



C A L I F O R N I A

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May 9, 2025

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RE: Stanislaus County's General Plan Requirements

Dear Ms. Freitas:

The California Attorney General's Bureau of Environmental Justice respectfully submits this letter to Stanislaus County regarding the County's duties to review and update provisions of its General Plan to address disadvantaged communities, environmental justice, and climate adaptation and resiliency as required under the State Planning and Zoning Law (Government Code section 65300, *et seq.*).¹ We have reviewed the County's 2015 General Plan and its amended third draft 2023-2031 Housing Element Update (draft Housing Element)² and are concerned that the County has not complied with applicable requirements under sections 65302, 65302.1, and 65302.10.³ First, the County⁴ has not updated the Land Use Element's identification of disadvantaged unincorporated communities and their infrastructure and service needs as the County was required to do by December 2023. Information included in the draft Housing Element relating to disadvantaged unincorporated communities does not satisfy Government Code section 65302.10, a law established by and commonly referred to as "SB 244." Second, while the draft Housing Element includes some information and policies relating to environmental justice, the stated goals, objectives, and policies do not satisfy requirements under "SB 1000," legislation codified in Government Code section 65302, subdivision (h).

¹ The Attorney General submits these comments pursuant to his independent power and duty. (*See* Cal. Const., art. V, § 13; *D'Amico v. Bd. Of Medical Examiners* (1974) 11 Cal.3d 1, 14-15). All statutory citations are to the Government Code unless stated otherwise.

² All references to "elements" are to the existing topical elements of the County's 2015 General Plan. References to the County's draft Housing Element are to the amended third draft Housing Element chapters posted on the County's website for its 6th cycle Housing Element Update as of April 9, 2025.

³ This letter does not address the sufficiency of the draft Housing Element under the State Housing Element Law (§§ 65580-65589.11). The County should refer to the Department of Housing and Community Development's (HCD) letter dated April 4, 2025 for HCD's review of the draft Housing Element's deficiencies under the Housing Element Law.

⁴ As used in this letter, "County" refers both to the physical territory encompassed by the County of Stanislaus as well as to the legal subdivision of the State of California.

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Third, the County's Safety Element fails to address climate adaptation and resiliency as required by Government Code section 65302, subdivision (g), and the County has missed several deadlines to update the Safety Element with respect to its climate adaptation and resiliency and flood hazard information and policies. The County would miss yet another deadline if it delays its Safety Element update until after it adopts its updated Housing Element. Fourth, the General Plan lacks analysis and policies to improve air quality as required by Government Code section 65302.1. Each of these four issues is discussed in detail below.

Stanislaus County is home to some of California's most pollution-burdened communities, communities that also face chronic lack of access to infrastructure and services and community-serving resources and amenities. At the same time, the increasing impacts of climate change touch all areas of the County and place disadvantaged communities and vulnerable populations at particular risk. The County's compliance with its planning mandates is crucial to addressing these inequities and to ensuring that all County residents can enjoy access to a healthy environment and the resources and opportunities necessary to thrive.

I. Environmental Burdens and Resource Deficiencies in Disadvantaged Communities in Stanislaus County

In the draft Housing Element, the County finds that most of the western half and parts of the central and eastern portion of the County qualify as disadvantaged communities. (Draft Housing Element, p. 3-73.) These disadvantaged communities include some of the most environmentally-burdened communities in the State, according to the California Environmental Protection Agency's (CalEPA) CalEnviroScreen 4.0 tool. Disadvantaged communities in Stanislaus County face exposure to pesticides, contaminated drinking water, hazardous waste sites and other environmental hazards associated with the region's agricultural and industrial operations, as well as diesel particulate matter from traffic on State Route 99. (Stanislaus County Environmental Justice Technical Report: SB 1000 Compliance [Environmental Justice Technical Report], p. 51.) Residents of disadvantaged communities also frequently lack access to adequate water, wastewater, and other basic infrastructure and services to meet day-to-day needs and protect public health. (See Land Use Element, Appendix I-D, Stanislaus Disadvantaged Unincorporated Communities Report [DUC Report]). Disadvantaged communities in Stanislaus County bear the hallmarks of chronic disinvestment in other community-serving resources and amenities, reflected in insufficient access to fresh food, adequately maintained park spaces and facilities, and decent quality affordable housing. (Draft Housing Element, pp. 3-75, 93, 116-117; Environmental Justice Technical Report.) Community stakeholders have highlighted these and other environmental justice issues that persist in Stanislaus County and have pointed to the need for more meaningful and inclusive community engagement to resolve them through local government decision-making.⁵

As in counties across California, climate change is magnifying environmental hazards and the public health and safety risks associated with infrastructure and service deficiencies in Stanislaus County. Since the County adopted the 2015 General Plan, the County faces new and

⁵ See e.g., J. Bisharyan, *New Report Calls for Economic Justice in the County's Underserved Communities*, The Modesto Bee (Apr. 9, 2025), <https://www.modbee.com/news/local/article303859216.html>.

accelerating risks associated with extreme heat, prolonged droughts, severe flooding, and wildfires.⁶ Disadvantaged communities and vulnerable populations, including for example, linguistically-isolated populations, immigrants, and people with disabilities, are more likely to experience harm from climate change compared to the general population, a fact which compounds existing disparities in pollution exposures and resources inadequacies.⁷

II. The County Must Update its Analysis of Disadvantaged Unincorporated Communities in its Land Use Element Pursuant to SB 244

In enacting SB 244, the Legislature recognized that disadvantaged unincorporated communities (DUCs) in California suffer from a “distinct lack of public and private investment that threatens [residents’] health and safety.” (Stats. 2011, Ch. 513, sec. 1, subds. (a)(1), (a)(2).) SB 244 therefore aims to encourage investment in DUCs and address the complex barriers that contribute to infrastructure deficits and inequality. (*Id.*, sec. 1, subd. (b).) To accomplish this goal, SB 244 mandates that land use elements satisfy three requirements. First, land use elements must identify certain DUCs located within the local government’s boundaries. (§ 65302.10, subd. (b)(1).) Second, for each community identified, the land use element must analyze the community’s water, wastewater, stormwater drainage, and structural fire protection needs or deficiencies. (*Id.*, subd. (b)(2).) Third, the land use element must analyze benefits assessment districts and other financing alternatives that could make the extension of services to identified communities financially feasible. (*Id.*, subd. (b)(3).) Cities and counties must review and update the SB 244 analysis as necessary on or before the due date for each revision of the jurisdiction’s housing element. (*Id.*, subd.(c).)

The County adopted its SB 244 analysis, the Stanislaus County Disadvantaged Unincorporated Communities Report (DUC Report), as an appendix to its Land Use Element in 2015.⁸ The County was required to review and update the analysis by December 31, 2023. (§ 65588, subd. (e)(3)(A); HCD, Housing Element and Regional Housing Needs Determination Schedule.)⁹ To date, the County has not updated its SB 244 analysis. The County’s draft Housing Element includes some information relevant to infrastructure and service needs in DUCs. However, this analysis does not satisfy SB 244’s update requirement for two reasons. First, the draft Housing Element’s discussion relating to SB 244 primarily summarizes information contained in the DUC Report, and it fails to identify DUCs, infrastructure and service needs in DUCs, or financing alternatives available to address those needs based on current information.

⁶ See e.g., K. Carlson, *Valley Fever Cases Soar in Stanislaus County. What’s the Reason for the Big Increase?* The Modesto Bee (Aug. 14, 2023), <https://www.modbee.com/living/health-fitness/article278080837.html>; K. Carlson, *Severe Heat Waves, Longer Drought Among Climate Impacts Expected in Stanislaus County*, The Modesto Bee (Aug. 13, 2023), <https://www.modbee.com/news/weather-news/article278040103.html>.

⁷ For a detailed discussion of populations vulnerable to the impacts of climate change, see the Governor’s Office of Land Use and Climate Innovation’s Executive Order B-30-15 Resiliency Guidebook, Vulnerable Populations (2018). The guidebook is available at https://lci.ca.gov/docs/20180312-Vulnerable_Communities_Descriptions.pdf.

⁸ Though the County adopted its SB 244 analysis before it adopted its 2015 General Plan on August 23, 2016, the County adopted the SB 244 analysis as an appendix to the 2015 General Plan. (See 2015 General Plan, Table of Contents.)

⁹ HCD’s Housing Element and Regional Housing Needs Determination Schedule is available at <https://www.hcd.ca.gov/planning-and-community-development/housing-element-and-regional-housing-needs-determination-schedule>.

(Draft Housing Element, pp. 3-11, 73-76.) Second, while the County may include information relevant to SB 244 in the Housing Element, the County is required to update the SB 244 analysis set forth in its Land Use Element. (§ 65302.10, subds. (b), (e).)¹⁰

A. Identification of Disadvantaged Unincorporated Communities

SB 244 requires that county general plan land use elements identify disadvantaged unincorporated communities located within the county's boundaries, but not within the sphere of influence of a city, that qualify as "legacy" communities. (§ 65302.10, subd. (b)(1).) For purposes of SB 244, a "community" means an area with at least ten dwellings located in close proximity to one another, and a "legacy community" means a geographically isolated community that has existed for at least 50 years. (§ 65302.10, subd. (a)(1), (a)(5).) Legacy communities in which median household income that is 80 percent or less than the statewide median household income qualify as "disadvantaged unincorporated communities" subject to SB 244. (§ 65302.10, subd. (a)(2).) The land use element identification of disadvantaged unincorporated communities must include a description of each qualifying DUC and a map designating its location. (*Ibid.*)

The County must update its DUC Report as necessary to ensure that it identifies all legacy DUCs within Stanislaus County. Data included in the draft Housing Element indicates that the unincorporated community of La Grange qualifies as a DUC subject to SB 244, although neither the Land Use Element, including the DUC Report, nor the draft Housing Element identifies it as such. According to the draft Housing Element, the median household income in La Grange, based on 2020 five-year American Community Survey data, is \$16,875, well below the \$62,938 cutoff to qualify as disadvantaged based on the median statewide household income of \$78,672. (Draft Housing Element, pp. 3-37, 39.) As a "historic mining community," La Grange has existed for the requisite 50 years to qualify as a DUC. (§ 65302.10, subd. (a)(5); Draft Housing Element, p. 3-159.) In addition to La Grange, several other unincorporated communities in Stanislaus County appear to meet at least some of the criteria to qualify as a DUC based on their age, location outside of the sphere of influence of any city, and historic household income data. These communities include one community located along Bragg Road, south of Ceres, and another community located along Santa Fe Avenue, north of Denair.¹¹

We recommend that the County evaluate whether these and any other communities qualify as DUCs pursuant to SB 244 in developing amendments to its DUC Report. U.S. Census data for census designated places (CDPs) may not accurately reflect median household income and the disadvantaged status of certain unincorporated communities in Stanislaus County due to their small size. The Governor's Office of Land Use and Climate Innovation (LCI) and

¹⁰ While including updated information and analysis in the Housing Element is permitted, not updating the SB 244 analysis in the Land Use Element would likely violate the requirement that general plans comprise an internally consistent, integrated document. (See § 65300.5, subd. (a); *Concerned Citizens of Calaveras County v. Board of Supervisors* (1985) 166 Cal.App.3d 90, 97, 103; see also § 65030.1 [stating that an effective planning process should guide decisions relating to growth].)

¹¹ Policy Link's 2013 report California Unincorporated: Mapping Disadvantaged Unincorporated Communities in the San Joaquin Valley (California Unincorporated) identifies several of these communities as meeting the criteria to qualify as DUCs under SB 244 based on 2000 census block group data. (PolicyLink, California Unincorporated, 2013, p. 40.) The report is available at https://www.policylink.org/sites/default/files/CA%20UNINCORPORATED_FINAL.pdf.

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PolicyLink have released technical guidance discussing data sources that local governments may consider to accurately identify DUCs within their jurisdiction. (*See* LCI, Technical Advisory, Senate Bill 244: Land Use, General Plans, and Disadvantaged Communities [SB 244 Technical Advisory], pp. 6-7;¹² PolicyLink, California Unincorporated: Mapping Disadvantaged Communities in the San Joaquin Valley (2013).)

B. Water Needs and Deficiencies

SB 244 requires that land use elements analyze water needs and deficiencies for each DUC identified. (§ 65302.10, subd. (b)(2).) Water needs and deficiencies that SB 244 analyses should address include the availability of safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. (*See* § 65030.1 [declaring the Legislature’s intent that local decisions relating to growth proceed within the framework of statewide environmental and resource-use policies]; Water Code § 106.3, subd. (a) [defining the human right to water in California].) To effectuate SB 244’s intent to overcome public and private disinvestment in DUCs, the analysis should address water needs that, if satisfied, would enable infill development and promote equity. (*See* § 65041.1, subd. (a) [establishing as a state planning priority the promotion of infill development and equity in underserved areas]; Stats. 2011, Ch. 513, Sec. 1.)

The County must use available data, including but not limited to municipal service reviews prepared by the Stanislaus Local Agency Formation Commission (LAFCo), to prepare its SB 244 water analysis. (§ 65302.10, subds. (b), (c).) Since the County adopted the DUC Report in 2015, Stanislaus LAFCo has updated the municipal service reviews for utilities serving several DUCs, including the Grayson, Crows Landing, Keyes, and Monterrey Park Tract Community Service Districts (CSDs).¹³ Other valuable sources of information to support a complete SB 244 analysis include annual consumer confidence reports prepared by CSDs; the State Water Resource Control Board’s (SWB) Sustainable Groundwater Management Act (SGMA) DataViewer tool, which provides block group level water quality and supply data; the SWB’s SAFER Dashboard, which contains mapped data about water quality, accessibility and affordability and technical, managerial, and financial capacity among water systems; Central Valley-Salinity Alternatives for Long-Term Sustainability (“CV-SALTS”) domestic well testing data; and Groundwater Sustainability Plans.¹⁴

The DUC Report identifies water contamination and water supply deficiencies impacting several DUCs, but this information is incomplete and must be updated. An update to the DUC Report must address whether contamination issues identified in the report persist and whether additional contamination issues have arisen in the DUCs identified since the report’s adoption.

¹² The SB 244 Technical Advisory is available at https://lci.ca.gov/docs/SB244_Technical_Advisory.pdf.

¹³ Stanislaus County LAFCo’s municipal service reviews are available online at https://www.stanislauslafco.org/service_reviews.shtm.

¹⁴ Links to the interactive SGMA DataViewer tool and other SGMA technical assistance data and tools are available online at https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Data-and-Tools/Files/FAQ-and-Fact-Sheets/SGMA-Data-Tools-and-Reports-Fact-Sheet_2023.pdf. The SWB’s interactive SAFER Dashboard is available online at https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/saferdashboard.html.

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For example, the DUC Report mentions that water infrastructure in Westley requires improvement, but it does not address water quality or water supply deficiencies in the community. The draft Housing Element, in turn, states that, the “Westley CSD currently meets the needs of its customers,” but that repairs to the water system will be needed in the future. (Draft Housing Element, p. 3-74.) However, news reports from 2024 and 2025 indicate that Grayson Elementary School, which is located in Westley, has never had potable water in its 70-year history and recurring water shutoffs occur at the school due to maintenance deficiencies and power outages, forcing the school to rely on portable toilets for student use.¹⁵ As another example, neither the DUC Report nor the Draft Housing Element provides information about current water quality or supply needs in Cowan Tract, with both stating only that Cowan Tract relies on private wells. However, according to the SWB’s SGMA DataViewer, Cowan Tract is located within a census block group that ranks higher than 96 percent of all block groups in the State for water quality hazards, and groundwater within the block group exceeds legally permissible limits for several chemicals, as depicted below. (Fig. 1.) Groundwater levels in the area surrounding Cowan Tract are also declining, which may limit water supply to meet household and infill needs.¹⁶

¹⁵ N. Burns, *California School Could Finally Provide Clean Drinking Water After 70 years*, CBS News (Jan. 23, 2025), <https://www.cbsnews.com/sacramento/news/california-school-drinking-water-after-70-years/>; J. Wilkinson, *Grayson Elementary Water Issues Discussed*, The Patterson Irrigator (Nov. 7, 2024), https://www.ttownmedia.com/patterson_irrigator/grayson-elementary-water-issues-discussed/article_64e65eec-9d44-11ef-a9f3-c79b2a17d581.html.

¹⁶ See J. Holland, *Turlock and Ceres Residents Finally Get Treated River Water, After 30-Plus Years of Talk*, The Modesto Bee (Nov. 15, 2023), <https://www.modbee.com/news/local/turlock/article281704788.html>.

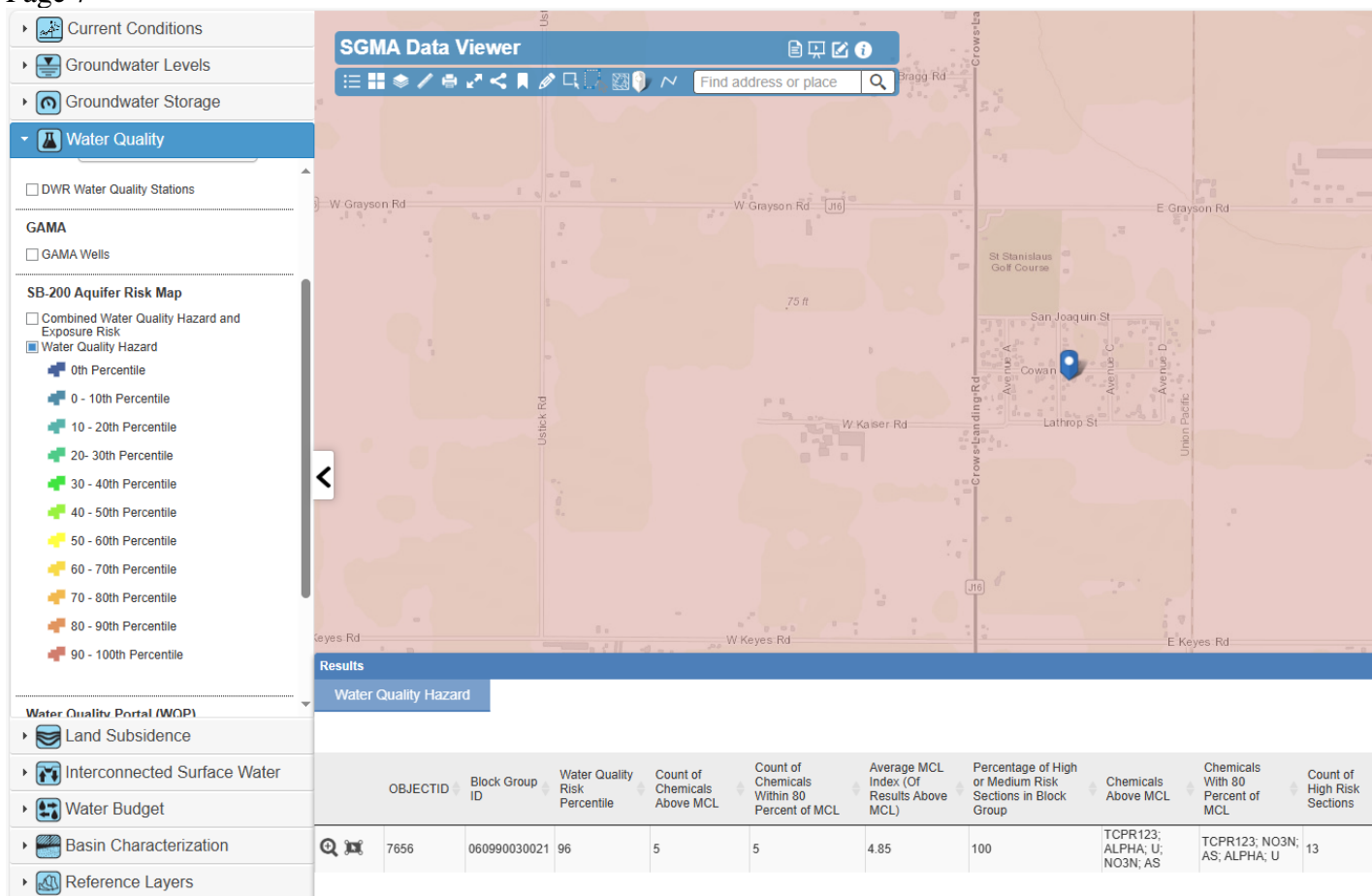


Figure 1: SGMA DataViewer Combined Water Quality Hazard and Exposure Risk, Cowan Tract

In addition, neither the DUC Report nor the draft Housing Element’s SB 244 discussion addresses water affordability needs in DUCs. The State Water Board maintains the Water System Financial Capacity & Community Affordability Dashboard, which provides mapped data about drinking water affordability by water system. Duke University also maintains a Water Affordability Dashboard, which includes water service financial burden metrics data by water provider.¹⁷ The County can consider these and other data sources to develop revisions to its DUC Report that address the water affordability needs in DUCs.

Finally, drought and other weather events related to climate change will increasingly impact water quality, supply, and affordability in Stanislaus County going forward, and the County should consider these impacts in its SB 244 water analysis update.¹⁸

¹⁷ The SWB Affordability Dashboard and Duke University’s Water Affordability Dashboard are respectively accessible at https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/afforddashdashboard.html and <https://nicholasinstitute.duke.edu/water-affordability/water-affordability-dashboard/>.

¹⁸K. Carlson, *Modesto and Turlock Irrigation Districts Content with the Violent Swings of Climate Change*, The Modesto Bee (Oct. 9, 2023), <https://www.modbee.com/news/business/agriculture/article280167599.html>.

C. Wastewater Needs and Deficiencies

Like the analysis of community water needs, the SB 244 analysis of community wastewater needs should analyze each community's needs for safe, clean, and affordable wastewater service. (*See* § 65030.1; Water Code §§ 106.3, subd. (a) [declaring the human right to water, including for sanitary purposes]; 189, subd. (b) [establishing a state office to ensure the effective provision of safe, clean, affordable, and reliable drinking water and wastewater treatment services].) Neither the DUC Report nor the draft Housing Element's SB 244 discussion adequately analyze the wastewater needs in DUCs. For example, for communities served by septic systems, including Cowan Tract, Crows Landing, Riverdale Park Tract, and Monterey Park Tract, the DUC Report and the draft Housing Element provide no information about the needs or deficiencies relating to those septic systems. Aging septic systems often leach effluent into groundwater, threatening drinking water quality for groundwater users.¹⁹ Private septic systems may also be unable to sufficiently meet household needs or may not permit infill development due to capacity constraints and density restrictions. (*See* State Water Board, Onsite Wastewater Treatment System Policy (2023), p. 26.)²⁰ The Crows Landing Community Plan recognizes these limitations, stating that the absence of a community sewer system prevents future growth within the community. (Land Use Element, Appendix I-A1, Crows Landing Community Plan, p. I-83.) The County must analyze the wastewater needs and deficiencies associated with reliance on septic systems in several DUCs.

The County must also update its analysis of wastewater needs and deficiencies for DUCs served by community wastewater systems. For example, the DUC Report stated that “major repairs” to the Westley community sewer system will be necessary soon, while the Westley Community Plan states that capacity limitations restrict population growth within the community. (Land Use Element, Appendix I-A9, Westley Community Plan.) On the other hand, the draft Housing Element simply states that Westley's wastewater system is operating at capacity but provides no information about whether, nine years after the DUC Report's adoption, the necessary repairs have been completed. (Draft Housing Element, p. 3-75.)

D. Stormwater Drainage Needs and Deficiencies

The County must update the DUC Report to identify the specific stormwater drainage needs in DUCs. (§ 65302.10, subd. (b)(2).) Both the DUC Report and the draft Housing Element state that most DUCs in the County lack a complete stormwater drainage system — or any stormwater drainage system — and for certain communities, the DUC Report explains drainage consists of roadside percolation or rock wells. However, the DUC Report and draft Housing Element stop short of analyzing communities' stormwater drainage needs and deficiencies, such as whether and where existing infrastructure conditions have resulted in flooding. The updated SB 244 analysis should provide information about the severity and frequency of any flooding

¹⁹ *See* U.S. Environmental Protection Agency (EPA), Septic System Impacts on Water Sources (Jul. 16, 2024), <https://www.epa.gov/septic/septic-system-impacts-water-sources>.

²⁰ The SWB's 2023 Onsite Wastewater Treatment System Policy is available online at https://www.waterboards.ca.gov/water_issues/programs/owts/docs/adopted_owts_policy.pdf.

that has resulted from inadequate stormwater drainage infrastructure in order to allow the County to prioritize improvements in areas of greatest need.

E. Structural Fire Protection Needs and Deficiencies

The County's update to its DUC Report must address communities' structural fire protection needs and deficiencies. (*Id.*) Deficiencies might include inadequate water supply and pressure, firefighting infrastructure, and fire service personnel stationed in close proximity to communities. They might also include a lack of building characteristics that limit the risk of structural failure under fire exposure. However, the DUC Report lacks any specific information identifying community structural fire protection needs and deficiencies. Rather, the DUC Report provides the number of firefighters employed by, and the Insurance Services Office (ISO) ratings for, fire departments that serve DUCs, but it does not address the adequacy of the firefighting force or explain the bases for fire departments' individual ISO ratings which could shed light on communities' fire protection needs and deficiencies. (*See e.g.*, DUC Report, p. I-310.) The draft Housing Element's SB 244 discussion offers even less information about communities' structural fire protection needs: it does not address fire protection needs at all for several DUCs, such as Crows Landing, Grayson, Riverdale Park Tract, and Westley. (Draft Housing Element, pp. 3-74, 75.) For other DUCs, the draft states only that fire protection "is considered low," without explaining the needs or deficiencies that have resulted in inadequate protection. This lack of specificity is insufficient. The County must update the DUC Report to incorporate current data regarding the specific structural fire protection needs and deficiencies in DUCs. Doing so will better enable the County and local fire departments to develop and implement strategies to reduce high-priority fire risks and improve safety in DUCs. In developing this update, the County should consider how extreme weather events associated with climate change, including drought and extreme heat, may contribute to those needs and deficiencies.

F. Financing Alternatives to Address Infrastructure and Service Needs

The County must update the DUC Report to analyze financing alternatives that could make the extension of services available to DUCs located in the County, based on an updated identification of DUCs and their infrastructure and service needs as discussed above. (§ 65302, subd. (c).) For each DUC and the infrastructure and service needs in those DUCs, the DUC Report simply concludes that "benefit assessment districts or other property-based revenue sources would be problematic given [the community's] low median income." (DUC Report, pp. I-355-356.)²¹ The DUC Report includes almost no other information or analysis relating to financing alternatives available to address community infrastructure needs. (*Ibid.*) This is insufficient.

LCI's SB 244 Technical Advisory provides information about funding sources available to local governments to address infrastructure and service needs in DUCs. These include but are not limited to taxes, benefit assessments, bonds, exactions, and a range of grants and low-interest

²¹ The DUC Report identifies an existing policy and several implementation measures that generally support improvements in unincorporated communities, but the policies are not accompanied by analysis of the financial feasibility of financing alternatives to support improvements in DUCs in general or to meet the specific needs of individual DUCs. (DUC Report, p. I-357.)

loans. (SB 244 Technical Advisory, pp. 11-12; LCI, State of California 2017 General Plan Guidelines [General Plan Guidelines], pp. 250-54.) The SWB's Safe and Affordable Drinking Water Fund provides \$130 million in funding per year for solutions to drinking water standard violations by small systems, with a focus on systems serving disadvantaged communities.²² California's \$10 billion Climate Bond, approved by voters in 2024 through Proposition 4, will provide competitive funding for infrastructure projects that will reduce community vulnerability to climate change. At least 40% of the bond funding is reserved to support disadvantaged communities, making the Climate Bond a strong financing option to address project needs identified in an SB 244 analysis.²³ The County can also contribute to the financial feasibility of infrastructure projects in DUCs by serving as the lead agency or providing technical assistance on grant and loan applications, project environmental review, and water and wastewater system consolidations and by waiving local development fees.

III. The "Environment Justice" Goals, Policies, and Objectives Set Forth in the County's Draft Housing Element Do Not Satisfy SB 1000

The Legislature enacted Senate Bill 1000 in 2016 to ensure that cities and counties address environmental justice through the local planning process. SB 1000 mandates that general plans identify disadvantaged communities within the local jurisdiction's planning area and requires that general plans include goals, policies, and objectives (collectively "policies") to (1) reduce the unique or compounded health risks in disadvantaged communities; (2) promote civic engagement in decision-making processes; and (3) prioritize improvements and programs that address the needs of disadvantaged communities. (§ 65302, subd. (h)(1).)²⁴ Policies to reduce health risks in disadvantaged communities must reduce pollution exposures, improve air quality, promote public facilities, increase food access, provide safe and sanitary homes, and promote physical activity. (*Ibid.*) California law defines environmental justice to include "deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution," "the provision of technical assistance to populations and communities most impacted by pollution," and "at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions." (§ 65040.12, subd. (e)(2).) Local governments must amend the general plan to implement SB 1000 upon the concurrent adoption or revision of two or more elements. (§ 65302, subd. (h)(1).)

While SB 1000 permits the County to, in lieu of preparing an environment justice element, integrate environmental justice-related goals, policies, and objectives into other

²² Information about the Safe and Affordable Drinking Water Fund is available online at https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/background.html. Several state agencies, including the SWB, HCD, and the Strategic Growth Council implement grant and/or loan programs that can assist with financing infrastructure. Information about those programs is available on those agencies' websites.

²³ See V. Gonzalez, Billions in Funding Opportunities from Prop 4 Climate Bond to Take Shape, Cal. Special Districts Association (Jan. 13, 2025), <https://www.csda.net/blogs/vanessa-gonzales/2025/01/13/billions-in-funding-opportunities-from-prop-4-clim>.

²⁴ SB 1000 defines "disadvantaged communities" to include either "an area identified by [CalEPA] pursuant to [Health and Safety Code] Section 39711" or (2) "an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation." (§ 65302, subd. (h)(4)(A).)

elements, such as the housing element, SB 1000's requirements remain no less demanding for local agencies opting not to prepare a dedicated environmental justice element.²⁵ The County's General Plan, which the County adopted before SB 1000 went into effect, does not address SB 1000's requirements, and we have not identified any policies in the General Plan which appear to have been designed to do so. In addition, the information and actions labeled "environmental justice" in the County's draft Housing Element fall short for four reasons. First, the draft Housing Element fails to include any environmental justice policies to promote public facilities, food access, and physical activity in disadvantaged communities, as SB 1000 demands. As discussed above, disadvantaged communities in Stanislaus County face barriers to accessing these and other resources that provide a necessary foundation for public health.

Second, the draft Housing Element's environmental justice actions fail to address the significant pollution exposures faced by disadvantaged communities. The draft Housing Element includes just one environmental justice action relating to water and air pollution. That action, Action 1-1f, states that the County will amend its rehabilitation program guidelines "as allowed" to allow funding to be used for air and water filtration for pesticide pollution. (Draft Housing Element, p. 6-4). While pesticide exposure is a serious health issue for the County's disadvantaged communities that the County's environmental justice policies should address, it is unclear what this action will do to address the issue. The meaning of the phrase "as allowed," as used within Action 1-1f, is uncertain. Given other demands on rehabilitation program funding countywide, it is unclear how much funding this action will unlock for filtration of pollutants associated with pesticide exposure in disadvantaged communities. In addition, the draft Housing Element's environmental justice actions do not address other significant pollution exposures that impact disadvantaged communities, such as fugitive dust emissions from agricultural operations, toxic air pollution from industrial facilities and truck traffic, and soil and water contamination from aging wastewater systems. Our Office's guidance, Best Practices for Implementing SB 1000, and its Appendix A, provide example policies that other cities and counties have adopted that respond to pollution burdens impacting disadvantaged communities and which the County could consider in developing its own SB 1000 policies. (Cal. Dept. J., Best Practices for Implementing SB 1000 [SB 1000 Guidance].)²⁶

Third, the draft Housing Element's environmental justice actions use vague language and impose minimal requirements, making it unclear what, if anything, they will accomplish. This conflicts with SB 1000's mandate that jurisdictions develop policies that "reduce the unique or compounded health risks in disadvantaged communities," which necessitates clear and specific policies targeted to communities' specific needs and health risks. (§ 65302, subd. (h)(1)(A); *See* SB 1000 Guidance, p. 13.) For instance, Action 1-2a states that the County will "[a]mend the County Code, if determined necessary, to comply with" a requirement in Health and Safety Code section 17970.5 that local governments inspect a rental unit that is the subject of a habitability complaint within a certain timeframe. (Draft Housing Element, p. 6-4.) This action provides the

²⁵ During our conversation with County staff in Fall 2024, the County confirmed that it intended the draft Housing Element policies labeled "environmental justice" to partially address SB 1000's requirements.

²⁶ The California Department of Justice's Best Practices for Implementing SB 1000, including Appendix A – SB 1000 Example Policies and Appendix B – SB 1000 Tools and Resources, is available at <https://oag.ca.gov/environment/sb1000>.

County with the option to take no action at all, if the County decides that amending its Code is not necessary to comply with existing law. Further, the action does not commit the County to comply with section 17970.5, which requires the County to take actions beyond amending its code. As another example, Action 4-4c would commit the County to “develop a countywide language access policy,” but it is unclear whether and how this policy would differ from the County’s existing language access policy adopted in 2024.²⁷ (*Id.* p. 6-25.) Without further specificity or imposing any new commitments on the County, the environmental justice actions do nothing to alter the status quo and do not satisfy SB 1000’s demand that they reduce health risks, promote civic engagement, and prioritize improvements for disadvantaged communities. These environmental justice actions must be more definite and specific to qualify as “policies” under SB 1000, which LCI defines as “a specific statement that guides decision-making” and that “indicates a commitment of the local legislative body to a particular course of action.” (LCI, General Plan Guidelines, Appendix E, p. 382.)

Fourth, the environmental justice actions do not “prioritize improvements and programs that address the needs of disadvantaged communities.” (§ 65302, subd. (h)(1)(C).) Policies that meet this requirement should respond to the needs and priorities identified by residents of, and must prioritize improvements and programs in, disadvantaged communities. (*See* SB 1000 Guidance, p. 18.) Several environmental justice actions apply countywide and do not contain any provisions to ensure that the limited resources associated with the program will benefit disadvantaged communities in particular. (*See, e.g.,* Draft Housing Element, Action 1-1f, p. 6-3 [committing the County to allocate rehabilitation assistance resources to owner-occupied households].) Other than one action committing to target the County’s contracted fair housing services to several disadvantaged communities, only one environmental justice action directly references disadvantaged communities. (*Id.* p. 6-28.) But that action, Action 1-1d, commits only to developing informational materials and is ambiguous with respect to its commitment to ensure these materials reach disadvantaged communities. (*Id.* p. 6-3.) In addition, the draft Housing Element is unclear about which communities the County considers “disadvantaged communities” for purposes of SB 1000, and as a result, it is uncertain whether any policies prioritize the needs of those communities in particular.²⁸ If the County intends to use these portions of its draft Housing Element to comply with SB 1000, it must clarify what specific communities it

²⁷On July 30, 2024, the County Board of Supervisors directed County staff to implement a policy to embed Google Translate into the County’s website to support language access. At the Board of Supervisors meeting, the Grayson Neighborhood Council and other community members identified a need for the County to adopt additional measures to enhance language access in light of the significant share of residents who speak languages other than English. A report issued by the UC Davis Health Medical Center and West Modesto Community Collaborative in April 2025 echoed the need for additional measures to address linguistic barriers to civic engagement in Stanislaus County. *See* J. Bisharyan, *New report calls for economic justice in the County’s underserved communities*, The Modesto Bee, (Apr. 9, 2025), <https://www.modbee.com/news/local/article303859216.html>.

²⁸The draft Housing Element identifies census tracts which qualify as disadvantaged communities pursuant to CalEPA’s definition of disadvantaged communities under Senate Bill 535 as well as DUCs pursuant to SB 244, which the draft Housing Element refers to both as “disadvantaged unincorporated communities” and as “disadvantaged communities.” However, the draft Housing Element does not specify what communities it considers disadvantaged for purposes of SB 1000. (Draft Housing Element, pp. 3-72 to 3-75.) The Environmental Justice Technical Report, which identifies disadvantaged communities using both CalEnviroScreen as well as a local methodology which the draft Housing Element does not address, does not resolve the ambiguity. (*See* Environmental Justice Technical Report, p. 12).

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designates as disadvantaged pursuant to SB 1000 and develop policies that “prioritize” improvements and programs addressing their needs as required. (*See* § 65302, subds. (h)(1), (h)(4)(A).)

The County’s draft Housing Element states that the County will update its Safety Element to “comply with environmental justice requirements” by December 2026. (Draft Housing Element, at 6-27). Yet, as discussed in this letter, the County is obligated to develop and adopt amendments to its Land Use Element and Safety Element now pursuant to SB 244 and section 65302, subdivision (g), and the County has begun to develop those amendments. (Draft Housing Element, p. 1-1.) Therefore, the County must release draft amendments for public review and input and adopt amendments that comply with SB 1000 upon updating the Housing Element. (§ 65302, subd. (h)(2).)

IV. The County Must Update its Safety Element to Address Climate Adaptation and Flood Hazards Upon its Revision of the Housing Element

A. General Plan Climate Adaptation and Flood Hazard Planning Requirements

General plans must include a safety element “for the protection of the community from any unreasonable risks” from natural hazards. (§ 65302, subd. (g).) Pursuant to Senate Bill 379 (Jackson, 2015), codified in section 65302, subdivision (g)(4), the safety element must address climate adaptation and resilience strategies applicable to the County. First, the safety element must include a vulnerability assessment that identifies risks related to climate change within the local government’s boundaries and the geographic areas at risk from climate change impacts. (*Id.*, subd. (g)(4)(A)(i).) The safety element must include information related to climate change from certain local, state, and federal agencies; historical data relating to areas vulnerable to climate risks; and development in at-risk areas. (*Id.*, subd. (g)(4)(A)(ii).) Second, the safety element must include a “set of adaptation and resilience goals, policies, and objectives based on” the vulnerability assessment “for the protection of the community.” (*Id.*, subd. (g)(4)(B).) Third, the safety element must include a “set of feasible implementation measures designed to carry out those goals, policies and objectives.” (*Id.*, subd. (g)(4)(D).) Cities and counties must consider advice provided in LCI’s General Plan Guidelines in developing general plan amendments to comply with SB 379. (*Id.*, subd. (g)(4).)

The safety element must also specifically address flood hazards. (§ 65302, subd. (g)(2).) To do so, the safety element must identify information regarding flood hazards, including, for example, development in flood hazard zones and areas subject to inundation in the event of levee failures. (*Id.*, subd. (g)(2)(A).) Based on the flood hazard information identified, the safety element must “[e]stablish a set of comprehensive goals, policies, and objectives...for the protection of the community from unreasonable risks of flooding...” (*Id.*, subd. (g)(2)(B).) The safety element must establish feasible implementation measures designed to carry out the element’s flood hazard prevention goals, policies, and objectives. (*Id.*, subd. (g)(2)(c).) For cities and counties located within the Sacramento-San Joaquin Valley, safety elements must also reflect information and policies included within the Department of Water Resources’ Central Valley Flood Protection Plan. (*See* § 65302.9; Water Code § 9612.)

Cities and counties were required to amend their safety element upon the first revision of their respective local hazard mitigation plans on or after January 1, 2017. In addition, cities and counties must review, and if necessary, revise the safety element upon each revision of the housing element or local hazard mitigation plan thereafter, but not less than once every eight years, to incorporate new information relating to climate adaptation and resilience and flood hazards. (§ 65302, subd. (g)(6).)

B. The County Must Update its Safety Element Upon Revision of the Housing Element

The Safety Element does not meet the requirements of section 65302, subdivisions (g)(2) and (g)(4). First, the Safety Element does not include a climate risk vulnerability assessment with the information required by section 65302, subdivision (g)(4)(A).²⁹ Likewise, the Safety Element does not include required information relating to flood hazards, including information about areas subject to inundation in the event of levee or floodwall failure; historic data on flooding and sites that have been repeatedly damaged by flooding; and development in flood hazard zones. As a result, the Safety Element does not and cannot contain the required goals, policies, objectives, and implementation measures addressing climate adaptation and resilience and flood hazards “based on” the information required by section 65302, subdivisions (g)(2) and (g)(4). (§ 65302, subds. (g)(2)(B), (4)(B), (4)(C).) In addition, while the Safety Element includes certain goals and objectives broadly relating to natural hazards, the Safety Element includes no goals or objectives specifically addressing climate change or the protection of the community from flood risks. Furthermore, the Safety Element does not appear to address the Central Valley Flood Protection Plan.

In addition, the County has missed multiple deadlines to update its Safety Element to incorporate new information. The County’s website for its housing element update acknowledges that the County must update its Safety Element to reflect current information about climate adaptation and flood hazards, but it has repeatedly failed to do so.³⁰ The County’s draft Housing Element indicates that the County began to develop amendments to address the Safety Element requirements in 2022, but the draft also indicates that the County intends to miss yet another deadline to update the Safety Element by waiting to adopt revisions until sometime after it adopts its revised Housing Element. (Draft Housing Element, pp. 1-2, 6-27; Draft Housing Element, Appendix A, pp. A-2, 3.)

Significant new information has arisen relating to climate risks and flood hazards in Stanislaus County since the County adopted the Safety Element in 2016. In 2022, the

²⁹ The Safety Element states that the County’s Multi-Jurisdictional Hazard Mitigation Plan includes additional information about flood and wildfire hazards and additional adaptation strategies, but the Safety Element does not include that information in the Safety Element or demonstrate how the MJHMP meets the specific requirements of section 65302(g)(4) relating to climate adaptation and resilience. (Safety Element, p. V-13.)

³⁰ The County was required to review and update its Safety Element’s climate adaptation and resiliency provisions in 2022, when the County adopted its current MJHMP. The County was also required to update its Safety Element provisions relating to climate change and flood hazards by August 23, 2024, eight years after the County adopted the Safety Element on August 23, 2016. Nevertheless, the County has never updated its Safety Element to address these requirements.

Department of Water Resources adopted an extensive update to its Central Valley Flood Protection Plan.³¹ In addition, academic research published that year found large swaths of land in the Sacramento and San Joaquin River watersheds highly susceptible to large-scale flooding, and that climate change is increasing those flood risks.³² And in 2023, CalMatters reported that the threat of devastating flooding in the Central Valley is growing as levees age and erode.³³ In recent years, mobile home parks located along the Tuolumne and San Joaquin Rivers in Stanislaus County have been evacuated due to flooding.³⁴ The County also has new information available to it relating to flooding in the Airport Neighborhood from the County's application for statewide Active Transportation Program funding in 2019. New information is also available relating to extreme heat, drought, air quality, public health and other impacts associated with climate change and on vulnerable populations and disadvantaged communities in particular.³⁵

The County must develop and adopt revisions to its Safety Element to address this and other new information relating to climate adaptation and resilience and flood hazards and revise its goals, policies, objectives, and implementation measures accordingly, consistent with section 65302, subdivision (g). The County could consider example policies included in our Office's SB 1000 Best Practices Guidance in developing amendments to satisfy section 65302, subdivision (g). For instance, the County could consider policies to support the development and operation of "resilience hubs" that provide space and safety for community members during extreme weather events, while also offering recreational opportunities. (SB 1000 Guidance, p. 15.) As other examples, programs to prioritize planting of, and care for, street trees and vegetation in communities with limited tree canopies and to support the weatherization of mobile homes can also help protect residents from extreme heat and flood risks. (*Id.*, Appendix A) The County must not miss another deadline to update its Safety Element in compliance with section 65302, subdivision (g) — and it must update its Safety Element no later than its next revision of its Housing Element.

³¹The 2022 Central Valley Flood Protection Plan is available at https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Flood-Management/Flood-Planning-and-Studies/Central-Valley-Flood-Protection-Plan/Files/CVFPP-Updates/2022/Central_Valley_Flood_Protection_Plan_Update_2022_ADOPTED.pdf.

³²X. Huang, et al., Climate change is increasing the risk of a California megaflood, *ScienceAdvances* (Aug. 12, 2022), at <https://www.science.org/doi/10.1126/sciadv.abq0995>.

³³A. Bland, *As Floods Endanger the San Joaquin Valley, Newsome Cuts Funding for Flood Plains*, CalMatters (Mar. 29, 2023), <https://calmatters.org/environment/water/2023/03/california-floods-funding-cut-san-joaquin-valley/>.

³⁴D. Macht, *Stanislaus County Issues Evacuation Order for Newman Area of San Joaquin River*, KCRA3 (Mar. 8, 2023), <https://www.kcra.com/article/stanislaus-county-issues-evacuation-order-for-newman-area-of-san-joaquin-river/43253310>; J. Holland, *Storm Updates: Stanislaus County Shares Weather Service Warning of Possible Funnel Clouds*, The Modesto Bee (Mar. 10, 2023), <https://www.modbee.com/news/weather-news/article272960355.html>.

³⁵See e.g., California's 4th Climate Change Assessment, San Joaquin Valley Regional Report (May 2021), https://www.energy.ca.gov/sites/default/files/2022-01/CA4_CCA_SJ_Region_Eng_ada.pdf; K. Carlson, *Blistering Heat Could Shatter Records in Stanislaus County. Is There an End in Sight?* The Modesto Bee (Jul. 3, 2024), <https://www.modbee.com/news/weather-news/article289716379.html>; K. Moyers, *An invisible surcharge: Climate warming increases crop water demand in the San Joaquin valley's groundwater-dependent irrigated agriculture*, PLOS Water 3(3), <https://doi.org/10.1371/journal.pwat.0000184>; K. Carlson, *Warmer Climate Makes Asthma Symptoms Worse for Patients in Stanislaus County, Experts Say*, The Modesto Bee (Sept. 5, 2023), https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-003_SanJoaquinValley_Preview_ADA.pdf.

V. The County Should Update the General Plan's Air Quality Provisions to Satisfy Section 65302.1

Section 65302.1 aims to address the San Joaquin Valley's "serious air quality problem" by requiring cities and counties located within the jurisdictional boundaries of the San Joaquin Valley Air Pollution Control District (District) to "include data and analysis, goals, policies, and objectives, and feasible implementation measures to improve air quality" in their general plans. (§ 65302.1, subs. (a)(1), (b).) Specifically, AB 170 requires that general plans include the following: (1) a report with air quality monitoring data, emissions inventories, and other information; (2) a summary of local, district, state, and federal policies, programs, and regulations that may improve air quality; (3) a "comprehensive set of goals, policies, and objectives that may improve air quality"; and (4) a "set of feasible implementation measures designed to carry out those goals, policies, and objectives." (§ 65302.1, subd. (c)(1)-(4).) The goals, policies, and objectives to improve air quality must be consistent with the air quality improvement strategies set forth in section 65302.1, which include, for example, planning land uses to minimize exposures to toxic air pollutant emissions and to support a multimodal transportation system and reducing particulate matter emissions. (§ 65302.1, subd. (a)(3), (c), (e).) Before adopting general plan air quality amendments, cities and counties must provide draft amendments to the District for review and input. (§ 65302.1(d).)

The General Plan does not comply with section 65302.1's requirements for several reasons. First, it does not include an air quality report or a summary of local, state, and federal policies and programs to improve air quality. Second, the General Plan lacks "comprehensive" goals, policies, and objectives to improve air quality. The General Plan appears to include a single goal aimed at improving air quality, Conservation/Open Space Element Goal 6, and Goal 6 states simply, "Improve air quality." (Conservation/Open Space Element, p. III-16). The Conservation/Open Space Element includes several air quality policies and implementation measures. However, those policies and implementation measures generally describe actions already required of the County under the law, and they fail to commit the County to specific actions to improve air quality consistent with the strategies set forth in section 65302.1 (*e.g.*, one policy states that the County will "strive to accurately determine and fairly mitigate the local and regional air quality impacts of proposed projects," and another states that the County will "refer discretionary projects under CEQA review to the [District]"). (*Id.* pp. III-16, 17.) Third, it is unclear whether the County provided draft air quality amendments to the District or considered input from the District relating to its amendments.³⁶

Given the poor air quality that impacts many communities in Stanislaus County, the County should develop and adopt amendments to comply with section 65302.1. These amendments should address each of the air quality strategies set forth in AB 170. The County's goals, objectives, policies, and implementation measures could address, for instance, fugitive dust emissions and pesticide impacts to farmworkers and communities from agricultural

³⁶ See Stanislaus County General Plan and Airport Land Use Compatibility Plan Update, Final Program Environmental Impact Report (Jul. 2016) (describing District comments notifying the County of its duty to prepare and send the District draft amendments for review and comment pursuant to AB 170 and providing the County's response that, "[t]his is not a comment on the EIR, and no response is required in the FEIR."), pp. 2-51, 52.

operations; emissions from the siting and operation of industrial and waste management operations; and diesel particulate matter and other air emissions associated with heavily-trafficked roadways. The policies could also incorporate strategies to reduce exposures within homes, daycares, and other sensitive receptors. Appendix A to our Office’s SB 1000 Guidance includes example policies to improve air quality which the County could consider (*see, e.g.,* National City, LU-3.2 [“prevent the intrusion of new incompatible land uses in residential areas...”]).³⁷ Additionally, the County should consult with the District and other relevant agencies to assist it in developing amendments to comply with law’s requirements and develop effective air quality policies.

VI. The County Must Engage the Community to Develop Compliant General Plan Amendments

To develop legally compliant General Plan amendments, the County must consult directly with and incorporate input from community members with knowledge of environmental justice and climate issues in Stanislaus County. (§ 65351; *see also* §§ 65301, subd. (c) [requiring general plans’ specificity to reflect local conditions]; 65040.12, subd. (e)(1) [defining environmental justice to include the meaningful involvement of people of all races, cultures, incomes, and national origins].) The County should engage residents, community-serving organizations, and other community stakeholders to identify disadvantaged communities and develop policies to address the “unique or compounded health risks” those communities face, pursuant to SB 1000. Similarly, the County must consult with residents and other individuals with direct knowledge to identify disadvantaged unincorporated communities and understand the infrastructure and service needs and deficiencies in those communities, as required by SB 244. Community input about the air quality, flood hazards, and climate adaptation issues in Stanislaus County and effective policies to protect the community will also be invaluable to the County in developing amendments that satisfy section 65302, subdivision (g), and section 65302.10. The County should make draft amendments available for public review and input and should meaningfully consider and incorporate public input into its amendments to comply with the law and further environmental justice. (*See* § 65040.12, subd. (e)(2)(d); SB 1000 Guidance, p. 8.)

Our Office’s SB 1000 Guidance provides recommendations for ways local governments can conduct effective community engagement to address SB 1000’s requirements and further environmental justice. (SB 1000 Guidance, pp. 5-8.)³⁸ Many of the recommendations in that guidance are applicable to the County’s development of General Plan amendments pursuant to SB 244, section 65302, subdivision (g), and section 65302.10. To promote efficiency and help

³⁷The Bay Area Air Quality Management District’s guidance, *Best Practices for Centering Environmental Justice, Health, and Equity* (2022), also provides resources and examples of air quality mitigation measures. Though the guidance specifically addresses environmental review under the California Environmental Quality Act, its information relating to available air quality improvement measures has broader applications. *Best Practices for Centering Environmental Justice, Health, and Equity* is available at <https://www.baaqmd.gov/news-and-events/page-resources/2023-news/042523-ej-guidance>.

³⁸HCD’s *Affirmatively Further Fair Housing Guidance for All Public Entities and for Housing Element* (April 2021 Update) (AFFH Guidance) also provides useful guidance regarding effective community engagement strategies consistent with cities and counties’ duty to affirmatively further fair housing. HCD’s AFFH Guidance is available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

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achieve consistency across its General Plan amendments, we encourage the County to implement a coordinated approach to community engagement to develop amendments addressing interrelated statutory planning requirements pertaining to environmental quality, environmental justice, and climate change.

VII. Conclusion

The County has missed mandatory deadlines to review and update its Land Use Element's SB 244 analysis and its Safety Element's climate adaptation and flood hazard analysis and policies. In addition, the General Plan and draft Housing Element do not satisfy SB 1000, and the General Plan falls short of the County's duties to adopt policies to improve air quality. The County must promptly develop General Plan amendments to comply with these requirements and must not miss additional deadlines to update its Safety Element upon adoption of its 6th cycle Housing Element. Moreover, to develop these amendments, it is crucial that the County meaningfully engage residents of disadvantaged communities and vulnerable populations to ensure the amendments address the applicable statutory requirements and satisfy the law's intent to protect communities and advance environmental justice. Please let me know if you have any questions or would like to schedule a call to discuss this letter.

Sincerely,



ASHLEY WERNER
Deputy Attorney General

For ROB BONTA
Attorney General