



Public Comment Form

Name*: James Cluxton Organization*: OhanaVets, Inc.

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Meeting: LSGR WASC Date: 10/11/2025

☒ 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

This submission accompanies a full written Public Comment letter from OhanaVets, Inc. regarding the July 8, 2025 Lower San Gabriel River (LSGR) Watershed Area Steering Committee (WASC) selection process and related transparency, procedural, and conflict-of-interest concerns.

Due to character limitations in this form, the complete comment letter is provided as a separate PDF attachment titled "OhanaVets_PublicComment_LSGR_WASC_Oct11.pdf."

The attached letter should be entered in full into the official public record for both the LSGR WASC and the Regional Oversight Committee (ROC), and distributed to all relevant members and County staff prior to the next meeting.

Submitted respectfully by:
James Cluxton
President, OhanaVets, Inc.
Certified DVBE Contractor under RFSQ BRC0000529
jim@ohanavets.com



Public Comment Submission – LSGR WASC

October 11, 2025

VIA EMAIL

To: LSGR Watershed Area Steering Committee (WASC)
Los Angeles County Public Works
900 S. Fremont Ave
Alhambra, CA 91803
Email: SafeCleanWaterLA@pw.lacounty.gov

Subject: Public Comment – Enhancing Transparency, Fairness, and Accountability in the LSGR Watershed Coordinator Selection Process

Dear WASC Chair and Committee Members,

On behalf of OhanaVets, Inc., a certified Disabled Veteran Business Enterprise (DVBE) and current Lower San Gabriel River (LSGR) Watershed Coordinator, I respectfully submit this comment to reaffirm our commitment to transparency, equity, and accountability within the Safe Clean Water Program (SCWP).

OhanaVets has served Los Angeles County with professionalism and consistency, delivering measurable environmental, educational, and community outcomes across multiple watersheds. As a veteran-led enterprise, we deeply value the County's leadership in fostering diversity and inclusion through DVBE participation—ensuring that veteran-owned firms contribute to sustainable public programs that benefit all communities.

However, transparency and procedural consistency—core requirements of both the Ralph M. Brown Act (Gov. Code §§ 54950 et seq.) and the SCWP RFSQ—were not upheld during the July 8, 2025 LSGR WASC selection meeting, where a combination of procedural errors, unresolved conflicts, and record-keeping gaps compromised public confidence in the process.

Background and Administrative Efforts

OhanaVets pursued all available administrative channels to address these issues in good faith:

- Public Records Act Requests: PRA Nos. 6507 and 6523 were submitted to the Los Angeles County Public Records Division but returned incomplete—omitting conflict-of-interest disclosures, Evaluation and Selection Reports (ESRs), DVBE scoring documentation, and any policy authorizing proposer exclusion.
- Proposed Contractor Selection Review (PCSR): Filed with Los Angeles County Public Works (DPW) under RFSQ § 5.G, which allows review before Board award when no filing deadline exists (the August 4 non-selection notice listed none). DPW's

October 6 response dismissed it as “non-protestable,” leaving no administrative path for correction.

- Cure and Correct Demand: A formal Brown Act Cure and Correct Demand (Gov. Code § 54960.1) has since been submitted to the WASC and County Counsel to remedy violations and ensure future compliance.

Factual Record and Observations

The official July 8, 2025 Webex recording (released September 11, 2025 under PRA 6523) documents several serious inconsistencies, including:

- Improper Exclusion of Proposers: At 19:56, DPW staff—not the WASC—directed all proposers to leave prior to deliberations and through the second public comment period (≈ 2:17–2:20), contrary to Gov. Code § 54953(a). PRA 6507 confirmed no County policy authorizes this practice, revealing a significant procedural failure.
- Unequal Timing and Questioning: OhanaVets’ 10-minute Q&A included a 2-minute introduction (44:10–46:00), while other proposers gave introductions before their timers started (≈ 50:15 and 1:15:18–1:17:14). After Dudek’s timer expired (1:42:22), the Chair acknowledged time was up but posed another question, granting roughly two additional minutes of unsanctioned response time—violating RFSQ uniformity requirements.
- Unresolved Conflict of Interest: Dudek disclosed an active partnership with Craftwater (1:26:50), a firm already engaged in SCWP technical support. DPW staff acknowledged the conflict was “flagged” and would be referred to County Counsel if selected (1:34:43), yet no legal review occurred prior to voting (1:48:50), contrary to Gov. Code § 1090 and PW-18.
- Disparaging and Unverified Remarks: At 2:08:09 and 2:10:58, WASC members made inaccurate, unsubstantiated, and negative hearsay-based remarks about OhanaVets’ performance and participation—without factual basis, corroboration, or correction from the Chair. Such comments created an appearance of bias and prejudice in a quasi-procurement setting, undermining Gov. Code § 54953’s requirement for fair and impartial deliberation.
- Imbalanced Public Comment: At 2:19:20, during a DPW-managed second public comment period—while proposers were excluded—an administrator from the Pasadena Stormwater Division (also serving in ULAR and Rio Hondo WASC leadership) provided a direct endorsement of Dudek, citing prior collaboration. This unequal access to advocacy not only contravened Gov. Code § 54954.3 but also damaged the integrity of the decision-making process by allowing influence from parties with existing programmatic relationships outside the scope of the meeting.
- Transcript Errors: Material misattributions and omissions in the official transcript compromise Gov. Code § 54957.5 compliance and further obscure the public record.



Conclusion and Request

Taken together, these procedural and ethical deficiencies significantly impacted the fairness of the selection process and disadvantaged Disabled Veteran Business Enterprises (DVBEs), undermining public confidence in the County's procurement integrity.

OhanaVets respectfully requests that the WASC formally review the July 8 meeting procedures, release all withheld documentation (ESRs, DVBE scoring, PW-18 disclosures, and conflict reviews), and adopt clear protocols to ensure consistent and equitable treatment of all proposers in future SCWP phases.

Please include this letter in the official record and distribute to all WASC members prior to the next meeting.

Respectfully submitted,

A handwritten signature in black ink that reads 'James Cluxton' in a cursive script.

James Cluxton
President, OhanaVets, Inc.
jim@ohanavets.com