



June 18, 2018

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

RE: Parcel Tax Credit Program is Unacceptable for Businesses with Storm Water Permits

Dear Chair Kuehl:

Carlton Forge Works was established in 1929 and currently operates in the city of Paramount. We employ 400 employees with high-paying wages and benefits.

On November 19, 1991, the California SWRCB, under EPA authority, approved a general permit for California facilities with “storm water discharges associated with industrial activity.” As a facility that falls under this permit, we are required to reduce or prevent storm water pollutant discharge.

The state’s storm water program has cost our company over \$250,000. And on an annual basis, we invest \$5,000-\$20,000/year to adhere to a strict BMP program, collect and file storm water samples, upgrade the facility under our SWPPP, pay storm water permit fees, and dedicate employee time to storm water tasks.

Our facility is already subject to enforcement, fees and fines for storm water. The State Water Board and Regional Water Board have authority over our storm water activities. Most cities have their own storm water permits, and are required to check industrial facilities in their jurisdiction. SB 485 was signed into law in 2013 and requires weights and measures to check for storm water permits at metal facilities with a Weightmaster scale. And third party lawsuits from private attorneys are an ongoing risk to sites with storm water permits.

It is unfair for the County of Los Angeles to impose a new tax on companies that already participate—and invest—in storm water pollution reduction. **Until a full credit is given to parcel owners with a storm water permit, our company opposes the *Safe, Clean Water Ordinance and Program*.**

Sincerely,

Luc Ong
EHS Manager