



**Palmdale Area Office**

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April 22, 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*

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

Dear Ms. Howard,

Granite Construction Company (Granite) is very concerned about the Proposed Significant Ecological Area (SEA) overlay. The proposed SEA expansion will have severe and detrimental impacts to our existing, and future, operations within Los Angeles County (County).

Granite is a full-service general contractor, construction management firm, and construction materials producer operating in the County. Granite has a long history of building in California, including some of the first roads in Yosemite National Park, many of our military runways, and segments of the California Aqueduct. Consistently recognized as one of the top 25 largest construction companies in the U.S., we specialize in heavy civil, complex infrastructure projects serving the transportation, industrial, and federal markets.

Granite has permitted sand and gravel operations serving the County, which produce aggregate materials such as road base and asphalt paving material providing civil contractors with the materials needed to build and maintain the roads, highways, and other public infrastructure. The proposed SEA expansions will envelope our operations and create significant regulatory, operational and financial barriers going forward.

**THE PROPOSED SEA EXPANSION WILL HAVE SIGNIFICANT NEGATIVE IMPACTS ON AGGREGATE AVAILABILITY WITHIN THE COUNTY**

Construction aggregate is the largest non-fuel mineral commodity produced in California, and plays a major role in the State and County economy. Aggregate is the most basic material in the construction industry. Aggregate is used for roads, foundations, structures, airport runways, backfill, flood control, and slope stability; all of which are necessary products for growth and maintenance.

The State has continued to express concern about aggregate availability. The 2012 California Geological Survey *Sustainable Aggregates* report states that the Palmdale market (where our facilities are located) will require more than 577 million tons of aggregates over the next 50 years, *yet only 152 million tons are currently permitted*. According to the State's expert agency, these permitted reserves will be consumed in 11-20 years as the market meets its projected needs.

The proposed SEA expansion will newly impose SEA restriction on existing facilities (currently outside of the SEA areas), significantly impacting existing operations and potentially further limiting existing permitted reserves available to address County needs. The proposed SEA expansion will create considerable challenges to existing facilities, such as hampering modernization efforts, and will create new regulatory barriers to the reasonable expansion of existing operations to meet the County's aggregate needs.

Beyond the impact the SEA expansion boundaries will have to Granite, there will be significant secondary impacts to public infrastructure agencies and private builders. Scarcity of locally sourced aggregate materials will require the import of material from further distances, significantly increasing construction and maintenance costs.

Some of the largest secondary impacts will be seen by public infrastructure agencies such as LA County Public Works, METRO, CALTRANS, flood control districts, airports and the Military Bases located within the County. As costs rise their budgets will be further strained to keep up with their aggregate demands. In addition to cost increases, there will also be greater transportation and environmental impacts associated with delivering materials to their projects.

Increasing the SEA overlay over significant mineral resource areas will have severe negative impacts on the existing and future aggregate availability within the County.

#### **THE PROPOSED SEA IS IN DIRECT CONFLICT WITH EXISTING DESIGNATED AREAS OF STATE WIDE SIGNIFICANCE**

Some of the proposed SEA expansion areas superimpose new SEA designations over existing designations of State wide of significance. The State Mining and Geology Board (SMGB) formally classify significant aggregate resources within the State. This process formally designates Mineral Resource Zones (MRZ) as resources of regional significance by the State, and requires lead agencies to recognize these significant resources where they are located in their planning processes.

Maps and descriptions of MRZ are placed in the California Code of Regulations, and officially transmitted to those county and city governments empowered with lead agency authority over those lands. This information is provided to lead agencies to promote sustainable planning practices, such a locally sourced materials and preventing conflicting planning designations.

The currently proposed SEA boundaries conflicts with, and ignores, the already identified MRZ areas of significance within the County.

#### **IMPACTS ON AGGREGATE FACILITIES AND AVAILABILITY MAY BE IN CONFLICT WITH STATED AB 32 GOALS**

In 2006, the Legislature passed and Governor Schwarzenegger signed AB 32, the Global Warming Solutions Act of 2006, which set the 2020 greenhouse gas emissions reduction goal into law. The California Air Resources Board has focused much of their efforts on reducing vehicle emissions and vehicle miles traveled in implementing AB 32.

As stated above the proposed SEA expansion is anticipated to negatively impact existing aggregate availability, and creates significant barriers to developing new aggregate resources within the County. However, the aggregate demands of the County will still exist.

As permitted aggregate facilities within the County run out of material, needed aggregate materials will be imported from outside the County to meet demands. *The proposed SEA expansion will create a land use policy that discourages locally sourced aggregate materials within the County, requiring the shipping of materials from outside the County.*

Importing aggregate from ever further distances increases greenhouse gas emissions (GHG) associated with trucking materials, decreases regional air quality, and further impacts the County's overstressed surface transportation network, all of which conflicts with AB 32 goals.

**GRANITE HAS BEEN PROVIDED NO FORMAL NOTICE OF THE PROPOSED SEA EXPANSION**

We stress that a surface mining reclamation plan is highly technical and is produced by experts in the mining industry, including geologists, engineers, and landscape architects. Additionally, the development and approval of mining permits are reviewed not only by the County, but also by State technical experts. Adding new reviews by an appointed SEATAC official would be unnecessarily duplicative, burdensome, costly and potentially conducted without the relevant technical background.

Our facilities represent investments of 10's of millions of dollars in the County, and provide high paying labor jobs. Despite the fact that the proposed SEA expansion will envelope our existing operations, to date Granite has received ***no formal notification*** that our facilities and underlying property will be included within the proposed SEA overlay. Neither has County Staff consulted with us regarding the new potential impacts the SEA overly could have to our existing facilities and permits.

Granite respectfully requests due process of notification in the future.

**GRANITE REQUESTS MODIFICATION OF THE PROPOSED SEA BOUNDARIES**

Granite requests that the proposed SEA boundaries be modified so our existing facilities, any mineral resource deposits classified as MRZ-2, or other mineral resources designated as regionally significant are excluded from the coverage of the SEA overlay.

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

Sincerely,



Bill Taylor  
Resource Development Project Manager  
Granite Construction Company

CC: Richard Bruckner – Director, Regional Planning  
Edel Vizcarra – Supervisor Antonovich Office  
Norm Hickling – Supervisor Antonovich Office