

On behalf of the Huron Potawatomi Tribe, I am submitting comments in regards to Coast Guard Docket ([USCG-2006-25767; CGD09-06-123) pertaining to the live fire exercises within the Great Lakes. In the August 1, 2006 Federal Register Notice, the information published in the Protection of Children, Indian Tribal Governments and Environment sections are of great concern to this Tribe. On May 18, 2004, President Bush issued the Regional Collaboration: Interagency Task Force Executive Order (EO). Section 1 of the EO states: The Great Lakes are a national treasure constituting the largest freshwater system in the world. The United States and Canada have made great progress addressing past and current environmental impacts to the Great Lakes ecology. The Federal Government is committed to making progress on the many significant challenges that remain. Along with numerous State, tribal, and local programs, over 140 Federal programs help fund and implement environmental restoration and management activities throughout the Great Lakes system. A number of intergovernmental bodies are providing leadership in the region to address environmental and resource management issues in the Great Lakes system. These activities would benefit substantially from more systematic collaboration and better integration of effort. It is the policy of the Federal Government to support local and regional efforts to address environmental challenges and to encourage local citizen and community stewardship. To this end, the Federal Government will partner with the Great Lakes States, tribal and local governments, communities, and other interests to establish a regional collaboration to address nationally significant environmental and natural resource issues involving the Great Lakes. It is the further policy of the Federal Government that its executive departments and agencies will ensure that their programs are funding effective, coordinated, and environmentally sound activities in the Great Lakes system.

As one of the 12 Federally Recognized Tribes within the State of Michigan, the Tribe's Environmental Department and I were active participants in the Great Lakes Regional Collaboration (GLRC) and in the development of the Great Lakes Strategy. As such, we are vocal proponents to restore the ecosystems within the Great Lakes basin from existing contamination and protect them from future degradation.

Numerous Treaties between the United States government and this Tribe as sovereign entities have been completed over the years. Similar Treaties have been made with each of the other 34 Tribal Nations that reside within the boundaries of the Great Lakes Basin. As a result, any activity done by one of the sovereigns which could potentially have an impact on the other sovereign requires thorough consultation between both parties. To date, we have not been contacted by the Coast Guard to discuss the plans of the Coast Guard. We have not heard from any of the other 34 Tribal Nations that they have been contacted by the Coast Guard regarding their plans. This is unacceptable.

The Environment Section of the Coast Guard Federal Register Notice states that the action is covered under the Figure 2-1, paragraph (34)(g). This exclusion is only applicable to the process of rulemaking. It does not cover the actual live fire exercises. During the exercises, a high amount of lead will be "disposed" into 34 large areas of each of the 5 Great Lakes. The lead will have direct impacts on the fisheries in those areas. Additionally, these areas are fly ways for migratory waterfowl (ducks, geese, cranes, etc). Because of the direct health impacts caused by lead shot to fish and waterfowl and the indirect health impacts to humans, all commercially available hunting shells now contain steel shot instead of lead. This regulatory change documenting the hazard of lead shot (bullets) in water environments has been in affect for many years. Goal 1 of the GLRC Toxic Pollutant Strategy Team is to "eliminate the discharge of any or all persistent toxic substances (PTS) to the Great Lakes basin ecosystem". Bullets made of lead (or depleted uranium), a persistent toxic

substance, "discharged" randomly into the "training zones", would be in direct conflict with the Great Lakes Strategy. Additionally, the Great Lakes Strategy identifies 40 Areas of Concern (AOCs) where there are contaminated soils/sediments on both United States and Canadian coast lines. The 34 live fire zones would almost double the quantity of AOCs in the Great Lakes Basin. The discharge of this toxic into the world's largest fresh water system would be morally wrong as well as environmentally undesirable.

Today, thousands of Tribal members in the Great Lakes Basin subsist on fish and waterfowl as their ancestors have done for thousands of years. The primary ingredient in their diet is the fish, waterfowl and game that they bring in according to the hunting, fishing and gathering Treaties that have been made with the United States Government. The deliberate pollution/destruction of the quality of the fish/waterfowl is in direct violation of the treaties. Asking them to change their diet to avoid this problem would be synonymous to asking every American citizen to ride a bicycle to work instead of driving their car. This too is morally wrong as well as environmentally intolerable.

A large portion of the Tribal population is children. As a result of the subsistence needs of thousands of Tribal families, a large population of Tribal children will potentially ingest food that has been exposed/contaminated with lead. Traditional risk assessments do not take into consideration the more frequent meals with potentially contaminated foods which will result in a much greater risk. As stated in the Federal Register notice, EO 13045 Protection of Children from Environmental Health Risks and Safety Risks. This is completely detrimental to the health and welfare of these children.

As a result of the above problems associated with the information published in the Federal Register notices, this action will require an environmental impact statement to be prepared that involves direct consultation with all of the Tribal governments in the area as well as reviewing all of the potential direct and indirect impacts to human health and the environment. It would be prudent for the Coast Guard to identify an alternate location(s) in which to conduct these activities.

Sincerely,

Laura W. Spurr  
Nottawaseppi Huron Band of Potawatomi  
Tribal Chairperson