

July 20, 2021

Juvenile Justice Realignment  
Block Grant Subcommittee  
9050 East Imperial Highway  
Downey, CA 90242

Subject: Comments on Proposed Annual Plan and Opposition that Camps Scott and Scudder Serve as Long Term Facilities for DJJ Population

Dear Chair Nichols and Members of the Juvenile Justice Realignment Block Grant Subcommittee:

On behalf of the Santa Clarita City Council, I am writing to respectfully express our concerns and opposition to your recommendation to the Los Angeles County Board of Supervisors (BOS) that Camps Joseph Scott (Scott) and Kenyon Scudder (Scudder) serve as the long-term County facility for male Division of Juvenile Justice (DJJ) youth and urge you to consider environmental impacts and conduct community engagement meetings with officials and community members in Santa Clarita.

Additionally, due to the concerning factors highlighted in this letter, we urge the Juvenile Justice Realignment Block Grant Subcommittee (Subcommittee) to identify alternative facilities suitable to serve the intended DJJ population.

The Santa Clarita City Council voted unanimously to oppose the DJJ recommendation regarding Camps Scott and Scudder at the regular meeting on June 22, 2021, after receiving extensive public input from members of the community and youth justice reform advocates.

Camps Scott and Scudder are located in the City of Santa Clarita (City) on Bouquet Canyon Road, approximately six-hundred feet from existing housing tracts north and south of the facilities. Furthermore, the City Council approved a 375-unit residential project on November 10, 2020, located approximately 700 feet east of the Camps. The residential project, known as Bouquet Canyon Residential, includes dedicated public open space, public trails, recreation areas, public parks, and roadway improvements and realignment of Bouquet Canyon Road, as shown in the attached map. At no time during the public approval process did the Subcommittee reach out or inquire about the potential development near a juvenile correctional facility.

As established in the approved motion on February 9, 2021, the Subcommittee was directed to consult with local justice, health, community, and other “relevant stakeholders,” in developing the County DJJ Plan. However, the City and members of the Santa Clarita community were never notified or invited to any meetings held by the Subcommittee or consulted with regard to the Subcommittee’s recommendations included in the proposed DJJ Plan. City officials were informed of the recommendations regarding Camps Scott and Scudder through word of mouth from community members on social media platforms, after the DJJ Plan was completed and distributed to the BOS.

Although we appreciate the public meeting scheduled on July 21, 2021, this does not negate the fact that the DJJ Plan was developed and proposed to the BOS without a single public meeting and without any input from officials and members of the Santa Clarita community.

The lack of transparency in the past year is a grave lapse in judgement and detrimental to the public trust and confidence that the DJJ Plan was developed with adequate consideration and understanding of the suitability of Camps Scott and Scudder.

Furthermore, the approved motion on February 9, 2021, directed the Subcommittee to consider and incorporate, where appropriate, the Youth Justice Work Group’s recommendations, including those from the report titled, “Youth Justice Reimagined: Recommendations of the Youth Justice Work Group DJJ Transition Team,” (Youth Justice Reimagined Report) in developing the recommendations included in the DJJ Plan. The Youth Justice Reimagined Report, released in December 2020, does not make one mention of Camps Scott and Scudder.

However, the Youth Justice Reimagined Report does dedicate significant analysis and consideration to other existing juvenile facilities that could potentially be used for the intended DJJ population. Ultimately, the Youth Justice Reimagined Report recommends a plan for, “immediate repurposing of Campus Kilpatrick to serve as a first Secure Alternative to DJJ by July 2021,” and, “if deemed necessary, Camp Gonzales by February 2022.” The Youth Justice Reimagined Report cites that the DJJ Transition Team agreed to focus on Campus Kilpatrick and Camps Gonzales and Kirby as the most suitable facilities for the DJJ population, citing security, capacity for vocational and educational training, and a therapeutic environment, as factors that contributed to their decision to only focus on these three facilities. Furthermore, the Youth Justice Reimagined Report states that the Youth Justice Work Group agreed that, “for Secure Alternatives to DJJ, the perimeter must be secure, but beyond that, the space inside should allow for considerable freedom of

movement,” citing, “remoteness from communities,” as an ideal factor in achieving the aforementioned concept.

In a report, subsequently issued by the Los Angeles County Sheriff’s Department following the release of the proposed DJJ Plan, Camps Scott and Scudder are described as unsuitable facilities that, “could not safely house the intended DJJ population.” Additionally, the report indicates notable concerns for the safety of the surrounding communities and of the youth housed in the facilities, citing the facilities close proximity to public access on Bouquet Canyon Road and lack of existing secure perimeter infrastructure which results in significant vulnerabilities to smuggled contraband, including weapons and narcotics.

As such, upgrades to security fencing and other physical barriers to Camps Scott and Scudder, due to their close proximity to existing and future communities and to ensure the safety of those housed in the facilities, would create an institutionalized and prison-like setting, contrary to the recommendations made in the Youth Justice Reimagined Report for a “therapeutic and healing environment.”

Moreover, Camps Scott and Scudder are located within High-Risk Area Flood Zones as established by the Federal Emergency Management Agency and High-Fire Hazard Severity Zones as established by the California Office of the State Fire Marshal. Surrounded by dry vegetation and hilly terrain on three sides of the facilities, Camps Scott and Scudder are significantly prone to natural disasters, including wildfires. Several wildfires have occurred near the facilities, including the Martindale Fire and Texas Fire, which occurred in August and September of last year. This concern was shared by the Los Angeles County Sheriff’s Department in their report submitted to the BOS, last month. Had a proper environmental document been performed, many of these issues would have surfaced as part of a larger analysis of the appropriate use of this location and would clearly indicate that Camps Scott and Scudder are unsafe and unsuitable for the proposed use included in the DJJ Plan.

The Youth Justice Reimagined Report states that many of the youth within the DJJ population have experienced the greatest level of trauma, abuse, and hardships, which requires a secure facility but with a therapeutic environment to promote a non-institutionalized setting for youth to adequately and efficiently rehabilitate. As you know, Campus Kilpatrick was recently renovated in 2017 with over \$45 million in investments to the security and implementation of the “LA Model,” focusing on promoting a therapeutic and care first environment. Campus Kilpatrick, similar to Camp Gonzales, is located in a remote setting, surrounded by mountainous terrain and allows for significant freedom of movement and a non-institutionalized setting.

Juvenile Justice Realignment  
Block Grant Subcommittee  
July 20, 2021  
Page 4

It is imperative that the DJJ Plan incorporate an environmental review and community input, especially from communities that will be directly impacted with the recommendations adopted in the DJJ Plan. Therefore, we respectfully urge the Subcommittee to consider environmental impacts and conduct community engagement meetings with officials and community members in Santa Clarita and identify alternative facilities suitable to serve the intended DJJ population.

A final plan is not due to the state until January 1, 2022, and it is critical that the Subcommittee utilize the balance of the remaining time, prior to the deadline, to ensure that the decisions made on the transition of DJJ youth is in the best interest of the youth served in the facilities and surrounding communities near the facilities.

Thank you for your consideration on this grave matter. We look forward to working with each of you in securing the most adequate resources and suitable facilities for the transition of the DJJ population. Should you require any additional information regarding our comments and requests included in this letter, please contact Masis Hagobian, Intergovernmental Relations Analyst, at (661) 286-4057 or [mhagobian@santa-clarita.com](mailto:mhagobian@santa-clarita.com).

Sincerely,

William A. Miranda  
Mayor

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cc: Members of the City Council  
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Los Angeles County Youth Justice Work Group  
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