

APALACHICOLA RIVERKEEPER®

SAVING AN AMERICAN TREASURE

July 6, 2015

TO: Eglin AFB Public Affairs (96 TW/PA)
ATTN: Mr. Michael Spaits
101 W. D Ave., Room 238
Eglin AFB, FL 32542-5499

FROM: Dan Tonsmeire
Apalachicola Riverkeeper
232 b Water Street
Apalachicola, FL 32320

RE: Comments regarding GRASI Final Environmental Impact Statement

I. Introduction

I write on behalf of the Board of Directors and over 1400 members of *Apalachicola Riverkeeper*, a non-profit organization dedicated to stewardship of the Apalachicola River, Bay, floodplain, and estuary, of which Tateø Hell State Forest is a part. I have read the pertinent sections of the final Environmental Impact Statement (EIS) for the GRASI military training exercises in Tateø Hell State Forest. ÷

Apalachicola Riverkeeper fully supports the military of the United States. We understand that for their protection and ours, the men and women who risk their lives on our behalf must undergo training, and that training often requires specific types of terrain in order to be effective. We also understand that citizens who do not serve in the military must share the burden of the defense of our nation and of the freedoms that we all enjoy.

But we also know that there are appropriate places and times for those training activities to occur. Training activities as described in the final EIS are not appropriate for Tateø Hell State Forest. Contrary to the finding of the EIS that no significant adverse impacts will occur, we believe that important and significant adverse effects will occur. We believe that the No Action Alternative is the only acceptable choice among the alternative described in the EIS. We urge that the No Action Alternative be chosen, and that plans to conduct military training exercises in Tateø Hell State Forest be abandoned.

II. General comments

We are very pleased to see that the Air Force recognizes that the Proposed Action as originally described represents an unacceptable level of intrusion into the ecological, recreational, and cultural services provided to the people of

North Florida by Tate's Hell State Forest. We are pleased to see that many of the most noxious and/or unsafe activities – in particular, use of expendables, night driving, and amphibious operations – have been eliminated from Sub alternative 1, which the Air Force now designates as its *Preferred Alternative*.

However, the Executive Summary makes it explicitly clear that despite the currently-expressed preference for Sub alternative 1, the choice yet to be made by the Air Force can include any of activities, at any of the locations, that constitute the Proposed Action.

As expressed in our previous comments on the Draft EIS, we are unalterably opposed to that action. We reiterate and incorporate those comments here, and that letter is included with this submission for your convenience.

Further, despite the reduced degree of annoyance, disruption, and safety risk that Sub alternative 1 represents relative to the Proposed Action, we believe that these training exercises are fundamentally inconsistent with the purposes of, and services provided by, Tate's Hell State Forest. The reasons for the existence of the forest as a tax-exempt, state-owned, and state-operated entity are to preserve, restore, and enhance the ecological functions and services of the land and nearby receiving waters, and to preserve the recreational opportunities and services provided by the land to the people of North Florida, especially those in Liberty County and Franklin County. The adverse consequences of the Proposed Action, or of Sub alternative 1, will fall almost exclusively on the people of these two counties. We find this to be both significant and unacceptable.

We have a fundamental difference in perspective regarding that which represents or constitutes a significant impact. We understand that the Air Force adheres to the formal definition of significance, as codified in CFR, and described on page 2-47: an adverse effect is deemed insignificant if "short-to-medium impacts [occur] ***under any context or intensity***." (Italics ours). Elsewhere, medium-term is defined as extending up to a year from occurrence. We prefer to apply a layman's definition: insignificant means "too small or unimportant to be worth consideration." We believe that many impacts that last for a year are regarded by most forest users and neighbors as not insignificant, irrespective the definitions provided by CFR. There are many impacts that are so described. But, having been dismissed in the analysis as being minimized and insignificant, they will (therefore) not be mitigated. This degradation of the experience of both wildlife and people constitutes an unacceptable corruption of the mission of the forest.

In particular, our conclusions differ from those of the Air Force regarding items including but not limited to the following:

- A/LVL activity may occur 232 days per year, which is essentially every weekday except for holidays. We find this likely to have adverse impacts upon the experience of recreational users and the life-activities of wildlife, in ways that are not insignificant, especially when considered cumulatively.
- Likewise, OFVO are described as occurring "5 times/week" with no other limitation in terms of frequency or total occurrence. We find this likely to have adverse impacts upon the experience of recreational users

and the life-activities of wildlife, in ways that are not insignificant, especially when considered cumulatively.

- We understand and accept the idea that treetop-level aviation reduces the lateral spread of disruptive noise. However, it also increases the annoyance, discomfort, and disruption for those directly below, many of whom will be in places other than the Known Noise-Sensitive Sites. We find this likely to have adverse impacts upon the experience of recreational users and the life-activities of wildlife, in ways that are not insignificant.
- The possibility, likelihood, and adverse effects of aircraft mishaps (your term, not ours) is dismissed as essentially unimportant. It's worth noting that there have been two recent incidents not mentioned in the summary: F-16 in November of 2014, and H-60 in March of 2015. Concern with these possibilities is not insignificant for those who may find themselves in flight paths. The phrase "negligible impacts from aircraft mishaps" does not capture the importance of these very unfortunate possibilities.
- An important and highly-significant type of mishap would be a crash in an estuary or shellfish bed, in which substantial discharge of pollutants occurred. We did not find in the EIS any discussion of this possibility, its impact, and necessary mitigation.
- It is noted that impacts on wildlife will include "effects such as interruptions of nesting or breeding or abandonment of young." We disagree that such ecological disruption is not significant, especially when the impacts fall in a forest whose primary function is ecological.
- We agree that "decrease in the price for homes closer to noise-intense activities occurring in the forest" is difficult to estimate and/or quantify. Irrespective of the econometric difficulties, for those unlucky landowners who experience these effects, the losses may be quite significant.
- The EIS states that "[Training] Activities would not preclude recreational use or cause general incompatibility." The second clause does not follow from the first. We can agree with the rather absolute "does not preclude" statement, but we strongly disagree that the military presence on a daily basis throughout the year, multiple times each day, does not have inherent compatibility problems with the ecological and recreational purposes and uses of the state forest.
- The EIS states that the value of nature-based tourism in Tate's Hell State Forest has been estimated to be \$4 million annually. Any material reduction of that value would be significant in the economic context of these two counties, neither of which is currently thriving in terms of income, employment, or standard of living.

- What is truly insignificant is the likelihood of any significant economic benefit to these counties. The EIS presents some discussion of the positive economic impact of training exercises in local communities. If troops were to be housed, fed, and their vehicles fueled locally, some positive impact might occur in Liberty and Franklin counties. However, as the trainees will simply be flying over these counties to their destinations in Tateø Hell State Forest, no positive economic impact will occur locally.

In summary, we find many areas of substantial disagreement with the judgment of the Air Force that the impacts of either the Proposed Action, or Subalternative 1 (now designated as the *Preferred Alternative*), will not have significant negative impacts on the level and quality of ecological services and recreational services provided by Tateø Hell State Forest. We conclude that the extent, degree, and duration of these impacts are fundamentally inconsistent with the purpose of Tateø Hell State Forest, and we recommend that all plans for military training in that location should be abandoned.

III. Inadequate consideration of alternatives

As noted in our earlier comments, an EIS should consider a broad range of alternatives. The Final EIS is an improvement in that regard, but still lacking. We understand from the discussion in Section 3 that the outright acquisition of the acreage needed for the original Proposed Action was deemed economically infeasible, and in conflict with current DoD policy preferences. This decision, however, was likely made prior to the creation of Sub alternative 1, with its greatly reduced need for land area. Given that the Air Force finds it acceptable to enter into lease agreements with the State of Florida and its agencies, the Air Force should explore and the EIS should discuss the possibilities of leasing private land in North Florida to satisfy the greatly-reduced needs of Sub alternative 1.

IV. Specific comments, observations, and questions

These items are drawn from those sections most pertinent to the use of Tateø Hell State Forest, which is the primary area of concern for *Apalachicola Riverkeeper*: the Executive Summary, Section 2, Section 3, and Section 6.

A. Items from the Executive Summary:

1. With the exception of the heading on subsection ES.4.2, the fact that Sub alternative 1 is now the *Preferred Alternative* is omitted from the Executive Summary. As the ES is all that many people will read, this is unnecessarily confusing, and easily remedied.
2. It is made clear in the ES that despite the expressed preference for Sub alternative 1, the ultimate decision regarding the set of activities and locations has not yet been made. Accordingly, as this leaves the original Proposed Action on the table, we reiterate our objections to that action, as

expressed in our comment letter of June, 2014. That letter is included with this submission.

3. A/LVL activity may occur 232 days per year, which is essentially every weekday except for holidays. We believe that the adverse affects of this degree of activity is not insignificant.
4. Similarly, OFVO are described as occurring 5 times/week with no other limitation. We believe that the adverse affects of this degree of activity is not insignificant.
5. It is not at all clear how the simulated urban environment that is needed would be created at Tate's Hell, or what that would consist of, or what the impact of that would be.
6. We disagree with the idea that "There are no unknown risks".

B. Items from Section 2

1. In our view, the EIS still does not include the broad range of alternative specified by federal law. The EIS should include consideration of a purchase or lease option on non-public land necessary to accommodate the greatly-reduced scope and intensity of Sub alternative 1.
2. Many references are made to future Mitigation Plans for various adverse impacts. As those plans are not part of the current EIS, these should be subject to an EIS (or equivalent) process of public communication and review. The lack of future public participation in these important plans is not insignificant.
3. It is not clear that there will be any public involvement in monitoring compliance with the constraints, restrictions, and the future mitigation plans. We believe that such public participation is both important and necessary.
4. We understand and accept the idea that treetop-level aviation reduces the lateral spread of disruptive noise. It also increases the annoyance, discomfort, and disruption for those directly below. This is not insignificant.
5. It is commendable that substantial attention is given to avoiding recognized noise-sensitive sites. But as users (and wildlife) can be anywhere, there will be noise-sensitive residents and visitors everywhere in the forest, who will experience comfort, and disruption. This is not insignificant.

6. Not enough attention is given to worst-case scenarios, including but not limited to an aircraft mishap involving the spilling of chemical pollutants into the forest, or the estuary, or the nearby rivers, or nearby shellfish beds. The adverse ecological and economic effects could be highly-significant.
7. The buffer of 200ø around RCW trees seems sufficient for foot activity, but insufficient for ground vehicles or aircraft.
8. We disagree that grass is impervious.
9. In reading through all of the important constraints and restrictions, we can't help but wonder how these will be effectively monitored and enforced. To choose just one example, how will it be assured that watercraft will "Avoid contact of boat propellers with submerged vegetation," and what sort of consequences and mitigation will follow upon violation of this constraint?

C. From Section 3

1. Noise measurement: SEL is defined, but seems to play only a minor role in the analysis (subordinate to L_{eq} and DNL). It appears to us to be an important measure, especially for noise at night.
2. The predominant if not exclusive measure of sound in the analysis is dBA. However, for the long-duration & low-frequency noise of helicopters when hovering, or generators running for extended periods, dBC should be used, as well. Nearby wildlife as well as humans will feel these vibrations as well as hear them, which makes dBC the appropriate measure.
3. The possibility and likelihood of aircraft crashes is dismissed as essentially unimportant. It's worth noting that there have been two recent local incidents not mentioned in the summary: an F-16 went down in November of 2014, and an H-60 in March of 2015. Concern with these possibilities is not insignificant for those who may find themselves in flight paths. Adverse effects on tourism could be significant as well, depending upon the details of the incident. The phrase "negligible impacts from aircraft mishaps" does not capture the importance of these very unfortunate possibilities.

4. Impacts on wildlife will include effects such as interruptions of nesting or breeding or abandonment of young. We disagree that such ecological disruption is not significant, when the impacts fall in a forest whose primary function is ecological.
5. Are these disruptions to wildlife occasional and unimportant (as most of the document seems to suggest) or are they so frequent that we hope that we all just get used to it? P. 3-76: "Animal species would likely habituate to aircraft presence over time, given the ongoing tempo of day-to-day training."
6. We agree that "decrease in the price for homes closer to noise-intense activities occurring in the forest" is difficult to estimate and/or quantify, but for those who experience it, it is not insignificant.

D. Section 6

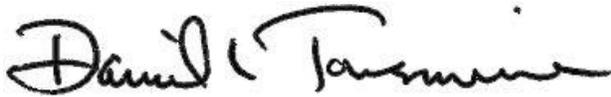
1. We have no expertise on airspace issues, and defer to the judgment of airport personnel in Carrabelle who have expressed substantial misgiving. To our knowledge, those objections have not yet been withdrawn.
2. It is true that we experience the noise of military jets on a daily basis, without great objection. However: (a) that noise, however frequent, is fleeting; (b) for many local residents, that noise was already here when we made our choices to live here, and others were born into it, which makes it far less objectionable. The noise of the THSF training exercises would be new, and in addition to what has previously been judged acceptable; the degree of discomfort and annoyance is thus greater. A relevant comparison would be to the training exercises that occur at Apalachicola airport involving various craft (including CV-22). These exercises are fairly recent additions that occur for extended periods, and which many find objectionable. Those objections are not insignificant.
3. Rotation of approach flight-path route is both good & bad. Yes, it keeps the significant annoyance, discomfort, and disruption from being concentrated among a small number of beings. But, as a practical matter, it makes it all but impossible to plan in ways that allow avoidance of the noise, as one never knows whence it comes.

4. It is noted that much of the annoying vehicle noise will occur at night. For some forest users this will increase its significance, rather than diminish it.
5. We believe that potential impacts to soil & land are understated. As noted, 98% of the land area is hydric, so it will be wet & soft much of the time.
6. It is noted that 90 species of migratory birds use the forest, but also that migratory means transnational. Many other intra-national migrants use the forest as well, and many breed there. And there are many permanent avian residents, as well. Impacts to birds, including many species that are suffering serious declines without yet being officially Threatened or Endangered, are likely to be far more significant than suggested in the EIS.
7. Data reflecting the economic importance of tourism numbers are likely underestimates of its importance, given that most new construction is in some way related to tourism.
8. The value of nature-based tourism in Tates Hell State Forest has been estimated to be \$4 million annually, and for the Apalachicola River and Bay region, \$485 million annually. We have much to lose from the disruptions that the training exercises (and mishaps) would cause. We certainly do not need another ecological disaster to impact an economy that has not yet recovered from the last one.
9. It is true that training will have positive economic impact in some location, but the location is not in Franklin County. Benefits are elsewhere, but the ecological and economic costs are here.
10. The EIS maintains that "Activities would not preclude recreational use or cause general incompatibility. The second clause in no way follows from the first. We can agree with the rather absolute "does not preclude" statement, but we strongly disagree that the military presence on a daily basis throughout the year, multiple times each day, does not have inherent compatibility problems with the purpose and use of the state forest.

V. Conclusion

Apalachicola Riverkeeper has many objections to the analysis in the EIS, and the conclusions based thereupon. We believe that there will be many adverse impacts to the ecological functions and services created by Tateø Hell State Forest, and to the recreational services as well. We believe that military training in this particular forest is fundamentally incompatible with the purposes for which it was created. We believe that the No Action Alternative is the only acceptable alternative of those described in the EIS, and we urge that plans to conduct military training in Tateø Hell State Forest be abandoned.

Sincerely,



Dan Tonsmeire, Riverkeeper
Apalachicola Riverkeeper, Inc.

