



**COUNTY OF LAKE**  
**BOARD OF SUPERVISORS**  
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January 13, 2026

Linda Penner, Chair  
Board of State and Community Corrections  
2590 Venture Oaks Way  
Sacramento, California 95833

*SENT BY EMAIL, TO: [publiccomment@bscc.ca.gov](mailto:publiccomment@bscc.ca.gov); and [Linda.Penner@bscc.ca.gov](mailto:Linda.Penner@bscc.ca.gov)*

**RE: Letter of OPPOSITION to Proposed Title 15 and Title 24 Regulatory Changes**

Dear Chair Penner:

We are writing to express our concern currently proposed regulation revisions extend beyond minimum standards, lack the clarity necessary for successful implementation and are likely to reduce meaningful and affordable capacity statewide to house and treat youth and young adults with the most serious needs under our system of care.

As currently drafted, the work product appears impose State requirements on local operations that run opposed to the best interests of youth. Let us not forget, Counties have been mandated to expand our entire Juvenile Justice Continuum to cover the huge void left when the State hastily closed all State-run Juvenile Facilities; locally operated programs have grown capacity to serve local populations, and these decisions should continue to be made at the local level.

Maintaining family and community connections is imperative and core to our service of justice-involved youth; the Lake County Probation Department excels in this area, and strives to exceed state minimums and apply best practices wherever possible. Proposed revisions to Title 15 and 24 regulations mistake minimum standards for best practices, and would represent a step backward.

Further, a regulatory revision process should not be used to mandate policies outside of the Legislative process, especially where there is no funding to support its implementation and impact analysis is insufficient.

The Lake County Board of Supervisors is concerned the practical effect of these regulations will be to fiscally preclude smaller counties from operating facilities within their jurisdictions, while larger facilities that serve multiple counties may be forced to reevaluate their ability to continue doing so. Increased costs, staffing pressures, and threat of liability all become worse under the current proposal, not better. This will very likely result in youth needing to be placed further from their homes and families.

You will agree, regulations should define attainable, clear and objective minimum standards for services and support that all facilities can realistically achieve; as drafted, our Board fears these changes may do the opposite. Therefore, we request your Board reject the proposal, and instead seek appropriate input from Counties to better serve justice-involved youth.

Respectfully,

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Chair  
Lake County Board of Supervisors  
COUNTY OF LAKE