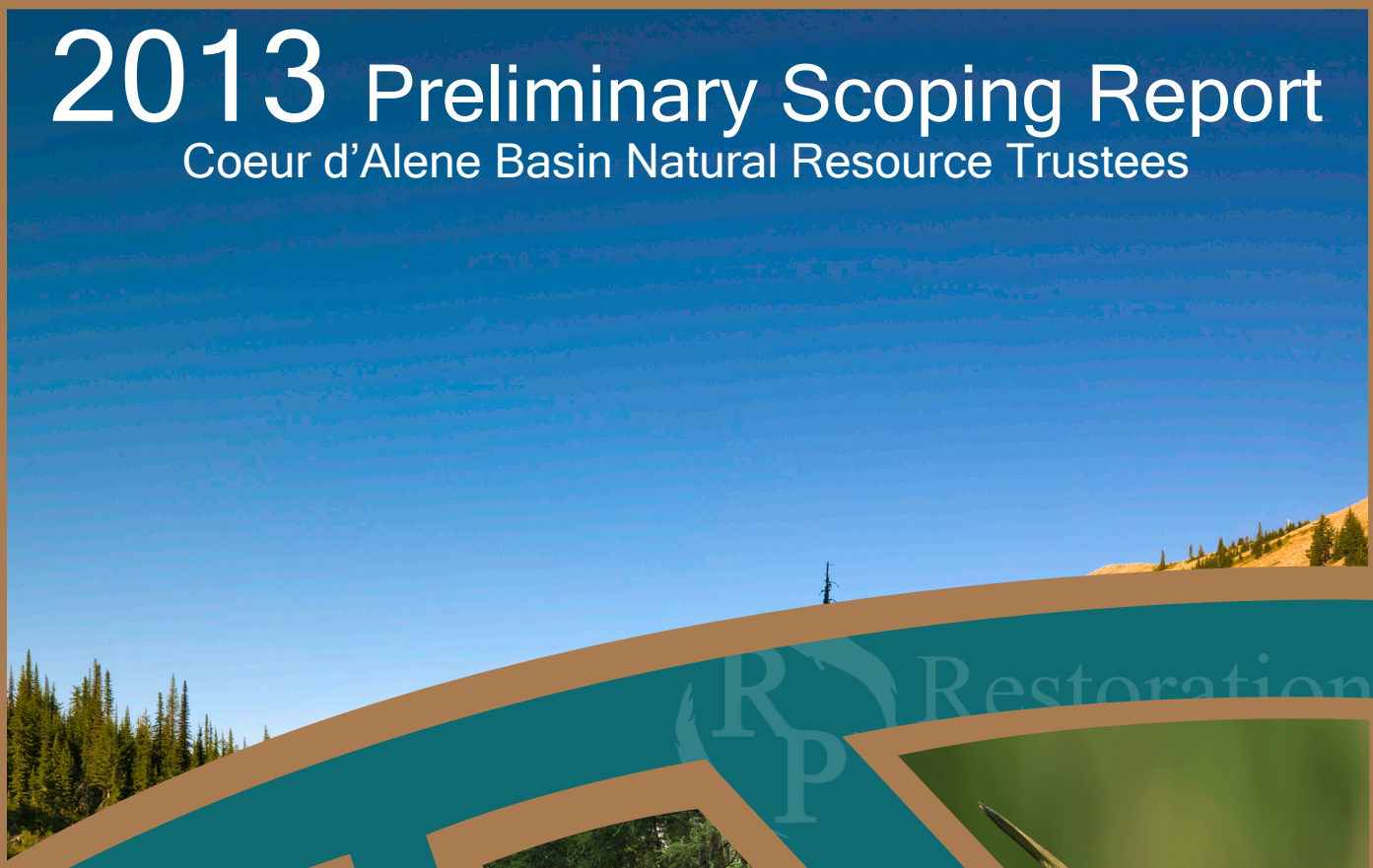
2013 Preliminary Scoping Report

Coeur d'Alene Basin Natural Resource Trustees



The Coeur d'Alene Basin Natural Resource Trustees conducted a public scoping period from June 13, 2013 to August 27, 2013. The 229 comments received will be individually analyzed to determine whether they meet the purpose and need of restoring injured natural resources in the Coeur d'Alene Basin. This report contains a summary of the scoping activities conducted by the Trustees as well as a detail of the comments received.

Restoration Partnership

Photo Courtesy of Pat Clayton

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Restoration Partnership

The Restoration Partnership (Partnership) was developed by the Coeur d'Alene Basin Natural Resource Trustees to introduce the Trustees as a newly formed, unique collaboration whose primary mission is to return our natural resources to a healthy condition by developing and implementing a restoration plan for the Coeur d'Alene Basin. We engage the public by providing ways to help shape the plan, propose specific restoration projects, and partner with us on project work.

The Trustees-and their representative agencies-are the U.S. Department of Interior (DOI), represented by the Fish and Wildlife Service (FWS) and Bureau of Land Management (BLM); the Coeur d'Alene Tribe (Tribe); the U.S. Department of Agriculture (USDA), represented by the Forest Service (FS); and the State of Idaho, represented by the Idaho Department of Fish and Game (IDFG) and Idaho Department of Environmental Quality (DEQ).

The Partnership includes both the Trustee Council and the Restoration Team. The Trustee Council consists of one representative from each of the Trustees: DOI, Tribe, USDA, and State of Idaho. The Trustee Council provides oversight and guidance while the Restoration Team provides technical expertise. There is a hierarchical relationship that exists between the Trustee Council and the Restoration Team.

Throughout this document, the terms *Restoration Partnership* and *Coeur d'Alene Basin Natural Resource Trustees* are interchangeable and can be considered the same.

Introduction

In the summer of 2013, the Coeur d'Alene Basin Natural Resource Trustees, through the Restoration Partnership, conducted a public scoping period. The intention of scoping was to solicit input from the public regarding the development of a restoration plan for the Coeur d'Alene Basin. The scoping period was held from June 13, 2013 to August 27, 2013.

This report is a preliminary report, NOT THE OFFICIAL SCOPING REPORT. The *Official Scoping Report* will be released along with the draft environmental impact statement/restoration plan (EIS/RP). As such, this report is a brief summary of the scoping period along with the exact comments received. The comments are being provided to the public so they may see the breadth and scope of public comments that will be evaluated and considered during the Partnership's continuing process to develop a RP.

Background

In the late 1800s precious metals were discovered in the Silver Valley. The ensuing mining boom would result in this area being the largest producer of silver in the world. The incoming prospectors and families would also create a strong economic and cultural base for the region. Unfortunately mine waste disposal practices were underdeveloped for much of this time and for nearly a century much of the waste, heavily laden with lead, zinc, and other contaminants, were deposited directly into the waterways. The negative effects of these practices were immediately seen upon animals and crops downstream, and would increase over the next century.

In 1991, a natural resource damage claim was filed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) that sought damages from the parties responsible for the release of mine-waste contamination. Litigation would last for the next 20 years.

In 2011, with the last of the major settlements in hand, the Trustees, through the Partnership, agreed to develop and implement a restoration plan (RP) for the Coeur d'Alene Basin. They also chose to follow the National Environmental Policy Act (NEPA) guidelines for the planning process and, subsequently, to conduct an Environmental Impact Statement (EIS).

NEPA requires the lead agency to publish a Notice of Intent (NOI) to conduct an EIS and to initiate the scoping process. The FWS, BLM, FS, Tribe, DEQ, and IDFG, as joint lead agencies, have determined that an EIS is necessary for the project. As a result, they issued a NOI to publish an EIS in the Federal Register on June 13, 2013 (78 Federal Register 35602-03).

Scoping

NEPA regulations require the lead agency/agencies to solicit information from the public through a scoping process. For the Coeur d'Alene Basin restoration plan, the Partnership developed and executed a comprehensive strategy to solicit this input during the scoping phase. This effort included activities in pre-scoping, internal scoping, public meetings, group presentations, press releases, newspaper articles, open house advertisements, an interactive website, print publications, mail, and email.

The NOI was published in the Federal Register on June 13, 2013 and was initially intended to be a 60-day process which would end on August 12, 2013. However, there was an increase of interest and comments received toward the end of this 60-day period. As a result, the Partnership extended the scoping period an additional 15 days to end on August 27, 2013.

The purpose of scoping is to solicit input on the issues and impacts that will be addressed in a NEPA document as well as determine the degree to which those issues and impacts will be analyzed. The intent is to focus the analysis on significant issues and reasonable alternatives, to eliminate extraneous discussion, and to reduce the length of the EIS.

Scoping also allows the Partnership to collect information about what is important to the public. This information (e.g., priority resources, geographic areas, etc.) will inform the Partnership as it develops the restoration plan.

Comments Received

During scoping, the Partnership received 229 distinct comments from just over 100 individuals. In the coming months, each comment will be analyzed relevant to the purpose and need of the proposed action (to adopt and implement a restoration plan).

The purpose of the proposed action is restoration of the injured natural resources and lost services in the Basin. This action is needed because, as discussed above, natural resources in the Basin have been injured due to the release of mining related hazardous substances.

Under CERCLA, damages recovered from parties responsible for natural resource injuries are used by the trustees "to restore, rehabilitate, replace, and/or acquire the equivalent of the injured resources" [42 U.S.C. § 9607(f)(1)]. Restoration activities implemented by the trustees are typically subject to the requirements of the National Environmental Policy Act (NEPA) [42 U.S.C.§ 4321]. Information on how each comment is utilized will be released in the *Official Scoping Report* along with the draft EIS/RP.

In the comments below, all information identifying individual persons has been removed. In addition, some commenters provided supplementary information in the form of attachments. Due to the size of these attachments, they have not been included in this report, but they have been made available on the Restoration Partnership website at www.restorationpartnership.org/publications.html.

Comment #	Comment
1	Hello, I am the new Area Water Educator for University of Idaho Northern District Extension, filling the role previously held by [redacted]. Please consider me and my office a resource for developing outreach and educational programming and materials. As an example please refer to the IdaH2O Master Water Stewards Program.
2	when you send out emails, please send them BCC.
3	I use the bike trails, hike and swim in the North Fork. It would be nice to have the water cleaned up. Just be quick and as cost effective as possible on these projects.
4	Consideration should be given to putting a low-head dam on the CDA River between Kellogg and Smelterville. Please see Silver Lake Recreation Area attachment . And don't forget Gene Day Pond. **[Attachment A; 145 KB]**
5	The Gene Day "fishing" pond project could use some help. Fish and Game is moving forward with limited funds to drudge and stock the pond. Vegetation and wildlife enhancement would be welcomed. DEQ funded the sampling event, but couldn't aid any more with funding. Can the Restoration Partnership help?
6	I only received one-day's notice of the Open House. I want jobs created. Will this happen once the plan is written?
7	Canyon Creek has more potential for restoration to return a fishery. I would not focus on Ninemile Creek.
8	Focus on Beaver Creek restoration in the NFK CDA Subbasin. There have been mining impacts but no funding has been available since it is outside the Superfund boundary.
9	Something needs to be done about the Ray Carlisle site in order to prevent catastrophic failure.
10	Funding should be preserved for the lower basin.
11	Unless EPA addresses the recontamination potential in the lower basin, I wouldn't spend a lot of time doing work down there.
12	On the Riparian Condition map it states that roads are a stressor to wildlife. However, I have lived in the silver valley for 40 years and the moose, dear, and bears are sighted on my road all the time.
13	Along the lower CDA River the #1 issue are boats. No more boats should be allowed in order to prevent excessive erosion along the riverbanks. Restore highly erodible areas and create recreation areas that are not susceptible to erosion.
14	Sorry I could not make the meeting in Kellogg. I do have some suggestions for the program. I would like to see the banks along Riverview Drive in Kingston stabilized. This is below the confluence where the South Fork runs into the North Fork of the CDA River. The banks are very badly under mined in spots and this area is used constantly by fisherman all year round and by swimmers and floaters in the summer. I think it is worth looking into. Thanks for your time and all you are doing for our area. [redacted]
15	I think the govt needs to be involved on this and do not understand who "restoration partnership" is. I also think the public wants the financial workout here on how much damage money is going into this project and how much national taxpayers will be taxed for these projects. The fact is no area should allow these miners to come in and just destroy without them putting aside money to fix everything that they hurt. IT'S TIME TO STOP MINERS FROM DESTROYING AMERICA AND GETTING AWAY WITH MONEY FOR THEMSELVES AND LEAVING DESTRUCTION FOR EVERYBODY ELSE. THIS COMMENT IS FOR

	THE PUBLIC RECORD. PLEASE ACKNOWLEDGE RECEIPT. [redacted]
16	When doing restoration, when possible you should start upstream.
17	If you are going to do any work out at Cataldo Flats you should amend the soil first.
18	Avista Utilities has transmission right of way corridors within the restoration boundaries. We are requesting contact prior to any projects occurring within 100' of our transmission lines. All tree plantings on or near transmission rights of way should be of species that mature less than 15'. Avista uses Integrated Vegetation Management strategies including mechanical, manual, chemical, biological and cultural methods, tools and techniques to manage vegetation on transmission rights of ways. Restoration plans should consider transmission right of way when planning and implementing all projects that may affect Avista Utilities electric line rights of ways on both private and public lands.
19	I hope that one of the plan's priorities is the extensive monitoring of water quality and aquatic organisms-both fish and invertebrates-to evaluate the success of the restoration projects.
20	Please! Please! Please! Stop the pumping of bovine fecal matter into Black Lake. We have tried many ways over a period of 15 years and have not yet been successful. We have done water sampling and seen soaring phosphorus levels during wet years. DEQ has the records. Everyone is familiar with the problem but no one seems to have an answer.
21	Education and community outreach programming will likely be important, including: 1) Presentations and discussions with community organizations, 2) K-12 in-class guest lectures, 3) Summer Camp, 4-H, and after school programs, 4) development of higher-ed internships and apprenticeships, and 5) Integration into natural resources and environmental science type programs.
22	Also, I am a social researcher and am in a Ph. D. program in Conservation Social Sciences. I can also lead and/or assist with research projects in the area of attitudes and understandings of restoration, as well as efficacy of restoration.
23	A research proposal toward stabilizing sandy deposits on the CDA River flood areas. Step 1: Basic Tests of a Project Area a) Soil tests - NPK+pH, organic matter b) Heavy Metals c) Various polyacrylamides and other available sources of organic matter d) Trees, shrubs, and grasses that could hold soil e) Different matting materials which would hold plants in sandy material f) Evaluate the effects of flooding various treatments Step 2: Analyze and Expand to Bigger Area. [redacted] For information about projects completed by us see: Report to the NAS (Jeri DeLange and BEIPC office in Kellogg)
24	I vote for decontaminated fish that is safe to eat.
25	I have lived in the Coeur d'Alene Basin my entire life. It is sad to see the neglect of this issue publicly. There is very little knowledge among the public or little care to do anything. My family spends much of its recreation time in this area. We swim and fish in Coeur d'Alene lake/river and the St. Joe River. We also float both rivers and their tributaries. We camp every year up Big Creek. We also do a lot of hiking and biking. Much of our time biking is spend on the Trail of the Coeur d'Alenes, mostly from Plummer to Harrison. However, we have made a few trips up to Mullan and back. The stretch along the Coeur d'Alene River, especially around Cataldo is our favorite. My family comes from an old farming heritage (which has its share of responsibility). Restoration is important in several ways. It protects the aesthetics. No algae blooms. No dead animals or plants. Etc. It also protects our own health, both from contact and from consumption (fish/game). Though visiting an area may not result in any consequence, long term exposure can have detrimental effects (as already been shown). If we were not to restore it, it could degrade our environment, and this area is

	one of the most beautiful. Of course, I would like to see it all done, though I understand that there are limited funds and time available. I think safety is the number one priority (maybe that is the focus of the EPA more than the partnership?). Whatever poses a risk for contamination or sickness (human or animal) should be dealt with first. I think that the most devastated areas, that can be restored or there is a direct benefit/result from restoration, should be prioritized.
26	Also areas with high risk to visitors should be dealt with, especially those which are popular recreation areas.
27	I feel that the most workable plan to start with on rehabilitating the basin, besides the type of mitigation that has already been put in motion, would to be enhanced the wildlife zones. Primary focus being put to the rehabilitation of ALL damaged streams in the CdA River watershed. The fishery is a primary value and has been damaged by stream degradation over the years by logging, farming and mining. Much of the remediation that is needed in the Basin is virtually impossible to accomplish. Let's fix what we can, creeks and unpolluted wetlands. Restore creek flow with riparian vegetation and stream bed work to slow down the water flow, to decrease bed load and increase spawning habitat. All creatures benefit from these things. Thanks, [redacted]
28	I would like to see projects going back to a Savanna, where big trees planted smaller ones down to berries and so forth to the ground so that it produces with no tillage. And no weed problems as everything is in a balance!
29	Hi, I'm [redacted] and I have some lands, wetlands along the St. Joe River, 3 miles northwest of St. Maries, Idaho. It is 110 acres, has waterfowl and wildlife. It is within 60 yards-100 yards of the St. Joe River. It has 2 ponds and potential for larger lake since we have a pump to pump out water from ditches to river. It has deer, elk, ducks, geese, herons, etc. This land could qualify for wetlands, wetland preservation, wildlife pres. Salmon and mine mitigation. It has many trees.
30	I think with limited $, it is good to clean up the St. Joe and have an area that is finished rather than work somewhere but can't finish it. I use hiking trails and love that the wildlife are protected and prefer a wildlife restoration focus.
31	St. Joe area prefer and restore wildlife.
32	I am in favor of the creek and lake restoration. When they do these projects they usually restrict the area so that you are unable to use it for other recreations. I detest locked gates in public land and forests! I don't necessarily dislike not being able to not take a vehicle, but should be able to walk in! Should be more marsh and wetlands put back to natural eco systems.
33	Everyone should have a wetland on their property to infiltrate and treat nutrients. "Bring back the wetlands and get on the wetland restoration kick." 1 acre of cattails = 3acres of wheat. Education is key!
34	We support restoration of fish, streams, and riparian areas but don't take away roads and access in order to do the restoration.
35	We support fishing, hunting, and recreational sites-the "for people" projects.
36	Please consider an educational effort as part of your plan. Natural resource conservation education in elementary and middle schools would be a particularly good investment. Teach respect for the resources but do not vilify mining.
37	We ask that you not support UN Agenda 21.
38	I wish to comment as follows: All approved projects should have a long term natural resource long term monitoring program associated with them. Long term would be for a

	minimum of 25 years or longer depending on the goals of the particular project. A long term, public agency (USFS, State, Tribal) monitoring coordinator should be funded by the damage assessment funds. This person would then supervise and coordinate design, implementation, and all subsequent monitoring activities on a year round basis as the positions primary responsibility, not as a collateral duty. The field work would be carried out through various colleges and universities programs using students/profs from various sciences as determined by the design of the monitoring system. The RM coordinator would be responsible to set up coop and MOU agreements with various educational institutions. Such a management organization assures great benefit/cost ratios for use of funds plus helps assure that the monitoring activities will be coordinated and conducted on a yearly, long term basis. Without such long term natural resource monitoring it is impossible to show the results of the restoration efforts on a quantitative basis. Without this data the project will be unable to show the court that the damage assessments funds were properly used and not wasted on experiments. Just spending money on various projects is a "old school" mistake and will not help future projects.
39	Public access to various lands and associated projects should be a key screen out element for project approval. As example, an early project in the Medimont area allowed for purchase of private property, wetlands restoration, and management oversight by Ducks Unlimited. The problem is that there no allowance for public access to these lands. There is not even a sign, other than "private lands- no trespassing" on the property. I live in the Harrison area and many of my neighbors have complained they can't even pull off to look at the increased bird life and improved habitat. Because many of the affected resources are "public resources" severely damaged and causing a major health hazard, the public should be aware and allowed to not only participate in the resource management planning portion of the project but allowed to visit some of the projects to view the improvement made to the ecosystems. Again, a major screen out or selection criteria is the ability of the public to use and visit these projects. Without these, such projects benefit a handful of private landowners. So along with purchase of private lands in fee, should be the allowance for a public non-profit land trust such as the Trust for Public Lands to take title to these lands to all assume liability and also allow for public use, which can include hunting. Also damage assessment funds should/could be used to purchase easements onto private lands for specific uses without a change of ownership.
40	I work with the NRCS office in Coeur d'Alene, and value that building a working relationship could improve several needed projects in the area. Most importantly, the Wapiti Elk Ranch located on Highway 95.
41	Having additional funds to help with the restoration of Bell Grove Creek, will not only help in improving water quality, but will continue to improve Lake Coeur d'Alene as well.
42	Other projects that could benefit is the possibility of improving any wildlife habitat along the Coeur d'Alene River and surrounding tributaries. Personally, fishing and hunting are a big hobby of mine, and to improve the rivers and lakes, would be great for future harvesting of fish.
43	Forest improvements including thinning is needed in a lot of areas in Northern Idaho, and having some funds to help landowners reduce costs, could also increase the habitat for Big Game animals.
44	Please utilize the Benewah Soil and Water Conservation District to work with private landowners.
45	We like the idea of cost sharing programs that allow you to stretch your money and to

	compliment, rather than duplicate, the work that is already being done.
46	We think dredging the lake is a bad idea.
47	I hear you are looking for locations of restoration. BPA Project 2001-032 recently purchased 6 properties on Hangman Creek that basically gives us access to exactly where we want to start restoration. We also have access to tribal lands and allotments down to HWY 95. We are now in good shape because all assessments and prioritization studies are complete and a pilot project on Sheep Creek was initiated last year to test methods of using beaver to restore the stream and riparian area. We are currently working on a design to force flood waters onto the floodplain and into old relic channels we will reconstruct.
48	There is a lot of restoration work that could be done within the Coeur d'Alene Reservation in the Hangman Creek watershed. Erosion rates in the agricultural lands are shockingly high. The sediment contributed to the Spokane River "Over many years, the sediment has been filling the reservoir behind Nine Mile Dam and is beginning to clog the popular Long Lake below the dam. Field erosion is the prime source for suspended sediments coming out of Hangman Creek. Projects that would reduce the erosion include fencing off streams from livestock; using alternatives to watering livestock in streams and planting strips of native vegetation to buffer and slow sediment runoff." Spokesman Review, Thursday, November 28, 2002. In my opinion, no till zones along streams that are identified as important in erosion prevention and vegetated buffers through crop fields (possibly with camas and native bunchgrasses with zones for equipment crossing) would significantly improve water quality and reduce soil loss on the Reservation.
49	Care must be taken to avoid creating risk associated with restoration projects. Improving access to contaminated areas that deal with water quality improvements must consider what is being left behind. If lead is present, steps must be taken to reduce or eliminate exposure to users, especially young children.
50	Staff at the Kellogg office of Panhandle Health District (PHD) is available to assist with any public health issues or concerns you may have. Please keep us in the loop… I would strongly recommend that all work planned and initiated be coordinated with the Institutional Controls Program (ICP) operated by the PHD. While these projects will not be required to obtain ICP permits, they will be conducted near property that falls within the ICP Administrative Area and under the rules that require contaminant management. ICP licenses and maintains a list of over 400 individuals or companies approved to do business that involves construction, excavation, or grading within the Superfund site. We are available for pre-bid meetings and during construction projects to help coordinate your work with ICP requirements on adjacent lands. We [PHD] are also available for plan reviews so ICP issues can be coordinated with all projects prior to beginning work. As-builts for all projects that result in protective barriers being installed should be provided to the ICP for inclusion in the ICP tracking system. This system is available to assist the public, lenders, potential purchasers and land managers with regard to the existence and maintenance of all barriers installed.
51	Coordinating projects planned by the Restoration Partnership should be well coordinated with work planned/underway by the Coeur d'Alene Trust. Effective planning can leverage projects for better joint outcomes and help realize cost savings to both entities. It can also prevent projects that have been completed by either entity from having to be modified at a later date to accommodate a new or different project in the same area.
52	Restoration projects throughout the Basin area must be well planned to avoid damage by flooding. Projects not capable of withstanding the forces of a 100 year flood will not be

	successful long-term. While we focus on the 100-year flood, it is important to keep in mind that larger floods are on the horizon and can occur at anytime. The effects on restoration projects from a 250-year flood or larger should be considered. If all the work to be done in this area is to simply be washed away in a 100+ year event, it all begins again. The money won't be there for a second effort.
53	We have property at [redacted] which we use about 9 months a year for camping and hunting. Sediment in the Beaver Creek has widened and moved the creek and the water is very shallow-no fish. Bank erosion is a major problem. Willow plantings all went down the creek. Moose, elk, deer are frequent visitors and often bed down for the night. Restoring Beaver Creek will improve fish and wildlife habitat as well as stop our property from further erosion.
54	Times are extremely tough for small construction contractors in our area and bonding is getting harder to get. Keeping project values down will allow more local companies to be involved.
55	As a contractor who is interested in participating in the restoration, I have the highest hopes that you receive all the support you need for this program to be successful.
56	Hello. I am a landowner and homeowner in the Bull Run Lake area of "the Box". We have land abutting Bull Run Lake. It has come to my attention that input for restoration is being sought for investment into habitat restoration, habitat recovery, and habitat improvement. Please consider: that Bull Run Lake, as one of the few "chain of lakes" in the mid to upper Coeur d'Alene River area below Rose Lake, and above Harrison, has unique opportunity for habitat enhancement. About 10-20 years ago, the Idaho Fish and Game funded a lake-level stabilization program that raised the lake level several feet, but left it still a few feet lower than optimum. the very shallow shorelines, the shallow lakebed, allows dollar pads and yellow water lilies, along with some other pond growth, to choke out sunlight and cause black slime and organic buildup in the lake shallows. Fish survival is challenged by lowered oxygen due to the organic buildup. what can otherwise be a good recreational lake, with less tailings affect than those lower lakes with direct CDA river connections, is thus restrained from better, deeper, and more useable deeper water habitat. To accomplish an increased depth along the shorelines, to raise the water depth 2-3 feet, would be a remarkable improvement, while maintaining the waterfowl habitat in the shallow upper reaches of the lake. All that is needed is a raised dike/access road along the western edge of the lake, and an elbow or so on the culverts to keep the lake from overtopping the raised dike. There is an optimum level at which the existing shorelines can be stabilized, and also the submerged historic tails can be even more kept in anoxic condition, while fish life and waterfowl can benefit. Of course, this will also improve spawning areas for game fish, and may even allow trout to survive in the deeper areas where water temperatures in the sixties can be expected where water is over 8 feet deep. Local lake shore residents can be protected if the right height is maintained. Thank you for this consideration. [redacted] lake shore landowner on Bull Run Lake.
57	Dear Kajsa, Recently, I attended the June "Open House" meeting in regards to the Coeur d'Alene Restoration Partnership at the Coeur d'Alene Inn. I took it upon myself to eyeball and read each section and various departments thoughts, ideas, etc. I was glad I attended. I am pleased that the various federal and state departments were so open to just chat and expound on the thought that we have some money, what do you want to do with it? I had a chance to visit with you and you offered me you card to correspond if I felt led to and I do. Thank you for the opportunity.

58	I would simply like to ask that if federal and state restoration groups are to join forces, where is the mining industries representation? Or, since that was the problem, do we just eliminate that whole fraction? I really feel they have a lot to contribute and need to be heard. They also represent a huge economic area of impact for the entire Coeur d'Alene's. Also, there are a lot of smaller mining interests in this same area. Please don't just walk over them. They need to be notified some way and involved. Since you are spending $140 million in fines from them, don't they at least have the right to set at a group table and contribute something besides money? Just a thought.
59	Also, as to restoration in the greater basin area, I must speak about the lack of concern on the East Fork of Eagle Creek. Also portions of the West Fork too. I cannot understand why any branch of the federal or state governments has the right to take away the use of such a beautiful drainage with the excuse that they didn't have the money to repair the road when it flooded. Let's simply look at the big picture: People camped, fished, hunted, prospected, gathered huckleberries, black caps, stones for yards, gathered Christmas trees and firewood and in general had fun with family and friends. Answer me a real question: Isn't that what it's all about? Maybe the public is not included in this equation and that's the whole idea. The original public trail was barely a trail that turned into a road in the mid 1880"s for miners and settlers to use from the Great Northern Railroad in Montana to hike or pull a toboggan over the pass. In fact, that is why there is a Toboggan Creek that drains into the East Fork (named after those settlers). I would emphasize that he public feels controlled on this issue. Why not just bite the bullet and fix the darn road? The public would be happy and all phases of government could manage it in a way that the public wouldn't feel controlled?
60	In closing, I feel it is important to mention our State of Idaho flag and motto: "Esto Perpetua" which means "it is forever." If we do not live up to the four meanings on the Idaho State flag which is mining, timber, farming, and wildlife, we have all failed and you will have to replace the man on the flag with the miners pick with one with a floaty tube and a fishing pole. Let’s keep things the way they have been for a long time with a four part degree of sensible balance. I have more to say but I'll save it for another session. Thank you for your listening ear. Please save this memo as one of the "input comments" for consideration. I have never commented so I'm not sure of the formalities.
61	After attending your public meetings and reviewing your web site, I felt a need to comment on the direction that the Restoration Partnership is moving. My main concern is the time and money that is being invested into an EIS that will provide no site specific analysis of projects. Instead, I support a planning document that identifies areas that have been impacted by past mining, timber harvest or recreation that requires remediation or restoration. You could then propose specific projects for those areas that could trend them back to a "restored condition." That would save the money, time and effort that an EIS requires. An environmental analysis could be implemented on those site-specific proposals (see attached) **[see comment 227 for attachment].**
62	Also, I recommend that a cost benefit be done for each site-specific proposal.
63	The trustees should have a clear vision of their goals in the basin.
64	You indicate that wetlands, streams and rivers be brought back to a natural state; I agree with that proposal. This in itself will encourage the abundance of specific native species.
65	It is important to find good reference areas to obtain a clear vision of what the area will look like, and to anticipate the type of aquatic production that might result. A large data set is necessary to understand the variability in stream types and aquatic production. I have

	included a proposal that could help collect this type of data (see attached) **[See Comment 71 for attachment].**
66	I am opposed to the creation of habitat in contaminated areas. This will likely attract birds, wildlife or aquatic species that may used polluted areas adjacent to the clean sites.
67	The Restoration Partnership should focus on restoration, not remediation. I recommend that the EPA do the remediation. This coordinated effort will save money and reduce impacts to both the land and biota.
68	It is important that all the systems be restored. For example, highly degraded water quality and fish habitat continue to exist in the main stem of the South Fork Coeur d'Alene River. When habitat and fish production are improved in the tributaries, these fish migrate into the degraded South Fork; they are likely to die from metals, or lack the habitat in order to mature. I recommend focusing on the North Fork of the Coeur d'Alene River, the St. Joe River, and tributaries to Lake Coeur d'Alene before improving tributaries in the South Fork.
69	Finally, in areas where good habitat exists but non native species are present, projects that remove the non native species should be implemented. Examples of these areas are Cougar Creek, and Steamboat Creek in the lower Coeur d'Alene River. One may need to spend some time and money to evaluate species occurrence in these tributaries. If non natives species occur in degraded habitats, these areas should have a lower priority for restoration.
70	I have over 30 years of experience in the North Fork of the Coeur d'Alene and St. Joe Rivers and tributaries to Lake Coeur d'Alene. I would like to offer my expertise in the restoration efforts in these basins.
71	Stream size *I used drainage acres here because I thought that would be the best way to query the data, i.e. we cannot look at stream width in a stream layer. Regional curves, base on existing gauge data to predict Bank full widths (Bfw) are based on drainage size (sq miles). The numbers associated with the acres were taken from the developed curves. Small-Range 300 (Bfw 1 meter) to 5,000 acres* (Bfw 5meters) Medium - Range 5001 (Bfw 5 meters) to 13,000 acres (Bfw 10 meters) . Large - All streams above 13,001 acres (Bfw 10 meters) Project Types Woody debris - This work would involve the placement of Large woody debris and the construction of pool forming structures in all sizes of streams (examples of this work would be Big Hank creek, Hamilton creek, Yellowdog creek). We should only be looking at main stem reaches in all stream types. This could be from 1- 3+ miles of stream in small streams, 3-6+ in medium streams. In large streams it will be all miles up to the medium stream breaks. Channel Reconfiguration-This work would involve the design and construction of a new stream channel, where the pattern, profile and dimension would be reconfigured. This work would only take place in medium and large stream types. Streams where channel reconfiguration could occur: Trail creek (Confluence with Tepee for about 3 miles going upstream) Tepee below Trail (approximately 2 miles confluence with Trail going downstream) Upper Little North fork (4 miles, confluence with Burnt Cabin upstream up to Honey creek) Iron creek (2 miles mouth upstream two miles, exclude private land) Burnt cabin creek (2 miles, mouth upstream) Cascade creek , Little North Fork drainage (2 miles, mouth upstream) Shoshone creek (8 miles, mouth upsteam 11 miles, only segments within the 11 miles would be treated, some of the lower ends of tributary streams would be treated , i.e. Falls creek, Rampike creek, Clinton creek) East Fork of Eagle creek (6 miles, mouth upstream 6 miles) Road Relocation/Sediment reduction-This work would involve two types of projects. The first is the removal of culverts and road segments on land types which have high erosion hazards, high sediment delivery or landslide potential. This work would occur on hillslope roads in 1st, 2nd and 3rd order

	watersheds. We should query all roads that are not open green roads and that are not encroaching on a stream. These roads are contouring roads within the basin. This query can be a total mile of roads for the entire basin. The second type of project are roads that are encroaching on the streams where we will be removing the road and relocating access. We should tally all stream miles with encroaching roads. The encroaching road should also be tallied in the woody debris or it will be assumed wood will be placed during road relocation. Main Stem Banks - This would be the use of bio engineering or rock/log barbs to stabilize bans or create scour pools in medium and large streams. Tally all steam miles that have encroaching roads or valley bottom roads. Main stem side channels-This would reconnect side channels cutoff by encroaching roads in the main river (North Fork CDA) and the Little North Fork or protect existing side channels. Tally river miles from Prichard creek to South Fork in the main river. Tally river miles from Deception creek to the mouth in Little North fork. May treat 10 - 30 sites. Culverts-This would involve the replacement of fish migration barriers with culverts or bridges that pass fish. A list of culvert migration barriers exists for Forest Service and State lands. Non Native species removal-This would remove non-native species (brook trout) from tributaries which have high quality habitat. Data from the Idaho Department of Fish and Game and U.S. Forest Service can provide information on which streams to treat. All these type of projects could be applied to the St Joe and Lake Coeur d'Alene tribs.
72	I don't like to swim in the Lake much because it's so dirty. I realize most of the dirt is from agricultural erosion and not from mining waste, but if the Lake were to be restored to have clean, clear water, that would benefit people, fish, and wildlife.
73	The Trail of the Coeur d' Alene's is a fantastic trail opportunity in North Idaho and in the restoration area. The trail is recognized as one of the best rail-trails in the nation. When the trail was developed, it was paved to lock out the old ore waste that was used as ballast. On the CDA Reservation, the ballast was removed. Please protect this outstanding trail opportunity as a part of this project. Sincerely, [redacted]
74	Restoration means trying to return nature to the 'Balance' that existed before man wrongly asserted eminent domain.
75	It is my belief with past experience working for The Dept. of Nat. Res. That the evident demonstration of realities beheld, though not seen in our present time, can & should be considered an opportunity. Us, as a Nation of courageous men & women need to Step-up and take the initiative that our Forefathers taught us to do & be, not only as a "Living legacy" but a prime example to follow for generations to come. We cannot constitute the little amount of time it took, for a small tangible gain as for the infinite time and expense it will take to restore a land once held sacred. Now devastated, we cannot comprehend the magnitude of destruction that has lain waste our once "Living Waters" to our now, "Man-made Plague," our "Death Waters of Sorrow." My conclusion is, we, Coeur d'Alene, cannot justify our past generations mistakes but by Grace and only by Grace, through much effort and cooperation from the surrounding people can Restore, that is to Reset a land broken, to a land living. On behalf of the Coeur d' Alene Reservation Sincerely [redacted]
76	Because we live here! If we had realized or thought about our area in terms of 5 generations (like the Coeur d' Alene Tribe) we would not be in this situation. I am just hoping it doesn't take another 5 generations to repair the damage. Thank you for your efforts
77	As a retired USFS employee I can say without hesitation and with complete confidence that

	commercial timber sales restore nothing but the timber purchaser's bottom financial line.
78	A permanent solution to the heavy metal contamination in the Coeur d'Alene Basin needs to be achieved. These heavy metals pose a very real threat to ecological integrity and human health in the region. The removal or neutralization of these heavy metals seem to be the only long term solution to this threat.
79	In the event that a permanent solution cannot be achieved, restoration of other areas within the basin could serve to provide opportunities to work, live, and recreate without the danger of heavy metal exposure. One example of an area that could serve as an alternate restoration site is Plummer Creek. Plummer Creek is a tributary of Coeur d'Alene Lake that is overlooked. Restoration of this stream course could bring great benefit to the Tribe and residents of the Reservation. Addressing some of the problems with the productivity of Plummer Creek, such as fish passage barriers and pollution, could return fish to a stream that is currently barren. This stream and its tributaries are readily accessed and have good potential. For example, local long term residents have indicated trout in Minaloosa Valley's Little Plummer Creek disappeared when the current Little Plummer Creek Culvert under Highway 5 was installed. If this is true, removing fish barriers could readily improve the distribution of trout on the Coeur d'Alene Reservation. Further restoration of streams in this watershed could establish a fishery that is well within reach of local residents.
80	To whom it may concern, Thank you for your efforts and plan to address and restore the waters in the CdA Basin. I grew up in the Silver Valley, Mullan, and can say that I have seen the many changes throughout the years. I began fishing all the waters in the restoration plan starting in the mid 70's. I cut my teeth fly fishing the upper stretches of the St. Joe, the South Fork of the CdA, the North Fork of the CdA, CdA Lake, any pond or puddle and anywhere in between. Both my parents worked in the mines as I was growing up. The Star, Galena, Sunshine, and my Dad is still employed at the Lucky Friday. I understand the seriousness of the problem the mines created over the years, but also have confidence that they have "cleaned up their acts". My mother's last position with the Lucky Friday was to test water coming from the mine and entering the watershed. She could honestly say that the water was clean and the efforts to mitigate the release of heavy metals is working. She also worked on the Super Fund site cleaning the South Fork of the CdA repairing the channel and removing contaminated soil. I do believe that there are areas, as your website points out, that need more work, and I'm happy to see the successes you have had. While this work is very much appreciated and needed, I believe there is another area of concern. Over the nearly 40 years of appreciation I have had for the water basin, the biggest impact I have seen is the over use and abuse from the public. There is no denying that the North Fork of the CdA is in huge trouble during the summer when the "floaters" hit the water. The sheer amount of trash that is found in the water is disturbing to say the least. The same can be said for the St. Joe. Access continues to improve to these delicate areas and is constantly changing the landscape. DO NOT GO BAREFOOT in the North Fork of the CdA, you will require medical attention from broken glass and aluminum cans.
81	As this area is a great concern to me, over fishing and poaching is probably the biggest concern I have. I watched the St. Joe fishery crash over the years that I have fished it, due to, in my opinion, poaching. I can say that over the last few years, I've seen an increase in the number of fish and the health of the fish. Poachers do not understand that killing a genetically superior fish has long term effects and literally removes hundreds if not thousands of strong, healthy fish from the river system. Left unchecked, anglers will poach. I was up at Jordan Creek one year with my family and a fish and game officer (John Scott)

	came by. I had a lengthy conversation with him about the impacts of poaching on the CdA River, especially in the headwaters. He said if he wrote 100 tickets for poaching fish in one summer, 90 of them would be at Jordan Creek. It seems that some people cannot resist killing a 24 inch fish, unknowingly, destroying a gene pool that takes years to restore. The problem is that there just isn't enough Fish & Game officers to canvas the area. Anglers know where they can get away with breaking the law. As a rule, I'm not interested in growing government agencies, but this area is in dire need. More oversight and enforcement is drastically needed. I was camping at Spruce Tree a few years back and was getting ready to hike up to the Garnet Mine and fish my way back with my daughter, when I spotted an angler cleaning his fish at the rivers edge. This blatant disrespect for the rules and laws set up to protect these delicate fish is infuriating. When I reported the incident, I was told it would be nearly impossible to do anything about it unless he was caught red-handed by the enforcement officer. Most vehicles in the camp that day were Washington plates. More oversight and enforcement needed. Thanks.
82	I wish to subscribe to be on your mailing list to receive future information: My offices and contact information are listed below [redacted].
83	Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness-values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. The Idaho Conservation League applauds the Restoration Partnership for their work and involving the public in the planning process. We have no doubt that there is a high level of interest in the mitigation funds that will be made available through this program. Therefore, it is imperative that the programmatic EIS prioritize the types of projects that will be funded.
84	Secondly, since the funds are a result of a settlement related to the history of mining in the Coeur d'Alene Basin, we recommend that the use of the mitigation funds be restricted to mining-related cleanup and restoration.
85	The EIS should also set reasonable goals, objectives, and outcomes that the Partnership desires to achieve.
86	The Partnership might also wish to establish some general criteria for the types of projects that will be funded. We encourage the partnership to utilize some of the existing knowledge about where mining has affected the basin. For example, we encourage the Partnership to consider the Idaho Department of Environmental Quality's integrated 305(b) report, which lists all of the impaired waterways in the State of Idaho. Similarly, the total maximum daily loads are another potentially useful resource for prioritizing the cleanup of heavy metals and mining related pollution in the basin. Other agencies, such as the Bureau of Land Management, Forest Service, and Idaho Department of Lands may also have watershed assessments or other documents and resources available, describing site-specific information about the effects of mining in the basin. This information could be used to prioritize restoration sites, areas, or zones where the Partnership expects to produce the greatest environmental benefit or emphasize project funding.
87	Finally, projects should be prioritized that will result in the greatest long-term benefit to the environment. Projects should be avoided where there is no assurance that the outcomes will be permanent. Projects on private or state lands that have no restrictions on future development are examples that should be screened.

88	I really enjoyed seeing the "before and after" creek restoration project photos. Although you provided a good narrative description of what improvements were made, I would like to see some basic descriptive data visuals (i.e. bar chart data of before and after metrics). I think simple visual charts that demonstrate improvements that were made from such projects are easy to post and have a big impact on the viewer. Thank you and great job! - [redacted].
89	I am writing to you in hopes that you will seriously consider Mica Creek as one of your projects. Let me tell you how Mica Creek and the "swamp" as we called it, has changed over the last 57 years, particularly since the highway 95 project began. I grew up spending summers on Mica Bay. As children, we would take the canoe into the swamp and up Mica Creek to swim and explore. It was a flowing creek full of life including freshwater mussels, crawdads, giant bullfrogs, fish and freshwater periwinkles. The water was crystal clear and we used to love to get off on the sandy beaches and swim. Giant trees filled part of the wetlands where we experienced a large diversity of birds and water fowl including the rare Great Horned Grebe. It was not uncommon to see moose and beaver. From our cabin deck we would see the familiar "S" shaped pattern the creek made as it flowed in it's channels on into the bay. Visiting the swamp was almost always a daily activity as each visit presented something new in the wild wetland swamp. Each year following the 95 Highway project, Mica Creek became more and more congested with silt and run-off. The end of the bay became full of sediment, the fresh water became murky and stagnant. The mussels, crawdads and giant bullfrogs died. The diversity of wildlife and birds declined and the trees died. The worse is that the destabilization of the creek CONTINUES to bring HUGE amounts of mud and silt into the mouth of the bay each spring, building a large delta and encouraging the spread of invasive seaweed. Each year we watch as the growing silt and seaweed gets closer and closer to our dock. The swamp is no longer an enjoyable place to visit. It has been ruined by the highway project and the road development. I hope you will consider two things: 1. Repair the creek by stopping erosion, run-off and stabilizing the banks. 2. Re-establish the natural creek flow by removing sediment build up both in the creek and at the mouth of the bay. Remediation of the devastating effects from Dept. of Transportation would benefit our family and residents by once again making that part of the bay a desirable place to boat and view the diverse wildlife. It would dramatically improve water quality. Thank you so much for your wonderful organization and consideration. Sincerely, [redacted]
90	Keep and preserve wetlands.
91	Purchase properties with secondary streams. Remember, all water runs downhill.
92	Keep out of state rafters at a minimum.
93	Fine people double that leave trash.
94	Any trash blowing out of the back of trucks should be fined $100 and up.
95	We here at Fins and Feathers talk to people fishing out on Lake CDA every single day. The people that we talk to on a daily basis would like to see more smallmouth and large mouth bass, as well as Northern Pike. The people would also like to see more of the landlocked chinook in the lake. People would like to see "NO" more stirring up of the Redds up the River systems. People do not catch the stocked Chinook out there. Please call for more input. Thanks.
96	I did my master's research in the lower Coeur d'Alene River basin with the UI under Matt Morra. We looked at metal(loid) solubility caused by seasonal changes in wetlands. The sheer amount of lead, cadmium, arsenic, and zinc in this system is staggering. The pathways

	for metal mobility are many and complex. If I could help shape the reclamation effort, I would strongly caution against widely disturbing sediments in the lower river system. A stable, reducing environment, seemed to keep many of those hazardous materials mostly immobile.
97	On 7/1/01 the Idaho Department of Transportation started improvements to U.S. 95 South of Kidd Island Rd. On 1/23/10 a retention basin for that project started to fail and a wall collapsed on 1/25/02 sending a significant amount of foreign material into Mica Creek and then Mica Bay. On 8/24/04 the EPA filed suit for 164 violations of the Clean Water Act, and the Mica Bay Property Owners Assn. (over 30 members) intervened in the suit. Since receiving a settlement of $1/2M, our association has provided matching funds for Larry Mundt's 319 Grants to proactively and systematically reduce stream bank erosion in Mica Creek. We have currently been granted a permit to remove 1K cu. yds. of the foreign materials deposited by the retention basin failure near the public boat launch on Mica Bay. Our available funds are not enough to remove all the foreign materials deposited in the bay, which has reduced water quality, fish habitat, reduced recreational opportunities and limited access to the BLM water park, Kootenai County boat dock and waterfront residents' docks. Restoration projects to remove the foreign materials from the bay would fall within the purview of your organization. In addition, our organization would be willing to assist in financing projects on Mica Bay which would improve water quality, fish habitat, recreational activities and access to the BLM water park, county boat launch and residents' docks. **[Attachment B; 194 MB]**
98	I would like to see more efforts in enforcing fines for littering the rivers and camping grounds.
99	Hello! The devastation to the mouth of Mica Bay caused by the erosion of Mica Creek is unbelievable. If you could see the west end of the bay in the winter when the lake is lowered, what used to be water is now mud - from way beyond the county dock to beyond the park. The area of the bay where we used to water ski is now shin deep in the summer and completely dry in the winter with large delta like mounds of mud and silt. Additionally, the continued erosion of Mica Creek produces vast plumes of mud, logs and debris that creates a giant whirlpool filling the remaining water of the entire west end of the bay, then depositing more sediment creating a giant delta. It is only a matter of time before our dock sits in the mud. As a child growing up on Mica Bay, we used to canoe up Mica Creek and experience vast wildlife and clear water. The swamp was full of giant trees and the creek was lined with sandy beaches and contained mussels, periwinkles, crawdads, fish and bullfrogs. I believe that the devastation to this valuable area and continued MAJOR erosion to Mica Creek was caused by the re-build of Highway 95 plus poor practices upstream. If the shores of Mica Creek are not stabilized all the way to the source and the creek bed is not dredged all the way into the bay to promote correct flow, the property owners on the west end of the bay who have been here for 50 plus years, will lose our water front. The milfoil is taking over and spreading rapidly and the silt sediment is growing deeper while the water at the end of our dock is getting shallower. The [redacted] family hopes you will consider restoring Mica Creek and the West end of Mica Bay as one of your projects. It has been very difficult to watch the changes and know they were all man made. Thank you for your consideration and valuable program. Sincerely [redacted].
100	As you are probably aware Mica Bay on Coeur d'Alene Lake is having a problem with silt build up from changes in Mica Creek. The cause of this maybe from several conditions, highway building, animal in the stream and or logging further up but the result is loss of

	habitat, property loss and recreational loss. We used to be able to water ski into a ski dock that if it were there now would be sitting on the ground. Boats often think the end of the bay is navigable and end up churning up mud and seaweed if not completely stuck. The seaweed is so think it actually ripped the skeg off my rowing shell as I got caught in a big floating mass. We would appreciate your consideration of restoration in your planning efforts. It is wonderful to know an organization of your type is in existence. Thank you, [redacted].
101	This letter is in regard to Mica Creek on Coeur d'Alene Lake. I understand that your organization is looking for restoration projects and I would appreciate your consideration of the silt run off that has changed this beautiful refuge. During and after the highway 95 construction the stream was adversely affected. It used to be a clean meandering stream with lots of birds, mussels and frogs. Now it is brown and full of debris. The banks are sloughing off and property owners as well as lake users are losing the areas of water due to silt deposits. I don't know if it is possible to return to what we had but at least stopping the continuing silt deposits would make a big difference. Thank you for your consideration, [redacted]
102	RE: Restoration Plan CDA River 1. Help keep river clean and healthy by limiting out of state users. 2. Steep fines for leaving trash along river and roadways, especially by river floaters. 3. Gain greater control of river by purchasing secondary creek properties to ensure clean wetlands. This would include properties that have underground springs. (Old River Road has many for example) 4. Impose stiff fines for people who abuse the river and it's tributaries - both incoming and outgoing tribs- by driving ATVs and motorbikes through the water.
103	Restoration Partners, first I would like to say that the Restoration Partnership is a great idea and hope that good things will be accomplished with this kind of community effort. My interests are in the area of watershed, stream and spawning habitat restoration. I have been a past member of the Kootenai/Shoshone Water and Soil Conservation District board and am currently on the CdA Lake WAG, Idaho Master Forest Stewards, Idaho Master Water Stewards and owner of a forested ranch. The projects that I would like to like to see implemented would mostly be riparian in nature, especially stream and spawning habitat restoration on smaller tributary streams in the region. Several projects have been initiated on the CdA River and several are in the planning stage. I feel that many of the less visible streams have degraded over the years due to logging, mining and farming practices. An effort to bring these streams back to their natural status would be a great bonus to dwindling cut-throat and bull trout populations. I have a special interest in this because our ranch has Adams, Fortier and West Fork Fortier Creeks running through the property. Due to past farming and logging practices the vegetation has almost been eradicated from the stream banks for about 300 yards below where the creeks merge. The result is severe bed loading and bank erosion that takes place during the spring run-off. Due to the bed loading the creek goes subsurface in the summer killing many trapped cutthroat trout. There is a surviving population of cutthroat trout in the creeks but not nearly what it had been historically. This Creek is one of the main clean water feeds to the Killarney Lake and it needs some help to return to it previous glory as a fishery. I feel that smaller streams such as these are the 'low hanging fruit' when it comes to restoration and enhancement projects. Several could be restored in the region of concern and may have more net effect than some of the larger long term projects that are of greater visibility. Many of the streams are on private ground but the fish that would spawn and grow on them would be shared

	throughout the CdA River and Lake system. Thank you for your consideration. Sincerely, [redacted]
104	Dear Restoration Partners, the projects that may arise from all of the planning and comments are a great opportunity for education. Most of the projects will include planting shrub, trees etc. and to engage the public and especially the youth, would help to insure future stewardship to our lands. I would volunteer at this time as an elder to help in guiding their hands. [redacted]
105	No additional recreation lots created.
106	Maintain water quality with NO concrete "channeling" of streams.
107	Expend resources to possibly "buy back" recreational lots as they cause bank destabilization, additional sediment and nutrient run-off.
108	Rip Rap the more erosive outer banks where "softer" soil erodes at high water.
109	Maintain public access while respecting private property rights.
110	Born and raised in Spokane, and from a family with a long history in the North Idaho Silver District, I have had the good fortune to be married for over 30 years to a woman whose family has a place on Mica Bay. During that time, our family has spent the vast majority of its vacation time enjoying the lake and its activities: sailing, water skiing, swimming, fishing, hiking in the summer, and cross country skiing in the winter. In my professional career, I have travelled all over the world, and in my experience Lake Coeur d'Alene is one of the most beautiful places I have ever experienced, and a great ecological treasure for the entire North Idaho area. In that context, it was tragic that in the construction of the new US 95 over a decade ago, the State of Idaho DOT failed (multiple times) to adequately supervise the construction contractor in soil and runoff control and retention as the highway crossed Mica Creek. This culminated in a massive runoff of silt into Mica Bay, the creation of the Mica Bay Shoreline Property Owners Association, a lawsuit on the behalf of the Association and settlement of the lawsuit with the award of approximately $500,000 to the Association, funds which remain unused and available. It is appropriate to note that land use in the Mica Creek basin had been detrimental to flood control and erosion years before the US 95 disaster, and that unpermitted straightening of the creek, levees and other activities contributed to the problem. Currently, the Creek continues to periodically flood at very high water flow levels, and continues to suffer from bank erosion dumping massive amounts of silt and vegetative debris into the shallow end of Mica Bay. The irony of course is that the Mica Bay swamp no longer functions to trap these sediments, as the creek flows during lake low water level periods at literally white water speeds through the swamp and directly into the Bay. Naturally, the sediments continue to create new mudflats, clog the water intakes of residents who rely on lake water for irrigation or residential use, silt and kill the historical sand beds used by Kokanee for egg laying, and rapidly make the end of the Bay including the public boat dock and Mica Bay boat park ever more restricted and difficult to access for boaters. I can tell you that viewing the scope of the runoff and impacts on the Bay during the mid-winter months is simply shocking, and leads to the conclusion that over a relatively short period of another decade or so the entire east end of the Bay will simply no longer be a functional portion of the Lake. We know, of course, what is required. It seems unlikely that dredging the silt from the lake bed will ever be allowed, given the heavy metals history of the basin. What seems right is to at least stop further damage coming from runoff from Mica Creek, requiring classic stream restoration, slowing the runoff, providing high water flow sedimentation ponds prior to the creek's entry into the Lake, streambed erosion control and so on. I am not personally a member of the Mica Bay Shoreline Property

	Owners Association, but my discussions with members of its Board over the years since the settlement award suggest to me that since the $500,000 is clearly not enough on its own to provide any significant mitigation, the Association has been "frozen" in a lack of clear direction for use of the funds. It is my opinion that the Restoration Partnership could take a leadership role in focusing efforts on reducing if not eliminating further damage to the Lake from Mica Creek, and with joint funding from the Partnership and Association provide meaningful positive impact on the quality and usage of the Lake for current and future generations. Regards, [redacted]
111	I enjoy hiking, bicycling, kayaking, and swimming in the Coeur d'Alene basin. As part of a restoration strategy, I would like to see projects focused on preserving natural open space, habitat restoration and enhancing passive outdoor recreational opportunities along the Spokane River in Kootenai County. This would serve the greatest number of people and protect resources most at immediate risk from development pressures. Two specific areas that I would like to see preserved, restored, and enhanced are as follows. 1. The north shore of the Spokane River in Coeur d'Alene between Riverstone Park and Mill River Park. This area has an inactive railroad easement that connects these two city parks. In addition two large former industrial sites are adjacent to the old rail line between the parks which include about one mile of shoreline. If some, part or all of these sites were be acquired, then the river shore could be restored to a more natural condition, a natural buffer could be created to protect the river from future development and outdoor recreational opportunities such as hiking, bicycling, kayaking, fishing and swimming could be provided for. Potentially these sites could become a riverside greenbelt and utilize the amenities already in place at the city parks. The City of Coeur d'Alene has a bikeways and trails master plan that targets this corridor, specifically the old railroad easement and they should become a partner in making this project a reality. 2, The north side of the Spokane River in Post Falls between Corbin Park and Kootenai County's Stateline Park. The area of the Riverbend Commerce Park contains undeveloped building sites along the river and light industrial plants on other lots that do not extend to or use the river. If easements could be secured along the shoreline as well as the shoreline of the Post Falls Event Center and the Jacklin Seed facility, a continuous greenbelt along the river could be created. This greenbelt would connect to Corbin Park via the City of Post Falls owned Corbin irrigation ditch and to Kootenai County's Stateline Park via the large undeveloped site west of the Jacklin facility. This would protect over two miles of scenic river shoreline and possibly provide a location for outdoor recreational uses such as swimming, rafting, fishing, hiking and bicycling. This project could be connected to the Centennial Trail creating a four to six mile long loop. Possible partners could include the City of Post Falls and Kootenai County. Thank you.
112	Comment from Kootenai Environmental Alliance Submitted online: August 19, 2013 The Coeur d'Alene Basin is rich in diverse natural resources that unfortunately have not always been treated with the care and respect they deserve. We are happy to see funding from the CERCLA settlement being utilized for the protection and restoration of our environment. With the continued extraction of these natural resources Kootenai Environmental Alliance feels that it should be a priority of the Partnership to acquire and preserve land (especially properties in sensitive watershed areas) for precious wildlife habitat and for outdoor recreation that the public may enjoy for generations to come. There are a few opportunities for land conservation purchases that we support and feel would be good use of Restoration Partnership funds. 1- There is 2,700 acres along Prichard Creek owned by Dr. Elizabeth Gardner that is up for sale and being pursed for holding by Western Rivers Conservancy. It is

	rare for such large parcels of private land to become available for public acquisition and should be acted on with support from RP. Prichard Creek was degraded by historic gold mining activities and thus there is great potential for riparian restoration that could restore the Creek to a blue ribbon fishery for the public to enjoy. The surrounding acreage would provide ample opportunities for public outdoor recreation since access already exists from Prichard Creek/Thompson Pass Road and is adjacent to Forest Service property. The property's size, resources and location make it a perfect fit for a RP project as this is a high quality recreation area that requires protection of its recreation resources. 2- With many wetlands along the Coeur d'Alene River having been contaminated with toxic heavy metals it is important that RP funds be utilized to restore and create attractive wetlands for migrating waterfowl. Unfortunately, toxic heavy metals aren't the only threat to the beautiful Coeur d'Alene Lake and Spokane River. Over the past few decades the lakeshore and riverfront have experienced a boom of development and a lack of protective shoreline ordinances. Shoreline buffer zones are important for providing protection of water quality (preventing soil erosion and sedimentation) and important habitat for insects, birds and other animals. With Coeur d'Alene Lake and the Spokane River being high use areas for locals and visitors from around the world, Kootenai Environmental Alliance feels that it is important to reserve RP funds to address restoration needs and preserve undeveloped lakeshore/riverfront properties. Some of these opportunities may include: 3- Mica Bay Restoration Project led by the Mica Bay Homeowners Association to restore water quality, fish habitat and recreational opportunities. 4- Acquisition of the Old Atlas Mill site which is located on approximately 22 acres along the Spokane River. This site is currently owned by Washington Trust Bank and is being prepared for sale (likely to a developer). We instead would like to see this property and others like it preserved for conservation and public access. This would be an ideal site for an arboretum. Thank you for your consideration of our comments. Looking Forward~ [redacted] Kootenai Environmental Alliance
113	Dear Restoration Partnership, The Coeur d'Alene Lake Tributaries Watershed Advisory Group is a group of people with various interests in the watershed that share a common concern/interest in the sustainable health of the watershed. The watershed includes the Coeur d'Alene River downstream from Cataldo, its respective tributaries, and all tributaries to Lake Coeur d'Alene except the St. Joe and St. Maries Rivers. The Coeur d'Alene Lake Tributaries WAG has been meeting since December of 2010, and since that first meeting, have gained considerable momentum with regards to restoration goals established in the subbasin. Much discussion has been centered on implementation of EPA-approved TMDLs relative to the individual tributaries that contribute to the Lake. During these discussions, Latour Creek, Wolf Lodge, Creek, and Fernan Creek have been highlighted as priority tributaries to focus restoration efforts. Other tributaries have been a focus of our discussions as well. Numerous landowners and natural resource professionals have contributed their time to evaluate restoration opportunities, to gain landowner interest, and work towards common goals of reducing sediment and restoring floodplain processes across the watershed. As the Restoration Partnership moves forward with writing their plan, we ask that you work with the Watershed Advisory Groups (WAG's) to achieve common goals. The WAG's maintain a wealth of historical perspective and valuable knowledge relative to natural resource restoration and effective partnerships in this area. Sincerely, CDA Lake WAG
114	Using beavers as agents of restoration is something that is not only unique, but proven in

	creating valuable wetland habitat and restoring creeks, rivers and streams. I encourage you to consider beaver management and relocation strategies into the basin whenever possible. Working with the staff of The Lands Council and their watershed restoration and beaver ecology staff would be a great service to the Restoration Partnership.
115	Research I think some of the money should be used to assess existing conditions and determine the likelihood of projects' long term success prior to initiating them. For instance, before restoring or enhancing water bottom or shore land in the Chain Lakes area, an investigation of what areas won't flood again would be wise to conduct. It would make no sense to restore areas that will be recontaminated by flooding.
116	Second, I believe an assessment of where contaminants are entering Lake Coeur d'Alene and the Spokane River should be done prior to mitigation. A few years ago the IDEQ proposed determining how much contamination was being generated by subdivision developments around the lake. Though it was not pursued, this project's design and implementation plan might provide guidance for using Restoration Partnership funds on similar projects.
117	Community Involvement Once the proposed projects are identified, consider letting the public, nonprofit organizations, and regulatory agencies narrow and prioritize the list. This is being done by the Spokane County Conservation Futures program. People propose areas worthy of being purchased for public ownership. This list is then prioritized in response to community input.
118	Cleanup, Restoration, and Enhancement Cleaning up contamination and restoring and enhancing areas around water is very important. A cost-share opportunity may exist to work with the people living around Mica Bay to restore it. It was damaged by the Idaho Department of Transportation as it redeveloped US 95. In a legal settlement the court awarded the Mica Bay organization money to repair damage done to the bay, but to financially undertake this project the Mica Bay group would need to work with other entities such as the Restoration Partnership.
119	Increasing Public Water Access and Acquiring Public Land Acquiring public access and waterfront land is important as well. After all, the public owns the water, but in many cases is restricted or barred from using it. There is simply not enough public access to lakes and rivers in north Idaho. Consider buying or obtaining easements on waterfront property near highways. Also, consider supporting private/public alliances that seek to combine private enterprise with public use. Such an opportunity exists at the old Atlas Mill site on the Spokane River south of Seltice Way in Coeur d'Alene. A private buyer wants to build some type of sports and entertainment complex on the north side of the property, and may be willing to donate or sell the southern part of the property to a nonprofit for public use.
120	Advertising Success As projects are undertaken and completed they should be visibly publicized. Highway projects are described and their completion announced through highly visible signs. A similar campaign might accompany the efforts of the Restoration Partnership.
121	Extending the Restoration Partnership's Long Term Influence Perhaps the Restoration Partnership might entertain the idea of establishing an interest generating fund or trust to be used when joint land acquisition opportunities arise. Such a fund could only be used for joint public/private land acquisitions.
122	I am writing for the Fernan Lake Recreation and Conservation Association. We have a membership that represents people associated with Fernan Lake, which is located in Kootenai County. We help monitor water quality with Idaho Department of Environmental

	Quality and IdahoH2O, work with Eastside Highway District with road and access maintaince, and generally look out for the integrity and wellbeing of the Fernan Lake watershed. Fernan Lake is one of the most fished lakes per acre in the state of Idaho. In addition it is used for recreation such as waterskiing, paddle boarding and kayaking, and is the home for the Coeur d'Alene Rowing Club. It also is the home of two eagle nests, several osprey nests and numerous waterfowl and shore birds nests. As a result of significant blue algae blooms the last 2 years the lake has had to be closed as a water hazard by the health department to protect the public and pets for toxins released by the blue green algae. We have been working closely with DEQ in the development of a TMDL study focused on phosphorus loading, which plays a major role in these recent algae blooms. We are diligently working on options to mediated and control these recent blooms. Several proposals have been offered by the various agencies involved, such as improving vegetation issues resulting from the recent road construction along Fernan Lake and Fernan Creek. We are trying to develop programs to educate the land owners and users of Fernan Lake on best practice to decrease nitrate and phosphorus loading with the Idaho Lake Assist Program. We have been offered studies proposed to evaluate the health of our wetlands and healthy dam management by experts from the University of Idaho. We are trying to develop funding sources for these various studies and projects. As part of the Coeur d'Alene Basin, we would like to discuss further with you these restoration studies and efforts we need to put in place to improve and maintain this valuable recreation and natural resource. We would like to present to the Restoration Partnership opportunities to enhance this watershed. Thank you
123	Please consider in your deliberations exercising your collective thoughts and processing information toward restoring the South Fork of the Coeur d'Alene River to an asset rather than liability.
124	Please put money into restoring the South Fork CDA River.
125	Don't take 30 years like the EPA to get the job done.
126	Use your money where people are currently living (i.e. on household properties).
127	You guys should have an economic expert to address the economic services lost due to mining companies moving out of the area.
128	You guys should focus on the cultural services lost (e.g., movie theatres, etc.).
129	I think Shoshone County should be on the board making decisions.
130	Who is the point person on economics and cultural services?
131	I represent [redacted], the owner of approximately 2,800 acres known as the Coeur d'Alene Placer Mining Company. The property is situated along the N. F. Coeur d'Alene River (24 acres) then due east for almost the entirety of Prichard Creek. The goals of the partnership to "restore wetlands, riverbanks, and fish habitat while improving water quality" match the opportunity for this property perfectly. I expect the 24 acres of private ownership along the N.F. Coeur d'Alene River at the mouth of Prichard Creek is the single largest private ownership remaining which could provide excellent public access to the N. F. Coeur d'Alene River. Prichard Creek itself sub-terrains where the hydraulically minded rubble piles are most prevalent near Murray preventing west-slope cutthroat trout and bull trout migration. Reconnecting this stream reach would unlock valuable habitat for both important native fish species. The property is currently under contract to Western Rivers Conservancy who is working closely with the BLM and USFS during the due diligence period. Restoring this placer mining property to public ownership is an important opportunity for the Restoration Partnership. The alternative is private ownership, with recreationally

	focused lots dotting the river and Prichard Creek resources for all time. Best regards, [redacted]
132	The problem I have with the water quality map is that it implies that the fewer number of pollutants a watershed has, the better off it is. So those with zero are the best (obviously), and those with one are only slightly worse off. However, if that one pollutant is lead, I'd think that should be depicted as very bad (the red end of the scale). There are three watersheds in the S. Fork CDA that bother me. The watershed around Mullan is depicted as blue representing a "good" watershed. The same for Big Creek. Should these two watersheds really be near the top of your scale (fewer number of pollutants equals a healthier watershed)? Latour Creek shows green (two pollutants). The lower part of Latour Creek is within the lower CDA River floodplain where we know there are lots of nasty pollutants. A better way to depict these needs to be found. Some of these pollutants are "worse" than others and probably should be depicted that way. The pollutants could be ranked one through nine (good through bad) or they could be grouped into two or three groups and then the groups ranked. Then you could combine the number of pollutants with the "badness" rank to get a more accurate picture of the true health of the watershed, or maybe just use the ranked groups. I'm sure there are other ways to look at this data.
133	I was impressed. As a tribal member-this was an eye opener for me-I don't know all the terminology or understood what was being told, however; what I did learn is that we have a problem with lead and other kind of chemicals in our watersheds, due from the mines in silver valley. Am I correct? And the lead has spread and is affecting the wildlife, such as fish and birds. The lead is spreading into our Wetlands and watersheds causing our wildlife to die. Some of the keys things I did understand was the kiosk machine, because one of our grants will be using this kind of machine to monitor energy savings on a solar panels. So I was interested by this and I know the data that will come from this kiosk machine will be valuable learning curve for your restoration project; as well as our school aged children, tribal members, grant writers, etc. The Data will also assist in your quarterly reporting to your grant officers and maybe to EPA-Super fund people. The second component I learned was where to start the clean-up of the watersheds and what kind of priority should be given? I feel this is where you will get a lot of information from your public meetings and you will learn how people will feel, especially the Tribal Member; as well as commissioners, and the state of Idaho. I think this is a good project and I think you have some battles-however; with every battle comes victory and from what I heard Lake Management has many victories under their belt. So good job and keep on battling for our clean water.
134	[redacted], Attached should be maps/location for the patented mining claims on Olentange Creek we talked about a couple days ago, in conjunction with the Hecla settlement and the Restoration Partnership. We have talked with both [redacted] and [redacted] in the Cd'A office [redacted] about the Forest Service purchasing this property. They would like to move ahead, but there is not funding. The claims are completely surrounded by NF property, partly in designated roadless area East of Olentange Creek,, and in most of that area of the Idaho/Montana border is grizzly bear habitat. Olentange Creek feeds into Loop Creek which (as I'm sure you know) is a major tributary of the North Branch of the St. Joe River. Olentange Creek is 5'-6' and about a foot deep, and really tumbles down the mountainside. There is an old mine on the property and numerous adits/cuts. Tests were done on stream water both up & downstream with results shown in the report. (My recollection of the report was incorrect.) The report is numbered 3.14 HANSY MINE (Site

	No. WL-516) Alternate name - Hansey Mine and runs from page 119 to 140. If you have trouble finding this report, we can put it in the mail. It would be good to get this mining site cleaned up properly, and the land in public ownership. We are hoping the Restoration Partnership can get involved. We understand the 'scoping' period ends Aug 27, but wanted to follow up with you this morning. Please sure this is part of the record. Thanks for your time. Please let us know if we can provide additional information that might help. Sincerely, [redacted] **[Attachment C; 7 MB]**
135	The Nature Conservancy appreciates the opportunity to submit scoping comments on the Coeur d'Alene Basin Restoration Plan. We hope our input will be useful as you develop restoration alternatives. The Coeur d'Alene Natural Resource Damage Assessment (NRDA) provides a historic, and challenging, opportunity to restore the natural resources injured by a hundred years of mining in the Basin. We understand that the Trustees face difficult decisions and would like to be of help any way we can. The NRDA settlement provides one of the largest funds for natural resource restoration Idaho has ever seen. However, the Basin is a large geographic area with significant resource damages and numerous affected stakeholders. There will be many competing demands for settlement funds. As you develop alternatives for the Restoration Plan, we hope you will consider the following principles to guide your decision-making: 1. Take advantage of the best available science from restoration and landscape ecology. 2. Use the full range of options to "restore, rehabilitate, replace, and/or acquire the equivalent of the injured resources." [42 U.S.C. 9607(1)(1)]. 3. Maximize return on investment. Fortunately, there is a large body of literature and experience in restoration ecology on which to base a cost-effective restoration plan. In the following pages, we suggest ways to take advantage of ecological processes, use a mix of restoration strategies, and maximize ecological returns from the settlement investment. We are sensitive to the need to meet societal, in addition to ecological, objectives through the Restoration Plan. Many stakeholders will advocate for spending the settlement funds in those places most directly impacted by mining even if these sites are expensive to rehabilitate and the potential for restoration is limited. One of the challenges for the Trustees will be in striking the right balance between ecological and societal needs. We ask the Trustees to develop a Restoration Plan that invests in a diversified set of actions across the Basin in order to strike that balance. We also know that the restoration Trustees and team have a great deal of experience and expertise. While we recognize that these comments may restate considerations you have already taken into account, we believe they are important to emphasize. The Nature Conservancy works in local places across all 50 states, and in 35 countries around the world, to protect ecologically important lands and waters for the benefit of both nature and people. We use the best available science and a collaborative approach to achieve lasting, measurable results. For example, through our Great Rivers Partnership, the Nature Conservancy is helping lead large-scale restoration efforts in watersheds around the globe. In the central U.S., our planners and practitioners work with multiple agencies and stakeholders across 10 states to restore ecosystems in our Mississippi River Basin Initiative. Here in Idaho, we have worked with communities and landowners since 1976 when we purchased our first preserve, Silver Creek. Since then, we've helped conserve more than 400,000 acres of wildlife habitat in many of Idaho's iconic landscapes. We have also been a leader in successful multi-stakeholder collaborative efforts such as the Kootenai Valley Resource Initiative, the Clearwater Basin Collaborative, and the Owyhee Initiative. The Coeur d'Alene Basin is an area rich in biodiversity. Its abundant wetlands make it a key stopover for migratory waterfowl along the Pacific Flyway. Fish like bull trout and cutthroat trout still ply many of the Basin's streams. Large mammals including

	moose, elk, and mountain goats thrive in the Basin's forests. We see a high degree of alignment between Nature Conservancy priorities and the purposes of the settlement agreement. The St. Joe Sub-basin comprises one of seven priority landscapes for The Nature Conservancy in Idaho. The St. Joe emerged as a priority based on its high biodiversity, intact ecological functions and values, and opportunities for meaningful conservation. Historically, the Coeur d'Alene River Basin would have boasted many of the same ecological attributes. We see a convergence between the "injured resources" identified in the NRDA settlement and the conservation values we have identified in the St. Joe: Cool, clean water for fish and other aquatic life; Healthy riparian forests; and Soils and sediments that are safe for people and species like Tundra swans.
136	Use Best Available Science. There is a growing body of literature and case studies regarding ecological restoration. This information can help guide decision-making in the Coeur d'Alene Basin to determine where, when and how to restore the injured resources. For example, Holl and Aide (2011) offer a conceptual framework for when and where to actively restore ecosystems. Their framework takes into account ecosystem resilience, land-use history, landscape context, restoration goals, and available resources. While the variables that drive your decisions are many, we hope you will consider the following principles and discussion questions as you formulate alternatives: Be clear about expected outcomes. What is the overall vision for the Basin and each sub-basin? Will a particular project restore a limited service or a full suite of ecological functions and values? Cast a wide net for data. Are there previous efforts that can inform your sub-basin assessments? What analytical tools are available and appropriate? Are there non-governmental data sources like private companies or nonprofits? Monitor, measure, and adapt. Will the monitoring regime demonstrate success against the expected outcomes? How can the Coeur d'Alene Restoration provide lessons for future efforts? Will you be able to adapt strategies based on previous results? Work with natural processes. How resilient is the ecosystem to the disturbances that have occurred? Is passive restoration (i.e., removing the source of degradation) enough to achieve restoration goals? Or has a particular resource crossed ecological thresholds beyond which it is unfeasible to restore historic conditions? Focus on threatened resources and systems. What resources require urgent attention? What's the most cost-effective way to restore each resource? Is it less expensive and more feasible to protect an intact resource or try to restore a damaged one? Consider a multi-scale perspective. What will make restoration results durable and resilient? How will disturbances like fire and flooding impact restoration projects? How do individual projects provide habitat connectivity for wide-ranging species? How will climate change affect restoration?
137	Use Full Range of Options Due to the extent of resource damage in some parts of the Basin, we believe it will be important to invest in a diverse set of restoration activities. Fortunately, the law recognizes a broad definition of restoration, allowing the Trustees to, "restore, rehabilitate, replace, and/or acquire the equivalent of the injured resources." [42 U.S.C. 9607(1)(1)]. By pursuing a thoughtful mix of restoration strategies, we believe the Trustees can maximize restoration benefits while minimizing the ecological, and financial, risks of your investments.
138	Maximize the investment The Coeur d'Alene NRD settlements provide a historic amount of funding for restoration. However, the large area, the high costs of natural resource restoration, and the extent of damage to injured resources could quickly use up these funds. Making the most of the settlements will require thoughtful decisions about when, where, and how to expend the funds. We laud the effort the restoration team and trustees

	have made to date in carefully planning for the use of the settlement funds, and hope this diligence will continue. Leverage settlement funds with other funding sources We believe there is an opportunity to extend and in some cases even multiply the settlement funds by leveraging them with other funding sources. Perhaps the best opportunity for leverage comes from close collaboration with the EPA Superfund clean-up effort already taking place in the Coeur d'Alene Basin. We appreciate the distinction the restoration team has already made between restoration and remediation in existing projects, such as the East Fork Moon Creek, as well as the recognition that future restoration project timing and funding will be closely coordinated with the Cleanup. We urge the trustees to seek additional opportunities for collaborative partnerships that stretch restoration dollars. Private foundations, corporations, and state and local entities are possible sources of partnerships and funding. And, because the NRDA funds come from non-federal sources, they may be used to match federal funding opportunities as well. Finding non-federal funding to match federal funds is often a critical barrier to implementing restoration projects in other parts of Idaho. Ensure permanent protection of restoration investments We urge the trustees to consider land ownership and land use status before investing in restoration of injured resources. We believe it is important to spend the limited restoration funding on lands and waters on which restoration efforts are not likely to be adversely affected by potential future development. These include land and waters under state or federal ownership as well as private lands under conservation easement. Conservation easements may be an effective tool for use in the Basin, especially since local constituencies are likely to be sensitive to acquisitions by the Trustees. Conservation easements not only keep private lands on local tax rolls, but also help keep working lands economically productive. They also provide the opportunity to develop restoration or conservation plans with landowners who might not otherwise do so.
139	Summary The Coeur d' Alene Basin Restoration marks a turning point in the history of the region. By restoring and protecting the rich natural resources that define the Basin, the Trustees can help shape a bright future for its people and wildlife. The Restoration provides a rare opportunity to restore clean water, healthy forests, and safe, productive soils. These in turn will provide a strong foundation for a vibrant economy and a high quality of life for people who call the Basin home. While the challenges are many, we believe the Trustees and restoration team have the tools, expertise and thoughtful approach to make the most of this historic opportunity. Thank you for your consideration of our scoping comments. If you have questions, please contact [redacted]
140	I own property on Lake Coeur d' Alene and have fished the lake from time to time. There are many exotic (not native) species of fish in the lake. I do like to catch and eat kokanee and chinook salmon. I know that both species are "exotic." There are many other exotic species that have a significant adverse impact on kokanee. Those exotic species include, large and small mouth bass and northern pike. I don't know who introduced the bass and pike. Other exotic species were introduced, including rainbow trout. I don't know that the mine waste had any adverse impact on kokanee. However, I would like to see the fishery improve by eliminating, as much as possible, the bass and northern pike. I have the impression that there are fewer osprey because there are fewer kokanee or other prey fish in the water.
141	I believe the water quality could be improved by controlling the introduction of nutrients into the waters of the lake. I don't think the evidence shows that the lake shore owners are

	having a significant impact on the water quality. However, land use practices along the waters that flow into the lake (farming, etc.) do introduce nutrients into the lake.
142	I do support taking action to protect water fowl from ingesting toxic waste. I urge you to include consideration of the improvement of the fishery, the control of nutrients in the water and the protection water fowl in the scoping document. Thanks for the opportunity to comment. [redacted]
143	Logging is not restoration. Please see my attachments **[Attachment D; 494 KB]**
144	I would like to see RP help fund the purchase of undeveloped property fronting the Spokane River in CDA. This land would then be donated to a land trust e.g., (Inland Northwest Land Trust or Panhandle Parks foundation) and preserved as open space with some public trails. Two very prominent, contiguous parcels are currently available: 1. the old Atlas Mill site (7 acres waterfront parcel) 2. the old Stimson Mill site (50 acres) Acquiring and preserving a riverfront portion of both of these parcels as a connected open space "parkway" would be a nice "replacement" for land heavily damaged or contaminated in other areas of the basin. Either of these areas would also be a great site for a "nature center" - maybe with a small structure for an interpretive center for public education. Since it's within the City of CDA, it would get a lot of visibility and interest. So I hope this can be included as a goal as you develop the RP scoping plan Thank you.
145	Submitted by Kellogg, Wallace, Mullan and Kootenai School Districts During the public meeting held on August 20th, Mr. Cernera stated that while there had been significant cleanup achieved, a great deal of contamination remained in the Silver Valley and the potential for a health risk still persists. That being the case, the three Silver Valley school districts, and the Kootenai School District would like to request that following two potential proposals be consider in scoping the funding alternatives. PROPOSAL ONE For several years Panhandle Health had a nurse available for the school districts to caution our students about the potential hazards of lead poisoning. That service was discontinued a few years ago because of funding cuts. We would like to request one, or preferably multiple year, funding to support one school nurse to be shared among the four school districts to provide the following services. 1 Work with Panhandle health to monitor blood lead levels of our students. 2 Provide educational lessons to our students on the following topics. A. Proper hygiene behavior related to washing hands and playing in potentially contaminated dirt. B. Potential hazards of playing around settling ponds. C. Potential hazards of playing around mining dumps and mine waste areas. D. Potential hazards of playing around or entering abandoned mine shafts and drifts. E. Hazard of playing in potentially contaminated waterways.
146	PROPOSAL TWO There is a great deal of research that validates that nutrition, and particularly calcium, plays an important role in protecting the body against lead poisoning. We would like to request consideration be given to funding a free or discounted milk program for our less fortunate students that would help prevent lead poisoning by encouraging an increased consumption of milk.
147	I am a principal geochemist with a local environmental consulting firm, Prism Environmental Services, and I would like to present my proposal idea for a community-based educational research site for students to conduct pilot tests using approved materials & methods for environmental remediation field studies in the Upper and Lower Basin Areas of the Bunker Hill Superfund Site. I refer to this educational idea as RISER, Research Investigation Station for Environmental Remediation. I presented this RISER idea to EPA in Spring of 2013, and have received support for this proposal in EPA's recently released Lower Coeur d'Alene

	Basin Pilot Projects Proposal Matrix. NEEDS: As interest grows towards incorporating community outdoor programs and designing Green developments in local communities and regional cities, there should be more interest and opportunities to involve the local elementary and high school students as well as college and university students and faculty members to be able to participate in a field research station located on the margin of the Lower Basin of the Bunker Hill Superfund Site to help develop and implement innovative pilot studies in the field and help expand the knowledge and understanding of ongoing remedial activities. GOALS: PRISM Environmental Services proposes to aid in the process of locating and establishing a Research Investigation Station for Environmental Remediation (RISER) site that will operate in a manner based on the organized community gardens (i.e., Community Roots Program and Shared Harvest Community Garden in Coeur d'Alene) and educational outreach programs (i.e., University of Idaho Community Water Resources Program, IDAH2O, and University of Idaho Plant, Soils, and Entomological Sciences Department) established in towns and communities throughout North Idaho and the Pacific Northwest. This RISER station can be a place where bench-top studies performed in classrooms and laboratories can be physically implemented in the ground using native soils and waters for field-test studies at an established and secure pilot site. Other in-situ studies could involve collecting and propagating native seeds, wetland studies, aquatic species studies, and other innovative investigations. Pilot studies could be prepared by interested students and reviewed for approval by a RISER committee established by members from local organizations, including EPA, USFW, BLM, IDEQ, CDA Trust, PHD, CDA Tribe, NIC and UI. Land that is currently held by private individuals or state organizations (i.e., USFW, BLM) could be utilized to locate a property in a strategic area along the margin of the Lower Basin with convenient access and security to help establish this type of RISER facility. BENEFITS: Utilizing community outreach programs including UI Community Water Resources Programs and developing environmental partnerships could help gain interest in the community and provide grant funding opportunities through college scholastic programs and student internship opportunities currently available and attained in North Idaho. Students ranging from elementary age, to those earning advanced degrees at University level, to emeritus professors who have outlived their research projects could all benefit from observing and participating in a community-based environmental remediation research site. Furthermore, a wide range of diverse studies could be investigated at this proposed field research station located on the margin of the Bunker Hill Superfund Site.
148	To all of you on the Restoration Partnership Team- I'm so happy that this is moving forward! I know that multiple projects will occur over many years and you will be a part of getting them started. My only wish is that the RP will get to the root of problem areas and address those first. Many projects have treated symptoms of environmental damage, but not the cause. And don't re-invent the wheel! Much of what you'll be doing has been done before, either here or in other parts of the country. Give yourself the time to research the successful outcomes that others have done before you. It will save you time and money for more project work if you investigate past successes and failures. Good luck with your future endeavors; I know you'll be successful with whatever you tackle. [redacted]
149	After viewing the CdA and St. Joe River drainages, it seems to me that projects could actually be completed in the St. Joe drainage so I would favor starting there. As far upstream as possible for the first projects, e.g. Sherlock Creek.
150	Preserve the wetlands on Spokane River approximately 1.5 miles west of Coeur d'Alene Lake. The area below Foothills Drive has moose and Elk that use the wetlands. There are

	also ducks, eagles, osprey and many other water birds that use the area. The river otter also use the area to nurse their young.
151	Restoration of the waters (streams, lakes, rivers) should be upmost in priority. Good quality water insures the health of all the animals within the area as well as the health of individuals engaging in various water sports. I would also like to see good public access to the areas but without (or with very minor) influence on the natural beauty of the areas.
152	On behalf of University of Idaho Extension Northern District's Water Quality Outreach office, I would like to express wholehearted support for the mission and goals of the Restoration Partnership. I am the Area Water Educator, and it is my job to develop and deliver water-related educational programming and outreach efforts to the community. I am also tasked to lead scientific research projects in support of community needs vis-à-vis clean water. My background includes both natural sciences (Water Resources Management) and social sciences (Community and Regional Planning and Volunteer Management) and I can work in both sides of the "quantitative-qualitative" research world. My experience in ecological restoration includes being on the award-winning Karnowsky Creek Restoration Project with the Siuslaw Watershed Council, and the Project Manager for the Historic Coyote Creek Restoration Project (100+ acres) along Amazon Creek for the Long Tom Watershed Council. In this letter, I would like to outline the areas in which my office can offer support in terms of K-12 education, community outreach, and community-based research. All universities engage in research and teaching, but land grant universities have a third critical mission-extension. Land-grant institutions "extend" their resources, solving public needs with college or university resources through non-formal, non-credit programs. The Morrill Act of 1862 established land-grant universities to educate citizens in agriculture, home economics, mechanical arts, natural resources management, and other practical professions. Extension was formalized in 1914, with the Smith-Lever Act. I am eager to understand your outreach and environmental education goals and to work with you to develop educational programming and publications. Extension produces helpful publications for the public. These are peer-reviewed, official University documents that require scrutiny similar to that of academic journal articles, but are easier for the public to read. They are usually co-written by representatives from multiple agencies. I would very much look forward to publishing Go-To guides about restoration at the household scale and larger. More examples of Extension publications are listed in the University of Idaho Extension Publications and Multimedia Catalog: http://www.cals.uidaho.edu/edComm/catalog.asp?category1=Water%20Quality&category2=NULL. Extension also develops curriculum tied to community needs; in this case, the concepts at the core of the Restoration Partnership. Development of K-12 curricula that is tied to New Common Core and Next Gen Science Standards will make it easier get restoration science into the classroom, and more likely that teachers will use the resources that the Partnership provides to K-12 schools. In my experience, long-term impacts to public understanding of any social or natural system starts with teaching children the facts and values associated with these systems. That is, if you want to protect water, teach the kids the wonder and science behind water quality and aquatic organisms. My office can work with the Partnership to enrich education through diversity the University of Idaho is an equal opportunity/affirmative action employer to assemble curricula into useful lessons for teachers throughout the K-12. Extension- , water-, and restoration-oriented grants are available, such as the Integrated Research, Education, and Extension Competitive Grants Program-National Integrated Water Quality Program, the

Five-Star Restoration Program, 319 Grants, or even the Environmental Workforce Development and Job Training Grant program. Proposals are solicited that promote locally focused solutions to watershed scale water resource issues in agricultural, rural, and urbanizing watersheds. One way this might work is with my office applying for RFPs such as this, and adding Restoration Partnership funds as cash match. I will seek out other potential ways to leverage Restoration Partnership funding to get even more work and research done. I can do the heavy lifting of grant writing if the Partnership can commit to matching funds and doing the heavy lifting of project development. My connection to the Moscow Campus of the University of Idaho can be a valuable link to undergraduate and graduate academic programs. Through my 5-year Directorship of the Service Learning Center, I have strong ties with several pertinent University of Idaho departments, especially College of Natural Resources, Waters of the West, and Environmental Sciences programs. Undergraduate Environmental Science students often have service requirements. Through organizing service projects, we benefit from extra people doing hand-work, and the students benefit by learning from us, practitioners in the field. I can help to recruit graduate students who are trained in natural and social sciences to greatly increase the types of research projects the Partnership would like to pursue; think, "Mobile Graduate Community Research Corps." I have been involved in a project to develop this Mobile Graduate Corps, which can be tasked to follow some of the Partnership's research interests. Community-based research describes a process by which organizations or individuals within the community work with a faculty member to develop research questions and projects that are especially pertinent to the community. The faculty member facilitates finding answers for the community, which is different from the classic model in which the researcher drives all aspects of the research and publishes narrowly on the topic that most interests her or him. My training lends me to community-based research, and I would like to extend the offer to the Partnership to facilitate research with you. Research topics can include: ● Perceptions of restoration ● Community values assessment ● Content analysis of comments: o What are the foci? o Common areas of interest. Gaps in ideas or concerns. Development of interviews to follow up with comment providers. o Geographic extent of comments; where is the message getting to... and where is it not? ● Perceptions of restoration o How do people value restoration before... o and after learning about restoration science? ● Risk v. Value of economics of recreation and natural resource harvest, o As compared with risk v. value of restored ecosystems o Value of recreational use and ecosystem services. As the program administrator and P.I. for the IDAH2O Master Water Stewards volunteer Water quality monitoring program, I would like to extend the services of our volunteers in support of the Partnership's needs. I envision providing water quality monitoring training to volunteers to help track changes over time associated with the restoration sites. Volunteers can also be very helpful with plantings and assisting with community outreach and education. According to Independent Sector volunteer hours can be a component of an in-kind match, valued at $22.14/hour (Idaho's value of a volunteer hour is $16.13). The IDAH2O program maintains a list of volunteers and others who are interested in water quality. The IDAH2O program is in need of funding, and is always looking for funding and work partnerships with which to grow. We will be happy to send information and volunteer assistance needs out to the list at any time. I served on a National Federal Advisory Committee between December 2011 and May 31 2013 to develop the 21st Century Service Corps. These corps facilitate conservation service work on public lands and encourage a new generation of natural resource managers and environmental scientists. Through the 21CSC America's young people play a key role in: ●

	reducing the impacts of climate change on our natural resources, ● empowering Native American communities, ● building trails, ● enhancing wildlife habitat, ● improving and restoring our cultural and historic landmarks. I think that developing a Restoration Service Corps could help reduce labor costs with handwork and also increase the Partnership's educational role in training young people about the science behind ecological restoration. My involvement with the 21CSC FACA has provided me some helpful insights into applying for being a 21CSC host. Having been involved in ecological restoration in former professional roles helps me to understand how important hand crews are to certain components. In conclusion, the North Idaho Water Quality Extension Office would like to extend wholehearted support for the Restoration Partnership in a number of areas. Sincerely, [redacted]
153	I would like the Restoration Partnership to support the development of a Coeur d'Alene Basin watershed research and nature education center. Its purposes would be to coordinate and oversee projects funded by the Restoration Partnership while educating the public about them and other environmental issues. The watershed research center's purposes would be to compile information and conduct studies related to Coeur d'Alene Basin's remediation and restoration, initiate projects and programs, and provide a place to educate the public about protecting water quality through watershed management. This management would include working cooperatively with the public, local businesses, the Coeur d'Alene Tribe, and municipal, county, state, and federal governments to adopt protective land use practices, preserve critical habitats, and maintain forest health. The community nature center's related purposes would be to educate the public, and especially children, about the hydrologic cycle in the Coeur d'Alene Basin, nature's dependence on it, Native American's historic and cultural ties to the Basin, past detrimental practices, current watershed problems and remedies, and future solutions. In addition, the center would offer programs on other aspects of the natural world so that future generations would learn about nature's complexity and maintaining environmental health. In short, I suggest leveraging and extending the effectiveness of the Restoration Partnership's effort by establishing a permanent institution that will carry on the remediation work and increase public awareness of the environment. If funded by the Restoration Partnership, where could such a project be built in the Coeur d'Alene Basin? There are a number of locations near or on the rivers or lakes. Ideally, the property would be easily accessed and provide a substantial building site, hiking trails, and riparian habitat. Currently, the old Atlas Lumber site on the Spokane River is for sale. A large log house is also for sale at the head of Cougar Bay. Or, perhaps, open land could be purchased and a center built. Who would support this project? In looking into the possibilities of building a community nature center over the past few years, I talked to the Bureau of Land Management, the Coeur d'Alene Tribe, and The Nature Conservancy. Through those discussions I learned the Tribe is interested in developing a watershed education center. I envision many potential partners, including the US Forest Service, US Fish and Wildlife Service, Bureau of Land Management, Environmental Protection Agency, Idaho Department of Environmental Quality, Idaho Fish and Game, the Basin Commission, municipal governments, Benewah, Kootenai and Shoshone counties, and the University of Idaho Extension Water Quality Program. On the private side, I foresee support coming from the Coeur d'Alene Tribe, various chambers of commerce, local businesses and corporations, environmentally focused nonprofit organizations, and the public at large. The watershed research and remediation part of this project might be overseen by a partnering consortium composed of regulatory agencies, local governments, universities and colleges, nonprofit groups, and public representatives. Its mission would be

	to gather and evaluate watershed information, prioritize problems it reveals, make decisions and carry out remedial actions. The educational nature center component of this project might be managed by a nonprofit organization. Rural Kootenai Organization, a 501 (c) (3) organization qualified to manage a community nature center, is currently looking for a site and could be a partner in this effort. Kootenai Environmental Alliance, Idaho's oldest environmental organization, fully supports this proposal and is willing to be a secondary partner in this project. How would the project take place? First, the building and land or land would be located and bought. If land alone is purchased, a building would be designed and constructed. Simultaneously, a publicity campaign and program development effort would be conducted so that public support and attendance would occur. The Association of Nature Center Administrators (www.natctr.org) provides a service for assessing nature center sites and providing a comprehensive plan to create and operate such centers. What would this combined Coeur d'Alene Basin watershed research and nature center cost? My estimate is 3 million dollars. This would include acquiring land, building and staffing the facility, developing programs, and establishing an operating budget. My estimate is based on my knowledge of the price of large acreage land near water, building costs, and facility operating budgets. When would the center open? I estimate this center would open within five years. Why is such a center needed? The Coeur d'Alene Basin's inherited environmental problems will not be easily remedied and will need ongoing involvement provided by an established institution. As new problems emerge, a permanent organization needs to coordinate remediation responses and educate the public. In addition, young people would be directly connected to the natural world so they learn about and care for it. This center would educate them and promote stewardship. Below, I have included information on two similar projects--the Northern Great Lakes Visitor Center in Ashland, Wisconsin and the Chesapeake Bay Environmental Center. The Great Lakes Center's Mission, Vision and Goal statements are included as well as contact information for both projects. Our Mission The Northern Great Lakes Visitor Center helps people connect with the historic, cultural, and natural resources of the Northern Great Lakes Region through customer-based information, services, and educational programs. Our Vision The Northern Great Lakes Visitor Center will be a leader in advancing the sustainability of the region's cultural, historic, and natural resources through innovative partnerships that engage people and communities in positive change. Our Goal The Northern Great Lakes Visitor Center's goal is to be a leader and partner in delivering regional education, information and tourism services. Partners in the Northern Great Lakes Visitor Center include the US Forest Service, National Park Service, US Fish and Wildlife Service, Wisconsin Historical Society, Northern Lakes Visitor Center, and the University of Wisconsin Extension Service. More information may be found by googling Northern Great Lakes Visitor Center or going to its website: http://www.nglvc.org. The Chesapeake Bay Environmental Center promotes environmental education, restoration, and recreation. Contact http://www.bayrestoration.org for more information.
154	As an addendum to Kootenai Environmental Alliance's previously submitted comments to Restoration Partnership: With the amount of mediation and restoration that has and will be happening in the Coeur d'Alene Basin, KEA supports the development of a Coeur d'Alene Basin watershed research and nature education center. Its purposes would be to coordinate and advance the projects funded by the Restoration Partnership while educating the public about them and other environmental issues. The full details of this project proposal was submitted to Restoration Partnership by Coeur d'Alene citizen, [redacted]
155	1. County and Forest Service Roads Maintenance Fund Narrative: One of the most valuable

	natural resource that exists in the Silver Valley is the surrounding forest. As the roads into the forest deteriorate, access to the forest and its valuable attractions (campsites, rivers, creeks, lakes, trails, etc.) becomes increasingly more difficult. The Cooper Pass road to the Glidden Lakes is an example. The road had little or no maintenance for the past number of years. Accessing these lakes needed a four wheel drive or ATV up a very rough road. With the upgrade of the power line poles the road was repaired and access has been opened up. Keeping the road in good shape from now on would help keep the access to these lakes open. Therefore, I suggest that a good amount of money (two to three million) should be invested in a fund that would yield annual returns that could then be used to maintain roads. Rules of use and decisions about which roads to maintain would have to be established. However, as long as the principle was not spent, a continuous source of funding could be use to keep the roads in good working order.
156	2. Develop and restore the south fork of the Coeur d'Alene River through Wallace. Narrative: The CDA River now runs through Wallace contained in a canal-like structure. The east end runs under the street and I am not sure much can be done. However, from approximately behind the Depot, a graduated access could be built. Boulders could be brought in to create a kayak course and provide fish habitat. I believe Missoula and Boise have developed the rivers, so examples are readily available. Communities that have emphasized their rivers and creeks provide an enriched environment. Other sections of the river could also benefit from some development as well. Similar treatments west of Wallace should also be considered.
157	3. Look at Small Town Gems May I also suggest that your committee look at the website www.smalltowngems.com. The website lists criteria the site uses to evaluate small towns. Helping the Silver Valley communities to achieve some of these characteristics would help the cultural and economic values in these communities. **[Attachment E; 52 KB]**
158	Provided are comments submitted by the Coeur d'Alene Tribe's Fisheries Program regarding scoping input for development of the Coeur d'Alene Basin Restoration Plan. Mining releases injured native westslope cutthroat trout (WCT) populations, and the habitats on which they depend, in the Coeur d'Alene Basin (Basin). As a result, we support mitigative measures that would increase the production of WCT throughout the Basin. Specifically, we would like to see restoration efforts prioritized in those locations and habitats that would most benefit the adfluvial, migratory life-history form. Adfluvial cutthroat trout rear as juveniles for a couple years in stream habitats where they were spawned, but then move downstream to Lake Coeur d'Alene to grow and mature as adults. The adfluvial variant is considered biologically important because 1) It is a unique life-history strategy that is not prevalent across the range of WCT; and 2) It confers a degree of resilience to the overall meta-populations structure in the Basin given that a source of colonizing adults exists in the lake to buffer against localized disturbances that can periodically impact stream environments and the WCT populations therein. Furthermore, the adfluvial variant, which rears in the more productive lake environment, can attain on average larger adult sizes than stream-resident WCT, and consequently has potential to provide more harvestable biomass to a fishery. A comprehensive strategy designed to support recovery of adfluvial WCT in the Basin would need to identify watersheds that would have the potential for supporting robust populations. As an initial step, this would likely entail developing a plan to prioritize where these watersheds would be located spatially in the Basin in relation to other watersheds that are currently being managed to recover adfluvial populations. We would propose ensuring that watersheds targeted for recovery actions are spatially distributed

across the entire Basin. For example, Benewah Creek at the southern end of the Basin and Lake Creek at the western side of the Basin are two watersheds that are currently being addressed the Coeur d'Alene Tribe's Fisheries Program with stream restoration measures to recover WCT. However, the northern half of the lake has yet to receive any substantial restoration measures designed to target WCT recovery. Mica Creek and Cougar Creek in the northwest sector, Wolf Lodge Bay and Beauty Bay in the northeast sector, and Carlin Creek on the east side could all be potential candidate drainages. Pilot feasibility assessments could then be conducted for these candidate drainages in which coarse-scale features would be examined to determine the likelihood that a drainage could support WCT. Information obtained from GIS analyses (e.g., watershed size, channel gradient, predominant land use coverages) would be instrumental in aiding these coarse-scale analyses in addition to obtaining anecdotal or published evidence for an extant adfluvial population. Similar pilot scale assessments were conducted by the Tribe's Fisheries Program during the early 1990s when drainages within the reservation were prioritized for candidacy to receive WCT recovery measures. Fish sampling across reaches in selected drainages could then be conducted to provide a coarse-scale description of the spatial distribution and relative density of WCT in addition to providing data on the probability for an extant adfluvial life-history variant. Genetic samples (e.g., fin clips) from WCT encountered during these surveys could be collected and analyzed to determine the inter-relatedness of fish across the various drainages surveyed (a similar analysis to this was conducted by the Tribe's Fisheries program in 2009 in Benewah, Lake, and Wolf Lodge creek drainages). Genetic analyses that indicate similarity of genetic signatures across drainages (i.e., lack of reproductive isolation) provide evidence for exchange of individuals among the drainages which in turn lends support for evidence of migratory, adfluvial variants. Other survey techniques could also be used to evaluate the likelihood of an adfluvial population. For example, hook and line sampling could be conducted at tributary junctions during early spring when large, adfluvial adults are migrating upstream from the lake to access spawning grounds. Selection of a drainage and strong evidence for the existence or potential for a adfluvial WCT population in that drainage could then lead to a more detailed assessment of impaired habitat conditions in that drainage that are limiting the recovery of WCT. Assessments like these have been conducted by the Tribe's Fisheries Program (e.g., a large wood recruitment and inventory analysis in 2008, a road condition and fish passage analysis in 2009) to examine factors-such as barriers to movement, lack of wood forced pools, and sediment delivery issues-that are impacting adfluvial WCT in Lake and Benewah creeks. These assessments have been essential toward the development of a structured, restoration framework that prioritized and outlined project-level actions in tributaries of Lake and Benewah creeks that would most benefit WCT populations and their habitats. Finally, recovery of adfluvial WCT across the Basin will not only depend on implementation of reach scale projects in streams to address degraded habitat conditions, but also requires managing rearing conditions in the lake that may be impacting WCT. The Tribe's Fisheries Program has found that survival rates of juveniles that are rearing to adulthood in the lake are substantially lower than those that have been documented for other adfluvial populations in comparable systems. Though the mechanisms that are contributing to these low survival rates are largely unknown, the Fisheries Program recently funded a study to examine the consumptive impacts of two non-native piscivores, northern pike and smallmouth bass, on WCT. Information from this study (a report is expected by the end of 2013) will be instrumental in developing strategies to manage both native and non-native fish species in the lake. We encourage the CDA Basin Restoration Plan to support

	management actions taken by the Tribe and its Fisheries Program that will improve our understanding of species' interactions within the lake's fish assemblage and that will ultimately increase in-lake survival rates of WCT.
159	The Community Water Resource Center, located at University of Idaho Coeur d'Alene, provides a physical outreach facility and laboratory to serve diverse regional stakeholders. Understanding priorities for these stakeholders, particularly with respect to research and policy issues is an important goal for the CWRC. In addition, the Center aims to identify and address gaps in understanding that will promote water quality for the region. These discussions indicate, perhaps not surprisingly, that data is at the very heart of water issues in our region. Critical analyses of existing data sets, cross referencing of disparate datasets, collation and association of metadata, and data visualization and modeling are all needed to improve efficiency and to coordinate water quality efforts. To address these acute needs, the CWRC proposes a project that would federate, annotate, manage, and make readily available relevant water quality data in areas of interest to The Restoration Partnership. The Center will also access expertise to develop tools for evaluation of specific locales that can enable restoration program project prioritization. Integral to CWRC efforts in this regard is the Consortium of Universities for the Advancement of Hydrologic Science, Inc. CUAHSI has developed a Hydrologic Information System (HIS) that supports sharing of hydrologic data through web services and tools for data discovery and access, and for metadata management. One of the components of this system is a HydroServer, which collects databases, web services, tools, and software applications to allow data producers to store, publish, and analyze space-time hydrologic datasets. The HydroServer at the University of Idaho is incorporated into the Northwest Knowledge Network. NKN also provides related development and maintenance capabilities and services to collect, visualize, store and automatically backup data. In this case, the robust and redundant NKN infrastructure will facilitate standardized monitoring of water quality throughout the duration of restoration efforts in the Coeur d'Alene Basin. Further, NKN will facilitate curation, discovery, and sharing of relevant data by implementing the ISO 19115 Metadata Standard for cataloging of scientific datasets.
160	We welcome the opportunity to provide once again critical input for consideration of the protection of the natural resources of the CD'A Basin Superfund site cleanup. Of primary concern for the protection of all the natural resources connected to the lead and heavy metal contamination are the repositories being constructed in the upper Basin area. None deserve greater attention than the Old Mission waste repository that is leaching pollution into the groundwater and downstream to the tributaries of the Coeur d'Alene River before emptying into the Spokane River. Two more repositories in addition to the 5 or 6 already in place are being built on the banks of the river or in neighborhoods. We ask that the input of more than 3000 citizens and 75 national groups who have provided data and input to shut down these repositories be seriously listened to. It is a known factor that repositories are sources of continued pollution that will render any downstream natural resource cleanup futile unless they are stopped. Permanent waste technology is available through the EPA, but the deliberate disregard of the agency disallowing discussion of this technology is in the control of Region Ten, EPA. Animals, swans, wild potatoes and other defined natural resources are important in the restoration that must take place, however, even more critical and with utmost disregard are the lives of children, those who live in, recreate, visit the Mission of the Sacred Heart, the Old Mission, a National Historic Landmark who are not even being told of the exposure of lead. Children who live in the CD'A Basin are lead

	poisoned every day, they are also our greatest natural resources. **[Attachment F; 396 KB]**
161	We ask for support for funding for the Silver Valley Community Resource Center's Community Lead Health Clinic that has been carefully designed with the help from the nation's renown lead experts, Universities, affected citizens and medical providers in order to bring relief to those whose lives have been damaged. In doing so such actions will be in line with the decisions stemming from the Dept. of Justice and Judge Lodge who made the comments that projects such as the CLHC would have another opportunity to receive just share of the millions of settlement dollar funds. It is time for those who sacrificed their lives and continue to do so receive some justice. We ask that you take these comments be entered into the public record and they be taken seriously.
162	I believe there is great potential to restore the damaged watersheds of both the South and North Fork of the Coeur d'Alene River. The Coeur d'Alene Ranger District has the highest road density of the National Forest system, which means lots of culverts need to be replaced, roads moved out of riparian areas, and sediment sources stopped. This would help reduce peak flows and keep more water in the upper watershed - thereby reducing the metals that are mobilized further downstream. Many riparian areas need to be planted, meanders put back in and beaver returned. This could be done by a local trained workforce and would be a great investment and opportunity.
163	Second, the acidic soils in and near some of the mine sites could be mitigated with the use of biochar. Experiments taking place at Oregon State and the USDA Agricultural Research Service on mined sites are proving this out. Locally biochar can be obtained from Farm Power in Rockport, Washington
164	SCOPING PROPOSAL FOR RESTORATION PROJECTS During the public meeting held on August 20th, a representative of the Realty Industry testified that she was having difficulty selling a property that was part of the superfund that had not been remediated. There is an abundance of evidence that the Superfund designation has and continues to damage our economy. Because the Superfund Designation is the result of the mining activities, there is a direct connection between past mining activities, the Superfund Designation, and our economy. Equally important to resorting damage done to the environment is restoring the damage done to our economic viability. It relates to the old adage "Give a man a fish and he eats for a day. Teach a man to fish and he can eat for the rest of his life. Helping this community rebuild the tarnished "Superfund" image would go a long way toward helping our communities survive. Therefore, I would request strong consideration be given to providing funding toward repairing our tarnished "Superfund" image and making the Silver Valley once again a popular and target destination. [redacted]
165	Having lived at the mouth of Mica Creek since 1984 we are more than aware of the restoration needed in the creek and the bay. Our dog used to roll in spawned out fish and came home smelling so very lovely. Before the creek was silted in, there were abundant fresh water mussels. It would be so very wonderful to set the clock back 30 years and undo recent damage. We would be happy to assist and become involved in any of the Restoration Partnership projects. Let's fix our most precious resource!
166	Was delighted to hear that the tribe is planning on using its settlement from the mining company to attempt remediation and restoration of our beautiful Lake Coeur d'Alene and its watershed. The damage done to Mica Creek and the sedimentation of the delta at Mica Bay caused by the holding pond failure during Hwy 95 construction would be a wonderful use for some of these funds. We miss the wildlife and fisheries that were destroyed by the deluge caused by that failure. Sand and gravel in the stream bed have been covered by silt

	from the catastrophe, and the spawning grounds here have become unattractive to our fish friends. Lets give them another chance!
167	As a 30 year property owner on Mica Creek, we have always been concerned with riparian issues of the creek and the bay as regards sediment loading. We currently have a 319 grant to stabilize portions of the lower reach of Mica Creek into Lake Cd'A hoping to continue with several phases over the next 10 years. We are currently working with adjacent land owners to prevent further catastrophic bank failures and hopefully restore our lost fisheries and reduce sediment loading into the bay. We are on your team and look forward to the opportunity to work with you on remediation and restoration of our beautiful watershed.
168	I worked for the Forest Service on the Idaho Panhandle National Forest my whole career in watershed management. I think that this is a fantastic opportunity to implement sound restoration in the Coeur d' Alene Basin. I hope that these projects are carried out in the most prudent way and that you validate the fact that all restoration be monitored for their effectiveness. I have seen many projects throughout my career that were a waste because of politics and the fact that people really didn't know what they were doing because of a lack of experience when it comes to dealing with river restoration. Follow up monitoring is very important in validating the effectiveness of restoration. Hopefully, you will have a cadre of qualified and certified individuals that will see this through and to ensure that the job is done right.
169	A basic goal or principle of the restoration program should be that the program emphasis is to "restore public natural resource values that have been damaged" where cost effective and practical. As the natural resource values are restored, the priority is to do the restoration should be on areas that the public have and will continue to have access to and can be protected and maintained... The settlement for the NRDA efforts was for restoration of public values. The final efforts focused on quantifying some of the natural resource values but the largest value that was examined was for the lost use by the public for the use of the water and land, and the recreational use of lands and waters. The largest value lost was the public use of the area and natural resources, therefore the restoration efforts need to ensure the public use is enhanced and maintained to have access to the natural resources and lands within the basin.
170	The funds that are held for cleanup that the natural resource agencies can direct should be used to ensure that the state and federal lands be cleaned up to ensure the public can safely access and enjoy the public lands. Restoration of lands for long term natural resource values on public (government owned and controlled) should be first priority.
171	Restoration should be prioritized first in the Coeur d'Alene River and Lake Basin or next within the St Joe River and Spokane River Basin.
172	The development, implementation and oversight of the restoration efforts should be coordinated and assisted with local natural resource, conservation and environmental agencies and organizations. The restoration efforts effort should complement and assist the local efforts to improve water quality, soil and water conservation, and fish and wildlife improvement programs. The restoration program should assist the local public efforts of the Watershed Advisory Groups, 319 efforts, the soil and water conservation districts, the Natural Resources Conservation Service programs and Idaho Department Fish and Game programs.
173	The cleanup and restoration needs to be done sooner and not delayed for the future.
174	Monitoring and studies need to be restricted and limited to basic needs and reviewed for effectiveness.

175	The program needs to be cost effective and attempt to get the most value for the funds... The funds should be leveraged with other local efforts and use local input and knowledge. Efforts need to be done cost effectively and studies need to be limited... Overhead should be limited and the resources of the local agencies and organizations should used where possible. In summary the restoration program efforts need focus on the basin's public values and lands and use the existing local agencies and organizations knowledge and resources.
176	I thank you for the opportunity to respond though I am a day late. The CdA river and lake has been very special to me over the last 12 plus years. Work, play and recreation opportunities have been great, something different on every trip. This area is my fall back place when I am not travelling elsewhere. I would like to see the Cda River left open to boating at reasonable speeds so that water sports are still an option and for boating runs to Cataldo on that special day in August. This would have to be balanced with fish, wildlife, and habitat/shoreline needs. If it is possible to do this it would be great for many users like myself. Good job to you on all of this work, [redacted]
177	The U.S. Environmental Protection Agency has reviewed the Forest Service (FS), Bureau of Land Management (BLM), and Fish and Wildlife Service (FWS) Notice of lntent to prepare a Restoration Plan/Environmental Impact Statement (EIS) for the Coeur d'Alene Basin in Kootenai, Shoshone and Benewah Counties, Idaho. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. In offering these comments, we also recognize and value the close working relationship the EPA has had with Natural Resource Trustees over many years. According to the Notice, the FS, BLM and FWS are proposing to assess potential impacts associated with a plan to restore injured natural resources and services due to long time releases of mining related hazardous substances in the Basin. Mining activities occurred along the South Fork of the Coeur d'Alene River and tributaries and discharged wastes in these waterways and surrounding areas, causing loss, injury, and/or destruction of natural resources due to metals such as lead, zinc, cadmium, arsenic and other toxic substances in the waste. Cleanup and identification of contaminated sites is ongoing by EPA under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or "Superfund"). The proposed plan and related activities would restore, replace, rehabilitate, or otherwise compensate to fully mitigate impacts to resources. The EPA is also the federal representative on the Basin Environmental Improvement Project Commission and technical advisor on other issues including environmental cleanup and restoration. As such, our primary interest in the proposed action is a clear indication that cleanup and restoration actions in the Basin will result or maintain conditions that are protective of human health and the environment. The EPA supports the overall goals of the proposed plan to restore injured natural resources within the Coeur d'Alene Basin and analyze this action's potential impacts under NEP A. Because of the extent of the planning area and programmatic nature of the proposed Restoration Plan, the draft Plan/EIS should clarify whether or not it would serve as a comprehensive planning framework that would guide development of future individual restoration plans and projects. These plans/projects tiered to the Plan/EIS should be subject to separate NEPA analysis and review to ensure issues specific to each subsequent action can be fully analyzed and mitigation measures identified. The Restoration Plan should also prioritize actions to address impacts to resources within the

	Coeur d'Alene Basin as opposed to mitigation offsets outside of the Basin. As the Notice of Intent does not identify issues and resources to address in the proposed Restoration Plan!EIS, we offer the following scoping comments to inform the FS, BLM and FWS of topics that we believe are important to address in the NEPA analysis. We appreciate the opportunity to participate early in the proposed planning effort and look forward to our continued coordination and involvement as both the CERCLA cleanup and restoration work moves forward. If you have questions about our comments, please contact me at [redacted]
178	Range of Alternatives: The EIS should include a range of reasonable alternatives that meet the stated purpose and need and that are responsive to the issues identified during the scoping process. The Council on Environmental Quality recommends consideration of all reasonable alternatives, even if some of them could be outside the capability or the jurisdiction of the agency. To the greatest extent possible, quantify potential impacts of each alternative and, in a comparative form, present each alternative's impacts. It would also be useful to list each alternative's impacts and corresponding mitigation measures. The EPA encourages selection of feasible alternatives that will minimize environmental degradation.
179	Environmental Effects: The EIS should include environmental effects and mitigation measures. This would involve delineation and description of the affected environment, indication of impacted resources, the nature of the impacts, and mitigation measures for the impacts. The following topics are of particular interest to the EPA.
180	Water resources impacts: Water quality degradation is one of the EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the State of Idaho and Tribes with approved water quality standards to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet the state and tribal water quality criteria and beneficial uses. Thus, the EIS should disclose which waters may be affected, the nature of potential impacts, and specific pollutants likely to affect those waters. The document should also report water bodies within the Coeur d'Alene Basin that are listed on the State and any affected Tribe's most current EPA-approved 303(d) lists, describe existing restoration and enhancement efforts for those waters, how the proposed action will coordinate with on-going protection efforts, and any measures to avoid further degradation of water quality within impaired waters.
181	The document should also indicate how the proposed restoration plan would meet anti-degradation provisions of the Clean Water Act that prohibit degrading water quality standards within water bodies that are currently meeting water quality standards. Public drinking water supplies and/or their source areas often exist in many watersheds. Source water areas, therefore, might exist within the Coeur d'Alene Basin. Source water is water from streams, rivers, lakes, springs, and aquifers used as a supply of drinking water. The 1996 amendments to the Safe Drinking Water Act require federal agencies to protect sources of drinking water for communities. If the proposed restoration plan would affect drinking water, then the analysis of its impacts should identify all drinking water sources, any potential contamination of these sources that may result from projects under the plan, and measures to take to protect these sources.
182	Groundwater extraction, land disturbance related to construction activities, material transportation and storage, waste disposal, inadvertent chemical or hazardous liquid spills,

	and compaction produced by vehicular traffic, use of existing and new access roads, and other facilities may compact soils and change hydrology, runoff characteristics, and ecological function of sites, affecting flows and delivery of pollutants to water bodies. Therefore, the EIS should include a detailed discussion of potential cumulative effects from the proposed action on the hydrologic conditions of the Coeur d'Alene Basin and vicinity. The EIS document should clearly depict reasonably foreseeable direct, indirect and cumulative impacts to groundwater and surface water resources. For groundwater, the EIS should identify potentially affected groundwater basins and any potential for subsidence, and analyze impacts to springs or other open water bodies and biological resources. This is especially important for the proposed action due to groundwater contamination in the Basin e.g., in the Osburn and Kellogg areas. Please note that, under the Clean Water Act, any project construction that would disturb a land area of one or more acres requires the National Pollutant Discharge Elimination System (NPDES) permit for potential discharges to waters of the US. If restoration activities would disturb that acreage, they would need the NPDES permit, documentation of consistency with applicable storm water permitting requirements, and specific mitigation measures to reduce adverse impacts to water quality.
183	Roads and their use Roads and their use also facilitate sediment transport to streams, increase habitat fragmentation and wildlife disturbance, as well as invasive plant infestations. Roads also interrupt the subsurface flow of water. Thus, the EIS should include data on existing and anticipated new roads, change in road miles and density due to restoration projects, and predicted impacts to water quality by roads.
184	Wetlands, floodplains and riparian areas The EIS should describe all waters of the U.S., including wetlands, that could be affected by restoration projects, and include maps that clearly identify all waters within the analysis area. It should also include data on acreages and channel lengths, habitat types, values, and functions of these waters.
185	If the projects would result in impacts to aquatic resources, then FS, BLM and FWS should work with the U.S. Army Corps of Engineers to determine if projects would need a Clean Water Act §404 permit. If a permit is required, the EPA will review the project for compliance with Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230), promulgated pursuant to Section 404(b) (1)of the Clean Water Act ("404(b) (1)Guidelines"). Any permitted discharge into waters of the U.S. must be the least environmentally damaging practicable alternative available to achieve the project purpose. The EIS should include an evaluation of project alternatives in this context in order to demonstrate the projects' compliance with the 404(b) (I) Guidelines. If restoration activities would involve discharges to waters of the U.S., then the EIS should include actions to reduce and mitigate resulting impacts.
186	Please note that activities affecting floodplains are also regulated under the Clean Water Act §404 and Executive Order 11988, Floodplain Management. The EIS, therefore, should include information explaining anticipated activities in floodplains, alternatives considered, and steps taken to reduce impacts to floodplains. The EIS should identify whether any restoration activity would be within a 50 or I00-year floodplain and discuss appropriate mitigation approaches. Floodplains perform a vital function of conveying and dissipating the volume and energy of peak surface runoff flows downstream. Thus, periodic flood flows form and sustain specific habitat types such as wetland and riparian areas within floodplains. As such, it is important to preserve unimpaired flood flows and prevent flood-

	related damage to downstream resources.
187	Executive Order I I990, Wetland Protection also requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. For a better understanding of existing functioning of riparian and wetland habitats in the Basin, a baseline assessment of those habitats may be necessary. One tool to help with that assessment is the Regional Guidebook for Applying the Hydrogeomorphic Approach to Assessing Wetland Functions of Riverine Floodplains in the Northern Rocky Mountains1
188	The EIS should also evaluate measures to reestablish the dynamics of the river system. For example, modifying some flood control structures could allow the river to more readily access portions of the floodplain and could allow natural channel reconfigurations. Such changes could provide some of the natural conditions e.g., thalweg realignment, that would help to restore the biotic communities in the aquatic ecosystem.
189	Mining activities and impacts The Restoration Plan/EIS should discuss mining in the basin (past and present), its impacts and affected resources, and how the proposed Plan would coordinate with operators to minimize impacts related to mining wastes and release of contaminants to the environment. The EPA has interest in and concerns with the matter of mineral leasing on public lands due primarily to our responsibilities under the Clean Water Act and other statutes, particularly those concerned with the permitting of discharges of wastewater from mining facilities to waters of the U.S. and cleanup of environmental contamination. Accordingly, the EPA would be interested in data on: • Location and extent of mineral resources in the Basin; • Past, current, and predicted level of mineral extractions; • Past and current direct, indirect, and cumulative impacts of mining activities on the human environment; • Potential conflicts with other resource management and uses e.g., recreation, energy development, special biota and fauna, and others; • Applications for new and expansion of existing mineral withdrawals and their potential impacts; • Mitigation measures for the impacts and monitoring plans. In particular, the mining impact studies and assumptions should include a discussion on adequate financial assurance for mining activities in the basin to ensure reclamation and maintenance of mining sites would achieve reclamation goals and post-mining land use objectives. The discussion should also indicate the process used to establish reclamation cost estimates, public disclosure and involvement.
190	Hazardous materials Based on information in the Notice Of Intent, restoration activities will likely encounter contaminated sites within the Basin due to past activities and other sources. While many of the sites are subject to ongoing Superfund Site Investigations and Cleanup, others might not fall into that category. Therefore, there is need to coordinate restoration activities with the EPA and the Idaho Department of Environmental Quality as contaminated sites are identified and cleaned up under EPA's Records of Decision. The EIS should acknowledge Superfund actions and plans for the Basin, describe contaminants of concern likely to be encountered and their effects, and include detailed information regarding specific measures to reduce or avoid impacts associated with potential disturbance of contaminated sites and

	any subsequent release of hazardous substances to the environment due to restoration activities.
191	If restoration projects in the analysis area would involve use of pesticides and herbicides, then the EIS would need to address any potential toxic hazards related to the application of the chemicals, and describe actions to take to minimize release of toxic substances into the environment and subsequent impacts.
192	Habitat, Vegetation, and Wildlife During implementation of restoration projects, clearance of vegetation and movement of soils may be necessary e.g., when building new access roads and other facilities. The projects, therefore, may have impacts on fish and wildlife habitat, and habitat connectivity. Because of that, the Restoration Plan/EIS should describe the current quality and quantity of habitat in the Basin, its use by fish and wildlife near restoration areas, and identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation. If projects would impact fish and wildlife, aquatic, and terrestrial habitats significantly, then the EIS should include mitigation measures to reduce the impacts. Habitat fragmentation is one example of impacts that may occur and that can result in significant edge effects that favor some species over others. In cases of linear infrastructure such as roads or utility corridors, the edge effect can be reduced through maintenance of canopy connection above roads or elevating the linear infrastructure e.g., power lines above the vegetation. The EIS should discuss critical habitats for species; identify impacts on species and their critical habitats by restoration projects; and how the projects will meet all requirements under the Endangered Species Act.
193	The EIS should include a mitigation plan with detailed steps to take to reduce or eliminate adverse impacts. For example, we recommend replacement trees be planted to offset any unavoidable tree loss. Plant replacement trees close to where the loss occurred and if practicable, use native saplings at a minimum ratio of 1:1. Mitigation might also include assisting county, state, and tribes with ongoing or planned forest or tree reclamation projects in affected watersheds.
194	Because the project may have impacts on native and rare plants, the EIS should include their locations and actions to manage their sites to reduce impacts on the plants.
195	During implementation of restoration projects, blasting may be required in some areas and may result in increased noise and related effects to local residents and wildlife. The EIS should discuss blasting needs, methods, and control of effects, and mitigation of impacts. There should be no placement and storage of blasting equipment and materials or excavation in sensitive areas. The timing of site activities should also be planned so that there would be little to no impacts to plants and animals during crucial seasons in their life cycle. The EIS should specify Best Management Practices to follow to protect resources.
196	Noxious Weeds and Invasive Plants Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. New roads, for example, can become a pathway for the spread of invasive plants. If possible, a vegetation management plan should be prepared to address control of such plant intrusions. The plan should list the noxious weeds and exotic plants that occur in the Basin. In cases where noxious weeds are a threat, we recommend the document detail a strategy for prevention, early detection of invasion, and control procedures for each species. Early recognition and

	control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have adverse impacts on biodiversity and nearby water quality. There are a number of prevention measures available such as reseeding disturbed areas as soon as possible and cleaning equipment and tires prior to transportation to an un-infested area. Plant seeds can be carried from a source area by the wind, wildlife, on equipment tires and tracks, by water, and on the boots of workers, so care should be taken to implement control procedures in all source areas to avoid spread to unaffected areas. Executive Order 13112, Invasive Species mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological and human health impacts that invasive species cause.
197	Air Quality Impacts The EIS should address air quality protection. The types of fuels to be used during restoration activities, increased traffic during operations, and related Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NOx) emissions should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities and ongoing operation of roadways are important concerns. The EIS should evaluate air quality impacts, and detail mitigation steps to take to minimize impacts. This analysis should also address and disclose restoration projects' potential effects on all criteria pollutants under the National Ambient Air Quality Standards, including ozone; visibility impairment, and air quality related values in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health. If, during restoration projects, there would be burning of vegetation, then the EIS should include a smoke management program to follow to reduce public health impacts and potential ambient air quality exceedances.
198	Endangered Species Act (ESA) Restoration activities, such as those involving vegetation clearance or earth moving may impact endangered, threatened or candidate species listed under the Endangered Species Act, state sensitive species and their habitats. The EIS should identify species under ESA and other sensitive species within the Coeur d'Alene Basin. This evaluation should also describe the critical habitat for the species; identify impacts restoration activities will have on the species and their critical habitats; and how the projects will meet all requirements under ESA.
199	Recreation and Access The EIS should analyze and report impacts from recreation and access. Impacts such as those from off road vehicle use result in habitat destruction, increased sedimentation to water bodies, noise and air pollution. The EIS should disclose all impacts associated with such activities and describe actions to be taken to manage recreational and accessibility opportunities in the project area.
200	Cumulative Impacts The Restoration Plan/EIS should assess impacts over the entire area of impact, and it may be of particular importance to consider the effects of other past, present and future projects/plans both in and outside the Coeur d'Alene Basin together with the proposed action, including those by entities not affiliated with the FS, BLM and FWS. For example, grazing or hydroelectric projects, etc ... Where adverse cumulative impacts may exist; the EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. Only by considering all actions together can one conclude

	what the impacts on environmental resources are likely to be. In determining cumulative effects, the EIS should clearly identify the resources that may be cumulatively impacted, the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed plan and related projects. The focus should be on resources of concern i.e., those that are at risk and/or are significantly impacted by the proposed action before mitigation. In the introduction to the Cumulative Impacts Section of the EIS, identify resources analyzed, which ones are not, and why. For each resource analyzed, the EIS should: a. Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date. b. Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis. c. Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example, what will the future condition of the watershed be? d. Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives. e. Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. f. Identify opportunities to avoid and minimize impacts, including working with other entities.
201	Climate change effects Currently, there is concern that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. The EIS document, therefore, should consider how resources affected by climate change could potentially influence projects under the restoration plan and vice versa, especially within sensitive areas. The EIS should also quantify and disclose greenhouse gas emissions from projects under the plan and discuss mitigation measures to reduce emissions.
202	Coordination with other land use planning activities: The EIS should discuss how the proposed action would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the analysis area and vicinity. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. If an appropriate government body has proposed plans in writing, but the plans are not yet fully developed, addressed them. Of particular importance, the EIS should address existing constraints in the analysis area e.g., power lines and utility Right-Of-Ways, floodplains, recreation, and how acceptable land uses will be consistent with the results of the CERCLA 120(h) reviews, zoning requirements, and the ability to obtain construction and operating permits and licenses.
203	Coordination with Tribal Governments We recognize that there is Tribal representation on the Natural Resource Trustees. Therefore, much of the consultation and collaboration that complies with Executive Order 13175, Executive Order 13007, and the National Historic Preservation Act, may have taken place or be underway. We offer the following information as a reminder that this

	information should be included in the EIS. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes. The EIS should describe the process and outcome of government-to-government consultation between FS, BLM, FWS and each of the tribal governments within the analysis area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternatives.
204	National Historic Preservation Act (NHPA) and Executive Order 13007 Consultation for tribal cultural resources is required under Section 106 ofthe National Historic Preservation Act (NHPA). Historic properties under NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the National Register. Section I06 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer (SHPO/THPO). In addition, Section 106 requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated.
205	Executive Order 13007, Indian Sacred Sites requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity of such sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. The EIS should address the existence of any Indian sacred sites in the analysis area. It should address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how restoration projects will avoid adversely affecting the physical integrity of sacred sites, if they exist. The EIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan, including coordination with affected tribes.
206	Environmental Justice and Public Participation The EIS should include an evaluation of environmental justice populations within the geographic scope of the analysis area. If such populations exist, the EIS should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. Assessment of restoration impacts on minority and low-income populations should reflect coordination with those affected populations. One tool available to locate Environmental Justice populations is online at http://epamap14.epa.gov/ejmap/entry.html. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity to participate in the decision-making process.
207	Monitoring

	The proposed Restoration Plan/EIS should include a monitoring program designed to assess implementation of the Plan over time, effectiveness in achieving its goals, other positive or negative effects that may occur, and a mechanism to make adjustments if necessary.
208	May we start out this letter by once again thanking you for participating in the public forum on Aug 20, 2013, and extending the scoping comment period to August 27th. The discussions between the Restoration Partnership Trustees, Shoshone County Commissioners and the County's Resource Advisory Committee, combined with the public's comments are a great starting point. A lot of great suggestions, interesting concepts and important points were presented. Shoshone County would like to include this scoping document into the official record. Today America is still the greatest country in the world. In a little over a century less than 6% of the world's population was able to become the richest industrial nation on earth. Through the constitution and the free enterprise system America originated over half of the world's total production and created the highest standard of living in the history of the world. Through six great revolutions: Industrial, Machine, Transportation, Communication, Energy and Computer, America experienced more prosperity, more opportunity, more freedom and more wealth than ever before in the history of mankind. This is a product of the constitution created by the American Founding Fathers and it gives us freedom, prosperity, and peace. Private industry workers, government agency personnel, Indian tribal employees, elected officials and others all owe their status to the opportunity and wealth created by America's free enterprise system. We would not be where we are today and cannot continue to exist in the future without the prosperity afforded us by profits from business success of private industry. All of us today owe our education, our lifestyle and our future to this premise. Without the prosperity afforded by profitable businesses Shoshone County and America cannot exist. Due to the county's vast natural resources, the primary economic enterprises have historically been logging (forest health management) and mining. Along with these came the many businesses that supplied their material and many human needs. All contributed to the requirements and demands of our nation in war time. Our economy was booming as we supplied the nation with the resources. Shoshone County was a prime example of how free enterprise and America's Constitutional process are the only true avenues to prosperity. In 1905, 73% of the land in Shoshone County was placed in forest reserves as a multiple-use plan which included roads for a forest highway system and timber production and was managed by the newly created US Forest Service. In 1908 the Twenty-Five Percent Act was passed to supply revenue to support schools and roads in counties affected by the loss of the ability to settle and develop this new federal land. Beginning in the 1970- 1980's the use/management plans have been drastically altered in such a way that the economic usage promised has been greatly changed and decreased.
209	As seen with the recent sequestration cuts, the County's economic stability cannot rely on the continuation of SRS and PIL T funding in lieu of other economic uses of the forests. It is a high priority that the County be able to economically use our forests, which include proper timber harvests and permitted access to all mines that have been located within the reserves. Many of these mines have been remediated, but their claims are still held by mining companies, who could one day re-open them due to their economic value. They are not barren. This would necessitate a strategy of restoration of the major RS 24 77 County easement roads and trails as well as the inclusion of proper run-off methods and best management practices. The CdA Basin contains the nation's largest, richest and deepest mines; respectively the Bunker Hill, Sunshine and Star Mines. The steep topography left few

	options for mine and mill waste disposal. In 1900, in efforts to avoid law suits, the mining companies began using, and kept up with, the latest technologies in attempts to forestall and halt contamination.
210	Very few active mining companies have had contaminant spills have over the last several decades. The EPA, at the Central impoundment Area adjacent to the South Fork of the CdA River in particular, is currently contaminating our waters; and it has been transpiring daily for over a decade. This is continuous contamination is problematic for both human health and the resources. The County has not been apprised of the results of many studies within its jurisdiction regarding contamination. As the entity whose duty it is to protect the health and welfare of its inhabitants and environmental settings, Shoshone County is making it a priority to obtain complete access to any and all studies and environmental documents regarding contamination, clean up and restoration. As the County participates jointly with other Restoration Partnership entities for the health and welfare of the people within the CdA Basin, it looks forward to the successful fulfillment of the Restoration Plan.
211	The mining industry has always paid its employees well, as they service the mineral needs for the nation's technologies and conveniences. Mining employees, and others, spend their money locally when possible. Since the closure of the Bunker Hill Mine and many other area mines in the 1980's, our county has seen a dramatically reduced economic base. Currently, the County population is less than in the 1920's. Businesses struggle and often fail, leaving owners the choice of moving their business elsewhere or totally shuttering them. Our children leave upon graduation for better economic opportunities. A significant percentage of the County's population is either jobless elderly or jobless younger who either live on a fixed income or strive to survive on the nation's lowest welfare income while awaiting employment.
212	It is a high priority to Shoshone County that emphasis for any ecological project within the Restoration- Partnership (RP) Plan creates an economic environment that both employs its residents and brings in new businesses. Shoshone County welcomes participation in restoration strategies that benefit both the environment and the County's overall economics with good paying year-round employment and that will enhance our tax base. We do not view seasonal governmental employees on short-term projects as a means to improve the longevity within our economy. Governor Otter's position is evident by the following comment within the 2012 USFS Planning Rule. Bullet Point #5 quoted below: "The philosophies and values inherent in the directives discount the fact that economic, ecologic and social benefits are interdependent and should be treated equally. Instead, responsible officials are told they must "ensure that plans provide for ecological sustainability" while they must only "contribute to social and economic sustainability. "(FSM 1921.03, item2). Ecological sustainability is not a scientifically given fact, but characterized by the values that people want to see - in the same way that human values define social and economic sustainability. Requiring that ecological sustainability is ensured will leave plans highly vulnerable to challenge and creates a hierarchy of purposes where ecological considerations come first and foremost. This ignores the fact that if federal lands do not have sufficient relevance in economic and social tenns that it is then highly unlikely that budget support will ever be sufficient to address ecological needs. In addition to reconsidering the mandate for ecological sustainability that is implicit throughout the directives, there are certainly other places where consideration of economic and social benefits could be reinforced. For example, under the Handbook Chapter 30-Monitoring, broad-scale monitoring should most decidedly included monitoring the impacts of plan

	implementation on the health and well-being of surrounding communities."
213	It is also a priority that our culture, historic sites and towns be preserved rather than minimized. The elderly have heard of or lived through, times of great culture and prosperity in the County. These legacy stories continue to be passed down through subsequent generations. A great restoration strategy is to restore these existing areas. Through this, an income can be derived from businesses as curious tourists come to visit them.
214	Shoshone County needs a strong timber management program to support economic stability. Vegetative management programs provide protection from wildfires, enhance big game habitat, provide living wage jobs, fulfill county heritage obligations within NEPA statutes and provides needed revenues to support the county school systems and maintain roads within the county. Access to roads and trails, which are severely impacted by predators, ensures stronger survival for big game animals and ultimately ensures a healthier herd population within Shoshone County. Projects of this nature strongly endorse the productive harmony concept which Congress emphasized within NEPA.
215	The County recognizes that water quality must be strongly supported within watershed restoration projects. We need to emphasize the utilization of the best scientific practices and to include the use of GRAIP studies. We consider emphasis placed on the immediate repair of the 10% point sources, which contribute 90% of the sediment load, as a common sense approach that would allow for major sediment load reduction while reaching a larger quantity of water shed rehabilitation.
216	The County requests that it be a priority to put in a well-engineered lake on the South Fork of the CdA River with a low head dam. Projects like this not only restore conditions, but they also afford private enterprise opportunities to offer local employment and generate revenue for the tax base. Attached is an example of Silver Lake, a concept created by [redacted]. **[Attachment A; 145 KB]**
217	USFS engineers have advised the need for many structural repairs and maintenance to the Route of The Hiawatha bicycle trail within the Rails-to-Trails program. Funding from restoration projects that offer recreation opportunities and support exemplify the heritage for the American railroad systems, that also supports our local residents, and provide services for visitors world-wide.
218	The County looks forward to being participatory in the creation of well-located fish hatcheries that not only help the aquatic population, but can also derive revenue from visitors. We encourage programs that would fund family fishing, recreation trips that provide continual programs that raise trout for consumption and supports the Idaho fishing experience at the earliest age for children. Restoring the Hale Fish Hatchery would allow restocking our local streams and lakes.
219	The County desires inclusion of noxious weed control as a component of every project to enhance wildlife habitat and reduce fire fuel.
220	Shoshone County requests that projects are done in a way so that roads would remain open for future logging, mining and recreation activities.
221	The County would like the implementation of the "Preserving Our Equine Heritage on Public Lands Act " S 2283, when developing projects.
222	The County supports a strong plan addressing weed obliteration throughout the CdA Basin and the St Joe Basin. A portion of the funds must be directed to projects restoring all lands within the basins to a weed free environment.
223	The County is aware that we are in a big game corridor and looks forward to being participatory in a strategy of creating properly located fish and game habitat crossings.

224	These are but a few suggestions for projects and we look forward to a long term relationship which restores all environments: human, animal and vegetative species. In closing, the Shoshone County Commissioners appreciates coordination with the Restoration Partnership Trustees, utilizing the NEPA process, in all phases of the development of the programmatic EIS, Restoration Plan and its execution. Please extend all communication to the County Commissioner and the Shoshone County Resource Coordinator.
225	Fish barriers on Rails to Trails at Miner's Slough. This is/was a good fish rearing slough until Rails to trails installed new culverts to the South Fork and created fish barriers.
226	Gold Run creek has filled its channel and runs overland when there is high water. While we have not seen any erosion, fish cannot enter the stream from the South Fork during the high water. Formerly, there were cutthroat in the stream, but I have not seen any lately. You have to look at this to get an idea about fixing it. Land is owned by BLM and NJ Mining
227	Project Information required to evaluate a project for the Restoration Partnership Projects [redacted] Project Name- Determine with the use of reference conditions the Impairment status of waterbodies within the Coeur d'Alene river Basin. Study area- The project area would look at reaches within both the North Fork and South Fork of the Coeur d'Alene River basin. (Figure 1) Figure 1. Project area for evaluation of impaired verses reference watersheds Project Description- In order to determine the impairment status of a given water body, there must be some means to establish what levels of pollutants are acceptable before that waterbody becomes impaired. For water quality constituents such as nutrients or heavy metals that likely arise from point sources, State standards expressed as a concentrations define a level at which beneficial uses become adversely affected. However, for constituents such as sediment in wildland settings, that exhibit both background and accelerated levels that are extremely spatially and temporally variable, a simple concentration that would define impairment cannot be determined with any degree of reliability. Little North Fork Coeur d'Alene River North Fork Coeur d'Alene River South Fork Coeur d'Alene River Independence Creek Shoshone Creek Prichard Creek Tepee Creek Coeur dAlene River 404 Miles N Streams Lakes Highways 5th Code HUCs Legend The fact is that sediment has been identified as the major pollutant of concern and cold water biota, salmonid spawning have been designated, the beneficial use in most of Coeur d'Alene river wildland watersheds, makes it necessary to develop a methodology for determining impairment that is not compromised by the variability that is found in nature. Consequently, the North Fork Coeur d'Alene river TMDL's have evolved into what amounts to a watershed assessment that defines 1) watershed condition, and 2) a list and schedule of restoration activities designed to restore beneficial uses where necessary. An important component of this assessment is a narrative, based on watershed-specific data, describing the condition of the watershed with respect to its potential. One means of determining baseline levels of pollutants that have extreme spatial and temporal variability is through comparison with "benchmark" or "reference" conditions that exist in a similar watershed. If watersheds have similar physical characteristics, processes, climatic regimes and natural disturbance histories, the production of physically derived water quality constituents such as sediment is expected to be similar. By comparing

sediment levels in a “target” stream segment with those in similar reference segments, an assessment of the existing condition of the target segment can be made.

The concept of using minimally disturbed sites as references has appeared in the literature in recent years (Dissmeyer, 1993; Minshall, 1994; Maxwell et.al., 1995), and recent methodologies for analyzing watershed conditions (USDA et. al., 1994; USDA et. al., 1995 USDA and USDI, 1998) recommend the use of reference watersheds as a means of determining the effects of land management

In a nutshell, the reference reach concept relies on the premise that watersheds with similar physical characteristics and recent disturbance histories will produce stream channels that are similar. Furthermore, if properly stratified, stream channel characteristics are predictable and repeatable within those stratifications.

Project Approach/Methodology-

The Rosgen (Rosgen, 1994) classification system is used throughout the Forest Service to characterize stream reaches. Specific objectives of the classification are to, “provide a mechanism to extrapolate site-specific data to stream reaches having similar characteristics.” And, “A major impetus for studying streams is to determine how well their current condition meets their operational potential. Stream potential has been described in terms of ‘Desired Future Condition’ (USDA, 1992) and ‘Proper Functioning Condition’, (USDI, 1993). These definitions compare an existing condition to a functioning and stable operational potential for a given stream reach” (Rosgen, 1996).

The system is hierarchical, which conforms to the recommendations of Frissell et.al. (1986) and Maxwell et.al. (1995), and is based on the morphological characteristics of rivers. Each level of the hierarchy increases in specificity of measurements required and in the interpretations that can be made from the data. Because stream types are delineated on morphological characteristics it has sometimes been assumed that geomorphic and fluvial processes do not play a part in the classification. Such is not the case. “Since the assessment process is applied in a general manner…it is not readily apparent that the procedure is process based. In fact, the classification was developed by establishing morphological-process relations at reach specific levels and then developing methods to extrapolate these findings to other locations at broader levels of inquiry” (Rosgen, 1996).

Level I is the broadest level, and makes a tie between stream types and valley types. Level I classifications serve to, “provide for the initial integration of basin characteristics, valley types, and land forms with stream system morphology” (Rosgen, 1996). To accomplish that, measurements are made at Levels II and III. The Level III analysis determines the hydrologic “state” of the watershed. Rosgen states the objectives of the Level III analysis are to, “1) Develop a quantitative basis for comparing streams that have similar morphologies, but which are in different states or condition and 2) Determine the departure of a stream’s existing condition from a reference baseline.” By making quantitative measurements at Levels II and III changes in stream morphology at Level I can be accurately made in similar watersheds.

Stream Surveys

The surveys are designed to collect stream channel data that would characterize the reach from a physical standpoint and could be used in conjunction with vegetative data obtained from a companion survey for an overall assessment of riparian function. The following parameters would be measured as part of the standard survey:

- Three monumented cross-section depicting floodplain, bankfull elevation, water

surface, and thalweg. The cross section is used to compute entrenchment and w/d ratio. (Rod and level)

- Sinuosity
- Gradient (Rod and level)
- Stream substrate (Wolman pebble count)
- Thirty bankfull widths and depths (measuring rod)
- Channel Stability Evaluation (Rosgen, 1996)
- Bank Erosion Hazard Index (Rosgen, 1996)
- Valley Bottom Width
- Reach photographs
- Notes describing overall conditions with respect to previous and current management effects.

The sites are permanently established with painted rebar and surveyed to local benchmarks, usually a nail in a tree. Where applicable measurement protocols given in Harrelson et. al (1996) will be used. Locations for each site will be recorded by UTM as calculated from a map location or Global positioning station. Post-survey calculations will be made for a number of parameters to facilitate comparison between project and reference reaches (year 4). It is estimated that one could accomplish 40 stations during each field season, this would equate to 60 reference reaches and 60 impaired reaches. Within the Coeur d'Alene basin a number of stream reaches have also received an extensive amount of stream restoration, we would have the capability of sampling some of these stream reaches to examine their response to restoration work, this would substitute for some of the reference or impaired reaches above.

Existing Data Collection Efforts-

One should also access the exiting data from adjacent areas that can be used to help evaluate both reference and impaired conditions. From 1991 to the present, reference reach information has been routinely collected on the Beaverhead-Deerlodge National Forest as part of the ongoing stream survey program. A dataset of approximately 160 reaches exists from this effort. In 2002, the Greater Yellowstone Coordinating Committee sponsored a reference reach effort throughout the Yellowstone Ecosystem. This effort yielded approximately 80 reference reaches. In 1998, the Flathead, Lolo, and Bitterroot National Forests fielded a crew to collect reference reach data on those forests. Approximately 60 reaches were measured. In 2003, the Kootenai National Forest measured twelve reference reaches, and incorporated previous Kootenai NF data for another 25 reaches

Project Consistency with EPA ROD and CWA-

The work being proposed in the Coeur d'Alene Basin is not included as prescribed work in the EPA ROD. This information could be used to assess how watersheds within the South Fork that have gone through clean-up and restoration with an end goal of pre-mining functionality for wildlife and fisheries habitat compare to reference watersheds within the basin .

A demonstration of this kind is needed to support future work identified within the EPA ROD, the Restoration Partnership and to help determine the success of proposed restoration projects. Specifically,

work prescribed by the EPA ROD in Nine Mile Creek, Pine Creek, and Canyon Creek will greatly benefit from this data set. The EPA ROD outlines goals for physical and biological characteristics that include re-establishment of fully functional resident fisheries and

improvement of habitat conditions to enable successful migration. This project will help to test efficiency estimates and criteria within the EPA ROD and will serve as examples of a completed project and relate them to reference for planning and design of similar projects in the future.

Projected Benefits and outcomes-

Function Determination using Reference Reaches

There is no quantitative methodology, standard, or benchmark for determining function. The PFC Process (USDI TR 1737-9) is a qualitative assessment that provides a series of seventeen Yes/No questions and relies on the opinions of an ID Team regarding those questions. The final assessment, however, is a call rather than a quantitative determination. The proposed reference reach and impaired reach surveys integrate a number of measurement protocols, all of which can be used to answer some of the questions posed in the PFC methodology.

The stream surveys allow quantification of some parameters necessary to provide answers to the questions posed by PFC. For example, questions 1, 3, 13, 15, 16, and 17 all address how the reach in question compares with “natural” conditions for a variety of physical components. These components describe the dimension, pattern, and profile of the channel, and are essentially the same parameters necessary to utilize the Rosgen classification. By measuring these parameters, and comparing them to reference conditions for a similar stream reach(es), it is possible to make a function call that is supported by site-specific quantification.

There are two possible ways to compare reference and project reach information: 1) Choose a specific reference reach that is similar to the project reach and compare the parameters, and 2) average the data for a number of reference reaches and compare the project reach parameters the averages. In most cases, the project reach is compared with one or two similar reference reaches.

Some parameters carry more weight than other in the determination of function. Entrenchment and w/d ratio are critical in assessing the relation of the channel and the floodplain. The comparison of the cumulative distribution of bankfull widths along the reach with reference conditions is another measurement given a lot of weight in the function determination. If the stream is widening, or is significantly wider than a similar reference stream, it is a strong indication that w/d ratios have been altered. An increase in bankfull width along the channel carries implications for sediment supply, sediment transport, and stream bank stability. The mean stream width (W50), as well as the plotted cumulative width distribution are used to compare project and reference reaches.

Ratings for Channel Stability and Bank Erosion Hazard index (BEHI) are less rigorous from a measurement standpoint, but nonetheless provide a numerical means for comparison between project and reference reaches. Because of their more qualitative nature, they are not given the weight of the other measurements, and a function call is not made solely on them alone.

Generally, streams that have received a Non-Functioning call in this analysis have shown significant differences with reference reaches in terms of entrenchment, w/d ratio, and W50. If these parameters shift enough to cause a change in Level 1 stream type (an E to a C or B for example), it is likely that the above PFC questions would receive a “No,” and the stream would not be functioning. Functioning-at-Risk calls are made when some differences with reference reaches are evident, but the degree is not as great as with N-F reaches. For example, if reference conditions show a channel should be an E, with an entrenchment of 15, and a w/d ratio of 5, and the project reach is an E with an entrenchment of 4 and a w/d

	ratio of 11, the reach would be F-A-R because the channel is close to classifying as a different Level 1 stream type. For these borderline cases, the Channel Stability and BEHI measurements might be used to determine which function class a stream is placed in. When a reach was considered Functioning, it generally exhibited the same stream type as the reference, the curve showing cumulative width distribution closely matched the reference reach, and the Channel Stability and BEHI ratings were in the same class as the reference. Project Schedule- This project could be conducted in three phases during a 4 year period to study the conditions of the stream system morphology with in the Coeur d'Alene River. Phase 1 (year 1 and 2) would collect stream system morphology with in reference watershed in the basin. Phase 2 (year 2 and 3) would collect stream system morphology within watersheds that have been designated as impaired via the subbasin assessment of the North Fork Coeur d'Alene and South Fork Coeur d'Alene river and those that have been identified as not properly functioning in the Idaho Panhandle National forests geographical assessment of the Coeur d'Alene river basin. Phase three (year 4) would conduct analysis and generate the final report.
228	My wife and I own approximately 750 feet of waterfront and 60 acres on the northwest side of Mica Bay, Lake Coeur d'Alene. Our addresses are 5098 and 5116 W. Mica Shore Road. In 2010 a retention basin related to IDOT improvements of U.S. 95 failed and contaminated Mica Creek and Mica Bay with foreign material and violated the Clean Water Act. As a result, our Homeowner's Association in Mica Bay received $500,000 in a settlement for the damages caused by the IDOT project contamination. Some of these funds have been used as matching funds for [redacted] efforts to reduce stream bank erosion along Mica Creek. Our Association has also been granted a permit to remove 1,000 cubic yards of the foreign material referenced above - located near the public boat launch where Mica Creek enters the bay. However, our funds are not adequate to remove all of the foreign material that currently resides in the bay. Mica Bay Homeowner's Association has offered to partner with Restoration Partnership in projects aimed at restoring water quality in Mica Bay and we urge you to seriously consider participating in such a partnership inasmuch as restoring water quality in Mica Bay falls within Restoration Partnership's Mission as it relates to water quality. Thank you for your consideration of this request. Sincerely, [redacted]
229	On the Spokane River below the dam and Q'emiln Park is the last large section of undeveloped land on the river. (A few hundred acres). It is a great water shed area that is located between two city parks. It would be great to protect this from development.