Exhibit D

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THOMPSON
WILDLAND MANAGEMENT
Environmental Management & Conservation Services
International Society of Arboriculture Certified Arborist # WE-7468A
Department of Pesticide Regulation Qualified Applicator Lic. #QL50949 B
Environmental & Arborist Assessments, Protection, Restoration, Monitoring & Reporting
Wildland Fire Property Protection, Fuel Reduction & Vegetation Management
Invasive Weed Control, and Habitat Restoration & Management
Soil Erosion & Sedimentation Control
Resource Ecologist

August 14, 2024

Ms. Tracy Piazza
58 Mt. Devon Road
Carmel, CA. 93923
APN: 241-142-002
Project File # PLN230339

Subject: 58 Mt. Devon Road Non-Permitted Tree Removal Assessment

Per *Monterey County Housing & Community Development Department-Planning Services* requirements, the purpose of this report is to document that six (6) native specie Monterey pine (*Pinus radiata*) trees located on the south parcel at 58 Mt. Devon Road in the Carmel Highlands (APN: 241-142-002) were removed without a Monterey County tree removal permit. Consequently, the County has issued a citation (Project File # PLN230339) requiring that this non-permitted tree removal be documented, evaluated and properly mitigated. Findings and recommendations are provided herein:

In regards to exhibits and photographs included in this report, refer to the attached *Exhibit A: Tree Removal Location Map* that shows the location of the 6 subject pine trees identified as *Tree#s 1-6*, as well as the attached photos located at the end of the report (i.e., *Figures 1-10*) that depict property features and characteristics, and the remaining stumps and stems of the 6 pines that were removed.

The subject property in the Carmel Highlands (i.e., the south parcel) is accessed by a unpaved gravel driveway that leads to a relatively small structure (refer to attached photos, *Figures 2, 9 & 10*). The lot is located in a mixed woodland *wildland-urban interface* (WUI) community that is dominated by mature and aging upper-canopy Monterey pines (*Pinus radiata*) and mid- to lower-canopy coast live oaks (*Quercus agrifolia*; refer to *Figures 1-10*). Lower growing understory vegetation is primarily composed of a variety of native coastal scrub type vegetation and non-native invasive plants (e.g., exotic annual grasses and broadleaf noxious weeds, such as French broom, acacia, jubata grass, Italian thistle, pittosporum and eucalyptus, among other non-native

plant species). It should be noted that several of pines occurring on the subject property and in the surrounding woodland (WUI) areas are overly-mature and senescing trees that are exhibiting signs and symptoms of declining physiological health and structural condition.

The non-permitted removal of six (6) Monterey pine trees (identified as *Tree#s 1-6*; refer to *Figures 2-7*) located on the south parcel was evidently done to address hazard concerns that the property owner had due to the apparent declining health and condition of the subject trees. Additionally, tree removal was also performed to assist with fuel reduction and vegetation management activities that the property owner wanted completed for the purpose of reducing unnaturally high combustible fuel loads and mitigating wildland fire hazards, as well as to comply with California State *PRC 4291* and homeowners insurance industry standards in WUI areas, which requires fuel reduction to a minimum of 100 feet around occupied structures to assist in reducing hazardous fuel loads and providing adequate defensible space in the event of an approaching wildland fire (refer to the attached *Exhibit A: Tree Removal Location Map* and photos located at the end of the report [*Figures 1-10*]). Fuel reduction operations involved the above mentioned tree removal, as well as the thinning and removal of dense and overgrown understory vegetation (i.e., ladder fuels) that consist of a variety of native and exotic vegetation and highly combustible dead and unhealthy woody material. Other than tree removal, protected special status flora and fauna do not appear to have been affected by tree removal and fuel reduction operations.

Currently, the only evidence available as to the approximate size and general condition of the 6 pine trees that were removed are the remaining stumps and stems/snags (refer to *Figures 2-7*). Per the assessment, the 6 subject pines were greater than 6 inch DBH and less than 24 inch DBH at the time of removal; however, accurately determining the health and condition of the trees at the time of removal based on the current condition of the stems/snags (*Tree#s 1 & 2*) and stumps (*Tree#s 3-6*) is a difficult task. Per the condition of the remaining stumps and stems, there is no clear and conclusive evidence that the trees were dead, dying and/or structurally compromised at the time of removal, so unless there is photographic evidence proving otherwise, the assumption is that the subject pine trees were alive, but not necessarily healthy, at the time of removal.

It should be noted that the remaining stumps have some wood rot and decay, which indicates that they may have been significantly declining, or perhaps dead, and/or structurally unsound and compromised at the time of removal; however, there is not enough wood decay and deterioration to conclusively say that the 6 subject pines were dead, significantly declining and/or structurally unsound when they were removed. While, based on the current evidence available, it can not be concluded that the subject pine trees were dead and hazardous at the time of removal, in my professional opinion, it is likely that these 6 pines were in declining health and condition when they were

removed, which is based on the current condition of the remaining 2 stems/snags (*Tree#s 1 & 2*; refer to *Figures 2 & 3*) and 4 stumps (*Tree#s 3-6*; refer to *Figures 4-7*).

It should also be noted that a 8 inch oak stump identified on the *Exhibit A: Tree Removal Location Map* (located near the pine stem/snag identified as *Tree#1*) is actually less than 6 inches diameter, so no tree removal permit was required and the removal of this oak is not considered a violation (refer to *Figure 8*).

In conclusion, the property owner decided to remove the 6 Monterey pine trees of concern (refer to the attached *Exhibit A: Tree Removal Location Map* and photos, *Figures 2-7*) as a preventative action to address and mitigate hazard concerns they felt the subject trees presented. Regardless of the health and condition of the 6 subject trees at the time of removal, as well as the current condition of the remaining stumps and stems, a tree removal permit should have been obtained prior to tree removal activities occurring, which the property owner recognizes was a mistake.

As a result of tree removal activities, it will be necessary to plant six (6) 5 to 15-gallon Monterey pine seedlings or saplings (a 1:1 replacement ratio) in order to mitigate impacts of non-permitted tree removal and to satisfy Monterey County tree removal permit requirements. The 6 replacement plantings shall be planted in suitable and appropriate locations on the subject parcel (there are several suitable planting locations to choose from) using proper tree planting methods and best management practices (BMP's). Additionally, these 6 Monterey pine replacement plantings shall be properly cared for and maintained to assist in healthy establishment and maturation, and will be required to survive a 1-year monitoring period to satisfy Monterey County tree removal permit conditions.

Best regards,

Rob Thompson *8-14-24*
ISA Certified Arborist # WE-7468A Date
Resource Ecologist

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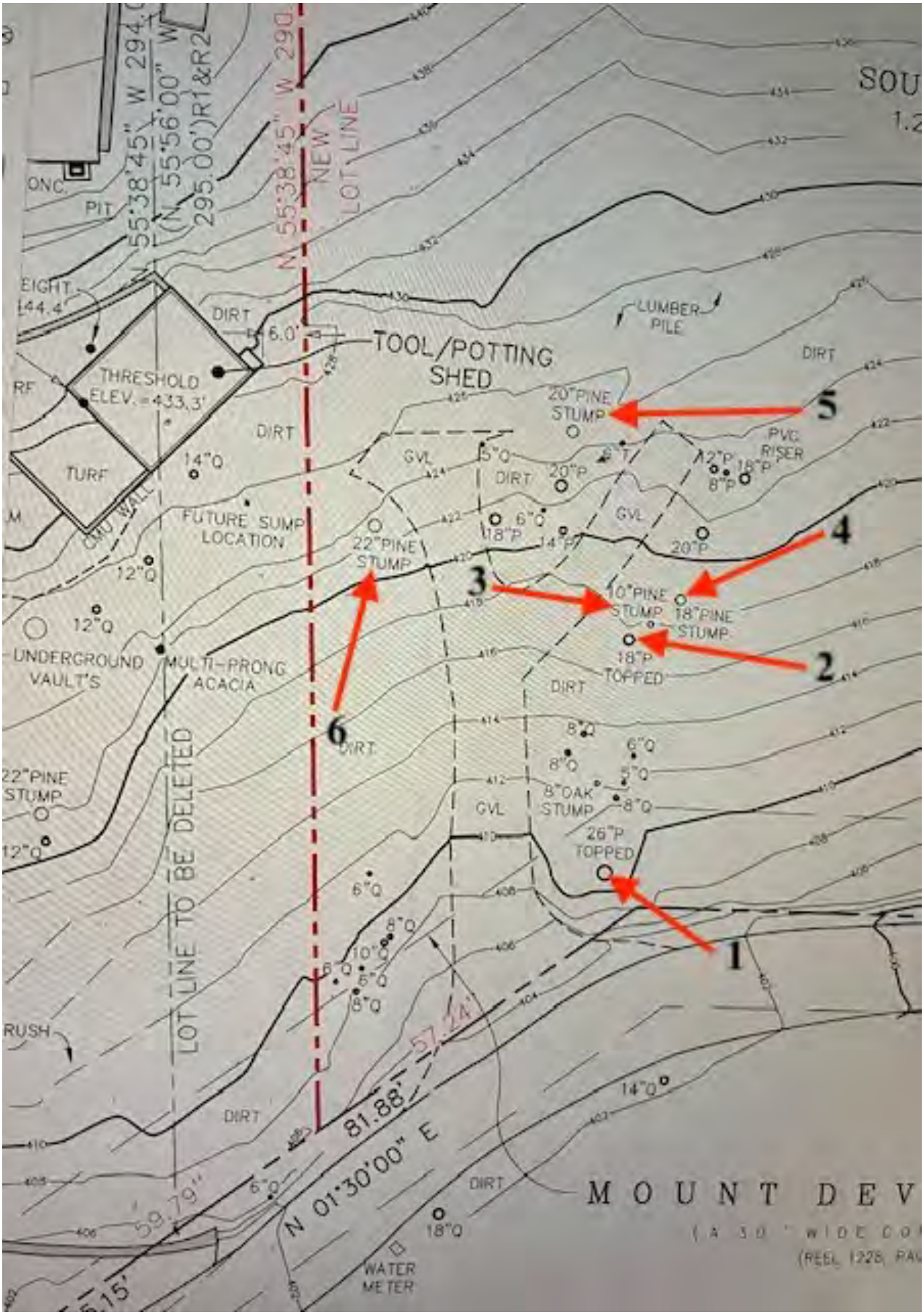

Exhibit A: Tree Removal Location Map shows the location of 6 mature and aging Monterey pine trees (identified as Tree#s 1-6) that were removed from the south parcel without a County tree removal permit.

Figure 1. View of mixed pine and oak woodland south parcel from Mt. Devon Road.

Figure 2. Unpaved entrance to the south parcel. The pine stem/snag identified as Tree#1 is near right edge of photo.

Figure 3. The other pine stem/snag identified as Tree#2 that was removed without a permit is in center of photo and is surrounded by non-native invasive French broom.

Figure 4. Pine stump identified as Tree#3 was removed without a permit.

Figure 5. Pine stump identified as Tree#4 was removed without a permit.

Figure 6. Pine stump identified as Tree#5 was removed without a permit.

Figure 7. Pine stump identified as Tree#6 was removed without a permit.

Figure 8. Oak stump identified on the parcel map and tree removal map is less than 6 inch diameter and no tree removal permit or mitigation planting is required.

Figure 9. Unpaved gravel entrance to south parcel is surrounded by an abundance of non-native invasive French broom and acacia.

Figure 10. Structure is located at top of unpaved entrance. The main house and residence is barely visible in the background.