

The DRP biologist finds that the Draft EIR is responsive to the ERB comments of meeting of November 2012. ERB comments from the November 2012 meeting are listed below, followed by a summary relevant Draft EIR content:

- **Trancas Canyon supports a population of rainbow trout (*Oncorhynchus mykiss irideus*) and has been identified as a potential watershed for the re-establishment of a passage for anadromous steelhead (CalTrout 2006). Provide a discussion of habitat values and identify passage impediments for steelhead within the project site. Incorporate habitat buffers and features to improve steelhead passage in the design of the project. The passage concept is available from CDFG; a public meeting to discuss the passage will be held in Ventura in January 2013.**

The Draft EIR concludes that the southern steelhead is absent from the project site but is potentially present at Trancas Lagoon. The Draft EIR cites the absolute natural limit to upstream steelhead migration identified by CalTrout in 2006 as a 3 meter high natural waterfall, approximately 1 mile downstream of the project site. Therefore, the Draft EIR concludes that any *Oncorhynchus mykiss* occurring within reaches of Trancas Creek above this barrier would be non-anadromous rainbow trout. Currently, rainbow trout are not expected within the golf course ponds; they are precluded from occurring due to the presence of non-native predators; and the golf-course ponds do not provide suitable habitat for rainbow trout reproduction. Habitat improvement along Trancas Creek is recommended by CalTrout in their 2006 report.

The Draft EIR addresses potential impacts to steelhead and rainbow trout arising from pollutants and barriers to movement. The proposed project includes dewatering of the golf course ponds that would result in the eradication on site of non-native fishes and crayfish. The project would also be monitored subsequent to pond re-filling to ensure that these non-native predators are not re-established at the site. Proposed mitigation measures with potential to benefit native fishes in Trancas Creek include implementation of a Pest and Invasive Species Management Plan and a Habitat Mitigation and Monitoring Program.

- **Conduct surveys for shoulderband snails (*Helminthoglypta* spp.), special-status fish, Coast Range newt (*Taricha torosa*), western pond turtle (*Emys marmorata*), and bats. Provide discussions of their potential presence on site and project related impacts.**

In addition to the general inventory of vascular plants and wildlife, the Draft EIR lists the following surveys as having been conducted on the project site:

- Butterflies—April 15, 2009
- California newt—March 26 and June 3, 2013
- Western pond turtle—between June 13 and June 22 and again between mid-July to mid-August, 2013
- Delineation of jurisdictional waters, wetlands, and riparian habitat within the Project limits and areas approximately 100 feet upstream—October and December 2012
- Least Bell's vireo and other riparian avifauna—May 13, May 23, June 5, June 15, June 25, and July 5, July 15, and July 26, 2006 between the hours of 6:00 a.m. and 11:00 a.m. (i.e., per USFWS protocol).

Although surveys were not conducted for shoulderband snails or bats, they are presumed to be present on site and mitigation is incorporated for the avoidance of impacts to these species during construction. Also, although focused surveys for fishes weren't conducted, the fish fauna was characterized during pond and newt surveys and special-status fishes were not observed; habitat characteristics are also not appropriate for native fish due to the presence of non-native predators and isolation from suitable stream reaches downstream of the project.

- **Discuss the suitability of the site for reintroduction of California red-legged frog (*Rana draytonii*).**

The potential for red-legged frog to utilize the site is acknowledged, subsequent to the removal of non-native predators.

- **Develop a crayfish and bullfrog eradication plan for the project.**

This plan is part of the project and is described in Appendix D of the Draft EIR.

- **Incorporate project design features to ensure detention of storm water complies with current RWQCB requirements.**

The project is subject to the permitting authority of the RWQCB, and a Water Quality Certification shall be obtained prior to the issuance of a grading permit.

- **Incorporate a permanent trail easement in the project design.**

The project does not include dedication of a trail easement; however, over 500 acres of the site will be deeded to the National Parks Service. This dedication of land will extinguish development rights and allow for public access to that portion of the property. As title holder to the conserved portion of the site, National Parks will have the option of establishing trails if they desire.

The DRP biologist has reviewed the Draft EIR, has provided comments and revisions to the preparer which have been incorporated, and he finds that mitigation measures and project design features are consistent with the conservation goals of the Local Coastal Plan. Therefore, the DRP biologist recommends that ERB find the project consistent with the LCP.