

" Determining the cumulative environmental consequences of an action requires delineating the cause-and-effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern....Then **they must describe the response of the resource to this environmental change**....." [page vi]

".....**Address the sustainability of resources, ecosystems, and human communities**." [Table E-1, page vii, emphasis added]

3. The introductory chapter of the Cumulative Effects Report elucidates the purpose of analyzing cumulative impacts. Table 1-1 in that chapter provides a list of federal agencies, with examples of the types of situations in which cumulative impacts are (or should be) involved. The COE is the first agency listed in Table 1-1. The example provided in Table 1-1, for the COE's consideration of cumulative impacts is provided below, following the Congressional testimony excerpt explaining the purpose of evaluating cumulative impacts, and other relevant excerpts from the introductory chapter:

"...as a result of the failure to formulate a comprehensive national environmental policy...**environmental problems are only dealt with when they reach crisis proportions**.... Important decisions concerning the use and shape of man's environment continue to be made in small but steady increments which perpetuate requirements." [page 2, emphasis added]

"...Cumulative effects analysis should be the tool for federal agencies to **evaluate the implications of even project-level environmental assessments (EAs) on regional resources**." [page 3, emphasis added]

incremental loss of wetlands under the national permit to dredge and fill and from land subsidence" [Table 1-1, page 2, emphasis added]

4. The fact the Floridan aquifer system has suffered irreparable damage in the form of subsidence, contamination, and depletion, to the point where Congress has authorized approximately \$8 billion dollars in tax relief for experimental remedies in south Florida alone, should be sufficient evidence to conclude **the environmental problems in Florida have reached crisis proportions**. The reason for this crisis can be found in the fact that cumulative impacts have not been considered. Figure 1-2 of the Cumulative Effects Report is a flow chart depicting the results of a review of 89 EAs announced in the Federal Register during the first six months of 1992, to determine how many EAs correctly treated cumulative impacts. Only three were found to have correctly considered cumulative impacts.

5. The principles of cumulative impacts are further summarized in Table 1-2. With respect to the information provided in Table 1-2 and this case, the "given resource" is the Floridan aquifer system. Some of the more relevant parts of Table 1-2, with respect to the issues addressed in this affidavit, are as follows:

"2. Cumulative effects are the total effect, including both direct and indirect effects, on a **given resource**, ecosystem, and human community of all actions taken, no matter who (federal, nonfederal, or private) has taken the actions." [emphasis added]

"5. Cumulative effects on a given resource, ecosystem, and human community are rarely aligned with political or administrative boundaries."

"7. Cumulative effects may last for many years beyond the life of the action that caused the effects....(e.g., acid mine drainage, radioactive waste contamination, **species extinctions**). **Cumulative effects analysis needs to apply the best science** and forecasting techniques **to assess potential catastrophic consequences in the future**." [emphasis added]

"8. **Each affected resource, ecosystem, and human community must be analyzed in terms of its**