



**Thomas M. Surak**

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Mr. Jason Smisko, Senior Planner

City of Santa Clarita

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Mr. Paul Novak, Planning Deputy

County of Los Angeles

Email: [sosuna@lacbos.org](mailto:sosuna@lacbos.org)

Re: Notice of Preparation - One Valley, One Vision

Dear Mr. Smisko and Mr. Novak:

I am pleased to be able to provide the following comments regarding the draft OVOV documents. In general, the documents appear to be deficient in many areas. They do not offer Santa Clarita residents the same protections and promises which currently exist in the General Plan. Also, as having participated in many aspects of the OVOV process, I can testify to the fact that it was overly cumbersome, often confusing and not at all conducive to inviting full participation by all interested parties. Several of my specific issues and concerns are discussed below. I expect similar comments will be submitted by other residents, which will require additional public participation before the OVOV process can move forward. I can only hope that this will lead to timely and successful resolution of all issues.

The City has not made a proper showing for why it is proposing significant revisions the existing General Plan. The City's flyer, "OVOV Facts and Benefits" which was widely circulated to the public, clearly states that the build-out population estimates adopted for the 1991 General Plan maxed at 521,977 people, and that the OVOV estimates a build-out population range of 444,000 to 485,000. The obvious yet unanswered question is then, "Why are increases in zoning densities, in many cases significant ones, being proposed for the OVOV?" The City cannot legitimately argue that the increased density is to accommodate non-residential development because most OVOV commercial zoning definitions allow for extremely high density (e.g., a minimum of 11 units per acre) residential use. These "commercial zone" residential densities overwhelm those of the surrounding neighborhoods, and such development can only be perceived as detrimental to nearby residents. As further discussed below, the City's concept of a "Valley of Villages" as laid out in the OVOV is not consistent with the principle of enhancing established neighborhoods, nor with development consistent with neighborhood community character, which are both key objectives stated in the OVOV.

Page L-39 of the current General Plan makes it clear that the land use designations adopted in 1991 "should not be construed as temporary holding categories awaiting higher density designations in the

future.” It further states, “The Plan has looked at development suitability within the entire Santa Clarita Valley and applies designations for anticipated, long-term future development.” The draft OVOV clearly makes a mockery of this promise. OVOV zoning densities are drastically increased throughout the valley.

Also, many new zoning categories are overly broad with respect to allowable types of applicable development. For example, the Regional Commercial, Community Commercial and Neighborhood Commercial zoning designations all allow for mixed use (i.e., residential) development, even though the OVOV also has separate “Mixed Use” zoning designations which more clearly convey the ability to allow such proposed developments. The General Plan is clear when it states “surrounding characteristics, preservation of neighborhood integrity and compatibility with existing uses shall also be taken into consideration in connection with new development proposals.” The guiding theme of the OVOV, “A Valley of Villages”, casts these neighborhood protections aside by requiring increasing density projects which are entirely inconsistent with the characteristics of surrounding neighborhoods.

The City’s concept of a “Valley of Villages” conveniently avoids discussion on the subject of different housing types having different public service requirements. For example, persistent crime hotspots in the Santa Clarita Valley are highly correlated with housing density, e.g., the largest crime problems are associated with higher density housing near downtown Newhall and in Canyon Country. The OVOV does not consider or address additional financial and emotional costs which will be imposed upon existing residents as a consequence of increased crime associated with the OVOV’s high density housing proposals.

The OVOV undermines existing neighborhood protections from such high density projects. These protections are inherent in the 1991 General Plan, which many who have since settled into Santa Clarita relied on when making their decision to move here. Without a showing of benefits to existing neighborhoods, one can readily conclude that the OVOV is primarily designed to provide developers an opportunity to further increase their profit opportunities through increased zoning densities. Such opportunities are properly restricted under the existing General Plan through its embedded protections provided to residents of Santa Clarita, and these protections must be maintained.

Some basic elements of the OVOV which must be understood to ensure full participation in the OVOV process were not (and may still not be) clearly communicated to the public. For example, the proposed zoning designation of the Smiser property located in my neighborhood near Calgrove & Wiley Canyon was recently (and unknowingly) revised. At the November public workshops which showcased the draft OVOV, the Smiser property zoning designation was clearly identified as Community Commercial. A completely new zoning designation for this property, Mixed Use – Neighborhood (MXN), has just recently been brought to my attention. However, one cannot readily determine that there has been a new zoning designation by reviewing the revised December 19 Preliminary Land Use map posted for public review, which is the key document for purposes of OVOV review and understanding. The blue and white striped color designation assigned to this MXN zoning designation on the map completely blends in with the blue and white stripe used to assumedly delineate the city boundary which is adjacent to the Smiser property. No reasonable person could have been expected to learn of this zoning change through periodic review of this map, yet that is what was expected from those attempting to participate in the OVOV process. I can only assume that this color scheme selection was just a coincidence and unintentional. However, it does illustrate one of the many unnecessary difficulties OVOV participants have had to overcome in order to properly become engaged in the OVOV process.

Another example of confusion derives directly from the exclusion of a critical clarification in the General Plan from the OVOV zoning definitions. The General Plan clarifies that appropriate project intensity “is generally expected to be between the low and mid-point of the allowable floor area ratio (FAR) range”. Comparisons made by City Staff in documents and at public meetings which suggested that allowable city development under the General Plan and the OVOV were equivalent did not incorporate the lower FAR range clarification embedded in the General Plan, and thus overstated allowable development

under the General Plan. Stated another way, the OVOV will allow for much denser development even at similar FAR since it no longer requires project intensity to be at the lower end of the allowable FAR range. Unless the above clarification regarding a lower appropriate project intensity is incorporated into the OVOV, representations made regarding comparable allowable development under the General Plan and the OVOV were incorrect because they minimized impacts under the OVOV, and were likely to have diminished public participation in the OVOV process.

Also, there is language throughout the OVOV which lessens the certainty of limiting future development to the designated zoning. For example, page I-3 states “all subsequent planning and development decisions within the Santa Clarita Valley planning area shall be determined to be consistent with these documents, except as provided herein for any land use applications pending during the plan preparation and adoption process.” This caveat completely undermines the ability of citizens to fully appreciate what is capable of being developed in their neighborhoods and other areas where they may have special concerns and interests, and effectively disengages many from actively participating in the OVOV process. In addition, this caveat is not consistent with public representations which have made. Please refer to an October 5, 2008 article in “The Signal” titled, “SCV ponders ‘one vision’ for growth” which quotes both of you as well as Paul Brotzman. This article includes the following statement: “Though general plans by definition are general, the state mandated documents must include a map that describes exactly what type of development can occur on every inch of land.” I do not recall any clarification or rebuttal to this statement having been made by City or County staff. I also believe many more residents have read “the Signal” for information on the OVOV than have read through the several hundred pages of draft OVOV documents. The development flexibility being sought in the OVOV which I cited above does not comply with this statement. Therefore information provided to the majority of residents regarding the development flexibility sought within the OVOV is misleading at best. The City and County cannot assume that residents fully comprehend this development flexibility. Therefore the OVOV cannot be allowed move forward with this intended flexibility without further public disclosure and discussion.

The OVOV inadequately addresses how existing deficiencies in City parks and recreation facilities will be met. The OVOV states, “The Land Use Element is the City's and County's long-term blueprint for development of property to meet Santa Clarita Valley's future needs for ... parks, open space...including location for future uses within the planning area.” It furthermore states, “The provision of adequate park space and facilities to serve residents is not only required by State planning law, but is recognized as necessary to provide for public health and quality of life.” The OVOV further recognizes that “another issue for park development is distribution of park facilities, as many local parks are concentrated within master planned communities, and outlying areas have access to fewer local parks.” The OVOV confirms that the City has a “standard” (the term “requirement” is used in the 1991 General Plan, which I interpret as the true intent) of five acres of park facilities per 1000 residents, and yet the City currently has “only about 1.5-2 acres of developed parkland per 1000 population”, which is essentially unchanged from when the General Plan was adopted in 1991. (In fact, as of October 2008 the true ratio is 1.4 acres of parkland per 1000 population as stated by the City of Santa Clarita Parks, Recreation, and Community Services Commission, which increases the magnitude of the existing parkland deficiency.) In essence, notwithstanding the claims that significant parkland has been added since 1991, due to corresponding population growth there has been no significant progress made towards meeting the parkland “target” in almost two decades. This is especially true in areas which were identified as being underserved throughout that timeframe, which will have to be met through land acquisition using “additional funding sources.” This is because the State's Quimby Act which has been used to acquire the majority of parkland added since 1991 only provides parkland (and only at an below “target” three acres per 1000 population) for residents of new developments.

The OVOV ignores the critical additional parkland requirement (per Policy LU 3.4.1) by stating that the Conservation and Open Space element “will not serve as a park master plan but will instead focus on broad policy issues relating to park planning.” The OVOV just defers on this issue by identifying as City Task 8.1, “Complete and adopt a revised Park and Recreation Master Plan for the City by 2009.” This is unacceptable. The OVOV must fully coordinate with the park master plan on a detailed level; by not

doing so, the OVOV invites development of remaining open areas which must be preserved for future parkland to meet the adopted parkland "target." This need for coordination holds especially true in areas which have an identified parkland deficiency and minimal remaining acreage which can help meet that deficiency. In fact, the Final Draft of the Parks, Recreation and Open Space Master Plan Update states, "Priority should be given to meeting the current (park) acreage deficit of 612 acres." However, the OVOV not only lacks any priority with respect to additional parkland in the OVOV, there are inherent barriers to the creation of additional parkland created by the OVOV.

For example, the Calgrove/Wiley Canyon neighborhood was identified in the existing General Plan as being "severely underserved" with respect to parks (this neighborhood is similarly identified as having a "service area gap" in the Final Draft of the Parks, Recreation and Open Space Master Plan Update, which I take as a euphemism). The only remaining undeveloped land which can be used for a neighborhood park in the Calgrove/Wiley Canyon area is the Smiser property. However, not only does the latest OVOV zoning of the Smiser property not include any reference to parkland, it instead proposes to increase the density allowed for development of that property! By increasing the allowable build densities on remaining undeveloped property such as Smiser, the OVOV increases the residual value of properties which are most suitable for helping close the significant gap between target and actual park acreage. Thus the OVOV will create further barriers to meeting the park master plan objectives by unnecessarily increasing the future cost of acquiring acreage for parkland. This will undermine the ability of and likely preclude the City from meet existing, let alone future, parkland needs under the prescribed "target".

The environmental aspect of the OVOV addresses climate issues only from a macro perspective; the issue of microclimate changes which are common with increased "urbanized" development such as that contemplated by the OVOV is ignored. Microclimate issues must be incorporated into the EIR study process to provide a complete and proper assessment of potential impacts from the build out proposed by the OVOV. Also, there is a lack of focus on increased noise associated with increased urban development, both during and after construction, as proposed in the OVOV. The importance of this issue cannot be ignored since increased noise pollution has the ability to undermine the tranquility that residents of Santa Clarita currently appreciate and will continue to expect in the future.

Please feel free to contact me for further clarification on the above.

Sincerely,

Thomas M. Surak