

November 10, 2006

Commander  
Ninth Coast Guard District,  
1240 E. Ninth, Room 2069  
Cleveland, OH 44199

Subject:  
Great Lakes Safety Zones  
Docket Number CGD09-06-123

Dear Commander:

Thank you for the opportunity to comment on the proposed safety zones for Coast Guard exercises in the Great Lakes. The Ludington Area Charterboat Association (LACA) is comprised of 69 USCG licensed Captains who operate Great Lakes fishing charters on the waters of Lake Michigan in the Ludington Michigan area and 45 non-licensed sport fishermen who also fish Lake Michigan in the Ludington Area. Also, more than 40 businesses from the vicinity of Ludington Michigan have joined our association to support our fishing and conservation goals, and to jointly advertise with us to serve the public who come to the area for fishing and recreation on the waters of Lake Michigan adjacent to Ludington.

While supportive of the United States Coast Guard's training needs for its personnel in regard to the United States Coast Guard's increased responsibilities related for Homeland Security, it is the position of the LACA that the USCG should not establish Live Fire Zones on the Great Lakes. The LACA has reached this conclusion for many reasons especially and primarily for the safety of traversing recreational boaters, charter and recreational fishermen. Also, the Great Lakes are relatively small, and the waters are ecologically sensitive. We believe the ecosystem of the great lakes could potentially be harmed in the long term as a result of the planned live fire exercises.

It is our position that the USCG could adequately train its personnel in other less heavily used, traveled, and ecologically sensitive areas of the United States without undue hardship.

If the USCG decides to proceed with its plan to establish Live Fire Zones in the Great Lakes over the objections of the LACA and many others, we believe the number, locations, use, and times of operation of the zones should be substantially curtailed.

We propose that the zones be established on a temporary basis, and would not become permanent delineated areas on the charts of the Great Lakes. That the zones be limited in number to one or two at the most, for each Great Lake. Also that they be created at least 15 miles from the nearest point of land. All weapons firing should be directed away from the nearest points of land. Finally, we would recommend that such temporary zones would be operated only during the off seasons of the Great Lakes, specifically from November Through March, and then be used for the shortest possible time, using the smallest possible amount of ammunition.

To summarize: We do not believe these zones are necessary in the Great Lakes and oppose their creation. If created they should be few and temporary; located far offshore, and used minimally, and only during the off-season months of the year.

We appreciate the extended opportunity the USCG has provided for comments and public hearings and urge full and careful consideration of comments received during this period.

Sincerely,

Jim Fenner, President,  
Michigan Charter Boat Association  
Phone: 248-689-3487

*cc:* United States Representative Peter Hoekstra  
United States Representative Bart Stupak  
Ms. Rebecca Humphries, Director, Department of Natural Resources  
Mr. Steven E. Chester, Director, Department of Environmental Quality  
Ms. Dana Debel, Governor's Office