



United States Department of the Interior

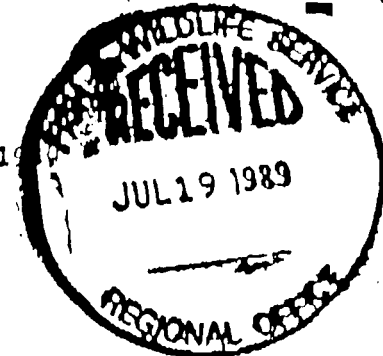
OFFICE OF ENVIRONMENTAL PROJECT REVIEW

230 S. DEARBORN, SUITE 3422
CHICAGO, ILLINOIS 60604



ER-89/543

July 10, 1989



Mr. Greg Huntington
Construction and Facilities Office
Michigan Department of Military Affairs
2500 S. Washington Avenue
Lansing, Michigan 48913

Dear Mr. Huntington:

The Department of the Interior (Department) has reviewed the draft environmental impact statement (statement) for the proposed mission expansion and multiple construction, Camp Grayling Army National Guard Training Site in Crawford, Kalkaska, and Otsego Counties, Michigan, and provides the following comments and recommendations.

General Comments

The statement adequately describes the existing fish and wildlife resources and evaluates general project construction impacts. We concur that construction activities should have minimal impacts on fish and wildlife resources. However, we have several concerns related to impacts from operational activities on endangered and threatened species.

Specific Comments

The statement identifies Houghton's goldenrod (*Solidago houghtonii*) as a state-listed threatened plant species occurring on Camp Grayling (Page 4-5.15). Please note that this species has now been listed as a federally-listed threatened species, as well (Federal Register 27134, July 18, 1988).

The document describes the location of bald eagle (*Haliaeetus leucocephalus*) nests in and around the post (Page 4-5.44) and describes parts of the Management Guidelines from the Northern States Bald Eagle Recovery Plan. Although construction activities proposed in the statement will not affect the bald eagle, future operations have the potential to affect the species. The final statement should include a commitment from the Department of Military Affairs to follow the Management Guidelines in the event bald eagle foraging or nesting areas may be affected by future military activities.

The statement also describes the historic and present use of Camp Grayling lands by the Kirtland's warbler (*Dendroica kirtlandii*), the potential impacts to this species, and mitigation (Pages 4-5.41 to 4-5.43 and 4-5.48 to 4-5.49). The statement includes a draft copy of a Memorandum of Agreement between the Michigan Department of Natural Resources and the Michigan Department of

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Military Affairs. We concur that the procedures outlined in this agreement will not affect the Kirtland's warbler, given the present species population level and the present distribution on Camp Grayling. However, if population levels and distribution change in the future, the National Guard Bureau should consult with the U.S. Fish and Wildlife Service (Service), in accordance with Section 7 of the Endangered Species Act of 1973 (Act), as amended.

The document is unclear concerning "developing habitat" for the Kirtland's warbler. Two tracts of developing habitat are located in the T2 Multi-Purpose Range Complex. From the discussion in the statement, it appears that this area will not be protected, even if warblers are present, unless the total warbler population falls below 200 pairs. Please be aware that even if this area is not posted, as is currently proposed, all military personnel have legal obligations under the Act. In addition to Section 7 consultation requirements for Federal agencies, Section 9 of the Act prohibits any person (private, State or Federal) from "taking" an endangered or threatened species. The Act defines the term "taking" to include "harassing," which the regulations define as disturbing an animal such that normal behavioral patterns, such as breeding and feeding, are significantly disrupted. Therefore, it is incumbent upon the Department of Military Affairs to avoid all activities that would "take" or "harass" any Kirtland's warblers using these, or other, "developing habitat" areas in the future.

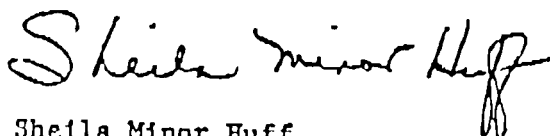
If it is determined that any future activities on the post may affect federally-listed endangered or threatened species, Section 7 consultation with the Service should be initiated. Requests for informal consultation should be directed to the Field Supervisor, U.S. Fish and Wildlife Service, 1405 S. Harrison Road, East Lansing, Michigan 48823. Requests for formal consultation should be directed to the Regional Director, U.S. Fish and Wildlife Service, Federal Building, Fort Snelling, Twin Cities, Minnesota 55111.

Summary Comments

We do not anticipate adverse impacts from construction activities proposed in the document. However, we request that the statement be revised to clarify commitments to protect threatened and endangered species during operational activities.

The opportunity to provide comments is appreciated.

Sincerely,



Sheila Minor Huff
Regional Environmental Officer

- cc: U.S. EPA, Environmental Review Branch, Chicago, IL (SME)
- bcc: RD, FWS, Twin Cities, MN ✓
- RD, NPS, Omaha, NE
- Environmental Affairs, USGS, Reston, VA
- Acting Director, OEPR, WASO