



*An international coalition promoting and coordinating basin-wide initiatives to protect and restore the Great Lakes and St. Lawrence River*

November 13, 2006

Rear Admiral Crowley  
Commander, Ninth Coast Guard District  
1240 East 9<sup>th</sup> Street, Room 2069  
Cleveland, Ohio 44199

Re: Proposed Permanent Safety Zones on the Great Lakes (Docket #: CGD09-06-123)

Dear Admiral Crowley:

I am writing on behalf of the Great Lakes United coalition in response to the proposal to establish 34 permanent safety zones in the Great Lakes. Great Lakes United is an international coalition of groups and individuals in Canada, the United States, First Nations and tribes dedicated to the protection and restoration of the Great Lakes- St. Lawrence River basin.

Great Lakes United recognizes the need to properly train Coast Guard personnel and we are extremely grateful for the critical role the Ninth District plays in protecting the public on a daily basis. We also recognize the seriousness in which the Ninth District has responded to the intense public interest to this issue. We appreciate your efforts to extend the public comment period, hold hearings across the region, and for the Admiral's commitment to attend all hearings personally. However, Great Lakes United opposes the establishment of 34 permanent safety zones in the Great Lakes as proposed. Please find our concerns and unanswered questions, as well as urgent recommendations to move towards resolution listed below.

Live fire training on the Great Lakes presents serious risks to the public and to the environment, would permanently alter the public perception of the lakes and strain the international relationship between the United States and Canada. Great Lakes United has the following concerns and questions:

Concerns and unanswered questions regarding boater and public safety:

- Great Lakes United is very concerned with public safety issues, as one accident associated with the use of weapons could be fatal. How will boaters who do not monitor the maritime channel before their voyage, or may be operating non-motorized vessels without radios, become aware of live fire training? How will Canadian boaters who may be moving across the international border become aware of live fire training? Will boaters without GPS/location devices to locate and avoid the live fire zones be at an elevated risk?
- Because altitude requirements over water could allow aircraft close proximity to live fire operations, is communication with the Federal Aviation Administration necessary?
- Is there a safety risk to beach goers associated with unspent ammunition washing up on shore?



*An international coalition promoting and coordinating basin-wide initiatives to protect and restore the Great Lakes and St. Lawrence River*

- Are there locations within the proposed safety zones that that experience high volumes of recreational or commercial use? Are there shore-side chemical facilities, nuclear power plants near the safety zones? Following, could a 7.63mm bullet travel beyond the safety zone or reach the shoreline under specific conditions associated with boat pitch, wind speed, or other factors?

Concerns and unanswered questions associated with the environment:

- Great Lakes United is concerned that the environmental study commissioned by the Coast Guard to determine environmental risk is inadequate. Given the large amount of lead that would be introduced into the environment, the potential risk to a massive drinking water reservoir, the lack of an assessment of cumulative impact over time, as well as the lack of an assessment of impact to critical habitats or protected species, a full federal assessment under the National Environmental Policy Act is warranted.
- Metals, including lead, will be introduced into the water column and potentially increase contamination to aquatic species. Consumption advisories are already in place for many fish species. Will live fire training increase the human health risks associated with fish consumption? Would segments of the population that consume higher levels of Great Lakes fish, including tribes, be at a particular risk?
- Great Lakes United is concerned that the proposal is inconsistent with goals of the Great Lakes Water Quality Agreement, wherein the United States and Canada agreed to make a maximum effort to eliminate or reduce to the maximum extent practicable the discharge of pollutants into the Great Lakes. Are there alternatives that the Coast Guard could employ that would not undermine this international agreement?
- Are safety zones associated with migratory bird fly-ways, and if so, what impact will weapons training have on migration of birds?

Concerns with overall approach and unanswered questions associated with public perception:

- Great Lakes United is concerned that consultation with tribes has not occurred. Would permanent safety zones impair tribal treaty rights to waters of the Great Lakes?
- Did the Coast Guard consider alternatives to the establishment of 34 safety zones? Was cost associated with Coast Guard personnel transportation to alternate training sites a significant factor?
- Why is the Ninth District's current weapons training program inadequate?
- Great Lakes United is concerned over the lack of limitations articulated in the current proposal. Will limitations on the number of hours or days the safety zones could be used, and/or limitations on the number of rounds that could be used per exercise/per year be established?
- Great Lakes United is concerned that the approach to improving security around the Great Lakes is not being addressed holistically, or communicated as a holistic plan.
- Is there a risk of undermining the desirability of the Great Lakes as a recreational and boating destination due to the use of the Lakes for military training? What potential economic impact could this shift in perception cause?



*An international coalition promoting and coordinating basin-wide initiatives to protect and restore the Great Lakes and St. Lawrence River*

- Would the establishment of permanent safety zones undermine public interest in protecting the drinking water reservoir and freshwater ecosystem?

Relationship with Canada:

- Great Lakes United is gravely concerned that this proposal may be undermining the United States-Canada history of joint problem solving and political-cultural respect that has resulted in decades of successful binational resource management.

To answer these concerns, Great Lakes United recommends that the *Ninth District of the Coast Guard continue to refrain from weapons testing on the Great Lakes* in the proposed 34 safety zones until this issue is fully resolved, and:

- *Ensure a full assessment is performed under the National Environmental Policy Act, including the development of a range of alternatives to the existing proposal, including but not limited to, restricting all Coast Guard live fire trainings to the already established military safety zone at Camp Perry in Lake Erie;*
- *Work transparently with Canada to develop a holistic binational approach to security, including partnering with a Canadian entity to hear from the Canadian public on concerns with weapons testing on the Great Lakes.*

Thank you very much for serious consideration of Great Lakes United's comments. Please do not hesitate to contact me if you have any questions or need clarification.

Sincerely,

Jennifer Nalbhone  
Campaign Director, Great Lakes United