



# City of Diamond Bar

21825 Copley Drive • Diamond Bar, CA 91765-4178

(909) 839-7000 • Fax (909) 861-3117

[www.CityofDiamondBar.com](http://www.CityofDiamondBar.com)

September 17, 2009

Ms. Martha Crusius  
Senior Planner, National Parks Service  
1111 Jackson Street, Suite 700  
Oakland, CA 94607

Dear Ms. Crusius,

Thank you for meeting with Diamond Bar Mayor Pro Tem Carol Herrera and members of City staff earlier this month to discuss the National Parks Service's (NPS) San Gabriel Watershed and Mountains Special Resource Study. The City of Diamond Bar remains concerned with the course of the Study and its potential impacts on our community and on local governments around the region. Please accept this letter as the City's official written comments to the Study's proposed Preliminary Alternative Concepts as described in Newsletter #4.

## 1. Preliminary Alternative Concepts

Newsletter #4 identifies three Preliminary Alternative Concepts for the Study Area, as follows:

- Alternative Concept "A" designates the already protected San Gabriel Mountains as a National Recreation Area managed by the U.S. Forest Service.
- Alternative Concept "B" creates the San Gabriel Parks and Open Space Network of interconnected parks and open spaces managed by an undefined public/private partnership.
- Alternative Concept "C" creates the San Gabriel Watershed National Recreation Area, encompassing the San Gabriel River, its upper watershed, and associated trails, access points, and adjacent public lands, and would be managed by a partnership of federal agencies.

The City of Diamond Bar finds Concepts "A" and "C" to be the most appropriate alternatives for consideration in the final report, as they most closely follow the Congressional guidelines established for the Study.

The City is adamantly opposed to the consideration and inclusion of Alternative Concept "B" in the Study for a variety of reasons, as described in further detail in the following sections.

Ron Everett  
Mayor

Carol Herrera  
Mayor Pro Tem

Wen P. Chang  
Council Member

Jack Tanaka  
Council Member

Steve Tye  
Council Member

## 2. Study Area

The San Gabriel River Watershed Study Act, passed by Congress in 2003 established clear boundaries for the Department of Interior/National Parks Service to follow when conducting the Study. These carefully defined areas include the "San Gabriel River and its tributaries north of and including the City of Santa Fe Springs" as well as the "San Gabriel Mountains within the territory of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy". As such, NPS may only include properties within these clearly defined areas in their Study.

Preliminary Alternative Concept "B" includes maps identifying properties located within the Coyote Creek tributary as Nationally Significant Areas, including some within Diamond Bar's city limits and sphere of influence. As the only tributary located south of the City of Santa Fe Springs, and therefore outside the Congressionally-authorized Study Area, properties in the Coyote Creek tributary watershed should not be eligible for NPS consideration. The City of Diamond Bar again requests that the NPS remove all properties in the Coyote Creek tributary watershed from the Study Area to meet the terms established by Congress.

## 3. National Significance & Suitability

Newsletter #4 finds the Puente/Chino Hills to be nationally significant due to its "rare native plant communities, including coastal sage scrub habitat and walnut woodlands". These features therefore render the area as suitable for inclusion in the National Parks system because they represent a "unique combination of themes and resources not found in other national parks or comparably protected areas". These determinations are made by NPS after completing a thorough comparative analysis that addresses the rarity of the resources, interpretive and educational potential, and examines other similar resources already protected privately or by other local, state, or federal stewardship. Unfortunately, this analysis has not been made available publicly, and without the opportunity to review its findings, the determination that Puente/Chino Hills are nationally significant and suitable for inclusion in the national park system is questionable. This is particularly true when considering that the "rare plant communities, including coastal sage scrub and walnut woodlands" found by NPS in the Puente/Chino Hills area, are, in fact, already publicly protected by the State of California in the 14,102 acre Chino Hills State Park.

Furthermore, Preliminary Alternative Concept "B" identifies properties not included in the map of Nationally Significant Areas. If these properties are not identified as Nationally Significant, they seemingly fail NPS suitability requirements for inclusion in the national park system.

#### 4. Local Land Use Concerns

Preliminary Alternative Concept "B" proposes to create a San Gabriel Parks and Open Space Network managed by "a partnership of land management agencies, conservation organizations, and recreation interests". Any NPS designation or inclusion of any properties in such a "network" proposed to be governed under such a vague management structure leads to significant local land use concerns. All land use decision-making authority should remain that of the local agency without exception or interference.

The City of Diamond Bar appreciates the careful consideration of these comments as the Draft Study Report is developed and urges NPS to remove Preliminary Alternative Concept "B" from consideration. Should you have further questions regarding the City's comments, please contact Ryan McLean, Assistant to the City Manager, at 909-839-7016.

Sincerely,

A handwritten signature in black ink, appearing to read 'James DeStefano', written over a horizontal line.

James DeStefano  
City Manager, City of Diamond Bar