



CALIFORNIA METALS COALITION

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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 Unfair and Unacceptable for Those with Storm Water Permits

Dear Chair Kuehl:

The metalworking industry in Los Angeles County accounts for over 100,000 jobs, \$7 billion in annual wages, and \$26 billion in annual economic activity.

8 out of 10 employees in the metalworking sector are considered ethnic minorities or reside in disadvantaged communities. Workers in the metalworking sector receive an average salary of \$66,400/year in wages and benefits. A job in the metals sector is often the only path to the middle class for many of these Californians.

California's advanced metal manufacturers use recycled metal (ex: aluminum, brass, iron and steel) to make parts for the aerospace industry, clean energy technologies, electric cars, biotech apparatuses, medical devices, national defense items, agriculture, infrastructure, construction machinery, food processing and storage, movement of water, and millions of other products demanded by society.

All metalworking facilities in Los Angeles County are subject to the requirements of the storm water Industrial General Permit (IGP). Under the IGP, metal companies are regulated for storm water by the State Water Board, Los Angeles Regional Water Board, and local cities within Los Angeles County.

As parcel owners in Los Angeles County, metal companies have collectively spent millions of dollars to reduce pollutants, upgrade facilities, collect and report samples, and respond to any enforcement by government entities within Los Angeles County. **It is unfair and unacceptable for metal facilities with storm water permits to now pay a new storm water tax.** The city of Los Angeles already has fees or assessments on our facilities. Adding a new tax means many will be **triple taxed**.

It is equally unfortunate that Los Angeles County does not acknowledge the hard work, financial investments, and ongoing dedication of those companies with storm water permits.

Until facilities with a storm water permit receive a full credit for their ongoing contribution to storm water solutions, we will be strongly opposed to the Safe, Clean Water Program Ordinance and Program.

Thank you for your time, and for allowing CMC to participate and comment. We look forward to continued discussions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Simonelli', with a stylized flourish extending to the right.

James Simonelli
Executive Director

cc: Rachel Roque: rroque@CNRGCalifornia.com
Katy Young: kyoung@bos.lacounty.gov
Los Angeles Regional Water Quality Control Board