Kinnikinnick Native Plant Society, Inc

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Army Corps of Engineers

Seattle Division

Attn: Nola R. Leyde, Public Affairs Specialist Via email: nola.r.leyde@usace.army.mil

The Kinnikinnick Native Plant Society wishes to strongly express its concerns about fluctuating the winter pool level of Lake Pend Oreille without significantly more study of potential consequences.

- Strong consideration needs to be given to the high risk of shoreline erosion and the negative impacts on shoreline vegetation, siltation of riparian zones, and nutrient loading (and the increased risk such nutrient loading has for the propagation of invasive species such as Flowering rush and Eurasian Milfoil).
- Fluctuation will negate any for reducing or killing Eurasian Water Milfoil that might result from hard freezing of the exposed littoral zone during drawdown.
- The repair work next summer to any resulting structural damage has a potential for site disturbance activities. This again poses risk of damaging sensitive riparian zones during the work.
- The Army Corps own procedures for implementing NEPA suggest that an EA should be conducted prior to a decision to move forward.

See:

http://www.gsa.gov/Portal/gsa/ep/contentView.do?contentType= GSA_DOCUMENT&contentId=12886&noc=T

(page 3, Section 7, paragraph d)

In short, we encourage you to abandon this plan for the winter of 2009/2010 and study it carefully before future consideration. Please add us to your mailing list for this issue.

Sincerely,

Molly O'Reilly Chair, Conservation Committee conservation@nativeplantsociety.org