

Ramirez, Angelica

Public Comment

#4

From: Ana Citrin <Ana@lomcsb.com>
Sent: Friday, May 13, 2022 11:31 AM
To: sbcob
Cc: Plowman, Lisa; Schmuckal, Christopher; Linda Krop; Rachel Kondor; Marc Chytilo; Brian Trautwein
Subject: Appellant comment letter - Item # D4, May 17, 2022 - Santa Barbara Ranch Inland Development Agreement Appeal
Attachments: IDA Appeal Letter to Board_FINAL_5-13-22_w Attachments A-D.pdf



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Dear Clerk,

Attached please find a letter for distribution to the Supervisors submitted jointly by this office and EDC on behalf of Appellants in the above referenced matter.

Best regards,

Ana Citrin
 Law Office of Marc Chytilo, APC
 P.O. Box 92233
 Santa Barbara, CA 93190
 Phone: (805) 570-4190
 Fax: (805) 682-2379

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LAW OFFICE OF MARC CHYTILO, APC

ENVIRONMENTAL LAW

May 13, 2022

Joan Hartmann, Chair
Santa Barbara County Board of Supervisors
105 E. Anapamu Street
Santa Barbara, CA 93101
By email to sbcob@co.santa-barbara.ca.us

Re: Case No. 21APL-00000-00017 re Santa Barbara Ranch Inland Development Agreement Appeal, Item # D4, May 17, 2022

Dear Chair Hartmann and Supervisors:

We write to you today regarding the upcoming hearing on our appeal of the Planning and Development Director's Periodic Review Determination for 2020-2021 pursuant to the Inland Development Agreement for Santa Barbara Ranch ("IDA"), dated March 30, 2021. Collectively, we represent the Environmental Defense Center, the Surfrider Foundation by and through the Santa Barbara Chapter, and the Gaviota Coast Conservancy in this matter. Our appeal was continued from a December 14, 2021 hearing to May 17, 2022.

At the December 14, 2021 hearing, the Board heard arguments made by Appellants and by the Santa Barbara Ranch Developer (SBRHC, represented by Standard Portfolios, LLC), heard from interested members of the public, and voted to:

Continue the project and direct staff to come back with findings that the Developer is not in good faith compliance with the IDA based on the Developer's failure to offer all reasonable assistance for implementation of the alternative creek restoration project as required by Section 2.02a of the IDA; and,

Direct staff to write a Default Notice letter pursuant to Section 10.01 of the IDA.

(Board Action Letter, 12/17/21).

Meanwhile, on February 8, 2022 the Developer requested that the County conduct its annual Periodic Review of the Developer's good faith compliance with the IDA for the 2021-

906 Garden St. Santa Barbara, CA 93101
PHONE (805) 963-1622 FAX (805) 962-3152
www.EnvironmentalDefenseCenter.org

2022 compliance period. (Lamport Periodic Review Request, 2/8/22). In response, Director Plowman issued a determination of non-compliance for the 2021-2022 review period, stating:

Because the April 8, 2021 deadline for the completion of the alternative creek restoration project has passed without any project being identified, and because the Developer has not provided all reasonable assistance and taken all reasonable steps to ensure performance of the alternative creek restoration work under the terms of its Funding Agreement with the Developer's chosen non-profit organization, as well as under the terms of the IDA, the County finds that the Developer is not in good faith compliance with the Santa Barbara Ranch Inland Development Agreement for the 2021-2022 Periodic Review cycle.

(Director's Periodic Review Determination of Non-compliance (2021-2022), 4/7/2022.) The County also issued a Default Notice Letter dated April 7, 2022, stating that the Developer:

has failed to provide all reasonable assistance and take all reasonable steps to ensure performance of the alternative creek restoration work under the terms of its Funding Agreement with the Developer's chosen non-profit organization (California Association of Resource Conservation Districts, or "CARCD"), and under Section 2.02(a) of the IDA.

(Default Notice Letter, 4/7/22.) The Developer subsequently filed an appeal, and that appeal will be heard by the Board in the near future.

In the Board Letter for this hearing, staff deviated from the Board's clear direction on December 14, 2021. Staff has not presented findings that the Developer is not in good faith compliance with the IDA based on the Developer's failure to offer all reasonable assistance for implementation of the alternative creek restoration project as required by Section 2.02a of the IDA, and did not write a Default Notice letter pursuant to Section 10.01 of the IDA for the 2020-2021 review period as directed. Rather, staff recommends that the Board deny the appeal, and make findings to affirm the Director's determination that the Developer *was* in good faith compliance. (Board Letter for 5/17/22, p. 1.) The primary rationale staff offers for this change is that "Staff believes that the record for the 2021-2022 Periodic Review provides stronger support for finding that the Santa Barbara Developer is not in good-faith compliance with the Agreement, consistent with the Board's direction at the December 14th hearing." (*Id.*, p. 2.)

While we don't disagree that the expiration of the April 8, 2021 deadline during the 2021-2022 periodic review cycle provides strong evidence for the Developer's non-compliance, the record clearly supports a finding of non-compliance for the 2020-2021 review period as well. Appellants submit that were the Board to find, as staff now recommends, that the Developer *was* in good faith compliance for the 2020-2021 period, the Developer would only use that decision as fodder to bolster its challenge to the 2021-2022 non-compliance determination. **We respectfully request that the Board a) affirm its direction to staff to prepare findings and a Default Notice Letter for the 2020-2021 review period consistent with the Board's direction on December 14, 2021; and b) continue the hearing to a future date to consolidate the matter with the Developer's appeal of the 2021-2022 non-compliance determination.**

I. Developer Non-Compliance Is Established for Both the 2020-2021 and 2021-2022 Review Cycles.

Leading up to and during the December 14, 2021 hearing, the Board reviewed the record, including written submittals and testimony from Appellants and the Developer, and concluded that findings of non-compliance were warranted. Nothing has changed that would affect that conclusion, as the 2020-2021 review period on which the compliance determination is based has long passed. Although the deadline for completion of an alternative creek restoration project had not run at the time of the Director's determination for the 2020-2021 review period, there is ample evidence that the Developer had not offered reasonable assistance towards support of a restoration project at an alternative site on the Gaviota Coast during that time period, as required by the IDA.

As explained in the proposed Findings Supporting a Determination of Compliance with the Santa Barbara Ranch IDA (Board Letter Attachment 1), the only evidence the Developer provided in its Compliance Letter to the County for the 2020-2021 Periodic Review period (dated January 29, 2021), are the Developer representations to the County that:

- 1) "the Developer assisted CARCD to formalize a request for the County's consent" as to an alternative creek restoration project; and 2) "the Developer has periodically responded to requests for more information from the County."

(Proposed Compliance Findings, p. 2) The Findings further provide:

To date, the County has not received a formal request for the County's consent for completion of an alternative creek restoration project." Nonetheless, the Findings provide "[h]owever, in reliance upon Developer's representations that the Developer continues to assist CARCD to identify and complete an alternative creek restoration project, the County finds that the Developer is in good-faith compliance with the IDA. This conclusion is plainly not supported by substantial evidence and is at direct odds with the Board's direction on December 14, 2021.

(Id.) Although the staff's recommended findings rightly note that "the deadline for completion of the alternative creek restoration (April 8, 2021) will expire during the 2020-2021 Periodic Review cycle," in fact it expired only *9 days* after Director Plowman issued her Determination on March 30, 2021. Accordingly, the overwhelming majority of any assistance the Developer provided to CARCD to identify and complete an alternative creek restoration project by the April 8, 2021 deadline necessarily occurred during the 2020-2021 review period or earlier.

While the Developer blames "stakeholder opposition" for its failures (addressed in the following section), this claim is pure hyperbole and County staff notified the Developer that the alternative projects identified were not acceptable on July 6, 2020 (see section II.B below). The Developer provided no evidence that it sought to address County staff's concerns, or that it offered to provide additional funding or other assistance that would enable CARCD to gain County consent for a viable and bona fide creek restoration project. The Developer's failure to

provide the reasonable assistance required to ensure the timely implementation of an alternative creek restoration project is clearly established based on the record for the 2020-2021 review period and the Board's findings should reflect that.

II. Stakeholder Opposition Did Not Cause to Creek Restoration to Fail.

The Developer attempts to defend its failure to reasonably assist with efforts for a restoration project at an alternative site on the Gaviota Coast by blaming Appellants, while arguing at the same time that it is under no obligation to offer reasonable assistance to accomplish creek restoration at an alternative site under the IDA. In fact, County staff itself raised serious concerns about the viability of proposed restoration projects and the use of restoration funding for administrative costs in emails we obtained under the Public Records Act (see below). Furthermore, there is no evidence in the record that the Developer or its contractor made a concerted attempt to address those County staff concerns. In addition, the Developer claims that "stakeholder" (i.e., Appellant) opposition derailed two projects, one on an unknown County park property and another on The Nature Conservancy's ("TNC") Dangermond Preserve, however, Appellants have no knowledge of any restoration proposal on County park property, nor have they communicated opposition to restoration on County property, either to the County Parks and Recreation Department or the Planning and Development Department. As to the communication with landowners, Appellant representatives did have a conversation with TNC staff regarding the suggested project but did not ask TNC to refuse to participate. In no way did Appellants preclude that landowner or any others along the Gaviota Coast from participating in creek restoration on their properties.

A. Developer Improperly Places Blame for Failure to Complete Creek Restoration on Appellants.

At the December 14, 2021 hearing on our appeal, the Developer's representative Stanley Lamport argued that stakeholder opposition to a creek restoration project resulted in the derailing of a successful project by the Developer's contracted non-profit, South Coast Habitat Restoration:

The restoration team has been trying to find an alternative site on the Gaviota Coast for the last year and had two viable alternative sites and in both instances those viable alternative sites ended up not going forward because of stakeholder opposition, one was through the County, one was through another entity. They were identified, they were viable, the funds could be used for that purpose and stakeholder opposition was the reason they didn't go forward. Stanley Lamport, Standard Portfolios, Ltd., Hearing Before Santa Barbara County Board of Supervisors on Appeal Case No. 21APL-00000-00017 (December 14, 2021).

Likewise, in an appeal of the Planning and Development Director's Periodic Review in which she found the Developer in non-compliance for 2021-2022, the Developer reasserted its contention that stakeholder opposition resulted in obstruction of completion of a restoration project on the Gaviota Coast. The appeal states:

SBRHC has been informed by multiple sources, including the County, that CARCD has not been able to move forward on a restoration because of landowner refusal to consent as a result of “stakeholder opposition.” We were informed that over the past two years significant progress was made on moving forward on a restoration at two sites, including at a County park site and that both restoration projects fell through because intervention by the parties affiliated with the current appeal of the 2020-2021 compliance determination caused the owner and the County park agency to withdraw consent.

The Director’s assertion that the Developer has not accounted for any effort to address “alleged opposition” belies the fact that the opposition has nothing to do with a particular restoration site. It is no secret that the project opponents are seeking to have the County terminate the IDA to cause the Inland Project entitlements to expire. At the public hearing before the Board of Supervisors on December 14, 2021, SBRHC asked the project opponents, which includes the Gaviota Coast Conservancy, to work with the Developer and CARCD to identify a restoration project on the Gaviota Coast, which the opponents refused to do. That was the second such request SBRHC made over the last year and the second refusal on the part of the project opponents, whose only proposal has been for Santa Barbara Ranch to be sold as open space.

(Santa Barbara Ranch – Inland Development Agreement Appeal of 2021-2022 Compliance Determination & Notice of Default at 4 (April 18, 2022).)

In contrast to the Developer’s innuendo, the Appellants have not obstructed the habitat restoration project, and indeed, it is for other reasons that projects have not moved forward, namely, County staff has raised doubts as to the viability of proposals put before them and the Developer has not offered reasonable assistance to its contractor in finding a suitable location. Adding to that, the \$300,000 in funds have been reduced to less than 1/10 of that figure, making any restoration project *de minimus* and not meaningful from the public’s standpoint.

B. County Staff Raised Concerns about the Viability of Creek Restoration Proposals.

In communications among County staff, and between staff and the Developer’s non-profit contracted to perform creek restoration, County staff raised significant concerns about the viability of restoration proposals. For example, on July 6, 2020, staff member Nicole Lieu in an email to Alex Tuttle stated that:

Please see the attached [Dangermond Preserve Proposal] from Moe [representing South Coast Habitat Restoration]. I think *they need to include actual restoration of habitat as some part of the proposal*. Also, it seems odd to me to allocate restoration funds to fund them writing grants for more funds. I would probably

ask them to remove that line item. The alternative water source item seems really vague...”¹ (Emphasis added.)

The same day, Ms. Lieu, communicating to Mauricio Gonzalez of South Coast Habitat Restoration, stated, referring to the proposed project on Dangermond Preserve:

... “Some funds should be allocated toward actual biological restoration/enhancement... The alternative water source is a separate project that TNC is undertaking to resolve a longstanding violation created by the prior owner *so it doesn't seem appropriate to allocate funds towards that project*. This item should be removed. The funds are primarily intended to support restoration work and not to fund grant writing to get more funds. Funds for this line item should be *eliminated or drastically reduced*. If funds are allocated here then there needs to be detail about what it is for and what it will accomplish.”² (Emphases added.)

With this communication, County staff rejected much of this proposal as not fulfilling the requirements for creek restoration in the IDA. In addition, later in July, Ms. Lieu communicated to other County staff that the restoration proposal before the County for consideration was “unacceptable”:

The status of this is that the Developer was unable to obtain approval from the required property owners (and to meet other obligations defined in the IDA) to implement the Dos Pueblos Creek restoration plan and so they now need to seek County approval for alternative restoration plan. We have been working with Moe Gomez of South Coast Habitat Restoration on finding an acceptable alternative project(s). *However, to date, none of the proposals have been acceptable in our view*. Last week, Brian Trautwein asked to meet with Alex and I to discuss a number of items. During that call we briefed him on the status of the SB Ranch restoration. We identified that Moe Gomez had sent us a request for alternative projects that we had not approved. Brian asked to see that request and we provided it to him. The letter sent today criticizes the proposal sent by Moe Gomez, so I am not sure if Brian communicated to Linda Krop and Marc Chytilo that the *proposal is not something approved by P&D and that we had in fact already found it unacceptable*.

(Email from Nicole Lieu to a list of County staff members (July 29, 2020).³ (Emphases added.))

In addition, we know from communications between County staff as well as the from the Director of Planning and Development that total funding allocated to creek restoration at the time the deadline for completion of a project was then less than 1/10 of

¹ SBR Emails #10; see Attachment A.

² SBR Emails #257; see Attachment B.

³ Tuttle Emails #14; see Attachment C.

the original amount allocated for that purpose.⁴ The lack of adequate funding is likely the real reason for the failure to secure a location, as approximately \$30,000 is inadequate by any standard for meaningful landscape or creek restoration.

C. Appellants Have No Knowledge of Restoration Proposal on County Property.

The Developer indicated in the Board's December 14, 2021 hearing and in its appeal of the Director's determination of non-compliance for 2021-2022 that "stakeholder opposition" had scuttled a project on County park property. Appellants dispute these statements. We have no knowledge of any proposed project on County park property, nor have we communicated with either Parks and Recreation Department or Planning Department staff regarding the same.

D. Appellants Do Not Have a Legal Obligation to Present the Developer with a Viable Creek Restoration Project – the Developer Must Fulfill Its Obligations under the IDA.

The Developer and its non-profit contractor have now had *seven years* to complete a project, either on Dos Pueblos Creek or any other property along the Gaviota Coast, and they have failed to do so. The Developer now attempts to obfuscate the issue by disclaiming any responsibility for this failure, stating it has no responsibility under the IDA to offer any reasonable assistance under the IDA and placing specious blame on Appellants for allegedly obstructing projects. In fact, the County had already deemed the restoration proposals presented to staff as *unacceptable*. The failure of the contracted non-profit to present a viable proposal does not release the Developer of its obligation to ensure a completed restoration project takes place. After all, in exchange for a minimal investment, the Developer received their requested approvals for development projects dated to 2008, which pre-dates the Gaviota Coast Plan, and extended such approvals for an additional 20 years, an extremely valuable benefit. Moreover, the Developer's disclaimer regarding the obligation to offer reasonable assistance shows a lack of good faith in its contractual relationship with the County.

III. The County Should Require Meaningful Restoration with Periodic Check-ins with the Board to Ensure Compliance with IDA.

We ask the Board to continue to uphold our appeal and find the Developer in non-compliance with the IDA for 2020-2021, in accordance with the Board's previous action and direction to Staff in December 2021. In determining whether the Developer may effectuate a cure for its default with a creek restoration project, we ask the Board to require the following:

- Additional funding for creek restoration, commensurate with the original amount dedicated to this aspect of the IDA, such that the public may benefit from a *meaningful* restoration project, as originally intended in the IDA.
- Periodic progress reports from the Developer setting forth a strict timeframe with milestones to ensure a creek restoration project is on track. Suggested milestones might

⁴ Accounting of funds to organizations and Waterways Consulting (March 26, 2021), indicating \$29,782.46 remaining of \$300,000; see Attachment D.

May 13, 2022

Appeal of Determination re: Santa Barbara Ranch IDA

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be 1) identification of a project; 2) landowner consent to participate; 3) development of a plan, including a feasibility study, budget, and timeline; 4) site and plan approval by County; 5) project construction/implementation; and, 6) final report after completion. These reports will update and inform both the Board and the public as to the progress of the project and ensure future deadlines are met.

Sincerely,



Rachel Kondor
Attorney for Environmental Defense Center and the
Surfrider Foundation

LAW OFFICE OF MARC CHYTILO, APC



Ana Citrin
Attorney for Gaviota Coast Conservancy

cc: Lisa Plowman, Planning and Development Director
Christopher Schmuckal, Planner

Attachments

Attachment A

From: Lieu, Nicole
Sent: Monday, July 6, 2020 6:28 AM
To: Tuttle, Alex <Atuttle@co.santa-barbara.ca.us>
Subject: DP Restoration

Hi Alex,

Please see the attached from Moe. I think they need to include actual restoration of habitat as some part of the proposal. Also, it seems odd to me to allocate restoration funds to fund them writing grants for more funds. I would probably ask them to remove that line item. The alternative water source item seems really vague. I'm interested in your thoughts on this. Should I ask Moe to meet with us at 10 am on Wed to discuss?

Thank you,

Nicole

Attachment B

From: Lieu, Nicole
Sent: Monday, July 6, 2020 12:56 PM
To: 'Mauricio Gomez' <mgomez@schabitatrestoration.org>
Cc: Tuttle, Alex <Atuttle@co.santa-barbara.ca.us>
Subject: Restoration proposal

Hi Moe,

Alex and I were able to review the proposal so I don't think we need to meet this week. Here are our comments:

- The proposed fencing installation (part of task 1) and surveying (part of task 2) are appropriate tasks. Please provide a more specific proposal with details of the work that would occur including an exhibit of where fencing would be located and the area where surveys would occur. It would also be helpful if this included ways of measuring success in terms of the assessment – what is the desired outcome and what type of restoration efforts will it lead to?
- Some funds should be allocated toward actual biological restoration/enhancement. You had previously mentioned removal of iceplant and tree planting.
- The alternative water source is a separate project that TNC is undertaking to resolve a longstanding violation created by the prior owner so it doesn't seem appropriate to allocate funds towards that project. This item should be removed.
- The funds are primarily intended to support restoration work and not to fund grant writing to get more funds. Funds for this line item should be eliminated or drastically reduced. If funds are allocated here then there needs to be detail about what it is for and what it will accomplish. However, this should be the last area where funds are allocated.

Once you have a revised proposal please send it along for review.

Thank you,

-Nicole

Attachment C

From: Lieu, Nicole
Sent: Wednesday, July 29, 2020 2:49 PM
To: Wilson, Jeffrey; Seawards, Travis
Cc: Tuttle, Alex
Subject: FW: Santa Barbara Ranch IDA Compliance - Creek Restoration
Attachments: Letter to SBC re Proposed Alternative Creek Restoration Project_2020_07_29.pdf; IDA.pdf

Importance: High

Dear Jeff and Travis,

Please forward this email to Lisa if you see fit. In response to the letter sent to me and Lisa today by Linda Krop today (see attached) I wanted to note a few things for your consideration. The letter pertains to the requirements of Section 2.02 of the Santa Barbara Ranch Inland Development Agreement (IDA is also attached). Section 2.02 requires that the Developer (not the County) enter into an agreement with a conservation organization to implement a creek restoration plan at Dos Pueblos Creek, and if the plan cannot be implemented within a certain timeframe, that they seek approval from the County for an alternative plan.

The status of this is that the Developer was unable to obtain approval from the required property owners (and to meet other obligations defined in the IDA) to implement the Dos Pueblos Creek restoration plan and so they now need to seek County approval for alternative restoration plan. We have been working with Moe Gomez of South Coast Habitat Restoration on finding an acceptable alternative project(s). However, to date, none of the proposals have been acceptable in our view. Last week, Brian Trautwein asked to meet with Alex and I to discuss a number of items. During that call we briefed him on the status of the SB Ranch restoration. We identified that Moe Gomez had sent us a request for alternative projects that we had not approved. Brian asked to see that request and we provided it to him. The letter sent today criticizes the proposal sent by Moe Gomez, so I am not sure if Brian communicated to Linda Krop and Marc Chytilo that the proposal is not something approved by P&D and that we had in fact already found it unacceptable.

The letter also requests an accounting of where the funds have been spent and criticizes the already-completed expenditure of certain funds as not constituting "implementation." My understanding of the County's obligation differs from what is presented in the letter and is partly based upon prior consultation with counsel (we worked with Brian Pettit). I would recommend that we consult with counsel on the letter and the obligations that the County, Developer and resource conservation organization each have.

Thank you,

Nicole

From: Linda Krop <lkrop@environmentaldefensecenter.org>
Sent: Wednesday, July 29, 2020 1:52 PM
To: Plowman, Lisa <lplowman@co.santa-barbara.ca.us>
Cc: Lieu, Nicole <nlieu@co.santa-barbara.ca.us>; Marc Chytilo <marc@lomcsb.com>; Ana Citrin (ana@lomcsb.com) <ana@lomcsb.com>; Brian Trautwein <btrautwein@environmentaldefensecenter.org>
Subject: Santa Barbara Ranch IDA Compliance - Creek Restoration

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Dear Ms. Plowman,

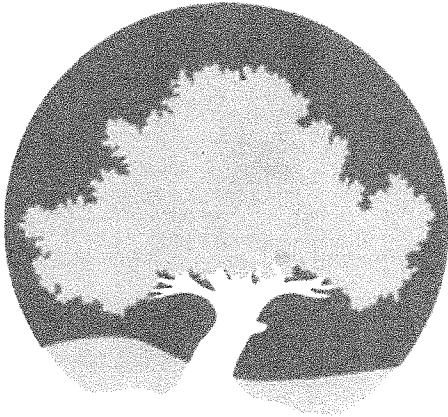
Please see attached letter from EDC and the Law Office of Marc Chytilo regarding the proposal for an Alternative Creek Restoration Project pursuant to the Santa Barbara Ranch Inland Development Agreement (IDA). As you will see, we have several questions about the developer's compliance with the IDA and the proposed alternative plan. We look forward to your responses. If you have any questions regarding this request, please do not hesitate to contact us.

Thank you,

LK

LINDA KROP
CHIEF COUNSEL
906 Garden Street
Santa Barbara, CA 93101
805.963.1622 x 106
www.EnvironmentalDefenseCenter.org

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environmental

Attachment D

Dos Pueblos Creek Restoration Funds Accounting- 3.26.2021

CRCD/SCHR Project Management (86% of funds expended)

- Site visits to watershed with team members (CRCD ED, SCHR staff, engineers, landowners and representatives) (CRCD- 15%; SCHR – 20%)
- Communication with various team members and interested parties (CRCD ED, SCHR staff, engineers, landowners and representatives) (CRCD- 70%; SCHR – 40%)
- Grant research and writing (SCHR – 15%)
- Communications with SB Planning Department (CRCD- 5%; SCHR – 5%)
- Communication with landowners/managers on potential projects to transfer funding (CRCD- 10%; SCHR – 20%)

Waterways (14% of funds expended)

- Site visits; Meetings with owners, SCHR and CRCD- 33%
- Surveying, mapping, modeling- 37%
- Concept level planning- 30%

Dos Pueblos Creek Designation:

Beginning Balance	\$	297,500.00
SCHR	\$	(56,277.50)
Cachuma Services Invoice #01-2018 - CRCD	\$	(13,261.50)
Earth Island Institute	\$	(23,122.50)
Cachuma Services Invoice #01-2019 - CRCD	\$	(3,024.00)
Earth Island Institute	\$	(15,571.25)
Cachuma Services Invoice #02-2019 - CRCD	\$	(3,584.00)
Earth Island Institute	\$	(5,559.24)
Cachuma Services Invoice #03-2019 - CRCD	\$	(4,480.00)
Waterways Consulting	\$	(31,885.00)
Earth Island Institute	\$	(7,220.00)
Earth Island Institute	\$	(6,055.00)
Earth Island Institute	\$	(5,115.00)
Cachuma Services Invoice #04-2019 - CRCD	\$	(5,120.00)
Earth Island Institute	\$	(3,567.50)
Cachuma Services Invoice #01-2020 - CRCD	\$	(3,840.00)
Earth Island Institute	\$	(18,675.00)
Waterways Consulting	\$	(5,609.02)
Cachuma Services Invoice #02-2020 - CRCD	\$	(4,096.00)
Earth Island Institute	\$	(6,047.50)
Cachuma Services Invoice #03-2020 - CRCD	\$	(2,944.00)
Cachuma Services Invoice #04-2020 - CRCD	\$	(1,024.00)
Earth Island Institute	\$	(4,097.50)
Earth Island Institute	\$	(37,542.00)
Total	\$	<u>29,782.49</u>