



ANGLERS OF THE AU SABLE

An affiliated member of the Federation of Fly Fishers

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August 29, 2022

VIA EMAIL AND FIRST CLASS MAIL

Director Dan Eichinger
Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909
dnr-director@michigan.gov

In Re: National Guard Proposed Expansion

Dear Director Eichinger,

Anglers of the Au Sable (Anglers), with 1,200 members spread throughout Michigan and the Midwest, and a 35-year history of defending the Au Sable and Manistee Rivers, strongly opposes the National Guard's proposal to more than double the size of the current training facility located near Grayling. This proposal would add to the current size of 231 square miles an additional 253 square miles of land; state-owned land held in trust for the people and that is managed by the Department of Natural Resources (DNR) for the benefit of the citizens of Michigan. This proposal seeks to incorporate into an already enormous military training complex the fragile watersheds of the Manistee and Au Sable Rivers, two of the most iconic and special rivers found east of the Mississippi River.

The DNR, in agreeing to such an expansion, would be exceeding its authority, and violating its statutory mission and duty when it comes to protecting the natural resources of Michigan. This statutory duty is set forth in MCL 324.503. The statute in section (1) states, "The department (DNR) shall protect and conserve the natural resources of this state..." There is no exception for transferring control of natural resources to the military. For this reason alone, the proposal must be rejected.

In addition, Anglers opposes the electromagnetic training and testing that is the National Guard's stated use and is anticipated in this proposed expansion. Electromagnetic training involves potential serious risks, both known and unknown. Moreover, it is wrong to allow this expansion without a better understanding of electromagnetic training and testing, its risks and whether it genuinely requires such an enormous addition to the Camp. A twenty-year lease creates a slippery slope of such activities, and once this type of testing and training is allowed on this land, its regulation will be difficult to control and is potentially dangerous.

Access to water, the joy of experiencing these special watersheds in quiet and solitude, the protection of the wetlands, small creeks, and streams, which feed these wonderful rivers, all are at risk with this unnecessary proposed expansion.

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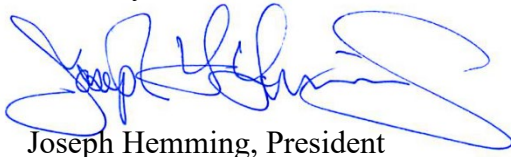
Anglers very much understands and appreciates the mission of the National Guard and the importance of proper training to carry out that mission. However, the current 231-mile complex of Camp Grayling allows for that to occur. In fact, in DBusiness Magazine in an article dated July 13, 2022, Brig. Gen. Bryan J. Teff, Assistant Adjutant General, Michigan Air National Guard, in speaking of the combined space of Camp Grayling, restricted airspace at Alpena, the facilities at Selfridge and Battle Creek, states, “ We (referring to the National Guard) schedule, we manage, (and) we own the largest overland air space complex east of the Mississippi River,” adding that “...we have tremendous capability in Michigan.” The National Guard clearly has sufficient land for carrying out its mission.

This proposed expansion is a direct threat to various conservation priority areas that Anglers identified in a conservation priority mapping of these areas. In our review of the areas requested by the National Guard in this proposed expansion, 22% of land requested is either of critical, or of a high, conservation priority. In addition, more than 134 miles of rivers and streams are included in the proposed expansion as well as over 71,000 acres of wetlands habitat. This is unacceptable and unnecessary.

Last year, the DNR, under your direction and leadership, brought together various stakeholders, including Anglers, to commence a two-year resilience project for the Au Sable River, looking at protecting this river from various threats in the years to come. This proposed military expansion is one of those threats.

In closing, these special rivers demand the highest level of protection. Anglers emphatically opposes this proposed expansion.

Sincerely,



Joseph Hemming, President

xc: Governor Gretchen Whitmer
Senator Edward McBroom
Representative Gary Howell
Senator Curt VanderWall
Representative Daire Rendon