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OIG | OFFICE *of the* INSPECTOR GENERAL

Independent Prison Oversight

May 2025



**Audit of the California
Department of Corrections and
Rehabilitation's Natural Disaster
Emergency Preparedness and
Mitigation Efforts**

AUD N° 24-01

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May 1, 2025

Mr. Jeffrey Macomber
Secretary
California Department of Corrections and Rehabilitation
P.O. Box 942883
Sacramento, CA 94283-001

Dear Mr. Macomber:

Enclosed is the Office of the Inspector General's (the OIG) report titled *Audit of the California Department of Corrections and Rehabilitation's Natural Disaster Emergency Preparedness and Mitigation Efforts*. California Penal Code section 6126, subdivisions (b) and (c) authorize the OIG to initiate reviews of the California Department of Corrections and Rehabilitation's (the department) policies, practices, and procedures. In this audit the OIG evaluated the department's preparedness and mitigation efforts for wildfires, floods, and earthquakes. We reviewed the department's All-Hazards Emergency Operations Plan, as well as the 2024 site-specific emergency operations plans for 30 of the department's prisons, assessing the department's ability to evacuate prisons threatened by wildfires, floods, and earthquakes. We also completed an in-depth review of the preparedness of three prisons—Valley State Prison, the California Rehabilitation Center, and San Quentin Rehabilitation Center—located in different parts of the state. We reviewed their methods for assessing their individual risks for wildfires, floods, and earthquakes, their documented mitigation plans, and whether they revised and improved their policies in response to threats posed by natural disasters.

While California's prisons are vulnerable to wildfires, floods, and earthquakes, we found they are not adequately prepared to respond to emergencies posed by natural disasters. Not only are some prisons overcrowded, but the department is unable to evacuate the incarcerated population and staff at most prisons within the first critical 72 hours of an emergency. In addition, prisons do not have specific plans to externally evacuate the incarcerated population, and any effort to evacuate a prison is limited by the department's transportation fleet, which maintains some high mileage vehicles and is operated out of three regional hubs. For one prison, the closest regional hub is approximately 400 miles away.

Furthermore, almost all prisons assess their risks from wildfires, floods, and earthquakes, but we found they generally use different methods for assessing their risks. Using varied



risk assessment methodologies likely resulted in the inconsistent risk ratings we found among prisons. By using a standardized process to ensure a consistent and accurate risk rating, prisons can better develop mitigation strategies for the specific risks to which they are most susceptible.

We also found that the emergency plans prisons develop in preparation for emergencies are not substantively reviewed by the department's headquarters as required by California regulations and departmental policy. Without a robust review and approval process, the department cannot meet its obligation to ensure that prisons submit up-to-date and adequate site-specific emergency plans.

Finally, we found that despite departmental policy requiring prisons maintain mutual aid agreements, two prisons did not enter into mutual aid agreements and others failed to include key details of the mutual aid agreements in their site-specific emergency plans. Without the mutual aid agreements or the key details included in the emergency plans, the value of maintaining such agreements is diminished.

Following publication, we request that the department provide its status on implementing our recommendations at intervals of 60 days, six months, and one year from the date of the audit.

Respectfully submitted,



Amarik K. Singh
Inspector General

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Definitions

Term	Definition
All-Hazards Emergency Operations Plan	The basis for all departmental emergencies requiring activation of the Incident Command System (ICS).
Cal OES	The California Governor’s Office of Emergency Services is responsible for the state’s emergency and disaster response services for natural, technological, or man-made disasters and emergencies, including responsibility for activities necessary to prevent, respond to, recover from, and mitigate the effects of emergencies and disasters to people and property.
The Department	The California Department of Corrections and Rehabilitation.
Site-Specific Emergency Plan	Each prison’s site-specific plan that forms the basis for their emergency response procedures and protocol.
Site-Specific Supplements	Each prison’s site-specific procedures that supplement their site-specific emergency plans and address each prison’s specific issues or hazards.
Emergency Planning and Management Unit	The unit within the Office of Correctional Safety responsible for establishing, revising, and maintaining the California Department of Corrections and Rehabilitation’s emergency, planning, preparedness, response, and recovery documents, and providing oversight to ensure compliance with existing and emergent state and federal regulations. Its main responsibility is emergency preparedness.
Incident Command Post	The location at which the primary command and control functions are executed.
Incident Command System	The nationally used, standardized, on-scene emergency management concept specifically designed to allow its user(s) to adopt an integrated organizational structure equal to the complexity and demands of single or multiple incidents without being hindered by jurisdictional boundaries. The Incident Command System is the combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure, with responsibility for the management of resources to effectively accomplish stated objectives pertinent to an incident.
Mutual Aid Agreement	Written or oral agreement between agencies or jurisdictions to assist one another on request, by furnishing personnel, equipment, or expertise in a specific manner without compensation.
Office of Correctional Safety	The Office of Correctional Safety (OCS) supports the mission of the California Department of Corrections and Rehabilitation. OCS’s mission is to protect the public and serve the department’s investigative and security interests.
State of California Emergency Plan	The State of California Emergency Plan, approved by the governor, which describes the principles and methods to be applied when carrying out emergency operations or rendering mutual aid during emergencies.

Source: Definitions generated by OIG auditing staff.

Introduction

California Penal Code section 6126(b) authorizes the Office of the Inspector General (the OIG) to conduct an audit of the California Department of Corrections and Rehabilitation's (the department) policies, practices, and procedures. We initiated this audit after receiving concerns about the department's disaster response and assessment of the risks to departmental staff and the incarcerated population from natural disasters including wildfires, floods, and earthquakes.

During this audit, we reviewed the department's specific policies, procedures, and mandated staff training implemented to prepare for and respond to wildfires, floods, and earthquakes, its coordination with federal, state, and local entities to respond to those natural disasters, and its efforts to improve emergency response protocols. In addition, we specifically assessed the department's ability to evacuate prisons threatened by wildfires, floods, and earthquakes.

We also evaluated the 2024 emergency operation plans from 30 prisons in California to determine compliance with applicable law, departmental policy, and industry standards.¹ We then reviewed three prisons in depth, based on their assessed vulnerability to natural disasters: Valley State Prison (Valley State) in Central California; California Rehabilitation Center (CRC) in Southern California; and San Quentin Rehabilitation Center (San Quentin) in the San Francisco Bay Area. We reviewed the prisons' methods used to assess their individual risks for wildfires, floods, and earthquakes, their documented mitigation plans, and whether they revised and improved policies or procedures in response to the threat of natural disasters. Finally, we reviewed the adequacy and management of on-site supplies of emergency essentials at the three prisons.

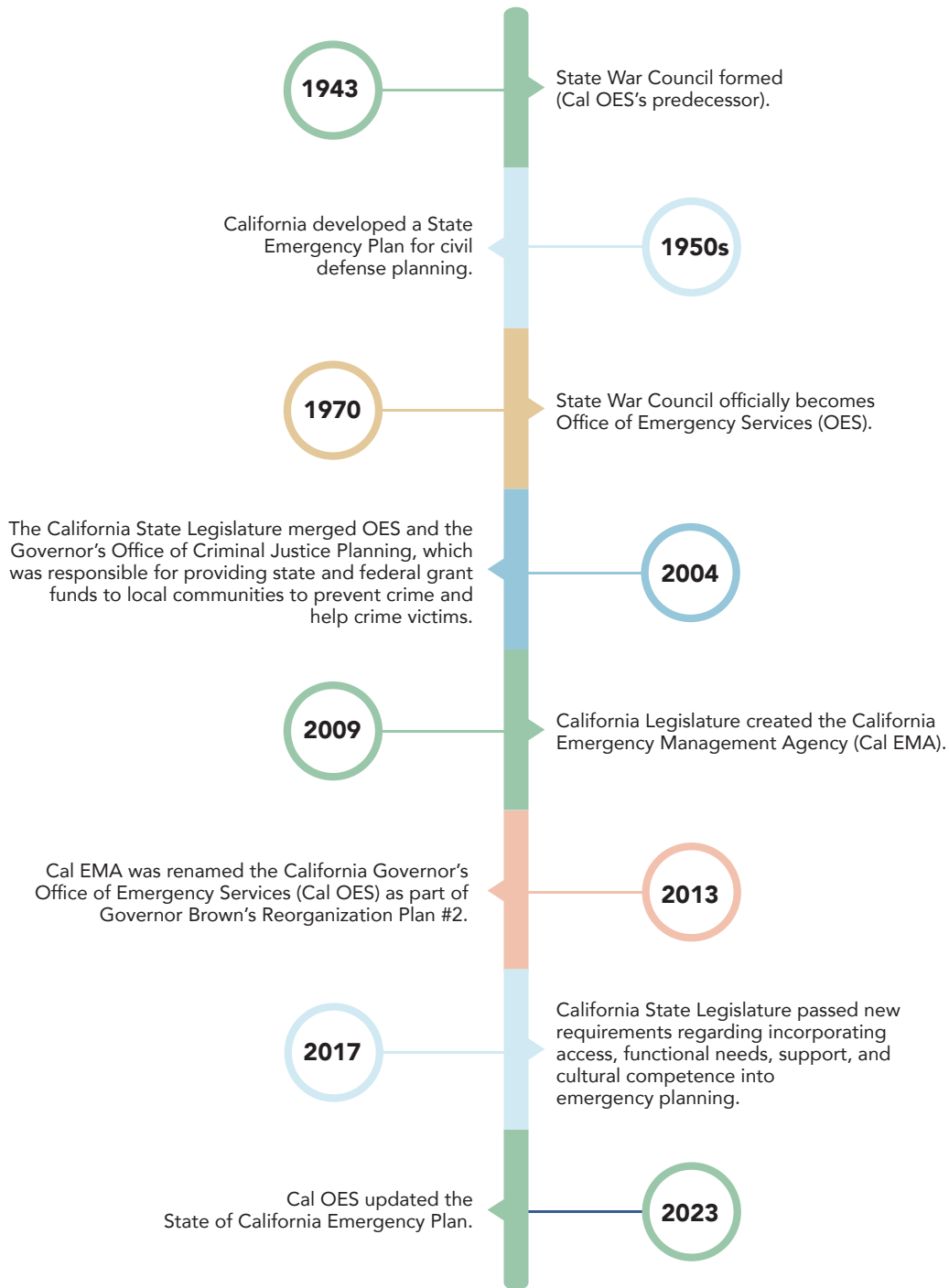
Background

California Statewide Emergency Mitigation and Response

According to the U.S. Department of Homeland Security, "natural disasters . . . have the potential to pose a significant threat to human health and safety, property, critical infrastructure, and homeland security." California is the most disaster-prone state in the nation, vulnerable to wildfires, floods, and earthquakes across its diverse geography. As we show in Figure 1 below, multiple state entities have been established over the years while California evolved its emergency response planning efforts.

1. We only reviewed 30 site-specific emergency plans because one of California's 31 prisons did not submit a plan in 2024.

Figure 1. Time Line Outlining the Development of Emergency Services in California



Source: Cal OES website.

What is now the Governor's Office of Emergency Services was established in 1970 to coordinate statewide emergency preparedness, post emergency recovery and mitigation efforts, and the development, review, approval, and integration of emergency plans. Multiple agencies and offices responsible for emergency preparedness and response were subsequently established, reorganized, and merged into the renamed Governor's Office of Emergency Services (Cal OES) in 2013.

Cal OES serves as the state's leadership hub during all major emergencies and disasters and is responsible for responding to, directing, and coordinating federal resources, state resources including departmental resources, and mutual aid assets across all regions during an emergency. Cal OES also supports local jurisdictions and communities through planning and preparedness activities, training, and facilitating the immediate response to an emergency through the longer-term recovery phase.

In 2017, Cal OES released the State of California Emergency Plan, which in part describes the methods for conducting emergency operations. Essential elements of the plan include describing the emergency services provided by governmental agencies and how resources are mobilized, outlining the methods for carrying out emergency operations, and describing the process for rendering mutual aid. State law requires Cal OES to update the State Emergency Plan every five years. Cal OES last issued a new edition of the State Emergency Plan in 2023.

In 2023, Cal OES also formally adopted the 2023 California State Hazard Mitigation Plan. In it, Cal OES included some of California's hazard history, which since 1950 has included 365 State-of-emergency declarations, 337 Federal-disaster declarations, over 900 deaths, and over \$20.7 billion in State-administered costs. Cal OES also noted that from 2018 through 2023, California experienced some of the largest and most destructive natural disasters in the State's recorded history, and that disasters are becoming more frequent and resulting in greater impacts—a trend expected to increase with population growth and climate change.

The Department's Emergency Response Plan

Beginning in 2012, the department implemented an emergency response plan in phases which was reportedly consistent with California's then statewide plan. The department's All-Hazards Emergency Operations Plan (emergency plan) was intended to enhance the department's ability to prepare for, respond to, mitigate, and recover from all emergencies and declared disasters involving prisons and other departmental property.

The emergency plan, which was developed using subject matter experts and best practices from correctional agencies around the country, defined procedures, outlined staff roles and responsibilities, and required

each prison to develop site-specific supplements² that describe site-specific implementation activities that complied with the emergency plan. Each prison was responsible for assessing its unique risks from natural disasters and creating a site-specific emergency plan to mitigate those risks to recover from natural disasters that could significantly disrupt the prison.

The Emergency Planning and Management Unit (emergency planning unit) within the department's Office of Correctional Safety has oversight responsibility over the emergency plan and must approve each prison's site-specific emergency plan. Prisons submit their site-specific supplements along with their site-specific emergency plans to the emergency planning unit. The department's emergency planning unit is staffed by five employees: one manager, two instructors, one continuity of operations analyst, and one emergency services coordinator.

It is important to note that the emergency planning unit does not conduct an independent risk assessment of natural disaster threats facing each prison but rather relies on the risk assessments conducted at each site. Prison wardens are required to review and revise the site-specific plans and submit them annually to the emergency planning unit in June for review and approval. The emergency planning unit conducts training at prisons and makes suggestions on emergency planning during the training, as well as upon request.

The emergency planning unit is also responsible for facilitating the department's coordination with other agencies when responding to emergencies and ensuring that the department remains in compliance with state and federal emergency management regulations. Finally, the emergency planning unit serves as the liaison with Cal OES during both the activation and the recovery phases of emergencies.

The department began updating its emergency plan in 2023, but the update has not been finalized as of the publication date of this report. However, in 2024 the department implemented a single update to its 2012 emergency plan affecting the department's contracting process for obtaining supplies during emergencies.

Incident Command Post and Incident Command System

The department's emergency plan includes and follows nationwide standard communication processes and procedures to respond to emergencies. For example, prisons may activate an Incident Command Post in response to an emergency. The Incident Command Post is a location staffed by appropriate departmental personnel for the purpose of responding to emergencies including wildfires, floods, and earthquakes.

2. The department refers to site-specific supplements as restricted supplements, appendixes, and attachments, but for ease of readership we refer to them in this report as site-specific supplements.

In addition, an Incident Command System (ICS) is activated when an emergency requires additional resources or when the situation is expected to last for an extended period. The ICS is a standardized approach to managing incidents that coordinates the efforts of multiple personnel, organizations, and agencies. It is designed to be flexible, cost-effective, and scalable, making it suitable for a wide range of incidents, regardless of size or complexity. The system is structured around five main functional areas: Command, Operations, Planning, Logistics, and Finance/Administration. When the department activates the ICS, the Department Operations Center (DOC) at headquarters supports the prison's incident response by coordinating resources, providing executive-level guidance, and defining policies. While the DOC's primary role is coordination and support, command and control of the response remains with the prison.

In cases where an emergency exceeds a prison's capabilities due to its size, scope, or complexity, prison staff may request additional resources, such as an Incident Command Support Team. Prisons may also enter into local mutual aid agreements with other entities, either within the department or with outside organizations. These formal agreements between agencies—such as the federal government, local governments, emergency services, or other organizations—help ensure coordinated cooperation and support during emergencies.

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Results

Chapter 1. California's Overcrowded Prisons Are Vulnerable to Wildfires, Floods, and Earthquakes, and the Department Is Unable to Evacuate the Incarcerated Population and Staff at Most Prisons Within 72 Hours of an Emergency

The Department Does Not Have Specific Plans to Externally Evacuate Prisons in Response to Natural Disasters

Although the department and individual prisons have plans assessing the risks from and response to wildfires, floods, and earthquakes, those plans are general in nature and inadequate if large scale external evacuations are necessary. With the threat of natural disasters posing significant risks to life and property, inadequate preparations can lead to prison unrest, strained resources, and ineffective responses. California regulations mandate that each prison's site-specific emergency plan must include procedures for emergency evacuation, including evacuation types, exit routes, and personnel assignments to ensure the safety of staff during emergencies. In addition, regulations require prisons to have plans to respond to natural disasters, and departmental policy requires prisons to have external evacuation procedures.

However, while most of the site-specific emergency plans we reviewed included procedures to move the incarcerated population to and from locations within the prison, none included detailed plans to evacuate outside the prison gates. Instead, plans included general language about coordinating evacuation routes with departmental headquarters staff who would be responsible for determining where the evacuees would be transferred based on availability of temporary housing with appropriate security.

Although we acknowledge that coordination with departmental staff is critical and that local conditions cannot be predetermined, having no planned evacuation routes or temporary housing options could cause unnecessary delays during emergencies requiring quick evacuations. We found that the department lacks a viable and effective plan to timely evacuate the incarcerated population of most prisons immediately following a major natural disaster, particularly within 72 hours of an emergency.

Although departmental policy does not require prisons to have plans to fully evacuate prisons within 72 hours, we believe this window is reasonable when responding to a natural disaster. It is also supported by both the U.S. Department of Homeland Security, which emphasizes

prompt response and early warnings to save lives during emergencies, and the departmental evacuation plan we discuss below. The department's inability to accomplish evacuations within this critical window significantly increases the threat to the safety of incarcerated people and overall prison stability in the event of a natural disaster.

Prison Evacuations, Including the Evacuation of California State Prison, Corcoran, and the Substance Abuse Treatment Facility Will Likely Take More Than 72 Hours

The difficulty of planning and timely executing large-scale external evacuations was evident during the aftermath of above average rainfall in California during 2022 and 2023. In 2023, California experienced record breaking high levels of rain and snow that threatened to surge four rivers—Tule, Kings, Kaweah, and Kern—and breach levees, inundating the Tulare Basin—at the time, the largest freshwater body west of the Mississippi. Because California State Prison, Corcoran (Corcoran), and the Substance Abuse Treatment Facility are located near the Tulare Basin, they were determined to be at high risk of flooding if the levees protecting the area were breached. However, neither prison had detailed site-specific emergency plans that included external evacuations.

In response to the impending flood risk, the department assigned staff to develop a detailed evacuation plan in coordination with 19 crisis response teams: the department's statewide transportation unit, teams from the counties of Tulare, Kings, Riverside, and San Bernardino, the California Department of Water Resources, Cal OES, and other local stakeholders³. The resulting plan, which took weeks to prepare, was designed to evacuate the approximately 8,000 incarcerated people housed at Corcoran and the Substance Abuse Treatment Facility to other state prisons in 11 to 14 days, but the plan acknowledged that it could take longer.

The joint plan also stated that if the prisons were only given three days, or 72 hours, to evacuate due to imminent flooding, alternate evacuation sites would be used. This language suggests that a minimum of 72 hours is reasonable to evacuate a prison or prisons. While we recognize that Corcoran and the Substance Abuse Treatment Facility had the benefit of time to prepare the evacuation plan, it is unlikely the department was prepared to evacuate 8,000 incarcerated people in response to an imminent threat, particularly within 72 hours. Without the ability to quickly evacuate prisons, it is likely that wildfires, floods, and earthquakes will result in loss of life within the incarcerated population.

We believe 72 hours is a reasonable time frame to respond to emergencies demanding quick action. We arrived at this time frame

3. Other measures including reinforcing levees and utilizing portable barriers to protect the two prisons were also used in response to the potential flooding of Corcoran and the Substance Abuse Treatment Facility.

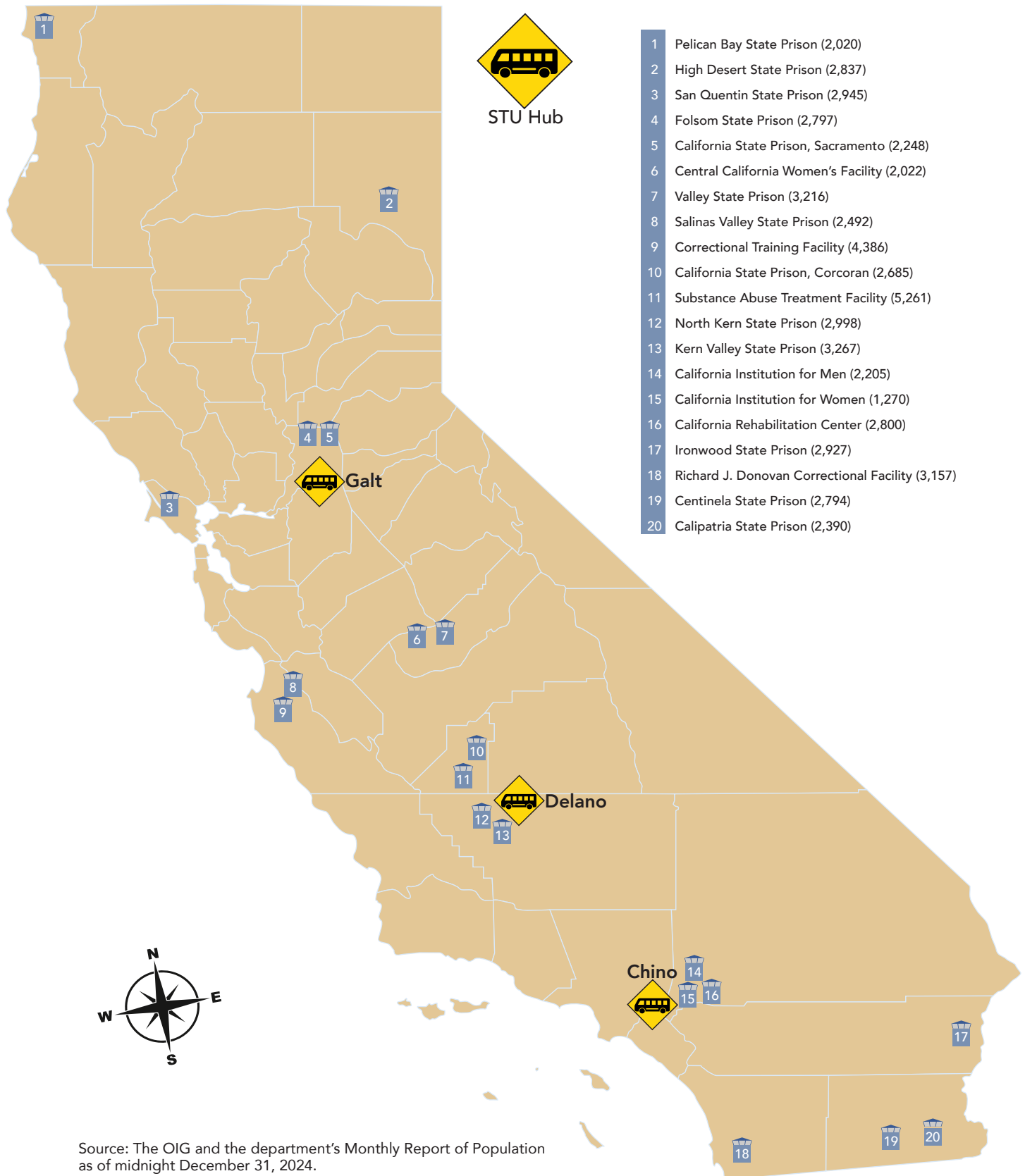
after careful consideration of several factors, including the unique environment of prisons, the logistics involved in evacuating the incarcerated population—particularly high-security risk individuals—and the operational requirements for a prison’s external evacuation. In addition, we considered how rapidly conditions can escalate during emergencies, especially wildfires. Although it did not directly impact state prisons, the 2018 Camp Fire in Butte County serves as a stark example of this rapid escalation. The fire consumed 90,000 acres by the day after it started, and within three days, the death toll had reached 23. Given this short timeframe, having a plan to evacuate a prison within 72 hours is not only reasonable, but necessary to ensure safety.

The Location and High Mileage of Transportation Buses and Other Fleet Vehicles Likely Limits the Department’s Ability to Evacuate Most Prisons Within 72 Hours

The department planned to use 22 buses from its Statewide Transportation Unit (transportation unit) to evacuate Corcoran and the Substance Abuse Treatment Facility, with two additional buses on standby in case of vehicle failure. The evacuation plan also stated it would take six days to evacuate wheelchair-bound individuals at a rate of 56 people per day. Furthermore, the plan suggested that it could take up to 24 hours for the transportation unit to gather and deploy fleet buses and other vehicles to even begin the evacuation.

As we show in Figure 2 below, the transportation unit operates 30 buses, each seating 38 people, from three regional hubs located in the cities of Galt in Northern California, Delano in Central California, and Chino in Southern California.

Figure 2. Map of California Displaying the Department's State Transportation Unit (STU) Hub Locations, Selected Prison Sites, and the Incarcerated Populations at Each Facility



In addition to buses, the transportation unit operates sedans, paratransit vehicles, and transport vans, which can seat from approximately seven to 19 people. In total, the transportation unit has approximately 93 fleet vehicles available across the state to evacuate incarcerated people during emergencies. The department may also have access to buses owned or operated by other state, local governmental, and private entities through mutual aid agreements we will discuss in greater detail later in this report.

While all departmental fleet vehicles throughout the state could be deployed to assist with an evacuation, the number of vehicles at each hub, and their proximity to prisons in the region, varies. As of January 6, 2025, the northern regional hub has 31 vehicles, including 11 buses that seat 38 people each; the central hub has 37 vehicles, including 12 buses that seat 38 people each; and the southern hub has 25 vehicles, including seven buses that seat 38 people each. Consequently, if a natural disaster necessitated evacuating San Quentin Rehabilitation Center, the closest departmental fleet vehicles not permanently located at the prison or at a nearby prison are in Galt, approximately 90 miles away. The closest available departmental fleet vehicles that could be used to evacuate Pelican Bay State Prison, not stored at the prison or a nearer prison, are approximately 400 miles away. While the department has personnel to staff a 24-hour a day evacuation effort, the distances between hubs and prisons potentially needing external evacuation can be great, which limits the department's ability to quickly evacuate.

Finally, the reliability of some departmental fleet buses is questionable. While we recognize that the department maintains its vehicles, some have notably high miles. For example, one of its fleet buses has been driven almost 533,000 miles. One fleet bus has approximately 676,000 miles logged, and five have between 730,000 and 858,000 miles logged. According to the U.S. Department of Transportation, the expected lifespan of large heavy-duty buses similar to those used by the department with a seating capacity of 39 to 47 passengers, is 500,000 miles. Therefore, it is possible the high mileage logged by these seven fleet buses could impair the department's ability to respond to large-scale evacuations.

Overcrowding and the Proximity of Neighboring Prisons Roughly Doubles the Incarcerated Population to Be Evacuated During an Emergency

In addition to the challenges associated with the locations of transportation unit vehicles and their high mileage, the department's ability to timely and effectively respond to large-scale emergencies is further complicated by prison overcrowding. As of December 31, 2024, California prisons were operating at 122 percent above designed capacity, housing an additional 16,263 individuals. Overcrowding not

only complicates the department's ability to manage emergencies, but also greatly exacerbates its inability to evacuate incarcerated populations if necessary.

In addition, the proximity of neighboring prisons increases the likelihood that multiple facilities would be affected by the same natural disaster, requiring a coordinated evacuation of their populations and staff. For example, Corcoran and the Substance Abuse Treatment Facility are adjacent to one another. Their entrances are located two miles apart, with a combined incarcerated population of 7,946 as of December 31, 2024. Both facilities currently operate at 140 percent of their design capacities, presenting a significant challenge to coordinating a large-scale evacuation of incarcerated people and staff as described above.

Other examples of adjacent facilities include Folsom State Prison (Folsom) and California State Prison, Sacramento (Sacramento), which have a combined overpopulation of 141 percent, and North Kern State Prison (North Kern) and Kern Valley State Prison (Kern Valley), located just 2.3 miles apart, with a combined overpopulation of 129 percent. Because of overcrowding, 1,472 additional incarcerated people, for a total of 5,045 individuals, would have to be evacuated from Folsom and Sacramento if it became necessary. Meanwhile, an additional 1,415 individuals, for a total of 6,265 individuals, would have to be evacuated from North Kern and Kern Valley. Overcrowding, coupled with prisons located near each other, are factors that complicate external evacuations, emphasizing the need to be as prepared as possible to respond to natural disasters.

Effective Plans to Evacuate Prisons in 72 Hours Are Particularly Important in the Event of Earthquakes

According to Cal OES's hazard mitigation plan, California has experienced 19 earthquakes of a magnitude five or greater from April 5, 2018, through January 2, 2023. While floods and wildfires may afford the department some time to prepare evacuation plans, earthquakes can strike without warning. They can also have a cascading impact that can trigger other hazardous events such as surface fault ruptures, wildfires, liquefaction, landslides, tsunamis, dam or levee failures, and power outages. Therefore, it is especially important for the department to have specific plans to timely evacuate prisons affected by earthquakes.

The risk that a prison will have to be evacuated because of an earthquake is not so minor or remote that it can or should be ignored. Of the 30 site-specific emergency plans for 2024 we reviewed, 21 prisons rated their risk from earthquakes as high, one prison rated their risk as moderate to high, and four prisons rated their risk as moderate or medium. Only one prison rated their risk from earthquakes as low. Because of the

substantial risk from earthquakes, detailed plans to evacuate prisons within 72 hours of an earthquake could prevent unnecessary and avoidable loss of life.

The Department May Not Evacuate Prisons in the Event of a Wildfire

The frequency and intensity of wildfires in California has increased significantly over the past two decades due to factors such as climate change, drought, and population growth in fire-prone areas. Wildfires are now regular events that require emergency evacuations. From 1980 through most of 2024 (as of November 1, 2024), California experienced 46 confirmed weather and climate disasters, including 19 wildfires, each causing damages exceeding \$1 billion. As previously highlighted in this report, the 2018 Camp Fire serves as a striking example of how quickly disasters can escalate. Within a day of its start, the wildfire had consumed 90,000 acres, and by the time it was fully contained, the number of fatalities had risen to 85, and more than 18,000 structures were destroyed.

To help reduce the risk of damage and loss of life, the department maintains fire engines and employs approximately 130 fire personnel. There are also approximately 150 incarcerated firefighters at 23 institutional fire houses and 1,011 incarcerated firefighters at 36 fire camps to protect prisons and fight wildfires statewide. In addition, departmental staff and incarcerated firefighters may perform controlled burns or other mitigation measures at prisons to reduce the fire risk to individual prisons. Despite these measures, wildfires have come close to at least four prisons in the last seven years. In 2018, the Nelson Fire threatened the California Medical Facility in Vacaville, and by one report, came within one mile of the prison's minimum-security yard. Smoke from the wildfire required incarcerated people to be moved from the minimum-security yard to another part of the prison, but the prison did not evacuate the incarcerated population off prison grounds.

Likewise, in 2021 the Dixie Fire burned near Susanville and impacted both the California Correctional Center and High Desert State Prison (High Desert). High Desert's then warden stated that the prison was "prepared to shelter in place with food stock on hand and up to date contingency plans for staffing shortages and/or fire evacuation (all-hazards)." Although High Desert was forced to run on generator power from July 21, 2021, to at least August 18, 2021, the fire did not come close enough to force an evacuation. Because the California Correctional Center was deactivated in 2023 and a report of the incident was not prepared, we have no records of its response to the emergency.

Finally, in 2023 the Smith River Complex Fire came close to Pelican Bay State Prison (Pelican Bay) in Crescent City. Pacific Power de-energized all power lines resulting in a major power outage for Pelican Bay.

Unlike High Desert and the California Medical Facility, Pelican Bay prepared a plan to evacuate staff and the incarcerated population totaling 1,550 after significant impact from wildfire, smoke, and the possibility of a prolonged power outage caused the prison to activate an incident command post. However, the evacuation plan was not completed until seven days after the incident command post was activated. Therefore, it is unlikely that Pelican Bay could have evacuated its incarcerated population within 72 hours.

While wildfires have not forced evacuations of any California prisons, other states have not been so fortunate. In 2013, the Colorado Department of Corrections (Colorado) was forced to undertake the difficult task of evacuating one prison with inadequate ventilation primarily in response to fears that smoke from a wildfire would adversely impact the older incarcerated population. The evacuation took approximately 27 hours and relocated approximately 900 incarcerated people to a facility less than seven miles away. However, the evacuation took place under favorable conditions including having a vacant prison close by, 12 hours advance notice, an abundance of resources because civilian evacuations were unnecessary, and the availability of nearby buses and vans from Colorado's transportation unit. Notably, Colorado at times maintains depopulated facilities in case they need to repopulate or reactivate them, but those prisons can also be used as temporary evacuation sites during emergencies. The prison evacuees were transferred to such a facility with the assistance of local law enforcement entities that provided security during the transfer. Colorado's successful evacuation of one relatively small prison under favorable conditions further emphasizes California's need to better plan for emergency evacuations of its prisons.

While a wildfire prompted Pelican Bay to prepare a plan to evacuate its incarcerated population, California prisons may be less likely to evacuate in response to wildfires than it would in response to other natural disasters. According to the department's fire chief, departmental resources, as well as resources from outside entities through mutual aid, would likely be channeled into stopping the wildfire rather than to evacuations. In fact, calls from outside entities to prisons to discuss evacuations—which are not always possible and would take longer to organize—tend to create panic, especially in nonfire personnel, according to the department's fire chief. Consequently, he believes sheltering in place is generally the best option because evacuations are likely to be logistically impossible, and because the incarcerated population would be subjected to potential harm from heat, dehydration, and smoke during an evacuation.

According to the fire chief, because smoke is the greatest threat during a wildfire, it is important that all prisons maintain an adequate supply of N95 respirator masks for both staff and the incarcerated population. Each prison is responsible for stocking and rotating its supply of N95 masks because the masks typically have a five-year shelf life.

Based on our review of departmental processes and procedures, the department is ill-prepared to timely and effectively respond to wildfires, floods, and earthquakes. We recognize that no amount of planning will be effective or prevent loss of life and destruction of property in all emergencies. However, given the increasing likelihood of natural disasters in California due to climate change, it is increasingly urgent that the department develop a comprehensive strategy for planning and implementing large-scale prison evacuations to save lives during emergencies. Furthermore, it is imperative that the department develop and require training for prison staff, to ensure prisons can effectively implement their site-specific emergency response plans, including large-scale prison evacuations.

Recommendations

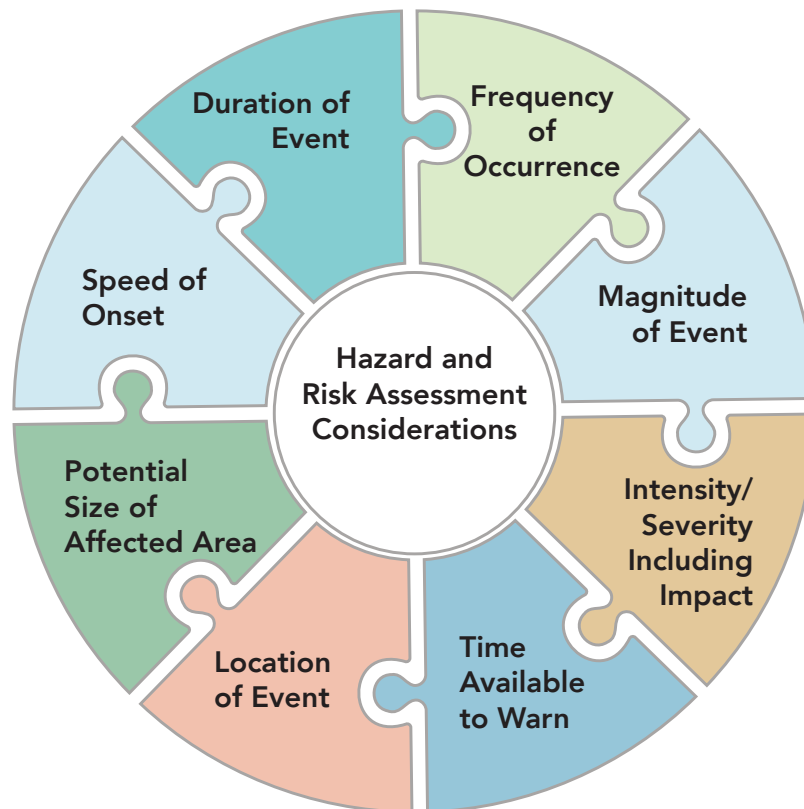
- The department should update its All-Hazards Emergency Operations Plan.
- The department should require prisons to develop and implement site-specific emergency evacuation plans that include detailed procedures and evacuation routes to externally evacuate staff and the incarcerated population within 72 hours.
- The department should identify and designate alternative temporary relocation sites near each prison to use during emergency evacuations, including deactivated prisons when applicable.
- The department should consider relocating current transportation hubs or adding additional transportation hubs to place fleet vehicles closer to more prisons to facilitate deployment in emergency evacuations.
- The department should develop training to prepare prison staff to plan and timely execute large-scale external evacuations of prisons.
- The department should require prisons to create and maintain defensible space around prison buildings to mitigate fire risk.
- The department should consider requiring prisons at moderate to high risk of wildfires to have fire retardant available to help reduce the probability of housing units catching on fire.

Chapter 2. Although Almost All Prisons Assess Their Risk of Natural Disasters, They Do Not Do So Consistently

Prison Staff Generally Use Multiple Methods to Assess Their Risk of Wildfires, Floods, and Earthquakes

To ensure prisons are prepared for natural disasters, departmental policy implemented in 2012 requires wardens to determine their prison's level of risk relative to potential hazards and vulnerabilities by assessing multiple considerations, including the probability and magnitude of the threats. Figure 3 below shows all elements of the department's risk assessment process.

Figure 3. Elements of the Department's Hazard and Risk Assessment Process



Source: The department's All-Hazards Emergency Operations Plan.

With knowledge of the specific risks to which prisons are most susceptible, prison staff can develop strategies to reduce those risks and ensure they are properly prepared to prevent and respond to natural disaster emergencies.

We reviewed the 2024 site-specific emergency plans from 30 prisons and found that all stated that staff conducted or planned to conduct an all-hazard assessment, but prisons used different methods to conduct the analyses. For example, 18 prisons stated they used the Automated Critical Asset Management System or other assessment tool, six prisons used an Emergency Planning Unit Hazard Vulnerability Assessment Tool, one prison used the United San Diego Emergency Services Organization assessment process, and five prisons did not specify which assessment tools they used. However, because the department does not require prisons to attach the assessment analysis to their site-specific emergency plans, the department cannot easily review the prisons' risk assessments to ensure compliance with departmental policy.

Using Multiple Risk Assessment Methods Likely Results in Inconsistent Risk Ratings Between Prisons

To better understand how prisons rated their risks from natural disasters in 2024, we requested copies of the risk assessment process used to determine specific risk assessment ratings for the three prisons we reviewed in depth: Valley State, CRC, and San Quentin. From the documents we received, we found that each prison conducted their risk-assessments differently.

San Quentin conducted a comprehensive assessment using the Hazard and Vulnerability Assessment Tool which evaluates the probability of natural disasters, the impact of natural disasters on humans, property, and business, the prison's preparedness for natural disasters, and internal and external response to natural disasters. For example, the analysis rated the probability and impact of an earthquake on property and business as high. These high ratings were compounded by low ratings for preparedness and internal and external response, as assessed by the prison. San Quentin rated floods and wildfires at a lower risk of probability but with high property, and business impacts, as well as low preparedness and internal and external response. According to a departmental manager, prisons are not required to use the Hazard and Vulnerability Assessment Tool even though it is likely more comprehensive than other methods.

Valley State's emergency plan stated that it conducted a site-specific all-hazard assessment using the Hazard and Vulnerability Assessment Tool, the same tool used by San Quentin. However, the prison provided a printout of Cal OES's online hazard assessment tool in response to our request to review its risk assessment analysis. To use that assessment method, prison staff enter the prison's address into an online mapping

tool available on the Cal OES website. The Cal OES tool then generates a risk rating for various natural disasters. Even though it is expressly authorized under departmental policy, the Cal OES tool seemingly rates only the probability of the risks.⁴ The Cal OES tool, without additional analysis, does not comply with other departmental policy requiring prisons to analyze their preparedness and the potential impact of natural disasters, among other factors, beyond simply determining the probability of occurrence.

Like Valley State, CRC provided a printout of the Cal OES hazard assessment tool in response to our request for a copy of its risk assessment process. However, unlike Valley State, CRC's emergency plan did not specify which assessment process it used. Instead, CRC's emergency plan simply stated that it conducted a site-specific all-hazard assessment via the Automated Critical Asset Management System, or other assessment process, to determine its risk. CRC's emergency plan did not include a copy of its assessment, and as we stated earlier, departmental policy does not require its inclusion.

With prisons using different tools to assess and rate their risk of wildfires, floods, and earthquakes, the department cannot ensure prisons are thoroughly and accurately examining and assessing their risks. Moreover, without a robust standardized risk assessment process, the department cannot ensure suitable control measures are put in place to minimize the risks—especially high risks—to acceptable levels. This is particularly important because 15 prisons rated their flood risk as either high or moderate, 22 rated their wildfire risk as high or moderate, and 26 rated their earthquake risk as high, moderate to high, or moderate. Finally, the use of multiple methods to assess risk and the lack of departmental oversight may lead to incomplete analyses and inconsistencies when compared with assessments performed by neighboring prisons as we discuss below.

Some Prisons Rate Their Risks of Natural Disasters Differently Despite Being Located in Close Proximity to Each Other

We reviewed risk assessments for prisons located near each other to determine whether their risk assessments were consistent with each other and found that they were not. For example, Folsom rated its wildfire risk as moderate, its flood risk as high, and its earthquake risk as low, while California State Prison, Sacramento, which is adjacent, rated its risks from wildfires, floods, and earthquakes, as high. In another example, Kern Valley rated its flood risk as high while North Kern, 2.3 miles away, rated its flood risk as low.

4. Departmental policy authorizes prisons to reference risk assessment maps generated by Cal OES's predecessor. However, these maps are outdated, therefore, prisons use the updated mapping and risk assessment tool available on Cal OES's website.

Finally, Corcoran and the Substance Abuse Treatment Facility, located approximately two miles from each other, rate their flood vulnerability differently, with Corcoran rating it as low and the Substance Abuse Treatment Facility rating it as high. For neighboring prisons described above, we expected similar risk assessments. Without consistent risk assessments, prisons are not effectively laying the groundwork for comprehensive emergency preparedness strategies or tailoring emergency plans and resources to address identified threats.

Even more concerning, Corcoran continued to rate its flood risk as low in 2024 despite having been seriously threatened by flooding in 2023, as stated earlier in this report. Because departmental policy requires prisons to review and revise their site-specific emergency plans annually, we expected Corcoran, after just having been forced to prepare a detailed evacuation plan due to the threat of flooding, to have increased its flood risk rating from its low assessment in 2022 and 2023, to a moderate or high assessment.

Without a standardized process, neighboring prisons will likely continue to rate their risks of wildfires, floods, and earthquakes differently, and will not be able to identify opportunities to work together to mitigate shared risks as they would have to do in a real emergency. Consequently, to ensure prisons are prepared for future natural disasters, the department should develop a standardized risk assessment process to help prisons accurately assess their risk, to work cooperatively, and if feasible, to mitigate identified risks.

Recommendations

- The department should standardize risk assessment methodologies to ensure consistent and accurate risk ratings across prisons.
- The department should require adjacent prisons to work together to assess risks and develop mitigation strategies targeting those risks as part of their site-specific emergency plans.
- The department should enforce the inclusion of detailed, site-specific mitigation strategies in all emergency plans, particularly for identified high-risk areas.
- The department should develop a standardized process to ensure specific mitigation strategies are directly linked to wildfire, flood, and earthquake vulnerabilities at each prison.

Chapter 3. The Emergency Planning Unit Does Not Substantively Review Prisons' Site-Specific Emergency Operations Plans as Required by California Regulations and Departmental Policy

The Emergency Planning Unit's Approval Process Is Flawed

As previously discussed, California regulations require prisons to have site-specific plans approved by the emergency planning unit to prepare for and respond to natural disasters that could significantly disrupt operations. In addition, departmental policy requires wardens to ensure that their prison's site-specific plans are submitted annually to the emergency planning unit for review and approval.

While the emergency planning unit performs some review activities, such as verifying that each prison submits a site-specific plan and ensuring that certain documents are included with it, we found that the unit lacks formal guidelines or specific criteria to assess the content of the plans. Therefore, the emergency planning unit's review and approval process consists only of collecting site-specific plans and verifying that the plans contain the documents listed in the plans. It does not substantively review the content of the plans for completeness or accuracy.

According to the manager of the emergency planning unit, the unit does not substantively review site-specific plans because it does not have the authority or staff resources to do so. However, current regulations and departmental policy require the emergency planning unit to approve site-specific emergency plans. Consequently, the emergency planning unit seemingly has the necessary authority to establish a formal review process that includes specific criteria and requirements that prisons must meet to earn approval.

We acknowledge that the emergency planning unit only has five staff members and therefore may lack the resources necessary to substantively review site-specific plans as part of the approval process. However, because the emergency planning unit has not established a formal review process with specific criteria for approval, prisons' emergency plans and risk assessments are never reviewed for accuracy or completeness. In short, the department has no way of knowing if prisons have accurately identified the risks threatening the prisons and taken adequate steps to mitigate those risks. In addition, the department's lack of oversight has resulted in neighboring prisons submitting the inconsistent risk ratings we described above, further compromising the department's ability to prepare for and respond to natural disasters.

The Emergency Planning Unit Does Not Ensure Prisons Submit Site-Specific Supplements or Review Them for Adequacy

In addition to site-specific emergency plans, departmental policy requires prisons to develop site-specific supplements that address site-specific hazards not covered by the department's emergency plan. Departmental policy further requires prisons to review and revise the policy supplements annually or as needed based on specific incidents including disasters or disturbances. Although the emergency planning unit requires prisons to submit the site-specific supplements, it does not review them to assess their adequacy. As a result, prisons, like Corcoran as we described earlier, may fail to update their supplements regularly, even after significant events such as wildfires or floods, lowering their preparedness for future emergencies.

California regulations mandate that each prison's emergency plan must include procedures for emergency evacuation and specify evacuation types and exit route assignments to ensure the safety of staff during emergencies. In addition, departmental policy requires prisons to include response procedures in site-specific supplements that outline external evacuations. We found that the evacuation plans outlined in prisons' site-specific emergency plans and supplements, particularly Corcoran and the Substance Abuse Treatment Facility, showed significant gaps in detail and were missing critical information. In 2023, both Corcoran and the Substance Abuse Treatment Facility faced a flood threat due to record-breaking rainfall and snowfall. In response, they developed a joint external evacuation plan that included essential details such as the number of individuals to evacuate, the order and priority of evacuation, extraction modifications⁵ and transportation resources.

We recognize that some essential details, such as the number of individuals to evacuate, may vary from year to year and may not be included in an annual update to the site-specific supplements. Other details, such as extraction modifications during an emergency, once developed are something we would expect Corcoran and the Substance Abuse Treatment Facility to incorporate into their site-specific plans. However, neither Corcoran's nor the Substance Abuse Treatment Facility's 2024 emergency plans incorporated this level of detail in their external evacuation procedures, leaving their plans inadequate to address similar emergencies in the future.

We reached a similar conclusion after reviewing Pelican Bay's site-specific emergency plan and supplements. Although Pelican Bay developed an external evacuation plan in response to the 2023 Smith River Complex Fire—an event that led to the evacuation of the town of Gasquet (18.9 miles from Pelican Bay) and surrounding areas—its 2024 site-specific emergency plan and supplements were not updated

5. Extraction modifications are changes made to the department's procedures for the involuntary removal of an incarcerated person from an area.

to include details developed for the 2023 external evacuation plan. As a result, Pelican Bay's emergency plan still lacks sufficient detail to effectively evacuate staff and the incarcerated population in response to natural disasters.

Because the emergency planning unit has not established a formal process to substantively review and approve site-specific emergency plans and supplements, prisons may not be fully prepared for emergencies. Without formal guidelines and clear criteria for assessing the adequacy of these plans, prisons may submit outdated or incomplete site-specific emergency plans that do not completely or accurately identify the current risks unique to each prison. Furthermore, because site-specific emergency plans and supplements do not contain detailed external evacuation plans, prisons may be unable to timely and effectively evacuate staff and the incarcerated population in response to wildfires, floods, or earthquakes.

Recommendations

- The emergency planning unit should establish clear criteria, including external evacuation procedures, and implement a formal approval process for approving site-specific emergency plans and supplements, to ensure compliance with California regulations and best practices.
- The department should require the emergency planning unit to formally review all site-specific emergency plans using established criteria and approve only the site-specific plans and supplements that meet the established criteria.
- The department should require the emergency planning unit to visit prisons on a rotating basis to review the prison's risk assessments, to ensure the assessments are thorough and accurate, and to ensure that mitigation measures are in place.

Chapter 4. At Least Two Prisons Have Not Entered Into Mutual Aid Agreements, and Not All Site-Specific Emergency Plans Include Key Details of Mutual Aid Agreements

Mutual aid agreements are written or oral agreements between and among public agencies, community organizations, and private businesses committing to assist one another during emergencies. The specific aid outlined in the agreements is rendered upon request, and those providing emergency aid are not compensated for their services. Because parties to mutual aid agreements agree to furnish personnel, equipment, and expertise during emergencies, they provide a pre-established mechanism to obtain quick assistance in responding to natural disasters. For this reason, the department requires prisons to enter into mutual aid agreements to increase their ability to timely and effectively respond to emergencies.⁶

To further facilitate rapid response to emergencies, departmental policy requires that mutual aid agreements include key details including which entities are covered by the agreement, what goods or services are covered, and what limitations, if any, apply to the agreement. However, we found that at least two of the 30 prisons which submitted site-specific emergency plans in 2024 did not maintain any mutual aid agreements, and it was unclear from the plans of two others whether they had entered into mutual aid agreements.

The site-specific emergency plan of one of the prisons that did not maintain mutual aid agreements stated that, “meetings are held periodically with representatives from [the city] Police Department and local hospitals to ensure continuity of services and to address any problems that may be encountered.” However, the plan did not identify which local hospitals participated in the meetings or what was discussed in the meetings. Therefore, the department’s ability to coordinate an emergency response would be compromised because headquarters’ staff would be unable to quickly determine which hospitals the prison met with to ensure continuity and address problems.

Moreover, some prisons that maintain mutual aid agreements failed to attach them to their site-specific plans and failed to include key information about the mutual aid agreements in these plans. While departmental policy does not require mutual aid agreements be attached or key information be included in each prison’s site-specific emergency plan, we expected key components of the mutual aid agreements to be documented to expedite the mutual aid during an emergency. If key components of mutual aid agreements are missing or unavailable to departmental staff, their value during emergencies is diminished.

6. Prisons may alternatively enter in memorandums of understanding for the same purpose, but for ease of readership, we will refer only to mutual aid agreements in this report.

For example, one prison stated that it had entered into mutual aid agreements with local hospitals and a medical doctor, but did not identify specifically which local hospitals, or which medical doctor. Another prison stated in its emergency plan that mutual aid agreements were established with all local hospitals and local law enforcement agencies, but did not provide any additional information about the agreements. Without specifically naming or identifying the parties involved, what aid is being provided, or what limitations apply, mutual aid agreements, even if they have been formalized in writing, do not comply with departmental policy and their effectiveness during an emergency is greatly diminished.

To ensure that both prison and departmental headquarters staff can identify key details of mutual aid agreements, such as contact information for all parties, prisons should either include that information in their site-specific emergency plans or attach the mutual aid agreements to their plans. In addition, requiring a formalized and standardized process for establishing mutual aid agreements will better prepare prisons and departments to respond to natural disasters.

Recommendations

- Formalize all mutual aid agreements into written contracts that clearly define the terms, roles, responsibilities, contact information, authority, and scope of assistance to be provided by each party.
- Standardize the process for documenting and reviewing mutual aid agreements to ensure that agreements are clear, enforceable, and effectively address the needs of each prison during emergencies.
- Require mutual aid agreements to be attached to site-specific emergency plans or require details of the mutual aid agreements, such as contact information, be included in site-specific emergency plans.

Appendix

Scope and Methodology

California Penal Code section 6126(b) and (c) authorizes the Office of the Inspector General (the OIG) to initiate audits of the California Department of Corrections and Rehabilitation's (the department's) policies, practices, and procedures. This audit focuses on concerns about the department's disaster response and assessment of the risks to department staff and the incarcerated population from wildfires, floods, and earthquakes. The table below presents the objectives of our audit and the methods we used to address them.

We conducted this performance audit in accordance with 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 according to our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions according to our audit objectives.

A-1. Audit Objectives and Methods Used to Fulfill Them

Audit Objectives	Method
<p>1. Review the department's preparedness for wildfire, flood, and earthquake emergencies at prisons.</p> <p>a) Review and evaluate the department's plans, policies, and procedures to prepare for wildfires, floods, and earthquakes.</p> <p>b) Review and evaluate the department's coordination with local, state, and federal agencies to prepare for and respond to wildfires, floods, and earthquakes.</p> <p>c) Review and evaluate the department's wildfire, flood, and earthquake response training and preparedness programs for staff and the incarcerated population.</p> <p>d) Review and evaluate the department's natural disaster/ emergency response protocols, including communication systems, evacuation plans, and emergency supplies.</p> <p>e) Review and evaluate whether the department identifies and improves its emergency response plans based on after action reports, annual emergency plan reviews, and other post emergency evaluations by timely revising policies and procedures.</p>	<ul style="list-style-type: none"> • Reviewed relevant laws, rules, regulations, policies, and procedures related to the department's emergency response plans for wildfires, floods, and earthquakes. • Reviewed reports issued by the department in its State Leadership Accountability Act report. • Reviewed reports issued by federal and state agencies related to emergency preparedness and response. • Interviewed departmental headquarters staff and reviewed relevant materials, including the State Administrative Manual, the Department's Operations Manual, the Restricted Operations Manual, Correctional Safety Manual, training materials, and Climate and Disaster reports from news articles, academic research, and incidents. • After reviewing the department's emergency operations plans, we selected three prisons for fieldwork: California Rehabilitation Center, San Quentin Rehabilitation Center, and Valley State Prison. • Interviewed staff at California Rehabilitation Center, San Quentin Rehabilitation Center, and Valley State Prison and reviewed relevant local operating procedures and duty statements at each prison regarding their emergency response preparedness and plans.

(Continued on next page.)

A-1. Audit Objectives and the Methods Used to Fulfill Them (continued)

Audit Objectives	Method
<p>2. Review the department's efforts to mitigate the impacts of wildfire, flood, and earthquake emergencies on staff and the incarcerated population.</p> <p>a) Review and evaluate prisons' site-specific plans, policies, and procedures to prepare for wildfires, floods, and earthquakes.</p> <p>b) Review and evaluate whether prisons' site-specific plans identify and improve their emergency response plans based on after action reports, annual emergency plan reviews, and other post emergency evaluations by timely revising policies and procedures</p>	<ul style="list-style-type: none"> • Interviewed departmental headquarters staff and reviewed relevant materials, including the State Administrative Manual, the Department's Operations Manual, the Restricted Operations Manual, Correctional Safety Manual, training materials, and climate and disaster reports from news articles, academic research, and incidents. • Interviewed staff at each selected prison and examined relevant local operating procedures and staff training to assess their emergency preparedness. • Reviewed and analyzed supporting documentation, including wildfire, flood, and earthquake risk assessments, emergency supplies, and mutual aid agreements with local agencies and emergency responders at the three selected prisons.

Source: Compiled by OIG auditing staff.

Assessment of Data Reliability

The U.S. Government Accountability Office, whose standards our office adheres to for conducting and preparing audits, mandates an assessment of the sufficiency and appropriateness of computer-processed information used to support our findings, conclusions, or recommendations.

Throughout this audit, we relied on data provided by the department regarding emergencies at its prisons caused by wildfires, floods, and earthquakes, training schedules, emergency supplies inventory, and data published on the department's website regarding the incarcerated population. While we did not perform testing procedures to verify the accuracy of the data, we determined that it was reliable for the purposes of this audit.

The OIG's Comments Concerning the Response Received From the Department

The department received a draft of this report prior to publication and was given the opportunity to comment. Although we received the department's response, we did not publish it with our report because the comments were primarily editorial in nature. Moreover, nothing in the response addressed our findings, conclusions, or recommendations; nor did the response provide any planned corrective actions. We did, however, consider the editorial changes the department requested and made edits where appropriate to provide clarity.

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**Audit of the California Department of Corrections
and Rehabilitation's Natural Disaster Emergency
Preparedness and Mitigation Efforts**

Audit Report N^o 24-01

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May 2025

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