

**FEDERAL AVIATION ADMINISTRATION**  
**ADOPTION ENVIRONMENTAL ASSESSMENT**  
**AND**  
**FINDING OF NO SIGNIFICANT IMPACT**

**Grayling Temporary Military Operation Area**  
**Michigan Air National Guard**  
**Alpena, Michigan**

**Introduction**

This document serves as the Federal Aviation Administration's (FAA) adoption of the Department of Defense (DoD) United States Air Force (USAF) National Guard Bureau's (NGB) Environmental Assessment (EA) and Finding of no Significant Impact (FONSI) for the establishment of the Grayling Temporary Military Operation Area (MOA) near Alpena, Michigan.

The Final EA analyzed the potential environmental impacts associated with establishing the Grayling Temporary MOA to provide segregated airspace in support of the DoD's aircraft training needs. The proposed action is subject to environmental review under the National Environmental Policy Act (NEPA) of 1969 as amended (42 United States Code [U.S.C.] §4321, et seq.). NGB's EA was prepared in accordance with NEPA, Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and FAA Order 1050.1F, Environmental Impacts: Policies and Procedures. NGB's EA has been independently reviewed by the FAA.

**Background**

The Air National Guard (ANG) prepared an EA to consider the potential consequences to the human and natural environment associated with the establishment and utilization of the Grayling Temporary Military Operations Area (MOA) as part of the Alpena Special Use Airspace (SUA) Complex. The purpose of the action is to periodically establish temporary SUA around the Grayling Air Gunnery Range to support Alpena Combat Readiness Training Center's (CRTC's) exercise objectives. The Proposed Action would:

- (1) Accommodate realistic exercise training options during ingress into and egress out of the Grayling Air-to-Ground Gunnery Range (Grayling Range);
- (2) Allow for all-angle realistic surface attacks, threat reaction tactics, air-to-air combat maneuvering, and joint air-to-ground operations near R4201A/B; and
- (3) Provide direct and full access from Grayling Range to the Alpena SUA Complex.

**Proposed Action**

The Proposed Action is the establishment of the Grayling Temporary MOA around the Grayling Range training complex. The proposed Grayling Temporary MOA would underlay a portion of

the current Garland air traffic control assigned airspace (ATCAA) from 5,000 feet (ft) above mean sea level (MSL) up to 17,999 ft above MSL, and would be centered on and adjoining R4201A/B, and extend east to abut the Pike West MOA. The area below the proposed Grayling Temporary MOA is open, sparsely populated, with a small number of settlements. Under the Proposed Action, there would be no infrastructure changes, no ground-disturbing activities, no supersonic flight activities, no weapons firing, and no ordnance deployment within the proposed temporary MOA. The Proposed Action would not include any changes to operating hours, or activation schedules at existing Alpena SUA (e.g. Pike East MOA, Pike West MOA, and the Steelhead MOA).

Times of use would be from 0800 to 0200L (i.e. 8:00 a.m. to 2:00 a.m. the following day) local time. The temporary MOA would be activated by Notices to Airmen (NOTAM) with four hours advanced notice. The temporary MOA would normally be used in tandem with other SUA, but may be activated and used independently if the need arises. The temporary MOA would exclude the areas within R4201A/B when these restricted areas (RAs) are active. Other than the establishment of the Grayling Temporary MOA, the Proposed Action would not include any changes to the current operating hours or activation schedules at existing ranges.

The primary users of the Grayling Temporary MOA would conduct exercises with A-10, F-16, and F-35 aircraft. Transient users may conduct exercises with a wide variety of both fixed-wing aircraft and rotorcraft (e.g. F-15, F-18, AV-8, B-52, B-1, KC-10, C-130, C-17, RC-26, approved remotely piloted aircraft, MC-12, U-28, E-3, E-8, AH-1, UH-1, AH-64, H-60, CH-47 and AH-6). There would be approximately 20 sorties per day on average conducted within the temporary MOA, with approximately 10 percent occurring at night (2200-0200). There would be a maximum of 50 sorties on any given day, with as many as 10 sorties occurring between 2200 and 0200. There would be no aircraft operations in the temporary MOA between 0200 and 0700. The proposed temporary MOA would not be established for more than 45 days per year.

Operational activities would consist of MOA flight operations, including tactical combat maneuvering by fixed- and rotary-wing aircraft involving abrupt, unpredictable changes in altitude and direction of flight. Specifically the Grayling Temporary MOA would be used as a holding area for attack aircraft, an air-to-air refueling area, a maneuver area for electronic attack to augment the Alpena SUA Complex, and a maneuver corridor for attack aircraft on route for ordnance deliveries into the Grayling Range via R4201A/B. Other operational activities may include non-standard formation flights, close air support, electronic attack, and chaff and flare deployment.

Chaff and flare may be dispensed anywhere within the MOA which extends from 5,000 ft to 17,999 ft above MSL (approximately 3,600 to 16,600 ft above ground level (AGL)). The use of chaff and flare would be conducted in accordance with Air Force Instruction (AFI) 11-214 *Air Operations Rules and Procedures*, AFI 11-2 *Aircraft Rules and Procedures*, exercise participant commanders, and local directives. AFI 11-214 allows chaff and flare use only in approved airspace, and establishes a minimum altitude of 2,000 ft AGL for release of a flare over nongovernment-owned or controlled property. The Grayling Temporary MOA would extend down to approximately 3,600 ft AGL, and well above the minimum altitude of 2,000 ft AGL for release of flare.

## **Purpose and Need**

The purpose of the action is to periodically establish a temporary SUA around the Grayling Range

to support Alpena CRTC's exercise objectives. The need for the action is to (1) accommodate realistic exercise training options during ingress into and egress out of the Grayling Range; (2) allow for all-angle realistic surface attacks, threat reaction tactics, air-to-air combat maneuvering, and joint air-to-ground operations near R4201A/B; and (3) provide direct and full access from Grayling Range to the Alpena SUA Complex.

### **Alternatives**

Three alternatives to the Proposed Action were considered but not carried forward because they did not meet the purpose and need for the proposed action. An alternative to use existing low-level military training routes to access the Grayling Ranges was considered, but maneuvering within the route structure would be extremely constrained, and would only partially provide access to the Grayling Range. An alternative to use Stationary Altitude Reservations to conduct the training and provide direct access to the Grayling Range was considered; however, FAA regulations specifically prohibit aircraft training operations within Stationary Altitude Reservations. An alternative to use Temporary Flight Restrictions to conduct the training and provide direct access to the Grayling Range was considered; however, the DoD specifically prohibits aircraft training operations within Temporary Flight Restrictions. For these reasons, these alternatives to the Proposed Action were not carried forward in the EA.

NEPA implementing regulation at 40 C.F.R. §1502.14(d) specifically requires analysis of the “No Action” alternative in all National Environmental Policy Act (NEPA) documents. The No-Action Alternative would result in no change to the Alpena SUA and no establishment of the proposed Grayling Temporary MOA. Under the No Action Alternative, the training objectives established for training at the Grayling Range would not be attained. The No Action Alternative would not allow for realistic training options during ingress and egress in the Grayling Range, and would only provide limited access to R4201A/B and limited access from Grayling Range to Garland ATCAA and other Alpena SUA. Although the No Action Alternative does not meet the selection criteria or fulfill the purpose and need of the action, it was carried forward for detailed analysis in the EA, as required under NEPA.

### **Impact Analysis**

The Proposed Action would have short- and long-term less than significant adverse effects on airspace management, noise, biological resources, cultural resources, and safety. Short-term effects would cease and return to existing conditions during periods when the temporary MOA was not active.

**Airspace Management.** The Proposed Action would have short- and long-term less than significant adverse effects on airspace use and management. Effects would be due to heightened activity during exercises and a general increase in training within the Grayling Temporary MOA. Activation of the Grayling Temporary MOA (1) would not result in violations of FAA or DoD criteria; (2) would not undermine the safety of military, commercial or civilian aviation; (3) would minimize the possibility of destructive or distracting effects to ground-based activities, persons, structures or wildlife; and (4) would not create unacceptable conflicts, congestion, delays or economic hardship for non-participating aircraft. Detailed descriptions of the affected environment and analysis of the environmental consequences associated with airspace management are in Section 3.1 of the EA.

**Noise.** The Proposed Action would have short- and long-term less than significant adverse effects on the noise environment. Short-term effects would be due to noise from a temporary increase in low- to mid-altitude military overflights over rural and remote areas. During the time the Grayling Temporary MOA was active there would be a readily perceptible increase in the overall noise environment; however, these increases in noise would be widely dispersed and not concentrated in any one area. Long-term effects would be similar in nature and overall level as the short-term effects, but would occur during the periodic reestablishment of the Grayling Temporary MOA. The Proposed Action would not increase the day-night sound level by more than 1.5 dBA DNL in a noise sensitive area that is exposed to noise above 65 dBA DNL. Individual overflights, would at times be loud at ground level, but would be widely dispersed and not concentrated in any one location. Detailed descriptions of the affected environment and analysis of the environmental consequences associated with noise are in Section 3.2 of the EA.

**Biological Resources.** The Proposed Action would have short- and long-term less than significant adverse effects to biological resources. Short-term effects would be due to increases in aircraft overflight noise during training exercises. Long-term effects would be similar in nature and overall level as the short-term effects but would occur during the periodic reestablishment of the Grayling Temporary MOA. The Proposed Action would not (1) reduce the distribution or viability of species or habitats of concern; (2) jeopardize the continued existence of a Federally listed threatened or endangered species; or (3) result in the destruction or adverse modification of Federally designated critical habitat. Additionally, the Proposed Action would not disturb a bald or golden eagle to a degree that causes, or is likely to cause, injury to an eagle, a decrease in its productivity, or nest abandonment. Detailed descriptions of the affected environment and analysis of the environmental consequences associated with biological resources are in Section 3.3 of the EA.

There are established eagles nests within the Proposed Grayling Temporary MOA, particularly around the Au Sable River and larger lakes. There is a small possibility of an aircraft colliding with an eagle, or another bird species throughout the area. Most bird species migrate at altitudes below 3,000 ft AGL which would not be affected by the proposed action; however, some species, including eagles can migrate as high as 5,000 to 10,000 feet AGL. The Alpena CRTC maintains and executes its Bird/Wildlife Aircraft Strike Hazard (BASH) Plan which provides guidance for BASH reduction in areas where flying operations are conducted (MIANG 2016a), including migratory bird species such as eagles. The BASH Plan applies to all Alpena CRTC members, Geographically Separated Units, and transient/deployed units to the Alpena CRTC and its associated training areas and airspace. Additionally, the USAF Bird Avoidance Model and Avian Hazard Advisory System depict relative risk of bird hazards for the continental U.S. and Alaska (USAF 2015b). These tools are constructed with the best available geospatial bird data for analysis and correlation of bird habitat, migration flyways, breeding characteristics, key environmental factors, and geospatial data to reduce the in-flight risk of bird collisions with aircraft. With these programs and systems in place the effects of the propose action on bird migrating species, including eagles, would be less than significant.

**Cultural Resources.** The Proposed Action would have short- and long-term less than significant adverse effects to cultural resources. Effects would be due to the introduction of intermittent aircraft overflight noise to the settings of historic properties while the Grayling Temporary MOA

was active. Long-term effects would be similar in nature and overall level as the short-term effects but would occur during the periodic reestablishment of the Grayling Temporary MOA. The Proposed Action would not (1) result in impacts to an historic property that meets one or more of the Section 106 Criteria of Adverse Effects (36 CFR §800.5). In addition, no tribe has responded to scoping letter requests for information that a culturally significant place or property would be adversely affected. The Proposed Action does not include construction, demolition, ground disturbance, renovation, infrastructure upgrades, weapons firing, ordnance deployment, or low-level or supersonic aircraft operations. As such, the Proposed Action would have no potential to impact archaeological resources. Detailed descriptions of the affected environment and analysis of the environmental consequences associated with cultural resource are in Section 3.4 of the EA.

**Health and Safety.** The Proposed Action would have short- and long-term less than significant adverse effects to health and safety. Effects would be due to incremental increase in risk of bird aircraft strike hazards, accidental mishaps, or contact with non-participating aircraft. Long-term effects would be similar in nature and overall level as the short-term effects but would occur during the periodic reestablishment of the Grayling Temporary MOA. Effects would not (1) violate any DoD or FAA criteria, (2) cause or allow military operations to come into contact with non-participating aircraft while engaging in training or transitional activities, or (3) cause or allow military aircraft to operate in areas known for bird migration or habitat. Detailed descriptions of the affected environment and analysis of the environmental consequences associated with safety are in Section 3.5 of the EA.

**Resources with Negligible Effects.** The proposed action would have negligible effects on the following resource areas:

- Air quality
- Climate
- Farmlands
- Hazardous materials, solid waste, and pollution prevention
- Visual resources
- Water resources
- Land use
- Socioeconomic, environmental justice, and children’s environmental health and safety

Future conditions with respect to these resources would be indistinguishable from existing conditions with the implementation of the Proposed Action. Section 1.4 of the EA provides a brief overview of, and a discussion of the limited effects on, each of these resources.

### **Public Involvement**

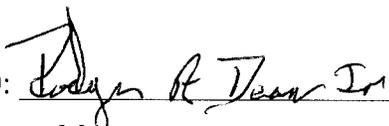
The National Environmental Policy Act, 40 CFR 1500-1508, and 32 CFR §989 require public review of the EA before approval of a Finding of No Significant Impact (FONSI) and implementation of the Proposed Action. A Notice of Availability for public review of the Draft EA was published in the Alpena News, Crawford County Avalanche, and the Gaylord Herald Times. The Draft EA was available for public review during the 45-day public review period at the following locations: Devereaux Memorial Crawford County Library, Grayling, MI; Oscoda County Library, Mio, MI; Lewiston Public Library, Lewiston, MI; Presque Isle District Library, Onaway, MI; and Otsego County Library, Gaylord, MI. It was also available online during this period at <https://www.alpenacrta.af.mil/>.

**Finding**

The FAA has determined that no significant impacts would occur as a result of the Federal Action. Therefore, preparation of an Environmental Impact Statement is not warranted and a Finding of No Significant Impact in accordance with 40 C.F.R. Section 1501.4 (e) is appropriate.

**Approval Statement**

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies, objectives, and requirements as set forth in Section 101(a) of NEPA, as amended, and that it will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2) (C) of NEPA.

APPROVED:  DATE: 05/21/2019

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