September 6, 2019

Department of Public Works
County of Los Angeles
500 West Temple St
Los Angeles, CA 90012

SUBJECT: Safe, Clean Water Program Supplemental Document Comments

The Los Angeles Area Chamber of Commerce (Chamber) is committed to the successful implementation of LA County’s Measure W. To assure the Chamber can bring the perspectives and experience of businesses throughout the County, large and small, and with a diverse set of business enterprises and real property holdings, we convened a group of Chamber members whose expertise could be helpful to the County throughout the implementation process. We appreciate the incorporation of a number of our thoughts in the implementation documents earlier this summer.

We’d like to additionally comment specifically on the Credit Program Implementation Procedures and Guidelines, as posted on August 8th. The Chamber believes there must be a viable path to receive 100 percent credit against the Safe Clean Water (SCW) Program’s parcel tax for parcel owners and developers of Benefited Developments taking actions above and beyond applicable storm water management requirements.

We also believe there must be appropriately incentivized activities that advance the goals of the SCW Program with private investments. These concepts were important considerations when the Board of Supervisors placed the measure on the ballot and when the voters adopted the measure last November. We are concerned that the “gating” mechanisms in the draft Guidelines disincentivize private landowners and developers from taking actions and making investments advancing the important goals of the SCW Program.

To facilitate these action and investments, we recommend the following revisions to the draft Guidelines:

- **Community Investment Credit:** The guidance should allow, as an alternative to calculating “Community Investment Credit” based on the number of distinct “Community Investment Benefits”, for Community Investment Credit to be credited on a dollar-for-dollar expenditure match, up to 10 percent of “Special Parcel Tax”, so long as the applicant demonstrates that the expenditure results in one or more defined Community Investment Benefits. Again, both options (number of benefits or dollar-for-dollar) should be available to the applicant.

- **Additional Activities Credit:** The County should not limit the availability of the “Additional Activities Credit” to only those parcels that qualify for 65 percent “Sub-Credit Total” and 6 percent Community Investment Credit; instead, the Additional Activities Credit should be available for all parcel owners or Benefited Developments willing to make investments in those additional activities (both on- and off-site) that advance the goals of the SCW Program. The Additional Activities Credit should also incentivize financial participation in regional benefit projects and facilitate the pooling of resources.
Thank you again for taking the time to consider our comments on the implementation ordinance and related documents. If you have any questions or would like to discuss further with our Task Force, please contact me at jduboff@lachamber.com or 213.580.7585.

Sincerely,

Jessica Duboff
Vice President, Public Policy