

Planners and MMAC,

The wetlands behind Safeway are NOT the highly degraded wetlands as espoused by Pierson's consultant. A highly degraded wetland looks like the roadside mowed wetlands along the 101 corridor Eureka to Arcata. With the 101 highway improvements—Caltrans was required by regulatory agencies to mitigate these wetlands with minimal function and value, at a 4:1 ratio. **The proposed 1.25:1 mitigation ratio suggested** for the Town Center project is far too low to be realistic..

One also needs to keep in mind that most of the parcel behind Safeway is already a one-parameter wetland. Therefore any wetland mitigation performed there will not be wetland creation, it will be "restoration" or "enhancement" per regulatory agencies. This means you will not achieve a "no net loss" of wetland acreage. Instead you will be seeking to offset losses to wetland function. Suggest striking the reference to not net loss (as it infers no net loss acreage) in your document.

Another nuance to wetland mitigation and wetland mitigation ratios is **wetland crediting ratios**. Wetland creation when done ahead of time can typically credit at 1:1. However wetland enhancement and restoration, depending on the environmental baseline, will typically garner credit at within a range of 3:1 for wetland proposed to be improved or as low as even as 10:1. So for example, 10 acres of wetland enhancement may garner between 3.3 acre to one-acre of mitigation credit.

Here's how it may look in a final equation...

EXAMPLE ONLY: **Wetland impact of 2 acres**, Mitigation Ratio of 4:1 determined by regulatory agencies. Project Needs 8 acres mitigation credit. Developer negotiates a reduced mitigation ratio with a plan to developing mitigation in advance of project impact thereby creating the ability to demonstrate mitigation success prior to project impact. Agencies agree to 2:1 ratio if mitigation can be proven successful prior to impact. Therefore **four acres advanced mitigation** would be required.

Restoration Credit Ratio for proposed enhancements determined by regulatory agencies to be **3:1**. Twelve acres of enhancements is proposed to provide four acres of mitigation credit. The enhancement are done in advance of project impact, demonstrated to be successful and the project is fully mitigated prior to impact.

Another valid option for the parcel behind Safeway would be to create a wetland mitigation bank. This would allow the Pierson's to monetize the wetland function/value while maintaining open space. An acre of mitigation credit has the value of approximately \$750k per acre credit. The 40-acre pasture might produce 10-15 acres of wetland credit. A credible market exists for the sale of wetland credits. As a retired wetland biologist and mitigation specialist, I would be more than happy to volunteer my expertise to further vet this option with project planners and the Pierson's.

Thank you for the opportunity to provide comments for the public record.

Kelley Garrett
McKinleyville resident