

**IDAHO DEPARTMENT OF FISH AND GAME**

PANHANDLE REGION
2885 West Kathleen Avenue
Coeur d'Alene, Idaho 83815

Brad Little / Governor
Ed Schriever / Director

April 22, 2020

Amidy Fuson
Resource Specialist Sr., Navigable Waters
Idaho Department of Lands
Mica Supervisory Office
3258 West Industrial Loop
Coeur d'Alene ID 83815

Dear Amidy:

REFERENCE: ERL-95-S-1378B – Condon Commercial Pier

We have reviewed the above-named application to install a 150 foot commercial pier and dock in the Wolf Lodge Bay area of Lake Coeur D'Alene. The purpose of these comments is to assist the decision-making authority by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated.

Docks, piers, and pilings are an encroachment in lakes and rivers that can be detrimental to fish habitat and public angling opportunities. In this case the 150 foot encroachment into the public waterway of Lake Coeur d'Alene will have little impact on angling opportunity due to the location being in a shallow, backwater area of the lake.

Lake Coeur d'Alene is designated as critical habitat for bull trout by the United States Fish and Wildlife Service. Native westslope cutthroat trout, a species of concern in Idaho, are present year-round throughout the lake. Additionally there are significant kokanee spawning areas nearby that require clean gravels to provide for successful egg incubation. We recommend construction be completed during low water, that all appropriate erosion/sediment control and sound/vibration suppression BMPs be employed during construction, and until disturbed areas are fully stabilized. Additionally we recommend all pilings removed from the area be properly disposed of due to the probability of heavy metals contamination.

Shoreline modifications such as docks and breakwaters tend to benefit species such as smallmouth bass and northern pike, which have become widespread in the lake. Northern pike in particular have been documented to consume substantial numbers of migratory westslope cutthroat trout in Coeur d'Alene Lake, and currently there is an experimental effort by the Coeur d'Alene Tribe and IDFG to reduce pike numbers in some areas of the lake. Pike predation is a considered to be a significant threat to the small but important population of adfluvial westslope cutthroat that uses

Keeping Idaho's Wildlife Heritage

Wolf Lodge Creek for spawning and rearing habitat. We recommend keeping the footprint of the waterward portion of the facility to the smallest size practical.

The Wolf Lodge Bay/Mineral Ridge area is a popular location for viewing bald eagles during the early winter months, when they congregate to feed on spawned-out kokanee. The large numbers of birds are a substantial tourist draw for Coeur d'Alene and nearby communities, and thousands of people go to observe the birds each day during the holiday season. While it does not appear the proposed facility would likely have significant negative effects on the eagles themselves, it would seem prudent to defer construction work until later in January when birds have moved on, along with the crowds of people. Doing so would likely help to reduce traffic problems associated with wildlife viewing and the presence of construction equipment, make for a more pleasant viewing experience for the public, and minimize the potential for any disturbance to feeding and roosting eagles.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "CEL by Craig S. Walper". The signature is written in a cursive, somewhat stylized font.

Charles E. "Chip" Corsi
Panhandle Regional Supervisor