



Public Comment Form

Name:* Shahriar Eftekhazadeh Organization*: SEITec
Email*: Shahriar.Eftekhazadeh@seitecinc.com Phone*: 310 879 9376
Meeting: Scoring Committee Date: 01/27/2021

LA County Public Works may contact me for clarification about my comments

*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

Comments

Subsequent to the Scoring Committee's scoring the **Portuguese Bend Landslide Complex Mitigation Project**, SEITec is providing the following technical review comments as a public service and for Scoring Committee's reconsideration of the project.

The Project is essentially a landslide stabilization project, submitted as a stormwater project for funding purposes. It does NOT provide any significant water quality benefits and should not be funded by SCW Program funds in its current form. Below are specific reasons:

1. Project description claims primarily wet weather water quality benefits (with no supporting calculations), yet the project is submitted as a Dry Weather project.
2. The proposed BMPs are hugely oversized for the very small calculated dry weather flow of 0.119 cfs, and therefore result in highly inefficient design for the stated purpose.
3. Project is NOT included in any water management plan (neither the RVP EWMP, the Greater Los Angeles IRWMP OPTI).
4. The project proposed discharge of intercepted groundwater directly to the ocean requires a separate MS4 permit and likely treatment. There is no design provision for this requirement in the study.
5. RVP EWMP identifies intercepted groundwater by existing wells as nuisance groundwater. Therefore, unless the intercepted groundwater is treated, the proposed project exacerbates the water quality problem identified in RVP EWMP.
6. There are no calculations to support the claimed benefits as per the feasibility study guidelines.
7. There is no retention facility for holding the captured water to enable diversion to the County sewer line.
8. The County sewer line for diversion of captured water is a force main. Project requires detention and pump station facility for diversion, which is not included in the proposed project.
9. There is no design element or supporting calculations for the claimed 50-100 ac-ft/yr "treated flow to the sanitary sewer" as water supply benefits.
10. The requested funds for Design will primarily be spent on designing project elements that are for landslide stabilization and have nothing to do with MS4.

Therefore, the Scoring Committee should reevaluate and re-score the project in the light of the above.