

## a photo to share with Advisory Committee members, please - Paula Lane



Susan Kirks &lt;susankirks@sbcglobal.net&gt;

Mon 7/26, 9:23 PM

Misti Arias; Jacob Newell; Sheri Emerson; Kathleen Marsh; Jennifer Kuszmar; +1 more v

Reply all | v

Inbox

This item will expire in 2 days. To keep this item longer, apply a different label.

Label: Inbox (2 months) Expires: 9/24/2021 9:23 PM



v Show all 1 attachments (569 KB) Download

Report to Abuse

**EXTERNAL**

Hello Misti and everyone,

Could you forward this photograph to the Open Space AC members?

In the meeting last week, Biologist Kim Fitts was given 2 minutes for a comment. She was calling in by phone and did not have information about a 2 minute limit (unable to see the Zoom meeting screen). I believe she is preparing a supplemental statement for the committee, which will be forthcoming.

I would also like to submit a supplement for committee members.

For now, while the topic is fresh in committee members' experience, I offer 4 clarifying points, accompanying this photo and District staff's meeting presentation..

1. Attached photo reflects take of habitat and impacts. This roadway occupies almost the entire initially planned agriculture area, not a small portion. The roadway turns onto Sunset Drive and further extends inside the fence line. *The agriculture area in the initial Project design was removed when the Project design was revised in 2017, over 4 years ago.*

Note: In 2017, Kim Fitts and I met with you and Sara Press to explain 2 short trail segments for the Project. These 2 trail segments would connect other public access elements (3 viewing areas, two with benches, and amenities along the interior trail within the Building Envelope, and the perimeter trail inside the property boundary, outside the fence line - connected to a replaced perimeter fence with art-posts donated by community members for the wildlife friendly fence. The right of way issue with the City could be discussed and resolved. PG&E had cleared their power box location and their area, with no issues.. We clarified at that time, under no circumstances could access trails be installed inside the fence line, in habitat. The reason is the American Badger would be displaced from the property. We all expressed understanding.

Following our meeting, Kim Fitts' and my names were added to your consultants database for expertise and input for American Badger.. .

2. In the staff presentation, Jake's graphic depicted what appeared to be a large land area with this small "trail" taking up only a small part of the property. In fact, the attached photo reflects the large area taken, impacting habitat and removing prey base from an important area of hunting by badgers and raptors.

This area, unlike Jake's comment of not being used by wildlife, is accessed on an almost nightly basis with an abundance of prey in this area. Up to June 16, a juvenile badger was foraging almost nightly there. June-August is also dispersal season for juvenile badgers. Quiet, unencroached into habitat is imperative to allow natural development for hunting skills so young badgers can then disperse and seek their own territory. From June 16 to the present, over a month, there has been no access by badgers of this area. That is highly unusual and reflects what both Kim Fitts and I predicted. I monitor the entire area within which the Paula Lane property exists and so am familiar with badger foraging and burrowing uses and the reliance upon the open space property as the anchor property for the adult female badger in residence.

3. In 2017, when the Project design was revised and agriculture completely removed from the Paula Lane frontage, this was in response to 50% of contiguous habitat to the open space land being destroyed by property owners south of the open space. The need to ensure sufficient habitat for American Badger, especially considering the natal territory, was critically important. Any added agriculture was to be located within the Building Envelope. These changes were made, consistent with terms of the Conservation Easement and in anticipation of a balance of open public access in appropriately managed areas. Note: The Sunset View area, with custom designed redwood bench (partially visible in one of Jake's photos), has been available 24/7 to the public since 2016. It is a beloved visiting area for peace and respite. Not any longer. The roadway constructed in habitat along the Paula Lane frontage has also destroyed the Open Space Aesthetic, the #2 priority after Natural Resources for protection in the Conservation Easement.

Dept. of Fish and Wildlife biologist Stacy Martinelli has communicated to the District that any development on the property should be within the Building Envelope and the habitat should be left undisturbed.

4. Natural Resources = the #1 priority for protection under the Conservation Easement. The City of Petaluma does not have a right to violate terms of the Conservation Easement, In addition, the revised Project design, not the initial design from many years ago, is the relevant , ground-truthed design to correlate to terms of the Conservation Easement and compliance with Project implementation.

We appreciate the update that was agendized for the last Advisory Committee meeting. It was unfortunate that Don McEnhill wasn't able to attend, in view of his representation of the Environment. Members did recommend a meeting for discussion and resolution along with an assurance of monitoring badger activity. We would like to follow up on these two recommendations. One would require monitoring by experts who understand how to assess badger activity. The City's biologist does not possess those skills. The biologist's graphic used in your presentation to the committee meeting was out of date and inadequate for assessing the badgers' presence and use of the conserved land.

If Sheri or Kathleen could be in touch to schedule the requested site visit with staff, as requested, I will appreciate that.

Thanks very much, and thank you for being open to a best potential resolution for this overall situation.

Susan Kirks  
707-241-5548

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

COUNTY ADMINISTRATION  
CENTER  
575 ADMINISTRATION DRIVE,  
ROOM 105A  
SANTA ROSA, CALIFORNIA 95403

TELEPHONE: (707) 565-2421  
FACSIMILE: (707) 565-2624

ASSISTANT COUNTY COUNSEL  
DEBBIE F. LATHAM



**OFFICE OF THE COUNTY  
COUNSEL**  
**ROBERT H. PITTMAN**  
County Counsel

CHIEF DEPUTIES  
PHYLLIS C. GALLAGHER      ADAM L. BRAND  
JENNIFER C. KLEIN        JOSHUA A. MYERS  
CORY W. O'DONNELL

DEPUTIES  
LINDA SCHILTGEN      ALDO MERCADO  
TAMBRA CURTIS        TASHAWN SANDERS  
LISA PHEATT            ADAM RADTKE  
HOLLY RICKETT        SITA KUTEIRA  
VERNE BALL             JEREMY FONSECA  
IAN TRUEBLOOD        LUKE BOWMAN  
ELIZABETH COLEMAN    MATTHEW LILLIGREN  
PETRA BRUGGISSER    MAILE DUNLAP  
CHRISTA SHAW         MATTHEW CODY  
MICHAEL KING         KRISTIN HORRELL  
KARA ABELSON         IVAN JIMENEZ  
DIANA GOMEZ          SHARMALEE RAJAKUMARAN

August 10, 2021

Susan Kirks  
Paula Lane Action Network  
P.O. Box 2903  
Petaluma, CA 94953

Re: Paula Lane Conservation Easement Inquiry

Dear Ms. Kirks:

I represent the Ag + Open Space District and, and at the request of the General Manager, I'm writing to respond to your allegations that my client is allowing violations of the Paula Lane Conservation Easement. These claims ignore facts and circumstances that have been conveyed to you on multiple occasions and this letter will serve as Ag + Open Space's final response. We welcome your continued engagement on this project as an interested member of the public. However, Ag + Open Space is not going to revisit the City's well-settled project implementation decisions to date.

**1) Paula Lane Project History**

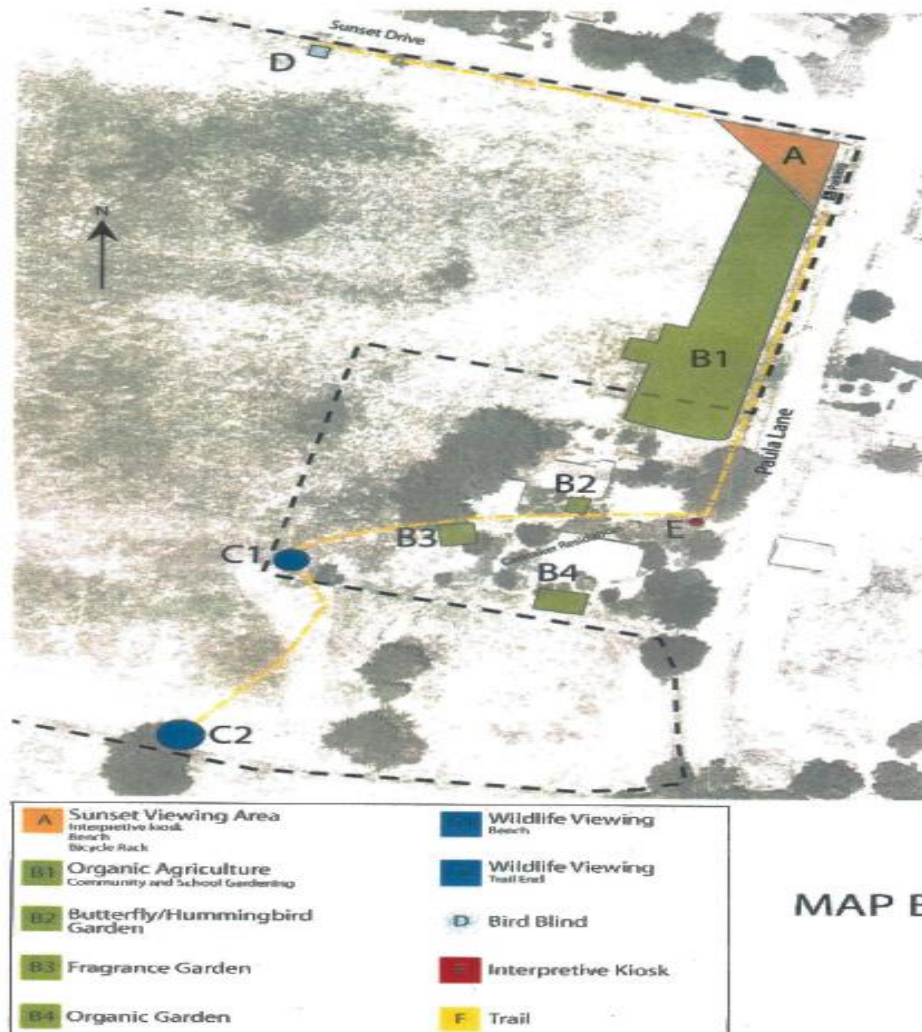
a) YEARS 2008 – 2012 (Application and Acceptance in Matching Grant Program)  
Ag + Open Space takes great pride in sponsoring conservation projects that have multiple public benefits, such as the Paula Lane Project. From the beginning, this project was designed to provide habitat preservation for wildlife *and* public access and public educational opportunities. As described in the original application from the Paula Lane Action Network ("PLAN") and the City of Petaluma in 2008, *the content of which served as a material inducement for the District's expenditure of over \$1Million in taxpayer funds to purchase the property*, the project was proposed to deliver "maintenance, restoration, access, and the implementation of programs that invite people of all ages and levels of physical ability to enjoy the beautiful [Paula Lane] property." (Executive Summary, ¶1.) "The project is a multifaceted open space project featuring passive recreation, public access, preservation of important wildlife habitat, organic agriculture and community gardens, outdoor education programs, and on-site caretaker presence." Notably, the application acknowledged existing recreational uses of the property and

promised access to the property as a virtue of the project, stating “The property perimeter and Paula Lane area are frequently visited for outdoor exercise, wildlife appreciation, and needed respite from urban life. The property will provide scenic bicycling access and a rest stop for cyclists to and from Helen Putnam Regional Park, Bodega Highway and multi-directional cycling routes. The property will enhance pedestrian access from Petaluma’s west side, an underserved area in parks and open space acreage. The Preserve links popular walking routes from Oak Hill Park and is within walking distance of downtown Petaluma. Pedestrian access will be facilitated by a nearby public transit stop.” (Executive Summary, ¶3.) The application went on to promise delivery of public access, including development of trails and community gardens, within 3 years. “A three-year implementation plan has been developed which includes the development of trails, community gardens, organic agriculture, and wildlife habitat protection.” ((Executive Summary, ¶4.)

In reliance on these public benefit promises, the Ag + Open Space Board of Directors approved a Matching Grant Agreement with PLAN and the City (“MGA”) dated April 10, 2012, whereby the parties agreed to “...provide public access, habitat preservation, agriculture, and educational programs” on the property, described to include installation of a short trail; installation of viewing areas and benches; restoration of habitat; agricultural use; demonstration gardens, and related public access.” As highlighted by staff at the July 2021 Advisory Committee Meeting, *the conservation easement that was approved by the Board in connection with the grant was specifically designed to allow for uses of the property consistent with the purposes of the grant.* Those easement allowances and the purposes of the grant have not changed.

b) YEARS 2012 – 2013 (Development and Approval of Work Plan and Management Plan)

The specific contours of the deliverables to be accomplished in furtherance of the matching grant were later documented in the Work Plan approved by District staff in 2013. The 2013 Work Plan provided for construction of a perimeter trail and a trail into the Preserve, to the hilltop, as well as a community garden in the agricultural area, as shown by the conceptual map provided as part of the Plan:



The 2013 Work Plan was a component of the 2013 Management Plan for the property, prepared pursuant to the Conservation Easement. Ag + Open Space approved the Management Plan in January of 2013, highlighting that Paragraph 5.1.7 of the conservation easement provides as follows:

“Once the Management Plan is approved by DISTRICT, uses and improvements described in that approved Management Plan, **and all development necessary to implement those described uses and improvements, shall be deemed to be consistent with the Conservation Purpose of this Easement and shall be permitted on the Property without further notice to or approval by DISTRICT required.** All such uses and improvements shall be undertaken in accordance with the terms and conditions of this Easement and in compliance with all applicable laws and regulations.”

The approved Management Plan provides for the following public access features:

“Five project elements will satisfy a holistic approach to offer public access to the Nature Preserve. These include:

- Wildlife viewing area with an artfully designed bench.
- Wildlife viewing and vista area on hilltop.
- A sunset viewing area with a bench, to enjoy beautiful sunsets.
- A covered bicycle rack inside the Preserve entrance.
- A perimeter trail and a trail into the Preserve, to the hilltop.”

Thus, based on information available at the time, including biological surveys performed by Ms. Fitts in support of the project as described, the District found the project to be consistent with the conservation easement and, pursuant to the matching grant agreement, PLAN and the City of Petaluma were obligated to work diligently to deliver the project as described in 2013.

c) YEARS 2013-2018 (Delayed Implementation & Approval of Certain Work Plan Modifications)

Notwithstanding the approvals given in 2013, progress to complete various components of the project were significantly delayed. By letter dated November 15, 2016, PLAN and the City requested an time-extension for implementation of the 2013 Work Plan, as well as a modification to the Work Plan itself. This attempt to renegotiate the terms of the District’s grant has since been defended on grounds that “[s]ignificant habitat destruction on the property south of the open space land occurred in 2012-13. The negative impacts to area wildlife, including American Badger, were significant. This made habitat availability and protection for American Badger on the open space land more significant because of changed circumstances.” Though there is certainly an interconnectedness between the habitats protected with public dollars and those that are not protected, the District does not have the power to modify conservation easements (or grant documents) simply because third party actions on private property may have impacts on conserved land. And, to be clear and as further discussed below, protection of habitat for badgers, while important, is not the exclusive purpose of the conservation easement or the grant. Ag + Open Space cannot and will not surrender the other public benefits of this project.

Accordingly, by letter dated April 6, 2017, Mr. Bill Keene rejected proposed changes to the trail plan, noting that such proposals “reduced opportunities for the public to interact with the property.” Mr. Keene’s letter emphasized that public access to the property, without need for formal orientation of a guide beyond what is available at the kiosk or other signs, must be achieved by December 6, 2018.

**Before moving on, we must address very specific misrepresentations you have made about the changes to the Work Plan approved in 2017.** Ms. Kirks, by email dated July 26, 2021, you asked that staff send correspondence to members of the Advisory Committee that falsely states that staff approved changes to the Work Plan in 2017 to remove the agricultural area. This is a boldly inaccurate statement, as the letter clearly states: “**Agricultural Area.** The proposed



reduction in size is not approved.” Please see the attached letter from Mr. Keene, which conditionally approved only the following changes to the 2013 Work Plan:

<b>Project Element</b>	<b>Proposed Change</b>	<b>Response</b>
Sunset View Area	Different location	Approved along Paula Lane rather than at the intersection of Paula Lane and Sunset Drive
Fragrance Garden	Removed	Approved
Organic Garden	Removed	Approved
Interpretive Kiosk	Different location	Approved within the Building Envelope as long as a Preserve Sign is located visible from Paula Lane
Main Preserve Sign	Different location and different timing	Approved along Paula Lane with installation by September 1, 2017
Bicycle Rack	Different location	Approved further inside the Building Envelope
Perimeter Parking	Removed	Approved
Bird Blind	Removed	Approved

By email dated June 25, 2021 to Mr. Don McEnhill and Ms. Misti Arias, you characterize the approved changes to the Work Plan in 2017 as being designed to “protect the #1 priority conservation value, badgers.” But, as clearly documented in the attached letter from Mr. Keene, this is also clearly not true. Though approved changes may have been requested by PLAN in order to avoid possible impacts to badger habitat, the District’s approval of those changes was not a recognition that badger habitat is the “#1 priority conservation value,” nor was it a concession that the original 2013 Work Plan failed to comply with the conservation easement.

d) Years 2019-Current (City of Petaluma Assumes Lead Role and Makes Diligent Effort to Complete Project as Proposed)

By August of 2019, although PLAN and the City had installed a bench, a welcome sign, a visitor kiosk, and part of an interior walking trail, the perimeter trail remained stalled by PLAN’s insistence that it be located outside the boundary fence of the property. As described by the City in its letter dated August 21, 2019, the only option PLAN would support required placement of the trail in a County road right-of-way. Per the City, “[s]uch an ill-advised plan would create a danger to both pedestrians and motorists and would not result in the public accessing and using the property as intended.” The City’s August 21, 2019 letter also describes the City’s reasons for terminating its relationship with PLAN and the District respects the City’s authority, as the landowner and a responsible party under the grant, to decide with whom they will partner to advance the public interests at stake.

On October 17, 2019, Mr. Keene approved the City’s modified Work Plan. This 2019 Work Plan contemplates construction of interior and perimeter trails, with the exact placement to be dependent on the results of a biological assessment. This assessment was “[to ensure the optimal balance of natural resource preservation, open space resources, recreation and education, and agriculture on the Preserve.” “The results of the biological assessment will dictate the location

of site activities and improvements and may be useful for CEQA compliance should any physical changes be needed to the Preserve.”

Following completion of this biological assessment by WRA in the spring of 2020, the City approved the location of the trails and filed a notice of exemption (NOE) on January 19, 2021. The NOE described the trail project as follows:

*The project consists of installing a portion of the planned improvements at the existing Paula Lane Open Space Preserve including a public access trail extending from the existing building onsite along Paula Lane towards Sunset Drive. The project involves the construction of approximately 600 square feet (sf) of 7 inch thick reinforced concrete driveway and ADA parking area markings and signage at the existing gravel driveway, as well as 80 sf of 4 inch thick reinforced concrete walkway, 900 sf of compacted C12AB, and 1,670 sf of stabilized quarry fines to establish onsite trails for public access and use. All improvements will occur in the eastern portion of the site at and near the developed area (413 Paula Lane) and the existing public streets (Paula Lane and Sunset Drive).*

This is a City project that received approval from the District for purposes of grant compliance in 2019. Notwithstanding these facts, and in lieu of a more timely engagement with City staff on the design and approval of its project in January of 2020, PLAN now asks Ag + Open Space to revoke previous approvals and demand that the City forfeit the considerable investment of city taxpayer funds spent on these improvements on grounds that the project is prohibited by the conservation easement. Ag + Open Space staff strongly disagree with PLAN’s interpretation of the easement, and will not be revisiting prior project approvals.

## **2) Alleged Violations of Conservation Easement**

As described by Ms. Jennifer Kuszmar in an email to you on June 22, 2021, the construction of the ADA trail on the property is consistent with the terms of the conservation easement, which allows trails and related public amenities to be constructed within the Agricultural Area and Building Envelope *without notice to or approval by the District.*

Of course, the mere fact that the conservation easement allows the City’s project does not mean that the impacts will not be monitored by Ag + Open Space staff. The City and Ag + Open Space staff fully intend to examine how these permitted recreational uses of the property will impact the habitat values and corrective action to minimize impacts will be taken if needed.

However, please understand that the conservation easement does not require that there be no impacts to natural resources on the property. If that were the case, the conservation easement would have but one conservation value, and there would be no need for designated envelopes within which specified activities are permitted or prohibited. That is, the designated envelopes in the conservation easement, and the uses specifically allowed or disallowed therein, exist to acknowledge that certain allowed uses of the property are inherently at odds with the absolute

preservation of natural resources. As you know, the conservation easement defines “the Conservation Values” to include natural resources, *and* open space, *and* recreation *and* education, *and* agriculture. (§2, Emphasis added.)

Clearly, there is a careful balance to be struck in harmonizing the various Conservation Values contemplated by the Paula Lane conservation easement. That balance is expressed most fundamentally in the structure of the easement, which allows for more intensive uses of the property in the more developed (eastern) areas, and less intensive uses of the more sensitive (western) portions of the property. With this structure in place, the relative priority of the Conservation Values is not at issue under most circumstances. That is, the preservation of the natural resource values takes precedence over other conservation values, such as recreation and education, *only in the event of an irreconcilable conflict*, which the easement is designed to avoid:

“GRANTOR and DISTRICT intend that *all* Conservation Values of the Property will be fully preserved and protected in perpetuity. In the event, however, that the preservation and protection of one Conservation Value becomes *irreconcilably inconsistent* with the preservation and protection of another Conservation Value, the following priorities shall be followed: preservation and protection of natural resources shall take precedence over preservation and protection of open space resources, which shall take precedence over recreation and educational uses, which shall take precedence over agricultural uses.” (§3, Emphasis added.)

The facts available do not suggest the existence of *irreconcilable* conflict as between the recreation values and the natural resource values in the Agricultural Area, or otherwise. The studies conducted have consistently shown that badger dens and activity are more concentrated west of the Agricultural Area, which is adjacent to residential development and the Paula Lane roadway. As such, the allowances for development in the Agricultural Area acknowledge the relative habitat value of that area with the express purpose of ensuring that all Conservation Values can co-exist. The conservation easement cannot be read to prohibit otherwise allowable recreational development and uses of the property simply because those uses may have some kind of impact. As a legal matter, such a construction of the conservation easement fails, as it would render much of the easement language describing permitted (and potentially resource-impacting) activities moot. (*See* Civil Code section 1641, “The whole of a contract is to be taken together, so as to give effect to every part, if reasonably practicable, each clause helping to interpret the other.”)

Our collective deference to and respect for the original design and structure of the conservation easement is hardly a sign of neglect. As stated above, Ag + Open Space staff will continue to monitor impacts associated with various uses of the property and, if needed, measures will be



Ms. Kirks  
August 10, 2021  
Page 8

implemented to ensure protection of the more sensitive portions of the property outside of the Agricultural Area.

If you have any information to provide that has not already been provided to District staff, please feel free to contact Ms. Sheri Emerson. Ms. Emerson is also willing to attend a site visit with you and City staff, with the City's consent, which we ask that you obtain independently.

Please understand that the District has read your emails and has heard your concerns about the Paula Lane property and no additional response will be forthcoming as to any previous communications or allegations. As always, the District will continue its regular stewardship functions at the Paula Lane Property in an independent fashion and consistent with the public trust.

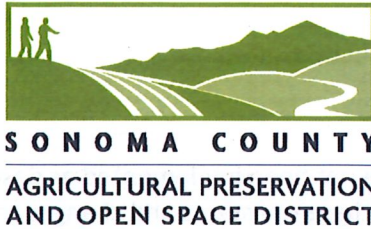
Kind regards,

*Lisa Pheatt*

Lisa Pheatt  
Deputy County Counsel

Enclosure

c: Misti Arias, Ag + Open Space General Manager  
Sheri Emerson, Ag + Open Space Stewardship Program Manager



April 6, 2017

Jordan Green  
 City of Petaluma  
 11 English Street  
 Petaluma, CA 94952

Susan Kirks  
 Paula Lane Action Network  
 PO Box 2903  
 Petaluma, CA 94953

**Re: Response to Request for Work Plan Amendment for the Paula Lane Open Space Preserve**

Dear Ms. Green and Ms. Kirks:

Thank you for your letter dated November 15, 2016 requesting to amend the Work Plan for implementation of the Paula Lane Open Space Preserve project, as allowed in Paragraph 5.a of the executed Matching Grant Agreement (Agreement). Per the Agreement, the project to be implemented “will provide public access, habitat preservation, agriculture, and educational programs” (Recital C).

Since the property was acquired in May 2012, the City of Petaluma (City) and the Paula Lane Action Network (PLAN) have completed a number of elements of the proposed project. This was documented in the amendment request letter and confirmed by a site visit on December 7, 2016. At the same time, we understand that the City and PLAN have become more familiar with the property since acquisition and have faced unforeseen conditions that provide the impetus to request changes to the approved Preserve Management Plan’s Work Plan.

Changes to the following project elements are approved as described below conditioned on the City and PLAN addressing the list of outstanding items that follow.

<b>Project Element</b>	<b>Proposed Change</b>	<b>Response</b>
Sunset View Area	Different location	Approved along Paula Lane rather than at the intersection of Paula Lane and Sunset Drive
Fragrance Garden	Removed	Approved
Organic Garden	Removed	Approved
Interpretive Kiosk	Different location	Approved within the Building Envelope as long as a Preserve Sign is located visible from Paula Lane
Main Preserve Sign	Different location and different timing	Approved along Paula Lane with installation by September 1, 2017
Bicycle Rack	Different location	Approved further inside the Building Envelope
Perimeter Parking	Removed	Approved
Bird Blind	Removed	Approved

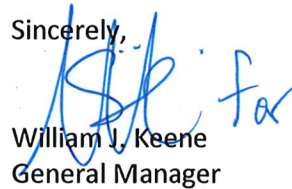
There are additional items that have not been implemented as described in the originally-approved Work Plan. We are concerned that these omissions and changes result in reduced opportunities for the public to interact with the property. The project accepted into the Matching Grant Program anticipated that volunteers, local school groups and the general public would be able to come onto the property, care for and learn about the habitat and the garden components. To this end, the following project elements need to be implemented during the extension period.

- **Agricultural Area.** The proposed reduction in size is not approved. The project application proposed a ¼- to ½-acre area for sustainable agriculture and a community garden. The amended size of the area being proposed for agriculture is 1,480 square feet (while ¼-acre is 10,890 sf). We understand that PLAN believes that the area proposed for agriculture is sensitive habitat for badgers. However, there may be alternative locations where agriculture would be appropriate. Please propose use of at least ¼-acre of the property for agriculture, community garden, or other feature that provides a similar benefit to the community. If we do not receive such a proposal, we will arrange to bring a third-party qualified biologist to the property to provide an assessment of where additional agriculture could be located, if at all, so as to not impact sensitive badger habitat.
- **Perimeter Trail.** In order to enhance the experience for the public, we would like the perimeter trail to be located on the inside of the perimeter fence. We understand that this might involve moving the fence closer to the road, but we also understand that replacing the fence might already be anticipated.
- **Interior Trail.** In order to enhance the experience for the public, we would like you to explore options for moving the interior trail to the outside of the residences, while still remaining within the building envelope. One suggestion is for the trail to extend from the agricultural area, since there will already be a trail through that area, and follow the edge of the building envelope up to Wildlife Viewing Area #1, at which point it would follow the currently planned interior trail. We are available to talk with your trail consultant about such options.
- **Educational Program.** The project application proposed partnerships with multiple local schools, including strong support from Petaluma Junior High School. We would like to see the incorporation of school classes into the caretaking of both the habitat restoration and agricultural components during the grant extension period. Please include information in your quarterly progress reports on how this component is being developed and when such participation will begin.
- **Public Access.** The originally-approved Work Plan committed to providing a specific number of guided walks each year: 8 in Y1, 15 in Y2, 15 in Y4, and 12 in Y5. Per the reporting in submitted Progress Reports, 10 of those 50 walks have been completed. The Work Plan amendment proposal includes 6 guided walks in Y6. We would like to see fulfillment of the original intention (40 more guided walks needed) plus an additional 8 provided in each Y6 and Y7. We would also like documentation of the outreach done for these walks – both those that have occurred and those still to happen. For guided walks in Y6 and Y7, please provide us with participant sign-in sheets. If you have sign-in sheets for the walks conducted in Y1 and Y2, please provide us with a copy.

As stated in the District's extension approval letter dated December 8, 2016, public access must be in place by December 6, 2018. This requires that the property be open to the general public the majority of daylight hours, without need for a formal orientation or a guide beyond what is available on the kiosk or other signs. Such access must include, at a minimum, access to the Wildlife Viewing Areas via the interior trail and the perimeter trail.

Thank you for your continued work on this project and for your ongoing mission to provide the residents of Sonoma County with a variety of places to learn about the environment and opportunities to get outside. If you have any questions, please contact Sara Press at 565-7368 (sara.press@sonoma-county.org).

Sincerely,



William J. Keene  
General Manager

C: Misti Arias, Acquisition Program Manager  
Sara Press, Land Acquisition Associate  
Jennifer Kuszmar, Matching Grant Coordinator