

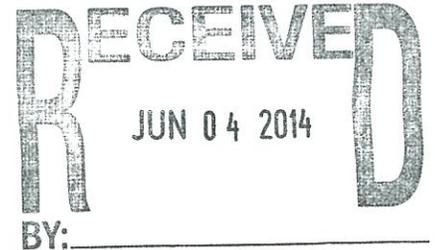
Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
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Eldon Heaston, Executive Director
In reply, please refer to AV0614/055

June 2, 2014

Ms. Emma Howard
Los Angeles County, Department of Regional Planning
320 W. Temple Street, Room 1354
Los Angeles, CA 90012



RE: Requested Change to Significant Ecological Areas Ordinance

Dear Ms. Howard,

The Antelope Valley Air Quality Management District (AVAQMD) works in partnership with the Antelope Valley communities to achieve and preserve the air quality in the region through effective programs that promote corporate, community and individual responsibility for air quality while maintaining a strong pro-business approach.

We recently reviewed the proposed boundary expansion of the Significant Ecological Areas (SEA) within the Antelope Valley. Our review indicated that the proposed boundary expansions will overlap the Mineral Resource Zones (MRZ) located within the Big Rock wash. We note that MRZs are designated by the State to highlight these natural mineral resources as significant, and aid Lead Agencies in the preservation of locally sourced mineral resources. We are concerned that the proposed SEA requirements will discourage the production of locally sourced aggregate materials, resulting in significant increases in importing non-local material.

Transitioning from locally produced aggregate material to imported materials may greatly increase criteria and greenhouse gas (GHG) emissions due to an increase in vehicle miles traveled while transporting the material. The Antelope Valley already has a large housing to jobs imbalance that results in over 60,000 Antelope Valley residents commuting daily into the Los Angeles basin to work. This commuter traffic is a significant contributor to the Antelope Valley's non-attainment status with the ozone standard in the federal Clean Air Act. The AVAQMD has worked hard to promote clean and responsible job growth in the Antelope Valley as a viable approach to reduce emissions from commuter traffic to improve the local air quality.

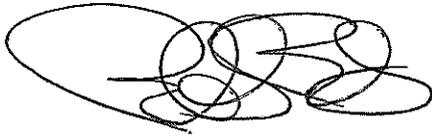
Caltrans has performed analysis that demonstrates the benefits of using local material supplies. Based on Caltrans' analysis, if material haul trips can be reduced on average by 15 miles, then:

- Diesel fuel consumption would be reduced by 44 million gallons.
- Less diesel fuel burned reduces local air pollutants, eliminates emission of toxic diesel particulates and dramatically reduces greenhouse gas emissions.

The SEA Ordinance exempts uses which have supplemental regulations that balance development and preservation within the SEA areas. The Surface Mining and Reclamation Act of 1975 (SMARA) requires balancing mine development with post mining reclamation. The AVAQMD believes the SEA Ordinance exemption should include SMARA compatible operations.

We strongly encourage a revision to the SEA Ordinance to provide an exemption to current and future SMARA compliant facilities. Such action will support cleaner air within the Antelope Valley, promote local job creation, support the goals of AB 32 and validate sustainable local community planning concepts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bret Banks', enclosed within a large, loopy oval scribble.

Bret Banks
Operations Manager