Memo

PO Box 5022
128 Market Street, Suite 3E
Stateline, NV 89449
775.446.0570

Date: March 19, 2026

To: Scott Cecchi, Project Manager, California Tahoe Conservancy

From: Joshua Boldt, Senior Botanist
Steve Henderson, Senior Wildlife Biologist

Subject: Technical Assessment of Biological Resources for the Van Sickle Bi-State Park Safety and Equitable Access Improvements Project

INTRODUCTION

This memorandum presents the results of a biological resources technical assessment for the Van Sickle Bi-State Park (park) Safety and Equitable Access Improvements Project (Modified Project), which includes modifications to the original Van Sickle Bi-State Park project evaluated in the Van Sickle CA/NV Bi-State Park Initial Study/Negative Declaration/Expanded Initial Environmental Checklist (IS/ND/IEC) (Conservancy 2009). Previously completed protocol-level surveys conducted for American goshawk, California spotted owl, Sierra Nevada yellow-legged frog, and rare plants for the 2009 IS/ND/IEC have expired. The primary purpose of this assessment is to: 1) summarize information for existing biological resources within and in the vicinity of the Modified Project, 2) identify whether some of the previously completed protocol-level surveys would need to be repeated prior to environmental review or project construction, and 3) determine whether surveys for other species or resources would be needed. This memorandum is also intended to support the forthcoming preparation of required California Environmental Quality Act (CEQA) and Tahoe Regional Planning Agency (TRPA) environmental review documentation as well as any other regulatory compliance efforts that may be needed to proceed with the proposed project. Conclusions about impact significance are provided in the CEQA document.

In December 2024, an initial biological resources technical memorandum was prepared for the original proposed project and submitted to the California Tahoe Conservancy (Conservancy), based on surveys conducted within the original project footprint. Following submittal of the 2024 memorandum, the project footprint was revised and expanded, and additional reconnaissance-level biological surveys were conducted in October 2025 to address the modified and newly included areas. The combined survey extent – encompassing both the original project footprint surveyed in 2024 and the additional areas surveyed in 2025 – is referred to herein as the Study Area.

Subsequently, the project was further refined, resulting in the current Modified Project Area, which is entirely within, but not identical to, the Study Area. The Study Area includes adjacent lands outside the Modified Project Area to provide environmental context and support a comprehensive characterization of biological resources. However, consistent with CEQA requirements, the impact analysis presented in this technical memorandum is limited to activities and potential effects within the Modified Project Area.

DATA SOURCES

The information and analysis presented in this memorandum is focused on special-status species, wildlife habitats, vegetation communities, and potentially jurisdictional waters of the US and of the state that occur or have the potential to occur within or adjacent to the Modified Project Area. The results of the assessment are based upon literature review and database queries as well as reconnaissance-level surveys conducted within the Study Area. The sources of reference data reviewed for this evaluation included the following:

- Van Sickle CA/NV Bi-State Park IS/ND/IEC (California Tahoe Conservancy 2009);
- South Lake Tahoe USGS 7.5-minute topographic quadrangle;
- Google Earth aerial photographs of the project area (Google Earth 2025);
- US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) System (USFWS 2025a) (see Attachment A);
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) list of special-status species occurrences within the South Lake Tahoe and seven surrounding USGS 7.5-minute topographic quadrangles (Echo Lake, Emerald Bay, Freel Peak, Glenbrook, Meeks Bay, Minden, and Woodfords) (CDFW 2025a) (see Attachment A);
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants known to occur within the South Lake Tahoe and seven surrounding USGS 7.5-minute topographic quadrangles (CNPS 2025a) (see Attachment A);
- GIS occurrence data for TRPA special interest wildlife and sensitive plant species (TRPA 2025);
- National Wetlands Inventory (USFWS 2025b);
- US Geological Survey (USGS) National Hydrography Dataset (USGS 2025); and
- Western Monarch and Milkweed Occurrence Database (WMMOD 2018)

SURVEY METHODOLOGY

Prior to conducting the field survey, available information regarding biological resources in the vicinity of the Study Area was gathered and reviewed, including information on special-status plant and wildlife species with the potential to occur in the vicinity of the Study Area. Queries of the CNDDB, CNPS, and USFWS IPaC databases were conducted prior to the surveys. Lists of special-status plant and wildlife species with the potential to occur in the Study Area were developed based on the review of existing information, as identified above. These lists were used to focus the area of investigation on the special-status species and associated habitats with the potential to be present within the Study Area.

Biological resources within the Study Area were evaluated through field reconnaissance and habitat assessment surveys conducted on August 7 and October 8, 2024; and October 24 and 31, 2025. The surveys were conducted by walking the Study Area and recording existing habitat types, plants, and wildlife species within this area. Plant communities and wildlife habitats were identified using aerial photo interpretation and field reconnaissance. Prior to the field surveys, special-status species characteristics and habitat requirements were reviewed to aid in field recognition of suitable habitats. During the surveys, habitats were evaluated for their potential to support special-status species and the presence of any other biologically sensitive resources such as wetlands, riparian habitat, or drainages. While a formal aquatic resources delineation was not conducted, potential wetlands and other waters of the US and state were noted within the Study Area based on field observations and aerial photography interpretation. No focused or protocol-level surveys for special-status species were conducted.

EXISTING CONDITIONS

WILDLIFE HABITATS

Sierran Mixed Conifer Forest

Sierran mixed conifer forest is the most prevalent habitat type throughout much of the Study Area. Jeffrey pine (*Pinus jeffreyi*) is the dominant species found in varying densities in the upper canopy layer of this habitat type, with white fir (*Abies concolor*) also occurring. The understory consists of a variety of shrubs, grasses, and forbs, including green-leaf manzanita (*Arctostaphylos patula*), mountain whitethorn (*Ceanothus cordulatus*), Sierra chinquapin (*Chrysolepis sempervirens*), and tobacco brush (*Ceanothus velutinus*). Big sagebrush (*Artemisia tridentata*), antelope bitterbrush (*Purshia tridentata*), and rubber rabbitbrush (*Ericameria nauseosa*) are found in openings in the forest.

Montane Riparian Scrub

Patches of montane riparian habitat exist within the overall Sierran mixed conifer habitat and within and adjacent to the meadow complex (described below). Montane riparian habitat is composed of broad-leafed deciduous trees and shrubs. This habitat type is dominated by willow, specifically Scouler's willow (*Salix scouleriana*), Lemmon's willow (*Salix lemmonii*), and mountain alder (*Alnus incana*), with interior rose (*Rosa woodsii*) and currant (*Ribes* sp.) occurring in the shrub layer. A variety of grasses and forbs are found in the understory, including blue wildrye (*Elymus glaucus*), meadow barley (*Hordeum brachyantherum*), thimbleberry (*Rubus parviflorus*), rushes (*Juncus* spp.), and sedges (*Carex* spp.). This habitat occurs in discontinuous patches along the existing roadway and in areas with a higher water table as well as in patches within the wet meadow and as a narrow strip adjacent to the intermittent channel.

Perennial Grassland Meadow

A large meadow complex occurs just south of the existing entry road to the park (within the Study Area but outside the Modified Project Area). This meadow is a mosaic of wetland (described below) and upland habitats. Perennial grassland habitat in the project area is dominated by perennial grasses such as Idaho bentgrass (*Agrostis idahoensis*) and slender wheatgrass (*Elymus trachycaulus*) and dry sedges (*Carex* spp.). This habitat occurs in the drier portions of meadow.

Wet Meadow

Wet meadows at all elevations generally have a simple structure consisting of a layer of herbaceous plants. Shrub or tree layers are usually absent or very sparse; however, they can be an important feature of the meadow edge. Wet meadow habitat type within the Study Area is characterized by sedges (*Carex* spp.), rushes (*Juncus* spp.) tufted hair grass (*Deschampsia caespitosa)*. Shrubs and small trees including Lemmon's willow and aspen (*Populus tremuloides*) occur in patches along the wetland edge and along the intermittent creek channel that flows through the meadow complex. This habitat type occurs within the Study Area but outside the Modified Project Area.

ANALYSIS AND RECOMMENDATIONS

STATE AND FEDERAL PROTECTED AQUATIC RESOURCES

Analysis

In California, aquatic resources are regulated under several federal and state laws and regulations, including the federal Clean Water Act (CWA), the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (State Wetland Procedures), and California Fish and Game Code.

A formal delineation of potentially jurisdictional wetlands and other waters of the US and/or state within the Study Area has not been conducted. However, based on the reconnaissance surveys, potentially jurisdictional aquatic resources occur within the Study Area, but outside the Modified Project Area. Potentially jurisdictional aquatic resources within the Study Area comprise areas of montane riparian and wet meadow habitat. These areas support several hydrophytic plant species, including Scouler's willow (wetland indicator status FAC[1]), Lemmon's willow (FACW), mountain alder (FACW), meadow barley (FACW), tufted hairgrass (FACW), rushes (FACW-OBL), and sedges (FACW-OBL).

CLEAN WATER ACT ANALYSIS

The montane riparian and wet meadow habitat features in the Study Area support a predominance of hydrophytic species and may meet the CWA criteria of a wetland, depending on site-specific soils and hydrologic conditions. Under the CWA, wetlands must typically exhibit three parameters: (1) wetland hydrology, (2) hydrophytic vegetation, and (3) hydric soils to meet the federal definition of a wetland. As noted, montane riparian and wet meadow habitats in the Study Area support a predominance of hydrophytic species, although scientific data on the soil and hydrology of these features was not collected during the reconnaissance survey. However, easily observable evidence of wetland hydrology was investigated. The current definition of waters of the United States requires that jurisdictional wetlands be adjacent to and have a continuous surface connection with a water of the United States.

For the features north of the existing entry road (within the Modified Project Area), no obvious indications of adjacency or continuous surface connections to waters of the US were observed during the reconnaissance survey, and no evidence of wetland hydrology was observed. Therefore, these features would not be regulated under the Clean Water Act.

The wet meadow and montane riparian features south of the existing entry road (outside of the Modified Project Area) are drained by an intermittent channel that flows through the meadow complex and drains off the site to the west. This channel may provide adjacency to a downstream water of the United States; therefore, the wet meadow and montane riparian features south of the existing entry road (outside of the Modified Project Area) may be regulated under the Clean Water Act. These features are not expected to be impacted by the Modified Project.

[1] Wetland indicator status denotes the probability of a species occurring in wetland habitats. OBL = Obligate wetland plant – almost always occurs in wetlands under natural conditions (>99% probability). FACW = Facultative wetland plant – usually occurs in wetlands, but occasionally found in non-wetlands (67%-99% probability). FAC = Facultative plant – equally likely to occur in wetlands and non-wetlands (34%-66% probability).

STATE WETLAND PROCEDURES ANALYSIS

These features may qualify as waters of the state and be regulated by the Lahontan Regional Water Quality Control Board (Lahontan RWQCB) under the State Wetland Procedures, The State Water Resources Control Board has adopted the following definition of wetlands:

> *An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater or shallow surface water or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.*

Unlike the current definition of waters of the US, the State Wetland Procedures do not require adjacency or a continuous surface connection for a wetland feature to be considered jurisdictional. The montane riparian and wet meadow habitat features in the Study Area support a predominance of hydrophytic species, although scientific data on the soil and hydrology of these features were not collected during the reconnaissance survey. However, easily observable evidence of wetland hydrology was investigated. For the features north of the existing entry road (within the Modified Project Area), no evidence of wetland hydrology was observed. Therefore, these features would not be regulated under the State Wetland Procedures, However, the wet meadow and montane riparian features south of the existing entry road (outside of the Modified Project Area) did exhibit secondary indicators of wetland hydrology (i.e., saturation visible on aerial imagery) and could potentially support hydric soils. Therefore, the wet meadow and montane riparian features south of the existing entry road may be regulated by the RWQCB under the State Wetland Procedures. These features are not expected to be impacted by the Modified Project.

FISH AND GAME CODE SECTION 1600 ANALYSIS

Pursuant to Division 2, Chapter 6, Section 1600 et seq. of the FGC, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream, or lake that supports fish or wildlife. In addition, CDFW has authority under FGC 1600 et seq. over wetland and riparian habitats associated with lakes and streams. The montane riparian habitats north of the existing entry road (within the Modified Project Area) are not associated with any lakes or streams. Therefore, these features would not be regulated FGC Section 1600 et seq. The montane riparian and wet meadow habitats south of the existing entry road (outside of the Modified Project Area) are associated with an intermittent stream channel. Therefore, it is likely that these features would be regulated FGC Section 1600 et seq. These features are not expected to be impacted by the Modified Project.

Recommendations

As currently designed, the Modified Project would not have any impacts to potentially jurisdictional aquatic resources. As described above, the montane riparian habitat features north of the existing entry road (within the Modified Project Area) would not be regulated under the CWA, State Wetland Procedures, or Fish and Game Code 1600 et seq. The montane riparian and wet meadow habitats south of the existing entry road (outside of the Modified Project Area) are likely to be regulated under the CWA, State Wetland Procedures, and FGC Section 1600 et seq.

However, if project plans are modified and direct impacts to these features are anticipated, prior to any work in potentially jurisdictional aquatic resources, the Conservancy, as project proponent, shall conduct a formal aquatic resources delineation and acquire all applicable wetland and waters permits and, if required by US Army Corps of Engineers, Lahontan RWQCB, and/or CDFW, would adhere to any compensatory mitigation requirements for impacts to wetlands. For wetlands that are jurisdictional under the Clean Water Act, this would be a Clean Water Act Section 404 permit. For wetlands that are jurisdictional under the State Wetland Procedures, this would be a Waste Discharge Requirements permit or a permit to comply with Section 401 of the Clean Water Act from the Lahontan RWQCB. For features regulated under FGC Section 1600 et seq., this would be a Streambed Alteration Agreement from CDFW.

SENSITIVE NATURAL COMMUNITIES AND HABITATS

Analysis

Sensitive habitats include those that are of special concern to resource agencies or are afforded specific consideration through the TRPA Goals and Policies and TRPA Code, CDFW's Sensitive Natural Communities List, Section 404 of the CWA, and other applicable regulations. Sensitive habitats may be of special concern to these agencies and conservation organizations for a variety of reasons, including their locally or regionally declining status, or because they provide important habitat to common and special-status species. Sensitive natural communities are those native plant communities defined by CDFW as having limited distribution statewide or within a county or region and that are often vulnerable to environmental effects of projects (CDFW 2025b). These communities may or may not contain special-status plants or their habitat. CDFW designates sensitive natural communities based on their state rarity and threat ranking using NatureServe's Heritage Methodology. Natural communities with rarity ranks of S1 to S3, where S1 is critically imperiled, S2 is imperiled, and S3 is vulnerable, are considered sensitive natural communities to be addressed in the environmental review processes of CEQA and its equivalents (CDFW 2024). Many riparian plant communities qualify as sensitive natural communities based on the plant associations therein.

Sensitive natural communities are generally identified at the alliance level of vegetation classification hierarchy using the Manual of California Vegetation (CNPS 2025b). The Study Area contains montane riparian and wet meadow habitat (only montane riparian habitat occurs within the Modified Project Area). Scouler's willow, Lemmon's willow, mountain alder, interior rose, and currant were observed in the Study Area in montane riparian habitat, and sedges and rushes were observed in the wet meadow features. Areas dominated by these species may be considered sensitive natural communities if the species assemblage, percent cover, and patch size are sufficient to meet membership rules and sensitive natural community requirements.

Habitats consisting of deciduous trees, wetlands, and meadows (i.e., riparian, wetland, and meadow habitats) are designated by TRPA as habitats of special significance. The TRPA threshold standard for habitats of special significance is nondegradation. Additionally, most wetland and riparian habitats in the Tahoe Basin are also designated as stream environment zone (SEZ), which is a land designation unique to the Lake Tahoe Basin that includes lands that owe their physical and biological characteristics to the presents of surface water or shallow groundwater. SEZs provide a variety of critical functions in the Tahoe Basin, including water quality maintenance through nutrient cycling and sediment retention, flood attenuation, infiltration and groundwater recharge, open space, scenic and recreational enjoyment, wildlife habitat, and wildfire abatement. The TRPA threshold standard for SEZs is to preserve SEZ function, restore all undeveloped SEZ, restore 25 percent of disturbed SEZ, increase SEZ function by 5 percent, and restore wetlands.

A Land Capability Classification was conducted in June 2003 for the previous Van Sickle CA/NV Bi-State Park project. This classification was verified by TRPA in October 2003. This classification shows portions of SEZs or SEZ buffers within the Modified Project Area. The TRPA Code of Ordinances (Code) restricts additional coverage within SEZs and SEZ buffers. However, the Code includes an exception for public outdoor recreation facilities (Code Section 30.5.2).

Recommendations

A qualified biologist should conduct a survey following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* prior to project construction (CDFW 2018). Any sensitive natural communities that may be present within the Modified Project Area) would be mapped by a qualified biologist during this survey.

In addition, if direct impacts to SEZs or SEZ buffers are anticipated, prior to any work in these features, the Conservancy shall acquire all applicable permits from TRPA and, if required by TRPA, would adhere to any mitigation requirements for impacts to SEZs or SEZ buffer (as prescribed by TRPA Code Section 30.5.1.B.5).

SPECIAL-STATUS PLANTS

Analysis

Special-status plant species are defined here as:

- plants listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (50 Code of Federal regulations 17.12);
- plants that are candidates for possible future listing as threatened or endangered under the federal Endangered Species Act;
- plants listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (14 California Code of Regulations 670.2);
- plants listed as rare or endangered under the California Native Plant Protection Act (California Fish and Game Code, Section 1900 et seq.);
- plants that meet the definitions of rare and endangered under the California Environmental Quality Act (CEQA). CEQA Section 15380 provides that a plant or animal species may be treated as "rare or endangered" even if not on one of the official lists (State CEQA Guidelines, Section 15380); and
- plants considered to be "rare, threatened or endangered in California" according to the California Rare Plant Rank 1A, 1B, 2A, 2B, 3, and 4 (CNPS 2025a).

A preliminary list of special-status plant species known or with potential to occur in the Study Area was developed based on a review of the sources listed at the beginning of this chapter. Suitable habitat for eight special-status plant species was observed within the Study Area. Project implementation could result in direct or indirect adverse effects on those special-status plant species, if present in the Modified Project Area.

Recommendations

Special-status plant surveys conducted in the project area in 2002 and 2003 are no longer valid. Therefore, a qualified botanist should conduct protocol-level surveys for special-status plant species with the potential to occur in the Study Area. The survey will follow the methods in the current version of CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the Modified Project and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified botanist).

SPECIAL-STATUS WILDLIFE

Analysis

Special-status wildlife species are defined here as:

- animal species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (ESA; 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species) or candidates for possible future listing as threatened or endangered under ESA (75 CFR 69222);
- species listed or candidates for listing by the State of California as threatened or endangered under CESA (14 Cal. Code Regs., Section 670.5);
- animals fully protected under the California Fish and Game Code (FGC) (Section 3511 for birds, Section 4700 for mammals, Section 5050 for reptiles and amphibians, and Section 5515 for fish);
- species designated as a sensitive, special interest, or threshold species by TRPA (TRPA Code Chapters 61, 62, and 63);
- animals identified by CDFW as species of special concern;
- species considered locally significant, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA Section 15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G); or
- species that otherwise meets the definition of rare or endangered under CEQA Guidelines Section 15380.

The Modified Project is located in an urban area that already experiences substantial human disturbance and noise. Due to existing land uses (e.g., recreation and access infrastructure), disturbances within and adjacent to the Study Area, and the biophysical conditions of habitats, the mixed conifer, riparian, and meadow habitats in the Study Area are not expected to support breeding habitat suitable for any sensitive wildlife species that may be subject to protocol-level surveys. Additionally, the Study Area is not located within any nest buffers or disturbance/threshold zones for TRPA special interest wildlife species (i.e., American goshawk, golden eagle, peregrine falcon, osprey, bald eagle, waterfowl). Therefore, Modified Project implementation is not expected to cause a substantial direct or indirect effect on special-status wildlife species.

Recommendations

Because the Study Area is not expected to support breeding occurrences of any special-status wildlife species or result in substantial direct or indirect effects on these species, no additional focused or protocol-level surveys for special-status wildlife are recommended.

NESTING MIGRATORY BIRDS

Analysis

Mixed conifer, montane riparian, aspen, and meadow habitats in the Study Area provide nesting habitat for some common bird species. Nesting raptors and other birds are protected under California Fish and Game Code and the federal Migratory Bird Treaty Act. The nesting season for most avian species in the Tahoe region is generally considered to be March 1–August 31, depending on species, snowpack, and other seasonal conditions. If nesting

birds are present in the Study Area, construction-related vegetation removal or other ground disturbances during the nesting season could result in direct loss of active nests or disturbance to active nests from auditory and visual stimuli, potentially resulting in abandonment and loss of eggs or chicks.

Recommendations

For vegetation removal and other ground-disturbing activities scheduled to occur during the nesting season (defined here as March 1 to August 31, except where otherwise specified for select species), we recommend that a qualified biologist conduct a preconstruction survey for nesting birds within two weeks prior to the start of Modified Project activities that may disturb nests. If active nests are found, we recommend identifying and implementing an appropriate no-disturbance buffer and limited operating period based on species- and site-specific factors such as the species nesting biology and sensitivity to disturbance, nest location in proximity to construction activities, and ambient noise and other disturbance levels.

REFERENCES

California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. California Department of Fish and Wildlife. Sacramento, CA.

———. 2025a. California Natural Diversity Database (CNDDB) Rarefind 5 computer program (v5.3.0). California Department of Fish and Wildlife Biogeographic Data Branch. Sacramento, CA.

———. 2025b. *Natural Communities List*. Available: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

California Native Plant Society. 2025a. *Inventory of Rare and Endangered Plants* (online edition, v9.5). California Native Plant Society. Sacramento, CA.

———. 2025b. *A Manual of California Vegetation*, Online Edition. Available: http://www.cnps.org/cnps/vegetation.

California Tahoe Conservancy. 2009. *Van Sickle CA/NV Bi-State Park Initial Study/Negative Declaration Expanded Initial Environmental Checklist (IS/ND/IEC).*

CDFW. *See* California Department of Wildlife.

CNPS. *See* California Native Plant Society.

Google Earth. 2025. Available: earth.google.com/web/.

Tahoe Regional Planning Agency. 2025. Tahoe Open Data – Mapping Tools and Datasets. Available: https://data-trpa.opendata.arcgis.com/.

TRPA. *See* Tahoe Regional Planning Agency.

US Fish and Wildlife Service. 2025. IPaC Resource List. Reno Fish and Wildlife Office, Endangered Species Division.

———. 2025b. National Wetlands Inventory. Available: http://fws.gov/wetlands/.

USFWS. *See* US Fish and Wildlife Service.

US Geological Survey. 2025. National Hydrography Dataset. Available: https://www.usgs.gov/national-hydrography/national-hydrography-dataset

USGS. *See* US Geological Survey.

Western Monarch and Milkweed Occurrence Database. 2018. Data accessed from the Western Monarch Milkweed Mapper, a project by the Xerces Society, U.S. Fish and Wildlife Service, Idaho Department of Fish and Game, and Washington Department of Fish and Wildlife. Available: https://www.monarchmilkweedmapper.org.

WMMOD. *See* Western Monarch and Milkweed Occurrence Database.