

Received

SEP 16 2026

City of Sebastopol
Admin Services - Finance

Thomas R. Boag

September 15, 2026

John Jay, Associate Planner
Contact for Design Review Board/Tree Board
City of Sebastopol Planning Department
7120 Bodega Avenue
Sebastopol, CA 95472

Sent via email and U.S. Mail

Re: Written Comments for the Design Review/Tree Board — Tree Removal Permit, Grupe Investment Company / 8100 Valentine Avenue Housing Project ("Valentine Avenue Homes")

Dear Mr. Jay:

I am writing to submit written comments regarding the Tree Removal Permit application for the above-referenced project, for the Design Review/Tree Board's consideration at its September 22, 2026, meeting.

Below please find "Questions for the Sebastopol Tree Board," which sets out several specific, unresolved questions concerning the application's compliance with the City's tree ordinance. My principal concern is that the Project's Updated Project Description (filed March 3, 2026) states that "[t]ree replacement requirements will be addressed during construction drawings," while Sebastopol Municipal Code Section 8.12.060(E) requires the Tree Board itself — not a later, non-public administrative phase — to determine the final number and species of replacement trees, related to the significance of the trees proposed for removal.

I have also found that the Tree Removal Permit Application as filed leaves the fields for individual tree data (species, diameter, location, and proposed replacement) blank, referring instead to the arborist inventory report, which documents tree condition rather than replacement mitigation.

I respectfully request that this letter and the enclosed questions be included in the Board's meeting packet and made part of the administrative record for this application, and that the Board decline to approve the Tree Removal Permit until the application specifies enforceable replacement-tree and tree-protection terms consistent with SMC 8.12.060(E) and SMC 8.12.050.

Thank you for your attention to this matter. Please feel free to contact me with any questions, and please confirm receipt of this letter.

Sincerely,



Thomas R. (Tom) Boag

Questions for the Sebastopol Tree Board

Tree Removal Permit — 8100 Valentine Ave ("Valentine Avenue Homes," Grupe Investment Co.) focus: impacts on the retained north-side redwood grove

Deferred replacement mitigation — a threshold problem

- The applicant's own Project Description states, under Entitlement Requests/Applications, item 5 (Tree Removal Permit): "Tree replacement requirements will be addressed during construction drawings." But SMC 8.12.060(E) requires the *Tree Board itself* to determine the final number and species of replacement trees, related to the significance of the trees removed, as a condition of the permit. How can the Board make that finding tonight if it isn't in the application?
- The filed Tree Removal Permit Application leaves the real-tree rows (species, diameter, reason, proposed replacement) blank, directing reviewers instead to "see arborist inventory report" — which documents tree condition, not proposed replacement species/counts. Is the application complete as submitted under SMC 8.12.060's application-content requirement?
- The Meserve arborist report includes a detailed "Tree Preservation Guidelines" specification (protection zones, fencing, root-cutting protocol, monitoring) — but it never mentions the performance bond (\$1,500 per protected tree) that SMC 8.12.050 requires, and it is silent on replacement species/count for the trees approved for removal. Does the city consider this specification a formally adopted Tree Protection Plan under SMC 8.12.050, and has the required bond been posted?
- If mitigation is deferred to "construction drawings," what public process exists at that stage — given it is typically an administrative, staff-level review with no Tree Board hearing or neighbor notice?

Project alternative: Building 25 sits on a protected redwood

- Sheet C2.0 of the Vesting Tentative Map shows Lot 13 / Building 25 as the only unit in the entire 39-home project not paired with an ADU. The plan draws that building's own footprint directly over the trunk location of tag t28 (tree #128), a 34-inch protected redwood — which is listed on the same sheet's "Protected Trees to Be Removed" schedule. A second protected redwood, tag t30 (#130), is marked for removal just a few feet off Building 25's corner.
- Will the Tree Board ask the applicant to evaluate eliminating or relocating Building 25 — the project's lowest-yield, non-ADU unit — as a project alternative that could retain tree #128 (and possibly #130), before approving removal of these protected trees?

Other buildings sited close to retained trees

- Building 25 is not the only place this concern arises. The Meserve report's own Tree Location Plan shows several other retained, protected redwoods — trees #24, #25, #26, #27, and #32 — positioned immediately adjacent to Building 24, Building 27, and Building 28 in the Lot 12–15 cluster, with canopy driplines that appear to reach very close to those building

footprints.

- Has the applicant verified, building-by-building and not solely for Building 25, that no foundation, wall, or grading limit intrudes on the tree protection zone of any retained protected tree across the whole site, and can that verification be provided in writing and made part of the record before permits issue?

Is dripline an adequate protection-zone standard for this grove?

- The Meserve report defines the tree protection zone as the canopy dripline itself, and SMC 8.12.050 likewise conditions the Tree Protection Plan on work located “within the dripline,” without independently specifying a numeric protection radius — leaving the exact boundary to the discretion of the project arborist.
- Under widely used arborist practice, the protection radius for a mature or sensitive tree is often calculated from trunk diameter (DBH) rather than canopy edge alone — commonly 1 to 1.5 feet of radius per inch of DBH — and dripline is considered an adequate proxy mainly for trees growing in an open setting. Dripline is specifically flagged as inadequate for trees in a forest or grove setting, older specimens, or trees with a small crown relative to trunk size. The retained redwoods here are a closely spaced, mature grove — arguably exactly the condition where dripline can understate the true root zone.
- The report’s own figures reinforce the concern: nearly every redwood on site — with trunk diameters ranging from 15 to 44 inches — is assigned the same 16-foot canopy radius and the same 70-foot height, suggesting these are rounded, categorical field estimates rather than individually measured values. Will the Tree Board ask the applicant’s arborist to confirm whether the 16-foot dripline figure was individually verified for each retained tree, and to justify why dripline — rather than a diameter-based protection radius — is adequate for this particular grove?
- The inventory report does include a per-tree “Height (± feet)” column, so a height table exists — but given it repeats the same rounded figure for most redwoods, would the Board find it useful to request more precise, individually verified height and canopy-radius measurements before relying on them to fix protection-zone boundaries?

Root grafting & adjacency

- Were trees 23, 28–31, and 41 checked for root grafts to their retained neighbors (20–22, 24–27, 40)? If grafts exist, what cutting protocol will be used?

Wind exposure at new gaps

- Has wind-exposure change been modeled for retained trees newly facing an open gap (20–22, 24–27)? Are wind-firming measures required, or is fencing/mulch alone deemed sufficient?

Construction protection adequacy

- How will excavation of the removed trees’ stumps/roots avoid crossing into the adjacent retained trees’ Tree Protection Zones, given the tight spacing?
- Who verifies dripline fencing is correctly placed before grading, and what happens if it’s found missing or moved?

- How is the required hand-cut (not ripped) standard for roots >2" actually enforced during construction, not just specified on paper?

Monitoring & enforcement

- Which retained redwoods trigger the >20% protection-zone-disturbance threshold requiring monthly arborist monitoring, and will those reports be filed publicly with the city?
- If monitoring shows a retained tree declining after construction begins, is there a defined remediation plan, or does it default to a new permit process?

Mitigation & replacement

- What mitigation (fee and/or replacement plantings) applies to the six mature 30"+ trees proposed for removal, given their size and age?
- Is a bond held by the city guaranteeing the retained redwoods' health post-construction, and what triggers forfeiture if one dies?

Process & independent review

- Since the arborist was retained and paid by the applicant, will the city commission an independent arborist review before this permit is approved?
- Given the report is now many months old, will a re-inspection of tree health and grading plans be required before permits issue?

Source: Grupe Valentine Avenue Tree Inventory Report (Dec. 5, 2025, John C. Meserve, Horticultural Associates); Building/Lot numbering and protected-tree removal schedule from Sheet C2.0 of the Vesting Tentative Map Package (Adobe Associates, Inc.); Tree Removal Permit criteria under Sebastopol Municipal Code Ch. 8.12, esp. SMC 8.12.060(E) replacement-tree findings and SMC

8.12.050 Tree Protection Plan requirement; applicant deferral language from the Updated Project Description – Written Statement (March 3, 2026), Entitlement Requests/Applications §5; critical-root-zone / dripline-adequacy standards from North Carolina Urban Forest Council, "Tree Protection During Construction".