

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 Michigan Charter Boat Associations offers the following comments:

At its recent General Membership meeting, the Michigan Charter Boat Association (MCBA) voted to submit to the United States Coast Guard its position in regard to the proposed permanent Great Lakes Live Fire Training Zones. The MCBA members present, representing 422 USCG licensed member Captains operating on the Great Lakes adjacent to Michigan, voted unanimously to submit the following statement:

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 to Homeland Security, it is the position of the MCBA that the USCG should not establish Live Fire Zones on the Great Lakes. The MCBA has adopted this position for a variety of reasons, beginning with, but not limited to, the safety of mariners, fishermen, commercial, and general commerce. Further, the Great Lakes are relatively small, heavily traveled and the waters are ecologically sensitive. It is our position that the USCG could adequately train its personnel in other less heavily used, traveled, and ecologically sensitive areas without undue hardship.

Should the USCG determine to proceed with its plan to establish Live Fire Zones in the Great Lakes over the objections of the MCBA and many others, we believe the following criteria should be used to determine the establishment of; the number, locations, use, and times of operation of the zones.

First, we propose that the zones be established on a temporary, need to be used basis, which would not become permanent delineated areas on the charts of the Great Lakes. Secondly, that the zones be limited in number to one or two 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 used for the shortest possible time, using the smallest possible amount of ammunition, and be operated only during the off seasons of the Great Lakes, specifically from November Through March.

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.

In view of the concerns raised by us and others, and the value that could be gained by additional dialogue, we would urge the Coast Guard to strongly consider withholding judgment on creating these zones, at the very least until it gains experience with temporary designations,.

We appreciate the extended opportunity to comment and urge full and careful

consideration of these comments as the Coast Guard undertakes the public hearings associated with this comment period.

Sincerely,

Richard Stafford, President,
Michigan Charter Boat Association
Phone: 906-789-0110

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