

It is important to note that the General Categories of projects routinely authorized by the COE in Florida result in virtually all of the cumulative effects issues listed under Item 7 of Table 2-1 of the Cumulative Effects Report. The discussion regarding identifying geographic boundaries uses Figure 21 of the Cumulative Effects Report to illustrate the "utility of using the ecologically relevant watershed boundary of the Anacostia River basin rather than the political boundaries of local governments to develop restoration plans." Although watersheds are logical geographic units in many areas of the U. S., this is not the case in Florida. Extensive groundwater mining of the karst Floridan aquifer system does not recognize watershed boundaries any more than it recognizes political boundaries, and has resulted in breached groundwater "divides". Consequently, geographic boundaries of resources in Florida now must be expanded to coincide with the natural boundaries of the regional aquifer system. Table 2-2 of the Cumulative Effects Report illustrates how an aquifer is an appropriate geographic area for a cumulative impacts analysis involving water quality. In Florida, the regional aquifer also is an appropriate geographic area for evaluating virtually every other resource listed in Table 2-2 of the Cumulative Effects Report. The following quote from Chapter 2 of the Cumulative Effects Report reiterates the importance of expanded geographic boundaries for a scientifically-based cumulative impacts analysis:

"...Analyzing cumulative effects differs from the traditional approach to environmental impact assessment because it requires the analyst to expand the geographic boundaries and extend the time frame to encompass additional effects on the resources, ecosystems, and human communities of concern." [page 12]

9. Chapter 3 of the Cumulative Effects Report illustrates how to describe the affected environment during a cumulative impacts analysis. For example, "the analyses and supporting data should be **extended in terms of geography, time, and the potential for resource or system interactions.**" [page 23, emphasis added] Numerous components of the affected environment are listed, with examples of various issues to be considered under each component. All of the components and issues listed in Chapter 3 of the Cumulative Effects Report are capable of resulting solely from the cumulative impacts triggered by the General permits authorized by the COE in Florida. Examples of components and issues particularly relevant to this case include the following [NOTE - the following "Surface Water" issues are equivalent to "Ground Water issues for Florida]:

"Surface Water

Water shortages from unmanaged or unmonitored allocations of the water supply that exceed the capacity of the resource.

Deterioration of recreational uses from nonpoint-source pollution, competing uses for the water body, and over-crowding." [page 25, emphasis added]

"Ground Water

Water quality degradation from nonpoint- and multiple-point sources of pollution that infiltrate aquifers.

Aquifer depletion or salt water intrusion following the overdraft or groundwater for numerous uncoordinated uses." [page 25, emphasis added]

"Wetlands

Habitat loss and diminished flood control capacity resulting from dredging and filling individual tracts of wetlands.

Toxic sediment contamination and reduced wetlands functioning resulting from irrigation and urban runoff." [page 25]

"Ecological Systems

Habitat fragmentation from the cumulative effects of multiple land clearing activities,