



COUNTY OF MENDOCINO CANNABIS DEPARTMENT

125 EAST COMMERCIAL ST • WILLITS • CALIFORNIA • 95490

KRISTIN NEVEDAL, DIRECTOR

PHONE: 707-234-6680

FAX: 707-234-6337

cannabisprogram@mendocinocounty.org
www.mendocinocounty.org/cannabisprogram

INTRODUCTION

On October 4, 2022, the Board of Supervisors (the "Board") heard recommendations from the Cannabis Ad Hoc Committee. Some of those recommendations were passed to the General Government Committee with further direction given to staff. One such recommendation was for staff and the County Counsel's office to provide clarity, direction, and procedures regarding tree removal and vegetation modification in and around existing and proposed cannabis cultivation areas.

That tree removal and vegetation modification discussion occurred with the General Government Committee on December 12, 2022, and was continued to allow for further discussion and public input. Due to the reorganization of the General Government Committee at the beginning of 2023, the continued discussion was moved to be brought before the Board of Supervisors.

BACKGROUND

On April 4, 2017, Ordinance No. 4381 (the "Cannabis Ordinance") was approved and adopted by the Board, which laid the foundation for the current Mendocino County cannabis rules and regulations. Those rules and regulations were codified, in part, in the Mendocino County Code of Ordinances (the "MCC") § 10A.17.

Before the Cannabis Ordinance was approved, the County, under the direction of the Board, had the Draft Initial Study and Environmental Checklist dated November 7, 2016, with revisions prepared on or around March 21, 2017, (the "Initial Study"). That Initial Study recommended that the Board of Supervisors approve a mitigated negative declaration (the "MND"), which would make recommended changes to the proposed cannabis regulations. By approving the MND and adopting the Cannabis Ordinance as revised pursuant to the MND, the County fulfilled its California Environmental Quality Act ("CEQA") requirements. A complete environmental impact report on implementing the new cannabis program was not needed. One of the mitigation measures recommended by the Initial Study was to include a prohibition on tree removal for the purposes of developing a cultivation site.

As recommended, the Cannabis Ordinance was approved with the prohibition on the removal of certain tree species for the purposes of developing a cannabis cultivation site. The prohibition was codified in MCC § 10A.17.040. Shortly thereafter, on or around August 29, 2017, the Board approved additional language to MCC § 10A.17.090 via Ordinance No. 4392 (the "Revised Ordinance") that prevented the approval of an application if it would require the removal of those certain tree species on or after May 4, 2017. The Revised Ordinance allows applications to be approved if trees were removed before May 4, 2017, only if certain requirements are met.

The Cannabis Ordinance does, however, provide exemptions from the tree removal prohibition. The prohibition does not include the pruning for maintenance, or the removal of such trees if necessary to address safety or disease concerns. Additionally, for trees removed before May 4, 2017, the Revised Ordinance requires applicants to

provide evidence that “no trees were unlawfully removed to develop a cultivation site...” or “evidence that environmental impacts of the tree removal have been mitigated to the extent feasible or otherwise resolved.” In determining sufficient evidence, the Revised Ordinance states that “County staff shall defer to the resource protection agencies [CalFire, the NCRWQCB, and the CDFW] for determinations as to the unlawful removal of trees or unauthorized conversion of timberland or the sufficiency of any required remediation to address the environmental impacts.” There are no evidentiary requirements provided in the Cannabis Ordinance regarding the removal of trees for safety or disease concerns after May 4, 2017.

Given the ambiguity in evidentiary requirements for tree removal both pre-and post-May 4, 2017, the enforcement of the tree removal prohibition for already removed trees has been difficult and, to some extent, sparse. To further compound the confusion behind evidentiary requirements, the resource protection agencies, CalFire, the NCRWQCB, and the CDFW, do not have clear objective standards that the Mendocino County Cannabis Department (“MCD”) could easily adopt in making determinations on unlawful tree removal and/or remediation requirements.

On or around March 2022, MCD sought to address the tree removal prohibition on applications that it had concerns that the applicants had removed protected trees either before, or after, May 4, 2017. That implementation came in the form of letters sent by MCD to the applicable applicants and renewal applicants requesting additional evidence that they had not removed trees in violation of MCC § 10A.17 (the “15-day Vegetation Modification”). The letters stated that applicants had fifteen (15) days to provide such evidence, which could include, but was not limited to, an after-the-fact detailed report conducted by a licensed professional stating that the trees were not a protected species, that they were dead, dying, or diseased, and/or removed for fire safety. If the requested evidence wasn't provided in the requested timeframe, applicants and permit holders would have their applications denied and renewals would be placed on hold.

As a result of the 15-day Vegetation Modification Letters, MCD and the Board received several letters and comments from applicants, permit holders, and their respective agents and advocates. Those letters and comments expressed concern regarding, amongst other items, MCD's request for evidence that was not required at the time the tree removal would have occurred and adding evidentiary requirements not found in MCC § 10A.17 such as reports created by licensed professionals for trees removed years prior.

The ambiguity within MCC § 10A.17 combined with the lack of clarity provided by the resource protection agencies has left open questions as to (1) what evidence is acceptable to MCD when it has reason to believe trees have been improperly and/or illegally removed and (2) how to properly define “purposes of developing a cultivation site” and “safety or disease concerns” regarding tree removal. One attempt to answer that question was the issuance of the 15-day Vegetation Modification Letters. However, the Board has since asked County staff to provide further clarity, direction, and procedures regarding tree removal and to limit the bureaucracy needed to remove trees when allowed or otherwise required.

DISCUSSION

Ordinance Ambiguity

By electing to adopt the MND and a ministerial review process for cannabis permits, there must be objective criteria in the approval or denial of cannabis permit applications. Generally, the objective criteria are established within the cannabis regulations. Issues arise, however, when there is ambiguity in the regulations and policy standards have not been established.

The language provided in the tree removal prohibition found in MCC § 10A.17.040 (K) reads as follows:

“Prohibition on Tree Removal. Removal of any commercial tree species as defined by Title 14 California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak species (*Quercus* sp.) or Tan Oak (*Notholithocarpus* sp.) for the purpose of developing a cannabis cultivation site is prohibited. This prohibition shall not include the pruning of any such trees for maintenance, or the removal of such trees if necessary to address safety or disease concerns.”

MCC § 10A.17.040.

The language is clear in describing the protected tree species that cannot be removed. Ambiguity exists, however, when defining the “purpose of developing a cannabis cultivation site” and “safety or disease concerns.” As the Ordinance is ministerial in nature, MCD has been tasked with providing objective standards to those ambiguous terms. However, these ambiguities touch on important policy issues that may be more suitable for Board direction or resolution. Below is a discussion regarding the potential definitions and recommendations for the Board.

Purpose Of Developing A Cannabis Cultivation Site

The ambiguity in the term “purpose of developing a cannabis cultivation site” is found in determining the definition of “purpose of developing” because “cultivation site” is defined in MCC § 10A.17.020. A “cultivation site” is defined as follows:

“‘Cultivation site’ means one (1) or more locations or facilities on one (1) legal parcel (or one (1) or more legal parcels if specifically allowed for by this Chapter 10A.17) subject to a single approved Permit for the cultivation of cannabis where cannabis is planted, grown, harvested, dried, cured, graded, trimmed, or processed, or that does all or any combination of those activities. One (1) or more areas of cannabis cultivation may exist on the legal parcel used for that purpose.”

MCC § 10A.17.020.

It is clear from the definition above that the tree removal prohibition was to include the removal of the protected tree species from areas in which cannabis would exist throughout the growing and processing cycle. The ambiguity occurs when defining tree removal for the “purpose of developing” such a cultivation site.

In addition to the facilities included in the definition of a cultivation site, there are several supporting structures and/or land improvements that are required to properly run and maintain a commercial cannabis cultivation operation. Those supporting structures and/or land improvements include, but are not limited to, irrigation ponds, roads, solar

panels, commercial restrooms, ADA-compliant parking, etc. The question presented when taking those into consideration is whether those supporting structures and/or land improvements fall within the definition of “purpose of developing a cannabis cultivation site” when determining whether improper tree removal occurred.

As some helpful background, when an ambiguous statute or regulation is interpreted by a court, it will typically consider evidence of the lawmakers' intent beyond the words of the statute. Courts may examine a variety of extrinsic aids, including the statutory scheme of which the provision is a part, the history and background of the statute, the apparent purpose, and any consideration of constitutionality, in an attempt to ascertain the most reasonable interpretation of the measure. (*Hughes v. Board of Architectural Examiners* (1998) 17 Cal. 4th 763, 776). A court will select a construction that comports most closely with the apparent intent of the lawmakers, with a view to promoting rather than defeating the general purpose of the statute, and avoiding an interpretation that would lead to absurd consequences. (*Day v. City of Fontana* (2001) 25 Cal. 4th 268, 272). Additionally, when an administrative agency is charged with enforcing a particular statute, that agency's interpretation of the statute will be accorded great respect by the courts and will be followed if not clearly erroneous. (*Boling v. Public Employment Relations Bd.* (2018) 5 Cal. 5th 898, 911).

Here, MCD is the administrative agency charged with implementing and enforcing the County's cannabis regulations, including the tree removal prohibition. MCD, however, requests the Board's input and direction in developing definitions and policies on the tree removal prohibition given the important policy issues involved and the potential impact the policy may have on the County. To develop those definitions, the applicable tree removal prohibition must be interpreted using similar methods a court would utilize.

One major factor taken into consideration when interpreting a regulation is the lawmakers intended purpose of the regulation. As mentioned above, the tree removal prohibition was added pursuant to a mitigation measure of the MND. Since the mitigation measure was recommended in the Initial Study, that Initial Study is taken into consideration when interpreting regulations added by the MND, as well as the Board's intent when adopting the MND.

In recommending the tree removal prohibition in the MND, the Initial Study recognized the following: (1) the potential impact on forestry resources associated with the cultivation of cannabis includes areas cleared of timber for the installation of roadways, water storage, and cultivation sites; (2) there is a baseline condition of existing cannabis cultivation that had caused trees to be removed; and (3) Cal Fire reported a surge in a number of CEQA-exempt Less-Than-Three acre Conversions as cannabis cultivators moved into forested landscapes. The Initial Study states that “[i]n order to prevent future conversion of forestry resources [the tree removal prohibition] is recommended.” (See the Initial Study, pg. 37).

Taking those statements into consideration, it is clear that the MND was meant to prevent the creation of new cannabis cultivation sites, the expansion of existing cannabis cultivation sites, and the installation of roadways and water storage if the creation of such sites and installations would require the removal of any covered tree species. However, the question remains whether the MND meant to prevent cannabis cultivation sites that existed at the time the Cannabis Ordinance was adopted from building other

needed supporting structures and/or land improvements or improving existing roadways and water storage if any protected tree species had to be removed to build such structures or improvements.

As such, MCD is requesting the Board to adopt a resolution that provides a definition or clarification on the terms “purpose of developing” contained in the tree removal prohibition found in MCC § 10A.17.040(K). MCD, with support from County Counsel and outside counsel, has prepared the following three potential definitions for consideration and comment:

- 1) “purpose of developing a cultivation site” shall mean the alteration, grading, removal, or other development of land to create, or expand, a cultivation site, as that term is defined in MCC § 10A.17.020.
- 2) “purpose of developing a cultivation site” shall mean the alteration, grading, removal, or other development of land to create, or expand, a cultivation site, as that term is defined in MCC § 10A.17.020, supporting structures, or land improvements. For this definition, “land improvements” shall include, but not be limited to, such items as excavation, non-infrastructure utility installation, driveways, parking lots, retaining walls, fences, and outdoor lighting.
- 3) “purpose of developing a cultivation site” shall mean the alteration, grading, removal, or other development of land for the benefit of an existing or proposed cultivation site, as that term is defined in MCC § 10A.17.020.

Definition #1 limits the definition to the creation or expansion of a cultivation site, which includes all facilities that will ever contain cannabis. However, it does not include supporting structures or land developments. This definition will allow cannabis cultivators to continue to use existing cannabis cultivation sites by allowing the building of required supporting land improvements. By allowing such removal there is a concern that there is, or will be, a large number of applicants and permit holders who have removed protected tree species or will remove protected tree species to create supporting land improvements.

Definition #2 expands the definition to include supporting structures and land improvements, in addition to preventing the creation or expansion of a cultivation site. By including those into the definition, some existing cannabis cultivation sites will be unable to receive permits because they are required to make land improvements to either receive building permits or make their site a viable commercial farm. However, the addition of those terms in the definition will significantly limit the environmental impact of existing and new commercial cannabis cultivation sites as it will decrease the number of allowable sites and prevent any further development. This definition will also prevent the creation of new, and expansion of existing, cannabis cultivation sites if protected tree species were removed or are proposed to be removed.

Definition #3 is all-encompassing as it includes any land improvements that will benefit the cannabis cultivation site, which will include ponds, roads, solar panels, expansions, sheds, etc. This definition will prevent any development that results in the removal of protected tree species if it is meant to benefit a cannabis cultivation site. One

notable consequence of this definition is that when an applicant needs to improve a road to access their home, which requires the removal of a tree, and that road also serves as access to their cannabis cultivation site they must choose between improving that road and their livelihood.

As stated above, MCD requests the Board adopt a resolution amending MCC § 10A.17.040(K) by defining the terms “purpose of developing” contained in the tree removal prohibition.

Safety and Disease Concerns

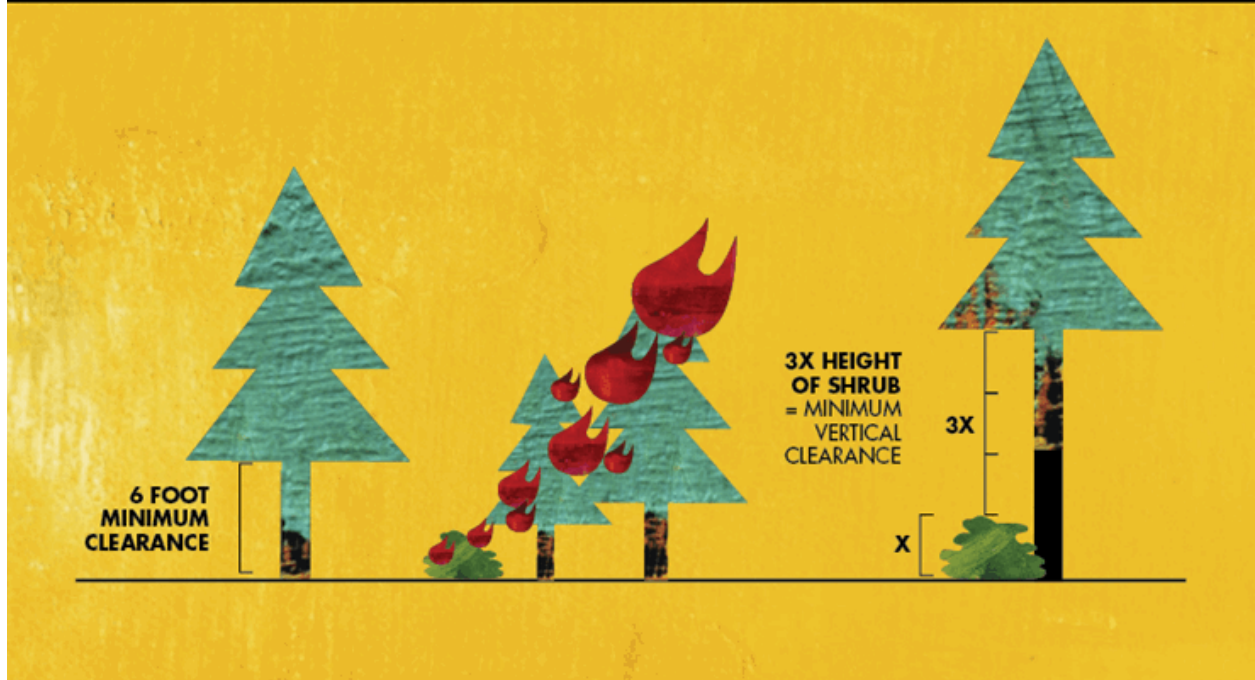
The term “safety and disease concerns” is ambiguous in that it does not refer to any objective standards to be applied in implementing or enforcing the regulation. In recommending the tree removal language, the Initial Study does not provide any comments regarding the intended purpose of allowing tree removal for “safety and disease concerns.” As such, the words should be given their usual, ordinary, commonsense meaning understood at the time of the enactment. (*People v. Cruz* (1996) 13 Cal. 4th 764, 782).

When applying the above interpretation standard to “disease concerns,” objective standards can be established when enforcing the tree removal prohibition in that the removal of a protected tree species is proper if it was diseased or there were actual disease concerns. We further discuss proposed evidentiary standards to establish that fact below.

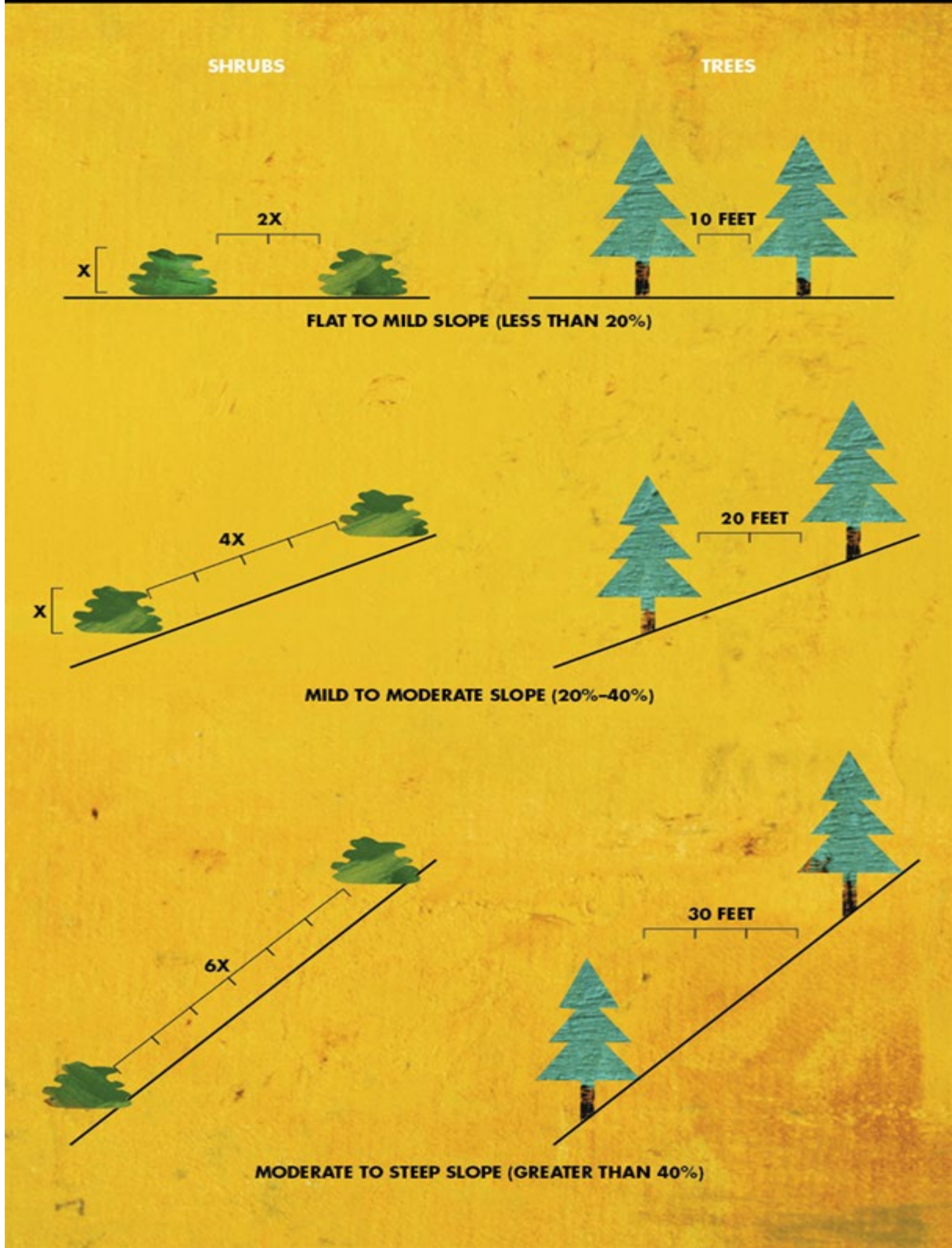
As for the term “safety ... concerns,” the usual, ordinary, commonsense meaning of this term can be a very broad interpretation that would include anything from, in the terms of cannabis operations, expanding an old road or building a new one, building a pond, clearing out vegetation, etc. To narrow the interpretation so the tree removal prohibition does not contain a large enough loophole to make it ineffective, objective “safety...concerns” standards must be established.

In developing such standards, MCD looks to other state agencies and their standards for safety. For instance, CalFire has established standards and recommendations for fire safety and prevention. When creating minimum horizontal clearance, CalFire recommends 10 ft. spacing between trees when there is a slope under 20%; 20 ft. spacing for 20%-40% slopes; and 30 ft. spacing for slopes greater than 40%. For minimum vertical clearance, CalFire recommends 6 ft. minimum clearance for trees and 3x the height of any shrub below the trees. Below are visual examples of those CalFire standards.

MINIMUM VERTICAL CLEARANCE



MINIMUM HORIZONTAL CLEARANCE



(CALFIRE, <https://www.fire.ca.gov/programs/communications/defensible-space-prc-4291/> (last visited 12/2/2022)).

CalFire also provides applicants with requirements to bring their cannabis cultivation site into compliance with fire safety regulations. Those fire safety requirements may require the removal of protected tree species. Such removal would be allowed under MCC § 10A.17.040(K) if it addressed fire safety requirements of cannabis cultivation sites that existed before the adoption of the Cannabis Ordinance.

Given the potentially broad interpretation of the term "safety...concerns," MCD requests direction from the Board to apply CalFire standards and requirements when determining whether the removal of a protected tree species was proper for "safety...concerns." We discuss the proposed evidentiary standards needed to fall within this exemption below.

Evidentiary Standards

After the objective standards are established, MCD needs to develop the evidentiary standards when applicants claim the removal of a protected tree species falls within an exemption. The evidentiary standard that will be applied if any denial is reviewed by a court is whether the preponderance of evidence supported such denial. The County and MCD cannot change that standard. However, when reviewing applications, MCD must determine how much weight to give the submitted evidence when there is contradictory evidence.

Initially, as mentioned above, MCD requested that applicants and permit holders provide reports from licensed professionals. After further consideration, however, that evidentiary standard presents additional issues because such reports were not required at the time the trees were removed. Requiring after-the-fact reports, when applicants or permit holders had no notice that such reports would be required, may be of limited probative value and insufficient to address the range of issues. Rather, MCD worked with County Counsel and outside counsel to create the Affidavit for Tree Removal for Cannabis Cultivators (the "Affidavit"), attached here as Exhibit A.

The proposed Affidavit will provide MCD with an evidentiary basis to decide on the sufficiency and reliability of evidence provided by applicants and permit holders where trees have already been removed. The Affidavit allows applicants and permit holders to attest, under penalty of perjury, to the facts that determine whether the tree removal complied with the ordinance. The Affidavit is in a format that is easy to follow and complete, and it provides an opportunity for the individuals to provide further clarification and support for their assertions.

The examples of support included in the Affidavit are items that would have been required to properly remove a tree at the time of the tree removal. For example, prior to removing a commercial tree species for fire safety concerns, individuals would have had to submit a Timber Harvesting Plan Exemption Form with CalFire. The Affidavit requests such information and documentation. However, the Affidavit will not catch all scenarios. There will be times when such information and documentation were not required before removing the trees, the trees were removed for otherwise lawful purposes, or the tree removal was permitted by responsible agencies.

Given the probability that MCD will receive various levels of evidentiary support along with the Affidavit, MCD will need to decide that either (1) the submissions or extraneous information warrants further inquiry or (2) the totality of the evidence is sufficient to grant or deny the application. In making that determination and balancing

evidence, MCD must apply a certain weight to all the evidence that it has to review. For example, MCD cannot take submitted Affidavits as the ultimate truth when there is extraneous evidence that supports the Affidavit is incorrect. As such, MCD is working to develop evidentiary standards and requests direction from the Board.

CONCLUSION

As discussed above, given the ambiguity of the tree prohibition in MCC § 10A.17 and the important policy considerations involved, MCD would like to ask the committee to consider possible recommendations to the Board to clarify certain ambiguities in the existing ordinance related to tree removal, including the possibility of a clarifying amendment to the ordinance. Specifically, MCD requests the following:

1. MCD requests direction from the Board on whether to develop an amendment to MCC § 10A.17 that would define and clarify the terms “purpose of developing” contained in the tree removal prohibition found in MCC § 10A.17.040(K).
2. MCD requests direction from the Board on whether to apply CalFire standards and requirements when determining whether the removal of a protected tree species was proper for “safety...concerns” under MCC § 10A.17.040(K).
3. MCD requests direction from the Board regarding evidentiary standards and assigned weight of submitted evidence that MCD will use to review Affidavits in deciding that either (1) the submissions or extraneous information warrants further inquiry or (2) the totality of the evidence is sufficient to grant or deny the application.

KKN/jss

Exhibit A

AFFIDAVIT FOR TREE REMOVAL
FOR CANNABIS CULTIVATORS

State of California
County of Mendocino

This affidavit concerns the removal of certain commercial tree species, as defined by Title 14 California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District (see attached) (“**Commercial Tree Species**”) and certain oak species, defined as any true oak species (*Quercus* sp.) and any Tan Oak species (*Notholithocarpus* sp.) (“**Oak Tree Species**”)(collectively, “**Covered Tree Species**”) pursuant to Section 10A.17.040, subdivision (K), of the Mendocino Cannabis Cultivation Ordinance.

I do hereby swear, certify and affirm the following:

1) Affirmation of knowledge and authority to make these representations as to all relevant facts:

- I am the duly authorized representative of the applicant.
- These representations are made on behalf of the property owner, the applicant, and any other person working for, on behalf of, or acting with the permission of the owner or the applicant.

2) Were any trees removed from the property:

- No trees were removed within 150 feet of my existing or proposed cannabis cultivation site or any related pond or other source of irrigation used for the cultivation of cannabis, where a structure exists within the existing or proposed cannabis cultivation site or any related pond or other source of irrigation used for the cultivation of cannabis.
- No trees were removed within 50 feet of my existing or proposed cannabis cultivation site or any related pond or other source of irrigation used for the cultivation of cannabis, where no structure exists within the existing or proposed cannabis cultivation site or any related pond or other source of irrigation used for the cultivation of cannabis.

3) If you did not check one or more boxes in Section 2, check the appropriate box below, and provide an explanation:

- The trees were removed on or after May 4, 2017.
- The trees were removed prior to May 4, 2017.
- Trees were removed prior to May 4, 2017, and on or after May 4, 2017.

Please provide the approximate dates when the trees were removed, and provide any documentation in support of those approximate dates:

4) If you did not check one or more boxes in Section 2, check the appropriate box below, and provide an explanation:

- One or more trees were removed from the Property, and they were Covered Tree Species.
- One or more trees were removed from the Property, but they were not Covered Tree Species.

Please explain how it was determined the trees removed were not Covered Tree Species, and provide any documentation in support of the determination that the trees removed were not Covered Tree Species:

5) If you checked the first box in Section 4, check one or more of the boxes below, as appropriate, and provide an explanation:

- The removal of one or more Covered Tree Species was not for the *purpose of developing my existing or proposed cannabis cultivation site.

Please explain the purpose of removing the Covered Tree Species, and provide any documentation in support of the Covered Tree Species removal, such as a copy of any approved Timber Harvesting Plan or any Timber Harvesting Plan Exemption for the site:

- One or more of the Covered Tree Species that were removed were not sold, bartered, exchanged, or traded.

Please state approximately how many Covered Tree Species were removed and explain how the trees were used or disposed of:

- One or more Covered Tree Species were removed for the purpose of addressing safety or disease concerns.

Please explain what safety or disease issues were addressed, how the Covered Tree Species removal was consistent with CalFire recommendations for addressing safety concerns, and any documentation in support of the Covered Tree Species removal, such as a copy of any approved Timber Harvesting Plan or any Timber Harvesting Plan Exemption for the site:

6) If you checked the second box in Section 4, but did not provide documentation that the tree species removed were not Covered Tree Species, check one or more of the boxes below, as appropriate, and provide an explanation:

- The removal of one or more potentially Covered Tree Species was not for the *purpose of developing my existing or proposed cannabis cultivation site.

Please explain the purpose of removing the potentially Covered Tree Species, and provide any documentation in support of the potentially Covered Tree Species removal, such as a copy of any approved Timber Harvesting Plan or any Timber Harvesting Plan Exemption for the site:

- One or more of the potentially Covered Tree Species that were removed were not sold, bartered, exchanged, or traded.

Please state approximately how many potentially Covered Tree Species were removed and explain how the trees were used or disposed of:

- One or more potentially Covered Tree Species were removed for the purpose of addressing safety or disease concerns.

Please explain what safety or disease issues were addressed, how the potentially Covered Tree Species removal was consistent with CalFire recommendations for

addressing safety concerns, and any documentation in support of the potentially Covered Tree Species removal, such as a copy of any approved Timber Harvesting Plan or any Timber Harvesting Plan Exemption for the site:

* "Purpose of developing a cultivation site" means _____

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed this _____ day of _____, 20__ in _____ (City or County), _____ (State)

[NOTARIZED]

**Title 14 California Code of Regulations section 895.1, Commercial Species for
the Coast Forest District and Northern Forest District**

Coast Forest District Commercial Trees

coast redwood (*Sequoia sempervirens*)
Douglas-fir (*Pseudotsuga menziesii*)
grand fir (*Abies grandis*)
western hemlock (*Tsuga heterophylla*)
western redcedar (*Thuja plicata*)
bishop pine (*Pinus muricata*)
Sitka spruce (*Picea sitchensis*)
incense cedar (*Calocedrus decurrens*)
Port Orford cedar (*Chamaecyparis lawsoniana*)
California red fir (*Abies magnifica*)
white fir (*Abies concolor*)
Jeffrey pine (*Pinus jeffreyi*)
ponderosa pine (*Pinus ponderosa*)
sugar pine (*Pinus lambertiana*)
western white pine (*Pinus monticola*)
tan oak (*Notholithocarpus densiflorus*)
red alder (*Alnus rubra*)
white alder (*Alnus rhombifolia*)
Pacific madrone (*Arbutus menziesii*)
golden chinkapin (*Chrysolepis chrysophylla*)
California bay laurel (*Umbellularia californica*)
Oregon white oak (*Quercus garryana*)
California black oak (*Quercus kelloggii*)
Monterey pine (*Pinus radiata*)

Northern Forest District Commercial Trees

sugar pine (*Pinus lambertiana*)
ponderosa pine (*Pinus ponderosa*)
Jeffrey pine (*Pinus jeffreyi*)
western white pine (*Pinus monticola*)
lodgepole pine (*Pinus contorta*)
coast redwood (*Sequoia sempervirens*)
white fir (*Abies concolor*)
California red fir (*Abies magnifica*)
noble fir (*Abies procera*)
Douglas-fir (*Pseudotsuga menziesii*)
incense-cedar (*Calocedrus decurrens*)
Port Orford cedar (*Chamaecyparis lawsoniana*)
Group Bknobcone pine (*Pinus attenuata*)
gray pine (*Pinus sabiniana*)
California black oak (*Quercus kelloggii*)
Oregon white oak (*Quercus garryana*)
tan oak (*Notholithocarpus densiflorus*)
mountain hemlock (*Tsuga mertensiana*)
Brewer spruce (*Picea breweriana*)
Englemann spruce (*Picea englemanii*)
giant sequoia (*Sequoiadendron giganteum*)
golden chinkapin (*Chrysolepis chrysophylla*)
foxtail pine (*Pinus balfouriana*)
white alder (*Alnus rhombifolia*)
Monterey pine (*Pinus radiata*)
Pacific madrone (*Arbutus menziesii*)
California bay laurel (*Umbellularia californica*)
Western juniper (*Juniperus occidentalis*)