



September 7, 2018

Bureau of Land Management, U.S. Department of Interior
Attn: Bakersfield RMP Hydraulic Fracturing Analysis
3801 Pegasus Drive
Bakersfield CA 93308
blm_ca_bkfo_oil_gas_update@blm.gov

RE: Scoping Comments

To Whom It May Concern:

Thank you for this opportunity to provide the Bureau of Land Management (“Bureau”) with our comments on the Bureau’s Notice of Intent for Potential Amendment to the Resource Management Plan (“RMP”) for the Bakersfield Field Office, California, and To Prepare an Associated Supplemental Environmental Impact Statement, published in the *Federal Register* on August 8, 2018. The supplemental EIS will analyze the impacts of hydraulic fracturing (“fracking”) on Bureau-administered public land and mineral estate in the Bakersfield Field Office Planning Area, which includes Ventura, Santa Barbara, San Luis Obispo, Kern, and surrounding counties.

Los Padres ForestWatch is a local, community-supported nonprofit organization that works to protect public lands throughout California’s central coast region. We safeguard wildlife habitat, wilderness landscapes, rivers and streams, and outdoor recreation opportunities in places like the Los Padres National Forest, Carrizo Plain National Monument, and other public lands that are owned and enjoyed by millions of residents and visitors each year.

We have reviewed the Bureau’s notice, map, and accompanying GIS parcel data. Based on our review, we have serious concerns about the potential environmental, public health, and safety impacts posed by fracking and oil drilling on lands that the BLM has designated as “open” for new oil leasing and fracking. These impacts must be evaluated in the supplemental EIS and mitigated as appropriate. They must also form the basis of various alternatives that the Bureau explores and evaluates in the supplemental EIS, including but not limited to an alternative that would reclassify these parcels as “closed” to new drilling and leasing, and/or additional objectives, decisions, and stipulations included in the RMP.

As another preliminary matter, we continue to object to the Bureau's excessively narrow timeframe in which to submit scoping comments. The Bureau denied our request for a 30- to 60-day time extension, even though such an extension would not materially affect the Bureau's ability to complete this analysis in a timely manner. The scoping process forms the foundation for the Bureau's environmental analysis, and an unusually short timeframe for such a complex undertaking with widespread community interest does not start things off on the right foot. Reasons for an extension include:

- **The BLM did not make its GIS mapping data available to the public until halfway through the comment period.** The map that accompanies the Bureau's August 8 notice is of such poor quality that it fails to adequately notify the public about the scope of the proposal including which lands are covered under the analysis. The map covers eight counties on a single page and is at such a coarse scale that the public cannot zoom in to identify specific parcels. The map also fails to identify key areas like the Los Padres National Forest, Carrizo Plain National Monument, and other areas of key interest, leaving the general public unaware of how this proposal affects these lands.

On the same day that BLM published its August 8 scoping notice, we requested the GIS shapefiles so that we would have the detailed parcel data used to create the map. The Bureau did not provide us with these files until August 21, nearly halfway through the comment period. The map shows several parcels that were indecipherable on the Bureau's original map, including several privately-owned parcels with federal mineral rights that are of critical importance to Central Coast residents. This delay materially affected our ability to submit meaningful comments, and resulted in many stakeholders not learning about the scope of the project until late in the comment period.

- **The Bureau's map is misleading.** It conceals several parcels that are "open" for drilling/fracking by using a thick, non-transparent border around the planning area. This completely hides from view places like the naval bases in Ventura County and several other coastal parcels, which the Bureau's GIS data reveals are "open" for drilling/fracking. The Bureau's map omits San Nicolas Island entirely, which is also classified as "open" to drilling/fracking and is located within the planning area (Ventura County). And it does not show many small parcels of land classified as "open" because they are not large enough to be visible at the eight-county scale.
- **The BLM failed to notify key stakeholders and interested parties about the comment period.** The NEPA requires the Bureau to notify interested parties about all stages of the decision-making process, including the scoping period. However, most elected officials we contacted were completely unaware of the Bureau's proposal and comment period, including members of Congress and other elected officials, cities with lands directly affected by the proposal, sister federal agencies like the National Park Service, the U.S. Navy, and the U.S. Air Force whose lands are classified as "open" to drilling and fracking, and landowners with lands directly affected by the proposal.

- **The Bureau’s proposed action is not consistent with the Bureau’s GIS mapping data.** The Bureau states that the proposal covers “Fresno, Kern, Kings, Madera, San Luis Obispo, Santa Barbara, Tulare, and Ventura counties in California and encompasses approximately 400,000 acres of public land and an additional 1.2 million acres of Federal mineral estate (i.e., split estate).” However, the planning area also includes a small portion of Monterey County (approx. 18,200 acres) and the GIS data covers only 981,871 acres total (federal land and federal mineral estate combined). The discrepancy between the GIS data (981,871 acres) and the Bureau’s narrative (1.6 million acres) needs to be resolved and the public needs to be given enough time to work with the corrected data to form accurate, meaningful comments.

For these reasons, we continue to believe that an extension of the scoping comment period is warranted. Looking ahead, we request that the Bureau evaluate the following issues in the draft supplemental EIS.

Impacts to Los Padres National Forest

The Bureau’s analysis should evaluate the impacts of leasing, drilling, and fracking on lands adjacent to the Los Padres National Forest in Ventura, Santa Barbara, San Luis Obispo, and Kern counties. Impacts specific to these locations include visual and noise impacts associated with outdoor recreation on trails, campgrounds, and along key access routes leading into the national forest. Impacts to be evaluated should include exploration, drilling, fracking, and maintenance activities, including but not limited to truck traffic along these key routes, including:

- Nearly 2,500 acres in the Huasna Valley and surrounding foothills are classified as “open” to leasing, drilling, and fracking. Included among them are several parcels alongside **Huasna Road**, one of the key gateways into the Los Padres National Forest.
- Several BLM parcels totaling 1,793 acres in a rural, remote canyon east of Santa Maria, would also be opened under the plan. One of the largest parcels straddles **Colson Canyon Road**, one of the few gateways into the Los Padres National Forest in northern Santa Barbara County.
- Approximately 13,375 acres along the foothills of the Sierra Madre Mountains in the Cuyama Valley, most of which are adjacent to national forest lands proposed for wilderness protection under the Central Coast Heritage Protection Act introduced in the House and Senate earlier this year, could be opened to drilling and fracking under the plan as well. Two of these areas are major gateways into the Los Padres National Forest — **Santa Barbara Canyon and Bates Canyon**. Both have publicly-accessible trailheads and roads leading into the Los Padres National Forest.

Two BLM parcels along the crest of the Santa Ynez Mountains — one on the north face of Bald Mountain and the other in the headwaters of Nojoqui Creek near Nojoqui Falls County Park — and directly adjacent to the Los Padres National Forest are also noted as “open” to leasing, drilling, and fracking.

The Bureau’s analysis should also evaluate the impacts of leasing, drilling, and fracking on several adjacent wilderness areas, including:

- **San Rafael Wilderness (Santa Barbara County):** The Bureau’s GIS data shows as “open” a 120-acre plot of private land with Bureau-administered mineral estate located directly adjacent to the San Rafael Wilderness Area.
- **Machesna Mountain Wilderness (San Luis Obispo County):** The Bureau’s GIS data shows as “open” a 480-acre plot of federal land directly adjacent to the Machesna Mountain Wilderness.

The supplemental EIS should also evaluate the impact of how future leasing, drilling, and fracking could impact the eligibility of potential wilderness lands in the planning area. Several thousand acres of Bureau-administered land and mineral estate are located on or directly adjacent to lands identified for wilderness designation in the Central Coast Heritage Protection Act (S.1959 and H.R.4072) introduced in both the Senate and the House in 2017. The Bureau’s GIS data identifies the following lands as “open” for leasing, drilling, and fracking:

- 657 acres of mineral estate below proposed additions to the Machesna Mountain and Garcia wilderness areas in San Luis Obispo County;
- Approximately 280 acres of mineral estate adjacent to the proposed Black Mountain Wilderness Area in San Luis Obispo County; and
- Approximately 5,300 acres adjacent to proposed Wilderness additions, including the Beartrap Unit (Machesna Mountain Wilderness), Hi Mountain Unit (Santa Lucia Wilderness), Moon Canyon Unit (San Rafael Wilderness), Peak Mountain Unit (San Rafael Wilderness), Fox Mountain Unit (San Rafael Wilderness), and Cuyama Peak Unit (Dick Smith Wilderness).

Impacts to Carrizo Plain National Monument

While the planning area does not include lands inside the Carrizo Plain National Monument (that area has its own separate management plan), it would allow leasing, drilling, and fracking across 15,338 acres directly adjacent to the monument’s eastern boundary in the Temblor Mountains. The Bureau’s analysis should evaluate the impacts to monument objects of such extensive development of the monument’s boundary.

A significant portion of the rare plant association known as the upper Sonoran sub-shrub scrub community occurs in this area. This plant community is found only in the Temblor Range, the nearby San Emigdio Range, and on a very limited basis in the Greenhorn Mountains. Additionally, a rare woodland community known as Tucker oak woodland extends from the Carrizo Plain National Monument down the east side of the Temblors through the parcels zoned as “open.” Moreover, the area is identified as a wildlife corridor in the San Joaquin Valley Recovery Plan, expanding its significance to the San Joaquin suite of species and providing habitat connectivity between the San Joaquin Valley and the Carrizo Plain National Monument.

Impacts to Carrizo Plains Ecological Reserve

The Carrizo Plains Ecological Reserve is a 38,900-acre wildlife preserve that connects the Los Padres National Forest to the Carrizo Plain National Monument, and is owned and managed by the California Department of Fish & Wildlife. However, the Bureau owns portions of the mineral rights underlying the area, most of which (12,802 acres) are zoned as “open” to leasing, drilling, and fracking. The Bureau’s supplemental EIS should analyze the impacts of these activities on several endangered species that occur in the area along with native grasslands, vernal pools, and reintroduced populations of tule elk and pronghorn antelope. Several hiking and equestrian trails pass through the lands slated for drilling — the supplemental EIS should evaluate impacts to outdoor recreation as well. Based on that evaluation, the BLM should consider strengthening the CSU-Chimineas Ranch lease stipulation and/or close the area to leasing, drilling, and fracking entirely.

These lands were acquired and established as a state Ecological Reserve because of their statewide significance. When acquiring lands for the Reserve in 2004, the California Wildlife Conservation Board (“WCB”) recognized the regional, state-wide, and national importance of this area, stating that the lands were important “for the protection of several sensitive plant and animal species and to provide a direct link between the Los Padres National Forest and the Carrizo Plain National Monument (CPNM), explaining:

The CPNM is the largest remaining tract of the San Joaquin Valley biogeographic province with limited human alteration containing a diverse complex of habitats with very limited distribution. It includes the largest remaining contiguous habitats for many endangered, threatened and rare species such as the San Joaquin kit fox, blunt-nosed leopard lizard, giant kangaroo rat and San Joaquin antelope squirrel, supporting some of the healthiest populations of these species. The CPNF also provides habitat for many State or federally listed plant species, including the California jewelflower, Hoover’s wooly-star and San Joaquin wooly-threads. In addition, the area contains habitat for pronghorn antelope, mule deer, tule elk, sandhill cranes and mountain plovers.

The WCB also states that this area “is the key parcel towards the establishment of a regional macro preserve system which is large enough to sustain biological resources in perpetuity for the benefit of the general public and for scientific study.”

In acquiring these lands, the WCB acknowledged that “vegetative assemblies present on the Chimineas Ranch are unique. The area provides an unusual contact zone between the alkali desert scrub habitats of the San Joaquin Valley and the coastal scrub habitats characteristic of the central coast. In addition, the purposes of the acquisition were identified as providing “landscape level linkage” and to protect a “unique assemblage of habitats and species in southeastern San Luis Obispo County.” The WCB states that the Chimineas is “the link in establishing a regional reserve system ranging from western San Luis Obispo County into Santa Barbara and Ventura counties.”

Many of these lands are also located within the Caliente National Cooperative Land and Wildlife Management Area. This NCLWMA classification — established in the Bureau’s own Bakersfield Resource Management Plan — identifies lands that the Bureau manages cooperatively with the California Department of Fish & Wildlife to benefit wildlife resources and recreation opportunities.

The Bureau’s supplemental EIS should evaluate the impacts to this area of regional and statewide significance. Given the incompatibility of leasing, drilling, and fracking in this area, the Bureau should consider closing the area to leasing as part of this analysis or strengthening the objectives, decisions, and lease stipulations applicable to this area.

Impacts to Bitter Creek & Hopper Mountain National Wildlife Refuges

Several parcels totaling more than 1,500 acres are slated as “open” in the Bureau’s GIS data are located adjacent to, or within one mile of, the **Hopper Mountain National Wildlife Refuge** in Ventura County. This area serves as the hub for efforts to reintroduce endangered California condors into the wild.

In addition, several hundred acres are classified as “open” located adjacent to, or within one mile of, the **Bitter Creek National Wildlife Refuge** in Kern County. This area is also an important component of the California Condor Recovery Program.

The Bureau’s supplemental EIS should evaluate the impacts of leasing, drilling, and fracking on these national wildlife refuges and the wildlife, including California condors, that rely on them for survival. The supplemental EIS should also consider placing additional protections – including a complete closure to leasing, drilling, and fracking – in this area.

Impacts to Areas of Critical Environmental Concern & Other Special Designations

Many of the areas marked as “open” for leasing, drilling, and fracking are within the Bureau’s own Areas of Critical Environmental Concern (“ACEC”) and other special designations, including Areas of Ecological Importance (“AEI”), National Cooperative Land and Wildlife Management Areas (“NCLWMA”), and Special Recreation Management Areas (“SRMA”). The supplemental EIS should evaluate the impacts of leasing, fracking, and drilling on each area’s criteria for special designation, as well as whether any such impacts would compromise the area’s eligibility for maintaining its designation. The areas with special designations within our particular area of concern include:

- Frog Pond AEI
- Irish Hills AEI
- Caliente NCLWMA
- Temblor NCLWMA
- Temblor Range SRMA
- Bitter Creek ACEC
- Chico Martinez ACEC
- Cypress Mountain ACEC
- Hopper Mountain ACEC
- Los Osos ACEC
- Salinas River ACEC
- Tierra Redonda ACEC
- Upper Cuyama Valley ACEC

Impacts to State Parks

The Bureau’s data shows as “open” 1,222 acres of federally-owned mineral estate within **Montana de Oro State Park**, a coastal park in San Luis Obispo County that is popular with hikers, mountain bikers, equestrians, campers, and beach visitors. Many of these lands are also within the Bureau’s own Irish Hills Area of Ecological Importance as designated in the Bakersfield Resource Management Plan. The Bureau’s supplemental EIS should evaluate the impacts of leasing, drilling, and fracking on this state park, its ecological resources, and the visitor experience.

Additionally, the Bureau’s data shows a 26-acre parcel of federal mineral estate beneath and surrounding **Morro Rock**, a volcanic plug at the entrance to Morro Bay Harbor. It is protected as the Morro Rock State Preserve and is a State Historic Landmark. The Bureau’s supplemental EIS should evaluate the impacts of leasing, drilling, and fracking at this site.

The BLM’s data also identifies a small parcel on Boney Mountain in **Point Mugu State Park** as “open” for leasing, drilling, and fracking. This 40-acre parcel sits atop one of the highest peaks

in the Santa Monica Mountains National Recreation Area, and is vitally important for outdoor recreation and to local Native American tribes who consider the area sacred. The Bureau's supplemental EIS should evaluate the impacts of leasing, drilling, and fracking on the cultural and recreational values of this area. The supplemental EIS should also consider placing additional protections – including a complete closure to leasing, drilling, and fracking – in these areas.

Impacts to Local Conservation Lands

The Bureau's data marks several parcels of land as "open" for leasing, drilling, and fracking that are critical components of local conservation initiatives brokered by local governments, independent nonprofit land trusts, and mitigation banks coordinated by local, state, and federal agencies. The supplemental EIS should evaluate impacts that are unique to these areas.

The Bureau's data shows 10,282 "open" parcels within the privately-owned Wind Wolves Preserve adjacent to the **Los Padres National Forest**. Most of these parcels are within an area that is managed as "wilderness" that would be forever changed with the introduction of oil development and fracking activities.

Also zoned as "open" is a 200-acre parcel overlapping much of **Reservoir Canyon Natural Reserve**, where federal mineral rights underlie a popular loop trail with panoramic views of the San Luis Obispo and the Santa Lucia Mountains. Also "open" is a 76-acre Bureau-owned parcel directly adjacent to the **Irish Hills Natural Reserve**, a 720- acre open space. Both areas are administered by the City of San Luis Obispo with many popular trails.

In the Purisima Hills of Santa Barbara County, the Bureau has zoned as "open" four parcels totaling 160 acres owned by the **Rancho Santa Rita Preserve**, part of the state-and federally-approved La Purisima Conservation Bank. The 853-acre bank — the first of its kind in Santa Barbara County — provides a mechanism for developers and agencies to mitigate their impacts by purchasing mitigation credits at the property. The conservation bank contains a healthy population of endangered California tiger salamanders.

Further south in Ventura County, federally-owned mineral rights occur beneath the Ojai Valley Land Conservancy's **Ilvento Preserve**. This 80-acre parcel was the first land acquisition for OVLC, donated by the Ilvento Family in 1997. Located on a ridge near The Thacher School in the east end of Ojai Valley, the Preserve is host to diverse native plant communities and important wildlife corridors. The parcel is open to the public and features breathtaking views of the Ojai and Upper Ojai valleys, Topa Topa Bluffs, and Chief Peak.

These local conservation lands should be fully vetted in the supplemental EIS, and based on the significance of the impacts, the Bureau should consider disallowing leasing, fracking, and drilling in these areas by marking them as "closed." The current stipulation for CSU – Existing Surface Use/Management should be strengthened based on the Bureau's analysis.

Impacts to Reservoirs and Water Supplies

The Bureau's data marks many parcels as "open" for leasing, drilling, and fracking that are adjacent or close to key sources of clean water for our central coast communities. The supplemental EIS must evaluate the potential contamination risks that could occur if drilling and fracking is allowed within these watersheds, and to consider additional objectives, decisions, and lease stipulations to mitigate these impacts, including closure of the parcels to mineral leasing.

The Bureau's data lists as "open" a 4-acre parcel on the shore of **Lopez Lake** near the Dune Vista Trail, along with another 320 acres on a hillside a half-mile away that drains directly into the lake. These are mostly state-owned lands with federal mineral estate. The lake provides clean drinking water to the Five Cities (Arroyo Grande, Pismo Beach, Grover Beach, Shell Beach, and Oceano) and includes a popular recreation area administered by San Luis Obispo County Parks offering camping, fishing, boating, picnicking, hiking and equestrian trails, mountain biking, zip-lining, and birdwatching.

The Bureau's data also shows as "open" more than 32,000 acres of parcels in the Santa Lucia Mountains between Highway 46 and the SLO-Monterey county line. They also encompass hundreds of acres surrounding **Lake Nacimiento**. That lake is used to recharge groundwater in Monterey County, and provides water to nearby cities including Paso Robles, Templeton, Atascadero, and San Luis Obispo. The lake is also a popular water sports and camping destination for local residents.

The Bureau's data marks as "open" scattered parcels in the area bounded by Santa Margarita, Highway 58, and Santa Margarita Lake totaling more than 5,000 acres of mostly BLM-owned land. It includes several large parcels bordering and emptying into **Santa Margarita Lake**, which provides clean drinking water for the City of San Luis Obispo along with numerous outdoor recreation opportunities.

The **Whale Rock Reservoir** upstream from the small coastal community of Cayucos, and adjacent to the Los Padres National Forest, may also be affected by leasing, drilling, and fracking on a nearby 980-acre Bureau-owned parcel slated as "open." Whale Rock Reservoir serves as a source of clean drinking water for the City of San Luis Obispo and the Cal Poly campus. The City and the California Conservation Corps have also embarked on a multi-year effort here to eradicate invasive fish from the reservoir and restore steelhead that historically spawned in the area. The reservoir is popular with hikers, anglers, picnicking families, and bird watchers who flock to the area to view the reservoir's resident bald eagles, osprey, and migratory birds.

Finally, the Bureau has marked as "open" a 40-acre Bureau of Reclamation parcel on the north side of **Lake Cachuma** near Happy Canyon Road, adjacent to the Los Padres National Forest.

Two additional small Bureau of Reclamation parcels (20 acres total) south of Lake Cachuma are also marked as “open.”

Impacts to Scenic Highways

The Bureau’s data shows several parcels along highways designated as “scenic” by the State of California. Views of the surrounding landscape are particularly noteworthy along these segments, and any sort of development must be adequately evaluated and scenic impacts mitigated to protect the scenic qualities of the highway corridor. These areas include:

- Two parcels (20 acres total) along **Scenic Highway 154** in Santa Barbara County near Lake Cachuma;
- Several parcels along **Scenic Highway 1** near Pine Top Mountain at the gateway to the Big Sur coastline in San Luis Obispo County;
- Several parcels along **Nacimiento Lake Road**, an officially-designated County Scenic Highway in San Luis Obispo County;
- Several parcels along **Scenic Highway 33** in Ventura County; and
- Thousands of acres along segments of highways that the State of California has found to be eligible for scenic designation, including highways 46, 41, 101, 33, and 166 in San Luis Obispo County; highways 101 and 166 in Santa Barbara County; and highways 150, 126, 101, and 1 in Ventura County.

Impacts to Schools

The impacts of drilling and fracking can be enhanced when they are located near sensitive receptors like parks and schools. The supplemental EIS should evaluate these impacts as they relate to three parcels in close proximity to school campuses in the planning area:

- **Los Osos Middle School (San Luis Obispo County):** The Bureau’s data shows a 5-acre parcel directly across the street from Los Osos Middle School as “open” to drilling and fracking.
- **Cate School (Santa Barbara County):** The data also marks as “open” a 40-acre parcel within 2,000 feet of Cate School in Carpinteria and directly adjacent to the Los Padres National Forest boundary. This is a privately-owned parcel with federally-owned subsurface mineral rights. It is currently used for agricultural production. The

supplemental EIS should evaluate the impacts of drilling and fracking on agricultural resources.

- **The Thacher School (Ventura County):** Another parcel marked as “open” to drilling and fracking is owned by The Thacher School, a private boarding school in Ojai with a long tradition of fostering an outdoor ethic in its students. The 40-acre parcel — located between Thacher and Reeves creeks — is on the eastern edge of campus, and the mineral rights below the parcel are federally-owned, according to BLM’s data. The parcel contains a popular hiking trail near the school’s Gymkhana Field where students practice their horsemanship skills and participate in annual competitions and races. It also includes segments of five hiking trails: Huntington, Forest Cooke, Wyman, and Hoyt-Isaacson.

Fracking and drilling within such close proximity to school campuses should not be allowed under any circumstances. The supplemental EIS should evaluate the significant impacts of drilling and fracking in these areas and recommend closing these parcels to leasing, drilling, and fracking.

Impacts to Military Bases

Finally, the Bureau has marked as “open” for leasing, drilling, and fracking several large areas that overlap critical military bases in the planning area. The supplemental EIS should evaluate whether leasing, drilling, and fracking is compatible with base operations and with the management plans for these areas, including the following areas shown as “open” in the BLM’s data:

- **Camp Roberts (San Luis Obispo & Monterey counties):** More than 43,000 acres of Camp Roberts, a California National Guard post where units train annually. The national guard also opens these vast lands to the public for hunting and fishing opportunities.
- **Vandenberg Air Force Base (Santa Barbara County):** More than 102,000 acres — nearly the entire base — is slated as “open” for drilling.
- **Naval Base Ventura County:** The BLM plan would also open up to drilling and fracking three properties that comprise the Naval Base Ventura County: the Port Hueneme Naval CBC, the Pt. Mugu Naval Base, and all of San Nicolas Island (one of the eight Channel Islands located offshore Ventura County).

Conclusion

From the list of key parcels above, it is abundantly clear that the Bureau has failed to adequately vet which parcels it has selected as “open” for leasing, drilling, and fracking. These

parcels form the basis of the Bureau's analysis of impacts in the supplemental EIS. We strongly urge the Bureau to use this opportunity to thoroughly evaluate which parcels will be "open" for leasing, drilling, and fracking. Preferably this would be done by releasing a new proposed action and revised map along with a new scoping comment period, so that the public can focus on a more realistic assessment of where leasing, drilling, and fracking is most likely to occur.

Please provide us with copies of all future public notices and environmental documents related to this supplemental EIS. In addition, we request that you provide us with a copy of the Bureau's scoping report as soon as it is completed. See BLM NEPA Handbook Chapter 9.1.3 ("Prepare a scoping report that discusses the issues raised during the scoping process, the issues to be addressed in the EIS, the issues that will not be addressed in the EIS and why (see section 6.4, Issues), a list of participants in the scoping process, and the views of those participants.").

Sincerely,

A handwritten signature in black ink that reads "Jeff Kuyper". The signature is written in a cursive, flowing style.

Jeff Kuyper
Executive Director