



Ed Harrington  
General Manager  
San Francisco Public Utilities Commission (SFPUC)

Dear Mr. Harrington,

My organization, the California Watershed Posse, also known as the San Francisco Peninsula Fire Safe Council (SFPFSC), has devoted nearly twenty years establishing a coastal Rural Lands Fire Safe Council and Consolidated Resource Management Plan (CRMP) to protect San Mateo County's Watershed natural systems and its Hetch Hetchy water resources in perpetuity. [📁] Since its publication in 1994, we have supported the conclusions and management plan of the two San Francisco Bay Area watersheds as proposed in the San Francisco Water Department Public Opinion Survey Report. [📁] Therein, 85% of a diverse group of water users determined the greatest role for SFPUC was to limit access to the watershed, thereby restricting human degradation of the reservoirs and for SFPUC to act as chief authority in securing this resource. We also support the strict use of funds allocated by the voters and set aside by assorted representative government officials expressly for the maintenance, retrofits, and upgrades necessary to the aging Hetch Hetchy System (HHS). [📁][📁] Mr. Harrington, there is a growing public dissatisfaction with the fire safety, monitoring, and security of the San Francisco Peninsula Watershed and adjacent lands. We look to government agencies at all levels to prevent wildfires and protect the reservoirs to HHS, the preeminent water supply in the region. Currently, there are "Perfect Mega Firestorm" conditions that threaten the San Francisco Peninsula portion of the HHS. There exists a 100-year high fuel load in the San Francisco Peninsula watershed and adjacent properties. Federal and California State fire models assure us that a megawildfire could definitely consume a sizable length of the peninsula from Highway 280 west to the Pacific Ocean. The resulting runoff would cause an interruption of services from the HHS distribution point for an undetermined amount of time, with conservative studies indicating this period lasting two to three years. The cost of such interruption from a megawildfire or other event is over \$1 billion per day. Indeed, such an event would also destroy the State of California's economic system, not just the San Francisco Bay Area economy. Without water, this city with a population three times the size of pre-Katrina New Orleans would face a similar necessary abandonment, along with many other municipalities throughout our region. [📁]

Mr. Harrington, we find the many bureaucracies holding and controlling these lands have, through inept management and by not adhering to their controlling documents, now harbinger a growing level of distrust with the citizenry. Regrettably, it is the opinion of the California Watershed Posse that Peninsula Open Space Trust (POST), the largest private land trust in the United States, is just such an instance of the lamentable type of agency mentioned. We say this because:

### **POST**

- With the exception of one year out of the past six, POST has spent exceedingly more in the categories of fundraising and lobbying versus the maintenance of the 28,200 acres they own. [📁]
- Recently, this maintenance amounted to just \$11.38/acre per year. [📁]
- Additionally, POST spent just \$2153 "monitoring and inspecting" 28 easements spread over an area of 80 miles and totaling 11,670 acres. That is just \$77.00 for each easement, or \$0.184/acre in 2009-2010 for these activities. [📁]
- Despite annually averaging tens of millions of dollars in funding, POST is somehow unable or unwilling to complete on their property a Vegetation Management Plan (VMP) action in a San Mateo County neighborhood in the highest category of fire danger. [📁][📁][📁]

- Given the 28,200 acres possessed by POST, the insignificant amount of mechanical vegetation removal declares a lack of a comprehensive VMP for their properties. Fire roads on POST properties are dilapidated or nonexistent. [📁]
- Without an Environmental Impact Report (EIR), a General Management Plan (GMP), or the implementation of an excellent existing Fire Management Plan (FMP), POST is already inviting an unknown number of visitors into Wildland Urban Interface (WUI) neighborhoods. There is no control regarding ingress routes onto the property, or to who might access Rancho. [📁|📁|📁|📁|📁|📁]

As a localized example of POST's detrimental effects within WUI neighborhoods, I would like to bring your attention to a recent article in the Half Moon Bay Review on September 1, 2011. [📁] This article looks into the complaints of a group of residents in an El Granada, CA neighborhood, specifically complaints about the lack of fire preparedness in lands adjacent to their properties. These are families concerned with the property known as Rancho Corral De Tierra (Rancho), some 4,300 acres literally in their backyard. Rancho is a poorly maintained WUI property owned by POST. I am hoping you are familiar with the Rancho property, because this is also your backyard. The SFPUC's 23,000 acres of San Francisco Peninsula watershed lands share a significant border with Rancho, as well as other GGNRA properties.

Merideth Lamont, a resident of El Granada, forwarded to the HMB Review her letter to Coastside Fire Marshall Clayton Jolley and CDF Chief Richard Sampson. Her copying this correspondence to the HMB Review prompted the article. [📁] As stated in the piece, Ms. Lamont is concerned about "several piles of brush on the outskirts of the land." The truly curious will find these piles of brush visible on Google Earth. Lost in the article's commentary, but seen in her letter linked above, is Ms. Lamont's illumination that these large piles of logs and brush are remains from a VMP action performed in July 2010. The VMP action, performed in 2010, was the result of a correction notice from the Coastside Fire Protection District to POST regarding the "unacceptable nature of the lot and its status as a fire hazard to the neighborhood." [📁]

Ms. Lamont then provides links to California Department of Forestry and Fire Protection (CDFFP) maps; the very same SFPUC and other entities use to help determine fuel loads and fire risk. Of course, they show her neighborhood and Rancho in the highest category of fire danger. Ms. Lamont goes on to cite California Code statutes she believes applicable to the present derelict state of Rancho and the inobservance by POST to the defensible space standards imposed on other private landowners in El Granada. Nevertheless, POST seems hell-bent placing these nearly 4,300 unkempt acres into the care of the GGNRA, a cash-strapped agency who employs some who cannot interpret or are ignorant of such CDFFP maps of San Mateo County. HMB Review reporter Lily Bixler has GGNRA Representative George Durgerian stating that a fire threat in the area is low. In lieu of the maps and other federal and state documents that stand athwart his statement, we find Mr. Durgerian and the GGNRA view puzzling and absurd. [📁|📁] Durgerian further discounts Ms. Lamont's concerns, indicating Lamont and others should moderate their fears because humidity on the coast reduces the chance of fire. I would suggest to Mr. Durgerian to review that the CDFFP contends otherwise, with proof found in the northern part of Santa Cruz County that has more than twice the humidity as Rancho during the summer and early fall months. That county suffered a nearly 8,000-acre fire just over two years ago in areas without the significant and highly combustible eucalyptus stands encompassing El Granada. [📁] Mr. Harrington, this article is just one example of public agencies like GGNRA and POST ignoring the documents and policies that should direct their organizations. Our opinion is the GGNRA has willingly abandoned implementation of the standards set forth by their own FMP during the process of obtaining Rancho from POST, and that Ms. Lamont, her neighbors, all San Francisco Peninsula residents, as well as all SFPUC water users, have the right to fear susceptibility to a megastorm in the watershed and adjacent lands. [📁|📁] We express this because:

### GGNRA

- In their FMP, GGNRA has portrayed a fictional reciprocal work and peer consultation arrangement with SFPUC for other GGNRA properties that adjoin the SFPUC watershed. [📁|📁]
- The California Watershed Posse can show documentation that Rancho in no way meets standards of the GGNRA FMP. [📁]

- Without Environmental Impact Reports (EIR), a General Management Plan (GMP), or the implementation of any FMP, the GGNRA, like POST, is already inviting an unknown number of visitors into WUI neighborhoods. After more than a month, the GGNRA is unable to answer even one of nineteen questions asked by the California Watershed Posse. [📁|📁|📁]
- Despite knowing for over a decade they would possess Rancho, GGNRA did not prepare a specific General or Fire Management Plan for this property. Instead, it appears GGNRA partnered with a familiar POST staff in ignoring what law mandates for such transfers. [📁|📁]
- Like POST, the insignificant amount of mechanical vegetation removal on GGNRA properties indicates lack of an inclination to develop and implement comprehensive VMP. Fire roads on GGNRA properties are dilapidated or nonexistent.
- There is no control regarding ingress routes onto the property, or to who might access GGNRA Phleger Estate or Sweeney Ridge properties.
- The GGNRA is unable to provide documents confirming the Rancho acquisition complies with the California Coastal Commission, the National Environmental Protection Act (NEPA) or the California Environmental Quality Act (CEQA).
- In a Midcoast Community Council meeting on August 1, GGNRA Planner Brian Aviles conceded that the Rancho property was a “fixer-upper.”

### **Conditions of Other GGNRA Properties Adjacent to the SFPUC Watershed**

Similar to Rancho, the GGNRA properties of Sweeney Ridge and the Phleger Estate lack any monitoring or security, allowing unfettered access from all directions. The California Watershed Posse can demonstrate that Sweeney and the Phleger currently cannot meet the standards set forth in the GGNRA FMP. The Rancho property is more than double the size of Sweeney and Phleger, whereas the numbers of first responders, their equipment, and financial support will remain the same. Mr. Harrington, the unfortunate fact is that the GGNRA is already overburdened by their present responsibilities. In early July, the California Watershed Posse had the opportunity to meet with CDF Chiefs John Ferreira and Richard Sampson to review current conditions on the San Francisco Peninsula. El Granada resident Merideth Lamont also participated for the Northern Coastal Communities Association. We reviewed all the information above, and so much more. Given that after GGNRA acquisition the unqualified 4,300 acre Rancho property will no longer be designated a State Responsibility Area (SRA), we presented questions about future fire protection for Rancho and the San Francisco Peninsula. In short, the two chiefs verified the future prospect of the same resources for increased responsibilities.

After hearing this, we asked Chief Ferreira to exert his authority to Red Flag access denial all areas recognized by the county of San Mateo and the State of California as having the greatest fuel loads and chances of catastrophic fire, a fire that would most likely start by human acts. We explained we preferred for a Red Flagging condition commence until all the property in question, to include current scenic easements, can meet the unimplemented standard of the GGNRA FMP. A Red Flagging condition would cost nothing to declare, but give Chief Ferreira all authority for complete denial of access, as well as the pulpit in the media for such a declaration. We further asked Chief Ferreira to join us in opposing transfer of Rancho for all reasons above. Chief Ferreira declined our requests.

Mr. Harrington, the motto for fire vigilance is often referred to as the three-legged stool of ***Protection, Detection, and Response***. In this hour, we believe the order needs inverting; we believe that the San Francisco Bay Area and California requires the ***response*** of the SFPUC General Manager to take leadership with the fire safety, monitoring, and security of the San Francisco Peninsula Watershed and adjacent lands. We ask you to assume the total authority of your office and the mandate given you by the People through the San Francisco Water Department Public Opinion Survey Report. [📁] We ask that you prevail with initiating through Sacramento a Red Flag emergency condition where others choose not to act. If other agencies will not implement their own programs, we ask that you insist on enforcement of the San Francisco Peninsula Watershed Fire Management Plan for the welfare and safety of the People, the Hetch Hetchy System, the environment, and the economy of California. [📁] We request you contact the Department of Interior and the California Delegation to the U. S. Congress and tell them they must cease the transfer of Rancho Corral de Tierra to the National Park Service until such parcel is fully qualified.

The emerging season of the tenth anniversary observation of 9/11 is a poignant time for the California Watershed Posse. It so happens that the Posse lost one of our own in the terrorism that day, with the death of co-founder and legal counsel Alan Beaven aboard United Airlines Flight 93. [📁] After the 9/11 attacks, the California Watershed Posse was contacted by the FBI to report on the eco-terrorist, and anti-community efforts in San Mateo County, with particular consideration of the Hetch Hetchy System. [📁] The FBI then and now regard HHS as the most significant terrorist target in northern California. Our update in July of this year with the FBI Counter Terrorism Task Force had the California Watershed Posse reporting an even greater danger to our unsecured watershed and infrastructure.

Mr. Harrington, the California Watershed Posse would welcome the opportunity to meet with you to explore alternative methods to security and fire protection. On September 14, 2011, the Midcoast Community Council has scheduled a meeting where the group Northern Coastal Communities Association will explain their apprehensions vis-à-vis the Rancho transfer. [📁] Mr. Harrington, will you or a Person Most Knowledgeable attend? We would look forward to meeting you in both situations.

Best Regards,

*Joseph F. Shaughnessy*

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