



June 15, 2018

Supervisor Sheila Kuehl
Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Subject: Safe, Clean Water LA

Dear Supervisor Kuehl:

Established in 1924, Central City Association (CCA) is committed to advancing policies and projects that enhance Downtown Los Angeles' vibrancy and increase investment in the region. As an economic and cultural center with a daytime population of 500,000 people and millions of visitors each year, our community and our members depend on the daily availability of clean and reliable water.

CCA has been a member of the Safe, Clean Water LA stakeholder advisory committee since last year and has provided both general and technical comments throughout the process. We appreciate the opportunity to share our perspective and the diverse views represented on the committee. With the ordinance and rebate program set to be considered by the Board of Supervisors next month, we would like to share our priorities with you and your colleagues on the Board.

Emphasis on water quality

As we have regularly stated in the stakeholder advisory committee, we believe that water quality and compliance with MS4 permits should be the chief goal of the Safe, Clean Water LA program. Given the importance of meeting these water quality goals, and the ecological and financial costs of failing to meet them, water quality must be of paramount concern for a stormwater funding measure.

We are concerned that 40 out of 100 points allocated for water quality in the Project Criteria table is too few, and reflects a program structure that does not appropriately prioritize water quality. Water supply and community enhancements are important goals as well, and should be pursued in tandem with water quality improvements wherever possible. However, with a fixed amount of funding we can only purchase so much of each benefit, and we do not believe that water supply and community enhancements should outweigh water quality as, combined, they currently do. Water quality should represent at least half of the points in the Project Criteria.

Local return guidelines

CCA also believes that stronger guidelines are needed for local return spending to ensure that funds are directed toward high-value water quality projects and operations.

Cities and other government stakeholders have argued that such controls are not necessary because they are the ones ultimately liable for MS4 non-compliance. We understand this perspective but we also feel that cities themselves will benefit from such guidelines, providing an effective response to constituents who want to spend funds on issues unrelated or tangential to water quality improvements.

Such guidelines will also give voters greater confidence that the revenues from the stormwater tax will be spent effectively and as promised.

In particular, we do not believe that the current guidelines for maintenance of effort are adequate, with only 70% of funds required to be spent on new projects or activities. If the remaining 30% is intended to accommodate cities that are already self-funding water quality efforts, rather than simply allowing cities to backfill existing commitments, we should set a higher threshold (90% or higher) for maintenance of effort and expand the exemptions that are offered for specific self-funding efforts and activities.

Clear communication of benefits

Something that has been lacking in the Safe, Clean Water LA program, up to this point, is a clear message about what it will achieve overall.

A number of specific projects have been discussed, as well as general benefits from improved water quality, supply, and community enhancements. However, we haven't been given even an approximation of the scale of water quality benefits, or how close we would be to MS4 compliance after 10 years, or how much additional water supply could be captured within the county, for example. These are important metrics that our members and residents across the county will need, not just to better understand why a stormwater funding measure may be necessary but also so they can hold the county and 88 cities accountable for hitting those targets.

Expanded rebates

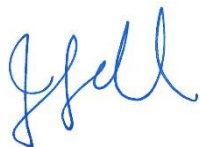
CCA agrees with the County that property owners who are already capturing water and/or treating water on-site should receive a significant rebate from the stormwater tax. We understand the rationale for rebating less than 100% of the tax; however, we believe the credit program should be expanded in a few important ways.

First, the program should include additional rebates (beyond 65%) for property owners and developers who go above and beyond existing requirements, or who capture and/or treat water beyond the boundaries of their own parcel. Ideally this should be paired with an incentive program that encourages developers to provide additional benefits before buildings are completed, when improvements are least costly.

Second, the County should allow properties of less than 50 acres to participate in the rebate program. Given your valid concerns about oversubscription of the rebate program, you may consider reducing the minimum property size to 10 acres and reserving the right to increase the threshold by 10 acres each year, to a maximum of 50 acres, if rebate requests exceed some predefined threshold.

Thanks once again for the opportunity to participate in this process.

Sincerely,



Jessica Lall
President & CEO, Central City Association of Los Angeles