



City of
SANTA CLARITA

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March 14, 2022

Laurene Weste
Mayor

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Jason Gibbs
Mayor Pro Tem

Subject: Opposition to Item 10 and Support to Designating Barry J. Nidorf as
a Permanent Secure Youth Treatment Facility

Marsha McLean
Councilmember

Dear Chair Mitchell and Members of the Los Angeles County Board of
Supervisors:

Bill Miranda
Councilmember

On behalf of the Santa Clarita City Council (City Council), I am writing to
respectfully oppose Item 10 on the agenda for the March 15, 2022, Board of
Supervisors Regular Meeting and support the designation of Barry J. Nidorf
as a permanent Secure Youth Treatment Facility (SYTF) to serve juvenile
males who would have otherwise been under the custody of the Division of
Juvenile Justice (DJJ).

Cameron Smyth
Councilmember

It has been nearly one year since the City Council voted to oppose a proposal
that would designate Camp Scott as an SYTF and our position remains that
Camp Scott is egregiously unsuitable to serve juvenile serious offenders
formerly under the custody of the DJJ.

The scorecard evaluation, which summarized the amenities and suitability of
all licensed probation facilities within the County, identified several facilities
that scored better than Camp Scott across many factors, including Barry J.
Nidorf Juvenile Hall, Camp Rockey, and Los Padrinos. However, despite
Camp Scott receiving the only red evaluation out of all of the facilities
assessed for "Resiliency Potential Fire/Flood Hazard," the original
recommendation by the Juvenile Justice Realignment Block Grant
Subcommittee (JJRBG) that Camp Scott serve as a permanent SYTF did not
change.



The inclusion of Camp Scott in the JJRBG recommendation and ultimately, in the recommendation made in Item 10, calls into question the integrity of the evaluation process and the County's commitment to ensure recommendations were made in the best interest of the youth served in the facilities and communities surrounding the facilities.

A facility that was built nearly 65 years ago, with limited renovations since its opening in 1958, Camp Scott's dilapidated conditions, historical use as a camp, and closure since March 2020 offers very little, if any, of the necessary amenities and infrastructure needed to adequately protect and rehabilitate juvenile serious offenders. Furthermore, the renovations required to Camp Scott are cost prohibitive, especially as there are other facilities that are more feasible due to their current conditions, use, and recently built or renovated infrastructure, including Barry J. Nidorf Juvenile Hall.

As the County is committed to reimagining Barry J. Nidorf Juvenile Hall while also lowering its juvenile justice footprint, designating Barry J. Nidorf Juvenile Hall as the permanent SYTF reflects the goals and intent of the County in investing in true reformatory rehabilitation programming and treatment at facilities that are in greatest need of reform. Furthermore, the County is already required to make significant enhancements to Barry J. Nidorf, in an effort to comply with a settlement agreement with the California Department of Justice. We agree that Barry J. Nidorf Juvenile Hall needs to be reformed and therefore, with the existing resources dedicated in improving the facility, Barry J. Nidorf Juvenile Hall has the potential to becoming the blueprint on effectively transforming facilities to better rehabilitate juveniles.

Furthermore, it is critical to emphasize that following an exhaustive review of licensed probation facilities, Barry J. Nidorf Juvenile Hall has been recommended by the County Probation Department to serve as the permanent SYTF in a comprehensive report and proposal that was submitted to the Board of Supervisors on February 8, 2022. This report explicitly outlines how the Probation Department would collaborate with other subject matter experts in integrating the LA Model and Youth Justice Reimagined to transform the facility to provide trauma-informed services and programs that are delivered to develop the skills needed for successful re-entry into the community. Additionally, the report provides a detailed plan that outlines the facilities existing capacity and amenities that make, a reformed, Barry J. Nidorf

Juvenile Hall the most feasible option to adequately rehabilitate juvenile serious offenders formerly under the custody of the DJJ.

Moreover, given Barry J. Nidorf Juvenile Hall's location near Interstate 5, State Route 14, Interstate 210 and the Metrolink commuter train service, the facility is centrally located and easily accessible for County staff, visiting families, community-based organizations, and partner agencies. Additionally, Barry J. Nidorf Juvenile Hall has the existing County and community partnerships and 24/7 nursing care with Olive View – UCLA Medical Center within close proximity to the facility that are already serving juvenile serious offenders and have the training and experience necessary to continue to work with this population.

As such, designating Barry J. Nidorf Juvenile Hall and reforming the programming offered at the facility to better serve juveniles, is the best opportunity in ensuring the greatest level of stability and continuity in services for the DJJ transition.

Finally, contrary to the language in the motion on Item 10, and in particular numbered paragraph 1 in the directives, review and analysis under the California Environmental Quality Act (CEQA) is required prior to adoption of this motion. The background states that the October 21, 2021, facility assessment concluded that Camps Scott, Paige, Afflerbaugh and Dorothy Kirby Center were feasible sites. The City of Santa Clarita (City) is on record with regard to its disagreement with this conclusion as it relates to Camp Scott. Furthermore, the City is also on record with regard to the JJRBG's conclusions that other sites in the County are not feasible. The Board of Supervisors, by this motion, adopts the recommendations of the JJRBG without undertaking any environmental evaluation of the actual feasibility of any of the sites. Thus, the Board of Supervisors is fully committing to and thus approving the selection of certain sites now by limiting the choice of alternatives once the CEQA review is returned by County staff. Furthermore, the motion directs staff to undertake CEQA with respect to the four sites and return with CEQA to *support* the designation—essentially directing the preparation of post hoc environmental justification for the project decisions being made in this motion.

As set forth in a leading CEB CEQA treatise, *Practice Under the California Environmental Quality Act* (emphasis added):

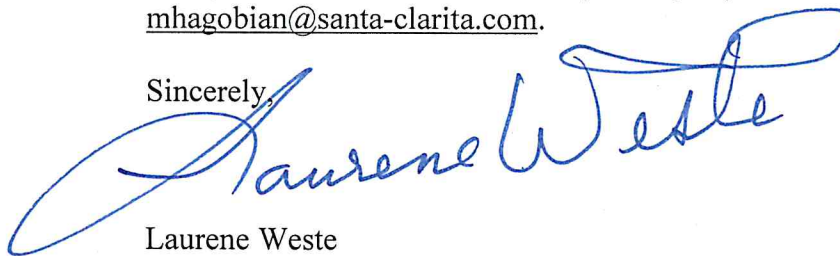
“CEQA applies when a public agency proposes to "approve" a project. (Pub Res C §21080(a); CEQA Guidelines § 15004; *Save Tara v City of W. Hollywood* (2008) 45 Cal.4th 116; *Saltonstall v City of Sacramento* (2015) 234 Cal.App.4th 549, 566; *RiverWatch v Olivenhain Mun. Water Dist.* (2009) 170 Cal.App.4th 1186.) The term "approval" refers to a public agency decision that "**commits the agency to a definite course of action in regard to a project.**" (CEQA Guidelines § 15352(a).”

“With respect to projects carried out by public agencies, **the CEQA Guidelines provide that agencies may not undertake actions that** could have a significant adverse effect on the environment, or **limit the choice of alternatives** or mitigation measures, **before complying with CEQA.** (CEQA Guidelines § 15004(b)(2).) **The term "approval" in the CEQA Guidelines is defined broadly so that an agency's commitment to a "definite course of action" on a project is treated as an approval.** (CEQA Guidelines § 15352(a). Under this standard, an agency cannot formally approve a project, or commit itself to approve it, without complying with CEQA before doing so.”

The Board of Supervisors should defer any action on this motion until the CEQA analysis can be completed, that includes the environmental analysis of alternative sites.

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 those formerly under the custody of the DJJ. 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.

Sincerely,



Laurene Weste
Mayor

Los Angeles County Board of Supervisors

March 14, 2022

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cc: Members of the City Council

Department of Youth and Community Restoration, California Health and
Human Services Agency

Los Angeles County JJRBG Subcommittee

Fesia Davenport, Los Angeles County Chief Executive Officer

Justice Deputies, Los Angeles County Board of Supervisors

Los Angeles County Probation Department

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