



March 29, 2011

Kamala Harris
Office of the Attorney General
1300 I Street, Suite 125
PO Box 944255
Sacramento CA 94244-2550

RE: Our profound thanks for your comment letter; Los Angeles County/Santa Clarita Valley General Plan; additional comments

Honorable Ms. Harris:

On behalf of the Democratic Alliance for Action, an officially chartered Democratic Party organization in the Santa Clarita Valley, please accept our profound gratitude for the exceptionally accurate comments your associate Susan Durbin and her colleagues submitted regarding the new General Plan for the Santa Clarita Valley areas under the jurisdiction of Los Angeles County. As you will see from our letter, this same level of analysis is also called for regarding the General Plan currently in review for the City of Santa Clarita jurisdiction of Santa Clarita Valley.

We hereby request that your office review the City of Santa Clarita "One Valley One Vision" Draft General Plan and Draft Environmental Impact Report and require corrections and recirculation of the DEIR to ensure that these documents provide complete and accurate information to the public and to our city leaders. Given the fact that both the Los Angeles County OVOV Area Plan and RDEIR, and the City's OVOV Plan and DEIR are essentially identical, and in light of the fact that the DOJ has asked the County to cure deficiencies in its RDEIR, we believe it is entirely appropriate at this time for your office to evaluate the City of Santa Clarita's OVOV Plan and DEIR.

We believe that, upon inspection, you will agree that the inconsistencies, omissions, and other apparent violations of state law contained in these documents must be corrected before the City's OVOV General Plan and DEIR can move forward. In the near future, the planning commission is expected to approve both the GP and FEIR and send them to the City Council.

One of the most glaring and significant errors that runs throughout the documents is the inappropriate and misleading comparison between the current General Plan and the OVOV build-out plan, whereas comparison of existing conditions to OVOV build-out is legally required by CEQA. The result is misrepresentation of the significant impacts of many aspects of the OVOV Plan.

Under Regulatory Framework, there is no discussion of legal requirements that oblige the City to meet the Southern California Association of Governments (SCAG) Regional Housing Needs Assessment numbers even though acceptance of that housing assignment will likely cause irreparable damage to the community by creating problems such as traffic gridlock; increased air pollution; unacceptable greenhouse gas emissions; insufficient commercial development and affordable housing to meet the necessary jobs-housing balance; deficiencies in public facilities including schools and parkland; environmental damage to the Santa Clara River — the last wild river in Southern California — and its tributaries under which lie the aquifer and alluvium that provide our local groundwater; potential water shortages; solid waste management problems, and the unsustainable burden of financing the massive infrastructure needed to support all of this growth.

Over the past ten years, the City of Santa Clarita has been working with members of the Los Angeles County Regional Planning staff to create a joint general plan with the stated intention of developing a cohesive buildout plan for the entire Santa Clarita Valley. And yet, no formal joint hearings or coordinated meetings have ever been offered to the public to allow for full dissemination and discussion of both the City's OVOV General Plan and the County's OVOV Area Plan.

Unlike the process used to create the City's original General Plan, wherein an appointed General Plan Advisory Committee met weekly to create the Plan over a two-year period, for this revised OVOV General Plan, the City hired one consultant. For preparation of the DEIR, the City brought in a consulting firm used almost exclusively by the City to provide environmental impact reports that are typically bloated, redundant, inconsistent and otherwise user-unfriendly. At nearly 12,000 pages combined, the OVOV Plan and DEIR are loaded with unsubstantiated claims, unsupported assumptions, faulty and inconsistent logic, and vague and unenforceable mitigation measures. They fail to inform the public and government officials as required under CEQA.

City staff has stated that this General Plan is a broad blueprint designed to address the worst-case scenario facing the City if population increases — as predicted by SCAG — are realized. Members of the planning commission were informed that they or their successors would have the opportunity to tweak the General Plan to make course corrections as the City moves toward buildout, but the General Plan does not provide a development monitoring system or establish defined thresholds at which re-evaluation would be triggered in order to provide timely opportunities for corrections in order to meet local, regional and state objectives.

In conclusion, we urge you to scrutinize the City of Santa Clarita OVOV General Plan and DEIR, and require: (1) corrections where errors, distortions and omissions are evident with particular emphasis on traffic circulation, multimodal transportation, jobs/housing creation and balance, air quality, water resources and quality, and public infrastructure (schools, libraries, other facilities) in order to provide a complete and accurate picture of potential environmental impacts; (2) feasible and enforceable mitigations that may reduce impacts to a level of less than significant; (3) a financial feasibility study to demonstrate the costs of mitigation measures and infrastructure requirements needed to meet the demands of projected growth; and, (4) a complete and accurate analysis of alternatives.

Many in our community are fully supportive of "smart growth" approaches that meet state requirements and that will allow sustainable build-out of the Santa Clarita Valley. Neither the County's Plan, nor the City's is designed to fulfill that goal.

Thank you for your continuing commitment to good planning and environmental quality. We appreciate your consideration of our request.

Sincerely,

Michael Kulka

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cc: Susan Durbin, Deputy Attorney General