

Appendix A: Notice of Preparation and Comment Letters

NOTICE OF PREPARATION

Program Environmental Impact Report

Diamond Bar General Plan Update

Date May 31, 2018

To Reviewing Agencies, Interested Parties, and Organizations

Subject Notice of Preparation of a Draft Environmental Impact Report for the Diamond Bar General Plan Update and Climate Action Plan, and Scheduling of a Scoping Meeting on June 21, 2018

The City of Diamond Bar (City) is preparing an update to the City's General Plan and a Climate Action Plan (CAP), together referred to as the Proposed Project. The City has determined that a comprehensive Environmental Impact Report (EIR) will be necessary to evaluate environmental impacts of the Proposed Project, pursuant to the California Environmental Quality Act (CEQA). In compliance with CEQA, the City will be the Lead Agency and will prepare the EIR. Attached are the project description, location maps, and preliminary identification of the potential environmental issues to be analyzed.

The City requests comments and guidance on the scope and content of the EIR from responsible and trustee agencies, and interested public agencies, organizations, and individuals (CEQA Guidelines §15082). If your agency is a responsible agency as defined by Section 15381 of the CEQA Guidelines, your agency may use the environmental documents prepared by the City when considering permits or approvals for action regarding the project.

Public Review Period: Thursday, June 7 to Friday July 6 2018

Responses and Comments: The City requests your careful review and consideration of this notice and invites input from interested agencies, persons, and organizations regarding the preparation of the EIR. Comments and responses to this notice must be submitted in writing to the Lead Agency Contact by the close of business on Friday, July 6, 2018. If applicable, please indicate a contact person for your agency or organization in your response.

Scoping Meeting: A public scoping meeting will be conducted on June 21, 2018 to collect oral comments from agencies and members of the public regarding the scope and content of the EIR.

Scoping Meeting on the Diamond Bar General Plan and Climate Action Plan EIR

June 21, 2018 | 6:00 to 7:00 PM
Windmill Room, Diamond Bar City Hall
21810 Copley Drive
Diamond Bar, CA 91765

For project information, please visit www.diamondbargp.com/

Lead Agency Contact: If you have any questions regarding this NOP or the scoping meeting, please contact Grace Lee at the City of Diamond Bar.

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive, Diamond Bar, CA 91765
E-mail: GLee@DiamondBarCA.Gov
Phone: (909) 839-7032

I Project Contact Information

Project Title	Diamond Bar General Plan Update
Lead Agency Name	City of Diamond Bar
Contact Person	Grace Lee, Senior Planner
Address	City of Diamond Bar 21810 Copley Drive, Diamond Bar, CA 91765
Phone	(909) 839-7032
E-mail	GLee@DiamondBarCA.Gov
Project Sponsor Name and Address (same as lead agency)	City of Diamond Bar, Planning Division 21810 Copley Drive, Diamond Bar, CA 91765

2 Project Location

REGIONAL CONTEXT

The City of Diamond Bar is located at the far eastern edge of the San Gabriel Valley, within 30 miles driving distance of the cities of Los Angeles, Riverside, and Irvine. The western edge of the city lies at the intersection of State Route (SR) 57 and SR-60, with SR-57 connecting to Interstate 10 (I-10) 1.5 miles to the north, and SR-60 connecting to SR-71 1.75 miles to the east. The city is connected to regional rail service via the Industry Metrolink Station, located on Diamond Bar's northern border with the City of Industry. The regional setting is depicted in Figure 1.

PLANNING AREA

The General Plan Planning Area (Planning Area), shown in Figure 2, is defined as the land area addressed by the General Plan update. The Planning Area encompasses 13,039 acres, of which 73 percent is in the city limits and the remaining 27 percent is in the Sphere of Influence (SOI). It is bounded by the City of Pomona to the northeast/north/northwest, the City of Industry to the west/northwest, unincorporated Los Angeles County (Rowland Heights) to the west, unincorporated Orange County and the City of Brea to the south, and the City of Chino Hills to the east. While Diamond Bar does not have jurisdiction in areas outside of its city limits, any land located outside of a city's jurisdictional boundaries that bears relation to its planning must be considered in the city's general plan (California Government Code Section 65300). This typically includes a city's SOI and may also include additional land.

3 Project Description

The proposed Environmental Impact Report (EIR) will cover the Diamond Bar General Plan update and Climate Action Plan, referred to as the Proposed Project. The following section provides background information on the Proposed Project.

CITY OF DIAMOND BAR GENERAL PLAN UPDATE

In late 2016, the City of Diamond Bar initiated a multi-year collaborative process to comprehensively update its General Plan, which dates back to 1995 and does not necessarily reflect current conditions or community priorities. The update process will allow the community to establish priorities regarding land use, parks and recreation, public gathering spaces, mobility, and other issues. The General Plan update will include all State-required elements other than the Housing Element, which was last updated in January 2014 (per California Department of Housing and Community Development requirements) and is not part of the Proposed Project.

Steps in the planning process have been completed include community visioning, existing conditions research, land use alternatives analysis, and preparation of a "Preferred Plan" land use map. The Public Review Draft General Plan is anticipated to be released in the winter of 2019. More information about the Diamond Bar General Plan Update, as well as documentation of the process thus far, can be found on the Diamond Bar General Plan Update website at www.diamondbargp.com.

Purpose

The General Plan is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over a 20- to 30-year period. City decisionmakers (e.g., City Council and Planning Commission), rely on the General Plan as a basis for making decisions on matters such as land use and the provision of public facilities (e.g., roads, parks, community buildings, etc.). It is also a policy document that guides decisions related to protecting, enhancing, and providing the resources and amenities valued by the community.

Objectives

An ongoing public participation process has provided opportunities for public input to the Diamond Bar General Plan Update. Early in the planning process, the community was engaged through citywide surveys, community workshops, General Plan Advisory Committee meetings and Planning Commission and City Council study sessions to establish priorities for future planning, resulting in the following vision statement and guiding principles for the General Plan Update that have been adopted by the City Council.

1. **Protect and preserve existing neighborhoods.** Community members have indicated a strong interest in protecting and preserving the character of existing neighborhoods.
2. **Expand options for local dining and retail.** Expanding options for local dining, retail and entertainment in Diamond Bar was another common theme throughout the community

engagement process. This objective was often coupled with that of creating a downtown or town center in Diamond Bar, where new dining, retail and entertainment options could be concentrated.

3. **Protect and enhance environmental quality.** Open space and conservation were characteristics cited by many as defining elements of the character of Diamond Bar. Community members expressed a desire to protect and enhance environmental resources and quality.
4. **Provide more spaces for public recreation and community gathering.** Providing more spaces for public recreation and community gathering was another community priority, with an emphasis on meeting the needs of youth and seniors in Diamond Bar.
5. **Improve mobility.** Addressing traffic and congestion recurred as a priority throughout the community engagement process.

General Plan Update Contents

The General Plan Update will address the following topics, meeting the requirements for general plan contents under California Government Code §65302, as well as certain optional topics the City wishes to include in the General Plan update. The Housing Element was adopted in January 2014 and is not part of this update. The following is a working list of the elements; it should be noted that the General Plan is in the process of development, and elements may be reorganized as the General Plan development evolves.

- **Land Use and Economic Development.** This element will direct the location, form, and intensity of land uses in the Planning Area. It will also include an Economic Development component that provides policy direction for fostering development and revitalization.
- **Circulation.** This element will address issues related to transportation. It will respond to the California Complete Streets Act of 2008 by planning for a balanced, multimodal transportation system that meets the needs of all users of roadways, including motorists, pedestrians, bicyclists, children, seniors, persons with disabilities, public transportation users, and movers of commercial goods.
- **Resource Conservation.** This element will establish goals and policies for the conservation of natural resources in Diamond Bar. Per State requirements, this element will address open space; biological resources; hydrology and water quality; air quality, greenhouse gas emission reduction, and climate change adaptation.
- **Public Services and Facilities.** This element will provide a policy framework for the City to manage infrastructure and services. The element will address topics such as police and fire services; parks and recreational facilities and programs; schools; and water, wastewater, stormwater, and solid waste systems.
- **Public Safety Element.** This element will identify the natural and man-made public health and safety hazards that exist within the Planning Area and establish policies to mitigate their potential impacts. Per State requirements, the element will address seismic and geologic hazards, flooding, hazardous materials, fire hazards, emergency services, neighborhood safety, and noise.

- **Community Character and Placemaking.** This element will establish a policy framework for the urban form and character of Diamond Bar as a whole, as well as focus on the visions and opportunities for key change areas.
- **Community Health and Sustainability.** This element will focus on various aspects of public health and sustainability, which may include food access, active transportation, public health indicators, economic opportunity, and access to services.

Planning Horizon

The Diamond Bar General Plan Update uses a horizon year of 2040. State law specifies that general plans take a long-term perspective; therefore, in order to effectively set goals and policies that can guide strategic decision-making, most general plans look ahead approximately 20 years. The horizon year of 2040 does not signify an “end point.” Rather, it represents a reasonable range in which to plan comprehensively for the city’s next phase of growth, change, and investment.

Land Use Designations and Framework

Land use designations establish the intended uses and density of development in certain areas throughout the Planning Area. The General Plan land use diagram shows the location of designated land uses within the Planning Area. The land use diagram for the Proposed Project is shown in Figure 3.

The proposed land use framework is based on the current General Plan classifications and diagram, with most land use classifications being carried over and the majority of the diagram remaining unchanged. Revisions to the land use diagram proposed in the General Plan Update target four change areas in the city: the commercial area at the intersection of Diamond Bar Boulevard and Golden Springs Drive, which would be redesignated to allow for a mixed-use Town Center; a portion of northern Diamond Bar Boulevard that would be redesignated as a mixed-use neighborhood; the area surrounding the Industry Metrolink Station, which would be designated for transit-oriented mixed use; and the portion of the Diamond Bar Golf Course south of Grand Avenue, which would be designated for community-serving mixed use in the event that the County chooses to cease golf course operations there. Proposed revisions to the land use diagram and designations are as follows.

- **New Land Use Designations.** The following new designations are being considered in the updated General Plan. Note that General Plan policies will further delineate permitted and desired mixes of uses.
 - **Town Center Mixed Use (TC-MU).** TC-MU allows a mix of uses to promote the creation of a vibrant mixed-use Town Center on the east and west sides of Diamond Bar Boulevard, extending from Golden Springs Drive to SR 60. This land use designation would emphasize community-serving and destination retail, dining, and entertainment uses.
 - **Neighborhood Mixed Use (N-MU).** N-MU would allow a mix of residential and neighborhood-serving retail and service uses to promote revitalization of the stretch of Diamond Bar Boulevard between the 57/60 interchange and Highland Valley Road.

- **Transit Oriented Mixed Use (TOD-MU).** TOD-MU would allow high-density housing and supporting commercial uses for the creation of a walkable, transit-oriented mixed-use neighborhood. The proposed TOD-MU area is located south of the City of Industry Metrolink station.
- **Community Core Overlay.** The Community Core Overlay would be applied to the portion of the Diamond Bar Golf Course south of Grand Avenue. The underlying Golf Course designation permits continued operation of the present golf course use. Were the golf course to cease operation, this overlay designation would allow and encourage a mix of uses with an emphasis on destination and specialty retail, dining, and entertainment uses.

CLIMATE ACTION PLAN

A CAP is a comprehensive plan for addressing a community's greenhouse gas (GHG) emissions. A CAP, or similar strategy, can serve as a mitigation strategy under CEQA for GHG/climate change impacts associated with a proposed project. The proposed CAP will be developed concurrently with the General Plan Update, reflecting the City's proposed land use and transportation strategy and GHG implications of various proposed General Plan's goals and policies

Purpose

The proposed CAP is intended to reinforce the City's commitment to reducing GHG emissions, and demonstrate how the City will comply with State of California's GHG emission reduction standards. As a Qualified GHG Reduction Strategy, the CAP will also enable streamlined environmental review of future development projects, in accordance with CEQA. Specifically, the CAP will quantify existing and projected GHG emissions in the Planning Area resulting from activities within the Planning Area and the region through horizon year 2040 and will include GHG emissions reduction targets for the year 2040. The CAP will also contain any actions required to ensure that targets are met. The CAP's GHG emission targets will be based on meeting the goals set in Executive Order S-3-05 and Senate Bill 32, following the CAP guidelines established in the 2017 Scoping Plan.

Objectives

Section 15183.5 of the CEQA Guidelines permits lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level through a plan to reduce GHG gas emissions. In doing so, the lead agency allows later project-specific environmental documents to tier from and/or incorporate by reference that existing programmatic review. The proposed CAP's objectives are to meet CEQA requirements (Section 15183.5) to allow for future tiering and streamlining of the analysis of GHG emissions, which state that a plan for the reduction of GHG emissions should:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;

- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- Be adopted in a public process following environmental review.

4 Environmental Impact Report

The EIR will analyze the potential environmental consequences of adopting the proposed Diamond Bar General Plan Update and Climate Action Plan (the Proposed Project). It will discuss how goals, policies, and implementing actions of the Proposed Project may affect the environment, identify significant impacts, and recommend measures to mitigate those impacts. It will also evaluate the cumulative impacts and potential growth-inducing impacts of the Proposed Project. The EIR will consider the environmental impacts of various alternatives developed during the planning process, including the “No Project Alternative” (projected outcomes based on continued implementation of the existing General Plan [1995]), and identify an environmentally superior alternative.

The environmental assessment will utilize the most current guidelines for CEQA and for each issue area. The EIR will be prepared to take full advantage of CEQA streamlining and tiering opportunities for future projects, whether in accordance with provisions of SB 375, or other tiering and exemption provisions in CEQA. Community members can provide input at two different phases in the EIR process: in response to this Notice of Preparation (where comments are solicited on the scope of the EIR), and to the Draft EIR itself when that document is released (when comments are solicited on the analysis and conclusions of the EIR).

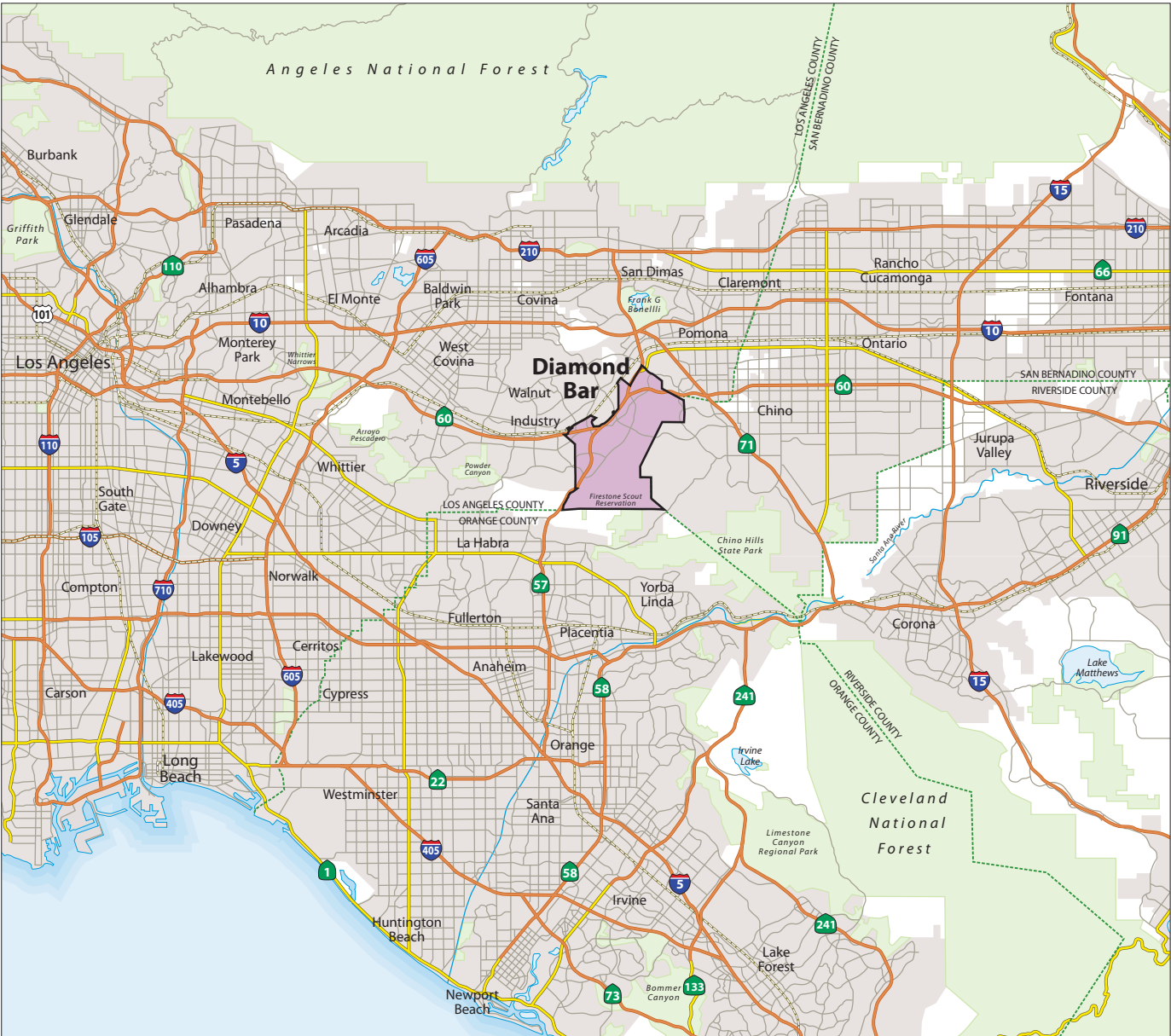
The environmental factors listed below have the potential to be affected by the proposed project and will be analyzed in the EIR:

- | | |
|--|--|
| • Aesthetics | • Hydrology, Drainage, and Water Quality |
| • Air Quality | • Land Use, Population, and Housing |
| • Biological Resources | • Noise and Vibration |
| • Cultural, Tribal, and Historic Resources | • Public Facilities and Recreation |
| • Energy, Climate Change, and Greenhouse Gas Emissions | • Traffic and Transportation |
| • Geology, Soils and Seismicity | • Utilities and Service Systems |
| • Hazards and Hazardous Materials | |

CEQA allows environmental effects for which there is no likelihood of a significant impact to be “scoped out” of the EIR analysis. Based on characteristics of the planning area, the following two

topic areas will be included in the Effects Found Not to Be Significant section of the EIR: agriculture and forestry, and mineral resources. No agricultural activities or activities related to mineral resources occur within the Planning Area boundaries, and none of the properties are designated for agricultural use or as relevant for farmland or mineral resources by the State of California. Full documentation of the factual basis for this determination will be included in the EIR. Unless specific comments are received during the NOP public comment period that indicate a potential for the project to result in significant impacts, these less than significant effects will be addressed briefly in the EIR and “scoped out.”

Figure 1: Regional Setting








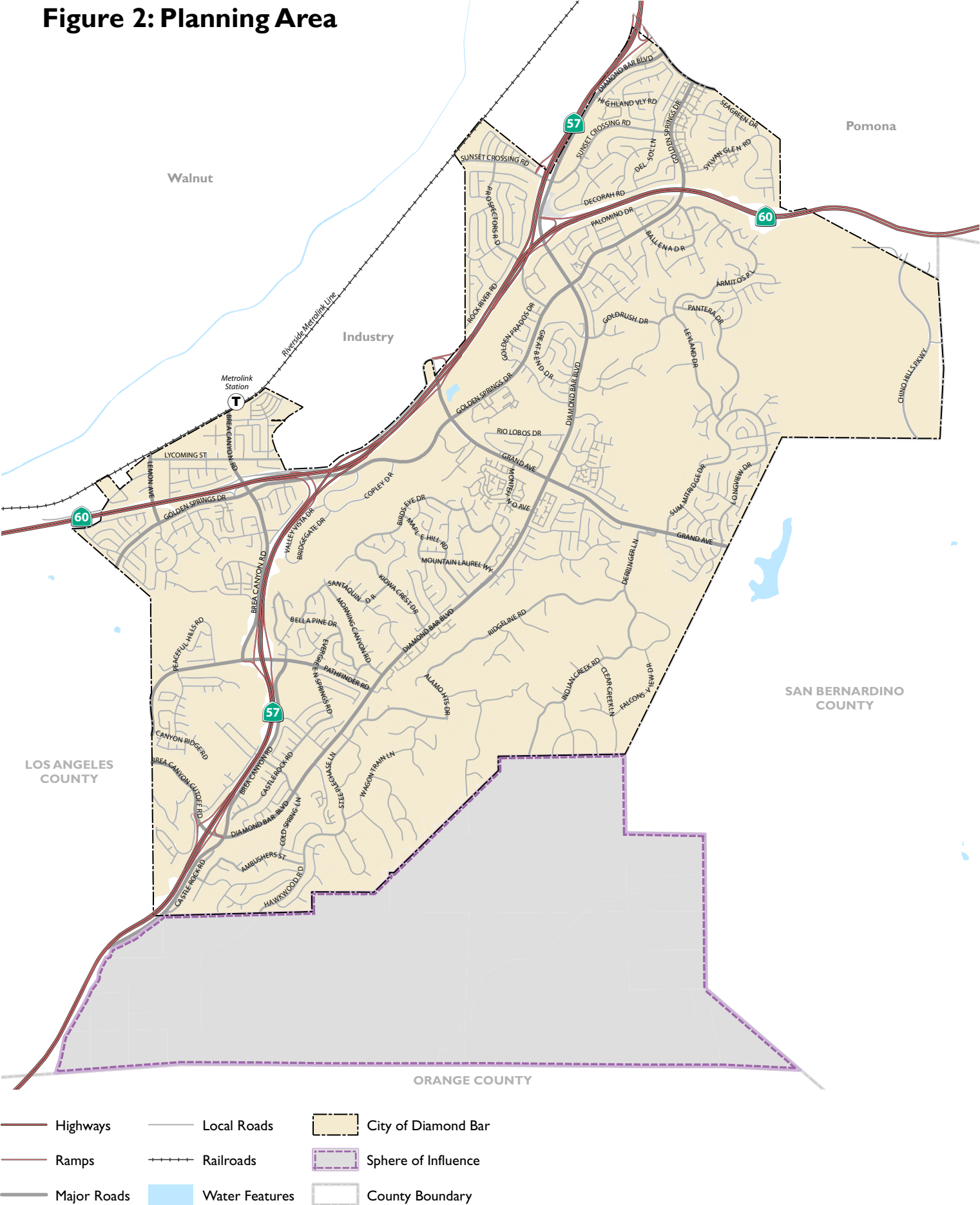
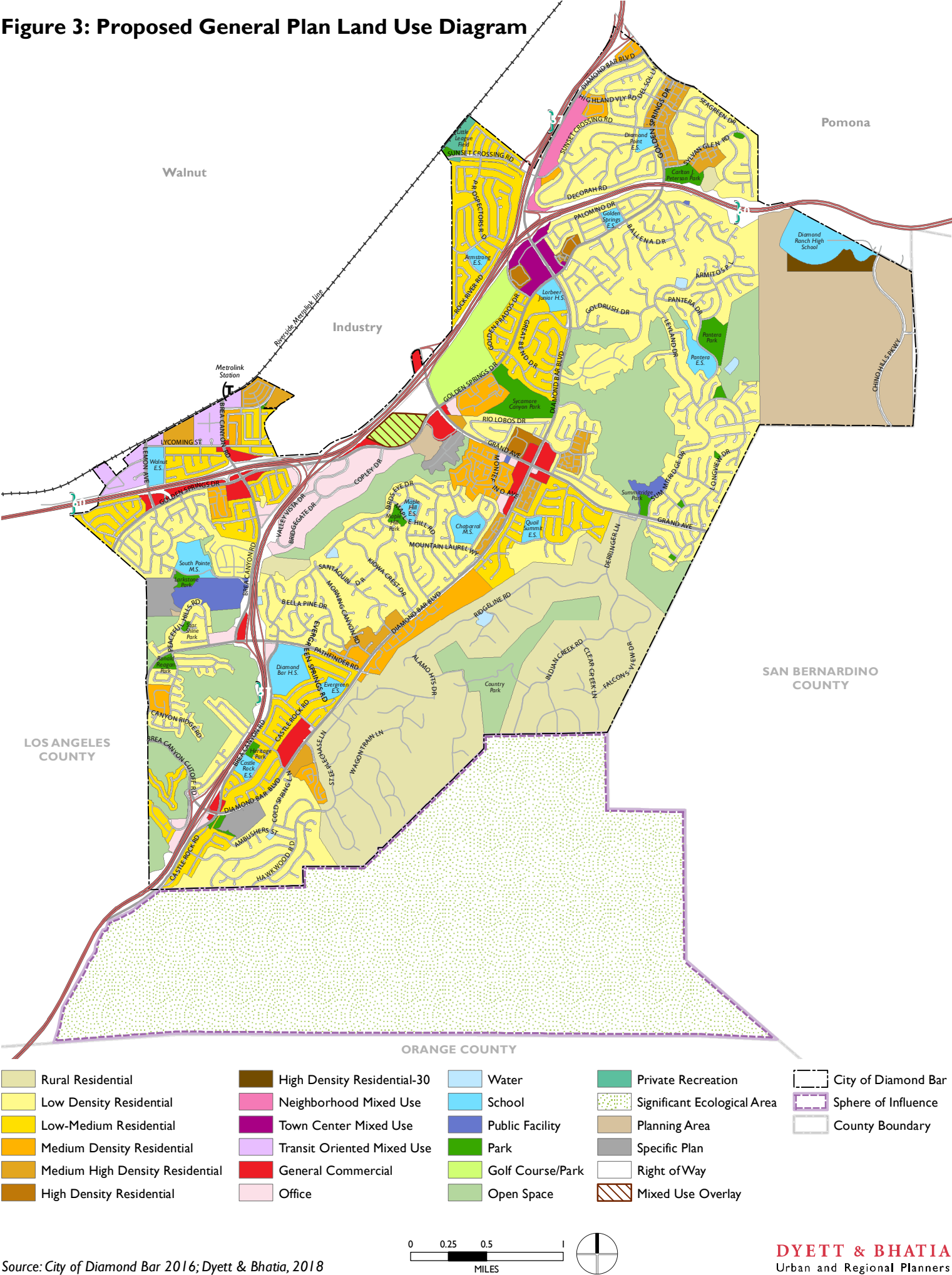
-  City of Diamond Bar Planning Area
-  Parks/Open Space
-  Freeways
-  Highways
-  Rail and Light Rail

Figure 2: Planning Area



Source: City of Diamond Bar 2016; Dyett & Bhatia, 2016

Figure 3: Proposed General Plan Land Use Diagram



Dr. Douglas Barcon
Diamond Bar, CA 91765

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive, Diamond Bar, CA 91765

June 8, 2018

Re: Comments on Notice of Preparation

Dear Ms. Lee,

Thank you for having the consultants correct the map colors in the area north of Highland Valley and south of Temple within Figure 3 on page 12 of the Notice of Preparation. I noticed that the area of the two mobile home parks along Lycoming St. in Figure 3 is properly colored as high-density residential to separate them from the transit-oriented mixed-use area. I believe this is the first map to delineate the mobile home parks as separate from the TOD area.

At the end of the April 19, 2018 GPAC meeting, there was mention of a possible residential use for the Walnut Unified School District bus parking lot and district offices along the east side of Lemon Ave. south of Lycoming St. and Walnut Elementary School to address an error in the transit-oriented mixed-use area. This information is reflected on page 36 in the April 18, 2018 GPAC meeting minutes. Where would the Walnut USD offices and bus parking lot relocate?

On pages 8 and 9 of the Notice of Preparation (NOP), it was noted that there are no agricultural activities or activities related to mineral resources within the Planning Area boundaries and that none of the properties are designated for agricultural use or mineral resources by the State of California. These activities are deemed to not be significant. I do not know whether the Planning Area discussed is the entire area covered by the General Plan Update as shown in Figure 2 of the NOP or only the tan area designated as Planning Area on the right side in Figure 3 of the NOP.

I am addressing the tan Planning Area on the east side of Diamond Bar, which includes Diamond Ranch High School and a proposed (RH-30) high-density residential development of 30 units/acre as shown in Figure 3. This area of approximately 720 acres of north Tres Hermanos Ranch has also been considered for possible relocation of the Diamond Bar Golf Course in the General Plan Update and for more residential property.

The 2014 update to the 1995 Diamond Bar Zoning Map shows the tan Planning Area as specified in Figure 3 in the Notice of Preparation to be zoned for agriculture, as indicated by the green color and embedded text "AG." Please refer to attached Figure 1, which shows a comparison between the tan Planning Area in Figure 3 of the NOP and the 2014 update to the 1995 Diamond Bar Zoning Map. Use of that property for anything other than agriculture would require a zoning change and would go against the vision of Diamond Bar when the zoning map was created for the 1995 General Plan. An area of 720 acres is of significant size, and this area

should go through the entire zoning process with public hearings before it is changed to a “Planning Area” in the General Plan Update, which may bypass the zoning process and be overlooked. Climate must also be addressed for any changes from open property to developed property, such as a solar farm or warehouses that can radiate or reflect heat and change airflow patterns.

Respectfully,

Douglas Barcon

Dr. Douglas Barcon

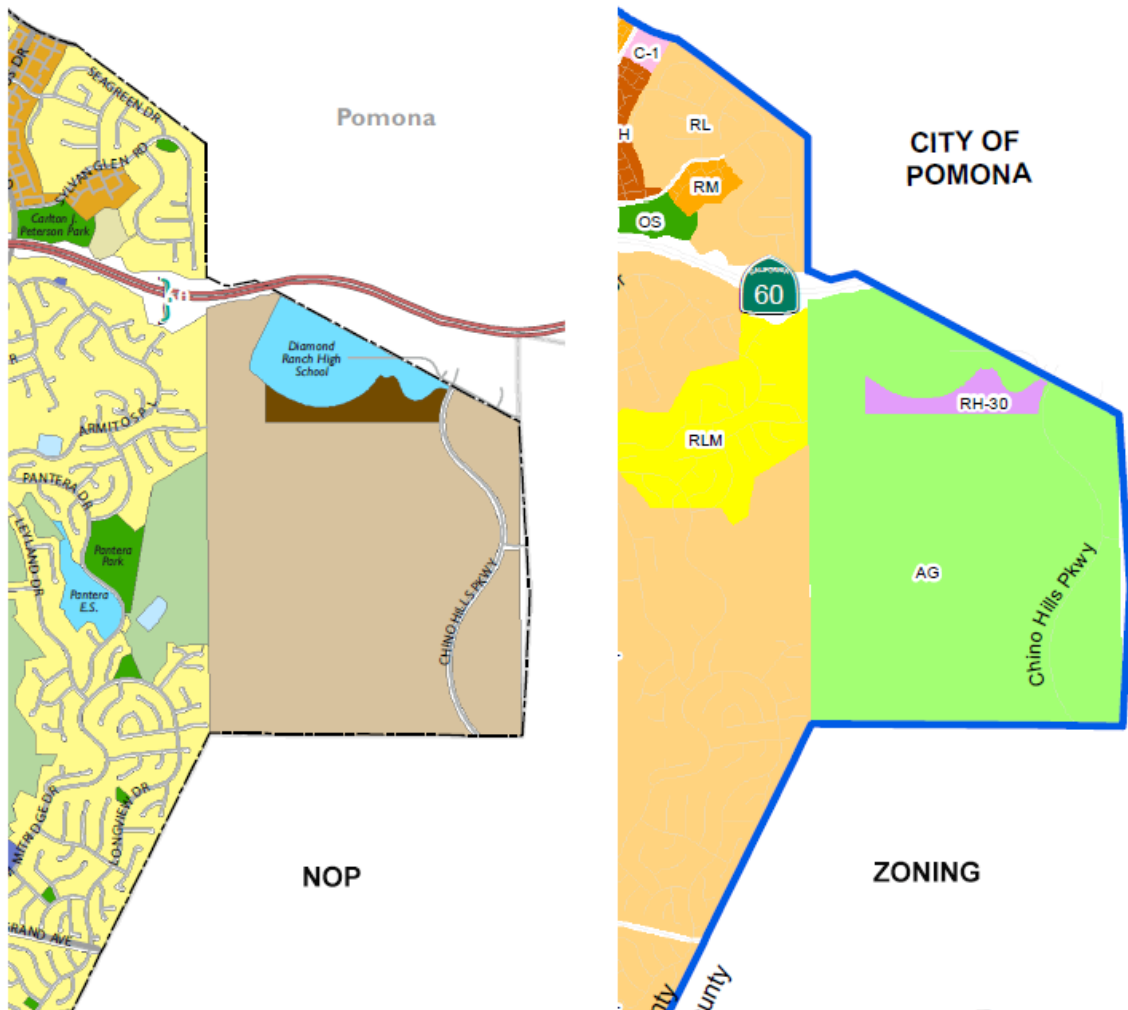


Figure 1

Dr. Douglas Barcon
Diamond Bar, CA 91765

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive, Diamond Bar, CA 91765

July 3, 2018

Re: Comments on GPAC and Environmental Impact Report

Dear Ms. Lee,

Diamond Bar is unique in the application of SB-743 incorporated in CEQA proposed section 15064.3 regarding transportation effects of a proposed project. I question whether CEQA guidelines can be applied equally to Diamond Bar as they are applied in areas where there is less impact from major transportation routes, such as highways, freeways, expressways, and tollways. I do not believe CEQA should apply equally to Diamond Bar. Diamond Bar should raise that standard to protect the environment and quality of life in the city. The General Plan Update and the Environmental Impact Report should go further in their assessments of traffic and continued new development in Diamond Bar. Traffic calming is not a solution; it is only a patch that will just shift traffic flow and cause gridlock somewhere else. Generally, Diamond Bar is comprised of single-floor developments. Adding or changing to mixed-use developments with multiple floors changes the aesthetics of Diamond Bar into something that it is not or was ever envisioned.

Diamond Bar is transected by two major freeways (California SR 60 and SR 57); Grand Avenue (linking Chino Hills to SR 57/60 and linking SR 57/60 to Interstate 10 in West Covina); Diamond Bar Blvd. (linking south Diamond Bar from SR 57 to north Diamond Bar, terminating at Temple Blvd. where it becomes Mission Blvd. in Pomona and continues eastbound through Ontario); and Golden Springs Drive (an extension of Colima Road parallel to SR 60, the SR 57/60 interchange, and then turning toward the north where it terminates at Temple Blvd. east of the intersection of Temple Blvd. and Diamond Bar Blvd.).

Major intersections in Diamond Bar are Grand Avenue/Diamond Bar Blvd.; Grand Avenue/Golden Springs Drive; Grand Avenue and the SR 57/60 interchange; Diamond Bar Blvd./SR 57 in south Diamond Bar; Pathfinder/SR 57; Golden Springs Drive/Brea Canyon Road; Golden Springs Drive/Diamond Bar Blvd.; Diamond Bar Blvd./SR 57/60 WB and EB; Diamond Bar Blvd./Sunset Crossing Road; Diamond Bar Blvd./Temple Blvd.; and Golden Springs Drive/Temple Blvd. Short stretches of road, such as Diamond Bar Blvd./Golden Springs Drive to SR 57/60 and Grand Avenue to SR 57/60 must also be considered because these roads are already saturated during peak commute hours or during freeway repairs. Any future projects that further increase traffic flow and volume at any of these intersections and routes should consider cut-through traffic from SR 57 and SR 60 and ensure that traffic flow is not negatively impacted as compared to traffic flow on these Diamond Bar streets and intersections in 2016-2018. I am considering 2016-2018 as base years for future traffic impact comparisons. See Diamond Bar Land Use Element 2013 #4(a) circulation on Page I-10.

There are life and safety concerns when traffic is gridlocked and emergency vehicles are unable to navigate through the area. In my opinion, a reasonable level of service for the roadways is Level B and C. Traffic on the major streets in Diamond Bar at peak hours is currently Level D for the level of service. Intersections are typically at Level D and Level F service. The proposed development of the southern end of the golf course will significantly and negatively impact traffic on Grand Avenue between SR 57/60 and Golden Springs Drive. The proposed mixed-use developments along Diamond Bar Blvd. from Temple Blvd./Diamond Bar Blvd. to SR 60 and from Gold Rush/Diamond Bar Blvd. to the WB SR 60 on ramp will also significantly and negatively impact traffic.

Such worsening congestion over 20 years compared to 2016-2018 levels will encourage current residents to leave Diamond Bar and encourage shoppers to avoid the congested areas. On days when SR 57, SR 60, and the SR 57/60 interchange are Level D and Level F, traffic on the affected local roadways and at interchanges in Diamond Bar will be a Level F or worse. Air quality will be worsened as long as there are gasoline and diesel-powered vehicles in stop-and-go traffic. What is the real estimate by AQMD on this impact to the local area and the residents? If more residents develop COPD, emphysema, and heart disease from this added pollution, the city has failed to protect residents in its zealous attempt to develop every piece of open space and go against the concept of country living.

Diamond Bar has not felt the full impact of the build-out along Grand Avenue in the City of Industry or the effects on the environment and traffic from any developments in Tres Hermanos Ranch. The loss of Grand Avenue as a viable route during times of heavy congestion from these developments will put pressure on other routes and possibly saturate them as well. CEQA in Diamond Bar should take into account the City of Industry.

Tonner Canyon (and 75 percent of Tres Hermanos Ranch) should remain as open space and a wildlife corridor. Development destroys trees, vegetation, and wildlife, but it also adds to the traffic and pollution. It could also lead to access ramps to the NB and SB SR 57 and add to the congestion on SR 57. Further, the concept of pedestrian-friendly communities is not practical when it is a mile or more to go shopping, and then, how are purchased goods transported back to a residence? See LU-I-9 in the Diamond Bar Land Use and Economic Development guide from the June GPAC meeting. The city should not trade loss of biological resources here in exchange for resources elsewhere. See RC-G-5.

Rather than accept any mandates by the State of California to develop as much property as possible into high-density mixed-use, the city should oppose such mandates because of the negative environmental impacts they will have on the city. Further, the city should oppose similar mandates from Los Angeles County and the Southern California Association of Governments. Very few of those officials live in Diamond Bar, and they do not care about the “country living” concept in Diamond Bar or the quality of life deteriorating in Diamond Bar. Diamond Bar should tone down its intent to infill as much open space as possible. Diamond Bar should limit the size and scope of any proposed mixed-use projects. It is time to say, “No,” and let Diamond Bar follow in the footsteps of other cities trying to maintain a good quality of life and preserve wildlife, trees, and other biological resources.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Barcon". The ink is dark and the signature is fluid, with a large 'D' and a long, sweeping 'B'.

Dr. Douglas Barcon



Department of Conservation

Division of Oil, Gas, and Geothermal Resources

Southern District

5816 Corporate Avenue • Suite 100

Cypress, CA 90630

(714) 816-6847 • FAX (714) 816-6853

June 28, 2018

VIA EMAIL

Ms. Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
2180 Copley Drive
Diamond Bar, CA 91765
Email: Glee@DiamondBarCA.Gov

Dear Ms. Lee:

**NOP – NOTICE OF PREPARATION
DIAMOND BAR GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN
SCH: 2018051066**

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project for impacts with Division jurisdictional authority. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration.

The project area is in Los Angeles County and is not within an administrative field boundary. Division records indicate that there are at least fifteen oil and gas wells located within the project boundary as identified in the application. Division information can be found at: www.conservation.ca.gov. Individual well records are also available on the Division's web site, or by emailing DOGDIST1@conservation.ca.gov.

The scope and content of information that is germane to Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative regulations under Title 14, Division 2, Chapters 2, 3 and 4 of the California Code of Regulations.

If any wells, including any plugged, abandoned or unrecorded wells, are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements and approval to perform remedial operations.

The possibility for future problems from geothermal wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division recommends that a diligent effort be made to avoid building over any plugged and abandoned well.

Ms. Grace Lee, Senior Planner
SCH No. 2018051066
June 28, 2018
Page 2

Questions regarding the Division's Construction Site Well Review Program can be addressed to the local Division's office in Cypress by emailing DOGDIST1@conservation.ca.gov or by calling (714) 816-6847.

Sincerely,



Grace P. Brandt
Associate Oil and Gas Engineer

cc: The State Clearinghouse in the Office of Planning and Research
Tim Shular, DOC OGER
Crina Chan, DOC OGER
Meri Meraz, DOGGR CEQA Unit
Chris McCullough, Facilities and Environmental Supervisor
Environmental CEQA File



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

July 3, 2018

Ref. Doc. No.: 4611684

RECEIVED JUL 05 2018

Ms. Grace Lee, Senior Planner
Planning Division
City of Diamond Bar
21810 Copley Drive
Diamond Bar, CA 91765

Dear Ms. Lee:

RECEIVED JUL 05 2018

NOP Response for the Diamond Bar General Plan Update and Climate Action Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on June 4, 2018. The City of Diamond Bar is located within the jurisdictional boundaries of District No. 21. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Diamond Bar (City) except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. The Districts should review development and redevelopment projects within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project. Please forward information on projects within the City to the undersigned.
3. The City's wastewater is treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 million gallons per day (mgd) and currently processes an average flow of 64.7 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.
4. In order to estimate the volume of wastewater a project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link for a copy of the Districts' average wastewater generation factors.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate proposed projects. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Dr. Douglas Barcon
23535 Palomino Dr., Suite 545
Diamond Bar, CA 91765

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive, Diamond Bar, CA 91765

June 21, 2018

Re: General Plan Update EIR

Dear Ms. Lee,

The current proposal for town-center mixed-use at Diamond Bar Blvd. and Golden Springs Dr., including the Diamond Ranch Center is already showing problems that would be made worse by adding the mixed-use component. While Coffee Bean & Tea leaf is a welcome addition to the Ranch Center, it has become a study hall that makes it difficult for others to patronize. McDonald's was remodeled, and against resident comments, the city required a plan that downsized the lobby and the number of seats to the point that customers have to leave, and reduced the number of parking spaces.

In regard to the Transit-Oriented Mixed-Use concept, it is unlikely that Union Pacific Railroad will allow more commuter trains on its shared tracks through the City of Industry because freight at the ports is increasing every year, and more freight trains will be necessary. The Transit-Oriented Mixed-Use concept may be impractical, and it only works for residents able to use the train for commuting to work during the hours they work and able to function with only one vehicle.

Since we are addressing environmental issues, the building of warehouses along Ferraro Parkway is reflecting railroad noise right into the homes in Diamond Bar throughout the area off Sunset Crossing and Prospectors. Where is noise abatement mitigation?

The General Plan include and ensure that Sunset Crossing Road remain closed to the west, north, and south from the City of Industry and Pomona. The baseball fields must remain.

The current Diamond Bar tree preservation ordinance is flawed because it allows a developer to remove virtually any trees and mitigate the loss by planting small trees in towns like Modesto or other areas away from Diamond Bar. This is not an acceptable ordinance, and the State law, which is somewhat similar should be amended. Diamond Bar should be proactive in the protection of Coastal Oaks and other trees, and not support their removal or replacement with twigs.

As for blight, what happens when businesses in mixed-use buildings fail and there are no businesses to replace them? Now, you have homes above empty business that can be used by the homeless or perhaps burned down.

Diamond Bar needs to covet and protect its open space and stop allowing building on every square foot, because all of this building will only lower quality of life, endanger wildlife, and add to traffic, pollution, and noise.

In my opinion, the city is built-out and should look only at redevelopment of blighted properties to improve them for the future of Diamond Bar. We do not want to become another El Monte. Diamond Bar must remain a family-friendly, desirable community, with a country living atmosphere. And finally, Planning Area 1 or Chino Hills Parkway south of the Pomona Freeway should not become another private area like The Country with large mansions on very large lots.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Barcon". The signature is written in dark ink and is positioned above the printed name.

Douglas Barcon



July 5, 2018

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive
Diamond Bar, CA 91765

14000 City Center Drive
Chino Hills, CA 91709
(909) 364-2600

www.chinohills.org

Re: Diamond Bar General Plan Update

Dear Ms. Lee;

Thank you for forwarding us the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Diamond Bar General Plan Update and Climate Action Plan.

The NOP provides a brief description of the proposed changes to the Diamond Bar General Plan Land Use Diagram. These changes would occur along Diamond Bar Boulevard from Golden Springs Drive to the SR 60, and between the 57/60 interchange and Highland Valley Road; south of the City of Industry Transit Station; and on a portion of the Diamond Bar Golf course south of Grand Avenue. These changes appear reasonable and would be located some distance to shared boundaries or shared roadways with the City of Chino Hills.

Figure 3, Proposed General Plan Land Use Diagram, of the NOP presents these proposed land use changes. The Diagram also appears to designate the portion of Tres Hermanos within Diamond Bar as "Planning Area". The NOP provides no further discussion of Tres Hermanos or the "Planning Area" designation given it by the Diagram.

Because Tres Hermanos is located within both of our communities (approximately 700 acres in Diamond Bar and approximately 1,750 acres in Chino Hills), the future of the Tres Hermanos property is of great interest to both our cities. Recognizing this mutual interest, our cities have worked closely together to monitor proposals by the City of Industry for Tres Hermanos.

Chino Hills 2015 General Plan Update incorporated a request by Diamond Bar to include a policy to work collaboratively with Diamond Bar in the planning process related to Tres Hermanos. Action Item LU-2.4.5 of the City of Chino Hills General Plan states: Coordinate with the City of Diamond Bar, where appropriate, regarding plans for the future development of Tres Hermanos. Chino Hills respectfully requests that Diamond Bar include a similar policy within its General Plan Update to promulgate our cities' shared interest in the future of Tres Hermanos.

July 5, 2018
Grace Lee, Senior Planner
Diamond Bar General Plan
Page 2

Again, thank you for the opportunity to review and comment on the NOP for the Diamond Bar General Plan Update. Chino Hills looks forward to reviewing the Diamond Bar General Plan Update, particularly policies related to Tres Hermanos, and the Draft EIR when it becomes available.

Sincerely,



Joann Lombardo
Community Development Director

cc. Konradt Bartlam, City Manager, City of Chino Hills

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0673
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Serious Drought.
Making Conservation
a California Way of Life.*

June 28, 2018

Ms. Grace Lee
City of Diamond Bar
2180 Copley Dr.
Diamond Bar, CA 91765

RE: Diamond Bar General Plan Update
and Climate Action Plan
Notice of Preparation of
Environmental Impact Report (NOP)
SCH # 2018051066
GTS # 07-LA-2018-01488-FL

Dear Ms. Lee:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The plan proposes an update to the General Plan and a Climate Action Plan for the City of Diamond Bar.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. Please reference to The Governor's Office of Planning and Research (OPR) for more information: <http://opr.ca.gov/ceqa/updates/guidelines/>

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this General Plan Update should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

If residential development is being considered near a freeway or conventional highway, sound walls or equivalent measures should be implemented in zoning and guidelines, and to protect future occupants from potential adverse effects associated with traffic noise levels exceeding these standards.

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work with the Lead Agency to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

Caltrans encourages the Lead Agency to actively promote alternatives to car use and consider vehicle demand-reducing strategies including incentives for commuters to use transit, park-and-ride lots, discounts on months bus and rail passes, shuttle buses, vanpools, etc. to the extent that more of the population shifts to transit for some of their inter-regional trips, future cumulative traffic impacts to freeways may be satisfactorily mitigated.

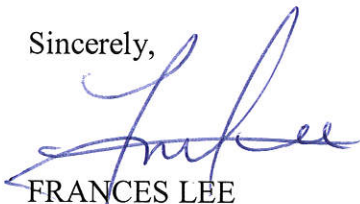
Regarding public transit, we recommend planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections.

Caltrans also seeks to provide equitable mobility options for people who are economically, socially, or physically disadvantaged. Therefore, we ask the Lead Agency to evaluate future development for access problems, VMT and service needs that may need to be addressed.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

If you have any questions, please feel free to contact the project coordinator, Ms. Shabnam Sheikh, at shabnam.sheikh@dot.ca.gov.

Sincerely,



FRANCES LEE
IGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse

CALIFORNIA WILDLIFE FOUNDATION

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fax 510.268.9948

July 3, 2018

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive
Diamond Bar, CA 91765

RE: Diamond Bar General Plan
Submitted via email: glee@diamondbarca.gov

Dear Ms. Lee:

The California Oaks program of California Wildlife Foundation works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, and providing wildlife habitat. We commend the City of Diamond Bar for the Tree Preservation and Protection Ordinance, and urge your department to show a commitment to strengthen those protections through the General Plan and the ordinance.

A number of citizens shared their concerns about draft General Plan. We have also been informed that the habitat mapping used in the General Plan materials do not accurately represent the city's oak resources.

This letter conveys a number of suggestions to better protect the city's unique oak resources:

General Plan

Land Use

I-30: This provision could be improved by suggesting that where feasible, that commercial development sites preserve native trees as part of the outdoor green spaces.

I-47 and 48: As currently worded, the preservation of hillsides is not assured. These provisions should be rewritten to protect the city's natural infrastructure.

Resource Conservation/Open Space

RC I-3: Land designated as open space by deed (dedication, condition, covenant, or restriction), open space easement, or map restriction should not have its protections revised, terminated, abandoned, or removed.

Specific Plan

Prudent city planning favors infill development and natural resource protections rather than annexation.

Tree Ordinance

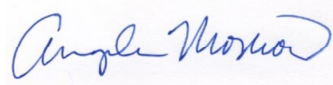
Lastly, we urge the City of Diamond Bar to strengthen the tree ordinance by applying it to parcels of one-half acre and smaller, and to extend individual tree protections to trees smaller at than eight inches diameter at breast-height (DBH).

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Janet Cobb". The signature is written in a cursive, flowing style.

Janet Cobb
Executive Officer

A handwritten signature in blue ink that reads "Angela Moskowitz". The signature is written in a cursive, flowing style.

Angela Moskowitz
Manager, California Oaks Coalition

cc: Cynthia Robbins, Sierra Club

H I L L S F O R E V E R Y O N E

*Southern California comes
together at the Puente - Chino Hills*



Los Angeles County
Orange County
Riverside County
San Bernardino County

July 6, 2018

Submitted via email to: GLee@DiamondBarCA.Gov

Grace Lee, Senior Planner
City of Diamond Bar
21810 Copley Drive
Diamond Bar California 91765

RE: Comments on the Diamond Bar General Plan NOP

Dear Ms. Lee:

I'm writing on behalf of Hills For Everyone (HFE), to provide comments on the City of Diamond Bar's (City) General Plan Update (GPU) and its Notice of Preparation (NOP) of an Environmental Impact Report (EIR). HFE is a non-profit organization that strives to protect, preserve, and restore the environmental resources and natural environs of the Puente-Chino Hills and surrounding areas for the enjoyment of current and succeeding generations. We are closely following the City's GPU as there are natural lands within the city proper and its sphere of influence.

Please know that HFE has also participated in numerous updates on planning documents for surrounding cities and we include other suggestions for sustainability and thoughtful planning in these comments as well. As the City is aware, planning for land uses within the built environment is inherently connected with the resource preservation and park component of any community. Therefore, our comments will also include planning ideas to improve the policies developed and reviewed during the General Plan (GP) Advisory Committee (GPAC) meetings.

Comments on the Notice of Preparation

HFE supports the creation of an Environmental Impact Report (EIR) for the GPU and looks forward to reviewing its content in the Winter of 2019. We also support the creation of a Climate Action Plan to help reduce greenhouse gas emissions (GHG), reduce vehicle miles travelled, and ensure the City does its fair share to help the Southern California Association of Governments (SCAG) meet regional GHG reduction targets and the California Air Resources Board (CARB) meet the statewide targets for SB 375.

Land Use and Economic Development (Land Use and Planning and Population and Housing)

The EIR will address land use and economic development; we ask the following items be addressed as well. With regard to the following issues, how will the new GP:

Land Use and Planning

- Incorporate sustainable planning measures?
- Ensure new residential buildings are pre-wired and pre-plumbed for solar?
- Ensure community design features are incorporated in new projects?

Population and Housing

- Meet Regional Housing Needs Assessment (RHNA) goals?
- Ensure minimal impacts to local schools and community centers?
- Ensure a balance between jobs and housing?

Community Character and Placemaking (Aesthetics)

Since the EIR will address community character and placemaking, we ask the following items be addressed as well. How will the new GP:

- Align with the community's design?
- Address design guidelines?
- Handle tree removal and aesthetic impacts?
- Maintain scenic vistas and resources?
- Reduce night lighting in wild areas?
- Retain visual character and charm of the existing community?

Circulation (Transportation and Traffic)

The EIR will address circulation so we ask the following items be addressed as well. How will the new GP:

- Address level of service, load, and capacity for existing roads?
- Reduce wait times at traffic signals?
- Incorporate more pedestrian, and bike-friendly amenities?
- Reduce the use of vehicular transportation?

Resource Conservation (Air Quality, Biological Resources, Cultural Resources, and Hydrology and Water Quality)

The EIR will address resource conservation and we ask the items listed below be addressed as well. How will the new GP:

Air Quality

- Inventory greenhouse gas emissions for baseline conditions?
- Inventory greenhouse gas emissions for future conditions?
- Address if and how the Air Quality Management Plan has been met?
- Inventory the emission of NO_x, PM₁₀, PM₂₅?
- Get to or be near a CO₂ neutral plan?
- Address dust and diesel impacts?

- Evaluate acute and chronic impacts to the community?

Biological Resources

- Address existing wildlife movement corridors?
- Address planned wildlife movement corridors?
- Incorporate planning features to add wildlife movement corridors (culverts, fencing, etc.)?
- Protect endangered, threatened or species of special concern?
- Protect federally or state designated critical habitat?
- Protect sensitive habitat?
- Ensure bird migration routes are available for the Pacific Flyway?
- Ensure new developments reduce impacts to wildland areas (i.e., social [unauthorized] trails, spread of non-native and/or ornamental landscaping)?
- Reduce habitat fragmentation in existing wildland areas?
- Limit edge effects in existing wildland areas?

Cultural Resources

- Protect Native American artifacts?
- Preserve historic structures?
- Accommodate sites considered valuable to Native American Councils?

Hydrology and Water Quality

- Address water restrictions with possible state imposed cutbacks?
- Address possible drought conditions in the future?
- Incorporate reclaimed water systems?
- Focus on low impact development?
- Conduct a water supply assessment?
- Ensure new developments are or are as close to water neutral as possible?

We would encourage the City to complete a Health Risk Assessment based on its proximity to major freeways.

Public Safety (Geotechnical Hazards and Hazards and Hazardous Waste)

The EIR will address public safety so we ask the following items be addressed as well. How will the new GP:

Geotechnical Hazards

- Address earthquake faults within or near the City?
- Address known and/or historic landslides?
- Address known or potential locations for liquefaction?
- Allow landforms to be altered?

Hazards and Hazardous Waste

- Address site contaminants within or near the City?
- Reduce the wildland-urban interface?

- Ensure new developments in High or Very High Fire Hazard Severity Zone include multiple daily ingress/egress points in as many directions as possible?

Noise

- Create community noise level standards in the general plan?
- Reduce noise impacts to existing businesses/residents from construction?
- Avoid sensitive receptors?

Public Services and Facilities (Public Services and Utilities)

The EIR will address public services and facilities. We ask the following items be addressed as well. How will the new GP:

Public Services

- Limit the creation of urban-wildland interface areas?
- Impact response times for emergency services?
- Impact evacuation times for existing and/or future residents?
- Incorporate in-lieu fees?
- Address or create community facility districts?

Utilities

- Reduce impacts from electrical lines?
- Consider undergrounding electrical lines?
- Enhance or upgrade sewer or water/wastewater lines to accommodate new growth?

Request for CEQA Notices

In addition to providing these comments, we respectfully request that the City of Diamond Bar provide HFE with copies of CEQA notices issued for the above-referenced project. This request is filed pursuant to Public Resources Code §21092.2. The requested notices should be mailed to the following address:

Claire Schlotterbeck
Hills For Everyone
P.O. Box 9835
Brea, CA 92822-1835

GPAC Policy Comments

We've reviewed the GPAC agenda from June 21, 2018 and provide the following substantive comments:

General Comments

The City of Fullerton has within its General Plan from 2012 limited its policies to describing only focus areas (also called opportunity areas). (See **Attachment 1**) Limiting the General Plan Update to focus areas will ensure the existing stable neighborhoods and commercial centers aren't unfairly impacted by new, denser and taller developments right next door. This approach allows the City to focus its development or revitalization in areas where it is truly needed. This approach (opportunity areas) is something we would support.

Additionally, the City of Santa Ana has created very specific design guidelines for construction within its city limits. In terms of maintaining the character and quality of life, Diamond Bar residents have come to expect, establishing solid design guidelines will take the design negotiations out of the equation when new projects come to the City. We've included Santa Ana's guidelines for your reference. (See **Attachment 2**)

There seemed to be significant discussion about density. But something lacking is a policy about height maximums. Other cities have set height maximums in policy documents. This provides assurances for existing residents and businesses, and confirms for future applicants what the height expectations are within the City.

Additionally, and generically across all mixed use policies, but sometimes specified in parenthesis, these should include an integrated design, human scale, complete streets, vertical and horizontal integration, sensitive transitions between differing land uses, building orientation, energy efficiency, community gathering areas (parks, water features, seating, shade structures, dog waste stations, bike parking, etc.) (LU-I-30), and limiting visual intrusions (LU-G-3).

You may consider a permit streamlining policy for mixed uses projects that meet certain criteria.

To further your policies and General Plan ideas, a regional non-profit partner of ours, Friends of Harbors Beaches and Parks (FHBP), has also crafted numerous policy recommendations for cities to use. Three policy toolkits have been created and we are sharing those with you electronically. The first is the General Plan Resource Directory (See **Attachment 3**), which includes policies the City can consider incorporating into its General Plan Update. These are cutting edge policies adopted in other cities. The second is the Healthy Communities Toolkit (See **Attachment 4**) which outlines policies that create and fund sustainable, livable, and vibrant communities while simultaneously protecting important resources. The last, is the Urban Park Solutions Toolkit (See **Attachment 5**), which offers more than a dozen useful recommendations to overcome park and park program challenges.

Policy Comments

To be most helpful in policy recommendations, we've offered general comments and revisions to specific policy language. As it relates to the policies, additions are shown in *italics*, deletions are shown with a ~~strike through~~.

PDF Page 53 – *Mixed Use Guiding Policies: Neighborhood Mixed Use*

Within Item 3 we recommend the following edits:

“Ensure that new development is sensitive to the scale, *density, and massing* of adjacent residential uses while allowing for higher intensity development along Diamond Bar Boulevard to foster the corridor's revitalization.”

To ensure stable neighborhoods are not overly impacted by towering developments, not only does scale need to be considered, but also density (the number of units per acre) and massing (the three dimensional form of the building). To ease the transition between neighborhoods and existing retail centers, the city should incorporate concepts like multiple level setbacks from

existing lower height buildings. In other words, buildings that stair step in height, like 3-4-5 stories.

PDF Page 50 – Guiding and Implementing Policies: Land Use

To ensure sensitive species and their movement corridors are protected within the General Plan, we suggested the following modification to LU-I-2:

“Allow clustering or transferring all or part of the development potential of a site to a portion of the site to preserve significant environmental resources such as vegetated habitats, *sensitive species*, *wildlife movement corridors*, water features, and geological features within proposed developments as open space if the developer dedicates the open space to the City or a conservancy.”

Later in the Implementing Policies, it states (LU-I-4): “Monitor and evaluate potential impacts of major proposed adjacent, local, and regional developments...” It may be helpful to define what major is by either a number of units, project size (acreage), or amount of grading. This will take the guess work out of the situation. Therefore, proposed language could include:

“Monitor and evaluate potential impacts of major proposed adjacent, local, and regional developments *that are 30 units or more* in order to anticipate land use, circulation, and economic impacts on Diamond Bar.”

Guiding Policy LU-G-7 should define what a “complete neighborhood” actually is prior to encouraging a well-designed complete neighborhood.

Within LU-I-8, the policy should also include density and massing, so new language could be:

“Require that new residential development be compatible with the prevailing character of the surrounding neighborhood in terms of building scale, *density*, *massing*, and design...”

Density and massing should also be included in LU-I-6, LU-I-13, LU-I-21, LU-I-37 as well.

Community amenities like parks, water features, seating, shade structures, dog waste stations, bike parking, etc. should be included in LU-I-5.

LU-G-13 should define what a “key corridor” is.

Has the city’s parking or shared parking ratios been updated recently? If not, this may be a prime time to update them based on new parking modeling and parking requirements within the General Plan.

To reduce visual impacts (LU-I-16), the City should consider a mixed use building with a “wrap feature” so that parking is hidden from view and the exterior of the building is residential or commercial space.

Within LU-I-18, the City should consider setting a maximum density for Transit Oriented Mixed Use projects.

PDF Page 58: Public Facilities, Open Space and Hillsides: Implementing Policies

Instead of listing off all potential partners, it may be helpful to state in policy LU-I-44:

“Collaborate with public service providers and agencies, including but not limited to:...”

The City should consider a policy that promotes the ecological integrity of the natural environment by incorporating a policy such as:

“Shall ensure natural lands are designed such that ecological integrity, wildlife movement, and preservation of biodiversity are prioritized.”

And,

“Shall ensure sensitive, threatened and endangered species and species of special concerns are protected to the maximum extent possible.”

And,

“Shall ensure existing and planned wildlife movement corridors are protected in situ.”

Due to the rich habitat and native oak and walnut trees within the city itself and its sphere of influence, we suggest a tree preservation policy. The County of Orange is presently considering adopting one and we have included language for that policy drafted by FHBP. (See **Attachment 6**)

PDF Page 71: Resource Conservation: Implementing Policies

Within policy RC-I-7 it states:

“Discourage development on slopes of 50% or greater.”

We live in an area subject to earthquakes, liquefaction, and slope failure. Diamond Bar has historically seen the impacts of these slope failures on homeowners in the city. Our recommendation is to remove this sentence from this policy and create a new one that is stronger. For example, the City of Brea adopted a Hillside Management Ordinance that reduces the allowable density based on the average slope of the property. The greater the slope, the fewer dwelling units per acre. (See **Attachment 7**)

Additionally, the City of Chino Hills has prominent ridgelines protected under the General Plan’s Scenic Resources and codified in the Municipal Code. This type of policy protects exceptionally prominent ridgelines from development and massive grading. The City of Chino Hills’ language is:

Policy LU-1.2: Preserve and enhance the aesthetics resources of Chino Hills, including the City's unique natural resources, roadside views, and scenic resources.

Action LU-1.2.1: Continue to protect City designated extremely prominent ridgelines, prominent ridgelines, and knolls from intrusion by development.

The Extremely Prominent and Prominent Ridgeline Map is included for your reference. (See **Attachment 8**)

Within Policy RC-I-1d, item "d" is too limiting. There are many ways to protect land through partnerships and many conservation mechanisms (not just easements). We propose the following language:

"Collaborating with agencies, land trusts and other conservation groups to acquire open space land through ~~conservation easements~~ mechanisms such as conservation easements, deed restrictions, mitigation banks, etc."

Why put an emphasis on preserving open space in policy RC-I-1d and then allow its removal in item RC-I-3? We strongly suggest eliminating this entire policy (RC-I-3). Decisions to allow residential, commercial, or roadways are always permanent. But, it appears parks and open space are considered a temporary land use in the City of Diamond Bar. To put it another way, residential is never torn down to create open space, so the creation of open space should be a permanent land use in the City as well. If decisions to create or dedicate open space can simply be undone by a future decision making body, what's the point of setting it aside in the first place? Open space should retain its protected status and that should be guaranteed in the General Plan.

PDF Page 67 - Figure 1: Preferred Plan and Other Land Use Classifications (page 1 – 3)

Significant Ecological Area needs to be defined within the document since it is included in the Preferred Plan legend. All the other land uses are included, except this one. We suggest language directly from Los Angeles County:

"Significant Ecological Areas (SEA) are officially designated areas within LA County with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity within LA County by designating biological resource areas that are capable of sustaining themselves into the future. The SEA Ordinance establishes the permitting, design standards, and review process for development within SEAs, balancing preservation of the County's natural biodiversity with private property rights."
(Source: <http://planning.lacounty.gov/site/sea/>)

Community Core Overlay is defined in the Land Use Classification but not included in the Preferred Plan Map. Where is this overlay proposed to go?

PDF Page 66 - Density/Intensity Standards Summary Table

Significant Ecological Areas are left off this summary table. The allowable density and intensity should correspond to what the County of Los Angeles allows.

The Mixed Use Overlay is also excluded from the map and should be included.

PDF Page 78 - Figure 3: Open Space Resources

This map identifies the land below the City proper as being owned by the Firestone Scout Reservation. This is incorrect. It is owned by the City of Industry and has been since 2001. It is unclear what color this ownership aligns with in the legend. Regardless, Industry's land is not parkland. At best, using your categories, it is vacant natural land.

Additionally, the land immediately west of Industry's ownership is land owned by a subsidiary of Shell-ExxonMobil, called Aera Energy. This land is also vacant natural land. (See

Attachment 9)

That said, both properties have development proposals on them: Industry for a water reservoir in Middle Tonner Canyon and a solar farm in Upper Tonner Canyon. Aera's proposal is for housing east and west of the 57 freeway.

PDF Page 80 - Figure 5: Special Status Plant Species

The CNDDDB was referenced as a source for your biological data in this map. It also states the CNDDDB date as November 2016. This map should be updated to include most recent CNDDDB data to ensure accuracy of the contents. This data is already two years old.

PDF Page 81 - Figure 6: Special Status Animal Species

As per the comment above, this map should also be updated to the most recent CNDDDB data to ensure accuracy of the contents.

Thank you for the opportunity to provide substantive feedback on the NOP for the GPU EIR preparation and comments on the GPAC policies. Should you have any questions, I can be reached at 714-996-0502.

Sincerely,



Claire Schlotterbeck
Executive Director

Enclosures:

- Attachment 1 City of Fullerton Focus Areas
- Attachment 2 City of Santa Ana Design Guidelines
- Attachment 3 The General Plan Resource Directory: Creating Sustainable Communities in Orange County
- Attachment 4 The Healthy Communities Toolkit: Tools to Implement and Finance Healthy Communities
- Attachment 5 Promoting Innovative Solutions to Increase Parks & Park Programs in Urban Neighborhoods

Attachment 6 Draft County of Orange Tree Preservation Policy
Attachment 7 City of Brea Hillside Management Ordinance
Attachment 8 City of Chino Hills Ridgeline Policies
Attachment 9 Natural Lands Within the Puente-Chino Hills Wildlife Corridor

Date: June 21, 2018

To: Grace Lee, Senior Planner

From: Grace Lim-Hays

Subject: Scoping Comments for Draft EIR for Diamond Bar General Plan Update

The proposed General Plan should be thoroughly analyzed for environmental impacts on all environmental factors which affect overall quality of life.

“Transit Oriented Mixed Use (TOD-MU). TOD-MU would allow high-density housing and supporting commercial uses.”

1. Adjacent to City of Industry and its unmitigable development projects exempted from an EIR, this area of Diamond Bar has characteristics of a disadvantaged community in its greater exposure to compound health risks and pollution exposure. The nearby freeway onramps/offramps and the Industrial centers, ongoing earth-moving and future construction at the Industry project sites, and trains permeate the sensitive neighborhoods of lower income housing and schools with noise, traffic and pollution.
2. The additional car trips that will be generated by high-density housing and commercial in TOD raise concerns about increasing exposure to pollution, noise, traffic congestion and hazards to safety. Environmental Justice policies require reduction of pollution exposure and the improvement of air quality and health risks for disadvantaged communities. (OPR)
3. Evidence needs to be collected and close studies conducted on existing levels and the future impacts of TOD development on the area’s air quality, noise levels, safety and the circulation on major and minor roadways such as Brea Canyon Rd/ Golden Springs (currently operating at LOS E/ 0.94 at PM peak hours, and LOS C/0.78 at AM peak hours), Brea Cyn. Road/Washington, Lemon Ave/Golden Springs, Brea Cyn Rd./Lycoming? How will the addition of high density housing increase vehicle trips in these usually congested roads? Additional commercial/housing will affect available street parking in the area which is already a challenge for residents. How will this be addressed? How will school safety be affected for children walking to school and being dropped off with additional traffic? The study should also account for the impacts of the newly opened freeway onramps/offramps by Lemon Ave. that was not studied in the Existing Conditions Reports.
4. Possible mitigation would be to reduce the density of the development from 30 units/acre to 20 units/acre max. There should be a specific acreage set for the parks which is lacking in the area compared to other more affluent areas of Diamond Bar. There should be traffic calming features to prevent accidents near the school.

“Community Core Overlay would be applied to the portion of the Diamond Bar Golf Course south of Grand Avenue. . .would allow and encourage a mix of uses with an emphasis on destination and specialty retail, dining, and entertainment uses.”

Tres Hermanos Ranch portion in Diamond Bar’s sphere of influence is identified as High Density Housing project.

The State General Plan Guidelines state: “Evaluation of a jurisdiction’s natural resource systems based on sound science and ecological principles is an important first step in preparing the conservation element....Jurisdictions

should assess the current condition of their natural resource systems, the ecological processes and compatibilities upon which they depend and their sustainability based on anticipated uses. Analysis of the sustainability of resource uses should take into account changing burdens on local ecosystems as a result of a changing climate or other environmental conditions, and should measure the values that these resources contribute to the community and state. In their evaluation of natural resources, local governments should identify priority areas to conserve that offer the most effective and efficient protection of the natural resource systems, and focus policies” (OPR, Ch. 4, p. 111-112)

However, the Existing Conditions Report (III) has inaccurately reported on the sensitive species and natural resources. For example, there have been concerns voiced by the Sierra Club Task Force of inaccurately unreported Wetland and Riparian habitats distributed throughout the city. Southern Coast Live Oak Riparian Forest in Tres Hermanos and Diamond Bar Creek within Steep Canyon is a significant riparian area with mature sycamores and willows, but they are not in the report. There are also burrowing owl reported in the Tres Hermanos property that is part of a wetland, but not included in the report.

1. **The Diamond Bar Golf Course** is valuable open-space with diverse biological resources, sensitive habitats and cultural/historical significance that residents have sought to be conserved. Open space is defined as an area of land that provides value related to “recreation, health, habitat, biodiversity, wildlife conservation, aesthetics, economy, climate change mitigation and adaptation, flood risk reduction...and protection from hazardous conditions.” (OPR, Ch.4, p. 121)

Accurate inventory and scientific study should be conducted of the Golf Course’s ecological resources and its contributions to climate change mitigation and adaptation, water filtration and greenhouse gas mitigation, and noise abatement.

There needs to be studies of the impact of developing the Golf Course on circulation on an already very congested Grand Ave./Golden Springs (vey poor LOS already at .96). How will the increased traffic from additional vehicle trips to proposed mixed-use development affect air quality? Noise? Green House Gas emissions?

How will the EIR accurately account for and mitigate the above environmental impacts with the adjacent City of Industry’s projects being exempt from an EIR?

To better protect the open spaces offered by the Golf Course, and overlay should be placed on the Northern half to also protect it.

2. **Tres Hermanos Ranch** is part of the last remaining large, unprotected tracts of open space left within the Puente-Chino Hills Wildlife Corridor. It is a sensitive and diverse habitat for many threatened and endangered species. The proposed Land Use Map has plans to develop High Density housing in part of this area within adjacent to Diamond Bar.

The EIR should study the impacts of losing this portion of open space’s contribution to temperature regulation, cleaner air, water filtration, and health. It should study the impact on circulation, air quality, noise, greenhouse gases from developing high density housing in this open space.

There needs to be an accurate inventory and study of the biological resources and sensitive habitats throughout Diamond Bar and how these will be affected by all proposed land-use changes and potential developments. The Existing Conditions Report, missing significant data on sensitive habitats and watersheds, is an inaccurate baseline which would make the EIR analysis of environmental effects inadequate.

Moreover, the Existing Conditions Report III claims that “planned facilities are capable of maintaining a sufficient level of service for projected growth in the city.” (70) However, there is a lack of data on what would be sufficient or how this is measured. The lack of rain, longer heatwaves, and decreasing snow pack is making water shortage a real scenario in the future, so there needs to be quantifiable and data-driven analysis of the water supply and the impact of additional developments on it.

Thank you,

Grace Lim-Hays

limhays@aim.com

21323 Cottonwood Ln.

Walnut, CA 91789



Save the Tres Hermanos Ranch

TO: Ms. Grace Lee, Sr. Planner - City of Diamond Bar, Planning Dept.

Subj: Notice of Preparation, City of Diamond Bar

General Plan update.

The City of Diamond Bar's must establish a wildlife corridor connecting Chino Hills State Park, City of Diamond Bar, Puente-Chino Hills Wildlife Corridor and Whittier Narrows. This corridor is located on the Tres Hermanos property bordering Chino Hills, Brea, and Pomona.

Documented observations of rare, endangered and native plant and animal species are located within the city of Diamond Bar. Diamond Bar also has critical wetlands traversing the city. Tres Hermanos property is the largest and most identifiable.

Residential development projects bordering this open space should be declared CEQA exempt and land use projects which potentially impact should take into account resident safety, watersheds, soil stability and sensitive species that could be impacted. Diamond Bar's landslide status and seismic risk also poses a threat which increases when sensitive areas like Tres Hermanos are developed. Natural open space like Tres Hermanos should be considered for preservation or enhanced to support human safety, watersheds, green infrastructure and create habitat connectivity to larger land parcels. We request the environmental impact report thoroughly discuss this complex topic. These resources need to be thoroughly identified, documented, and the potential impacts be stated in the Environmental section of the General plan. Thank you for the opportunity to provide input.

Jim Gallagher

Save The Tres Hermanos Group

Chino Hills, CA

909-518-9318

January 24, 2018

TO: City of Diamond Bar Community Development Director, Greg Gubman

CC: City Manager, Dan Fox, City Council

RE: Inadequate Environmental Reporting Questions

Enclosed with this letter, please find a copy of the Redline Existing Conditions Habitat map provided by Dyett & Bhatia in the Diamond Bar Existing Conditions Report, Vol III, page 13. Please notice that no coast live oak woodland (pink color) is indicated in the city of Diamond Bar, excepting a few small areas in the north of the city near Armitos Place, and some in Diamond Bar's portion of Tres Hermanos. A few oak woodlands are shown in Diamond Bar's sphere of influence, but hardly any. Instead, the habitat map indicates concentrations of "walnut woodland" (yellow color) throughout large sections of the city.

Now, however, a dispute has erupted. Residents, in the Country near the Millennium development, claim Millennium contractors illegally graded their private property. Residents retained an independent ecological report, which found the habitat strongly dominated by sensitive Southern Coast Live Oak Woodland riparian – a habitat of special consideration, per California Dept. Fish Wildlife. The habitat was destroyed.

In addition, a May, 2011 Los Angeles County map, (Figure A5-Los Angeles County – Puente Hills Oak Woodland Areas, enclosed) Shows nearly the entire city of Diamond Bar to have Oak Woodland habitat.

In addition, another Los Angeles County map, (Figure 4 – Potential Oak Woodlands Conservation Areas in Los Angeles County, enclosed) shows nearly the entire city of Diamond Bar to be covered in Oak

Woodlands and that nearly the entire city of Diamond Bar should be an Oak Woodland Conservation Area

This leads an inquisitive individual to wonder, why weren't Southern Coast Live Oak riparian habitats depicted on Diamond Bar's above referenced map of existing conditions? Why are the many oak wetlands and creeks distributed in the city, not on the map?

With the current version of the above mentioned map, the City of Diamond Bar is essentially telling its citizens, that Diamond Bar has no significant ecologically sensitive areas—when, in fact, reputable ecological experts have determined the exact opposite is true.

Los Angeles County, oak woodland maps along with state mapping data indicate dominant coast live oak woodland. This is further verified by using the CDFW ecosystem ID data. Walnut, willow habitat is present in the city, but is NOT dominant. (Attached)

It is also readily recognized by regional experts that Diamond Bar overlays one of the 36 biodiversity hot spots in the entire world. We have many rare ecosystems: coastal sage scrub, chaparral and southern coast live oak woodland. Ecosystems, many of which are protected by specific California law.

Given state laws (SB 1334) regarding the protection of Coastal Live Oaks, this serious omission leads one to draw one of two conclusions. It gives the impression of that the city is, for all intents and purposes, criminally negligent in preparing a map which grossly under reports the sensitive nature of the city's habitat and environment, or, the oversight is the result of gross incompetence.

Either way, these omissions seriously impact the integrity of the General Plan process, calling into question the integrity of all the information being presented by the city through Dyett & Bhatia. Indeed, we are very concerned about other serious omissions in the above, mentioned

report.

Again, no mention is made of the many wetlands in the city. No report of the California Gnatcatcher, Least Bell's Verio or golden eagle – species our studies are finding in abundant distribution throughout the trails and urban wildland interface. Those omissions, however, will be the subject of another letter.

The impression that the Coast Live Oak Woodland omission from the map was deliberate is further reinforced by the fact that Steve Nelson/ESA-PCR sub-contractor, created these maps. I understand he is an “old friend” of the city, having served as a planning commissioner for thirteen years.

To an impartial outsider, this “cozy” relationship gives the appearance to concerned citizens of deliberate under reporting of sensitive habitat in the city so as to more easily allow development of ecologically sensitive areas.

How much was the consultant paid to produce the above mentioned map? Precisely, how many man-hours were used to perform the work? What are the names and credentials of the actual field survey crew? If there was no fieldwork done, why not? If fieldwork was done, how much? Where? When? Please be specific.

Were the indicators on the maps obtained by “ground-truthed” protocol monitoring, per CDFW 2015 standards? If not, why not? If so, please specifically describe how these standards were implemented. Please explain how ESA-PCR is interpreting the California Natural Diversity Database maps. There is a posted, specific guide to interpreting their data. Is the text copy in the Biological Resources chapter 2.2 interpreting the wildlife habitats on the maps using the CNDDDB guideline? If not, why not? If so, please explain how said guideline was interpreted.

Now that verifiable proof exists that this important map is inaccurate, (proof which will stand up in a court of law) I want a commitment from the city that this map will not only be corrected, but corrected in a fully transparent manner. Not corrected for just the damaged area in the Country, but for the entire city. I wish to know specifically how this will be done, using best science practices. Please outline the specific steps you will use to ensure the new version of the map is verifiably accurate.

As mentioned, I want a definite, specific plan. And, since Steve Nelson's firm, has shown itself to be unable to produce accurate data, I formally request that another consultant, vetted by a reputable organization, be in charge of the correction, the ground surveys, and that current best practices are used. (See attached referral list, "Environmental Integrity Resources 2017.)

Thank you for your time and attention to this very important matter. Please formally place this correspondence in the Diamond Bar General Plan Update record. I would appreciate the courtesy of detailed written answers to my questions and requests by February 15, 2018.

Respectfully,

R. Lee Paulson, Resident, Sierra Club Member
21919 Santaquin Dr.
Diamond Bar 91765
tm@silverlightpress.com

CC: Erinn Wilson, CDFW Region 5
Victoria Tang, CDFW Region 5
Kelly Schmoker CDFW Region 5
Christine Medak US Fish & Wildlife Service
Diamond Bar City Clerk

Attachment:

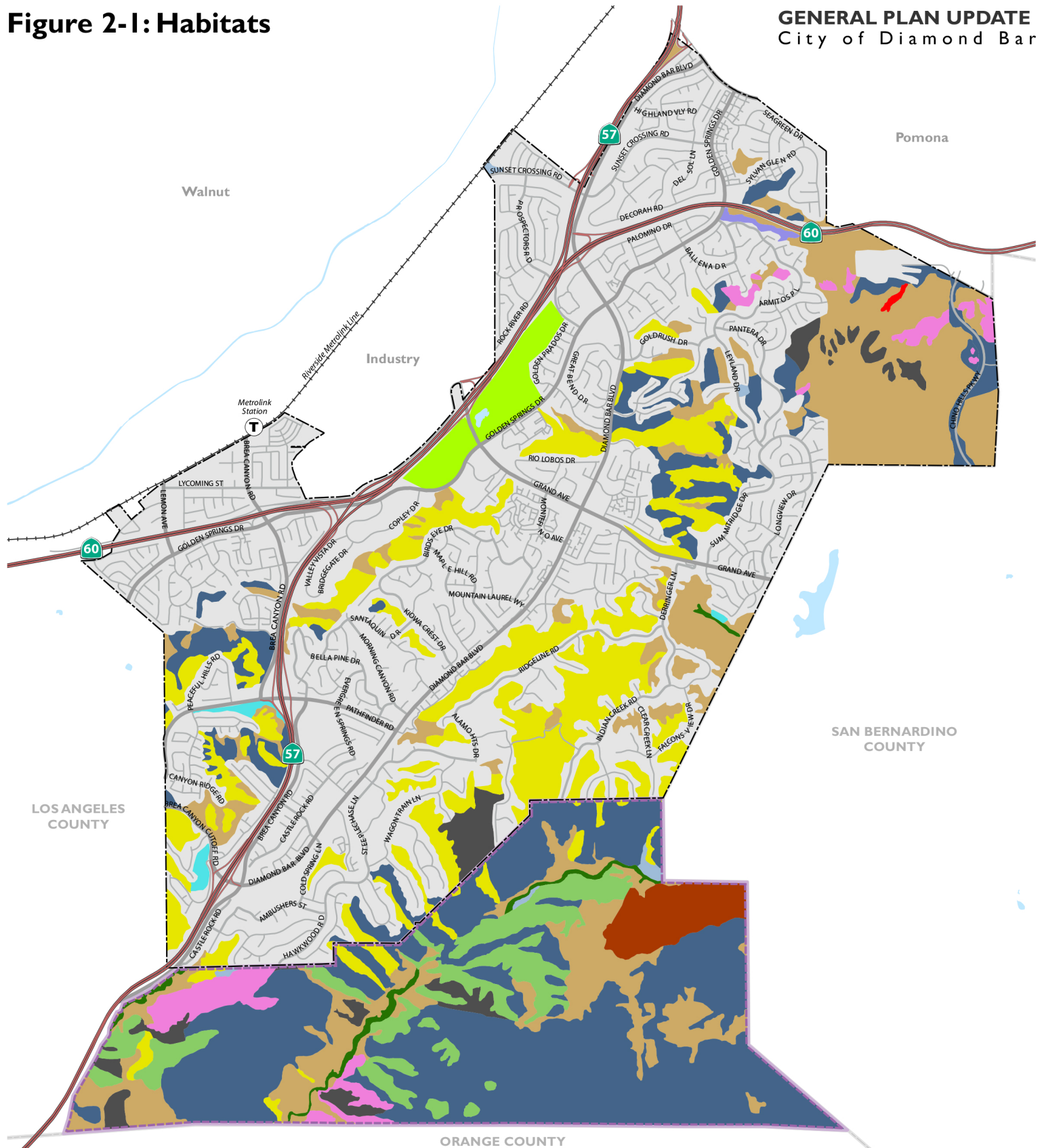
Redline Existing Conditions Habitat map

Los Angeles County, Puente Hills Oak Woodland Area Map

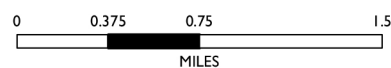
Potential Oak Woodlands Conservation areas in Los Angeles County
Map

Environmental Integrity Resources List 2017

Figure 2-1: Habitats



Source: City of Diamond Bar 2016; ESA PCR, 2016;
Dyett & Bhatia, 2016



DYETT & BHATIA
Urban and Regional Planners

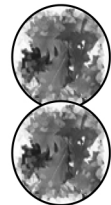
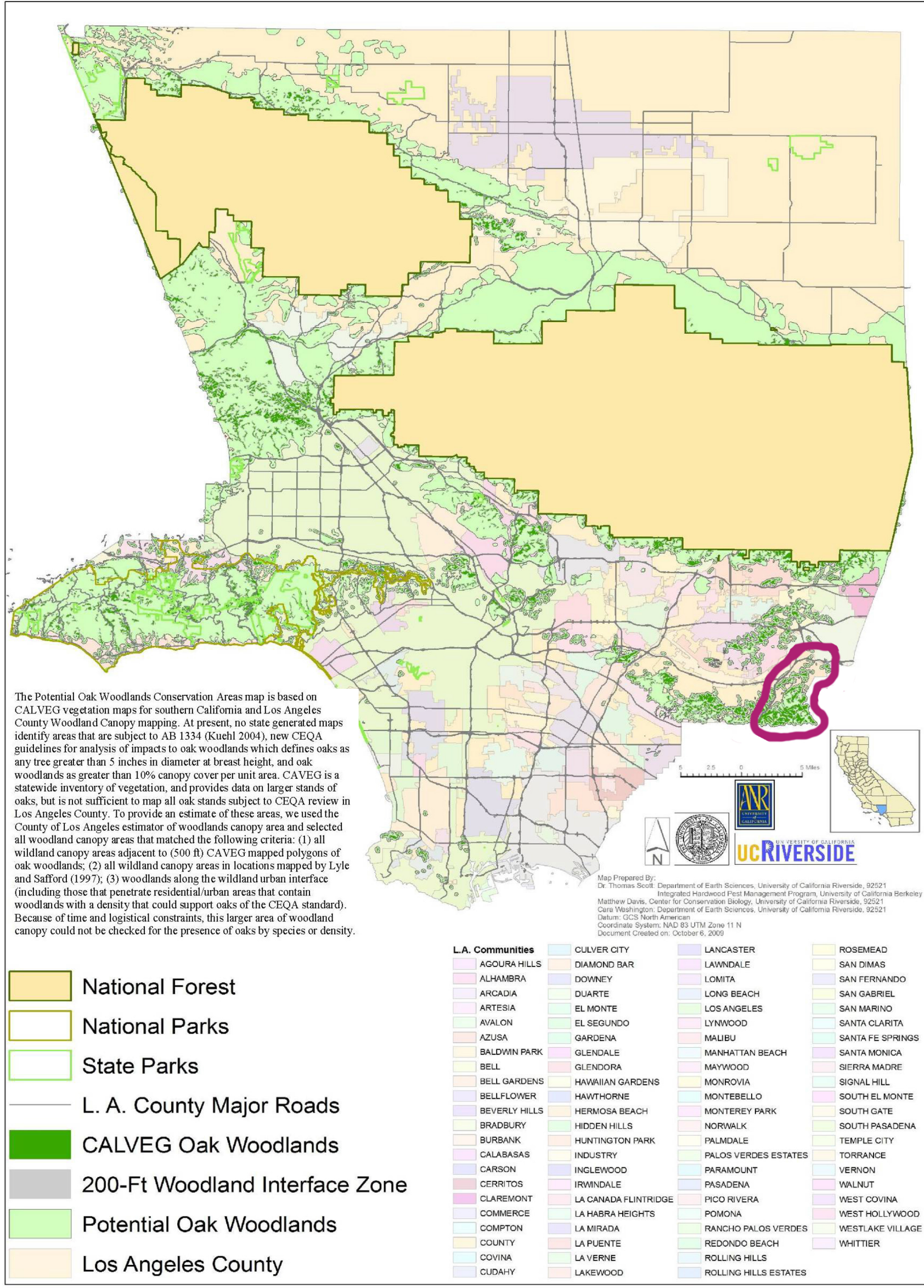
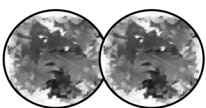


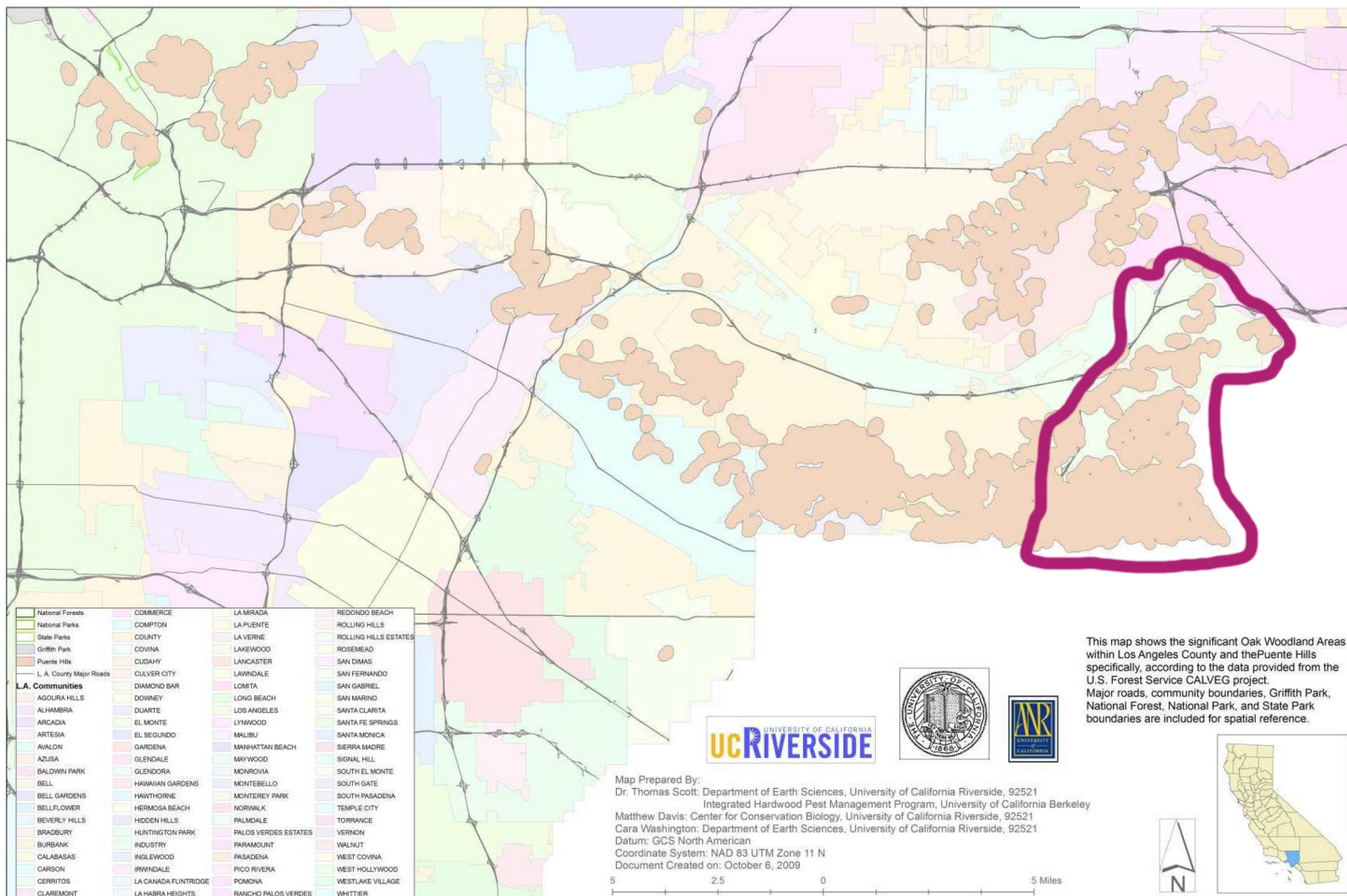
Figure 4 - Potential Oak Woodlands Conservation Areas in Los Angeles County





**Figure A5 -
Los Angeles County - Puente Hills
Oak Woodland Areas**

Los Angeles County
Oak Woodlands Conservation
Management Plan



Environmental Integrity Resources 2017

Ecological Monitoring Consultant Recommendations:

Tailored environmental support, accurate information and planning assistance available, including those that have been retained as members of SEATAC, ERB and other county open-space review boards.

- Kizh Nation Resource Management <http://knrm-nsn.us>
- Cooper Ecological Monitoring <http://www.cooperecological.com>
- Hamilton Biological <http://www.hamiltonbiological.com>
- Michael C. Long Biological Consulting,
[626-224-1525 MLongBird@gmail.com](mailto:MLongBird@gmail.com)
- Biological Assessment Services, Ty Garrison jytg@aol.com
- DNL Environmental, David Lee <http://www.dnlenvironmental.com>
david.lee@davey.com 805-946-1700
- Ricardo Motijo <https://www.biocultural.net>
montijo.ricardo.p@gmail.com

Clients include California Department of Fish, Wildlife, US Department Fish, Wildlife, Santa Monica Mountains Conservancy, Rivers & Mountains Conservancy, US Army Corp Engineers, Lead Agencies, Sierra Club Angeles Chapter, San Gabriel Mountains Monument, Hills for Everyone.



COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

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FORESTER & FIRE WARDEN

RECEIVED JUL 09 2018

July 3, 2018

Grace Lee, Senior Planner
City of Diamond Bar
Planning Division
21810 Copley Drive
Diamond Bar, CA 91765

Dear Ms. Lee:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, "DIAMOND BAR GENERAL PLAN UPDATE," WILL ALLOW THE COMMUNITY TO ESTABLISH PRIORITIES REGARDING LAND USE, PARKS AND RECREATION, PUBLIC GATHERING SPACES, MOBILITY, AND OTHER ISSUES, DIAMOND BAR, FFER 201800063

The Notice of Preparation of an Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We will reserve our comments for the Draft EIR.

LAND DEVELOPMENT UNIT:

The Land Development Unit is reviewing the proposed "DIAMOND BAR GENERAL PLAN UPDATE" project for access and water system requirements. The Land Development Unit comments are only general requirements. Specific fire and life safety requirements will be addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY
DIAMOND BAR
DUARTE

EL MONTE
GARDENA
GLEN DORA
HAWAIIAN GARDENS
HAWTHORNE
HERMOSA BEACH
HIDDEN HILLS
HUNTINGTON PARK

INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA-FLINTRIDGE
LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER

LAWDALE
LOMITA
LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES

PARAMOUNT
PICO RIVERA
POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

ACCESS REQUIREMENTS:

1. The proposed developments may require multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
 - a. The Fire Apparatus Access Road shall be cross-hatch on the site plan with the width clearly noted on the plan.
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
4. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.
5. The edge of the Fire Apparatus Access Road shall be located a minimum of 5 feet from the building or any projections there from.
6. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
7. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.
8. Provide a minimum unobstructed width of 28 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.
9. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all

portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building.

10. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Include the dimensions of the turnaround with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.
11. Fire Department Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside, and outside turning radii for each change in direction on the site plan.
12. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 lbs. and shall be surfaced so as to provide all-weather driving capabilities. Exception: For single lot single-family residential developments the Fire Apparatus Access Road must be capable of supporting the imposed load of fire apparatus weighing at least 50,000 pounds.
13. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads to clearly indicate the entrance to such road or prohibit the obstruction thereof and at intervals as required by the Fire Inspector.
14. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department access road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Clearly identify firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width on the site plan.
15. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Fire Code Section 503.2.1 shall be maintained at all times.
16. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.
17. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Clearly indicate the height of all parapets in a section view.
18. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their

background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.

19. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.
20. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.
21. This element may be located within the area described by the Fire Department as the Very High Fire Hazard Severity Zone. A "Preliminary Fuel Modification Plan" shall be submitted and approved prior to public hearing. For details, please contact the Department's Fuel Modification Unit which is located at Fire Station 32, 605 North Angeleno Avenue in the City of Azusa CA 91702-2904. They may be reached at (626) 969-5205.

PARKING ON PUBLIC FIRE APPARATUS ACCESS ROADS:

1. Provide a minimum width of 34 feet for parallel parking on one side of the Fire Apparatus Access Road with through access and with one side of the roadway being designated "No Parking – Fire Lane." Subdivision Code Section 21.24.090 (3).
2. Provide a minimum width of 34 feet for parallel parking on both sides of the Fire Apparatus Access Road when the street is designed to be a cul-de-sac less than 700 feet in-length. Subdivision Code Section 21.24.090 (2).
3. Provide a minimum width of 36 feet for parallel parking on both sides of the Fire Apparatus Access Road and/ or on cul-de-sac design with a length of 701 feet to 1,000 feet. Subdivision Code Section 21.24.090 (2).

WATER SYSTEM REQUIREMENTS:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Department Regulation 8.
2. The developments may require fire flows up to 4,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, the installation of an automatic fire sprinkler system, and type(s) of construction used.
3. The fire hydrant spacing shall be every 300 feet for both the public and the on-site hydrants. The fire hydrants shall meet the following requirements:

- a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
4. All required public fire hydrants shall be installed and tested prior to beginning construction.
5. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy.
 - a. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation.
6. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

Additional Department requirements will be determined by Fire Prevention Engineering during the Building Plan Check.

For any questions regarding the report, please contact Inspector Claudia Soiza at (323) 890-4243 or Claudia.soiza@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Grace Lee, Senior Planner

July 3, 2018

Page 6

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael Y. Takeshita", written in a cursive style.

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710



June 8, 2018

Grace Lee
City of Diamond Bar
2180 Copley Drive
Diamond Bar, CA 91765

Also sent via e-mail: glee@diamondbarca.gov

RE: SCH# 2018051066, Diamond Bar General Plan Update and Climate Action Plan Project, City of Diamond Bar; Los Angeles County, California

Dear Ms. Lee:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Gayle Totton

cc: State Clearinghouse

SENT VIA USPS AND E-MAIL:

June 12, 2018

GLee@DiamondBarCA.gov

Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive
Diamond Bar, CA 9765

**Notice of Preparation of a Draft Environmental Impact Report for the
Diamond Bar General Plan Update and Climate Action Plan**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). The SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

The SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency use its best efforts to quantify localized air emissions and perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlap should be combined and compared to SCAQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4(a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAG's MMRP for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy available here: http://scagtrpccs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project in the Draft EIR. For more information on permits,

please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or Daniel Garcia, Program Supervisor, at dgarcia@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC180605-08

Control Number



SOUTHERN CALIFORNIA
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900 Wilshire Blvd., Ste. 1700
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July 6, 2018

Ms. Grace Lee, Senior Planner
City of Diamond Bar, Planning Division
21810 Copley Drive
Diamond Bar, California 91765
Phone: (909) 839-7032
E-mail: GLee@DiamondBarCA.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Diamond Bar General Plan Update [SCAG NO. IGR9642]

Dear Ms. Lee,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Diamond Bar General Plan Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Diamond Bar General Plan Update in Los Angeles County. The proposed project includes a General Plan update for the city and its sphere of influence, totaling 13,039 acres.

When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
DIAMOND BAR GENERAL PLAN UPDATE [SCAG NO. IGR9642]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
*SCAG does not yet have an agreed-upon security performance measure.	

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Diamond Bar Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	57,800	62,400	63,900
Households	6,458,000	7,325,000	7,412,300	19,100	20,700	21,200
Employment	8,414,000	9,441,000	9,871,500	17,100	18,500	19,300

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

TO: Mr. Greg Gubman, Community Development Director
City of Diamond Bar

March 28, 2017

CC: The Honorable Mayor & City Council Members
General Plan Advisory Committee

FROM: Robin Smith – on Behalf of the Public & Diamond Bar Preservation
Foundation

[Delivered via eMail & hard copy 03-29-2017 General Plan Update Meeting]

Appeal: “City of Diamond Bar General Plan Existing Conditions, Vol. 3, Biological
Resources 2.2”.

Dear Mr. Gubman,

Thank you for your generous guidance I received in our brief chat at the planning
meeting last night. Here is the data I inquired about.

The General Plan Existing Conditions report for Biological Resources appears to be
incomplete and wholly inadequate. We assert that the February 21, 2017 version of the
Existing Conditions (specifically, vol. 3, Biological Resources 2.2) still contains many
flaws, exclusions and misnomers. Will this present report affect the baseline for future
development?

Many questions compel me to submit a citizen appeal to refrain from closing this phase
of discovery due to inaccuracies and exclusions where clarifications and corrections are
critical to preserving the health, safety and wellbeing of Diamond Bar residents.

Though Diamond Bar is largely developed, the city is built upon a variety of rare and
sensitive environmental areas, many of which are still extant in a more or less natural
state, and include a variety of native plant and wildlife habitats, (reported on many
online sources of federal, state, and NGO databases.) However, these databases were
apparently not consulted in the preparation of the document, which appears to rely
solely on a single source, the California Natural Diversity Database.

This critique is organized into several sections, as outlined below.

Research Method

Was the reconnaissance work “*ground-truthed*” through contemporary field surveys? If
so, by whom? If not, why not? What were the survey methods used, and do these
conform to current ecological surveys (e.g., U.S. Fish and Wildlife, California Native
Plant Society, <https://www.wildlife.ca.gov/Data/VegCAMP> .)

The result is obvious – the map of “Special Status Plants [sic] Species” (Figure 2-2)
shows no special-status plant species within the city limits; yet, a simple review of
herbaria collections using Calflora reveals many, including Catalina mariposa lily
(*Calochortus catalinae*). See the following maps.

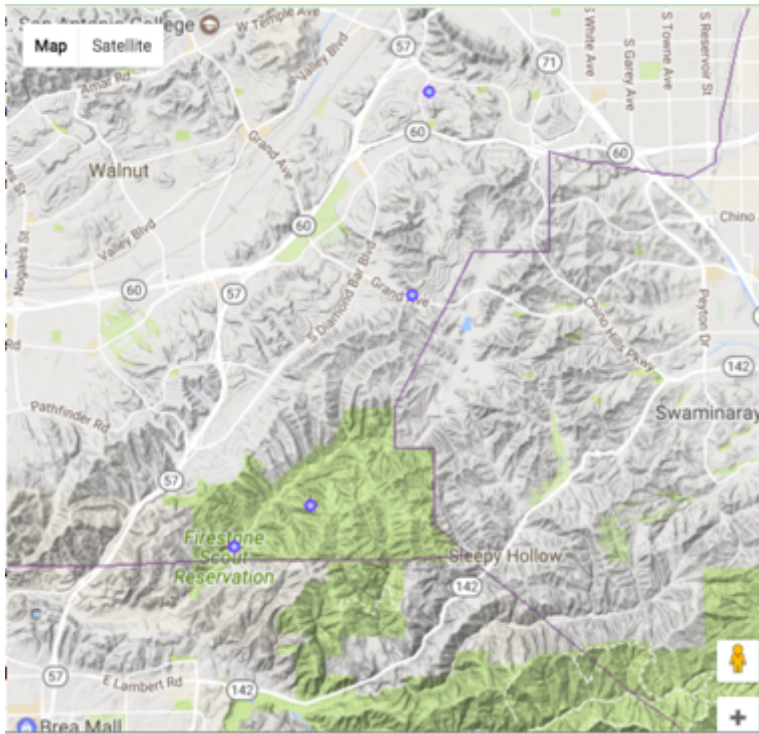


Figure 1. Blue dots represent collections of *Catalina mariposa* lily (omitted from Special Status Plant Species map).

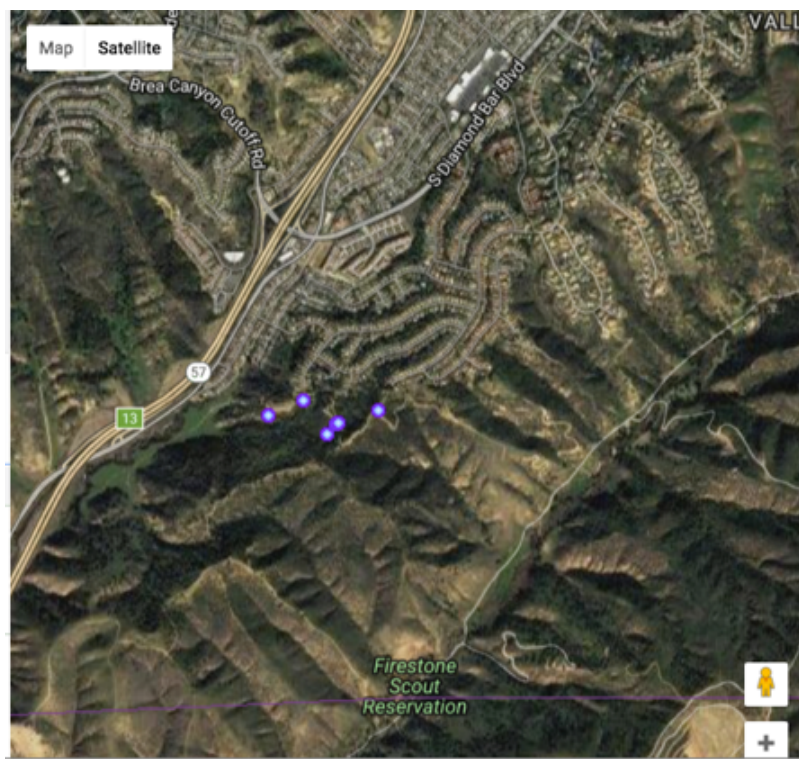


Figure 2. Collections of Intermediate mariposa lily, showing continuity of habitat into “The Country” development where it almost certainly occurs. For Special-Status Animals, the report preparers apparently neglected to check the single most data-rich source of information, eBird (www.ebird.org) which has dozens of special-status species records, many with photographs, in and around Diamond Bar. Below are some examples. (Space does not permit me here to submit all the species I have personally documented, including Golden Eagle, Merlin, Long Eared Owl.)

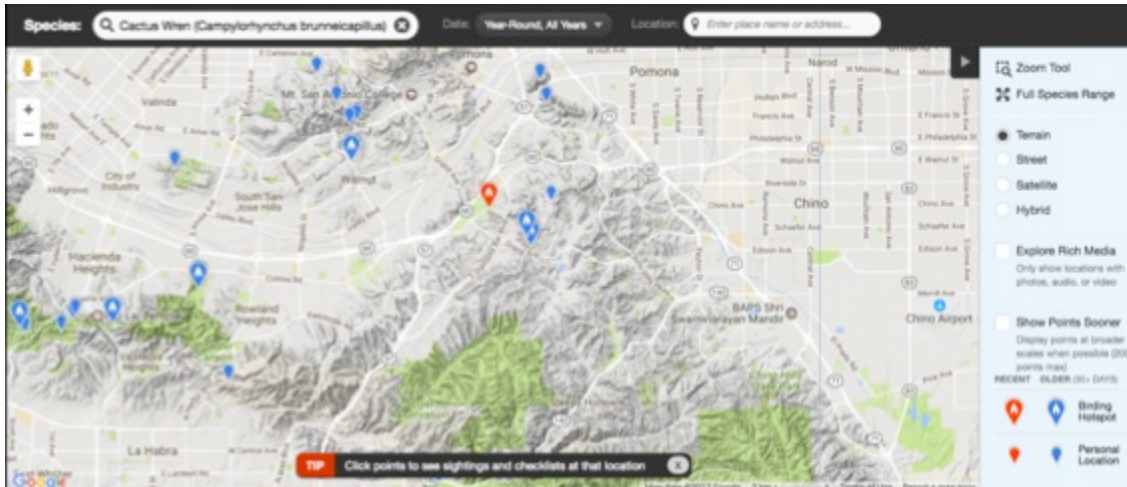


Figure 3. Distribution of Cactus Wren (California Species of Special Concern) in Diamond Bar area, from eBird.

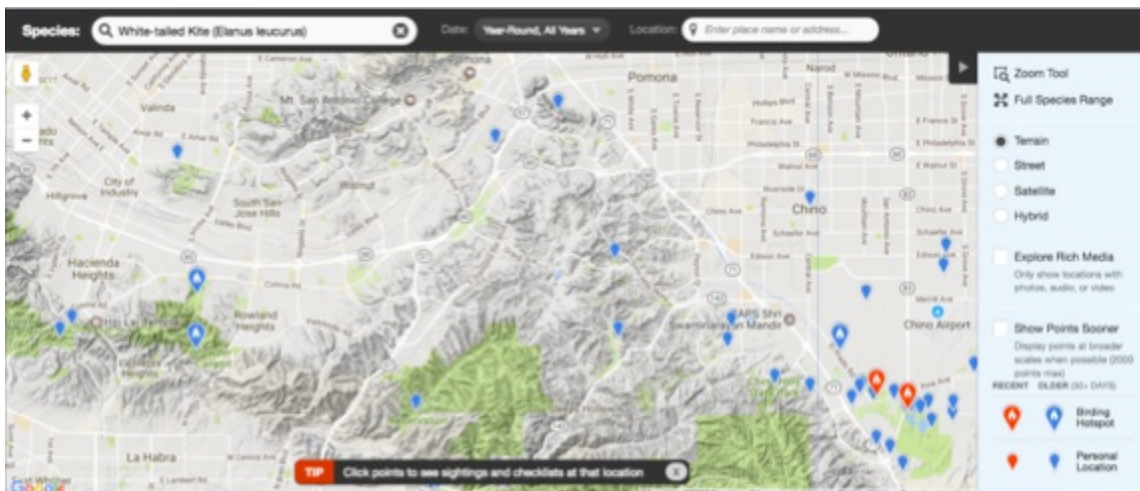


Figure 4. Distribution of White-tailed Kite (CA Fully-Protected) in Diamond Bar area, from eBird.

Text/Language Findings

The content of the report is both internally inconsistent and contrary to previous and on-going field surveys conducted by resource agencies, biological consultants, and citizen scientists, including some who are residents of or frequently work in the city of Diamond Bar.

Specifically:

1. The Coast Live Oak woodland located on the Habitat map Figure 2.1, near Armitos Place does not indicate the additional walnut/willow riparian, coastal sage scrub habitats which are there.
2. The plant community title “Venturan Coastal Sage Scrub” is inappropriate as applied to coastal sage scrub in the eastern San Gabriel Valley, which represents a mix of Venturan and Riversidean elements. The term “coastal sage scrub” is more appropriate.
3. Chaparral, a dominant vegetation type on higher ridges in and around Diamond Bar characterized by evergreen shrubs such as ceanothus and chamise, is completely omitted from the Habitat map Figure 2.1.
4. Distinctive subcommunities (alliances) of coastal sage scrub known to support rare species are not included in the habitat map, notably “Coast Prickly Pear Scrub”, which is locally abundant on south-facing slopes throughout the city.
5. Plant community descriptions under-report and/or omit floristic components and descriptors.
6. Plant community “alliances” are not described in substantial useful detail following current (e.g., Sawyer and Keeler-Wolf/SCV) terminology employed by resource agencies, County of Los Angeles Regional Planning, etc.
7. “Mixed Plant Communities” exclude mapped percentage values to justify designations preferring dominant species titles like “...walnut woodland/coast live oak woodland” vs. “coast live oak/walnut woodland,” Thus, it is impossible to ascertain, for example, the actual distribution of oak trees in the city (unless they happen to have been mapped as a distinct community.)
8. Wetland and Riparian habitats, which are distributed throughout the city wildlands, are unreported by map and text, except twice. Notably missing, Southern Coast Live Oak Riparian Forest in Tres Hermanos and Diamond Bar Creek within Steep Canyon is a significant riparian area with mature sycamores and willows. (Again, where are the “alliance” evaluations?!)
9. The contiguous relationships of wetlands, riparian habitats are unreported – i.e., how do these systems connect and interact?
10. Habitat map Figure 2.1 is internally inconsistent with the text and with ground survey facts. Example: California Walnut Woodland (pg. 15) description is inaccurate. Coast Live Oak woodland dominates woodland areas throughout the city, since it has *at least 30% presence* within many “mixed taxon woodland” designation – which merit its own taxon identity. (SCV mapping standards.)
11. The coast live oak woodland dominant presence throughout the city is minimized in the report. State conservation sources affirm the historicity and present reality. (LA County Oak Woodlands Conservation Management Plan Guide 2014 <http://planning.lacounty.gov/oakwoodlands/documents>)

12. Vegetation cover values are unreported, minimized or reported inconsistent with Survey of California Vegetation 2015 mapping standards.
(<https://www.wildlife.ca.gov/Data/VegCAMP/Mapping-Standards>)
13. Non-Native Grassland is a misleading, outdated term, inconsistent with the 2009 Grassland Initiative. <http://www.cnps.org/cnps/vegetation/grassland.php>
14. All reference to “grassland” lack factual specifics: grasslands are a *mosaic* variety of native annual, perennial forbs, grasses with invasives. Many of these natives are now extremely rare, and must be called-out (and protected) within non-native ecosystems. Examples include round-leaved filaree (*California macrophylla*) and many others. (Round-leaved filaree is observed in Diamond Bar.)
15. Non-Native Riparian (pg. 16) is incorrect. This particular native wetland (see attached map) is dominated by at least 10 mature Coast live oak, willow, walnut woodland. Which unmanaged invasive plant species have degraded the habitat, SCV cover requirements are 10% to qualify. (In actuality, there is at least 30% coverage by the oaks.)
16. Wildlife Movement, pg. 17 is simplistic. The term “corridors” is outdated/misleading; “*permeable landscape*” is the latest science applicable. (South Coast Missing Linkages Report 2011, <http://www.SCwildlands.org>)

Many other findings (not mentioned here) along with the stated discrepancies between the report and reality are in need of remedy, to keep in line with best practices and to achieve SB 379 requirements. Discrepancies especially need to be addressed promptly because the inaccurate data affects continued work on the project and will negatively affect progress, costs and a successful outcome.

Diamond Bar’s biological resources already provide strong ecosystem service benefits to the community and hold significant potential in serving the city’s future sustainability plan.

Our conservation group has been performing on-going wildlife habitat mapping throughout the city. 2016-Present findings include rare plant and animal species. Oak woodlands, a keystone species supporting wildlife, are also being inventoried via iTree.org and CalFire, using the many new conservation tools available to the public. Our work is overseen by and collaborated with conservation agencies and professionals.

We would like to collaborate with the city to conserve the health and welfare of a resilient community. Would you please explain to me if this is possible and/or how it might be accomplished?

I appreciate your consideration of my report and await a written response.

Best Regards,
Robin Smith

C. Robin Smith
Research/Development Chair
Diamond Bar is Beautiful, Wildlife Habitat, *California Native Landscape Conservation*

Exhibits & References:

1. <http://www.eBird.org>
2. CNPS: "How to Read the Alliance and Other Descriptions"
3. <http://vegetation.cnps.org/overview/descriptions>
4. Survey of California Vegetation Mapping Standards 2015 (2 documents)
5. #8. Wetland map taken from California General Plan mapping tool
6. #8 Sage Environmental Group Draft EIR, 2013, City of Diamond Bar
7. Los Angeles Oak Woodlands Conservation Guide 2014 (2 documents w/ maps)
8. #15 Wetland map taken from California General Plan mapping tool, see:
9. <http://maps.gis.ca.gov/demos/opr/genplan/webform1.aspx>
10. # South Coast Missing Linkages Report 2011, see all related current data

Additional references available on request.

Diamond Bar Is Beautiful, *Wildlife Habitat, California Native Landscape Conservation*
Diamond Bar Preservation Foundation 5013c, A Public Benefit Non-Profit Group
324 Diamond Bar Blvd. #230, Diamond Bar 91765
eMail: diamondbarbeautiful@gmail.com
909-861-9920, desk

RECEIVED JUN 26 2018

City of Diamond Bar
21825 Copely Drive
Diamond Bar, CA 91765-4178

June 20, 2018

Attention: Planning Department

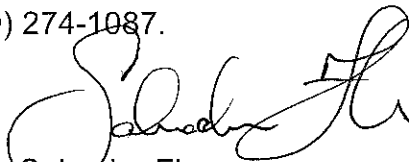
Subject: General Plan Update and Climate Action Plan – Error on Proposed
General Plan Use Diagram

Please be advised that the division of the property shown on General Plan Update and Climate Action Plan – Error on Proposed General Plan Use Diagram, will not unreasonably interfere with the free and complete exercise of any easements and/or facilities held by Southern California Edison Company within the boundaries of said map.

This letter should not be construed as a subordination of the Company's rights, title and interest in and to said easement(s), nor should this letter be construed as a waiver of any of the provisions contained in said easement(s) or a waiver of costs for relocation of any affected facilities.

In the event that the development requires relocation of facilities, on the subject property, which facilities exist by right of easement or otherwise, the owner/developer will be requested to bear the cost of such relocation and provide Edison with suitable replacement rights. Such costs and replacement rights are required prior to the performance of the relocation.

If you have any questions, or need additional information in connection with the subject subdivision, please contact me at (909) 274-1087.



Salvador Flores
Title and Real Estate Services
Real Properties

Grace Lee

From: Teresa Ruocco <TRuocco@library.lacounty.gov>
Sent: Wednesday, June 20, 2018 1:16 PM
To: Grace Lee
Cc: Lana Faye Salle; Sherry Su
Subject: Diamond Bar General Plan

Hello Ms. Lee,

This email is to inform you of our interest regarding the Diamond Bar General plan update and upcoming issuance of the draft environmental impact report (DEIR). Because the proposed site of the project falls within our jurisdiction, the initial description pertained in the notice of preparation indicates that this will indeed have an impact to library services in the immediate area. Without the DEIR, the scope of impact is not yet determinable, however, we will await receipt of this correspondence to calculate accordingly. Thank you for your attention to this matter.

Upon completion of the DEIR, please be certain to send directly to Sherry Su - SSu@library.lacounty.gov (included above).

Respectfully,

TERESA RUOCCO | STAFF ASSISTANT I

LA County Library | Support Services
7400 E Imperial Hwy, Downey, CA 90242
P: 562.940.6988
LACountyLibrary.org | @LACountyLibrary



Please note, our office is closed on Fridays.

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Diamond Bar – Pomona Valley Sierra Club Task Force

Angeles Chapter

July 6, 2018

TO: Ms. Grace Lee, Sr. Planner [delivered via electronic mail]
City of Diamond Bar, Planning Dept.

RE: City of Diamond Bar, General Plan Notice of Preparation, Comment Input

The Diamond Bar – Pomona Valley Task Force of the Angeles Chapter of Sierra Club is grateful for the opportunity to comment on the Notice of Preparation, City of Diamond Bar General Plan update.

The Diamond Bar – Pomona Valley Task Force was formed to work with local cities, Los Angeles County, political leaders and conservation agencies to seek ways to create a more livable environment by advocating conservation planning of local wildlife habitats, regional biodiversity, (California Native trees, plant communities) and passive recreational opportunities for residents.

We are particularly interested in the protection and creation of wildlife habitats, corridors, watersheds, wetlands and natural, green infrastructure within the city of Diamond Bar and sphere of influence areas. The city's biological, natural resources are critical to preserving city character, health/safety, quality of life and immeasurable ecosystem services for residents and wildlife.

For these reasons, the following input is offered:

Identifying Significant Ecological Areas:

- ◆ Recognizing city ecosystems requires identifying scientific, geographical definitions: The City of Diamond Bar is located in the Puente Hills, northern tip of the Penninsular Ranges, Southern California Coast, Southern California Mountains + Valleys ecoregions; San Dimas/Yorba Linda Quadrangles. Please denote these qualities in the environmental impact report.
- ◆ We support the identification and formalization of significant ecological areas and wildlife movement corridors within city limits and extending its borders.
- ◆ We recommend Staff benefit from conferring with the Los Angeles Regional Planning, Environmental Planning & Sustainability team to implement a City of Diamond Bar, SEA program.

Open Space Conservation, Wildlife Movement Corridors

- ◆ We support the City of Diamond Bar's participation and cooperation in establishing a wildlife corridor connecting Chino Hills State Park, City of Diamond Bar, Puente-Chino Hills Wildlife Corridor and Whittier Narrows.
- ◆ Unprotected open spaces, Upper/Mid/Lower Tonner Canyon and Aera properties are extremely important in linking currently protected wildlife habitat areas. We support prioritizing conservation planning in these areas.
- ◆ Lending scientific forward-thinking, we request the environmental impact report to recognize the contribution of city wildland linkages to wildlife support and movement beyond city boundary lines. (Native plant communities, invasive species and wildlife do not recognize man-made boundaries!)
- ◆ We ask the environmental impact report recognize "Natural Communities" plant alliances, (presently referred to as "habitats"), and as not merely islands, but with their components as a source for habitat restoration. Reference: Survey of California Vegetation Standards (SVS)
- ◆ Invasive vegetation species. We request the environmental impact report thoroughly discuss the risks and degradation caused by existing invasive vegetation species – especially Mexican fan palm and hillside plantings of Australian acacia, notably their risk to wetlands and watersheds.
- ◆ Documented observations of rare, endangered and endemic flora/fauna/insect/amphibian species are located within the city of Diamond Bar. Diamond Bar also has critical wetlands traversing the city. We request a thorough identification of these resources, and discussion of the potential impacts be stated in the environmental impact report

Land Use, Safety, Hillside Preservation

- ◆ Residential development projects bordering wildlands; categorical exemptions. We request CEQA categorical exemptions be denied on projects which potentially impact the wildland interface they overlay and align. Human safety, watersheds, soil stability and sensitive species may be compromised. Even a single old growth oak tree provides soil stability, a critical function, given Diamond Bar's landslide status and seismic risk. We request the existing remnants of smaller natural open space be considered for preservation and/or enhanced to support human safety, watersheds, green infrastructure and create habitat connectivity to larger parcels. We request the environmental impact report thoroughly discuss this complex topic.
- ◆ Cumulative impacts of concurrent, multiple development projects, especially those bordering wildland areas, may degrade natural resources. We request all projects bordering wildland, require a 200 ft. protective buffer which is commensurate in supporting local California native plant communities.
- ◆ We request old development projects bearing formerly granted permits, but not yet active, be denied "grandfathered" MND/EIR approvals, and instead be required to perform current protocol surveys.

Land Use, Tree Protection Policy, Hillside Management, Climate Action Plan

- ◆ Land designated as open space by deed (dedication, condition, covenant, or restriction), open space easement, or map restriction should not have its protections revised, terminated, abandoned, or removed.
- ◆ Existing and proposed Hillside Management policies are inefficient and unsafe. Given the status of USGS/California “Deep Landslide Susceptibility” assessment, we request the environmental impact report thoroughly discuss how human safety and hillside natural infrastructure is preserved.
- ◆ City tree protection codes are outdated, inefficiently enforced and are both, internally inconsistent and ignore the Los Angeles County Oak Woodland Conservation Management Plan. We request the Oak Woodland Conservation Management Plan be adopted by the City of Diamond Bar and recommend native tree protection codes be updated to comport with the state “Natural Communities” vegetation alliance curriculum.
- ◆ California's oak woodlands store an estimated 675 million metric tons of carbon dioxide (CO2) in trees and the understory. Every ton of CO2 released into the atmosphere by oak woodland destruction represents a measurable potential adverse environmental effect. The California Environmental Quality Act requires the analysis and mitigation of potential effects of greenhouse gas emissions related to conversion of oak woodlands.
- ◆ The City of Diamond bar Climate Action Plan should include a thorough discussion and consideration of the values of it existing oak woodland, California Native landscapes, wildlife habitat, green space, watershed, wetlands, as contributing to a successful plan.

On behalf of our Sierra Club group and the citizens of Diamond Bar, I appreciate being allowed to contribute to the City of Diamond Bar’s environmental impact report process.

Sincerely,

C. Robin Smith, Chair (City of Diamond Bar, resident)

Diamond Bar – Pomona Valley Sierra Club Task Force

324 S. Diamond Bar Blvd. #230

Diamond Bar, CA 91765

DBPVSierraClubTaskForce@gmail.com

909-861-9920 Desk

cc: City of Diamond Bar, Community Development Director, Greg Gubman
Sierra Club, Angeles Chapter, Conservation Chair, Angelica Gonzalez



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

Douglas Barcon

Comment:

multiple comments on EIR and G.P.



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

Robin Smith

Comment:

Q

consideration

conservation Element

green Infrastructure



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

Allen Wilson

Comment:



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

Jim Hays

Comment:

Air pollution

Water Pollution

Noise Pollution



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN

Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

Grace Lim-Hays

Comment:



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN

Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

MARY Busse

Comment:



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

20850 Gold Run Dr
D CA

Name:

GARY Busteed

Comment:



DIAMOND BAR
GENERAL PLAN UPDATE

GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN Environmental Impact Report Scoping Comments

Please let us know if you have any comments on the scope and/or content of the EIR. Please focus on the range of environmental issues that the EIR should consider, including potential impacts of the project and alternatives.

Name:

Teresa Wang

Comment:

How does the city of Diamond Bar plan
on enforcing its Tree Protection Codes and
what are the consequences for developers and
individuals who violate those?