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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.

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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,

Vick Medina
Executive Director