

**Written/Fax/E-mail Comments, Public Hearings on
11/7/07 Revised Proposed Rule for the Preble's Meadow
Jumping Mouse**

Updated 2/14/08

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DAVE FREUDENTHAL
GOVERNOR



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JAN 24 2008

STATE CAPITOL
CHEYENNE, WY 82002

Office of the Governor

January 22, 2008

Susan Linner
Field Supervisor
Colorado Field Office
U.S. Fish and Wildlife Service, Ecological Services
P.O. Box 25486, MS-65412
Denver Federal Center
Denver, Colorado 80225

And via facsimile: 303-236-4005

Comments on Revised Proposed Rule to Amend the Listing for the Preble's Meadow Jumping Mouse - Specifying Over What Portion of the Range the Subspecies is Threatened

Ms. Linner:

Thank you for the opportunity to comment on the above-referenced proposed rule. The state of Wyoming has long held that Preble's meadow jumping mouse should be removed from the list of threatened wildlife based on an incomplete knowledge of the subspecies' range at the time of listing and the lack of significant threats throughout its range in Wyoming. As we stated in our petition, even if the mouse was to completely disappear along the Colorado Front Range, we do not believe that there is a risk of extinction range-wide in the foreseeable future because of its relatively broad distribution and the lack of threats in Wyoming.

We concur with the U.S. Fish and Wildlife Service's (FWS) proposed rule conclusions for each of the five-listing factors that protecting Preble's meadow jumping mice in Wyoming through provisions of the Endangered Species Act is not needed because threats to the mouse and its habitat are limited for the foreseeable future (see Conclusion of the 5-Factor Analysis on page 63017 of the proposed rule). Further, we agree that "continuation of long-standing activities (in Wyoming, agricultural activities such as grazing and hay production) appears supportive of existing Preble's ... populations" (proposed rule, page 63017). The FWS's inability to identify "any threats that are likely to have significant affects on the long-term conservation status of populations of Preble's ... in Wyoming" (proposed rule, page 63017) objectively describes the current and foreseeable status of the mouse in Wyoming based on the best scientific and commercial data available. We agree with

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the summary on page 63012 in the proposed rule that “present or threatened destruction, modification, or curtailment of the Preble’s ... habitat and range in Wyoming do not suggest that this subspecies is likely to become endangered within the foreseeable future.” Current and foreseeable land management practices ensure long-term security of Preble’s populations in Wyoming.

We do have several comments that need to be considered in development of the June, 2008 final rule. The comments contained in this letter apply only to the state of Wyoming.

Although most of our comments are based on a need for clarification in the final rule, especially regarding what appears to be confusion regarding the historic and current status of the mouse in the vicinity of Cheyenne, Wyoming, we are very concerned about the discussion on page 63018 of the proposed rule which suggest that the FWS is considering extending the significant portion of the Preble’s range that will remain threatened throughout the South Platte River Basin, including the portion of the basin located in Wyoming. Our comments follow:

Crandall Reports

The FWS needs to address the reports submitted by Dr. Crandall on behalf of the state of Wyoming in the final rule.

Mice Identified by Jones (1981) Should be Considered as Confirmed Specimens

On page 63000 of the proposed rule the FWS states that due to considerable overlap between Preble’s and western jumping mouse in Wyoming, the distribution analysis contained in the final rule “require all Wyoming specimens to be confirmed as Preble’s ... in order to be considered” in the discussion of subspecies’ current distribution in the state. In the proposed rule, confirmation is based on: 1) genetic analysis; 2) discriminate function analysis (DFA); or 3) identification by the Denver Museum of Nature and Science (DMNS) based primarily on the presence of an anterior median toothfold.

The proposed rule discusses the current known distribution of Preble’s in Wyoming based on 8-digit USGS hydrologic units. Assuming that the mouse collected from Badwater Creek in Natrona County, Wyoming is dismissed from the records evaluated as likely *Zapus hudsonius campestris*, the most north currently-known occupied hydrologic unit in Wyoming is the Middle North Platte drainage. The proposed rule states that although several jumping mice have been captured in this hydrologic unit, specimens of Preble’s have not been confirmed. In this hydrologic unit a jumping mouse was identified by Dr. Gyilym Jones (1981) as *Zapus hudsonius* as part of his systematic review of the genus. Because Dr. Jones used many of the same characters evaluated by the DMNS (including M1 and M2 paracone characteristics), we believe the FWS should consider this hydrologic unit historically and currently occupied. Dr. Jones may have disagreed about

subspeciation in *Zapus hudsonius* but his detailed work in comparing specimens of *Zapus hudsonius* with *Zapus princeps* should not be discounted.

Wyoming Comprehensive Wildlife Plan Status

On page 63006 of the proposed rule, the FWS states that the Wyoming Comprehensive Wildlife Plan lists Preble's as a "Species of Greatest Conservation Need." This designation is erroneous, as the Wyoming CWCS plan does not specifically address the Preble's subspecies, but rather the entire *Zapus hudsonius* species. The entire species is listed as a Species of Greatest Conservation Need, but this designation was made, along with a large number of other species, because of the relative lack of data regarding the species. This designation was made in the CWCS document, in these species' case, strictly to point out the generic need for more specific data rather than the need to address a threat. The information the Wyoming Game and Fish Department does have for meadow jumping mice has resulted in it being classified as "common" throughout the state and having a status of NSS5, which means the species is widely distributed, population status is suspected to be stable and habitat is not restricted. Based on our current understanding of the distribution of Preble's in the state and an independent assessment of threats, the Wyoming Game and Fish Department has applied an NSS5 status to the Preble's subspecies as well.

Counties Historically and Currently Occupied by Preble's in Wyoming

It appears that some confusion still exists about the historic range of Preble's in Wyoming. This issue was addressed in detail in the state's petition. In the proposed rule, the FWS states that the historic range of Preble's in Wyoming included Albany, Laramie, Platte, Goshen and Converse counties and that Preble's is now known to occur in four of the five counties described as the likely historical range. This statement suggests that Preble's has disappeared from one county in Wyoming, which is incorrect, and the statement needs to be clarified in the final rule. Although some of the older range maps, drawn at a state-wide scale, overlapped portions of western Goshen County, Preble's have never been historically "reported" from Goshen County and recent trapping efforts in that county have failed to collect the subspecies. The lack of Preble's in Goshen County should not be interpreted (as appears the case in proposed rule) to mean that the subspecies is no longer present in Goshen County but rather reflects overly optimistic historic range mapping which was not based on actual specimens. The final rule needs to clearly state that in Wyoming, Preble's is currently known to exist throughout its historically-known range and beyond.

Relative Abundance of Preble's in Wyoming Hydrologic Units

In the description of the Glendo Reservoir drainage, the FWS states that Preble's appears more common in the drainage than the western jumping mouse. In the description of the Wyoming portion of the South Platte River Basin, the proposed rule states that Preble's occurs in this basin in "possibly low numbers" and "the subspecies appears uncommon in the South Platte River basin" in Wyoming. Similarly, in the Upper Lodgepole drainage, the FWS states that Preble's "distribution

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may be limited.” We do not believe enough information is currently available to determine which species is more common in any of the hydrologic units in Wyoming. Not enough surveys have been completed in any Wyoming hydrologic unit to accurately suggest Preble’s is more or less common than western jumping mice. In addition, in many cases sampling in the state has been biased toward sites we thought most suitable for Preble’s. Recent surveys have been designed to only determine presence or absence of the subspecies. Much additional work is also necessary in the Lone Tree Creek drainage to determine if Preble’s is actually absent from the hydrologic unit.

Historic and Current Areas Occupied by Preble’s around Cheyenne, Wyoming

We take exception to the proposed rule discussion of Clippinger’s (2002) thesis regarding the “loss of jumping mouse populations from historical times in expanding urban and suburban areas, especially around Cheyenne...” First, the FWS needs to explain in the final rule that Clippinger’s work was not peer reviewed. You explain when discounting the value of Jones’ dissertation that his taxonomic conclusions (related to subspeciation in *Zapus hudsonius*) were not peer reviewed. In fact, on page 62995 of the proposed rule you point out that “Jones (1981) findings were not published in a peer-reviewed journal and were not incorporated into the formal jumping mouse taxonomy, leaving his conclusions difficult to evaluate.” Yet you fail to mention that the same is true of Clippinger’s thesis. The FWS needs to adhere to its policy regarding peer review. Second, post-listing trapping results clearly demonstrate that Clippinger’s conclusion regarding the loss of Preble’s populations from “urban development” around Cheyenne is not accurate. To date no one has been able to demonstrate that Preble’s currently or historically occurred in the vicinity of Cheyenne. Even though one of the specimens Krutzsch used to describe Preble’s was reported from “Cheyenne”, it is uncertain whether Preble’s ever occurred at lower elevations near the city. The only confirmed report of Preble’s (using the FWS criteria contained in the proposed rule) from the Crow Creek hydrologic unit is from South Crow Creek well upstream of Cheyenne at significantly higher elevation. What we previously believed to be Preble’s from Warren Air Force Base have proven to be, through DFA and genetic testing, western jumping mice. There is no evidence to support that Clippinger’s thesis conclusion regarding the loss of Preble’s near Cheyenne. The FWS needs to clarify for the record in the final rule that all historic sites thought at one time to be occupied by Preble’s in the Wyoming remain occupied. There is absolutely no data, historic or recent, to support the conclusion stated in the proposed rule that “urbanization” in and around Cheyenne has adversely affected Preble’s populations. Although the FWS reaches the same conclusion on page 63007 of the proposed rule, Clippinger’s conclusions still should be addressed where it appears in the proposed rule for clarity.

On page 63009 of the proposed rule the FWS states that “Preble’s ... apparent absence downstream from most areas of extensive urbanization (including Cheyenne, Wyoming ...) may be attributable to ... changes in hydrology.” We are unaware of any historic records of Preble’s downstream of Cheyenne. In fact, post-listing trapping in hydrologic units north of Cheyenne has failed to locate Preble’s this far east of the Laramie Range. To suggest that Preble’s disappeared where we have no

record of their historic occurrence and beyond what current trapping would suggest is the eastern limit of their range is speculative and misleading. Again, we need to stress that there is no data to suggest that Preble's have "disappeared" from any sites historically occupied in Wyoming. All the specimens examined to date from the area surrounding Cheyenne are western jumping mice. If the FWS has contrary information, it should be presented in the final rule.

Similarly, on page 63008 of the proposed rule the FWS describes the model results from Centers for the West which illustrate areas expected to experience significant increases in urban/suburban growth. The FWS concludes that the Centers for the West model predicts only limited growth in Wyoming, primarily around Cheyenne. We have reviewed these maps. Based on our current understanding of Preble's distribution we concluded that the modeled urban/suburban growth areas do not overlap or approach known habitats occupied by Preble's in the Crow Creek drainage (South Fork Crow Creek). In fact, if the model results are compared for the years 2000 and 2040, no additional new areas of "urbanization" are predicted anywhere in southeastern Wyoming. Urbanization is clearly not a threat to Preble's anywhere in the state of Wyoming and Clippinger's conclusions about urbanization threats are not valid in the state. We ask FWS to clarify this distinction between Wyoming and Colorado in the final rule.

The FWS does not explain how they calculated that "Preble's ... populations appear to have little likelihood of occurrence along 420 km (260 mi) in and downstream of areas with concentrated human development." (proposed rule page 63006). Additional information should be presented in the final rule about the assumptions used by the FWS to arrive at this estimate. If any of these calculated stream miles occur downstream of Cheyenne or elsewhere in Wyoming they should be removed from the total.

Five-Factor Analysis

We have carefully reviewed the 5-factor analysis contained in the proposed rule and agree that the conclusions reached for each of the factors in Wyoming is appropriate. We are unaware of any other information which could be incorporated into the analysis which would result in a different conclusion. By way of specific reference to the potential threats of climate change on Preble's populations, after consultation with the Wyoming State Climatologist, Dr. Stephen Gray, the state can only offer that precipitation estimates for the next 40 years are too uncertain to permit any concrete predictions and the interactive effects of climate change further inhibit our ability to make predictions for the Preble's specifically.

4-d Rule

For those portions of the subspecies range determined to be a "significant portion of the range where the subspecies is threatened", it will be extremely important to continue implementation of the 4(d)

special rule which the FWS adopted on May 20, 2004 (69 FR 29101). Continuation of the 4(d) special rule needs to be explicitly addressed in the final rule.

Portion of Preble's Range in Wyoming Where it is Not Threatened

As the proposed rule clearly demonstrates, Preble's should be delisted throughout Wyoming. Splitting the listing status between the North and South Platte drainages in Wyoming is contrary to the conclusions the FWS reaches for all of Wyoming in the 5-factor analysis. Such an approach is without merit and contrary to the current and foreseeable status of Preble's in Wyoming. The FWS must not adopt a final rule which bifurcates the listing status of Preble's in Wyoming. Wyoming strongly urges the FWS to aggregate areas for delisting based solely on the conclusions reached in the 5-factor analysis which clearly demonstrate that the current and foreseeable threats to Preble's in the North Platte River Basin are no different from those in the South Platte River Basin in Wyoming.

The state of Wyoming suggests that in addition to removing Preble's from the List of Threatened Wildlife throughout the state of Wyoming, the FWS also delist the mouse in two hydrologic units that originate in Wyoming and drain to Colorado. We believe that current distribution, potential for suitable habitat and threats all indicate Preble's should be delisted throughout the Crow and Lone Tree-Owl hydrologic units. In the Crow Creek Hydrologic Unit Preble's suitable habitat appear to be restricted to the headwaters of the hydrologic unit in the Laramie Range in Wyoming. We expect the same to be true if Preble's is ever confirmed in the Lone Tree-Owl Hydrologic Unit. Suitable habitat in Colorado portions of these hydrologic units is generally lacking. Threats in the Colorado portion of both these hydrologic units appear similar to those described for Wyoming in the proposed rule. We also believe that the FWS should delist Preble's throughout all of the Upper Laramie Hydrologic Unit, including the headwaters in Colorado. The majority of the lands in the Colorado portion of the Upper Laramie Hydrologic Unit are managed by the U.S. Forest Service and we consider development threats to Preble's in this area to be extremely low.

The state of Wyoming remains committed to ensuring the long-term viability of the Preble's meadow jumping mouse following delisting. The state is currently working with the Wyoming Natural Diversity Database to determine the relative connectivity of Preble's populations in Wyoming. Beyond this existing effort, the state is committed to conducting ongoing monitoring of Preble's populations. Under the guise of the recent Memorandum of Agreement signed between the state, FWS and Wyoming Game and Fish Department, we look forward to crafting not only an appropriate monitoring protocol, but also evaluating other issues of concern related to the delisting rule and other FWS efforts.

Again, thank you for the opportunity to comment on the proposed rule to delist Preble's meadow jumping mouse in Wyoming. Please contact us if we can provide any additional information regarding the proposed rule. We look forward to reviewing the final rule in June, 2008.

Susan Linner
January 22, 2008
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Best regards,



Dave Freudenthal
Governor

Cc: Terry Cleveland, Wyoming Game and Fish Department Director
John Etchepare, Wyoming Department of Agriculture Director
Brian Kelly, FWS, Wyoming ES Office

STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE

AN EQUAL OPPORTUNITY EMPLOYER

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6060 Broadway
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*For Wildlife-
For People*

January 22, 2008

Ms. Susan Linner
Field Supervisor
U.S. Fish and Wildlife Service
Colorado Field Office
Ecological Services
P.O. Box 25486, MS-656412
Denver Federal Center
Denver, CO 80225

Re: Colorado Comments in response to the U.S. Fish and Wildlife Service's request for public comment on the Revised Proposed Rule to Amend the Listing for the Preble's Meadow Jumping Mouse (FR 72: 62992-63024, November 7, 2007)

Dear Ms. Linner:

The Colorado Division of Wildlife (CDOW) recommends the Service re-assess their proposal to maintain federal listing of the Preble's Meadow Jumping Mouse (*Zapus hudsonius campestris*) in Colorado. Recognition of ongoing efforts to protect this subspecies' habitat from the threat of urban development as indicated in the Revised Proposed Rule, and use of the best scientific information available appears to us to be incomplete.

As previously described in the Department of Natural Resources comment letter dated June 1, 2004 (signed by Russell George, Executive Director), state agencies and local jurisdictions in Colorado have made great strides in addressing the threats posed to this species, including protection of the species via state listing as threatened, protection of habitat, scientific research into the life history requirements of the species, and development of conservation plans and actions. As of April 2007, the mouse occupies 143,378 acres in Colorado and 45% of this area is protected by either public/land trust ownership or conservation easement. The attached spreadsheet shows the details of the landownership of this occupied acreage. Additional information supportive of our habitat protection information may be found at the websites of the Natural Diversity Information System (<http://ndis.nrel.colostate.edu>) and the Colorado Ownership Management and Protection (<http://www.nrel.colostate.edu/projects/comap/>).

The Revised Proposed Rule does not afford these activities by the Department of Natural Resources (DNR), Division of Wildlife (DOW) and cooperating Colorado Front Range municipalities the consideration required under Section 4(b)(1)(A) of the Endangered Species Act and the U.S. Fish and Wildlife Service Policy for Evaluation of Conservation Efforts. Given the ongoing actions to protect Preble's habitat from the threats specified in the Revised Proposed Rule, including habitat protection through HCPs and conservation easements, and the fact that these efforts have been implemented in the absence of an approved recovery plan specifying recovery goals and delisting criteria, these actions speak to the consideration of whether federal listing protection is needed.

DEPARTMENT OF NATURAL RESOURCES, Harris D. Sherman, Executive Director
WILDLIFE COMMISSION, Tom Burke, Chair • Claire O'Neal, Vice Chair • Robert Bray, Secretary
Members, Dennis Buechler • Brad Coors • Jeffrey Crawford • Tim Glenn • Roy McAnally • Richard Ray
Ex Officio Members, Harris Sherman and John Stulp

These voluntary conservation actions form the basis of a conservation program led by Colorado DNR and DOW, and describe significant habitat protection efforts that are preferable to federal regulatory restrictions under ESA. It is not yet clear what constitutes recovery for this subspecies of mouse, or a status that precludes federal listing protection, but the record of actions in Colorado demonstrate our ability to implement a conservation program. Thank you for the opportunity to comment on the Revised Proposed Rule.

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Nesler".

Thomas P. Nesler
Statewide Manager, Wildlife Conservation Section
303-291-7461

cc: Blickensderfer, Colo. DNR
Remington, Director, CDOW
Ver Steeg, Asst. Director, Wildlife Programs, CDOW

Attch: PMJM Occupied Range Acreage by CoMAP¹

PMJM Occupied Range Acreage by CoMAP¹

<u>Landowner</u>	Managed	Owned
	<u>Acres</u>	<u>Acres</u>
BLM	65.30	152.80
CDOW	3163.13	2901.81
CITY	9043.82	9043.00
COUNTY	8740.74	8496.57
FEDERAL	6175.09	6175.09
FWS	2951.79	2951.79
JOINT		4492.25
JOINT CITY/COUNTY		414.66
LAND TRUST	498.56	498.56
METRO DISTRICT	158.89	158.89
NGO	934.90	934.90
PRIVATE UNDER CONSERVATION EASEMENT	87710.53	87710.53
SCHOOL DISTRICT	86.47	87.29
SLB	1475.24	1513.53
SPECIAL DISTRICT	359.97	359.97
STPARKS	4729.43	198.89
USFS - ARNF	10035.55	10035.55
<u>USFS - PIKE</u>	<u>7249.46</u>	<u>7252.79</u>
Total	143378.87	143378.87

¹Source: <http://www.nrel.colostate.edu/projects/comap/>



**USDA FOREST SERVICE
SOUTH PARK RANGER DISTRICT**

FACSIMILE TRANSMITTAL SHEET

South Park District Office
PO Box 219; 320 HWY 285
Fairplay, CO 80440
Phone: 719-836-2031
FAX: 719-836-3875

Lake George Work Center
PO Box 460; 140 Trail Creek Rd
Lake George, CO 80827
Phone: 719-748-3936
FAX: 719-748-8158

TO: **LESLIE ELWOOD**

FROM: **VUKIE BRANSETT - USFS**

SEND TO FAX NUMBER:

- DISTRICT OFFICE, FAIRPLAY
- LAKE GEORGE WORK CENTER
- WILKERSON PASS VISITOR CENTER

ORGANIZATION:

PHONE NUMBER:

TOTAL NO. OF PAGES, INCLUDING COVER

RE: **Trout creek**

DATE: **JAN 22 08**

ACTION APPROVAL AS REQUESTED FOR COMMENT FOR INFORMATION

NOTES/COMMENTS:

2007 Grazing Rotation

P/D/M

Allocation	Units	Days	On/off Dates
Phantom	43 pr	132	6/26 - 11/04
Drury	35 mat	95	11/23 - 2/25/08
Montague	18 mat	30	11/18 - 12/17

Manitou

Pasture (50 pair)	Days	On/Off Dates
Campground	7	5/01 - 5/07
Manitou Lake	24	5/08 - 5/31
South Trout	16	6/01 - 6/16
North Trout	18	6/17 - 7/04
White Spruce	20	7/05 - 7/25
Hay Riparian	14	7/26 - 8/08
Missouri	16	8/09 - 8/24
Countyline	14	8/25 - 9/07
Manitou	18	9/08 - 9/25
Painted Rocks	20	9/26 - 10/15

Wigwam

Pasture (50 pair)	Days	On-Off Dates
Webster	32	6/1 - 7/02
Molly	14	7/03 - 7/16
Wildcat	33	7/17 - 8/18
W. Matukat	10	8/19 - 8/28
E. Matukat	33	8/29 - 9/30

2006 Grazing Rotation

Allotment	#s	Days	On/off Dates
Phantom	40 pr.	141	6/18 - 11/5
Drury	30 pr.	111	11/24 - 3/14/07
Montague	To be determined		

Wigwam

Pasture (50 pairs)	Days (101)	On-Off Dates
E. Matukat	30	6/22 - 7/21
W. Matukat	7	7/22 - 7/28
Wildcat	24	7/29 - 8/21
Molly	10	8/22 - 8/31
Webster	30	9/01 - 9/30

Manitou

No Grazing

Non-Use for resource Protection

2005 Grazing Rotation

Allotment	#/a	Days	On/off Dates
Phantom	35 pr.	137	6/18 - 11/1
Drury	35 pr.	102	12/3 - 3/15/06
Montague	Non-use for Personal Convenience (1 st yr)		

Manitou

Pasture (50 pairs)	Days	On/Off Dates	*Use on Campground is contingent on hauling water. If Campground pasture is not utilized, the off date for the Manitou Allotment will be October 8.
Manitou Lake	24	5/1 - 5/24	
South Trout	16	5/25 - 6/9	
North Trout	18	6/10 - 6/27	
White Spruce	20	6/28 - 7/17	
Hay Riparian	14	7/18 - 7/31	
Missouri	16	8/1 - 8/16	
Countyline	14	8/17 - 8/30	
Manitou	18	8/31 - 9/18	
Campground	7	9/19 - 9/25*	
Painted Rocks	20	9/26 - 10/15	

Wigwam

Pasture (50 cows)	Days (101)	On-Off Dates
Webster	30	6/22 - 7/21
Molly	10	7/22 - 7/31
Wildcat	24	8/01 - 8/24
W. Matukat	7	8/25 - 8/31
E. Matukat	30	9/01 - 9/30

2004 Grazing Rotation

Allotment	Animals	Days	On/off Dates
Phantom	19 pr., 12 cows, 6 year.	125	6/28 - 10/31
Drury	24 cows, 6 pr.	124	10/15 - 2/15/05
Montague	Non-use for Resource Protection		

Manitou

Pasture (50 pair)	Days	On/Off Dates
Missouri	15	5/1 - 5/15
Hay Riparian	12	5/16 - 5/27
White Spruce	18	5/28 - 6/15
N. Trout	16	6/16 - 7/1
S. Trout	16	7/2 - 7/17
Manitou Lake/ Sky High	22	7/18 - 8/8*
Campground	12	8/9 - 8/20**
Painted Rocks	28	8/21 - 9/17
Manitou	16	9/18 - 10/3
Countyline	12	10/3 - 10/15

Wigwam

Pasture (50 cows)	Days (101)	On-Off Dates
W. Matukat	10	7/22 - 7/31
E. Matukat	21	8/1 - 8/21
Wildecat	14	8/22 - 9/3
Molly	10	9/4 - 9/13
Webster	17	9/14 - 9/30

Drury, Manitou and Wigwam Notes & Inspections

September 21, 2004

Manitou Allotment Inspection

Drove through pastures on east side of 67. Low use on uplands, high litter. Stubble height 6+" in riparian area, banks look good.

September 27, 2004

Drury Allotment Inspection

Veg looks great! Lot's of baby willows. Banks very stable with good veg coverage. No utilization at this time – winter graze.

June 13, 2005

Manitou, Drury Inspection

Met with Carl Olkjer at 67 spring. Jerry's cows in N. Trout. Manitou Lake most use in riparian area but stubble height good. Low use in uplands on S. Trout, where is supplement?

Drury had high use around Clearstrip tank. Cows look like they are hanging right there.

Sept 6, 2005

Manitou Allotment Inspection

Cows on west side of 67. Checked Red springs tanks – need more work. East side pastures need more use in uplands.

Sept 13, 2005

Wigwam Allotment Inspection

Where are the cows? Little use, found a few piles on Matakak rd. Checked Monument tank. Materials still out there but the tank is not finished.

Oct 5, 2005

Wigwam Allotment Inspection

Saw cows in Wildcat. Monument still not done.

May 3, 2006

Drury Allotment Inspection

Checked area where Laurie plowed and fed. Could not see any damage. Cattle still hanging around the tank.

August 21, 2006

Wigwam Allotment Inspection

Cows were in Wildcat, scheduled for Molly. Precipt has been great for veg but lot's of erosion. Grass looks awesome!

Sept 11, 2006

Wigwam Allotment Inspection

Monument tank still not finished. Could not find cows. Lots of erosion but grass looks incredible!

July 16, 2007

Manitou, Drury Inspection

Manitou - Little or no use on uplands next to 67. Supplement is in uplands on east side of creek, would help to put up by hwy fence.

Drury - new tire tank needs to be moved, too close to creek.

Aug 7, 2007

Wigwam Allotment Inspection

Checked new Buffalo tank. Major issues that need to be fixed. Will contact Rick.

Molly tanks outflow also need work. Saw piles and tracks but no cows.

Sept 9, 2007

Wigwam Allotment Inspection

Did not see cows. Checked Monument tank and Buffalo tank to see if fixed - looking better. Plant vigor is good with low use. Seeing lot's of weeds.

Oct 23, 07

Drury Allotment Inspection

Tank in much better location but overflow need to be buried and Laurie has some clean-up work to do.

Year: 2007

Allotment Monitored to Standard Form

allotment Wigwam

permittees Lost Valley Ranch

permittees contacted? YES

permitted on-date June 1

actual date on June 1

permitted #s 85 ac

#s put on 50 ac (low #s do to fire - some NONE issues)

permitted off-date SEPT 30

actual date off SEPT 30

rotation followed? YES

if not, approved? -

if not, why? -

consequences: -

salt locations good? YES

new improvements done? YES

if so, which ones? Buffalo tank

imps maintained? YES, but still a few issues that were resolved

key areas monitored? YES

utilization exceeded? NO

if so, % use or stubble height

notes: This year is the best the rotation has been followed. Still having issues with improvements. Rick Foster had good communication w/ Vickie this year and they got everything resolved.

ALLOTMENT INSPECTION

Allotment name Wigwam
Pasture name cell

Date 9-19-07

LIVESTOCK MANAGEMENT

Ownership Verified above seen

Livestock Counted (number) — did not see cows or wild ones in

Compliance with Permit ? scheduled pasture

Improvements are Satisfactory (getting there) ~~yes~~

Salting Locations Identified and Satisfactory did not see

Livestock Distribution did not see

Herder or Rider Performance ?

Contacts with the Permittee(s) e-mail yesterday spoke w/ Bob last week

RANGE VEGETATION

Major Plant Species feare, chgr, tortacalo, wheat

Vigor of Individual Plant Species good

Forage Utilization and Forage Residue low use

Flowering and Seed Maturity Date(s) of Forage Species _____

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations canada's milk, bull thistle

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) deer - 4

Soil Conditions granitic

Special Concern Areas lots of wash outs

Impacts to Rangeland Resources from Other Users lots of erosion (Hayman burn)

Riparian Values and Water Quality see above

COMMENTS

Saw some tracks in Matukat - been scheduled
in this since 8/19 but saw little use as far as
ground time. Other tanks look better but still a few
issues that Rick said would be fixed this week.
Where are the cows?

9/22/06

Year: 2006

Allotment Monitored to Standard Form

allotment	WIGWAM
permittees	LOSI VALLEY MARKET
permittees contacted?	YES
permitted on-date	June 1
actual date on	June 22
permitted #s	85 pr.
#s put on	50 pr.
permitted off-date	Sept 30
actual date off	Sept 30
rotation followed?	NO
if not, approved?	NO
if not, why?	not checking cattle enough - cows moved themselves thru the allotment
consequences:	NONC letter mailed
salt locations good?	did not see
new improvements done?	YES
if so, which ones?	Matakat Monument (scheduled '05)
imps maintained?	YES
key areas monitored?	YES
utilization exceeded?	NO
if so, % use or stubble height	-

notes: This allotment is in the middle of Hayman burn. Veg is looking great - natives coming back but erosion still a big problem. Nox weeds are being sprayed. Monument should of been done in '05. we were told it was done then discovered it had not been finished.

ALLOTMENT INSPECTION

Allotment name Willowram Date 9/21/06

Pasture name WEESKA, MOLLY, WINDCAT, MATUKA

LIVESTOCK MANAGEMENT

Ownership verified YES

Livestock count (#'s) 11 in WINDCAT

Compliance with permit NO - COWS in wrong pasture

Improvements satisfactory NO!

Salt locations satisfactory did not see

Livestock distribution yes, but wrong pasture

Contacts with permittee yes

RANGE VEGETATION

Major plant species _____

Individual vigor _____

Forage utilization and litter _____

Flowering and seed maturity date(s) of forage species _____

Noxious weed, insect, rodent, poisonous plant, infestations _____

OTHER RESOURCE CONSIDERATIONS

Wildlife (#'s) _____

Soil conditions _____

Special concern areas _____

Impacts to rangeland resources From other users _____

Riparian values and water quality _____

COMMENTS

ALLOTMENT INSPECTION

Allotment name WIGWAM - all Date 5.4.2006
Pasture name _____

LIVESTOCK MANAGEMENT

Ownership Verified N/A
Livestock Counted (number) _____
Compliance with Permit N/A
Improvements are Satisfactory _____
Salting Locations Identified and Satisfactory _____
Livestock Distribution _____
Herder or Rider Performance _____

Contacts with the Permittee(s) drove/hiked around w/ Ben Martin - manager

RANGE VEGETATION

Major Plant Species early caruo, Murno, Bogr, Fear, Deca, Caca
Vigor of Individual Plant Species good
Forage Utilization and Forage Residue varies from ^{lightly} used to unused
Flowering and Seed Maturity Date(s) of Forage Species June/July

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations Noxious weeds all over (Hayman)

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) ell, deer, hawks, saw kestrel w/ a mouse
Soil Conditions damp
Special Concern Areas _____

Impacts to Rangeland Resources from Other Users rec, gem mine
Riparian Values and Water Quality good - lots of early water

COMMENTS

Monument Tank - not in as B. Foster told us it was
located several other tanks
located on location for tank development on
Matukot and determined it would be okay
to use a fiberglass



Year: 2007

Allotment Monitored to Standard Form

allotment

MANITOU

permittees

JERRY JOHNSON

permittees contacted?

YES

permitted on-date

4/16

actual date on

5/1

permitted #s

75 DC, 204

#s put on

50 DC

permitted off-date

10/15

actual date off

10/13

rotation followed?

NO

if not, approved?

YES -

if not, why?

Rx burn on allotment

consequences:

-

salt locations good?

YES - would like to see salt on Hwy side of pasture

new improvements done?

NO

if so, which ones?

-

imps maintained?

YES

key areas monitored?

YES

utilization exceeded?

NO

if so, % use or stubble height

-

notes:

Jerry had some issues w/ CDOT fence; a Rx burn that messed up his rotation. The fence was completed so the Missouri pastures will be available 2008 and Jerry moved cattle into Manitou lakes past for about days then came home early.

ALLOTMENT INSPECTION

Allotment name Manitou C&H
Pasture name White Spruce, N Trout, S Trout

Date 7/13/04

LIVESTOCK MANAGEMENT

Ownership Verified yes

Livestock Counted (number) 50 c/c + 1 bull

Compliance with Permit no - cows should be in N Trout - by calendar - but by utilization cows are in correct pasture

Improvements are Satisfactory

Salting Locations Identified and Satisfactory OK

Livestock Distribution good

Herder or Rider Performance

Contacts with the Permittee(s)

RANGE VEGETATION

Major Plant Species

Vigor of Individual Plant Species

Forage Utilization and Forage Residue

Flowering and Seed Maturity Date(s) of Forage Species

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations lots of thistle

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers)

Soil Conditions

Special Concern Areas

Impacts to Rangeland Resources from Other Users

Riparian Values and Water Quality

COMMENTS

Cows in S Trout, gate between N + S Trout open.
Salt in S Trout along road to Exp. Station.

Heavy utilization ~ 70% in N Trout (even thistle was utilized) along riparian. Less utilization in uplands ~ 20%

ALLOTMENT INSPECTION

Allotment name Manitou
Pasture name Manitou Lake

Date 9/9/04

LIVESTOCK MANAGEMENT

Ownership Verified Yes

Livestock Counted (number) 30 c/c w/ 1 bull

Compliance with Permit no

Improvements are Satisfactory _____

Salting Locations Identified and Satisfactory _____

Livestock Distribution _____

Herder or Rider Performance _____

Contacts with the Permittee(s) _____

RANGE VEGETATION

Major Plant Species _____

Vigor of Individual Plant Species _____

Forage Utilization and Forage Residue _____

Flowering and Seed Maturity Date(s) of Forage Species _____

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations _____

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) _____

Soil Conditions _____

Special Concern Areas _____

Impacts to Rangeland Resources from Other Users _____

Riparian Values and Water Quality _____

COMMENTS

Cows in Manitou Lake pasture - off date was 8/22
rest of compliance

ALLOTMENT INSPECTION

Allotment name Traxton Date 9/11/04
Pasture name ~~S. Trout~~ ~~Meriton Lake~~ S. Trout

LIVESTOCK MANAGEMENT

Ownership Verified yes

Livestock Counted (number) 50 c/c w/ 1 bull

Compliance with Permit no

Improvements are Satisfactory _____

Salting Locations Identified and Satisfactory _____

Livestock Distribution _____

Herder or Rider Performance _____

Contacts with the Permittee(s) _____

RANGE VEGETATION

Major Plant Species _____

Vigor of Individual Plant Species _____

Forage Utilization and Forage Residue _____

Flowering and Seed Maturity Date(s) of Forage Species _____

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations _____

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) _____

Soil Conditions _____

Special Concern Areas _____

Impacts to Rangeland Resources from Other Users _____

Riparian Values and Water Quality _____

COMMENTS

Should I been out of pasture on 8/22.
Understand a 20% 30% repair.

ALLOTMENT INFORMATION

Allotment name Manitou
Pasture name Stout -> Manitou

Date 9/13/04

LIVESTOCK MANAGEMENT

Ownership Verified yes

Livestock Counted (number) 50 c/c

Compliance with Permit no

Improvements are Satisfactory _____

Salting Locations Identified and Satisfactory _____

Livestock Distribution _____

Herder or Rider Performance _____

Contacts with the Permittee(s) _____

RANGE VEGETATION

Major Plant Species _____

Vigor of Individual Plant Species _____

Forage Utilization and Forage Residue _____

Flowering and Seed Maturity Date(s) of Forage Species _____

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations _____

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) _____

Soil Conditions _____

Special Concern Areas _____

Impacts to Rangeland Resources from Other Users _____

Riparian Values and Water Quality _____

COMMENTS

Cows were being moved from Stout to Manitou pasture this morning

ALLOTMENT INSPECTION

Allotment name Manton
Pasture name Manton

Date 9/15/04

LIVESTOCK MANAGEMENT

Ownership Verified yes

Livestock Counted (number) 50 c/c

Compliance with Permit no

Improvements are Satisfactory _____

Salting Locations Identified and Satisfactory _____

Livestock Distribution _____

Herder or Rider Performance _____

Contacts with the Permittee(s) _____

RANGE VEGETATION

Major Plant Species _____

Vigor of Individual Plant Species _____

Forage Utilization and Forage Residue _____

Flowering and Seed Maturity Date(s) of Forage Species _____

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations _____

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) _____

Soil Conditions _____

Special Concern Areas _____

Impacts to Rangeland Resources from Other Users _____

Riparian Values and Water Quality _____

COMMENTS

on date is ~~not~~ 9/18

ALLOTMENT INSPECTION

Allotment name Maniston
Pasture name Maniston

Date 10/16/04

LIVESTOCK MANAGEMENT

Ownership Verified yes

Livestock Counted (number) 50/c

Compliance with Permit NO

Improvements are Satisfactory _____

Salting Locations Identified and Satisfactory _____

Livestock Distribution _____

Herder or Rider Performance _____

Contacts with the Permittee(s) _____

RANGE VEGETATION

Major Plant Species _____

Vigor of Individual Plant Species _____

Forage Utilization and Forage Residue _____

Flowering and Seed Maturity Date(s) of Forage Species _____

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations _____

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) _____

Soil Conditions _____

Special Concern Areas _____

Impacts to Rangeland Resources from Other Users _____

Riparian Values and Water Quality _____

COMMENTS

All date for pasture was 10/3 - cows were along FBR 390 (Ed. spring into Casey's barometer place)

Year: 2006

Allotment Monitored to Standard Form

Priority 2006

allotment	<u>Drum</u>
permittees	<u>Laurie Glaum</u>
permittees contacted?	<u>YES</u>
permitted on-date	<u>141</u>
actual date on	<u>11/24</u>
permitted #s	<u>30 pv</u>
#s put on	<u>30 pv</u>
permitted off-date	<u>2/20</u>
actual date off	<u>2/15</u>
rotation followed?	<u>yes</u>
if not, approved?	<u>-</u>
if not, why?	<u>-</u>
consequences:	<u>-</u>
salt locations good?	<u>did not see</u>
new improvements done?	<u>YES</u>
if so, which ones?	<u>clearstrip spring</u>
imps maintained?	<u>yes</u>
key areas monitored?	<u>yes</u>
utilization exceeded?	<u>no</u>
if so, % use or stubble height	<u>-</u>

notes: Had a lot of snow in early Jan (07) - Laurie fed cattle on allotment. Not sure if weed free hay. Richard Ochoa (MEF manager) called, very upset because Laurie plowed & drove on closed road to feed cattle. We called Laurie she said it was weed free(?) and that she was on open rd. Either way we explained that she should of called us first & if snow was that bad then she need to remove cattle from forest.

ALLOTMENT INSPECTION

Allotment name Duvern & Montagne Date 5-3-2006
Pasture name _____

LIVESTOCK MANAGEMENT

Ownership Verified N/A - not on allotment

Livestock Counted (number) N/A

Compliance with Permit _____

Improvements are Satisfactory working on

Salting Locations Identified and Satisfactory _____

Livestock Distribution _____

Herder or Rider Performance _____

Contacts with the Permittee(s) met w/ Laurie Blauth and looked at

RANGE VEGETATION

Major Plant Species Mummo, Flax, early cany (Cado), Cant, Dec

Vigor of Individual Plant Species Fair to good

Forage Utilization and Forage Residue used quite heavily in some areas

Flowering and Seed Maturity Date(s) of Forage Species grain / July

Noxious Weeds, Insect, Rodent and Poisonous Plant Infestations Canada chistle infestation

OTHER RESOURCE CONSIDERATIONS

Wildlife (numbers) lots of deer

Soil Conditions Wet, saturated, heaved in places

Special Concern Areas Canada chistle spot

Impacts to Rangeland Resources from Other Users lots of motorized use

Riparian Values and Water Quality Wetland below Clearstrip expanding

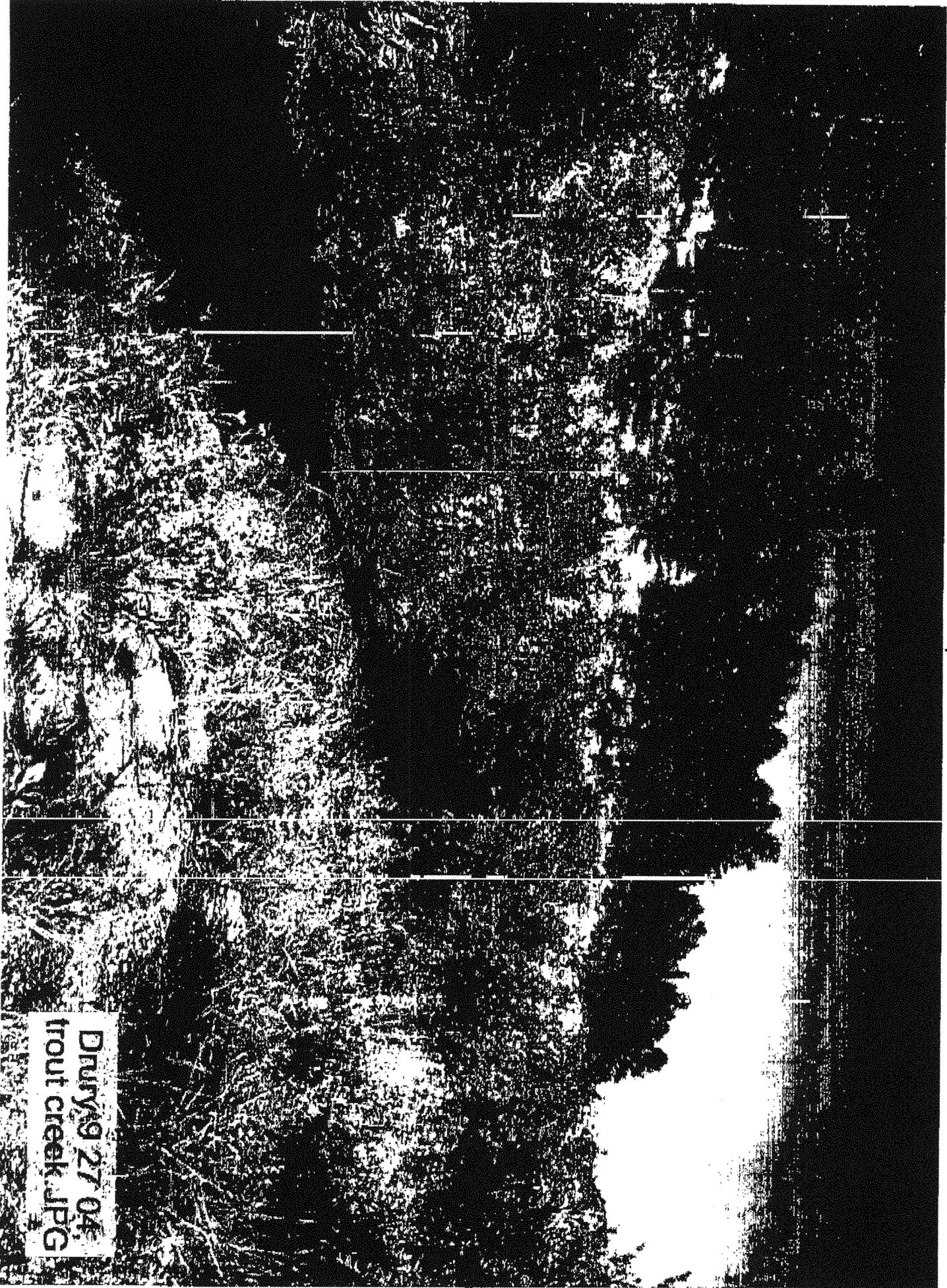
COMMENTS

Burned trees mainly starting to fall - fence in part in lots of places. New fence on Montagne needs heavy maintenance

Not contact for grass-fed beef - 295.8152 Duvern Saulton - B

DUVERN & MONTAGNE

Deven, August 2004

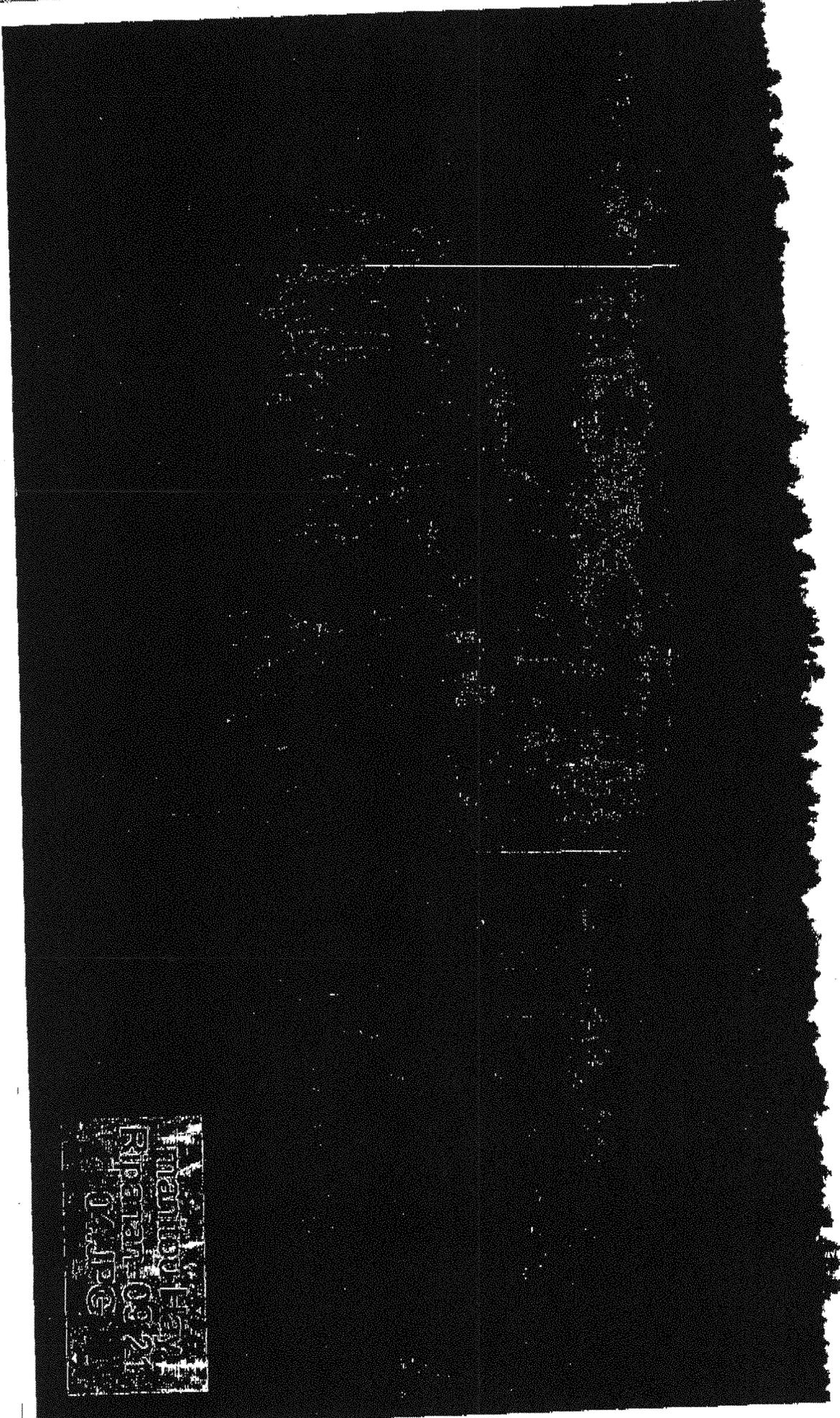


Dnurya9 27 04
trout creek.JPG

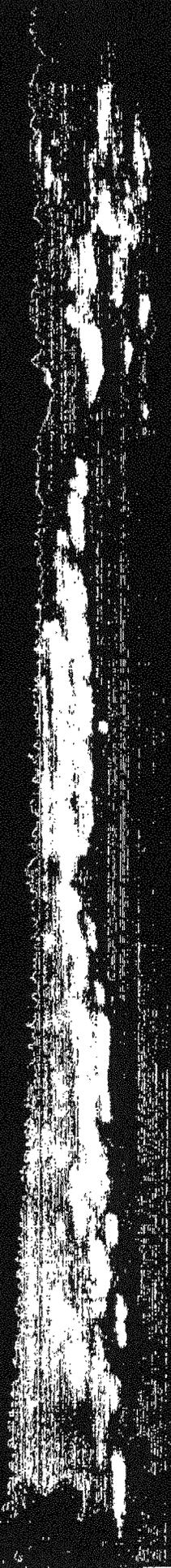


CHRY, BOJ
creek 0927
041156

manitou, 71607,
white?
spruce.jpg



SECRET
NO. 100
220



manitou strout
9 2004 JPC