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April 9, 2020

Governor's Office of Planning & Research

APR 09 2020

STATE CLEARINGHOUSE

Shanta Keeling
Water Resource Control Engineer
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Dear Ms. Keeling:

Draft general waste discharge requirements for discharges from irrigated lands
(PROJECT)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH# 2018021050

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the Central Coast Water Boards for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously submitted comments in response to the Notice of Preparation of the DEIR.

Thank you for the opportunity to provide comments and recommendations regarding activities involved in the Project that may affect California fish and wildlife resources. We appreciate the opportunity to provide comments regarding the aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board)

Objective: The objective of the Project is to regulate waste discharges from irrigated lands throughout the central coastal region. The Project will protect and restore beneficial uses and achieve water quality objectives specified in the Basin Plan for commercial irrigated agricultural areas in the central coast region. The proposed Project would regulate discharges of waste from:

- Commercial irrigated lands and discharges of waste from commercial nurseries, nursery stock production, and greenhouse operations.
- Lands that are planted with commercial crops that are not yet marketable, such as vineyards and tree crops.
- Lands that are planted with commercial crops that are not yet marketable, such as vineyards and tree crops.

Location: Monterey, San Benito, San Mateo, Santa Clara, and Santa Cruz

Timeframe: This Project will replace the current waste discharge requirements once approved.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Central Coast Water Board in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. Based on the Project's avoidance of significant impacts on biological resources, CDFW concludes that an Environmental Impact Report is appropriate for the Project.

Comment #1: Priority designation of tributaries

Section: Chapter 2 Project Description, Table 2-4; Appendix A, Draft General Waste Discharge Requirements for Discharges From Irrigated Lands (Agricultural Order 4.0), Part 2, Section C.5. Riparian Area Management for Water Quality Protection, 4b; Part 2, Section B: Phasing and Prioritization, Table B-1 Groundwater Phase Areas and Figure B-3 Riparian Priority Areas

Issue: Priority designation areas do not designate upstream reaches of Pajaro River and major tributaries to Pajaro River (including, but not limited to Llagas Creek, Uvas Creek/Carnadero Creek, and San Benito River) as having any priority designated. Streams without a priority designated are required to establish an operational riparian setback that is the least distance of either (a) 1.5 times the width of the active channel, on each side of the stream, or (b) as specified in tables including variables such as stream order, type vegetation present (i.e. grass, shrubs, trees), and percent slope (Appendix A, Part 2, Section C.5. Riparian Area Management for Water Quality Protection, 4b; Appendix A, Table C.5-1 Minimum Riparian Setback Width and Vegetation Type; Appendix A, Table C.5-2. Slope Adjustment). This operational riparian setback is generally smaller than riparian streams that have a priority designated (Appendix A, Part 2, Section C.5 Riparian Area Management for Water Quality Protection, 3; Appendix A, Section C.5 Riparian Area Management for Water Quality Protection, 2). The setback for a stream with a designated priority is established through four available pathways that include additional analysis of the stream by the discharger and additional Regional Water Quality Control Board (RWQCB) review than streams without a designated priority.

Nutrient pollution in surface waters of the Pajaro River Watershed has long been recognized as a problem, with irrigated agriculture likely contributing the majority of controllable nutrient loads to streams (DEIR 3.9.3 Environmental Setting, page 3.9-21). Upper Pajaro River and tributaries are closely surrounded by agriculture. Generally, upper Pajaro River and tributaries to upper Pajaro River (including, but not limited to Llagas Creek, Uvas Creek/Carnadero Creek, and San Benito River) have mature riparian habitat with thick tree canopy and diverse understory. These streams include habitat for special status species (e.g. Steelhead (*Oncorhynchus mykiss irideus* pop. 9) - South-central California Coast Distinct Population Segment – Federally Threatened; California red-legged frog (CRLF) (*Rana draytonii*) - Federally Threatened, State Species of Special Concern, Western pond turtle (WPT) (*Emmys marmorata*) - State Species of Special Concern; Least Bell's vireo (*Vireo bellii pusillus*) - State Endangered and Federal Endangered) and other wildlife such as roosting bats, nesting birds, and other aquatic wildlife.

Recommendation:

To reduce impacts to less than significant, it is recommended that upper Pajaro River and tributaries to the Pajaro River (including, but not limited to Llagas Creek, Uvas Creek, Carnadero Creek, and San Benito River) should be designated Priority 3 (the designation for the middle and lower reaches of Pajaro River) or should be designated Priority 4 at minimum. For some tributaries riparian shrub and tree vegetation is only present in the lower reaches (as reviewed in Google Earth). An operational setback for the upstream reaches of Pajaro River tributaries, where riparian shrub and tree vegetation is not present, may be appropriate and these reaches may not need to be designated a priority.

Comment #2: Lack of conservation plan identification within project site

Section: Chapter 3.3.4, Impact BIO-6

Impact Analysis: Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

This section states that there were not any Natural Community Conservation Plans (NCCP) in the Project Area. This is incorrect, as the Santa Clara Valley Habitat Plan (SCVHP) is a Habitat Conservation Plan/NCCP. This section discusses Habitat Conservation Plans (HCP) in general and does not have specific analysis for each HCP and/or NCCP. Some of the management practices proposed such as runoff management features (e.g. buffer strips or swales), sediment basins, and bioreactors may be covered activities under the SCVHP. Certain streams have setbacks required under the SCVHP (e.g. Llagas Creek and Uvas Creek/Carnadero Creek). For those management projects covered under the SCVHP, a stream setback may be required through the SCVHP and the proposed riparian setbacks, as described in the DEIR and Agricultural Order 4.0, may conflict with the SCVHP. This conflict is considered a significant impact.

Recommendation:

To reduce impacts to less than significant, the riparian setbacks described in the DEIR and Agricultural Order 4.0 and each type of management practice should be analyzed for potential conflict with the SCVHP stream setbacks. Any areas where conflict is identified, the SCVHP should supersede setbacks as proposed.

Comment #3: Impacts to riparian habitats

Section: Chapter 3.3.4, Mitigation Measure BIO-1 and Impact BIO-2.

Issue: Mitigation Measure BIO-1 states that dischargers must "Avoid and minimize disturbance of riparian and other sensitive vegetation communities" when implementing management practices. To "minimize disturbance" is a relative term. CDFW recommends that the EIR include more detailed guidance on how dischargers may avoid or minimize impacts.

Impact BIO-2 states "The total amount of riparian habitat or other habitat lost through displacement by management practices would likely be more than compensated by the riparian habitat that would be created/restored through the setback requirements of Agricultural Order 4.0". While setback areas would be subject to certain restoration actions such as removal of crops, seeding of grasses, rushes or sedges, or planting of trees or shrubs, the DEIR does not include a full analysis to the determination that riparian habitat removal under Agricultural Order 4.0 is less than significant. For example, mitigation should also be commensurate with the amount and type of habitat impacted, i.e., created or restored habitat should result in equal or better habitat than the habitat impacted.

Recommendation 1:

To reduce impacts to less than significant, dischargers, within the Annual Compliance Form (Attachment A (Agricultural Order 4.0), Attachment B Monitoring and Reporting Program, F Annual Compliance Form (ACF)), should include area (e.g. square feet) of riparian vegetation (e.g. shrubs and trees) removed due to construction of management practices and area (e.g. square feet) or riparian habitat (e.g. shrubs and trees) established within setbacks. The RWQCB should keep track of the riparian habitat removed and created, as a whole for the Project area.

Recommendation 2:

A timeline should be established (e.g., every 5 years) in which the amount of riparian habitat loss or gain is totaled. If there is a net loss of riparian habitat over the established timeline, additional mitigation may be warranted to offset the loss. Additional CEQA analysis may be necessary.

Comment #4: Impacts to Burrowing Owl (*Athene cunicularia*)

Section: Appendix C Special-Status Species

Issue: Burrowing owls are known to occur within fallow agricultural fields, debris piles, earthen berms, agricultural drains, and adjacent to active agricultural fields. The DEIR does not analyze impacts to burrowing owls.

Specific impact: The Project may result in direct and indirect burrowing owl mortality or injury, the disruption of natural burrowing owl breeding behavior, and loss of breeding, wintering and foraging habitat for the species. Project impacts would continue to contribute to statewide population declines for burrowing owl. Along the central coast, the species persists in low densities and continues to experience significant direct and cumulative habitat loss.

Why impact would occur: Impacts to burrowing owl could result from the construction of sediment retention basins, vegetated filter strips, riparian buffer areas, installation of efficient irrigation systems, runoff management features (e.g., swales), bioreactors, establishment of riparian vegetation that would require existing agricultural crop/vegetation removal, tilling, and planting of new vegetation, and other ground disturbing activities. Project disturbance activities may result in crushing or filling of active burrowing owl burrows causing the death or injury of adults, eggs and young. The Project will remove burrowing owl foraging habitat by eliminating native vegetation that supports essential rodent, insect and reptile that are prey for burrowing owl. Rodent control activities could result in direct and secondary poisoning of burrowing owl ingesting treated rodents.

Evidence impact would be significant: Project impacts may continue to result in substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Adverse impacts to burrowing owl may occur because the materials provided do not condition take avoidance surveys prior to Project

operations including but not limited to ground and vegetation disturbing activities and rodent control activities.

Mitigation Measure 1:

To reduce Project impacts to burrowing owl to less than significant, CDFW recommends that the Project adhere to CDFW's March 7, 2012 [Staff Report on Burrowing Owl Mitigation](#) as a reference. All survey efforts should be conducted prior to any Project habitat disturbance to soil, vegetation, or other sheltering habitat for burrowing owl.

Mitigation Measure 2:

Permanent impacts to occupied burrowing owl burrows and adjacent foraging habitat should be mitigated for by setting aside replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity. CDFW recommends the City require a burrowing owl mitigation plan be submitted to CDFW for review and approval prior to Project implementation.

Mitigation Measure 3:

Project use of rodenticides that could result in direct or secondary poisoning to burrowing owl should be avoided.

Comment #5: Foothill Yellow-Legged Frog State Status

Section: Appendix C Special-Status Species

Issue: Appendix C of the draft EIR identifies that foothill yellow-legged frog is a state species of special concern. However, foothill-yellow legged frog clades are listed under CESA. On December 11, 2019, Fish and Game Commission listed the Southwest/South Coast, West/Central Coast, and East/Southern Sierra clades of foothill yellow-legged frog as endangered and listed the Northeast/Northern Sierra and Feather River clades as threatened (Fish and Game Commission 2019).

Recommendation:

CDFW recommends that the state listing status of foothill yellow-legged frog be revised to indicate that the Southwest/South Coast, West/Central Coast, and East/Southern Sierra clades of foothill yellow-legged frog are state endangered, and the Northeast/Northern Sierra and Feather River clades are state threatened within the EIR.

Comment #6: Tricolored Blackbird State Status

Section: Appendix C Special-Status Species

Issue: Appendix C of the draft EIR identifies that tricolored blackbird is a state candidate threatened species and a state species of special concern. However, on April 19, 2018, Fish and Game Commission listed tricolored blackbird as threatened under CESA, and regulation went into effect on March 18, 2019 (California Fish and Game Commission 2018).

Recommendation:

CDFW recommends that the state listing status of tricolored blackbird is revised to indicate that tricolored black bird is a state threatened species under CESA and state species of special concern.

Comment #7: Impacts to Sensitive Plant Species

Section: Appendix C Special-Status Species

Issue: CDFW considers plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). The final EIR should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from project-related direct and indirect impacts.

Pursuant to Fish and Game Code Section 1940, CDFW maintains a vegetation mapping standard for the state (FGC § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at <http://vegetation.cnps.org/>. In order for the EIR to determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

CDFW considers natural communities with ranks of S1-S3 to be sensitive natural communities that should be addressed in CEQA (CEQA Guidelines § 15125[c]). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences.

Specific impact: Due to Project related activities, such as the construction of sediment retention basins, vegetated filter strips, riparian buffer areas, installation of efficient irrigation systems, runoff management features (e.g., swales), bioreactors, establishment of riparian vegetation that would require existing agricultural crop/vegetation removal, tilling, and planting of new vegetation, the Project may result in a substantial adverse effect, either directly or indirectly, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or the USFWS.

Why impact would occur: Take of special status plant species, including state- and federally- listed species, may occur without adequate detection, avoidance and mitigation measures.

Evidence impact would be significant: Impacts to special status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. To fully mitigate for take of plants listed under CESA, or rare plants listed

under the Native Plant Protection Act (Fish & G. Code §1900 *et seq.*), further consultation with CDFW may be required.

Recommendation:

CDFW recommends conducting a spring survey for sensitive/rare plants on-site and disclosing the results in the final EIR.

Mitigation Measure 1:

CDFW recommends avoiding any Sensitive Natural Communities found on or adjacent to the Project. If avoidance is not feasible, CDFW recommends mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities. This ratio is for the acreage and the individual plants that comprise each unique community.

Mitigation Measure 2:

If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant species designated as rare, endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subds. [b], [c]). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

Comment #8: Impacts to CESA-Listed Species

Section: Appendix C Special-Status Species

Issue: CDFW considers adverse impacts to special status species protected by CESA and the federal Endangered Species Act (ESA) (16 U.S.C. §1531 *et seq.*), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any state endangered, threatened, candidate species, or listed rare plant species pursuant to the Native Plant Protection Act that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill".

Specific Impacts: The Project has the potential to impact tricolored blackbird (state candidate listing), Swainson's hawk, San Joaquin kit fox, and California tiger salamander. Project related activities, such as the construction of sediment retention basins, vegetated filter strips, riparian buffer areas, installation of efficient irrigation systems, runoff management features (e.g., swales), bioreactors, establishment of riparian vegetation that would require existing agricultural crop/vegetation removal, tilling, and planting of new

vegetation, could lead to the direct or indirect mortality of listed animal and/or plant species.

Why impact would occur: Take of state- and federally- listed species, may occur without adequate detection, avoidance and mitigation measures.

Evidence impacts would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species protected under CESA.

Recommendation 1:

CDFW considers a Swainson's hawk nest site to be active if it was used at least once within the past five years and impacts to suitable habitat or individual birds within a five-mile radius of an active nest as significant. The Project could potentially contribute to the abandonment of an active nest and/or the loss of significant agricultural foraging habitat for a given nest territory and thus result in "take" as defined under CESA. CDFW recommends conducting focused surveys for Swainson's hawk. If take of Swainson's hawk would occur from Project construction or operation, an ITP would be required for the Project.

Recommendation 2:

Any removal of existing crops should include preconstruction tricolored blackbird surveys and assess the potential impacts of the removal of suitable tricolored blackbird habitat. The California Fish and Game Commission acted at its April 19, 2018 meeting in Ventura, CA on the petition to list tricolored blackbird as a threatened species pursuant to sections 2075 and 2075.5 of the Fish and Game Code. Tricolored blackbirds are found year-round in cismontane southern California and have been documented to nest in much smaller colonies than the typical central/northern California mega colonies on farmland. Nesting takes place in native emergent marshes, silage and other grain fields, thickets of the introduced Himalayan blackberry, thistle, and other flooded and upland habitats. Most nesting colonies are in cattail marshes but may also be in blackberry thickets or stands of black mustard. CDFW recommends conducting focused surveys for tricolored blackbird. If take of tricolored blackbird would occur from Project construction or operation, an ITP would be required for the Project.

Recommendation 3:

If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant or animal species designated as rare, endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an ITP or a consistency determination in certain circumstances, among other options (Fish & G. Code §§ 2080.1, 2081, subds. [b],[c]). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring

and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

Comment #9: Sediment Basins

Section: 3.3 Biological Resources, Impact BIO-1

Issue: The use of sediment retention basins may cause indirect impacts to special-status species.

Evidence the impact would be significant: If sediment retention basins are not constructed properly, the failure of these structure may cause substantial sediment issues by delivering large sediment loads to streams. Artificial water sources (e.g., ponds and retention basins) may also become breeding habitat for invasive species such as the American bullfrog, which prey on native species including California red-legged frogs and foothill yellow-legged frogs (Kiesecker et al. 2001, Fuller et al. 2011, Moyle 1973, Kiesecker and Blaustein 1997, 1998, Kupferberg 1997). Also, the presence of artificial water sources can increase the spread of invasive Argentine ants which displace native invertebrates (Human and Gordon 1997, Holway et al. 2002).

Recommendation 1:

CDFW recommends that individual projects develop a Non-Native Species Management Plan in coordination with a qualified biologist to prevent non-native species from establishing within and surrounding the retention basins.

Recommendation 2:

CDFW recommends minimizing night lighting near retention basins to minimize frog attraction.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link:

http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the

Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist Central Coast Water Board in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Karen Carpio, Senior Environmental Scientist at (916) 376-8653 or Karen.Carpio@wildlife.ca.gov.

Sincerely,



Fernando Galli
Acting Chief

cc: Office of Planning and Research, State Clearinghouse, Sacramento

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REFERENCES

- California Fish and Game Commission Notice of Findings for Foothill Yellow-Legged Frog (*Rana boylei*), March 10, 2020
- California Fish and Game Commission Notice of Findings for Tricolored Blackbird (*Agelaius tricolor*), April 19, 2018
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