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October 30, 2019

Governor's Office of Planning & Research

**OCT 30 2019**

**STATE CLEARINGHOUSE**

Ms. Grace Lee  
City of Diamond Bar  
21810 Copley Drive  
Diamond Bar, CA 91765  
[Glee@DiamondBarCA.gov](mailto:Glee@DiamondBarCA.gov)

**Subject: Draft Environmental Impact Report for the Diamond Bar Comprehensive General Plan Update and Climate Action Plan, City of Diamond Bar, Los Angeles County**

Dear Ms. Lee:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the Diamond Bar Comprehensive General Plan Update and Climate Action Plan (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

## **Project Description and Summary**

**Objective:** The proposed Project is an update to the City of Diamond Bar (City) General Plan. The General Plan is a long-term policy document guiding future land use and policy decisions. The City's current General Plan was adopted in 1995. In 2016, the City began the process of comprehensively updating the General Plan.

**Location:** City of Diamond Bar (Citywide), Los Angeles County.

## **Comments and Recommendations**

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

## **Project Description and Related Impact Shortcoming**

### **Comment #1: Impacts to Special-Status Plant Species**

**Issue:** Mitigation Measures MM-BIO-1 A-C dictate the City's actions taken to mitigate impacts to any special-status plants that may be found within the City limits. These measures refer to US Fish and Wildlife Service (USFWS) oversight, but do not acknowledge CDFW protocol.

**Specific impact:** CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive species.

**Why impact would occur:** Project implementation includes grading, vegetation clearing for construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species.

**Evidence impact would be significant:** Impacts to special status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW recommends conducting focused surveys for sensitive/rare plants on-site and disclosing the results in the DEIR. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018) (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>), a qualified biologist should "conduct surveys in the field at the time of year when species are both evident



and identifiable. Usually this is during flowering or fruiting.” The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from project-related direct and indirect impacts.

**Mitigation Measure #2:** In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at <http://vegetation.cnps.org/>. To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

**Mitigation Measure #3:** CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (Assembly Bill 1094; Government Code, §§ 65965-65968).

#### **Comment #2: Inadequate Survey Protocols for Special-Status Wildlife**

**Issue:** Mitigation Measure MM-BIO-1E indicates that future projects taking place within the City will require a clearance survey within one week of initiating ground disturbance. This measure also states that “[I]f any special-status animals are found on the site, a qualified biologist(s) with a CDFG Scientific Collecting Permit shall relocate these species to suitable habitats within surrounding open space areas that would remain undisturbed, unless the biologist determines that such relocation cannot reasonably be accomplished”.

**Specific impacts:** While MM-BIO-1E does dictate that CDFW will be consulted regarding relocation, it does not fully convey the appropriate protocols for a variety of sensitive species.

**Why impacts would occur:** Inadequate survey protocols will likely lead to impacts to a variety of sensitive species as this process may overlook or fail to identify listed species and supporting habitat necessary for their survival.

**Evidence impact would be significant:** Ground clearing and construction activities could lead to the direct mortality of a listed species or species of special concern. The loss of occupied habitat could yield a loss of foraging potential, nesting sites, basking sites, or refugia and would constitute a significant impact absent appropriate mitigation. CDFW considers impacts to CESA-listed and Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW recommends that future proposed projects within the City of Diamond Bar follow the appropriate survey protocol for a given species, since the suggested measures, MM-BIO-1 seq., do not make distinctions among the breadth of wildlife species found throughout the Los Angeles Basin. Based on the listing status of a given wildlife species found on a future project site, the mitigative response will vary.

**The following mitigation measures are suggested by CDFW for impacts to reptiles:**

**Mitigation Measure #1:** To mitigate impacts to SSC, CDFW recommends focused surveys for the species. Surveys should typically be scheduled when these animals are most likely to be encountered, usually conducted between June and July. To achieve 100 percent visual coverage, CDFW recommends surveys be conducted with parallel transects at approximately 20 feet apart and walked on-site in appropriate habitat suitable for each of these species. Suitable habitat consists of areas of sandy, loose and moist soils, typically under the sparse vegetation of scrub, chaparral, and within the duff of oak woodlands.

**Mitigation Measure #2:** In consultation with qualified biologist familiar with the life history of each of the SSC, a relocation plan (Plan) should be developed. The Plan should include, but not be limited to, the timing and location of the surveys that will be conducted for this species, identify the locations where more intensive survey efforts will be conducted (based on high habitat suitability); identify the habitat and conditions in any proposed relocation site(s); the methods that will be utilized for trapping and relocating the individuals of this species; and the documentation/recordation of the number of animals relocated. CDFW recommends the Plan be submitted to the Lead Agency for approval 60 days prior to any ground disturbing activities within potentially occupied habitat.

**Mitigation Measure #3:** The Plan should include specific survey and relocation efforts that occur during construction activities for the activity period of these reptiles (generally March to November) and for periods when the species may be present in the work area but difficult to detect due to weather conditions (generally December through February). Thirty days prior to construction activities in coastal scrub, chaparral, oak woodland, riparian habitats, or other areas supporting this species, qualified biologists should conduct surveys to capture and relocate individual reptiles to avoid or minimize take of these special-status species. The Plan should require a minimum of three surveys conducted during the time of year/day when these species most likely to be observed. Individuals should be relocated to nearby undisturbed areas with suitable habitat.

**Mitigation Measure #4:** If construction is to occur during the low activity period (generally December through February), surveys should be conducted prior to this period if possible. Exclusion fencing should be placed to limit the potential for re-colonization of the site prior to construction. CDFW further recommends a qualified biologist be present during ground-disturbing activities immediately adjacent to or within habitat, which supports populations of this species.

**The following mitigation measures are suggested by CDFW for impacts to nesting birds:**

**Mitigation Measure #1:** To protect nesting birds that may occur on-site, CDFW recommends that the final environmental document include a measure that no construction shall occur from February 15 through August 31. If construction is unavoidable during February 15 through August 31, a qualified biologist shall complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction.

**The following mitigation measures are suggested by CDFW for impacts to raptors:**

**Mitigation Measure #1:** To protect nesting birds that may occur on-site, CDFW recommends that the final environmental document include a measure that no construction shall occur from February 15 through August 31. If construction is unavoidable during February 15 through August 31, a qualified biologist shall complete surveys for nesting bird activity the orders *Falconiformes* and *Strigiformes* (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections 3503 and 3503.5, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird-of-prey.

**Mitigation Measure #2:** CDFW cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the Project area, or that such species have some potential to occur on, or in, the vicinity of the Project area, due to the presence of suitable habitat.

**The following mitigation measures are suggested by CDFW for impacts to bats:**

**Mitigation Measure #1:** The CEQA document should provide a thorough discussion of potential impacts to bats from construction and operation of the Project to adequately disclose potential impacts and to identify appropriate avoidance and mitigation measures.

**Mitigation Measure #2:** Measures to mitigate for impacts to bats should include pre-construction surveys to detect species, use of bat roost installations, and preparation of a bat protection and relocation plan to be submitted to CDFW for approval prior to commencement of project activities.

**Mitigation Measure #3:** CDFW recommends the Project avoid removal of trees that may be used by bats or avoid buildings or other occupied habitat for any species of bat. If bats cannot be avoided by Project activities and a bat specialist determines that roosting bats may be present at any time of year, it is preferable to push any tree down using heavy machinery rather than felling the tree with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, the tree should be pushed lightly two to three times, with a pause of

approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly. The bat specialist should determine the optimal time to disturb occupied bat habitat to maximize bats escaping during low light levels. Downed trees should remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts should not be sawn-up or mulched immediately. A period of at least 24 hours (preferably 48 hours) should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building. In addition, CDFW recommends that the Project include measures to ensure that bat habitat remains available for evicted bats or loss of bat habitat resulting from the Project, including information on the availability of other potential roosts that could be used by bats within protected open space on or near the Project site.

### **Comment #3: Impacts to CESA-Listed Species**

**Issue:** There are multiple listed species with the potential to occur on the Project site.

**Specific Impacts:** Project related activities, such as grading, road construction, or housing construction could lead to the direct or indirect mortality of listed animal and/or plant species.

**Why impact would occur:** Take of special status plant species, including ESA and CESA-listed species, may occur without adequate detection, avoidance and mitigation measures.

**Evidence impacts would be significant:** CDFW considers adverse impacts to special status species protected by CESA and the federal Endangered Species Act (ESA, 16 U.S.C. §1531 *et seq.*), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any state endangered, threatened, candidate species, or listed rare plant species pursuant to the NPPA that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Take is defined in Section 86 of the Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”. Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species protected under CESA.

### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant or animal species designated as rare, endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an ITP or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subs. [b],[c]). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.



#### **Comment #4: Accuracy of Tree Surveys**

**Issue:** There are conflicting tree surveys for the City of Diamond Bar, one presented by the City (*Diamond Bar Environmental Impact Report 2040*) and one provided by a concerned group of citizens (*Biological Resources Report for Open Space & Conservation Element Diamond Bar General Plan Update*). Between these sources, there is uncertainty in the accuracy of vegetation surveys, their accounting of oak and walnut woodlands, and the resulting mitigation.

**Specific Impact:** The classifications of oak woodlands, walnut woodlands, riparian woodlands, and California walnut/Coast live oak woodland are inconsistent among the publicly available surveys provided in support of the DEIR. Based on the tree surveys provided for a given project, the potential impacts and their subsequent mitigation may vary greatly.

**Why impact would occur:** If a habitat is misidentified, then the mitigative restored/replaced habitat may be of a different type, resulting in a habitat-type conversion and loss of the original habitat.

**Evidence impact would be significant:** CDFW is concerned that inaccurate surveys of tree species as part of this Project would contribute to the degradation of natural open space or riparian habitats found within the City limits. CDFW is concerned that by not requiring all native trees and plants be replaced by similar native tree and plant species, the replacement trees would not be fully mitigating the function and value of the impacted native tree species.

In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at <http://vegetation.cnps.org/>. To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** Prior to completion of the Final Environmental Impact Report, the discrepancies between publicly available tree and vegetation surveys for the study area should be resolved by classifying vegetation according to the MCV.

#### **Comment #5: Inadequate Oak and Walnut Woodlands Mitigation**

**Issue:** The DEIR states that oak and walnut trees will be planted or transplanted, at a ratio of at least 1:1.

- Page 3.3-54 states that future project mitigation will “Acquire oak woodland habitat that is comparable to the habitat that was impacted at a ratio of 1:1.”
- Page 3.3-55 states that future project mitigation will “Acquire walnut woodland habitat that is comparable to the habitat that was impacted at a ratio of 1:1.”

**Specific Impact:** Oak woodland and walnut woodland alliances are considered rare communities and should be mitigated as an ecosystem. Oak and Walnut woodlands are a community that includes the trees, as well as any understory plants, duff, dead logs, etc. Removal or thinning of an understory in woodland directly impacts the function of the entire woodland.

**Why impact would occur:** Based on the tree surveys provided for a given project, the potential impacts and their subsequent mitigation may vary greatly. If a habitat is misidentified, then the mitigative restored/replaced habitat may be of a different type, resulting in a habitat-type conversion and loss of the original habitat.

**Evidence Impact would be significant:** A functioning woodland system does not solely include trees. There is an important understory component which needs to be figured into the impact analysis and mitigation proposal to fully mitigate impacts to rare and sensitive CDFW plant communities, such as oak woodlands and walnut woodlands. The DEIR does not describe what species these trees are, where they occur, how many will be removed, or how large they are. CDFW is unable to concur with any proposed mitigation measures without knowing first what will be impacted.

Correct mapping of recognized vegetation alliances is vital to disclose actual acreage-based impacts to these tree-dominated vegetation community, as well as ensure they are adequately mitigated. CDFW was unable to verify the validity of several vegetation communities listed in the DEIR as recognized alliances, therefore unable to determine if they are sensitive vegetation communities. Including the scientific names for alliances as well as a thorough description of the membership requirements of each alliance would be helpful for validating the assessment completed. Each future project within the City should provide this information to CDFW for review in an environmental document.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW recommends avoiding impacts to the oak or walnut woodland communities. If avoidance is not feasible, the City should minimize impacts to the maximum extent possible. Any impacts to the oak or walnut woodland communities should be mitigated at a minimum 10 acres of preservation/restoration for every 1 acre of impact. All mitigation should be held to quantifiable success criteria, including species diversity, species richness, abundance, percent cover, and non-native cover below 5 percent. Success criteria should be based on the composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free and the metrics for success have remained stable for at least 5 years.

**Mitigation Measure #2:** CDFW recommends off-site habitat preservation of rare and sensitive vegetation communities (i.e., oak woodland, walnut woodland, etc.) at a ratio of at least 10:1 for impacts to these resources. Additionally, planting more trees in the existing on-site habitat at an excessive density should be avoided as it could result in an impact to that habitat.

**Mitigation Measure #3:** For all native trees not classified as a rare vegetation community according to MCV, CDFW recommends mitigating for those trees impacted by the Project at a 5:1 ratio for both the acreage of impact as well as the number of trees.



**Mitigation Measure #4:** CDFW recommends that all open space preservation/mitigation land be protected in perpetuity with minimal human intrusion by recording and executing a perpetual conservation easement in favor of an approved agent dedicated to conserving biological resources. In addition, CDFW recommends all mitigation lands be owned or managed by an entity with experience in managing habitat. Mitigation lands should be owned or managed by a conservancy or other land management company to allow for legal remedies should trespass and clearing/damage occur. A management and monitoring plan, including a funding commitment, should be developed for any conserved land, and implemented in perpetuity to protect existing biological functions and values.

#### **Comment #6: Impacts to Streams**

**Issue:** Mitigation Measure MM-BIO-3 Jurisdictional Waters discusses the need for consultation with regulating agencies regarding impacts to riparian resources and potential mitigation but does not indicate the need for notification for a Lake and Streambed Alteration Agreement with CDFW.

**Specific impacts:** The Project may result in the loss of streams and associated watershed function and biological diversity. Grading and construction activities will likely alter the topography, and thus the hydrology, of the Project site.

**Why impacts would occur:** Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream streams and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

**Evidence impacts would be significant:** The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project.

#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** The Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

CDFW's issuance of an LSA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. However, the DEIR does not meet CDFW's standard at this time. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

**Mitigation Measure #2:** Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of mitigation lands in perpetuity.

### **Filing Fees**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

### **Conclusion**

We appreciate the opportunity to comment on the Project to assist the City of Diamond Bar in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines; § 15073(e)]. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at [Andrew.Valand@wildlife.ca.gov](mailto:Andrew.Valand@wildlife.ca.gov) or (562) 342-2142.

Sincerely,



Erinn Wilson  
Environmental Program Manager I

cc: CDFW

Victoria Tang – Los Alamitos  
Andrew Valand – Los Alamitos  
Kelly Schmoker - Pasadena  
Joseph Stanovich – Los Alamitos

Scott Morgan (State Clearinghouse)

**References:**

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