



September 19, 2017

Ms. Flora Li  
ToHigh Investment  
88 First Street, 6<sup>th</sup> Floor  
San Francisco, CA 94105

RE: James MacNair- Response to VOTMA Appeal Issues

Dear Ms. Li,

Following is my response to the issues raised in the VOTMA appeal of the Planning Commission Approval. Dated 8/14/17.

**E. The County Must Provide Adequate Analysis and Information Regarding the Proposed Tree Removal Necessary for the Project**

*The Addendum claims that “approximately 17 percent fewer trees would be removed with the proposed project, including seven large specimen oaks,” but fails to provide the public and decision makers with the information needed to make an informed decision. Staff Report, Exhibit E. An SEIR is needed to determine the visual and aesthetic impacts of the new tree removal plan due to the changes to the Project layout and design.*

**Response:** The project has been extensively studied that includes the inventory of all trees within the project areas, as well as trees important for screening the views from the critical view points along Highway 12. The inventory and survey data is available for review, and the extent of the collected data was presented in the October 13, 2016, Arborist Report and the design exhibits showing tree removals and preserved trees. All of the trees included in the inventory have been identified and tagged with individual tree numbers. The construction impact on trees has been evaluated and documented.

*Understanding the potential impacts of tree removal is especially important along the western ridge where the western cottages have been relocated. The potential for tree removal and thinning to affect the views of those cottages from Highway 12 and elsewhere increases drastically with their relocation to a ridgeline. The changes to the western cottage design will cause trees in the old parking area to be removed, as well as trees to the south where the larger cottages are located. These trees that will now be removed seem to have shielded the original design from view. The removal of those trees under the new layout may significantly impact the view of the Resort and degrade the aesthetics of the area. While the Staff Report claims the visual impact of each cottage will be either equal to or less than the visual impact considered in the 2004 EIR, it does not appear to take into account the specific trees to be removed and the impact that*

*will have on each view. Staff Report, Exhibit Q, Exhibit P-2. Visual depictions of each of the relocated cottages, is essential to informed decision making and must be included in an SEIR.*

**Response:** The visual impacts of the western cottages has been thoroughly studied by Donald MacNair and the project architect. Visual analyses have been performed at various locations along Highway 12. This visual analysis demonstrates compliance and consistency with the findings in the FEIR. VOTMA does not seem to realize the number of screening trees that are present outside the project limits. The tree removals that which VOTMA is expressing concern are in the footprints and grading limits of the structures, parking lots, and circulation pathways, and are not necessary to provide screening. The retained trees are outside these construction limits and will provide the screening depicted in the visual analyses.

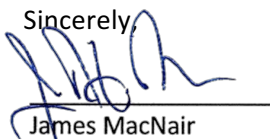
The comment regarding the potential degradation of the aesthetics of the area due to tree removal is ill-informed. The primary goal of woodland management is to enhance and improve the quality of the woodland by reducing overcrowding of trees and improving cultural conditions including pest and disease control. This woodland will benefit and improve in health under the active management provided by the development of the property.

*Lastly, the Addendum fails to address the requirement identified in the Draft EIR that “thinning of tree canopies and selective tree removal is required for up to 150 feet from structures” to accommodate emergency services. The Staff Report seems to show numerous trees well within 150 feet of a structure. Staff Report, Exhibits E and F. Since those trees that are within 150 feet of a structure may need to be removed for emergency services purposes, those trees should be identified in an SEIR to allow the public and decision makers to take that loss into account when making an informed decision regarding visibility and Project aesthetics.*

**Response:** As stated in the October 13, 2016 Arborist Report the “Vegetation Management Plan addressing wildland fire safety prepared in 2003 was deemed compliant by the Sonoma County Fire Marshall and Kenwood Fire Chief, with no changes required. This plan will focus on removal of dead or declining trees and reducing ground and ladder fuels. Oaks in acceptable condition will be retained, as well as other healthy trees that are not overcrowded”. The goal of the VMP is to retain healthy trees with special focus on preserving screening trees while reducing wildfire risk to the resort and neighboring properties. The current design does not increase the nature or amount of fire safety protection from that anticipated with the conceptual design. This work will not significantly increase the visibility of the project and will improve the aesthetics of the property.

Please contact me with any questions, or if additional information is required.

Sincerely,



James MacNair

International Society of Arboriculture Certified Arborist WE-0603A  
ISA Qualified Tree Risk Assessor