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Exhibit D

July 31, 2025

To: Michael Stoltey - MD3 Investments, 893 Marsh Street, San Luis Obispo, CA 93401

Mr. Stoltey,

Per your request, the following memo is an update of recommendations regarding two (2) native oaks at your Ardmore Project located at 2930 Union Road, in Paso Robles, California.

You recently communicated to me that your intended use of the property located at 2930 Union Road, in the city of Paso Robles has changed from light industrial to residential.

You have asked me to review the oak impact and tree protection report I prepared for you on October 19, 2022 and update my recommendations regarding Tree 3 due to its failure and Tree #13 based on the new intended use of the property. Further, you have requested that oak mitigation calculations be updated to be consistent with the new assessments and recommendations.

Tree Assessment Updates

Since my original report was submitted to you in October of 2022, Tree #3 has failed to internal decay and root rot that affected its structural integrity. In my original report, I noted that the tree had several decay cavities throughout the trunk as well as in one scaffold branch. My recommendation at the time was for the tree's removal. Now that the tree has failed, this tree should be eliminated from the survey. The failed tree should not count toward the oak tree mitigation replacement calculation since it is no longer alive or standing. See Appendix A- Photographs – Photo 7.

Review of data from the original assessment of Tree 13:

I performed an advanced inspection of the tree's trunk integrity by employing the use of a Resistograph wood density measurement tool. The device measures the density of live wood and detects voids in the tree that are caused by decay.

I took 4 measurements of the wood density of the trunk at 3.5' above ground and 1 measurement at approximately 1' above ground. See below.

- *Sample 1 – west side of tree. Outer shell thickness was 7"*
- *Sample 2 – south side of tree. Outer shell thickness was 8.5"*
- *Sample 3 – east side of tree. Outer shell thickness was 8.5"*
- *Sample 4 – east side of tree at scarred area on east side of trunk approximately 1' above ground. Outer shell thickness was 12".*
- *Sample 5 – north side of tree. Outer shell thickness was 5".*

The tree had a diameter of 42 inches. The outer shell, live wood thickness of the trunk measured by the Resistograph showed a substantial loss of internal wood that provides structure to the tree. Sample 5 was the thinnest sample measured at 3.5' above ground.

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At this location there was an approximate 77% radial loss of wood. Samples 2 and 3 were the thickest samples measured at 3.5' above ground, at these locations there was an approximate 60% radial loss of wood. Essentially all that is left of the trunk is a hollow tube that is supporting multiple tons of canopy weight.

As the decay continues, the wood will lose more structural integrity. Combined with forces from high wind events during winter storms, the tree will be even more likely to fail.

In my report dated October 19, 2022, I concluded through a tree risk assessment, that the risk of Tree #13 failing at the trunk due to advanced internal decay was HIGH.

When the project was planned for light industrial, I asserted that the only way I felt comfortable recommending retention of the tree was to restrict access by installing a permanent fence around the tree at the limits of a tree protection zone. The idea was that once access was restricted, the risk rating could be reduced to Moderate.

Through negotiations with the city planning department, your team agreed that the tree would be retained, but only if a permanent fence were built at the limits of a tree protection zone to restrict access.

Furthermore, no buildings were to be constructed within the strike zone in the event the tree were to fail at the trunk.

The reason for the restriction was to protect people from being in the strike zone of the tree if it were to fail.

The use of light industrial, likely gives access to the property and the tree for approximately 12 hours per day. The conversion of this property to residential will raise the potential access to the tree to 24 hours per day. People and especially young people are attracted to trees for shade and for recreation. Although a fence could be built around the tree, I am not convinced the access would be restricted to a level high enough to protect the occupants of the proposed residential community.

I recommend to the City of Paso Robles planning department that Tree 13 be removed based on the risk of it failing and potentially severely injuring residents of the development.

See Appendix A Photographs – Photos 1-7 for photos of Tree 13 and for comparison, Trees 2 and 3. Tree 2 had significant internal decay similar to Tree 13 and was approved for removal by the City Council due to internal decay and risk of failure as part of your original oak tree removal permit. Tree 3, addressed earlier in this memo, failed due to internal decay and root rot. This is an example of what to expect as Tree 13 continues to decay.

Mitigation Tree Replacement Updates

In light of the changes of use for this project and the failure of one tree, I have updated oak the tree mitigation calculations. As a review, I have included the City's mitigation requirements below.

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The City of Paso Robles requires replacements for any native oak removed that is 6-inches in diameter or greater. This requirement is at the discretion of the Director of Public Works. The following is excerpted from the city's Oak Tree Ordinance 835 N.S.:

Replacement oaks being equivalent to twenty-five percent of the diameter of the removed tree(s). (For example, the replacement requirement for removal of two trees of fifteen-inch DBH (thirty total diameter inches), would be seven and one-half inches (thirty inches removed multiplied by twenty-five hundredths replacement factor).

This requirement could be satisfied by planting five, one and one-half inch caliper trees, or three, two-and one-half-inch caliper trees or any other combination totaling seven and one-half inches). A minimum of two, twenty-four-inch box, one and one-half inch minimum trunk caliper measurement trees shall be required for each oak tree removed.

Replacement trees shall be located on the same property as where the tree is approved for removal or, subject to approval of the director, arrangements can be made to locate the replacement trees on public property. Planting standards for replacement trees shall be consistent with City Standard Details and Specification L-4 except that deep root barriers shall not be required if the trees are not adjacent to sidewalk areas. Oak tree preservation and maintenance measures shall be consistent with the provisions of this chapter.

The combined diameter of the oak trees proposed for removal within your project is 265 inches. Twenty-five percent of 265 inches is 67 inches. Therefore thirty-four (34) native oaks at 2-inch caliper would be required to be planted on the premises or somewhere in the city if approved by the Public Works Director's. See table below for replacement calculations.

Tree #	DBH	Recommendation
Tree 1	43"	Remove
Tree 2	47"	Remove
Tree 3	47"	Dead (not included in calcs.)
Tree 4	52"	Remove
Tree 9	51"	Remove
Tree 10	51"	Retain and Protect
Tree 11	30"	Remove
Tree 13	42"	Remove
Total inches proposed for removal	265"	
25% of 265"	67"	
Tree replacements @ 2" caliper	34	

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Please feel free to contact me with any questions.
Thank you,

Rodney D. Thurman – Owner

ISA Board Certified Master Arborist PN-2684BUM
ISA Tree Risk Assessors Qualification

Appendices: Photographs

Appendix A – Photographs



Photo 1 – Tree 13 with view to northeast. Outwardly, the tree appears to be healthy but internal rot makes it structurally unstable.

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Photo 2 – Tree 13 with root decay cavity on south side of tree indicated by arrow.

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Photo 3 – Tree 13 with bulging root-crown indicating possible butt-rot.

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Photo 4 – Tree 2 in 2022. Outwardly, the tree appears to be healthy but internal rot makes it structurally unstable.

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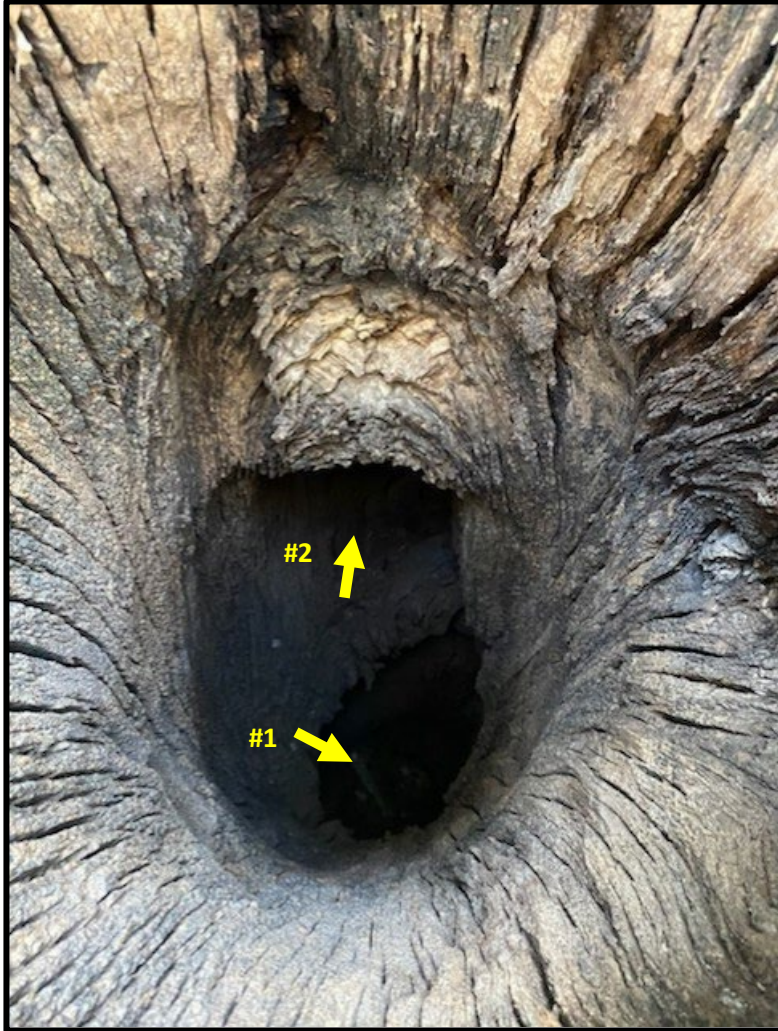


Photo 5 – Tree 2 in 2022. View of interior decay cavity formed by failed scaffold. Arrow 1 shows depth of cavity down to roots of tree. Arrow 2 shows decay that has advanced into eastern scaffold branch. The tree has high potential to fail due to internal decay.

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Photo 6 – Tree 3 in 2022. Outwardly, the tree appears to be moderately healthy but internal rot made it structurally unstable.

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Photo 7 – Tree 3 – July 2025. The tree has died due to root rot and failed because of internal decay and root rot.