

September 1, 2022

Camp Grayling Military Leased Lands Expansion Proposal Michigan Trout Unlimited Comment and Position



Position

Given the lack of specific and definitive written information regarding the scope and impact of this expansion proposal, and the lack of detailed justification of the necessity for it, it is the position of Michigan Trout Unlimited to oppose the proposed expansion of the Camp Grayling Joint Maneuver Training Center as presented at this time.

Background

The Camp Grayling Joint Maneuver Training Center at Grayling, MI is the largest National Guard training facility in the United States. It comprises 148,000 acres of four-seasons training lands, 337 square-km of restricted airspace, and up to 6000 Hz spectrum available.

Camp Grayling supports the summer and winter Northern Strike joint exercises, and National Guard Exportable Combat Training Center Exercises. Camp Grayling provides premier facilities including a Combined Arms Collective Training Facility, two impact areas for indirect fire and aerial weapon systems up to 500-pounds, and three live-fire shoot houses.

Specialized facilities include the Maneuver Area Training Equipment Site for pooled equipment, Multipurpose Range Complex capable of armor/crew served weapons and Combined Live Fire Exercise, and an Army Airfield with two 5,000-foot runways.

In 2022 Michigan Trout Unlimited became aware of the proposal from Camp Grayling leadership to greatly expand the acreage of the lands it leases from the State of Michigan; doubling the total footprint by adding an additional 160,000 acres to its existing 148,000 acres of space.

Michigan Trout Unlimited Concerns

This proposal was communicated in haphazard and often chaotic or contradicting manners. The lands in question included enormous tracts of the Manistee River, portions of the Au Sable River, and included prolific amounts of the tributary streams feeding these watersheds. Throughout the rollout of this proposal, very little detail of the specifics of locations and restrictions on the use of the lands have been provided in writing. Most presentations of the proposal have been done via in person public meetings or in person small group meetings.

Our justification for opposing the expansion plans as presented include:

- Lack of definitive and clear expression of the need for these additional lands.
 - The stated purposes we have heard, are to allow for electronic warfare training, and the general notion that it requires separation between training units. However, no detailed information has been received to justify the nature of how much spacing, how many troops, and troops per unit are needed and how scheduling and availability of current leased lands is inadequate to meet the demand currently – on this base or at other national military installations.
 - In fact, in an article by Calli Newberry in DBusiness (5-6-2022) entitled “Camp Innovation”, two Camp Grayling leaders were quoted in speaking about this issue of NEED, WANT or limitations of land, and cast doubt towards the NEED for these new lands. Col. Scott Myers stated *“Ever since we unveiled NADWC, my phone has been*

ringing off the hook with private industry trying to get into this place. And the advantage is that we have a lot of availability and a lot of land for folks to come out here and play.” Brig. Gen. Bryan Teff stated, “Those two words are very key: “own” and “operate”. We schedule, we manage, (and) we own the largest overland air space complex east of the Mississippi River. When you combine all of those things together on the airspace side, and (see) how it integrates with the ground maneuver space , we have tremendous capability here in Michigan.”

- Lack of detailed scope by which to determine potential impacts on the land and water
 - In most permitting and review processes there are clearly defined Areas of Potential Effect (APEs) which include both an APE for Direct Effects and an APE for Indirect Effects resulting from the permitted activity.
 - At this point, without clearly defined APEs included within any lands proposed for a lease arrangement there is no realistic manner by which to clearly understand the full range of activities which would be permitted to occur, and also no meaningful manner by which to effectively assess potential for harms to the environment, fish & wildlife, or private property without a clear definition of either the Direct or Indirect APE.
- Need for complete Environmental Impact Statement
 - As in most forms of permitting, when considering the impacts to one group of parties from the possible permission being contemplated to be granted to another party, necessity and prudent & feasible alternatives assessment is required. In the case of this proposal, there is a need for a complete Environmental Impact Statement (EIS) to be completed. While such assessments may be contemplated for later in this “process”, they are absent currently, and thus we are commenting on this proposal now in the absence of critically important information.

Conclusion

Given the enormity of the lands proposed, and the myriad pathways for this proposal to impact natural resources, coldwater fish, recreational angling, and these watersheds, Michigan Trout Unlimited has a significant number of potential concerns or objections.

Through the in-person meetings we have attended, the DNR and Camp Grayling staff have verbally addressed some of our concerns in ways that, if executed, would help to allay our opposition. However, none these important details have been presented in writing in any form and thus we currently do not have assurances they will be addressed satisfactorily.

Therefore, given the lack of specific and definitive written information regarding the scope and impact of this expansion proposal, and the lack of detailed justification of the need for the expansion, it is the position of Michigan Trout Unlimited to oppose the proposed expansion of the Camp Grayling Joint Maneuver Training Center as presented at this time.