



June 15, 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 Pastrella, Director of Public Works, Los Angeles County

Re: Draft Safe, Clean Water Credit Program

Dear Honorable Chairwoman Kuehl, Supervisors, and Director Pastrella:

The Natural Resources Defense Council (NRDC) would like to thank you for your diligent work to develop elements for the Safe, Clean Water Program, a program that is crucial to help the County address the biggest source of water pollution in the region, stormwater pollution. We truly appreciate the County's efforts to create a program that balances all interests, including striving to fund projects that have multiple benefits to communities throughout Los Angeles County. We believe that it is vital that the County encourage and credit properties that treat stormwater on-site, and we submit the following comments on the Credit Program in addition to our comments on the Draft Program Elements.

- 1) The Credit Program should not be limited to large sites (>50 acres). Credit should be given to smaller properties either via the Credit Program or the Incentive Program.

In the event the Credit Program is expanded to include smaller sites, the requirement for certification by a civil engineer should be reconsidered in this context. Projects on smaller parcels will still need to be verified, but this could be done by the municipality, for example.

- 2) The County should provide support for the 65% credit maximum. The percentage credit offered must find the balance between creating proper incentive for parcel owner action and collecting enough revenue for a robust Program.

Thank you for this opportunity to comment on the proposed Safe, Clean Water Credit Program, and thank you again for your work to address the critical issue of stormwater pollution in Los

Angeles County. We look forward to working with the County to ensure the creation of a robust Program.

Sincerely,

Corinne Bell
California Water Policy Analyst