



LOS ANGELES COUNTY

Strengthening the Voice of Business Since 2008

BizFed's Member Alliance

Action Apartment Association
AIA - Los Angeles
Airlines for America
Alhambra Chamber
American Beverage Association
American Hotel & Lodging Association
Antelope Valley Board of Trade
Apartment Association, California Southern Cities
Apartment Association of Greater Los Angeles
Arcadia Association of Realtors
Asian American Business Women Association
Asian Business Association
Association of Independent Commercial Producers
Azusa Chamber
Beverly Hills Chamber
Beverly Hills / Greater LA Association of Realtors
BNA SUCCESS
Burbank Association of Realtors
Building Industry Association, LA / Ventura Counties
Building Owners & Managers Association, Greater LA
Business & Industry Council for Emergency Planning & Preparedness
CalAsian Chamber
California Apartment Association, Los Angeles
California Asphalt Pavement Association
California Business Roundtable
California Cannabis Industry Association
California Construction Industry and Materials Association
California Contract Cities Association
California Employers Association
California Fashion Association
California Grocers Association
California Hotel & Lodging Association
California Independent Oil Marketers
California Independent Petroleum Association
California Life Sciences Association
California Metals Coalition
California Restaurant Association
California Small Business Alliance
California Sportfishing League
California Trucking Association
CALInnovates
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
CDC Small Business Finance
Central City Association
Century City Chamber of Commerce
Cerritos Chamber
Citrus Valley Association of Realtors
Construction Industry Air and Water Quality Coalitions
Consumer Healthcare Products Association
Council on Trade and Investment for Filipino Americans
Culver City Chamber
Downey Association of Realtors
Downtown Long Beach Alliance
Downtown Pomona Owners Association
El Monte/South El Monte Chamber
Employers Group
Engineering Contractor's Association
F.A.S.T. - Fixing Angelenos Stuck in Traffic
FilmLA
Foreign Trade Association
FuturePorts
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley ADR
Greater Lakewood Chamber
Greater Los Angeles African American Chamber
Greater Los Angeles New Dealers Association
Harbor Association of Industry and Commerce
Harbor Trucking Association
Hollywood Chamber
Hong Kong Trade Development Council
Hotel Association of Southern California
Hotel Association of Los Angeles
Independent Cities Association
Inglewood Manufacturers Council
Inglewood Airport Area Chamber
International Warehouse Logistics Association
Inglewood Airport Area Chamber
Investing in Place
Irvine Chamber
Japan Business Association of Southern California
LA Canada Filtridge Chamber
LA Media Lab
LAX Coastal Area Chamber
Leadership for Urban Renewal Network
League of California Cities
Local Search Association
Long Beach Area Chamber
Los Angeles Area Chamber
Los Angeles Black MBA Association
Los Angeles CleanTech Incubator
Los Angeles County Bicycle Coalition
Los Angeles County Board of Supervisors
Los Angeles County Waste Management Association
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay & Lesbian Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
Maple Business Council
Motion Picture Association of America
MoveLA
NAIFA - OC
NAIOP Southern California Chapter
National Association of Beverage Owners
National Association of Tobacco Outlets
National Association of Women Business Owners
National Association of Women Business Owners, LA
National Hispanic Medical Association
National Latina Business Women's Association
Netherlands-America Foundation
Orange County Business Council
Pacific Merchant Shipping Association
Pacific Palisades Chamber
Panorama City Chamber
Pasadena Chamber
Pasadena-Foothills Association of Realtors
PBRMA
Planned Parenthood Southern California Affiliates
Pomona Chamber
Rancho Southeast Association of Realtors
Recording Industry Association of America
Regional Black - San Fernando Valley Chamber
Regional San Gabriel Valley Chamber
Rosemead Chamber
Rotary Club of Los Angeles
San Gabriel Chamber
San Gabriel Valley Civic Alliance
San Gabriel Valley Economic Partnership
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
San Pedro Peninsula Chamber
Santa Monica Chamber
Santa Monica Junior Chamber
SCALE LA
Sherman Oaks Chamber of Commerce
South Bay Association of Chambers
South Bay Association of Realtors
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Minority Supplier Development Council Inc.
Southern California Water Committee
Southland Regional Association of Realtors
Torrance Area Chamber
Town Hall Los Angeles
Tri-Counties Association of Realtors
United Chambers San Fernando Valley
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
Valley Economic Alliance
Valley Economic Development Corp.
Valley Industry & Commerce Association
Vernon Chamber
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Los Angeles Chamber
West San Gabriel Valley Association
West Valley/Warner Center Chamber
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Westwood Village Rotary Club
Wilmington Chamber
World Trade Center
Young Professionals in Energy - LA Chapter

May 11, 2018

The Honorable Sheila J. Kuehl, Chair
Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple St.
Los Angeles, CA 90012

RE: Urge Significant Changes to the Safe, Clean Water Program and Straw-man Proposal

Dear Chair Kuehl and Supervisors:

We are writing on behalf of BizFed, the Los Angeles County Business Federation, an alliance of 176 business organizations representing over 390,000 employers with over 3.5 million employees in Los Angeles County. As a massive grassroots alliance, we advocate for policies that strengthen our regional economy. **We strongly urge the County of Los Angeles to incorporate the following recommendations into the Safe, Clean Water Program and straw-man proposal in order to garner our support.**

BizFed has been an active and ongoing participant in Los Angeles County's efforts to develop a stormwater fee or tax to support the water quality compliance requirements of the Los Angeles Regional Water Quality Control Board and its MS4 Permits, TMDLs, and Basin Plan. Being the voice of business, we have organized a broad coalition of property related businesses and municipal partners to serve as a resource in the development of the tax proposal and to analyze its impact on various types of property uses. Utilizing these vast resources, we have been providing comments and concerns regarding any tax or fee concepts. **Unfortunately, many of the issues that have been raised, remain. We feel there is a great deal of more work that needs to be done to develop an effective plan that we can support.**

In addition to our continued involvement, water agencies have submitted a White Paper intended to help guide the County to produce a final measure that is fiscally sound, transparent, and benefits all stakeholders. This white paper has identified a feasible approach to take advantage of available capacity in existing public infrastructure. Now that the POTW's have the legal authority, this approach could more cost effectively meet RWQCB stormwater quality standards, while producing significant quantities of new recycled water supplies by diverting dry weather flows to existing POTWs; diverting wet weather flows to existing POTWs, as feasible. These measures coupled with the recommendations below, we believe will bring about a better Safe, Clean Water program, without putting additional and overburdensome regulations and high taxes on the business community, while allowing Cities the ability to meet MS4 water quality requirements.

In order for BizFed and our partners to support your efforts, the County of Los Angeles **MUST** incorporate the below recommendations:

1. There needs to be a stormwater master plan for each of the watershed areas, including commitments to projects with costs, timelines and anticipated results, and projects included in Watershed Management Programs and Enhanced Watershed Management Programs that have been approved by the Regional Water Board should be included in these plans without the need for feasibility studies.
2. The current proposed tax methodology is unclear to the tax payers. Before the finalization of the measure, all property owners must be shown the precisely proposed tax per parcel to review and have comments duly considered by the County regarding the fairness of the tax.
3. The Board of Supervisors should ensure that these projects are incorporated into Programmatic EIR's to limit excessive CEQA litigation that delays implementation of voter approved public infrastructure.
4. Significant funding (\$5 Mil a year until the work is completed) should be allocated to developing a proper basin plan with appropriate science to back up the objectives.
5. A credit, rebate and/or exemption program needs to be created for those companies, residents and/or developers who have already complied on their property, ensuring they aren't double taxed. This program should be extended to include those cities that have already voted/enacted a compliance tax or fee program.
6. Project scoring criteria shall be set at; 50 points for water quality, 25 points for water supply, 10-13 points for community investment, and 12-15 points for leveraging as defined on the draft scoring sheet.
7. All survey/polling questions and full results of a public poll conducted between March 1 and March 13, 2018 by FM3 Research titled "Los Angeles County Stormwater Refinement Ballot" of which a summary already has been released on April 13, 2018.
8. Authority needs to be granted to create a credit trading program for flexible compliance.
9. The tax measure should include a "dusk clause" specifying a date when the tax measure will be reduced to a level to cover operations & maintenance, as well as the creation of a fund to pay for eventual project replacement.
10. This tax measure should include an annual ten-year review of the funds expended and cost related to ongoing maintenance in the purpose of reducing the overall tax revenue to cover ongoing maintenance. We ask the County to provide its best estimate of projected cost changes of infrastructure vs operations and maintenance over the next 30 years.
11. Ensure that this measure complies with the new law enacted from SB 231(Hertzberg).
12. Property owners shall have the right to allocate the full costs from this program to the end users as an additional rental surcharge.
13. The amount of funding brought in from this tax should not exceed \$300 million annually.
14. Authority needs to be granted to create a construction authority to build projects for regional jurisdictions without the capacity to manage and deliver on time and on budget.
15. A commitment from the Board to support the Auditors recommendations for the State and Regional Water Boards is needed.

16. Both the establishment ordinance and implementation ordinance need to be adopted at the same time by the Board of Supervisors on June 26, 2018.
17. Want a commitment from the Water Quality Control Board that if a tax is approved third party enforcement cannot be initiated without a finding by the Board that the jurisdiction is not acting in good faith or with due diligence. Ask the board to support this idea.
18. "Maintenance of effort" should be relabeled as backfilling.

As always, **BizFed is a committed partner and is willing to continue dialogue, provide feedback and commentary to help the County of Los Angeles to produce a measure that gets the job done. There needs to be significant changes to the current proposal for us to support the Stormwater ballot measure that our members (business community, municipalities, and water agencies) will pay exponentially more for than other stakeholders.**

If you have any questions, please contact BizFed's Advocacy Director, De'Andre Valencia at DeAndre.Valencia@BizFed.Org

Sincerely,



Hilary Norton
BizFed Chair
F.A.S.T



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
Impower, Inc.

CC: Supervisor Hilda Solis
Supervisor Mark Ridley-Thomas
Supervisor Janice Hahn
Supervisor Kathryn Barger