

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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December 16, 2021

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**Forest Practice – 21-CACZU007717**  
**NOV #2 – Wunderlich Park – Monta Vista Transmission ROW**

Dear Mr. Saenz, Mr. Long and Mr. Mulhollen

On Tuesday December 14, 2021, I received information from San Mateo County Parks and Recreation Department that a PG&E Utility Line Vegetation Management contractor utilized a Heli-saw to clear vegetation along the Monta Vista Transmission line in Wunderlich Park above Woodside. I inspected that area on Wednesday December 15, 2021, and observed evidence of a Heli-saw operation (see photos below). From discussions with Davey Resources personnel on the site, they confirmed that it had occurred the previous week on Thursday December 9, 2021. From discussion with Parks Staff, I was informed that Heli-Dunn was the helicopter contractor that PG&E was using.

At the site, I observed that this was a continuation of the Timber Operation that I observed in my previous NOV dated November 24, 2021, for this same location. I observed all the elements of Timberland (PRC 4426) and the elements of a Timber Operation (PRC 4427). As before, I cannot find any record of a Harvest document for this work in our CAL FIRE database. As determined before this would be an additional violation of PRC 4621 by PG&E and PRC 4481 by whomever was the contractor. If the contractor is not found to be a Licensed Timber Operator, this would be a violation of PRC 4471, operations without a Timber Operators License.

Even more concerning to me was the potential for public safety by this operation. I had discussed this project with County Parks staff earlier. They had been approached by PG&E for permission to conduct similar work on neighboring properties and use County Park property for a landing zone. The agreement had not been completed and Parks staff was not aware that this

operation was or had occurred. Furthermore, I was told by Hannah Ormshaw, Assistant Director of San Mateo County Parks, that PG&E had been specifically asked if the saw would be used to cut County Parks trees and was told no.

County Parks had staff on duty at the park while this was occurring, but they had no idea, nor did they know of any warnings issued to the public users of the park at that time. No trail or area closures had been placed or signs put out to keep the public out of the area, as would have been the case if the County knew about the operation.

During my inspection, I noted numerous 2" – 8" diameter branches that had been cut during the operation and allowed to fall from up to 150' above the ground by the Heli-saw. I observed several piles of these branches laying on or adjacent to the section of park road that I inspected. This is a concern that would have been raised and protection measures discussed if this had been covered by the required CAL FIRE harvest document if one had been applied for.



**Photo 083146.jpg taken 12-15-2021 by R. Sampson showing branches fallen during Heli-saw operation on well traveled park road and left blocking existing waterbar. Same section of road that I observed with wheel ruts from my previous NOV (11-24-2021) for operations during saturated soil conditions.**

Another concern raised by Parks Staff and one that I as a RPF share is the condition of the stand and redwoods following these operations. In addition to what stand, and fuel conditions will this technique create if this is the intended treatment technique planned to be repeated in the future. I observed (photo above) that multiple lateral branches (2" to 8" diameter) were severed between 2' and 6' out from the stem leaving long stubs that will likely die off. This is in addition to the slash that may or may not be treated in the stand and canopy. All of this in a County Park. This work also overlaps a CAL FIRE Governors Project fuel reduction project from 2019 and a current CAL FIRE funded Forest Health Grant project.

In addition to public safety concerns, I also noted that more than one pile of limbs had been dropped into waterbars on dirt park roads, effectively blocking the drainage feature from functioning. As a major storm came through the area over the weekend and early week that dropped over 5" of rain on this site, this slash rendered these waterbars ineffective during that major storm. This would be viewed as a violation of 14 CCR § 914.6(f), waterbars with clogged outlets.

Due to these violations, I must inform you that continued Timber Operations without the appropriate permits or continued violations of the operational sections of the Forest Practice Rules and State Fire Rules could result in charges being filed with the District Attorney or Civil action by the department. Furthermore, each day operations continue can be considered an additional count of each violation. I must also remind you that violations per PRC § 4601 and 4602 are considered misdemeanors and can be processed either criminally or civilly with penalties up to \$10,000 per count.



Photo 083217.jpg taken 12-15-2021 by R. Sampson showing redwood tree after Heli-saw operation that occurred on 12-9-2021. Note size and length of branch stubs left.

If you have any questions about these matters, you may contact me at the address below.



Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Sampson".

Richard Sampson, RPF #2422  
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