

The Proposed Camp Grayling Expansion It's a Bad Idea

The Proposed Expansion

Camp Grayling in Northern Michigan is the largest National Guard training center (148,000 acres) in America. Which at 231.25 square miles is the size of Chicago or 112,121 football fields. It spans Crawford, Kalkaska, and Otsego Counties.

The National Guard is requesting an additional 162,000 acres of public land bringing the size of Camp Grayling to over 484 square miles or 234,848 football fields or 1.2% of the lower peninsula. Camp Grayling's Commander, Col. Scott Meyers, and Department of Natural Resources' spokesperson, Tom Barnes, have been engaged to convince residents that Camp Grayling is suddenly undersized for the electromagnetic warfare training that it has been engaged in for years. Col. Meyers has acknowledged the request size was a number arrived at arbitrarily. Before and after expansion maps can be viewed at [230isenough](http://230isenough.com) (230, 2022).

The Need

Col. Meyers has yet to justify the need for the extra acreage. One of the suggested plans is for its use in Electronic Warfare Training., which is already being done on the current acreage and being done at other National Guard Training centers that are much smaller in size. Col. Meyers has stated that large portions of the current Camp acreage are not used by the military. In addition, he portrays that the land requested for expansion is "vacant." That is patently false and here is why. All of the land under question is used by hunters, trappers, fishermen, ATVers, snowmobilers, Nordic skiers, hikers, snowshoers, rockhounds, plant/fungi collectors, photographers, stargazers, backpackers, equestrians, canoers/kayakers and those that seek a quiet respite. These uses may be seasonal or periodic, but they in no way suggest that this area is vacant or abandoned. Even when not present in this area, people traffic in this landscape and waterscape with their minds. This is what personifies Pure Michigan, not a military operation. It is important to note here that users of this area see themselves as stewards of the plant and animal resources. And, defining an area as abandoned and vacant is exactly how colonizers have, historically, justified expansion. Thus, this request for an expansion is in reality a "want" and not a "need."

The question is why does Camp Grayling need to double its size if Electronic Warfare Training can be done on the current land? The answer appears to be that the proposed public land expansion area would be subleased to private industry as a testing area for electromagnetic warfare or anything else the military might be interested in (DBusiness Magazine May-June

2022 edition). This subleasing effort is being led by Adj. Gen. Paul Rogers, Governor Whitmer's appointee. The plan is to turn the public land surrounding Grayling, MI, and the restricted airspace above it into a massive, nationally recognized area to test and develop new products, weapons, and technologies. In fact, in October 2022, Camp Grayling had an industry symposium with over 80 businesses and people attending, many dealing with cyber/software companies/electromagnetic warfare. Proponents argue that there will be economic benefits from the expansion and subsequent subleasing. However, it is not clear what these benefits will be. A more likely and supportable outcome is that these activities will have negative economic impacts (e.g., decreased tourism and decreased property values).

Concern 1: Lack of Trust and Transparency

In the early 1900's, Rasmus Hanson granted land for the establishment of Camp Grayling to train Michigan's National Guard. However, Camp Grayling no longer trains just the Michigan National Guard, now Guard and Reserve units from states across the U.S. and globally, which was not the original intent. This change in the role of Camp Grayling by the Military is an example leading to distrust of the word of the Military as well as the Department of Natural Resources (MDNR). In fact, the scope of activities at Camp Grayling will be significantly increased according to the State of Michigan's Strategic Plan for the State for Fiscal Years 2023-2027. Camp Grayling will play a major role in the Michigan National All Domain Warfighting Center (NADWC), which is under the command of Col Meyers, and in part will engage and host strategic, operational, and tactical testing and demonstration of new equipment, capabilities, and doctrine and the Kelly Johnson All Domain Innovation Center (KJADIC) that will market and engage DoD, industry, and academia to synchronize and maximize joint innovative initiatives. The Kelly Johnson Joint All-Domain Innovation Center was established to create a partnership between the Michigan National Guard, industry, DoD research agencies, and academia. Northern Strike will be expanded and include the addition of the Taiwan Armed Forces. Undoubtedly, the well-being of homeowners will most likely be profoundly impacted.

There have been road closures by the military. For example, County Road 612 was recently closed for military firing. County Road 612 is the main road from Grayling to Lovells and Lewiston. Such closures are not appropriate. When asked about future closures in the expansion areas at a public forum Col. Meyers said there would be no closures. Then in the same meeting he said yes there would be closures during training. Then in the next public forum he said no there will not be. Which is correct? This is another example leading to the distrust by citizens of the words of the Military.

New artillery firing points are another issue of distrust. In the original proposed map, at least 5 new artillery firing points were included, one was very close to Lovells. These were for High Mobility Artillery Rocket Systems (HIMARS). The justification was that because these systems can fire longer ranges, more space was needed. At the Grayling meeting, comments on these

firing points were asked of Col. Meyers. The answer was unclear. There were some statements that these were a mistake. At the next meeting that occurred only two weeks later, the firing points were removed because it was stated that the technology of the artillery systems had advanced. Col. Meyers said that the technology has longer range guns and needs firing stations at 70-90 km rather than Lovells for example which would be 35km out. Which is the correct interpretation? Many of the public believe that they were removed to get the expansion passed and then they will reappear, i.e., they are not permanently gone. This concern is supported by information in the State of Michigan; Strategic Plan for the State for Fiscal Years 2023-2027, which states that by 2024, Camp Grayling becomes a preferred training location for armor and field artillery.

Concern 2: Impacts to the Welfare of the Watersheds.

The proposed expansion will occupy significant portions of the headwaters of the AuSable, Manistee, and Muskegon Rivers systems which are the cradles of these Pure Michigan resources. These watershed systems are considered fragile, and it is this fragility that makes these wonderful cultural, recreational, and economic resources for Michigan citizens and beyond. As such they are world class fisheries. In fact, in a promotional Pure Michigan commercial, there is a fly fisherman on a river that looks to be the Au Sable.

The fragility of the systems is powerfully demonstrated by the sudden collapse of the trout population in the Au Sable North Branch. The physical, chemical, or biological reasons for the collapse are unclear, but one hypothesis considers the collapse to be related to an intense storm that occurred in a time frame not typical for such storms (Long, 2022). Climate change may be the underpinning for this and needs to be considered in maintaining the health of the watersheds.

In terms of pollution, the Military activities have already impacted the watershed. The occurrence of perfluorooctanesulfonic acid (PFOS) in rivers, groundwater and lakes is just one example. In many cases these resources are currently unusable. In a 2018 study, the U.S. Geological Survey measured a variety of organic chemicals in the North Branch of the Au Sable to better understand the potential role of pollution on the decline in fish (Brennan and Alvarez, 2020). Twenty-eight chemicals were identified in the river (Long, 2022). Concentrations, not considering synergist effects, were not at threshold levels. But that could be due to the timing of sampling which occurred on the falling limb of the hydrograph after a major storm that caused dilution. Sources for these chemicals are consistent with being from golf courses, homeowners, combustion, automobiles, military, and global sources, however, the importance of a particular source is not clear (Long, 2022).

In addition to the measurements for pollution, there are also concerns about measurements not being made. Thus, full knowledge of the pollution impact of military activities on the river systems is not known. For example, there is a question often posed about possible pollution of

groundwater at the impact sites and the potential for a contaminant plume and its future impact on the system. Negative impacts (pollution, habitat disruption and other landscape disturbance) can happen from activities anywhere in the watershed. To show the public that the military wants to be a good steward of the rivers, they have proposed no activities within 1,500 feet of a river. However, this distance has no scientific justification and is an arbitrary number. The lack of measurements and understanding means the total impact on the environment and environmental legacy by military activities at Camp Grayling is unknown.

The above demonstrates the need to better understand the watershed systems (i.e., the physical, chemical, and biological processes and their interactions) and threats (e.g., some noted in the letter) to the system. It is the watershed system that protects the ribbons of water running through it. The proposed expanded activity can be seen as a threat to the system. Once natural systems are disturbed, they may be disturbed for a long time and most likely will not return to pre-disturbance states (Long, et al., 2010).

For residents and other users of the targeted area, many trails and lake access are already closed during training, some permanently. The level of activities by Camp Grayling have increased to an intensity that when training is in session, homeowners hear the firing of artillery, low flying jets, explosions and machine gun fire. The explosions rattle houses causing objects for all off shelves and drywall nails to pop out.

In sum, negative impacts to the welfare of the watersheds as a result of the expansion will include environmental (e.g., pollution, landscape disturbance), ecosystem (e.g., fisheries), recreational (e.g., no fish, trail closures), enjoyment (e.g., noise, visual pollution, all the preceding), and economic (e.g., decrease in recreation tourism and effects on restaurants, recreational business, decreased property values, infrastructure degradation) (e.g., DUBY, 2022).

Concern 3: Viewpoint of Col. Meyers

Because Col. Meyers has been unsuccessful in convincing residents of the need for additional public land, he questions the patriotism and support of the communities, and by extension the entire state, for not rolling over and giving the additional public land to Camp Grayling. If sacrificing public land to the National Guard is the bar measuring patriotism, then Meyers must be reminded that no other state has sacrificed more of its public land in support of the National Guard than Michigan. No county has sacrificed as much public land as Crawford County, home to the Au Sable and Manistee River systems. The communities, county, state have demonstrated patriotism and support to Camp Grayling for over 100 years.

Col Meyers worked directly with Mr. Steve Jacobs to develop a business in which non-governmental agencies and non-federal entities can access the facilities, training areas, and ranges located at Camp Grayling. The business is Velocity Management Solutions, LLC (VMS), which positions itself as the established entry point into the NADWV, Camp Grayling Michigan. Concerns have been raised to the Michigan Department of Technology, Management, and Budget (MDTMB) and the Michigan Attorney General (MAJ) that 1) MIARNG, and the Department of Military and Veteran Affairs are circumventing the Michigan State Purchasing Program (State of Michigan 1984) in order to avoid the State's competitive solicitation requirement; 2) VMS maybe in violation of Army Regulation 210-22 (DoA, 2022); Col Meyers and VMS maybe in violation of provisions contained in AR 405-80 Management of Title and Granting Use of Real Property (DoA, 1997). In addition, it was suggested to the MDTMB and MAJ, that because of these concerns there is a need for a review of ethical practices under DoD Directive 550.07-R Joint Ethics Regulations (DoD, 1993).

The Position of the Au Sable River Property Owners Association:

Public land in Michigan belongs to its citizens, not to the DNR to give away to the National Guard and certainly not to the National Guard to sublease to private industry for testing and weapons development. Military operations of any kind that will in any way detract from citizen's enjoyment of our public land must not be allowed on additional public land. And consider that the proposed expansion is a threat to the Au Sable, Manistee River, Muskegon ecosystems, which are world class destinations for fishing and four-season recreation opportunities and to the well-being of its homeowners in terms of their enjoyment and protection of this area of Pure Michigan. The MDNR must be reminded that its mission is the conservation, protection, and management of our state's natural resources for current and future generations. Allowing this expansion would be a complete departure from that mission.

Resources

230 (2022) 230 is Enough, Stop the Camp Grayling Expansion. <https://www.230isenough.com/>.

Brennan, A.K., and Alvarez, D.A. (2020) Evaluation of Legacy and Emerging Organic Chemicals using Passive Sampling Devices on the North Branch Au Sable River near Lovells, Michigan, June 2018. U.S. Geological Survey Scientific Investigations Report 2020-5002.

DoA (1997) Management of Title and Granting Use of Real Property. U.S. AR 405-80.

https://armypubs.army.mil/epubs/DR_pubs/DR_a/pdf/web/r405_80.pdf. DoA (2022) Support for Non-Federal Entities Authorized to Operate on Department of Army Installations. U.S. Army Regulation 210-22. 17 p.

https://armypubs.army.mil/epubs/DR_pubs/DR_a/ARN30701-AR_210-22-000-WEB-1.pdf.

DoD (1993) Joint Ethics Regulation. DoD 5500.7-R. 102 p.

<https://dodsoco.ogc.osd.mil/Portals/102/550007r.pdf>.

Duby, M. (2022) Camp Grayling Expansion - Please help spread awareness.

<https://www.youtube.com/watch?v=DH9JSuZmuq8>.

Facebook (2022) Camp Grayling expansion.

<https://www.facebook.com/search/top?q=camp%20grayling%20expansion>

Long et al. (2010) <https://www.dropbox.com/s/muwssubghz29i3r/Logging.pdf?dl=0>.

Long, D.T. (2022) The 2018 Organic Chemical Sampling on the North Branch of the Au Sable River: A Perspective. The 2022 Au Sable River Data Summit, Kirtland Community College, June, 25, 2022)

State of Michigan (1984) The Management and Budget Act 431 of 1984.

[http://www.legislature.mi.gov/\(S\(u4wfsuwybl4ugyojmrylkq4k\)\)/mileg.aspx?page=GetObject&objectname=mcl-Act-431-of-1984](http://www.legislature.mi.gov/(S(u4wfsuwybl4ugyojmrylkq4k))/mileg.aspx?page=GetObject&objectname=mcl-Act-431-of-1984).

State of Michigan (2022) State of Michigan; Strategic Plan for the State for Fiscal Years 2023-2027.

https://www.michigan.gov/budget/-/media/Project/Websites/budget/Fiscal/Executive-Budget/Current-Exec-Rec/Current-Supporting/FY23-Strategic-Plan.pdf?rev=fb9e6b34ca424c70bbc1158f87b8b0ae&hash=C399159EC54E265E2EB6C0CAB7048A38&fbclid=IwAR3EpM70E-fnn9qT77m0pbd5uG1dDA1LrEZj-7W9WQbsPXEW_PT-J5mv1Tw