



Peter R. Baye, Ph.D.
Botanist, Coastal Ecologist
P.O. Box 65
Annapolis, California 95412



(415) 310-5109

baye@earthlink.net

Sonoma County Permit and Resource Management Department
Attn: Steven Dee, David Schiltgen
2550 Ventura Avenue,
Santa Rosa, CA 95403
Via e-mail

May 20, 2009

SUBJECT: Preservation Ranch DEIR scope comments (Buckeye Ranch LLC, Fuller Mountain LLC, Hoover Ridge LC, and Bear Flat LLC, 103 APNs)

Dear Mr. Dee and Mr. Schiltgen:

I am submitting the following written comments to supplement my oral comments at the public DEIR scoping meetings you held in Santa Rosa and Annapolis on April 29 and May 2. I would like to acknowledge that both meetings were successful in meeting the spirit of CEQA public participation, and were well-managed. You explained plainly and clearly the purpose and nature of comments at this stage of the EIR process, and most public comments reflected the objectives of the meetings.

My qualifications to comment: I am an applied ecologist and botanist with over 30 years of professional experience. My current work includes preparation and critical analysis of environmental regulatory documents (EIRs, EISs, biological assessments, Clean Water Act and Endangered Species Act authorizations), and preparation and peer review of comprehensive restoration and management plans for stream, wetland, and terrestrial coastal habitats; regulatory analysis. I formerly worked for the U.S. Army Corps of Engineers, Regulatory Branch (San Francisco), where I managed joint EIR/EISs, conducted endangered species consultations, jurisdictional determinations, and general regulatory project management. I also worked at the U.S. Fish and Wildlife Service, Ecological Services (Endangered Species Division) in Sacramento, where I prepared endangered species recovery plans, conducted endangered species formal consultations, and provided technical services to staff, cooperating agencies, and Service partners. I believe I have substantial technical expertise (including interdisciplinary scientific expertise) in many aspects of environmental analysis of Preservation Ranch. In addition, I am a long-term local full-time rural resident of Annapolis, neighboring (as do all

Annapolis residents) the extraordinarily extensive Preservation Ranch project. I have direct local knowledge and experience of the vegetation, wildlife, soils, and hydrology in northwestern Sonoma County.

My comments are based on relatively thorough review the Initial Study and project background documents, which will be superseded by the DEIR. I am not, however, substantively critiquing the impact analysis of these documents at this stage of CEQA; my substantive comments will be directed at the DEIR when it is available.

Request for clarification. First, however, I request a clarification of a public statement made at the May 2 Horicon School public meeting, for your administrative record. I request that you independently verify whether the comments of Mr. Peter Mattson of Sea Ranch on May 2 (Annapolis, Horicon School meeting), accurately reflect the official policy of Sonoma Land Trust with respect to conservation easements linked to mitigation for Preservation Ranch. My notes indicate contradictory statements from Mr. Mattson regarding his official status representing SLT: he initially stated that he was “speaking as an independent person”, then stated his official position in the SLT Board, and then made a series of statements that declared publicly the interests, preferences, concerns of the SLT Board and himself “as a Board member”. My understanding is that his perspectives were not officially representing either the SLT Board or SLT’s executive office in Santa Rosa.

1. General comments on project description, impact assessment methodology and technical review.

1.1. Stabilization and proper scope of project description. Principal elements of the project description have been presented to the public through various news media in recent years, prior to the PRMD’s acceptance of a full and complete permit application. These elements included residential development (vineyard estates, colloquially “McMansions”) components that have variously been included and withdrawn from the project prior to the issuance of the Initial Study, and prior to compensatory mitigation proposals that were apparently negotiated and developed prior to public review.

The DEIR must stabilize the project description to ensure meaningful public and agency comments. Meaningful public comments are likely to be defeated by a confused or confusing moving target of project description components. The DEIR should analyze all significant impacts due to foreseeable actions and conditions resulting from the authorization of the project, regardless of whether the applicant is currently proposing or disclosing them.

For example, if the parcels are rezoned to allow residential development, and the economics conditions established by the project are likely to substantially increase the likelihood of subsequent residential development (i.e., if the project causes or substantially contributes to financial need, pressure or attractiveness for residential

development, following patterns or history of analogous development elsewhere in California), the DEIR should assume long-term consequences of residential development in impact analysis. To do otherwise would be equivalent to overt project piecemealing, especially for project components that have arbitrarily vacillated in the project description prior to the NOP.

1.2. Feasible, enforceable, reliable and appropriate mitigation measures as part of the project description and DEIR evaluation. The DEIR should be vigilant to exclude (or at least critically evaluate for public review) questionably enforceable or infeasible proposed project mitigation measures. In particular, the DEIR should screen out proposed mitigation measures that are doubtfully within the regulatory authority or capacity of PRMD or state agencies that rely on CEQA. The same scrutiny applies to impermissibly vague or undefined project elements.

For example, if the county or state authorities lack clear, uncontested authority to enforce the exclusive practice of “organic” farming methods on subsequent (future) landowners within the project site who may be unwilling otherwise to forfeit use of pesticides during pest or disease outbreaks, this should not be treated as a certain, feasible project element (or mitigation measure). Similarly, vague or undefined project elements which are proposed to function as mitigation (such as “sustainable” farming) must be specifically defined in terms of site-specific project practices, and be enforceable by PRMD or other CEQA agencies.

I would urge the PRMD also to carefully evaluate mitigation measures in the project description that may embed conflicts of interest. For example, if an organization (whether private or non-profit) is retained to implement mitigation measures, and has vested interest in financial compensation for successful implementation of mitigation measures on which public trust resources depend, that organization should be excluded from monitoring and reporting the efficacy of mitigation or background (baseline) conditions. This issue of conflict of interest is already a concern because of media reports that monitoring and mitigation functions for the project may be implemented by a stakeholder organization that represents vineyard developers, and accepts public restoration funds.

For evaluation of compensatory mitigation measures, the DEIR should analyze the nexus (ecological and legal) between specific impacts to specific resources, and the corresponding mitigation measures. Out-of-kind or “*quid pro quo*” compensatory mitigation measures, such as set-asides, reserves, or “enhanced” environmental quality in general should not be accepted uncritically as panaceas for specific impacts. See comment 1.7 below. The feasibility of implementation of mitigation, and the efficacy of any mitigation measure (including forecasts of “restoration” in the absence of demonstrated long-term results) should be rigorously reviewed.

1.3. Need for long-term, landscape-level analysis of existing (baseline) conditions and impact methodology. The conventional methodology for assessment of existing (baseline) environmental resources and forecasting impacts in CEQA is based on assumptions suitable for projects in relatively well-consolidated unitary project sites, or linear projects like utility lines. Cohesion of project sites is typically dictated by project cost and real estate cost constraints in California. In contrast, the relatively inexpensive and extensive land ownership (depleted forestland inventory, zoned exclusively for forestry) of the Preservation Ranch project breaks with these assumptions. This extensive, irregular and diffuse project “site” is exceptional in its geographic extent (distribution of project construction footprint), geographic complexity of its setting (spanning a wide climate gradient; highly variable topography, geology and soils; vegetation and habitat types, and complexity of indirect and cumulative impacts within and beyond the project area. I believe that there are no comparable precedents for the challenge in CEQA analysis at this geographic scale in Sonoma County, and few or none in California overall.

The DEIR must adapt its methodology to be suitable for the geographic extent and complexity of impacts associated with a nearly 20,000 acre footprint of combined agricultural, road, quarry, reservoir, forestry, and other project elements in the proposal. Landscape ecology and GIS analysis methods should be used as the fundamental framework for analysis of indirect and cumulative impacts, based on sound empirical site-specific and setting-specific data, as well as scientific comparison with comparable long-term studies in landscape ecology of other parts of central or northern California that have undergone conversion of rangeland, oak woodland, and coastal forests to vineyards (e.g. Navarro River, Russian River, Napa River watersheds). I believe that any environmental impact analytic methodology that is not based on GIS/landscape ecology methods with thorough scientific peer review would be grossly deficient for a project of this scale.

The time-frame for impact analysis at the landscape level should consider *long-term trajectories multi-decade (trends over time), not static instantaneous post-project end-states*. These long-term, landscape-level analyses of specific resource impacts and impact interactions (cumulative and indirect impacts pertaining to fish, water quality, water flows, groundwater, wildlife populations, etc.) should be based on a *reasonable range of assumptions regarding likely alternative future states of the landscape* that are difficult to foresee, but are reasonably likely and analyzable. For example, long-term, large-scale impact analysis should include likely environmental regimes or scenarios including variable economic pressures for development, variable demographic pressures or trends, climate (especially rainfall) variability and trends, variable fire history and regimes, etc. Extrapolation of existing (background) static conditions into the future would unreasonably distort impact analysis conclusions. See also comment 1.5.

The conventional impact analysis methods of CEQA for relatively small, confined project areas (narrative overview of existing conditions, qualitative or narrow numeric

predictions of single-factor environmental consequences for static post-project conditions) would be entirely inadequate for a project like Preservation Ranch that literally transforms the landscape of a broad geographic area.

1.4. Statement of project purpose. The construction of an appropriate project purpose is essential to establishing the proper range of alternatives. Project purpose should be determined by PRMD's critical interpretation of the applicant's declared project purpose, without undue bias towards the applicant's proposed project description or site location(s).

Applicants have incentive to frame project purposes to maximize narrowness, reducing the "reasonableness", feasibility, or competitiveness of environmentally superior alternatives – in effect, striving to define the project so narrowly that it is the only one that can meet the statement of purpose. This is of course impermissible in CEQA, but the validity of project purpose statements admit of gradation.

I urge PRMD to frame project purpose very carefully in terms of project size, basic economic aims (grounded in reasonable return on investment), crop type (market-competitive wine grapes rather than specific cultivars), including only those subordinate aims that are essential to a coherent (self-sufficient) and economically viable proposal. I would urge PRMD to seek county counsel review of the project purpose statement after careful consideration of applicable CEQA case law.

1.5. Episodic impacts and risk assessment (high magnitude, low frequency events)
The ecology of the project setting is significantly influenced or driven by high magnitude, low frequency episodic environmental events, such as climate extremes (floods, heat waves, freezes), geomorphic events (landslides, debris flows, slumps, stream channel and bar changes), or eruptive biological population changes (pest and disease outbreaks, wildlife population fluctuations, new non-native species invasions). The accurate prediction of specific environmental impacts in the project area will require consideration of episodic events that are likely to occur or recur within the foreseeable project life period and beyond. Individual impacts to specific resources must consider and adequately analyze the interaction (indirect and cumulative impacts) between episodic background events and project-driven impacts that may be significant, even when the DEIR considers "pure" project-driven impacts to be less than significant. These analyses should assume human management responses that are likely to be undertaken in response to episodic events. Representative examples would include:

- Pesticide, herbicide, fungicide, or soil sterilant impacts associated with project construction or conversion, and under "normal" post-construction operation, and under unusual but foreseeable likely circumstances such as after pest outbreaks or new non-native species population eruptions, considering future landowner discretion;

- Groundwater and stream flow impacts (and indirect impacts to aquatic biota) of runoff capture and well pumping at reasonably foreseeable rates during prolonged extreme droughts or growing-season freezes and frosts;
- Wildfire ignition risks associated with routine maintenance and operation of the project during extreme droughts and heat waves;
- Spill risks of fuel, fertilizer, herbicides, and pesticides based on statewide data and county-wide data.

1.6. Impact interactions (indirect, compound, and cumulative impact analysis)

Significant impact interactions may occur over long time periods (project life or beyond) even when single-factor/single resource analysis of project impacts may indicate a low probability of significant impacts during the project life. The DEIR should identify and analyze the independent environmental or project-dependent variables that may cause significant interactive (indirect, cumulative) impacts for each potential single-factor resource impact. Adequate analysis is likely to require multiple-factor interactions that require complex ecological numeric models. Representative examples include:

- Channel pool habitat availability and suitability for listed salmonid species during droughts and under the influence of macronutrient loading of streams in low flow conditions in agriculturally converted local watersheds;
- Sub-watershed climate impacts of vineyards interacting with clear-cuts (timber harvest plans outside the project area) and persistent unvegetated river bed surfaces associated with instream gravel mining.
- Invasive species pioneer colonization frequency and rate of spread influenced by new construction, maintenance, and operation of agricultural roads
- Road network effects on large mammal dispersal, foraging area, territory patterns influenced by modified fire frequency and distribution in the agriculturally modified landscape, interacting with episodic extreme droughts.
- Foreseeable drought-emergency or frost-emergency exploitation of groundwater resources (permitted or otherwise) to replenish depleted reservoirs.

1.7. Conceptual or predictive ecological model of long-term “baseline” ecological dynamics and trends. The CEQA convention of “freezing” existing conditions as a biological baseline must be enhanced and expanded by consideration of long-term successional trends of vegetation, and vegetation dynamics associated with climate change, pathogen spread, and invasive non-native species over a decadal scale. The need and efficacy of compensatory mitigation measures must be assessed against a dynamic long-term trajectory of change, not arbitrary static conditions.

1.8. Independent scientific and technical peer review – need for formal peer review panel.

At the scoping meetings, you assured the public that that PRMD will not uncritically accept the applicant's (or their agents/consultants) assessment of existing environmental baseline or projected environmental consequences, and will ensure that analysis of significant impacts will be thoroughly peer-reviewed. You also indicated, however, that this scientific peer review would be provided by resource agency staff. This is not sufficient or even feasible for several reasons.

First, resource agency staff levels are likely to be insufficient for the foreseeable future because of simultaneous federal and state budget constraints. Second, even if staffing capacity were not impaired, resource agency staff generally provide interdisciplinary scientific review of CEQA documents under normal staff workloads, but few resource agencies have in-house the specialized scientific expertise necessary to provide scientific peer-review, particularly during periods of above-normal workloads. Third, the massive scale of this project, and its environmental documents, provides an unreasonably large addition to normal or peak workload to resource agency staff.

In view of the unprecedented magnitude, complexity and geographic scale of potential significant impacts associated with the current project location and proposal, it is unreasonable and infeasible to expect or promise adequate scientific peer review from resource agency staff. I intend no disrespect, but PRMD staff are not qualified to provide quality control and quality assurance for the massive multidisciplinary technical document load of this project.

To address the urgent need for adequate scientific peer review of the project impact analysis, I urge PRMD to establish a highly *qualified, independent scientific and technical review panel* to provide focused scientific peer review for applicant consultant background studies (DEIR appendices) and the DEIR. I recommend that a scientific peer-nomination process, rather than arbitrary selection, be used to compose the panel, to cover all scientific and technical disciplines that are essential to analysis of potentially significant impacts of the project. The panel's functions should be coordinated by PRMD, and presumably financed by the applicant, but would remain at arm's length from the applicant to ensure independence. Models and precedents exist for this type of independent scientific review panel regionally and nationally.

The independent panel should *evaluate and critique the scope, methodology, data sampling area and duration, results, analysis, interpretation, and conclusions of applicant/agent consultant technical studies and the DEIR*. Experts in the panel should interact to inform each others' assumptions about independent variables that originate in different domains of scientific expertise. I recommend composition of a panel including highly qualified (expertise undisputed by peers) *academic and applied technical/scientific experts* to provide the quality control and peer review functions

PRMD intends for this DEIR. Experts would need to declare that they have no conflict of interest in the review of the project.

I emphasize the need for thorough scientific peer review of the baseline biological survey and assessment methodology, results, conclusions and recommendations. My preliminary review of these project background documents (on which the DEIR may rely) indicates *serious scientific defects and deficiencies* that are likely to result in inaccurate assessment of significant potential impacts, particularly with respect to sensitive plants (requiring multi-season targeted surveys) and targeted seasonally timed surveys for sensitive aquatic and amphibious wildlife species. This is particularly a concern for the geographic scope and sampling intensity of biological surveys in relation to all direct and indirect project impacts (roads, forest management, quarry, etc.), not just the vineyard “footprint” areas. Competent and vigilant review by a qualified independent scientific review panel would likely preclude overwhelming CEQA problems that stem from defective background environmental studies.

I consider an independent scientific peer review panel to oversee the DEIR to be the *single most important element of an adequate DEIR for Preservation Ranch.*

2.0. Specific concerns and recommendations for DEIR scope.

2.1. Range of alternatives, alternatives analysis. *The alternatives analysis is the single most important means of avoiding and minimizing significant project impacts that are inherent interactions of the project location and activities.* For moderate to small-scale CEQA projects that may be fully mitigated by enforceable, predictable, reliable mitigation measures at a proposed location, alternatives analyses may be less critically important. In this case, the massive project footprint and landscape-level transformation of the Wheatfield Fork Gualala River watershed fully justifies emphasis on *off-site* alternatives and *reduced project alternatives*, based on a reasonably broad definition of project purpose. Currently, there is no justification for the full build-out of the project throughout the ownership area.

The alternatives should include *multiple off-site locations and ownerships*, since the proposed project consists of multiple ownerships (multiple LLCs with intention to sell to different future owners), and parcels that are not essentially functionally related; their relationship depends, instead, on historic patterns of ownership. *The range of alternatives should consider economically feasible* (reasonable return on investment, investment security) acquisition or development of vineyards on *prior-converted croplands or orchards* in other parts of the county or state, to minimize the impacts of agricultural conversion. There should be no *a priori* or arbitrary attachment of project alternatives to particular regions or grape varieties.

The alternatives may include redevelopment of reasonable available vineyards (either for sale or likely to become available for sale at fair market prices), or provide fully adequate

explanation of why these are excluded from a reasonable range of alternatives, consistent with CEQA case law.

The alternatives analysis should not be a rationalization for the proposed project location or description. It should be a reasonable, far-sighted, creative and affirmative search for practical alternatives that meet essential project purposes and also reduce or avoid significant landscape-level project impacts caused by transforming a continuous undeveloped landscape into a mosaic of cropland-fragmented habitats.

2.2. Habitat fragmentation and wildlife movement. The impacts of the project configuration (pattern and scale) on movements of wildlife and establishment and stability of home ranges or territories, with emphasis on sensitive large mammal species, should be analyzed, and evaluated in a broad regional context.

2.3. Cumulative effects of agricultural conversion and operation on groundwater recharge, subsurface flows, groundwater quality, base flows, peak flows (and channel-forming/pool-maintaining peak flows), and water quality of streams currently or potentially supporting sensitive aquatic fish and wildlife species. This analysis should be conducted not as an average or general impact for the project as a whole, but for each tributary creek in which agricultural conversion occurs, with emphasis on sub-watersheds which support an extensive ridgetop matrix of vineyards. The analysis should consider impacts of future increases in reservoir capacity in response to long-term or extreme drought, or underestimation of irrigation needs. Irrigation needs should be rigorously analyzed, and all assumptions underlying analysis of irrigation demand should be carefully checked.

2.4. Forest management (THP or SYP) impacts should be included in all impact analyses. The project proposes forest management in non-vineyard areas. An SYP or THP should be included for analysis of biological and geomorphic impacts. To do otherwise would impermissibly segment (piecemeal) the project's impact analysis.

2.5 Vineyard netting impacts on wildlife: the impacts of vineyard bird mesh (placed over vines during fruit ripening) by the project proponents or their successors should be analyzed in terms of impacts to migratory birds, raptors, and owls.

2.4. Cumulative fire ignition risk associated with agricultural, forestry, residential, and road operations. Fire (wildfire) risk analysis should not focus narrowly on fuel load management of forests. Artificial sources of ignition associated with the project elements should be analyzed and modeled. Fire ignition risks should also be empirically estimated from comparable agricultural/forest interface settings in the Coast Ranges.

2.5. Construction-related impacts on wildlife and humans. Project impacts should not be analyzed only in terms of the built project's long-term operation. A reasonable range (not idealized) of construction periods should be analyzed in the DEIR for all potential

significant impacts related to construction, such as noise, light, dust, fuel spill, wildlife disturbance, erosion risk of temporarily unvegetated slopes, traffic congestion and accidents (due to equipment and commuting workers), pathogen dispersal risk, invasive species spread risk, etc.). I would recommend distinguishing construction-related and operational impacts throughout the DEIR.

2.6. Community-specific impacts of vineyard conversion impacts: The project differentially impacts ridgetop vegetation, including grassland and oak woodland/savannah resources. The species and communities affected by this selective topographic, soil, and vegetation impact should not be obscured by classifying them in broad community or vegetation classifications. In-kind mitigation (including avoidance and minimization) for ridgetop vegetation and habitats should be vigorously analyzed.

2.7. Carbon sequestration and balance: impact and mitigation analysis. The emergence of carbon sequestration markets (cap and trade systems) is followed by market-driven inflation of carbon sequestration claims and market-driven junk science lacking peer review. The net long-term carbon balance of the project should be analyzed fully (indirect and direct agricultural carbon emission, soil carbon balance, lost potential soil and forest biomass sequestration functions) with the best available scientific methodology and peer review.

2.8. Project failure impacts. Like the segregation of project construction and operational impacts, the risk of project failure (agricultural failure due to climate or economic change within foreseeable project life) and associated environmental impacts of derelict or incompletely constructed project sites should be evaluated for their own impacts. Omission of this risk was clearly a defect for EIRs on residential housing developments in the Delta (near Oakley, Contra Costa County) that recently failed economically, leaving tracts of incompletely constructed infrastructure and buildings – an environment that was not anticipated. This impact analysis is related to the need for an independent assessment of the business plan or model for the project. Indeed, many Annapolis vineyards are located in failed orchards or ranches of the 20th century.

2.9. Landslide and erosion risk impacts. Site-specific empirical studies of recent landslides, erosional gullies, in the project area and its vicinity should be incorporated in the analysis of erosion and landslide risk, considering road construction/rehabilitation, climate fluctuations and forest management activities.

2.10. Project-related increase in water demand and indirect impacts of subsequent wells or diversions. The DEIR should consider actions likely to be taken by future landowners if climate change results in reduced rainfall over time. Unless it is demonstrated to be legally and administratively feasible to enforce restrictions on well drilling and well use, the DEIR should consider all cumulative impacts of any increased well pumping, dams, upland impoundments, and stream diversions allowed by law (water rights) or likely to occur under foreseeable levels of detection and enforcement (if illegal), driven by

irrigation deficits. The DEIR should disclose the current state of illegal well, dams/reservoirs, and diversions in Sonoma County.

2.11. Growth-inducing impacts and their cumulative environmental consequences for natural resources. The DEIR should review the recent history of vineyard expansion in Annapolis to determine the extent to which further vineyard development may be catalyzed or facilitated by this project, regardless of current land use zoning (since the current project is proposing zoning change to allow vineyards where they are currently prohibited, setting precedent for this).

2.12. Cumulative project impacts – ongoing. Even since the NOP, a new timber harvest plan with proposed clear-cuts on the Wheatfield Fork has been on public notice, and another vineyard DEIR (Artesa-Fairfax) has been circulated. The cumulative effect of the project and reasonably foreseeable new timber and vineyard projects (not project-specific forecasts, but general distribution, abundance and rates of new cumulative projects) should be quantified and modeled for impact analysis in all pertinent resource impact headings.

2.13. Cumulative impacts on local streamflow and downstream river flow, and water quality. The Wheatfield Fork pools of the Gualala River remained mostly wetted and deep above bedrock controls at Clarks Crossing (Annapolis Rd bridge) in 2008, but ran dry for miles below the upstream bedrock-controlled reach, where deep gravel alluvium ran adjacent to the existing Annapolis vineyard corridor. This anomaly should be specifically investigated in the DEIR in terms of cumulative impacts of vineyards on river flows needed to maintain viable populations of listed salmonids, drinking water supplies, and competing industrial uses. Data sets from California watersheds with vineyard density comparable with the proposed project, in addition to existing and foreseeable additional vineyards in the Gualala River watershed, should be used to assess impacts on flows and water quality (including agricultural contaminants, pesticides, nutrients, and fine sediment).

2.14. Cumulative impacts on survival and recovery of federally listed and state-listed fish, wildlife and plant species. The impact analysis for listed species should not be limited to direct impacts on existing (deficient) “snapshots” of listed species populations, but should focus on cumulative impacts on long-term recovery, in view of cumulative threats and projects, and variable trends or fluctuations (including bottlenecks) in species recovery.

In addition to these impact concerns about the physical environmental impacts of the project, I recommend that PRMD give full consideration to socioeconomic impacts of this project on the local communities in Annapolis, Sea Ranch, and Gualala – including traffic and traffic congestion hazards (cumulative with logging industry and existing vineyards), tourist economy impacts, social services, schools, police, fire protection, road maintenance, crime, illegal drug manufacture or cultivation, and community cohesion.

Respectfully submitted,



Peter R. Baye, Ph.D.

Cc: Friends of the Gualala River
Alan Levine, Coast Action Group
Sierra Club, Redwood Chapter
Paul Carroll
Richard Grasseti, Grasseti Environmental Consulting
California Native Plant Society, Milo Baker Chapter
California Native Plant Society, Dorothy King Young Chapter
Audubon Madrone Chapter
Center for Biodiversity, Oakland
The Sea Ranch Association
Sonoma County Water Coalition
Interested Parties