

Comments on the SEA Program received between April 23, 2014 and July 22, 2014

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- SESPE Consulting June 19, 2014
- SoCalGas Aliso Canyon, Tony Klecha June 5 2014 (1-3)
- Theresa Brady June 21, 2014
- WCCA May 23, 2014

From: [Emma Howard](#)
To: "Hubsch, Allen W."
Subject: RE: SEA Ordinance Draft 5
Date: Wednesday, June 18, 2014 6:27:55 PM

Allen,

It will be reflected in our public comments regarding SEA boundaries. Right now the day that we would bring this information to the Regional Planning Commission is August 6th, so we'd get the information out to the public about 2 weeks before, which would be July 24th. So the latest you'd hear from me is July 24th, but expect me to call you or email you if I need extra information sometime between July 7th and July 17th. That is provided our schedule does not change, which sometimes happens. If the schedule changes, nothing would happen sooner than the August 6th date.

Regards,
Emma Howard

Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
<http://planning.lacounty.gov/sea>
Telephone: 213-974-6476

From: Hubsch, Allen W. [mailto:allen.hubsch@hoganlovells.com]
Sent: Wednesday, June 18, 2014 2:34 PM
To: Emma Howard
Subject: RE: SEA Ordinance Draft 5

Emma,

Will a decision regarding my parcel be reflected in the next public draft of the SEA documents? I have previously offered to meet with you to discuss, or to provide additional information. I remain available to do so.

Allen

Allen Hubsch

Hogan Lovells US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067

Tel: +1 310 785 4600
Direct: +1 310 785 4741
Fax: +1 866 266 3155
Email: allen.hubsch@hoganlovells.com
www.hoganlovells.com

Please consider the environment before printing this e-mail.

From: Emma Howard [mailto:ehoward@planning.lacounty.gov]
Sent: Monday, June 16, 2014 4:40 PM
To: Hubsch, Allen W.
Subject: RE: SEA Ordinance Draft 5

Allen, I apologize. I thought I'd sent a response. We will be continuing our hearing at the Regional Planning Commission which was scheduled on June 25th to August 6th. We'll contact you when we have made a decision and have a public release.

Regards,
Emma Howard

From: Hubsch, Allen W. [mailto:allen.hubsch@hoganlovells.com]
Sent: Friday, June 13, 2014 12:12 PM
To: Emma Howard
Subject: RE: SEA Ordinance Draft 5

Emma,

I am following up on my e-mails below. I have not received a response of any kind. Please advise.

Please include this e-mail thread in your staff report for the next hearing, as well as my original comment letter, which I have attached again. Thank you.

Allen

Allen Hubsch

Hogan Lovells US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067

Tel: +1 310 785 4600
Direct: +1 310 785 4741
Fax: +1 866 266 3155
Email: allen.hubsch@hoganlovells.com
www.hoganlovells.com

Please consider the environment before printing this e-mail.

From: Allen Hubsch [mailto:ahubsch@msn.com]
Sent: Monday, May 05, 2014 10:44 AM
To: Emma Howard
Subject: RE: SEA Ordinance Draft 5

Emma,

Hello. I'm following up on the e-mails below. Is there an update regarding the parcel in question?

Allen

From: ahubsch@msn.com
To: ehoward@planning.lacounty.gov
Subject: RE: SEA Ordinance Draft 5
Date: Wed, 23 Apr 2014 12:01:52 -0700

Emma,

Thank you for your e-mail below. I understand that the hearing on the SEA Program has been continued by the RPC. I would appreciate an update regarding the timing of a determination for the parcel in question.

Thanks very much.

Allen Hubsch

From: ehoward@planning.lacounty.gov
To: ahubsch@msn.com
Subject: RE: SEA Ordinance Draft 5
Date: Wed, 16 Apr 2014 19:42:56 +0000

Mr. Hubsch,

We have received your comments and will be submitting them to the Regional Planning Commission in a supplemental package to go out tomorrow. Your boundary requests have been added to our list and will be tracked. We will let you know when a decision is made and what decision we made. I may follow up with a request for more information as we work on determining. All determinations for your parcel will be made after the April 23rd hearing.

Regards,
Emma

Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
<http://planning.lacounty.gov/seq>
Telephone: 213-974-6476

From: Allen Hubsch [<mailto:ahubsch@msn.com>]
Sent: Friday, April 11, 2014 3:35 PM
To: Emma Howard
Subject: SEA Ordinance Draft 5

Dear Ms. Howard,

Attached are comments. If you are able to provide a response before the hearing, I would appreciate it. Thank you.

Allen Hubsch
213-712-2357

About Hogan Lovells

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From: [Emma Howard](#)
To: ["Allen Hubsch"](#)
Subject: RE: SEA Ordinance Draft 5
Date: Monday, May 05, 2014 10:50:23 AM

Allen,

Not yet. We should be in a touch in a week or two.

Thank you,
Emma

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Allen Hubsch

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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.

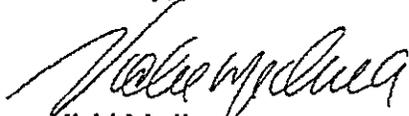
To illustrate the financial impacts associated with hauling aggregate materials longer distances, AVBOT notes that the State of California estimates the price of aggregate increases about 15 cents per ton for every mile that it is hauled, and to construct one mile of six-lane interstate highway requires 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



June 19, 2014

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RE: Los Angeles County proposed Hillside Management Area and Significant Ecological Areas Ordinances

The Antelope Valley Board of Trade, a non-profit business advocacy organization, in conjunction with BizFed, requests that you postpone any action on proposed Hillside Management Area (HMA) and Significant Ecological Area (SEA) ordinances until the completion of both the Fiscal Impact Analysis of and the Environmental Impact Report (EIR) Review of the LA County General Plan Update.

The County must consider the fiscal and economic impacts of these ordinances, taken together with the other implementing ordinances of the General Plan. The economic benefits new residential units provide, including quality jobs, government revenue, and economic stimulus is vital to our continued economic recovery. The construction of homes is one of the largest sources of good paying new jobs that do not require post-high-school education. On average, three-fifths of a household's income is spent in the local economy. It is our hope that the fiscal impacts analysis of the proposed LA County General Plan Update (which we understand should be complete by June 25) will make many of these benefits clear.

Additionally, in reviewing the current proposed HMA and SEA ordinances, we have identified flaws that pose potentially serious threats to the region's ability to address its expansion and housing needs in the future.

We are concerned with the dramatic expansion of the SEA land area from the current 245,000 acres to over 645,000 acres. This additional inclusion of over 400,000 acres is the equivalent of removing 1,000 square miles of land from consideration for future development. This development could be homes, schools and parks, industrial or commercial uses.

The HMA guidelines are restrictive and will dramatically reduce the amount of available land for development, in addition to reducing the land yield on nearly every existing and proposed project. The proposed guidelines would mean that 40 percent of unincorporated land would not be available for future development to meet our housing and community's needs, and fuel our economic recovery.

The Antelope Valley Board of Trade strongly urges the Regional Planning Commission and the County Board of Supervisors to postpone approval of the current draft ordinances and work with stakeholders to develop processes that work. This means creating ordinances that protect our environment while promoting a development plan that adequately addresses the needs of the Antelope Valley now and in the future. But this can only be properly accomplished after all stakeholders have the benefit of both the Fiscal Impacts Analysis of and the complete CEQA review.

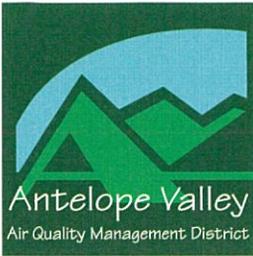
For over fifty-seven years the mission of the Antelope Valley Board of Trade has been "*to promote diverse business and industry, quality infrastructures, and a strong legislative voice for the benefit of our members and the greater Antelope Valley.*"

We look forward to working together to ensure development policies that meet the full scope of the Antelope Valley's needs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vick Medina", written over a horizontal line.

Vick Medina
Executive Director



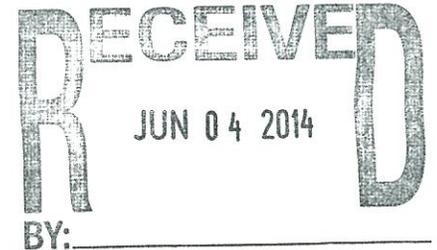
Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

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.

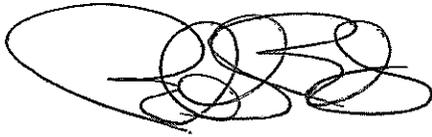
Caltrans has performed analysis that demonstrates the benefits of using local material supplies. Based on Caltrans' analysis, if material haul trips can be reduced on average by 15 miles, then:

- 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



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Website: www.avhcc.org Email: administrator@avhcc.org

Ms. Emma Howard

6/12/14

Los Angeles County, Department of Regional Planning

320 W. Temple Street, Room 1354, Los Angeles, CA 90012

RE: Changes to Significant Ecological Areas in the Antelope Valley Plan

Dear Ms. Howard,

The Antelope Valley Hispanic Chamber of Commerce is opposed to the increases in the Significant Ecological Areas (SEAs) for the Antelope Valley Plan.

The planned changes will have overwhelming negative impact for the Antelope Valley and other areas. The negative impact can be easily predicted in economic and ecological terms. The negative impact is such that there can be no justified reasons for increasing the SEAs.

Economic impact can be easily seen in several aspects: area controlled from the growing aerospace community, growth limited by forcing import of raw aggregate, loss of jobs in the region, and sustainable energy sources limited in growth. By creating boundaries that prevent the unimpeded natural growth of aerospace industries and renewable energies, we would expect California to see the emerging space industry to continue its shift to Texas. This would be a technological loss that will have a trickle-down effect that will be felt even to the lowest paid, who are traditionally the Hispanics.

Aggregate is used in all aspects of construction yet it will be imported from non-ecologically mindful countries. By adding another layer of the plan with larger SEAs, aggregate is being planned as sourced from foreign countries that are not governed by items such as the 1971 Surface Mining and Reclamation Act. This would cause a negative impact that is greater than worst case scenarios for the local aggregate mining. Since the Antelope Valley Hispanic Chamber of Commerce supports all Hispanics, we must try to stop the irreversible ecological damage done to the countries from which they immigrate, especially since the mines here are restored after end of use and provide good jobs. Ecological disasters arising from larger SEAs aside, the import of Mexican aggregate could further aggravate the plight of Mexican citizens held hostage to violent gangs. The New York Times covered this earlier this year with the story "Mexico targets gang that infiltrated the mining industry."

As a world leader, we cannot conscientiously designate SEAs with disregard to all humanity. The larger SEAs would also have a significant negative economic impact as well.

Sincerely,

Isaac G.D. Barcelona, President



Southern California
Los Angeles and Ventura
Counties Chapter

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Norm Witt, Cook Hill Properties

June 23, 2014

Honorable Chair Valadez, Chair
Regional Planning Commission
Los Angeles County
300 West Temple Street Rm 1350
Los Angeles, CA 90012

Re: Proposed Significant Ecological Area Ordinance Comments

Dear Honorable Chair Valadez:

The Los Angeles-Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIA) is the voice of residential building and development in Los Angeles and Ventura counties. We represent the thousands of men and women and their member companies who design, plan, build, and remodel homes, condominiums and apartments throughout our region.

As an association of industry professionals, technicians and skilled craftsmen we have deep knowledge and expertise in residential building and development. As such, we support safe, healthy, sustainable and quality rental and ownership housing, and measures that assure an adequate supply and range of housing types, sizes and costs that support a variety of lifestyle choices.

The facts, opinions and information contained herein are the result of a coordinated effort from an esteemed group of industry leaders who have genuine concern for the future of residential building and development in Los Angeles County. This group of industry leaders, part of the BIA's governmental affairs committee, are the "best of the best" when it comes to thoughtful and responsible use of the County's land resources to create thriving and sustainable communities.

The BIA government affairs committee and its builder members have monitored the development of the County's general plan update and provided comments on 4 separate drafts of the Significant Ecological Area (SEA) ordinance previously. Despite all of the BIA's efforts, we find serious flaws in the policies being developed, and that our biggest concerns are not being addressed.

As proposed, the new general plan, coupled with the proposed SEA and the HMA Ordinances will, when operating together, severely restrict if not outright eliminate the opportunity for development of subdivisions in Los Angeles County. Underlying the proposed new general plan and proposed implementing ordinances are preservation policies that unreasonably and unnecessarily complicate CEQA procedures, adding requirements far too burdensome and duplicative, which are not supported by proper study and evaluation.

The development of housing has been severely reduced in the county due to the economic downturn experienced during the last 7 years. Yet County staff is creating policies that will severely exacerbate an already difficult situation. Staff has failed to review and analyze the impacts that these policies will have on the declining investment and permitting patterns in the region. Despite BIA requests, and requests made by other business groups, staff has failed to produce an economic impact analysis of the proposed policies. County land use policies are already stifling the diversity of housing options and these proposed policies would severely restrict, if not completely eliminate the diversity of housing options. Moreover, the community has yet to receive a CEQA analysis of the combined effects of the new general plan and the implementing ordinances. BIA respectfully requests no approvals be considered, nor provided until a full vetting of the fiscal impacts and the CEQA analysis has been completed.

Furthermore, Los Angeles County has over a dozen approved Area Plans as well as one currently in the approval process. It is counter-productive to approve the SEA ordinance when they are in direct conflict with an approved Area Plan's regulations (e.g. One Valley One Vision in the Santa Clarita Valley) and mitigation requirements. Area Plans are designed to allow the local residents the ability to shape the area in which they live; specifically protecting the sensitive areas and outlining permitted development, specific to that region's unique topography. A countywide ordinance included in the General Plan, written by County staff, is too far reaching in nature and BIA requests that preservation, mitigation and restrictions be governed by each Area Plan, which are vetted by the local community.

Update of the SEA Ordinance is Not Necessary

The BIA has yet to receive a complete explanation of the need: 1) to update the SEA Ordinance, 2) to dramatically expand the SEA areas, 3) to increase the restrictions in the SEA areas, and 4) for the duplicative and complicated requirements and procedures imposed by the County to obtain the entitlements to develop in or around SEAs. Certainly the need is not driven by encroaching development, as is clearly demonstrated by reviewing the newly-released developed sites map within the proposed expanded SEA areas. That map shows that development in the proposed SEA areas is very, very sparse, and more importantly, that most development is of an older vintage built prior to today's regulations. Comparing the developed areas map with the SEA expansion maps, there is no appreciable evidence of *any* significant recent development patterns that are threatening the County's proposed new SEAs that could justify the dramatic expansion of the SEA

areas. The proposed revised SEA Ordinance, coupled with the dramatic SEA expansion, is simply not necessary to protect the proposed new SEAs from purported encroaching development. The fact that there are no significant development patterns affecting existing SEAs or the proposed expansion areas clearly demonstrates that existing general plans, zoning, policies, fish and wildlife regulation, clean water regulation, state and federal laws and CEQA are sufficiently adequate to protect our most valued environmentally sensitive areas. The SEA Ordinance and the SEATAC process are duplicative, complicated and staff has failed to analyze the effectiveness of existing regulation. Additionally, the SEA development standards are not consistent with mitigation practices imposed by other resource agencies.

Despite the BIA's repeated requests, staff has failed to produce a meaningful flow chart to show how the proposed SEATAC process coordinates with the CEQA process and subdivision approval process. The proposed SEATAC process should be used as an expanded scoping process to identify critical habitat and resources to be studied in an environmental impact report. After the scoping and during the preparation of an EIR the SEATAC process should end, yet the process provides no definitive end to coordinate with the CEQA or subdivision approval process.

In the unnecessary rush to revise the SEA maps and scope of the SEAs, staff has failed to evaluate other feasible alternatives from a CEQA or legal perspective. We suggest that a Multi-Species Habitat Conservation Plan (MSHCP) is more effective. Such programs typically include mitigation programs and mitigation banking to provide pathways for projects to proceed, and provide funding mechanism to compensate for the regulatory taking of private property. MSHCPs have been implemented in San Diego and Riverside Counties, yet no consideration of such an alternative has been considered in Los Angeles County. A comprehensive MSHCP would better analyze, prioritize and delineate program goals, sensitive biological resources and linkages, than the incomplete, cobbled-together and disjointed science which the County is using to justify the dramatic expansion of the SEAs. The failure to consider a MSHCP process is a failure to analyze project alternatives as required under CEQA.

The BIA reaffirms its concerns outlined in the letter to Emma Howard dated February 3, 2014 (Exhibit 1, attached). Few of these concerns were adequately addressed despite the BIA's repeated efforts to craft a balanced, responsible and workable ordinance, and SEA CUP process.

In summary, the proposed SEA Ordinance is moving forward with no proven threat to justify the expansion of SEA territory, or consideration of feasible alternatives. The future economic impacts of the proposed implementing ordinances, when taken together with the proposed new general plan, are substantial and have not been fully studied. The CEQA analysis must be presented and alternatives proposed. The combination of the new general plan, the dramatic and unnecessary proposed expansion of the SEAs, and the policies embodied by the proposed ordinances, will create a de facto building moratorium in large areas of the county, destroying the viability of

projects the County needs, in order to meet the range of housing required for its residents. The BIA requests the SEA ordinance be put on hold until studies are completed and detailed work for these ordinances can be completed for each Area Plan; to align the regulations within the individual plans crafted by the community and approved by the Board of Supervisors.

Sincerely,



Tim Piasky
Chief Executive Officer

Exhibit 1: BIA SEA Comment Letter dated February 3, 2014

Cc: Planning Commission
Board of Supervisors
Richard Bruckner, Director, Department of Regional Planning

Exhibit 1



Southern California
Los Angeles and Ventura
Counties Chapter

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BIA/LAV President

Greg Medeiros, Centennial Founders
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John Musella, The Musella Group

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Henrik Nazarian, Hall & Foreman Inc.

Randy Patterson, SARES-REGIS Group

Ben Rocca, Richmond American Homes

Sara Soudani, Lawyers Title

Rich Villaseñor, KB Home

Norm Witt, Cook Hill Properties

February 3, 2014

Emma Howard

ehoward@planning.lacounty.gov

LA County Department of Regional Planning
320 W Temple Street Room 1354
Los Angeles, CA 90012

**Re: Comments Draft 4 of the Significant Ecological Area (SEA) Ordinance
released on December 5, 2013**

Dear Emma,

The Building Industry Association of Southern California, Inc., Los Angeles/Ventura Counties Chapter (BIA) is a regional trade association that represents more than 1,000 member companies and their respective employees involved in building new homes in Southern California. On behalf of our membership, we are submitting comments on Draft 4 of the Significant Ecological Area (SEA) Ordinance, which was released on December 5, 2013.

The BIA serves as the collective voice of the home building industry. In this instance, the facts, opinions and information contained herein are the result of a coordinated effort of an esteemed group of industry leaders who have genuine concern for the future of homebuilding in Los Angeles County. This group of industry leaders, part of the BIA's governmental affairs committee, are the "best of the best" when it comes to thoughtful and responsible use of the County's land resources to create thriving and sustainable communities.

The BIA acknowledges the improvement in the latest draft ordinance, particularly with respect to the definitions, and applicability. To our disappointment, however, many of the BIA's prior concerns, outlined below, have largely not been considered, and there has not been significant movement on some of the key adverse components of the SEA Ordinance. We remain deeply concerned about the overreach of the ordinance, and the lengthy, complex, burdensome and duplicative process that project applicants will endure under the procedures outlined in the SEA Ordinance and the SEA Program Guide, which are in addition to the requirements under CEQA. Furthermore, thorough review has been difficult, due to incomplete materials. For example, both the Connectivity and Constraints Area Map and the Disturbed Area Map are not available, making a comprehensive review of the ordinance impossible. The BIA governmental affairs committee would like a working group meeting with

County staff to address the SEA Ordinance, the SEA process and the SEA Program Guide.

Fundamentally there are still many vague and conceptual issues that need to be properly clarified and vetted prior to public review of final draft ordinance. For example:

- Terms are defined, but not used consistently or rigorously within the Ordinance. For example Section 2905 defines "Development" in a way that is virtually synonymous with "disturbance". On page 5, 2905.E defines "Developed Area" as "areas that have been developed" (note: small "d" developed – not a defined term). Thus, it is not clear whether a Developed Area is one that has undergone "Development" (i.e. previously been disturbed), or something else.
- Similarly, 2905.E excludes "those (areas) that have been developed for agricultural purposes", which may or may not mean an "Agricultural Developed Area" defined in 2905.D. This occurs throughout the draft, as the provisions haphazardly use or avoid using defined terms.
- We also have circular definitions in which one of the passages defining Development {2905.C.6 on page 5} refers back to "development as defined herein".
- Also, definition 2905.S on page 7 in which Water Resources is defined in part as "the types of surface water protected by this part 28".
- In terms of overreach, the draft contains the breathtakingly broad statement that the term Development includes "Off-site activities that occur... as a result of development" (2905.C.6 on page 5). By that definition, SEA regulation might extend to include the lumber yard that provides building materials.
- Similarly, the Applicability of Use Restrictions (2910.A) removes all doubt as to whether a landowner retains any vestige of control over his property with the strikingly broad statement that "A person shall use any... land wholly or partially located within an SEA only as specifically permitted by this Part 28."
- Existing and historic uses are not necessarily grandfathered. The definitions for Habitat Preservation Area and Natural Open Space (2905 H & I) operate to ensure that acreage used for habitat restoration falls into the "Development" category, which will increase the acreage forfeitures in section 2940.
- Add in Item 2905.C.6, and offsite habitat restoration anywhere in the County becomes SEA Development.

We could go into great depth on numerous other concerns, given the complexity of these issues, we will defer that detail until we have an opportunity to meet in person. However, we would like to continue to provide a brief summary of the BIA's primary concerns.

Primary Concerns

For Development Projects, the SEA Program disjointedly overlays CEQA and other state and federal regulations, and severely restricts and removes the Supervisors' contextual land-use discretion and authority.

- Development projects are subject to CEQA, pursuant to which project impacts on species, habitats and corridors are evaluated. CEQA allows for mitigation, mitigation banking, etc. to be implemented, thus providing a pathway for a project to proceed, despite its impacts.
- The proposed Ordinance requires in certain instances the preparation of reports that mirror the reports that must be prepared under CEQA for EIRs and, in some instances, for MNDs and NDs. Rather than requiring the unnecessary duplication of cost, effort and time, the proposed Ordinance should provide that documents prepared under CEQA be submitted for use under the Ordinance.
- State and Federal agencies establish scientific criteria for protecting threatened and endangered species and habitats. There is no need for the County to use its limited resources to enact sweeping and duplicative regulations. Why is it necessary for the staff biologist to measure the depth of a river or large lake, and how will this be done?
- The role of the staff biologist has expanded far beyond its expertise, and staff biologist duties, as outlined in the SEA ordinance, exceed the County's staff resources. This will cause unnecessary delay to projects in the SEATAC process.
- The SEATAC procedures manual (page 5) provides that "if the proposed mitigation strategy will not fully mitigate the impact, then that impact should be declared unavoidable and significant." This is inconsistent with CEQA, which allows for an impact determination of "less than significant" even when the impact is not fully mitigated.
- County staff should provide a flow chart of how the SEATAC process integrates with subdivision processing and the CEQA process. Despite the CEQA process, and the County's intimate involvement in that process, a project applicant may endure multiple rounds with SEATAC until a staff report is finally settled upon for public hearing.
- SEATAC's final "Ruling of Compatibility" is inconsistent with the CEQA process, thus insuring a duplicative, burdensome and potentially circular environmental review process. Applicants are encumbered with multiple SEATAC meetings to address endless requests for information, causing lengthy delays.
- Multiple duplicative reports are required to comply with both the SEATAC Program and to obtain CEQA clearance for a project.
- The proposed SEA Ordinance uses the County's land use authority to stop virtually all development on or near land designated as an SEA, because it presumes that preservation (not mitigation) is the only allowable and appropriate strategy to address environmental impacts. This approach is contrary to law.
- Projects will be denied at the staff level. The result is a de facto development moratorium that takes away discretion from the Board of Supervisors to make land use decisions in the County.
- The findings, as currently proposed, allow staff and SEATAC to reject a project if they are not satisfied, usurping and preempting the discretionary authority of the Board of Supervisors.

- The SEA ordinance should recognize areas already identified as suitable for conservation and development and should provide that 1) SEA boundaries align with the existing conservation plans and, 2) the existing conservation plans be recognized as suitable mitigation. Examples of this are the Desert Renewable Energy Conservation Plan and the Tejon Ranch Conservation and Land Use Agreement.

Once land is designated as being in an SEA, there is no mechanism to remove the SEA designation without a General Plan Amendment.

- The process assumes that a landowner is “guilty until proven innocent” and it is virtually impossible to be found innocent. Once land is designated as being in SEA (whether this designation is accurate or not), the landowner may not be able to develop at all.
- Once land is designated as being in an SEA, there is no swift way to avoid the SEA process even where the facts plainly warrant such avoidance. As the ordinance is currently proposed, even if and where it is relatively easily shown that there actually is no unique resource requiring protection, the landowner still must obtain a CUP and may also need to obtain a General Plan Amendment to modify the SEA boundary.

The SEATAC committee membership requires balance and fairness.

- The SEATAC process is not balanced and lacks a thoughtful membership structure. The committee is made up of disproportionately conservation-minded individuals; and – unless a fairer balance is assured – it will lack perspective from the development industry and expertise associated with diverse protection and mitigation strategies. At a minimum, to provide diversity, the SEATAC board should include seats reserved for development expert categories including biologists, engineers, land planners, developers and biologists endorsed by developers who regularly represent developers in seeking project approvals. The SEATAC Board should reflect a solutions-based diversity of perspectives. The SEATAC board must not be an “exclusive club for the benefit of its members” which is dominated by conservation-minded environmental experts. The selection process does not insure that won’t happen.
- Members of SEATAC have limited requirements to disclose conflicts of interest; and there is insufficient vetting and diversity of its membership. The integrity of SEATAC must be questioned when reports prepared by qualified biologists and submitted by project applicants are rejected without explanation.

The proposed expansion of SEAs is unfounded

- The proposed five-fold expansion (from 125,000 to 645,000 acres) characterizes nearly one-third of the unincorporated land as containing “unique and special” resources. The 487,000-acre expansion – or 760 square miles – includes nearly one-third of the unincorporated County.

- The expansion is based on limited data, information and reports cobbled together, which taken together constitute insufficient grounds on which to impose the substantive and procedural burdens that are proposed.
- A cohesive and comprehensive study and survey of the all the SEA areas was not done in a consistent and uniform manner. In 1999, the Board of Supervisors authorized only \$275,000 to fund studies of the SEAs. This was supplemented by aerial and map-based reviews, and ratified through a mere 1-day "review" by biologists. The panel only expanded SEA designations; nothing was removed, even though the designations presented were plainly overly-inclusive. There clearly has not been enough data compiled in a comprehensive and consistent scope of study to justify a five-fold expansion of the SEA boundary.
- The latest drafts now include "ecological transition areas" and "connectivity areas" which further expand the land subject to the SEA ordinance.

Further editing of the proposed SEA Ordinance is required to render it consistent with other requirements and ordinances, and legally enforceable.

- The proposed SEA Ordinance remains inconsistent with other requirements. For example, there is no rational basis for prohibiting barbed wire fencing in an SEA area where livestock are kept or allowed to graze. As another example, brush clearance is prohibited without compliance with this proposed Ordinance, despite Fire Department requirements.
- Certain of the proposed Ordinance's definitions are circular (e.g., "Developed Area"), and certain terms are undefined still (e.g., "Revised Exhibit A" and "Revised Site Plan").
- Documents referred to in and/or relied upon by the proposed Ordinance are still not available for public review (e.g., "SEA Connectivity and Constriction Areas Map"). Without the information contained in these documents, the full import of the proposed Ordinance cannot be reviewed and commented upon by the public.

We respectfully urge the County to revisit its entire approach to revising the SEA program. The proposed Ordinance must respect and integrate other regulatory and CEQA processes and have mechanisms for balancing impacts, implementing mitigations, rather than harshly providing avenues to deny projects or overburden them to the extent that development is essentially prohibited. We therefore ask that the County establish processes with sufficient flexibility to accommodate the diversity of the unincorporated County land. It's time to revisit the need to amend the SEA Ordinance and ask why the County is compelled to amend the ordinance. What are the goals? How can the process be made equitable, more efficient, less duplicative and less cumbersome when combined with other regulatory processes? It seems the process of amending the SEA Ordinance has grown into a larger monster of a CEQA-type process before an unbalanced decision-making body, outside of and not coordinated with the CEQA process.

The County must provide for future housing and economic development. The sweeping land-use proposals currently being contemplated by the County's staff will, taken together and if adopted, constitute a functional building prohibition in many areas of the unincorporated County. When one

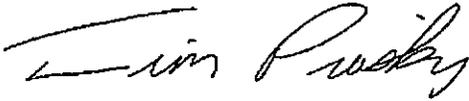
Emma Watson
February 3, 2014
Page 6

adds together the proposed downzoning being considered in connection with the new general plan and the new restrictions and requirements proposed in the drafts of the SEA Ordinance and the Hillside Management Ordinance, the County is aiming toward severely restricting development outside the current urban boundary – virtually creating a prohibition on greenfield development. Greenfield development, when undertaken sensibly, provides a necessary opportunity to supply single-family, detached housing, which remains the #1 consumer-demanded form of homeownership.

The County needs to accommodate foreseeable growth in population, with the alternative to a reasonable mix that includes some Greenfield development being only the so-called “stack and pack” land planning that solely increases the density and intensity of land uses within in the urban boundary. The currently-proposed fundamental shifts in land planning will have unintended consequences, which must be studied and mitigated through a balanced and well-rounded approach to housing growth. We ask the County to reconsider its current path and work to modernize the SEA program by finding an appropriate balance between conservation and growth.

We welcome a dialog to further the discussion on this very important issue; and we hope to have an opportunity to meet with County planning staff in a working group meeting similar to the recent meeting on the Hillside Management Ordinance.

Sincerely,



Tim Piasky
Chief Executive Officer

C: Richard Bruckner, Director of Regional Planning

Strengthening the Voice of Business

Chambers of Commerce

- Alhambra
- Arcadia
- Armenian American
- Bell Gardens
- Beverly Hills
- Burbank
- Century City
- Claremont
- Culver City
- El Monte
- Filipino American Los Angeles
- Filipino American South East Corridor
- Glendale
- Greater Lakewood
- Greater Los Angeles African American
- Harbor City / Harbor Gateway
- Hollywood
- Irwindale
- Korean American
- LAX Coastal Area
- La Canada Flintridge
- Long Beach Area
- Los Angeles Area
- Los Angeles Latino
- Los Angeles Metropolitan Hispanic
- Malibu
- Manhattan Beach
- Montebello
- Pacific Palisades
- Pasadena
- Pomona
- Redondo Beach
- Regional Black
- Regional Hispanic
- Regional San Gabriel Valley
- Rosemead
- San Pedro Peninsula
- Santa Clarita Valley
- Santa Monica
- South Bay Association
- Toluca Lake
- Torrance Area
- United Chambers San Fernando Valley
- Universal City North Hollywood
- Vernon
- Vietnamese American
- West Hollywood
- West Los Angeles
- Westside Council
- Wilmington
- Woodland Hills-Tarzana
- Trade Associations and Minority Business Groups**
- AIA Los Angeles
- American Beverage Association
- Antelope Valley Board of Trade
- Apartment Association, CA Southern Cities
- Apartment Association of Greater Los Angeles
- Arcadia Association of Realtors
- Asian American Business Women Association
- Asian Business Association
- Associated Builders and Contractors - LA/Ventura
- Beverly Hills / Greater LA Association of Realtors
- British American Business Council
- Building Industry Association, LA / Ventura
- Building Owners & Managers Association, LA
- Burbank Association of Realtors
- California Apartment Association, LA
- California Cannabis Industry Association
- California Contract Cities Association
- California Grocers Association
- California Independent Bankers
- California Independent Petroleum Association
- California Metals Coalition
- California Small Business Alliance
- Carson Dominguez Employers Alliance
- Central City Association
- Citrus Valley Association of Realtors
- Construction Industry Air & Water Quality Coalitions
- Council on Trade & Investment for Filipino Americans
- Employers Group
- Entrepreneurs' Organization LA
- Fixing Angelenos Stuck In Traffic (FAST)
- FuturePorts
- Gateway to LA
- Glendale Association of Realtors
- Greater Asian Business Federation
- Greater LA New Car Dealers Association
- Harbor Association of Industry & Commerce
- Harbor Trucking Association
- Hospital Association of Southern California
- Hotel Association of Los Angeles
- Industry Manufacturers Council
- International Warehouse Logistics Association
- LA SHARES
- League of California Cities
- Los Angeles County Economic Development Corp.
- Los Angeles County Waste Management Association
- Motion Picture Association of America
- NAIOP Southern California
- National Association of Women Business Owners, LA
- National Latina Business Women Association
- Pasadena-Foothills Association of Realtors
- Recording Industry Association of America
- San Gabriel Valley Economic Partnership
- Santa Clarita Valley Economic Development Corp.
- So Cal Minority Supplier Development Council
- South Asian Business Alliance Network
- South Bay Association of Realtors
- South Park Stakeholders Group
- Southern California Grantmakers
- Southland Regional Association of Realtors
- Tri-Counties Association of Realtors
- Valley Economic Alliance
- Valley Economic Development Center
- Valley Industry Association of Santa Clarita
- Valley Industry & Commerce Association
- Valley International Trade Association
- We Care for Humanity
- Western Manufactured Housing Association
- Western States Petroleum Association

June 18, 2014

COUNTY OF LOS ANGELES PLANNING COMMISSION

Esther L. Valadez
 Laura Shell
 David W. Louie
 Curt Petersen
 Pat Modungo
 200 W. Temple St., 13th floor
 Los Angeles, CA 90012

RE: Los Angeles County proposed Hillside Management Area and Significant Ecological Areas Ordinances

On behalf of BizFed, the Los Angeles County Business Federation, a grassroots alliance comprised of more than 120 top business organizations representing 268,000 employers with 3 million employees throughout LA County, we are writing to request that you postpone any action on proposed Hillside Management Area (HMA) and Significant Ecological Area (SEA) ordinances until the completion of both the Fiscal Impacts Analysis of and the Environmental Impact Report (EIR) Review of the LA County General Plan Update.

The County must consider the fiscal and economic impacts of these ordinances, taken together with the other implementing ordinances of the General Plan. The economic benefits new residential units provide, including quality jobs, government revenue, and economic stimulus is vital to our continued economic recovery. The construction of homes is one of the largest sources of good paying new jobs that do not require post-high-school education. On average, three-fifths of a household's income is spent in the local economy. It is our hope that the fiscal impacts analysis of the proposed LA County General Plan Update (which we understand is undergoing internal staff review and should be released in the near future) will make many of these benefits clear.

Additionally, in reviewing the current proposed HMA and SEA ordinances, we have identified flaws that pose potentially serious threats to the region's ability to address its expansion and housing needs in the future.

We are concerned with the dramatic expansion of the SEA land area from the current 245,000 acres to over 645,000 acres. This additional inclusion of over 400,000 acres is the equivalent of removing 1,000 square miles of land from consideration for future development. This development could be homes, schools and parks, industrial or commercial uses.

The HMA guidelines are restrictive and will dramatically reduce the amount of available land for development, in addition to reducing the land yield on nearly every existing and proposed project. The proposed guidelines would mean that 40 percent of unincorporated land would not be available for future development to meet our housing and community's needs, and fuel our economic recovery.

On behalf of BizFed, we urge the Regional Planning Commission and the County Board of Supervisors to reject the current draft ordinances and work

with stakeholders to develop processes that work. This means creating ordinances that protect our environment while promoting a development plan that adequately addresses the needs of the region now and in the future. But this can only be properly accomplished after all stakeholders have the benefit of both the Fiscal Impacts Analysis of and complete CEQA review.

We look forward to continue working together to ensure balanced development policies that meet the full scope of our region's needs.

Sincerely,



Don St. Clair
BizFed Chair
Woodbury University



David Fleming
BizFed Founding Chair
Latham & Watkins LLP



Tracy Rafter
BizFed Founding CEO
IMPOWER, Inc.

CC: Los Angeles County Board of Supervisors

From: WilliRat@aol.com
To: [Mitch Glaser](#); [Emma Howard](#)
Subject: Temescal Ranch
Date: Wednesday, May 07, 2014 3:29:19 PM

I wanted to thank you for the opportunity to sit down last week and discuss the various draft ordinances, guidelines, and designations working their collective way through the public hearing process in anticipation of the approval later this year.

Following our meeting, and at your urging I reviewed the 2013 Draft Hillside Management Ordinance, the Draft Hillside Design Guidelines, as well as the maps for the proposed SEA to be known as the Santa Felicia SEA, and have some concerns specific to the Temescal Ranch for which I serve as the Referee in Partition:

- The Draft HMA has a 70% open space requirement which is now applicable to the entire property. For example if you owned 6000 acres, you would have to set aside 4200 acres for open space before you even submitted for the approval of a discretionary CUP to do something with the balance. Even to farm it, much less develop it. The current ordinance stipulates that only areas which have a slope of 25% or more are included in the definition of a HMA. The new proposed ordinance, provides for the fact that if any part of a property has a slope of 25% or more, all the property is now to be included in the definition, not only the actual property with the 25% slope. So in essence this represents an ordinance that is designed to take property from hillside owners who may have had property zoned for agriculture/grazing under all the preceding regulations for many decades.*
- Under the existing provisions, a CUP is only required if the area of development which is proposed to be developed with residential uses exceeds the midpoint range of the adopted plan.*
- Under the existing regulations, accessory buildings and appurtenant structures would not require a conditional use permit; under the proposed regulations a CUP would be required.*
- It seems that any concepts of Land Use and Zoning will be circumvented by what appears to be a "anti-development" Hillside Management Ordinance". The language proposed in the new ordinance further defines development in a number of ways including "the removal of any vegetation, including fuel modification". So if the Temescal Ranch hillsides can not be used for agriculture and grazing, then all it might be useful for is open space, which of course puts this proposed ordinance, and its' supporting documents and maps in direct opposition to Government Code Section 65912.*
- Additionally the revisions to the existing SEA map to now include the Temescal Ranch in a newly designated Santa Felicia SEA for which the requirements for "development of any type" must be submitted to a Type B CUP hearing with SEATAC.*
- Finally when I put all of these various layering of proposed ordinances together, and then combine the thrust behind them with the 2011 Santa Clarita Valley Area Plan which was approved on 11/27/12, it appears that a case could be made, taken in total, that these when utilized together may serve to constitute a taking of lands that are desired as "natural buffer areas surrounding the entire valley... which shall be preserved as a regional recreational, ecological, and aesthetic resource".*

With respect to grazing rights and the use of same on the Temescal Ranch amongst other properties, I would request to be kept in the loop as the language is developed with respect to these new proposed ordinances. Emma, I would also appreciate any contact information that you may be able to provide for; Peterson Ranch mitigation bank in the AV, as well as Thuy Hua's contact information regarding the proposed Renewable Energy Ordinance.

Can I also request to be placed on the list of interested parties for all future public hearings regarding these items at your convenience.

Thank you once again for your time last week.

Best

Bill Rattazzi



California Construction and Industrial Materials Association

July 17, 2014

Ms. Connie Chung
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: Comments Los Angeles General Plan – Redline Version June 23, 2014

Dear Ms. Chung,

The California Construction and Industrial Materials Association (CalcIMA) is a statewide trade association representing construction aggregate, ready-mix concrete and industrial materials producers in California. Our members supply the materials that build our state’s infrastructure, including public roads, rail and water projects; helps build our homes, schools and hospitals; assists in growing crops and feeding livestock; and plays a key role in manufacturing wallboard, roofing shingles, paint, glass, low-energy light bulbs, and battery technology for electric cars and windmills.

CalcIMA appreciates the opportunity to submit the following comments regarding the Los Angeles County General Plan 2035 – Redline Version June 23, 2014, and looks forward to working with the County in the prudent protection of mineral resources.

General Plan, Section VI. Mineral and Energy Resources Additions to Goals and Policies For Mineral and Energy Resources

Specifically in support of Goal C/NR 10, CalcIMA suggests the following additional policies to further strengthen the County’s General Plan Goals for mineral resources. The additions are noted in **bold** and are listed as policies C/NR 10.2 through C/NR 10.5. Policies C/NR 10.2 and C/NR 10.3 are obligations under state statute.

Goal C/NR 10: Locally available mineral resources to meet the needs of construction, transportation, and industry.	
Topic	Policy
Mineral Resource Zone Protection	Policy C/NR 10.1: Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses.

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Mineral Resource Zone Protection	Policy C/NR 10.2: prior to permitting a use that would threaten the potential to extract minerals in an identified Mineral Resource Zone, the county shall prepare a statement specifying its reasons for permitting the proposed use, and shall forward a copy to the State Geologist and the board for review in accordance with Public Resources Code subsections 2762 and 2763 as applicable.
Mineral Resource Zone Protection	Policy C/NR 10.3: Recognize newly identified MRZ-2s within 12 months of transmittal of information by State Mining and Geology Board.
Mineral Resource Zone Protection	Policy C/NR 10.4: Work with the State Geologist and State Mining and Geology Board and SCAG to prioritize Mineral Land Classification efforts of MRZ3 and MRZ 4 lands adjacent to planned new or existing Freight routes.
Mineral Resource Zone Protection	Policy C/NR 10.5: Work with SCAG to include mineral resource zones within the Natural Resources section of their Sustainable Communities Strategies as directed under SB 375.
Mineral Resources Zone Protection	Policy C/NR 10.6: Manage mineral resources in a manner, which effectively plans for the access to, development and conservation of mineral resources for existing and future generations.
Mineral Resources Zone Protection	Policy C/NR 10.7: Require that new non-mining land uses adjacent to existing mining operations be designed to provide a buffer between the new development and the mining operations. The buffer distance shall be based on an evaluation of noise, aesthetics, drainage, operating conditions biological resources, topography, lighting, traffic, operating hours and air quality.

General Plan Updates – 3. Data Updates

CalCIMA suggests that Mineral Resources be included in the Data Update section and that the following supporting language be included:

“Programs such as the state’s mineral land classification project are updated with new and expanded information over time. The county is required to recognize data transmitted by the State Mining and Geology Board within the General Plan within 12 months of receipt under Public Resources Code 2762 (a)1.”

Appendix C: Land Use Element Resources – Table C.1: Constraints, by Class and Data Sources.

Under Mineral Resources (pg. 156), the County states, “A continuous supply of aggregate materials for urban infrastructure is essential to the Southern California economy.” Recognizing the critical role of aggregates in fulfilling the County’s future infrastructure needs, CalCIMA strongly suggests that the County’s Mineral Resource Zones currently classified as Class I be

reclassified as Class II. State Statute 65080.01 presently states that Mineral Resource Zone 2 is equivalent to prime farm land that the County currently has classified as Class II.

Thank you for the opportunity to submit comments on latest iteration of the Los Angeles County General Plan 2035. We appreciate your consideration of our comments and look forward to a productive and open dialogue on the revisions to over the next few months. Should you have any questions, please do not hesitate to contact me at (562) 370-7129.

Sincerely,

A handwritten signature in black ink that reads "A. Driscoll". The signature is written in a cursive, flowing style.

Angela Driscoll
Director, Local Government Affairs



California Construction and
Industrial Materials Association

June 12, 2014

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

RE: Additional Comments Regarding Draft 5 of the Significant Ecological Areas

Dear Ms. Howard,

The California Construction and Industrial Materials Association (CalcIMA) is a statewide trade association representing construction aggregate, ready-mix concrete and industrial materials producers in California. Our members supply the materials that build our state's infrastructure, including public roads, rail and water projects.

As stated in our letter dated April 11, 2014, CalcIMA strongly opposes the proposed Significant Ecological Area (SEA) overlay, which would create a direct and detrimental conflict with current and future aggregate material availability in the region. Additionally, the SEA overlay in the Antelope Valley and Santa Clara River Valley areas will negatively impact the County's SB 375 goals since this specific area (E-1, E-2, E-3 E-4, and E-5) would overlap land that the State has long designated as an area of statewide mineral significance already CEQA approved. The proposed overlay would certainly deter mining companies from accessing significant aggregate deposits used for critical infrastructure projects countywide. Furthermore, the SEA overlay would force the County to become wholly dependent on aggregate sources from neighboring regions and/or neighboring counties. It would also trigger significant increases in costs to the County along with dramatic increases in carbon dioxide emissions, air pollution, traffic congestion, and highway maintenance requiring costly additional analysis as part of the County's SB 375 goals and the overall General Plan.

For the reasons above CalcIMA request that minerals extraction be exempt from the SEA Ordinance in order for the county to maintain a local source of aggregates and other construction materials.

Sincerely,

Angela Driscoll
Director, Local Government Affairs

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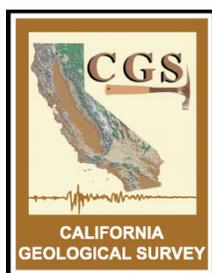
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MAP SHEET 52

(UPDATED 2012)

AGGREGATE SUSTAINABILITY IN CALIFORNIA

2012



CALIFORNIA GEOLOGICAL SURVEY
Department of Conservation

**THE NATURAL RESOURCES
AGENCY**
JOHN LAIRD
SECRETARY FOR RESOURCES

STATE OF CALIFORNIA
EDMUND G. BROWN, JR.
GOVERNOR

DEPARTMENT OF CONSERVATION
MARK NECHODOM
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CALIFORNIA GEOLOGICAL SURVEY
JOHN G. PARRISH, PH.D., *STATE GEOLOGIST*

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MAP SHEET 52

(UPDATED 2012)

**AGGREGATE SUSTAINABILITY
IN CALIFORNIA**

By

John P. Clinkenbeard (PG #4731)

2012

CALIFORNIA GEOLOGICAL SURVEY

DEPARTMENT OF CONSERVATION

801 K Street, MS 12-31

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INTRODUCTION

Sand, gravel, and crushed stone are “construction materials.” These commodities, collectively referred to as aggregate, provide the bulk and strength to Portland Cement Concrete (PCC), Asphaltic Concrete (AC, commonly called “black top”), plaster, and stucco. Aggregate is also used as road base, subbase, railroad ballast, and fill. Aggregate normally provides from 80 to 100 percent of the material volume in the above uses.

The building and paving industries consume large quantities of aggregate and future demand for this commodity is expected to increase throughout California. Aggregate materials are essential to modern society, both to maintain the existing infrastructure and to provide for new construction. Therefore, aggregate materials are a resource of great importance to the economy of any area. Because aggregate is a low unit-value, high bulk weight commodity, it must be obtained from nearby sources to minimize economic and environmental costs associated with transportation. If nearby sources do not exist, then transportation costs can quickly exceed the value of the aggregate. Transporting aggregate from distant sources results in increased construction costs, fuel consumption, greenhouse gas emissions, air pollution, traffic congestion, and road maintenance.

To give an idea of the scale of these impacts, from 1981 to 2010, California consumed an average of about 180 million tons of construction aggregate (all grades) per year. Moving in 25 ton truckloads that is over 7.2 million truck trips per year. With an average 25 mile haul (50 mile round trip) that amounts to more than 360 million truck miles traveled, almost 47 million gallons of diesel fuel used, and more than 520,000 tons of carbon dioxide emissions produced annually. If the haul distance is doubled to 50 miles (100 mile round trip) the numbers double to 721 million truck miles traveled, almost 94 million gallons of diesel fuel used, and over 1 million tons of carbon dioxide emissions produced.

Land-use planners and decision makers in California are faced with balancing a wide variety of needs. Increasingly, as existing permitted aggregate supplies are depleted, local land-use decisions regarding aggregate resources can have regional impacts that go beyond local jurisdictional boundaries.

These factors, universal need, increasing demand, the economic and environmental costs of transportation, and multiple land-use pressures make information about the availability and demand for aggregate valuable to land-use planners and decision makers charged with planning for a sustainable future for California’s citizens.

California Geological Survey (CGS) Map Sheet 52, 1:1,100,000-scale, and this accompanying report provide general information about the current availability of, and future demand for, California’s permitted aggregate reserves. Map Sheet 52 was originally published in 2002 (Kohler 2002) and subsequently updated in 2006 (Kohler 2006). Map Sheet 52 (2012) is an update of the version published in 2006.

Map Sheet 52 updates data from reports compiled by the CGS for 31 aggregate study areas throughout the state. These study areas cover about 30 percent of the state and provide aggregate for about 85 percent of California’s population. This report is divided into three parts: Part I provides data sources and methods used to derive the information presented; Part II compares the updated 2012 Map Sheet 52 to the prior (2006) map; and, Part III is an overview of construction

AGGREGATE SUSTAINABILITY IN CALIFORNIA — MAP SHEET 52 (UPDATED 2012)

aggregate. All aggregate data and any reference to “aggregate” in this report and on the map pertain to “construction aggregate,” defined for this report as alluvial sand and gravel or crushed stone that meets standard specifications for use in PCC or AC unless otherwise noted.

The estimates of permitted resources, aggregate demand, and years of permitted reserves remaining presented on Map Sheet 52 (2012) and in this report are based on conditions as of January 1, 2011 and do not reflect changes, such as production, mine closures, or new or expanded permits, that may have occurred since that time. Although the statewide and regional information presented on the map and in this report may be useful to decision-makers, it should not be used as a basis for local land-use decisions. The more detailed information on the location and estimated amounts of permitted and non-permitted resources, and future regional demands contained in each of the aggregate studies employed in the compilation of Map Sheet 52 should be used for local land-use and decision making purposes.

PART I: DESCRIPTION OF MAP SHEET 52, AGGREGATE SUSTAINABILITY IN CALIFORNIA

Map Sheet 52 is a statewide map showing a compilation of data about aggregate availability collected over a period of about 33 years and updated to January 1, 2011. The purpose of the map is to compare projected aggregate demand for the next 50 years with currently permitted aggregate reserves in 31 regions of the state. The map also shows the projected years of permitted reserves remaining and highlights regions where there is less than 10 years of permitted aggregate supply remaining. The following sections describe data sources and methodology that were used in the development of the map.

Mineral Land Classification Reports and Aggregate Studies

Data regarding aggregate reserves and projected aggregate demand shown on Map Sheet 52 are updated from a series of mineral land classification reports published by CGS between 1981 and 2010 (see Appendix). They were prepared in response to California's Surface Mining and Reclamation Act of 1975 (SMARA) that requires the State Geologist to classify land based on the known or inferred mineral resource potential of that land. SMARA, its regulations and guidelines, are described in Special Publication 51 (Division of Mines and Geology, 2000).

The Mineral Land Classification process identifies lands that contain economically significant mineral deposits. The primary goal of mineral land classification is to ensure that the mineral resource potential of lands is recognized and considered in land-use planning. The classification process includes an assessment of the quantity, quality, and extent of aggregate deposits in a study area.

Mineral land classification reports may be specific to aggregate resources, may contain information about both aggregate and other mineral resources, or they may only contain information on minerals other than aggregate. Reports that focus on aggregate include aggregate resource classification and mapping, estimates of permitted and non-permitted aggregate resources, projected 50-year demand for aggregate resources, and an estimate of when the permitted reserves will be depleted. Map Sheet 52 is a statewide updated summary of 50-year demands and permitted resource calculations for all SMARA classification reports pertaining to construction aggregate.

Mineral land classification studies for aggregate may use either a Production-Consumption (P-C) region or a County as the study area boundary. A P-C region is one or more aggregate production districts (a group of producing aggregate mines) and the market area they serve. P-C Regions sometimes cross county boundaries. Mineral land classification reports include information from one or more P-C regions, or from a county. For ease in discussion, the area covered by each P-C region or county aggregate study is referred to as an "aggregate study area". These areas are shown at the lower left-hand corner of the map along with their respective report number and publication date. It should be noted that a report may include more than one aggregate study area.

SMARA guidelines recommend that the State Geologist periodically review the mineral land classification in defined study regions to determine if new classifications are necessary. The projected 50-year forecast of aggregate demand in the region may also be revised. Fourteen

updated classification studies have been completed since the program began. Updated studies were completed by county:

- Los Angeles,
- Orange, and
- Ventura

or by P-C region

- South San Francisco Bay,
- Monterey Bay,
- Western San Diego County,
- Fresno, Palm Springs,
- Stockton-Lodi,
- Claremont-Upland,
- North San Francisco Bay (in progress) ,
- San Bernardino,
- San Gabriel Valley,
- Bakersfield, and
- San Luis Obispo-Santa Barbara.

Since Los Angeles and Ventura counties had more than one P-C region, separate updated 50-year forecasts were made for each region. The Los Angeles County update (OFR 94-14) includes the San Fernando Valley, San Gabriel Valley, Saugus-Newhall, and the Palmdale P-C regions. The San Gabriel Valley P-C Region has since been updated separately. The Ventura County update (OFR 93-10) included the Western Ventura and the Simi Valley P-C regions. The index map of aggregate studies shown in the lower left hand corner of Map Sheet 52 shows the latest reports that cover an aggregate study area. Earlier reports covering the same areas or portions of areas are referenced in the Appendix with an asterisk (“*”).

Fifty-Year Aggregate Demand Forecast

The fifty-year aggregate demand forecast for each of the aggregate study areas is presented on Map Sheet 52 as a pie chart (See *Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves* section), and also is presented in Table 1 of this report. The demand information may be new, or updated from previously published mineral land classification reports. The demand forecast information depicted on Map Sheet 52 is for the period January 1, 2011 through December 2060.

The aggregate study areas with the greatest projected future need for aggregate are South San Francisco Bay, Temescal Valley-Orange County, and Western San Diego County. Each is expected to require more than a billion tons of aggregate by the end of 2060. Other areas with projected high demands are San Gabriel Valley, and San Bernardino. Each of these areas is projected to need more than 800 million tons of aggregate in the next 50 years. Aggregate study areas having smaller demands generally are located in rural, less populated areas. The aggregate study areas of El Dorado County, Glenn County, Nevada County, Shasta County, Southern Tulare

County, Tehama County, and Western Merced County are all projected to require 100 million tons of aggregate or less over the next 50 years.

Methodology

Before selecting a method for predicting a 50-year aggregate demand, historical aggregate use was compared to such factors as housing starts, gross national product, population, and several other economic factors. It was found that the only factor showing a strong correlation to historical aggregate use was population change. Consequently, a per capita aggregate consumption forecast model is used for most of the aggregate study projections. This method of forecasting aggregate consumption benefits from its simplicity and the availability of population forecast data. The California's Department of Finance (DOF) makes 50-year county population forecasts using U.S. census data.

The steps used for forecasting California's 50-year aggregate needs using the per capita consumption model are: 1) collecting yearly historical production and population data for a period of years ranging from the 1960s through 2010; 2) dividing yearly aggregate production by the population for that same year to determine annual historical per capita consumption; 3) projecting yearly population for a 50-year period from the beginning of 2011 through 2060; and, 4) multiplying each year of projected population by the average historical per capita consumption and adding the results for each year to obtain the 50-year aggregate demand. It should be noted that the years chosen to determine an average historical per capita consumption may differ depending upon historical aggregate use for that specific region.

Effectiveness of the Per Capita Consumption Model

The assumption that each person will use a certain amount of aggregate every year is a simplification of actual usage patterns, but overall, an increase in the population leads to the use of more aggregate. Over long enough periods, perhaps 20 to 30 years or more, the random impacts of major public construction projects and economic recessions tend to be smoothed and consumption trends become similar to historic per capita consumption rates. Per capita consumption is a commonly used and accepted national, state, and regional measure for purposes of forecasting.

The per capita consumption model has proved to be effective for projecting aggregate demand in major metropolitan areas. The Western San Diego and the San Gabriel Valley P-C regions are examples of how well the model works, having only a two percent (over 14 years) and an eight percent (over 29 years) difference, respectively, in actual versus projected aggregate demand (Miller, 1996, Kohler, 2010). However, the per capita model may not work well in county aggregate studies or in P-C regions that import or export a large percentage of aggregate resulting in a low correlation between P-C region production and population. In such areas, projections may be made based on historical production or multiple projections based on differing assumptions may be used to better characterize a range of future demand. For regions that export large amounts of aggregate to neighboring P-C regions, projections are based on an historical production model where 50-year aggregate demand is determined by extending a best-fit line of historical aggregate production data for a county or region. This model was used to project Yuba City-Marysville's 50-year demand because the region exports about 70 percent its aggregate into neighboring areas such as Sacramento County and Placer County. In addition, the 50-year demand

for Glenn and Tehama counties, the Palmdale P-C region, and the Temescal Valley-Orange County area was also projected using this method.

Permitted Aggregate Reserves

Approximately 4 billion tons of permitted aggregate reserves lie within the 31 aggregate study areas shown on Map Sheet 52. Permitted aggregate reserves are aggregate deposits that have been determined to be acceptable for commercial use, exist within properties owned or leased by aggregate producing companies, and have permits allowing mining of aggregate material. A “permit” is a legal authorization or approval by a lead agency, the absence of which would preclude mining operations. Although some permitted reserves face legal challenges, these reserves are included in this study pending resolution of those challenges. In California, mining permits usually are issued by local lead agencies (county or city governments). Map Sheet 52 shows permitted aggregate reserves as a percentage of the 50-year demand on each pie chart (See *Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves* section). Beneath the study area name located next to its corresponding pie chart is the amount of permitted resource in tons along with the amount of 50-year demand. These figures are also given in Table 1. Tonnages are not given for Western Merced County and for the southern Tulare County to preserve proprietary company data.

Permitted aggregate resource calculations shown on the map and in Table 1 initially were determined from information provided in reclamation plans, mining plans and use permits issued by the lead agencies. When information was inadequate to make reliable independent calculations, CGS staff used resource estimates provided by mine operators or owners. These data were checked against rough calculations made by CGS staff, and any major discrepancies were discussed with the mine operators or owners. Permitted resource calculations have been updated to account for production from 2006-2010 and are current as of the beginning of 2011.

Fifty-year Aggregate Demand Compared to Permitted Aggregate Reserves

Fifty-year aggregate demand compared to the currently permitted aggregate reserves is represented by a pie chart for each of the 31 aggregate study areas shown on Map Sheet 52. Each pie chart is located in the approximate center of the aggregate study area it represents. There are four different sizes of charts, each size representing a 50-year demand range. The smallest pie chart represents 50-year demands ranging from 25 million to 200 million tons, while the largest chart represents demands of over 800 million tons. The amount of 50-year demand in tons is shown on the map along with the amount of permitted reserves beneath the study area name located next to its corresponding pie chart (permitted reserves, left / 50-year demand, right). The whole pie represents the total 50-year aggregate demand for a particular aggregate study area. The blue portion of the pie represents the permitted aggregate resource (shown as a percentage of the 50-year demand) while the purple-colored portion of the pie represents that portion of the 50-year demand that will not be met by the currently permitted reserves. For example, if the blue portion is 25 percent and the purple portion is 75 percent of a pie chart that represents a total demand of 400 million tons, the permitted reserves are 100 million tons, and the region will need an additional 300 million tons of aggregate to supply the area for the next 50 years. The pie representing the Placer County aggregate study area (north-central California) is completely colored blue showing permitted aggregate reserves are equal to or greater than the area’s 50-year aggregate demand.

DEPARTMENT OF CONSERVATION — CALIFORNIA GEOLOGICAL SURVEY

AGGREGATE STUDY AREA ¹	50-Year Demand (million tons)	Permitted Aggregate Reserves (million tons)	Permitted Aggregate Reserves Compared to 50-Year Demand (percent)	Projected Years Remaining
Bakersfield P-C Region	438	143	33	21 to 30
Barstow-Victorville P-C Region	159	124	78	31 to 40
Claremont-Upland P-C Region	203	109	54	21 to 30
El Dorado County	76	18	24	11 to 20
Fresno P-C Region	435	46	11	10 or fewer
Glenn County	59	33	56	21 to 30
Merced County ²				
Eastern Merced County	100	50	50	21 to 30
Western Merced County	28	Proprietary	>50	31 to 40
Monterey Bay P-C Region	346	323	93	41 to 50
Nevada County	100	26	26	11 to 20
Palmdale P-C Region	577	152	26	11 to 20
Palm Springs P-C Region	295	152	52	21 to 30
Placer County	151	152	101	More than 50
North San Francisco Bay P-C Region	521	110	21	11 to 20
Sacramento County	670	42	6	10 or fewer
Sacramento-Fairfield P-C Region	196	128	65	11 to 20
San Bernardino P-C Region	993	241	24	11 to 20
San Fernando Valley / Saugus-Newhall ³	476	77	16	10 or fewer
San Gabriel Valley P-C Region	809	322	40	11 to 20
San Luis Obispo-Santa Barbara P-C Region	240	75	31	11 to 20
Shasta County	93	52	56	21 to 30
South San Francisco Bay P-C Region	1,381	404	29	11 to 20
Stanislaus County	214	45	21	11 to 20
Stockton-Lodi P-C Region	436	232	53	31 to 40
Tehama County	62	32	52	21 to 30
Temescal Valley-Orange County ³	1,077	297	28	11 to 20
Tulare County ²				
Northern Tulare County	124	27	22	11 to 20
Southern Tulare County	73	Proprietary	<50	21 to 30
Ventura County ³	298	96	32	11 to 20
Western San Diego County P-C Region	1,014	167	16	10 or fewer
Yuba City-Marysville P-C Region	403	392	97	41 to 50
Total	12,047	4,067	34	

¹ Aggregate study areas follow either a Production-Consumption (P-C) region boundary or a county boundary. A P-C region includes one or more aggregate production districts and the market area that those districts serve. Aggregate resources are evaluated within the boundaries of the P-C Region. County studies evaluate all aggregate resources within the county boundary.

² The County study has been divided into two areas, each having its own production and market area. A separate permitted resource calculation and 50-year forecast is made for each area.

³ Two P-C regions have been combined into one study area.

Table 1. Comparison of 50-year demand to permitted aggregate reserves for aggregate study areas as of January 1, 2011. (Study areas with ten or fewer years of permitted reserves are in bold type).

Except for Placer County, all of the aggregate study areas have less permitted aggregate reserves than they are projected to need for the next 50-years. Nineteen of the 31 aggregate study areas have less than half of the permitted reserves they are projected to need in the next 50 years.

Estimates of Years of Permitted Reserves Remaining

New to the 2012 update, the right hand column of Table 1 indicates the projected years of permitted reserves remaining for the various aggregate study areas. Calculations of depletion years are made by comparing the currently permitted reserves to the projected annual aggregate consumption in the study area on a year-by-year basis. This is not the same as dividing the total projected 50-year demand for aggregate by 50 because, as population increases, so does the projected annual consumption of aggregate for a study area. Data are presented as ranges; 10 or fewer, 11-20, 21-30, 31-40, 41-50, and more than 50 years. This information is included on the map beneath the study area name along with the permitted reserves and the projected 50-year demand. These estimates are based on conditions as of January 1, 2011 and do not reflect changes, such as new or expanded permits, that may have occurred since that time.

Four of the 31 aggregate study areas – Western San Diego County, Sacramento County, Fresno County, and the San Fernando Valley-Saugus Newhall area – are projected to have less than 10 years of permitted aggregate reserves remaining as of January 1, 2011. They are highlighted by red halos around the pie charts on Map Sheet 52 and appear in bold type in Table 1.

Thirteen of the 31 aggregate study areas have between 11 and 20 years of permitted aggregate reserves remaining. Several of these including the North and South San Francisco Bay study areas and the Palmdale, San Bernardino, San Gabriel Valley, Temescal Valley-Orange County and Ventura County study areas are in or adjacent to urban areas with high aggregate demands.

Eight of the 31 aggregate study areas have between 21 and 30 years of permitted aggregate reserves remaining, three have more than 31 years remaining, two have more than 41 years and one (Placer County) has more than 50 years of permitted reserves remaining.

These numbers are estimates and the actual lifespan of existing permitted reserves in a study area can be influenced by many factors. In periods of high economic growth, demand may increase, shortening the life of permitted reserves. Large projects, such as the construction or maintenance of major infrastructure, or rebuilding after a disaster such as an earthquake could also deplete permitted reserves more rapidly. Increased demand from neighboring regions with dwindling or depleted permitted reserves may also accelerate the depletion of permitted reserves in a study area. Conversely, a slow economy may reduce demand for a period of time, extending the life of permitted reserves, or new or expanded permits may be granted in a study area increasing the permitted reserves and the lifespan of permitted reserves in that area.

Non-Permitted Aggregate Resources

Non-permitted aggregate resources are deposits that may meet specifications for construction aggregate, are recoverable with existing technology, have no land use overlying them that is incompatible with mining, and currently are not permitted for mining. While not shown on Map Sheet 52, non-permitted aggregate resources are identified and discussed in each of the mineral land classification reports used to compile the map (See Appendix). There are currently an

estimated 74 billion tons of non-permitted construction aggregate resources in the 31 aggregate study areas shown on the map. While this number seems large, it is unlikely that all of these resources will ever be mined because of social, environmental, or economic factors. The location of aggregate resources too close to urban or environmentally sensitive areas can limit or prevent their development. Resources may also be located too far from a potential market to be economic. In spite of such possible constraints, non-permitted aggregate resources are the most likely future sources of construction aggregate potentially available to meet California's continuing demand. Factors used to calculate non-permitted resource amounts and to determine the aerial extent of these resources, are given in each of the aggregate classification reports listed in the Appendix.

Aggregate Production Areas and Districts

Aggregate production areas are shown on the map by five different sizes of triangle. A triangle may represent one or more active aggregate mines. The relative size of each symbol corresponds to the amount of yearly production for each mine or group of mines. Yearly production was based on data from the Department of Conservation's Office of Mine Reclamation (OMR) records for the calendar year 2010. The smallest triangle represents a production area that produces less than 0.5 million tons of aggregate in 2010. These triangles represent a single mine operation. About 90 percent of the production areas on the map fall into this category, and many are located in rural parts of the state. The largest triangle represents aggregate mining districts with production of more than 5 million tons in 2010. Only two aggregate production districts fall into this category – the Temescal Valley District in western Riverside County and the San Gabriel Valley District in Los Angeles County. It should be noted that, because of the economic slowdown from 2007 to 2010, the tonnages represented by the triangles on the 2012 map are different from those on the 2006 map.

PART II COMPARISONS BETWEEN THE PRIOR (2006) AND THE UPDATED (2012) MAP SHEET 52

The prior version of Map Sheet 52 was completed and published in 2006. Permitted aggregate resource data for that map were current as of January 1, 2006. Work conducted for that study took place during 2006. The latest aggregate production and location data available for the prior map were from 2005 records. The aggregate demand projections for the prior map were based on DOF county population projections from the 2000 U.S. census. Fifty-year aggregate demand from January 1, 2006 through the year 2055 was determined for 31 study areas.

This updated Map Sheet 52 was completed and published in 2012. **Permitted aggregate resource data for the updated map is current as of January 1, 2011.** All work conducted for the updated study also took place during 2012. The latest aggregate production and location data available for the updated map are from 2010 records. The aggregate demand projections for the updated map were based on DOF county population projections from the 2010 U.S. census. Fifty-year aggregate demand from January 1, 2011 through the year 2060 was determined for 31 study areas.

Changes have occurred in both aggregate supplies (permitted aggregate reserves) and in 50-year aggregate demand in the five years since the prior Map Sheet 52 update was completed. Changes in permitted aggregate reserves between the prior Map Sheet 52 (2006) and updated Map Sheet 52 (2012) are shown in Table 2. Table 3 compares the changes in 50-year demand between Map Sheet 52 (2006) and the updated 2012 map.

Aggregate Study Area Changes

Six aggregate study areas on the original (2002) Map Sheet 52 were modified for the 2006 map, resulting in three fewer study areas. They included the Southern California P-C regions of Orange County, Temescal Valley, San Fernando Valley, Saugus-Newhall, Western Ventura County, and Simi Valley. These regions were combined into three regions when they began to run out of permitted reserves and became dependant on aggregate sources from neighboring regions. The importation of aggregate from neighboring regions typically results in longer haul distances, higher costs, and increased carbon dioxide emissions, air pollution, traffic congestion, and highway maintenance. The shift in supply area also results in more rapid depletion of permitted reserves in neighboring regions.

No additional study areas have been combined in this update. It is likely that in some future update the San Fernando Valley-Saugus Newhall aggregate study area and the Palmdale study area may be combined as permitted reserves in the San Fernando Valley-Saugus Newhall aggregate study area are depleted.

Changes in Permitted Aggregate Reserves

Twenty-four of the 31 study areas shown on the updated map experienced a decrease in permitted aggregate reserves since the 2006 map was completed (See Table 2). Included in these 24 areas are Western Merced County and Southern Tulare County. Permitted reserves for both of these county study areas cannot be shown because they are proprietary.

DEPARTMENT OF CONSERVATION — CALIFORNIA GEOLOGICAL SURVEY

AGGREGATE STUDY AREA	Permitted Aggregate Reserves as of 1/1/06 (million tons) Map Sheet 52, 2006	Permitted Aggregate Reserves as of 1/1/11 (million tons) Map Sheet 52, 2012	Percent Difference (%)
Bakersfield P-C Region	115	143	24
Barstow Victorville P-C Region	133	124	-7
Claremont-Upland P-C Region	147	109	-26
Eastern Merced County	53	50	-6
El Dorado County	19	18	-5
Fresno P-C Region	71	46	-35
Glenn County	17	33	94
Monterey Bay P-C Region	347	323	-7
Nevada County	31	26	-16
Northern Tulare County	12	27	125
North San Francisco Bay P-C Region	49	110	124
Palmdale P-C Region	181	152	-16
Palm Springs P-C Region	176	152	-14
Placer County	45	152	238
Sacramento County	67	42	-37
Sacramento-Fairfield P-C Region	164	128	-22
San Bernardino P-C Region	262	241	-8
San Fernando Valley-Saugus Newhall *	88	77	-13
San Gabriel Valley P-C Region	370	322	-13
San Luis Obispo-Santa Barbara P-C Region	77	75	-3
Shasta County	51	52	2
Southern Tulare County	Proprietary	Proprietary	Proprietary
South San Francisco Bay P-C Region	458	404	-12
Stanislaus County	51	45	-12
Stockton Lodi P-C Region	196	232	18
Tehama County	36	32	-11
Temescal Valley-Orange County*	355	297	-16
Ventura County (combined Western Ventura County and Simi Valley P-C Region)*	106	96	-9
Western Merced County	Proprietary	Proprietary	Proprietary
Western San Diego County P-C Region	198	167	-16
Yuba City-Marysville P-C Region	409	392	-4
Total	4,343	4,067	-6

* Two P-C Regions have been combined into one study area

Table 2. Comparison of permitted aggregate reserves between Map Sheet 52, 2006 and Map Sheet 52, 2012.

AGGREGATE SUSTAINABILITY IN CALIFORNIA — MAP SHEET 52 (UPDATED 2012)

AGGREGATE STUDY AREA	50-Year Demand as of 1/1/06 (million tons) Map Sheet 52, 2006	50-Year Demand as of 1/1/11 (million tons) Map Sheet 52, 2012	Percent Difference (%)
Bakersfield P-C Region	252	438	74
Barstow-Victorville P-C Region	179	159	-11
Claremont-Upland P-C Region	300	203	-32
Eastern Merced County	106	100	-6
El Dorado County	91	76	-16
Fresno P-C Region	629	435	-31
Glenn County	83	59	-29
Monterey Bay P-C Region	383	346	-10
Nevada County	122	100	-18
Northern Tulare County	117	124	6
North San Francisco Bay P-C Region	647	521	-19
Palmdale P-C Region	665	577	-13
Placer County	171	151	-12
Palm Springs P-C Region	295	295	0
Sacramento County	733	670	-9
Sacramento-Fairfield P-C Region	235	196	-17
San Bernardino P-C Region	1,074	993	-8
San Fernando Valley/Saugus Newhall *	457	476	4
San Gabriel Valley P-C Region	1,148	809	-30
San Luis Obispo-Santa Barbara P-C Region	243	240	-1
Shasta County	122	93	-24
Southern Tulare County	88	73	-17
Stanislaus County	344	214	-38
Stockton Lodi P-C Region	728	436	-40
South San Francisco Bay P-C Region	1,244	1381	11
Tehama County	72	62	-14
Temescal Valley-Orange County *	1,122	1,077	-4
Ventura County (combined Western Ventura County and Simi Valley P-C Regions) *	309	298	-4
Western Merced County	53	28	-47
Western San Diego County P-C Region	1,164	1014	-13
Yuba City-Marysville P-C Region	360	403	12
Total	13,536	12,047	-11

* Two P-C Regions have been combined into one study area

Table 3. Comparison of 50-year demand between Map Sheet 52, 2006 and Map Sheet 52, 2012.

Seven of the study areas shown on the updated map had increases in permitted aggregate reserves. Most of these increases are because of newly permitted or expanded mining operations. An expansion may increase the footprint of the mine or increase permitted mining depth. Significant increases exceeding 50 percent occurred in the Placer County, Glenn County, Northern Tulare County, and the North San Francisco Bay aggregate study areas (See Table 2).

Total permitted reserves for all 31 areas decreased from 4,343 million tons to 4,067 million tons – an apparent reduction of 276 million tons. Most of this reduction was because of aggregate consumption. Other potential reasons for reductions in permitted aggregate reserves include social and economic conditions leading to mine closures, regulatory changes, or natural variations in the quality of aggregate deposits. Actual production was greater but was offset in part by increases in permitted reserves in some study areas.

Changes in Fifty-Year Demand

Of the 31 study areas shown on the updated Map Sheet 52 five had increases in 50-year demand, one remained constant, and 25 showed decreases in projected 50-year demand (See Table 3). The large number of study areas with decreasing 50-year demand is due in large part to the new population projections used in forecasting. The new county population projections (State of California Department of Finance, 2012) are based on the 2010 U.S. census and project lower growth rates for much of California compared to the projections used in the previous versions of this study. Newly updated per capita consumption numbers may also have contributed to changes in projected 50-year demand.

The large increase (74 percent) in the 50-year demand for the Bakersfield study area is due to the use of newer population projections than were used in the original study and previous versions of this study.

Changes in Permitted Aggregate Reserves and Demand

Table 4 shows the percentages of permitted reserves compared to the 50-year demand for the 2006 and updated 2012 Map Sheet 52. These percentages are represented on both maps as pie charts – the blue portion of the pie depicting percentage of the 50-year demand met with current permitted reserves. Increases occurred in 14 of the 29 study areas that can be compared and no change or decreases occurred in 15 study areas.

The large increases in some of these study areas (Glenn County, North San Francisco Bay, Northern Tulare County, Placer County, Shasta County, and Stockton-Lodi) were because of new or expanded permits resulting in additional permitted aggregate reserves. Many of the small increases are not due to new or modified permits, but are a result of low production rates during the economic slowdown from 2007 to 2010 and the lower projected 50-year demand in many study areas based on updated population forecasts used in the 2012 update. Similarly those study areas with no change or small decreases may also have been influenced by these factors.

Comparison of Areas with Less than 10-Years of Permitted Aggregate Reserves

The 2012 Map Sheet 52 shows four aggregate study areas with less than a 10-year supply of permitted aggregate reserves – Sacramento County, Fresno County, San Fernando Valley-Saugus Newhall, and the Western San Diego County P-C Regions. The map shows these areas with red halos around the pie charts. Compared to the 2006 version of the map, the San Fernando Valley-Saugus Newhall study area is a new addition to this group while the North San Francisco Bay and Northern Tulare County study areas have been removed.

DEPARTMENT OF CONSERVATION — CALIFORNIA GEOLOGICAL SURVEY

AGGREGATE STUDY AREA	Percentage of Permitted Aggregate Reserves as Compared to 50-Year Demand as of 1/1/06 Map Sheet 52, 2006	Percentage of Permitted Aggregate Reserves as Compared to 50-Year Demand as of 1/1/11 Map Sheet 52, 2012	Difference
Bakersfield P-C Region	46	33	-13
Barstow-Victorville P-C Region	74	78	4
Claremont-Upland P-C Region	49	54	5
Eastern Merced County	50	50	0
El Dorado County	21	24	3
Fresno P-C Region	11	11	0
Glenn County	21	56	35
Monterey Bay P-C Region	91	93	2
Nevada County	25	26	1
Northern Tulare County	10	22	12
North San Francisco Bay P-C Region	8	21	13
Palmdale P-C Region	27	26	-1
Palm Springs P-C Region	60	52	-8
Placer County	26	101	75
Sacramento County	9	6	-3
Sacramento-Fairfield P-C Region	70	65	-5
San Bernardino P-C Region	24	24	0
San Fernando Valley/Saugus Newhall *	19	16	-3
San Gabriel Valley P-C Region	32	40	8
San Luis Obispo-Santa Barbara P-C Region	32	31	-1
Shasta County	42	56	14
Southern Tulare County	Proprietary	Proprietary	
Stanislaus County	15	21	6
Stockton Lodi P-C Region	27	53	26
South San Francisco Bay P-C Region	37	29	-8
Tehama County	49	52	3
Temescal Valley-Orange County *	32	28	-4
Ventura County (combined Western Ventura County and Simi Valley P-C Regions) *	34	32	-2
Western Merced County	Proprietary	Proprietary	
Western San Diego County P-C Region	17	16	-1
Yuba City-Marysville P-C Region	100	97	-3

* Two P-C Regions have been combined into one study area

Table 4. Percentage of permitted aggregate reserves as compared to 50-year demand for Map Sheet 52, 2006 and Map Sheet 52, 2012.

PART III: OVERVIEW OF CONSTRUCTION AGGREGATE

Construction aggregate was the leading non-fuel mineral commodity produced in California in 2010. Valued at \$1.19 billion, aggregate made up about 41 percent of California's \$2.9 billion non-fuel mineral production in 2010.

Aggregate Quality and Use

Aggregate normally makes up 80 to 100 percent of the material volume in PCC and AC and provides the bulk and strength to these materials. Rarely, even from the highest-grade deposits, is in-place aggregate physically or chemically suited for every type of aggregate use. Every potential deposit must be tested to determine how much of the material can meet specifications for a particular use, and what processing is required. Specifications for PCC, AC, and various other uses of aggregate have been established by several agencies, such as the U.S. Bureau of Reclamation, the U.S. Army Corps of Engineers, and the California Department of Transportation to ensure that aggregate is satisfactory for specific uses. These agencies and other major consumers test aggregate using standard test procedures of the American Society for Testing Materials (ASTM), the American Association of State Highway Officials, and other organizations.

Most PCC and AC aggregate specifications have been established to ensure the manufacture of strong, durable structures capable of withstanding the physical and chemical effects of weathering and use. For example, specifications for PCC and concrete products prohibit or limit the use of rock materials containing mineral substances such as gypsum, pyrite, zeolite, opal, chalcedony, chert, siliceous shale, volcanic glass, and some high-silica volcanic rocks. Gypsum retards the setting time of portland cement; pyrite dissociates to yield sulfuric acid and an iron oxide stain; and other substances contain silica in a form that reacts with alkali substances in the cement, resulting in cracks and "pop-outs." Alkali reactions in PCC can be minimized by the addition of pozzolanic admixtures such as fly ash or naturally occurring pozzolanic materials. Pozzolans are siliceous or siliceous and aluminous material of natural or artificial origin that, in the presence of moisture, reacts with calcium hydroxide to form cementitious compounds.

Specifications also call for precise particle-size distribution for the various uses of aggregate that is commonly classified into two general sizes: coarse and fine. Coarse aggregate is rock retained on a 3/8-inch or a #4 U.S. sieve. Fine aggregate passes a 3/8-inch sieve and is retained on a #200 U.S. sieve (a sieve with 200 weaves per inch). For some uses, such as asphalt paving, particle shape is specified. Aggregate material used with bituminous binder (asphalt) to form sealing coats on road surfaces shall consist of at least 90% by weight of crushed particles. Crushed stone is preferable to natural gravel in asphaltic concrete (AC) because asphalt adheres better to broken surfaces than to rounded surfaces and the interlocking of angular particles strengthens the AC and road base.

The material specifications for PCC and AC aggregate are more restrictive than specifications for other applications such as Class II base, subbase, and fill. These restrictive specifications make deposits acceptable for use as PCC or AC aggregate, the scarcest and most valuable aggregate resources. Aggregate produced from such deposits can be, and commonly is, used in applications other than concrete. PCC- and AC-grade aggregate deposits are of major importance when planning for future availability of aggregate commodities because of their versatility, value, and relative scarcity.

Factors Affecting Aggregate Deposit Quality

The major factors that affect the quality of construction aggregate are the rock type and the degree of weathering of the deposit. Rock type determines the hardness, durability, and potential chemical reactivity of the rock when mixed with cement to make concrete. In alluvial sand and gravel deposits, rock type is variable and reflects the rocks present in the drainage basin of the stream or river. In crushed stone deposits, rock type is typically less variable, although in some types of deposits, such as sandstones or volcanic rocks, there may be significant variability of rock type within a deposit. Rock type may also influence aggregate shape. For example, some metamorphic rocks such as slates tend to break into thin platy fragments that are unsuitable for many aggregate uses, while many volcanic and granitic rocks break into blocky fragments more suited to a wide variety of aggregate uses. Deposit type also affects aggregate shape. For example, in alluvial sand and gravel deposits, the natural abrasive action of the stream rounds the edges of rock particles, in contrast to the sharp edges of particles from crushed stone deposits.

Weathering is the in-place physical or chemical decay of rock materials at or near the Earth's surface. Weathering commonly decreases the physical strength of the rock and may make the material unsuitable for high strength and durability uses. Weathering may also alter the chemical composition of the aggregate, making it less suitable for some aggregate uses. If weathering is severe enough, the material may not be suitable for use as PCC or AC aggregate. Typically, the older a deposit is, the more likely it has been subjected to weathering. The severity of weathering commonly increases with increasing age of the deposit.

Comparison of Alluvial Sand and Gravel to Crushed Stone Aggregate

The preferred use of one aggregate material over another in construction practices depends not only on specification standards, but also on economic considerations. Alluvial gravel is typically preferred to crushed stone for PCC aggregate because the rounded particles of alluvial sand and gravel result in a wet mix that is easier to work than a mix made of angular fragments. Also, crushed stone is less desirable in applications where the concrete is placed by pumping because sharp edges will increase wear and damage to the pumping equipment. The workability of a mix consisting of portland cement with crushed stone aggregate can be improved by adding more sand and water, but more cement must then be added to the mix to meet concrete durability standards. This results in a more expensive concrete mix and a higher cost to the consumer. In addition, aggregate from a crushed stone deposit is typically more expensive than that from an alluvial deposit due to the additional costs associated with the ripping, drilling and blasting necessary to remove material from most quarries and the additional crushing required to produce the various sizes of aggregate. Manufacturing sand by crushing is more costly than mining and processing naturally occurring sand. Although more care is required in pouring and placing a wet mix containing crushed stone, PCC made with this aggregate is as satisfactory as that made with alluvial sand and gravel of comparable rock quality. Owing to environmental concerns and regulatory constraints in many areas of the state, it is likely that extraction of sand and gravel resources from instream and floodplain areas will become less common in the future. If this trend continues, crushed stone may become increasingly important to the California market.

Aggregate Price

The price of aggregate throughout California varies considerably depending on location, quality, and supply and demand. The highest quality aggregate, and typically most costly, is that which meets the California Department of Transportation's specifications for use in Portland Cement Concrete (PCC). All prices discussed in this section are for PCC-grade aggregate at the plant site or FOB (freight on board). Transportation cost, which adds to the final cost of aggregate, is discussed in the next section.

Regional variations make it difficult to estimate the average price of PCC-grade aggregate for the state. Over the last decade, prices have varied from \$20 per ton or more in areas with depleting or depleted aggregate supplies and high demands to \$7 to \$8 per ton in areas with abundant aggregate supplies and low to moderate demands.

In the last decade, the highest prices aggregate in the state have been in the San Diego area, where PCC-grade sand is in short supply, causing prices to range up to \$20-\$22 per ton and in parts of the San Francisco Bay area where sand has also been in short supply and prices have ranged from \$15 to \$19 per ton.

In the Los Angeles metropolitan areas prices have been in the \$13 to \$16 per ton range with aggregate from the sparsely populated Palmdale area at about \$10 per ton. Aggregate from Palmdale is also transported to Ventura County – a haul distance of about 60 miles, and into the San Fernando Valley-Saugus Newhall area. The cost of transportation in these cases adds significantly to the final cost of the aggregate.

In the Central Valley, prices have ranged from \$7 to \$8 per ton in the Yuba City-Marysville area where aggregate supplies are abundant to \$10 to \$11 per ton in the Sacramento and Stockton-Lodi areas. In the Southern Valley, prices have been somewhat higher, about \$12 per ton in the Bakersfield region and \$14 to \$18 per ton in the Fresno and northern Tulare areas.

Transportation and Increasing Haul Distances

Transportation plays a major role in the cost of aggregate to the consumer. Aggregate is a low-unit-value, high-bulk-weight commodity, and it must be obtained from nearby sources to minimize both the dollar cost to the aggregate consumer and other environmental and economic costs associated with transportation. If nearby sources do not exist, then transportation costs may significantly increase the cost of the aggregate by the time it reaches the consumer. For straight hauls with minimal traffic, the price of aggregate increases about 15 cents per ton for every mile that it is hauled from the plant according to industry sources. Currently, transporting aggregate a distance of 30 miles will increase the FOB price by about \$4.50 per ton. For example, 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 at the mine. In major metropolitan areas, this rate is often greater because of heavy traffic that increases the haul time. Other factors that affect hauling rates include toll bridges and toll roads, road conditions, and routes in hilly or mountainous areas. Transportation cost is the principal constraint defining the market area for an aggregate mining operation.

Throughout California, aggregate haul distances have been gradually increasing as more local sources of aggregate diminish. Consequently, older P-C regions, most of which were established in the late 1970s have changed considerably since their boundaries were drawn. This is especially evident in Los Angeles, Orange, and Ventura counties where aggregate shortages have led to the merging of six P-C regions shown on the original (2002) map into three regions for the updated maps.

Increased aggregate haul distances not only increase the cost of aggregate to the consumer, but also increase environmental and societal impacts such as increased fuel consumption, carbon dioxide emissions, air pollution, traffic congestion and road maintenance.

Factors Affecting Aggregate Demand

Several factors may influence aggregate demand. In periods of high economic growth, demand may increase, depleting permitted reserves more rapidly than expected. Large projects, such as the construction or maintenance of major infrastructure, or rebuilding after a disaster such as an earthquake could also deplete permitted reserves more rapidly. Increased demand from neighboring regions with dwindling or depleted permitted reserves may also accelerate the depletion of permitted reserves in a study area. Conversely, a period of declining economy or of low economic growth, such as that during the recession of 2007 to 2009 and the subsequent slow economic recovery, can reduce demand for a period of time, extending the life of permitted reserves. In some cases, importation of aggregate from other areas may extend the life of a region's permitted reserves.

SUMMARY AND CONCLUSIONS

Aggregate is essential to the needs of modern society, providing material for the construction and maintenance of roadways, dams, canals, buildings and other parts of California's infrastructure. Aggregate is also found in homes, schools, hospitals and shopping centers. In the 30-year period from 1981 to 2010, Californians consumed an average of more than 180 million tons of construction aggregate (all grades) per year or about 5.7 ton per person per year. Demand for aggregate is expected to increase as the state's population continues to grow and infrastructure is maintained, improved, and expanded. Because aggregate is a low unit-value, high bulk weight commodity, it must be obtained from nearby sources to minimize the dollar cost to the aggregate consumer and other environmental and economic costs associated with transportation.

For the last 33 years, under the Surface Mining and Reclamation Act, CGS has conducted on-going studies that identify and evaluate aggregate resources throughout the state. Map Sheet 52 (2012) is an updated summary of supply and demand data from these studies. The map presents a statewide overview of future aggregate needs and currently permitted reserves.

The following conclusions can be drawn from Map Sheet 52 (2012) and this accompanying report:

- In the next 50 years, the 31 study areas identified on Map sheet 52 (2012) will need approximately 12 billion tons of aggregate.
- The 31 study areas currently have about 4 billion tons of permitted reserves, which is about one third of the total projected 50-year aggregate demand identified for these study areas. This is about 5.5 percent of the total aggregate resources located within the 31 study areas.
- Four of the aggregate study areas are projected to have 10 or fewer years of permitted aggregate reserves remaining as of January 2011 (pie charts highlighted with red borders).
- Thirteen of the 31 aggregate study areas have between 11 and 20 years of aggregate reserves remaining.
- Eight of the 31 aggregate study areas have between 21 and 30 years of aggregate reserves remaining.
- Three of the 31 aggregate study areas have between 31 and 40 years of aggregate reserves remaining.
- Two of the 31 aggregate study areas have between 41 and 50 years of aggregate reserves remaining.
- One of the 31 aggregate study areas (Placer County) has more than 50 years of aggregate reserves remaining.

The information presented on Map Sheet 52 (2012) and in the referenced reports is provided to assist land use planners and decision makers in identifying those areas containing construction aggregate resources, and to quantify potential future demand for these resources in different regions of the state. This information is intended to help planners and decision makers balance the need for construction aggregate with the many other competing land use issues in their jurisdictions, and to provide for adequate supplies of construction aggregate to meet future needs.

REFERENCES CITED

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Division of Mines and Geology, 2000, California surface mining and reclamation policies and procedures: Special Publication 51, third revision.

Kohler, S.L., 2002, Aggregate Availability in California, California Geological Survey, Map Sheet 52, scale 1:1,100,000, 26p.

Kohler, S.L., 2006, Aggregate Availability in California, California Geological Survey, Map Sheet 52 (Updated 2006), scale 1:1,100,000, 26p.

Kohler, S.L., 2010, Update of mineral land classification for Portland cement concrete-grade aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California.

Miller, R.V., 1996, Update of minerals land classification: aggregate materials in the western San Diego County Production-Consumption Region.

State of California, Department of Finance, *Interim Population Projections for California and Its Counties 2010-2050*, Sacramento, California, May 2012.

APPENDIX: MINERAL LAND CLASSIFICATION REPORTS BY THE CALIFORNIA GEOLOGICAL SURVEY (Special Reports and Open-File Reports, with information on aggregate resources)

SPECIAL REPORTS

- SR 132: Mineral Land Classification: Portland Cement Concrete-Grade Aggregate in the Yuba City-Marysville Production-Consumption Region.
By Habel, R.S., and Campion, L.F., 1986.
- *SR 143: Part I: Mineral Land Classification of the Greater Los Angeles Area: Description of the Mineral Land Classification Project of the Greater Los Angeles Area.
By Anderson T. P., Loyd, R.C., Clark, W.B., Miller, R.M., Corbaley, R., Kohler, S.L., and Bushnell, M.M., 1979.
- *SR 143: Part II: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Fernando Valley Production-Consumption Region.
By Anderson T.P., Loyd, R.C., Clark, W.B., Miller, R.M., Corbaley, R., Kohler, S.L., and Bushnell, M.M., 1979.
- *SR 143: Part III: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, Orange County-Temescal Valley Production-Consumption Region.
By Miller, R.V., and Corbaley, R., 1981.
- *SR 143: Part IV: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.
By Kohler, S.L., 1982.
- *SR 143: Part V: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, Saugus-Newhall Production-Consumption Region and Palmdale Production-Consumption Region.
By Joseph, S.E, Miller, R.V., Tan, S.S., and Goodman, R.W., 1987.
- *SR 143: Part VI: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, Claremont-Upland Production-Consumption Region.
By Cole, J.W., 1987.
- *SR 143: Part VII: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Bernardino Production-Consumption Region.
By Miller, R.V., 1987.

- *SR 145: Part I: Mineral Land Classification of Ventura County: Description of the Mineral Land Classification Project of Ventura County.
By Anderson, T.P., Loyd, R.C., Kiessling, E.W., Kohler, S.L., and Miller, R.V., 1981.
- *SR 145: Part II: Mineral Land Classification of Ventura County: Classification of the Sand, Gravel, and Crushed Rock Resource Areas, Simi Production-Consumption Region.
By Anderson, T.P., Loyd, R.C., Kiessling, E.W., Kohler, S.L., and Miller, R.V., 1981.
- *SR 145: Part III: Mineral Land Classification of Ventura County: Classification of the Sand and Gravel, and Crushed Rock Resource Areas, Western Ventura County Production-Consumption Region.
By Anderson, T.P., Loyd, R.C., Kiessling, E.W., Kohler, S.L., and Miller, R.V., 1981.
- *SR 146: Part I: Mineral Land Classification: Project Description: Mineral Land Classification for Construction Aggregate in the San Francisco-Monterey Bay Area.
By Stinson, M.C., Manson, M.W., and Plappert, J.J., 1987.
- *SR 146: Part II: Mineral Land Classification: Aggregate Materials in the South San Francisco Bay Production-Consumption Region.
By Stinson, M.C., Manson, M.W., and Plappert, J.J., 1987.
- *SR 146: Part III: Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region.
By Stinson, M.C., Manson, M.W., and Plappert, J.J., 1987.
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- *SR 147: Mineral Land Classification: Aggregate Materials in the Bakersfield Production-Consumption Region.
By Cole, J.W., 1988.
- *SR 153: Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region.
By Kohler, S.L., and Miller, R.V., 1982.
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- *SR 158: Mineral Land Classification: Aggregate Materials in the Fresno Production-Consumption Region.
By Cole, J.W., and Fuller, D.R., 1986.
- *SR 159: Mineral Land Classification: Aggregate Materials in the Palm Springs Production-Consumption Region.
By Miller, R.V., 1987.
- *SR 160: Mineral Land Classification: Portland Cement Concrete-Grade Aggregate in the Stockton-Lodi Production-Consumption Region.
By Jensen, L.S., and Silva, M.A., 1989.
- *SR 162: Mineral Land Classification: Portland Cement Concrete Aggregate and Active Mines of All Other Mineral Commodities in the San Luis Obispo-Santa Barbara Production-Consumption Region.
By Miller, R.V., Cole, J.W., and Clinkenbeard, J.P., 1989.
- SR 164: Mineral Land Classification of Nevada County, California.
By Loyd, R.C., and Clinkenbeard, J.P., 1990.
- SR 165: Mineral Land Classification of the Temescal Valley Area, Riverside County, California.
By Miller, R.V., Shumway, D.O., and Hill, R.L., 1991.
- SR 173: Mineral Land Classification of Stanislaus County, California.
By Higgins, C.T., and Dupras, D.L., 1993.
- SR 198: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the Palm Springs Production-Consumption Region, Riverside County, California. Busch, L.L., 2007.
- SR 199: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the Stockton-Lodi Production-Consumption Region, San Joaquin and Stanislaus Counties, California. Smith, J.D. and Clinkenbeard J.P., 2012.
- SR202: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the Claremont-Upland Production-Consumption Region, Los Angeles and San Bernardino Counties, California. Miller, R.V. and Busch, L.L., 2007.
- SR 205: Update of Mineral Land Classification of Aggregate Resources in the North San Francisco Bay P-C Region: Sonoma, Napa, and Marin Counties and Southwestern Solano County, California. Miller, R.V. and Busch, L.L., 2012 (in progress)
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AGGREGATE SUSTAINABILITY IN CALIFORNIA — MAP SHEET 52 (UPDATED 2012)

- SR 209 Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. Kohler, S.L., 2010.
- SR 210 Update of Mineral Land Classification: Aggregate Materials in the Bakersfield Production-Consumption Region, Kern County, California. Busch, L.L., 2009.
- SR 215 Update of Mineral Land Classification: Aggregate Materials in the San Luis Obispo-Santa Barbara Production-Consumption Region, California. Busch, L.L. and Miller, R.V., 2011.

* These Mineral Land Classification reports have been updated and are not shown on the index map (lower left-hand corner of Map Sheet 52).

OPEN-FILE REPORTS

- OFR 92-06: Mineral Land Classification of Concrete Aggregate Resources in the Barstow-Victorville Area. By Miller, R.V., 1993.
- OFR 93-10: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part I - Ventura County. By Miller, R.V., 1993.
- OFR 94-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part II - Los Angeles County. By Miller, R.V., 1994.
- OFR 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part III - Orange County. By Miller, R.V., 1995.
- OFR 95-10: Mineral Land Classification of Placer County, California. By Loyd, R.C., 1995.
- OFR 96-03: Update of Mineral Land Classification: Aggregate Materials in the South San Francisco Bay Production-Consumption Region. By Kohler-Antablin, S.L., 1996.
- OFR 96-04: Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region. By Miller, R.V., 1996.
- OFR 97-01: Mineral Land Classification of Concrete Aggregate Resources in the Tulare County Production-Consumption Region, California. By Taylor, G.C., 1997.
- OFR 97-02: Mineral Land Classification of Concrete-Grade Aggregate Resources in Glenn County, California. By Shumway, D.O., 1997.

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- OFR 97-03: Mineral Land Classification of Alluvial Sand and Gravel, Crushed Stone, Volcanic Cinders, Limestone, and Diatomite within Shasta County, California.
By Dupras, D.L., 1997.
- OFR 99-01: Update of Mineral Land Classification: Aggregate Materials in the Monterey Bay Production-Consumption Region, California. By Kohler-Antablin, S.L., 1999.
- OFR 99-02: Update of Mineral Land Classification: Aggregate Materials in the Fresno Production-Consumption Region, California.
By Youngs, L.G. and Miller, R.V., 1999.
- OFR 99-08: Mineral Land Classification of Merced County, California.
By Clinkenbeard, J.P., 1999.
- OFR 99-09: Mineral Land Classification: Portland Cement Concrete-Grade Aggregate and Clay Resources in Sacramento County, California. By Dupras, D.L., 1999.
- OFR 2000-03: Mineral Land Classification of El Dorado County, California.
By Busch L.L., 2001
- OFR 2000-18: Mineral Land Classification of Concrete-Grade Aggregate Resources in Tehama County, California. By Foster, B.D., 2001



May 16, 2014

City of Brea

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

SUBJECT: Draft Significant Ecological Areas (SEA) and Hillside Management (HMO) Ordinances for the unincorporated areas of Los Angeles County

Dear Ms. Howard:

I am writing in regard to the subject issues and to express the City of Brea's continued interest on these efforts. Thank you for this further opportunity to comment on the County's draft ordinances. We greatly appreciate the relationship our jurisdictions have enjoyed and continuing that tradition of inter-governmental cooperation. This is particularly important in the consideration of environmental issues, where our jurisdictions share a common border within a constrained hillside environment.

I appreciate our phone conversation earlier this week to update me on the County's process and progress toward adoption of the subject ordinances. As we discussed, the City has historically expressed our concern that any development approach for the hills be sensitive and respectful of resources and landforms and the general context of hillside areas. To that end, we've provided comments in the past regarding the County's drafts for SEA and Hillside Management Ordinances (incorporated here by reference).

The City appreciates the County's approach for SEA's and its HMO which will afford complete and participatory review of any future development project's for these sensitive lands. We encourage the County to maintain such an approach and look forward to participating in any review of such future projects as they may be proposed near our community.

Thank you again for this additional opportunity to comment. Please feel free to reach me at (714) 990-7674 if you should have any questions regarding our comments.

Sincerely,

David M. Crabtree, AICP
Community Development Acting Director

City Council

Brett Murdock
Mayor

Christine Marick
Mayor Pro Tem

Ron Garcia
Council Member

Roy Moore
Council Member

Marty Simonoff
Council Member

Ms. Emma Howard
May 16, 2014
Page 2

cc: Tim O'Donnell, City Manager
Bill Gallardo, Acting City Manager
Eric Nicoll, Community Development Director

From: douglaspfay@aol.com
To: [Emma Howard](#)
Cc: todd@tcardiffllaw.com
Subject: LA County General Plan Update (GPU) SEA Draft comments by Douglas Fay
Date: Monday, June 23, 2014 11:59:47 AM

Dear LA County GPU and Planning Representatives,

In addition to my comments submitted in April 2014, I am submitting these draft suggestions:

The current proposed mapping designates the Oxford Basin in Marina Del Rey as Open Space (OS), when in fact it is primarily water, currently tidally influenced, a dedicated Bird Conservation Area (delineated as a BCA in previous County maps), and managed through LACFCD as a flood protection basin. It should be mapped according to its designation and primary setting "BCA - W". Establishing BCA language consistent with similar State, Federal, and California Audubon guidelines is needed.

VOLUNTEER PROGRAMS IN SEAs (or Countywide - not specific to the Oxford Basin)

Volunteer guidelines and policy appears to be absent from the SEA draft language, and should be exempt from requiring a use permit and/or significant fees.

Volunteer programs in SEAs should include litter removal, invasive weed removal, native plant planting, bird and wildlife counting, and other ecology oriented events under direct supervision of a biologist or qualified person(s).

Volunteer qualification and training guidelines need to be established including, but not limited to, online training, documented experience, internships, etc.

Organization of volunteer programs can be through SEATAC and/or other applicable County Departments.

Liability release forms should be mandatory for all volunteer programs.

Partnering with environmental groups, for example: Project AWARE, Heal The Bay, the Sierra Club, the California Coastal Commission, and others including neighborhood and community groups, should be encouraged.

Respectfully submitted,

Douglas Fay
644 Ashland Ave Apt A
Santa Monica, CA 90405
email: douglaspfay@aol.com



July 7, 2014

Carl Nadela, AICP, Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

**RE: Notice of Preparation for Los Angeles County Antelope Valley Areawide
General Plan Update (AVAP)**

Dear Mr. Nadela:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. For your reference, EHL is Southern California's only regional conservation group.

EHL first wishes to voice its strong support for the expanded Significant Ecological Areas (SEAs) that are proposed¹. These are a foundation for the future of the County and are the repository of the citizens' natural heritage.

"Smart growth" planning reduces the land consumed for development, reduces GHG emissions, and protects natural resources while accommodating population and job growth. We therefore support a framework of Town Centers and Rural Preserve Areas. Contingent upon location, Economic Opportunity Areas (EOAs) also make sense. Our comments focus on how to implement these goals.

Due to a long history of large lot parcelization in the Antelope Valley, achieving the town and preserve framework will be challenging. Even where lands are rezoned to 1 unit per 20 acres, this will be insufficient to protect the biological values of the most important preserve areas, that is, the Significant Ecological Areas (SEAs). Such densities, on top of existing parcelization, create habitat fragmentation and edge effects incompatible with maintaining existing biological values. (See enclosure, documenting adverse impacts beginning roughly at 1:40.) In addition, the EOAs as proposed will cause significant growth induction along highway infrastructure, which would obviate the goal of community separation via rural preserves.

We therefore request that the Antelope Valley Update and its EIR contain four measures to address the adverse impacts of development and to achieve the goal of

¹ When determining the compatibility of the proposed AVAP with an affected SEA, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which in effect clusters development on a larger scale, albeit with some of the resulting ecological benefit occurring on the other side of a jurisdictional boundary.

preserves. Where possible, these should be included in the AVAP as feasible *mitigation measures* for the reduction of biological and other impacts, allowing subsequent, expeditious tiering by future development during CEQA review.

Reduced densities in environmentally constrained land

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more distant locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs). These same areas typically have high fire hazard. Reducing density automatically puts less life and property at risk of fire and, during a fire event, ensures that limited fire-fighting resources are spent stopping the fire’s spread rather than defending dispersed home sites that should not have been built in the first place.

Therefore, outside of urban centers and EOAs, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category². *Within SEAs, it is particularly vital to retain the RL40 densities that were changed in the most recent draft map to RL20.* But in any case, RL40 within SEAs and other habitat areas must be analyzed in the DEIR as part of an Environmentally Superior alternative. Estate and ranchette designations (H2, R1, R2, and R5) rarely support agricultural uses and are the epitome of inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to “rural sprawl.”

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings³ and will avoid putting life and property at risk of wildfire. Los Angeles County should follow suit, and focus growth at higher densities in appropriate locations.

Transfer of development rights (TDR)

In order to protect the natural resource value of SEAs, Los Angeles County needs an effective strategy in addition to traditional acquisition and to the mechanisms (e.g., set asides, mitigation) in the SEA Ordinance. This is particularly the case in the Antelope Valley, where scattered estate and ranchette subdivision is the norm, rather than large development projects that can more effectively concentrate density and preserve open space through site design.

² The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement may justify an exception to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.

³ The San Diego County General Plan Update EIR found savings of \$1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see http://www.sdcountry.ca.gov/pds/docs/bos_may03_report.pdf at page 21, Public Costs, for comparison of municipal vs unincorporated service costs.

TDR is a proven mechanism to preserve open space and one that creates positive outcomes for property owners who sell development rights and those who acquire them. It gives economic value to the open space that the public desires. TDR may be of the classic variety⁴ or streamlined as a fee program. The latter would require payment of an open space fee as a condition of obtaining density and would allow the agency receiving the fees to effectively prioritize conservation properties. TDR should always use the post-Update, rezoned density as baseline for sending areas and should require participation by receiving sites not only to increase density above a baseline (bonus density) but also to attain plan density (at least beyond the lower end of the density range). Coordination with nearby cities would be ideal.

Because it shifts growth from more remote and habitat-rich lands to locations closer to jobs and services, TDR could be incorporated into the EIR as mitigation for impacts to biological resources, traffic, GHG, aesthetics, etc. We recommend retaining an experienced consultant to explore options and fashion a program.

Site design

In order to implement biologically sound site design during the land use process, the AVAP should “decouple” lot size from density. This allows development to be consolidated on smaller lots in the last sensitive portion of the site. To maintain community character in non-urban locations, a minimum lot size of ½-acre should be set, as it has in many rural San Diego communities.

Such consolidation of development should be *mandatory* at the Rural designations of RL5 - RL40, and should be used in the EIR as a key *mitigation measure* for biological, public safety, agricultural, and other impacts. The land set aside through such a subdivision could serve habitat or agricultural purposes but could not be developed in the future. An “off the shelf” model that provides standards, guidelines, and allowable uses (including agriculture) in the resulting open space is San Diego County’s Conservation Subdivision Program⁵.

Growth policies

Economic Opportunity Areas (EOAs) that concentrate jobs and housing and provide improvements in services and transportation and water and sewerage infrastructure are growth inducing. As a mitigation measure, it is thus essential that the AVAP include protections against the sprawl that would otherwise follow such development, particularly along highway corridors. The most worrisome case is Highway 138. EHL recommends an urban growth boundary around EOAs or at a minimum a land use policy that prohibits extension of urban services between the proposed West and Central EOAs absent another comprehensive update of the AVAP.

⁴ For example, see the City of Livermore’s program at <http://www.cityoflivermore.net/civicax/filebank/documents/3051/>.

⁵ See <http://www.sdcountry.ca.gov/pds/advance/conservationsubdivision.html>.

EHL looks forward to continuing to work with the County of Los Angeles on a successful Update.

Yours truly,



Dan Silver
Executive Director

Enclosure: Conservation Biology Institute, *Analysis of General Plan-2020 San Diego County*, December 2005



July 7, 2014

Connie Chung, AICP, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
Email: genplan@planning.lacounty.gov

RE: 2014 Draft General Plan 2035 and Draft Environmental Impact Report for the Los Angeles County General Plan Update (SCH#2011081042)

Dear Ms. Chung:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. For your reference, EHL is Southern California's only regional conservation group. We will focus on the environmental impacts of new development, and planning and mitigation strategies to reduce those impacts. General comments and recommendations will be provided first, followed by specific comments and recommendations.

GENERAL COMMENTS

EHL first wishes to voice its strong support for the expanded Significant Ecological Areas (SEAs) that are proposed¹. These are a foundation for the future of the County and are the repository of the citizens' natural heritage.

Next, EHL supports "smart growth" planning that reduces the land consumed for development, reduces GHG emissions, builds around transit corridors, and protects natural resources while accommodating population and job growth. But due to a long history of large lot parcelization in the County, the goal of environmental protection is challenging. And even where lands are rezoned to 1 unit per 20 acres, this will be insufficient to protect the most important biological values, that is, the SEAs. Such densities, on top of existing parcelization, create habitat fragmentation and edge effects incompatible with maintaining existing biological values. (See enclosure, documenting adverse impacts beginning roughly at 1:40.)

¹ When determining the compatibility of the proposed AVAP with an affected SEA, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which in effect clusters development on a larger scale, albeit with some of the resulting ecological benefit occurring on the other side of a jurisdictional boundary.

We therefore request that the General Plan 2035 and its EIR contain four measures to address the adverse impacts of development and to achieve the goal of resource protection. Where possible, these should be included in the General Plan and its EIR as feasible *mitigation measures* for the reduction of biological and other impacts, allowing for subsequent, expeditious tiering by future development during CEQA review.

Reduced densities in environmentally constrained land

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more remote locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs). These same areas typically are high fire hazard. Reducing density automatically puts less life and property at risk of fire and, during a fire event, ensures that limited fire-fighting resources are spent stopped the fire's spread rather than defending dispersed home sites that should not have been built in the first place. As noted below, the draft land use map does not sufficiently take into account fire hazard and should be improved.

Therefore, outside of urban centers and Economic Opportunity Areas, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category². *This is particularly vital within SEAs.* Estate and ranchette designations (H2, R1, R2, and R5) rarely support agricultural uses and are the epitome of unwise, inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to “rural sprawl.”

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings³ and will avoid putting life and property at risk of wildfire. Los Angeles County should follow suit, and instead focus growth at higher densities in appropriate locations. Recommendations regarding locations where the current draft land use map does not follow these principles will follow under specific comments.

Transfer of development rights (TDR)

In order to protect the natural resource value of SEAs, Los Angeles County needs an effective strategy in addition to traditional acquisition and to the mechanisms (e.g., set asides, mitigation) in the SEA Ordinance.

² The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement may justify an exception to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.

³ The San Diego County General Plan Update EIR found savings of \$1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see http://www.sdcounty.ca.gov/pds/docs/bos_may03_report.pdf at page 21, Public Costs, for comparison of municipal vs unincorporated service costs.

TDR is a proven mechanism to preserve open space and one that creates positive outcomes for property owners who sell development rights and those who acquire them. It gives economic value to the open space that the public desires. TDR may be of the classic variety⁴ or streamlined as a fee program. The latter would require payment of an open space fee as a condition of obtaining density and would allow the agency receiving the fees to effectively prioritize conservation properties. TDR should always use the post-Update, rezoned density as baseline for sending areas and should require participation by receiving sites not only to increase density above a baseline (bonus density) but also to attain plan density (at least beyond the lower end of the density range). Coordination with nearby cities would be ideal.

Because it shifts growth from more remote and habitat-rich areas to locations closer to jobs and services, TDR could be incorporated into the General Plan and its EIR as mitigation for impacts to biological resources, traffic, GHG, aesthetics, etc. We recommend retaining an experienced consultant to explore options and fashion a program, and that a work plan be advanced as soon as possible, so as to meet the target of implementation 1-2 years post Plan adoption.

Site design

In order to implement biologically sound site design during the land use process, the General Plan 2035 should “decouple” lot size from density. This allows development to be consolidated on smaller lots in the last sensitive portion of the site. To maintain community character in non-urban locations, a minimum lot size of ½-acre should be set, as it has in many rural San Diego communities. To obtain smaller lots via Density Controlled Development adds additional layers of time and money for project applicants, which discourages better planning and resource protection. Smaller lots should be available “by right” and routinely.

Such consolidation of development should be *mandatory* at the Rural designations of RL5 - RL40, and should be used in the EIR as a key *mitigation measure* for biological, public safety, agricultural, and other impacts. The land set aside through such a subdivision could serve habitat or agricultural purposes but could not be developed in the future. An “off the shelf” model that provides standards, guidelines, and allowable uses (including agriculture) in the resulting open space is San Diego County’s Conservation Subdivision Program⁵.

Growth policies

The County may designate Economic Opportunity Areas (EOAs) or other designations or overlays that concentrate jobs and housing and provide improvements in services and transportation and water and sewerage infrastructure. These are growth

⁴ For example, see the City of Livermore’s program at <<http://www.cityoflivermore.net/civicax/filebank/documents/3051/>>.

⁵ See <<http://www.sdcountry.ca.gov/pds/advance/conservationsubdivision.html>>.

inducing. As a mitigation measure, General Plan 2035 should include protections against the sprawl that would otherwise follow such development, particularly along highway corridors. The most worrisome case is Highway 138. EHL recommends an urban growth boundary around EOAs or at a minimum a land use policy that prohibits extension of urban services between the proposed West and Central EOAs absent another comprehensive update of the General Plan.

SPECIFIC COMMENTS

Land use maps

The Hazard, Environmental, and Resource Constraints Model and Map (Table C.1; Figure C.1) are good tools for assigning land use designations. Areas with constraints should receive the lower end of the density scale. *However, we recommend elevating Very High Fire Hazard Severity Zones to Class II.* In today's world, where the inevitability of wind-driven fire is recognized, it is wholly irresponsible to "dig the hole deeper" by approving more and more at-risk development. Along with the SEA designation, Very High Fire Hazard Severity Zones should result in RL40 (or RL20 or RL20 if existing parcelization predominates).

A review of the draft land use maps shows that several areas with SEA, other biological, or fire constraints have inappropriately high densities. These areas include West Chatsworth in the Santa Monica Mountains, around La Crescenta in the San Gabriel Mountains foothills, and Diamond Bar/Tonner Canyon in the Whittier-Chino-Puente Hills. These locations should be redesignated as RL40, or RL20 if existing parcelization precludes the lower category. It should be noted that parcel sizes in the Diamond Bar area are currently as large of 160 acres.

Site design

As noted, above, EHL recommends that minimum lot sizes in Rural and Estate categories be reduced to ½-acre. EHL recommends the following new Land Use Policy, modeled on a draft policy in Riverside County's GPA 960 update⁶.

In Very High Fire Hazard Zones and in locations where biological or agricultural resources are present, require consolidated development on lots smaller than the underlying land use designation would allow. The density yield of the underlying land use designation should be consolidated on one- half-acre lots; however, for sites located adjacent to existing, larger estate lots, 10,000 square foot minimum lots may be considered.

Draft goals and policies

⁶ See

http://planning.rctlma.org/Portals/0/genplan/general_plan_2014/GPA960/GPAVolume1/LandUseElement-%20GPA%20No%20960%20Volume%201%202014-02-20.pdf at page LU-56.

Conservation and Natural Resources Element

C/NR-1 SEA Preservation Program

EHL supports these mechanisms to achieve permanent protection of SEA resources, and urges quicker timelines and supporting work plan budgets.

C/NR-2 Mitigation Land Banking Program/Open Space Master Plan

EHL supports these mechanisms to achieve permanent protection of SEA resources while simultaneously streamlining development in less biologically important locations.

C/NR-4 Native Woodland Conservation Management Plan

EHL supports planning for the conservation of these important woodland communities but urges a 3-5 year timeline.

C/NR-5 Scenic Resources Ordinance

EHL supports preserving the scenic views that establish a sense of place.

Goals and Policies for Open Space Resources

EHL supports the proposed language for Goal C/NR 1 and Goal C/NR 2, and associated policies. *We note that all of this is predicated on securing expanded SEA boundaries.*

Goals and Policies for Biological Resources

EHL concurs with adding shrub habitats such as coastal sage scrub to the “including” list, as this community is very depleted yet still very biodiverse.

Policy C/NR 3.3 should not be limited to riparian resources, as upland communities are also badly in need of restoration. An example is returning non-native grassland to historic coastal sage scrub, which is an ongoing project in several Orange County locations.

Sensitive Site Design

Policy C/NR 3.8

We suggest that following improvement, as “discourage” is far too weak a word to comport with either CEQA or SEA policies.

~~Discourage~~ *Limit development in areas with identified significant biological resources, such as SEAs.*

Another option (from San Diego County's General Plan) is:

Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

Policy C/NR 3.9

This policy and its component parts are *strongly* supported as they provide the necessary General Plan basis for on-the-ground implementation of SEA goals. Absent this policy, SEA protection would remain abstract and ineffectual. We particularly support the additional elements for contiguity and connectivity, both on- and off-site.

Policy C/NR 3.10

We agree that at the General Plan level, it is wisest to express mitigation requirements in terms of general goals rather than, for example, as “in kind” or “flexible,” reserving more specific delineation to the SEA Ordinance or to County biological guidelines for CEQA implementation.

Policy C/NR 3.11

The weak term “discourage” in relation to riparian and wetland habitats would undermine CEQA, Calif. Dept. of Fish and Wildlife, and federal Clean Water Act standards and regulations. A much better option is found in San Diego County's General Plan Conservation and Open Space Element⁷:

Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

Minimize Impacts of Development. Require development projects to:

- *Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and*
- *Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.*

Woodland Preservation Policy C/NR 4.1

⁷ See <http://www.sdcounty.ca.gov/pds/gpupdate/docs/BOS_Aug2011/C.1-4_Conservation_and_Open_Space.pdf> at page 5-9.

We support this language and extending the policy to other native woodlands.

Land Use Element

Goal LU 3 Growth Management

Policy LU 3.1: Protect and conserve greenfield areas, natural resources, and SEAs.

EHL supports this policy.

Policy LU 3.2: Discourage development in areas with environmental resources and/or safety hazards.

Policy LU 3.3: Discourage development in greenfield areas where infrastructure and public services do not exist.

EHL concurs with the intent of these policies yet the term “discourage” is weak and ineffective. We suggest substitution of the term “limit” which is consistent with the SEA program.

Goal LU 4 Infill Development

EHL supports these policies.

LU-6 Transfer of Development Rights Program

EHL strongly supports this well-conceived policy and the work plan it outlines. We appreciate it being advanced to a Year 1-2 schedule and urge all appropriate budgeting.

LU-7 Adaptive Reuse Ordinance

As a vital and proven way to revitalize older communities, EHL support this item.

Safety Element

Goal S 2 Flood Hazards

Policy S 2.1: Discourage development in the County’s Flood Hazard Zones.

EHL concurs with the intent of this policy yet the term “discourage” is weak and ineffective. We suggest substitution of the term “limit.”

Goal S 3 Fire Hazard

Policy S 3.1: Discourage development in VHFHSZs, particularly in areas with significant biological resources.

Both the Safety and Land Use Elements should contain much stronger policies to reduce the life and property put at risk through ill-sited development. There is an enormous threat to public safety throughout the Very High Fire Hazard Zone and it is essential that decision-makers have an effective basis in the General Plan to limit development in these locations in response. It is not enough to improve site design and require defensible space. “Preventive medicine” on the land use planning front is needed, as well. Therefore, Policy S 3.1 should substitute the term “limit” for “discourage” to reflect the fact that we are living year-to-year in wildfire emergencies.

EHL also recommends the inclusion of a critically important new land use policy *to limit the expansion of the Wildland Urban Interface, or WUI*. The WUI is where homes are located near or among fire-prone lands. This interface is where wildfires ignite, where loss of life and property occurs, and where firefighters spend finite time and resources defending structures rather than stopping the spread of wind-driven fires. We recommend adding this Land Use policy to the appropriate section of that element:

Assign land uses and densities in a manner that minimizes development in Very High Fire Hazard Severity Zones.

Note that this policy is essential *verbatim* from San Diego County’s General Plan, adopted in 2011⁸. A discussion on the importance of reducing development intensity in Very High Fire Hazard Severity Zones should be added to the Land Use and Safety Elements to accompany this new policy.

Policy S 3.7: Consider siting and design for developments located within VHFHSZs, particularly in areas located near ridgelines and on hilltops, to reduce the wildfire risk.

EHL recommends strengthening this policy as follows. The question is whether Los Angeles County is serious about reducing fire hazard or merely wants to consider it.

Policy S 3.7: ~~Consider siting~~ Site and design for developments located within VHFHSZs, ~~particularly~~ such as in areas located near ridgelines and on hilltops, to reduce the wildfire risk.

In addition, the following policy should be added to the Safety Element to add another important dimension to the site design topic. Note that this is a modification of a draft policy in Riverside County’s current GPA 960 Update.

Require property owners to utilize consolidated site design within Very High Fire Hazard Severity Zones by siting development on a compact footprint.

Consolidated site design, as opposed to dispersed development, produces home sites easier to defend during a fire event and requires far less destruction of vegetation in order to produce defensible space.

⁸ See <<http://www.sdcounty.ca.gov/pds/gpupdate/docs/LUE.pdf>> at page 3-26.

EHL appreciates the progress being made in this historic General Plan 2035 update and looks forward to continuing to work with the Department of Regional Planning for successful protection of biological resources and sustainable patterns of land use.

Yours truly,

A rectangular box containing a handwritten signature in blue ink, which appears to read "Dan Silver".

Dan Silver
Executive Director

Enclosure: Conservation Biology Institute, *Analysis of General Plan-2020 San Diego County*, December 2005



Greater Antelope Valley Association of REALTORS®

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www.gavar.org

June 12, 2014



Los Angeles County Regional Planning Commission
320 West Temple Street, Room 1350
Los Angeles, CA 90012

Los Angeles County Planning Commission

RE: Comments to the Draft Significant Ecological Area (SEA) Ordinance and the Draft Hillside Management Ordinance

Madam Chairman and Commissioners,

The Greater Antelope Valley Association of REALTORS® is a local membership organization representing more than 1,500 REALTOR® and affiliate members. One of the primary charters of real estate professionals is the protection of private property rights. This is the basis for our response to the current draft SEA and HMA ordinances.

HMA Comments:

On behalf of our members, I will address several serious concerns with the proposed Hillside Management Areas (HMA) and Significant Ecological Areas (SEA) ordinances. We ask you not to approve these ordinances as currently proposed. With the current program to update the Antelope Valley Area Plan, we are anticipating a local EIR which will address many of the same concerns as the ordinances. We believe areas within the County which have local area wide plans and/or community standards districts should be exempt from these ordinances. For this reason it would be inappropriate to approve these ordinances prior to the adoption of the Antelope Valley Area Plan; approval of all previously submitted Community Standards Districts (CSD's) plans; and the inclusion/adoption of all proposed amendments to current CSD's which are currently filed with the Department of Regional Planning.

The proposed changes in the Hillside Management Areas Ordinance (HMA) along with the Hillside Design Guidelines have the ability to significantly curtail the potential use of and ability to develop land in the unincorporated area of Los Angeles County. This will present serious challenges for landowners as they proceed with any size development on their land, from building a single home to larger developments. It will also have far reaching economic ramifications to the county as it limits the creation of housing to meet the projected housing needs of the county in the foreseeable future.

Requirements in the proposed HMA ordinance are very likely to lead to an increase in the overall project area due to changes in how the percentage of open space is calculated. At least one model has shown the ordinance will increase the required project area by an average of 25%. This means projects must be larger than ever in order to meet preservation requirements. Increasing project area is a counterproductive by-

product of the proposed HMA ordinance. For this reason, we ask that you do not approve the proposed HMA Ordinance.

Los Angeles County is a very mountainous area and many developments, from single homes to multiple units fall under the HMA Ordinance countywide. As the current ordinance has been in place for many years, those who have purchased property on hillside areas have done so with valuations to the land calculated to address potential development in light of the current open space requirements. To increase these percentages arbitrarily is patently unfair to landowners as it has the potential to create a devaluation of their property and a corresponding loss of tax revenue for the County. The question has been asked "what is it about the current HMA ordinance that is not working?" This important question has yet to be answered by the County.

The arbitrary increase in open space requirements put forth in the ordinance will add cost to every project of any size, and leaves the landowner with limited options for his land. As the ordinance does not state the county will be purchasing this land from the landowner, we believe any increase in the overall requirements is not appropriate. We believe this ordinance is overreaching and should not be approved, and these issues should be addressed through locally adopted area plans. For this reason, we ask that you do not approve the proposed HMA Ordinance, and allow previously adopted ordinances, with their attendant policies already in place, be used in the design of appropriate projects.

SEA Comments:

Having reviewed the currently proposed Significant Ecological Area (SEA) Program, and the proposed SEA ordinance as provided on the County website. We have identified several serious issues of concern regarding the extensive expansion of the SEA's. Our foremost concern lies with the dramatic expansion of the SEA's from the currently designated **245,000** acres (approximate) to over **645,500** acres. This additional inclusion of over **400,000** acres constitutes *an increase of more than 163%* of land area which is being burdened with this designation and removes *over 1,000 square miles* of land from consideration for future development.

With the vast expansion of land under consideration for inclusion in SEA designated areas we would like to see the county provide current biological studies which support the actual need for inclusion of all of the property under consideration; the studies used in the development of the ordinance and boundary maps are more than 14 years old. We would like to make sure the boundaries proposed in the ordinance are based on actual "*ground-truth*" **science** rather than on "*scientifically-grounded concepts*."¹

While we all appreciate the need to preserve sensitive resources in our environment, we believe it is incumbent upon the County to prove the need for each and every acre being added to the SEA, based on actual science rather than concepts. Landowners should not be put in a position where they have excessive limits placed on their right to use the land in an appropriate manner, especially in the absence of sound scientific facts. For this reason we ask that you do not approve the proposed SEA Ordinance or its attendant boundary maps

Property owners whose land is under consideration for inclusion in the expanded SEA have not been notified, and will have very limited options for the use of their property under the proposed ordinance. Property owners will very likely be required to undergo large investments of both time and money to obtain permits through the SEA Conditional Use Permitting process if they wish to disturb their land for any reason. This includes additions to an existing home or adding outbuildings on land which is located within either a current or a newly designated SEA. We believe it is imperative for all property owners to receive

appropriate notification and be provided with the opportunity to respond, prior to consideration of the ordinance by the Planning Commission.

The proposed SEA ordinance prescribes preservation as the only strategy used in the retention of resources within the SEA. This is in stark contrast to measures currently utilized under CEQA which seek to assess the actual impact to resources on a property and to explore mitigation opportunities which may allow the property owner use of their property for some type of development. This proposal effectively deprives the property owner the opportunity to mitigate, restore or improve the biology found anywhere on his property to offset a disturbance to another area of the property. We encourage inclusion of mitigation, restoration and other measures to help protect resources, not relying solely on preservation as the only means of protection for the environment.

The ordinance further requires a high ratio, up to 4:1 for each acre disturbed, of property dedicated to open space as a condition to obtain a permit. For property owners of smaller lots, this is especially harmful when combined with required setbacks and other limiting factors to development. The acreage dedicated to the county must be recorded on the final site map and *may not* be used for any beneficial use to the landowner including habitat restoration to satisfy any CEQA requirements. We believe the dedication component of the ordinance is excessive and is unreasonably economically harmful to property owners.

As much of the land used in the expanded SEA's is for the purpose of connectivity, and possibly has no other biological or ecological reason for inclusion in an SEA, we believe the maps are vastly overreaching in their boundaries. Once the SEA designation is established for a property it will be virtually impossible for the designation to be removed by the property owner, even if it is possible to prove the absence of sensitive biologic resources on the property. There is no procedure by which acreage that does not contain sensitive resources can be removed or exempted from the SEA designation in the draft ordinance. We believe this to be a particular problem; mistakes are likely to be made despite the best intentions in the final process. There should be a procedure to remove a property which may have been mistakenly identified.

Currently, single family homes located within the adopted SEA are exempted from the SEA ordinance entirely. With passage of the ordinance as proposed, the development of each and every parcel, large or small will be required to be considered under the SEA ordinance. This will make it overly burdensome and expensive for an individual to develop even a single home on their land. This is an issue of great concern to us, and we believe the current policy is more appropriate than the policy found in the proposed ordinance. We encourage you to eliminate this provision and exempt small parcel developments from the SEA ordinance.

On May 27, 2014, representatives from the County's Department of Regional Planning (DRP) provided a presentation on the ongoing plan updates to members of the Antelope Valley Board of Trade and community members of the Antelope Valley. In the question and answer period following the presentation, many of the questions asked relating specifically to the proposed ordinances and the Antelope Valley Area Plan were not able to be answered by the representatives from the County's DRP. With more questions than answers, we strongly urge you to delay consideration of these ordinances until there is a more appropriate level of public notification, outreach and presentation of specifics regarding the ordinances. It is very frustrating to think that our questions couldn't be answered by staff, but the same staff is recommending passage of the ordinance. In the two week period following the presentation there has been no follow up with answers as specifically asked for, and promised. There should be no unanswered questions before ordinances of this magnitude are even considered for adoption.

We also believe it is critical that these ordinances not be considered prior to completion of the Antelope Valley Area Plan, and hereby request the time between now and the adoption of the Antelope Valley Area Plan be used to provide notification to individual property owners and stakeholders, and to conduct meaningful community outreach where answers are provided to specific questions, and residents are not simply referred to the county's overly cumbersome website for answers which are not easily found, if found at all.

Together with the proposed dramatic limitations on densities in the Antelope Valley Area Plan, these ordinances do more to limit the ability of the County to provide reasonable housing options for its citizens than they do to help meet the current and projected needs of residents. The Southern California Association of Governments (SCAG) has projected growth and housing needs numbers which will be difficult to meet if all of the proposed measures are adopted. While it is important to protect our environment, an appropriate balance between environmental protections and provisions for the housing needs of County residents must be found. Each plan and ordinance mentioned in this letter greatly limits future growth on its own. When the limitations to development in each measure are combined, the final result will be an overwhelming dearth of potential areas for the future development of affordable housing in the County. We believe it is highly inappropriate to consider either of these ordinances in advance of the adoption of the Antelope Valley Area Plan with its attendant Environmental Impact Report.

It is vital that the combined changes in land use density, intensity and designations be clearly communicated to all property owners so the combined ramifications and potential economic costs may be understood before any single plan or ordinance is adopted. The potential loss of economic value to everyone involved, including the county, is simply too great to be ignored.

In addition to addressing all other concerns above, we respectfully ask that these ordinances are not considered for adoption prior to the following conditions being met:

1. The EIR for the Antelope Valley Area Plan is approved
2. The Antelope Valley Area Plan is adopted
3. The science used in developing expanded boundaries be "ground-truthed" and verified for accuracy (not based on scientific concepts)
4. All questions by community members are appropriately answered
5. Hard Copy Maps showing the *combined* ramifications to land use from changes in the proposed Antelope Valley Area Plan, HMA and SEA Ordinances be prepared and presented to the public for comment and review through a series of outreach meetings. (Maps should be printed and available during the presentations, not just located on the county website).

Respectfully,



Rob Talbot, President

Cc: Supervisor Michael D. Antonovich



Palmdale Area Office
213 East Avenue M
Lancaster, CA 93535

Phone: 661.726.4447
Main Fax: 661.726.4460

www.graniteconstruction.com

June 11, 2014

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

sent via e-mail and US Mail

RE: Significant Ecological Areas update, requesting surface mining exemption

Dear Ms. Howard,

Thank you for meeting with Granite Construction Company (Granite) regarding the proposed SEA expansion areas. As discussed, the current draft ordinance will have significant impacts to our operations and general aggregate availability within Los Angeles County (County). We are concerned that, unless revised, the draft SEA Ordinance will discourage the production, investment, and development of local mineral resources, resulting in an increase in importation of aggregate materials from outside the County.

Encouraging locally sourced aggregate materials provides many economic and environmental benefits over imported materials:

- Reduced construction costs due to short haul distances,
- Reduced greenhouse gas emissions associated with trucking distances,
- Reduced road congestion associated with material hauling, and
- Reduced road pavement deterioration from heavy truck traffic.
- Increased local employment

Granite notes that, as stated in Public Resource Code Section 2711 (d-f), the State of California encourages locally sourced aggregate:

- (d) The Legislature further finds that the production and development of local mineral resources that help maintain a strong economy and that are necessary to build the state's infrastructure are vital to reducing transportation emissions that result from the distribution of hundreds of millions of tons of construction aggregates that are used annually in building and maintaining the state.*
- (e) The Legislature further finds and recognizes the need of the state to provide local governments, metropolitan planning organizations, and other relevant planning agencies with the information necessary to identify and protect mineral resources within general plans.*
- (f) The Legislature further finds that the state's mineral resources are vital, finite, and important natural resources and the responsible protection and development of these mineral resources is vital to a sustainable California.*

The Surface Mining and Reclamation Act of 1975 (SMARA) balances mine development with post mining reclamation resulting in minimal project impacts when reclamation is complete. Granite notes that the SEA Ordinance exempts uses which have supplemental regulations that balance development and preservation within the SEA areas.

Granite requests that the draft SEA Ordinance be revised to exempt SMARA compliant facilities, and future SMARA regulated projects.

Please feel free to contact me at (661) 387-7735 or william.taylor@gcinc.com to further discuss our request and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "BTaylor", with a long horizontal flourish extending to the right.

Bill Taylor
Resource Development Project Manager
Granite Construction Company

Justin G. Lane
42220 N. 10th St. West, Suite 101
Lancaster, Calif. 93534
(661)942-0435

June 17, 2014

Emma Howard, SEA Regional Planner
Communities Studies North Section
L.A. County Department of Regional Planning
320 Temple Street, Floor 13
Los Angeles, CA 90012
ehoward@planning.lacounty.gov

RE: SEA Current and Proposed Areas Effecting Assessor Parcel Numbers:

3036-008-042	3080-022-004	3080-023-001
3036-008-051	3080-022-005	3080-023-010
3036-008-039		

And surrounding areas

Dear Ms. Howard:

Upon review of the current and newly proposed SEA areas, we notice that there are areas being proposed that are of concern for the future of Los Angeles County.

The above referenced areas have potential use for quarry development and operations. Quarry operations in this area are important for future development in Los Angeles County. Having quarry operations in the local vicinity keeps building and development costs down while increasing economic growth for the county by keeping companies and businesses local.

We are making a formal request for these properties and surrounding areas that would be of potential quarry use to be removed from consideration for the new proposed SEA area.

We would appreciate a response and any further information on how we can protest the new proposed areas.

Sincerely,


Justin G. Lane

CC: Supervisor Michael Antonovich

From: [Emma Howard](#)
To: "Michael Hart"
Subject: RE: ESA
Date: Wednesday, June 18, 2014 6:13:00 PM

Thank you for your comment Michael. I will add you to our contact list so that you get updates about the SEA program and I am saving your comment for our comment file. I will let you know if I need further information. I appreciated the opportunity to speak with everyone at the meeting.

Regards,
Emma Howard

Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
<http://planning.lacounty.gov/sea>
Telephone: 213-974-6476

From: Michael Hart [mailto:myrealbeat@gmail.com]
Sent: Thursday, June 12, 2014 9:42 PM
To: Emma Howard
Cc: Sorin Alexanian
Subject: ESA

Hello Emma,

I am the person from Malibou Lake Mountain Club who asked the question about setbacks at the meeting in Triunfo Canyon last evening.

The required setback in the proposed ESA for lakes is definitely not compatible with Malibou Lake and would severely impact the sale and development of single family homes on the remaining lakefront sites and some sites near the lake.

If you need more clarification about Malibou Lake, Sorin Alexanian can explain our existence to you or just give me a call. I'd be more than happy to take you on a tour if you would like.

Thank you for the presentation.

Michael Hart
2090 East Lakeshore Drive
Agoura, CA 91301

818-575-9902 home
818-489-0151 cell
myrealbeat@gmail.com



Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR

June 13, 2014

Mr. Terry Norris
Precision Labs
644 East Rancho Vista Blvd.
Palmdale, CA 93550

Dear Mr. Norris:

Thank you for your recent correspondence.

By copy of this letter, I am asking that Mr. Richard Bruckner, Director of the Department of Regional Planning, look into your concerns and respond directly to you, with a copy of his response to my Antelope Valley office.

Again, thank you for writing.

Sincerely,

MICHAEL D. ANTONOVICH
Supervisor

MDA:nhd

c: Mr. Richard Bruckner ✓



Precision Labs
644 East Rancho Vista Blvd
Palmdale, Ca 93550
661-265-6500

June 12, 2014

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

RE: Changes to Significant Ecological Areas in the Antelope Valley Plan

Dear Ms. Howard,

Precision Labs, a small, native American owned business is opposed to the increases in the Significant Ecological Areas (SEAs) for the Antelope Valley Plan.

The planned changes will have overwhelming negative impact for the Antelope Valley and other areas. The negative impact can be easily predicted in economic and ecological terms. The negative impact is such that there can be no justified reasons for increasing the SEAs.

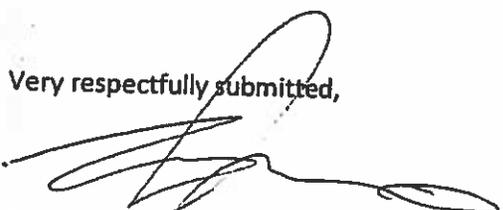
Economic impact can be easily seen in several aspects: area controlled from the growing aerospace community, growth limited by forcing import of raw aggregate, loss of jobs in the region, and sustainable energy sources limited in growth. By creating boundaries that prevent the unimpeded natural growth of aerospace industries and renewable energies, we would expect California to see the emerging space industry to continue its shift to Texas. This would be a technological loss that will have a trickledown effect that will be felt even to the lowest paid.

Aggregate is used in all aspects of construction yet it will be imported from non-ecologically mindful countries. By adding another layer of the plan with larger SEAs, aggregate is being planned as sourced from foreign countries that are not governed by items such as the 1971 Surface Mining and Reclamation Act. This would cause a negative impact that is greater than worst case scenarios for the local aggregate mining. Since Precision Labs supports all peoples, we must try to stop the irreversible ecological damage done to the countries from which they immigrate, especially since the mines here are restored after end of use and provide good jobs.

Ecological disasters arising from larger SEAs aside, the import of Mexican aggregate could further aggravate the plight of Mexican citizens held hostage to violent gangs. The New York Times covered this earlier this year with the story "Mexico targets gang that infiltrated the mining industry."

As a world leader, we cannot conscientiously designate larger SEAs with disregard to all humanity. The larger SEAs would also have a significant negative economic impact as well.

Very respectfully submitted,



Terry Norris
Chief Executive Officer

SUNSHINE CANYON LANDFILL

May 22, 2014

Commissioner Esther L. Valadez, Chair
Commissioner David W. Louie
Commissioner Laura Shell, Vice Chair
Commissioner Curt Pedersen
Commissioner Pat Modugno
Los Angeles County
Department of Regional Planning
320 W. Temple Street, Room 1354
Los Angeles, CA 90012

Subject: COMMENTS ON PROPOSED SIGNIFICANT ECOLOGICAL AREA (SEA)
ORDINANCE CHANGE, GENERAL PLAN 2035

Dear Commissioners,

As owner and operator of Sunshine Canyon Landfill, Republic Services (Browning-Ferris Industries of California, Inc.), wishes to inform the Regional Planning Commission of the potential impacts of the above-referenced proposed ordinance and accompanying SEA map changes on the Landfill and related developments.

Based on these impacts, which we discuss in detail below and in the attached Exhibits, we respectfully request that proposed changes in the boundaries of the Santa Susana Mountains and Simi Hills SEA ("the SEA") adjacent to Sunshine Canyon Landfill, be eliminated and that the existing boundaries of the SEA be maintained.

Our concerns with respect to draft boundary changes as shown in the SEA map contained in the County map database "GIS-NET3", are based on their potential impacts on:

- Approved grading limits for the landfill;
- Approved waste limits for the landfill;
- Approved plans for permanent and temporary grading plans, access roads and construction of Southern California Edison (SCE) transmission lines that are critical for development of the approved landfill; and
- Planned future development in a portion of the permitted landfill limits that has been deferred pending a revision of current grading limits to remove existing landslides.

Exhibits 1 through 4 illustrate these concerns, as discussed below.

Exhibit 1 - This exhibit shows the existing grading limits approved by the County for the side of the landfill north of the City/County Line. It also shows the existing and proposed boundaries of the SEA, and identifies areas where proposed SEA boundaries impinge on the approved landfill grading limits. If implemented, this change could potentially complicate completion of required and approved drainage structures as well as completion of the approved landfill liner system, and impact the site's disposal capacity and life.

Exhibit 2- This exhibit shows the approved limits of waste and the existing and proposed SEA boundaries. The area impacted by the proposed SEA boundary change contains portions of the approved waste footprint in both the City and County sides of the landfill.

Exhibit 3 - This exhibit presents plans approved by the California Public Utility Commission (CPUC) for re-routing of transmission lines of Southern California Edison (SCE) that currently cross the center of the landfill. These transmission lines must be rerouted in order to allow the site to be developed to its approved final capacity under entitlements issued jointly by the City of Los Angeles and County of Los Angeles. It shows potential conflicts with the proposed SEA boundary revision in several areas:

- The new boundary on the ridgeline east of the landfill coincides with an existing access road needed to maintain existing and proposed power lines on that side of the site; and,
- Some approved poles and access roads on the west side of the landfill fall within the proposed SEA boundary.

Exhibit 4 - This exhibit shows an area in the northwest corner of the Sunshine Canyon property. It highlights two major features of the site:

- An area of approximately 11.8 acres in the extreme northwest end of the approved landfill waste limits that was temporarily filled with soil as a buttress against adjacent landslide areas; and
- Documented landslides that would need to be removed by excavation and grading prior to removing the temporary soil fill and developing the site to its full permitted size and capacity. The landslides were known and taken into account in prior environmental documentation based on their identification in original site characterization geologic studies (Purcell, Rhodes & Associates, Site Geologic Map, May 27, 1988).

Removal of these landslides would require an adjustment in the existing grading limits shown in Exhibit 1. Such an adjustment would be subject to review and approval by the County under terms of the existing CUP, Condition 37, which requires prior approval by the Department of Public Works "for all grading within the County's jurisdiction that is outside the Landfill footprint." If the area is incorporated into the SEA as proposed, the County review process prescribed by the CUP could be superseded by Section 22.52.2915.E of the proposed ordinance as a "modification to any development previously authorized by a valid.Conditional Use Permit....." and thereby become subject to development standards of the SEA ordinance. We believe this change in County review procedures for the landfill is unnecessary and would impose a needless burden on both the Landfill and the County.

Given the proposed extension of the SEA map boundaries to include more property owned by the Sunshine Canyon Landfill (Browning-Ferris Industries of California, Inc.), we are very concerned with the language in the Ordinance (Section 22.52.2910 A) that states the Ordinance applies to the entirety of any lot or parcel, even if only a small fraction of that lot or parcel falls

with the revised SEA map area. Further, the exemption for property covered by existing land use permits is restricted to the lifetime of those permits and, moreover, the implication that any future land use approvals would be covered by the Ordinance creates many additional questions. What exactly is meant by the phrase "land use approval"-- as distinct from a land use permit? If an approval is required under a condition of an existing CUP, is that approval considered a "land use approval," which in turn will trigger application of the Ordinance? Can you give us a complete list of "land use approvals" that would be covered by the ordinance, and those that would not be covered?

The impact of requiring SEA Ordinance clearance of approvals for the currently- permitted build-out of the Landfill could prevent or substantially delay that build-out. The Landfill services a vital public interest for the County, the City of Los Angeles, including its residents and businesses. It could also hinder vitally important actions needed to correct safety concerns, such as existing or newly discovered landslides, or hinder access to power lines or critical landfill environmental control systems.

Any such preclusion or delay of the build-out of the Landfill under its current permits, which underwent extensive review under CEQA before these land use permits were obtained, should itself be subject to further robust CEQA review. These potential environmental impacts of implementation of the Ordinance would include, but not be limited to, the impacts on public services; interference with the transmission of electricity to surrounding areas; interference with the proposed and approved co-generation facility at the Landfill, which will greatly reduce the creation of greenhouse gases by producing significant quantities of renewal electric energy from landfill gas; safety impacts if the landfill is unable to take correction actions to remedy landslides; environmental impacts if the Landfill cannot take corrective action required by a regulatory agency with jurisdiction over the Landfill; closure and post-closure of the Landfill; and other activities that produce environmental benefits.

We can elaborate on the foregoing environmental concerns that should be addressed in an environmental document to support adoption of the Ordinance, but prior to doing so we request that the draft SEA map boundary simply be revised to not include additional Sunshine Canyon Landfill property, and that the existing SEA boundaries be maintained.

Sincerely,

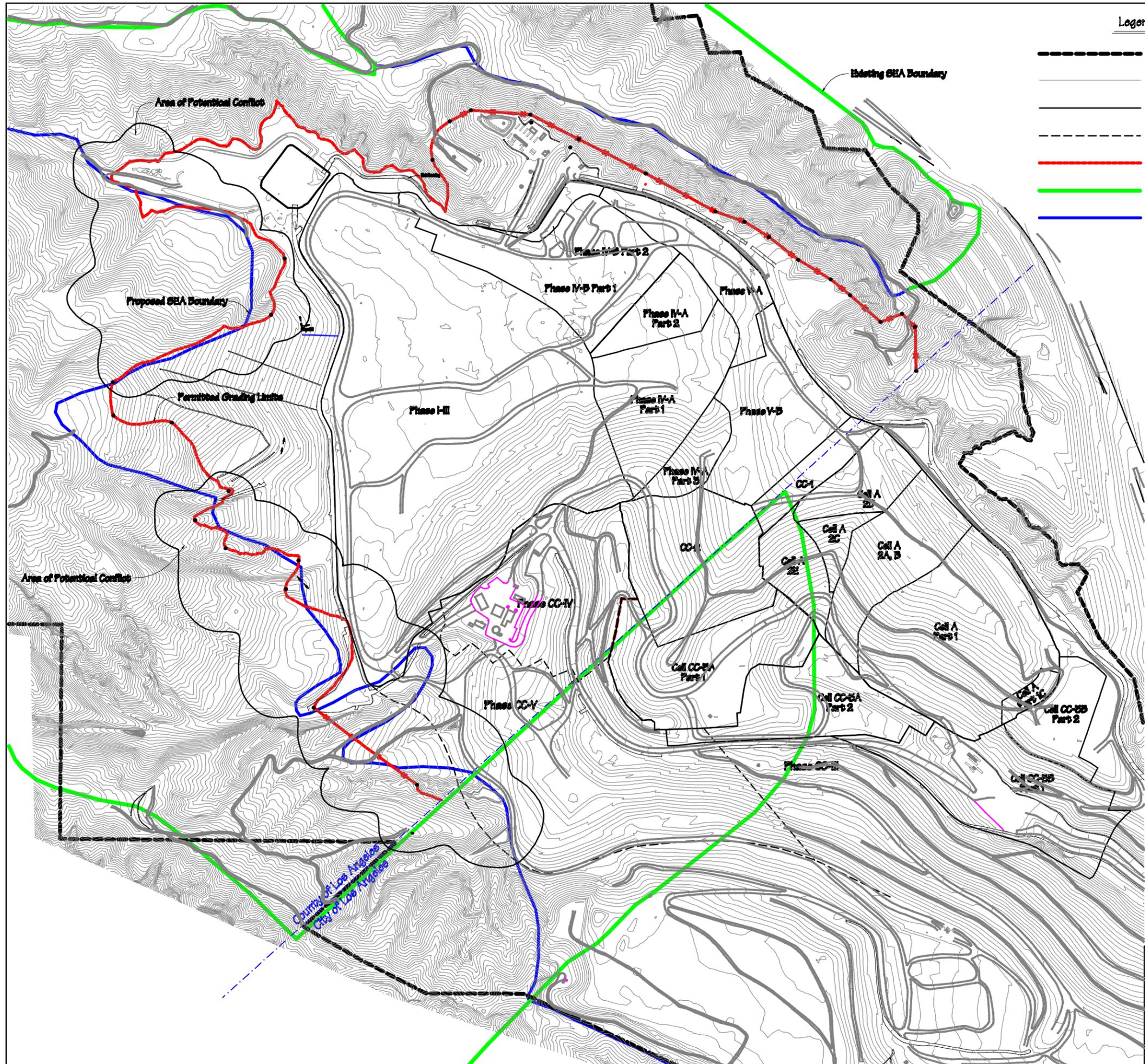


Rob Sherman
General Manager
Sunshine Canyon Landfill

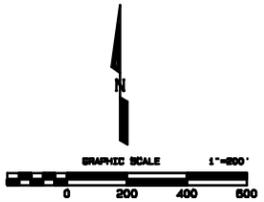
Cc: Mr. Tom Bruen, Esq.
Mr. Michael Stewart, Republic Services
Mr. Harold Barber, Republic Services
Mr. Ron Krall, Republic Services

Attachments

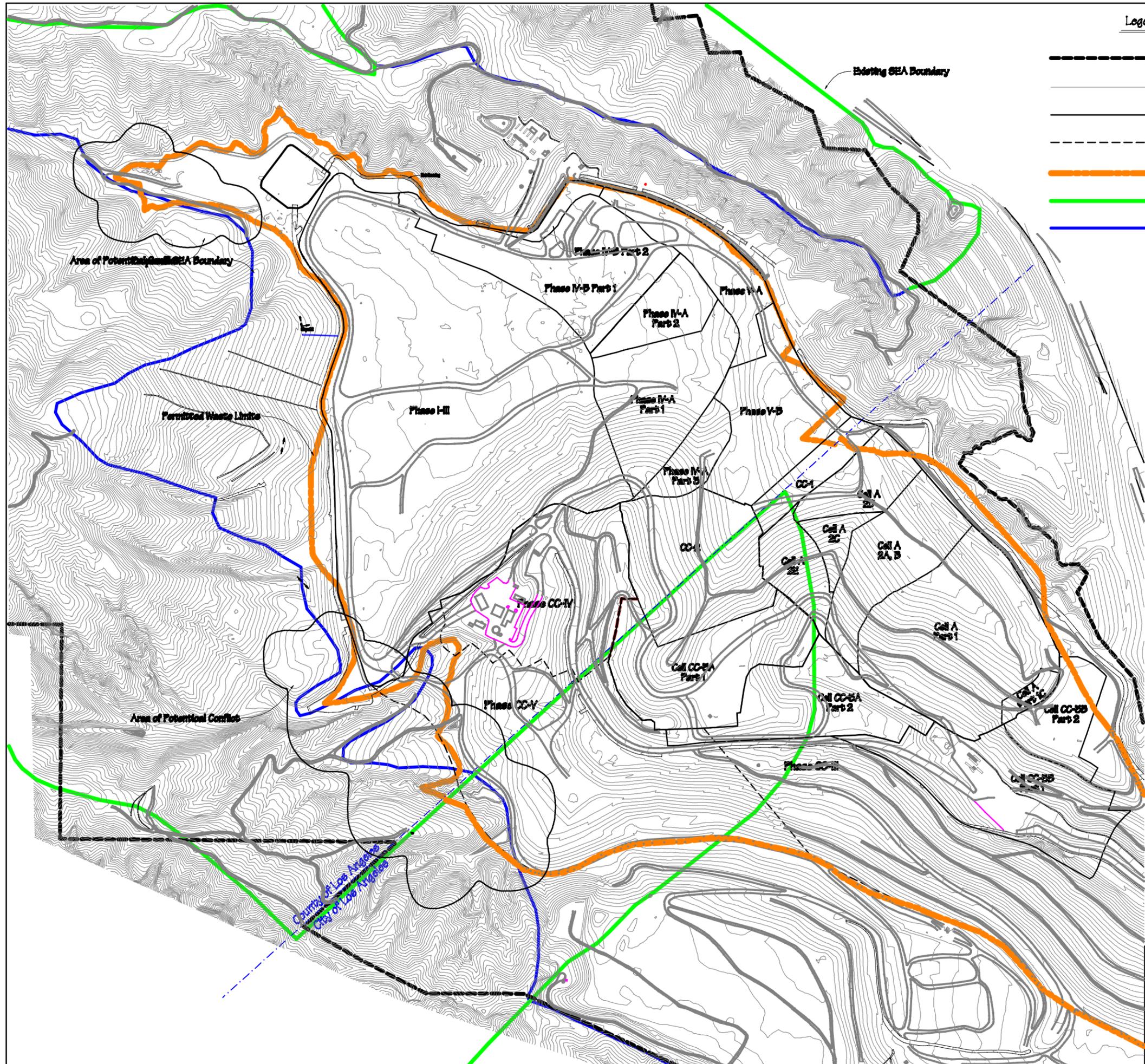
Sunshine Canyon Landfill
14747 San Fernando Road, Sylmar, CA 91342
Phone 818-362-2124 Fax: 818-362-5484



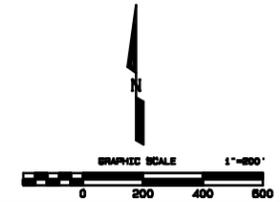
- Legend:**
- Property Boundary
 - Existing Topography As of 3/12/14
 - Existing Liners
 - Future Phases CC-III, CC-IV and CC-V
 - Approved Grading Limits
 - Existing SEA Boundary
 - Proposed SEA Boundary



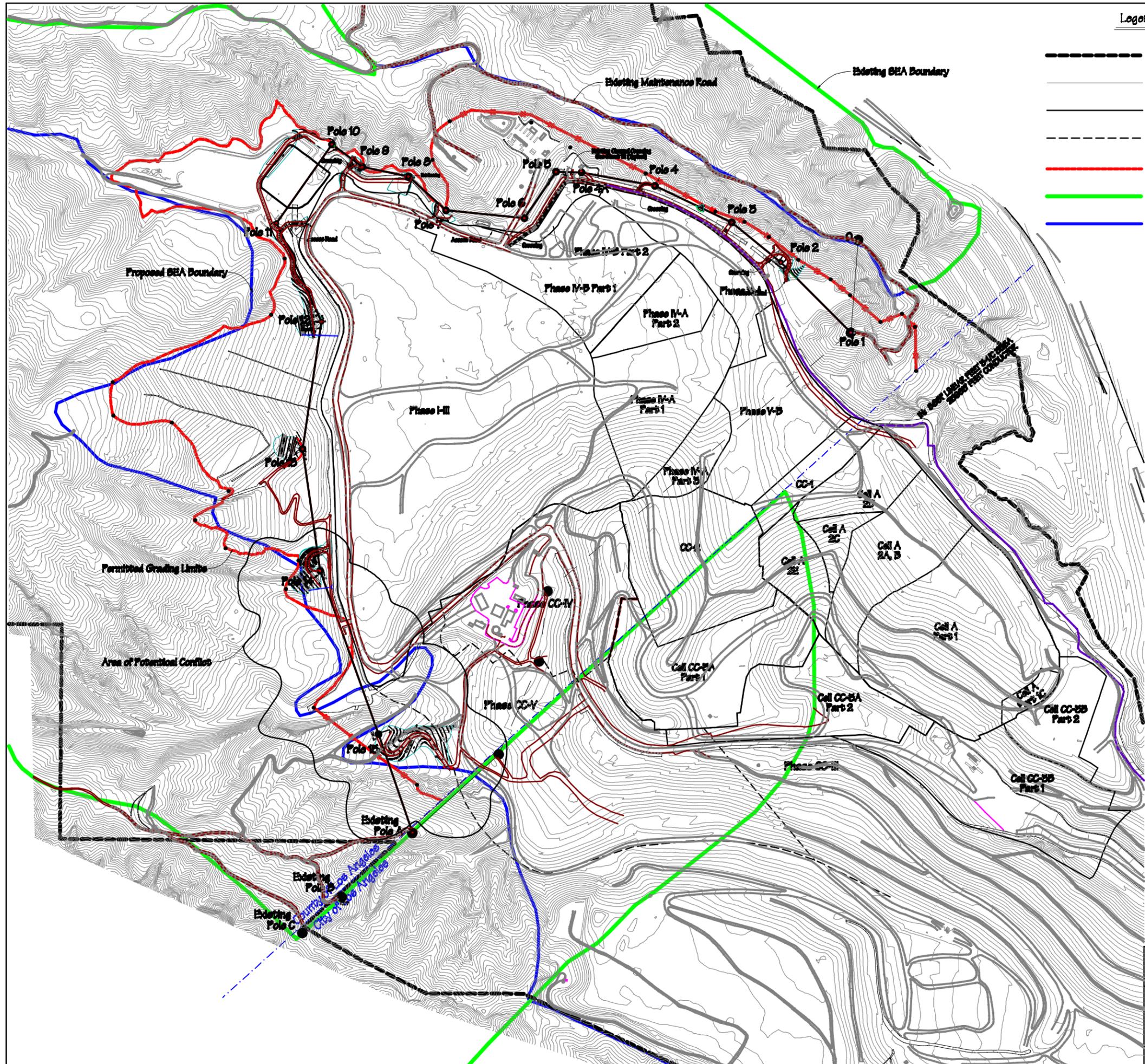
A-MEHR, INC.	
2808 Mill Creek Drive, Laguna Hills California 92653 (949) 838-0877	PROJECT NO: 14-0014
Sunshine Canyon County Extension Landfill	DATE: 5/6/14
Approved Grading Limits	FIGURE: 1
Topography Grades as of 3/12/14	



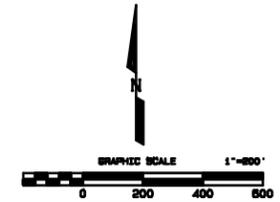
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 - Approved Waste Limits
 - Existing SEA Boundary
 - Proposed SEA Boundary



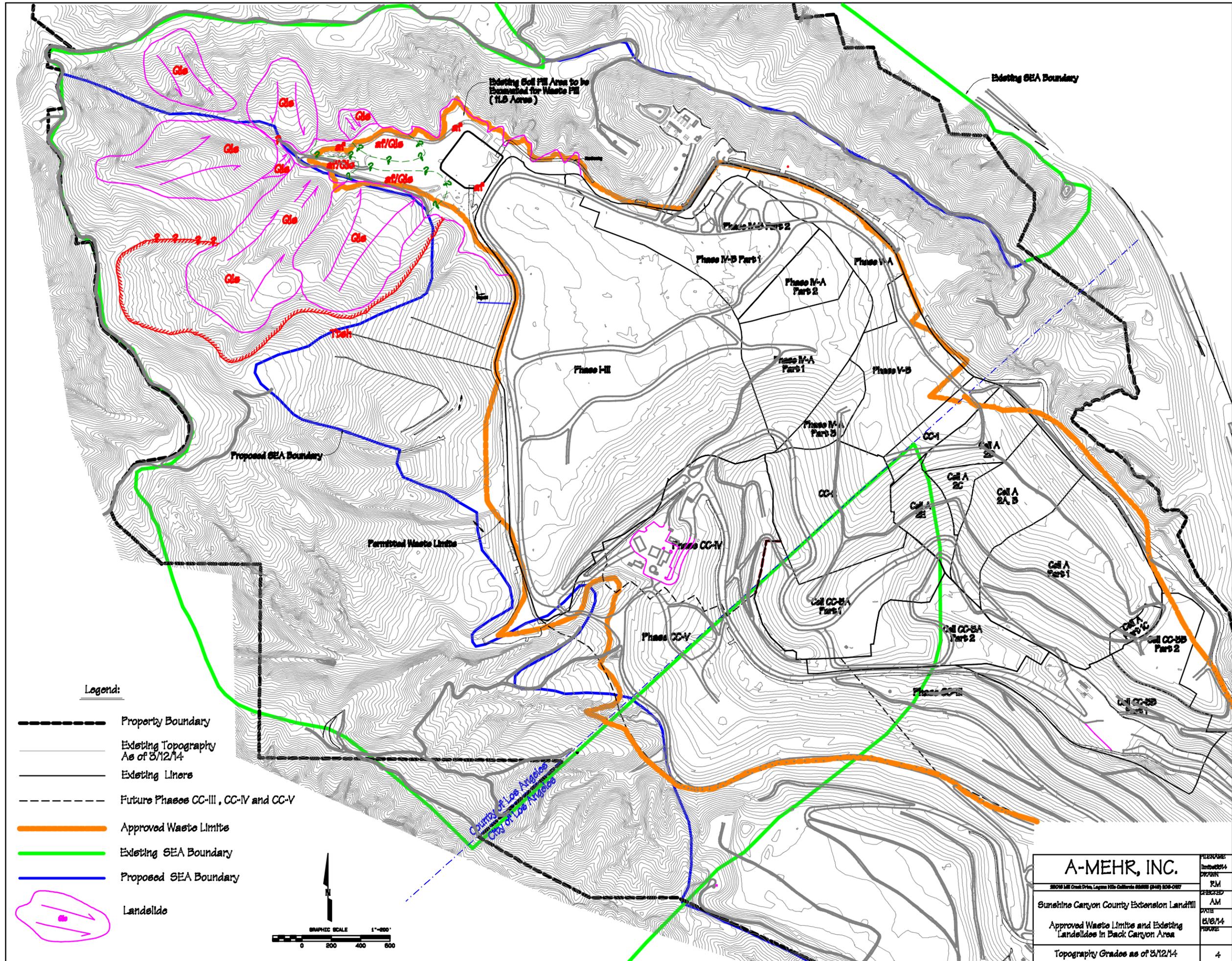
A-MEHR, INC.		FILED/DATE
2804 Mill Creek Drive, Laguna Hills California 92653 (949) 838-0877		05/06/14
Sunshine Canyon County Extension Landfill		PROJECT
Approved Waste Limits		AM
Topography Grades as of 5/12/14		DATE
		5/6/14
		FIGURE
		2



- Legend:**
- Property Boundary
 - Existing Topography As of 3/12/14
 - Existing Liners
 - Future Phases CC-III, CC-IV and CC-V
 - Approved Grading Limits
 - Existing SEA Boundary
 - Proposed SEA Boundary

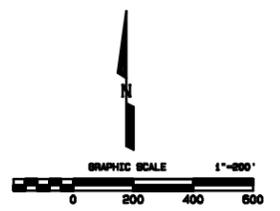


A-MEHR, INC.		FILED/DATE
2808 Mill Creek Drive, Laguna Hills California 92653 (949) 838-0877		05/06/14
Sunshine Canyon County Extension Landfill		RM
Approved Edison Transmission Lines and Access Roads		AM
Topography Grades as of 3/12/14		05/06/14
		FIGURE
		5



Legend:

-  Property Boundary
-  Existing Topography As of 3/12/14
-  Existing Liners
-  Future Phases CC-III, CC-IV and CC-V
-  Approved Waste Limits
-  Existing SEA Boundary
-  Proposed SEA Boundary
-  Landlide



A-MEHR, INC.		FILED/REV
2804 Mill Creek Drive, Laguna Hills California 92653 (949) 208-0177		DATE/REV
Sunshine Canyon County Extension Landfill		RM
Approved Waste Limits and Existing Landlides in Back Canyon Area		AM
Topography Grades as of 3/12/14		5/6/14
		FIGURE
		4

SESPE

CONSULTING, INC.

468 Poli Street, Suite 2E • Ventura, CA 93001
Office (805) 275-1515 • Fax (805) 667-8104

June 19, 2014

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

RE: Boundary Change Request for SEA Draft 5, Big Rock Creek Area

Dear Ms. Howard,

On Behalf of The California Construction and Industrial Materials Association (CalCIMA), a statewide trade association representing construction aggregate, ready-mix concrete and industrial materials producers in California, Sespe Consulting, Inc. is pleased to present the following request for a boundary adjustment to the proposed SEA Draft #5. Attached to this letter is a figure that illustrates the proposed boundary changes and figures from a hydrology report prepared for a mine in that area.

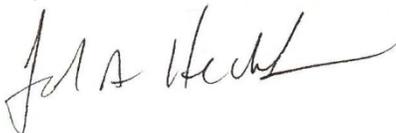
The boundary request is being made on the following basis:

1. The areas that we are asking to be removed from the proposed SEA have been Classified as MRZ-2 and designated as Regionally Significant Aggregate Resource Areas by the State Mining and Geology Board in 1987. This process formally recognized significant deposits that could provide for future needs and was conducted in full compliance with CEQA. We believe that the proposed SEAs are in conflict with this designation and the Mineral Resource Protection Policies in the proposed 2014 Los Angeles County General Plan, Policy C/NR 10.1 which states "Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses". An SEA can be considered an incompatible use to mineral extraction.
2. Cal Trans has recently made significant improvements to Highway 138 that crosses the existing Regionally Significant Aggregate Resource Areas E-5, E-4, E-3, E-2, and E-1 of the Big Rock Creek Fan. The result of these improvements is that surface flow of storm water runoff has been permanently and significantly reduced and is no longer alluvial in nature. This warrants removal of this area from consideration as an SEA. Attached are figures from a Hydrology Study from Stetson Engineers that illustrate the changes in flow in this area. The full study can be found in Appendix 3 of the EIR that is available online at:

http://planning.lacounty.gov/assets/upl/case/project_r2007-00670_deir-appendices.pdf

Please consider our request and feel free to contact me at 805-275-1515 if you have any questions or require additional information.

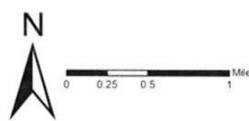
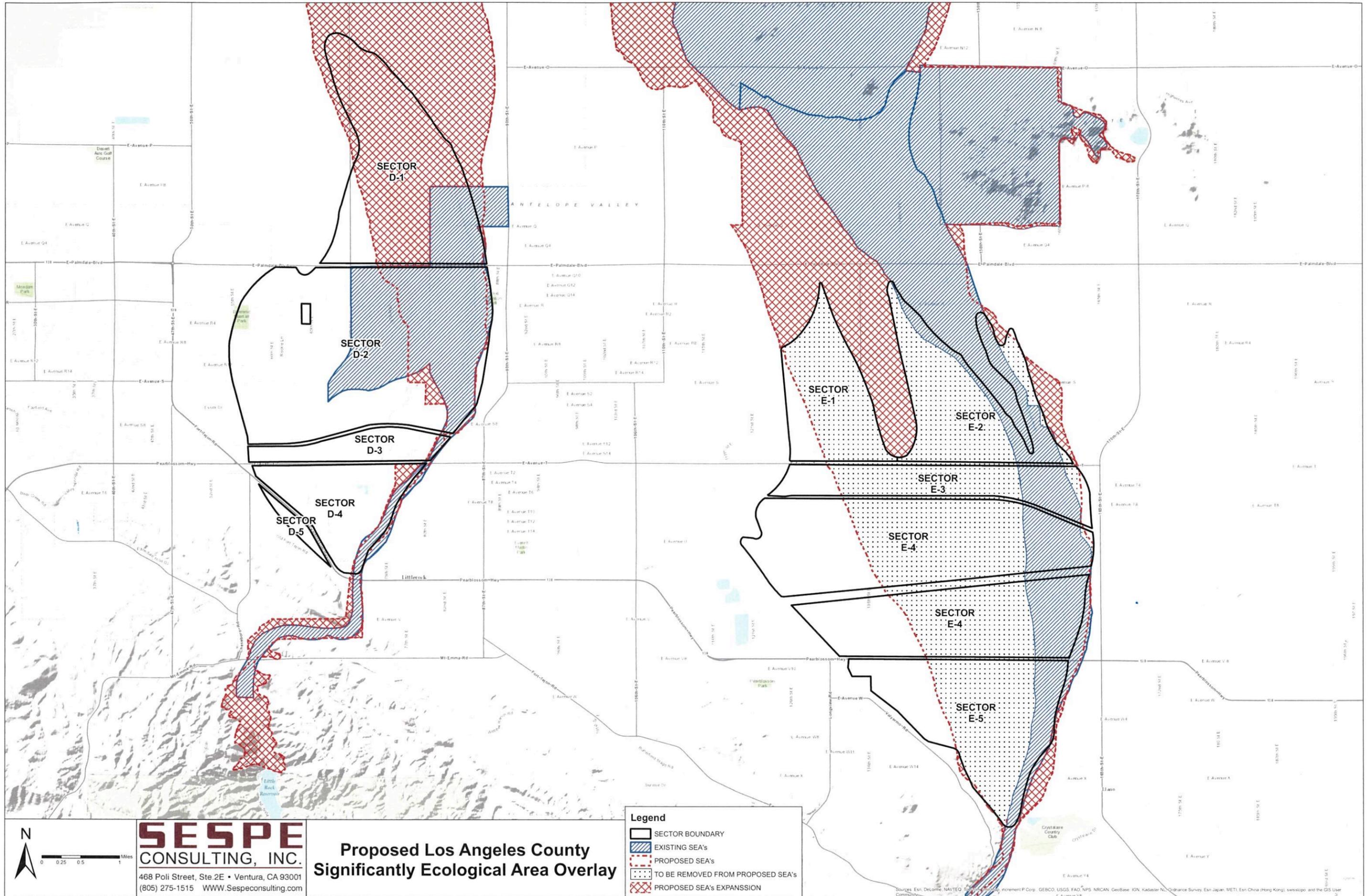
Regards,



John A. Hecht, P.E.
President
Sespe Consulting, Inc.

Attachments:

1. Figure 1 Deletions from Proposed SEA Draft 5
2. Stetson Engineers Figures 3b, Existing and Pre Cal Trans



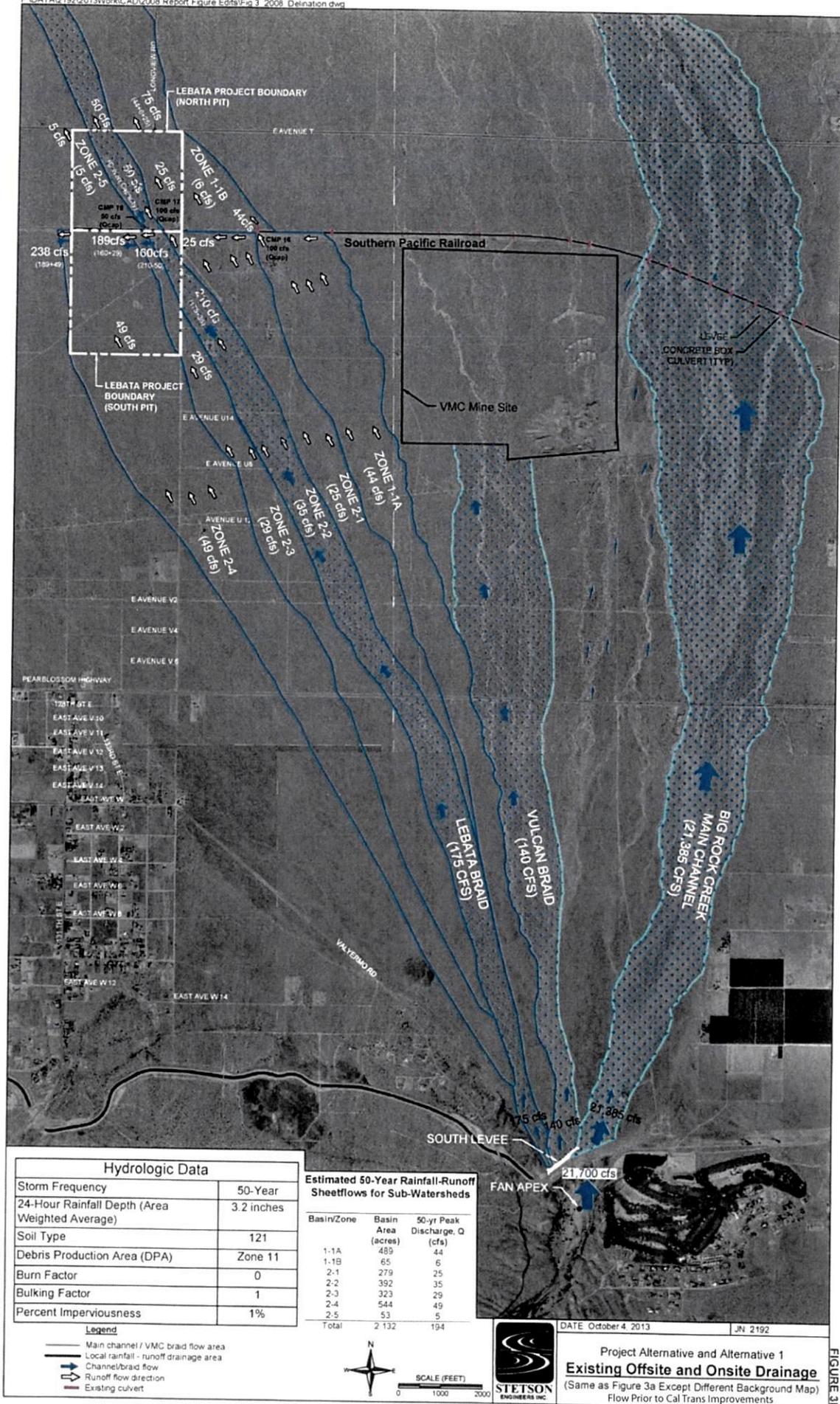
SESPE
CONSULTING, INC.
 468 Poli Street, Ste. 2E • Ventura, CA 93001
 (805) 275-1515 WWW.Sespeconsulting.com

**Proposed Los Angeles County
 Significantly Ecological Area Overlay**

Legend

- SECTOR BOUNDARY
- EXISTING SEA's
- PROPOSED SEA's
- TO BE REMOVED FROM PROPOSED SEA's
- PROPOSED SEA's EXPANSION

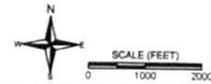
Sources: Esri, DeLorme, NAVTEQ, Swisstopo, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo and the GIS User Community



Hydrologic Data	
Storm Frequency	50-Year
24-Hour Rainfall Depth (Area Weighted Average)	3.2 inches
Soil Type	121
Debris Production Area (DPA)	Zone 11
Burn Factor	0
Bulking Factor	1
Percent Imperviousness	1%

Estimated 50-Year Rainfall-Runoff Sheetflows for Sub-Watersheds		
Basin/Zone	Basin Area (acres)	50-yr Peak Discharge, Q (cfs)
1-1A	489	44
1-1B	65	6
2-1	279	25
2-2	392	35
2-3	323	29
2-4	544	49
2-5	53	5
Total	2,132	194

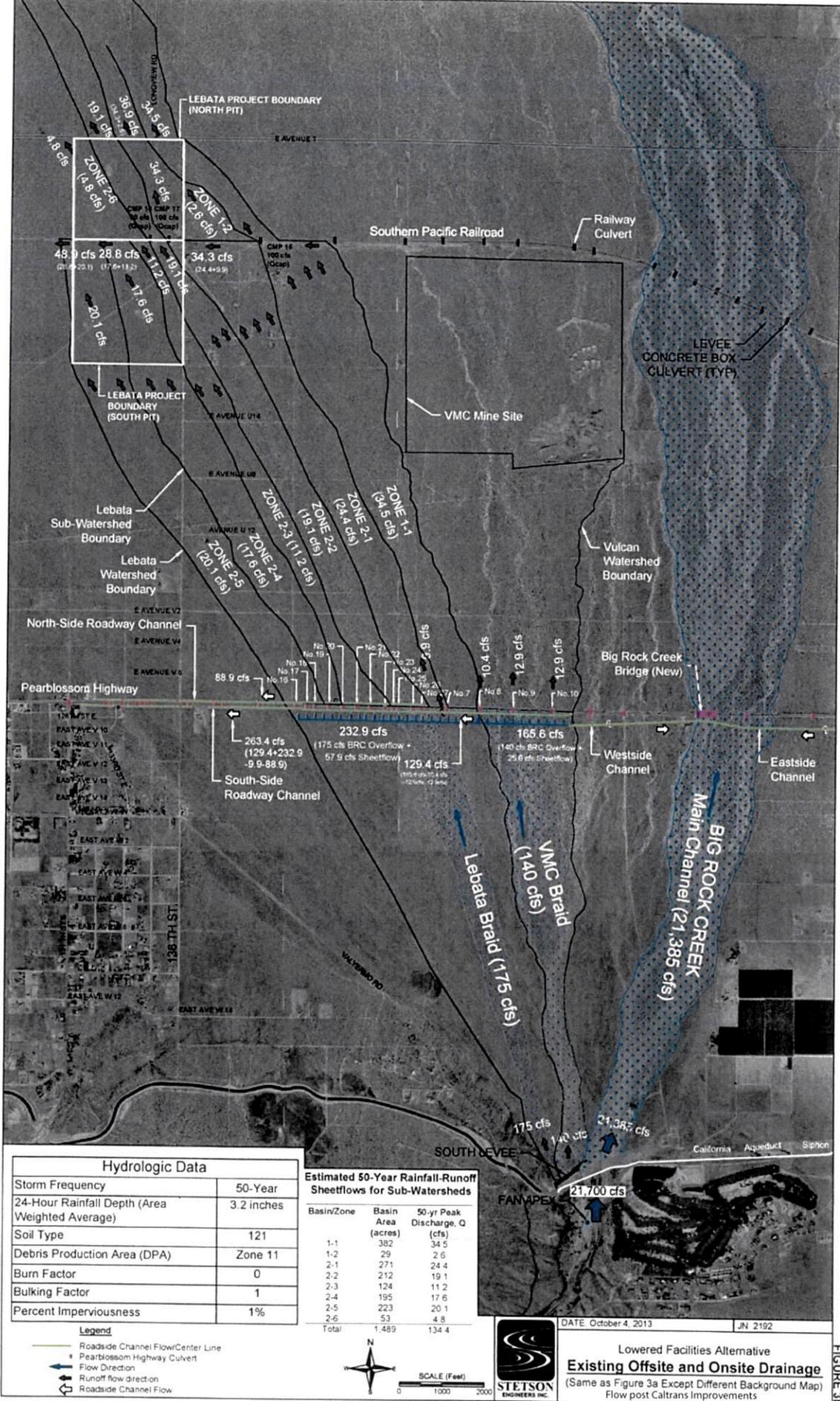
- Legend**
- Main channel / VMC braid flow area
 - Local rainfall - runoff drainage area
 - Channel/braid flow
 - Runoff flow direction
 - Existing culvert



DATE October 4, 2013 JN 2192

Project Alternative and Alternative 1 Existing Offsite and Onsite Drainage
 (Same as Figure 3a Except Different Background Map)
 Flow Prior to Cal Trans Improvements

FIGURE 3b



Hydrologic Data	
Storm Frequency	50-Year
24-Hour Rainfall Depth (Area Weighted Average)	3.2 inches
Soil Type	121
Debris Production Area (DPA)	Zone 11
Burn Factor	0
Bulking Factor	1
Percent Imperviousness	1%

Estimated 50-Year Rainfall-Runoff Sheetflows for Sub-Watersheds		
Basin/Zone	Basin Area (acres)	50-yr Peak Discharge, Q (cfs)
1-1	382	34.5
1-2	29	2.6
2-1	271	24.4
2-2	212	19.1
2-3	124	11.2
2-4	195	17.6
2-5	223	20.1
2-6	53	4.8
Total	1,489	134.4

- Legend**
- Roadside Channel Flow/Center Line
 - Pearl Blossom Highway Culvert
 - Flow Direction
 - ↘ Runoff flow direction
 - ↻ Roadside Channel Flow



DATE: October 4, 2013 JN 2192

Lowered Facilities Alternative
Existing Offsite and Onsite Drainage
 (Same as Figure 3a Except Different Background Map)
 Flow post Caltrans Improvements

FIGURE 3b

From: [Klecha, Anthony](#)
To: [Emma Howard](#); [Susan Tae](#)
Cc: [La Fevers, Glenn](#); [Lindgreen, Erik](#); [Munsey, Joseph](#); [Meza, David](#)
Subject: Proposed SEA Designation at SoCalGas" Aliso Canyon Storage Field
Date: Wednesday, May 21, 2014 4:14:40 PM
Attachments: [Aliso Canyon Figure 1.pdf](#)
[Aliso Canyon Figure 2.pdf](#)
Importance: High

Hi Emma & Susan,

Thank you again for taking the time this morning to meet with us to discuss the proposed SEA. It's an important issue for us and we appreciate your time and feedback. We understand that the proposed SEA boundaries will be presented to the Regional Planning Commission on June 25.

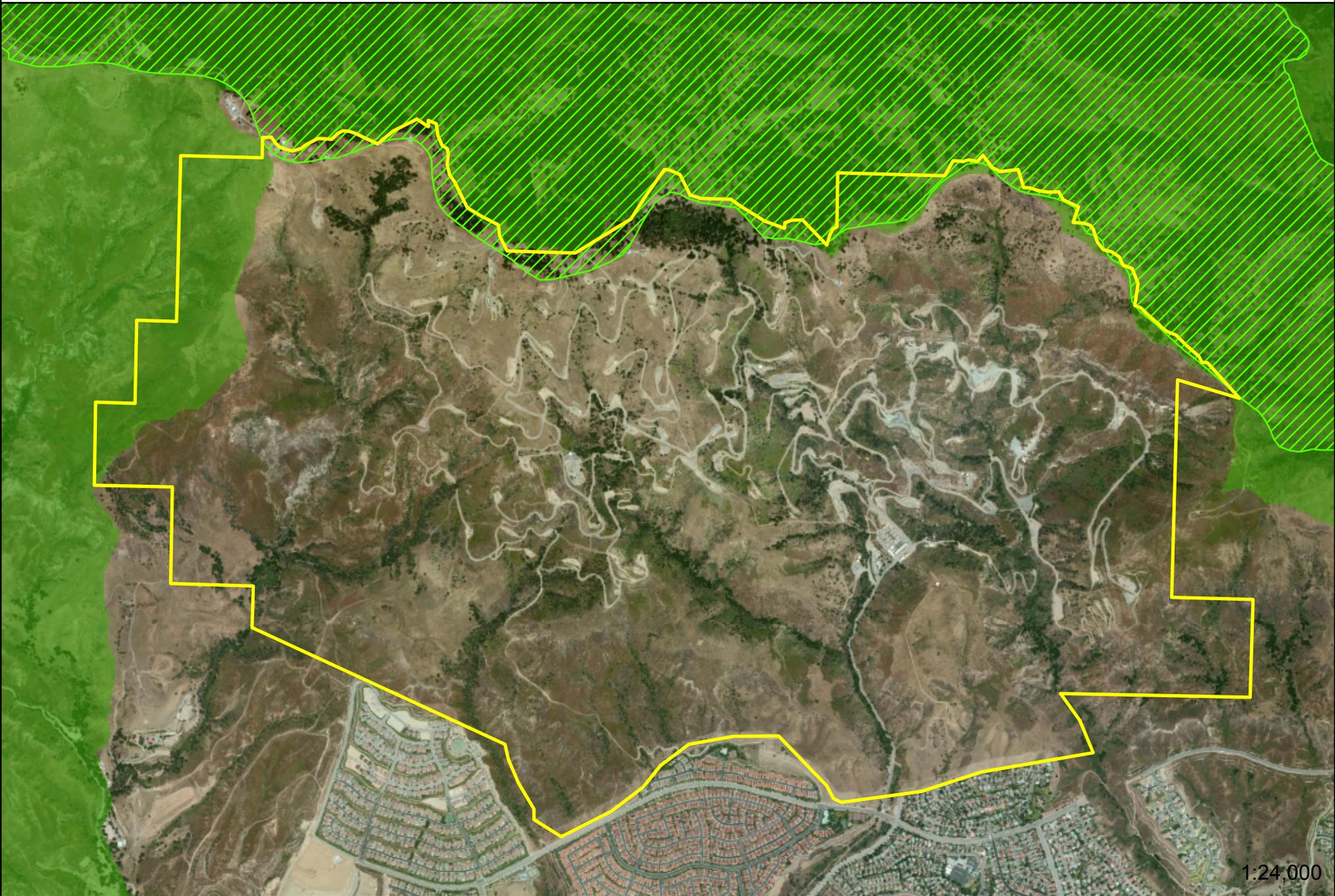
Restating what we conveyed during the meeting, it is critical that SoCalGas maintain its ability to operate, repair, upgrade, and expand, where necessary, our facilities within our property boundary (depicted as the yellow line on Figure 1). SoCalGas delivers safe, reliable natural gas to 20.9 million consumers throughout Central and Southern California, and it's vital that this service be maintained under safe and secure conditions. Should the SEA be approved as proposed, not only might SoCalGas experience unnecessary delays and added or duplicative restrictions associated with new SEA rules, but we may encounter a substantial increase in trespassers onsite. In our experience, SEAs and similar public designations on private property, especially in "perceived" undeveloped areas, have a tendency to encourage hikers and bikers, and other trespassers, which in-turn, can create hazardous conditions onsite. Excluding the facility property now from the proposed SEA designation would alleviate or minimize these concerns. Also important, but not as critical as the facility property boundary, would be for the County to expand the excluded area to include SoCalGas' recent mineral and storage rights acquisitions along the western boundary (depicted as the hatched lines in Figure 2) as this area may undergo certain natural gas developments in the near future.

Furthermore, please be mindful that new land use designations over our Aliso Canyon facility may not be relevant in any event to the extent the SEA conflicts with applicable state laws and regulations, including the California Public Utilities Commission, which has general oversight over public utilities like SoCalGas.

Thank you for your consideration of this matter and please do not hesitate to contact me if you have any questions or need additional information.

-Tony

Anthony A. Klecha
Principal Environmental Specialist
Southern California Gas Co.
Office: (213) 244-4339
Cell: (213) 393-0568
aklecha@semprautilities.com

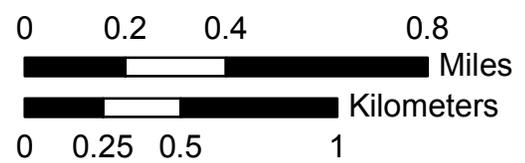


1:24,000

Aliso Canyon Storage Field

Legend

-  Active Storage Field Boundary
-  Current Significant Ecological Area
-  Proposed Significant Ecological Area



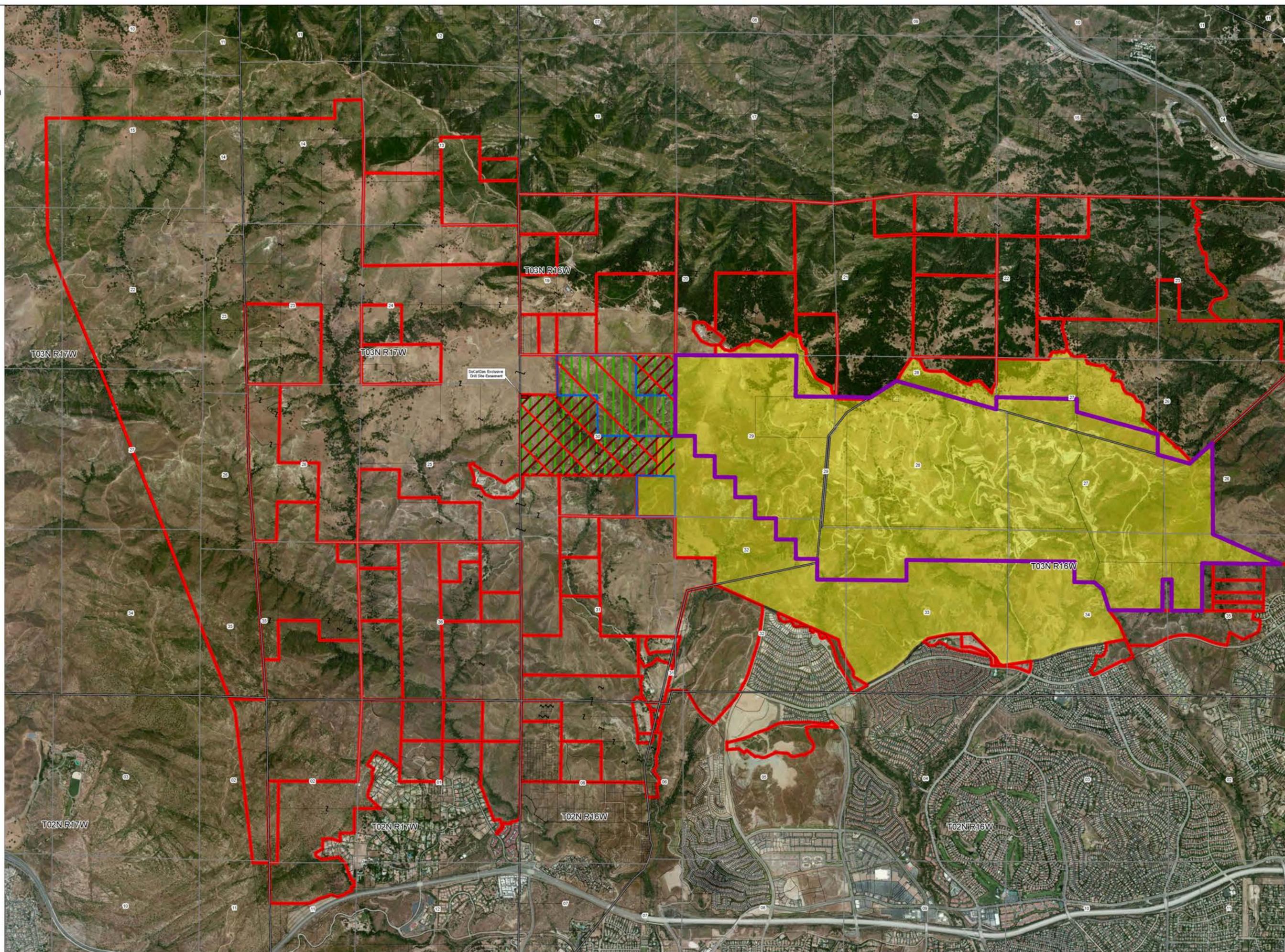


A Sempra Energy utility

Los Angeles County, California
May 19, 2014

Legend

-  Southern California Gas Company Storage Field
-  SoCalGas Oil/Gas Lease - BLM
-  Unit Agreement Boundary
-  Mineral and Geothermal Rights
-  Underground Storage Rights
-  Blanket Pipeline and Road Easement



Prepared by:
PetroLand Services

1 000 2 000 3 000 Feet

From: [Theresa Brady](#)
To: [Emma Howard](#)
Subject: The significant ecological areas.
Date: Saturday, June 21, 2014 12:48:51 PM

I hope that you already received comments to keep the Santa Susana and Simi Hills SEA as it was in the proposal. Many acres of important habitat include springs and other features important to wildlife.

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

GLENN PARKER
CHAIR
PUBLIC MEMBER
ORANGE COUNTY

MICHAEL HUGHES
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PUBLIC MEMBER
LOS ANGELES COUNTY

BOB HENDERSON
CITY OF WHITTIER

CALIFORNIA STATE PARKS

CHRISTINE MARICK
CITY OF BREA

SANTA MONICA MOUNTAINS
CONSERVANCY

DICKIE SIMMONS
LOS ANGELES COUNTY
BOARD OF SUPERVISORS

JACK TANAKA
CITY OF DIAMOND BAR

JANE L. WILLIAMS
CITY OF LA HABRA HEIGHTS

May 23, 2014

Connie Chung
County of Los Angeles
Department of Regional Planning
General Plan Development Section
320 West Temple Street
Los Angeles, California 90012

Comments on Draft General Plan, Significant Ecological Areas Ordinance, Hillside Management Area Ordinance, and Related Documents

Dear Ms. Chung:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. Our agency has been following closely changes to the proposed General Plan, Significant Ecological Area (SEA) Ordinance, SEA boundaries, and Hillside Management Area (HMA) Ordinance. Our agency has provided numerous comment letters to Los Angeles County (County) on these topics over the years.

We emphasize that projects should demonstrate compatibility with biological resources (primarily through design) rather than just avoiding the most severe impacts or mitigating for those impacts. We appreciate your consideration of the following specific comments on the draft General Plan (January 2014), SEA Ordinance (Draft 5-March 25, 2014), HMA Ordinance (March 24, 2014), and related documents.

General Plan Land Use Designation

The General Plan proposes to change the land use designation of a key property located in the Missing Middle of the Puente-Chino Hills wildlife corridor to Rural Land 10 and Mineral Resources, from Open Space and Significant Ecological Area (in the 1980 General Plan, with revisions). (The 1980 General Plan also identifies this area as Non-Urban Open Space and Significant Ecological Area on the General Development Policy map.) These new proposed land use designations are shown on the land owned by City of Industry (to our knowledge) and Aera on Figure A.23, South Diamond Bar Land Use Policy, part of the proposed General Plan. We firmly believe these new designations are not warranted.

This land is also identified as SEA on the current draft of the General Plan. The Industry-owned property supports Tonner Canyon and is located in the “Missing Middle” of the Puente Hills wildlife corridor. The Puente Hills Missing Middle report (Conservation Biology Institute 2005) is recognized in the County’s 2013 Preliminary Draft Significant Ecological Area Program Guide (p. 17). We cannot overemphasize the importance of protecting Tonner Canyon. The Missing Middle report recommends protecting at least the middle and lower portions of Tonner Canyon. (Of note, the County depicted this area as predominantly Open Space-Parks and Recreation on the 2013 Draft.)

Regarding the Aera property, which is proposed to be changed to Mineral Resources, this area has not been shown to contain oilfield facilities in Aera’s previous biological document (PCR 2002). In fact, it supports sensitive plant communities such as extensive California walnut woodlands and coast live oak woodlands, as well as southern willow scrub. It supports, or is directly adjacent to Brea Canyon which supports, the sensitive species, southwestern pond turtle (it is difficult to determine the exact location on the proposed land use policy map). This property is in a key location surrounded by critical open space.

This area (both the City of Industry and Aera properties) has long been recognized as containing significant ecological resources, and this higher intensity land use designation is inappropriate in this key location of the Puente-Chino Hills wildlife corridor.

General Plan - General Comment

We support the March 12, 2014 letter (attached) by Puente Hills Habitat Preservation Authority commenting on the Revised Draft Los Angeles County General Plan 2035 (rev. 1/2014). We incorporate those comments by reference.

SEA Ordinance - General Comment

We support the April 14, 2014 letter (attached) by Puente Hills Habitat Preservation Authority commenting on the Draft Significant Ecological Area Ordinance dated March 25, 2014. We incorporate those comments by reference.

SEA Ordinance - Connectivity & Constriction Map

Our agency supports the County’s efforts to recognize, map, and protect through the SEA Ordinance habitat linkages and wildlife movement areas. We support the use of the SEA Connectivity & Constriction Map, specifically for the Puente Hills SEA.

SEA Ordinance - Permit Process for Single-Family Residences

According the draft SEA Ordinance and 2013 Preliminary Draft Significant Ecological Area Program Guide (Program Guide, p. 4), a single-family home is a permitted use in SEAs

and require a site plan review. The applicant is not required to prepare a SEA Site Impacts Report, there is no Significant Ecological Area Technical Advisory Committee (SEATAC) review, and there is no Planning Commission hearing. The County biologist(s) would review the project. Since single-family homes could result in notable impacts to SEAs and since there would be not be a rigorous review of the project, WCCA suggests critical changes to strengthen the process.

It is critical that the maximum development footprint of the residence be agreed upon by the applicant and County staff prior to the completion of the house design. This is necessary both to assure adequate onsite open space that can be protected to meet mitigation requirements, and to save the applicant re-design costs. This extra step must be clearly identified in Section 22.52.2920 Permitted Uses-Review Procedures, perhaps as a pre-application meeting with the County biologist and planner prior to the submittal of the application for Ministerial Site Plan Review.

According to the SEA Ordinance (22.52.2915.A.) and Program Guide (p. 4), it is our understanding that permitted uses, such as a single-family home, are required to follow the development standards. The development standards in the SEA Ordinance (22.52.2925.H.) include Habitat Preservation Areas calculated in accordance with the SEA Habitat Preservation ratios in the Appendix. The SEA Ordinance (22.52.2925.H.3.) specifies that a covenant and agreement shall be recorded in the office of the County Registrar-Recorder/County Clerk, agreeing to set aside the Habitat Preservation Areas as Natural Open Space in perpetuity. The covenant and agreement language must explicitly prohibit any fencing that impedes wildlife movement, lighting, animal keeping, storage of materials, structures, grading, solar panels, planting of non-native vegetation, and granting of easements to adjoining properties.

This required recordation of a covenant and agreement is a crucial component of the SEA Ordinance. It is critical that this requirement of the existing draft text not be weakened in any way or form. In fact, it should be made absolutely clear for single-family homes that the development standards must be followed, including the requirement to protect the Habitat Preservation Areas through recordation of a covenant and agreement. Under the current SEA Ordinance, it is unclear who would verify, and what the process is to verify, whether the development standards are being met for single-family homes. In Section 22.52.2920.B., Staff Biologist Site Review, the following underlined text should be added:

3. During the Staff Biologist review, the Staff Biologist shall prepare a written memorandum to the file addressing each of development standards in Section 22.52.2925 and whether the project meets those standards, if applicable. If an applicable development standard is not met, then the applicant shall be required to file a SEA conditional use permit.

However, we note that the process is further complicated because if no biological report is required for single-family homes in SEAs, how would a determination be made that the SEA Habitat Preservation Areas Ratio Requirements (in the Appendix) are met? As currently written, it appears that the County biologist would need to conduct the mapping and calculations of impact areas and mitigation areas, as well as make the determination as to whether the ratio requirements have been met. Although it appears that the intent of the SEA Ordinance is to focus County resources on the projects with greater impacts, as currently written, reviews of single-family homes will require sufficient additional permit application fees for the County biologist to adequately implement the ordinance. An applicant-supplied plot plan with the vegetation communities overlain would be a valuable resource for the County biologist to conduct his/her review. Ideally this would be available for the pre-application meeting (suggested above), but at the very least included in the information required for SEA site plan review (22.52.2920.A.). This would also help in the design of a project, including shifting project location and reducing structure size, in order to avoid impacts to SEAs and to reduce mitigation requirements (and mitigation costs for the applicant). Requiring anything less than a vegetation communities map with the proposed development footprint prior to a staff site visit would be a waste of County staff and applicant time.

We note that there may be some other flaws in the process for review of single-family homes. A single-family home with 200-feet of brush clearance could result in 2.8 acres of brush clearance area if the entire surrounding area is vegetated. If the lot is small, such as ½ acre, then the brush clearance would cover the entire lot and beyond. Unless a lot that includes and abuts natural vegetation is at least 275 feet deep, the entire lot would have to be cleared to meet fire department fuel modification requirements. That assumes a 25 foot front yard setback and a 50-foot-deep house protected by a 200-foot-wide clearance zone. There would be no room on the subject lot to set aside any Habitat Preservation Areas as required by the development standards (22.52.2925.H.) and Appendix specifying the ratios of Habitat Preservation Area to be provided to acres of SEA habitat to be developed. This development standard would not work for lots less than 275-foot-deep. The SEA Ordinance *must* specify how the impacts to the SEA habitat would be mitigated in that case. The only obvious solution is that the applicant pay an in-lieu fee to the County to allow the County to fund open space protection in the subject sea. Such an in-lieu fee should only be allowed on lots where there is no mathematical way to site a house without brush clearance affecting every square foot of the property. The in-lieu fee must be large enough to pay for the approximate per square-foot cost of parcels in the immediate vicinity. The amount of square feet protected either by the required covenant and restriction or in-lieu fees must be commensurate with the requirements in the development standards.

SEA Ordinance - Development Standards

We appreciate the text limiting brush clearance to areas outside of dedicated open space areas (22.52.2925.E.2.). We recommend the following underlined text be added to clarify an important point, that developments should be designed to also protect *proposed* open space areas.

New structures and infrastructure requiring areas of brush clearance shall not be located in such a way that any portion of the required areas includes existing or proposed dedicated open space areas on the lot or parcel of land or on adjoining or adjacent lots or parcels of land. In addition, such structures or infrastructure shall not be located in a way that any portion of the required areas of brush clearance will include undisturbed natural areas on adjoining or adjacent lots or parcels of land.

SEA Ordinance - Fatal Flaws Regarding Threshold Between Type A and Type B SEA CUPs

The provisions for SEATAC review, Planning Commission review, and the requirement for possible additional open space are key tools in the SEA development review process. These are required for Type B SEA Conditional Use Permit (CUP) projects. (According to the SEA Ordinance, the Habitat Preservation Areas used to mitigate for SEA impacts can be used to satisfy the requirements for Natural Open Space.) We understand that the County is trying to focus its resources on more intense projects. However, as the SEA Ordinance is currently written, some projects might slip through and be considered Type A SEA CUP projects, when in fact the potential impacts to SEA resources warrant the extra scrutiny under the Type B SEA CUP process. (It is our understanding that in any case, Habitat Preservation Areas are required for all Permitted Uses, Type A SEA CUP projects, and Type B SEA CUP projects, per Section 22.52.2925.H.) However, the thresholds for Type B SEA CUPs are too high (22.52.2935.D.). For example, it appears that a substantial project with many acres of permanent impact to sensitive SEA habitat such as coastal sage scrub or oak and walnut woodlands (but which do not support habitat of a sensitive species, and which do not reduce the Connectivity Area or Constriction Area below the minimum widths), could qualify for a Type A SEA CUP. Although Habitat Preservation Areas would be preserved through a covenant, there would be no SEATAC review or Planning Commission hearing.

We also note that land divisions that could significantly increase development density and result in substantially increased impacts to SEA habitat and resources could also slip through as a Type A SEA CUP. Once the homes are proposed on the newly created lots, those single-family homes would go through an even less rigorous review (Permitted Uses; Section 22.52.2915 and 22.52.2920).

To remedy these flaws, we recommend that additional thresholds be added to Section 22.52.2935.D. (add underlined text):

...the Director shall determine that a Type B SEA CUP is required if:...

f. The development would result in 15 acres of more of impact to SEA habitat, including fuel modification; or

g. The land division would result in the creation of two more new parcels.

SEA Ordinance - Open Space Recordation

With respect to open space protection, WCCA recommends that the process of recording a covenant and agreement for Habitat Preservation Areas in the Development Standards be solidified and clarified. The following underlined text must be added to Section 22.52.2925.H. Habitat Preservation Areas, as there is no other way to permanently and definitively memorialize the boundaries of the covenant.

3. Prior to the approval of the Site Plan Review, a covenant and agreement shall be recorded in the office of the County Registrar-Recorder/County Clerk, agreeing to set aside the Habitat Preservation Areas as Natural Open Space in perpetuity. The applicant shall provide an engineer-stamped recordable metes and bounds legal description and plot map of the Natural Open Space, which shall be recorded with the covenant and agreement. The covenant and agreement language must explicitly prohibit any fencing that impedes wildlife movement, lighting, animal keeping, storage of materials, structures, grading, solar panels, planting of non-native vegetation, and granting of easements to adjoining properties. Habitat Preservation Areas shall also be depicted on the SEA Development Map.

Similarly in the Section 22.52.2945. Uses Subject to Permits – Conditions of Approval or Issuance, any recordation of a covenant and agreement for Natural Open Space should include an engineer-stamped legal description and plot map showing the open space. The following underlined text should be add to the end of the following two sections: A. SEA CUP. 2. Open Space. c. Open Space Recordation. i. for land divisions, and ii. for other projects: “The applicant shall provide an engineer-stamped metes and bounds legal description and plot map of the Natural Open Space, which shall be recorded with the covenant and agreement. The covenant and agreement language must explicitly prohibit any fencing that impedes wildlife movement, lighting, animal keeping, storage of materials, structures, grading, solar panels, planting of non-native vegetation, and granting of easements to adjoining properties.”

SEA Ordinance - SEA Findings

We concur with Habitat Authority's comments (April 14, 2014 letter) that the findings regarding preserving SEA viability (22.52.2950.A.3.) in the SEA Ordinance are too dire. The County should consider adding the SEA CUP compatibility criteria from the Program Guide (p. 17, SEA Site Impacts Report, 3.F. i.-v.) to the findings in the SEA:

- i. That the requested development is designed to be highly compatible with the biotic resources present, including the setting aside of appropriate and sufficient undisturbed areas;
- ii. That the requested development is designed to maintain water bodies, watercourses, and their tributaries in a natural state;
- iii. That the requested development is designed so that wildlife movement corridors (migratory paths) are left in an undisturbed and natural state;
- iv. That the requested development retains sufficient natural vegetative cover and/or open spaces to buffer critical resources, habitat areas, or migratory paths; and
- v. That the roads and utilities serving the proposed development are located and designed so as not to conflict with critical resources, habitat areas, or migratory paths.

HMA Ordinance - Conditional Use Permit (CUP) Requirements

Per Section 22.56.215.D., a CUP shall be required for any development located wholly or partially in an HMA, except for: "1. Development on a single lot or parcel of land, provided that grading in connection with the development does not exceed 15,000 cubic yards of cut plus total fill material..."

The various drafts of the HMA Ordinance have included different thresholds and different types of development for this exception. The current draft should reincorporate this provision for single-family homes and identify appropriate thresholds for single-family homes and for other types of development, such as 5,000 cubic yards. A high overarching threshold would miss many smaller development projects, which will undoubtedly result in significant adverse cumulative biological and visual effects over time.

HMA Ordinance - Open Space Ownership and Management

With respect to open space protection, WCCA recommends that the process of recording a covenant and agreement for required open space be solidified and clarified. The following underlined text must be added to Section 22.56.215.F.4. Open Space Recordation. There is no other way to permanently and definitively memorialize the boundaries of the open space.

a. If the development is a land division, required open space areas shall be shown on the tentative map and the final map or parcel map waiver, and shall be subsequently recorded on the final map or parcel map waiver as a fee lot or as an Open Space – Restricted Use Area in the office of the County Registrar-Recorder/County Clerk. The applicant shall provide an engineer-stamped metes and bounds legal description and plot map of the Open Space, which shall also be recorded.

The above underlined text should also be added to subsection b., which refers to development that is not a land division.

HMA Ordinance - Infeasibility of a Dedication of Conservation Easement

It is important to clarify and strengthen the process of conservation easements and land dedications. The HMA Ordinance includes another scenario for open space ownership and management for land divisions, as stated in Section 22.56.215.F.5.c.: “A conservation easement that requires the open space to remain in perpetuity and extinguishes all future development rights...” This provision, at the minimum, must require conservation easements to be recorded in an Irrevocable Offer to Dedicate, where the offer shall be irrevocable for a period of 21 years from the date of recording. In addition, the applicant shall provide a current title report with hyperlinks to the County for its file and the use of potential easement holders. It must be incumbent on the landowner (and all future owners) to not affect the title in any way that will degrade the easement. The applicant shall also provide a recordable engineer-stamped metes and bounds, and plotted legal descriptions of both the easement and the servient estate. The Offer to Dedicate defines a time period for which the applicant can make appropriate efforts to find a public agency willing to accept the offer. The applicant shall not declare that dedication of a conservation easement is not feasible before the expiration of the offer.

More importantly, WCCA continues to oppose the ownership and management of open space lots by a homeowners’ association (HOA) – particularly if there not a conservation easement. We have seen cases where after a development is built and a HOA becomes involved in the management of the open space, it becomes evident that the HOA goals are contrary to the primary mandate of protecting the biological resources in perpetuity. There is also precedence of HOAs allowing open space lots go to tax default. Conservation easements however do survive through a tax default sale by the County.

The infeasibility of a dedication of a conservation easement, as stated in Section 22.56.215. F.5.d must be better defined to ensure that all applicants have demonstrated satisfactory effort in finding a willing non-profit organization or public entity to accept a conservation easement. This section refers to land divisions where open space lots would be provided. We recommend removing the following ~~strikeout~~ text and adding the following underlined text to this section to provide this clarification:

...ownership and management of the open space lots. This may be established through one or more of the following...

d. A maintenance agreement with a Home Owners' Association or Property Owner's Association where demonstrated that dedication to the entities above or a conservation easement is infeasible, only when it is demonstrated that there are no conservation-oriented non-profit organizations and government entities, such as a county, city, state, federal, or joint powers authority willing to accept the dedication of conservation easement or dedication of open space lots.

The applicant must have substantial evidence to demonstrate that the dedication of a conservation easement is not feasible. Letters must be obtained from each contacted public agency stating reasons why that particular agency cannot accept the conservation easement or land. Efforts should be made to ensure that all public agencies capable of accepting conservation easements are contacted, including the Mountains Recreation and Conservation Authority (MRCA).

The MRCA is among one of the many public agencies in the County that is dedicated to the preservation and management of open space, parklands, watershed lands, trails, and wildlife habitat. The MRCA has the flexibility to accept any conservation easement throughout Los Angeles County. Furthermore, there are other joint powers entities such as WCCA that are also willing to accept conservation easements, in order to help implement the intent of the HMA Ordinance.

We appreciate your consideration of these comments. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Parker", written in a cursive style.

Glenn Parker
Chairperson

Attachments

April 14, 2014 letter by Puente Hills Habitat Preservation Authority, Comments on the Draft Significant Ecological Area Ordinance dated March 25, 2014.

March 12, 2014 letter by Puente Hills Habitat Preservation Authority, Comments on Revised Draft Los Angeles County General plan 2035 (rev. 1/2014).

References

Conservation Biology Institute. 2005. Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor. Final Report. July.

PCR Services Corporation. 2002. Biological Constraints Analysis Aera Master Planned Community. Significant Ecological Area 15, Tonner Canyon/Chino Hills, Los Angeles/Orange, County, California. Prepared for Los Angeles County Regional Planning Significant Ecological Areas Technical Advisory Committee. April.



April 14, 2014

Agenda Item VIII
WCCA
5/23/14

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

Comments on the Draft Significant Ecological Area Ordinance dated March 25, 2014

Dear Ms. Howard:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Significant Ecological Area (SEA) Ordinance (dated March 25, 2014). The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

The Habitat Authority thanks and acknowledges the Department of Regional Planning for the incorporation of certain comments on the previous SEA Ordinance Summary Draft dated June 2012, December 20, 2012 and December 5, 2013. These comments included suggested language for development standards within SEAs, such as exclusion of invasive plants, fencing to promote wildlife movement, and avoidance of habitat impacts from fuel modification. However, certain comments were not addressed in the current Draft Ordinance and are included below for reference, along with additional comments.

SEA ORDINANCE

Those comments with an asterisk (*) are reiterated from a previous Habitat Authority comment letter on an earlier draft but still apply.

22.52.2910 - Applicability

1. * Subsection C.6. Please broaden the exemptions. The exemption from the SEA Ordinance noted in Subsection C.7. is for “any of the following activities required, requested, authorized or permitted by a governmental agency: (a) Removal or thinning of vegetation for fire safety or in response to an emergency; and (b) Hazard management activities in response to an emergency or other public safety concerns.” We suggest that activities involving removal of non-native vegetation (including by herbicide) and habitat restoration (including, but not limited to, seeding, planting of container plants, and irrigation) also be exempted activities by open space management government agencies. We also suggest exemption of government agency activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities.

22.52.2915–Permitted Uses

2. *Subsection B. Please remove all development areas on Habitat Authority property from the maps. This subsection allows for uses or projects located within developed areas identified in the SEA Development Map. However, based upon a review of the Proposed Developed Areas available through the Department’s GIS-NET3, many of these mapped areas in the proposed Puente Hills SEA appear to be incorrect. Some existing fuel modification zones are mapped, and others are missing. Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed that are on Habitat Authority properties. Since the Habitat Authority will not be allowing expansion of development activities within fuel modification zones on lands managed/owned, this layer on the map needs to be adjusted.
3. *Subsection F. Please broaden the exemptions so public funds are not spent unnecessarily. This allows for activities conducted by governmental agencies to improve the quality of biological resources in an SEA, including non-native vegetation removal programs, native habitat restoration programs, and construction of wildlife under and overpasses for habitat linkages and wildlife corridors. It was requested earlier in this letter and in previous letters that such activities be exempt and we still make that recommendation, as they are conducted for the sole benefit of habitat improvement and generally have very minor impacts. However, if they remain as Permitted Uses requiring Site Plan Review, it is our understanding that such review would only apply to new or existing programs, and would not be required for every individual project, some of which are quite small and isolated. For example, the Habitat Authority has an existing Resource Management Plan (RMP) which includes non-native vegetation removal and habitat restoration programs; it is our understanding that the RMP could be submitted for Site Plan Review and approval, and that any subsequent activities consistent with that RMP would be permitted without individual site plan review. This would include , that activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities

necessary for open space management activities be exempt as requested earlier in this letter and in previous letters; If these activities are not exempt then the intent of the Ordinance may be defeated by the abundance of County staff resources necessary to follow up and make site visits that would be required per this proposed Ordinance due to the many activities of governmental land management agencies county-wide. These activities described above are integral to the management of biological resources, and often have minor impacts compared to other permitted uses such as single-family residences. The requirement for open space management activities (such as non-native vegetation removal or demolition of trails) to undergo a Site Review or Conditional Use Permit process would needlessly cost the County, and land management agencies (which are already struggling with limited resources) additional unanticipated funds which could be used for actual improvement of biological resources and would unnecessarily delay safety, maintenance, and educational management actions on properties enjoyed daily by the public. Please also consider indicating in the ordinance that the Site Plan approval has no term limits.

22.52.2925 - Development Standards This section lists the development standards non-exempt activities would need to adhere to when conducted within SEAs.

4. Subsection F. This subsection notes that new development may not narrow Connectivity Areas to a width of less than 1,000 feet at any point. Given that the spatial scale of corridors required to maintain viable populations can be partially determined by the species using that corridor, we suggest language that guides the width **and length** of Connectivity Areas to be appropriate for the suite of species, or focal species, at specific sites.
5. Subsection G. According to the development standards, new development may not narrow Constriction Areas to a width of less than 200 feet at any point. Given that the spatial scale of corridors required to maintain viable populations can be partially determined by the species using that corridor, we suggest language that guides the width **and length** of Constriction Areas to be appropriate for the suite of species, or focal species, at specific sites. For example, long corridors may not provide suitable conditions for the safe passage of animals, especially if predators are present.
6. Subsection J.2 table. Please consider adding language for the setback to clarify that when measuring the setback distance, measurements begin at the ordinary high water mark or watershed boundary.

Section 22.52.2935 –Uses Subject to Permits– Application Procedures

7. Subsection C. Please the following fourth **bold** item to identify and delineate during site review: **Special status species**

22.52.2945 –Uses Subject to Permits – Conditions of Approval or Issuance

8. *Subsection A.2.a.iii. More emphasis should be given to setting aside land that is contiguous with other preserved lands. This section prioritizes land to be provided as Natural Open

Space and gives preference to open space preserved on the same lot or parcel as the impact. This preference may not always result in the highest conservation value, especially if the resulting open space is small or isolated. Rather, preference should be given to preserving open space that is contiguous with other preserved lands, or to areas that will create or strengthen a habitat linkage or wildlife corridor. This type of strategic conservation will promote the viability of SEAs more than a piecemeal approach.

9. Subsection A.2.a.iii. (3) and (4). In addition, the Habitat Authority recommends switching priorities for numbers 3 and 4 so that Connectivity and Constriction Areas are given a higher priority for preservation as Natural Open Space. As it is important that those Connectivity and Constriction Areas have suitable habitat, restoration in those Areas should also be encouraged as part of maintaining the land in perpetuity.

22.52.2950 - Uses Subject to Permits – Findings

10. *Subsection A.3. SEA viability thresholds should be revised to better protect SEAs. This subsection lists the Findings required for the Hearing Officer or Regional Planning Commission to issue an SEA CUP. Subsection H.3 requires that a project cannot result in the loss of SEA viability, which is defined as (a) bisecting the SEA, (b) closing of a connectivity or constriction, (c) removing habitat characteristic of the SEA, (d) removing the only known location of an SEA species, or (e) removing the only known location of a new or rediscovered species. Items b, d and e provide a very high threshold for determining the loss of SEA viability. For example, the substantial narrowing of a connectivity area, not just the closing of the constriction, could result in SEA viability loss. Or the removal of key habitats or populations of certain species, not just the removal of the only known locations of that species, could also result in SEA viability loss. These SEA viability thresholds should be revised to be less limiting.

Thank you for your consideration of our comments. We look forward to reviewing the still to come sections of the Program Guide as soon as they are made available. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee
Connie Chung, Los Angeles County Department of Regional Planning



March 12, 2014

Agenda Item VIII
WCCA
5/23/12

County of Los Angeles
Department of Regional Planning
General Plan Development Section
Attn: Connie Chung, Supervising Regional Planner
Attn: Susan Tae, Supervising Regional Planner
320 West Temple Street
Los Angeles, CA 90012

Comments on Revised Draft Los Angeles County General Plan 2035 (rev. 1/2014)

Dear Ms. Chung and Ms. Tae:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the revised draft General Plan dated January 2014. On previous General Plan drafts, we provided comment letters dated 08/29/2007, 01/22/2009, 09/08/2011, 07/26/2012, and 11/7/2013. Comments that were not incorporated but that the Habitat Authority believes still apply are reiterated here.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

Part II. Planning Areas Framework

Chapter 5. II. Planning Areas Descriptions

1. In Table 5.1 on page 27, various Opportunity Area Types are listed as areas to be considered when preparing community-based plans. Please consider adding a type for Open Space .
2. It is assumed that on page 35 under Geography, “The San Gabriel River runs along the Interstate-610...” should be “The San Gabriel River runs along the Interstate-605...”.

Part III: General Plan Elements

Chapter 7: Mobility Element

3. On page 102, Section 5. Impacts of Transportation on Natural and Community Resources -The Habitat Authority recommends a discussion on how changes in transportation can influence accessibility of open spaces (i.e. greater access) leading to an increase in the number of visitors and potentially affecting biological resources.

Chapter 9: Conservation and Natural Resources Element

4. Policy C/NR 1.2 states “Protect and conserve natural resources, natural areas, and open spaces on park properties.” It is unclear why this would only pertain to “...park properties.” We believe it is the intent of the Policy to cover all natural resources, natural areas, open space, and potential park properties in unincorporated LA County. Therefore, please consider adding following in italics and deleting the strikethrough: “*Protect and conserve natural resources, natural areas, and open spaces on park properties.*”
5. Regarding Policy C/NR 1.5: “Increase and improve access to dedicated open space and natural areas for all users.” The County works with numerous land owners (see Appendix E) who own/manage open space within the jurisdiction of this General Plan. Since the County cannot control access to land that they don’t own/manage, please clarify by adding the following italicized language. “Increase and improve access to dedicated open space and natural areas for all users *as determined appropriate by each land management agency.*”
6. Policy C/NR 1.6 states “Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, woodlands, grasslands, and/or offer linkages that enhance wildlife movements and genetic diversity.” However there are numerous other important habitat types besides woodlands and grasslands that support important natural resources. Therefore, please consider amending the sentence as noted in italics with deletions in strikethrough: “Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, ~~woodlands, grasslands,~~ *habitat types* and/or offer linkages that enhance wildlife movements and genetic diversity.”

7. Regarding Policy C/NR 2.4 to “Collaborate with public, non-profit, and private organizations to acquire and preserve available open space lands.”, please consider adding the following language in italics to include the acquisition of land in different land use categories that could be converted to open space: “Collaborate with public, non-profit, and private organizations to acquire and preserve available open space lands *or other lands that could be converted to open space.*”
8. On page 128, 2nd paragraph, the Habitat Authority recommends that language be added into the SEA Ordinance allowing public land preservation agencies with adopted management plans to carry out all activities that contribute to the management of the land for preservation, access and safety.
9. On page 130, Policy C/NR 3.9 outlines design considerations for projects proposed in SEAs. The Habitat Authority recommends inclusion of a requirement that such projects retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and to preserve these areas in perpetuity through a recorded fee simple dedication to an open space park agency currently operating and/or based in the project area prior to the issuance of any permits.
10. Regarding Policy C/NR 7.2 to “Support the preservation, restoration and strategic acquisition of open space to preserve natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.”, the acquisition of land types, other than open space, could converted to open space for the protection of those resources. Therefore, please consider adding the following language in italics: “Support the preservation, restoration and strategic acquisition of open space, *and other land types that could be converted to open space,* to preserve natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.”
11. In Section IV Goals and Policies, Policy P/R 1.9 is to “offer more lighted playing fields using energy efficient light fixtures where appropriate to extend playing time.” Please consider implementing spill light limits on ballfields that are adjacent to open space. We suggest the following: “All lighting shall be designed and shielded with the intent of preventing spillage of light into adjacent open space areas. All lighting shall be constructed so that all light emitted by the fixture, either directly from the lamp or from a diffusing element, or indirectly by reflection or refraction from any part of the luminaire, is projected away from the open space as determined by photometric test or certified by the manufacturer.”

Appendix E: Conservation and Natural Resources Element Resources

12. On page 40-41, regarding the summary of the Puente Hills SEA, it notes that “significant wildlife movement throughout the Puente Hills SEA has been documented in a two year carnivore study commissioned by the Santa Monica Mountains Conservancy as part of a multi-jurisdictional effort to establish a region wide wildlife movement linkage.” Please

update this statement to acknowledge numerous additional wildlife movement studies that have been conducted in this SEA on the Puente Hills Preserve, including several studies of both the Harbor Boulevard Wildlife Underpass and the Colima Road Underpass, all of which are available on the Habitat Authority's website (www.habitatauthority.org/publications).

13. Due to an agency name change, on page 44 (and throughout document), change "California Department of Fish and Game (CDFG)" to "California Department of Fish and Wildlife (CDFW)".
14. The Regional Habitat Linkages section in Appendix E (Conservation and Natural Resources Element) states on page 40 that "critical biological resources are maintained through habitat connectivity, which sustains population genetic diversity, and provides refuge for migrant species". In addition, the Significant Ecological Areas section of Appendix E (page 44) states that one of the two primary conservation principles on which the SEAs are designated is that "isolated habitat areas have less opportunity to regain species by re-colonization from other areas" and that "The SEAs are designed to provide habitat linkages between related habitat types...by encompassing areas of sufficient width to function as wildlife movement routes between these open space areas".

Please consider revising the SEA selection criteria to directly acknowledge the importance of habitat connectivity and wildlife movement corridors on pages 44-46. It is clear from the language in the Draft General Plan Appendix E, that wildlife movement corridors and habitat connectivity are critical to the concept of SEAs. However, the SEA selection criteria do not mention wildlife movement, corridors, or habitat connectivity¹. The only criterion that can be construed as being related is criterion D: "Habitat that at some point in the life cycle of a species or a group of species, serves as concentrated breeding, feeding, resting, or migratory grounds, and is limited in availability either regionally or in Los Angeles County". Please consider revising the SEA selection criteria to include lands that provide habitat connectivity and wildlife movement corridors and opportunities, as consistent with the Draft General Plan in Appendix E. The maintenance of wildlife populations in western portions of the Puente-Chino Hills, such as in the Habitat Authority's Preserve, are critically dependent on the movement of individuals from locations further east in the Corridor, and a reduction of this potential movement may pose a serious threat to the persistence of these populations in the future².

¹ PCR. 2000. Los Angeles County Significant Ecological Area Update Study 2000: Background Report. Prepared for: Los Angeles County Department of Regional Planning, November 2000.

² Conservation Biology Institute. 2005. Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor. July 2005.

The following comments are regarding the description of the Puente Hills SEA, beginning on page 136:

15. On page 138, fourth paragraph, please note in the text that Sycamore Canyon also supports coastal cactus wrens.
16. On page 139, first paragraph, please add language that describes the habitat in Arroyo San Miguel as coastal sage scrub, chaparral, grassland and riparian and supporting a population of federally-threatened coastal California gnatcatcher.
17. Please note that as of August 15, 2011, due to an amendment of the Habitat Authority's Joint Powers Authority Agreement, the official agency name changed to Puente Hills Habitat Preservation Authority (PHHPA). Please use this name when referring to the agency in future documents and correspondence. On page 139, the last paragraph still references the old agency name. Please check the document for other instances.
18. The open space of the Puente Hills between Harbor Blvd. and State Route 57 has been previously shown to be of great conservation concern to the entire Puente-Chino Hills corridor, both for its value in linking the west and east corridor as well as because of its intrinsic value in supporting significant populations of sensitive animal species.

Comments on Community Climate Action Plan

Based on review of the Community Climate Action Plan, the Habitat Authority respectfully submits the following comments:

1. Page 5-6, Table 5-1, Land Conservation and Tree Planting – Protect Conservation Areas: Please consider not only the evaluation of the Oak Woodland Conservation Management Plan for the preservation of existing oak woodlands but preserving all other native habitats as well. There are numerous native habitats within Los Angeles County that provide important habitat for a suite of species including those protected by law such as the federally threatened California Gnatcatcher, *Poliopitila californica*, that depends on coastal sage scrub habitat and the California State Species of Special Concern Coastal Cactus Wren, *Campylorhynchus brunneicapillus*, that nests almost exclusively in prickly pear (*Opuntia littoralis* and *O. oricola*) and coastal cholla (*O. proliferus*), within coastal sage scrub habitat, to name a few. In addition, the California endemic Southern California black walnut (*Juglans californica* var. *californica*) is severely threatened by urbanization and is considered by The Nature Conservancy and the state of California to be one of California's "rare and imperiled natural communities" (<http://www.fs.fed.us/database/feis/plants/tree/jugcal/all.html>). The Chino-Puente Hills is a major center of distribution for this species and is one of the dominant woodland community tree species in the Puente Hills Preserve. Therefore, please consider revising the Initial Implementation Step in Protecting Conservation Areas to include a complete review of all native communities.

2. Page C-20, LC-2 Create New Vegetated Open Space – Additional Information:
This section currently states that “New vegetated open spaces should be designed and maintained to minimize the spread of invasive species.” Please considering adding language to encourage the use of drought-tolerant native plantings in all revegetation projects since this can contribute to decreasing water consumption.

3. Page C-20, LC-4 Protect Conservation Areas – Action Status:
The *Additional Information* (page C21) acknowledges that open spaces can sequester atmospheric CO₂ creating a sink of carbon and thus having Greenhouse Gas (GHG) benefits. However, the Plan currently states that “GHG emissions reductions have not been quantified or counted toward attainment of the County’s CCAP target.” Therefore to acknowledge the contribution of open spaces as carbon sinks, the Habitat Authority recommends conducting a quantifiable analysis of open space area contributions to atmospheric CO₂ sequestration.

4. Page C-21, LC-4 Protect Conservation Areas – Approaches:
To support the Action Goal of “Encourage the protection of existing land conservation areas” please consider the preservation of other native habitats besides oak woodlands (see detailed info in comment 1).

We appreciate the opportunity to comment on the General Plan and CCAP documents. Please notify us when the Habitat Conservation Plan, Mitigation Land Banking Program, Trails Master Plan, Open Space Land Acquisition Strategy, and Oak Woodland Conservation Management Plan, documents are available for public review.

Thank you for your consideration of our comments. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee