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Emma Howard
Los Angeles County Department of Regional Planning
General Plan Development and Housing Section
320 W. Temple Street, Room 1354
Los Angeles, CA 90012

Re: Comments on Draft 5 of the Proposed Significant Ecological Areas

Dear Ms. Howard,

This letter was prepared in response to Draft 5 of the Los Angeles County (County) proposed Significant Ecological Area (SEA) expansion. CalMat Land Company (a.k.a Vulcan Materials Company) would like to protect the interests of their two properties located in Los Angeles County, California. Vulcan Materials Company appreciates your consideration of our comment prior to the hearing scheduled for April 23, 2014.

Vulcan Materials Company is a major producer of construction aggregates and aggregated-based construction materials in the State of California. Large quantities of aggregates are used to build and repair valuable infrastructure such as roads, bridges, waterworks, and ports, and to construct buildings such as homes, schools and hospitals.

The Vulcan Materials Company operations will be negatively affected by the proposed SEA expansion in association with the Los Angeles County General Plan Update and this letter has been written to ensure that the County has considered the potential impacts to the natural mineral resources in the area. It is imperative that the significant aggregate materials located in the Antelope Valley and Santa Clarita River Valley areas of Los Angeles County remain unaffected by the proposed SEA expansion. Our primary concerns include the following:

Vulcan Materials Company is interested in the preservation of mineral resources as well as significant natural habitat. The SEA should define the specific critical habitat areas for clarity. The sensitive species and habitat information was generalized to include a vast majority of the areas in the County—disturbed and undisturbed without a proper scientific evidence supporting the purpose for the proposed boundary expansion. The SEA Ordinance is forcing the landowner to invalidate the SEA assumptions.

The SEA is proposed to expand to include areas with low biological activity. The Vulcan Materials Company operations include areas that were historically disturbed and are currently utilized for

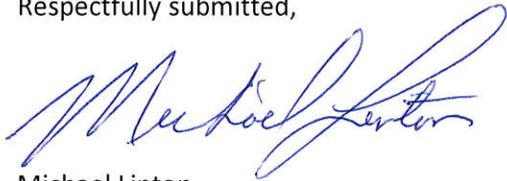
industrial purposes. Expanding the SEA to include these existing industrial areas and forcing potential projects to undergo more extensive review is not logical. Vulcan Materials Company requests that the County consider removing areas that possess significant mineral resources and are currently operated for industrial purposes from the proposed SEA expansion.

The proposed increased review of reclamation plans for surface mining by the Significant Ecological Areas Technological Advisory Committee (SEATAC), with the ability for SEATAC to make recommendations for the project is unreasonable. The information regarding the selection process for SEATAC members has not been presented. Vulcan Materials Company is concerned that there is potential for the review board to be unfamiliar with surface mining reclamation plans and have a possible biased anti-development agenda.

The County relies heavily on aggregate materials and demand is expected to increase in the future. Vulcan Materials Company supplies a significant amount of aggregate that is mined in this region. Vulcan Materials Company cannot relocate their operations because they rely on finite resources that are located in specific State designated mineral resource areas. The proposed SEA expansion conflicts with the State designated mineral resource areas and has negative consequences on future plans for Vulcan Materials Company to expand their operations to potentially provide for the future needs of the County.

Please do not hesitate to call me at (818) 553-8953 if you have any questions or would like to discuss. Thank you for your time and we look forward to hearing back from you.

Respectfully submitted,



Michael Linton
Vice President, Properties & Land Development