



June 2, 2014

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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 Board of Trade (AVBOT) is very concerned about how the Proposed Significant Ecological Area (SEA) overlay will affect local construction aggregate material availability. AVBOT believes the proposed Antelope Valley SEA expansion will have significant negative impacts to locally sourced construction material thereby requiring future import of material from outside the County to meet local market needs.

Locally sourced aggregate materials provide many economic and environmental benefits:

- Local jobs,
  - Reduced construction costs due to long haul distances,
  - Reduced greenhouse gas emissions associated with trucking,
  - Retention of public funds spent on public infrastructure construction within the economies taxed to fund said projects,
  - Reduced road congestion associated with material hauling, and
- Reduced road pavement determination from fewer lane miles traveled.

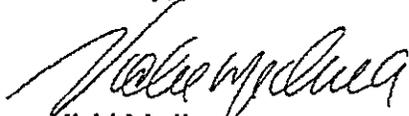
To illustrate the financial impacts associated with hauling aggregate materials longer distances, AVBOT notes that the State of California estimates the price of aggregate increases about 15 cents per ton for every mile that it is hauled, and to construct one mile of six-lane interstate highway requires about 113,500 tons of aggregate. Transporting this amount of aggregate 30 miles adds \$510,000 to the base cost of the material.

AVBOT considers our transportation systems are critical to our quality of life, the social and environmental health of the Antelope Valley, and our economic contribution to Northern Los Angeles County. Locally sourced materials will decrease hauling impacts, strengthen our local economies, and improve the quality and safety of our local transportation networks.

We note that the SEA Ordinance exempts uses which have supplemental regulations that balance development and preservation within the SEA areas. We further note that Surface Mining and Reclamation Act of 1975 (SMARA) balances mine development with post mining reclamation. As such, and for the reasons listed in this correspondence, AVBOT requests that SMARA compliant facilities and future projects be exempt from the SEA ordinance.

For over fifty-six years the mission of the Antelope Valley Board of Trade has been *"to promote diverse business and industry, quality infrastructures, and a strong legislative voice for the benefit of our members and the greater Antelope Valley."*

Sincerely,



Vicki Medina  
Executive Director



John Currado  
Transportation Committee Chair