DEQ QUESTIONS AND CONCERNS

North Idaho Maritime Wolf Lodge Bay

Lakebed impacts and shoreline erosion

- **Please provide a recent bathymetry map of the project area, with details indicating the extent of the "work area", pier and dock, access channel, and mooring areas, both during full pool, and at low pool.**
- **Please provide an estimate of throughput associated with construction and operation.**
    - 2-3 Trucks per day usually coming around 7:30 AM and leaving around 3:00 PM. 2-3 Boats leaving the area and coming back along congruent timelines.
- **Will operations take place year round (i.e., during high and low pool), or will there be an adjustment to account for decreased vessel clearance during low pool?**
    - There will be a major adjustment to account for decreased vessel clearance during low pool. Most major operations at this location will be suspended through the winter because of water depth.

- **Please clarify whether dredging is anticipated at this location for construction, or in the future for operation.**
    - We will not be dredging at this location for construction, nor is it anticipated in the future for our operation
- **Please provide a thorough description of erosion, sediment, and turbidity controls, and any other Best Management Practices (BMPs) that are planned for the construction of this project, as well as those which would be in place during operation to monitor for, and prevent water quality degradation.**
    - Site Evaluation, Assessment, and Planning
        - Available Contact Information for Relevant and responsible parties
        - Project/site Information distributed and made familiar
        - Sequence of construction activity outlined
        - Agency recommended methods deployed to mitigate sedimentation, turbidity, and to combat Eurasian milfoil
    - Erosion and Sediment Control BMPS
        - Stabilize soils
        - Protect slopes

            - Rip Rap etc.
        - Floating silt curtain deployed as necessary
        - Shoreline silt fence deployed as necessary
        - Perimeter controls and sediment barriers
        - Retain sediment on-site
        - Establish Stabilized construction exits
    - Good housekeeping BMPS
        - Establish proper building material staging areas

- **Please indicate any measures that will be taken to ensure project construction and operation (1) will not violate Idaho Water Quality Standards and (2) will align with Coeur d'Alene Lake Management Plan goals to limit metals and nutrients in Lake Coeur d'Alene.**
    - Educate staff on water quality standards and main points of CDA Lake management goals
    - Deploy "No Wake" buoys if permitted
    - Maintain spill prevention plans
    - According to the DEQ's Coeur d' Alene Lake management plan, Wolf Lodge bay is one of the few areas on the lake that has very low to no amounts of lead and other metals. This because most of the metals

that came in were entering the lake through the CDA river and normal water flows of the lake weren't enough to carry those metals that far into the north east part of the lake. Our other workspace, in Cougar bay, is also not a hotspot for metals deposited in the lake. Going back and forth between these two areas does send our vessels through more contaminated parts of the lake, but most of these areas have ample water depth so high turbidity wouldn't be expected.

Hazardous Materials

- **Please indicate any plans or BMPs (e.g., spill prevention plans, spill kits, secondary containment) that will be used during construction and operation to prevent hazardous materials from entering waters of the State.**
    - Potential sources of pollution
        1. Fuel
        2. Hydraulic oil
        3. Grease
    - Spill Prevention Plan

    - Use of environmentally friendly oil products
    - Back pressure nozzles
    - Moorings will be strong enough to hold in expected conditions
    - Hoses will be supported without kinks
    - Connections in transfer system are leak free
    - Supervised transfer of fuel
    - Mandatory safety meetings covering handling of hazardous materials
  - Spill Kits
    - Maintain stock of absorbent pads
    - Drip pans and funnels when necessary
    - PPE and disposable bags and gloves
    - Designated containers to dispose of materials
    - Floating Booms if necessary
  - Secondary Containment Measures
    - Oil, fuel and grease stored in a secondary container
  - Inspection and Corrective Action

Treated Wood and Piling Removal

- **Does the applicant plan to use treated wood products that have been approved by EPA for aquatic use?**
    - Yes, but all of these materials will be above the waterline or installed above the high pool.
- **Will the existing pilings be removed? If so, are any BMPs proposed for this work?**
    - Pile Removal BMP's
        - Vibratory Extraction.
        - Direct Pull
        - Cutting
            - If piling must be cut it will be cut as low as possible and at "slack" water. This is intended to reduce turbidity due to reduced flow.
        - After pile is extracted it is moved directly from water to a sediment containment area
        - Floating surface debris to be collected and disposed of with the piling
        - Floating silt curtain to be deployed if necessary