

BRIEFING BOOK

W9b

for

California Coastal Commission

Newport Banning Ranch – Application 5-13-032

October 7, 2015



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EXECUTIVE SUMMARY

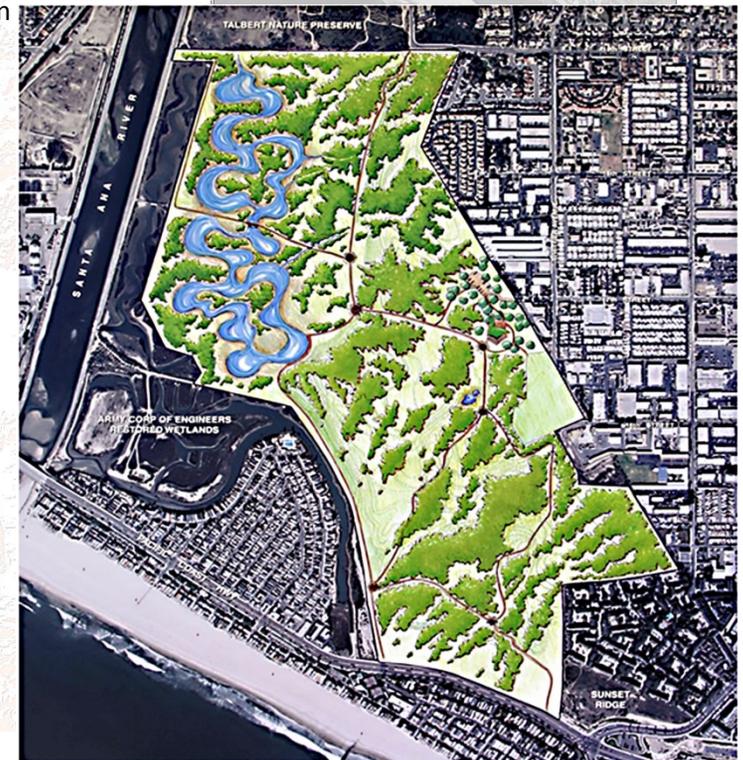
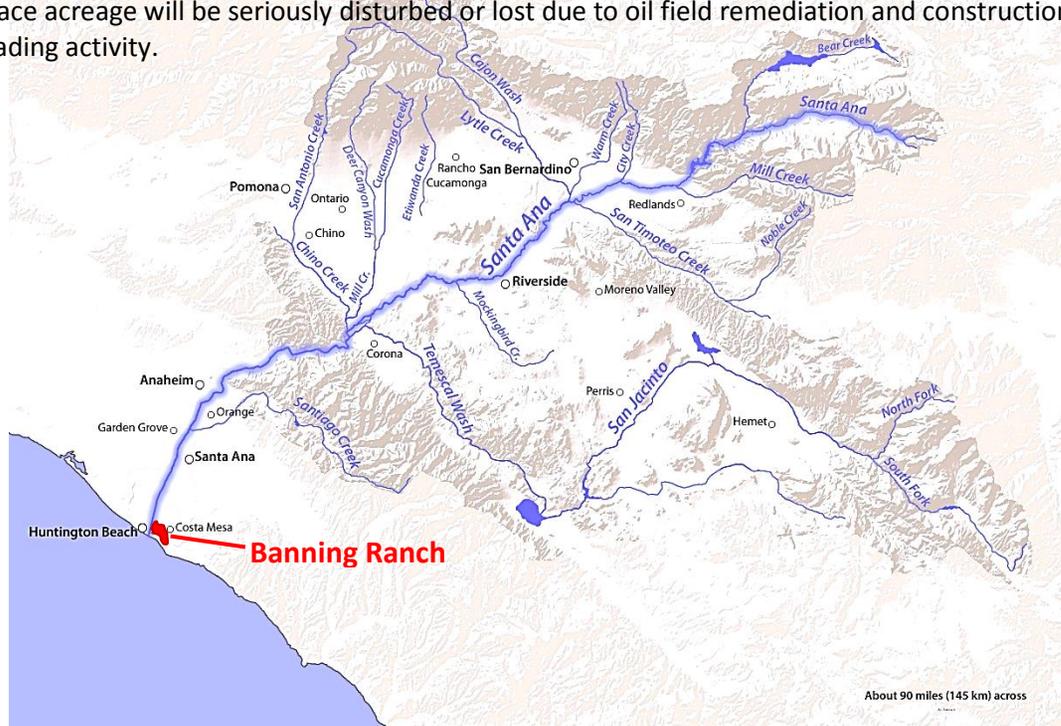
For all the reasons enumerated in the Coastal Commission Staff Report on Application 5-13-032 (Newport Banning Ranch), **the Banning Ranch Conservancy supports the staff recommendation for DENIAL of the project.**

The Banning Ranch Conservancy, further, finds additional and substantial reasons that the project should be denied. They are discussed herein.

Additionally, **the Banning Ranch Conservancy objects to the scheduled hearing on the above application on the basis that the application is incomplete.** The project has been segmented by the applicant, with concurrence of the staff, into two supposedly separate and distinct projects, resulting in segmentation of the overall project. The overall project, in all documentation, includes a development proposal that is based upon and contingent upon and includes consolidation (to include abandonment, remediation and translocation) of oil field operations.

SITE DESCRIPTION

- Banning Ranch at 401.1 acres is the last large parcel of unprotected privately owned coastal open space in Southern California, located where the Santa Ana River meets the Pacific Ocean.
- Branches of the active Newport Inglewood Fault, source of the Long Beach 6.3 earthquake of 1933, traverse the property.
- The site was occupied by both the Gabrielino and Juaneño Native Americans. Cultural resources have been found on the Banning Ranch site and many more archeological resources are likely still present, yet to be found.
- The current property is all that remains of the historic Banning Ranch. Over 90% has been sold and developed. This is the compromise – the balance.
- Oil drilling operations began in 1943. Peak annual oil production in the early 1980's was roughly 1.2 million barrels of oil with over 300 active wells. Production now averages approximately 90,000 barrels per year with approximately 60 active wells.
- At least 136 acres would be developed - 77 acres of housing, retail/commercial space, and resort development, 17 acres of roadways, 17 acres of oil consolidation activity, 25 acres of developed parks and additional unknown acreage for infrastructure and other appurtenances. Additional open space acreage will be seriously disturbed or lost due to oil field remediation and construction grading activity.



OTHER PUBLIC AGENCY APPROVALS

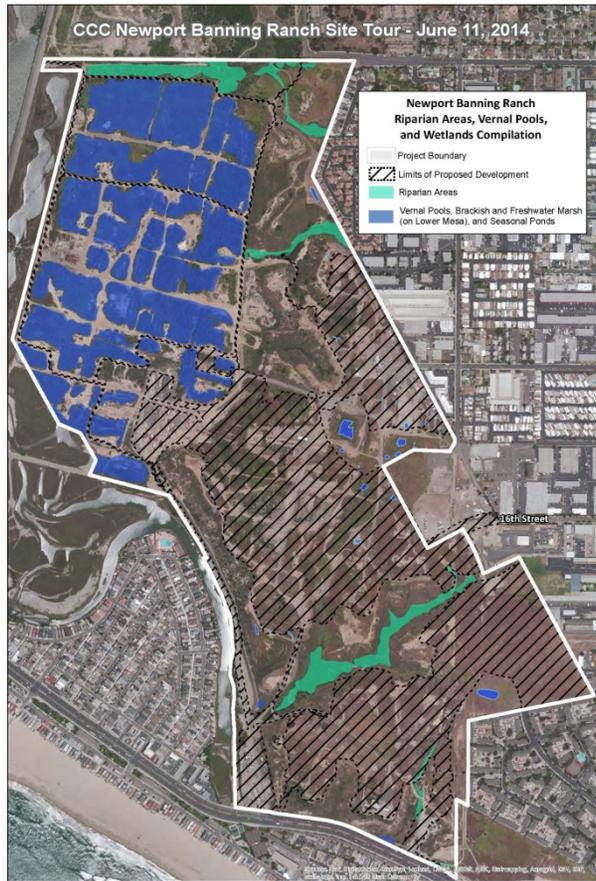
- U.S. Fish and Wildlife Service (USFWS) – Section 7 Consultation
- California Department of Fish and Wildlife (CDFW) – Section 1602 Permit
- Regional Water Quality Control Board – Section 401 Permit
- U.S. Army Corps of Engineers (USACE) – Section 404 Permit
- State of California Department of Conservation, Department of Oil, Gas and Geothermal Resources (DOGGR) – oil field abandonment
- Orange County Health Care Agency – Remedial Action Plan for oil field abandonment
- The Local Agency Formation Commission (LAFCO) – annexation
- Orange County Transportation Authority (OCTA) – public transit
- Newport-Mesa Unified School District - encroachment permit
- California Department of Transportation – encroachment permit – road expansion, intersections, pedestrian bridge



ENVIRONMENTALLY SENSITIVE HABITAT AREAS – ESHA

Environmentally Sensitive Habitat Areas (ESHA) are areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities. Coastal Act Section 30240 states that ESHA shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. Coastal Commission staff created maps illustrating valuable wetlands, vegetation and wildlife habitats based on compilations of qualified studies and surveys conducted over the past two decades.

Riparian, Vernal Pools and Wetlands Compilation

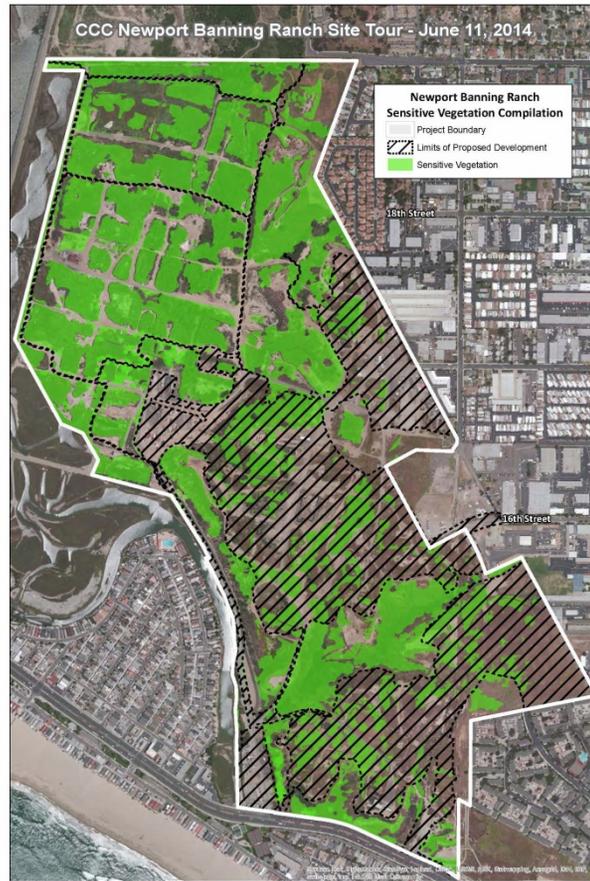


For Illustrative Purposes Only.
Sources: Dudek, GIA, ESRI.

0 250 500 1,000 Feet

05046/14

Sensitive Vegetation Compilation

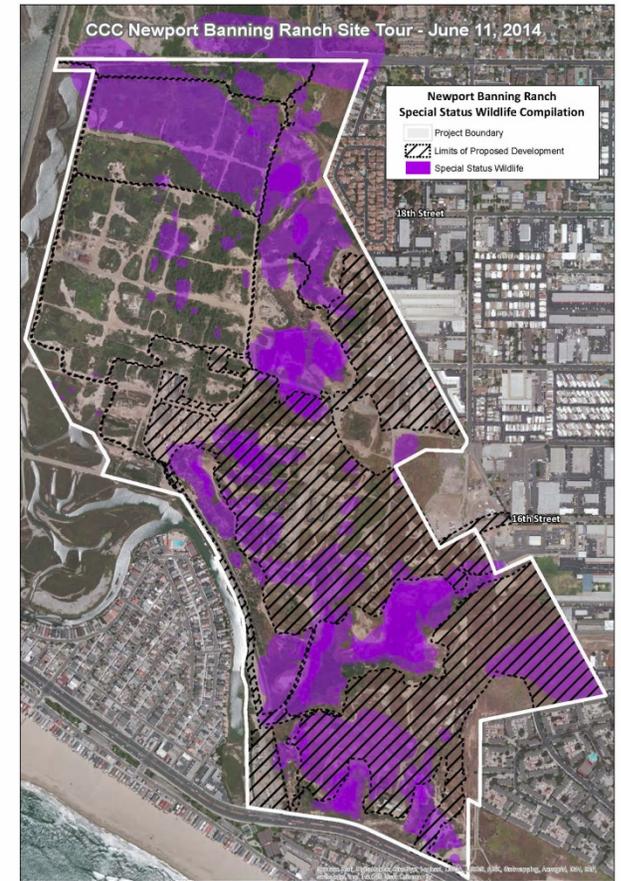


For Illustrative Purposes Only.
Sources: Dudek, GIA, ESRI.

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Special Status Wildlife Compilation

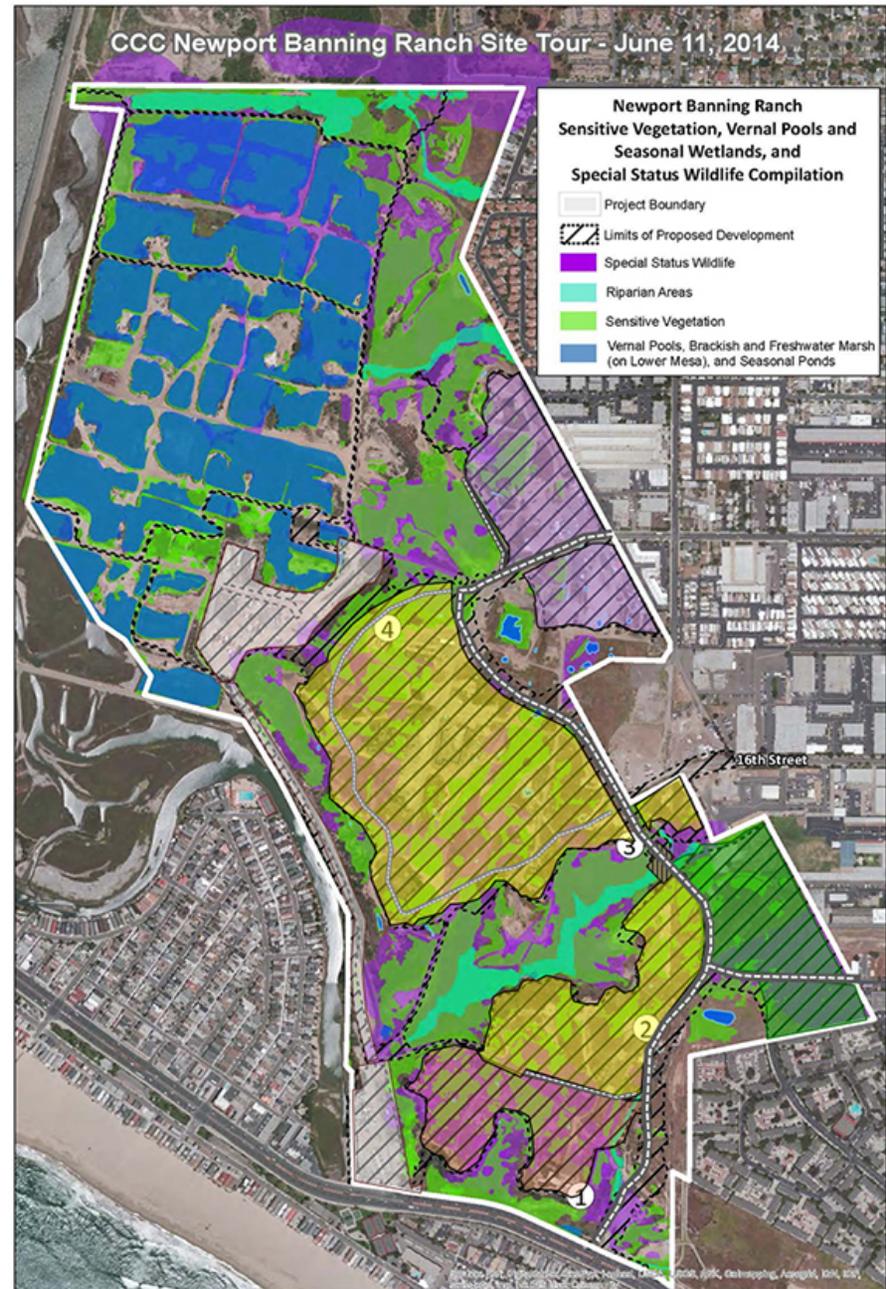


For Illustrative Purposes Only.
Sources: Dudek, Bon/Terra, ISA, PCR, GIA, ESRI.

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Development Footprint placed over Vegetation, Vernal Pools and Wetlands, and Special Status Wildlife Compilations



Development Footprint over Vegetation, Vernal Pools and Wetlands, and Special Status Wildlife Compilation

The Habitats

The site contains 45 vegetation types, including 20 types of coastal sage scrub; 9 types of pools, marshes and mudflats; 8 riparian types; and 8 grassland areas.

- The Lowland Wetlands
- Vernal Pools
- Rare Plant Communities
- Rare Listed Wildlife
- Riparian Habitat
- Coastal Sage Scrub and California Gnatcatcher Habitat
- Coastal Bluff Scrub and Maritime Succulent Scrub
- Burrowing Owl
- Purple Needle Grassland
- Federally Designated Critical Habitat as ESHA

“The coastal California gnatcatcher is an obligate, year-round resident of coastal sage scrub communities. Gnatcatchers in Southern California preferentially nest and feed in coastal scrub vegetation on mesas and gentle slopes that are characterized by varying abundances of California sunflower, California sagebrush, and California buckwheat.”

J.D. Engel memo

*ESHA and Wetland Determination for Banning Ranch p. 15
September 25, 2015*

USFWS Coastal California Gnatcatcher Critical Habitat

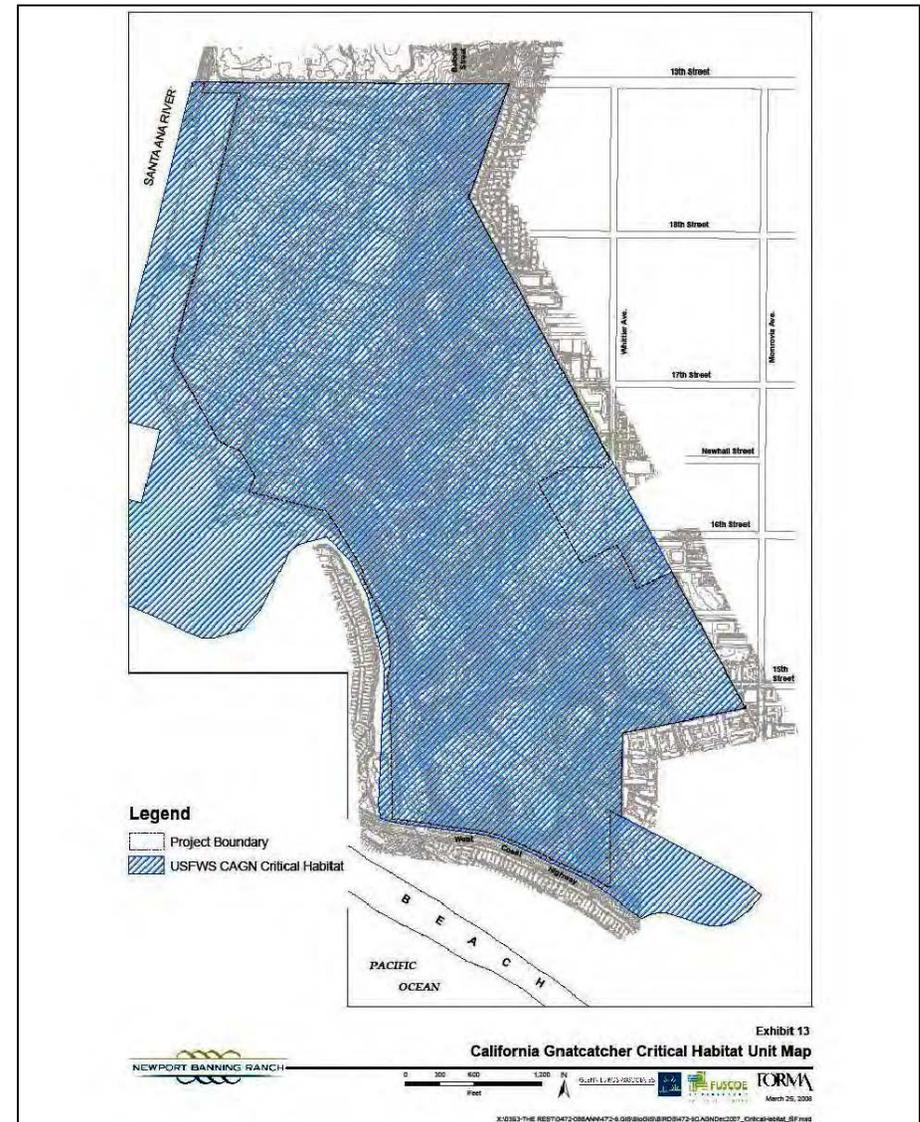


Figure 16. USFWS Coastal California Gnatcatcher Critical Habitat.

“The memo by Dr. Jonna Engle indicates that there is a **significant amount of ESHA** on the NBR site. Dr. Engel determined that areas of the site do rise to the level of environmentally sensitive habitat areas: *the site supports a surprising amount of native habitat that in turn supports native plant and animal species, much of which rises to the level of ESHA. The ESHA on the site includes California brittle brush sage scrub, southern coast bluff and maritime succulent scrub, purple needle grass grassland, and vernal pools. The California brittle brush sage scrub supports the federally threatened coastal California gnatcatcher who also forages within the southern coast bluff and maritime succulent scrub and surrounding habitats. The lowlands on the site support saltwater, brackish, and freshwater marsh wetlands and riparian habitat. The saltwater and brackish marsh support the federally and state endangered least Bell’s vireo. These habitats, which spread across the entire NBR site, are rare, and in turn support rare plants and animals, and Coastal Act sections 30233 and 30240 place important restrictions on the use of these areas.*”

Staff Report 5-13-032 (Newport Banning Ranch, LLC)
p. 35

Plant Community Environmentally Sensitive Habitat (ESHA) Boundary Determination for Banning Ranch

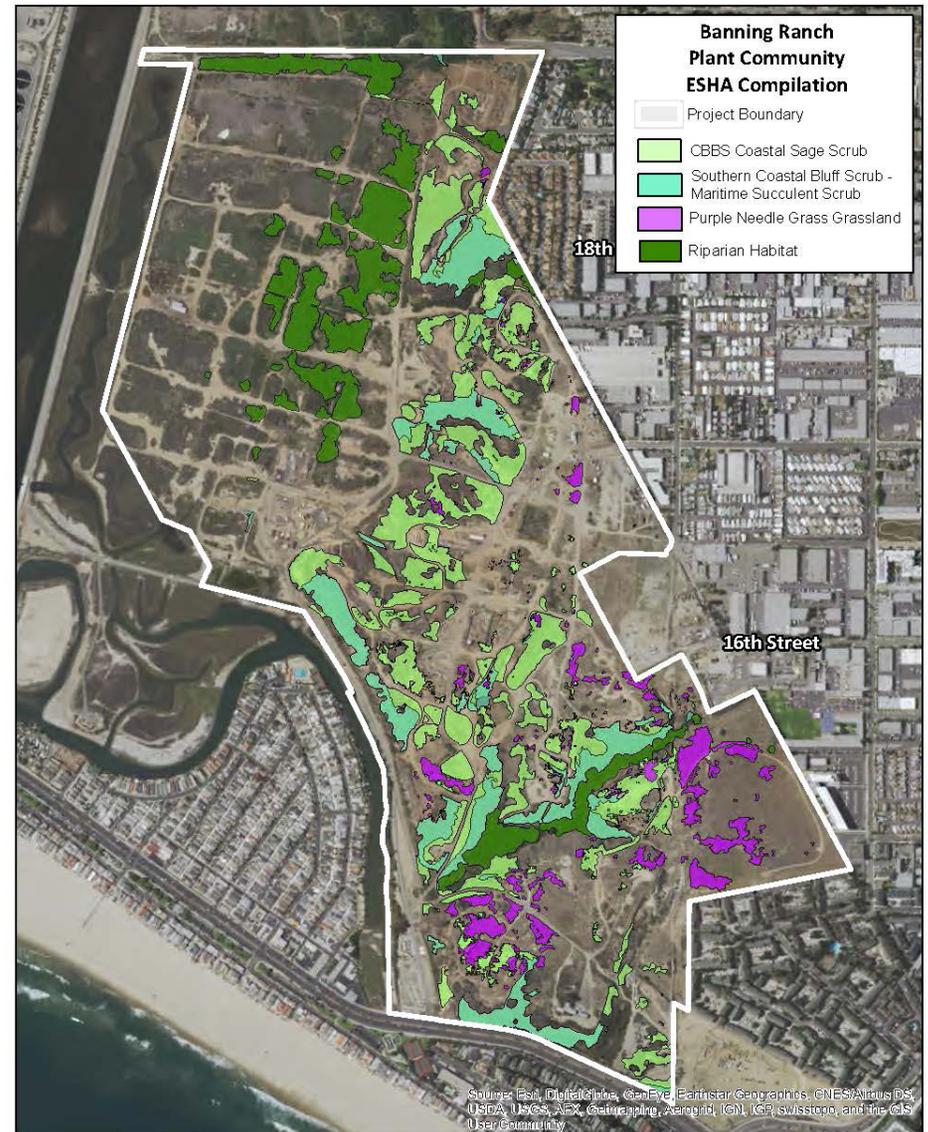


Figure 11. Plant Community Environmentally Sensitive Habitat (ESHA) Boundary Determination for Banning Ranch.

ORANGE COAST RIVER PARK and THE PACIFIC FLYWAY

Banning Ranch is the central element of the Orange Coast River Park. Banning Ranch is also an important link in the Pacific Flyway, contributing to the annual migrations of multiple avian species.



DEVELOPMENT IMPACTS ON ESHA

- A majority of the development footprint will significantly disrupt, disturb and/or destroy valuable ESHA habitat on Banning Ranch.
- **Vernal pools** containing Federally Endangered San Diego Fairy Shrimp, versatile fairy shrimp and other life forms will be impacted by remediation within the development footprint of the North Family Village.
- Remaining **vernal pools** will be impacted by oil field abandonment and remediation activities and are within the proposed development footprint.
- **Purple Needle Grass** - Almost all of the PNG on the site is within the footprint of the abandonment and remediation activities and development plan. A small patch of PNG is proposed to be created to mitigate for the complete loss of the grasslands.
- **Riparian** - The North-South Arroyo is proposed to be completely filled and graded and developed with the North Family Village. Multiple impacts to riparian habitat scattered across the site would result from the abandonment and remediation activities and the development plan.
- The **riparian** corridor in the far southeast of the site contains valuable riparian habitat that would be impacted by the proposed Bluff Road connecting the development site to PCH. **Coastal sage scrub** habitat would also have to be removed to accommodate the Bluff Road connection to PCH.

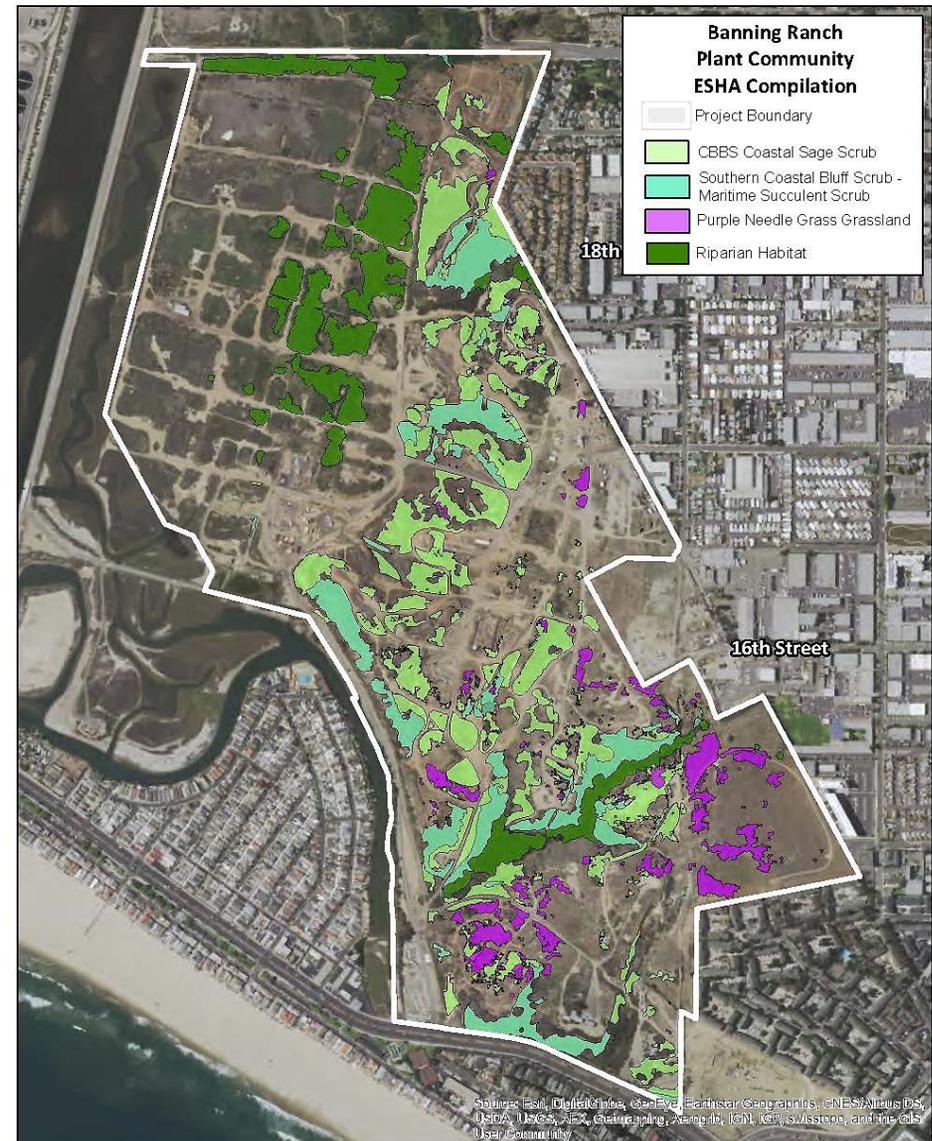
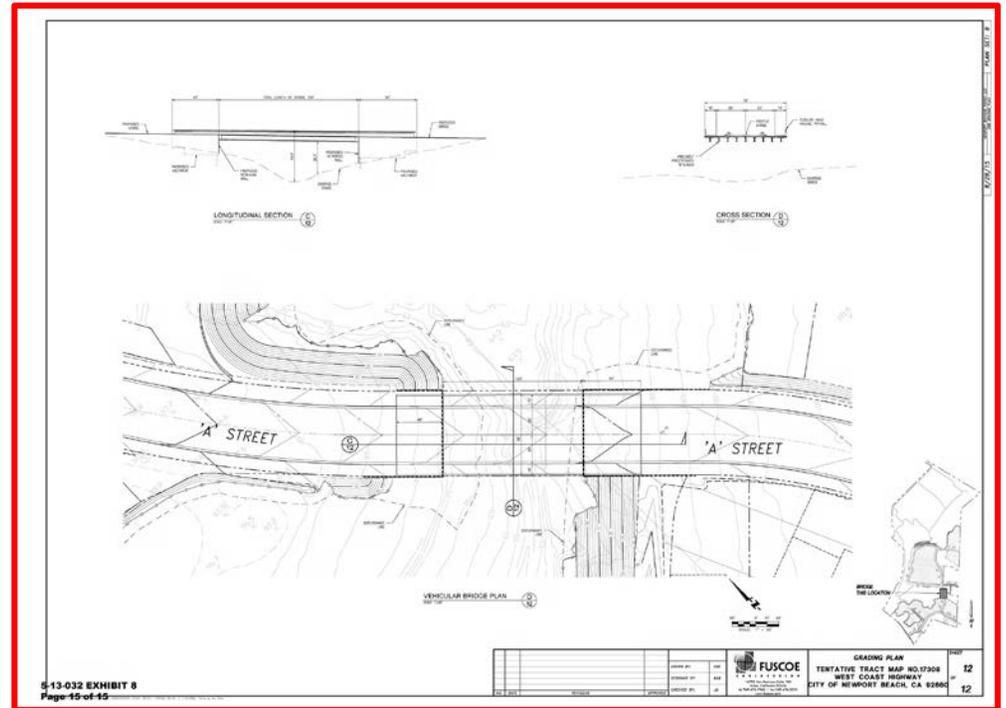


Figure 11. Plant Community Environmentally Sensitive Habitat (ESHA) Boundary Determination for Banning Ranch.

- The Bluff Road **bridge** spanning the Southern Arroyo would have bridge supports that would impact the riparian habitat in the arroyo.



ESHA and Wetlands with 100 Foot Buffers

California Gnatcatcher prefers Coastal Sage Scrub areas on the mesa; CSS and the other scrub communities, including southern coastal scrub and maritime succulent scrub, would be significantly impacted by the development plan.

- **Buffers around ESHA , wetlands and vernal pools are required under the Coastal Act – 100-foot buffers are recommended by Dr. Jonna Engel around ESHA, and vernal pools.**

The project is inconsistent with policies to minimize impacts to ESHA. The project is inconsistent with section 30240. Dr. Engel determined that the burrowing owl, and CAGN habitat, the vernal pools, the scrub communities, and native grasslands all rise to the level of ESHA. The proposed project would have significant impacts on ESHA for the abandonment and remediation activities, by grading for proposed housing and commercial development, and on resource dependent uses. The proposed project cannot be approved under Coastal Act Section 30240 and must be denied.

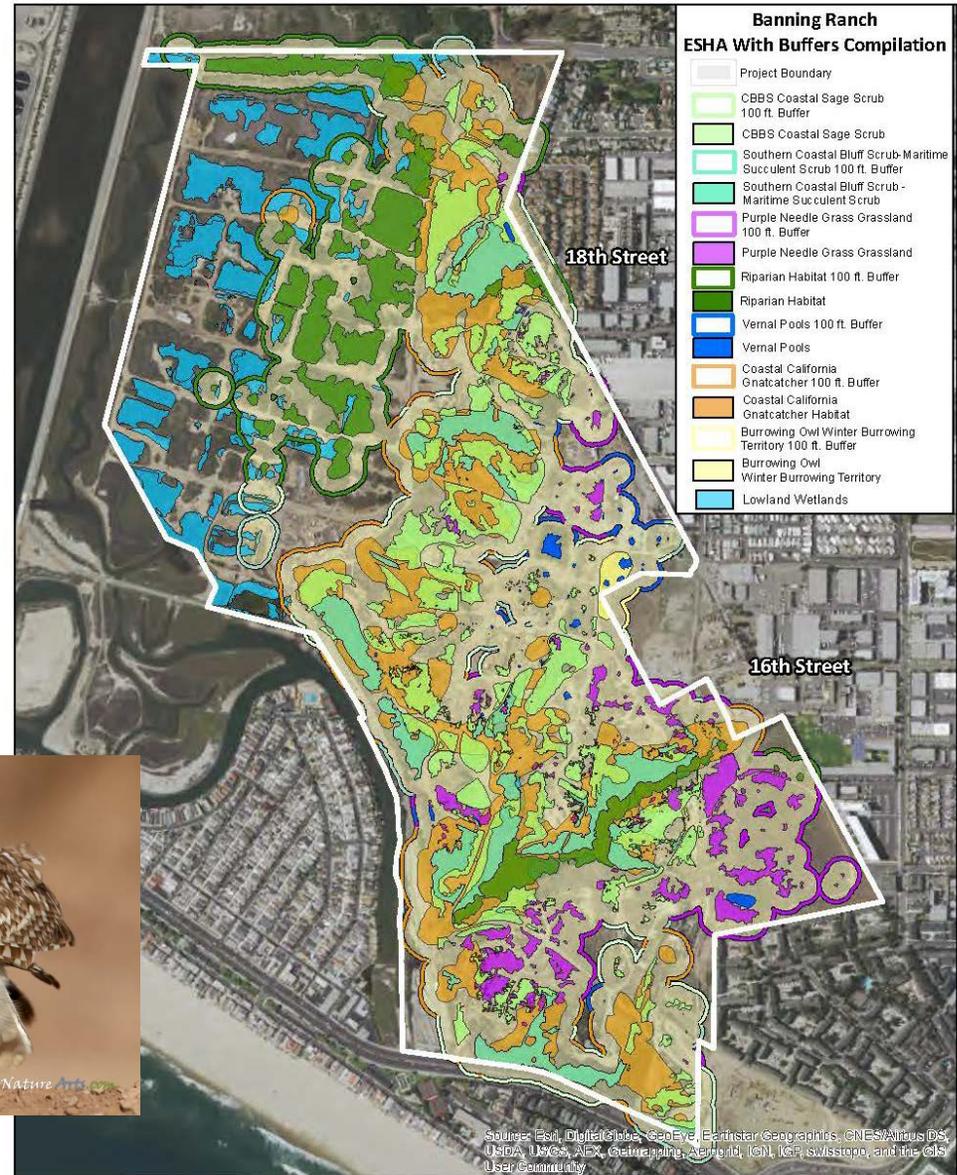


Figure 51. Banning Ranch ESHA and Wetlands with 100 Foot Buffers.



For Illustrative Purposes Only. Source: DudekI, ESRI.

DSM 9/25/15

WATER QUALITY

The location of the proposed water quality basin in the lowlands is inconsistent with Coastal Act Section 30233, requiring the protection of wetlands. A minimum of 100-foot buffers around the designated wetlands on the site is required.

The development plan as a whole, for which the above described water quality systems are designed, is not consistent with the protection of vernal pools and wetlands, is inconsistent with Sections 30231, 30233, and 30255 of the Coastal Act. Therefore, the proposed development project must be denied.

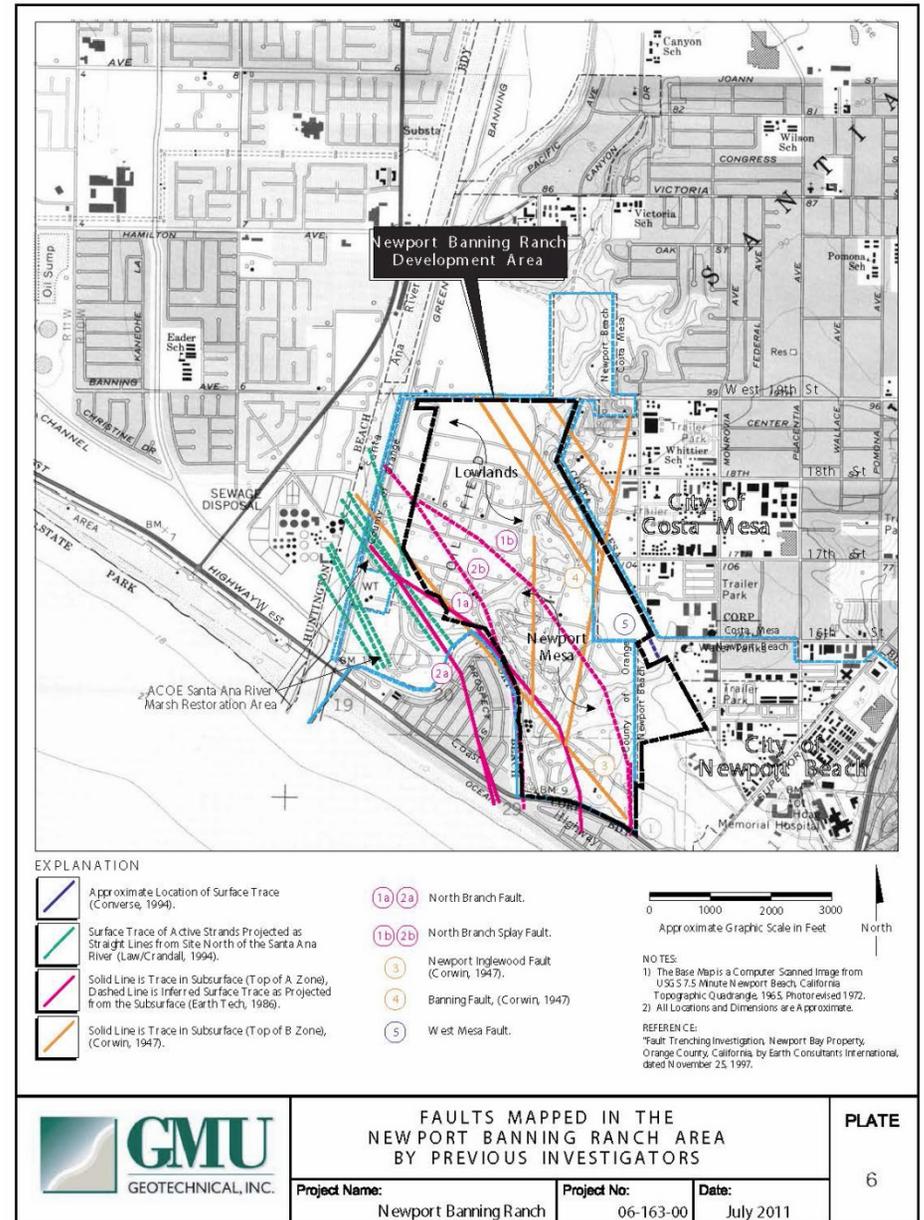
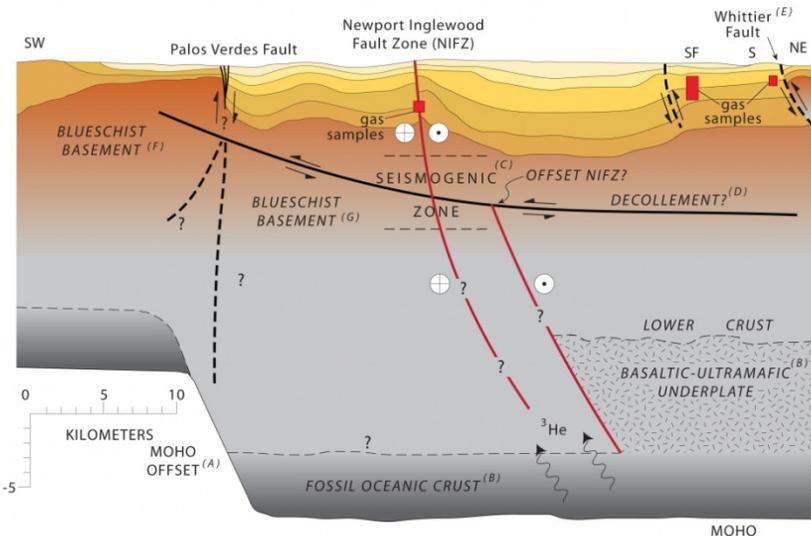


HAZARDS - SEISMIC

Two distinct zones of faulting were identified within the site. The main active trace of the Newport-Inglewood fault is less than 1 mile from the site and the Palos Verdes fault is within 11 miles from the site. The above-mentioned faults are capable of generating significant ground shaking at the site. Converse Consultants (1994) discovered a second active fault on the site called the "West Mesa Fault." This fault traverses the NBR site.

The West Mesa Fault and the Newport-Inglewood fault system should be considered **likely sources for future earthquakes** that would generate strong ground motions at the site. In addition, **surface rupture at the site is possible** along the West Mesa Fault.

Several plays of the active Newport-Inglewood fault zone have been mapped across the site and in the site vicinity. Faults that break the ground surface during an earthquake can do considerable damage to structures built across them. Therefore, fault studies are typically designed to evaluate whether a fault is active. If a fault is deemed active, structures cannot be placed across the trace of the fault (Alquist-Priolo Earthquake Fault Zoning Act).



ARCHAEOLOGICAL RESOURCES

- Sedimentary deposits in coastal Orange County are considered to be some of the most important fossil-producing formations in the world (similar to the sites at Bolsa Chica).
- Eight prehistoric and three historic resources are recorded on the Project site, and five cultural resources studies have been conducted on the site. There have been 17 cultural resources investigations within a 1-mile radius of the site.
- The applicant proposes at CA-ORA-844B to remove the archaeological resources instead of capping due to costs.
- CA-ORA-839 would be impacted by soil remediation.
- CA-ORA-906 would be impacted by oil infrastructure removal. The applicant's plans do not include capping resources found during grading, including any human burials.
- The information provided in the application materials was not sufficient for complete assessment of potential impacts to archaeological resources. The application does not include a request for approval and implementation of an Archaeological Research Plan (ARP), nor did it include an after-the-fact request for approval for the archaeological testing and recovery that was conducted on the site through the EIR process.
- The two proposed mitigation measures (recovery and monitoring) are **not** consistent with the Coastal Act as there are other reasonable mitigation measures that are more protective of the existing resources. The proposed project results in avoidable impacts to cultural resources
- The project may be consistent with section 30222, but is inconsistent with Section 30210 which requires that the development of public recreational opportunities shall not be at the expense of the overuse of natural resources. The project's consistency with Section 30252 by providing adequate parking, cannot be determined with the information provided in the application. For all the reason listed above, the project is inconsistent with the above policies of the Coastal Act and **must be denied**.



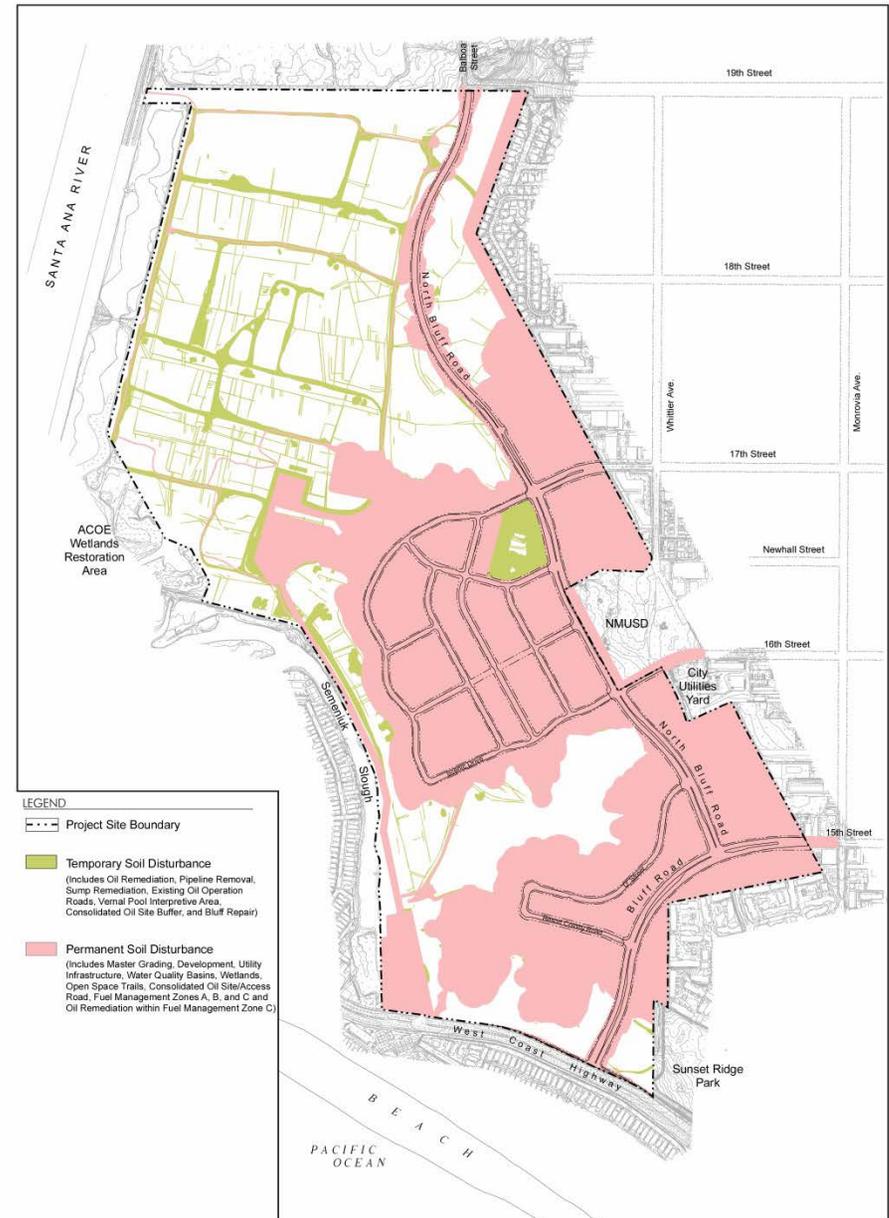
LOWER COST VISITOR SERVING FACILITIES (THE HOTEL)

- Lower cost defined as “an average daily rate of \$175 or more is considered high cost.”
- Rates for the Resort and the hostel were **not** proposed. Without proposed rates, the project’s consistency with Section 30213 of the Coastal act cannot be determined. Further, because the development of both the resort and the hostel would **permanently impact ESHA**, the proposed project is inconsistent with multiple policies of the Coastal Act and **must be denied**.



Soil Disturbance Map

- The primary concern relative to landform alteration is the grading that would result in the **filling of the North-South arroyo** and an unnamed gulch along the northwestern boundary of the proposed 'north village' residential development. This arroyo would be **completely filled** with crushed concrete, asphalt and soil from the oil field remediation project plus a layer of clean soil for ultimate development of the north village.
- The landform alterations would require grading that has impacts upon biological resources within the arroyos and upon the mesa, impacts upon habitat buffer areas, and adverse changes to wetlands hydrology.
- The Commission Staff finds that the proposed project **does not minimize landform alteration**. There is ample space on the project site where development could be accommodated without the substantial alteration of existing landscape features including arroyos. Therefore, the Commission Staff finds that the proposed project is inconsistent with Section 30251 of the Coastal Act and **must be denied**.



WATER SUPPLY

Section 30250 of the Coastal Act requires that new development be supported by adequate services, including water supply, waste water capacity, and adequate road circulation.

- The City of Newport Beach prepared a Water Supply Assessment (WSA) in 2010 based on data from the City's 2005 Urban Water Management Plan.
- Groundwater - The City obtains groundwater pumped from four wells owned and operated by the City and managed by Orange County Water District (OCWD.) The City's wells are located in the City of Fountain Valley, approximately five miles north of Newport Beach.
- Commission staff requested additional information from the applicant showing that the project could be developed with adequate water supply, given the extreme drought conditions and the time elapsed since the WSA was first drafted. On April 30, 2015, the Banning Ranch Conservancy (on file) submitted a comment letter to the Coastal Commission regarding the inadequacy of the 2010 Newport Banning Ranch WSA. The comment letter focused on two major points: 1) The WSA is outdated and should be invalid and 2) the region's water supply reliability and variability has changed significantly due to the current drought.
- A response letter from the Applicant posits that there is no legal requirement to update the WSA report, which at the time it was prepared, was required by law to utilize the most up-to-date data available. Instead of updating the WSA report, the response letter defends the original report, based on outdated 2005 data, despite the fact that newer, more accurate data is available. As a result, it is unknown if the development can adequately be supported by the water supply available without recent information.
- Ultimately, the response does not address the City's ability to meet the demand; regardless of whether the demand per capita increases or decreases. Based on the information submitted to date, it is unknown if the proposed development can be supported by adequate water supply. As such, the proposed project's consistency with Section 30250 of the Coastal Act cannot be determined and the project **must be denied**.



TAKINGS ANALYSIS

- The Commission finds that the project, as proposed, is inconsistent with the Chapter 3 policies of the Coastal Act identified in the staff report and must therefore be denied. The Commission also finds, however, that an alternative project could be approved on the portions of the site identified in the Alternatives section. Thus, a **denial is not a final adjudication by the Commission** of the potential for development on a portion of the project site, as it does not preclude the Applicant from applying for some other development or use of the site, such as a smaller-scale development project that proposes visitor serving, mixed-use commercial and residential uses and more carefully addresses the applicable Coastal Act policies.
- For decades, **the applicant has received and will continue to enjoy an economic benefit** from the property in the form of revenues (royalties) resulting from ongoing oil exploitation.
- There is no legal basis to support any takings claim by the applicant/owner of the property because **they are not entitled to violate the law to achieve any guaranteed or maximum return for any development of the property.**



ALTERNATIVES

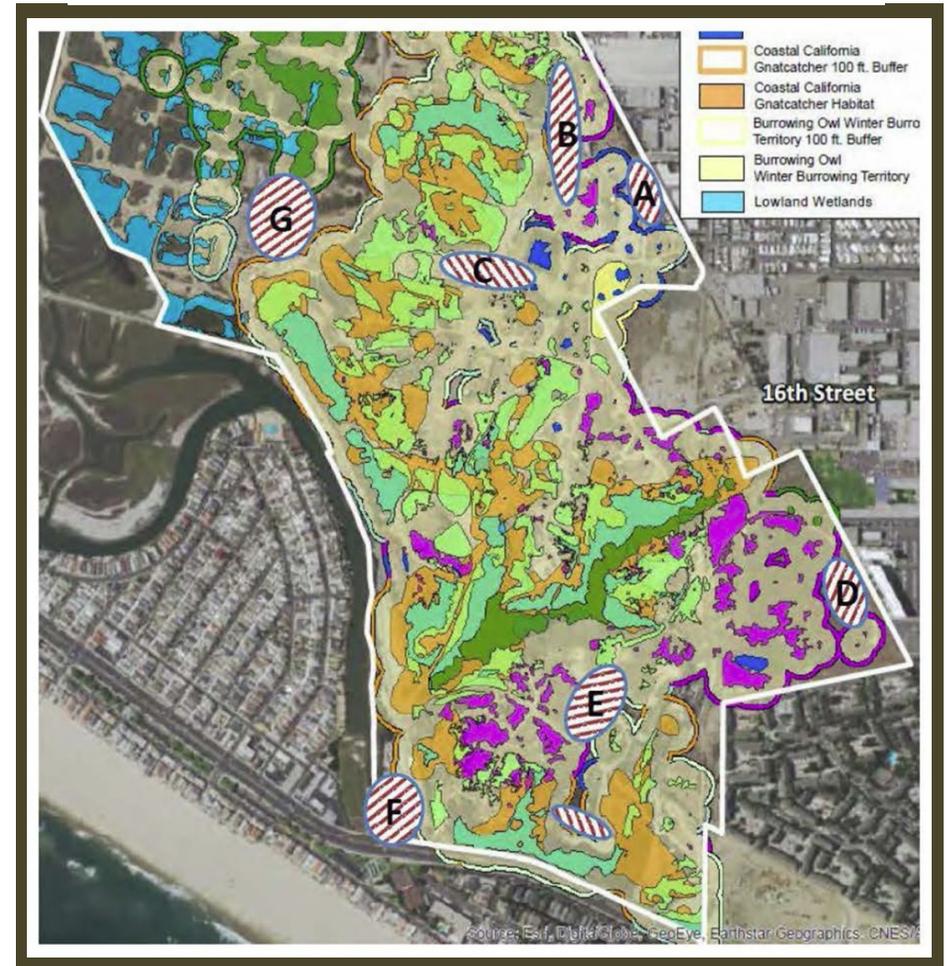
Commission Staff has identified nearly 19 acres of land that are potentially not constrained by wetlands, ESHA, their 100 foot buffers, or steep slopes, and that, with careful planning, would possibly be accessible without significant disruption to surrounding habitats.

In conjunction with the proposed consolidation of the oil operation, Staff projects that the NBR property could provide significant protected coastal habitat, open space and passive recreational use, and substantial development. The Commission Staff has also found that there are feasible alternatives which could avoid such impacts. Therefore, the Commission must **deny the project**.

Note that the Banning Ranch Conservancy does not endorse any or all of the potential areas for development as identified by the Staff. The Conservancy will require onsite study and delineation to determine the feasibility of these or any other sites for potential development.

AREA	ACREAGE
A	2
B	1.5
C	1.5
D	3
E	3.5
F	3
G	4.4
TOTAL Developable Areas	18.9

Developable Areas on Banning Ranch (as identified by Coastal Commission Staff)



UNPERMITTED DEVELOPMENT

Unpermitted development, which is described in Appendix A of the Coastal Commission Staff Report, occurred on the site prior to submission of this permit application, and the Commission has taken action to address the applicant's liability for all unpermitted development that was the subject of the 2015 Consent Orders, which is also further detailed in Appendix A. The 2015 Consent Orders did not resolve the Commission's claims against the oil operator, WNOG, for the alleged Coastal Act violations described in the 2015 Consent Orders. Staff is continuing discussions with WNOG during the stay in the litigation described in Appendix A to resolve their situation at the site.

Additionally, two other enforcement actions for this property have been processed with appropriate fines and remedial action taken in furtherance of the settlement of those Consent Orders.



LOCAL COASTAL PROGRAM

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal development permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms to Chapter 3 policies of the Coastal Act.

The City is in the process of creating an implementation plan for the Coastal Land Use Plan and certifying their LCP. **Approval of this project** under a coastal development permit **would effectively prejudice the ability of the local government to certify their LCP** because it is inconsistent with the policies of the Coastal Act and the City has expressed intent to annex the site in the future. Thus, pursuant to Section 30604(a) of the Coastal Act, the Commission must **deny the project**.



CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project is not the least environmentally damaging alternative. The EIR describes several alternatives for the project including Alternative B, Open Space and Park. Ultimately Alternative B was not proposed due to assumed economic restrictions, however under CEQA it is a less environmentally damaging alternative. Under Section 21080.5(d)(2)(A) of CEQA, the proposed project cannot be approved and cannot be issued a coastal development permit.



As explained above and as incorporated here by reference, the proposed project is inconsistent with Sections 30240, 30233, 23231, 32055, 30253, 30210, 30251 of the Coastal Act due to adverse impacts upon natural landforms, adverse impacts upon biological resources including wetlands and vernal pools; adverse visual impacts related to landform alteration and the project's consistency with 30252, 30213 and 30250 cannot be determine based on the information provided. The Commission Staff has also found that there are feasible alternatives which would avoid such impacts.

The Commission must **deny the project**.



MITIGATION PROJECT & THIRD-PARTY MITIGATION (from HCCMP)

The proposed Habitat Conservation and Conceptual Mitigation Plan (HCCMP) describes a 30-acre **Third Party “mitigation bank”** in the lowlands of the site. Within the lowlands, approximately 30 acres of the proposed Natural Open Space Preserve are proposed for designation as a third-party mitigation area to allow opportunities for additional habitat establishment, restoration and/or enhancement by parties other than the Applicant who require environmental mitigation, offsets, or other habitat sites within the region. In other words, the applicant performs no restoration and, instead, enhances their revenue by selling the wetlands to other developers to fulfill their mitigation needs.

The Applicant will, at least, complete clean up (i.e., oil facility removal and oilfield remediation activities) within the third-party mitigation area, which includes a plan to scrape the topsoil of the wetland to a depth of 5 feet. These clean-up activities will result in impacts to habitats (some disturbed) that must be subsequently mitigated pursuant to the proposed Mitigation Project.

As a part of any third-party mitigation, removal of existing exotic species should be required. Approximately 10.26 acres of exotic species within the third-party mitigation areas shall be removed as a condition of any third-party mitigation implementation.

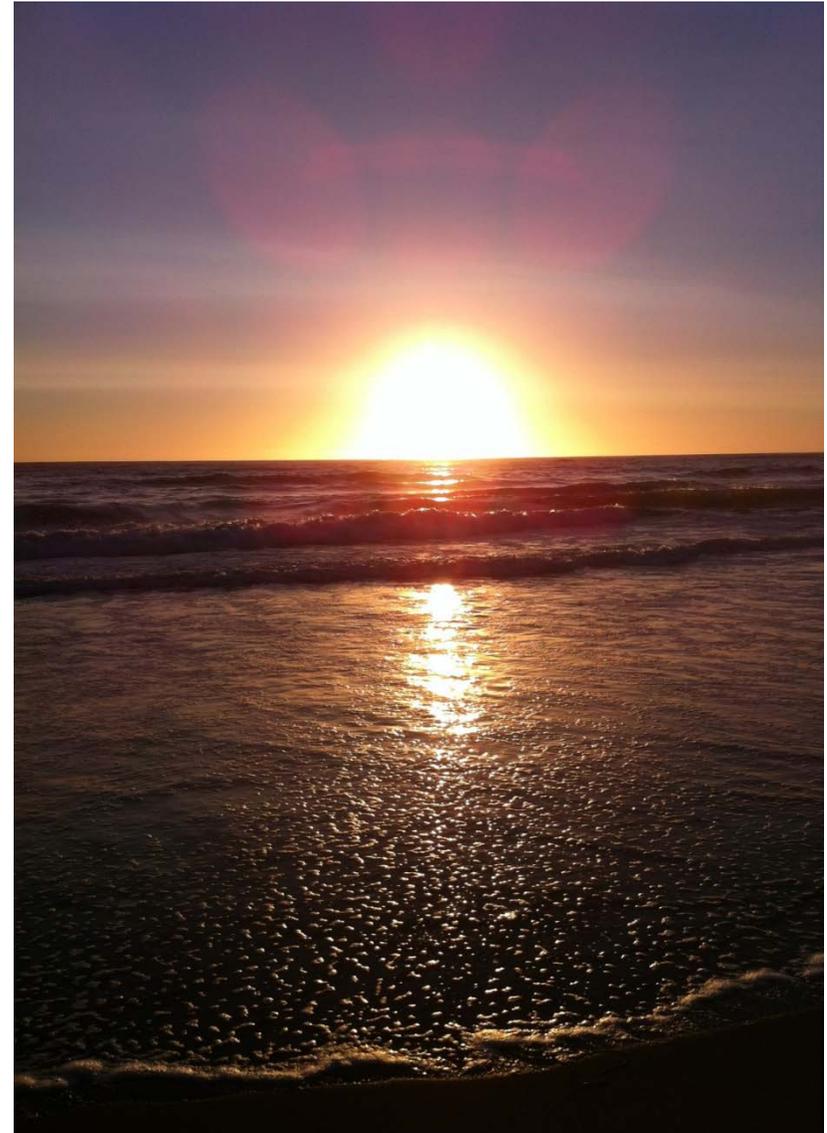
- **Note that the mitigation solution of moving one habitat over another – moving and burying - habitats doesn’t mitigate any habitats.**



THE APPLICANT'S CONSERVANCY

The applicant, NBR, founded its own conservancy, the Newport Banning Land Trust (NBLT). NBLT is the applicant's (NBR) organization. Most members of the NBLT board are, actually, the applicants.

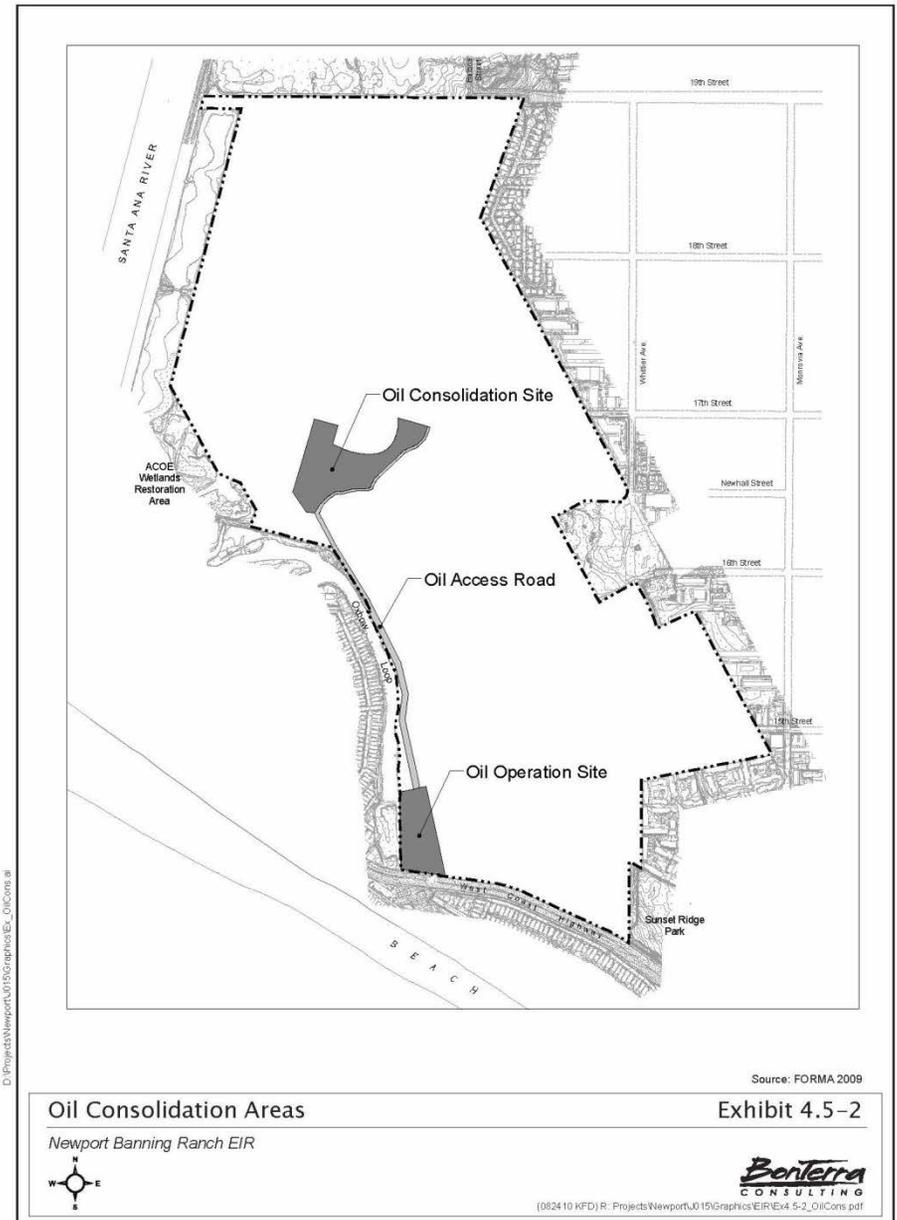
NBR presented NBLT a Memorandum of Understanding (MOU) that would require NBLT to assume stewardship responsibility for the Natural Open Space Preserve. The burden for funding for preservation of these open space areas would likely be passed to the Homeowners Association established for the proposed housing developments, not the applicant, even though they publicly maintain that they are providing funding.



SEGMENTATION OF PROJECT AND OIL FIELD CONSOLIDATION

- The formal application does not include the proposal to consolidate the existing surface oil facilities onto two sites totaling 16.7 acres. Plans for the Oil Consolidation Zones and Oil Operations need to be submitted. There is no environmental analysis, precluding identification of base environmental conditions, no identification of impacts to the environment or human populations and no mitigation or avoidance strategies. Likewise, there is no information provided as to the extent of oil operations, the methodologies to be employed for oil extraction activities and potential impacts therefrom.
- The consolidation will not occur without the development project and the project cannot be built without the consolidation. They are one and the same project. By law, they cannot be segmented into two supposedly unrelated projects. From the beginning of the application process in the City of Newport Beach through the Coastal Commission proceedings, consolidation has been a key element of the development proposal. The only change has been to rename the consolidation zones to “remainder areas” in some documents, while the vast majority of documents retain the more accurate original name.

Oil Consolidation Areas



BANNING RANCH IS NOT A WASTELAND DEVOID OF LIFE

In spite of the ongoing four year drought, many of the areas mapped 'disturbed' in 2012, now support a high cover of native shrubs, especially California sunflower (also known as California brittle brush).

*J.D. Engel memo
ESHA and Wetland Determination for Banning Ranch p. 13
September 25, 2015*

The California brittle brush, commonly known as Encelia (*encelia californica*), is recognized by its bright yellow "sunflower-like" appearance. A base plant, a progenitor of coastal sage scrub habitat, Encelia is found in profusion throughout the mesas on Banning Ranch and is easily viewed, especially following any rain event. Encelia serves as the basic nesting and foraging species for the threatened coastal California gnatcatcher.



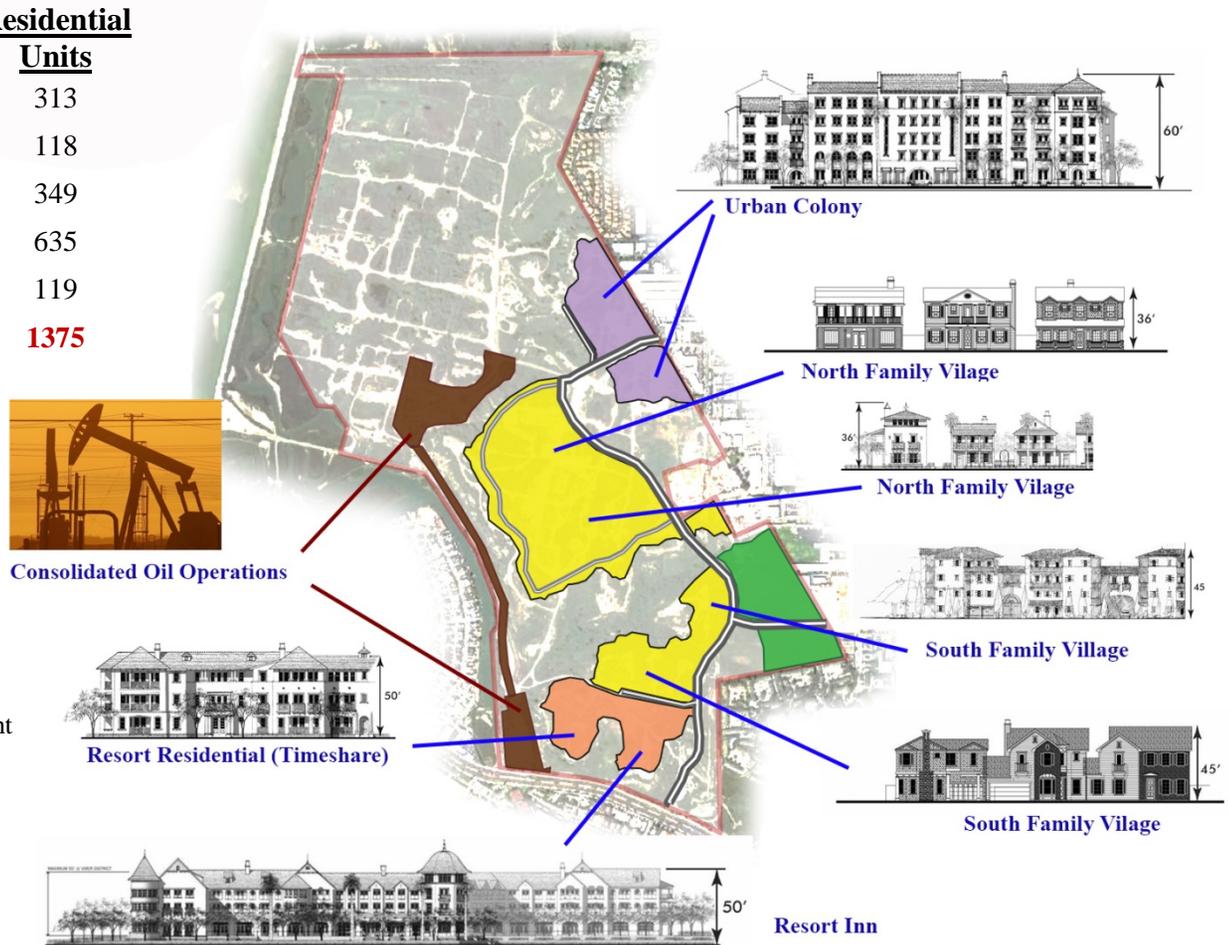
NBR IS DISPROPORTIONATELY OVERSIZED

Compared to the last five large coastal developments approved in Orange County, the proposed Newport Banning Ranch projects dwarfs the others in terms of the sheer number of residential units and the density, especially considering the acreages involved in other projects. Additionally, the other projects did not include a resort hotel complex and all the retail/commercial space proposed at Banning.

Development of OC's last large coastal properties

<u>Site</u>	<u>Acres</u>	<u>Residential Units</u>
Marblehead (San Clemente)	248	313
Dana Point Headlands	121	118
Bolsa Chica	2000	349
Crystal Cove (Newport Coast)	980	635
Castaways (Newport Beach)	133	119
Newport Banning Ranch	412	1375

The Urban Colony



Project Development Building Heights

*Note that the applicant is now proposing a maximum height of 40 ft in the South Family Village.

MISSING – INFORMATION, STUDIES, CCC STAFF REQUESTED INFO

- Plans for the Oil Consolidation Zones and Oil Operations need to be submitted. There is no environmental analysis, precluding identification of base environmental conditions, no identification of impacts to the environment or human populations and no mitigation or avoidance strategies. The consolidation will not occur without the development project and the project cannot be built without the consolidation. They are one and the same project. By law, they cannot be segmented into two supposedly unrelated projects.
- Commission staff requested additional information from the applicant showing that the project could be developed with adequate water supply, given the extreme drought conditions and the time elapsed since the Water Supply Assessment was first drafted. On April 30, 2015, the Banning Ranch Conservancy (on file) submitted a comment letter to the Coastal Commission regarding the inadequacy of the 2010 Newport Banning Ranch WSA. The comment letter focused on two major points: 1) The WSA is outdated and should be invalid and 2) the region's water supply reliability and variability has changed significantly due to the current drought. More current data is available and the WSA needs to be revised.
- The Vernal Pool Interpretive Area Park would be planted with native grasslands providing a vegetated buffer between the vernal pool restoration complex and adjacent development. It appears on the site plan that the interpretative vernal pool complex may contain a pedestrian footpath around, and in some cases through, the vernal pools. Construction plans for the vernal pool complex have not been provided.
- A protocol Wet Season Survey must be performed on all potential vernal pool features to determine their functioning as a vernal pool or coastal wetland or neither, thereby determining the level of protection required for them.
- And many more ...

