout North Florida;*
- These flow declines are well beyond the range recognized as “significant harm”.*



# Santa Fe Springs Are the Backbone of Summer Recreation



Poe,  
Gilchrist  
Blue, and  
Ginnie  
Springs  
have high  
recreational  
use



# Santa Fe Springs Have High Economic Value

- *Directly Dependent upon Springs/River:*
  - *Private Springs – 260,000 people per year (estimated as \$5,200,000)*
  - *Dive Shops/Outfitters – 10,000 people per year (estimated as \$500,000)*
  - *Canoe/Kayak Outfitters – 15,000 people per year (estimated as \$300,000)*
- *Indirectly Dependent upon the Springs/River:*
  - *Local Businesses – 100,000 patrons per year (estimated as \$3,000,000)*
  - *Local Lodging – 20,000 guests per year (estimated as \$1,000,000)*
  - *Water Bottlers - \$10+ million per year*
- *Total Estimated Economic Impact: \$20+ million per year*



# Springs Protection Goals: ***Restore the Flow and Quality!***



Gainesville Sun



# **Alachua County Board of County Commissioners**

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Robert Hutchinson, *Chair*  
Ken Cornell, *Vice Chair*  
Mike Byerly  
Charles "Chuck" Chestnut, IV  
Lee Pinkoson

**Administration**  
Dr. Lee A. Niblock, CM  
*County Manager*

May 5, 2016

Donald Quincey Jr., Chairman  
Suwannee River Water Management District  
9225 CR 49  
Live Oak, FL 32060

RE: Proposed HPSII Phosphate Mine, Bradford and Union Counties

Dear Chairman Quincey,

I am writing on behalf of the Alachua County Commission to express Alachua County's concerns regarding adverse impacts associated with the proposed HPSII phosphate mine in southern Bradford and Union Counties.

We understand that the proposed mine will ultimately require approval according to Union County and Bradford County land use authorities. However, water drainage from the proposed mine will ultimately discharge to the Santa Fe River, Alachua County's northern boundary with Bradford County and Union County. Therefore, Alachua County intends to engage in the local, water management district, state, and federal permit review processes.

The State of Florida has designated the Santa Fe River an Outstanding Florida Water and an impaired water body that is subject to water pollution discharge prohibitions and established restoration goals according to a stakeholder developed Basin Management Action Plan. Earlier this year the Florida Legislature designated Outstanding Florida Springs status to springs on the Santa Fe River, including Hornsby Springs, Treehouse Springs, and Poe Springs. The Santa Fe River and its springs have become international destinations for water resource based tourism.

Alachua County, the Florida Department of Environmental Protection, the Suwannee River Water Management District, and the Alachua Conservation Trust manage significant conservation lands adjacent to the downstream Santa Fe River. These public land assets are dependent upon exceptional water quality.

If possible, please provide us with a District staff point of contact with whom we can discuss the District's involvement in the proposed mine permitting process.



If you need further information regarding Alachua County's concerns, please contact our County's Environmental Protection Director Chris Bird at [Chris@alachuacounty.us](mailto:Chris@alachuacounty.us) or 352-264-6800. Thank you in advance for your assistance.

Sincerely,



Robert Hutchinson, Chair  
Alachua County Commission  
Chr16.066

RH/JCB/jcb

cc: Board of County Commissioners  
Dr. Lee A. Niblock, County Manager  
Michele Lieberman, County Attorney  
Chris Bird, Environmental Protection Director  
Noah Valenstine, Executive Director SRWMD



# **Alachua County**

## **Board of County Commissioners**

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Robert Hutchinson, *Chair*  
Ken Cornell, *Vice Chair*  
Mike Byerly  
Charles "Chuck" Chestnut, IV  
Lee Pinkoson

**Administration**  
Dr. Lee A. Niblock, CM  
*County Manager*

May 5, 2016

Chairwoman Karen Cossey  
Union County Board of County Commissioners  
15 NE 1<sup>st</sup> Street  
Lake Butler, FL 32054

RE: Proposed HPSII Phosphate Mine, Bradford and Union Counties

Dear Chairwoman Cossey,

I am writing on behalf of the Alachua County Commission to express Alachua County's concerns regarding adverse impacts associated with the proposed HPSII phosphate mine in southern Bradford and Union Counties.

We commend the prudence of the Union County Board of County Commissioners in recently adopting a temporary moratorium on new phosphate mines to allow your county to determine appropriate safeguards for such land use activities. Upon your request, we would be pleased to offer the technical assistance of our staff as you conduct your evaluation of local government roles during the moratorium.

We understand that the proposed mine will ultimately require approval according to Union County and Bradford County land use authorities. However, water drainage from the proposed mine will ultimately discharge to the Santa Fe River, Alachua County's northern boundary with Bradford County and Union County. Therefore, Alachua County intends to engage in the local, state, and federal permit review processes.

The State of Florida has designated the Santa Fe River an Outstanding Florida Water and an impaired water body that is subject to water pollution discharge prohibitions and established restoration goals according to a stakeholder developed Basin Management Action Plan. Earlier this year the Florida Legislature designated Outstanding Florida Springs status to springs on the Santa Fe River, including Hornsby Springs, Treehouse Springs, and Poe Springs. The Santa Fe River and its springs have become international destinations for water resource based tourism.

Alachua County, the Florida Department of Environmental Protection, the Suwannee River Water Management District, and the Alachua Conservation Trust manage significant conservation lands adjacent to the downstream Santa Fe River. These public land assets are dependent upon exceptional water quality.



We look forward to working with Union County and Bradford County to avoid adverse impacts from the proposed mine. If possible, please provide us with a Union County staff point of contact regarding your moratorium review process. If you need further information regarding Alachua County's concerns, please contact our County's Environmental Protection Director Chris Bird at [Chris@alachuacounty.us](mailto:Chris@alachuacounty.us) or 352-264-6800.

Thank you in advance for your assistance.

Sincerely,



Robert Hutchinson, Chair  
Alachua County Commission  
Chr16.067

RH/JCB/jcb

cc: Board of County Commissioners  
Dr. Lee A. Niblock, County Manager  
Michele Lieberman, County Attorney  
Chris Bird, Environmental Protection Director



# **Alachua County Board of County Commissioners**

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Robert Hutchinson, *Chair*  
Ken Cornell, *Vice Chair*  
Mike Byerly  
Charles "Chuck" Chestnut, IV  
Lee Pinkoson

**Administration**  
Dr. Lee A. Niblock, CM  
*County Manager*

May 5, 2016

Chairman Eddie J. Lewis  
Bradford County Board of County Commissioners  
945 North Temple Avenue  
Starke, FL 32091

RE: Proposed HPSII Phosphate Mine, Bradford County

Dear Chairman Lewis,

I am writing on behalf of the Alachua County Commission to express Alachua County's concerns regarding adverse impacts associated with the proposed HPSII phosphate mine in Bradford County.

We appreciate the Bradford County Attorney's participation in Alachua County's May 3, 2016 special meeting and look forward to continuing a constructive dialogue on this challenging issue. We encourage Bradford County to establish appropriate safeguards to avoid adverse mining impacts in the New River Basin, especially for water resources. Upon your request, we would be pleased to offer the technical assistance of our staff as you evaluate opportunities to strengthen your local framework.

We understand that the proposed mine will require approval according to Bradford County's land use authority. However, water drainage from the proposed mine will ultimately discharge to the Santa Fe River, Alachua County's northern boundary with Bradford County. Therefore, Alachua County intends to engage in the local, state, and federal permit review processes.

The State of Florida has designated the Santa Fe River an Outstanding Florida Water and an impaired water body that is subject to water pollution discharge prohibitions and established restoration goals according to a stakeholder developed Basin Management Action Plan. Earlier this year the Florida Legislature designated Outstanding Florida Springs status to springs on the Santa Fe River, including Hornsby Springs, Treehouse Springs, and Poe Springs. The Santa Fe River and its springs have become international destinations for water resource based tourism.

Alachua County, the Florida Department of Environmental Protection, the Suwannee River Water Management District, and the Alachua Conservation Trust manage significant conservation lands adjacent



to the downstream Santa Fe River. These public land assets are dependent upon exceptional water quality.

We look forward to working with Bradford County to avoid adverse impacts from the proposed mine. If possible, please provide us with a Bradford County staff point of contact regarding your mine permitting process. If you need further information regarding Alachua County's concerns, please contact our County's Environmental Protection Director Chris Bird at [Chris@alachuacounty.us](mailto:Chris@alachuacounty.us) or 352-264-6800

Sincerely,



Robert Hutchinson, Chair  
Alachua County Commission  
Chr16.070

RH/JCB/jcb

cc: Board of County Commissioners  
Dr. Lee A. Niblock, County Manager  
Michele Lieberman, County Attorney  
Chris Bird, Environmental Protection Director  
Brad Carter, Bradford County Manager  
Will Sexton, Bradford County Attorney