

The logo consists of two blue, curved lines that sweep upwards and then downwards, resembling a stylized wave or a protective shield.

# ALLIANCE FOR THE GREAT LAKES

ENSURING A LIVING RESOURCE FOR ALL GENERATIONS

Commander Gustav Wulfkuhle  
Enforcement Branch  
Ninth Coast Guard District  
1240 E. 9th Street  
Cleveland, OH 44199

RE: Docket # CGD09-06-123

Dear Commander Wulfkuhle:

The Alliance for the Great Lakes and the undersigned organizations appreciate this opportunity to comment on the United States Coast Guard's proposed use of the Great Lakes for live fire training exercises within "safety zones." As I write this letter, our Great Lakes, home to 20% of the world's fresh surface water, are balancing on the tip of their ecological breaking point. Esteemed scientists from around the region have agreed: restore the resilience of the lakes, or we may push them beyond the point of no return.

The Great Lakes are not immune to global conflict, and we recognize the need to enhance security nationwide. However, there are significant gaps in the Coast Guard's justification for such a broad training program. Rather than assuming that the "safety zones" are what's best for the Great Lakes, we ask that you expand on your commitment to the ecosystem by performing the following actions prior to implementation:

- Perform a substantive environmental review that fulfills requirements of the National Environmental Policy Act (NEPA);
- Reduce the number of live fire sites to the level critically necessary for training; and
- Consider a full spectrum of alternative strategies including off-water simulation and use of non-lead bullets.

The healthy future of the Great Lakes is wholly reliant on how we choose to intervene. Having spent over a century inflicting damage upon our own backyard, Great Lakes citizens recognize that it is their responsibility to restore the lakes to greatness. Action is critical not only for environmental reasons, but to restore the economic services the lakes provide. The lakes are resource for all of us to both *use* and *protect*.

We applaud the Coast Guard's role in supporting the safe use and enjoyment of the lakes. Current and retired Coast Guard staff have donated their most valuable resource – their time – to improve and enhance recreational beaches in Chicago, Indiana, and Michigan through the Alliance's Adopt-a-Beach program. This commitment to cleaning up the Great Lakes with the help of friends and family speaks volumes about the Coast Guard's dedication to a healthier Great Lakes.

Only after the Coast Guard demonstrates the same commitment to thorough public study of reasonable Great Lakes security options will the citizens of the region be certain that the “safety zones” are in the best interest of both national security and the Great Lakes themselves.

#### A Substantive Environmental Assessment Is Critical

We do not agree with the Coast Guard’s preliminary conclusion in the federal register notice that this proposal should receive a categorical exclusion from NEPA requirements. The Coast Guard appears to have made two substantial assumptions: that the live fire program as described is critical to national security and that it will not result in significant impacts to the Great Lakes. The Alliance takes issue with both assumptions.

Surely a decision to create 34 zones where long-distance lead ammunition will be fired during boating season on a water body that has been demilitarized for nearly two centuries constitutes a major federal action under NEPA. Given that, this decision should be subjected to an environmental assessment or, preferably, an environmental impact statement. The Coast Guard must consider a full set of alternatives prior to implementing any security program on the Great Lakes.

#### Reduce the Number of Training Sites

Despite a legacy of pollution, the waters of the Great Lakes continue to provide unparalleled recreational opportunities, and we find that those who know the lakes best are often those who use it the most. The Great Lakes support a \$5 billion sportfishery – an industry that is absolutely dependent on recreational boating. Tourism and recreation is the lifeblood of our regional economy. At a time when economic growth is critical to the Great Lakes states, we should be doing everything we can to keep our Great Lakes open and welcoming for recreation. As part of the NEPA analysis, we ask that the Coast Guard develop a new iteration of the plan with the full cooperation and support of recreational boaters and anglers. The focus of this plan should be a reduction in the number of training sites to a level that is agreeable to the recreational user community.

#### Consider Lead Reduction Strategies

As the Coast Guard performs a NEPA-compliant analysis of the program, we urge it to consider the full range of lead reduction strategies. The Great Lakes are virtually a closed system, with less than one percent of the water in the lakes renewed each year. This means that what we put in the lakes generally stays in the lakes. As a result, pollutants have been building up in the Great Lakes ecosystem for many years. Some persistent chemicals, including lead compounds found in bullets, can enter the food chain at the most basic levels, ending up in humans through the fish we eat and the water we drink. They build up in the bodies of animals and people, and affect development and survival for generations. Persistent chemicals have been linked to developmental delays in children, attention deficit disorders, impaired immune systems, reproductive disorders, even diabetes and heart disease.

The Alliance has serious concerns over the long-term impacts of lead deposition in the Great Lakes. Under the current live firing plan, the Coast Guard would nearly **double** the annual amount of lead discharged to surface waters from the entire state of Michigan into the Great Lakes. Unfortunately, the Coast Guard’s “Preliminary Health Risk Assessment for Proposed U.S. Coast Guard Weapons Training Exercises:”

- Provides only a short-sighted, 5-year outlook for potential problems;
- Does not consider the locations of critical habitat, special – status species or potable water intakes; and
- Fails to account for cumulative regional impacts of lead on organisms at the bottom of the food chain.

The study used a numerical “screening quotient” score for pollutants that will be released to the lakes. Scores of 1 or more are deemed “risks requiring further evaluation.” The screening score for lead was .96. With the Great Lakes at a tipping point of ecosystem meltdown, the score is more than high enough to warrant further evaluation of the potential cumulative impacts on our international treasure. Rather than pursue the increased deposition of lead into our already hard-hit waters, the Alliance asks the Coast Guard to pursue specific lead-reduction strategies including the use of non-lead bullets and on-shore simulators such as those used at Great Lakes Naval Training Center in Lake County, Illinois.

### Conclusion

At a time when regional leaders are rallying around a multi-billion dollar plan to restore the Great Lakes, the Coast Guard – the Guardians of our Great Lakes – must show leadership to ensure their actions will not result in further degradation. The Alliance does not believe impacts from live fire have been adequately examined. The burden of proof is on the Coast Guard to demonstrate that live fire exercises on the Great Lakes are both necessary and safe. Until this has been done to the public’s satisfaction, we ask that you postpone implementation of the plan as described.

Formed in 1970, the Alliance for the Great Lakes (formerly the Lake Michigan Federation) is the oldest independent Great Lakes citizens’ organization in North America. Our mission is to conserve and restore the world’s largest freshwater resource using policy, education and local efforts, ensuring a healthy Great Lakes and clean water for generations of people and wildlife. Please do not hesitate to contact me at 312-939-0838 x224 or [jbrammeier@greatlakes.org](mailto:jbrammeier@greatlakes.org) with any questions or concerns.

Sincerely,

Joel Brammeier  
Associate Director for Policy