

**From:** [Department of Lands](#)  
**To:** [Comments](#)  
**Subject:** Comment Submitted  
**Date:** Wednesday, July 22, 2020 07:14:03 PM

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From: Bev Twillmann at bevtwillmann@gmail.com  
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City: Harrison  
State: Idaho

**Comment:**

TO: Idaho Department of Lands Hearing Coordinator – Chris Bromley  
Regarding: Case No. PH-2020-PUB-22-002, North Idaho Maritime – John Condon, Applicant

Presented by Bev Twillmann, 15143 S. Asbury Road, Harrison, Idaho, 83833  
July 22, 2020

I am definitely opposed to Idaho Department of Lands issuing a commercial navigational encroachment permit to North Idaho Maritime/ John Condon as it is one of the most destructive proposals I have seen in my over 15 years of involvement with land and water issues.

On your website, IDL clearly states their mission in regards to the waters of Idaho, and I quote: “Idaho’s public trust lands are the lands submerged below the ordinary high water mark of navigable lakes and rivers. Title to these lands is held in trust and is administered for the public benefit rather than for a specific beneficiary. IDL manages these lands to provide for their commercial, navigational, recreational and other uses.”

Wolf Lodge Bay is used extensively for recreation by thousands of people yearly. Just yesterday (Tuesday, July 21) when I drove by I counted seven (7) runabout boats (some with tubers and skiers), two (2) fishing boats, three (3) paddleboarders, a kayaker, and numerous people along the shoreline swimming and recreating in that Bay of Lake Coeur d’Alene. With the Mineral Ridge launching ramp lot full, the surrounding waters around Wolf Lodge Bay were also bustling with activity. On the weekends it is even busier, with many paddleboarders, canoes and kayakers coming from the adjoining campground.

Allowing a 100 foot dock, with huge barges on either side of it, along with tug boats, etc. and everything else North Idaho Maritime will need for their commercial business, will basically block this Bay from safe, healthy and aesthetically pleasing use by anyone else. In short, it would be a commandeering of the entire Wolf Lodge Bay, which should not be allowed by Idaho Department of Lands. It is stated very clearly on your website that “Title to these lands is held in trust and is administered for the public benefit rather than for a specific beneficiary.” If this is allowed, it will be for the benefit of North Idaho Maritime, a “specific beneficiary,” no one else. The “public” will suffer with the loss of a popular site to recreate.

With numerous other reasons to deny this application, I would like to concentrate on specifically one other that I feel is incredibly significant to this decision. Lake Coeur d’Alene is a fragile Lake; IDL should not have to be reminded of that. 10 years ago when the state of Idaho entered into the Lake Management Plan with the Federal government to clean up this

superfund site, they basically entered into a contract with the Federal authorities to work to clean the toxic wastes up and make decisions to keep this body of water from getting any more polluted; basically Idaho committed to protecting Lake Coeur d'Alene from allowing shoreline and lake activities that would compromise the toxic sediment that has already settled on this lake bottom to be disturbed or to increase.

Idaho has failed miserably in that commitment. After attending numerous Basin Commission and Lake Management meetings over the years, spending much time in the Silver Valley attending meetings and talking to residents there, observing flood waters continue to bring more toxic waste into Lake Coeur d'Alene as they covered shorelines of our precious Lake, I saw how insincere our State agencies and decision making bodies have been in protecting what they had promised to protect 10 years ago. It came as no surprise to witness the Tribe pull out of the Lake Management Plan last year, and the full consequences of that are yet to be felt.

Our governor has bought some time with the Federal authorities to fully take over this protection by promising to re-check the stats the Tribe produced on the uptick of pollution in Lake Coeur d'Alene, and work harder in protecting this Lake from further pollution. Every time a State agency or a decision-making body allows a project to move forward with anticipated negative impacts to our Lake, it's another black mark against the sincerity of our State truly wanting to protect Lake Coeur d'Alene from further pollution.

Wolf Lodge Bay is shallow in many areas NIM wants to utilize in their proposal. Wolf Lodge Creek, classified as a Special Resource Water, feeds right into Wolf Lodge Bay, and brings much needed "healthy water" into this Lake. NIM will be blocking much of this feed into Lake CDA, as well as stir up polluted sediment at the bottom in this area each time a tug boat pulls in or out of the proposed docking area. This allowance is obviously not in the best interest of keeping Lake CDA healthy and leaving the toxins on the bottom undisturbed. Not only would we lose our spawning beds there, we would be only further polluting Lake Coeur d'Alene and give the Federal government another reason to take over protecting this Lake. Do we really want that? NO!

There are so many valid factual reasons to deny this application to North Idaho Maritime. That's why hundreds and hundreds have signed a petition against it, and many more are writing letters to IDL. It is a very poor place to put such an industrial business, and NIM has other options they have yet to pursue. There are similar businesses that don't even have a lake site; NIM already has a similar permit in Cougar Cultch. An aesthetically recreational Bay such as Wolf Lodge Bay should not be allowed to be turned into an industrial site hurting persons, wildlife, fish and the economy of our area. In summary, this proposal is destructive — destructive to the health of the Lake and its' future, destructive to the view, destructive to wildlife and fish, destructive to tourism – destructive!

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