



August 20, 2008

Coeur d' Alene Tribe
P.O. Box 408
Plummer, ID 83851

Idaho Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

Greetings,

The Kootenai Environmental Alliance (KEA) appreciates the effort put into creating the Draft 2008 Lake Management Plan. Thank you for the opportunity to provide the following comments.

KEA feels that reliance on voluntary compliance and existing regulations provides little incentive for change. Enforcement of current regulations and compliance with the Action Items in the MATs is imperative to improve water quality. This is only the first step, clearly defined consequences to water quality "trigger" exceedances must be established and enforced.

Lack of secure funding has plagued previous attempts to initiate a LMP. It is apparent that this obstacle has not been overcome.

Specific planning is needed to address items that adversely affect sediment disbursement such as dredging or sediment removal for development purposes. Rampant development in the basin has prompted proposals to remove/disturb large amounts of metal laden sediments for marina expansion at Blackwell Island and expansion of City utilities in Harrison across the Coeur d'Alene River. In addition to prudent land use planning an institutional controls program for sediment removed from the Lake and rivers (which is apparently not covered under CERCLA) needs to be established.

Also, the headwaters of the Coeur d'Alene basin must be protected from excessive road building and logging operations to minimize flooding and the resultant introduction of toxic metals and sediments from entering the Coeur d'Alene Lake and downstream to the Spokane River.

KEA supports the proposed development of triggers; however, we feel that clear consequences should be implemented. Several parameters already exceed the water quality standards.

We strongly support increased public awareness and establishment of a lake stewardship center. Kootenai Environmental Alliance will be happy to distribute information concerning Lake water quality to its members.

Special studies concerning the identification of solid-phase geochemistry of mine waste and the impacts of development should be proposed.

- Correct identification the solid phases in which heavy metals reside is imperative to sound Lake management. Results from Horowitz, 1995, and Toevs et al., 2006, are not consistent. The most recent data (Toevs et al., 2006) suggest that metals are held predominantly in carbonate phases, which may be less susceptible to release under anoxic conditions than the sulfate phases identified by the Horowitz data. This data is vital to understanding the geochemistry of this system.
- Development around Lake Coeur d' Alene has been dramatic as stated in the 2008 Draft LMP. This rapid development may be impacting the water quality of Lake Coeur d' Alene. We suggest that the study proposed by DEQ on March 27, 2006, entitled "Land Use Change and Runoff Characteristics, Coeur d' Alene Lake Area" be funded. This study would help to identify the effects that large golf course subdivisions are having on surface and ground water in the vicinity of Lake Coeur d' Alene.

Thank you again for the opportunity to comment on the Draft Coeur d'Alene Lake Management Plan.

Sincerely,

Barry Rosenberg
Executive Director