



California Construction and  
Industrial Materials Association

April 11, 2014

VIA EMAIL

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

RE: Comments Regarding Draft 5 of the Significant Ecological Areas

Dear Ms. Howard,

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.

We are deeply concerned with the proposed Significant Ecological Areas (SEA) overlay which, as currently drafted, would create direct and detrimental conflict with current and future aggregate materials operations located in the Antelope Valley and Santa Clara River Valley areas of Los Angeles County. Our members' facilities are located on finite mineral deposits, and often, such deposits have been identified by the State as significant to the Los Angeles region or to the State as a whole. These facilities have been in operation for years and are already subject to extensive and repeated environmental review. Expanding the SEA to include these mineral resource deposits and facilities and forcing projects to undergo even more extensive review is illogical and unnecessary.

The classification of aggregate resources in the three-county area of Los Angeles, Orange and Ventura was followed by a "designation" process performed by the State Mining and Geology Board (SMGB). This process formally recognized significant deposits that could provide for future needs and was conducted in full compliance with CEQA. Maps and descriptions of the deposits were placed in the California Code of Regulations and officially transmitted to those county and city governments empowered with authority over the use of those lands. The proposed SEA overlay is therefore in direct conflict with the already- identified needs of the County and the State of California.

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The State has continued to express concern about aggregate availability. The 2012 California Geological Survey *Sustainable Aggregates* report states that the County will require more than 476 million tons of aggregates over the next 50 years while only 77 million tons are currently permitted. Thus, according to the State's expert agency, the County has permitted less than 20% of construction aggregates needed to meet its projected need. Increasing the SEA overlay over significant mineral resource areas would directly conflict with the recognized needs of the County. Additionally, the proposed SEA expansion would pose considerable challenges to any future plans for aggregate companies to expand their operations, creating serious long-term impacts to the County through significant losses of high-paying jobs and tax revenue.

Increasing the review of a reclamation plan for surface mining by the Significant Ecological Areas Technological Advisory Committee (SEATAC) and the added bureaucratic authority of SEATAC to make recommendations on a surface mining site is unreasonable. A surface mining reclamation plan is highly technical and is produced by experts in the mining industry, including geologists, engineers, and landscape architects. Any additional review by an appointed SEATAC official would be unnecessarily duplicative, burdensome and costly.

As a statewide association, CalCIMA represents the majority of aggregate producers in the potentially impacted area. As of yet, none of our members have been notified that their facilities and properties could potentially be included within the proposed SEA overlay. We therefore respectfully request that our members and other property owners have due process of notification in the future. Sending mass email blasts to the public has proven to be a wholly inappropriate and ineffective communication method, which does not achieve "meaningful" notice, and therefore fails to provide due process.

Based on the foregoing, CalCIMA requests that the SEA ordinance be revised so that any mineral resource deposits classified as MRZ-2 or designated as regionally significant are excluded from the coverage of the SEA overlay.

As the County continues in the SEA process we would certainly be amenable to meet to discuss our industry's specific issues.

Sincerely,



Angela Driscoll,  
Director, Local Government Affairs

cc: Richard Bruckner – Director, Regional Planning  
Edel Vizcarra – Supervisor Antonovich Office