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## OHIO COASTAL RESOURCE MANAGEMENT PROJECT

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USCG-2006-25767-474

Docket Management Facility (USCG-2006-2567)  
U.S. Department of Transportation, Room PL-401  
400 Seventh Street, SW.  
Washington, DC 20590-0001

FAX: 202-493-2251

Re: Safety Zones: U.S. Coast Guard Water Training Areas, Great Lakes

The Ohio Coastal Resource Management Project (OCRMP) is a nonprofit citizens organization, that has worked for over 20 years for sustainable use of Ohio's most valuable natural resource, Lake Erie. OCRMP commends the U.S. Coast Guard for extending the comment period for the proposed live fire zones in Lake Erie and the rest of the Great Lakes. However, we note that the Coast Guard did not suspend their intentions so live firing already started (since suspended). Since fall is a major recreational season on Lake Erie, we urge the Coast Guard to refrain from using live fire on Lake Erie before the general public is aware of the need to monitor the maritime channel before setting out on the Lake.

The question is not whether Coast Guard personnel should be trained to handle weapons but whether significant portions of the Great Lakes should be designated for live fire military training. Existing military training sites, including Camp Perry (Ohio National Guard) on Lake Erie, west of Port Clinton, Ohio should be used since the Coast Guard has not demonstrated the need for additional sites for live fire, nor have they considered the impacts of widespread ammunition debris or the cumulative impacts of more heavy metals on the Great Lakes.

Both the public and private sectors have already invested billions of dollars to restore the Great Lakes, with a new Great Lakes Regional Collaboration Restoration Strategy to complete their cleanup, for the benefit of everyone who lives, works or recreates in the Great Lakes watershed.

OCRMP objects to the U.S. Coast Guard's use of live fire on the Great Lakes for the following reasons:

- No demonstrated need for additional live fire zones;
- Importance of protecting the drinking water of 33 million people & sport fish consumption;
- Inadequate warning systems; and
- Economic effects on a substantial number of local communities that depend on recreational use of Lake Erie and all the Great Lakes.

In summary, OCRMP calls for the Coast Guard:

- To use existing live fire zones on the Great Lakes;
- To set specific limits in their rules on the number of live fire events per year, the number of days per event, and to ban live fire training during the recreation season, May through October;
- To conduct regular, budgeted, cleanups of these zones;
- To conduct further investigation of the cumulative impacts of lead, including existing sediments, and to prepare an Environmental Impact Statement;
- To use the broadcast media and also notify the FAA where & when live fire is planned;
- To change the designation of the 34 live fire zones from permanent to temporary, for a period no longer than 5 years;
- To conduct another public review in 5 years, regarding extension for another 5 years if the need is demonstrated; and
- To consult with Canada on Coast Guard live fire plans.

1) Please explain the level of threat that this unprecedented expansion of live fire training is to address.

There has been no need demonstrated to designate 34 permanent live fire zones, including four in Lake Erie, if, as stated, "The Coast Guard's use of these safety zones will be periodic in nature and will likely not exceed two or three one-day events per year" (Federal Register, August 1, 2006). The Coast Guard can utilize existing live fire zones on the lakes, including the site near Camp Perry, where people are used to such practices, including awareness of the hazards of ammunition debris.

We call for specific limits in the Coast Guard rules on the number of live fire events per year, the number of days per event, and a ban on live fire training during the recreation season, May through October.

The Toussaint River estuary has become almost unusable because of metal debris and unexploded ordnance carried there by currents, waves and storms. The former Erie Army Depot is located on a three mile stretch of beach on Lake Erie between the Toussaint River and Camp Perry. This U.S. Defense site was used during World War I and WWII for the testing and proof firing of Army artillery. The Ares Corporation, which is a tenant at the industrial park there now, currently test fires artillery into earthen berms, not into the water, to reduce the burden on Lake Erie.

Ordnance removals have been done every 1-2 years. Recently, more than 3,000 ordnance items were removed and about 13 tons of scrap metal were collected for recycling. About 2% of the ordnance recovered was live and had to be detonated on the beach. Ares Corp. and Camp Perry staff still walk the beach regularly to spot unexploded ordnance that washes up. Ordnance cleanups will probably continue for years, according to Ohio EPA.

2) Protecting the drinking water of 33 million people in the Great Lakes basin and the fish they eat is far more important than an "added tool" for the Coast Guard (Cleveland, 10-23-06). Lead is a legacy issue. It is urgent to reduce the toxics in the Great Lakes to protect our drinking water, public health and the environment. There is no need to add more lead and other heavy metals to the existing burden already in the sediments. The Preliminary Health Risk Assessment for Proposed U.S. Coast Guard Weapons Training Exercises (January 2006) states that the analysis did not include location-specific factors such as existing sediment concentrations of metals.

Children are more sensitive to lead than adults (Appendix A). IQ deficits are a tragedy that can be prevented. Effects of lead poisoning also include damage to the nervous system, kidneys, liver, sterility, growth inhibition, developmental retardation, and detrimental effects in blood (Risk Assessment, Appendix A, page 2). Questions have recently been raised about USEPA's lead standard (10 ug/liter of blood)--there may be no threshold for adverse effects of lead.

The Risk Assessment acknowledged that "plants and animals that exist at the bottom of the food chain might ingest and be directly exposed to the metals in the sediment." Yet the Assessment failed to include any evaluation of the existing lead concentrations in sediments, to which the lead from bullets would be added. Even so, the assumptions and uncertainties used resulted in a screening quotient for lead of 0.96--very close to 1.0 (Executive Summary, Table E-1). Therefore, we call for further investigation of the cumulative impacts of the Coast Guard's live fire exercises in every Great Lake, and preparation of an Environmental Impact Statement.

In addition, since the Risk Assessment covered only 5 years, no hazards were evaluated from a permanent designation. Therefore, OCRMP urgently requests that the designation be changed from permanent to temporary, for a period not to exceed 5 years. We call for another public review at the end of 5 years, regarding an extension for another 5 years if the need is demonstrated, and only if the further investigation of the health risks has been completed.

Rather than spreading heavy metals and ammunition debris in 34 more areas across the Great Lakes, the Coast Guard's live fire training must be concentrated at existing training sites. Regular cleanups of existing sites must be conducted, and budgeted, to reduce the burden on the Great Lakes, the vital source of drinking water for the 33 million people who live within the watershed.

3) Inadequate warning system: We deeply regret that this is the first time that armed ships have been on the Great Lakes since the War of 1812, except for a 21-gun salute in 2005, until this January! We have long worked for good relations with our neighbor Canada, who shares responsibility for protection of these national and international treasures. We urge further consultation with Canada on Coast Guard live fire plans.

While the Coast Guard plans to alert the public during such training exercises, using the maritime channel, OCRMP is concerned about communications with boaters who do not monitor the maritime channel before setting out on the lake, those without GPS units to locate live fire zones, and boaters who are moving across the international border from Canada. With live fire from small inflatables on the waves, small aircraft may also be at risk. Please notify the FAA. Please use the broadcast media in every area where live fire is planned, to alert the public.

We are also concerned about opportunities for human error, since these exercises are for trainees, not experts. A resident of Ottawa County, Ohio told me about an incident during practices for Operation Desert Storm in the existing live fire zone. The target was going in the wrong direction, so trainees aimed toward a beach on the shore rather than out into the lake. Bullets can also skip along the water or ricochet. Someone could get hurt!

4) Economic effects on local communities: The four live fire zones on Lake Erie occupy a significant portion of the U.S. section of Lake Erie. The risk of accidentally getting into trouble may have a chilling effect on recreational use of Lake Erie, a major tourism industry in Ohio. This includes boaters and anglers, plus sport divers, who explore the many historical shipwrecks all over the bottom of Lake Erie. The Lake Erie shoreline contributes \$9.45 billion a year in tourism and travel revenue to the Ohio economy, supporting about a quarter of a million jobs and nets \$5.8 billion in wages alone. Clearly, Lake Erie is a resource worth protecting and restoring.

In conclusion, OCRMP urges the U.S. Coast Guard to use only existing military training sites, to change designation of the 34 live fire zones from permanent to temporary, and to join with all of the eight Great Lakes states, the many federal agencies, and our neighbors in Canada in implementing the new Great Lakes Restoration Strategy, for the benefit of everyone who lives, works or recreates in the Great Lakes watershed, including Canada.

Thank you for this opportunity to express our concerns.



Edith Chase  
President