



To: Eric Tattersall, Assistant Field Supervisor; U.S. Fish and Wildlife Service
Fax: (916) 414-6713

Re: Comments on *Incidental Take Permit Application and Habitat Conservation Plan Environmental Assessment*

From: **Environmental Committee for the San Lorenzo Valley/Valley Women's Club**
Nancy Macy, Chair 831/338-6578 (landline), 831/345-1555 (cell)

Dear Mr. Tattersall,

We appreciate the extension for comments on PG&E's Habitat Conservation Plan. We have been deeply involved in issues with PG&E for decades, and are profoundly concerned about PG&E's impacts on the threatened and endangered species that inhabit the waterways and the fragile, highly erosive, steep slopes of the San Lorenzo River Watershed in the Santa Cruz Coastal Mountains. We are equally concerned that our experiences with PG&E's damage are being duplicated throughout its sphere of influence, especially in forested regions.

The Valley Women's Club is a forty year old 501-c-3 non-profit community organization, serving the San Lorenzo Valley, Santa Cruz County and the Central Coast of California. The Environmental Committee works to protect the watershed and to educate the public on forest, land and water issues, local wildlife including endangered species, pollution, septic systems, fish, and more. We also monitor and act to impact government policies and procedures, working closely with our local, state and national government representatives.

We have several concerns for Fish and Wildlife to consider before approving PG&E's Habitat Conservation Plan.

First, to allow their HCP to govern the next 30 years is untenable. A prime example is their recent (starting 2018), massive expansion of tree and vegetation removal ("Enhanced Vegetation Management" or EVM) under the guise of wildfire mitigation. The EVM has had enormous impacts already, and will be increasing over several decades, removing millions more trees than ever before imagined. Alarming, the CPUC approved PG&E's EVM in December, 2017, without environmental review, claiming it "exempt" from CEQA. This, in spite of increasing vegetation removal by about 80 times in volume, and no longer protecting "healthy, mature trees" (instead removing *any* trees that *might* impact the distribution or transmission system, with a special focus on ten valuable species). PG&E had even been given Timber Harvest Plan Exemption Permits by CalTrans in order to remove trees up to 200 feet

from their rights-of-way. They have already been cited for violations of THP regulations, including removing trees within riparian zones. The growing impacts of the EVM don't appear to be reflected in the acreage amounts.

In addition, PG&E is being urged to rapidly expand the replacement and upgrading of its unsafe, antiquated distribution and transmission line equipment — from replacing dangerous bare wire with strengthened, triple-insulated wire to installing modern computerized protective relays and replacing poles. This is vital to fire prevention, and may potentially increase damage to endangered and threatened species.

Second, specific, important species are missing from their list. We are concerned that they failed to include the Ben Lomond Spineflower (*Chorizanthe pagans* var. *hartwegiana*). It is located in the same Sandhills as the Mount Hermon June beetle, and will most likely be impacted. **Even more important is the fact that PG&E has listed NO fish species!** Yet, it has already marked thousands of trees along important fish waterways in the San Lorenzo Valley alone. They have already been regularly cutting down trees close to and even in creeks and streams. This threatens the habitat for the endangered Coho Salmon (*Oncorhynchus Kisutch*) and the threatened Steelhead Trout (*Oncorhynchus Mykiss*). It seems evident that the miles of impacted waterways, the San Lorenzo River and its creeks and streams, could prevent the acceptance of the HCP, were they included.

Third, there is inadequate indication of the relative threat to some species to enable F&W to determine if the number of acres of disturbance or loss will undermine one or another's survival. An example is the Robust Spineflower. Only a small acreage will be impacted, but even that is a significant impact since there are fewer than ten populations remaining of this critically endangered and uniquely special plant.

While PG&E has obviously endeavored to provide precise acreage disturbed or damaged, **it is not clear how much impact the temporary disturbance will have - it may potentially undermine a significant number of one or another species.** A case in point is the *Mount Hermon June Beetle* that resides in the very few acres left of the Sand Hills habitat in Santa Cruz County. The San Lorenzo Valley Water District owns a large section of that habitat where its Olympia Wells are located. They have been severely impacted the the costs and controversy of removing invasive broom plants when doing so might impact this June Beetle, since it resides in the top four inches of soil. Will the 22.5 acres of temporary disturbance further undermine this remarkable species' ability to survive since it is unique to this tiny area - the remarkable Sand Hills.

There are other concerns but these are among the most significant, and each concern is also an issue throughout the forested and wild regions that the HCP will impact. We sincerely hope that you will reconsider the length of the duration of the plan, since PG&E's Wildfire Mitigation Plan could both expand the area and increase the duration of its operations.

Our final concern is that we do not feel that F&W will have the wherewithal to both inspect and enforce the HCP, to assure PG&E's adherence to their plans in the coming years. We truly support the activities and mission of F&W but recognize that the current political climate is not supportive of protecting threatened and endangered species, is undermining proven scientific necessities to protect those species, and is failing to fund even the most basic functions of F&W.

And now, with the Corona Virus having such profound impacts on the US and World economies, we fear that no matter what the political climate in the future, funds may be limited.

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Thank you for your attention to our concerns. We look forward to working with you in the future.

Respectfully Yours,

Nancy B. Macy

Nancy B. Macy, Chair
Environmental Committee for the SLV

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