



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
44.		Other	James Cluxton	Public Comment – Agenda Item 44 (November 4, 2025) Safe Clean Water Program (SCWP) – Watershed Coordinator Contracts (Lower San Gabriel River Watershed) To the Honorable Members of the Los Angeles County Board of Supervisors, My name is Jim Cluxton, President of OhanaVets, a Disabled Veteran-Owned Small Business (DVBE) and the incumbent Watershed Coordinator for the Lower San Gabriel River (LSGR) Watershed. We submit this comment regarding Agenda Item 44, addressing major procedural, transparency, and equity issues surrounding the July 8, 2025 WASC selection of the next LSGR Watershed Coordinator. Transparency and PRA Non-Compliance: Since August, OhanaVets has submitted multiple Public Records Act (PRA) requests related to the July 8 selection meeting. Despite County acknowledgment that responsive materials exist, several key categories remain unanswered or withheld—including scoring data, conflict disclosures, and internal correspondence. No production index or timeline has been provided, resulting in incomplete compliance and procedural stalling that undermines public transparency. Brown Act and Open Meeting Concerns: All proposers were directed to leave before deliberations, despite no lawful exemption under the Brown Act. This exclusion, combined with missing transcript portions and inaccurate speaker listings, creates a deficient record and raises questions about the validity of the proceeding. Conflict of Interest: A potential conflict of interest between Dudek (the selected firm) and Craftwater—a County consultant performing SCWP-funded work in the same watershed—was acknowledged during the July 8 meeting. Staff stated the issue was “flagged” and that County Counsel would review it if Dudek were selected. To date, no legal opinion or disclosure has been produced, leaving unresolved concerns about access to non-public information and fairness in evaluation. Unequal Treatment and Bias: One proposer was granted extra presentation time after the Chair acknowledged their time had expired; no other proposer was given similar accommodation. In addition, members affiliated with other SCWP watersheds made negative, untrue, or unsubstantiated remarks about OhanaVets while praising competing firms with which their agencies maintain relationships.

As of: 11/2/2025 9:00:10 PM

				This contradicts SCWP's conflict-of-interest provisions and undermines public confidence. DVBE Equity and Service: OhanaVets is the only DVBE participating in the SCWP Watershed Coordinator program. As a veteran-owned firm, we have served the program faithfully and collaboratively since its inception, facilitating community engagement, advancing project readiness, and promoting regional equity. Our exclusion under these irregular circumstances runs counter to Los Angeles County's commitments to equity, inclusion, and veteran small-business participation. Requested Board Actions: 1. Direct Public Works to release all outstanding PRA materials, including conflict-of-interest documentation, with a production index. 2. Refer the July 8, 2025 LSGR WASC proceeding for independent Brown Act and SCWP guideline review. 3. Obtain a written County Counsel opinion on the Dudek–Craftwater conflict issue. 4. Suspend new contract execution until these matters are fully reviewed and resolved. 5. Extend OhanaVets' current contract to maintain program continuity during this review 6. Reaffirm the County's commitment to transparency and inclusion, particularly for DVBE firms that have already demonstrated effective service under the program. The July 8 process lacked transparency, fairness, and consistency. OhanaVets has served this program with integrity and professionalism, and we respectfully urge the Board to pause the contract award until these issues are fully addressed. A full supporting letter expanding on these points has been uploaded for the record. Respectfully, James Cluxton President, OhanaVets – DVBE jim@ohanavets.com
		Item Total	1	
Grand Total			1	



To the Honorable Members of the Los Angeles County Board of Supervisors

Subject: Public Comment – Agenda Item 44 (November 4, 2025)

Safe Clean Water Program (SCWP) – Watershed Coordinator Contracts (Lower San Gabriel River Watershed)

Dear Chair and Members of the Board,

My name is Jim Cluxton, President of OhanaVets, a Disabled Veteran-Owned Small Business (DVBE) and the incumbent Watershed Coordinator (WC) for the Lower San Gabriel River (LSGR) Watershed under the Safe Clean Water Program (SCWP).

We submit this comment regarding Agenda Item 44, addressing procedural irregularities, transparency failures, and conflict-of-interest concerns related to the July 8, 2025 LSGR WASC vote and the subsequent Watershed Coordinator selection for the 2026–2031 term.

1. Lack of Transparency and PRA Noncompliance

Since early August 2025, OhanaVets has submitted multiple Public Records Act (PRA) requests (Nos. 6507 and 6523, with follow-up clarifications) seeking basic documentation tied to the LSGR WASC’s July 8 selection meeting. To date, several key categories remain unanswered or were deferred without a valid exemption, including:

- Scoring sheets and evaluation matrices used to rank proposers
- Conflict-of-interest disclosures and team arrangement forms
- Internal correspondence and evaluation summaries supporting the recommended selection
- The Evaluation and Selection Report (ESR), withheld pending “Board Agenda posting,” though no timeline was provided.

Despite multiple follow-ups, the County has not provided a production index or rolling updates, effectively suspending access to public information for more than two months. This delay has prevented a full and timely understanding of how the final recommendation was developed, directly undermining the transparency that the SCWP promises to the public.

2. Brown Act Compliance and Exclusion of Proposers

During the July 8 LSGR WASC meeting, all proposers, including OhanaVets, were instructed to leave the meeting prior to deliberations and voting, without any legal justification or exemption cited.

The Brown Act (Gov. Code § 54953–54957) requires open deliberations except under narrowly defined exceptions. Nothing in the Act or in SCWP guidelines authorizes exclusion of non-voting participants from observing open discussion.

The County’s own meeting transcript misrepresents speakers, omits key portions of deliberation, and lists a single speaker (a public commenter) for nearly the entire final hour, suggesting a deficient and unreliable record of what occurred. Such omissions jeopardize the integrity of the administrative record and could invalidate subsequent actions.

3. Conflict of Interest: Dudek and Craftwater

A central issue during the July 8 meeting was the acknowledged potential conflict of interest between Dudek (a proposer) and Craftwater, a firm that conducts SCWP-funded technical studies within the same watershed area. During the meeting, County staff publicly stated that the matter had been “flagged” and that they would “check with County Counsel if Dudek were selected.” No follow-up disclosure or legal determination has been provided since.

Further, Dudek’s presentation confirmed it had partnered with Craftwater on SCWP-related projects, and at least one team member previously worked on Craftwater’s analytical platforms. This overlap raises legitimate concerns regarding access to non-public data, analytical models, and evaluation influence.

The conflict was neither disclosed in the County’s response to PRA 6507 (marked “N/A”) nor addressed by the WASC during deliberation. This omission contradicts SCWP’s stated commitment to transparency and fair competition.

4. Unequal Treatment and Bias

OhanaVets was not treated equitably during the evaluation process. Key disparities include:

- **Unequal Q&A Time:** One proposer was granted additional time after the Chair explicitly acknowledged that the 10-minute Q&A limit had expired. No such flexibility was extended to other proposers.
- **Negative and Unsubstantiated Remarks:** Several committee members, who simultaneously serve as co-chairs of other SCWP Watershed Committees, made negative, untrue, or unsubstantiated comments about OhanaVets’ performance, comparing us unfavorably to coordinators in their own watersheds.

These comparisons lacked factual basis and were unsupported by any County performance data.

- Chair Inaction: The meeting chair did not correct or contextualize these remarks, despite the risk of reputational bias influencing the outcome.

Such conduct creates the perception of a pre-determined result and contradicts SCWP's evaluation principles emphasizing fairness, inclusivity, and objectivity.

5. Improper Insider Advocacy

During the public comment period, a sitting Watershed Chair from another SCWP area (Rio Hondo WASC) spoke in direct support of Dudek. She identified herself in her official SCWP capacity and cited ongoing collaboration with the firm, including joint projects and public presentations. This statement was allowed while all proposers, including OhanaVets, remained excluded from the session.

The use of one's SCWP leadership position to advocate for a proposer in another watershed constitutes improper insider advocacy and erodes public trust in an impartial selection process.

6. Procedural Irregularities and County Oversight Ambiguity

Throughout the July 8 process, County staff presented slides stating that "final decisions and any necessary adjustments remain at the discretion of Public Works." However, subsequent PRA responses claimed that "Public Works does not select the Watershed Coordinator." These two statements are irreconcilable.

Moreover, non-selection letters were issued to proposers before the WASC had approved its July 8 minutes, implying that final outcomes were determined administratively prior to the public record's certification. This sequence raises serious questions about procedural compliance and oversight integrity.

7. DVBE Equity and Public Confidence

OhanaVets is the only Disabled Veteran Business Enterprise (DVBE) participating in the Watershed Coordinator program across all SCWP watersheds. The loss of our position under these conditions sends a damaging message to the veteran business community,

that even a high-performing incumbent can be sidelined without transparency or accountability.

The County's Equity in Contracting policies emphasize inclusion, fairness, and opportunity for small and veteran-owned businesses. Our exclusion under procedurally defective circumstances undermines these commitments and diminishes public confidence in Los Angeles County's procurement practices.

8. Requested Board Actions

In light of the numerous procedural irregularities outlined above, and the County's continued lack of substantive response to our formal correspondence, including the Proposed Contractor Selection Review (PCSR) submitted on September 19, 2025, and our Cure-and-Correct Letter delivered to the LSGR WASC on October 9, 2025, we must respectfully escalate these matters to the Board.

Both documents identified specific governance and compliance issues and requested corrective action within statutory timelines. To date, neither Public Works nor the WASC has provided a written acknowledgement of corrective steps, legal review, or any plan to address the procedural deficiencies. As such, we now formally request that the Board exercise its oversight authority and take the following actions:

1. Direct Public Works to release all outstanding PRA materials from Requests 6507 and 6523, including conflict-of-interest documentation, with an itemized production index
2. Refer the July 8, 2025 WASC proceeding for independent legal review under the Brown Act and SCWP operating guidelines
3. Request a written opinion from County Counsel clarifying whether the Dudek–Craftwater partnership constitutes a conflict of interest under applicable SCWP, procurement, and ethics standards
4. Suspend contract execution for the LSGR Watershed Coordinator position until these matters are fully resolved
5. Extend OhanaVets' current contract to maintain program continuity during this review
6. Reaffirm the County's commitment to equity and transparency, particularly for DVBE and small-business participants



9. Closing Statement

The Safe Clean Water Program was created to serve Los Angeles County residents with accountability, transparency, and fairness. The irregularities surrounding the LSGR Watershed Coordinator selection, including procedural inconsistencies, undisclosed conflicts, and unequal treatment, violate those principles.

OhanaVets has served this program faithfully, engaging communities, coordinating technical partners, and advancing the County's environmental and resilience goals. We respectfully ask the Board to act decisively to restore integrity to the process and confidence in the SCWP's governance.

Respectfully,

A handwritten signature in black ink that reads "James Cluxton".

James Cluxton

President, OhanaVets – Disabled Veteran Business Enterprise (DVBE)

jim@ohanavets.com