



June 29, 2018

Hon. Sheila Kuehl, Chair, Los Angeles County Board of Supervisors
Hon. Janice Hahn, Chair Pro Tem, Los Angeles County Board of Supervisors
Hon. Hilda L. Solis, Supervisor, First District, Los Angeles County Board of Supervisors
Hon. Mark Ridley-Thomas, Supervisor, Second District, Los Angeles County Board of Supervisors
Hon. Kathryn Barger, Supervisor, Fifth District, Los Angeles County Board of Supervisors
Mark Pestrella, Director of Public Works, Los Angeles County

Re: Safe, Clean Water Program

Dear Honorable Chairwoman Kuehl, Supervisors, and Director Pestrella:

The Natural Resources Defense Council (NRDC) would like to thank you for your diligent work to develop the Safe, Clean Water Program, which is crucial to help Los Angeles County and local cities address the biggest source of water pollution in the region, stormwater pollution. We appreciate the County's efforts to create a program that balances all interests in the region while providing funding for projects that have multiple benefits to communities throughout the County.

Polluted runoff not only harms our waterways but also poses serious human health and safety risks. In Southern California, urban runoff is – and has been for at least a decade – the largest source of surface water pollution.¹ In addition to water quality concerns, runoff from the impermeable surfaces in the County endangers public safety by creating flooding, something that is more and more likely to occur with larger storm events due to climate change. Stormwater pollution and flooding concerns have plagued the region long enough and now is the time for the County to act.

The Safe, Clean Water Program (Program) provides an unparalleled opportunity to address the environmental, human health, and flooding issues created by urban runoff, and even help address some of the region's water supply issues, while providing other community benefits. Funds generated by the Program could be used to install distributed, nature-based projects that capture, treat, and/or reuse urban runoff while also providing flood control, water supply, air quality, community beautification, and other benefits. By allocating funding for projects in Disadvantaged Communities (DACs), the Safe, Clean Water Program will help ensure projects are built in communities that are the most in need of such projects, communities that have historically been overlooked and typically bear the burden of environmental degradation.

¹ Haan-Fawn Chau, *Green Infrastructure for Los Angeles: Addressing Urban Runoff and Water Supply Through Low Impact Development* at 50 (Apr. 17, 2009), http://www.waterboards.ca.gov/water_issues/programs/climate/docs/resources/la_green_infrastructure.pdf.

We support the County's efforts thus far, and we urge the Board of Supervisors to place a public funding measure on the November 2018 ballot that allows all communities in the County to benefit from meaningful, on-the-ground projects that provide multiple benefits to residents while not undermining existing legal safeguards for clean water in the region. We are most supportive of a comprehensive program that accomplishes the following objectives:

- The prioritization of multi-benefit projects that reduce water pollution and flood risks, enhance water supply, and provide other community benefits such as open space and habitat enhancement
- The prioritization and maximization of projects in DACs
- A credit and rebate program to ensure good actors are rewarded for their efforts
- The creation of and support for local workforce development programs
- Limits on the amount of funds that municipalities can use as "back-fill" (to fund pre-existing projects and programs)

While we believe the County has thus far created a fairly robust program, one aspect that appears lacking is an assurance that low and fixed-income taxpayers will not be presented with a tax that they simply cannot afford to pay. While the draft Program states that credit, rebate and incentive programs may be funded through the tax, the Supervisors should ensure that affordability is explicitly accounted for in the Ordinance and Program Elements. This can be done by discounting the tax for low-income or fixed-income persons to the extent necessary to ensure that they are able to afford the tax, taking into account other essential costs of living.

Thank you again for your work on the Safe, Clean Water Program, a program that has the potential to help address the region's biggest water pollution problem while providing many other benefits to communities through the County. We look forward to working with the County to ensure the creation and passage of a robust program.

Sincerely,



Corinne Bell
California Water Policy Analyst

CC: Katy Young, Office of Supervisor Sheila Kuehl
Teresa Villegas, Office of Supervisor Hilda Solis
Russ Bryden, Los Angeles County Department of Public Works
Leslie Friedman Johnson, Conservation and Natural Resources Group