

June 15, 2018

To: Hon. Sheila Kuehl, Chair, Los Angeles County Board of Supervisors
Hon. Janice Hahn, Chair Pro Tem, Los Angeles County Board of Supervisors
Hon. Hilda 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 Pastrella, Director of Public Works, Los Angeles County

## Re: Safe, Clean Water Program

Dear Honorable Chairwoman Kuehl, Supervisors, and Director Pastrella,

On behalf of Strategic Concepts in Organizing and Policy Education (SCOPE) and the hundreds of South Los Angeles residents who we engage and partner with in the fight for equitable investment in communities most affected by pollution and environmental hazards, we thank you for your work on developing elements for the Safe, Clean Water Program. We believe that clean, safe water is a basic human right, and that strategic public investment in sustainable water infrastructure can improve public health, equity and local environments, while providing local training and job opportunities.

Over the last few months, we have engaged community members and social justice ally organizations in the greater South Los Angeles area, to ground our recommendations in community priorities and principles, with the ultimate goal of identifying bottom lines for the Safe Clean Water Program (SCWP). On May 15, we submitted our initial recommendations along letters of support from South Los Angeles community members. While progress has been made, we respectfully submit this letter in response to the May 25th, 2018 version of the of the SCWP "Draft Program Elements" to reiterate our recommendations. We submit this letter on behalf of our grassroots members and key organizational allies with the intent to strengthen the Program's equity outcomes and deepen community support.

We ask you to consider the following list of issues identified by Supervisorial District 2 residents:

1. Community Engagement and Decision-Making: In order to ensure equitable investment and effective solutions for water infrastructure, we must include genuine community engagement and an equitable governance process. It is imperative that this program prioritizes sustained community engagement and builds community resilience. It is not enough to implement the traditional informational methods, but instead we recommend that this program is structured in such a way that the community is consulted in the development of creative stormwater projects that address the needs and priorities of local residents. For far too long, communities who bear the brunt of climate change and pollution impacts have been left out of decision making processes. Low-income residents, communities of color, children, seniors, and working families pay the price of inequitable environmental solutions and infrastructure with their health---and

often with their lives. For this reason, we recommend that social justice organizations and equity issue experts have a way to structurally represent these vulnerable communities in the Program's governance process and specifically in selection of local projects.

- 2. Public Sector O&M Jobs and Workforce Development for all SCWP-funded Projects: To ensure projects are operating at maximum efficiency and are accountable to the public, we recommend: (1) establishing a specialized public sector maintenance team, within the entities responsible for developing and implementing projects; (2) ensuring adequate funding for maintenance of projects; and (3) requiring that project planning require development and funding of public sector workforce pipeline programs into those maintenance careers. Publicly financed projects should be prioritized, with living wage, job guality, and reporting standards in public-private projects that comply with that of public projects. Public-private projects should prioritize integration of public sector maintenance teams or qualifying workforce programs into their maintenance plan. Additionally, existing targeted local hire policies and community workforce agreements should apply to projects funded through the Safe, Clean Water Program and be clearly referenced and defined in the Program Elements Document. Projects and programs funded by SCWP provide opportunities to support ongoing workforce development efforts- connecting residents to new jobs in a manner that is equitable and targeted to reach excluded and vulnerable workers. Our additional specific jobs and workforce recommendations include:
  - 1. Funding for Programs. Maintain funding for local workforce job training programs as eligible expenditures to ensure development of a projects that incorporate that aforementioned best practices, provide multiple benefits to local communities, and support a well-trained workforce in this growing area of the construction sector.
  - 2. Tracking Employment Impacts. Employment data in applications and evaluations should use certified payroll reporting systems and avoid generating estimates of employment using formulas of investment-to-employment ratios. Certified payroll reporting can provide the following jobs metrics while maintaining the confidentiality of individual workers: Job classification by trade or occupational category; Job classification by journey level or apprentice level; Rate of pay; Number of hours worked per week; Disadvantaged status, including zip code of residence; Race, ethnicity, and gender; and Certifications held.
  - 3. Clearly-Defined Training, Hiring, and Job Creation Policies and Metrics for all taxpayer funded projects and programs resulting from the Safe, Clean Water Program, especially connected to the development and implementation of nature-based solutions projects in existing Urban Water Management Plans and Enhanced Watershed Management Plans in the county, which could expand local municipal models that could sustain public sector jobs beyond public works. To ensure access to good public sector jobs as a benefit of program funding, including for operations and maintenance, additional direction is needed from the County and municipalities. Los Angeles County's construction career policies, such as Community Workforce Agreements that encourage local and disadvantaged worker hiring should apply to projects funded by this program. As we make large-scale investments in our regional water infrastructure using nature-based solutions, we must also see this as an opportunity to invest in good, green careerpath training and jobs opportunities.
  - **4.** Develop a Scoring Process that Prioritizes Job Creation and Training Benefits. Ensure the scoring process prioritizes funding for strong, competitive projects and programs that

include best practices and raise the floor on capital infrastructure investment across the region. Best practices may include, but are not limited to, those derived from workforce training models that have a proven track record for job placement, paid training, and targeted enrollment/hiring for individuals with barriers to employment.

**3. Progressive Parcel Tax Structure:** Progressive parcel tax structure that includes protections to limit the tax burden on low-income residents, such as a discount program, a cap for medium to small residential parcels, or rebates for small multi-family units.

Thank you for this opportunity to comment on the proposed Safe, Clean Water Program Elements, and thank you again for your work to address the critical issue of stormwater pollution and environmental sustainability in Los Angeles County. We look forward to working with the County to ensure the creation of an equitable Program.

Sincerely,

Gloria Walton President & CEO Strategic Concepts in Organizing & Policy Education