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Petoskey Regional Audubon Society
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LEAD POLLUTION
LOGS

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

RE: USCG-2006-25767-594
Safety Zones; U.S. Coast Guard Water Training Areas, Great Lakes

November 9, 2006

The Petoskey Regional Audubon Society requests that a new environmental impact study be conducted regarding the U.S. Coast Guard's proposed live fire training exercise Safety Zones in the Great Lakes. The preliminary risk assessment study does not adequately address many issues. Two subjects of great concern to us are 1) the release of large quantities of heavy metals into the Great Lakes, and 2) the potential impact of the exercises on wildlife, specifically regarding birds.

Lead, copper, antimony, and zinc are to be discharged into the Great Lakes during these exercises. The preliminary study claims that "no elevated risk to humans or the environment" will occur by the release of 7000 pounds of lead into the Great Lakes annually. Michigan's industries (combined) released 4069 pounds of lead into the Great Lakes in 2004. Federal law prohibits the use of lead shot for hunting waterfowl, because of its huge toxicity potential. If one of the components of the ordnance would be lead, has consideration been given to lead-free alternatives? If not, why not? We are concerned about the cumulative effect of these quantities of new lead being added to the Great Lakes annually (combined with all the other sources of lead pollution already present in the Lakes), and also about the effects on wildlife as lead is accumulated in the food chain.

We request a full environmental study specific to each Safety Zone which would:

- determine if there are endangered or threatened species present
- determine if there are contaminants already present at the sites that could potentially create harmful chemical interactions when mixed with the ordnance, propellants, or explosives used
- study the accumulative impact of metal discharges on the Great Lakes food chain, from aquatic organisms, to fish populations, and finally to fish-eating birds such as Ospreys and Bald Eagles
- consider the timing of each live fire exercise and determine which migratory birds might be present in the area, and how they would be impacted
- determine if there are breeding birds near the area and how they would be impacted

The Petoskey Regional Audubon Society is dedicated to the stewardship of Michigan's wild places and wildlife, with an emphasis on our local region. We feel that the impact of these live fire exercises must undergo further study, and further public scrutiny, before they should be established.

Thank you for the opportunity to comment.

Sincerely,



Cindy Mom, President
Petoskey Regional Audubon Society