



January 3, 2023

**Public Comment Extended To January 14
Draft Environmental Assessment
Michigan Air National Guard Alpena Special Use
Airspace Complex
Including Huron, Tuscola, and Sanilac Counties**

By Bill Collins, Executive Director
Thumb Land Conservancy

This is a bit late notice, but the public comment period for the proposed expansion of the Michigan Air National Guard military combat training space across the northern lower peninsula and the Thumb has been extended through January 14.

For details and various document links regarding the proposal, and suggestions in making public comment, see the public notice page at this link: <https://www.alpenacrtc.ang.af.mil/Resources/Air-Space-Proposal/>

If you haven't already, you will be making public comment on the Draft Environmental Assessment For Modification and Addition of Airspace at the Alpena Special Use Airspace Complex available at this link, located at the upper right of the public notice page:

https://www.alpenacrtc.ang.af.mil/Portals/12/documents/AirSpace%20Documents/Draft%20EA_Alpena%20SUA%20Complex_MainBody_November%202022.pdf?ver=Ey56o_w9iSiyQBSEw-O16w%3d%3d

Links to other applicable documents, such as the Draft Environmental Assessment Appendices and Draft Finding of No Significant Impact, are also located at the upper right of the public notice page

For guidance on your comments, see the summary below provided by TLC member Clifford Stuehmer. In addition to this summary, Cliff has stressed that even at the 5999-foot flight ceiling, every overflight by F-16 jets will violate local ordinances that limit noise to 85 dBA, and that Day-Night Average Sound Levels (DNL), a measurement which spreads sound impact over a 24-hour period, is inadequate, if not deceptive, in considering the impact of high-level short-duration noise.

It is also very important that an environmental assessment for a proposed air space use of this scale more fully account for the cumulative impact of so many activities happening now and proposed for our region. The population of the Thumb is already exposed to a lot of noise, pollution, and other impacts from increasingly industrialized large-scale farming, trash burning, and wind turbine complexes, among other activities, with more big projects coming our way.

Comments can be emailed to:

NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil with the subject line "ATTN: Alpena SUA EA" by midnight of January 14.



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Original Notice

Public Comment Due By This Wednesday, December 14

**Draft Environmental Assessment
Michigan Air National Guard Alpena Special Use
Airspace Complex
Including Huron, Tuscola, and Sanilac Counties**

By Bill Collins, Executive Director
Thumb land Conservancy

A huge expansion of the Michigan Air National Guard military combat training space across the northern lower peninsula and Thumb was suddenly proposed for public comment on November 14. As I stated in a recent Michigan Bridge article, while military defense is very important, especially these days, if you value outdoor recreation, our wild lands, and quality of life in our region, you would do well to quickly educate yourself on this proposal and make public comment as soon as possible. You have less than 5 days. The public comment period started only a few weeks ago on November 14, as deer hunters started rifle season, just before Thanksgiving, and closes on December 14, just 5 days away and before Christmas when many people are focused on holiday activities. Restricting public comment around the holidays is an old tactic to limit public comment. It's also a time when many seasonal residents are not in northern Michigan and may not have received proper notice.

The Michigan Air National Guard wants to expand its airspace and intensify its activities over the northern Lower Peninsula, Thumb, and Lake Huron, allowing military aircraft to fly further, more frequently, and lower overhead. If approved, military pilots will train across an additional 1,633 nautical square miles, including Huron, Tuscola, and Sanilac Counties, extending as far south as the Port Sanilac area. In a portion of the proposed flight zones in the Thumb, military aircraft would be allowed to train as low as 500 feet above the ground.

The proposed military training airspace expansion will result in increased and extended high levels of noise, well beyond those currently allowed by local ordinances. Other impacts will include increased air pollution in the form of fine particulates from jet fuel exhaust, increased potential for spills of fuel and other toxins, release of thousands more of decoy chaff and flares by aircraft each year resulting in the discharge of magnesium oxide, magnesium chloride, and magnesium fluoride over water and land, greatly increased potential for accidents involving civilians, catastrophic bird strikes particularly large migratory waterfowl, and increased military presence, potentially even foreign military personnel.

At the same time, the Michigan Army National Guard, is proposing a huge expansion of its use State land and to double the size of the Camp Grayling

military installation in the northern lower peninsula. The Alpena Special Use Airspace is already considered the largest overland training airspace east of the Mississippi River. Again, most of us realize military preparedness is critical, but at this rate, we run the risk of our State becoming militarized well beyond our control and any reasonable person should ask whether all of this is absolutely necessary.

For more details and a map of the proposed expansion of the combat training zones across Michigan, see the Bridge Michigan article at this link: <https://www.bridgemi.com/michigan-environment-watch/anger-over-national-guard-air-training-plan-over-grayling-and-thumb>

Fortunately, Thumb Land Conservancy member, Cliff Stuehmer of Huron County, is extremely informed on this proposal, has made extensive public comment, and has provided us with the following summary of the Michigan Air National Guard Environmental Assessment. Those of you living in Huron County, Tuscola County, and northern Sanilac County should pay special attention to this summary and make public comment by midnight on December 14, which is this coming Wednesday.

Can You Hear Me Now?

By Clifford Stuehmer
Alpena Special Use Airspace resident
Port Hope, Michigan

A brief summary of the things the Michigan Air National Guard's Environmental Assessment is not saying out loud.

- Air combat training includes climbing, diving, turning, and multiple passes over the same area.
- F-16s at 500 feet generate 115 dBA noise levels. That is eight times louder than an A-10 ("Warthog"), louder than the maximum level in the audience at a rock concert, at the threshold of "uncomfortable" for people and eight times louder than your typical County/Township noise ordinance (85 dBA). This comparison can be found in the Environmental Assessment (EA) on page 39, Figure 3.1. This is also the level at which the Secretary of the Air Force requires hearing

protection for all Air Force personnel ON or OFF base (Air Force Instruction AFI 48-127).

- When an F-16 passes overhead at 500 feet, you will be unable to communicate with someone standing three feet away from you without shouting for approximately 20 seconds. This “Shout Zone” extends about 2.5 miles to either side of the flight path (decreasing shouting time period as you approach 2.5 miles to either side of the aircraft).
- The EA touts a “seasonal” flight restriction concession to help reduce the significant negative impact the noise of low altitude jet combat training will have on tourism along the shoreline. This is an admission of significant impacts from the high noise levels. However, it is an empty concession that does nothing for the full time residents along the shoreline or boaters/kayakers more than 1 mile offshore.
- The prior Foreign Military Sales pilot training Environmental Impact Statement quotes a 0.65% average decrease in property value for each dB increase in Day-Night Average Sound Level (DNL). This translates to about a 4% property value decrease for those areas showing a 6 dB DNL increase in noise in this EA.
- The Aircraft Owners and Pilots Association (AOPA) opposed the proposed changes as early as 2018 and more recently requested the more thorough Environmental Impact Statement (EIS) in July of 2019. These professional and amateur pilots and aircraft owners indicate the Special Use Airspace (SUA) changes will significantly affect the safety and economy of civilian air use.
- Particulates emissions from low altitude training (below the 3000’ mixing level) will settle on our farms, yards, Lake Huron, and into the deepest parts of our lungs.
- Potential bird strikes are downplayed by mention of the Air National Guard’s use of the BASH computer program yet there is no mention in the EA of the Sandhill Crane, one of the largest birds in North America, which routinely migrates in formations in the Military Operations Airspaces (MOAs) well above 500 feet and outside and above the “seasonal” flight restrictions. Nor is there any mention of Canada geese.
- This EA mentions that bringing jet air combat training down to 500 feet in the proposed MOA airspace would be a cost save to an organization with an annual budget of \$234 BILLION.

The points noted above are why a Finding Of No Significant Impact (FONSI) for this proposal is not only wrong, but an insult and an injustice to the people that live, work and play within the Alpena SUA.

Selfridge Air National Guard Base is wholly owned by the Air National Guard and does not share facilities or airspace with a civilian airport such as Burlington, Vermont or Madison, Wisconsin. The speculative next step, once the SUA is permanently changed, will be to base the Foreign Military Sales program Singaporean F-16s and F-35s at Selfridge ANGB. These won't be our US pilots learning valuable combat skills, but rather foreign "customers" using our environment for field testing their new equipment. The proposed SUA changes look to be a perfect set-up for this.

I urge you all to review and discuss the Draft EA and comment to your governing entities, including the County Board of Commissioners, your local and state elected representatives and Governor Whitmer.

Here is the link to the Draft

EA: https://www.alpenacrtc.ang.af.mil/Portals/12/documents/AirSpace%20Documents/Draft%20EA_Alpena%20SUA%20Complex_MainBody_November%202022.pdf?ver=Ey56o_w9iSiyQBSEw-O16w%3d%3d

EA and FONSI comments can be emailed to:

NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil with the subject line "ATTN: Alpena SUA EA" before December 15.

This proposal is expected to be approved and implemented late summer 2023.

Clifford Stuehmer is a retired Ford Motor Company Engineering Supervisor. He was the supervisor of the Advanced Powertrain Rear Wheel Drive Noise, Vibration, and Harshness Section for nine years. He was nominated for two Henry Ford Technology awards. He earned a Master's Degree in Mechanical Engineering from Oakland University in Rochester, Michigan. He currently lives in Port Hope, in the Thumb.



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