

California Emergency Services Association



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March 30, 2023

The Honorable Freddie Rodriguez
Chair, Emergency Management Committee
1020 N Street, Room 360B
Sacramento, CA 95814

Re: AB 1108 (Calderon): County Emergency Plans – OPPOSED or OPPOSED
UNLESS AMEND As Introduced

Dear Assembly Member Freddie Rodriguez:

On behalf of the California Emergency Services Association, representing 790 professional emergency managers, and most counties in the state, we must regretfully oppose, unless amended, AB 1108 (Calderon). AB 1108 would require each county to review and update its emergency plan at least every two years. Current law requires the Office of Emergency Services to establish best practices for developing and updating a county emergency plan by January 1, 2022, and to establish a process for review and support for these plans, as described on-line at this [link](#).

As a practical matter, between 2016 and 2022 there have been seven substantive bills adding changes to county emergency plans. Counties are required to:

1. Send a copy of its emergency plan to CalOES on or before March 1, 2022, and upon any update to the plan after that date (GC 8593.3.2(a))
2. Update plans to include Access and Functional Needs (GC 8593.3(a) (1-3).
3. Add specified content related to cultural competence, alerts and evacuation, FEMA recommendations, CalOES best practices, among others.
4. In accordance with Government Code 8593.2, subdivision (c) and Government Code 8610, subdivision (c), Cal OES reviews a minimum of 10 County Emergency Operations Plans (EOPs) each year starting in 2022. This includes review by regional CalOES Branches. This process as outlined on the [CalOES website](#), includes extensive and complex analysis and review of the plans. Seven separate reviews are conducted, from Regional Emergency Services Coordinators, to legal, to Office of Access and Functional Needs, among others. The process is lengthy and expensive, and it achieves the goal of a statewide approved county plan.

CESA/We strongly recommend allowing for one full cycle of review under GC 8593.2 before amending deadlines again for counties as outlined in (4) above. These updates are comprehensive, sometimes including up to 40 different appendices, and are both important and very expensive to complete, and are very staff intensive.

Counties are not directly funded for updates of emergency operations plans, but all counties review and update their plans regularly based on real and practically foreseeable threats.

In addition to these plans, counties prepare regular updates to General Plans, region-specific plans (including Local Coastal Plans), and other general plans that include emergency and hazard planning. CESA advocates for full and flexible funding for on-going emergency preparedness exercises and training at the state and local level, and policies and requirements that are practical and achievable.

CESA/We recommend the following changes to AB 1108 in order to make the bill achievable:

- A. Provide up-front and identifiable funding to counties for all state mandated emergency management planning.
- B. Align program outcomes to GC 8593.2 by aligning review and preparedness of plans with Cal-OES review (10 counties minimum per year) to allow for one full cycle before changing deadlines. (see D below).
- C. Require the SEMS maintenance process for a best practices document developed and published by CalOES to be completed in final form prior to changes to deadlines.
- D. In order to keep plans up to date, replace the EOP 2-year requirement with a non-competitive grant that supports the development of the Integrated Preparedness Plan (IPP) formerly the Multi-Year Training and Exercise Plan (MYTEP) which is currently due every September to CalOES.
- E. Include funding or including academic involvement and supporting local jurisdictions not only with research and reports, but also annual regional discussions explaining the research, inclusive of modeling that could support local plan development.
- F. Include financial support of jurisdictions seeking Accreditation through the Emergency Management Accreditation Program (EMAP).
Reason: Accreditation meets national best practice standards and may be a better holistic solution to just an EOP updated biennially.

Again, with regret we must oppose unless amended your AB 1108 and look forward to working with you to make practical changes to the legislation. Please contact our Legislative Committee Chair, Ray Riordan, ray.riordan@sanjoseca.gov or 408.398.9314 with any questions.

Sincerely,



Dana Carey
CESA State Board President

cc:

The Honorable Lisa Calderon, California State Assembly
Honorable Members, Assembly Emergency Management Committee
Ryan Fleming, Assembly Emergency Management Consultant
Brent Finkel, Assembly Republican Consultant