

From: [G. Robert Brakenridge](#)
To: [Victoria Simonsen](#); [Philip Strom](#)
Cc: [Nicholas Angelo](#); [Greg Lowell](#); steve@on-site.biz
Subject: Fw: Preble's mouse habitat at Planet Bluegrass in Lyons, CO
Date: Thursday, March 31, 2022 8:08:09 PM

Hello Victoria, Phil, and Nick,

Email below appears important to the Board of Trustees meeting on Monday given the item under consideration. Just received a few hours ago.

Thanks,
Bob

From: San Miguel, George L <george_sanmiguel@fws.gov>
Sent: Thursday, March 31, 2022 6:24 PM
To: jerry.powell@wildlifespecialtiesllc.com <jerry.powell@wildlifespecialtiesllc.com>
Cc: G. Robert Brakenridge <robert.brakenridge@colorado.edu>
Subject: Preble's mouse habitat at Planet Bluegrass in Lyons, CO

Hello Jerry Powell,

The U.S. Fish and Wildlife Service (Service) received your email of March 9, 2022, "PMJM Habitat Assessment - Lyons Colorado" with an attached March 3, 2022 letter "Planet Blue Grass Property Along the North Fork of the St. Vrain River, Lyons, Colorado – Preble's Meadow Jumping Mouse Habitat Assessment Request for Concurrence." We also have been exchanging emails regarding this proposal with Robert Brakenridge, Vice Chair of the Town of Lyons Ecology Advisory Board with some additional materials he provided.

In reviewing the totality of the Planet Bluegrass material so far made available to us, the Service has seen sufficient evidence to indicate the riparian vegetation along North St. Vrain Creek in the vicinity of the intersection of Apple Valley Road and West Main Street/Highway 36 retains adequate characteristics to support the Preble's mouse. While the habitat condition is not in prime condition, the presence of herbaceous and shrub cover as seen on some winter photographs appears suitable to support at least some of the Preble's mouse's life support functions such as sheltering, feeding, and dispersal. Furthermore, the riparian vegetation appears to be generally intact between known occupied Preble's mouse populations both upstream and downstream of the Planet Bluegrass site, and time lapse Google imagery shows the vegetation is steadily recovering from damage done by the 2013 flooding. As such, the Service is not convinced at this time that a no effect determination for this project's impacts to the species is justified. We believe the project as currently understood has the potential to result in take of the Preble's mouse so Planet Bluegrass needs to consider alternative plans to reduce the potential for take and/or provide additional material that would suggest take of

the Preble's mouse is not likely to occur.

The Service will need the following materials in a biological assessment once a final project plan is designed:

1. A description of the full scope of the project in detail. So far we see structures, bridges, parking, camping, fencing, grazing. Will there also be access roads, trails, utilities, landscaping, or anything else? What about ongoing impacts caused by the multiple recurring events themselves beyond the construction phase?
2. A quantified measure of the project's impacts to Preble's mice and its habitats including primary riparian habitat, and upland habitats that also are important to the species.
3. An accurate habitat assessment that maps and quantifies the extent of the Preble's mouse habitat in the project area, both riparian and upland. This will be necessary to get an accurate measure of impacts that will be needed in item 2 above. The assessment should also include a sufficient ground level photographic representation of the project area from during the growing season so that the habitat can be better evaluated.
4. The project's conservation measures should be carefully considered and expressed in the biological assessment. The Service needs to know how the project proponents intend to first avoid impacts to prevent take, then minimize impacts that cannot be avoided to reduce take, and spell out how the project would mitigate impacts that cannot be avoided or minimized to compensate for take that thus cannot be avoided or minimized.

We recommend reorganizing the project's layout to above all else avoid impacting areas in proximity to the creek. By establishing a conservation area for the Preble's mouse that encompasses the riparian habitat and a substantial adjoining upland habitat zone, areas farther from the creek could be developed without the risk of take. Furthermore, efforts could be made by Planet Bluegrass to encourage further habitat recovery and conservation through active restoration (planting, seeding, and weed control), fencing, signage, cattle exclusion, and other methods within the conservation area.

Let us know if we can be of further assistance in advising on the project's design to conserve federally listed species.

George L. San Miguel

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