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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



February 27, 2024

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Governor's Office of Planning & Research

**Feb 28 2024**

**STATE CLEARINGHOUSE**

Subject: Sly Park Intertie Improvements Project  
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
SCH No. 2023020081

Dear Doug Venable:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from El Dorado Irrigation District for the Sly Park Intertie Improvements Project (Project) pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise 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 (Fish & G. Code, § 1802.). Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public

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<sup>1</sup> 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.

## Sly Park Intertie Improvements Project

February 27, 2024

Page 2 of 11

agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act 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 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**

The Project site is located 1.5 southwest of Pollock Pines and 10 miles east of the city of Placerville, California. The project proponent is El Dorado Irrigation District (Proponent). The Project consists of the replacement of 4.5 miles of an existing 22 to 24-inch diameter steel pipeline with a concrete mortar steel pipeline ranging from 12 to 36-inches in diameter. The pipeline would primarily be located within the existing pipeline alignment, but there would be several deviations. This pipeline would convey water from El Dorado Irrigation District's Reservoir 1 to Reservoir A. A treatment plant and pump station would be constructed at Reservoir A. Construction activities would involve excavation and streamflow diversion at four creek crossings (North Fork Weber Creek, South Fork Weber Creek, North Fork Clear Creek, and Clear Creek) and one drainage crossing near a culvert on Starks Grade Road. Project activities at each crossing involve vegetation clearing and trenching for pipeline removal and placement.

### **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the Proponent in adequately identifying and, where appropriate, 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 with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project.

#### **COMMENT 1: Impacts to Foothill Yellow-legged Frog**

*Section 3.8 Biological Resources, page 3.8.7.5*

**Issue:** Construction activities will occur at four creek crossings and one drainage crossing within the project area. The DEIR indicates that the project area is within the range of the East/Southern Sierra clade (South Sierra Distinct Population Segment) of foothill yellow-legged frog (*Rana boylei*; FYLF); this clade is state and federally endangered. A season of operation that completely avoids FYLF presence does not

## Sly Park Intertie Improvements Project

February 27, 2024

Page 3 of 11

exist; therefore, FYLF may be encountered in various life stages year-round. The DEIR describes that a Qualified Biologist will conduct visual encounter surveys for FYLF prior to construction but does not provide sufficient detail on survey methods or timing.

Per our recommendations below, a Qualified Biologist is defined as a person who is knowledgeable and experienced in the biology, life stages, natural history and identification of local fish and wildlife resources present at the project site.

**Recommendation 1.1:** CDFW recommends the Proponent provide additional detail on FYLF bioassessment survey methods and timing. The Proponent should review CDFW's Considerations for Conserving the Foothill Yellow-Legged Frog available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline>.

To increase the likelihood of detection, surveys should include at least one visual encounter survey (VES) during the breeding and/or oviposition period (generally April–June), a tadpole survey four to eight weeks after the breeding survey(s), and a subadult survey in late summer/early fall (generally late August–early October). VES conducted during the late summer are often the easiest method for determining presence (generally late August to early October);<sup>2</sup> subadults and occasionally adults are often observed along river margins, and subadult and adult frogs will likely also be observed in tributary streams (Crump and Scott 1994).

If any survey fails to detect FYLFs within suitable habitat, a follow-up survey should be conducted two to four weeks after the initial survey.

**Recommendation 1.2:** CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, including FYLF, pursuant to CESA. Regardless of whether FYLF are detected during the bioassessment surveys (described above in Recommendation 2.1), CDFW recommends the Proponent prepare a Pre-Construction Survey Plan (Plan) for FYLF and submit it to CDFW for review at least 30 calendar days prior to commencing ground-disturbing or in-water work activities.

A Qualified Biologist should develop the Plan for FYLF. Prior to preparing the Plan, CDFW recommends the Proponent review CDFW's Considerations for Conserving the Foothill Yellow-Legged Frog available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline>. CDFW recommends the following survey and species considerations be incorporated into the Plan and final EIR:

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<sup>2</sup> Frogs are ectothermic, so ambient temperature affects the likelihood of detection. Whether the life form is larval or subadult, both stages will shelter in place under substrate and emerge and become active with warmth (i.e., detection probability increases with temperature).

## Sly Park Intertie Improvements Project

February 27, 2024

Page 4 of 11

- a. The Plan should include what life-stage(s) shall be surveyed for, survey method(s), and timing of survey(s).
- b. The Plan should provide justification for timing and methodology of survey design (e.g., watershed characteristics, regional snowpack, timing and rate of spring runoff, day length, average ambient air and water temperatures, local and seasonal conditions).
- c. If the project site has suitable frog breeding habitat, the Plan should include performing egg mass/larval surveys.

Within 3 to 5 calendar days prior to ground-disturbing and in-water activities at the project site, the Qualified Biologist should perform a pre-construction survey, as specified in the Plan, within the boundaries of the project site, plus a minimum 500-foot buffer zone upstream and downstream of the project site. The survey should include a description of any standing or flowing water. The Proponent should provide Pre-Construction Survey results, notes, and observations to CDFW prior to commencing ground disturbing and in-water activities. Conducting surveys prior to maintenance work may allow avoidance of incidental take.<sup>3</sup> If the Proponent encounters any life stages of FYLF during pre-construction surveys, ground-disturbing or in-water activities, work should be suspended at the project site, and CDFW should be notified within 24 hours. Work may not re-initiate in the project site until the Proponent demonstrates compliance with CESA.

**Recommendation 1.3:** CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the CESA. Pending results of the surveys described above, CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (Fish & G. Code § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, including FYLF, either through construction or over the life of the Project. No relocation shall be done for special status species or CESA listed species without the proper handling permits and/or CESA take coverage (e.g., an ITP).

Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code § 2081 (b)). To facilitate the issuance of an ITP, if applicable, CDFW recommends the EIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the

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<sup>3</sup> As defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.).

Sly Park Intertie Improvements Project

February 27, 2024

Page 5 of 11

U.S. Fish and Wildlife Service to coordinate specific measures if both state and federally listed species may be present within the Project vicinity.

**COMMENT 2: Impacts to California Red-legged Frog**

*Section 3.8 Biological Resources, page 3.8.7.4*

**Issue:** Mitigation Measure BIO-04 describes actions that the Proponent will take to minimize impacts to California red-legged frog (*Rana draytonii*; CRLF) and suitable habitat. CRLF are federally threatened and a California Species of Special Concern. The DEIR states that a Qualified Biologist will conduct surveys for CRLF prior to construction but does not specify when these surveys will occur. Additionally, the DEIR describes actions the Proponent will take to prevent CRLF entrapment but does not explicitly mention exclusionary fencing.

**Recommendation 2.1:** CDFW recommends the Proponent consult United States Fish and Wildlife Service (USFWS) CRLF survey protocol when developing CRLF surveys, available at <https://www.fws.gov/media/revised-guidance-site-assessments-and-field-surveys-california-red-legged-frog>.

**Recommendation 2.2:** CDFW recommends the following language be added to BIO-04 to minimize impacts to CRLF:

Prior to construction, the project site should be surveyed for special-status amphibians (i.e., CRLF) by a Qualified Biologist.

In addition to the USFWS survey protocol recommended above, within 3 to 5 calendar days prior to ground-disturbing and in-water activities at the project site, the Qualified Biologist should perform a pre-construction survey within the boundaries of the project site, plus a minimum 500-foot buffer zone upstream and downstream of the project site. If the result of the surveys above are negative, work may begin as scheduled, however if special-status amphibians are found during any survey, work may not begin until consultation occurs with the Qualified Biologist in determining appropriate avoidance and minimization measures.

If CRLF are found in the project area, CDFW recommends adding an avoidance and minimization measure to include the installation of exclusionary fencing. After installation of exclusionary fencing, the Qualified Biologist should inspect the project area and fencing daily, prior to the commencement of activities. If the Qualified Biologist determines that CRLF and other special status species have been successfully excluded from the work area, then equipment or materials may be moved onto the work site under the observation of the Qualified Biologist.

Sly Park Intertie Improvements Project

February 27, 2024

Page 6 of 11

**COMMENT 3: Impacts to Northwestern Pond Turtle,**  
*Section 3.8 Biological Resources, page 3.8.7.5*

**Issue:** The DEIR states that a Qualified Biologist will conduct visual encounter surveys for northwestern pond turtle (*Actinemys marmorata*) prior to construction but does not provide detail on survey methods or timing.

**Recommendation:** CDFW recommends the following language be added to Mitigation Measure BIO-05 to clarify survey details and minimize impacts to northwestern pond turtle:

Prior to ground-disturbing and in-water activities, a Qualified Biologist should survey the project site where suitable habitat (including nest sites) occurs for northwestern pond turtle. Surveys shall be performed within 30 days prior to starting project activities and should be performed within 500 feet upstream and downstream of the project activity where accessible. If detected during surveys, a site-specific avoidance, minimization, and/or relocation plan should be prepared and implemented by a Qualified Biologist. The plan should include daily construction monitoring. The plan should be submitted to CDFW.

**COMMENT 4: Impacts of Tree Removal on Nesting Birds**  
*Section 3.8.7 Biological Resources Mitigation, page 3.8.7.7*

**Issue:** The Project would result in the removal of approximately 615 Sierra mixed conifer and hardwood trees. Removal of these trees could result in significant habitat loss for a variety of bird species such as white-headed woodpecker (*Leuconotopicus albolarvatus*), redbreasted nuthatch (*Sitta canadensis*), black-headed grosbeak (*Pheucticus melanocephalus*), song sparrow (*Melospiza melodia*), red-tailed hawk (*Buteo jamaicensis*), Cooper's hawk (*Accipiter cooperii*), great horned owl (*Bubo virginianus*), spotted owl (*Strix occidentalis occidentalis*), Northern goshawk (*Accipiter gentilis*), and other nesting raptors and migratory birds. The significance of the impact of habitat clearing is not reduced by virtue of the abundance of similar or equivalent habitat adjacent to the project site. The Project would reduce available habitat for wildlife, potentially including special-status species.

Migratory non-game native bird species are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.). In addition, §§ 3503, 3503.5, and 3513 of the Fish & G. Code also afford protective measures as follows:

- § 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish & G. Code or any regulation made pursuant thereto.
- § 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or

## Sly Park Intertie Improvements Project

February 27, 2024

Page 7 of 11

destroy the nest or eggs of any such bird except as otherwise provided by Fish & G. Code or any regulation adopted pursuant thereto.

- § 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

**Recommendation:** CDFW recommends that the DEIR fully evaluate the impacts of tree removal on wildlife. CDFW also recommends the Proponent propose mitigation for the impact of tree removal during project activities to ensure no net loss of habitat or fish and wildlife resource value occurs because of the Project. Mitigation would serve to offset the impacts of the tree removal and/or habitat loss. Mitigation may include restoring, enhancing, or preserving similar habitat types proposed for removal at higher ratios than those that were removed to compensate for tree removal and/or habitat loss. CDFW recommends that all mitigation measures be actionable and have established performance measures.

### **COMMENT 5: Nesting Bird Surveys and Buffers**

*Section 3.8.7 Biological Resources Mitigation, page 3.8.7.7*

**Issue:** Mitigation Measure BIO-07 describes measures related to no-disturbance buffers around active nest sites. Additional detail is needed related to buffer determination. It is the Proponent's responsibility to comply with Fish and Game Code §§ 3503, 3503.5, and 3513 (listed above in Comment 4), regardless of the time of year.

**Recommendation:** CDFW recommends that the spatial extent of these buffers be determined by a Qualified Biologist. The appropriate spatial extent of buffers will depend on the species present, the level of noise or construction disturbance, levels of ambient (i.e., existing background) noise and other disturbances, line of sight between the nest and the disturbance, and other topographic or artificial barriers.

### **COMMENT 6: Lake and Streambed Alteration Notification**

*Section 2.5 Project Description, page 2.5.2*

**Issue:** The DEIR describes construction occurring at four creek crossings and one drainage crossing, with activities involving excavation and streamflow diversion. CDFW believes these activities may trigger a Notification for a Streambed Alteration Agreement. § 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

## Sly Park Intertie Improvements Project

February 27, 2024

Page 8 of 11

- a. Substantially divert or obstruct the natural flow of any river, stream, or lake;
- b. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- c. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the environmental document should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the project may avoid or reduce impacts to fish and wildlife resources. LSA Notifications must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

**Recommendation:** CDFW recommends that the Proponent notify pursuant to Section 1602 of the Fish and Game Code as early as possible to determine if an LSA is needed.

### **COMMENT 7: Sensitive Plant Communities**

*Section 3.8.7 Biological Resources Mitigation, page 3.8.7.1*

**Issue:** CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. The DEIR document identified sensitive plant communities near the project area but does not provide adequate details regarding the protection of sensitive plant communities. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the California Natural Diversity Database at <https://wildlife.ca.gov/Data/CNDDDB>.



## Sly Park Intertie Improvements Project

February 27, 2024

Page 9 of 11

The Native Plant Protection Act (NPPA) (Fish & G. Code § 1900 et seq.) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of state-listed rare and/or endangered plants due to Project activities may only be permitted through an Incidental Take Permit (ITP) or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, § 786.9 subdivision (b). Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may nevertheless meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).).

**Recommendation:** The Final EIR should include species-specific measures to fully avoid and otherwise protect sensitive plant communities and/or any state-listed plant species from Project-related direct and indirect impacts.

### **COMMENT 8: Biological Resources Awareness Training**

*Section 3.8.7 Biological Resources Mitigation, page 3.8.7.2*

**Issue:** Mitigation Measure BIO-02 states that Project personnel will be trained at Project kickoff and will be provided with printed handouts for future reference. BIO-02 also states that “personnel that are trained during the Project kickoff shall be responsible for making sure that other workers on the Project receive the training before initiating on-site work”. CDFW finds this measure insufficient.

**Recommendation:** CDFW recommends that a Qualified Biologist be responsible for providing all biological resource training. Any additional training occurring after Project kickoff should not be deferred to other Project personnel. All individuals employed or otherwise working on the project site should be trained by the Qualified Biologist prior to performing any work on-site. Training should consist of an in-person presentation from the Qualified Biologist that includes a discussion of the biology of the habitats and species identified in the DEIR and present at the site. The Qualified Biologist should also include as part of the education program information about the distribution and habitat needs of any special status species that may be present, legal protections for those species, penalties for violations and project-specific protective measures. Interpretation should be provided for non-English speaking personnel (if present).

### **COMMENT 9: Mitigation Measures**

**Issue 9.1** CEQA Guidelines § 15126.4 (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. The DEIR lists a number of mitigation measures for biological resources that rely on future approvals or agreements as a means to bring identified significant environmental effects to below a level of significance. Because there is no guarantee that these approvals or cooperation with all of the involved entities will ultimately occur, the mitigation measures are unenforceable and do not reduce the impacts to biological resources to a less-than-significant level.

## Sly Park Intertie Improvements Project

February 27, 2024

Page 10 of 11

**Recommendation 9.1:** Mitigation measures should describe when the mitigation measure will be implemented and indicate the measure's feasibility. Mitigation measures should not rely on uncertain, future approvals or agreements. CDFW recommends that the EIR include measures that are enforceable and do not defer the details of the mitigation to the future.

**Issue 9.2:** Mitigation measures presented in the EIR do not include performance standards; this makes enforcement and evaluation of mitigation impossible.

**Recommendation 9.2:** Mitigation measures should establish performance standards to evaluate the success of the proposed mitigation and must commit the lead agency to successful completion of the mitigation.

**Issue 9.3:** The use of relocation, salvage, and/or transplantation as the sole mitigation measure for impacts to rare, threatened, or endangered species is generally experimental in nature and largely unsuccessful.

**Recommendation 9.3:** Due to the experimental nature of relocation, salvage, and transplantation, the EIR should consider a range of options to avoid, minimize, and mitigate impacts to rare, threatened, and endangered species. Additional options for mitigation include habitat restoration, conservation, and/or preservation.

### EDITORIAL COMMENTS

Page 137 contains a numbered list of mitigation measures. However, one of the numbered items does not contain any text.

### 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 (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov).

### 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

Sly Park Intertie Improvements Project

February 27, 2024

Page 11 of 11

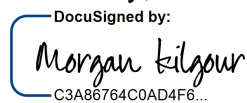
operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

**CONCLUSION**

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to [R2CEQA@wildlife.ca.gov](mailto:R2CEQA@wildlife.ca.gov).

CDFW appreciates the opportunity to comment on the DEIR for the Sly Park Intertie Improvements Project to assist El Dorado Irrigation District in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Alyssa Obester, Senior Environmental Scientist Specialist, at [alyssa.obester@wildlife.ca.gov](mailto:alyssa.obester@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
C3A86764C0AD4F6...

Morgan Kilgour  
Regional Manager

ec: Ian MacLeod, Senior Environmental Scientist (Supervisory)  
Alyssa Obester, or Senior Environmental Scientist (Specialist)  
*Department of Fish and Wildlife*

**References**

Crump, M. L. and N. J. Scott, Jr. 1994. Visual encounter surveys. 84-92 in Heyer, W.R., Donnelly, M.A., McDiarmid, R.W., Hayek, L.-A.C., & M.S. Foster, (eds.): Measuring and monitoring biological diversity. Standard methods for amphibians. Washington & London, Smithsonian Institution Press, 364 p.