November 17, 2020

Santa Cruz County Board of Supervisors
701 Ocean Street
Santa Cruz, CA 95060

Re: Unpermitted Tree Cutting by PG&E

The Sierra Club urges the County to take action and to intervene to stop the unpermitted timber operations being undertaken by PG&E in the CZU Lightning Fire Zone. The ongoing tree cutting is not only unlawful and environmentally unsound, it is likely increasing the dangers of mudslides and debris flows. The Sierra Club lends full support to the 10/29/2020 letter to your Board from the Valley Women’s Club of San Lorenzo Valley (VWC), and to the 10/30/2020 letter from CalFire Department of Forestry and Fire Protection, which was copied to the Santa Cruz County District Attorney. We urge the County to take action either through County Code Compliance, or the District Attorney, or both.

We fully agree with the VWC letter’s statements that this unnecessary tree removal “increases the danger of erosion, even lethal mud and debris slides, in the burned zones, exposing residents to possible harm, endangering forest recovery and undermining wildlife survival by destroying remaining habitat. This vegetation mismanagement could increase the impact of a catastrophic debris flow.” It is clear that PG&E and its contractors are felling healthy, only superficially damaged trees. In addition to their extreme importance in support of habitat, these trees are also anchors against erosion and mudslides. The impacts to creeks and rivers from the sediment caused by PG&E’s actions here cannot be overstated.

Of significant concern to your Board is that PG&E is also cutting far outside of its right of way. We have seen the above-referenced CalFire letter and were taken by the unusually harsh assessments made by the CalFire Department of Forestry. For example:
CalFire has identified the PG&E operations as unlicensed timber operations. This is not a superficial concern, as the CalFire letter went on to discuss the risk of “massive sedimentation” into waterways, which will greatly impact fish species and surrounding habitat:

In Santa Cruz County, the Winter Operating Period starts on October 15th each year. As this inspection occurred on October 28th and no permits had been filed, there is no Winter Operating Plan in place for Timber Operation as required by the rules. These Timber Operations are therefore in violation of 14 CCR § 914.7. This is concerning as there several miles of unwinterized seasonal roads open for these operations and it is unlikely that they could be quickly winterized prior to a storm event.

In summary, we strongly urge you to take all appropriate and available actions to ensure the cessation of these unlicensed, unlawful, and destructive activities.

Yours Sincerely,

Michael Guth, Conservation Committee Chair

Micah Posner, Executive Committee Chair
Santa Cruz County Group of the Sierra Club