

June 14, 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:

75S Corp DBA FMC Metals was established in 2008 and currently operates in the city of Los Angeles. We employ 26 employees with high-paying wages and benefits. Our lowest paid employee makes \$13.50 per hour and highest paid hourly employee makes \$22.50 per hour. Every employee has health insurance, vacation and retirement 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.

FMC Metals has already spent \$150,000 to comply with the demands of the storm water board and takes pride in not being a polluter despite seeing every other non scrap business in my area do nothing to prevent storm water pollution. 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 goal is by the end of 2019 to be a zero discharge facility.

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 Weighmaster 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,



Kevin Armstrong
FMC Metals
President