



September 12, 2013

Mr. Mike Spaits,  
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**RE: Proposed GRASI Landscape Initiative Training Activities in Blackwater River and Tate's Hell State Forests**

Dear Mr. Spaits:

Audubon Florida, the state's oldest and largest conservation organization, founded in 1900, provides the following comments on the U.S. Air Force proposal to utilize Blackwater River State Forest and Tate's Hell State Forest for military training exercises as described in the scoping documents.

Audubon Florida and its local chapters have invested considerable time, effort and funds in collaboration with the managers of both of these state forests to advance important ecological management efforts designed to improve habitat for important species, including but not limited to listed species such as the Red-cockaded Woodpecker.

Audubon is knowledgeable about, and very appreciative of United States Air Force efforts toward land and wildlife conservation, which have been evident on such tracts as Avon Park Bombing Range, Tyndall Air Force Base and Eglin Air Force Base in Florida.

We know that under proper circumstances, and with adequate planning and careful management, some types of military exercise uses may be compatible with land and wildlife conservation.

With that in mind, we have examined the uses at Blackwater River State Forest, and Tate's Hell State Forest proposed in the GRASI initiative. Our review has convinced us that elements of the current proposals of the U.S. Air Force for military exercises in these two state forest units are far reaching, expansive, and overly intrusive in the natural environment of both state forests.

We have the following comments specifically addressing the scoping of the EIS:

- (1) Alternatives should be developed in the EIS process to exclude significant sensitive portions of both Blackwater and Tate's Hell State Forests from the impact of most of the proposed activities, including operations involving vehicles, aircraft, and training munitions, noise-generating expendables and pyrotechnic devices. The exclusion areas should be based upon detailed, ground-truthed mapping of habitats for rare and listed species, and high quality natural communities. In general, operations and constructed facilities need to be excluded from such areas, with adequate buffer zones.
- (2) Monitoring and control of these operations, even if limited as indicated in the suggested alternatives below, should involve credentialed third-party observers with the power to intervene with commanders in the field to curtail or alter operations on a real-time basis to protect fragile resources.
- (3) Alternatives should also incorporate the following limitations on military training exercises:
  - (a) The operation of wheeled or tracked military vehicles in wetlands of any kind should be prohibited. Vehicle operations of all kinds should be limited to existing roads, and then be outside of designated exclusion areas as indicated in (1) above.
  - (b) The construction of airstrips or improvement of existing airstrips for fixed-wing aircraft use should not be permitted within either state forest. Aircraft operations should be limited to rotary aircraft.
  - (c) Rotary aircraft operations, Temporary Combat Support Areas, Bivouacking, Assembly Areas, Hardened Camp Sites, and Emplacement of Obstacles should be limited to existing cleared areas and previously disturbed sites.
  - (d) Installation of Emitter Sites should be limited to existing cleared, disturbed areas, where line-of-sight for emitter operation is available without clearing, topping, or trimming old growth pine forest habitat vital to Red-cockaded Woodpecker nesting and reproduction.
  - (e) Amphibious operations should be limited to small boat maneuvers (not heavy landing craft).
  - (f) Military training exercises should be limited in time and duration to avoid conflict with the traditional public access to these state forests and to avoid interference with the quality of experiences in these areas by members of the general public.

In conclusion, Audubon Florida considers Blackwater River State Forest and Tate's Hell State Forest to be among Florida's premier ecological assets. We believe that conducting military training exercises in these areas would require extraordinary care; detailed natural resource oriented planning and scrupulous monitoring.

It is important to note that significant portions of the lands affected by this proposal were acquired under environmental land acquisition programs such as Preservation 2000, or Florida Forever, using funds appropriated and/or produced by bond sales which have specific land conservation covenants attached. While *compatible* uses may be considered, we believe that the purpose and function of these tracts must remain primarily dedicated to the conservation purposes for which they were acquired.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles Lee', with a large, stylized initial 'C'.

Charles Lee  
Director of Advocacy