



GHD Project ID: 12603187

**718 Third Street,
Eureka, California 95501
United States
ghd.com**

February 25, 2026

**Cliff Johnson
County of Humboldt Planning and Building Department
3015 H Street
Eureka, CA 95501**

Re: Life Plan Humboldt – Humboldt Commons Project, McKinleyville, CA

Justification for Development within Wetland Buffer Areas

Dear Cliff Johnson,

The proposed Life Plan Humboldt, Humboldt Commons Project (Project), includes an approximate 0.73 acre mitigation wetland area and 50-foot buffer consistent with requirements detailed in the McKinleyville Community Plan (Humboldt County 2002 amended 2017) and McKinleyville Town Center Zoning Amendment (Humboldt County 2025).

Life Plan Humboldt values the ecosystem functions and services the wetland mitigation area and associated buffer zone provides to the community. Proposed development within the wetland buffer area consists primarily of low-impact development consistent with Section 3240 of the McKinleyville Community Plan (Humboldt County 2002 amended 2017) and may include 1) a stormwater bioretention and detention basin, 2) an earthen berm separating the mitigation wetland from the stormwater features, 3) a paved walking trail along the top of the earthen berm to provide pedestrian access for residents to view wetland habitat, 4) a utility pole located approximately 45 feet from the mitigation wetland boundary, and 5) buried utility lines including water, sewer, storm drain, electrical, and communication.

A Wetland Habitat Mitigation and Monitoring Plan (WHMMP) will be implemented for the Project to guide wetland mitigation, monitoring efforts, and success criteria. The proposed final wetland mitigation area is designed to provide ecological uplift to the Project site by increasing the total wetland habitat available onsite and enhancing the value and function of existing wetlands. Proposed wetland areas will be enhanced through replanting with a diverse array of native wetland vegetation and by increasing wetland basin depth to extend the hydroperiod and shift the water regime from seasonally saturated to seasonally flooded conditions. The extended hydroperiod will create higher quantities of aquatic habitat for a longer duration of time throughout the season. The seasonally flooded wetlands are expected to provide enhanced habitat and breeding opportunities for native amphibians such as the Pacific tree frog (*Pseudacris regilla*) and northern red-legged frog (*Rana aurora*) while remaining unsuitable for successful breeding of non-native invasive species such as American bullfrog (*Lithobates catesbeianus*) which require permanent ponding to facilitate breeding and larval development. Constructed wetland areas, side slopes, and transition zones will be replanted with native wetland vegetation known to occur in the local vicinity and native migratory bird species are expected to benefit from enhanced nesting and forage opportunities within and around the proposed wetland. The proposed developments within the wetland buffer zone are primarily low-impact and are designed to avoid degradation of wetland quality and function through physical separation, flow direction, and treatment controls.

Justification for the proposed developments within the wetland buffer are provided below in Table 1 and are based on Section 3420 of the McKinleyville Community Plan (Humboldt County 2002 amended 2017) and McKinleyville Town Center Zoning Amendment (Humboldt County 2025).

Table 1: Development Within Wetland Buffer Areas (McKinleyville Community Plan Section 3420)

18. To prevent land uses or development which may degrade adjacent wetlands, all development within the wetland buffer shall include the following mitigation measures:
A. No more than 25% of the lot surface shall be made effectively impervious by development activities. The paved pedestrian walking trail and utility pole footprint represent the extent of proposed impervious surfaces within the wetland buffer and the combined surface area of these features will not exceed more than 25% percent of the wetland buffer area.
B. The release rate of storm runoff to adjacent natural wetlands, in any size storm, shall not exceed the natural rate of storm runoff for a 50 year storm of 10 minute duration. The proposed bioretention and detention basins incorporated into the wetland buffer are designed to intercept, detain, treat, and redirect stormwater runoff from the Project site away from the mitigation wetland. The stormwater treatment design is consistent with the stormwater quality requirements detailed in the Humboldt Low Impact Development Stormwater Manual, v3.0 (Humboldt County 2021) and peak flow mitigation requirements outlined in the McKinleyville Community Plan (Humboldt County 2002 amended 2017) and the Humboldt County General Plan (Humboldt County 2017). Stormwater runoff to the mitigation wetland would not be expected to exceed the natural rate of stormwater runoff for a 50-year storm of 10-minute duration.
C. Stormwater outfalls, culverts, gutters, and other similar facilities, shall be dissipated. The proposed bioretention and detention basins will intercept, detain, and treat stormwater runoff prior to discharge away from the mitigation wetland. Treated stormwater will be dissipated over vegetated or rocked areas.
D. Septic systems or alternative waste disposal systems must meet standards of the Humboldt Del Norte Health Department and the Regional Water Quality Control Board. Septic systems or alternative waste disposal systems are not proposed within the wetland buffer at this time. The project will connect to the McKinleyville Community Services District (MCSD) municipal sanitary sewer system for waste disposal. The sanitary sewer system and connection will be designed and constructed in accordance with MCSD standards.
E. Areas disturbed during construction, grading, or related activities within 100 feet of the boundary of the wetland in areas outside of the Urban Development Area, and 50 feet of the boundary of the wetland in areas within the Urban Development Area, shall be restored to original contours and sufficiently and promptly replanted with vegetation naturally occurring in the immediate area. The proposed final mitigation wetland and immediately adjacent areas may not reflect the original pre-project contours but will be subject to the monitoring efforts and success criteria outlined in the Project WHMMP. The proposed mitigation wetland is expected to enhance the value and function of the existing wetlands by increasing the depth of the bottom of the wetland to approximately 1-foot below the wet season water table to convert the water regime from seasonally saturated to seasonally flooded, creating higher quantities of aquatic habitat for a longer duration of time throughout the season. Wetland side slopes will be graded at a slope no greater than 3:1 to reduce potential for erosion and will be promptly replanted with appropriate native vegetation naturally occurring in the area as detailed in the Project WHMMP.
F. Development and construction shall minimize cut and fill operations and erosion and sedimentation potentials through construction of temporary and permanent sediment basins, seeding or planting bare soil, diversion of run-off away from graded areas and areas heavily used during construction, and avoidance of grading in the buffer areas during the rainy season (November to April)

A Stormwater Pollution Prevention Plan (SWPPP) and other construction Best Management Practices (BMP's) such as erosion, sediment, and pollutant control and other soil stabilization measures will be employed for the Project during construction. Typical SWPPP and other construction BMPs that may be employed for the Project under the direction of a Qualified SWPPP Developer (QSD) will include, as appropriate, temporary installation of straw wattles, silt fences, small check dams, and/or other soil stabilization measures during construction. The SWPPP will also employ seeding, planting, and/or mulching treatments for bare soil, and additional stormwater protection measures and monitoring prior to and during rain events at the direction of the QSD. Graded slopes adjacent to the mitigation wetland and within the wetland buffer will not exceed a 3:1 ratio to reduce potential for erosion and sedimentation into the mitigation wetland. Additionally, a seasonal no-work window will be observed, unless otherwise authorized by the County and/or other regulatory agencies, during the rainy season (November-April) where no grading will occur within the mitigation wetland or buffer area.

19. No land use or development shall be permitted in Wetland Buffer Areas which degrade the wetland or detract from the natural resource value.

The proposed stormwater bioretention and detention basin will be separated from the mitigation wetland by an earthen berm along the outside perimeter of the mitigation wetland. The berm will be integrated into upland areas of the wetland buffer and associated side slopes of the berm will not exceed a 3:1 ratio to reduce potential for erosion and sedimentation to adjacent areas. The proposed bioretention and detention basin will be designed to intercept stormwater and potential pollutants from the Project site, discharge the treated stormwater away from the mitigation wetland area, and is not expected to negatively impact or degrade the mitigation wetland. The proposed pedestrian walking trail will be situated along the top of the earthen berm and will be gently cross-sloped toward the bioretention and detention basin to direct associated runoff away from the mitigation wetland and avoid potential impacts.

The utility pole is proposed to be located within the outer edge of the wetland buffer, along the proposed Mid-Town Trail, approximately 45 feet from the wetland boundary. When necessary, the utility pole can be accessed from the proposed Mid-Town Trail which is completely outside of the wetland buffer.

Buried utility lines proposed within the wetland buffer may include water, sewer, storm drain, electrical, and communication. Trenches for the proposed utility lines within the wetland buffer will be backfilled with engineered fill. Topsoil will be placed within the top 12 inches of the surface and will be seeded with native vegetation compatible with the wetland buffer zone.

20. The County shall request the Department of Fish and Game to review plans for development within 200 feet of the boundary of the wetland.

Life Plan Humboldt welcomes comments and/or recommendations made by the California Department of Fish and Wildlife to avoid and/or minimize potential impacts from proposed developments within the wetland buffer to the mitigation wetland and to preserve the ecosystem functions and services it provides to the community.



Please reach out with any comments or questions regarding this letter,

Sincerely,

A handwritten signature in dark ink, appearing to read "Miles Hartnett", is positioned above the printed name.

Miles Hartnett
GHD Biologist/Wetland Scientist
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