



May 12, 2013

Jennifer Brown-Scott, Refuge Manager  
Deer Flat National Wildlife Refuge  
13751 Upper Embankment Road  
Nampa, Idaho 83686

Dear Ms Scott,

With careful consideration The Idaho Bass Federation and Idaho B.A.S.S. Nation wish to comment on the current proposals regarding the CCP/EIS for Deer Flat National Wildlife Refuge. Our two organizations have a combined membership of over 500 Idaho residents. Additionally, bass anglers throughout the state that are not members of either organization look to us for guidance and leadership in all conservation related issues. You are aware that we do not feel that the current preferred Alternative 2 is reasonable and we will highlight below our objections.

#### **No Wake Buffer Zone**

As was stated in Action Alternative #5 presented by The Idaho Bass Federation in 2011 the validity of establishing a no-wake buffer zone along the south shore would seem to serve no real purpose. The original discussion for that buffer zone was for a 200 foot area outside of the emergent weed beds. In the current Alternative 2 proposal that no-wake buffer zone has grown to 200 yards or three times larger than the original proposal. A boat traveling across the middle of the lake at full speed will create the same wake as a boat traveling within the proposed buffer zone. Once that wake forms it begins to dissipate and the emergent weed bed creates a natural buffer zone. Certainly a bass boat with a modified V hull at full speed creates a minor wake as compared to the same boat traveling at slower speeds. The need for the proposed no-wake zone is negated with the information provided by CCP staff addressed in the statement below regarding grebe closure. Original discussions for the no-wake zone centered on protection of nesting birds and to our knowledge is the only reason for that proposal. Because we are likely the biggest group using the weed beds along the south shore we find nothing to gain by establishing a no-wake zone of any type around any area other than the actual identified nesting areas. Although not originally acceptable, the 200 foot buffer zone is far more reasonable than a 200 yard zone. A 200 foot zone would provide adequate retreat for wildlife and limited mobility water craft such as kayaks or canoes during high use periods. Again, we urge you to tour the lake by boat sometime after May 30<sup>th</sup> which is the normal time frame when access into the emergent weed beds becomes virtually impossible. The weed growth becomes an impenetrable barrier and we believe that you will recognize why adding the no-wake buffer zone is unnecessary.

#### **Grebe Closure**

In several meetings during 2011 it became apparent that the scientific knowledge available regarding the breeding habits of the Western Grebe indicated that they nested in colonies. Where one nest

existed there would likely be many more. It was also disclosed that these nesting areas, known as colonies were easily identified once the nesting season began. We recognize the difficulty of defining these nesting areas as they may migrate from year to year and believe that the CCP should allow the ability to move the closure area from year to year. However, meetings with refuge personnel, disclosed that nesting history on the lake showed two dominant areas located in nearly the same spot from year to year. One of those nesting colonies has been located along the south shore in the current no wake zone on the east end of the lake with a second colony located a short distance to the east of the narrows, also along the south shore. In our proposal of 2011 we suggested that the only real need for a no wake area would be near the nesting colonies. We proposed a buffer zone of 500 yards around the nesting colony and are proposing access into that area **only by electric motors, push poles or other manual propulsion devices**. The ability to access these areas in this manner allows for the use of wildlife dependent activity such as fishing and wildlife viewing without damage to the nesting area or threat to the nesting birds. Grebes are primarily “raft nesters” reliant on the available vegetation to create their nests. They prefer open areas with plenty of sun light and using the weed bed in full bloom for the protection it provides. Raft nesting is well documented in several scientific publications as well as simple observation. As the season progresses and the majority of successful nesting is in full swing the mature emergent weed bed becomes an impenetrable barrier literally denying human access and creating full protection for the nesting colony. The current Alternative 2 addresses closure but is not clearly defined as to how that 500 yard closure is measured. If it is measured from the most exterior identifiable nest in that colony in every direction that closure could encompass very large areas. Our suggestion is to measure that distance from a readily identifiable middle colony nest. That would allow for a 1000 yard closure. It may be possible that some nests are built outside of that closure. History has proven the grebes will prosper even without a closure and it is our belief that a very large percentage of the nesting birds will be inside the closed area and will capture the maximum nesting potential. Our observation here is that access restriction is far more reasonable than full closure serving the purpose of allowing protection for the nesting colony and wildlife dependent human activity. Conservation personnel from our two organizations would gladly assist in the marking of these restricted areas.

### **East End No-Wake Zone**

We find that the current no-wake zone on the east end of the lake is very restrictive. We are not sure when it was established but believe it too was created to protect the nesting colony that has historically used the south shore in that area. It is puzzling that it is necessary to place restrictions on boater usage of that entire area when only a very small portion is actually used by the birds. The current preferred Alternative 2 calls for enlarging that no-wake zone. In our meeting with refuge staff we were advised that the proposal was the result of a request to fish that area from Gott’s Point to the current no-wake zone without being concerned with wakes being created by boat usage. The predominant numbers of anglers using that area are bass fishermen who fish there because the concrete structures placed a number of years ago create habitat that holds fish. We are aware of the value of that area to overall fishing on the lake. At the first of the season when the lake is at his fullest the concrete is submerged with the exception of that laying along the shore line. As water levels fall the concrete becomes visible and is easily avoided. Any angler aware of the presence of that concrete will find it without problem even when it is only slightly submerged. The need to add approximately 50% more no-wake area to the current zone would be better served by placing a buffer zone along the north shore from Gott’s Point to

the current no-wake zone line. The **best** solution to those who may be concerned about the concrete is to place marker buoys on them like the ones in many bodies of water that indicate rocks below. By doing that everyone knows they exist. Again, anglers from our organizations would be more than willing to assist in that project.

### **Narrows No-Wake Zone**

This is a proposal that was not discussed at all when the planning process began in 2011 but appears in the preferred Alternative 2. We were advised that this was proposed because of a concern by anglers who like to fish in the narrows. Again, the bulk of anglers fishing in that area are bass fishermen working the weed beds along either shore line early in the season and then fishing deeper water as the season progresses and lake levels fall. We know from experience that the lake is susceptible to high winds and the most dangerous part of that water during those winds is the narrows. Once an operator gets his boat to a comfortable planed position in rough water the last thing he wants to do is take it off plane to adhere to a restriction that creates a danger to the boat occupants. We understand the desire that some might have for this no-wake zone but that desire seems to be far outweighed by the inherent dangers of putting it into place.

### **On-Ice Activities**

We recognize that some people do not use good reasoning and there have been instances where human traffic has progressed across the ice in ways that may be detrimental to the birds wintering at the lake. The lake is open for fishing throughout the calendar year and access should be allowed in Fishing Areas A and B to include all wildlife dependent activities. Again, members of our organization and other wildlife groups would likely be available to help mark off limits areas as cold weather approached.

### **Summary**

It is the intent of The Idaho Bass Federation and the Idaho B.A.S.S. Nation to comply with whatever regulations apply to the refuge and I am sure that our reputations precede us in showing that we are one the most responsible groups of users. Our feeling is that the preferred Alternative 2 places unnecessary limitations on our ability to use the water for our recreational purposes. Both groups will eagerly work with refuge staff to implement improvement projects and programs deemed healthy for the lake and all of its users and ask only in return to consider that we have used the lake for many years and find no sound reason for changes to the current management system.

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