



COUNTY OF MENDOCINO
DEPARTMENT OF PLANNING AND BUILDING SERVICES
860 NORTH BUSH STREET • UKIAH • CALIFORNIA • 95482
120 WEST FIR STREET • FORT BRAGG • CALIFORNIA • 95437

JULIA KROG, DIRECTOR
PHONE: 707-234-6650
FAX: 707-463-5709
FB PHONE: 707-964-5379
FB FAX: 707-961-2427
pbs@mendocinocounty.org
www.mendocinocounty.org/pbs

MEMORANDUM

DATE: MAY 12, 2022
TO: COASTAL PERMIT ADMINISTRATOR
FROM: JULIANA CHERRY, PLANNER III
SUBJECT: CDP 2021-0027 CLARIFICATIONS & REVISED CONDITIONS

BACKGROUND: On May 5, 2022, staff and the applicant met to discuss the recommendations published in the May 2022 Staff Report for CDP 2021-0027. Additionally, a revised and updated *Tree Inventory and Exhibit* was filed on May 9; it supersedes Staff Report Attachment E. (In the report Attachment E was often referred to as "ETGIS Web Map," especially on pages CPA-4 through CPA-7.)

With the advent of a revised and updated *Exhibit E. Tree Inventory and Exhibit* (See attached), minor clarifications regarding the scope of the project are needed. For example:

- Trimming the tree canopy is not proposed.
- Tree stumps will be removed and stumps will be cut at grade or ground to just below grade, but the root should will remain. When the work is completed, tree stumps should not protrude above the ground.
- Offering a one-for-one replacement of felled trees update: PG&E staff are diligently working to confirm a site in Elk that would accept funds intended for planting replacement vegetation.

The revised proposal retains several trees that were previously tagged to be felled, including trees 11 through 29, and as identified in *Exhibit E*. Tree roots will be left in place.

SUMMARY OF CLARIFICATIONS:

A. Staff Report Table 3 could have identified the General Plan and Zoning District for APN 127-232-27. This property is owned by the Greenwood Homeowners Association (See page CPA-4). The general plan classification and zoning district are coastal *Open Space*.

B. As the applicant does not propose trimming existing trees, the report incorrectly stated trees on APN 127-232-16 would be trimmed, including trees identified as 11, 13, 14, 18, 23, and 26. Tree 85 on APN 127-150-21 will be removed (and not trimmed). For clarification the following information should be stricken from Staff Report page CPA-4, as shown in bold and ~~crossed-out~~.

Parcel APN 127-232-16 and no development. Land west of the substation fence is owned by Phillip Kay (APN 127-232-16) and is in the coastal Rural Village District. On this parcel, the size of the trees proposed to be removed ~~or trimmed~~ does not meet the definition of *Major Vegetation Removal*. ETGIS Web Map, prepared by the applicant, is an aerial image with notes identifying the location of the trees intended to be removed ~~or trimmed~~ (See Exhibit E). Trees numbered 2-10, 31 and 77, generally, are associated with APN 127-232-16. ~~Of these trees, six will be trimmed (i.e., trees 11, 13, 14, 18, 23, and 26).~~ Eleven trees would be removed (i.e., trees 2, 3, 4, 5, 6, 7, 8, 9, 10, 31 and 77); these trees include Mock Oranges (trees 2-10, 31 and 77) and two Douglas Firs (trees 31 and 77). None of the surveyed trees have diameters exceeding 12 inches, which is a characteristic of *Major Vegetation Removal*. While ~~trees will be trimmed and~~ eleven trees would be removed from parcel APN 127-232-16, the activity does not rise to the definition of development and, in this instance, a Coastal Development Permit is not required to remove ~~or trim~~ these trees.

Parcel APN 127-150-01 and Major Vegetation Removal: Land east of the substation fence is owned by Richard Mitchell (APN 127-150-01) and is in the coastal Range Lands District. The previously mentioned ETGIS Web Map and the applicant's "Elk Substation Tree Inventory" identify the location, variety, quantity and girth of the trees to be removed (**See Exhibit E**). Eight of the trees proposed to be removed are on APN 127-150-01 and each tree's girth exceeds the 12-inch diameter which is a characteristic of *Major Vegetation Removal*. The eight Douglas Firs are inventoried as numbers 78-85, three trees have 14-inch diameter at breast height (DBH), two are 16-inch DBH, two are 18-inch DBH, and one is 20-inch DBH. (~~One tree would be trimmed, #85; this tree is closest to the north side of Philo Greenwood Road~~). On this parcel, the activity meets the definition of development.

C. Additionally, the one tree associated with parcel APN 127-232-27 will be removed. This is tree 1, a 22-inch DBH Douglas Fir (see Exhibit E). This property is owned by Greenwood Homeowners Association.

D. Additional **ENVIRONMENTAL DETERMINATION**. The applicant suggests including a Class 4 categorical exemption from the California Environmental Quality Act, or CEQA, in addition to a Class 1(b) and Class 2(c). The project meets the criteria for a Categorical Exemption from the CEQA under a Class 4(i), Section 15304; which includes fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. This exemption shall apply to fuel management activities within 100 feet of a structure if the public agency having fire protection responsibility for the area has determined that 100 feet of fuel clearance is required due to extra hazardous fire conditions (see also Staff Report page CPA-6 and recommended Finding 4, page CPA-7).

RECOMMENDATION:

The Coastal Permit Administrator include a Class 4(i) categorical exemption from CEQA; approve CDP 2021-0027 as revised and include the following clarifications to the May 2022 published Conditions #11 and #12. Staff does not recommend adopting Condition #13. As follows:

#11. **The applicant shall partner with a local community agency, such as the Elk Community Service District or Greenwood Homeowners Association, and provide funding for a 1:1 tree replacement at an off-site location, which would provide a community benefit in preserving the forested areas near Elk, an unincorporated community in Mendocino County. The applicant shall partner with Save the Redwoods League by providing funding to treat five acres of forest land restoration, as part of the "Cape Vizcaino Forest Restoration Project."**

#12. The applicant is authorized to fell and remove sixty-six (66) trees ~~and remove associated tree stumps~~. **Subject to the on-site review and approval by the Coastal Permit Administrator or their designee, the stumps will be ground (at or below grade level) and the roots may remain.** The applicant may chip the vegetation, and distribute the chip onsite or distribute it to the coastal Mendocino County community.

#13. [Delete.] ~~When trees are removed, the applicant shall remove tree stumps and root balls. During the effective period of this permit, the landowners may plant low stature, regionally native plants within the effected 36,655 square foot area (approximate) and provide for irrigation, or hand watering, during the five years after planting (or until the plants are established).~~

ATTACHMENTS:

- A. Revised Project Findings and Revised Conditions of Approval
- B. Updated Staff Report Attachment E. *Tree Inventory and Exhibit dated May 9, 2022*

**REVISED PROJECT FINDINGS AND
REVISED CONDITIONS OF APPROVAL
MAY 12, 2022**

nb. Recommended clarifications are underlined and condition #13, which is no longer recommended is **crossed out**.

Pursuant to the provisions of Chapter 20.532 and Chapter 20.536 of the Mendocino County Coastal Zoning Code, the Coastal Permit Administrator approves CDP_2021-0027 and a request to trim or remove vegetation within an approximate 36,655-square-foot area. Sixty-six trees will be removed. The project site is located at 35720 Philo Greenwood Road (APN 127-232-12) and includes four adjoining parcels in Elk: APN 127-232-16 and -27; 127-220-30; and 127-150-01.

REVISED FINDINGS:

1. Pursuant with MCC Section 20.532.095(A)(1), *Major vegetation removal*, a defined type of development, is authorized by issuance of a coastal development permit and application CDP_2021-0027 conforms with the land use goals and policies of Mendocino County's certified local coastal program, including those goals specific to the community of Elk and described in Coastal Element Chapter 4.10; and
2. Pursuant with MCC Section 20.532.095(A)(2), the application has demonstrated that *Major vegetation removal*, as proposed, will not require use of utilities, access roads, and other necessary facilities; and conditions are recommended to reduce changes in site drainage while vegetation-removing equipment is on-site; and
3. Pursuant with MCC Section 20.532.095(A)(3), the proposed would not conflict with the purposes and intents of the Coastal Public and Semipublic Facilities District (PF), Coastal Open Space District, Coastal rural Residential District, Coastal Rural Village District, and Coastal Range Lands District, as well as all other provisions of Division II of Title 20 of the Mendocino County Code; and preserves the integrity of these Districts by continuing an existing use, that is conditionally permitted use in the PF District; and
4. Pursuant with MCC Section 20.532.095(A)(4), existing utility facilities used to provide electric power or public utility services, if completed in compliance with the conditions of approval, would not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act. The proposed improvements are Categorically Exempt pursuant to Sections 15304(i), 15301(b) and 15302(c); and
5. Pursuant with MCC Section 20.532.095(A)(5), the proposed would not have any adverse impact on any known archaeological or paleontological resources; on December 8, 2021, Mendocino County Archaeological Commission accepted a cultural survey report for the site; and Condition #8 is in place when archaeological sites or artifacts are discovered; and
6. Pursuant with MCC Section 20.532.095(A)(6), other public services, including but not limited to, solid waste and public roadway capacity have been considered; the PG&E site is currently developed as a power substation and does not include service connections to water or wastewater treatment (nor does it have an on-site well or on-site septic); and the project is not anticipated to affect demands on public services; and
7. Pursuant to MCC Section 20.532.095(B)(1), the proposed development conforms with public access and public recreation policies of Chapter 3 of the California Coastal Act and Coastal Element Chapter 3.6 of Mendocino County General Plan. Shoreline access is mapped contiguous with Philo-Greenwood

Road (CR 132), which adjoins the project site; and

8. Pursuant to MCC Section 20.532.100(A)(2) and as supported by comments received from the Agricultural Commissioner on November 10, 2021, removing trees will not conflict with the long-term protection of resources lands; and
9. Pursuant to MCC Section 20.532.100(B) and as portions of the project area are classified on the *Important Farmland* exhibit as "Grazing," in this instance removing vegetation to reduce risk of fire hazards will maximize the protection of environmentally sensitive habitat areas (as none will directly impacted); the project does not propose construction of new roads and other facilities; views from beaches, public trails, roads and view from public viewing areas, or other recreational areas should not be obscured by the proposed project; the proposed project will not diminish the rural character of the site, including the visual character of the community of Elk generally; *Major vegetation removal* will not conflict with the preservation of prime agricultural soils and will not hinder maintaining productive use of on-site or adjacent agricultural use of the lands; and
10. Pursuant to MCC Section 20.532.100(B)(2), no conversion of prime agricultural or Williamson Act Contracted Lands is proposed.

REVISED CONDITIONS OF APPROVAL:

1. This action shall become final on the 11th day following the decision unless an appeal is filed pursuant to Section 20.544.015 of the Mendocino County Coastal Zoning Code. The permit shall become effective after the ten working day appeal period to the Coastal Commission has expired and no appeal has been filed with the Coastal Commission. The permit shall expire and become null and void at the expiration of two years after the effective date except where construction and use of the property in reliance on such permit have been initiated prior to its expiration.
2. The use and occupancy of the premises shall be established and maintained in conformance with the provisions of Division II of Title 20 of the Mendocino County Code.
3. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.
4. This permit shall be subject to the securing of all necessary permits for the proposed development from County, State and Federal agencies having jurisdiction.
5. The property owners shall secure all required building permits for the proposed project, as required by the Building Inspection Division of the Department of Planning and Building Services. Any Building Permit application shall include this coastal development permit (printed on the plans submitted).
6. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:
 - a. The permit was obtained or extended by fraud.
 - b. One or more of the conditions upon which the permit was granted have been violated.
 - c. The use for which the permit was granted is conducted so as to be detrimental to the public health, welfare or safety, or to be a nuisance.
 - d. A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective or has enjoined or otherwise prohibited the enforcement or operation of one or more such conditions.

7. This permit is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.
8. If any archaeological sites or artifacts are discovered during site excavation or construction activities, the property owner shall cease and desist from all further excavation and disturbances within one hundred (100) feet of the discovery and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.
9. In compliance with MCC Section 20.504.035, exterior lighting shall be kept to the minimum necessary for safety and security purposes and shall be downcast and shielded, and shall be positioned in a manner that will not shine light or allow light glare to extend beyond the boundaries of the parcel. Prior to issuance of a Building Permit, the property owner shall furnish exterior lighting details to the satisfaction of the Coastal Permit Administrator.
10. In accordance with MCC Section 20.496.020(A)(1)(b), the applicant shall protect environmentally sensitive habitat areas and other resources, including birds, bats, amphibians and fish, soil and vegetation, by the following avoidance measures:
 - a. Standard Best Management Practices. BMPs, such as straw bales, coir rolls, and/or silt fencing structures shall be employed to ensure minimization of erosion resulting from tree removal and to avoid runoff into sensitive habitat areas. Construction fencing shall be utilized to protect sensitive habitat areas. Ground disturbance shall be limited to the minimum necessary and disturbed soil areas shall be stabilized as soon as feasible. Any soil stockpiles shall be covered or otherwise stabilized to prevent dust impacts. Any bare soil created by the tree removal activities project shall be revegetated with native vegetation and/or native seed mixes for soil stabilization. (See also "Best Management Practices." TD-7102P-01-JA01. PG&E. March 14, 2019.)
 - b. Birds. The bird breeding season typically extends from February to August. (1) *Seasonal Avoidance*: No surveys are required if activity occurs in the non-breeding season (September to January). **If development is to occur during the breeding season (February to August), a pre-construction survey is required within 14 days of the onset of construction to ensure that no nesting birds will be disturbed during development.** (2) *Nest Avoidance*: If active special status bird nests are observed, no ground disturbance activities shall occur within a minimum 100 foot exclusion zone. These exclusion zones may vary depending on species, habitat and level of disturbance. The exclusion zone shall remain in place around the active nest until all young are no longer dependent upon the nest. A biologist shall monitor the nest site weekly during the breeding season to ensure the buffer is sufficient to protect the nest site from potential disturbance. (3) Construction shall only occur during daylight hours to limit disturbing construction noise and minimize artificial lights.
 - c. Bats. Bat roost sites can change from year to year, so pre-construction surveys are usually necessary to determine the presence or absence of bat roost sites in a given area. (1) *Pre-construction surveys for bats*: Construction will ideally occur between September 1st and October 31 after the young have matured and prior to the bat hibernation period. **If it is necessary to disturb potential bat roost sites between February 11 and August 31, pre-construction surveys shall be performed by a qualified biologist 14 days prior to the onset of development activities.** If active bat roosts are observed, no ground disturbance activities shall occur within a minimum 100 foot exclusion zone. These exclusion zones may vary depending on species, habitat and level of disturbance. The exclusion zone shall remain in place around the active roost until all young are no longer dependent upon the roost. Pre-construction bat surveys involve surveying trees, rock outcrops, and buildings subject to construction for evidence of bat use (guano accumulation, or acoustic or visual detections). If evidence of bat use is found, then biologists shall

conduct acoustic surveys under appropriate conditions using an acoustic detector, to determine whether a site is occupied. If bats are found, a minimum 50 foot buffer shall be implemented around the roost tree. (2) Construction shall only occur during daylight hours to limit disturbing construction noise and minimize artificial lights. (3) **After tree felling, trees should be retained in place overnight, allowing any bats present to disperse.**

- e. Soil and vegetation. Clearly mark the staging area site with cones and surround with temporary fencing.
 - f. Special status amphibians. (1) *Contractor Education:* Within two weeks prior to construction activities, project contractors shall be trained by a qualified biologist in the identification of the California red-legged frog, foothill yellow-legged frog, Tailed frog, and the southern torrent salamander. (2) *Pre-construction search:* During ground disturbing activities, construction crews shall begin each day with a visual search around the staging and impact area to detect the presence of amphibians. (3) *Careful debris removal:* During construction and debris removal, any wood stockpiles shall be moved carefully by hand in order to avoid accidental crushing or other damage to amphibians. (4) *No construction during rain event:* If a rain event occurs during the construction period, all ground disturbing activities shall cease for a period of 48 hours, starting after the rain stops. Prior to resuming construction activities, trained construction crew member(s) shall examine the site for the presence of special status amphibians. (4.a) If no special status amphibians are found during inspections, ground-disturbing activities may resume. (4.b) If a special status amphibian is detected, construction crews shall stop all ground disturbing work and shall contact the California Department of Fish and Wildlife (CDFW) or a qualified biologist. Clearance from the CDFW will be required prior to reinitiating work. The CDFW will need to be consulted and will need to be in agreement with protective measures needed for any potential special status amphibians.
11. **The applicant shall partner with a local community agency, such as the Elk Community Service District or Greenwood Homeowners Association, and provide funding for a 1:1 tree replacement at an off-site location, which would provide a community benefit in preserving the forested areas near Elk, an unincorporated community in Mendocino County. The applicant shall partner with Save the Redwoods League by providing funding to treat five acres of forest land restoration, as part of the “Cape Vizeaino Forest Restoration Project.”**
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13. [Delete] ~~**When trees are removed, the applicant shall remove tree stumps and root balls. During the effective period of this permit, the landowners may plant low-stature, regionally native plants within the effected 36,655-square-foot area (approximate) and provide for irrigation, or hand watering, during the five years after planting (or until the plants are established).**~~

Updated Staff Report Attachment E

Tree Inventory and Exhibit dated May 9, 2022

Elk Substation Tree Inventory				
Tree ID	Species	DBH	Height	Property Ownership
1	Douglas fir-- <i>Psuedotsuga menziesii</i>	22	25	Greenwood Meadows Homeowners Association
2	mock orange-- <i>Philadelphus</i> sp.	12	15	Philip Kay
3	mock orange-- <i>Philadelphus</i> sp.	12	18	Philip Kay
4	mock orange-- <i>Philadelphus</i> sp.	12	18	Philip Kay
5	mock orange-- <i>Philadelphus</i> sp.	5	20	Philip Kay
6	mock orange-- <i>Philadelphus</i> sp.	8	18	Philip Kay
7	mock orange-- <i>Philadelphus</i> sp.	8	18	Philip Kay
8	mock orange-- <i>Philadelphus</i> sp.	8	18	Philip Kay
9	mock orange-- <i>Philadelphus</i> sp.	8	18	Philip Kay
10	mock orange-- <i>Philadelphus</i> sp.	14	18	Philip Kay
29	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
30	Douglas fir-- <i>Psuedotsuga menziesii</i>	12	24	PG&E
31	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	Philip Kay
32	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
33	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
34	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
35	Douglas fir-- <i>Psuedotsuga menziesii</i>	12	24	PG&E
36	Douglas fir-- <i>Psuedotsuga menziesii</i>	12	24	PG&E
37	Douglas fir-- <i>Psuedotsuga menziesii</i>	30	35	PG&E
38	Douglas fir-- <i>Psuedotsuga menziesii</i>	30	35	PG&E
39	Douglas fir-- <i>Psuedotsuga menziesii</i>	12	24	PG&E
40	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
41	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
42	Monterey cypress-- <i>Hesperocyparis macrocarpa</i>	99	45	PG&E
43	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
44	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
45	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
46	Douglas fir-- <i>Psuedotsuga menziesii</i>	45	40	PG&E
47	Douglas fir-- <i>Psuedotsuga menziesii</i>	45	40	PG&E
48	Douglas fir-- <i>Psuedotsuga menziesii</i>	26	40	PG&E
49	Tan oak-- <i>Lithocarpus densiflorus</i>	8	30	PG&E
50	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E

Elk Substation Tree Inventory				
Tree ID	Species	DBH	Height	Property Ownership
51	Tan oak-- <i>Lithocarpus densiflorus</i>	35	30	PG&E
52	Tan oak-- <i>Lithocarpus densiflorus</i>	14	30	PG&E
53	Douglas fir-- <i>Psuedotsuga menziesii</i>	26	40	PG&E
54	Tan oak-- <i>Lithocarpus densiflorus</i>	36	40	PG&E
55	Tan oak-- <i>Lithocarpus densiflorus</i>	14	30	PG&E
56	Tan oak-- <i>Lithocarpus densiflorus</i>	7	30	PG&E
57	Douglas fir-- <i>Psuedotsuga menziesii</i>	38	20	PG&E
58	Douglas fir-- <i>Psuedotsuga menziesii</i>	13	24	PG&E
59	Douglas fir-- <i>Psuedotsuga menziesii</i>	12	24	PG&E
60	Douglas fir-- <i>Psuedotsuga menziesii</i>	18	35	PG&E
61	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
62	Douglas fir-- <i>Psuedotsuga menziesii</i>	15	35	PG&E
63	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
64	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
65	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
66	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
67	Douglas fir-- <i>Psuedotsuga menziesii</i>	16	35	PG&E
68	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
69	Douglas fir-- <i>Psuedotsuga menziesii</i>	6	24	PG&E
70	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
71	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	PG&E
72	Douglas fir-- <i>Psuedotsuga menziesii</i>	9	22	PG&E
73	Douglas fir-- <i>Psuedotsuga menziesii</i>	13	24	PG&E
74	Douglas fir-- <i>Psuedotsuga menziesii</i>	13	24	PG&E
75	Douglas fir-- <i>Psuedotsuga menziesii</i>	9	22	PG&E
76	Douglas fir-- <i>Psuedotsuga menziesii</i>	9	22	PG&E
77	Douglas fir-- <i>Psuedotsuga menziesii</i>	8	24	Philip Kay
78	Douglas fir-- <i>Psuedotsuga menziesii</i>	16	24	Richard Mitchell
79	Douglas fir-- <i>Psuedotsuga menziesii</i>	20	22	Richard Mitchell
80	Douglas fir-- <i>Psuedotsuga menziesii</i>	18	45	Richard Mitchell
81	Douglas fir-- <i>Psuedotsuga menziesii</i>	14	18	Richard Mitchell
82	Douglas fir-- <i>Psuedotsuga menziesii</i>	14	18	Richard Mitchell
83	Douglas fir-- <i>Psuedotsuga menziesii</i>	14	18	Richard Mitchell
84	Douglas fir-- <i>Psuedotsuga menziesii</i>	16	22	Richard Mitchell
85	Douglas fir-- <i>Psuedotsuga menziesii</i>	18	28	Richard Mitchell

