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October 27, 2006

Docket Management Facility  
U.S. Department of Transportation  
400 SW, Room PL-401  
Washington, D.C. 20590-001

Via facsimile and U.S. post

RE: Docket Number USCG -2006-25767 - 403

Dear Commander,

Tip of the Mitt Watershed Council, on behalf of its 2,000 plus members, would like to provide comments on the proposed U.S. Coast Guard Weapons Training Exercises in the Great Lakes.

As a means of introduction, Tip of the Mitt Watershed Council, founded in 1979, is a non-profit organization whose purpose is to protect, restore, and enhance water resources, including inland lakes, rivers, wetlands, groundwater, and the Great Lakes. We base all our programs on sound science and policy analysis, and have garnered respect for our work from local, state, and federal agencies, businesses, fellow environmental organizations, and citizens.

We commend the Coast Guard for extending the public comment period to allow participation from the forty million citizens of the Great Lakes Basin who rely upon the Great Lakes for their economy, drinking water, recreational opportunities, and overall way of life. We appreciate the opportunity to offer comments to ensure activities within the Great Lakes are taken with careful consideration to protect the health of the Great Lakes ecosystem and its users.

While we respect the work of the Coast Guard, the Watershed Council is concerned about the potential impacts that may result from the proposed Coast Guard weapons training in the Great Lakes.

#### **Environmental Considerations:**

The "Preliminary Health Risk Assessment for Proposed U.S. Coast Guard Weapons Training Exercises" prepared by CH2M HILL fails to adequately address the true extent of potential adverse impacts associated with live fire on the Great Lakes.

- The health assessment is only based upon five years. Many of the chemicals that will be introduced into the Great Lakes are able to persist in the lake ecosystem for longer than five years. What are the long-term impacts, beyond five years, of the chemicals and toxins associated with the ammunition utilized in the training exercises?
- The assessment fails to address cumulative impacts or chemical interactions which will inevitably occur within the lake ecosystem. Without evaluation and full understanding of these factors, it is irresponsible to conclude the "proposed training will result in no elevated risks for the Great Lakes."
- The assessment fails to address site specific analyses for the 34 proposed locations within the Great Lakes. Site-specific factors such as sensitive or special habitats, threatened or endangered species, existing contamination, and potable water intakes need to be considered to determine the true risk associated with training exercises for each proposed site.
- The assessment failed to include the chemicals associated with the tracer rounds. A common component of tracer ammunition is white phosphorus. According to the Agency for Toxic Substances and Disease Registry (ATSDR), "in water with low oxygen, white phosphorus may react with water to form a compound called phosphine. Phosphine is a highly toxic gas..." Additionally, "in deeper soil and bottom deposits of rivers and lakes where there is no oxygen, white phosphorus may remain for several thousand years." Given these factors, it would seem that such a chemical should absolutely be considered in a risk assessment. Additionally, white phosphorus is used in the production of chemicals for fertilizer. The Watershed Council is currently working on a statewide initiative to ban or limit the use of phosphorus in fertilizer to protect water resources from nutrient loading and, therefore, cannot support a proposal which runs counter to our goal to reduce the overall level of phosphorus in the Great Lakes.

In order to address the inadequacies of the "Preliminary Health Risk Assessment for Proposed U.S. Coast Guard Weapons Training Exercises", the Watershed Council recommends a full Environmental Impact Assessment.

Additionally, the "Preliminary Health Risk Assessment for Proposed U.S. Coast Guard Weapons Training Exercises" outlines the ammunition characteristics associated with the training exercises. Based upon those characteristics, approximately 7,000 pounds of lead will be discharged into the Great Lakes annually. According to the 2004 EPA Toxics Release Inventory, approximately 4,000 pounds of lead are emitted to surface waters annually in the entire state of Michigan. This proposal will virtually double the amount of lead discharged to the Great Lakes by the state of Michigan.

Given the excessive discharge of metals, including carcinogens and neurotoxins, associated with the proposed weapons training on the Great Lakes, the Watershed Council recommends exploring alternatives to ammunition that will not result in significant increased pollution to our waters.

Furthermore, the Watershed Council is concerned about the selection of the 34 sites located within the Great Lakes Basin. The "Preliminary Health Risk Assessment for Proposed U.S. Coast Guard Weapons Training Exercises" indicates the "highest intensity of training will occur at Great Lake Stations." While we support measures to ensure our nation's security, we have been provided with no justification for the need to have 34 sites designated for weapons training within the Great Lakes. Can the goal of the training exercises be accomplished with simulation exercises on land or a reduction in the number of sites, thereby minimizing the potential adverse impacts to our water resources?

#### **Recreational and Commercial considerations:**

The Watershed Council is dedicated to working in partnerships with the various stakeholders to ensure the protection of our water resources. One stakeholder group we work closely with is recreational boaters. Therefore, we also feel it is important to recognize that as a first-class boating mecca, the Great Lakes offer much more than exquisite boating opportunities, they also offer economic stability and growth for the region. The Great Lakes states are home to 4.3 million recreational boats which account for nearly one-third of all registered boats in the United States. Six of America's top 10 states for registered boaters border the Great Lakes – Michigan, Minnesota, Wisconsin, New York, Ohio, and Illinois. Additionally, an estimated 2 million recreational boats are in Ontario and Quebec. As well as the millions of privately owned recreational boats on our waters, there are also approximately 300 excursion vessels, ferries, and dinner boats operating in the Great Lakes. This impressive fleet of boaters in the Great Lakes is a significant contributor to our economy generating \$19 billion in sales annually and supporting 246,117 jobs for the region.

Given the economic and recreational importance of boating in the Great Lakes and that the boating season in the Midwest is significantly shorter than in other coastal areas, the Watershed Council recommends the Coast Guard conduct weapon trainings during the off seasons to avoid unnecessary threats to public safety. Therefore, weapon exercises in the Great Lakes should not be conducted during our boating season which runs from April through October.

#### **Regional Considerations:**

The Great Lakes are an international treasure. The Lakes and their connecting channels contain nearly 20 percent of the world's surface freshwater and 95 percent of the U.S. fresh surface water supplying 27 million people with drinking water. In addition to providing vital habitat to a multitude of fish and wildlife species, these magnificent natural resources and the surrounding land are home to 34 million U.S. and Canadian residents.

We encourage the Coast Guard to work in coordination with all stakeholders including the Canadian provinces of Ontario and Quebec, Great Lakes Tribes and First Nations, state agencies and non-governmental organizations dedicated to the protection of our Great Lakes.

The health of the Great Lakes is at a critical juncture. Last December, a report endorsed by 60 of the top scientists from around the Great Lakes Basin was released. The report stresses that the Great Lakes presently are exhibiting symptoms of extreme stress from a combination of sources that include toxic contaminants, invasive species, nutrient loading, shoreline and upland land use changes, and hydrologic modifications. In large areas of the lakes, historical sources of stress have combined with new ones to reach a tipping point, the point at which ecosystem-level changes occur rapidly and unexpectedly, confounding the traditional relationships between sources of stress and the expected ecosystem response. There is compelling evidence that in many parts of the Great Lakes we are at or beyond this tipping point.

With every new stress, the Great Lakes system may experience further – and potentially irreversible – damage. It is our responsibility and duty to make sure that every action taken is done with great care to protect these treasured waters. We urge the Coast Guard to give careful consideration to the comments provided and suggest modifying the proposal to minimize adverse impacts to obtain a solution that benefits both those who treasure our water resources and the water resources themselves.

Thank you again for the opportunity to comment. Please feel free contact me with questions or concerns regarding the comments provided.

Sincerely,



Jennifer McKay  
Policy Specialist

cc: United States Representative Bart Stupak  
United States Senator Carl Levin  
United States Senator Debbie Stabenow  
Ms. Dana Debel, Governor's Office  
Commander John E. Crowley, Jr., Ninth District Coast Guard District