



## Ventana Wilderness Alliance

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406 South Mildred  
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*VIA EMAIL*

### **RE: Comments on the Draft *Milpitas Special Interest Area Collaborative Management Plan***

Dear Sherry, Doug and Bob –

Thank you for this opportunity to provide comments on the current draft *Milpitas Special Interest Area Collaborative Management Plan* (hereinafter Milpitas SIA plan).

The specialness of the Milpitas area, also known to many as ‘the Indians’, is clear from talking with anyone who has spent any amount of time there. Both a home, as well as a “home away from home” for many generations, this pocket of oak, sandstone, grassland and stream contains visible chapters from nearly every century of human history – from Native American habitation through to the early days of the U.S. Forest Service.

By focusing on collaborative, hands-on stewardship of this amazing public land resource, the Milpitas SIA plan recognizes that only through real public engagement will dearly-loved places like the Milpitas retain their specialness in our ever shrinking world.

The modern history of the Milpitas demonstrates both the benefits and potential limits of collaborative public Forest management. A broad and diverse group of individuals and stakeholders have, often independently and sometimes inadvertently, lent an active hand to the management of the Milpitas. Volunteer Forest Site Stewards have carefully watched over fragile cultural sites; and local recreational residents helped refurbish the historic Indians Guard Station.

However, today the site steward program lacks cohesive management, focus and impact; while the Indians Guard Station stands empty except for scurrying rodents. Successful collaborative management requires a clearly prioritized plan driven by the Forest itself, or preferably, by a committed group of individuals and organizations working together with the Forest toward concrete, realizable goals. Lacking a prioritized plan and a coordinating committee any attempts at improved management may only produce transitory “spot fixes.”

The Milpitas area, along with the passion it excites in those who value this landscape, present a very real opportunity to truly manage a given piece of public land and associated resources – cultural, biological, geological, and recreational – in a collaborative manner. Realization of this potential will not only require a real investment of time and resources by the Forest Service, but also significant personal and organizational investment by the public. This

investment will include meetings to agree on actions, acquisition of resources for projects, project implementation, education of visitors, monitoring and long-term stewardship of cultural and biological assets.

As the planning process wraps up and the collaborative implementation phase begins for the Milpitas SIA, it will be critical to invite and include as broad a spectrum as possible to share ideas, lend resources and produce real on the ground results. In particular, ample representation, consultation and involvement by the Native American tribes and community members who demonstrate a sacred connection with this land will be important.

The Ventana Wilderness Alliance supports the goals and objectives of the current draft Milpitas SIA plan, and we look forward to working together to sustain the ecological, cultural and recreational values which distinguish the Milpitas Special Interest Area.

### **Specific Comments**

Following are specific comments on portions of the draft plan. Comments include modifications to draft language, additional information for inclusion in the draft plan, and suggested objectives and actions.

#### **Valley Oak Research Natural Area (RNA)**

As a document to guide management of the Milpitas SIA, the plan and attendant maps must reflect the entire management picture of the area. In particular, the draft Plan and attendant maps should be amended to include the boundaries and brief description of the recently designated Valley Oak Research Natural Area.

Research Natural Areas are designated to “protect a network of federally administered public lands for the primary purposes of maintaining biological diversity, providing baseline ecological information, and encouraging research and university natural-history education.”<sup>1</sup>

Designated by the 2005 LPNF Forest Plan, the Valley Oak RNA preserves one of the “few remaining examples of valley oak woodlands on public lands in California” and “represents one of the few remaining areas on the Central Coast that offer research opportunities in valley oak.”<sup>2</sup>

Special management consideration should be afforded to this RNA in the proposed new grazing management plan for the Milpitas. Option considered should include measures such as exclusion fencing and educational signage to ensure this RNA is allowed to serve its purpose as a public research asset. In particular, this RNA presents an outstanding opportunity for comparative restoration techniques to facilitate needed valley oak regeneration.

#### **Management Objective: Maintain Dispersed Camping**

Under the first Management Objective (hereinafter MO), the Forest should include an action detailing the need to officially designate a road system in the Milpitas area. Currently, the roads used for dispersed camping (aka the ‘numbered roads’) are all unauthorized, nonsystem roads. This oversight left over from the formal route designation process on the Los Padres National Forest should be cleared up to ensure continued public use, as well as thoughtful protection of resources.

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<sup>1</sup> <http://gis.fs.fed.us/psw/programs/rna/>

<sup>2</sup> Los Padres National Forest Land Management Plan Part 2, p36 and p97, September 2005

MO: Provide interpretation at the entrance

As noted at the public meeting in King City, community members have previously approached the Forest Service with the desire to fabricate informational kiosks for the entrance to Milpitas. This action is a low-cost, low NEPA, high-impact action that should be prioritized for implementation.

A sign-in station, as well as an “iron ranger” to accept donations should also be constructed at the entrance station. The collection and processing of the sign-in forms should be incorporated into the duties of the proposed Milpitas Site Steward Program, while donations generated from the Iron Rangers could be collected by a non-Forest entity and restricted to use maintaining and preserving the Milpitas area.

In addition to the interpretive themes listed in the draft plan, we believe the American institution of federally-designated Wilderness is an important theme central to the modern landscape of the Milpitas. The Ventana Wilderness is visible as a 360 degree panorama of chaparral peaks from anywhere in the Milpitas. The Wilderness ‘idea’ is a central theme in American public land use history and complements the many other historical chapters evident in the Milpitas.

MOs: Restore the Merle Ranch and Encinales Adobe

As noted in the public meeting, any restoration plans for historic structures in the Milpitas should include two tiers of restoration: “rehabilitation” on the high end and “stabilization” on the low end. These estimates can act as book ends for investment in the historic infrastructure of the Milpitas.

MO: Provide opportunities for hunting while discouraging target practice

VWA strongly supports restricting shooting in the Milpitas area to hunting permitted species with a designated season only (deer and bird) to ensure public safety, as well as to protect the values for which the Milpitas SIA was designated. Controlling random gun play in the Milpitas area will prove impossible if non-game (‘varmint’) hunting is allowed to continue.

Given the abundance of well-managed and accessible hunting opportunity located on adjacent Ft. Hunter Liggett land, the benefits to public safety gained through restricting non-game shooting seem significantly justifiable. The Milpitas is a heavily visited area with many families, campers and others wandering around its gentle terrain. Gun play outside of specifically designated seasons for traditional game is inappropriate in an area with such high, dispersed visitation.

Interpretive messages should also include the restriction against use of lead bullets in the Milpitas to preserve the public investment in restoring the California Condor<sup>3</sup>. Again, without limiting hunting to permitted seasons, the important restriction against lead bullets will prove impossible to enforce.

MO: Reestablish a formal Site Steward Program

This objective is perhaps one of the most important for successful implementation of the letter and spirit of this plan and should actively include all stakeholders. Additional actions should be included in the Plan to: 1) Designate a responsible Forest Service staff person as the

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<sup>3</sup> Condors are known to regularly occur and nest in the Milpitas Area. The presence of these ancient and magnificent birds should also be included in interpretive messages and management decisions.

Site Steward liaison; 2) Create a Site Steward Council of leaders to ensure implementation and continued management of the program; 3) Empower the Council and FS liaison to determine a scope of work within one year from the signing of the Milpitas SIA plan; and 4) Utilize the Indians Guard Station as a central location for Site Stewards.

*MO: Provide opportunities for visitors to see the scenic beauty of the Milpitas SIA*

In addition to maintaining routes for vehicles, this MO should include an action item to maintain non-motorized trail access through the Milpitas with specific focus on the three historic trails in the area: Arroyo Seco, Carrizo, and Santa Lucia trails.

*MO: Provide forage for cattle in a way that complements ethnobotanical management objectives*

To help ensure this objective is met, a timeline should be added to the action item calling for the development of a new allotment management plan. We believe this new plan should be completed within one year of the signing of the Milpitas SIA plan.

**Additional Management Objectives**

We recommend the inclusion of a Management Objective similar to those for the Merle Ranch and Encinales Adobe for the historic Indians Guard Station. This very serviceable structure should be rehabilitated to facilitate occupation. Given its location on the main road directly across from Santa Lucia Memorial Park Campground, the main designated campground, this Guard Station provides a perfect location for visitor contact and interpretation. In addition to detailing cost for rehabilitation sufficient to facilitate occupation, this proposed MO should include actions to establish the Guard Station as a center for the proposed Site Steward program, as well as a house open to volunteer Site Stewards who will trade volunteer work for time in the Station. This facility, as well as the Site Steward program, could be managed through a formal partnership agreement.

In conclusion, VWA would like to thank the staff of the Monterey Ranger District and Mountain Heritage Associates for their work preparing this ambitious plan. To ensure a broad spectrum of the public has ample notice of the existence of the plan and opportunities to engage in the future of the Milpitas area, notices of future meetings and actions should not only be posted to local web resources, but also physically posted on the informational kiosks at the Milpitas entrance on Del Venturi Road and Indians Guard station. We look forward to working together with the Forest Service, local Native American tribal members and the broad community of people who cherish this unique public landscape.

Respectfully,

Paul McFarland  
Executive Director  
Ventana Wilderness Alliance