



Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage
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August 25, 2022

Director Dan Eichinger
Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909
Via Electronic Mail

Dear Director Eichinger,

On behalf of Michigan United Conservation Clubs (MUCC), our 40,000 members and 200 affiliated clubs, we offer the following comments on the National Guard's proposed 162,000 acre expansion of Camp Grayling.

MUCC relies on a grassroots policy process to set the organization's directives. Our members dictate the positions of the organization. In 1989, MUCC members passed a resolution opposing the expansion of Camp Grayling except during a national emergency, as declared by the President or Congress.

To date, there has been no such declaration by either. Beyond that, MUCC believes the National Guard has failed to properly justify the need for an expansion of this size. The DNR has a statutory obligation (Public Act 47 of 2009) to keep hunting lands open to hunting. An exception can be made for homeland security, but the expansion proposal has not demonstrated that need. The DNR has a duty to ensure that it does not approve proposals that could limit access and opportunity for Michiganders without good cause and a plan for mitigation of the impacts.

The militarization of our public land is not something to be taken lightly, and Michigan residents should not have to shoulder the burden for the country's national security unless a valid and pertinent reason is proven to exist. To date, that reason has not been enunciated.

Furthermore, we feel as though the financial burden of the department review should not be borne by hunters, anglers and trappers who predominantly fund wildlife, fisheries and habitat activities. Our DNR has world-class staff across each division and they are already stretched

thin with regard to resources. This review would cause staff, spanning from the supervisor to the technician level, to reduce the time they spend on their normal, daily tasks to perform this review. These wasted DNR staff resources would not be for the betterment of the residents of Michigan nor wanted by the conservation community, but simply benefit the military.

MUCC firmly believes that consideration of this proposal and the possible expansion does not fall within the department's mission statement.

Nothing provided to the public by the DNR throughout this process has proven commitment to that mission, which commits *"to the conservation, protection, management, use and enjoyment of the state's natural and cultural resources for current and future generations."*

MUCC's core values underpin our opposition to this expansion. For more than 85 years, we have proven to be the state's No. 1 public land and access advocate. This land-grab is a risk we feel is unacceptable for the waters, wildlife and access Michiganders cherish.

While the National Guard has agreed to ensure no closures take place during the firearm deer season (Nov. 15-30), the department's FAQ is ambiguous and does not address concerns of closures affecting lack of access that other hunters, anglers, trappers and non-consumptive users may face. The guard has stated repeatedly it will not close public land; why then is there a need to specifically call out firearm deer season if no land will be closed? There is some kind of year-round opportunity on public lands for fishing, small game, upland birds, dog training, bear hunting and significant trail use that is not being considered.

As noted above: the DNR has a statutory obligation to ensure no net loss of hunting lands in Michigan. Public Act 47 of 2009 stipulates:

"2(a) Keep land under its control open to hunting unless the department determines that the land should be closed to hunting because of public safety, fish or wildlife management, or homeland security concerns or as otherwise required by law. 2(b) Manage land under its control to support and promote hunting and fishing opportunities to the extent authorized by law."

This expansion would be a clear violation of this statute.

In addition, there has not yet been a review of purchased lands in the proposed lease expansion, so we do not yet know the scope of this impact on restricted state and federal funds. The statutory assent language allowing the State of Michigan to receive federal wildlife funds (324.40501) states "license fees paid by hunters shall not be used for any purpose other than game and fish activities under the administration of the department". Leasing lands purchased through Fish and Game Fund or Pittman Robertson Wildlife Restoration Act funds would violate this assent language and risk current and future federal funding for diversion. Similarly, using staff paid by these funds to review the proposal, which will not benefit and may actually harm

fish, wildlife and the natural resources assets of the State of Michigan, would similarly violate this assent language and the constitutional protection of these restricted funds.

Lastly, the National Guard has granted a 1500-foot buffer zone from any body of water, but the risk to the public lands Michiganders cherish is still too high. The additional impact on the land and wildlife represent an unnecessary burden to the department and constituents who utilize, manage and protect it.

The buffer zone also fails to protect important wetlands within the proposed expansion area. Wetlands, as proven through the recent Michigan dam failures on the Tittabasse River, have proven invaluable to mitigating environmental contaminants. Without wetlands filtering our watersheds, the impact of pollution would be higher.

If the department chooses to move forward with an in depth review of the proposed parcels of land sought by the National Guard and against MUCC's wishes and those of the many members of the public and conservation community, then it is not unreasonable to demand compensation for this review either through an inter-department transfer or new appropriation for this purpose. Any such review of parcels should be made available to the public.

MUCC has learned through this process of "handshake" deals regarding uses and areas between the unit manager and the base's leadership. Regardless of the outcome of the review, a new Camp Grayling lease agreement should be drafted with extremely specific and enforceable provisions to best protect, mitigate and restore all impacts from military activities to codify and improve practices going forward.

For the reasons stated above, MUCC asks that you decline to perform the review and reject the proposal until a time that the expansion is further justified by the National Guard and the concerns regarding public access and environmental safety be addressed.

Sincerely,

A handwritten signature in cursive script that reads "Amy Trotter".

Amy Trotter, Executive Director

cc:

Deputy Director Shannon Lott
Unit Manager Thomas Barnes
Col. Scott L. Meyers