



California Watershed Posse

California Coordinated Resource Management & Planning

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Dear NPS Chief of Planning Nancy Hornor,

Our organization, the California Watershed Posse (CWP) [www.CWPosse.Org] has questions regarding the pending transfer of the nearly 4,300-acre Peninsula Opens Space Trust (POST) property Rancho Corral de Tierra. The CWP is a certified CRMP Council and serves as the San Francisco Peninsula Fire Safe Council. We understand community organizations like the Northern Coastal Communities Association (NCCA) are in contact with you, but as our line of questioning does not entirely support their specific interests, we have decided to present our inquiries separately, sharing with NCCA, media, and other organizations all correspondence and responses from the Golden Gate National Recreation Area (GGNRA) to the CWP.

GGNRA has yet to publish even a provisional General Management Plan (GMP) for this property.

[<http://www.nps.gov/goga/rcdt-faqs.htm>] We find this disconcerting. As National Park Service (NPS) observes in the link to the webpage above, *"NPS goals for the long-term management of Rancho are being developed through the General Management Plan process. A draft plan is expected to be released in 2011. More information is available on the park's website."* Actually, we find no such publication of information on either POST or GGNRA Rancho Corral de Tierra focused webpages. If we are in error, please disabuse us and provide a link in your next e-mail correspondence; we thank you beforehand. From your recent meetings with NCCA (<http://groups.google.com/group/Farallon-View>), we understand that both the publication of the GMP and the transfer of said property will occur sometime this summer or fall. We believe this timeline is inadequate for the communities adjacent to these thousands of acres to reorient to a myriad community changes. Instead, we propose the community should have at least an additional year to consider a final GMP prior to any POST to GGNRA transfer, not have both actions ensue concurrently without allowing Coastsiders sufficient time to consider or even object to their prospects. A solution observing fairness and "long-term management" would recognize a more deliberate decision making process for those communities that are your future neighbors, not rush them to an unanticipated eventuality.

The CWP objects to the existing moribund disposition of the Rancho Corral de Tierra property. We have recorded these conditions for a future documentary that will show the environment of Rancho Corral de Tierra in direct, severe conflict with best WUI and watershed management practices espoused by GGNRA, NPS, BLM, US Fish & Wildlife, CDFG, CSP, CDF, San Mateo County Fire Service, and even POST. POST owns 28,200 acres, but recently spent just \$321,000 per year to maintain them. How can our Coastsiders have faith in what POST says about their historical embrace of proper stewardship described in their mission statement, when they spend just \$11.38/acre per annum on maintenance? [<http://www.openspacetrust.org/lands/stewardship.html>] [<http://www.openspacetrust.org/about/index.html>] In its last reporting year, POST spent \$2,153 for *"expenses incurred in monitoring, inspecting, and enforcing conservation easements during the year."* This pertains to 28 separate, far-flung easements totaling 11,670 acres. This amounts to a whopping \$77.00 for each easement, or \$0.184/acre in 2009-2010 for these activities. Does not \$2153 sound more like what you would expect to hear that a homeowner, living adjacent to POST lands, might spend annually on their individual property, and not what POST spends for multiple activities at 28 POST easement holdings from Rancho Corral de Tierra, to Alviso, and then to Gilroy? However, POST did find \$3.1 million to purchase or "protect" three additional properties, while allocating compensation to outgoing President Audrey Rust of over \$310,000, and spent \$400,000 for lobbying. [http://www.openspacetrust.org/downloads/Form990_2010.pdf]

On the one hand, POST boasts of having exceeded a \$200 million advancement effort from 2001-2005, more than any private land trust. On the other hand, POST cries the poor mouth. In 2005, POST lamented the end of a “\$2.5 million grant from the Gordon and Betty Moore Foundation to fund the majority of our stewardship work. POST has been able to stretch this grant over five years to cover the costs of stewardship projects on more than 20,000 acres of open space. However, this funding is coming to an end, and we are presently seeking new support for our stewardship activities.” [<http://www.openspacetrust.org/lands/stewardship.html>] Meanwhile, back at the Rancho, POST cannot deny itself the use of prison laborers on their private sector spread. [<http://www.sanmateorcd.org/coralreef.html>] While the CWP recognizes the need for mechanical vegetative fuel removal projects like the Coral Reef Fuels Management Demonstration, we believe a financially robust institution with just five fulltime employees, with compensation averaging \$201,000 and with \$231 million total assets, could certainly make themselves a better neighbor to the residents near Rancho Corral de Tierra by performing more and spending more on maintenance. Unfortunately, a cursory examination of their financial records indicates similar fuel management behavior in previous years. In addition, the Rancho Corral de Tierra Property is designated by CDF a hazardous fire area, with a one hundred year high fuel load. In lieu of these observations, how can GGNRA possibly contemplate absorbing and opening to the public a dangerous property and an attractive nuisance project that is Rancho Corral de Tierra?

We believe the Peninsula Open Space Trust tenure of over a decade of inept stewardship of Rancho Corral de Tierra will saddle the GGNRA with a land requiring significant, or in these hard economic times, non-existent resources to amend. Thus our questions:

A **Present Compliance of Nearby GGNRA Properties**

1. Are both the GGNRA operated Phleger Estate the Sweeney Ridge presently in complete compliance with the Operational Strategy for the Fire Management Plan, GGNRA of April 2008?
[[www.nps.gov/goga/parkmgmt/upload/fire_fmp_op_strat_chapter http://s.pdf](http://www.nps.gov/goga/parkmgmt/upload/fire_fmp_op_strat_chapter_http://s.pdf)]
2. What, if any, are the deficiencies of either property?
3. Regarding GGNRA operated Phleger Estate and Sweeney Ridge: If there are presently shortcomings found to the FMP above, what is the timetable and plan for remediation?
4. If not in compliance, can NPS or GGNRA name the funding sources for bringing the Phleger Estate or Sweeney Ridge lands into compliance?

B **Rancho Corral de Tierra**

1. Is there currently available or is a study planned for determining whether the POST property Rancho Corral de Tierra complies with the Operational Strategy for the Fire Management Plan GGNRA of April 2008? [http://www.nps.gov/goga/parkmgmt/upload/fire_fmp_op_strat_chapters.pdf]
2. When considering the Operational Strategy for the Fire Management Plan GGNRA of April 2008, what, if any, are the current violations of the Rancho Corral de Tierra property?
3. If not in complete compliance with the Operational Strategy for the Fire Management Plan, GGNRA of April 2008, what are the estimated costs for bringing the Rancho Corral de Tierra property to a state of compliance?
4. Should it prove necessary, can the NPS or GGNRA name the funding sources for bringing the Rancho Corral de Tierra property into compliance?
5. If there are shortcomings to the above Fire Management Plan, what is the timetable and plan for remediation?

C GGNRA and Projected Maintenance Expenses of Rancho Corral de Tierra

1. What are the future operational cost projections by GGNRA to maintain Rancho Corral de Tierra?
2. We would like to consider such projected costs versus known expenditures. For the past three fiscal years, what are all the operational costs to NPS/GGNRA for the Phleger Estate?
3. Likewise, for the past three fiscal years, what are the operational costs of GGNRA Sweeney Ridge?

D Public Access to the San Francisco Peninsula Watershed and Adjacent Tracts

In 1994, The San Francisco Water Department published their San Francisco Watershed Management Plans Public Opinion Survey Report. [<http://www.saveourbay.org/acrobat/file2.pdf>] This survey, taken by a diverse representation of people and cultures from around the San Francisco Bay Area, is a document meant for determining usage of watershed lands on both sides of the San Francisco Bay. A poorly maintained tract next to the watershed, poised to receive an unknown increase in the number of visitors, should be the GGNRA's first level of concern for this project. The survey shows an overwhelming desire by the populace to limit access to these lands, in order to protect the preeminent water supply to the region.

1. Does the GGNRA recognize the intent of the people found in this survey?
2. How does the increase of visitors by the establishment of trails around Rancho Corral de Tierra square with the above FMP?
3. The following is from the above FMP: *"In implementing the GGNRA FMP, the NPS will coordinate with the SFPUC Land and Resources Management Section to ensure that NPS actions conform to the Watershed Management Plan and FMP to the extent possible that allows NPS to its objectives. GGNRA staff meets annually with the SFPUC Land and Resources Management Section to discuss issues of joint interest and will inform SFPUC staff of proposed fire management actions at the Phleger Estate and Sweeney Ridge".* Could you inform CWP of the minutes from the last GGNRA/SFPUC annual or other meetings that address coordination of the two organizations?
4. We would like to consider projected number of visitors to Rancho Corral de Tierra versus parkland already held by GGNRA. For the past three fiscal years, could you inform the CWP of how many of the 17 million visitors to the GGNRA visited the Phleger Estate and Sweeney Ridge? [<http://www.calparksguide.com/?p=1110>]
5. Can the GGNRA project the number of visitors the first five fiscal years of obtaining Rancho Corral de Tierra?

E Federal and State Environmental Regulations

1. Does the GGNRA have available the applications regarding permits for improvements, to include parking, fencing, and all other changes establishing trailheads in WUI neighborhoods?
2. Could the GGNRA please inform the CWP of the disposition of all coordinated applications with the California Coastal Commission, as well as verification of each improvement or change with CEQA?

The California Watershed Posse recognizes that the unfortunate care of Rancho Corral de Tierra land is not the doing or burden of NPS/GGNRA. However, we do believe NPS/GGNRA must not take responsibility for or possession of this property before Peninsula Open Space Trust brings the property into compliance with best WUI and watershed management practices, as directed by GGNRA's own FMP. The California Watershed Posse [<http://cwposse.org/html/yourmission.html>] aka as the Half Moon Bay Coastside Foundation, has been devoted for nearly twenty years establishing a coastal Rural Lands Fire Safe Council Consolidated Resource Management Plan (CRMP) to protect San Mateo County's Watershed natural systems and its Hetch Hetchy water resources in perpetuity. Our opinion is the existent state of the Peninsula Open Space Trust property Rancho Corral de Tierra is a threat to that resource.

Please contact me if I may be of service.

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