

## Exhibit 6: LSA Memos



LSA ASSOCIATES, INC.  
20 EXECUTIVE PARK, SUITE 200  
IRVINE, CALIFORNIA 92614

949.553.0666 TEL  
949.553.8076 FAX

BERKELEY  
CARLSBAD

FRESNO  
PALM SPRINGS  
PT. RICHMOND

RIVERSIDE  
ROCKLIN  
SAN LUIS OBISPO

August 11, 2015

Timothy Shaw, Contract Project Manager  
Orange County Parks Design Division  
13042 Old Myford Road  
Irvine, CA 92602

Subject: Revised Discussion of the Consistency of Proposed Improvements to Aliso and Wood Canyons Wilderness Park with the RMP and MND documents – Biology

Dear Mr. Shaw:

LSA Associates, Inc. (LSA) submits this letter to you and the Orange County Parks Design Division (OC Parks) to address biological resources concerns pertaining to the implementation of proposed improvements to the Aliso and Wood Canyons Wilderness Park (AWCWP) and whether these proposed improvements are consistent with the *Initial Study/Mitigated Negative Declaration Resource Management Plan for Aliso and Wood Canyons Wilderness Park* (MND; IP 08-2009) and the *Resource Management Plan for Aliso and Wood Canyons Wilderness Park* (RMP; OC Parks and LSA 2009). In particular, this letter addresses changes from the building designs that have occurred after LSA's letter of February 21, 2013. The park entry improvements include trail connections, parking improvements, and visitor gathering points and circulation improvements. This letter focuses on the changes to the three buildings, which include a visitor center/ranger office (2,614 square feet [sf]), an office for non-profit entities (1,349 sf), and a multipurpose education and meeting building (1,064 sf) (see attached). The total area of these three buildings is approximately 500 sf greater than with the conceptual design.

As discussed in the RMP and MND, much of the park is within the Central/Coastal Orange County Subregion Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP), and preparation of the RMP was a requirement of the County's participation in the NCCP/HCP. The purpose of the RMP is to identify allowable uses in the park and provide for the management of the resources in conjunction with the public recreational use. Because one of the primary purposes of the RMP is the management of resources to maximize habitat value within the AWCWP, there are generally no substantial impacts to biological resources associated with the RMP. Nevertheless, the public uses have the potential to adversely affect some resources (i.e., construction of new trails and visitor-serving facilities could impact valuable habitat). Implementation of RMP goals and strategies will ensure that the locations for any of these facilities would be carefully chosen so as to minimize impacts to special-status species and their habitats. Avoidance of sensitive species is a primary consideration in the siting of future recreational trails, trailheads, and interpretive facilities. The closure/relocation and restoration of certain trails and facilities would benefit special-status species by restoring habitat in areas where trails are unauthorized and providing new trails in areas where impacts will be minimized.

However, impacts and activities within the NCCP/HCP are restricted and regulated, including policies from NCCP/HCP Guidelines in Section 5.8.5 that guide the siting and construction of permitted recreational facilities within the Reserve System. The following measures from the MND will implement these guidelines, and comply with other regulatory requirements:

## Exhibit 6: LSA Memos

LSA ASSOCIATES, INC.

- The United States Army Corps of Engineers (Corps), USFWS, CDFG, and Nature Reserve of Orange County (NROC) shall be consulted regarding the final design and location of the project to mitigate and minimize impacts on coastal sage scrub (CSS), oak woodland, and wetland riparian habitat and associated species.
- Temporary impacts to CSS shall require revegetation in the form of hydroseeding in accordance with the requirements of the NCCP/HCP.
- All known locations of sensitive bird species associated with CSS and riparian habitats within 100 feet of the grading limits shall be mapped on the grading plan to facilitate avoidance during construction.
- The project biologist shall ensure that the contractor has roped or fenced the grading boundaries prior to initiation of vegetation removal.
- The USFWS and CDFG shall be notified seven days prior to clearing of CSS.
- Preconstruction meetings shall be conducted with the biological monitor, construction supervisors, and equipment operators to ensure maximum practicable adherence to the HMMP measures.
- Vegetation removal shall not occur during the primary nesting season for local birds (February 15-August 30, consistent with NCCP/HCP requirements) where riparian habitat, wetlands, and CSS or associated subtypes occur on or adjacent to the proposed project. If vegetation removal must occur in these areas during this period, then preconstruction surveys shall be conducted in the appropriate habitats within and up to 100 feet from the project boundary to identify nesting birds within or adjacent to the project boundary, a 100-foot buffer is required until either the young have fledged or the nest becomes inactive. In addition, a preconstruction survey shall be conducted within the project boundary as well as a 100-foot buffer for sensitive species.
- Clearing of vegetation within or immediately adjacent to CSS and riparian habitats mapped within the study areas shall be monitored by a qualified biologist. Flushing or capture and relocation of any NCCP-identified or other sensitive species found within this vegetation shall also be conducted by the monitor during these activities.

Assuming that all appropriate requirements listed above are fulfilled, the currently proposed entry area buildings described in the first paragraph are consistent with the RMP and MND.

Sincerely,

**LSA ASSOCIATES, INC.**



Art Homrighausen  
Principal/Biologist

Attachment A: Proposed Phase 2 Campus Plan

Exhibit 6: LSA Memos

LSA ASSOCIATES, INC.  
AUGUST 2015

REVISED DISCUSSION OF THE CONSISTENCY OF PROPOSED IMPROVEMENTS  
ALISO AND WOOD CANYONS WILDERNESS PARK  
BIOLOGY

---

**ATTACHMENT A**

**PROPOSED PHASE 2 CAMPUS PLAN**



PROPOSED PHASE 2 CAMPUS PLAN WITH ALL THREE BUILDINGS

## Exhibit 6: LSA Memos



LSA ASSOCIATES, INC.  
20 EXECUTIVE PARK, SUITE 200  
IRVINE, CALIFORNIA 92614

949.553.0666 TEL  
949.553.8076 FAX

BERKELEY  
CARLSBAD

FRESNO  
PALM SPRINGS  
PT. RICHMOND

RIVERSIDE  
ROCKLIN  
SAN LUIS OBISPO

August 11, 2015

Timothy Shaw, Contract Project Manager  
Orange County Parks Design Division  
13042 Old Myford Road  
Irvine, CA 92602

**Subject:** Revised Discussion of the Consistency of Proposed Improvements to Aliso and Wood Canyons Wilderness Park with the RMP and MND documents – Archaeology and Scientific Resources

Dear Mr. Shaw:

LSA Associates, Inc. (LSA) submits this letter to you and the Orange County Parks Design Division (OC Parks) to address cultural resources concerns pertaining to the implementation of proposed improvements to the Aliso and Wood Canyons Wilderness Park (AWCWP) and whether these proposed improvements are consistent with the *Initial Study/Mitigated Negative Declaration Resource Management Plan for Aliso and Wood Canyons Wilderness Park* (MND; IP 08-2009) and the *Resource Management Plan for Aliso and Wood Canyons Wilderness Park* (RMP; OC Parks and LSA 2009). In particular, this letter addresses changes from the building designs that have occurred after LSA's letter of April 5, 2013. The park entry improvements include trail connections, parking improvements, and visitor gathering points and circulation improvements. This letter focuses on the changes to the three buildings, which include a visitor center/ranger office (2,614 square feet [sf]), an office for non-profit entities (1,349 sf), and a multipurpose education and meeting building (1,064 sf) (see attached). The total area of these three buildings is approximately 500 sf greater than with the conceptual design.

### Archaeology

As discussed in the RMP, a 1990 records search identified 51 previously recorded cultural resources (both historic and prehistoric) within park boundaries. As stated on page 201, paragraph 4, "Information potential for prehistoric settlement and subsistence activities is high . . . Impacts could be considered significant even on sites that have already been investigated to some degree. . . . all sites within the AWCWP are considered highly significant, with preservation as a priority. The locations of cultural resources are a major factor in the placement of both park facilities and their improvements." Thus, it is well known and understood by AWCWP staff that there are numerous cultural resources within AWCWP, and they must be considered and addressed prior to each improvement project.

Per the RMP, Section 10.3, Resource Investigation and Evaluation:

If a known significant site will undergo direct impacts, an Orange County certified archaeologist shall be consulted to both recommend and implement mitigation

measures that are appropriate for the impacts to these sites. Preference shall be given to avoidance of impacts through project design to eliminate site disruption. Impact avoidance may be paired with other measures to protect the resource such as capping, fencing, or planting native vegetation that would be difficult to penetrate.

When the significance of an archaeological resource is unknown, prior to any grading or development in the vicinity of the site that will undergo direct impacts from park development, an Orange County certified archaeologist shall conduct test level excavations at those sites. The archaeologist shall provide recommendations for further action based on the findings of test level excavations.

An Orange County certified archaeologist shall provide a Cultural Resources Survey of the area within the AWCWP prior to activities that may impact sites, both known and unknown.

Any AWCWP project that involves earth disturbing activities in culturally rich soils, including construction activities, should not occur unless a trained archaeologist is present to monitor the work.

The implementations of measures cited above by the AWCWP will successfully avoid and/or reduce impacts to cultural resources to a level below significance.

### **Paleontology**

Paleontological resources represent a significant feature of AWCWP. Six geological formations and four nonformational units are exposed within AWCWP and all but one of these have produced fossils. Four formations are rated as having very high scientific significance, and one is rated as having high significance. Several of these formations are in the vicinity of the proposed entry improvements.

Per the RMP, Section 11.2 Periodic Locality Prospecting And Salvage Collecting:

Prior to any proposed ground disturbing activities within the AWCWP, whether routine or emergency trail maintenance, biological revegetation efforts, or construction of new facilities, a paleontological assessment survey of the proposed construction area should be completed under the direction of a County-certified paleontologist to identify both the rock types present in the area and the potential for significant fossil resources to be discovered. If significant fossils are identified during the survey, these should be scientifically salvaged prior to initiation of construction activities. A County-certified paleontologist should develop a paleontological resources impact mitigation program (PRIMP) consistent with guidelines developed by the Society of Vertebrate Paleontologists (SVP 1995) to direct resource monitoring of excavations in order to collect and properly curate any fossils that may be discovered during the ground-disturbing activities. Standards for the assessment survey and monitoring program can be found in the County Standard Conditions of Approval A05 (Survey), A06 (Salvage), and A07 (Monitoring).

LSA ASSOCIATES, INC.

In addition, per Mitigation Measure 4.11-2 in the MND:

Prior to the approval of the project plans and specifications for development of individual projects recommended in the RMP by the Orange County Board of Supervisors, the Orange County Parks Director, or designee, shall confirm that the plans and specifications stipulate that a County-certified paleontologist will be retained to monitor excavation activities. The paleontologist shall be present at the pregrade conference and shall establish, in cooperation with the project engineer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If the paleontological resources are found to be significant, the monitor shall determine appropriate actions, in cooperation with the project engineer, for exploration and/or salvage.

**Conclusion**

Assuming that prior to finalization of the improvement plans (listed in paragraph one of this letter) all appropriate requirements listed above are fulfilled, the currently proposed entry area buildings are consistent with the RMP and MND.

Sincerely,

**LSA ASSOCIATES, INC.**



Deborah McLean  
Principal/Archaeologist

Attachment A: Proposed Phase 2 Campus Plan

Exhibit 6: LSA Memos

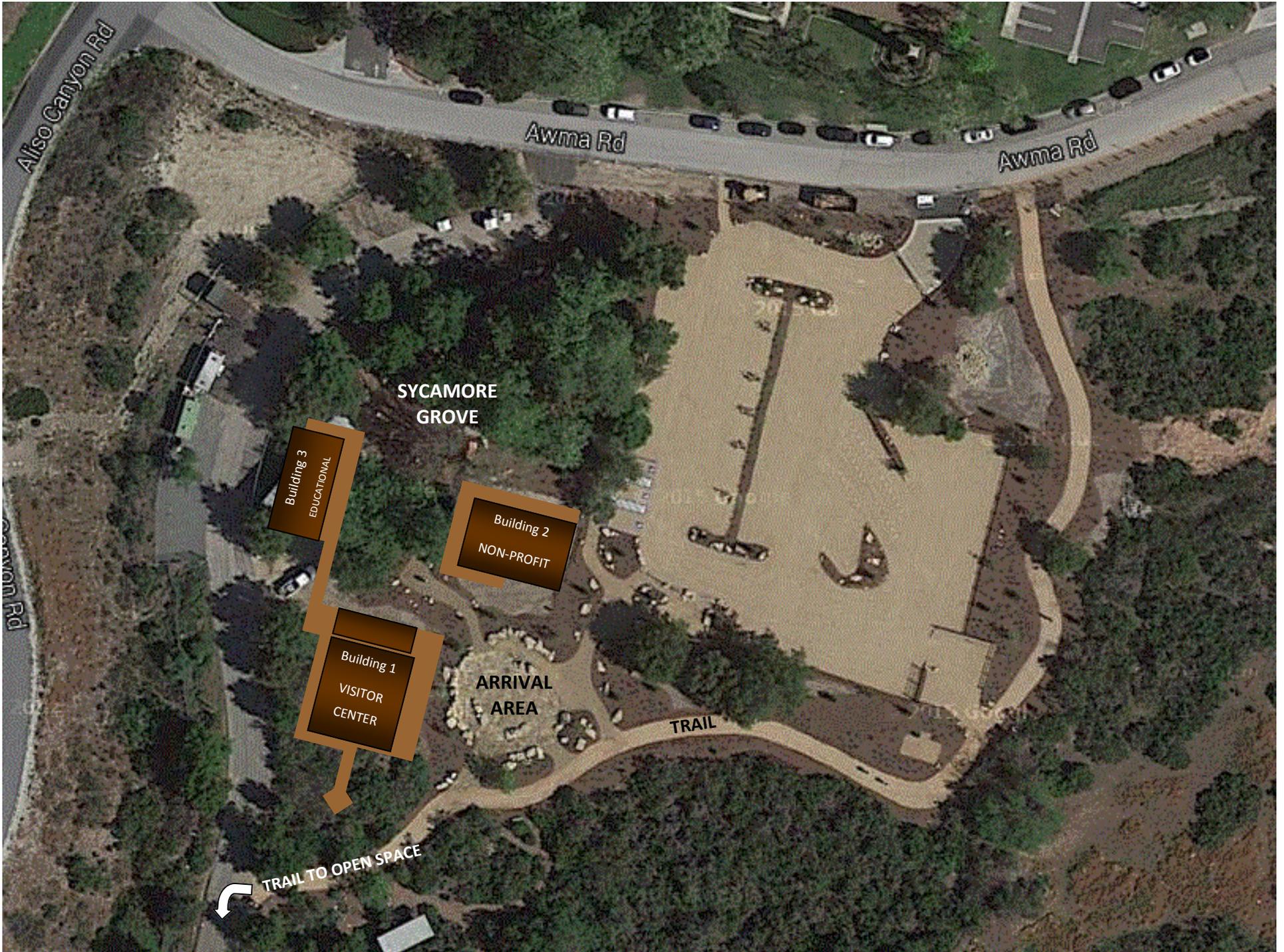
LSA ASSOCIATES, INC.  
AUGUST 2015

REVISED DISCUSSION OF THE CONSISTENCY OF PROPOSED IMPROVEMENTS  
ALISO AND WOOD CANYONS WILDERNESS PARK  
ARCHAEOLOGY AND SCIENTIFIC RESOURCES

---

**ATTACHMENT A**

**PROPOSED PHASE 2 CAMPUS PLAN**



PROPOSED PHASE 2 CAMPUS PLAN WITH ALL THREE BUILDINGS