



IDAHO DEPARTMENT OF FISH AND GAME
MAGIC VALLEY REGION
324 South 417 East, Suite 1
Jerome, Idaho 83338

C.L. "Butch" Otter / Governor
Virgil Moore / Director

November 8, 2016

Tom Bergin
Blaine County Planning and Zoning
219 First Avenue South, Suite 208
Hailey, Idaho 83333



Re: Camp Rainbow Gold CUP Application, East Fork Big Wood River, Blaine County

Dear Tom:

Idaho Department of Fish and Game (IDFG) staff has toured the site and reviewed the Camp Rainbow Gold conditional use permit (CUP) application submitted by Ruscitto Latham Blanton Architectura P.A. for the development of a children's camp on 260 acres along the East Fork Big Wood River. It is our understanding the proposed development will include cabins, staff lodging, and administration buildings as well as separate dining, recreation, and art facilities and other associated infrastructure. The camp is planned to operate approximately 150 days per year, May through October plus potentially one week in December. The camp may support upwards of 200 people during certain weeks of camp with a full time caretaker on site year round.

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. It is not the purpose of IDFG to support or oppose this proposal. Resident species of fish and wildlife are property of all Idaho citizens, and IDFG and the Idaho Fish and Game Commission are expressly charged with statutory responsibility to preserve, protect, perpetuate and manage all fish and wildlife in Idaho (Idaho Code 36-103 (a)). In fulfillment of our statutory charge and direction as provided by the Idaho Legislature, we offer the following comments and suggestions.

The area in and around the proposed development site provides important seasonal and year-round habitat for a variety of native wildlife. The physical characteristics of the area combined with the intact, contiguous nature of native plant communities provide transition habitat for migrating mule deer and elk, fawning/calving habitat for big game, and potential seasonal habitat for a variety of other native wildlife, particularly riparian and wetland dependent species. Human activity and infrastructure near or within areas used by wildlife can disrupt seasonal movements, reduce the quality and quantity of winter and parturition habitat, and increase stress during crucial life history stages. While the site is outside of designated winter habitat and migration corridors for big game, wildlife (i.e., mule deer, moose, elk, mountain lion, and black bear) do seasonally reside and move up and down the East Fork corridor.

The property is surrounded by public land that provides important and popular access for recreation (i.e., hunting, hiking, wildlife viewing, etc.). These activities on public lands are lawful, and constitutionally protected in the case of hunting, and will continue to occur into the future.

Keeping Idaho's Wildlife Heritage

According to Wildlife Management and Protocol Plan (Plan) that accompanied the application the development will include wildlife-friendly post and rail fencing, the use of bear-proof garbage containers/procedures, and wildlife training and protocol for staff and campers. No development will occur on sagebrush hillsides. All development is planned to be on approximately 60 acres along and south of East Fork Road, outside of the non-flood irrigated wetlands. These actions will help minimize effects to wildlife resources and reduce the potential for wildlife-human conflict. We offer the following conditions, many of which are addressed in the Plan, to further reduce potential effects and conflicts.

- Wildlife training and protocol for staff and campers should include procedures for encounters with large predators like black bears and mountain lions and large ungulates like moose.
- IDFG annually responds to depredation complaints in this area. Big game and other wildlife depredations on native plant restorations, landscaping plants, and gardens are anticipated if development occurs at this site. All responsibility for controlling wildlife depredation will belong with the property owner. Any actions taken to alleviate depredation will be those prescribed by IDFG.
- Beaver are common throughout the East Fork drainage. The property owner should develop a plan to manage beaver depredation that includes actions to protect tree and shrub plantings and mitigate lodge building activities.
- Unsecured garbage has the potential to attract black bears and other animals. We encourage the property owners to use bear-proof garbage containers and dumpsters.
- Refuse (household garbage, landscaping trimmings, etc.) burning should be strictly prohibited. Camp fires should be restricted to designated sites and their use consistent with U.S. Forest Service or Bureau of Land Management fire restriction guidelines.
- Pets running at large dramatically increase the negative effects of developments on wildlife. All pets should be kept in-doors, kenneled, or leashed at all times.
- We recommend all outside pet kennels are completely enclosed, including a roof, to prevent mountain lion and other predator depredation.
- All pet food should be stored and fed in a manner that does not attract “nuisance” wildlife (e.g., skunks, raccoons, magpies, red fox, etc.). All responsibility for controlling nuisance wildlife will belong with the property owner. Any actions taken to alleviate nuisance wildlife problems will be those prescribed by IDFG.
- Fences should be a post and rail or barbed wire design with a maximum top rail/wire height of 42” and a minimum bottom rail/wire height of 18”. Only smooth wire should be used for the bottom strand of barbed wire fences. This design will facilitate wildlife passage through the area. The following link provides good information on wildlife-friendly fence designs: <http://fwp.mt.gov/fishAndWildlife/landowners/>.

- Trespass has been an issue in this area. We recommend clearly marking the perimeter of the property with “No Trespassing Signs” or 100 in² of florescent orange paint on fence posts every 660 ft.
- All hay and other livestock feed should be stored and fed in a manner that does not attract big game or other wildlife species. Attracting big game from native habitats exacerbates existing winter habitat problems in the Blaine County. Any hay or livestock feed left on the premises during winter months should be made unavailable to big game.
- We recommend the feeding of game species or predatory wildlife be prohibited. Artificial feeding of wildlife tends to attract and concentrate animals away from native habitat, can facilitate the spread of disease, and has the potential to create conflict between neighboring homeowners due to the likelihood wildlife will use adjacent properties where they may be considered a nuisance.
- All actions needed for urban interface fire prevention (vegetation removal, fuel breaks, etc.) should be completed within the building envelopes. No vegetation clearing or other actions should occur on naturally vegetated portions of the property. Should this type of work require a larger space than that allotted for building envelopes, we recommend enlarging the building envelopes enough to accommodate these actions.
- Native plant communities support the most stable and diverse wildlife populations. Removal of native vegetation should be minimized and restricted to what is necessary to construct roadways, buildings, and other infrastructure. Vegetation and soil disturbance by contractors and utilities companies should be limited to roads and building envelopes only. We recommend all disturbed sites are restored using native plant materials.
- The property is surrounded by public lands that provide popular access for recreation (i.e., hunting, hiking, wildlife viewing, etc.). All support and administrative staff, campers, and other guests should be notified in writing that these activities on public lands are lawful, and constitutionally protected in the case of hunting, and will continue into the future.

Thank you for the opportunity to provide comments. Please contact Mike McDonald, Environmental Staff Biologist, in this office if you have any questions.

Sincerely,



Toby Boudreau
Magic Valley Regional Supervisor

Cc: Buffalo Rixon (RLB Architectura P.A.)
Kathy Grotto (Blaine County)
IDFG – Boise (Vecellio)
ECc: IDFG (R4 staff)



Keeping Idaho's Wildlife Heritage