



California Is Not Adequately Prepared to Protect Its Most Vulnerable Residents From Natural Disasters

December 2019

EMERGENCY PLANNING

REPORT 2019-103





CALIFORNIA STATE AUDITOR

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December 5, 2019
2019-103

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As directed by the Joint Legislative Audit Committee, my office conducted an audit of three counties—Butte, Sonoma, and Ventura—to assess how well prepared each county is to protect vulnerable populations before, during, and after a natural disaster. During a natural disaster, some people have needs—known as *access and functional needs*—that cannot be met by traditional emergency response and recovery methods. These access and functional needs come from a variety of circumstances, such as disabilities, limited English proficiency, transportation disadvantages, and older age. Although everyone is vulnerable during a natural disaster, people with access and functional needs are even more vulnerable. This report concludes that, despite guidance from the Federal Emergency Management Agency (FEMA) and the California Governor’s Office of Emergency Services (Cal OES), these three counties have not adequately implemented best practices for protecting vulnerable populations, which may place their residents at greater risk of harm during future natural disasters.

Before some of California’s most recent and significant wildfires, none of the three counties we reviewed had complete, up-to-date plans for alerting and warning their residents about danger from natural disasters, conducting evacuations, or sheltering evacuees. Further, none of the counties had conducted assessments of their respective populations to determine what access and functional needs existed in their communities, prearranged for evacuation assistance to meet those needs, or fully prepared to send critical warning messages. Inadequate preparation likely hindered the counties’ responses to the 2018 Camp Fire, the 2017 Sonoma Complex fires, and the 2017 Thomas Fire. For example, despite the critical nature of evacuation messages, none of the counties sent evacuation notices in languages other than English during these events. In the time since these wildfires, each county has taken some steps to follow best practices for meeting access and functional needs, but none have fully implemented these practices.

Despite the importance of planning for people with access and functional needs, Cal OES has not provided adequate support to local jurisdictions in developing emergency plans to meet those needs. It has neither complied with key state laws requiring it to provide guidance to local jurisdictions, nor has it published lessons learned from natural disasters so that local jurisdictions can learn from others’ successes and challenges in responding to emergencies. These failures leave local jurisdictions without key resources that could help them develop plans to protect people with access and functional needs during future natural disasters.

It is important that readers understand the scope of this report. We did not evaluate or reach conclusions about fault or liability, nor did we review specific claims or assess whether the State or any of the three counties we visited breached any legal duty of care. We focused our review on the implementation of best practices prior to emergency events. By implementing best practices in their current planning efforts, counties can be better prepared for future disasters, and in particular, the specific concerns of those with access and functional needs.

Respectfully submitted,

A handwritten signature in black ink that reads "Elaine M. Howle". The signature is written in a cursive, flowing style.

ELAINE M. HOWLE, CPA
California State Auditor

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Summary

Results in Brief

In recent years, California has experienced an increase in the frequency and destructive nature of wildfires. Experts predict that the recent trend of increased frequency and severity of wildfires will continue, requiring the State to be prepared to protect its residents more often from more dangerous natural disasters than it has in the past. The State's emergency management system designates local governments—such as counties—as primarily responsible for emergency preparedness and response. In that role, the local governments should develop emergency response plans (emergency plans) that adequately prepare them to protect all residents, including the most vulnerable. We reviewed the extent to which three counties'—Butte County (Butte), Sonoma County (Sonoma), and Ventura County (Ventura)—emergency planning incorporated best practices and the effect that not following those best practices had on their responses to recent wildfires. We determined that the counties have not adequately followed key practices for emergency planning, including having emergency plans for alerting, evacuating, and sheltering residents and assessing the needs of their communities in advance of disaster events. As a result, the counties are less prepared for future natural disasters, which may place the residents for whom they are responsible at greater risk of harm.

In particular, the three counties have not adequately prepared to protect people with needs that cannot be met by traditional emergency response and recovery methods. Within the emergency management community, those needs are referred to as *access and functional needs*. Under state law, people with access and functional needs include, among others, older adults and people with disabilities, chronic conditions, temporary injuries, and limited English proficiency. Although everyone is vulnerable during a natural disaster, people with access and functional needs are even more vulnerable. As a result, these individuals have historically been disproportionately affected by natural disasters. The United Nations reports that people with certain access and functional needs are more likely to die from these events. During past events, emergency response agencies have struggled to assist them.

However, none of the counties we reviewed have implemented key best practices from the Federal Emergency Management Agency (FEMA) and other organizations to ensure that their emergency plans fully address the access and functional needs of the people in their communities. These practices include involving representatives of people with such needs in the emergency planning processes. These representatives are best positioned to provide insight about how counties can effectively meet access and

Audit Highlights . . .

Our audit of three counties assessing their emergency planning to protect vulnerable populations before, during, and after natural disasters revealed the following:

- » *The three counties did not have complete, updated plans for alerting, evacuating, and sheltering their residents before recent wildfires—the 2018 Camp Fire, 2017 Sonoma Complex Fires, and 2017 Thomas Fire.*
- » *Despite guidance from FEMA and other organizations, none of the counties used key best practices for emergency planning to protect their most vulnerable residents during natural disasters.*
 - *None of the counties had completed an assessment of their populations to determine the needs that their communities will have during an emergency.*
 - *In developing emergency plans, the counties did not involve community representatives of people with a variety of access and functional needs to provide insight.*
 - *The counties did not assess the resources needed to assist people with access and functional needs during a natural disaster, such as accessible transportation and shelter resources.*
- » *Cal OES has failed to provide important resources to help local jurisdictions in planning, even though in some cases it is required to do so by state law.*
 - *It has not provided guidance related to strategies for identifying people with access and functional needs and for evacuating people with disabilities.*

continued on next page . . .

- *It has not published after-action reports that include lessons learned from natural disasters so local jurisdictions can learn from others' successes and mistakes.*
- *It has not followed best practices for involving people with access and functional needs when developing emergency plans to meet those needs.*

functional needs during a natural disaster. Despite this valuable perspective, none of the three counties adequately engaged with representatives of individuals with a variety of access and functional needs in their community when developing their emergency plans.

We recognize that no amount of planning or preparation will guarantee success during a natural disaster. This is particularly true when the natural disaster is historic in size and scope, as has been the case in each of these three counties in the past two years. Each county we reviewed recently experienced wildfires that were among the most destructive or deadly in the history of California—the 2018 Camp Fire in Butte, the 2017 Sonoma Complex Fires in Sonoma, and the 2017 Thomas Fire in Ventura. Moreover, determining if any additional lives would have been saved during these events if the counties had planned differently or more fully implemented best practices is impossible, and we reach no conclusion to that effect. In fact, FEMA acknowledges that using a prescribed planning process cannot guarantee success. However, it also notes that inadequate plans and insufficient planning are proven contributors to failure. Therefore, deficiencies in a county's efforts to prepare for a natural disaster can impair its ability to respond when the disaster occurs.

For example, each county lacked a completed, updated plan for issuing evacuation warnings and each had deficiencies in the way it issued warnings to the public during these historic disasters. During those wildfires, none of the counties issued warnings directing people to evacuate in languages other than English. As a result, some people likely did not receive potentially life-saving emergency information in a language that they could understand. Moreover, despite having access to technology that could reach all cell phones in their evacuation zones, Butte and Sonoma did not send alerts using that technology. Instead, both counties sent messages through notification systems that reach landlines and reach a person's cell phone only if that person has preregistered to receive emergency alerts from the county.

Further, we identified similar deficiencies in the three counties' preparedness for evacuating and sheltering people with access and functional needs. FEMA's best practices state that counties should assess what resources they will need to assist such people during evacuations and sheltering. These resources include accessible transportation options for evacuation assistance and accessible cots, showers, and toilets for emergency shelters. According to best practices, counties should ensure that those resources will be quickly available during natural disasters by prearranging agreements with vendors or other organizations, yet none of the counties we visited have established a full set of agreements for those resources. Butte has established several agreements

for shelter resources, but it lacks any prearranged agreements for transportation to assist evacuation. Similarly, Sonoma and Ventura have no prearranged agreements for transportation and lack key agreements for shelter resources.

Some of the deficiencies that we found at the counties—such as not having evacuation plans or not issuing effective alert and warning messages—affect all their residents, not just those with access and functional needs. As natural disasters grow in severity and frequency, the potential effects of being underprepared also grow. Therefore, it is critical that the State also do more to ensure that local jurisdictions are as prepared as possible. Unlike in California, state laws in Florida and Texas require their state emergency management division to establish standards for and periodically review local jurisdictions' emergency management plans. A similar requirement in California could direct the California Governor's Office of Emergency Services (Cal OES) to review and provide feedback to local emergency management agencies on the extent to which their plans effectively incorporate emergency management best practices, especially related to protecting and assisting people with access and functional needs.

Cal OES is the State's lead agency for emergency management, and its mission is to protect lives and property, build the State's emergency response capabilities, and support communities. Although Cal OES has issued some guidance and tools for assisting local jurisdictions in developing emergency plans to meet access and functional needs, it has not done enough to fulfill its mission with respect to protecting these vulnerable populations. Specifically, Cal OES has not taken key steps to provide support to local jurisdictions.

First, Cal OES has failed to provide important resources to help local jurisdictions in planning, even when state law has required it to do so. For example, Cal OES has not complied with state law requiring it to provide guidance to local jurisdictions related to strategies for identifying people with access and functional needs and for evacuating people with disabilities. As a result, local jurisdictions—like those that we reviewed—may struggle to adequately plan for how to best assist those people. Until Cal OES complies with the requirements in state law, it will not have fulfilled its purpose of providing support and technical assistance to local jurisdictions as they plan for disasters.

Additionally, Cal OES has not followed best practices for involving people with access and functional needs in developing its own plans and guidance. Instead of including representatives of such persons in developing its guidance documents, Cal OES relies on a single individual—the chief of its Office of Access and Functional Needs—

to inform its guidance. As a result, the guidance it recently released on alerting and warning did not feature strategies or specific guidance for how to alert people with hearing impairments. Local jurisdictions rely on Cal OES's plans and guidance to determine how to conduct their own planning. If Cal OES's plans and guidance do not fully address access and functional needs, local jurisdictions' plans may not either.

Finally, Cal OES has not disseminated after-action reports that include lessons learned from natural disasters to help local jurisdictions learn from the successes and mistakes of others. Implicit in Cal OES's mission to protect lives, build capabilities, and support communities is a responsibility to identify and take proactive steps to correct problems in emergency management that may jeopardize the lives of residents, including those with access and functional needs. Despite a state law requiring Cal OES to issue after-action reports within 120 days of the end of a disaster, the most recent disaster for which it has completed an after-action report occurred in February 2015, and it did not complete that report until May 2019—more than four years after the disaster occurred. As a result, it has missed an opportunity to assist local jurisdictions in adapting their plans based on the lessons learned by other jurisdictions.

Summary of Recommendations

Legislature

The Legislature should require Cal OES to review all counties' emergency plans to determine if they are consistent with best practices and provide necessary technical assistance to counties.

The Legislature should require Cal OES to involve organizations representing individuals with a variety of access and functional needs in the development of the state emergency plan and guidance for local jurisdictions and to annually disseminate guidance based on lessons learned from natural disasters.

Counties

To ensure that they are adequately prepared to protect vulnerable populations during a natural disaster, each county should revise its emergency plans by following best practices for planning to meet the access and functional needs of its residents, including involving people with those needs in its planning process and developing strategies for alerting, evacuating, and sheltering them.

To ensure that its future emergency planning efforts more fully address access and functional needs, each county should adopt county ordinances that require it to adhere to the best practices and guidance issued by FEMA, Cal OES, and other authorities when conducting such planning.

Cal OES

Cal OES should, by no later than June 2020, issue the guidance related to access and functional needs to local jurisdictions that state law requires it to produce.

Agency Comments

Each of the counties expressed concerns about our conclusions that they are not adequately prepared to protect vulnerable populations and that inadequate preparation affected their response to recent wildfires. Neither Butte nor Ventura consistently indicated whether they plan to implement our recommendations. Sonoma generally agreed with our recommendations. Cal OES strongly disagreed with our conclusion that it has not adequately supported local jurisdictions in planning to meet access and functional needs and indicated that it would not fully implement our recommendation to provide all of the guidance that state law requires it to provide to local jurisdictions.

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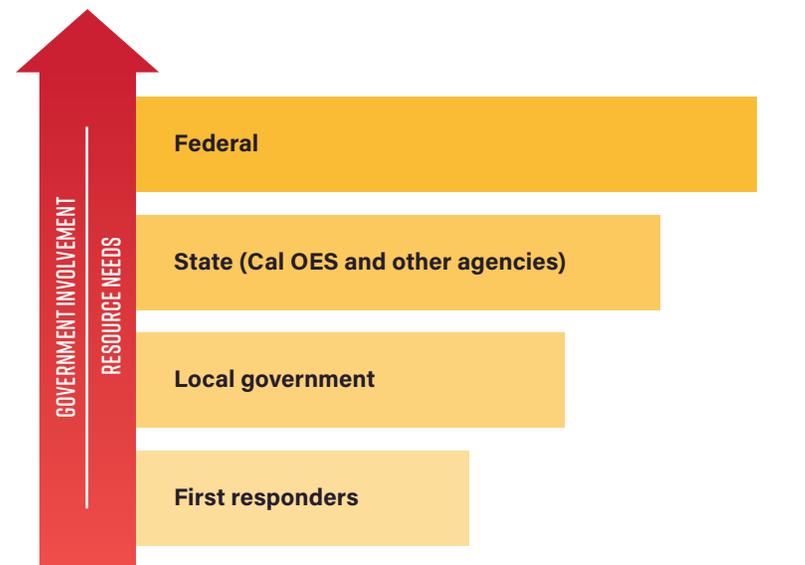
Introduction

Background

California is susceptible to a variety of natural disasters, the most prevalent and destructive of which are earthquakes, floods, and wildfires. In recent years, California has experienced an increase in the frequency and severity of wildfires, and experts project that these events will continue to occur more frequently. Consequently, the State will likely need to protect its residents more often and from more dangerous natural disasters in the future than it has in the past.

California’s emergency response system, which is known as the Standardized Emergency Management System (SEMS), mirrors the federal government’s National Incident Management System (NIMS). The Federal Emergency Management Agency (FEMA) manages the federal system, which is the nation’s comprehensive approach to emergency management and applies to all levels of government, including cities, counties, and states. Under the State’s emergency management system, local governments—which include cities, counties, and special districts—are primarily responsible for emergency response. As Figure 1 demonstrates, when a natural disaster exceeds a local government’s capacity to manage it, the local government may request assistance from the next level up in the emergency management system.

Figure 1
As Resource Needs Increase, Higher Levels of Government Become Involved in Emergency Management



Source: State law, state emergency management system guidelines, and the state emergency plan.

The California Governor’s Office of Emergency Services (Cal OES) is responsible for the State’s emergency and disaster response services, including activities necessary to respond to and recover from natural disasters and other emergencies. One of Cal OES’s critical duties is to develop and maintain the State’s emergency plan (state plan). The state plan describes how the State will perform a variety of emergency support functions (emergency functions) and identifies the emergency functions for which specific state agencies, including Cal OES, are responsible. For example, Cal OES is the lead agency responsible for coordinating resources to support local jurisdictions before, during, and after emergencies, such as through locating and delivering emergency response supplies and equipment; distributing federal emergency management funding; and coordinating the State’s efforts related to emergency communications, fire response and rescue, and long-term recovery. Other state agencies have roles in disaster response as well: for instance, the California Health and Human Services Agency is responsible for coordinating actions to assist responsible jurisdictions in meeting the needs of evacuees displaced during disasters. These needs may relate to food assistance, sheltering, and recovery.

Natural Disasters and Individuals With Access and Functional Needs

When a natural disaster occurs, some people may have needs that cannot be met by traditional emergency response and recovery methods. The emergency management community refers to those needs as *access and functional needs*. As the text box describes, people may have access and functional needs for a variety of

reasons. Emergencies have different effects on people with different types of needs. Figure 2 provides examples of the types of access and functional needs that individuals may have during an emergency.

Although everyone is vulnerable during a natural disaster, people with access and functional needs are more vulnerable than others because of those needs. Past events have shown that these individuals are disproportionately affected by natural disasters. The United Nations reports that people with certain access and functional needs are two to four times more likely to die as a result of a natural disaster. Such people can represent a substantial portion of the population. Consequently, ensuring that emergency plans contain strategies for protecting and assisting these vulnerable populations is critical. However, as Figure 3 shows, emergency response

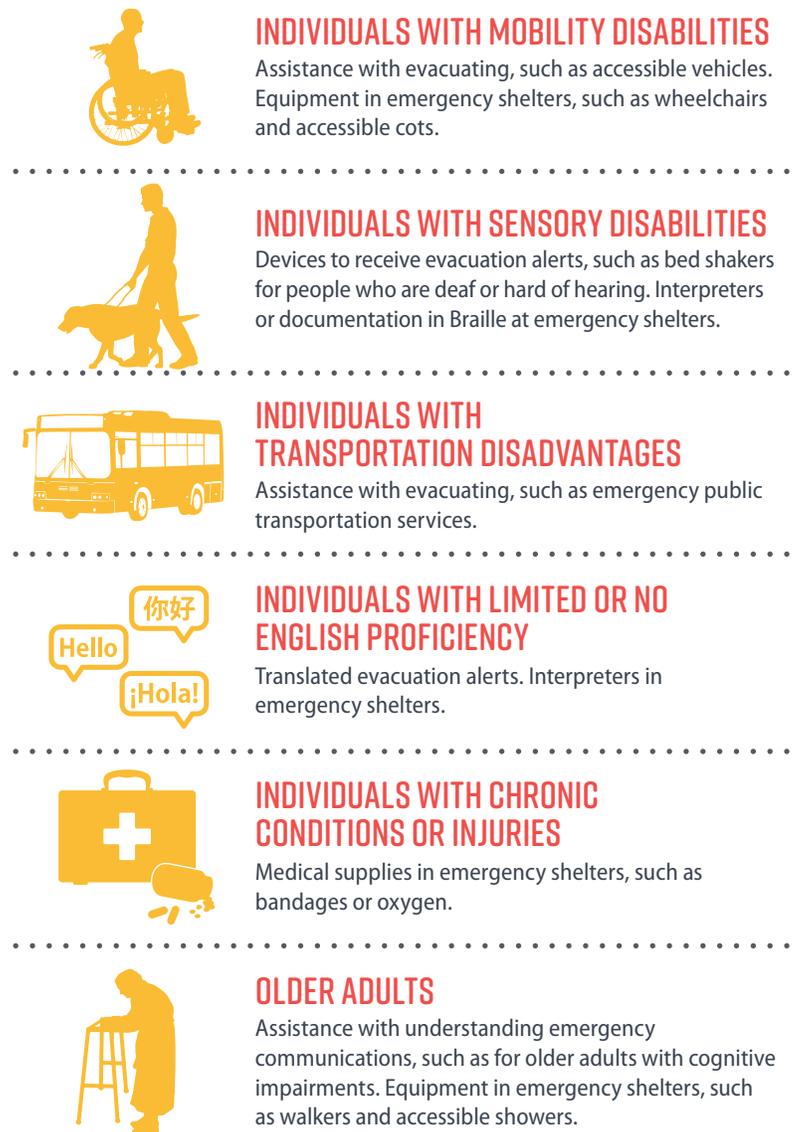
Individuals Can Have Access and Functional Needs Due to:

- Developmental or intellectual disabilities
- Physical disabilities
- Chronic conditions
- Injuries
- Limited or no English proficiency
- Age, including older adults and children
- Living in institutionalized settings
- Low income
- Homelessness
- Transportation disadvantages, including dependency on public transportation
- Pregnancy

Source: State law.

agencies have historically struggled to adequately assist people with access and functional needs during natural disasters. Of particular note in these disasters are three key areas of emergency response and recovery in which their needs were not always met: alerting and warning, evacuating, and sheltering.

Figure 2
Individuals With Access and Functional Needs May Require a Variety of Services in Natural Disaster Situations



Source: FEMA, Cal OES, and nongovernmental organization guidance on emergency planning.

Figure 3

For Many Years, Emergency Response Agencies Have Struggled to Assist People With Access and Functional Needs

Emergency response agencies have struggled to meet access and functional needs in the areas of . . .

			EMERGENCY INFORMATION	EVACUATION ASSISTANCE	EMERGENCY SHELTERS
Hurricane Irma	August	2017		X	X
Napa earthquake	August	2014			X
Hurricane Sandy	October	2012		X	
Massachusetts tornado	June	2011	X		X
Southern California wildfires	October	2007	X		X
Hurricane Katrina	August	2005	X	X	X
Southern California wildfires	October	2003		X	X
Northridge earthquake	January	1994			X
Loma Prieta earthquake	October	1989			X

Source: After-action reports published by city, county, and state governments, and external reviews of disaster response and recovery by FEMA, the Government Accountability Office, the California State Independent Living Council, and the National Council on Disability.

Struggles to meet individuals’ access and functional needs received national attention following Hurricane Katrina in August 2005. One of the most destructive natural disasters in American history, Hurricane Katrina is estimated to have caused more than 1,800 fatalities. A report from the U.S. Department of Homeland Security on the federal response to Hurricane Katrina stated that 71 percent of the fatalities in Louisiana—where the majority of the fatalities occurred—were people over the age of 60. Further, the National Council on Disability—an independent federal agency charged with advising the federal government on policies and programs that affect people with disabilities—reported that a disproportionate number of the people who died had disabilities. Reviews of the emergency response to Hurricane Katrina revealed significant gaps in agencies’ preparedness to protect people and,

in some cases, specifically people with access and functional needs. For example, some people who were deaf were unable to understand important emergency information.

In response to gaps in emergency preparedness and response, Congress passed the Post-Katrina Emergency Management Reform Act of 2006 (Reform Act). The Reform Act contained provisions for improving planning to meet access and functional needs. Among other things, the Reform Act required various federal departments—including FEMA and the Federal Highway Administration—to develop guidelines for emergency management that include consideration of individuals with disabilities. Although the Reform Act directs many of its requirements at federal departments, it also requires states that receive federal funding for preparedness assistance to annually report to FEMA on their level of overall preparedness, including an assessment of the state’s compliance with NIMS. This assessment includes, for example, the percentage of local jurisdictions that have adopted NIMS, whether the state has implemented a NIMS training program, and what actions the state has taken to support inventorying emergency response resources.

California’s Efforts to Meet Access and Functional Needs

Following Hurricane Katrina, California also made changes to improve its emergency response for people with access and functional needs. In 2008 Cal OES established its Office of Access and Functional Needs, which, as of July 2019, had five full-time staff positions and is led by the chief of that office. According to the state plan, the purpose of that office is to identify the access and functional needs individuals may have before, during, and after disasters and to integrate disability needs and resources into the State’s emergency management systems. Since its inception, the office has published guidance documents and developed a training course on how local jurisdictions should integrate those needs into emergency planning.

More recently, in August 2019, Cal OES and California Volunteers—the state office that manages programs and initiatives aimed at increasing the number of Californians engaged in service and volunteering—awarded \$50 million in local disaster resilience grants and announced the official launch of the State’s new emergency preparedness campaign, known as *Listos California* (which translates to “Ready California”). According to the award announcement, Cal OES awarded \$19 million to community-based organizations that will organize vulnerable and underserved communities in establishing preparedness strategies that reflect their access and functional needs. According to the Governor’s related press release, the purpose of these efforts is to build resiliency in vulnerable communities that are at high risk for wildfires and other disasters. The community-based

organizations receiving this money are required to report their progress to Cal OES each quarter until January 2021. Cal OES and California Volunteers awarded the remaining \$31 million for purposes such as funding citizen emergency response teams that assist their neighbors before and during disasters, and building a statewide preparedness campaign that is linguistically and culturally appropriate.

Recent Natural Disasters in the Three Counties We Reviewed

The Joint Legislative Audit Committee (Audit Committee) requested that we review three counties' emergency plans to determine the extent to which those plans follow federal and state law as well as best practices in meeting individuals' access and functional needs during natural disasters. We selected three counties that had experienced recent and significant natural disasters: Butte County (Butte), Sonoma County (Sonoma), and Ventura County (Ventura). Each of these counties has had multiple natural disasters in the last five years, including wildfires and severe winter storms. In our review, we focused on recent wildfires that were devastating and unprecedented: the November 2018 Camp Fire in Butte; the October 2017 Sonoma Complex Fires in Sonoma, which included the Tubbs Fire and the Nuns Fire; and the December 2017 Thomas Fire in Ventura. As Table 1 shows, these fires were among the most deadly and destructive in California history. At the times that the Tubbs Fire and Thomas Fire occurred, they were ranked as the most destructive and largest wildfires, respectively, in the history of the State. The Camp, Sonoma Complex, and Thomas Fires all spread rapidly, with strong winds driving each fire's progression. Although thousands of firefighters responded, the size and speed of the fires strained the firefighters' ability to quickly contain them.

Table 1
Butte, Sonoma, and Ventura Recently Experienced Three of the Most Destructive and Deadly Wildfires in California's History

NAME	COUNTY	DATE	HISTORICAL RANK	
			MOST DESTRUCTIVE	DEADLIEST
Camp	Butte	November 2018	1st	1st
Tubbs*	Sonoma	October 2017	2nd	4th
Nuns*	Sonoma	October 2017	9th	†
Thomas	Ventura	December 2017	10th	†

Source: California Department of Forestry and Fire Protection reports.

* These fires were two of the largest among a group of fires that are collectively known as the Sonoma Complex Fires.

† These fires do not rank among the 10 deadliest wildfires.

The Audit Committee asked us to determine the number of casualties that resulted from natural disasters in the last five years. As Table 2 shows, the majority of these fatalities involved older individuals. As of the date of this report, the three counties were in different stages of recovery. Sonoma and Ventura have turned to rebuilding. As of October 2019, Butte still had two shelters operating at campground facilities that were housing evacuees from the Camp Fire who were waiting to transition to more permanent housing arrangements.

Table 2
The Majority of Natural Disaster Fatalities in the Last Five Years in the Three Counties Were Older Adults

COUNTY	FATALITIES	FATALITIES 65 YEARS OF AGE OR OLDER	FATALITIES WHERE THE CORONER RECORDS NOTED A POTENTIAL ACCESS OR FUNCTIONAL NEED*
<i>Butte</i>	85 [†]	67	13
<i>Sonoma</i>	24	18	7
<i>Ventura</i>	5	3	0

Source: Analysis of death investigation reports and autopsy records the Sonoma County Sheriff Coroner’s Office, the Ventura County Medical Examiner’s Office, and the Butte County Sheriff Coroner’s Office provided for individuals who died as a result of natural disasters.

Note: At Butte and Sonoma, all of the fatalities occurred as a result of the Camp and Sonoma Complex Fires. In Ventura, the fatalities occurred as a result of the Thomas Fire and the 2018 Woolsey Fire.

* Our ability to determine the number of fatalities with access and functional needs was limited by what was stated in the reports provided by each county. As such, we have no way to determine whether these numbers represent the total number of fatalities of people with access and functional needs.

† As of October 2019, one of the fatalities in Butte County remained unidentified. Although we included that person in the total fatalities, we were unable to determine the decedent’s age or possible access and functional needs.

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Chapter 1

THREE COUNTIES ARE NOT ADEQUATELY PREPARED TO PROTECT THEIR MOST VULNERABLE RESIDENTS DURING NATURAL DISASTERS

Butte, Sonoma, and Ventura are not as prepared as they could be to protect their residents during future natural disasters because they have not followed key practices for emergency planning. FEMA and other emergency management authorities have published best practices for effectively planning for natural disasters, including how to assist people with access and functional needs. However, none of the three counties we reviewed fully followed these practices before recent wildfires: the Camp Fire in Butte, the Sonoma Complex Fires in Sonoma, and the Thomas Fire in Ventura. As a result, they lacked up-to-date and complete plans for the key emergency functions of alerting, evacuating, and sheltering their residents. In the absence of such plans, the counties were underprepared to issue effective alerts and warnings, and they struggled to promptly obtain the resources necessary to evacuate and shelter individuals with access and functional needs during recent wildfires. Given the weaknesses we identified in the three counties' plans and the struggles local jurisdictions have had in assisting people with these needs, the State must take a more active role in ensuring that local jurisdictions maintain effective plans for responding to natural disasters.

The Three Counties Have Not Followed Key Emergency Planning Practices

Despite available guidance and the potentially devastating effects of being underprepared for a disaster, the three counties we reviewed have not followed key practices of emergency planning. California's Emergency Services Act does not require local jurisdictions to develop emergency plans, but FEMA states that leaders in jurisdictions are responsible for taking necessary and appropriate actions to protect people from threats and hazards, which would include natural disasters. FEMA, the American Red Cross (Red Cross), Cal OES, and other entities listed in the text box have published guidance that they advise emergency management agencies to follow so that the agencies develop the best possible emergency plans. Included in this guidance is FEMA's comprehensive guide to emergency planning, which FEMA states is the foundation for emergency planning in the United States and contains the fundamentals of planning

Selected Sources of Best Practices for Planning for People With Access and Functional Needs

Federal:

- FEMA
- American Red Cross
- National Council on Disability
- U.S. Department of Justice

State:

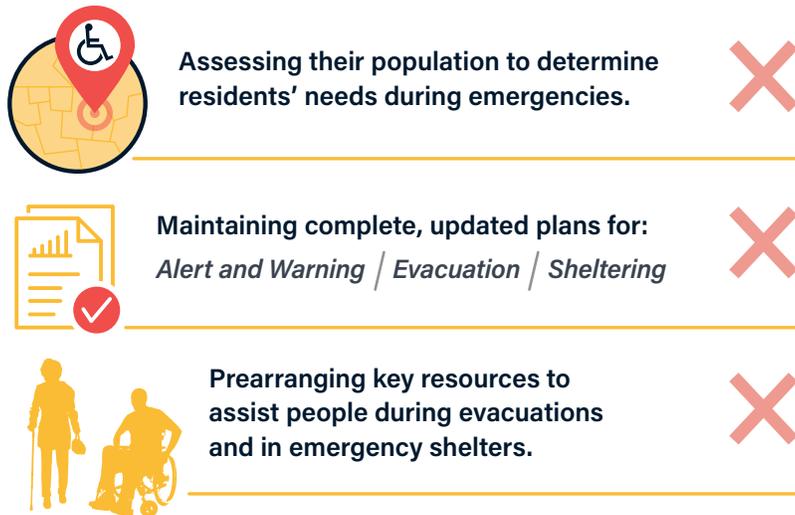
- Cal OES
- California Department of Transportation
- California State Independent Living Council

Source: Publicly available best practices.

and developing emergency plans. Among these practices are having specific plans for critical emergency functions and ensuring that those plans address the needs of the whole community that an agency serves. FEMA and Cal OES have also published guidance that advises emergency planners to prearrange for important resources, such as transportation and shelter supplies. However, the three counties did not fully implement these important practices before the recent wildfires we reviewed, and as Figure 4 shows, the counties still have not done so. As a result, these counties are less prepared for future natural disasters, which may place their residents at greater risk of harm.

Figure 4
The Three Counties Are Not Adequately Prepared for Natural Disasters

The counties **have not** followed key planning practices...



Source: Emergency planning documentation at Butte, Sonoma, and Ventura, and FEMA guidance.

None of the Counties Have Up-to-Date Plans for Key Emergency Functions

Under the state plan, local governments should have one main plan called an *emergency operations plan* that assigns responsibility to the appropriate departments within the local government for providing support to people during an emergency. For example, a county may assign responsibility for issuing alert and warning messages to its sheriff's department and assign responsibility for managing emergency shelters to its social services department. As part of the emergency operations plan, counties can develop *functional annexes*, which are appended to the emergency operations plan and focus on critical operational functions,

including how the jurisdiction implements those functions before, during, and after an emergency.¹ However, at the time of the wildfires we reviewed, the three counties we visited either lacked or had outdated plans for the critical emergency functions of communicating alert and warning messages, evacuating residents, and sheltering evacuees.²

Despite having emergency operations plans, before their recent wildfires, Sonoma and Ventura lacked plans for issuing alerts and warnings and evacuating residents. Ventura also lacked a sheltering plan and Sonoma had only a draft sheltering plan; since the Thomas Fire and Sonoma Complex Fires, neither county has completed any of these plans. As we discuss in more detail throughout this chapter, Sonoma has—in response to the wildfire—taken recent steps toward creating plans or guidance in these key areas of emergency response; however, it has not yet finalized any of its work. Ventura has developed draft plans for alert and warning and sheltering, but for reasons we describe in more detail later, it does not believe it needs a full evacuation plan.

During our review, Ventura stated that a separate plan it developed in May 2016 specifically for addressing access and functional needs (access and functional needs plan) was evidence that it had adequately planned to meet these needs. However, this plan is problematic for several reasons. First, the county has not implemented key portions of the plan, including steps that are advised in FEMA or Cal OES's best practices. For example, FEMA states that local jurisdictions should have plans for alert and warning, evacuation, and sheltering, and that each should include strategies for how the county will assist people with access and functional needs. Although Ventura's access and functional needs plan indicates that Ventura will more fully address how it will meet these needs in separate plans for alert and warning, evacuation, and sheltering—Ventura had not finalized any such plans as of early October 2019. Also, the plan states that Ventura will work to ensure that alert and warning messages are accessible to residents who do not speak English. As we describe later in this chapter, Ventura did not issue alert and warning messages at the beginning of the Thomas Fire in any languages other than English. Finally, having a separate plan for people with access and functional needs is not aligned with Cal OES's guidance. The guidance that Cal OES provides as part of its training on planning to meet access and functional needs

Despite having emergency operations plans, before their recent wildfires, Sonoma and Ventura lacked plans for issuing alerts and warnings and evacuating residents.

¹ Throughout our report, we use the term *plan* when referring to both the counties' emergency operations plan and their functional annexes.

² Butte provided an updated alert and warning plan after we sent a draft copy of our report to Butte for its final comment. Butte provided no evidence that the plan had been approved or finalized. We look forward to reviewing the extent to which the plan incorporates best practices and addresses access and functional needs as part of our 60-day follow-up to this report.

Butte had plans for alert and warning, evacuation, and sheltering at the time of the Camp Fire. However, it completed those plans and its emergency operations plan in February 2011, which makes them significantly outdated.

states that although plans for specific emergency functions are part of standard emergency planning practices, access and functional needs integration should occur throughout a plan instead of being addressed in a stand-alone document. Cal OES specifically told Ventura that having a stand-alone plan was not advisable when it reviewed Ventura's emergency plans in 2016. During that review, Cal OES recommended that Ventura ensure that all of the information in its access and functional needs plan was distributed throughout its emergency operations plan, which it has not done.

Unlike Sonoma and Ventura, Butte had plans for alert and warning, evacuation, and sheltering at the time of the Camp Fire. However, it completed those plans and its emergency operations plan in February 2011, which makes them significantly outdated. FEMA guidance states that maintaining updated plans is critical to the continued utility of those plans and that local jurisdictions should review and update their plans at least every two years. It further states that outdated plans can cause setbacks for local jurisdictions because of old information, ineffective procedures, incorrect role assignments, and outdated laws. Further, state law requires Cal OES to update the state plan every five years, so we would expect that counties would update their plans with at least similar frequency. Weaknesses in Butte's emergency plans support FEMA's observations about potential problems with outdated plans. Some of the response strategies that the plans describe are not reflective of more recent changes to Butte's actual response processes. For example, its alert and warning plan does not discuss Butte's addition of a major federal alert and warning system, the Integrated Public Alert and Warning System, to its repertoire of alert and warning strategies. As a result, the plan does not articulate how the county will use that system during an emergency, which increases the risk that the county will not use it effectively.

In May 2019, Butte convened its public alert and warning working group. According to the sheriff's office liaison (sheriff's liaison) for emergency planning, it created this group to update its 2011 alert and warning plan. Butte provided us with a draft version of this plan in September 2019. The draft includes updated considerations for Butte's alerting methods, including how it plans to use the Integrated Public Alert and Warning System. The sheriff's liaison explained that it updated this plan for several reasons, including recent changes to state law that make its receipt of emergency response funding contingent on having an updated and current alert and warning plan, as well as the county's desire to improve coordination of emergency notifications with neighboring jurisdictions, and to identify the delivery methods of emergency notifications. However, as of early October 2019, this plan remained in draft form, and Butte's plans for evacuation and sheltering were still the versions from February 2011.

According to the county administrative officer at Butte, there are a variety of reasons why it has not updated these key emergency plans. For one, the Great Recession and the recent multiyear drought caused an extended period of limited resources in the county. In addition, county resources have been devoted to responding to and recovering from an increased number of natural disasters, including the 2018 Camp Fire, which we acknowledge is an effort to recover from the most destructive and deadliest wildfire in the history of the State. Nonetheless, it is critically important for Butte to update its plans given the benefits that updated emergency plans could provide to the county, and given that in a hazard threat assessment it released to the public in September 2019, Butte predicted that the county is highly likely to experience a variety of natural disasters in the future.

Advance planning is critical to a local jurisdiction's ability to effectively respond to emergencies because—among other benefits—the plans can clarify responsibilities, identify how to respond in multiple scenarios, and improve the ability to effectively manage response operations in the face of the complexity and uncertainty inherent in natural disasters. According to FEMA, emergencies often evolve rapidly and become too complex for effective improvisation. We recognize—as FEMA states—that using a prescribed planning process cannot guarantee success. However, FEMA has also observed that inadequate plans and insufficient planning are proven contributors to failure. Therefore, to the extent they do not follow key planning practices—such as having up-to-date, key emergency plans—these three counties' abilities to effectively respond to natural disasters are likely to be impaired.

The Counties Have Not Adequately Assessed Their Communities to Determine Needs

In addition to missing or outdated plans, before the wildfires the three counties had not adequately tailored their existing emergency plans to the needs of their communities, nor have they done so in the draft plans that they have developed since the fires. FEMA states that the demographics of a population, including its resources and needs, have a profound effect on emergency response functions, such as evacuation and sheltering. It recommends that local jurisdictions conduct demographic assessments of their communities to understand the needs that the people in their communities will have during an emergency. Local jurisdictions can then use this information to help ensure that they can meet those needs. FEMA also warns that failing to base emergency planning on the demographics and requirements of a particular community may lead to false planning assumptions, ineffective courses of action,

FEMA states that the demographics of a population, including its resources and needs, have a profound effect on emergency response functions, such as evacuation and sheltering.

Emergency managers should use information compiled from multiple relevant sources—including social service listings and housing programs, among others—when developing an understanding of the number of individuals who have access and functional needs.

and inaccurate resource calculations. Despite this guidance, none of the three counties we reviewed has completed an assessment of its population and that population's needs.

According to FEMA guidance, emergency managers should use information compiled from multiple relevant sources—including social service listings and housing programs, among others—when developing an understanding of the number of individuals who have access and functional needs in their community. Using multiple sources enables emergency management agencies to obtain a more precise understanding of the magnitude of the need in their community and of the geographic location or concentration of those needs. Emergency managers can then make more informed decisions about the level of resources they may require during emergencies. General, county-level census data cannot provide this level of specificity.

Ventura's emergency plans do not include any demographic information. The staff emergency manager explained that the county does not conduct demographic assessments before a disaster because it does not have a good source of data, due to individuals moving or passing away. He explained that his department recently developed an interactive map of licensed skilled nursing facilities and group homes, which it can use before and during an incident. Although these data could be helpful during the planning process, they do not capture the full scope of Ventura's vulnerable community. As we discuss in the Introduction, state law includes in its definition of *access and functional needs* individuals who are homeless, who have transportation disadvantages, or who have limited English proficiency. Therefore, we expected Ventura to have conducted a more complete demographic assessment that includes these individuals to inform its emergency planning.

Butte's and Sonoma's emergency plans contain some demographic information about their populations but lack the more informed estimates called for by best practices. For example, Sonoma's emergency operations plan lists only general census data for the county and Butte's 2015 plan for extreme cold and its 2018 plan for extreme heat indicate that the county has two main populations of individuals who may not understand English. Further, Butte has another emergency plan that its Public Health Department developed in 2015 that contains demographic data from the census and information about the number of skilled nursing and assisted living facilities, among other statistics. Similar to Ventura, this information could be helpful to emergency planning, but it is not representative of the full range of access and functional needs. Also, this information does not appear to have informed Butte's key plans for alert and warning, evacuation, and sheltering as those

plans were developed before Butte compiled the demographic information found in its extreme temperature and public health plans.

No County We Reviewed Has Fully Assessed and Prearranged to Obtain the Resources It Would Need in a Disaster

A final, important planning practice that the three counties did not fully address before the wildfires—and still have not fully addressed—is ensuring the availability of critical resources during natural disasters. When a natural disaster occurs, local jurisdictions must obtain a variety of resources to support important emergency response functions, including evacuating and sheltering people. Examples of these resources include accessible transportation and medical supplies for shelters. FEMA guidance states that during the planning process, local jurisdictions should conduct assessments of the resources that they will need during disasters and identify how they will obtain those resources; for example, by developing memoranda of understanding. The state plan says that public-private partnership agreements can provide for quick access to emergency supplies and essential services. However, as we describe in this chapter, none of the counties have prearranged transportation agreements for providing evacuation assistance. Although Butte has prearranged for many emergency shelter supplies, neither Sonoma nor Ventura have made arrangements to obtain key resources for sheltering, such as accessible cots.

None of the counties have prearranged transportation agreements for providing evacuation assistance.

The Three Counties Varied in Their Views on Implementing These Planning Practices

The counties differed in their perspectives regarding adherence to these key planning practices. According to Butte’s county administrative officer, Butte cannot take on additional planning responsibilities without financial and technical assistance from the State. Ventura was agreeable to implementing some, but not all, of the best practices. For example, the staff emergency manager agreed that Ventura should create a more standardized approach in developing its emergency plans, including engaging with representatives of access and functional needs when developing the plans. However, he did not agree with the practice of developing an all-hazards evacuation plan. Rather, he believed that Ventura’s current approach to managing evacuations has been effective.

Following the Sonoma Complex Fires, Sonoma developed and approved a plan it calls its *recovery and resiliency framework*. This framework describes steps that Sonoma plans to take to recover

from the wildfires and improve its preparedness for future natural disasters, as well as timelines for accomplishing these steps. Included among these steps are actions that overlap with some of the best practices that we reviewed and describe throughout this chapter. For example, the framework states that Sonoma will develop a comprehensive alert and warning program, it will identify essential services and resources necessary during a disaster and, to the extent possible, it will have contracts or memorandums of understandings in place. The plan also makes repeated references to the vulnerability of persons with access and functional needs during natural disasters and specifically states that to achieve equity, Sonoma will identify and meet the needs of these populations before, during, and after natural disasters.

Despite this commitment to improving its preparedness through best practices, Sonoma's director of emergency management expressed concern at how costly some of the practices we discuss in this report are to implement, how impractical he believes it would be to implement them, and how not all best practices are relevant to all organizations. For example, he believes that no county emergency management agency in California currently conducts the type of demographic assessments that FEMA recommends as part of the emergency planning process because of the costs associated with regularly updating such an assessment. Although he could not provide a formal estimate of the costs of implementing best practices for addressing access and functional needs, he provided a gross estimate that doing so would require at least 10 percent more spending on emergency planning and preparedness efforts. Using the fiscal year 2019–20 budget for Sonoma's department of emergency management, that equates to roughly \$360,000. The director of emergency management did not specify whether his cost estimate accounted for the actions Sonoma has already committed to completing in its recovery and resiliency framework.

It is impossible to determine whether any additional planning efforts by the counties would have changed the outcomes of the Camp Fire, Sonoma Complex Fires, and Thomas Fire, which were devastating and unprecedented.

It is impossible to determine whether any additional planning efforts by the counties would have changed the outcomes of the Camp Fire, Sonoma Complex Fires, and Thomas Fire, which were devastating and unprecedented. However, as we describe in the following sections, these counties' planning deficiencies likely hindered their response to recent wildfires, in particular related to protecting and assisting people with access and functional needs. In the remainder of this chapter, we describe our review of each county's plans in key areas that relate to protecting and assisting people with access and functional needs as well as the counties' processes during planning for ensuring that they can meet those needs. Figure 5 summarizes those areas.

Figure 5
We Reviewed Key Areas of Emergency Management at Each of the Three Counties



Source: Auditor analysis, state law, and FEMA guidance.

Despite Available Best Practices, None of the Three Counties Adequately Involved Representatives of People With Access and Functional Needs in Its Planning Process

Best practices from FEMA and Cal OES suggest that emergency management agencies should involve individuals with a variety of access and functional needs in all aspects of the planning process because those individuals understand what they will need during disasters. For similar reasons, the best practices also recommend involving local community organizations that serve these individuals. For example, organizations that provide services to people who are deaf or hard of hearing can provide information on how counties should communicate critical information, such as evacuation alerts, to such individuals during emergencies. Further, Cal OES’s guidance notes that community organizations already have established networks in the communities they serve. The text box identifies examples of actions from Cal OES guidance that counties should take to involve such community organizations in their emergency planning. As Figure 6 shows, the three counties we reviewed all have significant populations of people with access and functional needs; however, the counties did not adequately involve representatives of these people in their emergency planning efforts.

Actions Counties Should Take to Involve Community Organizations in Emergency Planning

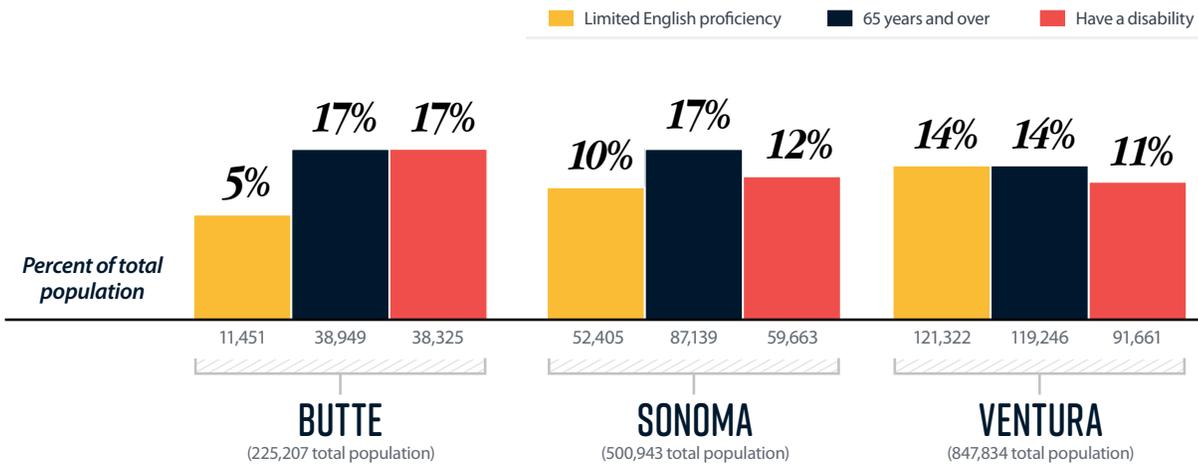
- Meet with them frequently to discuss emergency preparedness.
- Identify the resources at their disposal to aid their clients during emergencies.
- Aid them in developing emergency plans for themselves.
- Involve them in training and exercises.
- Include representatives from the organizations on committees that approve emergency plans

Source: Cal OES guidance.

Butte and Sonoma asserted that they had, to some degree, involved these representatives in the development of their emergency plans. Specifically, Butte and Sonoma generally stated that they had met with one to two organizations representing people with certain access and functional needs during the development of their emergency plans. In addition, Sonoma stated that it brought its draft emergency plan to a meeting with one of the organizations for its members to review, and Butte asserted that it included the

organizations it met with in its planning discussions. However, neither county was able to provide documentation demonstrating the level of involvement that these organizations had in the planning process. Staff at both Butte and Sonoma stated that they did not retain that documentation because their document retention policies required them to destroy it. Sonoma’s director of emergency management further stated that retaining that documentation is not an industry standard.

Figure 6
The Counties Have Significant Populations of People With Access and Functional Needs



Source: U.S. Census data for Butte, Sonoma, and Ventura.

Note: Some people may be counted more than once because they have multiple access and functional needs. For example, a person with limited English proficiency may also have a disability.

When we asked Ventura’s staff emergency manager whether Ventura had included representatives of people with access and functional needs in its emergency planning process, he indicated there were two ways in which he believed it had done so. First, he explained that Ventura’s emergency planning council, which is responsible for reviewing and adopting emergency plans, includes a representative for nongovernmental organizations, and he claimed that this individual coordinates input from a few organizations that represent specific access and functional needs populations. However, this planning council is not involved in developing the emergency plan, and the organizations that Ventura claimed are represented by this individual are not inclusive of all types of access and functional needs. The staff emergency manager also stated that the county’s plan for access and functional needs was developed in partnership with representatives of people with

those needs. This plan states that its purpose is to provide an overview of Ventura's policy with respect to emergency planning and emergency services for citizens with access and functional needs. It further states that Ventura would establish and coordinate a planning group with a diversity of access and functional needs represented and that this group would ensure that Ventura's emergency plans were inclusive. However, according to the staff emergency manager, this planning group was used solely for developing this access and functional needs plan, and the group no longer exists. Further, he is neither aware of nor does he have documentation as to who was part of this planning group because he was not responsible for organizing the group. As we describe earlier, we determined that Ventura's separate plan for addressing access and functional needs was counter to best practices, which recommend that emergency planners integrate plans for meeting access and functional needs into the overall plans rather than creating a separate plan. We also determined that Ventura has not followed through with key tasks that the plan said it would perform in advance of a disaster.

The practices that the counties described to us fall short of the best practices we identified for involving individuals with access and functional needs in planning. FEMA states that the most realistic and complete emergency plans are prepared by a diverse planning team that includes, among others, representatives of people with a variety of access and functional needs. As our Introduction describes, *access and functional needs* is a term that encompasses many needs or challenges that individuals may have. Emergency management agencies must plan to employ multiple strategies to meet these various needs and challenges during an emergency. By consulting only a few of these organizations, the counties have not obtained participation and viewpoints from the full range of people with access and functional needs in their communities. For example, none of the counties claimed to have engaged communities with limited English proficiency when developing their existing emergency plans, which would limit their ability to incorporate these communities' perspectives in their planning.

Further, when we spoke to several community organizations in each of the three counties, the majority reported that their county's emergency management agency had never consulted or involved them. Some of these organizations also reported that during the recent wildfires, they provided direct assistance to people with access and functional needs. However, the counties had apparently not taken advantage of these vital sources for critical information, thereby missing an opportunity to learn what individuals in these communities need during natural disasters and how the counties could prepare to meet those needs.

None of the counties claimed to have engaged communities with limited English proficiency when developing their existing emergency plans, which would limit their ability to incorporate these communities' perspectives in their planning.

An additional benefit of involving organizations that serve people with access and functional needs in emergency planning is that it may increase individuals' preparedness.

An additional benefit of involving organizations that serve people with access and functional needs in emergency planning is that it may increase individuals' preparedness. However, because the counties did not adequately involve these representatives, they missed an opportunity to realize this benefit. According to FEMA guidance, including community leaders in planning reinforces the expectation that community members have a shared responsibility during natural disasters and strengthens the public's motivation to conduct planning for themselves and their families. As Figure 7 indicates, people with access and functional needs can take numerous actions to prepare themselves for natural disasters. These actions can make a significant difference in ensuring their safety when a natural disaster occurs. By doing more to engage communities of people with access and functional needs in their planning processes, counties can encourage everyone's emergency preparedness.

Butte's emergency manager believed that until recent significantly sized events in 2017 and 2018, the planning process that Butte used had proven to be adequate. However, she stated that she will ensure that Butte follows best practices and communicates with representatives of people with access and functional needs when developing its emergency plans. Similarly, Ventura's staff emergency manager agreed that Ventura should engage representatives of these communities in future planning efforts. However, he also questioned whether many organizations exist in Ventura County that represent individuals with disabilities because he was not personally aware of them. As we discuss earlier, counties should involve representatives of people with a variety of access and functional needs, not just people with disabilities, in the planning process.

Sonoma's director of emergency management disagreed with our assessment of how well the county involved representatives of individuals with access and functional needs in its emergency planning process. However, he was unable to provide documentation to refute our conclusions. For example, he stated that his department sought feedback from the county's access and functional needs committee when developing its emergency plans, including its draft alert and warning plan. However, the chair of this committee—which includes representatives from various access and functional needs communities—stated that although he was aware that Sonoma was developing an alert and warning plan, the committee has not been involved in that process. Further, the chair noted that there is no formal process at Sonoma for ensuring that the committee he chairs is incorporated in the planning process. FEMA states that representatives of access and functional needs communities should be incorporated into all aspects of the planning process. In the sections that follow, we describe the counties' responses to natural disasters and how more adequate planning could have supported their response efforts.

Figure 7
People With Access and Functional Needs Can Take Steps to Prepare for Natural Disasters

Individuals can improve their ability to protect themselves during a natural disaster by taking certain steps in preparation.

This preparation can reduce fear and anxiety, minimize the impact of disasters, and reduce demands on local jurisdictions' resources.

- ✓ Sign up to receive emergency communications.
- ✓ Prepare a kit containing emergency supplies, such as food, water, a radio, and medicine.
- ✓ Make plans for how to evacuate and how to reconnect with family.

People with access and functional needs may need to take different or additional steps to prepare themselves for emergencies.

Examples:

 <p>People who are deaf can buy vibrating pagers or bed-shakers to improve their ability to receive emergency alerts.</p>	 <p>People who need assistance during a disaster should develop a personal support network of family and friends that can help them evacuate.</p>	 <p>People taking medication should include a one-week supply in their emergency kit.</p>
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Source: Best practices from FEMA, Cal OES, and the National Council on Disability.

None of the Three Counties Prepared Adequately to Warn Residents of Impending Danger From the Wildfires

When natural disasters occur and threaten people's safety, timely alert and warning messages can mean the difference between life and death. These emergency communications are directed at the public to attract their attention and, in some cases—such as evacuation warnings—persuade them to take action to protect themselves. Alert and warning messages are most effective when emergency management agencies issue them quickly and ensure that they are understandable. Any delay in people's receipt or

Methods That Governments Can Use to Alert and Warn Residents

- Voice messages
- Text messages
- Emails
- Social media
- Websites
- Teletypewriters (TTY)
- Radio
- Television
- Door-to-door notifications
- Loudspeakers through neighborhoods
- Sirens

Source: FEMA, U.S. Department of Homeland Security, and Cal OES guidance.

understanding of alert and warning messages directing them to evacuate or otherwise protect themselves can threaten their safety or even their lives. Alerting agencies can use several methods to send these important messages, as the text box shows.

Best practices for alerting and warning the public about natural disasters identify key issues that counties should consider when establishing their approaches to emergency communications. First, FEMA and Cal OES suggest that because no single method will reach all people, counties should plan to use several methods to maximize the number of people who receive an alert or warning. In addition to addressing the diverse ways people receive information, this approach can also help messages reach intended targets when a natural disaster has destroyed key infrastructure used to transmit such messages. Also, the U.S. Department of Homeland Security encourages emergency management agencies and other alerting authorities to plan for the accessibility of their messages so as to better reach populations with access and functional needs.

For example, agencies can alert people who are deaf by ensuring that messages are written because people who are deaf would be unable to hear an audio phone call or listen to a radio broadcast for emergency information.

However, despite the critical importance of alert and warning messages, the counties we reviewed did not fully adhere to best practices for planning to issue these messages. As discussed previously, none of the counties had updated alert and warning plans. FEMA guidance states that an alert and warning plan should identify and describe the actions that locals will take to initiate and disseminate the initial notification that a disaster or threat is imminent or has occurred. This guidance further states that this plan should identify and describe the actions that will be taken to alert individuals with sensory or cognitive disabilities and others with access and functional needs in the workplace, in public venues, and in their homes. As noted earlier, Butte had an alert and warning plan, but it was outdated, as it made no mention of a significant federal alert system that it had access to. Ventura had standard operating procedures that describe the use of one specific system that it uses for sending alert and warning messages. Although the staff emergency manager asserted that this set of procedures was Ventura's alert and warning plan, the procedures did not address all of the key components of Ventura's warning system. Further, procedures for operating a specific alerting system are not a sufficient replacement for a comprehensive alert and warning plan.

All three counties asserted that they used multiple methods for alerting and warning people during the wildfires we reviewed, including many of the methods listed in the earlier text box. As we previously describe, the size and scope of those wildfires were devastating and unprecedented. We recognize that even if the counties had implemented all best practices related to issuing alert and warning messages, it is unlikely that they would have alerted every single person within their evacuation zones because of infrastructure challenges and the limitations of any given alerting method. However, as noted above, employing the best practices can help counties to maximize the number of people who receive critical alert and warning messages. By not implementing these best practices in their planning, the counties impaired their abilities to effectively warn residents of the impending dangers from the wildfires we reviewed, as Figure 8 shows.

Butte and Sonoma Did Not Send Messages That Could Reach All Residents With Cell Phones

In response to the recent wildfires, neither Butte nor Sonoma alerted their residents using a system designed to send warning messages to all cell phones in the evacuation area. FEMA built a system that allows emergency management agencies and other alerting authorities to issue alert and warning messages called Wireless Emergency Alerts (WEA messages). As the text box describes, using the federal system to send WEA messages provides distinct advantages over the use of opt-in emergency alert systems and landline contact information. These advantages give WEA messages the capacity to alert a significantly greater number of people in an evacuation zone, including people with access and functional needs. During the Thomas Fire, Ventura issued WEA messages to notify people about the threat and direct them to more disaster information.

However, neither Butte nor Sonoma issued WEA messages during the Camp and Sonoma Complex Fires, respectively. Instead, these two counties issued emergency messages through their local emergency alert and warning systems. According to the counties, their systems use contact information, such as cell phone numbers, that residents provide, as well as landline contact information that the counties purchase from service providers. However, using only these opt-in systems is inherently problematic given the public's declining use of landlines and the small percentage of people who sign up for cell phone alerts. For example, in the aftermath of the Sonoma Complex Fires, the number of phone numbers registered to receive alerts and warnings through

Benefits of Using a WEA Instead of Opt-In Emergency Notification Systems

WEA

- Can reach all cell phones in an area.
- Generates unique alert tones and vibration pattern.
- Not affected by cellular network congestion.

Opt-In Systems and Landline Contact Information

- Reaches only landlines and cell phones that owners have preregistered to receive alerts.
- Looks and sounds like a regular text message or phone call.
- Disrupted by cellular network congestion.

Source: U.S. Department of Homeland Security, FEMA, and Cal OES guidance regarding alert and warning systems.

Sonoma’s opt-in system represented fewer than 60 percent of the residents of the county. Consequently, even if every resident who had registered received the evacuation warnings that Sonoma sent, a significant percentage of the county’s residents still did not receive these critical notifications. Moreover, Sonoma’s records show that about 60 percent of the phone calls it made failed to connect, and for Butte, the failure rate was about 50 percent, meaning that many people in the evacuation zones did not receive these critical messages. Although the two counties also used some other methods to alert people during the wildfires, such as email and—in the case of Butte—social media, none of these methods have the ability to reach as many people as quickly as WEA messages.

Figure 8
None of the Counties Adequately Warned Residents of Impending Danger From Wildfire



Source: Alert and warning records at Butte, Sonoma, and Ventura.

The fact that neither Butte nor Sonoma issued alerts and warnings through WEA messages during recent emergencies appears related to deficiencies in their preplanning for a natural disaster. Butte asserted that it attempted to issue a WEA message in the immediate hours after the Camp Fire began but that the messages failed to send through the software program it uses. FEMA guidance on WEA indicates that counties should test their software to ensure that it is functional before using it in a natural disaster. However, staff at Butte acknowledged that they had never tested Butte's software before the Camp Fire. Although testing does not guarantee that problems will not happen during a natural disaster, it is a reasonable step that Butte should have taken. Although Butte still has not finalized plans for issuing WEA messages, it has issued WEA messages to warn residents about potential flooding and to issue evacuation notices since the Camp Fire.

According to Sonoma's director of emergency management, who was not in his position during the Sonoma Complex Fires, the county did not issue a WEA message during the fires because the county—under the leadership of the previous emergency manager—planned in advance not to do so. According to Cal OES's post-event review, emergency management in Sonoma believed that the WEA system had limitations, including that it would send messages to those who were not in the intended evacuation zone. Cal OES concluded that staff largely based their decision not to issue a WEA message on their experience, previous policy discussions, and perceived knowledge of the situation; however, they were also influenced both by their limited understanding of the WEA system, referencing Sonoma staff's belief that issuing a WEA message would cause traffic congestion, and by outdated information regarding its capabilities. According to Sonoma's current director of emergency management, at the time of the Sonoma Complex Fires, there was national discussion regarding local governments' concern about using the WEA system for various reasons. He provided a July 2017 letter that Harris County, Texas, submitted to the Federal Communications Commission wherein it shared concerns about the WEA system, including a concern regarding the system's inability to more accurately target areas for alerts. In September 2018, Sonoma conducted a test of the WEA system. In a report summarizing the results of the test, Sonoma noted that the test findings indicated that significant challenges remained regarding the effective use of the WEA system, including incomplete and inconsistent alerting across telecommunication providers, significant bleed-over when targeting specific geographic locations, and the performance of the technology across various wireless devices. The report noted that local emergency managers would have to take these shortcomings into account when developing alert and warning efforts. However, since the fires, Sonoma has created a draft alert and warning

The fact that neither Butte nor Sonoma issued alerts and warnings through WEA messages during recent emergencies appears related to deficiencies in their preplanning for a natural disaster.

plan that includes plans to issue WEA messages during future disasters. Additionally, Sonoma has since issued WEA messages during more recent emergencies, which suggests that Sonoma recognizes additional benefits to issuing a WEA message despite the limitations it believes the system has.

The Content of Butte's and Sonoma's Alert and Warning Messages Did Not Align With Best Practices

In addition to not sending warnings using the WEA system, Butte and Sonoma did not ensure that the content of their alert and warning messages aligned with best practices. FEMA advises that plans for alert and warning should include pre-scripted messages for specific hazards. According to FEMA, effective warning messages should contain certain key elements, including the source of the warning, the specific hazard and its location, and the protective action that the public should take. However, Butte and Sonoma did not always include all of these elements in the messages that they sent through their opt-in and landline systems. For example, as the example messages in Figure 9 demonstrate, Butte never identified the entity sending its evacuation warnings during the Camp Fire. FEMA advises that warnings should come from sources with credibility, and the National Council on Disability states that the response individuals have to an emergency alert depends in part on the level of trust they have in the source. Therefore, Butte's content in its warning messages made it less likely that recipients would perceive a warning as credible, and they would be less likely to act on it.

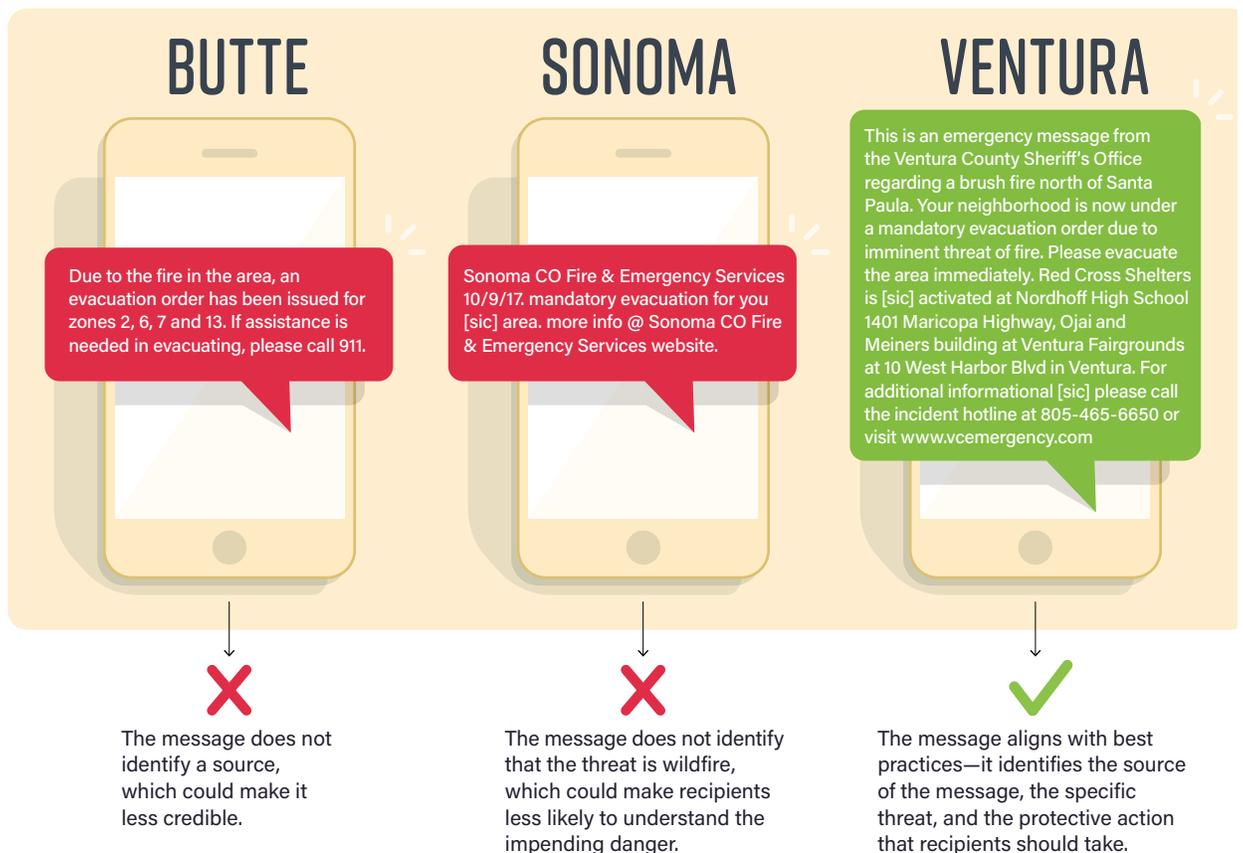
According to the sheriff's liaison, the messages did not comply with best practices because Butte's emergency staff was rushed. However, he acknowledged that developing message templates in advance would be beneficial in ensuring that alert and warning messages incorporate key elements, and Butte finalized those templates in October 2019. The templates include the source of the warning messages.

The alert and warning messages that Sonoma issued during the Sonoma Complex Fires contained the key elements identified in best practices more often than those that Butte issued. Unlike Butte's evacuation warnings, Sonoma almost always included the source of the warnings. However, its messages did not consistently identify the specific hazard. Instead, the county sometimes told recipients to evacuate without telling them that a fire was approaching. By not identifying the specific hazard, Sonoma risked that recipients of those warnings would not understand the severity of the impending danger. When we asked Sonoma's director of emergency management why its messages did not consistently

Effective warning messages should include certain key elements, including the source of the warning, the specific hazard and its location, and the protective action that the public should take.

identify the hazard residents faced, he said he could not speculate on the reason because he was not the director of emergency management at the time of those fires. Sonoma has since developed pre-scripted messages for use during natural disasters, and they guide the staff sending the alert to include the nature of the threat.

Figure 9
The Messages That Butte and Sonoma Issued During the Recent Fires Did Not Align With Best Practices for Ensuring That They Were Effective



Source: Analysis of FEMA best practices and emergency alert and warning records from Butte, Sonoma, and Ventura.

Among the three counties, the alert and warning messages that Ventura sent most consistently aligned with best practices. Those messages almost always contained the source of the message, a description of the hazard, and the protective action that recipients should take. Ventura's preparation for natural disasters seems to explain the significantly better messages it sent during its wildfire. Unlike Butte and Sonoma, Ventura had followed the best practice

FEMA guidance states that communities with high percentages of non-English-speaking residents should consider issuing warnings in multiple languages and using pretranslated templates to minimize the amount of information that would require translation for actual alerts.

of developing message templates in advance, which expedited its ability to issue alert and warning messages and to ensure that such messages contained each of the key elements.

None of the Three Counties Sent Crucial Messages in Languages Other Than English

Finally, despite their having significant populations of residents with limited English proficiency, all three counties issued messages directing people to evacuate in English only. As a result, some people likely did not receive potentially lifesaving emergency information in a language that they could understand. FEMA guidance states that communities with high percentages of non-English-speaking residents should consider issuing warnings in multiple languages. FEMA further recommends using pretranslated templates—similar to the pre-scripted English templates we mention above—to minimize the amount of information that would require translation for actual alerts. A local community organization in Ventura told us that during the Thomas Fire, parents with limited English proficiency had to rely on their children for help translating emergency messages. According to this community organization, relying on children to translate made it difficult for individuals to assess the danger of their situations. After that community organization complained to the county about the lack of translated information, Ventura began translating information into Spanish. However, it did not issue its first messages in Spanish until 10 days into the wildfire—too late for those who needed to evacuate before that time. Ventura stated that the need for it to issue alerts in Spanish is evident in hindsight and that it had never previously received feedback that it needed to issue emergency alerts in other languages. During subsequent natural disasters, Ventura has issued alert and warning messages in Spanish and maintains a set of pre-scripted Spanish messages.

Butte and Sonoma offered their own explanations for why they issued evacuation messages only in English. In Butte, the sheriff's liaison stated that staff members did not issue messages in languages other than English because they were rushed. He acknowledged that having prepared scripts for the translated messages would be beneficial. In October 2019, Butte completed templates in both Spanish and Hmong, the two primary non-English languages in Butte County. Sonoma asserted that it did not issue messages in languages other than English because when the Sonoma Complex Fires began, the emergency coordinator responsible for issuing messages was out of town and issued evacuation warnings remotely without access to translation services or translated messages. However, we question this explanation because Sonoma never issued any alert and warning messages in any language other than English

during the duration of the fire. When counties do not provide translated evacuation warnings, residents who do not speak English may unknowingly remain in unsafe locations or may have to find others to translate the messages for them, delaying their ability to safely evacuate. Since the Sonoma Complex Fires, Sonoma has issued emergency alerts in Spanish.

The Unprecedented Wildfires Challenged the Three Counties' Abilities to Provide Evacuation Assistance

As we discuss in the Introduction, the recent wildfires in the three counties we reviewed were devastating and unprecedented. During these fires, there were significant acts of heroism by firefighters, law enforcement officers, and civilians while fighting the fires and while evacuating residents. The actions of these first responders and others saved lives and prevented each of the fires from being even more deadly and destructive than they ultimately were.

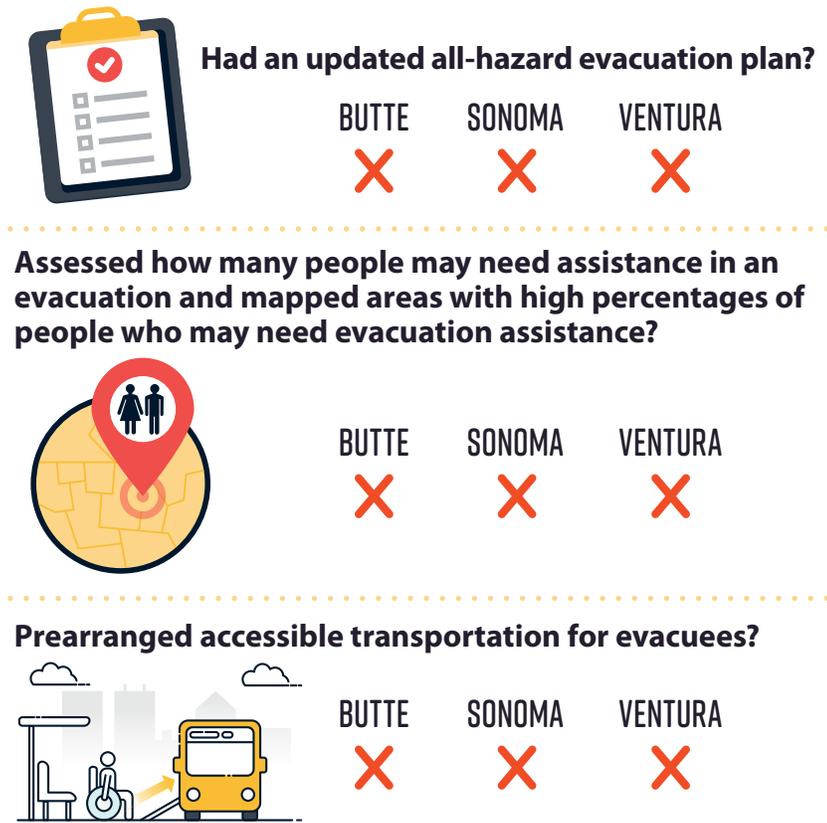
However, first responders in each county also reported to us challenges in obtaining sufficient resources to quickly provide evacuation assistance to some of the people who may have needed such help. During natural disasters, people with disabilities may not be able to evacuate without accessible transportation, such as wheelchair-accessible buses, and first responders in each of the counties told us that accessible transportation options were limited during the responses to those fires. The first responder in Ventura, who is a sergeant in the sheriff's department's tactical response team, stated that such resources were not needed during the Thomas Fire, but had they been needed, it would have been challenging to provide them given the limited resources available at the time. Additionally, we spoke to community organizations that represent or provide services to people with access and functional needs in each county. Some of these organizations in Butte and Sonoma stated that the resources to support evacuating the clients they serve were overwhelmed by the disasters.

We recognize that no amount of planning or preparation will guarantee that a county is fully prepared for a natural disaster. This is particularly true in cases like those we reviewed, in which the natural disasters were historic in size and scope. Moreover, determining whether any additional lives would have been saved during these events if the counties had planned differently or more fully implemented the best practices that we discuss in this report is impossible, and we reach no conclusions to that effect. Further, FEMA acknowledges that using a prescribed planning process cannot guarantee success, although it also notes that inadequate plans and insufficient planning are proven contributors to failure.

First responders in each of the counties told us that accessible transportation options, such as wheelchair-accessible buses, were limited during the responses to the recent wildfires.

Before the recent fires, the three counties did not implement critical best practices to ensure that they were as prepared as possible for evacuating individuals during natural disasters, as Figure 10 shows.

Figure 10
None of the Three Counties Adequately Planned to Assist Evacuees During Natural Disasters



Source: Evacuation plans and planning documentation at Butte, Sonoma, and Ventura.

The Three Counties Either Lacked or Had Outdated All-Hazard Evacuation Plans

Two of the three counties—Sonoma and Ventura—had not adopted evacuation plans applicable to all types of potential disasters in their areas. FEMA best practices suggest that counties should develop all-hazard evacuation plans that broadly apply to a wide range of emergencies, including different types of natural disasters. FEMA guidance describes several elements that should

be included in these plans, such as traffic control measures, the local jurisdiction's provisions for evacuating individuals with access and functional needs, and processes for tracking children, especially unaccompanied minors. As Figure 10 shows, none of these three counties had updated all-hazard evacuation plans. Butte did have an all-hazard evacuation plan, but it was more than seven years old at the time of the Camp Fire. Further, although Butte's plan states that it is designed to be used for all potential hazards, it is not aligned with all-hazards evacuation planning best practices and does not address how Butte plans to support residents with access and functional needs during an evacuation. Sonoma and Ventura each have hazard-specific plans for tsunamis and flooding, but—in addition to not considering all hazards—these plans also lack strategies for how the counties plan to address residents' access and functional needs during evacuations.

Sonoma's director of emergency management stated that the county is in the process of developing additional evacuation plans; however, he could not explain why Sonoma did not have an all-hazard evacuation plan before the Sonoma Complex Fires because he was not in his position at that time. Nonetheless, he indicated that the county's current strategy for developing such a plan includes adopting specific plans for communities with evacuation challenges. Since the Sonoma Complex Fires, Sonoma has developed a framework for recovery and resiliency that states that it plans to work with community and neighborhood liaisons to identify hazards, risks, and mitigation strategies, including evacuation routes.

Conversely, Ventura's staff emergency manager stated that Ventura does not intend to develop an all-hazard evacuation plan because he believes its current dynamic, real-time approach has not hindered its ability to respond to emergencies. However, if an emergency management agency assumes it will be able to respond effectively to all future natural disasters because its previous response efforts were successful, it may not be prepared for events that are larger and more complicated than those it has faced in the past. As an example, Sonoma's after-action report for the Sonoma Complex Fires noted that the county had experienced a large number of natural disasters before the 2017 fires and that much of Sonoma's preparedness efforts had been designed to be prepared for disasters of similar size. Sonoma's report concluded that these past experiences were insufficient in preparing the county for the 2017 fires. Therefore, Ventura should not evaluate its need for changes to its emergency preparedness based solely on the disasters it has already experienced. Rather, it should strive to be as prepared as possible to provide evacuation assistance to those with access and functional needs during a natural disaster.

Since the Sonoma Complex Fires, Sonoma has developed a framework for recovery and resiliency that states that it plans to work with community and neighborhood liaisons to identify hazards, risks, and mitigation strategies, including evacuation routes.

The Three Counties Had Not Made Arrangements to Improve Their Ability to Provide Evacuation Assistance to All Who Needed It

FEMA and Cal OES guidance both recommend that emergency management agencies prearrange resources for evacuation assistance to help ensure that those resources are available during natural disasters. Cal OES specifically developed a sample agreement for transportation resources. The sample agreement guides local jurisdictions to define important considerations in these agreements, such as who has the authority to activate the agreement, the time frame within which the transportation authority should be able to respond to requests for assistance, and estimates of how many resources the transportation provider can provide. However, none of the three counties had made such prearrangements before the recent fires. Ventura asserted that it had master agreements that would allow it to leverage accessible transportation resources for evacuation assistance for residents during an emergency. However, these agreements often specified that the transportation vendors would furnish bus tokens or passes, and none of them referenced how Ventura might use these agreements during an emergency. Further, even as of the time of this audit, none of the three counties had bolstered their available evacuation resources by establishing prior agreements with transportation entities to provide evacuation assistance during natural disasters. Rather, each has planned that its emergency operations center will locate and request transportation assistance during the emergency, which requires additional time that preplanning these arrangements could reduce.

Best practices recommend that counties include public transit and transportation agencies in their emergency planning efforts.

Best practices recommend that counties include public transit and transportation agencies in their emergency planning efforts. To this end, the California Department of Transportation has published guidance for public transit operators on how to assist local jurisdictions in evacuations during natural disasters, and it recommends that representatives of local transit operators be a part of emergency planning teams and memorialize in writing their agreements with emergency management agencies. First responders in Sonoma and Ventura agreed that having arrangements in place before a disaster strikes would benefit their evacuation efforts. However, the county administrative officer for Butte disputed the necessity of such agreements, stating that Butte's regional transit authority provides resources upon request by emergency management or the sheriff's office, and claiming that because of limited resources locally, Butte depends on the State's mutual aid system for large events. Despite these assertions, because Butte has not conducted demographic assessments to determine how many people within the county may need evacuation assistance during a natural disaster, it cannot know whether the resources that the regional transit authority has available will be sufficient for all who

need assistance. Further, as we indicate earlier, agreements with transit authorities provide other benefits, such as clearly defining who is allowed to activate the agreement. Waiting until a disaster occurs to arrange for that assistance means local jurisdictions risk having difficulty locating and coordinating sufficient evacuation resources, such as local transit operators and accessible vehicles. These difficulties may unnecessarily delay potentially life-saving assistance.

The Three Counties Had Not Fully Assessed How Many People May Need Evacuation Assistance

Finally, the three counties did not leverage all available information to identify the people in their communities who might need evacuation assistance and to address those people's needs in their evacuation plans. As we describe earlier, none of the three counties had followed the emergency planning best practice of conducting demographic assessments of its population. In particular, the counties did not use existing data—available through a variety of public programs—to identify the number and concentrations of people with access and functional needs in their communities or in developing their emergency plans.

For example, each of the counties has an agency that provides in-home supportive services (IHSS) to aged and disabled people. These agencies maintain lists of people who receive IHSS and who will require assistance during an evacuation. The managers of the three IHSS agencies stated that when the counties declare local emergencies, county staff members attempt to call people on the lists to determine whether they need evacuation assistance and then the staff members notify law enforcement if so. Although these calls can help a county facilitate evacuation assistance to some people, they are limited to those receiving IHSS. Butte also enables residents with access and functional needs who do not receive IHSS to provide their contact information to the county and indicate that they will need evacuation assistance. Butte stated that it also makes calls to these individuals during a natural disaster. According to a program manager in Butte's department of employment and social services, Butte informs the public about the option to provide their contact information through its website, during social workers' home visits, and during public outreach events.

However, despite the value of IHSS information for planning purposes, neither Butte nor Ventura used this information when creating their emergency plans. Instead, each asserted that it makes use of data on people with certain access and functional needs once a disaster occurs, which deprives emergency responders of the benefits of having this information available beforehand. Further,

Each of the counties has an agency that provides IHSS to aged and disabled people. These agencies maintain lists of people who receive IHSS and who will require assistance during an evacuation.

County agencies could provide general information to emergency planners about IHSS clients—such as the neighborhoods that have high concentrations of people who need assistance—without violating state law’s restrictions on information sharing.

emergency managers at Butte and Ventura asserted that emergency planners cannot obtain IHSS lists before a disaster occurs because the lists contain health-related information that is protected by federal and state law. Ventura’s chief deputy director of human services explained that the county asks its IHSS clients to sign waivers to allow her agency to notify law enforcement about their location before the county issues a local emergency order. However, she said that based on the county’s understanding of state law, she is not permitted to offer information about the location of IHSS clients to first responders until a threat has become impending and urgent.

We are concerned that by not sharing this information before disasters occur, the two counties are missing an opportunity to better prepare to provide evacuation assistance. We believe that county agencies could provide general information to emergency planners about IHSS clients—such as the neighborhoods that have high concentrations of people who need assistance—without violating state law’s restrictions on information sharing. By not making use of existing county data when planning for emergencies, the counties are missing an opportunity to expedite evacuation assistance when natural disasters occur.

Sonoma also did not use available data to develop all of its emergency plans in the past, but unlike Butte and Ventura, Sonoma has recently leveraged available data to inform a new plan. Its human services department has formally committed to providing its department of emergency management with a copy of its updated IHSS client list each week, which allows responders to understand the level of response an IHSS client may need in an emergency situation. Sonoma has used these data in part to develop a new plan that focuses on responding to decisions by utilities to interrupt service in an attempt to prevent wildfires. This plan relies in part on IHSS data to assess the general volume of individuals in the community who may be dependent on electricity to address medical conditions.

Such a practice shows the value of this information for emergency preparedness and planning and how not leveraging these data in other planning efforts can hinder the effectiveness of those plans. The chair of the Sonoma access and functional needs committee—who also manages the IHSS program—agreed that detailed assessments of its access and functional needs residents would help the county to be better prepared to meet a variety of needs. However, he did not know why Sonoma had not used such assessments in the development of other emergency plans.

The Three Counties Had Challenges Obtaining Certain Resources to Support People With Access and Functional Needs in Emergency Shelters

When counties conduct evacuations, they may also open emergency shelters where evacuees can stay before, during, and after a disaster. These shelters provide indoor space, food, water, and sanitation to maintain the evacuees' basic well-being until they can return home. Under the Americans with Disabilities Act, emergency programs provided by public entities, including emergency shelter programs, must be accessible to people with disabilities. As the examples in the text box show, this includes ensuring that shelters can meet the basic human needs of people with disabilities, including the ability to maneuver inside the shelter, sleep, use the restroom, and shower. Best practices suggest that shelter staff should also be able to provide first aid, medicine, and medical equipment, such as wheelchairs, canes, and oxygen tanks. People who evacuate may leave behind this equipment, but without it, they may not be able to function independently or even survive.

Key Resources for Ensuring That Shelters Are Accessible to People With Disabilities

- Accessible parking
- Pathways wide enough for wheelchairs
- Accessible beds or cots
- Accessible toilets, showers, and hand-washing stations
- Braille and navigable pathways for people who are blind
- Teletypewriters (TTY) for people who are deaf

Source: U.S. Department of Justice.

It would be unreasonable to expect that counties could meet all of the needs of every evacuee immediately upon arrival at a shelter during a natural disaster, especially during unprecedented disasters like the three recent wildfires that we reviewed, when thousands of people sought shelter. However, adherence to best practices regarding establishing and operating emergency shelters enables counties to be better positioned to quickly meet the needs of evacuees, including those with access and functional needs. Despite that benefit, the counties we reviewed did not follow key best practices—including having updated sheltering plans with strategies for meeting access and functional needs—which may have impaired their ability to promptly obtain certain resources to support people with access and functional needs in shelters during the wildfires we reviewed.

Each county retained only limited documentation of the conditions in the shelters they established during the recent natural disasters we reviewed. Therefore, our analysis was limited to what we could determine from reviewing logs of resource requests and available payment or billing records, examining the counties' after-action reports containing county staff's review of the effectiveness of the counties' emergency responses, and speaking with staff who supported the shelters during the disaster responses. Managers who oversaw the shelters in Butte and Sonoma stated that the size and scope of the wildfires created challenges in promptly

During the recent natural disasters, each county had difficulty obtaining at least one key resource necessary to make shelters fully accessible to people with disabilities.

obtaining some supplies, including accessible cots, toilets, and showers. The records and statements we reviewed indicate that each county had difficulty obtaining at least one key resource necessary to make shelters fully accessible to people with disabilities. Specifically, Butte had difficulty obtaining accessible showers for its shelters. Butte's director of employment and social services said that during the Camp Fire, she requested assistance from Cal OES in obtaining showers but believes they took several days to arrive. She stated that to compensate for the lack of showers, Butte offered to transport people with disabilities to other shelter locations so they could shower. Similarly, documentation from Sonoma indicates that it had challenges obtaining sufficient accessible showers, and documentation from Ventura shows that it struggled to obtain a sufficient number of accessible cots.

Although the counties ultimately received some of these resources, delays in obtaining them can create significant discomfort for people with access and functional needs. For example, without an accessible cot, people with disabilities may not be able to lie down independently or at all. Similarly, the lack of accessible showers can result in people with disabilities being unable to shower without assistance. Staff at each of the counties acknowledged they had problems promptly obtaining certain supplies, and they stated that they did what they could to make people in the shelters comfortable while they waited for delivery of those supplies.

The Counties Did Not Assess What Their Communities Would Need in Shelters

As we discuss earlier, best practices state that counties should conduct demographic assessments to understand what needs the people in their communities may have during an emergency. As part of those assessments, best practices indicate that in shelter planning counties should be prepared to meet access and functional needs. According to FEMA, as a general rule, about 10 to 15 percent of a population will require housing in a public shelter after an evacuation. However, it also states that the demographics of a population can have a profound effect on shelter operations. FEMA recommends that in planning for shelter capacity, counties know the demographic profiles of their communities and understand the type of assistance that their various populations may require during a disaster.

However, none of the three counties performed such demographic assessments. Emergency managers in Butte and Sonoma instead used general estimates for the percentage of evacuees who would require shelter and the percentage who would have access and functional needs. For example, Sonoma's plan stated that, historically, in most events fewer than 10 percent of evacuees seek

shelter and that between 20 and 25 percent of shelter occupants may have access and functional needs. Ventura's chief deputy director of the human services agency (chief deputy director) stated that before the Thomas fire, the county had not conducted an assessment of countywide shelter capacity. She indicated that the Red Cross was the county's local government partner and the primary organization responsible for operating sheltering facilities, including identifying and developing shelter locations. However, without a capacity assessment, the county would not be able to determine whether it had adequate shelter space for its residents during a disaster.

The counties' approaches were challenged during the recent disasters. According to the chair of Sonoma's access and functional needs committee, during the Sonoma Complex Fires, the number of people with access and functional needs in shelters exceeded the county's original estimates and overwhelmed its capabilities. Similarly, the chief deputy director at Ventura stated that the Thomas Fire demonstrated that if a large-scale disaster affects the county again, it may not be able to adequately house all residents seeking shelter within its current list of shelters. She stated that Ventura was working with cities in the county to identify the current capacity of all shelters and that the county needs to be prepared to establish shelters on its own. Similarly, Butte's director of employment and social services indicated that the size and scope of the Camp Fire created challenges in promptly procuring an adequate number of accessible cots, toilets, and showers for all those in the shelters who needed them.

The Counties Did Not Adequately Prearrange Key Resources for Shelters

After a county identifies the resources it needs to make its shelters accessible, best practices recommend that it make arrangements with private providers to have those resources promptly available during a natural disaster. However, none of the three counties had conducted sufficient assessments of their resource needs or adequately prearranged agreements for obtaining equipment and supplies to ensure the accessibility of its shelters. Specifically, neither Sonoma nor Ventura had adequate prearranged agreements in place to acquire key sheltering resources. For example, Sonoma had an agreement for obtaining bulk pharmaceuticals and accessible toilets, but according to its procurement general services manager, it did not have agreements for obtaining accessible cots, showers, or durable medical equipment. The staff emergency manager at Ventura asserted that Ventura does have provider agreements for sheltering supplies. However, we reviewed the agreements that he provided and found that Ventura did not have agreements for key sheltering supplies, including accessible

During the Sonoma Complex Fires, the number of people with access and functional needs in shelters exceeded the county's original estimates and overwhelmed its capabilities.

If an emergency management agency relies solely on one source to provide essential emergency services, it risks discovering during a crisis that that agency will not be able to provide services.

cots and showers. Ventura had an agreement for accessible toilets, but the agreement stated that it was only for scheduled events or events longer than 30 days, making it unlikely that Ventura could use the agreement during a disaster. Ventura's chief deputy director who oversees shelter operations stated that the county is working on obtaining a variety of agreements for sheltering supplies. She further stated that the county plans to conduct an equipment and supply assessment so that it can build supply portfolios to have a clear understanding of what equipment and supplies are located within the cities to increase efficiency of delivery and reduce duplicate purchases.

Staff at Sonoma and Ventura explained that during past disasters, the counties relied on the Red Cross as the primary provider to open, manage, and supply their evacuation shelters and that in the past, this approach had met the counties' needs. The Red Cross has a federal charter to provide relief across the country during natural disasters, including through the support of emergency shelters. However, FEMA's guidance on managing shelters states that local emergency managers and shelter planners—and not other entities—are responsible for ensuring that sheltering services and facilities are accessible. Further, if an emergency management agency relies solely on one source to provide essential emergency services, it risks discovering during a crisis that that agency will not be able to provide services. Because the Red Cross provides support during natural disasters throughout the nation, it may not always be able to immediately fully support local emergency shelters. For example, during the Thomas Fire in Ventura, the Red Cross was also operating shelters in response to a hurricane in Texas.

Among the three counties, Butte had prearranged the most agreements. Specifically, it had memorandums of understanding with more than 25 local health care providers to provide accessible cots, medical personnel, and equipment during emergencies, and it also had separate agreements for accessible toilets. Staff from Butte stated that these agreements allowed the county to more quickly obtain resources to accommodate people with access and functional needs following the Camp Fire. However, as of the time of our review, Butte still did not have an agreement in place to obtain accessible showers, which the county struggled to obtain in the aftermath of the fire. The director of employment and social services stated that there is a general shortage of accessible showers in the State but said that if there were a greater supply and if Butte were able to obtain such an agreement, it would have been able to procure those resources faster during a disaster event. According to the deputy director of Butte's general services department, Butte's regional transit authority was in the process of applying for a grant for a trailer with an accessible shower, which the transit authority

was going to allow the county to use; however, because of a change in management staff, the grant application was not completed and the transit authority did not go forward with the grant.

Although each of the counties has taken some steps to improve their sheltering processes, none has fully implemented best practices for sheltering. Both Sonoma and Ventura have draft sheltering plans. Additionally, Sonoma's emergency coordinator stated that Sonoma had recently obtained grant funding to establish five sheltering supply trailers, which collectively will contain equipment and supplies for hundreds of individuals with access and functional needs, such as portable accessible showers. Sonoma's access and functional needs committee has also developed a list of shelter supplies that Sonoma should maintain. Both Sonoma and Ventura trained some of their staff to assess shelter residents during emergencies to identify unmet needs and request resources to meet them. Butte's director of employment and social services said she is working on developing additional and updated agreements for shelter resources and on obtaining updated information on the accessibility of the county's shelter locations to people with disabilities. Although the counties' efforts will likely improve their ability to operate shelters, until the counties more fully implement best practices related to sheltering, their ability to most effectively meet access and functional needs in those shelters may be hampered.

The Counties Had Not Adequately Planned To Establish Local Assistance Centers

In addition to shelters, counties can establish local assistance centers following natural disasters that enable individuals and families to easily access available disaster assistance programs and services. These services may include help requesting important documents, such as birth or marriage certificates, and help obtaining nutritional assistance, housing, and other necessities. The state and federal governments offer a variety of services to those affected by natural disasters—we list examples in Appendix A. Disaster survivors can access those services at a local assistance center, which is usually a single facility where they can meet with representatives from different federal, state, and local agencies. It is important that counties establish these centers as quickly as possible following disasters so that residents can begin receiving the assistance they need. Further, Cal OES guidance indicates several steps local jurisdictions should take to ensure that people with access and functional needs are aware of and can access the services at local assistance centers.

Counties can establish local assistance centers following natural disasters that enable individuals and families to easily access available disaster assistance programs and services.

Before their recent wildfires, neither Butte nor Ventura had plans for establishing local assistance centers.

The counties' approaches to planning to operate local assistance centers varied. For example, before their recent wildfires, neither Butte nor Ventura had plans for establishing local assistance centers. Butte's director of employment and social services stated that Butte instead used Cal OES guidelines for establishing local assistance centers as its plan. In contrast, Sonoma had a plan that it called its *local assistance center handbook*, but the handbook did not contain adequate measures for ensuring that local assistance centers would be accessible to people with access and functional needs. For example, contrary to best practice, the handbook does not direct Sonoma's public information officer to notify the public about the availability of the local assistance center in languages other than English, nor does it direct the staff who establish the assistance center to consider proximity to public transportation—a consideration Cal OES advises local jurisdictions to make and which could be consequential for those who lack transportation. Despite having the handbook, the individuals tasked with opening the local assistance center did not use it because an emergency coordinator at Sonoma did not give it to them until after they had opened the center. Instead, those individuals used guidance from Cal OES to operate the local assistance center.

The planning and preparedness deficiencies at Sonoma and Ventura may have contributed to challenges that those counties faced in ensuring that sufficient resources were available to assist people with limited English proficiency at the local assistance centers they established following the recent wildfires. Ventura's human services agency supported the local assistance center, and in its after-action review of the local assistance center, it noted that bilingual ambassadors was an area that could be improved. The chief deputy director explained that this observation in the after-action report meant that its local assistance center needed more translation services for languages other than English. In a related issue, we reviewed materials that Sonoma provided to survivors who attended its local assistance center, and we found that Sonoma did not provide the materials in languages other than English, and the manager who oversaw the local assistance center confirmed that it had not done so. He also stated that when county staff recognized that the local assistance center needed translated signs, he put up handwritten signs.

Butte's approach to opening a local assistance center during the Camp Fire differed from Sonoma's and Ventura's. According to Butte's director of employment and social services, the county chose to open a disaster recovery center, in partnership with FEMA, which offers the same services and resources as a local assistance center. She explained that this meant FEMA was responsible for procuring the space for the center and providing equipment and supplies and that the county worked as a support partner.

Local assistance centers that are not fully accessible to people with access and functional needs can impede those people's ability to take advantage of available resources for helping them recover from natural disasters. Staff at all three counties acknowledged the issues we identified and stated that they will revise their plans or take other steps to prevent similar problems in the future. In late September 2019, Sonoma provided a revised local assistance handbook that contains specific direction for ensuring that the centers it establishes will be accessible to people with access and functional needs, including direction to provide multilingual local assistance center signs and translation services for people who are deaf and people who do not speak English. Additionally, in response to flooding in early 2019, Sonoma opened a local assistance center where it posted signs and provided materials in Spanish. By revising their plans for establishing local assistance centers to ensure that they are accessible to people with access and functional needs, the counties can better ensure that people with those needs can benefit from the disaster recovery services there.

The State Must Take a More Proactive Role in Ensuring That Local Jurisdictions Adequately Plan to Protect Their Communities During Natural Disasters

As we detail throughout this chapter, the counties we reviewed have significant gaps in their preparedness to protect and assist vulnerable populations in the event of natural disasters. The inadequate planning for individuals with access and functional needs that we found at Butte, Sonoma, and Ventura is consistent with our country's history of natural disasters disproportionately affecting those individuals. Further, some of the deficiencies that we found at the counties—such as not having evacuation plans or not issuing effective alert and warning messages—affect all of their residents, not just those with access and functional needs. California faces a future that experts predict will include more frequent natural disasters. At the same time, demographic changes in the State have resulted in an increased population of elderly residents. These factors indicate that the potential effects of being underprepared for natural disasters are growing. Therefore, it is critical that the State do more to ensure that local jurisdictions are as prepared as possible.

As we describe in the Introduction, the State recently invested \$50 million to build resiliency in vulnerable communities. It awarded about \$15.5 million of the funding to community organizations and cities and counties to help those entities develop more robust citizen emergency response efforts. However, none of the grant awards have directly funded local jurisdictions' efforts to develop emergency plans that ensure that they meet their communities' access and functional needs or that they involve representatives of groups with access and functional needs in their emergency planning processes.

It is critical that the State do more to ensure that local jurisdictions are as prepared as possible.

As the State's leader in emergency management, Cal OES is best positioned to provide the necessary expertise to conduct reviews of local jurisdictions' emergency management plans.

Although recent changes to state law will likely improve planning efforts, the changes do not provide accountability for ensuring local jurisdictions develop effective emergency plans. Effective January 2017, state law requires cities and counties, upon the next update to their emergency plans, to integrate access and functional needs into the plans by addressing, at a minimum, how individuals with access and functional needs are served by emergency communications, emergency evacuation, and emergency sheltering. Further, recent changes to state law, effective January 2020, require cities and counties to include representatives of people with access and functional needs during the next update to their emergency plans to ensure that they integrate those needs into their plans. Another change, also effective January 2020, requires cities and counties to integrate cultural competence into their plans in the areas of emergency communications and evacuations, among others. However, the State continues to have a gap in accountability for ensuring that local jurisdictions engage in effective emergency planning. Unlike in California, state laws in Florida and Texas require each state's emergency management division to establish standards for and to periodically review local jurisdictions' emergency management plans. A similar requirement in California could direct Cal OES to review and provide feedback to local emergency management agencies on the extent to which their plans effectively incorporate emergency management best practices, especially related to protecting and assisting people with access and functional needs.

If Cal OES were to report the results of those reviews publicly, it would provide public accountability for local emergency management agencies. As the State's leader in emergency management, Cal OES is best positioned to provide the necessary expertise to conduct these reviews. It is also the appropriate entity to assist local jurisdictions in bringing their plans into alignment with best practices to ensure that they are best prepared to protect their communities.

The counties and Cal OES varied in their perspective about Cal OES oversight. Butte was agreeable to Cal OES conducting reviews of emergency plans; however, its county administrative officer expressed doubt that the county could modify its plans to meet the standards that Cal OES sets for these reviews without funding from the State. Similarly, Sonoma indicated that in order to meet the standards that Cal OES sets, the county would need funding from the State. Ventura's staff emergency manager stated that it would be helpful to have Cal OES review the county's emergency operations plan but not its supporting plans because there are far too many and he would not want such a review to inhibit the county's progress. Cal OES's acting deputy director of response operations shared that it already reviews emergency plans when counties and other local jurisdictions choose to share their plans with Cal OES's regional offices. He explained that the review

is a crosswalk to ensure that all required structural elements of an effective emergency operations plan are incorporated in the counties' and local jurisdictions' plans. We reviewed the crosswalk that Cal OES uses to review local jurisdictions' plans and found that it does not incorporate a review of the extent that local jurisdictions incorporate best practices; rather, it reviews the extent to which the plan implements the State's emergency management system. The acting deputy director further noted that Cal OES was not currently staffed to perform statewide plan reviews, so any changes to its responsibility would also need to be accompanied by additional resources.

Recommendations

Legislature

To ensure that local jurisdictions develop emergency plans that include adequate measures to protect and assist all people in their communities, including those with access and functional needs, the Legislature should require Cal OES to do the following:

- Review each county's emergency plans to determine whether the plans are consistent with FEMA best practices, including those practices that relate to adequately addressing access and functional needs. The Legislature should require Cal OES to review 10 county plans each year, prioritizing counties that we included as part of this audit and that are at high risk for natural disasters.
- Report the results of its plan reviews to the Legislature and on its website at least once every year.
- Provide technical assistance to counties in developing and revising their emergency plans to address the issues that Cal OES identifies in its review.
- Include representatives of people with a variety of access and functional needs in its review of county emergency plans.

Counties

To best prepare to protect and care for people with access and functional needs, the counties should revise their emergency plans by following the best practices that Figure 11 identifies. The counties should begin implementing these practices as soon as possible. By no later than March 2020, the counties should develop a schedule for completing updates to their respective emergency plans.

Figure 11
Emergency Planning Best Practices

To improve their ability to protect people with access and functional needs during natural disasters, local jurisdictions should implement the following best practices:



EMERGENCY PLAN DEVELOPMENT

- Use a diverse planning team, including people with a variety of access and functional needs and community organizations that support them.
- Conduct demographic assessments to identify how many people have access and functional needs and what their needs are.
- Update emergency plans frequently, including after major disasters and changes in operational resources.



ALERT AND WARNING

- Develop alert and warning plans that contain strategies to reach all people, including people who have access and functional needs, and ensure that all applicable methods are used to reach individuals.
- Create a library of pre-scripted messages for each potential hazard that contain the recommended elements for effective messages and that are translated into the languages most commonly used in the community.



EVACUATION

- Develop all-hazard evacuation plans, including strategies for providing evacuation assistance to people with access and functional needs.
- Assess the number and locations of people who may need evacuation assistance. Inventory the local jurisdiction's resources to determine its capability to provide that assistance.
- Establish agreements with local transit agencies and other sources of accessible transportation to provide evacuation support.



SHELTERING

- Develop sheltering plans that include strategies for ensuring that shelters are accessible to people with access and functional needs.
- Assess how many people may seek shelter during natural disasters, how many of them may have access and functional needs, and what resources the local jurisdiction will need to support them in shelters.
- Establish agreements with suppliers for necessary equipment and resources to support shelter residents with access and functional needs.



LOCAL ASSISTANCE CENTERS

- Develop a plan to ensure that local assistance centers are accessible to people with access and functional needs, including communication services for those with limited English proficiency.

To ensure that they maintain updated emergency plans that are consistent with current best practices, the counties should adopt ordinances establishing requirements for the frequency with which they must update their emergency plans and should set that frequency at no greater than five years.

To ensure that their emergency planning efforts more fully account for people with access and functional needs in the future, the counties should adopt county ordinances that require their county emergency managers to do the following during each update to their emergency plans:

- When planning to protect people with access and functional needs, adhere to the best practices and guidance that FEMA, Cal OES, and other relevant authorities have issued.
- Report publicly to their boards of supervisors during emergency planning about the steps they have taken to address access and functional needs.
- Consult periodically with a committee of community groups that represent people with a variety of access and functional needs. Further, the counties should require that representatives of the community group committees present to the boards of supervisors their review of the adequacy of the emergency plans.

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Chapter 2

CAL OES HAS NOT PROVIDED LOCAL JURISDICTIONS WITH CRITICAL GUIDANCE ON PROTECTING VULNERABLE POPULATIONS

Cal OES's mission is to protect lives and property, build the State's emergency response capabilities, and support communities for a resilient California. As a part of that mission, we expected that Cal OES would assist local jurisdictions in developing emergency plans that include effective strategies for protecting people with access and functional needs during natural disasters. However, Cal OES has not taken several important steps to provide that support. For example, it has not given local jurisdictions required guidance related to identifying people with access and functional needs and to evacuating these populations during natural disasters, despite state laws requiring it to do so. Further, it has not modeled best practices by involving people with access and functional needs in the development of key planning and guidance documents. Finally, Cal OES has not created and disseminated timely after-action reports that would help local jurisdictions learn from others' successes and mistakes during the response to natural disasters. Cal OES's failures to provide critical guidance to local jurisdictions have impeded its ability to fulfill its mission to support local jurisdictions.

Cal OES Has Not Adequately Supported Local Jurisdictions in Their Planning to Assist People With Access and Functional Needs During Natural Disasters

State law makes Cal OES responsible for the State's emergency and disaster response services, including activities necessary to prevent and respond to the effects of disasters on people. Because of this assigned responsibility, we expected that Cal OES would be effectively supporting local jurisdictions in planning to protect the significant percentage of the population who are likely to have access or functional needs during an emergency. Specifically, we expected it to have provided resources to help local jurisdictions in planning, made those resources readily available, and involved representatives of people with access and functional needs in developing its guidance and in maintaining the State's emergency management system. However, as Figure 12 shows, Cal OES has not adequately done so. Because of these deficiencies, Cal OES has not done enough to fulfill its mission to protect lives and support communities' abilities to withstand and recover from natural disasters.

Figure 12

Cal OES Has Not Taken Key Steps to Support Local Jurisdictions in Planning to Meet Access and Functional Needs During Natural Disasters

Because it is the State's lead emergency management agency, we expected Cal OES to do the following:



Adhere to all state laws that require it to provide important resources about access and functional needs to local jurisdictions



Maintain an easily navigable set of guidance for planning to assist people with access and functional needs

Involve people with a variety of access and functional needs when developing and approving guidance



Cal OES has done none of these things.

Source: FEMA best practices, state law, charters and meeting documentation for the Cal OES committees that develop and approve guidance, Cal OES planning guidance, the Cal OES website, and interviews with staff at Cal OES.

Despite the Requirements in State Law, Cal OES Has Not Provided Critical Guidance to Local Jurisdictions

Cal OES has not responded effectively to changes to state law that require it to provide support to local jurisdictions. In 2013, the Legislature amended state law to require Cal OES to update the state plan to include proposed best practices for local governments and nongovernmental entities in mobilizing and evacuating people with disabilities and others with access and functional needs. The amendment came because the Legislature found that too little of the state plan was dedicated to senior citizens and the needs of people with disabilities. However, Cal OES has not made these changes, and the state plan still contains no guidance on evacuating people with access and functional needs, nor does it direct local jurisdictions to any such existing guidance or best practices.

The manager of the unit at Cal OES responsible for updating the state plan asserted that Cal OES did not include these best practices because the state plan is a high-level framework meant to support statewide operations during an emergency. She explained that Cal OES decided to post the relevant evacuation best practices on its Office of Access and Functional Needs website instead. However, Cal OES did not notify the public or mention in the State plan that it decided to post these best practices elsewhere. Therefore, local jurisdictions that reviewed the State plan to find these best practices would have been unable to do so.

Further, although the Office of Access and Functional Needs' website does contain some guidance for mobilizing and evacuating individuals with access and functional needs, it does not direct local entities to perform the best practice of identifying their populations who might require evacuation assistance during an emergency. As we describe in the previous chapter, not identifying in advance which people within a community may need additional help in evacuating may result in an ineffective response during an emergency.

In addition, Cal OES has not fully complied with a state law related to the establishment of disaster registries, despite the fact that this law has been in effect for nearly three decades. Disaster registry programs are voluntary listings for which people with access and functional needs can sign up to be added to a list that first responders and others may use to provide alert and warning messages and to locate people to verify that they have evacuated. Since 1991 state law has required Cal OES to develop model guidelines for local jurisdictions that plan to develop disaster registry programs. Although Cal OES has released some guidance related to disaster registry programs, that guidance does not include all required elements. Specifically, state law directs Cal OES to publish guidance that includes recommendations for addressing known problems with the use of disaster registries, such as maintaining privacy for the people on the registry, as well as clarifying that the intent of the registry is not to provide immediate assistance during an emergency and that individuals must be prepared to be self-sufficient. However, the guidance that Cal OES has issued states that registries have proven unworkable, generally emphasizes concerns about registries, does not contain all of the information that state law requires, and provides little additional advice about how a local jurisdiction should manage a registry.

Cal OES's deputy director of planning, preparedness, and prevention acknowledged that Cal OES has not issued model guidelines in accordance with the law. She stated that the agency has not done so because staff at Cal OES consulted with local governments and stakeholders and determined that registries

Cal OES has not fully complied with a state law related to the establishment of disaster registries, despite the fact that this law has been in effect for nearly three decades.

present significant challenges related to privacy and maintenance. However, by disregarding registries rather than providing the required guidelines, Cal OES has failed to follow state law and has not issued guidance that could benefit local jurisdictions that do choose to implement disaster registries. Of the three counties we reviewed as part of this audit, only Butte maintained such a registry. To the extent that Butte or any other county could have benefited from guidance on registry management, Cal OES has failed to fulfill its mission of supporting communities through collaboration with local jurisdictions.

Finally, Cal OES has not adequately supported local jurisdictions in ensuring that they can quickly issue translated alert and warning messages during emergencies. Effective January 2019, state law requires Cal OES to develop alert and warning guidance and to create a library of translated emergency notifications that it must develop after taking into consideration the two most commonly spoken languages in California other than English. According to census data, those languages are Spanish and Chinese languages, including Mandarin and Cantonese. The law also requires Cal OES to produce a translation style guide that includes a glossary of translated standard abbreviations used in emergency notifications (translation style guide). Cal OES issued alert and warning guidance in March 2019 and included examples of alert and warning messages in English as part of that guidance. The director of emergency management at Sonoma told us that he had expected Cal OES to provide translated message templates when it released this alert and warning guidance. However, at the time we began this audit, Cal OES had not yet developed the templates and provided no clear plan for complying with this provision of state law.

After we repeatedly asked Cal OES about its plan for developing the templates and translation style guide, Cal OES informed us at the end of September 2019 that it had completed a set of translated messages in Spanish, and in early October, it published translated messages in 17 other languages. Although Cal OES posted these messages and indicated that they were sample messages for use by local jurisdictions, they are marked by deficiencies. Most importantly, the translated messages will not be helpful to emergency managers who do not already speak these languages because Cal OES has not provided a crosswalk of the English and translated versions of the templates. As a result, the guidance provides no indication of what the messages are about for someone who does not speak, for instance, Chinese or Armenian, which greatly increases the risk that local jurisdictions will not use the templates or will use the wrong message template in an emergency situation.

Although Cal OES posted translated messages in 18 languages and indicated that they were sample messages for use by local jurisdictions, they are marked by deficiencies.

Further, the sample messages that Cal OES developed are not templates that local jurisdictions can use to send messages specific to their circumstances. Rather, these sample messages are written and translated for very specific situations. For example, all three of Cal OES's sample translated shelter-in-place messages specify that residents must remain inside due to a hazardous materials release. Accordingly, without access to their own translation services, local jurisdictions would not be able to use this message to warn residents to shelter in place because of other hazards, such as flooding or an earthquake. Cal OES's translated messages stand in contrast to the templates Ventura developed: a variety of message templates in both English and Spanish for many potential hazards such as brush fires, smoke, and tsunamis.

Cal OES claimed it had also developed the translation style guide the law requires, but there are problems with the guide. In October, when it released the translated sample messages, Cal OES also released a foreign language style guide in English with glossaries of terms in English, Spanish, and Vietnamese. However, the terms that Cal OES translated do not concern specific threats that emergency managers could use to replace the sample message content. For example, as we discuss above, the sample messages included shelter-in-place orders specific to a hazardous materials release; therefore, if Cal OES had provided translated terms for other potential threats, such as wildfires, earthquakes, or floods, emergency managers could use these translations to amend the sample messages to fit their own circumstances. However, Cal OES did not include in its glossaries the translations for the words for wildfire, brush fire, earthquake, or flood. Rather, the glossaries of terms focuses predominantly on emergency management terminology—such as incident command system, mutual-aid agreement, and alert origination tool—and provides translations of those terms and their definitions. Finally, to the extent that Cal OES included useful terms in this style guide, it has still only provided translations in Spanish and Vietnamese—leaving untranslated the second most prevalent languages, Mandarin and Cantonese, and other languages commonly spoken in the State. These observations cause us to question the value of the glossaries to emergency managers who would attempt to use them to assist in issuing important emergency notifications.

Cal OES disagreed with our conclusion that it has not adequately supported local jurisdictions in the development of emergency plans that assist people with access and functional needs because it has not produced required guidance documents and tools. Staff at Cal OES pointed to other guidance it has produced to support local jurisdictions. We agree that the guidance that Cal OES has developed—such as the training course we discuss in the Introduction or the map of access and functional needs resources that it features on its website—can be useful as local jurisdictions

If Cal OES had provided translated terms for other potential threats, such as wildfires, earthquakes, or floods, emergency managers could use these translations to amend the sample messages to fit their own circumstances.

enhance their planning for people with access and functional needs. However, the guidance we focused on during our review is important and required by state law. As we indicate in the Introduction and throughout Chapter 1, the areas of evacuation and alert and warning are of critical importance for all residents, especially those with access and functional needs who are more likely to need additional assistance or alternate methods of communication. Therefore, the lack of adequate guidance in these key areas is a critical deficiency in Cal OES's leadership. As a result of this deficiency, local jurisdictions with primary responsibility for responding to emergency situations are left without key guidance that the Legislature and the Governor intended to be available to assist them in protecting lives during emergencies.

Cal OES Has Not Ensured That Local Jurisdictions Can Locate Its Guidance Regarding Access and Functional Needs

Cal OES has developed some guidance and tools for local jurisdictions to use in their emergency planning, including their planning to meet access and functional needs; however, it has not made those resources easily available to the local jurisdictions. Cal OES's website includes a page that it refers to as its *access and functional needs library*. However, locating any specific guidance on the library page is challenging because it consists of a list of almost 250 links to different websites and documents. Many of the links have vague names—such as “Feeling Safe, Being Safe” and “Show Me Communication Board”—and no descriptions accompany the links explaining the content visitors should expect to find. Additionally, Cal OES does not indicate which guidance is most valuable for local jurisdictions, so they must sort through less relevant guidance, such as guidance directed at hospitals or polling places, to find the information they need.

The chief of Cal OES's Office of Access and Functional Needs (chief) acknowledged that the access and functional needs library could be improved so that local jurisdictions can more easily navigate it. He stated that Cal OES would seek a contract to restructure and improve the webpage, but he also noted that it has not done so because of resource limitations. The chief further noted that he conducts outreach events throughout the State to provide guidance to local jurisdictions and that no one has complained to him about the access and functional needs library being inoperable. Nonetheless, until Cal OES improves the main online resource it provides, local jurisdictions attempting to use the library will likely face challenges in locating the information that would be most useful to them. This lack of organization is particularly detrimental to jurisdictions with fewer resources and less time to devote to emergency planning.

Locating any specific guidance on Cal OES's library web page is challenging because it consists of a list of almost 250 links to different websites and documents.

Cal OES Has Not Modeled Best Practices by Including Individuals With Access and Functional Needs When Developing Guidance

As it provides assistance to local jurisdictions in effectively planning for emergencies, Cal OES has not followed a critical best practice: involving individuals with access and functional needs. As Chapter 1 describes, FEMA and other organizations state that to ensure that emergency plans adequately address access and functional needs, emergency planners should include individuals with such needs or their representatives in the emergency planning effort. In addition, state law requires that to the extent practicable Cal OES include representatives of people with specific types of disabilities on the committees it uses to issue guidance to local jurisdictions and to develop and approve the State's system for emergency management. As of July 2019, Cal OES had seven such committees, including a committee for developing alert and warning guidance and another for improving Cal OES's process for documenting in after-action reports the lessons learned during natural disasters. However, Cal OES has not adequately involved people with access and functional needs on any of these committees.

The documentation that Cal OES provided to us shows that rather than involving a diverse group of people with access and functional needs, it placed the same individual—the chief of its Office of Access and Functional Needs—on six of the seven committees (the charter for the final committee does not list an access and functional needs representative among the committee membership). Although the chief is Cal OES's subject matter expert regarding access and functional needs, he is not representative of all access and functional needs populations. As we previously discuss, *access and functional needs* encompasses many needs or challenges that individuals may have. Emergency planners must plan to meet each of these varying needs or challenges, and people who have these needs are best positioned to provide suggestions on how to address them. Despite the subject matter expertise that the chief possesses, he cannot provide the same depth of insight on specific access or functional needs as people with those needs or their representatives can provide.

The chief agreed that having multiple subject matter experts on access and functional needs would be beneficial and that planning is better when it includes a broader diversity of perspectives. According to the chief, the representation of access and functional needs on these committees was negatively affected when the committees began meeting less regularly because of more frequent emergencies that required Cal OES's attention and involvement. However, Cal OES did not include these representatives on the rosters for any of its more newly formed committees, making us question whether it has made a sufficient effort to include

The chief agreed that having multiple subject matter experts on access and functional needs would be beneficial and that planning is better when it includes a broader diversity of perspectives.

The inadequate representation of individuals with access and functional needs on Cal OES's alert and warning committee may have contributed to gaps we observed in the guidance that the committee developed.

representatives with access and functional needs. For example, when it proposed members for the committee it created to develop the alert and warning guidance it published in March 2019, Cal OES did not include representatives of people with access and functional needs other than the chief. The chief noted the impracticality of ensuring that representatives of every possible access and functional need were included on every Cal OES committee and believed that effective representation of needs can happen through a smaller number of individuals. That perspective notwithstanding, state law is clear that Cal OES should strive to include persons with specific disabilities on these committees, and we believe that more full incorporation of the perspectives of individuals with access or functional needs would align Cal OES with best practices.

Given that communication is one of the key areas of emergency management requiring consideration of access and functional needs, the fact that Cal OES did not include a diverse set of individuals with such needs when developing its alert and warning guidance was a significant shortcoming. In fact, the inadequate representation of individuals with access and functional needs on Cal OES's alert and warning committee may have contributed to gaps we observed in the guidance that the committee developed. Cal OES issued the alert and warning guidelines after a change to state law that went into effect in January 2019. That change required Cal OES to develop guidelines for effectively notifying people with access and functional needs of emergencies. Such guidelines would reasonably address methods of alerting people who may, for example, be deaf, be blind, or have developmental disabilities. Although Cal OES's guidelines encourage local jurisdictions to make alert and warning messages accessible to people with those needs, they do not include strategies for doing so and instead list general considerations that jurisdictions should make. Had the committee included a diverse set of individuals with access and functional needs, those individuals could have provided perspective and insight on specific practices for effectively communicating emergency messages.

Cal OES's failure to ensure the diversity of its planning groups may have a detrimental effect on local jurisdictions. As the State's leader in emergency management, it is critically important that Cal OES set the tone for local jurisdictions by following emergency planning best practices, including those related to supporting individuals with access and functional needs. Individuals from local jurisdictions serve on some of Cal OES's committees and can therefore observe the extent to which Cal OES involves representatives of people with access and functional needs in these committees. When Cal OES does not include diverse representation, the risk is higher that local jurisdictions will not believe that the practice is worthwhile for their own planning efforts. Further, local jurisdictions should be

able to rely on the guidance that Cal OES provides regarding what to include in their emergency plans. If Cal OES's guidance does not fully address access and functional needs, the local jurisdictions' plans—like those in the three counties we reviewed—are also less likely to do so.

Cal OES Has Not Used After-Action Reports to Share Lessons Learned From Recent Disasters, Even Though Doing So Could Aid Local Jurisdictions' Planning Efforts

Cal OES is uniquely positioned to observe, collect, and disseminate information about lessons learned during natural disasters across the State. As the agency tasked with coordinating state resources and mutual aid in response to those jurisdictions requesting assistance during an emergency, Cal OES has the opportunity to observe those jurisdictions' successes and struggles during natural disasters. It can identify problems caused by gaps in the jurisdictions' emergency preparedness and determine how frequently similar issues arise across jurisdictions.

Further, implicit in Cal OES's mission to protect lives, build capabilities, and support communities is a responsibility to identify and take proactive steps to correct problems in emergency management that may jeopardize the lives of residents, including those with access and functional needs. Although Cal OES does not bear responsibility for local jurisdictions' shortcomings, it can play a critical role in helping local jurisdictions avoid the mistakes of others. In fact, for each declared disaster, state law requires Cal OES, in cooperation with other state and local agencies, to complete an after-action report, which includes a review of the public safety response actions. Cal OES completes these after-action reports in part based on a review of after-action reports that local jurisdictions complete and submit to Cal OES. In addition, the law requires Cal OES to make these reports available to all interested emergency management and public safety organizations. Therefore, the preparation of these reports presents Cal OES with a prime opportunity to share lessons learned and suggest corrective actions throughout the State. However, as Figure 13 shows, weaknesses in Cal OES's after-action report process have prevented it from sharing valuable information in this manner.

Perhaps most importantly, Cal OES has not completed its after-action reports in a timely manner. State law requires Cal OES to complete after-action reports within 120 days after a disaster. However, in a January 2019 meeting with Cal OES's state emergency system advisory board, the project manager responsible for improving after-action reporting at Cal OES shared with

Weaknesses in Cal OES's after-action report process have prevented it from sharing valuable information.

From January 2014 through December 2018, there were 65 proclamations of natural disasters in the State for which Cal OES should have completed after-action reports. However, Cal OES has not completed after-action reports for the disasters associated with 57 of these proclamations.

Cal OES's advisory board and its director that Cal OES has never completed after-action reports on time. From January 2014 through December 2018, there were 65 proclamations of natural disasters in the State for which Cal OES should have completed after-action reports. However, Cal OES has not completed after-action reports for the disasters associated with 57 of these proclamations. At the time of our review, the most recent disaster for which Cal OES had completed an after-action report occurred in February 2015, and it did not complete that report until May 2019—more than four years later. During those four years, numerous natural disasters occurred, including several of the largest and most destructive wildfires in California's history. As a result, multiple local jurisdictions have provided their own after-action reports from these disasters to Cal OES, and Cal OES could have used them to write and broadly disseminate an after-action report describing the lessons learned from those disasters. However, Cal OES has not distributed after-action reports from any of those events.

Figure 13
Cal OES Has Not Shared After-Action Reports That Could Have Strengthened Disaster Response



Source: Cal OES after-action report documents and interviews with staff at Cal OES.

The potential value that one jurisdiction could gain from learning about another's errors during emergency planning or response makes Cal OES's failure to complete timely after-action reports a serious concern. For example, as we discuss in Chapter 1, Sonoma and Ventura did not issue messages directing people to evacuate in languages other than English during the 2017 fires we reviewed. Had Cal OES issued after-action reports related to these two disasters, we would have expected the reports to include a review of the use of

English-only alert and warning messages due to the critical nature of communicating with all residents. In fact, each county provided Cal OES with its own after-action report that identified the trouble it had communicating with individuals who did not speak English. However, Cal OES has yet to issue after-action reports for these disasters. Subsequently, during the response to the Camp Fire in 2018, Butte also did not issue alert and warning messages in any language other than English. By sharing lessons learned from these natural disasters in a timely manner, Cal OES could help other local jurisdictions avoid this same mistake in future disasters.

In addition, by not issuing after-action reports, Cal OES has missed an opportunity to educate local jurisdictions about effective strategies that other local jurisdictions have employed during natural disasters. For example, during the December 2017 Lilac Fire, San Diego County (San Diego) used a specially trained team of Spanish language translators from various county departments to staff its county information center—which, during the time of the incident, was coordinating press conferences and posting information about the disaster online. In the after-action report that San Diego submitted to Cal OES, it reported that this team of translators increased the county’s ability to provide emergency information in Spanish. The effectiveness of this strategy could aid other counties seeking ways to improve their ability to communicate with people with limited English proficiency during natural disasters. However, as of October 2019, nearly two years later, Cal OES has not issued an after-action report for the Lilac Fire, which could have informed other local jurisdictions about San Diego’s effective use of a team of translators.

Cal OES has not set firm standards for completing after-action reports. Although state law requires it to complete the reports within 120 days, Cal OES shared with us that the date an incident is closed—which it believes begins the 120-day period—is not well defined. Despite this perspective, Cal OES has not taken action to better define that date, even though the minutes for the meetings of its after-action reporting committee show that committee members have acknowledged the need to do so. Given that the law requiring Cal OES to complete these reports became effective in January 1993, Cal OES has had more than enough time to correct any lack of clarity that exists in the required time frames for its completion of after-action reports, so we question the urgency of its efforts to produce those reports in a timely manner.

The branch chief who oversees the division responsible for creating after-action reports stated that some local jurisdictions involved in natural disasters do not submit their after-action reports to Cal OES and that Cal OES begins compiling its after-action report when all of the pertinent local agencies have submitted their

By not issuing after-action reports, Cal OES has missed an opportunity to educate local jurisdictions about effective strategies that other local jurisdictions have employed during natural disasters.

required documentation. However, multiple local jurisdictions have already submitted their reports to Cal OES, and it seems imprudent for Cal OES to delay after-action reports while it waits for the remaining jurisdictions to submit their reports. Given the benefit that sharing lessons can provide to local jurisdictions in improving disaster response, and the devastating effects that mistakes can produce, Cal OES's dissemination of those lessons in a timely fashion is critically important. Therefore, Cal OES should not delay issuing after-action reports because some local jurisdictions have not yet submitted their reports. The branch chief agreed that the process must become timelier to ensure that Cal OES captures and disseminates lessons learned as quickly as possible. In March 2019 Cal OES revised its process for collecting after-action reports from local jurisdictions to require only the legally mandated information related to the State's emergency management system and to allow local jurisdictions to submit their responses through an online portal. The branch chief explained that streamlining and shortening the number of questions will enable the after-action process to be timelier and to meet requirements. However, as of October 2019, Cal OES informed us that it has not issued any after-action reports using this process.

Even when Cal OES does complete after-action reports, it does not widely disseminate them or make them easily accessible to local jurisdictions. As we describe above, state law requires Cal OES to make its after-action reports available to all interested public safety and emergency management organizations. To achieve the greatest benefit from these reports, we expected Cal OES to publish them, likely by distributing them to local emergency managers or posting them on its website. Doing so would allow emergency managers in all local jurisdictions to quickly access the reports to learn about ways they can improve their emergency plans, response, and recovery. However, although Cal OES meeting minutes show that in June 2018 it discussed making reports available publicly, Cal OES told us during our audit that it requires local jurisdictions to request these reports. By making local jurisdictions request after-action reports rather than broadly disseminating them, Cal OES limits the number of local jurisdictions that can benefit from the lessons that those reports contain.

By making local jurisdictions request after-action reports rather than broadly disseminating them, Cal OES limits the number of local jurisdictions that can benefit from the lessons that those reports contain.

Cal OES explained that it does not share its after-action reports publicly because they contain sensitive information. However, Cal OES could distribute lessons learned without divulging sensitive or confidential information about the natural disasters under review. It could, for example, publish an annual report summarizing new or successful emergency response strategies, problems that occurred during incidents over the previous year, and recommendations for how to prevent them. It could also redact the sensitive or confidential information before publication.

Cal OES believed that it effectively shares lessons learned through alternate means besides the after-action reports. The chief of Cal OES's emergency response section stated that Cal OES shares lessons learned from natural disasters verbally at mutual aid regional advisory committee meetings, which, according to Cal OES documentation, allow local jurisdictions to be informed of the latest information on emergency management and on the State's emergency management system. However, we reviewed meeting minutes and agendas for those meetings and found that although the minutes stated that some local jurisdictions shared lessons learned during those meetings, several local jurisdictions did not attend the meetings, meaning that they would not have benefited from those discussions. Similarly, although the chief asserted that he presents lessons learned related to meeting access and functional needs when he attends functions and events throughout the State, those lessons could only benefit the local jurisdictions that attend the functions he visits and the chief cannot reasonably visit every local jurisdiction in the State each year. Because it has not widely publicized lessons learned from recent disasters, through after-action reports or any other means, Cal OES has failed to broadly distribute information that could help local jurisdictions across the State learn from the experiences of others and improve their ability to effectively respond to natural disasters.

Recommendations

Legislature

To ensure that, as the leader of emergency response efforts in California, Cal OES meets its responsibility to provide local jurisdictions with critical support in planning to meet access and functional needs of the population during natural disasters, the Legislature should require Cal OES to do the following:

- Involve representatives of individuals with the full range of access and functional needs in the development of the state plan, the state emergency management system, and the guidance and training it provides to local jurisdictions.
- Assess local jurisdictions' emergency response and recovery efforts during natural disasters, review their after-action reports to identify lessons learned, and annually disseminate guidance summarizing those lessons.

Cal OES

To ensure that it fulfills its responsibilities under state law, Cal OES should, by no later than June 2020, issue the guidance that state law requires it to produce related to access and functional needs, including guidance related to establishing disaster registries and guidance on evacuating people with access and functional needs.

To ensure that it adequately equips local jurisdictions to send alert and warning messages in languages that their residents will easily understand, Cal OES should do the following:

- Provide clear direction to individuals who speak English so that they know which of the translated messages they should use in what specific circumstances.
- Revise the messages it has provided so that local jurisdictions can more easily adapt them for use in a variety of disaster situations.
- Expand its style guide to include terminology that emergency managers are likely to need to effectively modify their local messages and also to include translations for the other commonly spoken languages in the State.

To improve local jurisdictions' ability to quickly retrieve guidance and resources related to planning to meet access and functional needs during natural disasters, Cal OES should make its emergency planning guidance and resources easily available through restructuring and improving its access and functional needs library webpage by April 2020.

We conducted this audit under the authority vested in the California State Auditor by Government Code 8543 et seq. and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives specified in the Scope and Methodology section of the report. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,



ELAINE M. HOWLE, CPA
California State Auditor

December 5, 2019

Appendix A

RESOURCES THAT THE STATE AND FEDERAL GOVERNMENT MAKE AVAILABLE TO DISASTER SURVIVORS AFTER A NATURAL DISASTER

Table A lists the services and financial assistance that the state and federal governments make available to disaster survivors following natural disasters. Table A does not include assistance or services that are not specific to natural disasters; rather, it lists assistance or services for which the disaster survivors may become eligible as a result of the impact of a natural disaster, such as services available to people with low incomes.

Table A
Selected State and Federal Assistance for Survivors of Natural Disasters

STATE	GENERAL ELIGIBILITY	KEY PROGRAM OR SERVICE BENEFITS
<i>Department of Social Services State Supplemental Grant Program</i>	Individuals who have received the maximum housing assistance from FEMA.	Assists with rental housing; repairing/ replacing homes and personal property; cleaning and debris removal; and disaster-related illness, injury, or funeral costs.
<i>Disaster CalFresh</i>	Disaster survivors who do not exceed certain income limits.	Provides one month's worth of food benefits that can be used to purchase food at authorized retail stores.
<i>Department of Motor Vehicles</i>	Disaster survivors.	Replaces certain DMV documents, such as driver's licenses and vehicle registration, at no cost if lost or damaged due to a disaster.
<i>CalWORKS Program</i>	Families that become homeless as a result of a declared natural disaster.	Provides temporary and permanent homeless assistance.
<i>Board of Equalization</i>	Owners of real property and certain other property types damaged by declared natural disasters, as permitted by county ordinance.	Provides property tax relief.
<i>Employment Development Department</i>	Workers unemployed due to a disaster or emergency.	Provides unemployment insurance, disability insurance, or paid family leave. In addition, assists individuals in applying for federal Disaster Unemployment Assistance (DUA) when authorized by the President.
<i>Franchise Tax Board</i>	Taxpayers who experience disaster losses.	Provides guidance in obtaining tax relief for disaster losses.

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FEDERAL	GENERAL ELIGIBILITY	KEY PROGRAM OR SERVICE BENEFITS
<i>American Red Cross (Red Cross)*</i>	Disaster survivors.	Provides shelter, food, bulk distribution of needed supplies, first aid, and welfare information.
<i>FEMA Individuals and Households Program</i>	People affected by a declared disaster who have uninsured or underinsured necessary expenses and serious needs.	Provides financial housing assistance for rent, home repairs, and home replacement. Also provides direct housing assistance, such as manufactured housing units, when survivors cannot use rental assistance because they lack housing resources.
<i>FEMA Individuals and Households Program Other Needs Assistance Provision</i>	Disaster survivors who apply for a U.S. Small Business Administration disaster loan and are either denied or can demonstrate that the loan does not cover all their necessary expenses.	Provides financial assistance for funeral expenses, medical expenses, moving and storage expenses, and repair or replacement of personal property, including clothing, household items, transportation, and other property.
<i>FEMA Transitional Shelter Assistance</i>	FEMA-registered disaster survivors, displaced from their residence because of a disaster.	Provides short-term stays in hotels or motels.
<i>U.S. Small Business Administration Disaster Loan Assistance</i>	Homeowners and renters in declared disaster areas. Individuals do not need to own a business.	Offers low-interest, long-term loans to repair or replace homes, refinance mortgages, and replace damaged or destroyed personal property.
<i>United States Department of Agriculture (USDA) Rural Development</i>	Low-income homeowners in rural areas.	Provides loans and grants to help with repairs from damages caused by disasters. Individuals can also receive priority for renting USDA-financed rental housing.

Source: Disaster relief documentation from FEMA, Cal OES, California Department of Social Services, and the websites for the disaster programs and services contained in Table A.

* We included the Red Cross as a federal resource available to disaster survivors because as we mention in the report, the Red Cross has a federal charter to provide relief across the country during natural disasters.

Appendix B

SCOPE AND METHODOLOGY

The Audit Committee directed the California State Auditor to examine emergency plans for the safe and efficient evacuation of residents with access and functional needs in counties that have experienced natural disasters. We reviewed the extent that three counties—Butte, Sonoma, and Ventura—have incorporated best practices related to protecting people with access and functional needs during natural disasters into their emergency plans. We also reviewed the extent to which Cal OES has provided key guidance to local jurisdictions to support them in planning to meet access and functional needs. We did not assess particular claims or complaints, nor did we evaluate or reach conclusions about matters pending before various legal tribunals whether related to liability, fault, damages, or any related issues. Table B below lists the objectives that the Audit Committee approved and the methods we used to address them.

Table B
Audit Objectives and the Methods Used to Address Them

AUDIT OBJECTIVE	METHOD
<p>1 Review and evaluate the laws, rules and regulations significant to the audit objectives.</p>	<p>Reviewed relevant federal and state laws, rules, regulations, and best practices related to emergency management, emergency plans, and access and functional needs.</p>
<p>2 Review a selection of after-action reports that cities and counties have filed with Cal OES and other available sources of information for recent emergencies and disasters, including wildfires, to identify lessons learned regarding assisting individuals with access and functional needs during and after the incidents.</p>	<ul style="list-style-type: none"> • Reviewed a selection of Cal OES's after-action reports, after-action reports that local jurisdictions submitted to Cal OES, and other reviews of response and recovery for recent natural disasters, and documented commonly reported challenges in meeting access and functional needs. • Reviewed Cal OES's after-action report process and interviewed staff at Cal OES and local jurisdictions regarding that process.

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AUDIT OBJECTIVE	METHOD
<p>3 For a selection of three counties that have recently experienced natural disasters, evaluate the counties' processes for ensuring that individuals with access and functional needs are accounted and cared for before, during, and after an emergency or disaster by doing the following:</p> <p>a. Identify requirements in state and federal law and best practices for emergency response regarding accounting for and assisting individuals with access and functional needs—such as elderly residents and residents with disabilities—during emergencies, including emergency communication, evacuation, and sheltering. Assess the counties' emergency plans, including whether the plans adequately incorporate those requirements and best practices.</p> <p>b. Determine the extent and frequency with which the counties have reviewed and updated their emergency plans and have incorporated lessons learned from recent emergencies and disasters to ensure that those with access and functional needs are evacuated in a safe and efficient manner.</p> <p>c. Identify and assess the resources and programs the counties make available to individuals with access and functional needs following an evacuation.</p>	<ul style="list-style-type: none"> • Selected three counties—Butte, Sonoma, and Ventura—that had recent, significant natural disasters. • Reviewed the counties' emergency plans and interviewed county staff to determine the extent to which the plans complied with state law and incorporated key best practices, as well as the frequency with which the counties updated their plans. • Reviewed available emergency response records from the Camp, Sonoma Complex, and Thomas Fires to assess the extent to which planning and preparedness efforts affected the counties in the areas of alerting, evacuating, and sheltering people with access and functional needs. • Reviewed the counties' plans and other documentation to determine the extent to which the counties made revisions to their plans following their respective fires to incorporate best practices and lessons learned. • In each county, interviewed representatives of and collected documentation from community organizations representing individuals with a variety of access and functional needs to learn the experiences of the people whom they represent during the recent fires and to determine the extent to which those organizations have been involved with county planning efforts. • Reviewed the counties' plans for establishing local assistance centers to connect people with disaster support resources and programs following natural disasters. We reviewed available records and interviewed county staff regarding the local assistance centers that the counties established during their recent fires. We documented the disaster resources and programs that state and federal government entities provide to people impacted by a disaster.
<p>4 For the counties selected for Objective 3, determine what additional resources, information, or guidance they require to develop effective emergency plans, including whether changes to statewide policy are necessary.</p>	<ul style="list-style-type: none"> • Reviewed the training and guidance that Cal OES and FEMA make available to local jurisdictions for developing plans that incorporate strategies for assisting people with access and functional needs. • Reviewed state laws and regulations related to emergency planning, including planning to meet access and functional needs. • Interviewed staff at each county regarding what additional resources, information, and guidance they require.
<p>5 Determine the number of casualties that have occurred as a result of an emergency or disaster over the last five years, including, to the extent possible, the proportion of casualties that were individuals with access and functional needs.</p>	<ul style="list-style-type: none"> • Interviewed staff at Cal OES and the California Department of Public Health and determined that these entities do not track the number of casualties from natural disasters. • Obtained death records from each county we reviewed for all deaths that the counties determined were related to natural disasters. Reviewed death records to determine the proportion of those casualties who may have had access and functional needs.
<p>6 Review and assess any other issues that are significant to the audit.</p>	<p>Did not identify any additional significant issues.</p>

Source: Analysis of the Audit Committee's audit request number 2019-103, as well as information and documentation identified in the table column titled Method.



Butte County Administration

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October 22, 2019

Elaine M. Howle*
California State Auditor
621 Capital Mall, Suite 1200
Sacramento, CA 95814

RE: Butte County Response to the State Auditor's Report on Emergency Planning

Dear Ms. Howle:

Butte County ("County") appreciates the Legislature's interest in emergency planning in counties recently struck by large disasters, as well as the State's work in auditing Butte County's planning documents and emergency operations plans based on FEMA and CalOES guidelines and best practices and providing recommendations for improvement. In reality, most of FEMA's guidelines and best practices do not take into account large-scale, catastrophic wildfires in counties with limited financial and public safety resources. FEMA's guidance has historically focused on hurricanes and flooding, which allow for advanced notice and planning. Wildfires happen with no notice, unlike hurricanes and floods. The County understands that new regulations, guidelines, and best practices for devastating wildfires experienced by many California counties in the past two years, will be published in the future.

①

The audit report ("report") reflects the State Auditor's responsibility to cast a critical eye on matters it is charged with reviewing. The analysis highlights areas where improvements can be made. The County strives to improve response efforts after every disaster, and the recommendations will be considered along with input from other valued partners. The County is already implementing, or began implementing after the Camp Fire, many of the protocols regarding alerts, warnings and evacuations that are called out in the report. For the practices not already implemented and that are appropriate for Butte County, the County intends to implement them over time as resources become available.

②

General Response

It is important to define the structure for emergency response in Butte County to provide context to the report, as every county in California is structured differently to meet its individual needs.

③

* California State Auditor's comments begin on page 89.

- The Office of Emergency Management is responsible for plans such as the Emergency Operations Plan and the Local Hazard Mitigation Plan. It is also responsible for the operation of the County's Emergency Operations Center, for providing support such as public information, care and sheltering of humans and animals, roads and bridges closures and emergency repairs, physical and mental health support to shelters, coordination with local partners (i.e., health care facilities, utility/water districts, cities, etc.) and coordination with State and federal partners. Many County employees from departments throughout the organization are trained and participate in the Emergency Operations Center when it is activated. When the County does not have sufficient resources to address a disaster, it requests resources through the State.
- Certain departments, such as Public Health, Public Works, and General Services, operate Department Operations Centers to support the Emergency Operations Center. The Public Health Department, through its Department Operations Center is responsible for coordinating and processing requests for health and medical resources through the State.
- The Sheriff's Office is responsible for alerts, warnings, and evacuations, including the planning associated with those functions. The Sheriff's Office utilizes the State's mutual aid system to request additional resources when local resources are no longer sufficient.
- The Fire Department, in addition to responding to fires and medical calls, assists in planning for, training for, practicing, and implementing evacuations. The Fire Department also depends on the State's mutual aid system when local resources are no longer sufficient.

④ It is also important to understand the order of magnitude and speed of the Camp Fire, a fire so devastating and fast that no plan could adequately address it. To put the fire in perspective, 83,000 acres were burned in the first 15 hours. On average that is 5,533 acres every hour, 92 acres every minute, or 1.5 acres every second. Within 75 minutes of the fire first being reported, there were spot fires on the eastern side of Paradise which is eight (8) miles away from the origination of the fire. Within another 60 minutes the fire had progressed halfway through the Town of Paradise. The speed of this fire overwhelmed all first responders and was unprecedented in California in its destruction. Due to the extreme chaos, the speed of the fire, and the loss of power, landlines, Internet connections, and cellular networks in the area, along with downed power lines, poles, and trees, navigating the area of Paradise was extremely difficult and dangerous for the public evacuating and for first responders. Communications were near impossible due to destroyed and damaged infrastructure, loss of power, and thick smoke. As evacuation routes became impassable and vehicles caught fire, sheltering in place became a necessity. Bodies of water and open areas such as parking lots and helipads saved many lives.

Wildfires are a danger throughout California, and the amount of planning and mitigation that is needed to be ready for a catastrophic fire like the Camp Fire far exceeds available local resources. The California Office of Emergency Services (CalOES) exists to support local

government when it lacks adequate resources to respond. The State's mutual aid system is in place to obtain the resources needed on behalf of the impacted jurisdiction. No jurisdiction in California has sufficient resources for a catastrophic and large scale disaster like the Camp Fire.

The County agrees that plans serve an important purpose, and that training and practicing execution of the plans assists in identifying whether the theories in the plan are executable in reality. Butte County knows this too well as it has experienced more disasters than most counties. Ideally, all County planning documents would be updated on a regular basis. Unfortunately, the County lacks the resources to update all of its plans as often as it desires, as it has been faced with one disaster after another in recent years. Even though plans are not updated frequently, Butte County is better prepared than most California counties for future natural disasters due to its extensive experience over the past decade. Residents are not at a greater risk just because the County has not had the resources to thoroughly document these efforts.

⑤

Planning for wildfires is complicated. Wildfires have erratic behavior, and depending upon conditions they can move rapidly, well beyond the speed of humans, vehicles and even communication transmission. During wildfires, decisions must be made in the moment and emergency response must be nimble enough to adjust to changing circumstances. Though the report appears to make planning more important than response, the County knows from decades of experience in disasters that planning is helpful, but is not the only indicator of success in responding to disasters. Effective emergency response depends on training, experience, and the ability to make decisions under critical and fast-moving circumstances; something the County is proud to say it has done well.

⑥

The County concurs that plans have not been updated. There are two major factors that contribute to the lack of updates: 1) the impacts of the Great Recession on the County's financial and staffing resources since 2009-10 and 2) multiple disasters since 2016 – eleven disasters consolidated into eight local declarations (four of the eight included Presidential declarations and seven of the eight included State declarations). The County's plan, once the effects of the Great Recession lessened, was to update its emergency plans in 2017, but responding to disasters became a priority over updating plans. The work required of staff does not end once emergency response is over. Recovery efforts often require more time and resources. The amount of administrative reporting, document management, and tracking that is required for federal and State assistance is tremendous. The staffs responsible for updating plans have been required to focus on responding to disasters and obtaining reimbursement for the County, which has been a continuous cycle since the middle of 2016. The County would welcome financial and technical assistance from the State to update County planning documents in the future.

The County does not concur with the statement that lack of documentation and updated plans, and not following all best practices for planning, equates to not being prepared or having inadequate response and recovery efforts. Unfortunately, due a lack of County documentation, the report does not discuss or recognize the extensive planning, training, and community drills

⑤

that have been done by Butte County over the past decade. The County provides many examples of excellent planning efforts and process improvements that have been put in place over the years, and as recently as post-Camp Fire, in Exhibit A to this response. The County does appreciate the report's recognition of the many remarkable efforts and even heroic acts by many during the Camp Fire.

- ⑦ The timing of the report is especially unfortunate, as Butte County and its residents are still in the midst of emergency response and recovery, and have yet to fully address the trauma felt by its residents. The report's timing caused additional burden as County staff had to divert their time to accommodate the audit and prepare this response, in place of providing vital services to residents. The County recommends that future reports on large and traumatic events be timed further out from the event to avoid further traumatizing disaster survivors and workers, who in the case of the Camp Fire are often one in the same. The County also suggests that the State Auditor's Office considers providing adequate time for jurisdictions to review and respond to audit reports. A few hours for review and five working days for response are especially difficult for a jurisdiction in the midst of recovery efforts from a catastrophic event.

- ⑧ Provided below are the County's responses to the recommendations in the published report. The County understands the purpose of the audit was to review emergency planning efforts, though it appears to have expanded its scope to include discussing response efforts during the Camp Fire and drawing conclusions based on limited information from interviews with a handful of County staff and some local partners over a short period of time. Given sufficient resources and fewer disasters, the County would have updated plans. The County does not agree with statements that the County does not preplan to obtain resources needed in a disaster because it doesn't have signed agreements in place. It is important to note that no amount of documented plans and signed agreements would change the lack of availability of resources in the County and surrounding areas due to the non-urban nature of Northern California, or throughout the State when multiple disasters are taking place simultaneously in California or the nation.
- ⑨

Recommendations

The report contains recommendations for the Legislature to place additional requirements on CalOES. The County would welcome the increased participation by CalOES in assisting with and reviewing local emergency plans. The County stresses that financial and technical resources for under-resourced counties are urgently needed to assist with planning efforts, though.

Recommendations for Butte County:

- 1. Update emergency plans by following best practices provided in Figure 11 in the report, as soon as possible, and should develop a schedule for completing updates by no later than March 2020.**

Butte County agrees that its emergency plans need to be updated, and not just for individuals with access and functional needs. Butte County has been planning for such an update since 2016. Unfortunately, the County has not had the financial or staffing resources to begin an update due to multiple disasters beginning in the middle of 2016 (floods, wildfires, Spillway Incident, PG&E planned power shutoffs), as well as the impact the Great Recession had on the County's available financial and human resources. The same staffs that are responsible for emergency planning are also responsible for response and recovery. Until the County has completed the Camp Fire response and recovery, which could be years, it is unable to take on any additional duties without additional financial and staffing resources. Fire debris removal, hazard tree removal, housing, and financial survival are the County's focus at this time. The County will work on a schedule for updating plans, though updates will most likely not be completed in 2020.

In addressing the recommendations in Figure 11, which are specific to access and functional needs populations and required by State law after January 2020, the County's process will include the following in its next plan update.

Emergency Plan Development

- A diverse planning team with additional focus on the access and functional needs population, and interested community-based organizations that serve the population.
- Continued utilization of the data historically utilized by the County including Census data, data from County health and human services departments and community organizations, PG&E medical baseline data, and CalOES resources, to assess needs. ⑩
- Emergency plans will be updated as resources are available, with a goal of every five years.

Alert and Warning

- The Sheriff's Office completed an updated alert and warning plan in October 2019. ⑪
- The Sheriff's Office completed creation of pre-scripted messages in October 2019.

Evacuation

- The County has an all-hazard mitigation plan, and as resources are available, will update elements that do not reflect current practices and conditions. ⑫
- The County has access to multiple data sources (Census, medical baseline, Special Needs Awareness Program (SNAP) registry, etc.) regarding people who might need evacuation assistance. The County utilizes that data for pre-planning and during every disaster. Real time data and mapping is required during any disaster, not data that is contained in a plan from a point-in-time. ⑬

- Though an agreement is not necessary with the local transit agency, as the County is a member of the agency and can access buses whenever requested during an emergency, the County will request a formal agreement with BCAG. The County will also request a formal agreement with the Butte County Office of Education and local school districts for use of school buses, though the resources have been used in past disasters without an agreement. Ambulance transportation is accessed through the State and the mutual aid process.

Sheltering

- The County has an established sheltering plan and assessments of shelter facilities that provide details on which facilities can support access and functional needs individuals. Butte County will update the plans as necessary and as resources are available.
- The County has historical data from multiple disasters that provides a good assessment of how many people may seek shelter during disasters, as well as how many have access and functional needs and the resources needed to support them. In addition, the County will continue to use the Bay Area Urban Areas Security Initiative shelter planning tool that calculates shelter estimations based on population to plan for needed resources. The tool incorporates the best practices from FEMA and CalOES.
- The County will continue developing agreements with vendors, where equipment and resources are available in the area. For equipment and resources not available in the area, the County will continue to depend on the State to provide the resources.

Local Assistance Centers

- Butte County will continue to utilize the best practice guidelines established by CalOES and incorporate them into the County's Emergency Operations Plan. When a Local Assistance Center is opened, Butte County will continue to ensure that it is accessible and that communication services are provided for those with limited English proficiency.

2. *Butte should adopt ordinances establishing requirements for the frequency with which it must update its emergency plans and should set that frequency to no greater than five years.*

The County will consider adopting an ordinance as recommended, though it will have a caveat that it is a goal and not a requirement and will recognize that future disasters or competing priorities for limited resources may make meeting the frequency goal difficult. The County will not hold people accountable for a standard that cannot be met due to circumstances out of the control of the responsible party.

3. ***Butte should adopt county ordinances that require its county emergency manger to do the following during each update of its emergency plan.***
- ***Adhere to the best practices and guidance that FEMA, CalOES, and other relevant authorities have issued when planning to protect people with access and functional needs.***
 - ***Report publicly to the Board of Supervisors during emergency planning about the steps it has taken to address access and functional needs.***
 - ***Consult periodically with a committee of community groups that represent people with a variety of access and function needs and require that representatives of the community group committee present to the Board of Supervisors its adequacy of the emergency plans.***

The County strives to follows best practices for any type of planning. The County will convene a committee representing the populations described above, and hold periodic meetings for input on emergency plans, once there are financial and staff resources available for planning purposes. Staff will provide written updates to the Board of Supervisors during planning processes and will post the updates to the County's Office of Emergency Management website for the public. The County will consider the best tool for the participants to provide feedback on the plan to the Board of Supervisors.

The County expresses sincere appreciation to the Legislature for its interest in this important topic. The report underscores that under-resourced counties, such as Butte, need resources and technical assistance from the State. The County also thanks the State Auditor's staff for their professionalism and their efforts to accommodate challenging schedules as they attempted to review a very complex topic in a short amount of time. The County appreciates that some discussions were difficult for those who have not been through such a devastating disaster, and want to recognize that the State Auditor's staff are now a piece of the Camp Fire history.

Respectfully,



Shari McCracken
Chief Administrative Officer



Kory L. Honea
Sheriff-Coroner

Exhibit A

As the format of the report carries common themes throughout the findings, the County has chosen to organize specific information by those common areas, instead of following the order of the report. Provided below is detail behind each of the common areas that may be of interest to some readers. It is provided to acknowledge the hard work of the County and its partners, and recognized as County assertions where documentation was not available to support it for purposes of the report.

Emergency Planning

The report asserts that Butte County has not adequately followed best practices for emergency planning. The foundation of this assumption appears to be based on the fact that Butte County does not have an updated Emergency Operations Plan or clear documentation of all of its emergency response procedures and practices, which the County does not dispute. The finding does not take into account historical and current planning efforts by the County that have not been documented in a formal plan.

Butte County has collaborated extensively with stakeholders including CAL FIRE, California Highway Patrol (CHP), local law enforcement agencies, local emergency service providers, community organizations, Red Cross, CalOES and other State and federal agencies to develop protocols and practices for the response to emergency situations. Despite the fact that these established protocols and practices have not yet been codified in a single source document, they are part of Butte County's overall strategy to manage disasters. The protocols and practices have served the County well through multiple disasters and through after action review processes are improved upon each time the County faces a disaster and learns new lessons. The County appreciates that the report acknowledged that the County does have some updated response practices, even though they are not incorporated into a written plan.

Butte County has multiple sources of information on the demographics of its communities such as Census data, the Butte County Public Health Department's Community Health Assessment, supported living and health facility lists, and eligibility and client data from the Butte County Department of Employment and Social Services and other local service providers. Though it may not all be incorporated into a central plan, the County is aware of the facilities that house individuals with access and functional needs in its communities, as well as individuals living on their own. The Butte County Department of Employment and Social Services (DESS) maintains a database of people with access and functional needs. The database, as well as PG&E medical baseline customer data, is used for multiple purposes during disasters to reach out and communicate with individuals that might need assistance.

Though the County's All-Hazard Evacuation Plan has not been updated since 2011, it represents an incredible amount of effort and useful information to support disaster response. As part of the planning efforts, the Sheriff's Office worked collaboratively

with Butte County Fire, Paradise Fire, and CAL FIRE to identify zones in Oroville, Paradise, Magalia and other foothill communities to better facilitate evacuations of those areas, prior to the Camp Fire. Maps of those areas with evacuation routes were created and distributed to residents to help them be better prepared. Drills and training regarding the evacuation plans were held with community members, the plans and maps are posted on the County's website, and copies of plans and maps were provided to local fire safe councils to share. The Sheriff's Office has a close working relationship with Butte County Fire, Paradise Fire, CAL FIRE, and CHP and has developed sound evacuation coordination procedures for emergencies. Butte County, the Town of Paradise and CHP, developed contraflow traffic plans for evacuation routes out of Paradise and Magalia well before the Camp Fire, in anticipation of evacuations in those areas. Various types of traffic plans have been implemented in real life incidents, multiple times each year for the past several years throughout the County.

Planning for Adequate Resources

Butte County is aware of the needs of its residents with access and functional needs due to frequent disaster responses and by the nature of the day-to-day services the County provides through many of its programs, especially health and human services programs. The report specifically calls out evacuating and sheltering people and states that Butte County has not fully ensured the availability of critical resources that would be needed during a disaster. The County agrees it does not have formal agreements in place, but must disagree with the assessment that resources are not available as the County has adequately coordinated transportation and sheltering through multiple disasters. (22)

Regarding transportation for access and functional needs populations, the information in the database referenced previously is shared with the Sheriff's Office communications center so that in the event of evacuations Sheriff's Office dispatchers, if possible, can identify locations of people with access and functional needs. Once identified, first responders can respond to those locations to evacuate and assist the individuals. In addition, the Sheriff's Office and the Office of Emergency Management have pre-arrangements with the Butte County Association of Governments (BCAG), of which Butte County is a member, to provide buses and paratransit buses for evacuations. The resources may be ordered by the Sheriff's Office, or through the Emergency Operations Center, whichever is most expedient. In addition to County-provided transportation, individuals have the ability to call 2-1-1 to request assistance on their own, as BCAG and 2-1-1 have an agreement regarding paratransit resources. Ambulances for evacuating medically fragile individuals are ordered through the State's mutual aid process, as there are a limited number of ambulances locally. The State's mutual aid system, though not fully discussed in the analysis, is a key resource for all California counties in disasters. (13) (23)

The County agrees that it did not have adequate resources to evacuate all of the individuals with access and functional needs from the Camp Fire, as the rural road networks, the speed of the fire, and the devastation it was causing made it impossible to

get enough resources into the area to remove every person. The assertion demonstrates the report's recognition of the unprecedented nature of the most catastrophic wildfire in California history.

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A statement in the report requires clarification. The County does not wait to locate transportation during an emergency. It is well aware of the available resources. It is accurate to state that transportation is requested during disasters, as it is not possible to pre-order transportation prior to a disaster like a wildfire. During disasters, BCAG is notified as soon as the Emergency Operations Center is activated, and a request to dispatch appropriate transportation is made once the Sheriff's Office provides the location for staging. The County is aware that BCAG has sufficient buses for smaller events similar to the fires in 2017, and that it does not have sufficient buses for larger events as demonstrated during the 2017 Spillway Incident. Once BCAG resources are exhausted, the County requests support from the local schools. Butte County is not a large, urban county, so there are not multiple transit agencies or private transit services to contract with as you might find in urban areas like the Bay Area or Los Angeles.

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Statements that the County should have agreements with vendors for all of the resources needed to shelter access and functional needs populations is not realistic. The County has agreements for available resources in the area, and depends upon the State to assist in procuring equipment and resources the County cannot. The County has recommended to both CalOES and FEMA that they consider regional caches of items such as ADA bathrooms, showers, and cots, as the length of time it takes for the State or federal governments to get such resources is problematic.

Adequate Warnings and Alerts

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The County notes the assertion in the report that it did not prepare adequately to warn residents of danger from wildfires. That assertion does not take into account the complexities inherent with issuing alerts in "no-notice" events that almost immediately overwhelm the capacity of first responders and the systems in place to issue emergency notifications. It also does not take into account the County's efforts to provide alerts and warnings over and above the use of the CodeRED Alert Systems (CodeRED) to issue evacuation orders during the Camp Fire.

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That assertion appears to be based solely on the fact that the first several messages sent through CodeRED did not incorporate Wireless Emergency Alerts (WEA) and Emergency Alert System (EAS) messages through the Integrated Public Alert and Warning System (IPAWS), which was initially a product of the chaotic conditions under which the sole staff member available at that time to send messages, was operating under. As the day progressed and a better understanding of the situation was developed, the staff member attempted to issue WEA/EAS messages concurrently with CodeRED messages.

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Those WEA/EAS messages were not successful. When that was learned, BCSO worked with CodeRED to issue subsequent WEA/EAS messages. (BCSO continues to work with CodeRED to understand the cause of the initial breakdown and we have since developed

a protocol wherein emergency alerts are sent through CodeRED and a duplicate message is sent through IPAWS).

It is important to understand that a disaster the size of the Camp Fire is beyond the staffing capacity of most organizations, as agencies must staff to the norm and not to extreme circumstances. Under the circumstances of a normal disaster, staff would not have been immediately overwhelmed. The report does not acknowledge that the County initiated messaging to landlines in the affected area, in partnership with AT&T. Also, absent in the discussion is Voice over Internet Protocol (VoIP), which is the communication resource many foothill residents use due to lack of cell service availability. VoIP does not work when infrastructure is destroyed or power is out. In general, any technology-based alert systems, including WEA, EAS, and CodeRED, became useless as cell towers and infrastructure are destroyed quickly and power is cut off. This is evident in the rapidly decreasing delivery percentages illustrated in the Camp Fire notification lists. As the fire progressed and infrastructure failed, the percentages of successful notifications plummeted.

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Overall, the findings in the report illustrate the frailty of any alert and warning system that relies solely upon the wireless network to convey messages. Butte County recognized that frailty years ago and as a result developed other methods of communicating emergency information to impacted communities. During the Camp Fire, Butte County also disseminated information to its social media sites, websites and traditional media. Local news channels began broadcasting about the fire and the evacuations immediately. First responders used sirens to alert people while doing door-to-door notifications. First responders used public announcement systems from their vehicles. All of these methods of alerting and warning the public are in accordance with FEMA and CalOES best practices. The County utilized numerous resources to warn residents before and during the Camp Fire. There is no FEMA best practice that will provide for broad notifications during a catastrophic fire storm as was experienced during the Camp Fire.

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Butte County did not use template messaging during the Camp Fire, in part because templates had not yet been created by the State. In March 2019, 4 months after the Camp Fire, Cal OES released their Alert and Warning Guidelines. In October 2019, Cal OES released their library of messaging templates. The Sheriff's Office has since developed alert and warning guidelines and message templates in English, Spanish and Hmong, in compliance with the State's guidance. Important to note, the best practices referred to in the report do not take into account the inherent limitations of the WEA system with regard to its 90 character limitation. It is very challenging to convey a threat and the desired response in 90 characters, which is exacerbated when messaging in languages other than English, especially Hmong, as 90 characters cannot always accommodate translated messages.

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31 According to the California State Warning Plan, “Current common practice across all warning systems is to approach multilingual alerting on a best effort basis, but not to delay transmission of English language warning messages while multilingual translations are prepared.” Due to not having translation capabilities immediately available and the rapid spread of the Camp Fire necessitating multiple notifications, the County sent out alert and warning notifications in English.

32 The report states that because the Sheriff’s Office did not identify messages as coming from the County it did not follow best practices, and the messages may not have been trusted by the public. However, the combination of the messages, the first responders ascending into Paradise and Magalia with lights and sirens, the black smoke that was overtaking the Town of Paradise, the social media posts released by the County and Town, public social media posts, and news coverage, made it abundantly clear that the area was in imminent danger and the County was warning people to evacuate.

Access and Functional Needs

33 The report states that the County’s Special Needs Awareness Program (SNAP) registry only contains IHSS clients. The SNAP registry includes IHSS plus any individuals that self-identify as needing assistance. In addition, the County has access to PG&E’s medical baseline data to further enhance the registry. The County does continuous outreach to individuals and service providers to ensure individuals who might need assistance are included on the registry.

The County has coordinated with groups representing access and functional needs populations and will expand that outreach in the future, as the report states there are additional groups that are interested in participating.

Evacuations

The County has been extremely proactive in working with communities at risk of wildfires and creating evacuation plans. Community evacuation plans were mailed out to all residents as part of the “Ready, Set, Go” campaign in 2016, and extra copies were provided to fire safe councils in numerous communities, including the Town of Paradise. The plans include information on how people can identify which zone they live in. As the County has learned over the years, it takes multiple methods of providing information to reach as much of the public as possible and there is always the potential for not being able to reach everyone. Butte County and the Town of Paradise have worked to educate the public on the zone they live in, but there will always be some portion of the public who will not know what the plan is.

The County is working with other transportation and law enforcement partners to address the traffic congestion experienced in the Camp Fire, by planning to initiate contra flow at points further out from the event. As the County learned, contra flow is an excellent tool until it hits roads that are not set for contra flow.

The report does not recognize that sheltering in place is an emergency option when evacuation routes are not viable. Many lives were saved by jumping into a lake or congregating in open parking lots with minimal vegetation surrounding them. Though this may not be designated a best practice, it may be a reality in rural communities where roads cannot absorb traffic from a large event, and provides a good example of how the disaster dictates the actions and not just plans.

Local Assistance Centers

The County has successfully established local assistance centers in 2008 and 2017 in response to multiple wildfires. The Camp Fire was so large that FEMA offered to stand up a disaster response center and Butte County participated with local resources.

Lessons Learned and Progress Achieved Over the Years

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Based on lessons learned over the years the County has either implemented, or is in the process of implementing, a number of measures that improve the County's capabilities and preparedness for future disasters and emergencies. Provided below are many of those lessons learned and process improvements, though they may not currently be documented in formal plans.

- The Sheriff's Office and Butte County Office of Emergency Management (OEM) have collaborated to apply for a non-cellular dependent emergency notification system. The grant request is in the review process and if approved will provide funding for a tool to help notify the public of emergencies in a more expedient manner and without the dependence on cellular networks that are prone to failure during disasters. The limitation in non-cellular dependent emergency notification systems, such as sirens, is the public won't know if the warning is for a flood, fire, tornado, or other type of disaster, which can hamper their ability to determine what steps to take. Without specific information, the public will not know if certain roads are blocked, whether it is best to head to the valley or the mountains, or if finding the closest shelter in place site is better than evacuating.
- The Office of Emergency Management has a SEMS and NIMS trained team for Emergency Operations Center activation that is three to four layers deep and composed of County employees from many County departments. In the case of the Camp Fire, the County had to rely on mutual aid for staffing many positions, due to the intensity and length of the event and a need for hundreds of people to support response efforts.
- The Office of Emergency Management, in coordination with other local jurisdictions and districts, has updated the Local Hazard Mitigation Plan, which will be considered by the Board of Supervisors on November 5, 2019.
- The Department of Employment and Social Services provided shelter management training to all management/leadership staff on October 1, 2019. The Department will be providing EOC training to all leadership staff on October 23, 2019. This training

focuses on the specific roles and responsibilities of operations in the Care and Shelter Branch during an EOC activation.

- The Office of Emergency Management and the Department of Employment and Social Services will be meeting with all faith based and community based organizations who are interested in receiving shelter management training and becoming an official shelter location, beginning in December 2019. The County will develop memorandums of understanding with the organizations that meet the requirement.
- In May 2019, the Office of Emergency Management and the Department of Employment and Social Services met with a local church and developed a memorandum of understanding for sheltering. The church is in the process of reviewing the agreement.
- In July 2019, the County hired a second position for the Office of Emergency Management to assist in recovery efforts, and is in the process of adding a third position due to the workload from the Camp Fire. Most of the funding for the positions will come through reimbursement for administrative recovery functions. The additional positions will eventually free up other staff to address planning needs.
- In July of 2019, the Sheriff's Office created an emergency manager position to specifically prepare for and manage emergencies within Butte County. This position allows more time to be dedicated to addressing issues related to emergency preparedness and disasters. With the additional position, many issues have already been addressed, while others continue to be addressed. The position received training in Emergency Planning in October of 2019. This training will be used to assist the Office of Emergency Management in updating the County's Emergency Operations Plan (EOP).
- The Sheriff's Office added a distinctive Hi-Lo siren to all of the patrol cars in its fleet. This siren will only be used during evacuations to alert people as officers go door to door. The Sheriff's Office has requested other law enforcement agencies in and around Butte County to add the Hi-Lo siren to their patrol car capabilities. This will alert the public that there is an evacuation in progress in case other forms of alerting and notifying don't work. In this manner the County is coordinating with allied agencies to tailor its response to the type of disasters experienced in the north state.
- The Sheriff's Office began community outreach to educate the public about the new evacuation sirens, through press releases, the Office's website, and numerous community meetings with Neighborhood Watch groups, fire safe councils, and other community groups.
- Due to the complexity and dynamics of evacuations such that occurred during the Camp Fire, the Sheriff's office has provided all patrol sergeants with checklists to ensure they are taking into account all priorities during evacuations, as well as requesting all needed resources.

- The Sheriff's Office Alternative Custody Supervision (ACS) Program works with the Public Works Department to clear fuel loads along evacuation roadways. Public Works is inundated with requests from the public, and due to limited resources has been unable to meet the demand. With this collaborative effort, the County has been successful at clearing a significant portion of a two-lane road to a foothill community that only has one way in and out of the area. The Sheriff's Office will continue to provide this collaborative effort with Public Works to clear evacuation routes throughout the year.
- The Sheriff's Office coordinated a meeting with personnel from CalOES, the Office of Emergency Management, Butte County Public Works, Butte County Fire/CAL FIRE, CHP and State Parks to discuss potential simulated fire incidents in various locations throughout Butte County. Approximately eight different communities throughout Butte County were identified, along with the challenges that might be faced, evacuation routes and populations.
- The Sheriff's Office is working with CalOES to identify evacuation strategies that specifically target people with access and functional needs. Planning will be in coordination with Butte County Fire/CAL FIRE, medical personnel, the Office of Emergency Management, other appropriate County departments, and other organizations that serve the population. There is potential coordination with neighboring counties as well.
- When a fire starts and Butte County Fire/CAL FIRE responds, a request is now immediately made for a Sheriff's representative so that evacuation planning can begin as soon as possible. This was not the historical practice.
- The Sheriff's Office met with representatives from throughout the State and with CalOES regarding CalOES' intent to implement statewide use of common evacuation terminology. At that meeting various options were discussed for verbiage to be used by law enforcement and fire personnel to make communications more clear regarding evacuation incidents.
- The Sheriff's Office has completed its Alert and Warning Plan, as well as alert and warning templates that comply with FEMA and CalOES recommendations and limitations. On October 4, 2019 CalOES publicized its translated message template library, providing all jurisdictions with translated message templates in various languages. The Sheriff's Office has completed translated template messages in Spanish and Hmong, which are the two predominately non-English languages spoken in the County according to 2010 census data. The Sheriff's Office has added translation capabilities with its current vendor CodeRED to provide translation services in the messaging platform.
- Since the Camp Fire the Sheriff's Office has developed and implemented protocols to ensure that WEA/EAS messages are successfully delivered in circumstances when it is appropriate for those systems to be utilized. In October 2019, the Sheriff's Office

received a test account from FEMA and successfully sent a test message according to FEMA's best practices and requirements. The Sheriff's Office received a notice indicating that the test was successful.

- The Sheriff's Office amended its contract with CodeRED to provide a toll free number for the public to call to receive updated information during emergencies. Due to the character limitations in WEA and CodeRED, the information that can be sent out in alerts and warnings is limited. The toll free number will have a recorded message with additional information not available in the alerts and warnings sent out via WEA and CodeRED. The Sheriff's Office will be able to frequently update this information during emergencies to enable the public to be better informed.
- The Sheriff's Office has expanded its team of alert and warning technicians to improve the efficiency of sending out alerts and warnings, and to improve accountability for the messages the County sends out to the public. This complies with FEMA's best practices recommendation for 24/7 availability of alert and warning technicians.
- The Sheriff's Office is partnering with Facebook to help send out local emergency alerts to people who use the service and are signed up to receive the alerts. This is another platform the County is utilizing to help alert the public through multiple mediums, as recommended by FEMA and Cal OES.
- Each month Butte County meets with a countywide alert and warning group to collaborate and coordinate communications during emergencies. Representatives from various law enforcement agencies throughout the County meet, along with Butte County Fire/CAL FIRE and the FBI, to discuss alert and warning notifications and capabilities and coordination.
- The Sheriff's Office is currently developing a memorandum of agreement between agencies, to formalize how agencies will work together during emergencies to better serve and protect the public.
- The Sheriff's Office coordinated with CAL FIRE and the Cohasset Fire Safe Council to provide training to the community and did a simulated drill utilizing CodeRED notifications to the community.
- Due to the potential for losing technology infrastructure during wildfires and public safety power shutoffs, the Sheriff's Office and the Office of Emergency Management are working with community groups to establish non-cellular, non-electric dependent radio communications with those community groups most likely to be impacted by wildfires and power shutoffs. The Sheriff's Office is developing a radio plan to communicate instructions to those communities in the event of an emergency, which is another layer of messaging recommended by CalOES and FEMA.
- The Sheriff's Office is in the process of creating a Community Emergency Response Team (CERT) comprised of civilian volunteers. The team will be trained and prepared

for emergencies, and will also train the public to be better prepared for emergencies. The CERT will assist any city or county agency during special events or emergencies.

- The Sheriff's Emergency Manager has attended training related to access and functional needs populations during emergency events. This training was provided by FEMA and included people from numerous public health and social services agencies. Much of the training was related to the 2018 Camp Fire and Carr Fire.
- The Sheriff's Office has its own Incident Management Team (IMT) that follows the ICS structure. The IMT is activated during emergencies, and responds to manage incidents and ensure all aspects of public safety are considered during the emergency. This team will effectively spread the workload that was initially placed on one patrol sergeant to numerous people who will focus on their area of responsibility.
- The County continues to evaluate its response and evacuation procedures for all emergencies. As a result, there are on-going modifications to processes and procedures, such as a more coordinated partnership between the Sheriff's Office and the Emergency Operations Center Logistics Section.
- The County's Public Information Officers (PIO) from the County Administration Department, the Sheriff's Office, and the Public Health Department coordinate emergency messages with each other and release them on multiple social media sites, through the media, and on County websites. The PIOs repost messages from each other's social media sites and press releases to ensure the messages are getting to as broad an audience as possible.
- Butte County is in the process of conducting an after action report from the Camp Fire. This information will be critical to Butte County and other agencies to better prepare for future catastrophic disasters similar to the Camp Fire. Due to the devastation of the Camp Fire, and the critical needs of residents, the County was not able to conduct an after action process until ten months after the event.

This concludes the County's description of the many lessons learned and progress achieved as a result of dealing with multiple disasters. It is by no means an exhaustive list, but it demonstrates our ongoing effort to continually improve our capabilities and enhance future responses.

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM BUTTE COUNTY

To provide clarity and perspective, we are commenting on Butte's response to the audit. The numbers below correspond to the numbers we have placed in the margin of its response.

Butte's implication that FEMA's best practices are of limited value for preparing for large-scale, catastrophic wildfires or that they are less applicable to jurisdictions with limited resources, is inaccurate and misleading. As we state on page 15, FEMA has published guidance it describes as the foundation for emergency planning in the United States and that includes fundamentals of planning and developing emergency plans. Included in these practices are having specific plans for critical emergency functions and ensuring that those plans address the needs of the whole community that an agency serves, including people with access and functional needs. FEMA designed these best practices to be applicable to all-hazards, including catastrophic incidents like wildfires, and directs local jurisdictions to tailor their plans to their own communities and needs. Therefore, we did not measure Butte against any best practices that were inappropriate or inapplicable to the emergency situations it has already faced or could potentially face in the future.

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Butte claims to be implementing many of the best practices we describe in our report. As we note in Figure 4 on page 16, Butte has not implemented key best practices, including having up-to-date plans and conducting demographic assessments to determine its community's needs. Until it does so, Butte is not as prepared as it could be to protect and assist people with access and functional needs during natural disasters. We look forward to reviewing documentation of Butte's progress in implementing these best practices as it provides updates on its progress during our post-audit follow-up.

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Our report provides appropriate context and sufficient evidence to support our report's conclusions. The information that Butte provides in its response does not alter those conclusions.

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We note the unprecedented size and scope of the Camp Fire in several places in our report, the first of which occurs in the Introduction on page 12. We also acknowledge in several places that is impossible to determine whether any additional planning efforts by Butte would have changed the outcomes of the Camp Fire. Regardless, as we note on page 19, FEMA guidance states that

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inadequate plans and insufficient planning are proven contributors to failure. As we conclude on page 22, Butte's planning deficiencies likely hindered its response to the Camp Fire.

- ⑤ Butte misstates and mischaracterizes our report's conclusions regarding the effects of its planning deficiencies. We state on page 16 that because Butte did not fully implement important best practices for planning for natural disasters, its residents may be at greater risk of harm. These practices include having up-to-date plans for critical emergency functions and prearranging vital resources. Butte acknowledged some of these gaps in its planning during our audit and does so again in its response. It is because Butte has not adhered to these practices—and not because of a lack of documentation—that Butte is not aligned with the foundational planning practices encouraged by FEMA and the result is that its residents may be at greater risk of harm than they would be if it had adhered to these practices.
- ⑥ In no part of our report do we state or suggest that emergency planning is more important than emergency response. Butte ignores the importance that both FEMA and Cal OES place on emergency planning and the connection between planning and response. As we note on page 19, FEMA states that inadequate plans and insufficient planning are proven contributors to failure. Our report makes it clear that deficiencies in Butte's emergency planning caused problems during the Camp Fire, and therefore continue to threaten the effectiveness of Butte's disaster response efforts.
- ⑦ We accommodated every request that Butte made for additional time. In fact, at Butte's request we significantly rearranged our schedule for completing audit work, and delayed our first visit to Butte by seven weeks. Further, well in advance of its formal response period, we were clear in our communication with Butte about the conclusions we planned to report. We had several conversations with Butte about the audit's conclusions and a formal meeting at which it had the opportunity to read a draft of the report. We provided Butte the same amount of time we provide to all audited entities to respond to the final draft audit report and Butte never communicated a need for additional time to provide its response. We acknowledge that Butte is still recovering from the Camp Fire, but the suggestion that we were inflexible with the timing of our review is false.
- ⑧ In making this statement, Butte either misunderstands or disregards the scope of the audit that the Joint Legislative Audit Committee (Committee) requested we perform. As we describe on pages 69 and 70, the Committee asked that we evaluate the counties' processes for ensuring that individuals with access and functional needs are accounted and cared for before, during, and after a

natural disaster, in part by reviewing the extent that the counties' emergency plans incorporate best practices. As we describe throughout the report, Butte did not implement key emergency planning best practices before the Camp Fire and has not done so since. We are required by law to follow generally accepted government auditing standards, and those standards require that we examine the effects of the problems we identify in our audits. The effects of deficient emergency planning would manifest themselves most clearly in a county's response to a natural disaster. Therefore, we reviewed the extent that Butte's planning deficiencies caused problems during the Camp Fire. For instance, we describe how Butte's inadequate planning led to its inadequate alert and warning during the evacuations, which we describe beginning on page 29. We based these conclusions not on limited information as Butte asserts, but rather on sufficient and appropriate evidence, including documentation and interviews with staff in Butte who are directly responsible for emergency planning and who were involved in the response to the Camp Fire.

Consistent with its statements to us during our audit, Butte expresses an unnecessarily narrow belief that its agreements for disaster response resources must be limited to the resources available locally. As we describe on page 21, the state emergency plan says that public-private partnership agreements can provide for quick access to emergency supplies and essential services. However, as we also note on that page, Butte had not established agreements for transportation resources to assist during evacuations. Additionally, although accessible showers are an important resource for people with disabilities in emergency shelters, Butte has not prearranged for this resource, as we state on page 42, and struggled to obtain showers during the Camp Fire. Butte makes a general assertion that certain resources are not available in the county. If true, this assertion would make it even more important for Butte to prearrange agreements to obtain those resources, regardless of whether it would need to do so with vendors from outside of its immediate area. Finally, Butte's suggestion that it cannot take proactive steps to correct a shortfall of shelter supplies stands in contrast to Sonoma's approach. We note on page 45 that Sonoma has taken steps to directly purchase shelter supplies, including accessible showers.

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We are glad that Butte indicates its willingness to use a variety of available data to assess the needs in its community. However, Butte's response suggests that this would merely continue an existing practice. As we note on pages 19 through 21, Butte has not conducted adequate assessments of its community to identify those with access and functional needs, or used existing county data in the development of its emergency plans. As stated on page 19

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of the report, FEMA warns that failing to do so may lead to false planning assumptions, ineffective courses of action, and inaccurate resource calculations.

- ⑪ As we note on page 17, Butte provided this plan after we sent the draft report to Butte for its final comment, and we will review the extent to which the plan incorporates best practices and addresses access and functional needs as part of our post-audit follow-up process.
- ⑫ Because Butte included this statement in its discussion of changes it intends to make to its evacuation planning, we believe that Butte is referring to its outdated evacuation plan, not its all-hazard mitigation plan.
- ⑬ Butte's statements suggest that it does not understand the best practices related to tailoring its emergency plans to its own community. It describes its use of various sources of information available regarding people with potential access and functional needs in its community. Although in its response it calls its use of this information pre-planning, Butte is actually referring to the incident response planning that a local jurisdiction does once it is actively responding to an emergency situation. This is wholly different than the best practice of assessing community needs in advance of a disaster.

As we indicate on page 19, and as we discussed with staff at Butte several times during our audit, FEMA recommends that, prior to a disaster, local jurisdictions conduct demographic assessments of their communities to understand the needs that the people in their communities will have during an emergency, which is critical to identifying people with access and functional needs. Local jurisdictions can then use this information in the development of their emergency plans to help ensure that they can meet those needs. As it relates to evacuation planning, we state on page 39 that Butte had not conducted such assessments or used demographic information in its planning to identify the number of people who may need assistance evacuating, which would allow it to better estimate the evacuation resources it should have available.

As we further state on page 40, by not making use of existing county data when planning for emergencies, Butte is missing an opportunity to expedite evacuation assistance when natural disasters occur. Until Butte assesses the needs of its community and uses the information it obtains in the development of its emergency plans, it risks encountering the problems that FEMA warns can happen when jurisdictions do not base their emergency planning on its community's demographics—false planning assumptions, ineffective courses of action, and inaccurate resource calculations.

We are glad that Butte intends to implement our recommendation that it follow best practices related to developing agreements with transportation providers. As part of implementing this best practice, it will be important that Butte assess how many people within its jurisdiction may need evacuation assistance, as well as the transportation resources that agreements with transportation providers will make available so that it can determine whether those resources will be sufficient.

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Butte's inaccurately portrays its sheltering plan and assessments of shelter facilities. As we discuss on page 18, Butte's sheltering plan is significantly outdated. Additionally, during our audit Butte provided a list of 100 shelter sites but it had only completed assessments for three sites to determine whether they were accessible to people with disabilities, and the assessments were completed in 2007. Butte's director of employment and social services stated that Butte intends to establish agreements with more shelter locations in the next year, and will include completed access and functional needs assessments for those locations. Until it does so, Butte will remain underprepared to address access and functional needs in its emergency shelters.

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To the extent that Butte has historical data from multiple disasters regarding how many people may seek shelter, including how many may have access and functional needs, it should incorporate that into its planning as contemplated by FEMA best practices. As we describe on page 19, those best practices indicate that local jurisdictions should conduct demographic assessments to know the demographic profile of their communities and understand the type of assistance that their various populations may require during a disaster. However, as we further note on that page, Butte had not performed such assessments. Butte further indicates in its response that it intends to continue its use of a planning tool to calculate shelter estimations and resources. As we note on page 42, FEMA states that a community's demographics can have a profound effect on shelter operations. Therefore, Butte should not rely on generalized estimates when planning for resources to support the people in its community who seek shelter.

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Butte's stated plan will not address the problem it has with outdated emergency plans or our recommendation. As noted in several places in our report, Butte has not updated its emergency plans since 2011. The time since its last update significantly exceeds FEMA's recommendation to update emergency plans every two years and the five-year interval within which the State is required to update its emergency plan. As we note on page 18, FEMA states that outdated plans can cause setbacks for local jurisdictions during an emergency because of old information, ineffective procedures, incorrect role assignments, and

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outdated laws. Because of the importance of keeping these plans up-to-date and because we recognize that many interests compete for local resources, we recommend that Butte place a priority on updating its plans regularly by adopting a requirement to do so in a county ordinance. Further, Butte demonstrated that it has the ability to update its plans while also balancing other important disaster recovery activities when in October 2019, while recovering from the Camp Fire, it updated its alert and warning plan.

⑱ Butte claims to have taken various preparedness actions for which it states that it has no documentation. None of these actions would change the veracity of our findings or the conclusions that we have made, including that, as we state on page 15, Butte is not as prepared as it could be to protect its residents during future natural disasters, including people with access and functional needs, because it has not followed key practices for emergency planning.

⑲ Our conclusion that Butte has not adequately followed best practices for emergency planning is not based on assumptions, nor is it based solely on the fact that Butte does not have an updated emergency operations plan, or on Butte's lack of documentation of its response procedures and practices. Our conclusion is based on substantial evidence that Butte has not implemented best practices that FEMA identifies as important for effectively responding to disasters. Although as we discuss on page 18 that it is problematic that Butte has not updated its emergency plans for many years, it is also problematic that Butte has not adequately assessed the needs of its community to inform its emergency planning, has not prearranged key resources to protect and support people with access and functional needs during emergencies, and has not adequately involved people with access and functional needs in emergency planning. We first discuss those issues on pages 20, 21, and 23, respectively.

⑳ Butte's response lists several stakeholder entities and groups with which it states it collaborated during emergency planning. However, as we note on page 24, Butte could not provide evidence of its involvement of representatives of people with access and functional needs, including community organizations, in emergency planning. We further note on page 25 that Butte's description for how it involved those representatives falls short of best practices for involving people with access and functional needs in planning. Until it adequately involves them in emergency planning, Butte will continue to miss an opportunity to learn what individuals in its community need during natural disasters and how it can prepare to meet those needs.

Butte describes steps that it took in the development of its 2011 evacuation plan. However, as we note on page 37, that plan is significantly outdated, does not align with all-hazards evacuation planning best practices, and does not address how Butte plans to support residents with access and functional needs during an evacuation. Further, Butte asserts that part of its planning effort included collaboration with other agencies to develop evacuation zones and routes. However, those zones and routes are not mentioned in Butte's evacuation plan, which may represent yet another shortcoming of Butte's outdated plan.

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Butte misrepresents our conclusions. Our report does not say that resources are not available. Rather, we conclude that Butte has not adequately implemented best practices for ensuring the availability of critical resources during natural disasters, including supplies that are important for supporting people with access and functional needs. As we describe beginning on page 21, FEMA guidance states that during the planning process, local jurisdictions should conduct assessments of the resources that they will need during disasters and identify how they will obtain those resources, for example, by developing memoranda of understanding with suppliers. The state plan says that public-private partnership agreements can provide for quick access to emergency supplies and essential services. However, as we note on page 21, although Butte has prearranged for many shelter supplies, it has not prearranged transportation agreements for providing evacuation assistance. Similarly, as we describe on page 44, it has not prearranged to obtain accessible showers. Both of those resources are critical to support people with access and functional needs during disasters, and we describe, on pages 35 and 42, how Butte struggled to obtain those resources during the Camp Fire.

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Butte claims to have prearrangements for buses and paratransit buses for evacuations; however, it does not. As Butte acknowledges in its response on page 76, and in our report on page 38, Butte lacks agreements for transportation resources for providing evacuation assistance.

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Our report does not require clarification. In its full context it is clear in our report that Butte does not have prearranged agreements to obtain transportation resources. Further, we state clearly on page 39 that Butte has not conducted assessments of its community to determine the number of people who may need evacuation assistance. As a result, Butte cannot know whether the transportation resources it states it knows about will be sufficient to provide evacuation assistance to the people in its community who will need it during a natural disaster.

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- ②⑤ Contrary to Butte’s statement, our report makes no “assertion” about Butte’s preparation to alert and warn its residents in advance of the Camp Fire. Instead we based our conclusion that Butte was not as prepared as it could have been on the documentation we reviewed—including Butte’s outdated alert and warning plan, which makes no mention of a major federal alerting system—and the confirmed statements from responsible staff at Butte—who agreed that the county had not developed pre-scripted message templates and that doing so would have helped Butte better adhere to best practices during its response to the Camp Fire. Additionally, contrary to Butte’s stated belief, our conclusion does take into account no-notice events. The best practices we describe, including developing message templates in advance of a natural disaster, are designed to enhance a local jurisdiction’s ability to quickly send alert and warning messages during no-notice events. Further, as we note on page 19, advance planning improves a local jurisdiction’s ability to effectively manage response operations in the face of the complexity and uncertainty inherent in natural disasters. As we state on page 29, by not implementing these best practices, Butte impaired its ability to effectively warn its residents of the impending danger from the Camp Fire.
- ②⑥ Butte’s statement is inaccurate. On page 29 we note that Butte asserted that it used multiple methods for alerting and warning people during the Camp Fire, and on page 30 we acknowledge that Butte used methods such as email and social media. However, we also note that none of those methods have the ability to reach as many people as quickly as WEA messages, which are designed to reach all cell phones in an evacuation area.
- ②⑦ Butte did not send WEA messages during the Camp Fire, which we note on page 29. As we describe on page 31, Butte asserted that it attempted to send a WEA message, but the message failed to send through its software program. However, as we further state on page 31, Butte did not follow FEMA guidance to test its software to ensure that it was functional before a natural disaster. The WEA messages that Butte refers to that it subsequently sent were alert and warning messages to warn residents of flooding that occurred after the Camp Fire.
- ②⑧ Butte’s incorrectly asserts that our report does not acknowledge that it initiated messages to landline phones. On page 29 we state that Butte issued emergency messages through its local emergency alert and warning systems, which uses contact information, such as cell phone numbers, that residents provide, as well as landline contact information that the counties purchase from service providers. We further note that only using this system, and not issuing a WEA message, was inherently problematic given the public’s declining use of landlines and the small percentage of people who sign up for cell phone alerts.

We do not criticize Butte for things that occurred during the Camp Fire that were outside of its control. On page 29 we acknowledge that, because of infrastructure challenges and the limitations of any given alerting method, it is unlikely that Butte could have alerted every single person within the evacuation zones. However, Butte's response directs focus away from problems that it could have prevented through better preparation. As we describe beginning on page 28, Butte did not maintain an up-to-date alert and warning plan, did not follow advice from FEMA to test its WEA message capabilities in advance of a disaster, had not pre-scripted messages to ensure they contained the advised information, and had not planned to issue messages in languages other than English.

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As a result of these planning deficiencies, Butte was less prepared during the Camp Fire to issue WEA messages, issue messages that contained all advised information, and issue messages in languages other than English. Finally, we disagree with Butte's assertion that best practices would not strengthen response to catastrophic wildfires. The preparation steps we describe in our report would better prepare a county for any disaster, regardless of size and scope. Therefore, it is likely that they would have yielded additional benefit during the Camp Fire. Also, Butte's own adoption, following the Camp Fire, of an updated alert and warning plan and pre-scripted message templates in English and other languages seems to indicate it agrees these are preparedness steps that will enhance its disaster response.

The challenges that Butte describes related to developing alert and warning messages that are limited to 90 characters underscore the importance of developing alert and warning message templates in advance of a disaster. As we indicate on page 32, Butte had not done so before the Camp Fire. Butte appears to recognize the value of preplanning to address the character limit because the message templates that Butte developed during our audit in English, Spanish, and Hmong, which we discuss on page 34 of our report, contain templates for 90 character messages.

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Butte indicates that it did not send alert and warning messages in languages other than English because it did not have translation capabilities immediately available during the Camp Fire. However, as we discuss on pages 32 and 34, Butte had not followed best practices stating that local jurisdictions should develop pre-translated message templates. If it had completed this planning step in advance of the Camp Fire, Butte would have been better positioned to send messages in languages other than English.

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Butte's suggestion that including the source of its alert and warning messages was not necessary during the Camp Fire is contrary to best practices, which we describe on page 32 and which state that

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the response that individuals have to an emergency alert depends in part on the level of trust that they have in the source. Nevertheless, during our audit, Butte developed alert and warning message templates that contain the source of the messages, which indicates that Butte believes there is value to including that information in its emergency communications.

- ③③ Our report does not state that the county's Special Needs Awareness Program (SNAP) registry only contains IHSS clients. On page 39 we state that Butte's in-home support services (IHSS) agency maintains a list of people who receive IHSS and will require assistance during an evacuation, and that Butte also enables residents with access and functional needs who do not receive IHSS to provide their contact information to the county and indicate that they will need evacuation assistance. It enables residents to do so through the county's SNAP program. We further note on page 39 that, contrary to best practices, Butte did not use this information in the development of its emergency plans.
- ③④ Butte indicates that it has taken the actions it lists here, though it may lack documentation to support them. Regardless, none of the claims that Butte makes in this list change any of the conclusions that we make in our report. Additionally, many of the actions that Butte describes are actions that it claims to have taken following the Camp Fire or will take in the future. We look forward to reviewing how Butte incorporates these actions, and the best practices from FEMA and Cal OES, into its updated plans during our post-audit follow-up process.

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November 12, 2019

Ms. Elaine M. Howle, CPA*
California State Auditor
621 Capitol Mall
Suite 1200
Sacramento, California 95814

Re: 2019-103 County Emergency Plans-Evacuation of Residents with Access and Functional Needs Audit

Dear Ms. Howle,

Please find enclosed the County of Sonoma's response to the above referenced audit. As you are no doubt aware, Sonoma County has been heavily impacted by various natural disasters in recent years. As such, the County very much appreciates the interest of the Joint Legislative Audit Committee in requesting this audit, and the work performed by the audit team regarding this very important subject matter. The County of Sonoma looks forward to working collaboratively with the California State Legislature, the Governor's Office of Emergency Services, and our residents and local stakeholders to strengthen the emergency planning, preparedness and response throughout the State of California for all its residents and visitors.

Sincerely,

Sheryl Bratton,
County Administrator
County of Sonoma

* California State Auditor's comments begin on page 109.

**County of Sonoma Response to 2019-103 County Emergency Plans-Evacuation of
Residents with Access and Functional Needs Audit**

The County of Sonoma appreciates the opportunity to respond to the *2019-103 County Emergency Plans-Evacuation of Residents with Access and Functional Needs Audit*, performed by the California State Auditor's Office, at the request of the California Joint Legislative Audit Committee. Meeting the disaster response needs of the most vulnerable in our community must be one of the highest priorities of state and local emergency service planners and this audit shines welcome light on the issue. In particular, the report finds that there are not any state regulatory guidelines or statutes to guide a uniform approach. Further, there are no State resources dedicated to providing effective leadership serving this growing population of Californian's with access or other functional needs (AFN) barriers to effective disaster response. The County of Sonoma agrees that more uniform guidance and support should be provided to county agencies who are the primary jurisdictions responsible for emergency planning, preparedness and response.

In the absence of specific legal requirements, the audit researched relevant best practices as benchmarks that might be applicable to specific situations depending on the factual circumstances. We agree that if the best practices are worthy of statewide applications, it would be useful for the State to provide uniform guidance. In Sonoma County, important lessons were learned from responding to the 2017 Sonoma Complex firestorm that erupted late at night on October 8, 2017, and traveled 11 miles in 4 hours, quickly consuming over 5,000 homes and covering more than 170 square miles. Many of these lessons and best practices were applied in the recent Kincade Fire, where despite being hampered by successive PG&E power shutoffs that degraded communication capacity, the County successfully implemented the biggest evacuation and repopulation in Northern California history with a particular focus on AFN populations.

① The Kincade Fire, which burned 77,758 acres, which was larger than any single fire during the Sonoma Complex Fires, was fully contained on November 6, 2019. The Kincade Fire emergency response orchestrated the evacuation and repopulation of almost 200,000 residents. This successful evacuation was responsible, in part, for no loss of life during the disaster.

② Sonoma County is proud of its efforts to meet the needs of our AFN population during the recent disaster, which showed implementation of applicable best practices and lessons learned. As part of that effort, the County also sheltered approximately 3,400 residents, with a high percentage having access or functional needs. Persons coming to the shelter were screened by the Human Services Department Functional Assessment Service Teams (FAST), who assessed individuals to ensure their special needs were addressed. In addition, the County assisted with the evacuations of two hospitals and at least four residential care facilities. Many of these elderly care facility residents were accommodated at the County evacuation shelters.

③ In addition, both before and during the Kincade Fire, Sonoma County was subject to repeat and extended PG&E power shutoff events involving over 250,000 residents, in which special outreach was conducted to AFN populations. The County has 6,232 In-Home Supportive Service (IHSS) clients who represent many of the most vulnerable members of the community. Prior to the power shutoffs and fire, the County Human Services Department worked with the IHSS clients and caretakers to develop emergency response individualized preparedness plans. During the

emergencies, social workers made individual contacts to 2,748 clients identified as Critical, Urgent and Moderate need. These contacts helped ensure that clients in the evacuation area had means to leave and that individuals had plans in place to cope with the power shutoffs. In cases where the clients were in distress, social workers were dispatched to the home to provide aid. In addition, outreach was also made to 463 PG&E medical baseline customers who the utility was unable to reach to provide similar support as well as to federal Department of Health and Human Services emPower clients.

Examples of actions taken as a result of this outreach included a person from the PG&E Medical Baseline list, who the utility did not contact, who had energy dependence regarding oxygen needs and was in distress. County social workers contacted a local medical supplier for the individual and arranged to have replacement tanks delivered. A second example was a senior citizen who was on both the medical baseline and IHSS list and was a breast cancer survivor who used a nebulizer and relied on a CPAP machine at night. She reported not having enough food and couldn't get her car out of the garage due to having an electric garage opener. The Human Services Department Functional Assessment Service Team (FAST) member coordinated with the Disability Services and Legal Center (DSLCL) to get the individual a backup battery, deliver food and water, and unlatch their garage door in the event they needed to evacuate their home.

The Kincadee emergency response efforts have received praise by both Cal Fire and Cal OES. These vastly different outcomes in the two firestorm events are not only attributable to the brave and heroic firefighters who battled the fire but also to the efforts by Sonoma County and its residents to be better prepared to respond to a natural disaster. We know each event is different and brings its own lessons and best practices that can be incorporated into future planning.

The successful response to the Kincadee Fire was the result of intensive efforts to improve readiness. Before October 2017, the County of Sonoma was prepared to respond to natural disasters, likely better than most. Since October 2017, the most significant thing learned from the Sonoma Complex Fires is that we, local governments and residents, can never be prepared enough. Based on the experiences of the Sonoma Complex Fires and the 2019 Winter Storms and Flooding, County staff and allied stakeholders have worked tirelessly to increase the capacity of our residents and communities to respond to future fires and other disasters. In the first year following the fires, most County efforts focused on short-term recovery activities and assessing the response. The second year was characterized by a shift to long-term recovery activities as well as implementing changes in order to be better prepared for future disasters. ④

An important product of these efforts was that the Sonoma County Board of Supervisors adopted Sonoma County Recovery and Resilience Framework, as well as a specific program to test and improve the County's Alert and Warning program and Emergency Operations Center (EOC) functions. For example, in the recent Kincadee Fire, the successful evacuation of over 190,000 people was accomplished by coordinated alert and warning messages sent in both English and Spanish through the sending of 15 Wireless Emergency Alerts, 26 SoCo Alerts, the first ever use of the NOAA Weather radio system west of the Rocky Mountains, Nixle messages, and the use of Hi/Lo warning sirens, all of which directed recipients to the real time posting of evacuation zones on the County's Emergency website, which received over 2 million views. The response to the Kincadee Fire was not reviewed in the audit. ②

While identifying and overcoming limitations in alert and warning systems has been a major area of focus, other important improvements have been implemented since the October 2017 Sonoma Complex Fires to its emergency planning, preparedness and response efforts. These actions include:

- ⑤

 - Established an innovative comprehensive Alert and Warning Program by:
 - Establishing a new Alert & Warning Program, including the use of the Wireless Emergency Alert (WEA) system.
 - Hiring two dedicated staff for managing the program and issuing warnings – the highest level per capita staffing in the state.
 - Maximizing system capabilities by expanding access and streamlining activation procedures.
 - Integrating and implementing concurrent Spanish messaging.
 - Conducting real-world warning systems exercises in 2018 & 2019 including the first use of WEA live warning codes in the western United States.
 - Expanding public outreach and education.
 - Expanded and trained additional staff as system activators.
 - Establishing a standing Alert & Warning Committee consisting of representatives from local government, public safety, and community groups countywide.
 - Implemented new systems: Hi/Lo sirens on Sheriff’s patrol cars to assist with evacuations and the NOAA Weather Radio for issuing non-weather emergency alerts.
 - Contributed to State and Federal warning policies and guidance.
 - Increasing SoCoAlert subscribers by 200%.
 - Worked with local communities to identify hazards, risks, and mitigation strategies, including evacuation routes.
- ⑥

 - Developed a community evacuation planning and exercise program and conducted two full-scale community evacuation drills in partnership with local neighborhood groups.
 - Supported the development of over a dozen local Communities Organized to Prepare for Emergencies (COPE) groups that are meeting monthly to develop and enhance their individual and neighborhood disaster response capabilities.
 - Significantly expanded and enhanced the 2-1-1 System and emergency response capabilities.
 - Facilitated construction hardening techniques appropriate for wildfire urban interfaces and seismic retrofits for rebuilding and for existing homes through education and grant programs.
 - Worked with private utility providers on solutions related to hardening infrastructure and on coping with destroyed utilities in a disaster, including undergrounding where appropriate and necessary.
 - Helped property owners navigate vegetation management opportunities through partnerships with Fire Safe Sonoma and similar programs.
 - Continued to advocate for substantive changes to insurance regulations.
 - Implemented Community Awareness strategies, such as recent mailers on Watershed Protection and Defensible Space.
 - Developed an enhanced vegetation management program by:

- Authorized \$900,000 for the Expanded Fuels Reduction and Landscape Resiliency Campaign;
- Provided \$375,000-400,000 for proactive vegetation management inspections for Spring 2020 into Fall 2020;
- Provided \$80,000-100,000 to conduct abatement for non-compliance for Spring 2020 into Fall 2020;
- Hired a Registered Professional Forester to support permitting and compliance requirements;
- In conjunction with Fire Safe Sonoma, finalized projects, key deliverables and metrics based on the County’s proposed investment for community education and engagement;
- Held internal meetings with Sonoma County Departments and other agencies to develop & coordinate systems to ensure collaboration between departments regarding fuel projects;
- Full program funding to be completed by end of January 2020; and
- Inspected 2,739 parcels.
- Implemented a dynamic-scaling website platform (SoCoEmergency.org) to provide emergency preparedness and real-time incident information to residents and visitors in both English and Spanish.
- Partnered with the Sonoma County Water Agency and PG&E to install nine Fire Watch cameras throughout the County.
- Allocated \$1M over two years to support increased county-wide staffing by local fire agencies during periods of increased fire danger including all Red Flag Warnings.
- Expanded a Staff Development program to better train County employees in disaster response.
- Developed a comprehensive emergency response plan for Electrical System Shutoffs – the first in the state - and supported increased planning coordination for jurisdictions across the state.
- Developed the following plans:
 - County Continuity of Operations Plan (COOP);
 - Human Resources: Learning Management System (LMS);
 - Staff Wellness Benefits for Disaster Preparedness;
 - Functional Assessment Support Teams (FAST);
 - Fairgrounds animal evacuation and supplies; and
 - County Board of Supervisor’s Guide to Emergency Operations.
- Applied for the following grants to enhance emergency planning, preparedness and response:
 - Hazard Mitigation Grant Program (HMGP).
 - Pre-Disaster Hazard Mitigation Grant Program (PDM).
 - Community Development Block Grant –Disaster Recovery (CDGB-DR) Unmet Needs.

The list above is a sample of the accomplishments the County of Sonoma has achieved in improving its emergency response capabilities in the two years since the Sonoma Complex Fires. During the recent October 2019 Kincadee Wildfire – the largest in the County’s history – and the

concurrent PG&E power shutoff to 260,000 residents, the County demonstrated significant capabilities including:

- Successful use of multiple Alert & Warning systems to issue dozens of emergency warnings in both English and Spanish. This included the Wireless Emergency Alert (WEA) system (15 activations), Emergency Alerts System (EAS), SoCoAlert subscriber system (26 activations), law enforcement patrol car Hi/Lo sirens and Nixle as well as the NOAA Weather Radio system – the first such use for a non-weather emergency in the western United States.
- The successful evacuation of over 190,000 residents – the largest single-county evacuation in recent Northern California history.
- Established and supported nine shelters for over 3,400 individuals as well as pets and livestock.
- Staff made provisions for contacting and preparing to evacuate hundreds of individuals without housing from areas threatened by the fire.
- Staff supported evacuation and resident care of four care and shelter facilities as well as two major hospitals.
- The real-time incident status map addressed both the fire and the PG&E power shutoff hazards and was viewed more than 9 million times.
- All County communications for SoCoAlert, Wireless Emergency Alerts, EAS, SoCoEmergency.org, and social media were produced in English and Spanish, with Spanish translation provided by bilingual Sonoma County employees.
- As stated above, staff contacted thousands of In-Home Supportive Services clients, PG&E Medical Baseline customers and persons on the Medicaid Empower lists to confirm their plans for the power shutoff and Kincade Fire evacuations and to determine if evacuation assistance or other assistance was needed.
- Emergency information on SoCoEmergency.org was displayed side-by-side in Spanish and English.
 - Through the height of the emergency, SoCoEmergency.org was viewed 2 million times. Of those 2 million views, 80,500 thousand views were of Spanish content. The views were generated by 519,000 unique users, 18,000 of which were Spanish speaking. By way of context, Sonoma County’s population is 504,000.
- During emergency response, the County shared bilingual information on Facebook, Twitter, and Nextdoor. Facebook was updated on average 1.2 times per hour, and had 315,000 engagements, while Twitter was updated 1.4 times per hour and saw 2 million impressions.
- 2-1-1 provided bilingual assistance via phone calls and text messages, with 4,540 contacts.

⑦ As stated above, the County recognizes that while much has been accomplished, more must be done. We look forward to reviewing the full audit report, including recommendations for guidance, assistance, establishment of state standards, and the provision of funding and other resources to assist California counties with providing the best emergency response services available. The County of Sonoma stands ready to be partners with the Legislature, Cal OES, Cal

Fire, other counties and local governments, stakeholders, and most importantly, the residents of Sonoma County, to improve local emergency planning, preparedness and response.

Sonoma County's Response to the Audit Report's Recommendations

Recommendation No. 1:

To best prepare and care for people with access and functional needs, Sonoma should revise its emergency plans by following the best practices identified in the report. Sonoma should begin implementing these practices as soon as possible. By no later than March 2020, Sonoma should develop a schedule for completing updates to its emergency plans.

County Response to Recommendation No. 1:

Sonoma County will implement the recommendation to update emergency plans by March 2020 and looks forward to including additional statewide adopted standards in serving AFN and other vulnerable populations.

Recommendation No. 2:

To ensure that it maintains updated emergency plans that are consistent with current best practices, Sonoma should adopt ordinances establishing requirements for the frequency with which it must update its emergency plans and should set that frequency at no greater than five (5) years.

County Response to Recommendation No. 2:

This recommendation will be implemented by March 2020.

Recommendation No. 3:

To ensure that its emergency planning efforts more fully account for people with access and functional needs in the future, Sonoma should adopt ordinances that require its county emergency manager to do the following during each update to its emergency plans:

- When planning to protect people with access and functional needs, adhere to the best practices and guidance that FEMA, Cal OES and other relevant authorities have issued.
- Report publicly to the Board of Supervisors during emergency planning about the steps they have taken to address access and functional needs.
- Consult periodically with a committee of community groups that represent people with a variety of access and functional needs. Further, Sonoma should require that representatives of the community groups committee present to the Board of Supervisors their review of the adequacy of the emergency plans.

County Response to Recommendation No. 3:

The County's response to the Kincade Fire demonstrates that much of the substance of this recommendation has already been implemented. The County of Sonoma does intend to refine its policies to include adoption of applicable guidance and FEMA, Cal OES and other relevant best

practices. The County looks forward to incorporating statewide standards into its updated emergency plans and working with the State as a partner in developing these important guidelines.

The County of Sonoma will adopt a policy that the Director of Emergency Management report publicly to the Board of Supervisors during emergency planning about the steps taken to address access and functional needs.

The County of Sonoma does intend to continue to implement its policy that the County will consult periodically with a committee of community groups that represent people with a variety of access and functional needs and to request that representatives of the community groups committee present to the Board of Supervisors their review of the adequacy of the emergency plans.

The County of Sonoma does not agree with the recommended process for implementing the recommendations. Best practices, by definition, are reliant upon the specific facts and circumstances of a situation and formalizing these steps into local law does not create the type of flexibility needed in responding or planning for a disaster response. Instead, the Board of Supervisors will adopt policies that implement the above which will provide a better mechanism to improve and expand upon them as state standards and best practices change, rather than more formalized and time intensive amendments to local ordinances.

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The County intends to adopt the policies stated above by March 2020.

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM SONOMA COUNTY

To provide clarity and perspective, we are commenting on Sonoma's response to the audit. The numbers below correspond to the numbers we have placed in the margin of its response.

Sonoma's suggestion that the best practices we applied as criteria in our review might only be applicable to specific emergency situations is inaccurate. As we state on page 15, FEMA and other emergency management authorities have published best practices that they advise emergency management agencies to follow so that they develop the best possible emergency plans. Included in these best practices are having specific plans for critical emergency functions and ensuring that those plans address the needs of the whole community, including people with access and functional needs. FEMA and the other organizations designed these best practices to be applicable to all hazards, including catastrophic incidents like wildfires, and directs local jurisdictions to tailor their plans to their own communities and needs. Therefore, we did not measure Sonoma against any best practices that were inappropriate or inapplicable to the emergency situations it has already faced or could potentially face in the future.

①

Sonoma describes its response to the Kincade Fire, which we did not review because it occurred while we were finalizing our audit report for publication. Accordingly, we have no assessment on the degree to which Sonoma's response to that disaster was adequate or influenced by planning steps it had taken in advance of the fire.

②

Sonoma appears to point to its response to the Kincade Fire as evidence that it has addressed best practices for planning and preparedness. As we state on pages 15 and 16, FEMA guidance directs local jurisdictions to develop plans for alert and warning, evacuation, and sheltering, all of which should contain strategies for how the jurisdiction will assist people with access and functional needs. However, as we state on page 16, we found that Sonoma does not have these plans. Therefore, Sonoma's asserted success during the Kincade Fire does not modify our conclusion that Sonoma has not followed best practices and done all it can to prepare to support people with access and functional needs. Additionally, as Sonoma indicates in its response on page 101, it should ensure that it develops plans informed by lessons learned from the disasters it has experienced to enable it to be better prepared to deal with future disasters.

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- ④ Despite its suggestion to the contrary, Sonoma was not adequately prepared to respond to natural disasters before the Sonoma Complex Fires in October 2017. Sonoma's response is contradictory to the after-action report it published after the Sonoma Complex Fires, which we describe on page 37. The after-action report notes that the county had experienced a large number of natural disasters before the 2017 fires and that much of Sonoma's preparedness efforts had been designed to be prepared for similarly sized disasters. Sonoma's report concluded that these past experiences were insufficient in preparing the county for the 2017 fires, which the report states was the most significant disaster in living memory in Sonoma. Further, Sonoma's response lists several improvements to its emergency planning and response capabilities that the county undertook after the Sonoma Complex Fires, thereby acknowledging improvements were needed. We look forward to reviewing its progress in addressing emergency planning best practices during our post-audit follow-up process.
- ⑤ Sonoma lists actions it has taken to improve its alert and warning program since the Sonoma Complex Fires. However, even though Sonoma developed a draft alert and warning plan in August 2018, it still has not adopted a finalized alert and warning plan. Further, as we describe on page 23, best practices from FEMA and Cal OES suggest that emergency management agencies should involve individuals with a variety of access and functional needs and local community organizations in all aspects of the emergency planning process because those individuals understand what they will need during disasters. However, as we indicate on page 26, Sonoma has not done so when developing its draft alert and warning plan. In its current form, Sonoma's draft alert and warning does not include strategies for how it will reach its residents who are deaf or hard of hearing during an emergency. Therefore, until it includes individuals with access and functional needs in its planning process, Sonoma risks overlooking the planning gaps that exist related to warning its whole community.
- ⑥ We acknowledge on page 37 that Sonoma is in the process of developing additional evacuation plans. However, the FEMA guidance we describe on page 36 states that counties should develop all-hazard evacuation plans that broadly apply to a wide range of emergencies, including different types of natural disasters, and should include provisions for evacuating individuals with access and functional needs. As we discuss on page 37, Sonoma did not have an all-hazard evacuation plan and its hazard-specific plans did not contain strategies for how the county planned to address residents' access and functional needs during evacuations. To better ensure that it has considered evacuation needs for the whole community and captured the strategies to accommodate these

needs in an all-hazard evacuation plan, Sonoma will need to include representatives of people with access and functional needs in its planning efforts.

Consistent with the confidentiality restrictions of an ongoing audit that state law mandates, we did not share our findings or conclusions about other entities we reviewed during the course of our audit with Sonoma. Therefore, Sonoma's response includes its assumptions about the results of the rest of our review.

Contrary to Sonoma's assumption, our report does not contain a recommendation to fund counties so they can implement best practices from FEMA and Cal OES. Specific to Sonoma, there are two key reasons we do not make such a recommendation. First, as we describe on page 22, the director of emergency management could not provide a formal estimate for how much it would cost the county to implement the best practices. Second, as we explain on pages 21 and 22, Sonoma developed and approved a recovery and resiliency framework, which includes actions that overlap with some of the best practices that we reviewed and describe in our report. That framework indicates Sonoma has already planned to incur many of the costs associated with emergency planning best practices, making a recommendation for State funding unnecessary.

Our recommendation that Sonoma adopt county ordinances requiring it to implement best practices when developing emergency plans does not create inflexibility, as Sonoma suggests. We did not recommend that Sonoma codify the specific best practice language we include in Figure 11 on page 50. Instead, we recommend that Sonoma adopt a broad requirement that it follow best practices when planning for emergencies. We specifically recommended Sonoma use a local ordinance because of the importance of these practices and the results of our review which show that Sonoma has not historically followed these practices. Although we acknowledge that Sonoma plans to commit to these actions through a policy, county ordinances are a stronger and more appropriate commitment to the best possible emergency planning because it makes that commitment a legal requirement.

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October 30, 2019

Ms. Elaine M. Howle*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Howle,

The Ventura County Sheriff's Office of Emergency Services, Ventura County Fire Protection District, Human Services Agency, Public Health Department, Emergency Medical Services Agency and County Executive Office appreciate the State Auditor's review of the County's emergency plans related to the safe and efficient evacuation of residents with disability, access and functional needs (DAFN). However, we feel that the report does not adequately reflect many of the proactive actions and steps we have taken to prepare and respond to unprecedented and significant disasters, as well as the overwhelmingly successful outcomes achieved. Specifically, during the Thomas, Hill, and Woolsey Fires, the safe and successful evacuation of nearly 200,000 individuals, sheltering of hundreds from our communities, and, no fatalities attributable to potential access and functional need planning gaps, as noted on page 17 of the draft audit report.

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② ③

Still, we appreciate the work performed by the California State Auditor's Office in preparing this report and welcome the opportunity to further enhance our planning and response efforts to best meet the needs of all members in the communities we serve. We acknowledge that the County should involve the DAFN population more in our emergency planning efforts, and, though we believe a nimble, flexible evacuation response has proven more effective, the County should have a written plan that describes this process and, as was previously acknowledged and addressed during the Thomas Fire, our emergency website in Spanish should have been executed with live translation (instead of Google Translate) and VC Alerts should have been sent in Spanish from the beginning.

The State Auditor's Office Report (Emergency Planning 2019-103) underscores the importance of planning and preparing to meet the needs of some of the most vulnerable in our communities and we share in this understanding, as well as the goal of improving efforts in this area. In fact, the culture of continuous process and service improvement that is a core value for us in Ventura County has resulted in some of the best possible outcomes in responding to the recent disasters we have faced. The Thomas Fire in December 2017, which was the largest wildfire in Ventura County and California history at the time, resulted in the evacuation of nearly 100,000 members of our communities with no loss of life associated with disability, access and functional needs planning efforts.

②

In the following response, we first provide some background with respect to the disasters analyzed as part of the audit, as well as the results of our planning and response efforts for the report. Additionally, we share our conclusions with recommendations contained in the report and highlight efforts already underway or completed to improve upon the DAFN components of our planning and response efforts.

* California State Auditor's comments begin on page 127.

Ventura County Response to California State Audit Report 2019-103 Emergency Planning

④ The Thomas Fire, Borderline, Hill and Woolsey Disasters

The Thomas Fire occurred on December 4, 2017. This fire was not a normal fire, nor was it a normal disaster; instead it was unlike anything anyone had ever seen in the history of the County. As a result of seven years of drought, vegetation in the hills surrounding Ventura County was exceptionally dry and had the lowest live fuel moistures that could be recalled. The winds that materialized were beyond significant and the relative humidity was in the single digits.

A few days prior to the fire, a strong Santa Ana weather pattern was beginning to form, and County emergency service providers were paying close attention. On December 2, 2017, staffing augmentations were identified for December 3-5 in anticipation of the increased risk. Ventura County Fire Department staffing was augmented, or as Cal OES now refers to it, prepositioned, on December 3 at a moderate level, then on December 4 at a very high level. (The prepositioned staffing on December 4 before the Thomas Fire started was 87% higher than regular daily staffing.) Not only were more emergency apparatus staffed, our preparation also included additional dispatchers for the communications center. A fire department conference call was held on December 3 to coordinate for the red flag wind event over the next 24 hours. On December 4 the Ventura County Sheriff's Office of Emergency Services (OES) coordinated an Operational Area conference call to discuss the elevated fire weather and countywide preparedness.

When the Thomas Fire started the evening of December 4, the County was well prepared. The speed at which the fire moved and progressed had never been seen before. Even if the fire department had engines in close proximity to the ignition point of the fire, it is highly unlikely that the fire could have been contained, as its rapid spread was almost instantaneous. Emergency response to the fire was significant and robust. Within the first few hours, fire ground commanders had placed orders for an additional 70 strike teams (350 engines staffed with over 1,500 firefighters). The County quickly recognized that the fire was moving so rapidly that there was not time to wait for the statewide ordering system to fill orders for fire engines. Accordingly, the fire chief and the incident commander both made phone calls to fire chiefs from neighboring agencies outside of the County to send their engines, outside of the normal ordering process. After many years of dealing with the failings of the statewide ordering system, which would theoretically be considered a best practice ordering system, the fire chief gave direction to bypass the system so that Ventura County could have resources on scene more quickly. Thanks to quick decision-making and response from our neighbors, this effort was highly effective and has been repeated many times since.

② Additionally, as a result of highly competent fire ground commanders anticipating the fire behavior and its likely path, proper evacuation decisions were made. There was a highly coordinated and seamless evacuation effort between Ventura County Fire Department, Ventura County Sheriff and Ventura County OES all working together at the command post. This expedient, purposeful and well-coordinated evacuation effort resulted in an outcome of zero fatalities that could be attributed to evacuation
⑤ planning or a lack thereof. It is difficult to develop an evacuation plan that addresses all evacuation scenarios; however, the agile process that the County followed allowed us to successfully navigate this incredibly dynamic and fast-moving fire. In our collective memories, we cannot recall any time when fire engines had to focus their efforts on actively evacuating civilians instead of protecting homes from the

Ventura County Response to California State Audit Report 2019-103 Emergency Planning

fire. The primary point being, the Thomas Fire was not an ordinary fire that, at the time, could have been predicted, anticipated or prepared for in the way that hindsight prepares us for responding to an emergent incident after the fact.

Ventura County's proactive approach to these emergency incidents also resulted in a request to FEMA in the form of a Fire Management Assistance Grant (FMAG) being applied for within the first few hours of the fire. This request was coordinated with the Governor's Office of Emergency Services.

As a result of the successes with the Thomas Fire, the Ventura County Fire Chief was invited to Sacramento to testify on two occasions regarding the County's best practices. We highlighted the repositioning of resources in advance of the start of the fire and the fact that it saved lives. We also highlighted the fact that, by going around the normal ordering process, we were able to get resources into the City of Ventura much more quickly and, as a result, saved homes and likely saved lives. At the time, this was not done in other fire responses throughout the state.

The Chief's testimony and significant efforts by the California fire service led to support from the Legislature for a one-time expenditure of \$25 million to upgrade technology infrastructure and revamp the statewide ordering system. Additionally, the Legislature allocated one-time funds in the amount of \$25 million from the Greenhouse Gas Reduction Fund (GGRF) so that all local government agencies could reposition resources as Ventura County did. Governor Newsom recognized the value of repositioning resources and has now made the \$25 million repositioning funds a permanent and ongoing part of the state budget. This new program is administered by Cal OES.

Within just eleven short months, Ventura County faced three new catastrophes that would further tested our emergency planning and response efforts and once again demonstrated the extraordinary preparedness of the County, our local government partners, community-based organizations and the remarkable members of the communities of Ventura County. On November 7, 2018, a mass shooter tragically took the lives of 12 individuals at the Borderline Bar and Grill in Thousand Oaks, California and injured nearly a dozen others. Among the victims were Ventura County Sheriff Sergeant Ron Helus who entered the facility to stop the attacker and was fatally wounded during his heroic response. Immediately upon the heels of this tragedy, in less than 24 hours, on November 8, a fast-moving wildfire started in Hill Canyon east of the City of Camarillo and was being driven to the west by the strong winds. The Hill Fire reached Highway 101 in less than 15 minutes, jumped the freeway and briefly threatened the community of Camarillo Springs before burning up and over Conejo Mountain and into the community of Newbury Park. It destroyed five structures there and was eventually contained at about 4,500 acres. But the Hill Fire was just the start.

About 20 minutes after the start of the Hill Fire, at 2:30 p.m., another fire was reported near Woolsey Canyon Road in Simi Valley. The fire quickly became a threat to life and property as it raced towards the City of Thousand Oaks. Evacuations were ordered in the community of Oak Park and, soon after, in Thousand Oaks, then all the way to the Los Angeles County line.

The fire jumped Highway 101, burning into Los Angeles County, triggering more evacuations as it moved toward the coast. Homes were threatened in the cities and communities of Westlake Village, Agoura Hills, Calabasas, Hidden Hills, Bell Canyon and Malibu, as well as homes in the canyons between Highway 101 and the Pacific Coast Highway. More than 90,000 people were under evacuation orders in Ventura County alone and tens of thousands of homes were threatened.

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The President of the United States and the Governor of California eventually toured the fire area. Emergency declarations by both, a local emergency declaration by the Sheriff and a Public Health Emergency declaration allowed the recovery effort in Ventura County to begin almost immediately. Emergency resources continued to pour into Ventura and Los Angeles counties. The response included 688 fire engines, 41 aircraft (helicopter and fixed-wing), 82 hand crews and 24 bulldozers.

At the peak of the Woolsey Fire, more than 5,000 emergency personnel were assigned to the incident. The fire would consume 96,949 acres – 152 square miles - an area larger than the entire cities of Detroit or Philadelphia. It destroyed 1,643 structures (185 homes in Ventura County) and damaged another 364 (115 in Ventura County). Animal Services sheltered 356 animals including horses, dogs, cats, chickens, rabbits and even three alpacas. Almost 20,000 hotline calls were answered by the Office of Emergency Services. The OES also issued 40 VC Alerts in English and Spanish, three Wireless Emergency Alerts and three Emergency Alert System Messages in addition to door to door, social media, website, and broadcast alert messages.

Ventura County's emergency information website – www.vcemergency.com – had more than two million unique page views during the fires. The site listed current evacuation orders, fire updates, and road and school closures all in both English and Spanish. At one point, both Highway 101 and the Pacific Coast Highway (Highway 1) were closed to civilian traffic.

Despite the unprecedented significance of the Thomas, Hill and Woolsey Fires, Ventura County successfully evacuated over 200,000 people, sheltered hundreds of displaced individuals and worked quickly to connect those impacted with key resources at local assistance centers. Across the Thomas, Hill and Woolsey Fires, there were four civilian casualties, none of which were directly related to emergency planning and response associated with individuals having disability, access and functional needs: two that occurred during debris removal and infrastructure repair activities in the weeks following the fires and two that occurred during private civilian evacuations..

②⑥

Considering the magnitude and scale of these events, no significant findings related to the County's response or management of these extraordinary incidents have been identified, following expansive after-action review processes with the exception of language translation and other items noted in this response. Additionally, Ventura County is widely recognized as a County of "best practice" by its peers, having received accolades from response partners from across California for our response to the Thomas Fire.

Even with such demonstrated and proven success using current methodologies to respond and manage natural disasters, the County of Ventura takes pride in being a county of continuous improvement. Following any incident, there are always new lessons learned and opportunities to strengthen existing strategies. Ventura County is quick to recognize these lessons learned and continually strives to implement change for the betterment of the communities we serve. In the following segments, arranged in the order of the key areas of focus of the State Auditor's Report, we provide feedback concerning the recommendations contained in the report and highlight efforts already taken to improve upon the DAFN components of our planning and response efforts.

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Emergency Plan Development

Audit Recommendation: *Use a diverse planning team, including people with a variety of access and functional needs and community organizations that support them.*

Ventura County has made a significant investment through the years establishing critical relationships with response partners, conducting pre-planning activities, testing pre-planning through exercises and educating the community on what to expect from first responders during an emergency. In the Fall of 2009, the County Board of Supervisors established the Ventura County Emergency Planning Council (EPC), whose purpose is to provide for the preparation and carrying out of plans for the protection of persons and property within the County. With this action, the Board also identified members of the EPC as representatives from the county, cities, business, military, infrastructure/lifelines, including representatives from health care, special districts, colleges/schools, local non-governmental organizations, volunteer organizations active in disasters, and other members-at-large. The EPC reviews and recommends emergency and mutual aid plans and agreements for adoption by the Board.

⑦

Prior to this audit report, Ventura County followed what we perceived to be CalOES best practice in the development of a Disability, Access and Functional Needs Plan that addressed preparedness, alert warning, transportation, evacuation and care and sheltering. The plan additionally identifies the primary County, non-profit, non-governmental partners, and for-profit entities that support the DAFN population, as well as the defined and documented role of the DAFN Coordinator embedded within the Ventura County Emergency Operations Center. During the Thomas Fire, the County took a prominent lead to be responsive to community needs. County teams and resources provided satellite outreach and education and attended and led community events and listening sessions to not only educate the community, but to best understand disability, access and functional needs across the impacted areas.

⑧

After the Thomas Fire, the County and the American Red Cross sponsored a listening session that invited community groups to learn more about emergency preparedness and how to best support the DAFN populations. Many of these organizations signed up to be American Red Cross volunteers so they could better meet the needs of the DAFN populations they served through general education and awareness.

Also following the Thomas Fire, the County noted that there were legal barriers to sharing information about vulnerable populations, including the DAFN community, between county departments during a disaster event. Potentially life-saving information about the whereabouts of individuals receiving In-Home Supportive Services (IHSS), for example, could not be shared with emergency coordinators and responders to ensure safe evacuation. The County attempted to address this situation by pursuing legislation that would authorize county social services agencies to share basic contact information during emergencies but was ultimately not successful due to privacy concerns. More work is clearly needed in this area to ensure the safety of residents under the County's care.

⑨

Through its Health Care Coalition, established in January 2014, the Ventura County Public Health Department regularly engages with community organizations that serve individuals with access and functional needs to provide emergency preparedness education and resources so that they may better serve their clients during an emergency. As part of this engagement process, emergency preparedness resources are continuously provided to these community organizations with the request that they share and educate their clients on access and utilization of such resources.

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The audit concluded that there was insufficient community engagement in the development of the emergency plans and recommends using a more diverse planning team, including people with a variety of access and functional needs and community organizations that support them. The County acknowledges that an even more inclusive and diverse engagement of community partners, especially a broader range of individuals with disability, access and functional needs in disaster planning will further strengthen our already successful plans and response efforts. To this end, we intend to add additional DAFN representatives to the membership of our EPC and to implement closer coordination with the County Executive Office on planning efforts.

⑩

Audit Recommendation: *Conduct demographic assessments to identify how many people have access and functional needs, what those needs are, and where those people are generally located.*

⑪

Gauging the needs of the community is a difficult task since there is no exact methodology for assessing the needs of every member of the population. Using data collected from their clients, the Ventura County Human Services Agency developed and manages a Disaster Preparedness Database with demographic data on clients with DAFN's. This Database is activated prior to anticipated events, (such as severe weather conditions) or at the onset of a disaster/emergency event. Activation includes GIS mapping of the Disaster Database overlays with emergency evacuation/impacted areas to determine potential impacts and/or needs of the DAFN population. The County of Ventura is working collectively to expand upon the existing Ventura County Human Services Agency Disaster Database demographic information to include data from several external sources.

⑫

Based upon the information obtained from this database, the County will continue to plan and prepare to assist all Ventura County residents with evacuating during an emergency. This evacuation process includes the rapid dissemination of alert and warning messages in multiple languages, assisting with mass transit services, and leveraging any other County resource needed during a time of need.

The County agrees that an expanded demographic assessment that builds upon the existing assessments conducted by the Human Services Agency will serve to further inform planning associated with DAFN needs during a disaster.

Alert & Warning

Audit Recommendation: *Develop alert and warning plans containing strategies to reach all people, including people who have access and functional needs and that ensure that all applicable methods are used to reach individuals.*

The County acknowledges that, during the Thomas Fire, we discovered some translation capabilities that could further be enhanced. These findings were quickly addressed during the emergency and continued to be further expanded and improved upon during and after the event, even up to the present. As an example, shortly after the Thomas Fire, the emergency hotline added the capability to provide telephonic translation for 225 languages using Voiance translation services.

⑬

There is indeed opportunity to further enhance our alert and warning communications, but we disagree that Ventura County did not prepare adequately to warn residents of impending danger from the

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Wildfire. The many modes of communication utilized were largely supported in multiple languages, not to mention the fact that no lives were lost or adversely impacted as a result of any communications during any of the disasters included in the scope of the state’s audit.

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Beyond language assistive support, during the Thomas, Hill and Woolsey Fires, a multi-tiered approach was used to disseminate emergency notifications and information to residents. This approach involved the use of both technological (VC Alert, Wireless Emergency Alerts, Emergency Alert System, Nixle, Social Media, Websites) and human resources (Law Enforcement Door-to-Door Notifications, Public Information Officers, Community Liaisons) to communicate emergency information such as evacuation orders/locations, emergency shelters (human & animal), road closures and other pertinent emergency information. The following describes the multi-tiered methods used in further detail:

- **The VC Alert emergency notification system** is a local emergency notification system that can be used to send messages to landline telephones, cellular telephones, TTY/TTD devices, fax, email, and instant messaging services. VC Alert can send both text and recorded voice messages, and the text-to-speech engine is able to send notifications in multiple languages.
- **The Wireless Emergency Alert (WEA) system** is a public safety alerting system that allows emergency notifications to be sent utilizing text messages over commercial cellular infrastructures.
- **The Emergency Alert System (EAS)** is a national public warning system that mandates cable television providers, satellite television providers, satellite digital audio radio services (SDARS) providers, and direct broadcast satellite (DBS) providers to broadcast emergency alerts and warnings.
- **Nixle** allows the Ventura County Sheriff's Office to deliver the news and events as they are occurring to the citizens of Ventura County in a variety of ways. Primarily, notifications can be delivered directly to a cell phone either by an SMS text message or E-mail.
- **VC Emergency** is a public facing website dedicated to disseminating emergency information to the public and the media via the internet.
- **Social media** such as Facebook, twitter and Instagram were used to provide emergency messaging, instructions, and recovery information to both the media and the public.
- **Public Information Officers (PIO)** are designated public safety officials assigned to provide emergency information to the media and public.
- **Door-to-Door Notifications** were conducted by public safety officials from the Ventura County Sheriff's Office and other law enforcement personnel to physically communicate emergency notification and evacuation orders to residents in the impacted areas.
- **Community Liaisons** from the County Executive Office went into the community and disseminated emergency information such as evacuation locations, road closures, shelter locations, where to obtain personal protective equipment, etc.) to non-English speaking advocacy groups (Mixteco Indigena Community Organizing Project & League of United Latin American Citizens).

Continuing the use of our multi-tiered approach to alert and warning, coupled with continuously expanding our understanding of the communication needs of the DAFN community will help sustain the

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highly effective alert and warning performance we have experienced during the significant disasters we have experienced.

⑮ As background, the County has been proactive in developing best practices in the form of plans, policies, procedures and strategies to best alert and warn Ventura County residents of incidents that pose a threat to health and safety, as demonstrated by the development of an alert and warning plan in 2011 that was approved by the Ventura County Board of Supervisors and entered into formal Memorandum of Understanding agreements (MOUs) with all ten cities in Ventura County. The alert and warning plan outlines industry best practices to send effective and timely emergency notifications to residents during an emergency. This alert and warning plan was last updated in 2017, ensuring Ventura County operated using current industry standard best practices. Ventura County's alert and warning plan was utilized successfully during the Thomas and Woolsey Fires to send over 100 emergency notifications to over 200,000 residents.

In 2018, the California Office of Emergency Services (Cal OES) in partnership with counties throughout the state, began the process of developing the State of California's Alert and Warning Guidelines. Ventura County was an active participant in helping to shape the development of the State's Alert and Warning Guidelines, which was completed in March 2019.

Ventura County is currently in the process of updating the County's Alert and Warning Plan to align with the State's Alert and Warning guidelines document. The Alert and Warning plan will incorporate current industry best practices and local lessons learned from the Thomas and Woolsey Fires.

In support of written alert and warning plans, the County recognizes that clear communication both during emergency and non-emergent events is essential and that communication should extend as far into the community as is reasonably possible in as many ways as possible. For these reasons many of our County agencies currently produce material – both printed and online – in languages other than English. All County websites have translation features. Caseworkers for our Human Services Agency have a real-time, three-way translation service (Stratus Translation software service) that operates through a tablet computer, which enables them to have face-to-face conversations with clients in any language with the translator visible to the client. This same technology was employed at Local Assistance Centers during our recent disasters. The County Executive Office (CEO) acknowledged our communities' needs over a year ago by hiring a full-time, Spanish-speaking Public Information Officer with certified translation abilities. The CEO took this important step as part of a countywide initiative to expand communication with our Spanish-speaking communities. This new position was immediately impactful during the Woolsey Fire, conducting interviews with national Spanish Broadcasters to communicate important emergency information. The Sheriff's Office of Emergency Services utilizes a cadre of Spanish certified translators also serves during emergencies and has additionally engaged a service that can translate documents in one hour or less. The County has developed, and continues to develop further, a cross-agency cadre of translators for Spanish and other languages for use in both emergency and non-emergency situations and maintains relationships with several translation services. Several County agencies and departments that work with underserved communities produce nearly all materials in both English and Spanish. This includes the County's clinic system, Behavioral Health Department, Public Health Department, the Area Agency on Aging and the Human Services Agency.

⑯ While not specifically in the context of emergency planning, the County and several of its departments regularly engage with community groups and individuals to hear concerns, share information and resources, and establish relationships of trust. County staff have daily interactions with the community

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we serve by attending community meetings and events, schools, places of worship and meeting with key community figures. County workers have deep roots, similar ethnic backgrounds, and speak the same language as those we serve and have dedicated themselves to developing trusted relationships with the community and our partners (MICOP, CAUSE, Lideres Campesinas, Proyecto Esperanza, LULAC, One Step a La Vez and various promotoras, just to name a few). County staff provide culturally appropriate services, such as in the Latino community where meeting face-to-face and personal contact is highly effective.

As a result of these community interactions and relationships, during the Thomas Fire, county staff knew the exact organizations and individuals to directly contact when checking in on the needs of those affected in Santa Paula, Ventura and Oxnard. These relationships proved to be effective during the fire when community organizations and community members also knew to directly contact county staff. An example of the importance of these relationships was a request from MICOP who works with a large Mexican indigenous population from Oaxaca that has various dialects and whose native language of Mixteco is neither Spanish nor written. During the Thomas Fire, the CEO Community Liaison had contacted a MICOP representative to share fire information when the representative expressed frustration that a local store had capped the public sale of face masks to individuals and would not sell them in bulk to MICOP, who had planned to distribute the masks to farmworkers and others in the Mixteco community. The CEO Community Liaison immediately contacted the Public Health Director, and he along with his staff, within the hour, delivered face masks to MICOP and United Farmworkers (UFW) for them to distribute. In total, Public Health provided these organizations over 40,000 face masks. These long-running, trusted and personal relationships proved to effectively aid the Spanish-speaking, undocumented and vulnerable members of our community.

During the initial response to the Thomas Fire, public information was primarily distributed by public information officers, the “readyventuracounty” website and the emergency hotline. Each of these methods of information distribution had Spanish translation available. For the Public Information Officers and Hotline, live Spanish speaking translators were available and the “readyventuracounty” website used the “Google Translate” feature, which allowed people to select a variety of languages that directly translates the displayed text. Translation services were provided at all community events and town halls which included the use of wireless translation headphones, including the first Thomas Fire-related event in Ventura on December 9. It is important to note that at the time of the incident, Google translation services on emergency websites were utilized by nearly all emergency operations centers in the state for real time emergency information dissemination in multiple languages, including all of Central and Southern California, and was considered an industry standard. The County recognized this concern with translation and our “readyventuracounty” and “vcemergency” websites were quickly duplicated as actual Spanish text sites by day three of the Thomas Fire. The EOC utilized a certified Spanish translator to update the site in real time during the remainder of the incident. The first bilingual emergency notification/warning was issued via VC Alert on December 14 which was ten days into the incident. All notifications following that were bilingual. Written products, such as press releases, were translated in real time by certified translators or by using the web-based system, One-Hour Translate.

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We agree that alert and warning is one of the most important components of emergency planning and are committed to continually seeking ways to reach all people with critical emergency communications.

Audit Recommendation: *Create a library of pre-scripted messages for each potential hazard that contains the recommended elements for effective messages and that are translated into the languages most commonly used in the community.*

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Ventura County agrees with this recommendation and the acknowledgement in the report that this practice is already being followed.

Evacuation Planning

Audit Recommendation: *Develop an all-hazard evacuation plan, including strategies for providing evacuation assistance to people with access and functional needs.*

Although Ventura County does not presently maintain a universal All Hazards Evacuation Plan, we anticipate formalizing our approach to managing the dynamic evacuation needs of an incident in the form of an evacuation annex to our Emergency Operations Plan.

Over the years, Ventura County has successfully implemented a unique response process that involves immediate coordination between police, fire and emergency management at the scene of an incident. We have found this approach to managing dynamic evacuation scenarios the most effective in terms of flexibility recognizing the one size fits all approach does not work well. Where appropriate, our operational area approach to addressing evacuation needs specific to hazard areas has been to develop, in advance, tactical response guides that are updated on an annual basis, until the hazard subsides. This approach allows stakeholders to ensure these guides are updated regularly and remain consistent with current threat conditions. This “best practice” was implemented by our Operational Area in 2015 following a debris flow threat in Camarillo Springs. Since following this approach, we have successfully been able to evacuate over 200,000 individuals having all manner of needs safely and with remarkably positive outcomes.

Audit Recommendation: *Assess the number and locations of people who will need evacuation assistance. Inventory the county’s resources to determine its capability to provide that assistance.*

⑫

The County of Ventura is working collectively to expand upon the existing Ventura County Human Services Agency Disaster Database demographic information to include data from several outside sources. Based upon the information obtained from this database, the County will continue to plan and prepare to assist all Ventura County residents with evacuating during an emergency. This evacuation process includes the rapid dissemination of alert and warning messages in multiple languages, assisting with mass transit services and para-transit resources as needed, and leveraging any other County resource needed during a time of need.

Audit Recommendation: *Establish agreements with local transit agencies and other sources of accessible transportation to provide evacuation support.*

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The County of Ventura maintains several master agreements through the Ventura County General Services Agency Procurement Department for the purposes of establishing transportation services. An example of one such contract was transit services from Roadrunner Shuttle that were successfully utilized during the Thomas Fire to transport DAFN members from shelters to the local assistance center.

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In addition to these existing private-sector agreements, numerous Ventura County Agencies are presently engaged with the Ventura County Transportation Commission to complete the Transportation Emergency Preparedness Plan. One of many outcomes anticipated with the completion of this plan is the establishment of MOUs with several transit vendors in our region for the purposes of mass transit during an emergency.

Sheltering

Prior to the Thomas Fire, the County was working with core first responders in the development of a Mass Care and Shelter Plan that included the County's primary partner in emergency sheltering, the American Red Cross. Lessons learned from both the Thomas and Woolsey Fires have helped to better inform this plan that includes recognition of a significant disability, access and functional needs community and the key partners that will be engaged to assist with supporting this community. By incorporating lessons learned from prior incidents, the County also recognizes the need to assist individuals who require communication assistance, specifically those who are deaf or hard of hearing, blind or non-English speaking.

As part of the plan to ensure the rapid identification of community needs following a disaster, the County has trained over 40 functional assessment service team (FAST) workers capable of assessing evacuation shelter conditions. FAST team members work side-by-side with shelter personnel and other emergency response workers to assist in meeting essential functional needs so people can maintain their independence during disasters and emergencies.

Audit Recommendation: *Develop sheltering plans that include strategies for ensuring that shelters are accessible to people with access and functional needs.*

Following the Thomas Fire and prior to the Woolsey Fire, the County of Ventura embarked upon a lengthy planning process to create a comprehensive Mass Care & Shelter Plan. This process is nearing completion and is slated for publication by January of 2020.

Audit Recommendation: *Conduct assessments to determine how many people may seek shelter during natural disasters, how many may have access and functional needs, and what resources the county will need to support them in shelters.*

The County of Ventura has and continues to assess the needs of the community, as it relates to emergency sheltering. Due to the complexity of individual needs and living situations, people moving and people dying, there is no exact method for yielding actionable data. We agree in concept with the recommendation but are concerned that the suggested approach in the report may still not result in sufficient actionable information. The alternative of predetermining who will be impacted by any one incident and what their individual needs are, does not yield a fiscally prudent outcome. Instead, the County of Ventura remains focused on a whole community approach, with a goal of being nimble and adaptable as the situation unfolds.

Audit Recommendation: *Develop agreements with suppliers for necessary equipment and resources to support shelter residents with access and functional needs.*

11

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The County of Ventura maintains numerous master agreements through the General Services Agency Procurement Department for the purposes of procuring equipment and supplies needed for sheltering operations. Though existing master agreements for equipment such as showering, bathing and lavatory equipment did not contain DAFN specific terms, they successfully resulted in the supplies ultimately being available for the DAFN population. While much of this equipment is already owned and maintained by the American Red Cross, the County of Ventura and many of our cities are developing plans to purchase additional shelter equipment to enhance sheltering capabilities. It is believed that with the combination of Red Cross, County, City and private-sector purchasing agreements, securing sheltering supplies in a reasonable timeframe is well within our current response capabilities. It should be noted that existing contracts have successfully provided for the needs associated with sheltering and evacuation assistance of the DAFN population during the disasters we have faced. Nonetheless, the County agrees with this recommendation and welcomes the opportunity to take a second look at our procurement agreements as the audit suggests.

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Local Assistance Centers

Audit Recommendation: *Develop a plan to ensure local assistance centers are accessible to people with access and functional needs, including by providing accessible notifications about the center, and communication services at the center for those with limited English proficiency or those who are deaf or hard of hearing.*

Ventura County has and continues to maintain a Local Assistance Center Plan following the Thomas Fire. Despite not having a plan prior to the Thomas Fire, Ventura County successfully stood up a local assistance center in partnership with the City of Ventura, which provided recovery services to victims of the fire with services and representatives from more than 44 different agencies and non-profit organizations. In part those organizations represented services from the Federal, State, and local governments, as well as faith-based organizations, community-based organizations, including State Department for passports, Department of Motor Vehicles, State Public Health - vital records, Disabled American Veterans, American Red Cross, Salvation Army, Social Security Administration, County Assessor, County homeless and housing services and elected officials to name a few. We acknowledge that our after action report indicated that additional Spanish speaking ambassadors could possibly have been beneficial at the local assistance centers but this is in addition to the ample Bi-lingual staff that were available to provide assistance as were linguistic technology aides such as the Stratus Translation service that was available via tablet devices to meet the diverse communication needs that may have presented at the Local Assistance Center. Overall more than 2,500 individuals visited the Local Assistance Center during the period of time it was operational.

We agree with the audit recommendation and Ventura County will continue to enhance the Local Assistance Center Plan. In an effort to adapt to the changing needs of the community, this plan will be reviewed on a regular interval to ensure adequacy on all levels.

County Recommendations

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Audit Recommendation: *When planning to protect people with access and functional needs, adhere to the best practices and guidance that FEMA, Cal OES and other relevant authorities have issued.*

We are committed to continuous process improvement and in that spirit will continue to pursue best practices when planning to protect people with access and functional needs.

Audit Recommendation: *Report publicly to the boards of supervisors during emergency planning about the steps they have taken to address access and functional needs.*

As has been our practice and as demonstrated by the recent update provided to our Board concerning our Public Safety Power Shutoff efforts related to medical baseline members of our community, we will continue to share emergency planning efforts with our elected supervisors. It should be noted that a member of our Board of Supervisors also serves as the Chairperson for our Emergency Planning Council.

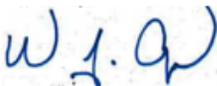
Audit Recommendation: *Consult periodically with a committee of community groups that represent the people with a variety of access and functional needs. Further, Ventura should require that representatives of the community group committees present to the boards of supervisors their review of the adequacy of the emergency plans.*

We will continue to conduct the recommended consultations with our community groups and further expand our efforts in this area.

In Conclusion

We appreciate the State Auditor's Office review of our County Emergency Plans for residents with disability, access and functional needs. Our history of successful planning, partnerships and community outreach has resulted in remarkably positive outcomes in some of the most demanding disasters of our time. Notwithstanding, we welcome the State Auditor's review as it gives us an opportunity to further improve our planning and preparations for the future to the benefit of all in our communities.

Respectfully,



Bill Ayub
Sheriff



Patrick Maynard
Sheriff OES Staff Emergency Manager



Barry Zimmerman
Human Services Agency Director



Mark Lorenzen
Fire Chief



Michael Powers
County Executive Officer

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM VENTURA COUNTY

To provide clarity and perspective, we are commenting on Ventura's response to the audit. The numbers below correspond to the numbers we have placed in the margin of its response.

We disagree with Ventura's assertion that our report does not adequately reflect the actions and steps it has taken to prepare for natural disasters. Our report contains adequate and accurate information related to the areas we reviewed, including both the areas of emergency planning best practices to which Ventura has not adhered and the steps Ventura has taken to address best practices.

①

Ventura asserts that, during its recent wildfires, no fatalities were attributable to gaps in its emergency planning and preparedness. As we discuss on page 35, we reach no conclusions as to whether any additional lives would have been saved if the county had planned differently or more fully implemented best practices.

②

During the publication process for the audit report, page numbers shifted. Therefore, the page numbers cited by Ventura in its response do not correspond to the page numbers in the final published audit report.

③

Although Ventura describes its response actions related to multiple disasters, including the Thomas Fire, we focused our review and conclusions on its emergency planning, and how that planning affected its response to the Thomas Fire.

④

Ventura states that it is difficult to develop an evacuation plan that addresses all evacuation scenarios. However, this is not the expectation set in FEMA's guidance documents. In fact, FEMA guidance explains that a plan that tries to cover every conceivable condition or that attempts to address every detail will only frustrate, constrain, and confuse those charged with its implementation. Rather, FEMA specifies that these all-hazard plans should include strategies for both no-notice and forewarned evacuations, with particular consideration given to people with access and functional needs. Therefore, we look forward to reviewing Ventura's progress in addressing our recommendation that it develop an all-hazards evacuation plan that aligns with FEMA's best practices during our post-audit follow-up process.

⑤

- ⑥ Ventura's reference to four casualties differs from Table 2 on page 13, which states that Ventura suffered five fatalities as a result of natural disasters in the last five years. Ventura's total specifically refers to civilian casualties, whereas our total also includes the loss of one first responder.
- ⑦ Ventura states that it has involved response partners and community groups in preplanning activities. Our review found that Ventura did not sufficiently include representatives with diverse access and functional needs when developing its emergency plans and we describe this conclusion on pages 24 and 25.
- ⑧ Ventura's perception that having a standalone plan for access and functional needs was a Cal OES best practice conflicts with direct advice it received from Cal OES as well as Cal OES's guidance. As we explain on page 17, Ventura developed its access and functional needs plan in May 2016 and on page 18 we explain that Cal OES informed Ventura that having a standalone plan was not advisable. Further, the training Cal OES provides on planning for access and functional needs advises against having a separate plan for these needs.
- ⑨ The assertion that Ventura makes about the access of different county departments to information about vulnerable populations differs from the information it shared with us during our review. Specifically, this assertion contradicts the explanation that Ventura's chief deputy director of human services provided to us—which we describe on pages 39 and 40—that it makes use of data on people with certain access and functional needs once a disaster occurs and that the county asks its IHSS clients to sign waivers to allow her agency to notify law enforcement about their location before the county issues a local emergency order. Further, with respect to IHSS clients, the assertion conflicts with the allowance in state law—an allowance that Ventura knew about during our audit—which specifically states that a county department of social services employee may disclose the name and address of elderly or disabled clients to emergency services personnel in the event of an emergency that necessitates a possible evacuation. Therefore, Ventura's response is contrary to state law and to the statements it made to us during our audit.
- ⑩ Although there would be some value in adding representatives with access and functional needs to Ventura's emergency planning council, this step would not implement emergency planning best practices or our recommendation. As we explain on page 24, this council is not involved in developing Ventura's emergency plans. Rather, it is responsible for reviewing and adopting Ventura's emergency plans. Best practices from FEMA and Cal OES suggest that emergency management agencies should involve individuals

with a variety of access and functional needs in all aspects of the planning process. By only including these representatives at the review and approval stages of the planning process, Ventura risks that its plans will not adequately address the needs of its whole community.

Ventura misunderstands our recommendation to conduct demographic assessments to better prepare for its community's needs during a natural disaster. We do not recommend that Ventura, or any other county, assess the needs of every member of its population. Rather, as FEMA best practices state, jurisdictions must have an informed estimate of the number and types of individuals with access and functional needs residing in their communities to begin planning. As we describe on page 20, emergency managers should use information compiled from multiple relevant sources—including social service listings and housing programs, among others—when developing an understanding of the number of individuals who have access and functional needs. Using multiple sources enables emergency management agencies to obtain a more precise understanding of the magnitude of the need in their community and of the geographic location or concentration of those needs. These aggregate estimates will allow emergency managers to make more informed decisions about the level of resources they may require during emergencies.

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The data included in Ventura's Disaster Preparedness Database is only related to clients of its human services agency. During our review, the chief deputy director explained that this database included IHSS clients and foster children. Ventura has not used this database to assist it in developing its emergency plans, as we explain on page 39. Nonetheless, in its response Ventura indicates that it believes expanded demographic data will help inform its planning. We look forward to reviewing documentation of Ventura's efforts in this area during our post-audit follow-up process.

⑫

We stand by our conclusion that, in advance of the Thomas Fire, Ventura did not adequately prepare to warn its residents about impending danger. On page 25 we describe how Ventura had not adequately engaged with persons with access and functional needs during emergency planning, including individuals with limited English proficiency. In addition, as we describe on page 17, before the Thomas Fire, Ventura lacked an alert and warning plan and, as we explain on page 34, it had not prepared to send life-saving messages in languages other than English despite having a significant population with limited English proficiency. Ventura's opposition to our conclusion is especially disappointing given its recognition on page 113 that its translation of emergency information on its website and in its alert and warning messages

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during the Thomas Fire should have been better. Ventura makes a broad claim that the many modes it used to communicate with individuals were largely supported in multiple languages. This claim ignores the significant fact that the evacuation alerts it sent directly to people's landline and cell phones were only sent in the English language until 10 days into the Thomas Fire. Finally, Ventura's own improvements to its alert and warning strategies since the Thomas Fire indicate it believes that it must be better prepared than it was for the Thomas Fire. As we explain on page 34, after the Thomas Fire, Ventura developed pre-scripted alert and warning messages in Spanish so that it would be better prepared to warn its residents about impending threats in a language they would understand.

- ⑭ Our report makes no conclusions about whether individuals perished as a result of communication deficiencies. However, Ventura's claim that no lives were adversely impacted due to communications during the Thomas Fire is both impossible to verify and doubtfully true given the large number of individuals in the county who are of limited English proficiency and would not have received alerts in a language they could understand.
- ⑮ Ventura has no alert and warning plan. As we state on page 28, Ventura has standard operating procedures that describe the use of one specific notification system that it uses for sending alert and warning messages. These procedures also specify how the county will partner with cities to issue alerts. Further, Ventura's assertion that this document outlines industry best practices to send effective and timely emergency notifications to residents during an emergency is misleading. The operating procedures discuss only one alerting method and do not address considerations for any of the other methods that Ventura describes in its response on page 119. Ventura has since developed a draft alert and warning plan, which it states was developed because of lessons learned in recent disasters. We look forward to reviewing Ventura's finalized alert and warning plan once it has been completed.
- ⑯ Ventura indicates it was engaged with a variety of community groups representing individuals with limited English proficiency before the Thomas Fire. However, it issued evacuation notices during the Thomas Fire in only English, which demonstrates that this community engagement did not influence the way Ventura prepared to alert its residents about lifesaving information. This fact highlights the importance of including such community groups in emergency planning and not relying solely on other interactions the county has with these groups for other purposes.

Ventura is incorrect that all of its emergency notifications and warnings following its initial Spanish message on day 10 of the Thomas Fire were bilingual. After it began issuing Spanish language messages, Ventura issued nine alerts through its emergency notification system. However, Ventura sent only three of these messages with full Spanish translations. A fourth message directed Spanish-speaking recipients who needed information about the Thomas Fire to visit Ventura’s website. Ventura sent the remaining messages only in English.

⑰

None of these master agreements to which Ventura refers exist for the purpose of providing evacuation assistance, as we explain on page 38. Rather, the master agreements show that local transportation vendors agreed to furnish bus tokens or passes, and none of them referenced how Ventura might leverage these agreements for evacuation assistance during an emergency. We look forward to reviewing the Transportation Emergency Preparedness Plan and accompanying MOUs that Ventura describes in its response as part of our post-audit follow-up process to determine the extent to which those documents ultimately incorporate best practices for assisting people with access and functional needs during disasters.

⑱

Ventura’s response acknowledges that it does not maintain agreements for shelter supplies that would ensure that its shelters are fully accessible to those with access and functional needs. However, Ventura expresses its belief that existing agreements that do not specifically contain provisions for obtaining accessible shelter supplies have, nonetheless, been sufficient to address sheltering needs. As we explain on page 42, documentation from Ventura showed that it struggled to obtain a sufficient number of accessible cots during the Thomas Fire. Best practices for emergency planning advise emergency management agencies to prearrange for these critical resources so that they are more easily obtained when they are needed. Therefore, Ventura’s statement that it will re-examine its existing agreements is a step in the direction of better adherence to best practices for emergency planning.

⑲

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GAVIN NEWSOM
GOVERNOR

MARK S. GHILARDUCCI
DIRECTOR



October 23, 2019

Elaine M. Howle, State Auditor*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Howle:

The California Governor's Office of Emergency Services (Cal OES) received the California State Auditor's (CSA) draft report on October 17, 2019, regarding the results of its Emergency Planning Audit (2019-103) (the Report). Cal OES appreciates the opportunity to provide a response.*

1. "Cal OES Has Not Modeled Best Practices by Including Individuals With Access and Functional Needs When Developing Guidance"

According to the Report, "Cal OES has not followed a critical best practice: involving individuals with access and functional needs" in the State Emergency Management System (SEMS) committees and in other planning groups. This statement is inaccurate and counterproductive. ①

In point of fact, Cal OES partners with, includes, and coordinates with individuals and representatives from the access and functional needs (AFN) community on the development of every major product, tool, guidance, plan, lesson learned, finding, and initiative. As a pioneer of AFN considerations in emergency ①

* On the same day that it received the report, Cal OES requested an accessible version to enable its Chief of the Office of Access and Functional Needs to review the document with greater ease. In response, CSA stated that it had no obligation to furnish an accessible report. CSA then refused to provide an accessible report unless Cal OES agreed to additional conditions, over and above Cal OES' legal obligations, related to document disposal. Rather than negotiate terms for the release of an accessible report, Cal OES made its own in-house accommodations. ②



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* California State Auditor's comments begin on page 145.

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management, Cal OES recognized early on that, nationwide, individuals with access and functional needs have historically been excluded from the emergency management planning process. That marginalization led to significant planning gaps measurable in human suffering and lives lost. It also engendered a deep mistrust within the AFN community towards local, state, and federal emergency management agencies.

To address this challenge, Cal OES took groundbreaking action in 2008 by creating an Office of Access and Functional Needs (OAFN) to identify and integrate whole community needs before, during, and after disasters. In recognition of this Office's importance, Cal OES ensured that the chief of OAFN would be a gubernatorial appointee, supported by his or her own staff, and reporting directly to Cal OES' executive office. This action was unprecedented, and today California remains the only state with such a senior level executive leading an entire office dedicated exclusively to AFN considerations.

- ① Cal OES agrees with the Report's premise that AFN representation across the SEMS committees is important, but disagrees with the notion that our current approach of "placing the same individual—the chief of its Office of Access and Functional Needs—on six of the seven committees" derogates from a whole community approach to planning. The Chief of OAFN is both a subject matter expert in emergency management and an individual with the experience of a lived access and functional need. As a substantive expert and a statewide leader whose reach extends across AFN communities, the Chief represents both the community to emergency managers, and emergency managers to the community.
- ③
- ④① The Report's narrow focus on committee representation causes it to miss the forest for the trees. By focusing narrowly on the makeup of the (largely ad hoc) SEMS committees, the Report neglects the myriad of ways in which Cal OES incorporates AFN communities, and AFN considerations, into a whole community approach to planning. In addition to SEMS, the Chief of OAFN remains in daily contact with AFN stakeholders throughout California, including the community based organizations (CBOs) that form a key part of protecting

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individuals with access and functional needs before, during, and after disasters. Similarly, Cal OES' regional staff are in frequent contact with the CBOs that represent the AFN community in their areas.

Further, by focusing on questions of representation, the Report threatens to tokenize AFN community participation in SEMS and other planning groups. To mandate the appointment of "individuals with the full range of access and functional needs" on planning groups is an unnecessarily rigid step. Such a tokenistic approach would only serve to undermine the hard-won social progress that Cal OES has helped to lead in conceptually desegregating AFN considerations—debunking the notion that AFN considerations are separate and apart from planning—and incorporating AFN into every element of the planning process.†

⑤

2. "Despite the Requirements in State Law, Cal OES Has Not Provided Critical Guidance to Local Jurisdictions"

a. Incorporation of Best Practices Related to AFN into the State Emergency Plan

The Report notes that "[i]n 2013, the Legislature amended state law to require Cal OES to update the [California State Emergency Plan (SEP)] to include proposed best practices for local governments and nongovernmental entities to use to mobilize and evacuate people with disabilities and others with access and functional needs." According to the Report, "Cal OES did not make these changes and the [SEP] still contains no guidance on evacuating people with access and functional needs, nor does it direct local jurisdictions to any such existing guidance or best practices."

In making this claim, the Report misunderstands how emergency plans in general, and the SEP in particular, function within California's emergency preparedness framework. The SEP does not include a *list* of best practices.

⑥

† CSA repeatedly declined invitations to join the Chief of OAFN at his frequent community engagement events throughout the state. Further, it appears that CSA neglected to contact the major CBOs that engage with Cal OES on AFN considerations.

⑦

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⑧ Rather, it sets forth a framework that *reflects* best practices in a manner that is sufficiently general to enable emergency managers to respond to all hazards. Consistent with this approach, the current SEP does not segregate AFN considerations in a single section, or relegate them to an appendix. Rather, it addresses AFN considerations throughout the entirety of the document, using terms like “access and functional needs,” “AFN,” and “disability” over two dozen times, including with reference to evacuation. Even when the SEP does not use these terms, it incorporates and reflects best practices related to the protection of socially vulnerable populations.

⑨ The Report prominently references the Congressionally enacted Post-Katrina Emergency Management Reform Act (PKEMRA) of 2006. In doing so, the Report underscores the degree to which California has been a pioneer in incorporating AFN considerations into its planning. Particularly, the Report cites PKEMRA as a driving force for “provisions to improve planning to meet access and functional needs.” PKEMRA also changed the way the Federal Emergency Management Agency (FEMA) and the federal government approached emergency management.

Based on PKEMRA, in March of 2008, the National Response Framework (NRF) replaced the National Response Plan (NRP) setting forth a national standard for framework design that came into alignment with the SEP, which was already well under development at the time. The SEP was also the foundation of California’s accreditation from the Emergency Management Accreditation Program (EMAP), the premier national standard for emergency management programs.

Parallels between the National Framework and California SEP are not accidental, as California has consistently modeled the way for emergency management and plan development, just as California’s Standardized Emergency Management System (SEMS), established in 1993, was replicated nationally through the National Incident Management System (NIMS) in 2003.

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As evidenced by its organization, plans, and actions, Cal OES has been a leader in changing the discourse from one that segregates and tokenizes AFN considerations, to one that incorporates AFN considerations across all areas. In short, consistent with Cal OES' pioneering efforts, the SEP reflects AFN considerations throughout its text. ⑧

b. The Use of, and Advice to Local Jurisdictions about, Disaster Registries

The Report states that "Cal OES has not fully complied with a state law related to the establishment of disaster registries." Cal OES is not required to, nor does it, maintain a disaster registry. Cal OES has determined that disaster registries are themselves not a best practice. Among other problems, disaster registries raise privacy concerns, and are unlikely to contain complete, updated, and accurate information since they are a voluntary, opt-in system. These registries may also give a false sense of assurance that, for instance, an individual who opts in to the registry will be afforded particular evacuation assistance. This could be problematic during a disaster. ⑩

Cal OES believes there are better approaches to engaging the AFN community, such as coordinating through CBOs. Accordingly, Cal OES has not itself developed a statewide registry, and its guidance to counties is not to use them. However, when counties wish to use such registries, Cal OES has provided, and continues to provide, advice and guidance on considerations local governments should be aware of with regard to these registries. In addition to providing guidance to local government on a frequent basis via day-to-day interaction, Cal OES has published on its website guidance specific to disaster registries. ⑩

Additionally, the report indicates, "[t]o the extent that any county could have benefited from guidance on registry management, Cal OES has failed to fulfill its mission of supporting communities through collaboration with local jurisdictions." This assertion is at best speculative and at worst incorrect. Cal OES has always provided feedback, guidance, and technical assistance to local government agencies indicating a desire to use such a registry. To conclude that Cal OES "failed to fulfill its mission" is misguided, exaggerated, and fails to recognize the ⑪

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nearly constant and regular support and guidance Cal OES provides to local governments throughout the state in the context of access and functional needs in disasters.

c. *Translated Message Templates*

During the audit process, CSA informed Cal OES that state law required it to “create a library of translated emergency notifications that may be used by designated alerting authorities when issuing emergency notifications.” Cal. Gov. Code § 8594.16(b). Although statute requires Cal OES to “consider the two most commonly spoken languages other than English in the state when creating the library,” *id.*, CSA suggested shortly before completing its draft report that Cal OES should create message templates in 15 languages. Cal OES then created a style guide, as well as a message templates in 19 languages. Those languages are:

1. English
2. Spanish
3. Chinese Mandarin
4. Chinese Cantonese
5. Vietnamese
6. Tagalog
7. Korean
8. Armenian
9. Russian
10. Farsi
11. Japanese
12. Arabic
13. Mon-Khmer/Cambodian
14. Hmong
15. Laotian
16. Punjabi
17. Hindi
18. Thai
19. Portuguese

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After Cal OES completed these templates, CSA did not engage with Cal OES to address further concerns. Rather, CSA revised their Report, adding new critiques without Cal OES' input, concluding that Cal OES' 19 templates were "marked by deficiencies." (13)

CSA's rush to judgment is reflected in the quality of its product. Most significant, the purported "deficiencies" correspond to operational and tactical considerations best left to the sound discretion of emergency management professionals working in a dynamic environment. As noted below, rather than address here the critiques as set forth in the Report, Cal OES will engage with local jurisdictions and emergency management professionals with competent experience to determine the most operationally sound approach to enhancing the effectiveness of translated message templates. (14)

3. "Cal OES Has Not Ensured That Local Jurisdictions Can Locate Its Guidance Regarding Access and Functional Needs"

The Report notes that Cal OES has developed a large volume of information ("almost 250 links to different websites and documents") as well as web-based tools, "for local jurisdictions to use in their emergency planning, including their planning to meet access and functional needs." The Report suggests that these tools and information could be better organized. While Cal OES is committed to making its webpages easy to navigate, the Report's suggestions largely miss the mark. (15)

As the Report alludes, Cal OES has curated a large volume of AFN resources that are centrally located and free for local jurisdictions and other stakeholders to use. These resources include everything from guidance documents and "lessons learned" products to innovative tools such as the Cal OES Access and Functional Needs Web Map. Indeed, the Web Map is an illustrative example of the innovation that Cal OES has advanced as a pioneer in the AFN space. A first-of-its kind initiative, the Web Map deploys Geographic Information System mapping technology to overlay geographic data on active threats (such as fires), alongside the location of shelters and warming/cooling stations, assets

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that the AFN community can use in an emergency (such as accessible transportation and accessible hygiene resources), as well as county-level Census data on the AFN community. Not only is this resource instructive to members of the AFN community, it assists emergency managers in all of California's 58 counties in identifying, locating, and deploying AFN related assets during all phases of an emergency.

⑮ After making note of the sheer volume of AFN resources that Cal OES has compiled, the Report correctly observes that Cal OES "does not indicate" which resources are the "most valuable for local jurisdictions." Nor would Cal OES ever do so, for at least two reasons. First, local jurisdictions are better placed to determine which resources are most useful to them. Second, each local jurisdiction has unique needs, making it infeasible for Cal OES to impose a single, endorsed list of "best" resources applicable to all of California's 58 counties.

⑮ Further critiquing Cal OES' webpage, the Report suggests Cal OES "has not made those [AFN] resources easily available to the local jurisdictions." While Cal OES again agrees that its website can be improved, it is false to suggest that an imperfect website means Cal OES has not made informational resources available to local jurisdictions. Cal OES, most often through OAFN, notifies jurisdictions across the state regarding new inclusive planning products via a multiplicity of methods such as email, presentations at meetings (conferences, regional events, Mutual Aid Regional Advisory Committees [MARACs], etc.), outreach through each region, direct contact, articles in newsletters, and other means.

4. "Cal OES Has Not Used After Action Reports to Share Lessons Learned From Recent Disasters, Even Though Doing So Could Aid Local Jurisdictions' Planning Efforts"

⑮ The Report notes that Cal OES has not completed its after-action reports (AARs) in a timely manner. Relying on this observation as a premise, the Report goes on to state that Cal OES has failed to share lessons learned from recent disasters with local jurisdictions. While the Report's premise is accurate, its conclusion could not be more wrong.

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Before CSA began its audit, Cal OES identified the backlog in its AARs. The principal reason for this backlog is that recent disasters have sharply elevated Cal OES' workload. Cal OES is configured such that its "steady state" staff also comprise its surge capacity; the same personnel who draft AARs also support disaster response and recovery activities. As disasters increase in scale, complexity, and frequency, there are more AARs to complete, yet fewer staff to complete them. ⑰

The sheer volume of Cal OES' disaster-related work is hard to overstate. As the Report itself notes, from January 2014 through December 2018, there were no fewer than 61 gubernatorially declared disasters in California. In 2017, after dealing with six years of unprecedented drought conditions, California experienced record rainfalls that resulted in Presidential Disaster declarations in 53 of California's 58 counties. The failure of Oroville Dam spillway resulted in the largest non-hurricane evacuation in U.S. history. The 2018 calendar year brought the largest, deadliest, and most damaging fires in the state's history. By the end of 2018, wildfires in California killed over 120 people, destroyed more than 22,700 structures, and burned over 1.8 million acres. Ten of California's most destructive fires have occurred since 2015, with four of the largest wildfires occurring since 2017. California's deadliest wildfire leveled nearly the entire city of Paradise in 2018, killing 86 people; the cleanup, rebuilding, and full economic recovery for this fire alone could span a decade. In July 2019, a 6.4 magnitude foreshock, and 7.1 magnitude earthquake, struck near Ridgecrest—the most powerful earthquake in California in nearly 20 years.

To adapt to the task of completing AARs while simultaneously addressing the response and recovery needs that result from this unprecedented series of disasters, Cal OES has implemented a new AAR process. The new system is being utilized on both backlogged AARs and new disasters beginning in 2019. As the Report notes, statute requires that Cal OES provide these AARs to all "interested emergency management and public organizations," and Cal OES does so. ⑱

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- ⑩ However, these gaps in the AAR process do not mean Cal OES has failed to share lessons learned from recent disasters with local jurisdictions. Indeed, in focusing on Cal OES' formal AAR process, the Report fails to recognize the myriad of debriefs, hot washes, and other feedback loops designed to continually improve California's emergency management processes and educate local government on best practices. For example, the very exercise of developing an AAR requires Cal OES and local jurisdictions to engage in a critical dialogue that enriches the understanding of both Cal OES and the jurisdictions themselves. In practice, these critical dialogues begin immediately after—if not during—a disaster. Furthermore, as the Report itself notes, Cal OES engages with operational areas through MARAC meetings where Cal OES and local government regularly discuss and share best practices. The MARACs, as part of the SEMS Maintenance System, can escalate collective emergency management concerns and initiate improvements statewide with or without an AAR.
- ⑩ Finally, in focusing on formal structures and documentation—the Report's discussion of MARAC minutes is a notable example—the CSA neglects to credit Cal OES' constant communication with all operational areas before, during, and after disasters about best practices and lessons learned. These nearly real-time processes are just as important—if not more important—than the formal AAR process in ensuring that lessons are learned and shared throughout California.

CSA Recommendation:

To ensure it fulfills its responsibilities under state law, Cal OES should, by no later than June 2020, issue the guidance that state law requires it to produce related to access and functional needs, including guidance related to establishing disaster registries and guidance on evacuating people with access and functional needs.

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Corrective Action by Cal OES:

Cal OES will issue formal guidance regarding disaster registries. For the reasons described above, Cal OES will not change its approach to SEP but will continue to reflect AFN considerations throughout all of its planning documents.

①9

CSA Recommendation:

To ensure that it adequately equips local jurisdictions to send alert and warning messages in languages that their residents will easily understand. Cal OES should do the following:

- Provide clear direction to individuals who speak English so that they know which of the translated messages they should use in what specific circumstances.
- Revise the messages it has provided so that local jurisdictions can more easily adapt them for use in a variety of disaster situations.
- Expand its style guide to include terminology that emergency managers are likely to need to effectively modify their local messages and also to include translations for the other commonly spoken languages in the State.

Corrective Action by Cal OES:

Cal OES notes that it is in full compliance with the law governing translated message templates. As noted above, Cal OES will engage with emergency management professionals, as well as with local jurisdictions, to determine the most operationally sound approach to enhancing the effectiveness of translated message templates.

①4

CSA Recommendation:

To improve local jurisdictions' ability to quickly access guidance and resources related to planning to meet access and functional needs during natural disasters. Cal OES should make its emergency planning guidance and resources easily available through restructuring and improving its access and functional needs library webpage by April 2020.

Corrective Action by Cal OES:

Cal OES will continue to improve the AFN resources provided through all channels on an ongoing basis.

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Cal OES appreciates the assistance and guidance offered during CSA's audit. Should you have additional questions or concerns, please contact Ralph Zavala, Cal OES Internal Audits Office Chief, at (916) 845-8437.

Sincerely,



FOR
MARK S. GHILARDUCCI

Director

Attachments:

cc: Christina Curry, Acting Chief Deputy Director
Timothy Perry, Chief of Staff
Eric Lamoureux, Acting Deputy Director, Response
Vance Taylor, Chief, Office of Access and Functional Needs
Ralph Zavala, Chief, Internal Audits Office

Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES

To provide clarity and perspective, we are commenting on Cal OES's response to the audit. The numbers below correspond to the numbers we have placed in the margin of its response.

Cal OES asserts that our conclusions about the extent to which it included individuals with access and functional needs in its planning groups are inaccurate and counterproductive. They are neither. Our findings are supported by sufficient and appropriate evidence, and our report makes clear the consequences of Cal OES failing to follow state law and best practices. As we indicate on page 59, state law requires Cal OES to include, to the extent practicable, representatives of people with specific types of disabilities on the committees it uses to issue guidance to local jurisdictions and to develop and approve the State's system for emergency management. At no point during our audit did Cal OES argue that such participation was not practicable. Therefore, in disregarding our findings, Cal OES ignores best practices and its statutory obligation to include key individuals on its committees.

①

In addition, Cal OES's own guidance states that successful emergency planning depends on involving representatives of people with access and functional needs when strategies are considered and plans are developed, which it refers to as "having the right people at the table." Cal OES guidance further states that it is important to recognize that emergency preparedness, response, and recovery involves the entire community, therefore a broad spectrum of the community should have a voice at the planning table. As we describe beginning on page 59, contrary to requirements in state law and to its own guidance, Cal OES included only one representative of people with access and functional needs on its committees—the chief of the Office of Access and Functional Needs (chief)—who is not representative of all access and functional needs populations. Including only this one individual does not give voice to a broad spectrum of the access and functional needs community during planning, and risks not adequately addressing the needs of those in that community.

Finally, Cal OES's failure to comply with state law and implement best practices can have significant detrimental effects. As we note on page 60, when Cal OES fails to include diverse representation in its emergency planning efforts, the risk is higher that local jurisdictions will not believe that the practice is worthwhile for their own planning efforts. Cal OES also risks not sufficiently

addressing access and functional needs in its guidance for local jurisdictions when it does not adequately include representatives of people with those needs in its development. Local jurisdictions should be able to rely on Cal OES's guidance regarding what to include in their emergency plans. As we state on page 61, if Cal OES's guidance does not fully address access and functional needs, local jurisdictions' plans are also less likely to do so.

② State law requires Cal OES to provide accessible information to its employees, which would include a copy of our draft report. Regardless, we attempted to assist Cal OES in accommodating its employee while complying with confidentiality requirements under state law that we must maintain. That law requires that all substantive communications relating to an ongoing audit are confidential, including draft copies of our reports; dissemination to unauthorized individuals is a misdemeanor. Therefore, we maintain strict security protocols, including control of hard copies of our draft report that we provide to auditees, and we ask them to do the same. In response to Cal OES's request, we agreed to depart from our usual practice and provide an electronic draft copy for Cal OES's review. The only "condition" we applied to providing the electronic copy was related to the secure disposal of that copy. Specifically, in order to have reasonable assurance that this confidential, but now easily disseminated electronic document had remained secure, our legal counsel contacted Cal OES' chief counsel to request that at the end of the 5-day review period the chief counsel provide us with a written statement that all electronic and hard copies had been deleted or destroyed. The chief counsel refused to provide this assurance and thus we declined to provide an electronic draft copy of the report.

③ We agree that the chief is a subject matter expert regarding access and functional needs. However, as we note on page 59, despite that subject matter expertise, the chief cannot provide the same depth of insight on specific access or functional needs as people with those needs or their representatives can provide. As we list on page 8, under state law individuals can have access and functional needs due to:

- Developmental or intellectual disabilities
- Physical disabilities
- Chronic conditions
- Injuries
- Limited or no English proficiency
- Age, including older adults and children
- Living in institutionalized settings
- Low income

- Homelessness
- Transportation disadvantages, including dependency on public transit
- Pregnancy

Further, Cal OES’s perspective is in conflict with the chief’s statements to us during the audit. As we note on page 59, the chief expressed his belief that having multiple subject matter experts on access and functional needs would be beneficial and that planning is better when it includes a broader diversity of perspectives.

Cal OES attempts to minimize its failure to adequately include individuals with access and functional needs on its committees by stating our review had a “narrow focus.” By doing so, Cal OES downplays the critical functions that its committees perform. To the contrary, the committees we reviewed are responsible for the formation of the guidance that local jurisdictions throughout the State rely on to know how to conduct their emergency planning and response activities. For example, one committee we reviewed was responsible for developing the State’s guidelines on alert and warning messages—messages that frequently contain life-saving information. The importance of this committee’s work is reinforced by state law, which authorizes Cal OES to impose conditions on local jurisdictions’ receipt of grant funding unless they operate their alert and warning activities in a manner consistent with those guidelines. Further, we observed that the three counties we reviewed were waiting for Cal OES to publish its alert and warning guidelines before adopting changes to their own plans. In other words, the actions of Cal OES’s committees can have a profound effect on local jurisdictions’ emergency planning and management. Therefore, it is imperative that Cal OES ensure that those committees adequately integrate representatives of people with access and functional needs by including them as members of its committees.

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Cal OES’s comment on including people with access and functional needs in its planning is disconcerting. FEMA and Cal OES guidance indicate a broad diversity of perspectives is critical to a planning process. These best practices were the basis of our recommendation that the Legislature require Cal OES to include representatives of people with access and functional needs on its planning committees. By claiming that our recommendation would promote “tokenism”—the act of making only a symbolic or perfunctory effort to perform a task—Cal OES implies that these representatives would provide no actual value to its planning processes, a position at odds with its assertion of being a pioneer of access and functional needs considerations in emergency planning. Also, it is dismaying to see Cal OES indicate that this kind of representation on its committees would somehow serve to

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undermine the position of people with access and functional needs. Finally, Cal OES presents no clear reconciliation of its best practice advice to local jurisdictions to include a broadly diverse group in emergency planning, the recently-created requirement in state law for local jurisdictions to follow that best practice, and its apparent belief that our recommendation to do the same thing at the State level is inadvisable and unnecessarily rigid.

- ⑥ Throughout its response, Cal OES attempts to distract from our conclusions that it failed to follow state law by suggesting we do not understand the subject matter of this audit and by minimizing the importance of following state law. The fact that Cal OES has not complied with key state laws related to access and functional needs is clear and undeniable, as we demonstrate throughout Chapter 2 of our report. Despite the various objections that it includes in its response, Cal OES does not have authority to decide whether to comply with state law. Our report makes clear the effects of Cal OES's noncompliance: local jurisdictions are without the important guidance that the Legislature and the Governor intended that Cal OES provide to them.
- ⑦ Cal OES appears to suggest that there was a gap in our analysis because we did not attend its community events or have discussions with community based organizations with which it claims to partner. During our audit we were aware of the chief's community events and Cal OES's assertions that it has discussions with community based organizations. Consistent with the standards we are required to follow and our approach to all audits, we used our professional judgment to determine the procedures necessary to obtain sufficient and appropriate evidence to support our conclusions. For instance, we reviewed Cal OES's alert and warning guidelines and requested documentation to support that Cal OES had involved representatives of people with access and functional needs in the development of those guidelines. Cal OES was unable to provide that documentation, and as we discuss on page 60, the alert and warning guidelines do not adequately address strategies for meeting access and functional needs. Therefore, despite the chief's attendance at community events and the claims Cal OES makes that it engages with major community based organizations, it did not adequately involve those groups in the development of the alert and warning guidelines, which ultimately affected the quality of those guidelines. Therefore, we stand by our conclusions.
- ⑧ Cal OES raises matters that are unrelated to the requirement in state law or the conclusion we present in our report about its failure to comply with state law requiring it to provide certain guidance to local jurisdictions. State law does not require Cal OES to segregate access and functional needs considerations or relegate them to an appendix, and our report does not say that Cal OES should do so.

In the Introduction to our report we present the fact that in 2006 Congress and the President created the Post Katrina Emergency Management Reform Act, which called on FEMA and state and local emergency response agencies to more sufficiently address access and functional needs in the preparation for and response to natural disasters. We also note that, in 2008, California created the Office of Access and Functional Needs at Cal OES. However, as we detail in Chapter 2 of our report, there have been critical deficiencies in Cal OES's leadership and its support of local jurisdictions related to planning to protect and assist people with access and functional needs.

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Contrary to Cal OES's statement, our report does not suggest that it is required to or should maintain a disaster registry. Rather, our report describes, on page 55, that state law requires Cal OES to develop model guidelines for local jurisdictions that intend to develop disaster registry programs, including recommendations for addressing known problems with the use of disaster registries. However, Cal OES failed to develop that guidance as state law requires.

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The guidance that Cal OES describes is inadequate because it does not meet the requirements in state law. We discuss on page 55 that state law requires Cal OES to develop model guidelines on disaster registries, including recommendations for addressing known problems with the use of disaster registries, such as maintaining privacy for the people on the registry, and clarifying that the intent of the registry is not to provide immediate assistance during an emergency and that individuals must be prepared to be self-sufficient. However, as we also discuss on page 55, the guidance that Cal OES has issued about disaster registries does not contain all of the information that state law requires. Instead, it states that registries have proven unworkable, generally emphasizes concerns about registries, and provides little advice about how a local jurisdiction should manage a registry.

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Cal OES takes our conclusion on page 56 out of context and then states that it is misguided, exaggerated, and fails to recognize the actions it has taken to support local jurisdictions. Our conclusions are not misguided or exaggerated and the support that Cal OES provides to local jurisdictions does not excuse its failure to follow state law. Since 1991, state law has required Cal OES to provide guidance on disaster registries and our review found that it has not done so. To fully satisfy its mission to support local jurisdictions, Cal OES should provide all statutorily required support to local jurisdictions. Therefore, because it has not provided the required guidance, Cal OES has not fulfilled its mission. We also note that later in its response, on page 143, Cal OES agrees that it should

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follow state law and issue guidance on disaster registries. We look forward to reviewing documentation of its efforts as part of our post-audit follow up process.

- ⑬ There is significant context missing from Cal OES's response. Over the course of this audit, Cal OES had ample opportunity to discuss these templates with us but chose not to do so. As we state on page 56, we repeatedly asked Cal OES about its plan for developing these statutorily required templates and a translation style guide. We first requested this information in May 2019, and for several months Cal OES staff did not articulate such a plan. After we told Cal OES that we planned to report that it had no plan for producing the required templates and style guide, Cal OES finally responded. Specifically, in mid-September 2019, Cal OES claimed that it had contracted with a translation firm for the purposes of fulfilling this requirement. When we asked for a copy of this contract, Cal OES did not provide it.

In late September 2019 we met with Cal OES to share a draft of our audit report and at that meeting Cal OES informed us that it had posted Spanish language message templates to its website and that it was developing Chinese language templates. During the meeting Cal OES shared no plan for developing a translation style guide or templates in any other languages. Shortly after that meeting, while we were preparing the final draft report for Cal OES's review, Cal OES notified us that it had posted message templates in 19 languages and a translation style guide to its website. We reviewed the templates and style guide and made revisions to our draft report before providing it to Cal OES for its review. Subsequently, we contacted Cal OES multiple times to inquire as to any concerns it had about our conclusions. However, Cal OES never raised concerns about our conclusions concerning its message templates and translation style guide.

- ⑭ Cal OES dismisses the deficiencies that we identified in its message templates and translation style guide but does not explain what specifically about our critiques it takes issue with. The deficiencies that we identified in the message templates are irrefutable and, as we describe beginning on page 56, render the message templates largely unhelpful to local jurisdictions. We further state in our report that these deficiencies increase the risk that local jurisdictions will not use the templates or use the wrong message template in an emergency situation. We encourage Cal OES to follow through on its pledge to work with local emergency managers to enhance the effectiveness of its templates, although partnering with local jurisdictions is something that we would have hoped Cal OES had done in advance of releasing these templates.

We look forward to reviewing documentation of Cal OES's engagement with local jurisdictions to improve its message templates and translation style guide.

Cal OES does not explain why it thinks our recommendation to make its guidance and resources easily available misses the mark. As we state on page 58, Cal OES's own chief acknowledged that the access and functional needs library could be improved so that local jurisdictions can more easily navigate it, and indicated that Cal OES would seek a contract to restructure and improve the webpage.

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Cal OES also suggests that it would not recommend valuable resources to local jurisdictions because of each local jurisdiction's unique needs. In doing so, Cal OES ignores that—although local jurisdictions needs may vary—there are key sources of planning best practices that are beneficial for all local jurisdictions. For instance, FEMA has published several major guidance documents related to alert and warning, evacuation, and sheltering, which we reference in our report. Cal OES also ignores that some of the almost 250 documents on its webpage are simply not relevant for most local jurisdictions, such as the guidance directed at hospitals or polling places that we reference on page 58. Local jurisdictions should not have to search a webpage containing irrelevant guidance to find key sources of planning guidance.

Cal OES acknowledges in its response that it has not complied with state law related to the timely completion of after-action reports. As we discuss beginning on page 61, Cal OES is uniquely positioned to identify local jurisdictions' successes and struggles in responding to emergencies, and share that information with local jurisdictions across the State to help them in their planning. However, Cal OES has not completed after action reports for the vast majority of natural disasters that have occurred in the last five years, and it has not broadly disseminated lessons learned from those disasters. In its response, Cal OES restates perspective that it provided during our audit that it has shared lessons from recent disasters at various in-person meetings. We note this perspective on page 65, and state that we reviewed minutes from the meetings at which Cal OES claimed that it shared lessons learned. Although the minutes indicated that some local jurisdictions shared lessons learned during those meetings, several local jurisdictions did not attend the meetings, meaning that they would not have benefited from those discussions. Moreover, these discussions are a poor substitute for the broader and more complete perspective that after-action reports are intended to provide. As we state on page 65, by not widely publicizing lessons learned from recent disasters—through after-action reports or any other means to disseminate

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those lessons—Cal OES has failed to broadly distribute information that could help local jurisdictions across the State learn from the experiences of others and improve their ability to effectively respond to natural disasters.

- ⑰ In its response, Cal OES indicates resource constraints are the reason why it has been unable to complete timely after-action reports in accordance with state law. However, Cal OES did not provide this explanation to us during our audit. Rather, our report contains the two reasons for delayed and incomplete after-action reports that Cal OES provided during our review: its belief that state law is unclear as to when those reports are due and that local jurisdictions do not always submit their own after-action reports to Cal OES. Because it did not share information about resource constraints with us, we have no assessment on the degree to which resource availability is a sufficient explanation for Cal OES's failure to complete after-action reports. However, we do note that even though Cal OES considers resources to be a constraint for it in completing after-action reports, its response does not indicate any actions on its part to reallocate or seek additional resources to address this constraint.
- ⑱ We note Cal OES's adoption of a new after-action report process in March 2019 on page 64 but also note that as of October 2019, Cal OES had not issued any after-action reports using that process.
- ⑲ In declining to implement our recommendation to issue the guidance on evacuating people with access and functional needs, Cal OES indicates that it does not intend to fulfill its statutory obligation to do so. As we note in comment 6, Cal OES does not have the authority to choose whether to comply with state law.