Performance Audit of the City's Disaster Response

June 2025 | OCA-25-10

Finding 1

The City effectively managed the immediate emergency response to the January 22, 2024 storm using existing plans, but when recovery demands extended beyond the City's previous responsibilities, there were no clear plans in place to meet residents' needs.

Finding 2

The City does not have a plan to ensure it quickly and effectively communicates response and recovery information with all members of the public after a disaster.

Finding 3

The City's use of an incident management team worked well to respond to infrastructure damaged by the storm, but a lack of documented policies and staff training led to delays getting its response started.

Finding 4

Increasing staff training and tracking lessons learned from previous disasters can help the City prepare for future disasters.

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OCA

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The Office of the City Auditor would like to thank representatives from the following departments, offices, and organizations for their assistance during this audit:

- Mayor's Office and City Executive Team

- City Council Offices

- Office of Emergency Services

- Communications Department

- San Diego Fire-Rescue Department

- All other City departments we met with, listed in Appendix B

- All other government organizations, community groups, and non-governmental organizations we met with, listed in Appendix B

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Performance Audit of the City's Disaster Response

Why OCA Did This Study

On January 22, 2024, a historic storm flooded homes and businesses. Hundreds of personnel from the City mobilized to address the crisis. Assessing the effectiveness of the City's response will ensure it is prepared to respond to future disasters. Therefore, we conducted a performance audit with three objectives:

(1) Determine if the City's response to the January 2024 floods aligned with best practices;

(2) Determine if roles and responsibilities were clear between the City, the County of San Diego, and other stakeholders; and

(3) Determine if changes are necessary to the City's disaster preparedness efforts to respond effectively to and facilitate recovery from future major emergencies.

What OCA Found

Finding 1: **The City effectively managed the immediate emergency response to the January 22, 2024 storm using existing plans, but when recovery demands extended beyond the City's previous responsibilities, there were no clear plans in place to meet residents' needs.**

- The City effectively carried out the **initial response** to the January storm, responding to emergency calls and repairing City infrastructure.

- The City's planned response to residents' needs **did not align with expectations** of elected officials and community members.

Widespread Flooding Resulted in Extensive Damage to Homes and Businesses

Source: City of San Diego Communications Department.

- **Lacking a formal role and receiving inconsistent communication led City Council Offices to respond to affected residents' needs,** which sometimes conflicted with or confused operational response activities.

- The gap between the recovery activities planned by City operations staff and those expected by the Mayor's Office led Mayor's Office staff to step into operational decisions, causing some **confusion and frustration**.

- Emergency sheltering was provided as planned, but **expectations for non-congregate and long-term sheltering went beyond the City's historical responsibilities.** Elected officials, community organizations, and affected residents reported confusion and frustration with the care and shelter services provided.

- Because the City is responsible for ensuring care and shelter services meet City residents' needs, the City should coordinate with the County and Red Cross before the next disaster to **ensure City, County, and Red Cross plans will meet residents' care and shelter needs**.

- **Working with local organizations before disasters** happen can help the City build trust and establish clear expectations.

The Gap Between City Plans and Community Expectations Led to Confusion and Frustration

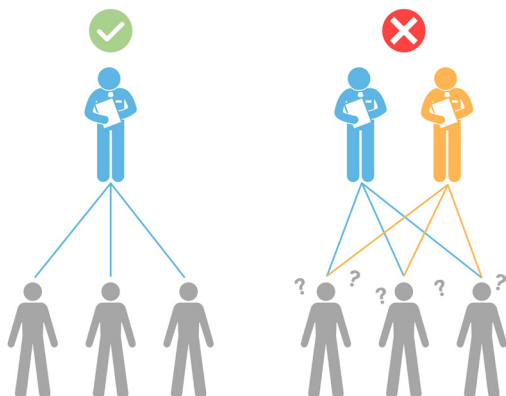Source: OCA generated based on interviews and document review.

Finding 2: The City does not have a plan to ensure it quickly and effectively communicates response and recovery information with all members of the public after a disaster.

- The City followed its Emergency Operations Plan, but the plan **did not account for communication challenges unique to floods** and the community affected, raising concerns that some residents were not getting needed information.

- The Emergency Operations Plan also did not account for communicating with residents in languages other than English, resulting in **flyers containing translation errors or inaccurate information.**

- The Mayor's Office wanted to approve public communication due to the sensitive nature of the event, but this process deviated from best practices and **caused some delays and confusion.**

Finding 3: The City's use of an incident management team worked well, but a lack of policies and training led to delays.

- The City's incident management team (IMT) worked effectively to coordinate efforts to respond to infrastructure damage, but it did not have a list of pre-identified staff to fill the positions, which resulted in delays, according to IMT leadership.

- The IMT received requests from policymakers that were **outside of or conflicted with the IMT's responsibility,** causing confusion and frustration among staff.

Individuals Within an Emergency Response Structure Should Only Have One Designated Supervisor

Source: OCA generated based on review of the National Management System and interviews with the City's IMT.

Finding 4: Increasing staff training and tracking lessons learned from previous disasters can help the City prepare for future disasters.

- There were several areas in which the Office of Emergency Services (OES) could improve its disaster planning and preparedness, but the identified areas **did not have a significant impact** on the overall flood response.

- These areas include expanding guidance on volunteer and donation management, updating the Emergency Operations Center roster, and implementing a system to **assign and track** emergency management **training for City staff**.

- OES does not have a policy to ensure it consistently drafts after-action reports or a way to ensure recommendations resulting from these reports are tracked and implemented.

What OCA Recommends

We made **23 recommendations.** Key recommendations include:

- Develop a **framework that clearly sets out the City's planned overall role** in disaster response and recovery.

- Clarify and provide training on the **roles of the Mayor's Office and City Council during disasters.**

- Create **a City-specific recovery plan** that establishes the responsibilities of City departments and external partners in disaster recovery, like providing care and shelter services and engaging with the community.

- **Update disaster communication plans to ensure they meet residents' needs,** including expeditious translations when needed.

- Develop policies for **mobilizing an incident management team** in an emergency.

- Continue to **develop a training program for City leadership and staff** on the on the City's emergency response protocol.

- **Track lessons learned** from previous disasters.

The City Administration **agreed to all 23 recommendations.**

For more information, contact Andy Hanau, City Auditor, at (619) 533-3165 or cityauditor@sandiego.gov.

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Background

On January 22, 2024, a historic storm brought heavy rain to the region, flooding homes and businesses, and prompting emergency declarations at local, state, and federal levels. In response, hundreds of personnel from the City of San Diego (City), alongside neighbors, community members, and dozens of community groups, mobilized to address the crisis. With the frequency of extreme weather events expected to increase, the City must assess the effectiveness of its response to ensure it is prepared to respond to future disasters. Therefore, we conducted a performance audit of the City's disaster response in accordance with the Office of the City Auditor's (OCA) Fiscal Year (FY) 2025 Audit Work Plan. The objectives of this audit were to:

1. In response to the January 2024 floods, determine if the City's overall disaster planning and preparedness efforts aligned with best practices and positioned the City to:

   a. Respond effectively, meeting the basic needs of affected residents, including those with functional and access needs;

   b. Facilitate recovery, including restored housing and economy;

   c. Coordinate with key stakeholders; and

   d. Communicate with policymakers, City leadership, and the public.

2. Determine if roles and responsibilities for response and recovery were clear between the City, the County of San Diego, and other stakeholders.

3. Determine if any changes are necessary to the City's disaster planning and preparedness efforts to respond effectively to and facilitate recovery from future major emergencies and disasters.

Record-breaking rainfall on January 22, 2024 led to extensive flooding.

On January 22, 2024, heavier rainfall than expected fell across the County of San Diego (County). Some areas of the City received up to 2.5 inches of rain in just 1 hour. Some of the hardest hit areas in the City were in Southeast San Diego, shown in **Exhibit 1**, including the neighborhoods of Encanto, Mountain View, Shelltown, and Southcrest. Several of the neighborhoods most affected by the floods were also neighborhoods the City identified as Communities of Concern—meaning the communities had higher rates of negative environmental and health risks, higher housing costs relative to income, and lower access to mobility prior to the storm.[1]

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1 The City's 2019 Climate Equity Index Report, in which the City identifies and discusses the methodology for determining Communities of Concern, can be found here: https://www.sandiego.gov/sites/default/files/2019_climate_equity_index_report.pdf

Exhibit 1

Southeast San Diego Had a Concentrated Number of Flooding Reports
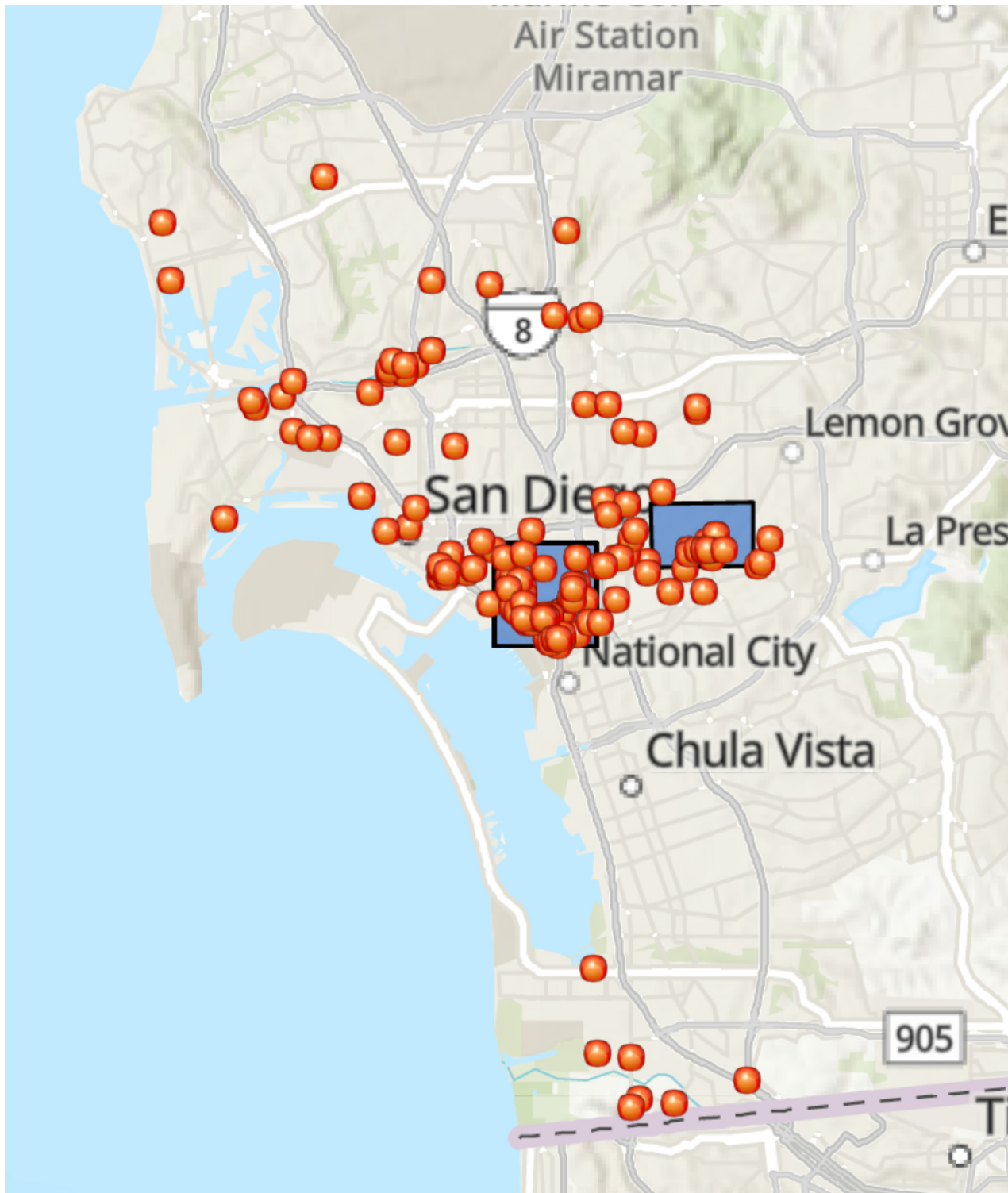
Source: Image obtained from the City of San Diego showing different flood-related reports, such as Fire-Rescue incidents or mud and debris clean-up.

According to the National Oceanic and Atmospheric Administration, this was a 1,000-year storm, meaning the amount of recorded rainfall had just a 1 in 1,000 (0.1 percent) chance of occurring in any given year. **Exhibit 2** shows some of the impacts from the storm.

Exhibit 2

Widespread Flooding Resulted in Extensive Damage to Homes and Businesses

Source: Images obtained from the City of San Diego Communications Department.

The storm caused widespread flooding, damaging homes, businesses, and infrastructure, such as streets and storm drains, and resulting in millions of dollars in public and private property losses. By the time the rain stopped that evening, the flooding had impacted more than 800 homes Countywide and, according to the City, caused an estimated $58.5 million in City infrastructure damage.

City staff worked for more than 180,000 hours to respond to and recover from the floods.

On January 22, 2024, the fourth wettest day in San Diego's recorded history, emergency calls to the San Diego Police and Fire-Rescue Departments reportedly resulted in more than 200 rescues from flood waters. In response to the growing disaster, the CIty's Office of Emergency Services (OES) activated the Emergency Operations Center to coordinate a Citywide emergency response. That same day, the Mayor declared a local emergency and requested disaster assistance funding from the Governor.

The City began clearing and repairing storm drains, flood channels, and damaged roads. To manage recovery efforts across different City departments, the City formed an incident management team, which also coordinated preparations for an upcoming storm forecasted to hit the area.

Beyond infrastructure repairs, City staff worked to support impacted residents. Examples of the efforts the City made to respond to and recover from the flood are discussed in **Exhibit 3** and the report findings.

Exhibit 3

The City Spent Millions of Dollars and Staff Worked More than 180,000 Hours to Respond to and Help Recover from the January 2024 Flood

$10.6 million in wages and benefits for more than 180,000 hours of City staff time spent on the response and recovery

$14 million in non-personnel costs like supplies and emergency contracts

$3 million to the San Diego Housing Commission for the Flood Recovery Program

$367,000 in grant money to 110 storm-affected local businesses and nonprofits

Source: OCA generated based on interviews with City staff and San Diego Housing Commission, a memo from the Mayor's Office, and SAP data.

Local government response was strengthened by state and national government agencies and non-governmental organizations.

The San Diego Housing Commission developed an emergency lodging program and reported sheltering 313 households.

Upon request from City Councilmembers, the **San Diego Housing Commission** developed an emergency lodging program and reported placing 313 households in emergency lodging in hotels from January 27 to February 12. The households were then able to transfer to the County's Emergency Temporary Lodging Program. Additionally, the commission created the Flood Recovery Program for Displaced Residents, which provided rental assistance, moving expenses, security deposits, or a one-time lump sum payment through funding from both the City of San Diego and the County of San Diego. The commission reported that through March 2025, it had aided 428 families with a total of $5.5 million in recovery funds.

The **County of San Diego (County)** managed disaster response and recovery in unincorporated areas and coordinated regional resources through its role as the Operational Area lead.[2] The County also managed the Crisis Track self-reporting tool to document estimated damage for state and federal assistance, coordinated state resources for the Local Assistance Center, and reported providing almost $20 million in funding for the Emergency Temporary Lodging Program, which served all flood-affected residents, including City residents.

Governor Newsom declared a state of emergency in San Diego County on January 23, 2024. According to the County's After-Action Report, the **State of California (State)** reported providing more than $170,000 in State Supplemental Grant Program funding to affected residents in the region. The funding covered expenses directly caused by the disaster, such as repairs and cleaning, household items, and transportation. The State also approved funding for local governments through the California Disaster Assistance Act, which reimburses government agencies for 75 percent of eligible costs related to the storm.

President Biden declared the flood a major disaster on February 19, 2024, unlocking federal assistance, such as the **Federal Emergency Management Agency's (FEMA)** Individuals and Households Program and Small Business Administration disaster loans. FEMA reported that

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2   Under State of California guidelines, the Operational Area means the intermediate level of the State's emergency management organization, which encompasses the county and all political subdivisions located within the county including special districts. The Operational Area manages and/or coordinates information, resources, and priorities among local governments within the Operational Area, and serves as the coordination and communication link between the local government level and regional level. In San Diego, these functions are administered by the County of San Diego's Office of Emergency Services.

FEMA reported it provided $27 million in recovery funds to affected residents.

it had approved 3,242 individual assistance applications for the region, totaling over $27 million in recovery funds to affected residents. To help survivors apply for financial assistance, FEMA reported that its representatives went door-to-door to impacted residences and opened two Disaster Recovery Centers. The region was not approved for FEMA's Public Assistance Program funding, which would have provided funding to local governments for response and recovery activities.

Non-governmental organizations and community members came forward to provide support and assistance to residents who were impacted by the floods. These organizations provided residents with shelter, meals, medical health screenings, and home remediation and repair work, among other assistance. According to the groups involved, examples of contributions included:

- The American Red Cross set up three emergency shelters, one at Lincoln High School, one in El Cajon, and one in Coronado, and provided food and health resources.
- The Legal Aid Society provided legal services to affected residents ranging from advice to full-scale representation for issues like mold, habitability, and eviction protection. The Legal Aid Society reported working on 187 cases within the City.
- The San Diego Foundation reported that it raised over $1.4 million, which supported nonprofits in providing food, clothing, and other essential items.
- Together with the Southeast Disaster Response Team, the Jackie Robinson YMCA reported receiving 2,500 donated items, securing emergency hotel lodging for 402 residents, providing over 3,000 meals, and filling and distributing 2,000 sandbags for protection from subsequent storms.[3] The group also reported that it canvassed the community and cleaned out damaged houses. The Jackie Robinson YMCA was also setup as a central response hub.[4]
- San Diego Voluntary Organizations Active in Disaster (VOAD) reported that it provided donations and long-term recovery case management after the January floods.[5]

The Jackie Robinson YMCA and its partners reported receiving 2,500 donated items, providing over 3,000 meals, and providing lodging for 402 residents.

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3   The Southeast Disaster Response Team is a coalition of local organizations, including but not limited to, the Harvey Family Foundation, the Jackie Robinson Family YMCA, Joint Initiatives for Radical Equity in Health (JIREH), PHATCAMP organization, Pillars of the Community, San Diego Hip Hop Health and Wellness 5K and Festival, and the Urban Collaborative Project.

4   Jackie Robinson YMCA reported that its partners also included Exhaling Justice, the San Diego Food Bank, and the Emo Brown Foundation.

5   San Diego Voluntary Organizations Active in Disaster (VOAD) helps prepare and coordinate member organizations through planning, providing public education, and responding to and helping communities recover from disaster. San Diego VOAD is a chapter of the national VOAD organization.

Exhibit 4

City Staff Helped Respond to and Recover from the Flood for Months After the Storm

January 22
- Storm arrives
- Fire-Rescue and SDPD respond to emergency calls and perform water rescues
- City sets up Balboa Park Activity Center for evacuated Alpha Project shelter residents
- City activates the Emergency Operations Center
- American Red Cross opens a shelter at Lincoln High School in Southeast San Diego
- Mayor Gloria declares the flood a local emergency

January 23
- County declares a local emergency
- Governor Newsom proclaims a state of emergency
- County launches Crisis Track and asks the public to report property damage

January 24
- City forms the Incident Management Team, combining staff from multiple operational departments to improve response coordination in heavily impacted areas

January 25
- City prepares for second storm forecasted to arrive January 31

January 27
- San Diego Housing Commission begins sheltering affected residents in an emergency hotel lodging program

January 28
- City opens three donation centers
- County opens a Local Assistance Center in Spring Valley

January 31
- Second storm arrives, City issues a flood advisory and evacuation warning
- City continues preparing for a third storm forecasted for February 4
- County closes Spring Valley Local Assistance Center

February 1
- Incident Management Team demobilizes

February 3
- City opens a Local Assistance Center at the Mountain View Community Center

February 4
- Third storm arrives, City issues flood advisory and evacuation warning

February 12
- County begins Emergency Temporary Lodging Program and families transfer from the San Diego Housing Commission's program to the County's program
- City's Local Assistance Center closes and transitions to an online resource hub
- City opens the Business Emergency Response and Resilience Grant to provide money to businesses and nonprofits in communities impacted by the storm

February 19
- President Biden declares the flood a major disaster

March 1
- FEMA opens Disaster Recovery Centers

April 2
- City deactivates its Emergency Operations Center

April 19
- FEMA Disaster Recovery Centers close

June 21
- County ends its Emergency Temporary Lodging Program

Source: OCA generated based on interviews with City staff.

Exhibit 4 shows a high-level timeline of events from the storm response and recovery.[6] The County's After-Action Report provides a detailed timeline of events.[7]

The Office of Emergency Services is responsible for operating the Emergency Operations Center in disasters.

The **Office of Emergency Services (OES)** is the City department responsible for activating, maintaining, and staffing the City's Emergency Operations Center, and for coordinating emergency activities within the City. In fiscal year 2025, OES had 19 budgeted staff and a budget of $3.9 million to coordinate emergency activities, as well as to complete non-emergency responsibilities like managing grants, updating emergency plans, leading training exercises, and meeting with external agencies on disaster preparedness.

The **Emergency Operations Center** is activated when there is an emergency and is made up of staff from across the City. It is used to support operational departments by collecting and distributing information, obtaining resources, and coordinating with other emergency response agencies. However, staff at the Emergency Operations Center do not actively manage incidents, leaving that to field operations staff like Fire-Rescue or Police Department personnel.

The City's EOP is modeled after the Operational Area EOP and the two entities must work together.

The **City Emergency Operations Plan (EOP)** outlines at a high level how the City will respond to emergencies like natural disasters, technological failures, acts of terrorism, or nuclear incidents. It explains how different emergencies will be managed, highlights key parts of the emergency response system, and defines who is responsible for protecting lives, property, and the community's overall safety and wellbeing. It contains several annexes that cover more specific topics like Care and Shelter, Evacuation, Environmental Health, and Infrastructure. As part of the State Standardized Emergency Management System described below, the City's EOP is modeled after the Operational Area EOP and the two entities must work together to effectively respond to and recover from disasters. The City's EOP is currently being updated based on the 2022 update to the Operational Area EOP.

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6   This timeline does not capture many of the activities performed by City and County staff, non-governmental organizations, and community members to help flood survivors recover. Additionally, in many cases, recovery can be a months- to years-long process, and many families are still recovering.

7   The County of San Diego's After-Action Report can be found here: https://www.alertsandiego.org/content/dam/alertsandiego/preparedness/en/aar/County%20of%20San%20Diego%20DR-4758-CA%20After%20Action%20Report_11.8.24.pdf

The City's EOP is designed to be compliant with both State and federal guidelines.

California's Standardized Emergency Management System is the foundation for how the State responds to emergencies and brings together all parts of the State's emergency response teams into one coordinated system.[8] The system establishes common features that apply to every level of emergency response and creates the system for aid requests. According to the Emergency Services Act, to qualify for State disaster reimbursement, local governments must use this system.

FEMA created the National Incident Management System as a structured way to handle emergencies.[9] It provides guidelines that can be used for any type of threat, hazard, or event, whether small or large. The system is designed to be flexible and adaptable for different situations. Agencies must use this system to qualify for federal preparedness grants.

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8   More details on California's Standard Emergency Management System can be found here: https://www.caloes.ca.gov/office-of-the-director/operations/planning-preparedness-prevention/planning-preparedness/standardized-emergency-management-system/
9   More details on FEMA's National Incident Management System can be found here: https://www.fema.gov/emergency-managers/nims

Finding 1

The City effectively managed the immediate emergency response to the January 22, 2024 storm using existing plans, but when recovery demands extended beyond the City's previous responsibilities, there were no clear plans in place to meet residents' needs.

Finding Summary

The January 22, 2024 storm flooded hundreds of homes and left affected residents, elected officials, and community groups expressing frustration for months afterward over the devastation and lack of coordinated restoration. At the same time, the City of San Diego's (City) operations staff over emergency response saw the City's response efforts as largely successful, citing the fact that Fire-Rescue Department and San Diego Police Department staff responded quickly to 9-1-1 calls, an emergency shelter was set up immediately, and City infrastructure was cleared and repaired quickly after the storm.

We found that the stark difference between the two groups' perspectives on the effectiveness of the response was largely due to a difference in expectations about the City's role. City operations staff expected to respond to meet residents' emergency needs and repair infrastructure, so they had a plan to do so prior to the storm and executed the plan effectively. The community and elected officials expected the City to do more, such as canvass the affected communities to learn residents' needs and provide longer-term, non-congregate shelter options, as shown in **Exhibit 5**.

However, because the City has not historically taken on these roles, the City did not have a plan to do so. As a result, the Mayor's Office and City Council Offices stepped up to identify and meet residents' needs, which helped the affected community, but also contributed to a disjointed response and caused some confusion among staff and residents.

Exhibit 5

The Gap Between City Plans and Community Expectations During the January 2024 Flood Response and Recovery Led to Confusion and Frustration
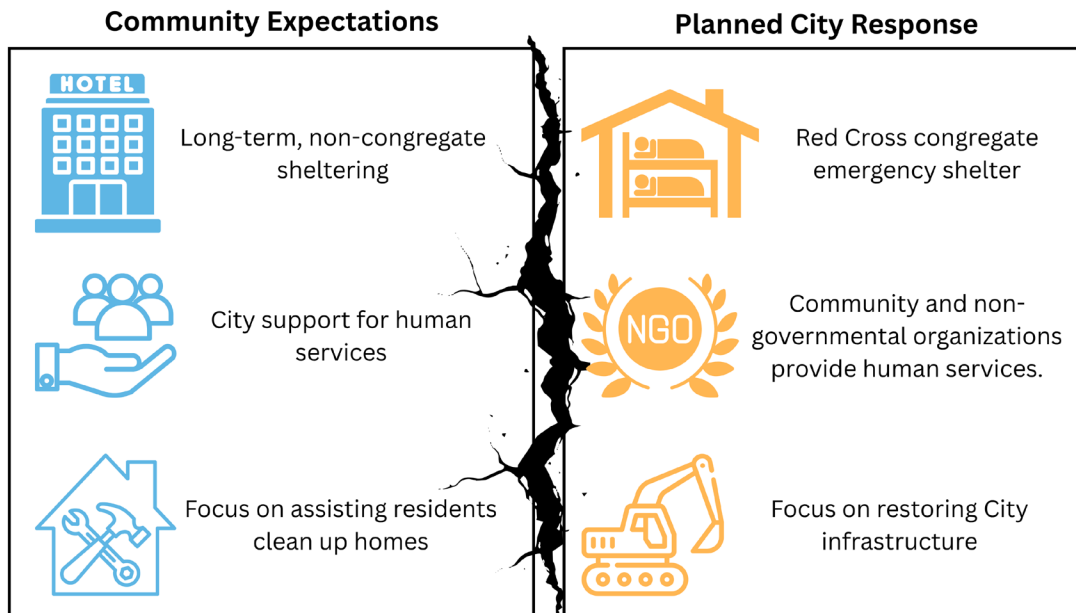
Source: OCA generated based on interviews with elected officials and review of the City's Emergency Operations Plan.

According to the Federal Emergency Management Agency (FEMA), actions taken after a disaster include response and recovery. Response includes actions to save lives and meet basic human needs. Recovery includes short- and long-term efforts to restore infrastructure, housing, a sustainable economy, and the health, social, cultural, historic, and environmental fabric of communities affected by a disaster. Response and recovery actions involve government at all levels, national non-governmental organizations, local community groups, and individuals. Although the City cannot restore a community by itself, it can have a plan to identify the affected community's needs and invite the key players to the table to meet those needs.

In preparation for future disasters, City elected officials should work with the community and other response organizations to determine what the City's role will be in disaster response and recovery, and what recovery work the City will expect others to undertake. Once City elected officials have set and communicated clear expectations, the City's operations staff should update its plans to meet those expectations.

The City effectively carried out the initial response to the January 22, 2024 storm, responding to emergency calls, carrying out water rescues, coordinating emergency shelter, and repairing City infrastructure.

On the day of the January 22, 2024 storm, the City responded swiftly and effectively, handling emergency calls and executing critical water rescues to ensure public safety. The San Diego Fire-Rescue Department reported that emergency calls on January 22 were three times higher than on a typical day, leading to hundreds of water rescues carried out by both Fire-Rescue and San Diego Police Department personnel. Officials said responders often prioritized public safety over their own safety that day. After the storm, an Assistant Fire Chief said at a City Council meeting that the response was "one of my proudest days in this position." **Exhibit 6** shows some examples of the work that City personnel performed both to respond to and recover from the storm.

Exhibit 6

City Crews Performed Emergency Rescues, Storm Channel Clean-up, and Debris Removal

Source: Images obtained from the City of San Diego Communications Department.

Early on January 22, the City's Office of Emergency Services (OES) activated the Emergency Operations Center and brought in staff from across departments to stay informed about the situation, keep in touch with other agencies, and support shelter and care efforts. One of the main tasks was moving hundreds of residents from a flooding Alpha Project Shelter to the Balboa Park Activity Center, where the City provided cots and emergency clothing.

During the following days and weeks, City staff across all departments worked tirelessly to respond and help the community recover from the devastating storm. OES staff led the creation of an incident management team, which coordinated City departments to clear streets and prepare for another forecasted storm. The Emergency Operations Center often had dozens of people from 22 City departments working in tandem to lead, manage, and support City operations in response to the flood.

Operational departments like the Environmental Services Department, the Transportation Department, and the Stormwater Department mobilized to clean up hazardous material, clear and repair roads, and fix damaged storm channels. Staff from the Parks & Recreation Department distributed sandbags and helped manage donations. Throughout all these activities, staff from OES managed the Emergency Operations Center and coordinated the City's response.

An EOC staff member said the response was "one of the best things I have ever done in my 34 years of work at the City."

City staff reported working extended periods without days off, through weekends, and under difficult conditions. The Mayor, City Councilmembers, the City's Executive Team, community groups, OES, and other City departments all praised the efforts of City workers. Many staff said in interviews the work was tough but rewarding. One Emergency Operations Center staff member told us responding to the storm was "one of the best things I have ever done in my 34 years of work at the City."

However, the City's planned response to residents' needs did not align with the expectations of elected officials and impacted community members.

While the City generally responded according to its existing emergency plans, the impacted community and City elected officials expected more services than the City had historically provided. The City's former Chief Operating Officer said the City's job after the January 22 storm was to clean up and repair infrastructure, which OES also emphasized. As discussed above, these tasks were completed.

However, community groups from the most affected areas did not feel as though the City's response met their expectations. Impacted community groups reported to City Council and in community meetings that they expected more support from government agencies, including the delivery of direct services like medical equipment and financial assistance, and to be made whole. Groups said that because of the history and unique barriers of the impacted community, conventional solutions would not be enough. Many impacted residents expressed feeling alone without government support, and community volunteers said they felt exhausted and disillusioned because they were severely under-resourced.

Additionally, the Mayor's Office and some City Council Offices said in interviews that the City did not do enough to meet the needs of impacted residents. These offices were concerned because there did not seem to be a plan to meet impacted residents' essential needs like access to their medicines, food, and long-term shelter, and that many of the elements that were important to the community, things like donation centers, pre-filled sandbags, and door-to-door canvassing, were not part of emergency staff's considerations. One office said that while they realized the City could not meet all needs of affected residents, they expected the City to do more to bring the philanthropic community together to help impacted residents with needs the City could not meet.

> *It is ultimately up to City policymakers to determine the City's level of involvement in recovery so that OES can plan and respond accordingly.*

Although there are elements of response that the City historically does not do, it is ultimately up to the City's policymakers to determine the level of the City's involvement in helping the community recover. Even if certain community needs have been beyond the City's scope in the past, policymakers should define what needs the City will address so OES can plan and respond accordingly.

The responsibility for responding to and recovering from disasters is shared by individuals, communities, non-governmental organizations, and various levels of government.

There is no one person or agency that is responsible for responding to and helping residents recover from a disaster in San Diego. Instead, response and recovery responsibilities are generally shared between individuals, communities, and different levels of government, as shown in **Exhibit 7**.

Exhibit 7

Responsibilities During and After an Emergency are Shared

Entity	Responsibilities During and After Emergency
City of San Diego	The City is responsible for managing all emergencies within its jurisdiction, as resources allow, and plans to: • Respond to emergency calls in the City, including responding to swift water rescues, helicopter rescues, and hazardous incidents. • Proclaim a local emergency. • Conduct law enforcement activities, including facilitating evacuation, controlling traffic, and establishing and providing security at shelters. • Communicate emergency information, including warnings and evacuations. • Address City infrastructure needs, including clearing City storm channels and streets. • Collect trash and debris. • Ensure the necessary and appropriate provision of care and shelter services to City residents, including coordinating with the American Red Cross and providing support for care and shelter activities as requested and feasible.[*] • Request resources necessary beyond its capabilities through existing mutual aid agreements.[**] • Perform damage assessments and keep records for reimbursements.
County of San Diego	The County of San Diego (County) responds to emergencies in the unincorporated area and: • Acts as lead response agency for public health, environmental health, coroner services, and terrorism response. • Provides emergency behavioral health intervention services and counseling support to those affected by the disaster in shelters, at Local Assistance Centers, and Emergency Operation Centers. • Assists with basic health screenings and replacing medication.
Operational Area (in San Diego, these functions are administered by the County's Office of Emergency Services)	In multi-jurisdictional events, or if requested by a jurisdiction, the Operational Area is responsible for: • Coordinating mutual aid within the Operational Area. • Collecting and sharing accurate, timely information to support response efforts, resource needs, and clear communication across agencies. • Aiding when local jurisdictions have exhausted their resources and request assistance. • Coordinating shelter operations in the Operational Area, including site selection, shelter opening and closing, and managing available resources for shelter sites.

	• Coordinating with region-wide non-governmental organizations like the American Red Cross. • Requesting State resources once local resources have been exhausted. • Requesting the Governor proclaim a state of emergency.
State of California	If the Operational Area activates its Emergency Operations Center, or by request, the State of California (State) is responsible for: • Responding to resource requests from Operational Areas and Regions.*** • Coordinating Statewide response and recovery resources, such as CalFire, the Department of Motor Vehicles, and the Department of Insurance. If the Governor proclaims a state of emergency, the State may: • Provide California Disaster Assistance Act funding, which provides State reimbursement to local governments for infrastructure repair costs related to disaster response. • Request a federal disaster declaration.
Federal Government	When the President declares a disaster, FEMA may: • Provide rental assistance, relocation assistance, and basic needs financial assistance to affected residents. However, FEMA's maximum award is only $42,500, and the award is not intended to make disaster survivors whole. • Open disaster recovery centers to assist with FEMA applications and co-locate with other disaster support partners, such as the Small Business Administration. • Provide funds for local governments if FEMA determines monetary thresholds for damage are met. • Coordinate federal resources, such as the U.S. Army Corps of Engineers, which may provide engineering and construction management expertise needed for recovery.
Non-governmental Organizations	Non-governmental organizations work independently and often offer specialized help to the entire community, for example: • The American Red Cross is congressionally mandated to provide mass care and shelter in disaster situations and has an agreement with the City to provide blankets, cots, comfort kits (basic toiletries), and meals to affected residents at its shelters. • The Humane Society is contractually obligated to provide small and large animal care and shelter services.

	• Other non-governmental organizations typically provide other services, such as:
	    o Voluntary Organizations Active in Disaster (VOAD) stated it typically provides volunteers trained in mucking out houses, volunteers for canvassing, and case management services for impacted residents.
	    o Salvation Army stated it typically provides food.
	    o The San Diego Foundation has created advisory councils after local disasters and fundraised to disseminate grant funds to local nonprofits helping affected residents.
	 Community-based organizations may also aid their neighbors through activities like fundraisers, collecting and distributing donated goods, providing shelter, providing meals, coordinating resources, and disseminating information.

Individuals and Households	To prepare for and respond during emergencies, individuals and households should: • Maintain flood insurance, which is the main source of recovery funding for impacted renters and homeowners. Flood insurance generally covers damage to the building and contents, including equipment and inventory for businesses and must typically be purchased in addition to home or rental insurance. • Prepare for emergencies by creating emergency kits and planning evacuation routes. • Stay informed during disaster scenarios.

* The function of mass care and shelter is to provide relief to people temporarily displaced by disasters, and relief may involve food, shelter, first aid and basic medical care, clothing, bulk distribution of basic household items, and care and shelter for household pets and service animals.

** According to the California Office of Emergency Services, mutual aid refers to the voluntary support provided by neighboring jurisdictions when an incident exceeds the affected area's ability to respond on its own. This assistance can include services and resources, such as fire, law enforcement, medical and health care, transportation, and more.

*** The Region level is the level of organization between the Operational Area and State levels and is responsible for coordinating information and resources within the region. The County of San Diego is in the Southern Region, which includes Imperial County, Los Angeles County, Orange County, and others.

Source: OCA generated based on information from FEMA, California's Standardized Emergency Management System, Emergency Operations Plans from the San Diego Operational Area and the City of San Diego, and interviews with City staff and external stakeholders.

The gap between the recovery activities planned by City operations staff and the recovery activities expected by the Mayor's Office led Mayor's Office staff to step into operational decisions, causing some confusion and frustration.

During the City's response, the Mayor's Office felt as if identified community needs, such as access to sandbags, donations, and clear information, were not being fully addressed by operations staff. As a result, Mayor's Office took on operational tasks, such as deciding the hours sandbags would be available to the public, determining where donation centers should be set up, and drafting bilingual flyers with community resource information. The Mayor's Office also reported that it had staff on the ground in the most affected communities daily who were working to collect information about residents' needs and share resource information. Mayor's Office staff said that the Emergency Operation Center's planned "traditional government response" was not enough and that the City needed to focus more on the community's needs.
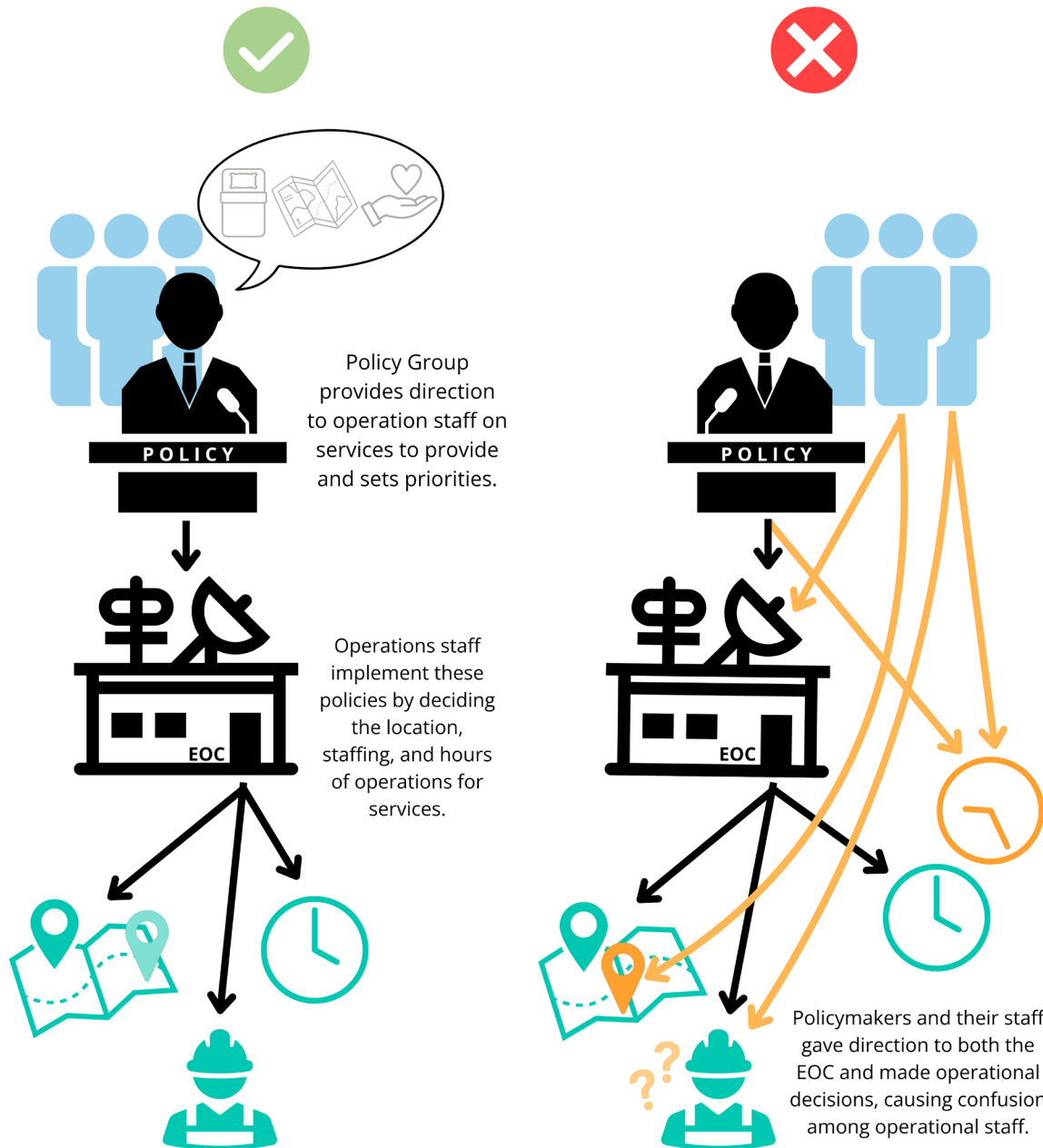
The Mayor's Office taking on operational tasks in addition to policy decisions created confusion.

While the Mayor's Office stepped up to meet the residents' needs it identified, the Mayor's Office taking on operational tasks in addition to policy decisions created confusion. During an emergency, the City's Emergency Operations Plan (EOP) says the Policy Group (Policy), is responsible for setting policies, priorities, and policy-level strategies.[10] The Emergency Operations Center staff then implement those decisions through operational tasks. For example, as shown in **Exhibit 8**, in an ideal structure, the Mayor's Office would broadly direct the Emergency Operations Center to establish donation centers and prioritize opening locations close to the most affected neighborhoods with extended hours. The Emergency Operations Center would then implement this policy direction by choosing the best locations and hours of operation, incorporating Policy's priorities and considering operational limitations, such as staffing resources or inclement weather.

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10 The City's Emergency Operations Plan states that the Policy Group includes the Mayor, the Chief Operating Officer, legal representation as needed, and "other key individuals."

Exhibit 8

The January 2024 Storm Response Did Not Follow the Ideal Structure, Where Operational Decisions are Made by the Emergency Operations Center with High-Level Input from the Policy Group

Policy Group provides direction to operation staff on services to provide and sets priorities.

Operations staff implement these policies by deciding the location, staffing, and hours of operations for services.

Policymakers and their staff gave direction to both the EOC and made operational decisions, causing confusion among operational staff.

Source: OCA generated based on interviews with elected officials and Emergency Operations Center staff and review of the City's Emergency Operations Plan.

According to Emergency Operations Center and Incident Management Team staff, by getting involved in operational decisions, Mayor's Office staff made decisions that did not fit the real-world conditions. Examples included locating a donation center at a location too close to

the affected area and at risk of flooding during the impending storm, and publicizing sandbag pickup times that did not match the planned schedule. To minimize operational conflicts in the future and ensure residents' needs are identified and met, the City should create a framework that broadly identifies the roles and responsibilities of the City and other relevant agencies prior to the next disaster.

The City should also formalize the role of the Mayor's Office staff in disaster response. During the January storm response, there was initially no formal role for Mayor's Office staff. Both Mayor's Office staff and operations staff said that as the January storm response progressed, communication and collaboration improved once the Mayor's Office was embedded in the Emergency Operations Center. Clarifying the role of the Mayor's Office staff in the Emergency Operations Center and providing training would ensure consistent communication and clarify the decision-making structure.

Lacking a formal role and receiving inconsistent communication led City Council Offices to respond to affected residents' needs, which sometimes conflicted with or confused operational response activities.

City Council Offices from heavily affected districts said they were not getting updated information and that the City was not meeting affected residents' needs. In response, Council Offices organized clean-up events, debris pickup, public meetings, and other activities to try and assist their constituents. However, operations staff reported that some of these Council-led activities conflicted with operations and that requests from Council Offices created confusion among responding staff. To ensure the City's response and recovery efforts meet residents' needs, the Mayor's Office should work with City Council to create a framework that outlines the broad roles the City does and does not expect to take on during disaster response and recovery and educate Council Offices and the public on which party is responsible for which activity.

The City's EOP says the Mayor's Office is responsible for keeping Council Offices informed. Some Council Offices said in interviews that they were not sufficiently informed and did not receive timely updates on the response and recovery actions the City was taking. Mayor's Office staff acknowledged that, while they were handling Council Office requests, the high volume of requests made it difficult to follow up, especially on requests that took operations staff several days to fulfill. However, another Council Office said it felt the lack of

> *One Council Office said the lack of information on emergencies was still an issue after the floods.*

information on emergencies was still an issue after the floods, such as with the wildfires near its district in January 2025. By establishing a communications procedure about emergency response activities, the Mayor's Office can let Council Offices know what to expect in terms of communication and ensure Council Offices receive accurate and timely information. This may also help limit conflicts between Council Office activities and operations' activities in future disasters.

For disasters, City Council does not have a formal role, outside of proclaiming and ratifying a local emergency and asking the County or Governor to declare an emergency. The International City and County Managers Association advises cities to establish clear roles and responsibilities between operations staff and elected officials to prevent confusion. Given their strong ties to constituents and community organizations, the City could formalize Councilmembers' role to serve as a valuable bridge between City staff and the public, helping to share information and identify community needs. Additionally, cities like Los Angeles, Oakland, and San Jose provide training and guidebooks for elected officials, explaining their roles, responsibilities, and key city contacts. Offering similar training and guidance could help City Councilmembers and their staff better understand their role and how their work fits into the City's emergency response efforts.

Emergency sheltering was provided as planned, but expectations for non-congregate and long-term sheltering went beyond the City's historical responsibilities.

On January 22, the American Red Cross (Red Cross) set up an emergency congregate shelter at Lincoln High School for people who had been impacted by the flood.[11] This followed policies in the City's EOP, which states that the Red Cross will provide mass care and sheltering services, including emergency lodging, food, assistance procuring prescribed medications lost in the disaster, and crisis counseling.

However, the shelter was sparsely populated. Many affected residents chose instead to stay in their homes or in hotel rooms paid for by local community organizations. Councilmembers and community

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11 Congregate shelters are shelters generally established in large, open settings that provide little to no individual privacy in facilities that normally serve other purposes, such as schools, churches, or community centers. In contrast, non-congregate shelters typically provide a higher level of privacy and may be established in hotels, cruise ships, converted buildings, or other facilities with private sleeping spaces.

organizations said that the congregate nature of the Red Cross shelter lacked privacy and did not provide affected families with the sense of safety and stability necessary for recovery. In response to City officials' requests, the San Diego Housing Commission created a program to shelter affected residents in hotels. On February 12, the County of San Diego (County) took over responsibility for sheltering affected residents and provided long-term, non-congregate sheltering primarily in hotel rooms through its Emergency Temporary Lodging Program. **Exhibit 9** shows a timeline of shelter and housing during the January 2024 flood response.

Exhibit 9

Multiple Agencies were Involved in Housing Displaced Residents in the Wake of the January 2024 Floods
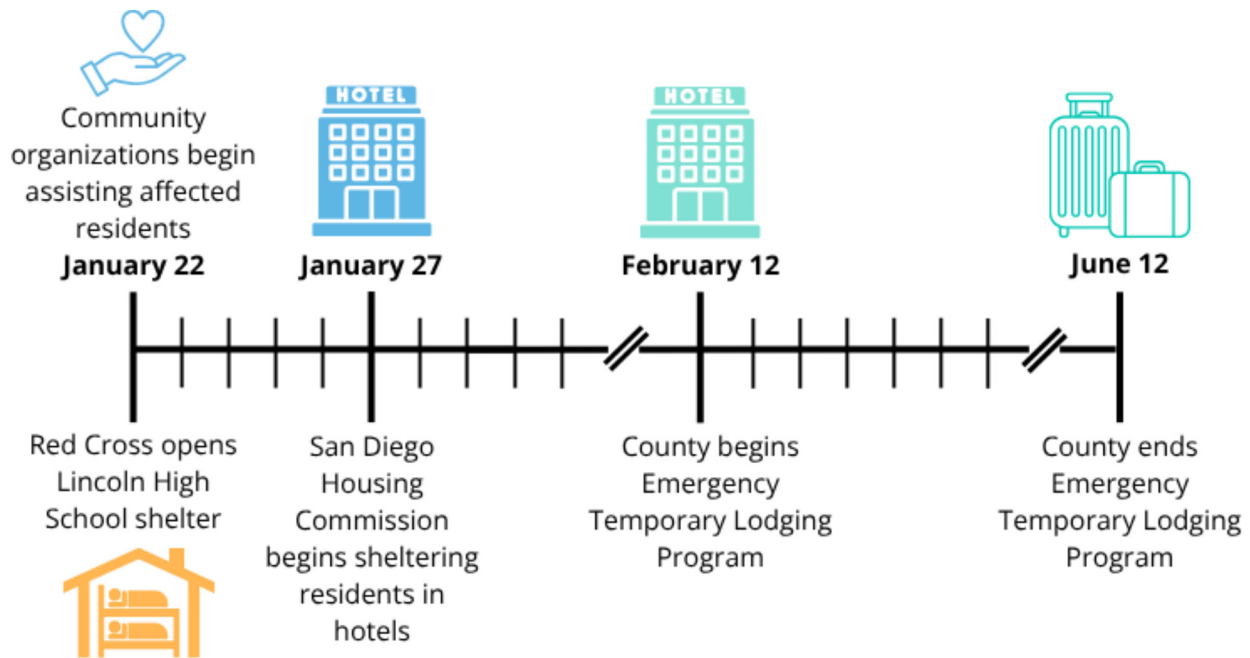
Source: OCA generated based on interviews with the San Diego Housing Commission and reviews of After-Action Reports.

The Mayor's Office, City Council Offices, community organizations, and affected residents reported confusion and frustration with multiple aspects of the care and shelter services provided.

- **Unclear who was in charge.** The Mayor's Office, Council Offices, and community members said in interviews that there was confusion about who was in charge of care and shelter for City residents. The Operational Area EOP states that during incidents that affect multiple jurisdictions, like the January storm,

> *The County and Red Cross were responsible for coordinating and providing care and shelter services.*

the County's Health and Human Services Agency has primary responsibility for overall coordination of shelter operations. The responsibility includes site selection, shelter opening and closing, and monitoring to ensure shelters meet residents' needs. Both the City's EOP and the Operational Area's EOP state that they rely primarily on the Red Cross to provide care and shelter services. Therefore, the County and the Red Cross were responsible for coordinating and providing care and shelter services.

- **Care needs were not being met.** Council Offices and community organizations said in interviews that affected residents' care needs were not being met. For example, Council Offices said there did not seem to be a plan to ensure affected residents received food and help replacing their prescribed medications. Several staff said the Red Cross volunteers at the shelter also did not seem prepared to work with shelter residents who had been experiencing homelessness prior to the flood. According to the City's EOP, the Red Cross was in charge of providing those services and ensuring support for all residents, including those with access and functional needs, such as older adults, residents who primarily speak Spanish, and residents experiencing homelessness.[12]

- **Did not plan to provide long-term, non-congregate shelter.** During the flood response, City elected officials determined that affected residents needed long-term and non-congregate shelter services. The City's EOP states that the City is responsible for ensuring the necessary and appropriate provision of care and shelter services to residents. The Red Cross primarily provides emergency, congregate shelters, not the long-term, non-congregate shelters City elected officials determined residents needed. City elected officials advocated to ensure City residents' needs were met, and the County expanded beyond Red Cross's services and provided long-term, non-congregate shelter options. However, the City first asked the San Diego Housing Commission to provide these services, despite the fact the commission does not have a formal disaster response role and did not have a plan to do so. Additionally, the County did not have plans to meet long-term, non-congregate shelter needs at this scale.

> *The County did not have plans to meet long-term, non-congregate shelter needs at this scale.*

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12 According to FEMA, people with access and functional needs refers to people who may have additional needs in functional areas, such as communication, transportation, supervision, and medical care. This may include people who have disabilities, live in institutionalized settings, are seniors, are children, are experiencing homelessness, are from diverse cultures, have limited English proficiency or are non-English speaking, or are transportation disadvantaged.

- **Unclear services for affected residents who stay in their homes.** The Mayor's Office, Council Offices, and community groups reported that many residents chose to stay in their homes, despite flood damage, but still needed services. Community groups reported that they worked to provide hot meals and health services to those residents, but expressed frustration that they were on their own to care for their neighbors. The City's EOP states that many San Diegans may choose not to stay in an emergency shelter, but they may still have needs and expectations for disaster. However, the EOP does not expand on that statement to explain what mass care services the City plans to provide to affected residents who choose to not to stay in the emergency shelter.

Because the City's EOP states that the City is responsible for ensuring care and shelter services meet residents' needs, the City should coordinate with the County and Red Cross before the next disaster to ensure City, County, and Red Cross plans will meet residents' needs.

> *The City is responsible for ensuring residents' care and shelter needs are met.*

Although the County and Red Cross were responsible for coordinating and providing care and shelter in response to the flood, the City's EOP states that the City is responsible for ensuring City residents' care and shelter needs are met, including residents with access and functional needs. As such, the City should coordinate with the County and Red Cross prior to the next disaster to ensure the County's and Red Cross' planned services will meet City residents' short- and long-term needs. Additionally, the City should have a plan to monitor during a disaster to ensure the care and shelter services provided meet City residents' needs, and if they do not, to address those needs.

If the City determines that County and Red Cross plans will not meet or are not meeting City residents' needs, City policymakers should decide what actions the City will take to address any gaps. For example, City policymakers should decide if non-congregate shelter services will need to be provided, and if so, under what circumstances. Non-congregate shelter services provide more privacy but are substantially more expensive than Red Cross shelters. Most jurisdictions historically have not provided non-congregate shelter options. Congregate shelters make it easier to provide food, information, and services for affected residents. If policymakers decide non-congregate shelter services will be provided, they should set out specific situations that would necessitate non-congregate shelters, such as disasters during a pandemic, or population characteristics, such as families with newborns.

The City should ensure it has plans to meet its responsibilities in disasters that are not multi-jurisdictional.

Finally, the City should ensure its plan to ensure residents' care and shelter needs are met considers both smaller- and larger-scale disasters. Both the City and Operational Area EOPs state that emergencies will be managed at the lowest possible level of government and that local jurisdictions will exhaust their resources before requesting support from the Operational Area. Therefore, the City should ensure it has an understanding with the Operational Area about the City's responsibilities if a disaster is not multi-jurisdictional and plans to meet them. For larger-scale disasters, the City's plan should account for the fact that it cannot control where the Red Cross prioritizes its resources.

The City should work with the County, Red Cross, and other stakeholders to create a housing plan before the next disaster.

Creating a Pre-Disaster Housing Plan would help ensure the County, the Red Cross, community groups, and other stakeholders are on the same page in terms of the care and shelter services that will be provided after a disaster and which entity is responsible for each element. FEMA recommends pre-disaster housing plans include:

- Having a plan for each of the different stages of housing after a disaster (such as emergency shelters, temporary places to stay, and longer-term housing options);

- Identifying funding sources;

- Considering federal, state, and local recovery programs when planning eligibility; and

- Organizing a local group to lead and coordinate housing efforts after a disaster.

Exhibit 10 shows a timeline of disaster housing activity and some possible funding considerations. Planning for eligibility in advance would also help ensure that programs serve those most in need and that local programs do not inadvertently disqualify residents from FEMA programs.

Exhibit 10

Planning Before a Disaster Can Help Governments Better Transition from Emergency Sheltering to Longer-term Housing
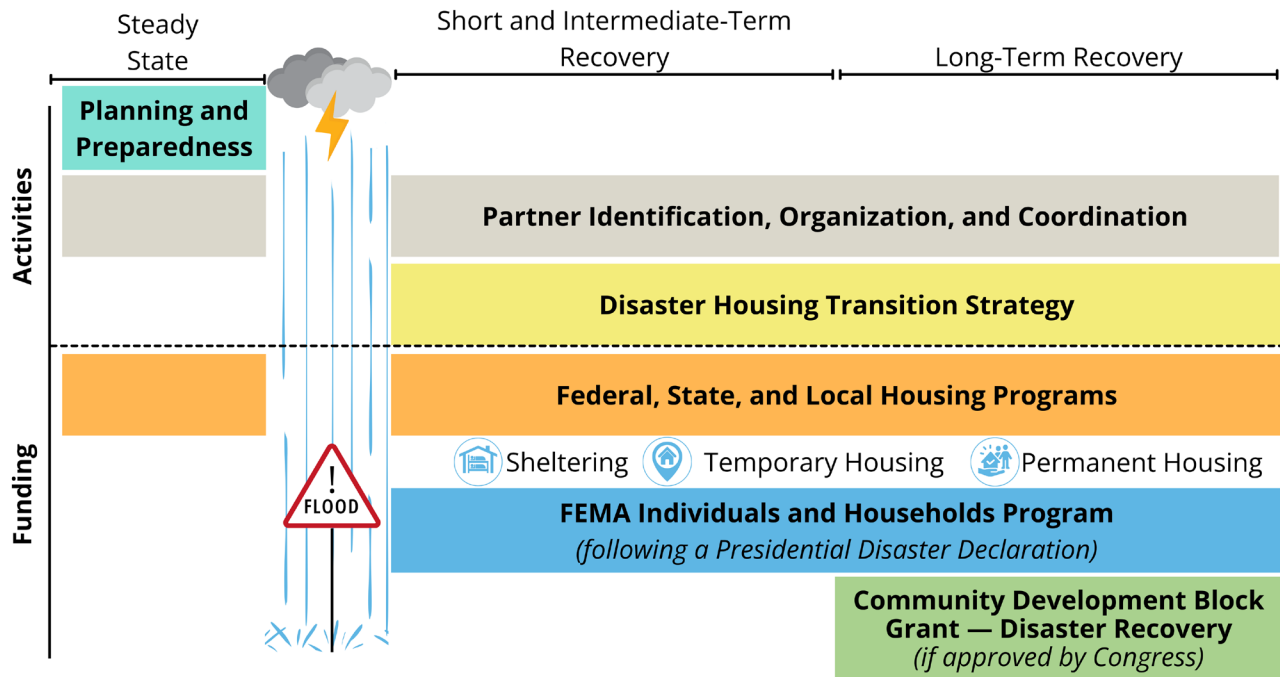
Source: FEMA's Pre-Disaster Housing Planning Guide.

While the distance to the regional Local Assistance Center may have impacted its accessibility, the County and State provide resources needed to make Local Assistance Centers effective.

Local Assistance Centers are set up in the wake of disasters to provide a central location for impacted residents to access services, information, and resource referrals for unmet needs. They have proven to significantly contribute to a streamlined recovery. According to the City's Local Assistance Center Manual, centers should open as soon as possible and should be established close enough for ease of access by the whole community, but safely out of the immediate impact of the disaster. **Exhibit 11** shows the different regional assistance centers that various groups set up during the flood recovery.

Exhibit 11

Hundreds of San Diego Households Visited the Various Regional Assistance Centers

Spring Valley Library Local Assistance Center	Mountain View Community Center Local Assistance Center	Virtual Local Assistance Center	FEMA Disaster Recovery Centers
1/28/2024 - 1/31/2024	2/3/2024 - 2/12/2024	2/12/2024 - Present	3/1/2024 - 4/19/2024
599 City of San Diego Households	**490** City of San Diego Households	**29,925** visits to the web page	**7,134** Regional Households

Source: OCA generated based on data from the City of San Diego, County of San Diego, and FEMA.

On January 28, the County opened a Local Assistance Center at the County's Spring Valley Library. The County said it chose the Spring Valley Library location because Spring Valley was heavily impacted by the storm, and this location had enough space for logistics.

Nearly 600 City of San Diego households used the Spring Valley Local Assistance Center, but community groups and elected officials were frustrated that it was too far away from the neighborhoods hit the hardest. It was 10 miles away, which could be seen as accessible, but impacted residents said that flood damage to their cars made it hard to leave their neighborhood. The Emergency Operations Center staff said public transportation was available, but community organizations and Councilmembers said residents were often reluctant to leave their neighborhoods.

City OES staff asked the Operational Area to open a Local Assistance Center within City limits, but County Office of Emergency Services said it did not have the staff to run a second center. According to County Office of Emergency Services, it offered to give the City technical assistance if the City wanted to open its own. However, according to City OES, the California Office of Emergency Services (CalOES) said it would only provide support to one Local Assistance Center in the region.[13]

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13 We reached out to CalOES to provide additional information, but CalOES staff declined due to ongoing work related to the Santa Ana fires.

> *The City could have opened its own Local Assistance Center, but it would not have been as effective.*

CalOES guidance states that it is up to local governments to decide if a Local Assistance Center is needed and to set one up. However, CalOES guidance also states that an effective Local Assistance Center requires the participation of local, state, and federal agencies and is normally staffed by those agencies. Therefore, although the City could have established its own Local Assistance Center within City limits, it would not have had state or federal resources and would therefore not have been as effective, according to CalOES guidance and City OES staff.
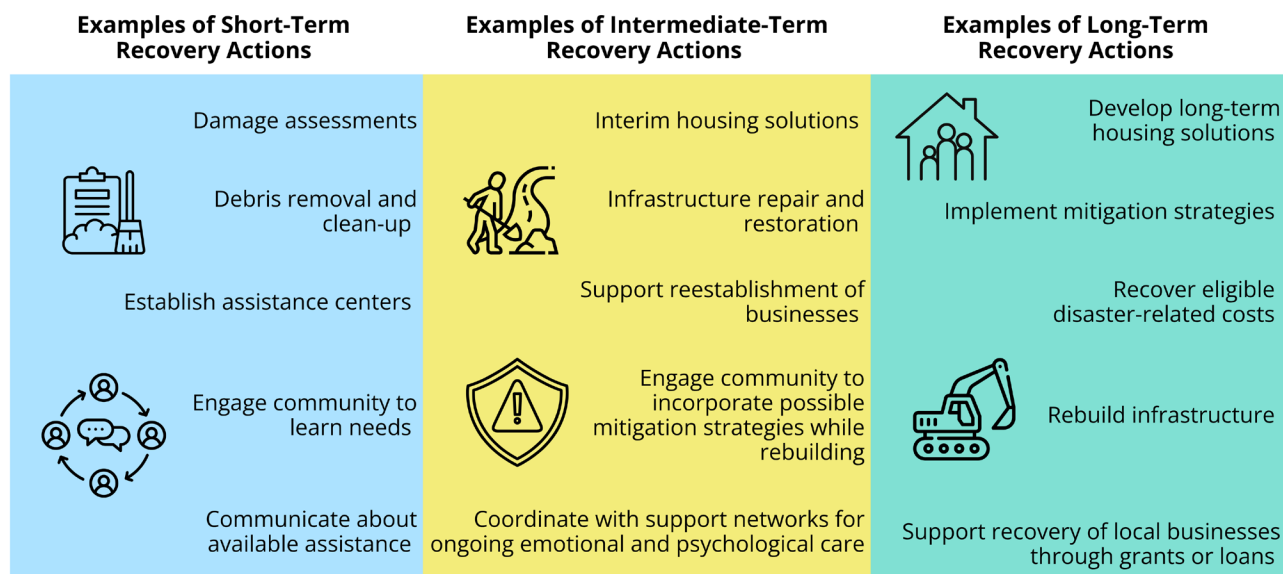
In the meantime, the City had opened four donation centers that served as community resource hubs in the most affected communities. The City used the sites to collect and disseminate donated goods, provide information via flyers, and provide workable showers and bathroom facilities. When the County closed the Spring Valley location, the City opened and operated a Local Assistance Center at the Mountain View Community Center, with the County coordinating County, State, and non-governmental resources.

Creating a recovery plan would help align the City's planned response with elected officials' expectations.

As mentioned, FEMA states that recovery efforts after a disaster include short-, medium-, and long-term efforts to restore infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a disaster, outlined in **Exhibit 12**. Although the City cannot restore a community by itself, it can have a plan to identify the affected community's needs and invite the key players to the table to meet those needs.

Exhibit 12

The City Should Have a Plan for All Three Phases of Post-Disaster Recovery

Examples of Short-Term Recovery Actions	Examples of Intermediate-Term Recovery Actions	Examples of Long-Term Recovery Actions
Damage assessments	Interim housing solutions	Develop long-term housing solutions
Debris removal and clean-up	Infrastructure repair and restoration	Implement mitigation strategies
Establish assistance centers	Support reestablishment of businesses	Recover eligible disaster-related costs
Engage community to learn needs	Engage community to incorporate possible mitigation strategies while rebuilding	Rebuild infrastructure
Communicate about available assistance	Coordinate with support networks for ongoing emotional and psychological care	Support recovery of local businesses through grants or loans

Source: OCA generated based on FEMA guidance.

> *There was no one central entity at the City overseeing recovery functions.*

During the January flood recovery, the Emergency Operations Center managed many parts of the recovery, such as fixing infrastructure, tracking costs, and assessing damage. However, the Mayor's Office said other elements were missing from the City's response and took them on itself, such as engaging with the community to learn their needs, providing direct messaging about available assistance, and creating donation centers. Other aspects of recovery, such as providing grants to local businesses and waiving permitting fees, were led by other City departments. Without a recovery plan, there was no one central entity at the City overseeing the recovery functions. As a result, the affected community and some City Councilmembers felt confused and frustrated, saying it was unclear who oversaw recovery after the initial emergency response was over.

Creating a pre-disaster recovery plan would establish clear leadership, smooth communication, and smart use of resources. This reduces confusion after a disaster. It also builds stronger community partnerships, improves access to funding, and integrates resilience into rebuilding, which supports a faster, more effective recovery. OES staff said that recovery is incorporated throughout the City's EOP and that they use the Operational Area's recovery plan. However, the Operational Area's recovery plan mainly covers unincorporated areas and outlines the County's coordination role. Additionally, the plan states that local jurisdictions are responsible for developing individual

recovery plans and leading their individual recovery operations. Effective recovery, as outlined in FEMA's National Disaster Recovery Framework, requires proactive planning before a disaster strikes, coordinated response efforts during the event, and sustained long-term actions to rebuild and enhance community resilience, as shown in **Exhibit 13.**

Exhibit 13

Governments Should Integrate Recovery into Continuous Preparedness Efforts, Extending through Immediate Response and Long-term Rebuilding over Months and Years
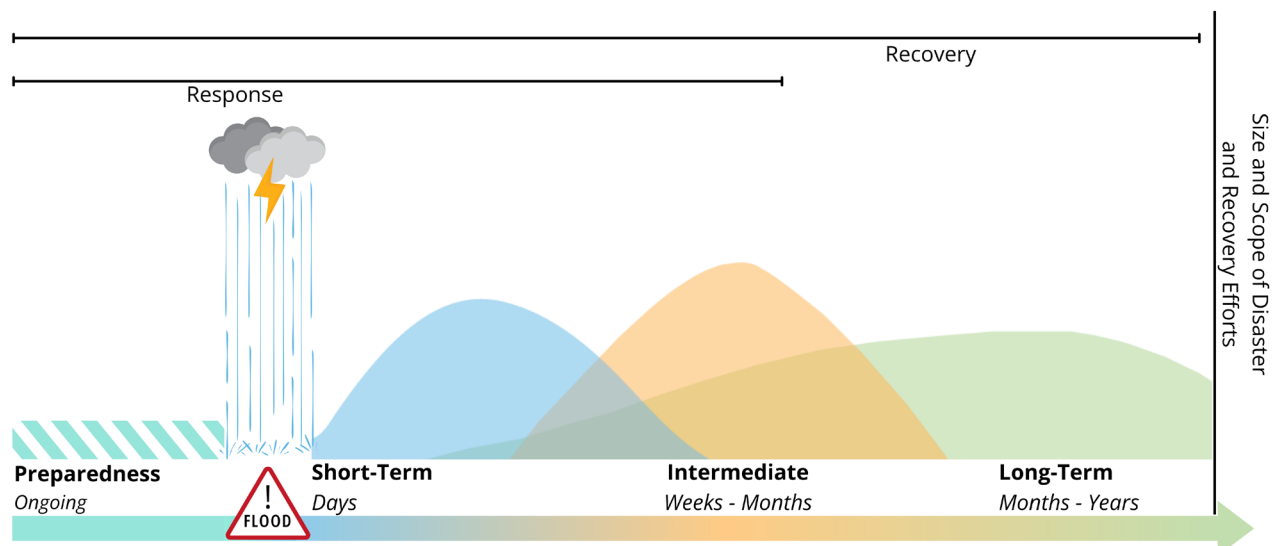
Source: FEMA's National Disaster Recovery Framework.

Other cities in California, including Los Angeles, Oakland, Sacramento, and San Jose, have developed recovery plans as annexes to their EOP. These annexes discuss each of the recovery functions and establish the roles and responsibilities of different city departments relating to the recovery functions. Additionally, the recovery plans state when the annex will be activated, and they establish the city's recovery structure, including which agency is responsible for leading city recovery efforts. Development of a similar plan or annex for San Diego could help establish clear roles and responsibilities for departments in recovery.

Educating City policymakers and the public on emergency response roles and responsibilities before the next emergency would help reduce confusion.

The confusion experienced during recovery highlights the need for clearer communication about the roles and limitations of the City and its partners before a disaster occurs. Community groups said they felt the City, County, FEMA, and non-governmental organizations kept saying the other group was responsible for different parts of the recovery process. According to operations staff, elected officials and community members would often request support for operations the City does not undertake, like cleaning out flood-damaged homes. Although people may always expect the City to take actions beyond the role of a local government, communicating roles and responsibilities prior to an emergency would help reduce that confusion.

The City provides some education materials, but the materials are not clear and centralized. For example:

- The City's EOP is available to policymakers and the public upon request, but it is a highly technical document that is not designed to clearly and succinctly lay out what the public can expect from the City during a disaster.

- The City provides some information for the public on individual disaster preparation activities, such as planning evacuations or creating emergency kits. However, its available materials do not set out the City's role in an emergency, include hazard-specific information, or identify available recovery assistance programs.

- Since the flood, the City's Stormwater Department has sent pamphlets to residents in floodplains informing them they live in a floodplain and that they can purchase flood insurance, but the City has not determined how it plans to conduct regular public outreach on this moving forward.[14]

After establishing the roles and responsibilities framework discussed earlier in this finding, developing, publishing, and training policymakers and the public on a succinct guide to these roles during an emergency could help ensure policymakers and the public are better prepared for the next emergency. Other cities have more expansive public

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14 The Stormwater Department stated to OCA that it will continue distributing floodplain pamphlets or similar information, either by mail or digitally, to residents in high-risk flood areas on an annual basis. San Diegans can receive a discount on flood insurance through FEMA's National Flood Insurance Program due to the City's work to meet floodplain management standards.

preparedness documents, including information on financial assistance resources and what to do in specific hazards, such as floods or fires. For example, the City of Houston provides detailed guidance on preparing for and responding to flooding and tools for recovery, like how to clean out your home and dispose of waste.[15] Similarly, the City of Los Angeles has a public emergency preparedness guide that describes what the levels of evacuation mean, states how to respond during an earthquake, and shares a variety of communication tools that agencies will use to keep the public informed.[16] **Exhibit 14** is an example of specific information Houston provides in its public guide.

Exhibit 14

Houston's Emergency Preparedness Guide Includes Information on What Residents Should Do After a Storm

MANAGING DEBRIS

Debris Collection
Following a large-scale emergency, the City may implement a program to collect debris in neighborhoods.

Documenting Damage
Before putting debris out for collection, you should do the following:
- Contact your insurance company to file a claim.
- Document your property damage(s) by taking photographs.
- Contact 3-1-1 (713.837.0311) to notify the City of your damage(s). This will help the City identify areas that will need debris collection.
- If a federal disaster declaration has been issued, call FEMA (800.621.3362), or apply online at **disasterassistance.gov** to file a Disaster Assistance Claim.

Safely Handling Debris
Remember that debris, especially after flooding incidents, can be hazardous to your health or safety. You should always:
- Wear gloves and eye protection when removing construction materials such as drywall, wood siding, large furniture.
- Wear long-pants and sturdy shoes in debris-riddled areas to prevent injury.
- For specific instructions on how to safely remove drywall and debris, go to **houstonrecovers.org.**

AFTER THE STORM

Source: City of Houston's Disaster Preparedness Guide.

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15 The City of Houston's Disaster Preparedness Guide can be found here: https://s3-us-west-2.amazonaws.com/uasi-jtti/wp-content/uploads/sites/29/2020/04/07215940/COH-DPG2020.pdf

16 The The City of Los Angeles' Emergency Preparedness Guide can be found here: https://emergency.lacity.gov/sites/g/files/wph1791/files/2023-11/LACity_Emergency%20Preparedness%20Guide_sm.pdf

Working with local organizations before emergencies happen can help the City build trust and establish clear expectations.

Community is the primary force behind recovery and the return to normalcy.

Governments play a significant role in disaster response and recovery, but the community is the primary force behind recovery and the return to normalcy.[17] This became evident in San Diego during the January 2024 floods, as community members responded swiftly and effectively, distributing food and clothing, establishing donation centers, and mobilizing volunteers to help clean out homes. However, community organizations that responded said they did not know what to expect from the City and had to learn about flood response and recovery themselves. Community groups in impacted areas said trust in the City was low prior to the flooding and diminished due to their perception of the City's response to the floods. Even more established non-governmental organizations like the San Diego Voluntary Organizations Active in Disaster (VOAD) said they initially did not know who to contact or coordinate with at the City.[18]

Community groups said trust in the City was low prior to the flooding and diminished after.

Community resources already exist that the City could better coordinate with. In previous disasters, the San Diego Foundation coordinated much of the philanthropic community through its Regional Disaster Fund and Board. VOAD's goal is to coordinate nonprofit and volunteer resources through disaster response and recovery. The San Diego Salvation Army reported it is building an Emergency Operations Center of its own. State of California (State) guidelines recommend that Operational Areas (i.e., the County of San Diego) take the lead on coordinating with non-governmental organizations that operate throughout the county such as the Red Cross or VOAD. However, the Red Cross and VOAD also indicated that having direct connections to City operations helps improve coordination.

Furthermore, the State guidelines do not explain how local governments should work with smaller, community-level organizations. Many residents impacted by the January storm relied on community organizations that had no previous disaster response experience. Residents may prefer to work with these community organizations over larger, disaster-specific organizations, as community groups said that disaster monopolies are harmful to communities that may not fit

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17 For more details, FEMA's document on the Whole Community approach to emergency management can be found here: https://www.fema.gov/sites/default/files/2020-07/whole_community_dec2011__2.pdf

18 Many key OES staff members were relatively new to City employment and had not had time to build community connections. Since the January 2024 floods, both OES and key disaster response non-governmental organizations have said connections have become stronger.

into the typical disaster response framework.[19] Additionally, there are risks that the typical emergency response and recovery framework does not help all people impacted by disasters equally. Analyses done by news agencies have indicated that FEMA assistance is often less accessible to the poorest renters and homeowners, and even when received, does not make a survivor whole.

FEMA encourages government agencies to form partnerships with community leaders to clarify roles and ensure clear communication.

FEMA encourages government agencies to form partnerships with community leaders to clarify roles and responsibilities and ensure clear communication. FEMA also recommends emergency response organizations empower local action by promoting and coordinating, but not directing, conversations and efforts of members of the community in recovery actions. These partnerships build trust with the community, identify local resources, understand community needs, and increase resiliency. The City's previous Chief Operating Officer used the analogy of the City hosting the table at which government organizations, community groups, and other organizers gather to collaborate. **Exhibit 15** illustrates the groups that could be around the table to support a community-driven recovery.

19 The term disaster monopolies refers to singular agencies that are solely responsible for an aspect of disaster response or recovery.

Exhibit 15

Community-Driven Recovery Organizes Support from Governments, Businesses, and Non-Profit Partners Around Community Needs
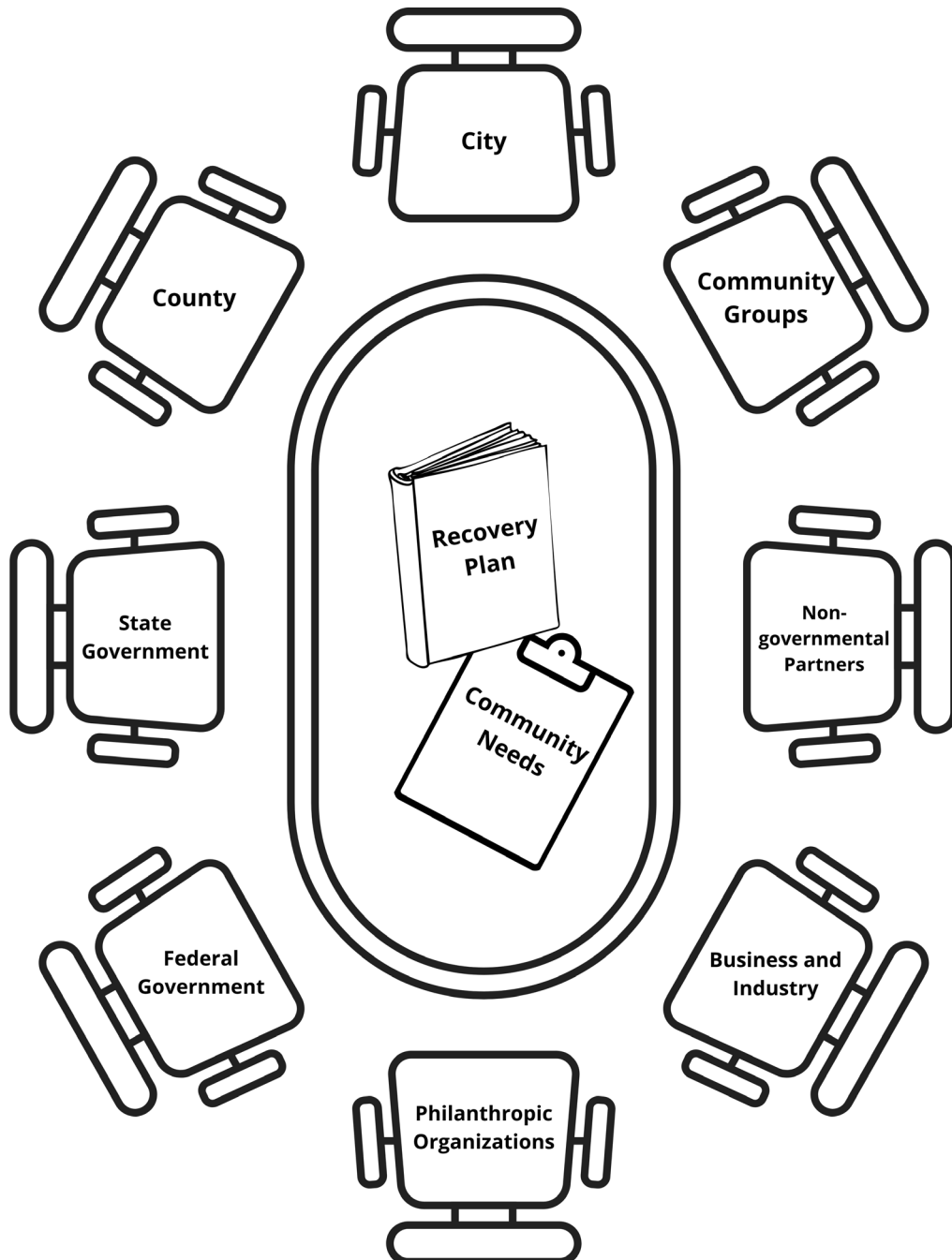
Source: OCA generated based on FEMA's National Disaster Recovery Framework.

To help rebuild trust and improve the City's response to community needs in future disasters, the City should create a plan to build and maintain relationships with non-governmental and community organizations working in disaster response, including those who are working in active disasters. FEMA warns that government alone cannot handle disaster response. While an increase in community engagement could have increased costs for the City in planning and response, the City could take advantage of the existing relationships that elected officials have with community organizations to improve coordination and communication with these groups in future disasters.

Recommendations

To ensure the City identifies and plans for responsibilities in disaster response and recovery, we make the following recommendations:

Recommendation 1.1 (Priority 1)

The Mayor's Office should work with the City Council, Office of Emergency Services, other relevant departments, and other stakeholders to develop a framework that clearly sets out the City's overall planned role in disaster response and recovery. The framework should address key questions raised during the January 2024 flood response, including:

a. What types of short-, intermediate-, and long-term recovery needs will the City plan to meet, and in what instances?

b. Does the City expect short-, transitional-, and/or long-term shelter services for its residents?

c. Does the City expect non-congregate shelter options for its residents, and if so, in what instances?

d. Does the City expect mass care services for affected residents who choose to stay in their homes?

e. If the relevant stakeholders do not plan to meet the expected needs, does the City plan to provide those care and shelter services itself?

f. What information does the City expect to have about residents' needs, and what method or methods would the City use to collect that information?

The framework should also outline, at a high-level, the roles expected of external entities like the County of San Diego, the Operational Area, the State, FEMA, and individuals, businesses, and non-governmental organizations. While it will not direct these entities, the framework will clarify where the City expects certain needs to be met based on laws, agreements, and coordination.

The goal of the framework is to establish internal consensus on the City's overall response and recovery roles and communicate this to City Council, non-governmental organizations, and the public before emergencies arise, ensuring clear expectations. Management should present the framework to City Council, including potential costs of any additional roles the City plans to take on in future emergencies.

Once the City establishes the framework, the City should develop and publish a clear, easy-to-understand document that communicates the framework and outlines the City's overall planned role, as well as the expected roles of other stakeholders, for use by City leadership and the public.

Management Response: Agree [See full response beginning on page 80.]

Target Implementation Date: As determined by the Mayor's Office

Recommendation 1.2 (Priority 1)

After the implementation of Recommendation 1.1, the Office of Emergency Services should create a City-specific recovery plan that establishes:

a. When the plan will be activated;

b. The short-, intermediate-, and long-term recovery activities the City plans to undertake, including those identified through Recommendation 1.1

c. The department or position responsible for overall oversight of the City's recovery activities

d. Recovery roles and responsibilities of different City departments

e. Expected roles and responsibilities of external agencies like the County of San Diego, the American Red Cross, and other non-governmental organizations; and

f. How the City engaged with the community to develop the plan.

The Office of Emergency Services should update and present the plan to City Council at least every five years, in line with updates to the City's Emergency Operations Plan, and should also update it on an ongoing basis to incorporate best practices and lessons learned from exercises and activations. The plan should be posted publicly with other public City resources on disaster planning and preparedness and could be included in the City's Emergency Operations Plan as an annex.

Management Response: Agree [See full response beginning on page 82.]

Target Implementation Date: Contingent on guidance provided by Recommendation 1.1

Recommendation 1.3 (Priority 1)

The Office of Emergency Services should work with the Mayor's Office to clarify how policy direction will be provided to the Emergency Operations Center, and clarify the Mayor's Office's responsibilities in emergency planning, response, and recovery. The clarified method and responsibilities should be documented in relevant policy or procedure, such as the Emergency Operations Plan or Manual. The identified necessary trainings to ensure the Mayor's Office is knowledgeable of its responsibilities should be documented and tracked as part of the broader training program in Recommendation 4.6.

Management Response: Agree [See full response beginning on page 82.]

Target Implementation Date: July 2026

Recommendation 1.4 (Priority 2)

The Office of Emergency Services, in consultation with the Mayor's Office and City Council, should propose to City Council a Council Policy, or other mechanism that requires City Council approval, that clarifies Council Offices' responsibilities in emergency planning, response, and recovery. The policy or mechanism should include, at minimum:

a. The formal roles and responsibilities of City Councilmembers and their staff. This could include activities in addition to their current roles, such as:

   i.   Communicating public information provided by City operations to residents;

   ii. Working with impacted communities and community organizations to assess and communicate community needs; and

    iii. Encouraging community philanthropic activity.

b. The topics covered by training provided to City Councilmembers and Council Office staff. We recommend topics include:

    i. City Council Office roles and responsibilities in disaster planning, response, and recovery;

    ii. The City's and other organizations' roles and responsibilities in disaster planning, response, and recovery, including the framework established in Recommendation 1.1;

    iii. The overall emergency management structure under the Standardized Emergency Management System;

    iv. The internal disaster-communications plan for City Councilmembers established in Recommendation 1.5.

c. When the City will provide training to City Councilmembers. We recommend the City provide training to City Councilmembers and their staff at least when Councilmembers are newly elected to City Council and upon request thereafter.

d. If and how often Councilmembers and/or their staff will plan to attend City emergency response tabletop exercises and other emergency response trainings or exercises.

Management Response: Agree [See full response beginning on page 83.]

Target Implementation Date: July 2026

Recommendation 1.5   (Priority 3)

The Mayor's Office should work with the City Council to establish an internal disaster-communications procedure that details how and when City Council Offices can expect to be informed of emergencies and disaster response activities in and near their districts, and how City Council Offices can best communicate community needs to the City's emergency response structure.

Management Response: Agree [See full response beginning on page 83.]

Target Implementation Date: July 2026

Recommendation 1.6 (Priority 2)

After the implementation of Recommendation 1.1, the Office of Emergency Services, in consultation with the Mayor's Office, the County of San Diego, the American Red Cross, and other stakeholders, should develop a Pre-Disaster Housing Plan. The plan could be an annex to the existing Emergency Operations Plan. The plan should include elements determined in Recommendation 1.1, as well as other elements, including but not limited to:

1. The City's role in providing short- and long-term shelter to disaster survivors, including in small- and large-scale disasters;

2. Circumstances when non-congregate shelter options may be sought and a plan for their provision;

3. Identified funding sources, including general cost estimates for City-provided shelter options;

4. How the City will ensure individuals with access and functional needs will be appropriately accommodated;

5. Consideration of federal, state, and local recovery programs when planning eligibility; and

6. How non-governmental organizations were involved in creating the plan and how they will be involved in its implementation.

Management Response: Agree [See full response beginning on page 84.]

Target Implementation Date: July 2026

Recommendation 1.7 (Priority 3)

The Office of Emergency Services should centralize on the City's public website City information related to disaster preparedness, response, and recovery. The site should include a public version of the framework developed in Recommendation 1.1 and additional disaster preparedness information, such as disaster-specific information on risk area, preparation, and response, similar to the examples provided from Houston and Los Angeles.

Management Response: Agree [See full response beginning on page 84.]

Target Implementation Date: October 2025

Recommendation 1.8 (Priority 3)

The Stormwater Department should develop a policy detailing ongoing outreach to residents, property owners, and businesses within the floodplain.

a. The outreach should, at minimum, inform the residents that they are in a floodplain, that normal insurance does not typically cover flood damage, and that flood insurance is available for both owners and renters.

b. The outreach should include the public framework document created in Recommendation 1.7, or a similar document with the information clearly presented.

c. The policy should detail how the Stormwater Department plans to conduct outreach and how often.

Management Response: Agree [See full response beginning on page 85.]

Target Implementation Date: October 2025

Recommendation 1.9 (Priority 2)

The Office of Emergency Services should work with the Mayor's Office to develop a plan for building and maintaining relationships with non-governmental and community organizations involved in disaster response. This plan should identify points of contact, establish communication channels, identify relevant groups for participation in trainings, and include strategies for identifying and communicating with impacted community organizations working in active disasters.

Management Response: Agree [See full response beginning on page 85.]

Target Implementation Date: July 2026

Finding 2

The City does not have a plan to ensure it quickly and effectively communicates response and recovery information with all members of the public after a disaster.

Finding Summary

Although the City of San Diego (City) followed its Emergency Operations Plan (EOP) for public communications, the plan did not account for the communication needs unique to floods and the communities affected. Residents need accurate and timely information during and after a disaster, and the City must meet those needs by providing accurate information quickly and in a method that reaches all residents.

We found that the City did not have a comprehensive plan for communicating with affected residents whose televisions and cell phones may not work due to flood damage or with residents who speak languages other than English. We also found that although the Mayor's Office wanted to approve public communications because of the importance and sensitivity of the communications, this process deviated from best practices and caused some delays, confusion, and duplication of efforts among staff.

We recommend the City expand its emergency communications plans to ensure it accounts for residents' needs. Additionally, we recommend the City revise its policies to ensure it quickly approves and disseminates public information, including translated documents, during and after an emergency.

The City followed its Emergency Operations Plan for public communications.

As shown in **Exhibit 16**, the City followed its EOP for public communications. In line with the EOP, in the early days of the flood response, the City used traditional and digital media to communicate information about the storm.[20] This included media releases to news services, communications through Alert San Diego, and postings on the City's website and social media accounts.

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20 Traditional media includes television, newspapers, and radio. Digital media includes websites and social media posts, generally accessed through phones or computers.

Exhibit 16

The City Followed the Communication Guidelines for Public Communication During the January Storm

Participated in the Operational Area Joint Information Center

Coordinated with Department Operating Centers to distribute consistent information

Wrote and distributed information to the media

Scheduled news conferences

Posted information on the City's social media channels

Updated the City's Website

Source: OCA generated based on review of the City's Emergency Operations Plan, the City's January 2024 After-Action Report, City departments' feedback for the After-Action Report, the City's social media account postings, and interviews with City departments.

However, the Emergency Operations Plan did not account for the communication challenges unique to floods and the needs of the community affected, creating concerns that some residents were not getting needed information.

City Council Offices, the Mayor's Office, and a community group said in interviews that many residents in the most impacted communities could not access traditional and digital forms of communication after the floods. They said this was in part because phones and chargers, televisions, and electrical outlets had been damaged by the water

from the floods. Additionally, data from the City's Climate Equity Index states that communities in the heavily flooded areas have a higher percentage of households without internet access and a higher percentage of household with limited English proficiency than average in San Diego. According to the Federal Emergency Management Agency (FEMA), timely and accurate communication during and after an emergency is essential and can help ensure public safety, facilitate response efforts, and instill public confidence. FEMA reports that effective communication entails developing a strategy to ensure that emergency communications meet the needs of the whole community, including those with access and functional needs.[21]

> *Emergency communications should meet the needs of the whole community.*

The EOP and the Emergency Operations Center Manual do not include plans for alternative methods of communication that may be necessary to meet residents' needs. The Communications Department has a list of responsibilities for public information officers who report to the Emergency Operations Center for disasters, and the list discusses the use of flyers and acknowledges the potential need for translating communications. However, the list does not discuss canvassing, does not discuss how the translation process may be expedited in an emergency, and is not included with the other Emergency Operations Center plans and guidance.

Because the City initially relied on traditional and digital media to communicate with affected residents, Mayor's Office staff directed the Emergency Operations Center to disseminate flyers, which caused issues with communication timeliness and accuracy.

To ensure affected residents without access to traditional and digital media received the City's communications, Mayor's Office staff requested the Emergency Operations Center use flyers. However, the use of flyers was not a normal practice for the Emergency Operations Center, so it did not have a plan or templates to readily deploy flyers. Without a plan, there were some issues with the use of flyers:

> *Mayor's Office and Communications Department staff disagreed on the content of flyers, leading to delays.*

- According to staff from both groups, the Mayor's Office and Communications Department staff disagreed on the types of information that should be included in the flyers, which led to delays creating the flyers. For example, the Mayor's Office believed the City should provide more information to affected residents about remediation after flooding, such as the risk of mold.

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21 According to FEMA, people with access and functional needs refers to people who may have additional needs in functional areas, such as communication, transportation, supervision, and medical care. This may include people who have disabilities, live in institutionalized settings, are seniors, are children, are experiencing homelessness, are from diverse cultures, have limited English proficiency or are non-English speaking, or are transportation disadvantaged.

- Staff said the Mayor's Office and the Communications Department both created templates for flyers, which caused confusion and duplication of efforts.

- Mayor's Office staff said the language the Emergency Operations Center used was not always sensitive to the community, so it required Mayor's Office staff approve the flyers before their release, contributing to delays releasing flyers, according to operations staff.

- Emergency response staff said using flyers created confusion for affected residents, as flyers are static and therefore may become outdated quickly. For example, a resident could see a flyer that says shelter is available at a specific location, but not know that the flyer was posted a week ago and that shelter location has now changed.

> *Emergency response staff said using flyers created confusion for affected residents.*

To mitigate these issues in the future, the City should create templates for flyers and agree on the types of information to be provided in flyers before the next disaster.

To ensure residents without access to digital and traditional media received City communications, Mayor's Office staff also directed the Emergency Operations Center to conduct door-to-door canvassing.

Mayor's Office and Council Office staff said they were canvassing the most impacted neighborhoods and talking to residents door-to-door in the days immediately after the storm because they were concerned that residents were not getting City communications and that the City was not collecting information to know what residents needed. Mayor's Office staff said the Emergency Operations Center did not seem prepared to do door-to-door canvassing and did not have a plan for it. Emergency Operations Center staff agreed, they do not normally canvass, and said canvassing requires a lot of staff time and resources. Voluntary Organizations Active in Disaster (VOAD), which includes the American Red Cross (Red Cross), said that VOAD normally canvasses.

> *Canvassing requires a lot of time and resources.*

To ensure residents were receiving City communications and to ensure the City was aware of residents' needs, the Mayor's Office directed the Emergency Operations Center to canvass the most heavily impacted areas. The Mayor's Office worked with staff from the Performance and Analytics Department to develop the survey questions City staff would ask residents when they canvassed. However, because the City did not have a plan prior to the disaster response to canvass, the effort ran into some issues:

- Staff said the City, Red Cross, and other organizations were canvassing the same area without coordinating with each other. Staff said groups were going to the same homes that had already been canvassed and some residents complained of the repeated canvassing efforts. Non-governmental organizations said residents were frustrated or confused because residents were asked to answer similar questions repeatedly by different groups.

- Community groups said the City's canvassing effort was too late—the City canvassed formally more than a week after the storm, after many residents had left their homes.

- Operations staff said some of the questions included in the survey may have led residents to believe that the City would provide resources it did not plan to provide, creating frustrations for residents.

> *Non-governmental organizations said residents were frustrated or confused with the canvassing efforts.*

Given the resource needs of canvassing and its potential drawbacks, City policymakers should decide if canvassing is a method the City will use in the future to disseminate and/or collect information from impacted residents during a disaster. If policymakers decide that canvassing should be a tool the City uses, the City's Office of Emergency Services (OES) should determine the situations that canvassing would likely be appropriate for, with input from policymakers. If canvassing is a tool the City plans to use, OES should also make a plan for canvassing in the future that includes a timeline for canvassing effort, translation services, and a template of questions to ask impacted residents, including whether the City can share the data with other agencies, so the City can quickly activate canvassing efforts.

The Emergency Operations Plan also did not account for communicating to residents who speak languages other than English, leading to rushed efforts that resulted in errors and risked unsuccessful canvassing efforts.

The City's EOP and Emergency Operations Center Manual do not include plans for communicating with residents in languages other than English during an emergency. OES stated that it relies on the Communications Department to ensure emergency communications are translated into residents' preferred languages. The Communications Department stated that the public information officers who report to the Emergency Operations Center know the Communications Department procedures for translations. However, the procedures are not included in Emergency Operations Center plans. Additionally, communication extends beyond written material.

For example, operations staff said the canvassing efforts did not include translators, risking excluding the many affected residents that had limited English proficiency.

Additionally, for written material like the flyers, neither the Emergency Operations Center materials nor the Communications Department list of responsibilities discuss how the translation process may be expedited in an emergency. The Mayor's Office staff said that public information officers took too long to create flyers, so they created and translated many of the flyers themselves. We found that several of the flyers that the Mayor's Office staff translated contained minor spelling or translation errors. We also found that one of the flyers contained errors that resulted in the community receiving inaccurate information. As shown in **Exhibit 17**, a flyer in English directing residents to prepare for the next storm dated February 3, 2024, informed residents that the rain was forecasted to possibly start on February 5 and that sandbags would be available at 13 recreation centers. However, the same flyer in Spanish informed residents that rain was forecasted to start on January 31 (three days prior to the flyer's publication) and that sandbags would be available at just 10 recreation centers.

Exhibit 17

The Spanish Version of a Flyer about Storm Recovery and Preparedness Contained Errors, Such as the Date of the Upcoming Storm

Source: Flyers provided by the Mayor's Office, with emphasis added by OCA.

Although these were relatively minor issues, given the importance of accurate and timely communication in a disaster, the City should have a plan to communicate during and after an emergency with the many residents in San Diego that have limited English proficiency and instead speak Spanish, Vietnamese, Tagalog, and other languages. The City should ensure each of its communication strategies, such as flyers and canvassing, account for access and functional needs like limited English proficiency.

Although the Mayor's Office wanted to approve public communications because of the importance and sensitivity of the communications, this process deviated from best practices and caused some delays, confusion, and duplication of efforts among staff.

In a typical emergency, public information officers who are trained in crisis communication report to the Emergency Operations Center and disseminate accurate and timely information to the public. However, during the flood response, the Mayor's Office required that it review and approve information before it was released to the public. Multiple staff interviewed said that the review and approval requirement led to delays in the release of public information and that this approach did not follow crisis communication best practices.

Incident Management Team staff said not hosting a town hall left impacted residents feeling frustrated, lacking information.

For example, hosting or attending a town hall for affected residents after a disaster is a best practice because it can allow affected residents to voice their questions and concerns and give governments the opportunity to directly respond. However, Mayor's Office staff denied the Incident Management Team's request for a town hall. The Incident Management Team said that this left impacted residents feeling frustrated because they were not getting information they needed to know about response and recovery efforts. In contrast, the local YMCA acted as a resource hub and resembled a town hall for community organizations; it was seen as a success. The Mayor's Office staff said it denied the town hall request because it was concerned the travel and mobility issues impacting residents would have made it difficult for residents to get to a town hall meeting. Instead, Mayor's Office staff said they wanted City staff to communicate directly to residents where the residents were, such as talking to residents at home through door-to-door canvassing. The absence of a town hall meeting did not cause a significant negative impact, as the City found other ways of communicating with affected residents, but community organizations said affected residents felt like the City was not around

and residents were on their own. Hosting a town hall in affected communities early in the response, in line with best practices, could have helped the City speak directly to affected communities, answer questions, and explain City response efforts.

In another example, the Mayor's Office became involved in reviewing and editing the language for Wireless Emergency Alerts.[22] Wireless Emergency Alerts must follow specific regulations and are usually sent out directly by the San Diego Fire-Rescue Department (Fire-Rescue) or San Diego Police Department (Police). Mayor's Office staff said that they were involved because of the sensitivity of the messages. Mayor's Office staff, Fire-Rescue staff, and Police staff agreed that the Mayor's Office's review did not cause significant delays that impacted the timeliness or effectiveness of the alert. However, Fire-Rescue and Police staff said the review did delay the message, and they raised concerns that in future emergencies, even a minor delay could impact the timeliness and effectiveness of the alert.

> *Fire–Rescue and Police staff raised concerns that, in future emergencies, even a minor delay could impact the alert's effectiveness.*

Ultimately, the City's EOP states that the Mayor's Office has communications approval authority, so the Mayor's Office acted within its purview. However, given the extensive training public information officers have in crisis communication and the many communication needs in emergencies, the Mayor's Office should create a plan to expeditiously approve public information for release, if it chooses not to delegate the authority to the Emergency Operations Center. For example, the City could plan to establish a joint information center, which houses all participating public information officers to coordinate all incident-related public information activities. Additionally, if the Mayor's Office approved flyers and canvassing templates that the Emergency Operations Center plans to use prior to a disaster, those materials could be communicated quicker.

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22 A Wireless Emergency Alert is a public safety system that allows national, state, or local governments to send alerts regarding public safety emergencies (such as severe weather or missing children) to cell phones in the geographic area affected by the emergency.

Recommendations

To ensure the City can quickly and effectively communicate response and recovery information with all members of the public after a disaster, we recommend:

Recommendation 2.1 (Priority 2)

The Mayor's Office, in consultation with City Council and relevant departments, should determine if the City will use canvassing in future disaster responses.

If the Mayor's Office decides the City will use canvassing in future disaster responses, the Office of Emergency Services (OES) should outline in policy or procedure the general situations in which canvassing would be used.

Additionally, OES should create a canvassing plan and the plan should include, at minimum:

a. A timeline for effective canvassing;

b. Considerations to mitigate repeat canvassing, including overlap with other canvassing efforts from other governmental or nongovernmental organizations;

c. A plan to identify and address potential language and interpretation needs;

d. A template of questions for collecting information that has been pre-approved by the relevant departments and includes a question about data sharing; and

e. Guidelines and scripts for just-in-time training for canvassers.

Management Response: Agree [See full response beginning on page 85.]

Target Implementation Date: July 2026

Recommendation 2.2 (Priority 2)

The Office of Emergency Services, in consultation with the Mayor's Office and Communications Department, should create disaster messaging templates, including pre-translated messages, for flyers and social media posts that may be necessary during and after different types of disasters that the City can use to provide necessary and timely information to the public. The templates should be pre-approved by relevant departments when possible.

Management Response: Agree [See full response beginning on page 86.]

Target Implementation Date: July 2026

Recommendation 2.3   (Priority 2)

The Office of Emergency Services, in consultation with the Communications Department, should update the Emergency Operations Plan and Emergency Operations Center Manual to include plans and procedures that ensure all of its public communications methods will meet residents' access and functional needs, including the expeditious translation of written materials.

Management Response: Agree [See full response beginning on page 86.]

Target Implementation Date: July 2026

Recommendation 2.4   (Priority 2)

The The Mayor's Office, in consultation with the Office of Emergency Services and Communications Department, should create or update policies and procedures to ensure the expeditious approval and dissemination of public information during and after an emergency. The policies could include creating procedures for establishing a City-specific joint information center.

Management Response: Agree [See full response beginning on page 86.]

Target Implementation Date: July 2026

Finding 3

The City's use of an incident management team worked well to respond to infrastructure damaged by the storm, but a lack of documented policies and staff training led to delays getting its response started.

Finding Summary

An incident management team (IMT) is a specialized group of trained people that manage emergencies. According to the Federal Emergency Management Agency (FEMA), IMTs can be local, regional, or national and can manage incidents such as:

- Natural disasters like hurricanes and floods;

- Public health emergencies;

- Terrorist incidents;

- Planned training exercises or public events requiring the cooperation and joint participation of two or more agencies or jurisdictions; and

- Other complex incidents like train derailments, aircraft incidents, and natural gas leaks.

According to City of San Diego (City) staff, the Fire-Rescue Department (Fire-Rescue) uses IMTs frequently, but the City has not used many IMTs to respond to emergencies other than fires. The City used an IMT to respond to the January storm because the City needed dedicated oversight and coordination to ensure effective cleanup and preparation in the areas of the City most affected by the floods. Overall, City staff reported that using the IMT was highly effective to meet its goals. The City should create policies outlining circumstances in the future in which IMTs could be used to effectively prepare for and respond to emergencies other than fires, as well as procedures for deploying them.

The City's Incident Management Team worked effectively to coordinate and collaborate efforts between departments to clean infrastructure damage in the communities highly impacted by the floods.

Once the City's IMT was mobilized, it allowed departments to work together to systematically clear and repair roads and storm channels in the neighborhoods most impacted by the floods. **Exhibit 18** shows the two areas where the City deployed the IMT. In the first days of the flood response, before the IMT was operating, departments were working individually to address infrastructure damage. The IMT aligned

departments' efforts so they could carry out cleanup efforts in a faster, more systematic way. For example, IMT staff said the San Diego Police Department (Police) ensured streets were clear of cars, the Environmental Services Department then cleared the debris from the streets, and then the Stormwater Department was able to access the storm drains and channels.

Exhibit 18

The IMT was Responsible for Responding to Infrastructure Damage in Two Designated Areas in Southeast San Diego
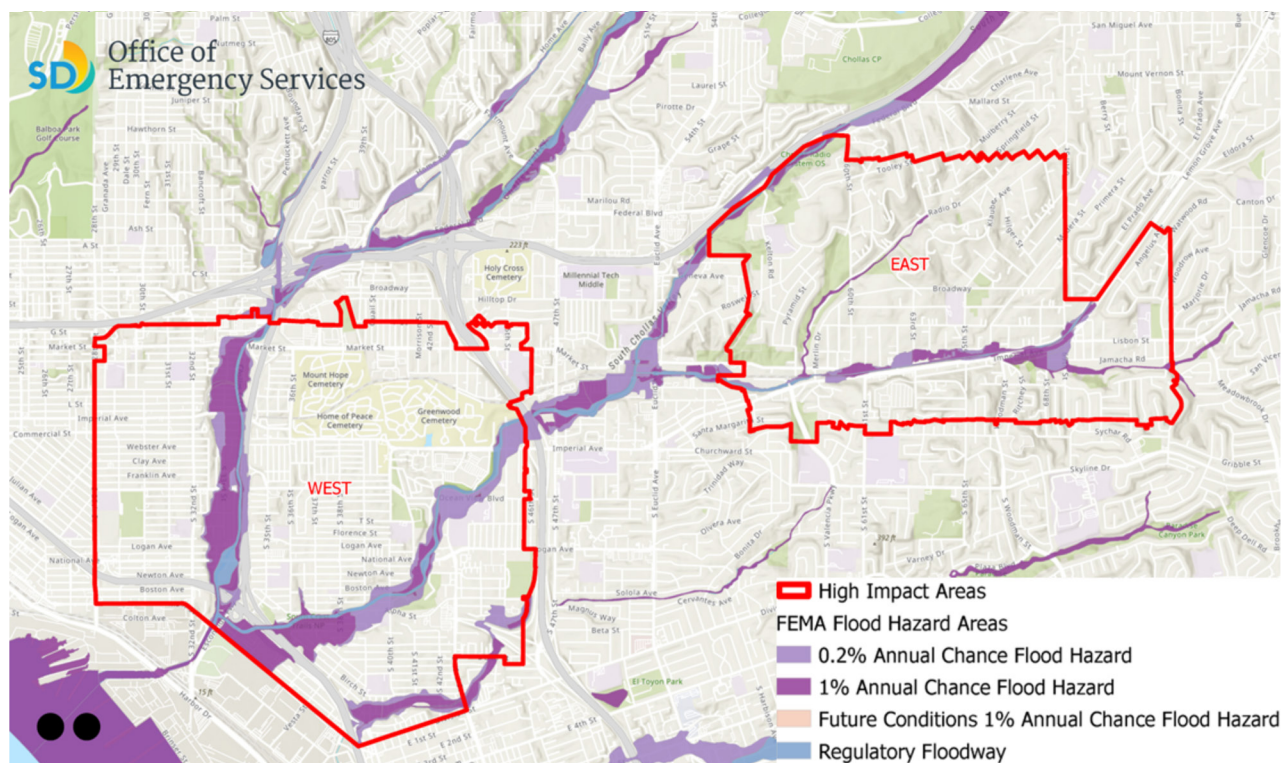
Source: City's Office of Emergency Services.

The IMT also ensured departments shared resources. Although individual departments may not have had the right equipment or enough equipment to clear streets and storm channels quickly, the IMT was able to pool resources from across departments to quickly obtain the necessary equipment and vehicles. Quick response was especially important because a second storm was forecasted to arrive, bringing the potential for additional flooding. By having policies and procedures in place to mobilize an IMT in preparation for and in response to disasters, the City can ensure it responds quickly and effectively.

The City did not have a list of pre-identified staff to fill the different department positions in the IMT, which resulted in delays staffing the IMT, according to IMT leadership.

According to IMT leadership, the IMT was delayed in beginning its operations because some roles took multiple days to fill with appropriate staff. The delays did not prevent the IMT from meeting its objectives and preparing for the subsequent storms, but delays could be minimized in future responses by training City Management on the IMT's role and pre-identifying staff for the IMT.

City Management was unfamiliar with the IMT's role and function.

According to the City's After-Action Report, City Management's unfamiliarity with the role of the IMT led to delays in obtaining a fully staffed and operational IMT.[23] According to the leaders of the IMT, the IMT needed department representatives who had both knowledge of their department's resources and decision-making authority to deploy those resources. However, department directors outside of the Police and Fire-Rescue departments were unfamiliar with the role and function of the IMT. Because of this, some department directors sent representatives who did not have the needed information and authority to be fully effective within the IMT structure. IMT leaders said that these staff then had to be replaced or obtain necessary information or approval from their department leadership, both of which resulted in delays in fully staffing the IMT and getting the response started.

> *Some department directors sent representatives who did not have the authority to be effective in the IMT.*

Having policies and procedures to pre-identify appropriate individuals to staff the IMT would ensure the IMT can quickly mobilize in future disasters.

According to Office of Emergency Services (OES) staff, OES had pre-identified individuals to fill key positions in the IMT but had not done the same for general department staff positions in the IMT. For example, representatives from the Public Utilities, Environmental Services, Stormwater, and Transportation departments had not been pre-identified for the IMT, and the IMT needed those representatives to provide information on resources available and to make decisions. According to the National Incident Management System, organizations should predesignate persons to fill the IMT. OES maintains a roster

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23 An After-Action Report is a document that outlines strengths, areas for improvement, potential best practices, as well as potential recommended actions after an emergency or training exercise.

of staff to fill positions in the Emergency Operations Center and decides the appropriate positions to call in to report to the Emergency Operation Center based on the disaster. The City should do the same for the IMT.

Training for City leadership and staff would clarify the role of the IMT, minimizing confusion and requests for actions outside of the IMT's scope.

According to the City's After-Action Report and staff in both the IMT and Emergency Operations Center, City leadership and some staff did not understand initially how the IMT's role differed from the role of the Emergency Operations Center. This created confusion when staff did not understand where to report or who to take directions from. According to the After-Action Report, training and exercises could provide an understanding of the different roles of the IMT and Emergency Operations Center.

Policymakers' requests to the IMT conflicted with the IMT's operational goals.

The IMT also received many requests from policymakers that did not align with the IMT's objectives. According to IMT and OES staff, the Mayor's Office and Council Offices requested that the IMT provide services that were outside of or conflicted with the IMT's responsibilities. For example, the IMT reported receiving requests to deliver sandbags to impacted residents and to provide dumpsters in specific locations. These requests conflicted with the IMT's operational goals, as the IMT was designed to focus on infrastructure preparation and made operational decisions like the placement of dumpsters based on overall need in the area. Establishing trainings for the Mayor's Office and Council Offices could help clarify the role of the IMT compared to the City's response overall.

Requests from policymakers directly to IMT staff also led to challenges. Several staff said that managing multiple, sometimes conflicting requests led to confusion and frustration, as it was unclear who they should take direction from. Staff said they did not want to say "no" to elected officials or their staff, but they also had specific directions from their supervisor. One of the management characteristics of the National Incident Management System is the Unity of Command, which means that each individual reports to only one designated supervisor, as shown in **Exhibit 19**. The IMT created a liaison position for these requests, but it did not fully address the issue. Trainings for policymakers and their staff on the emergency response structure, as well as an established role for the Mayor's Office on the IMT roster, could help ensure these requests are directed to the best point of contact and minimize similar challenges on future responses.

Exhibit 19

Individuals Within an Emergency Response Structure Should Only Have One Designated Supervisor
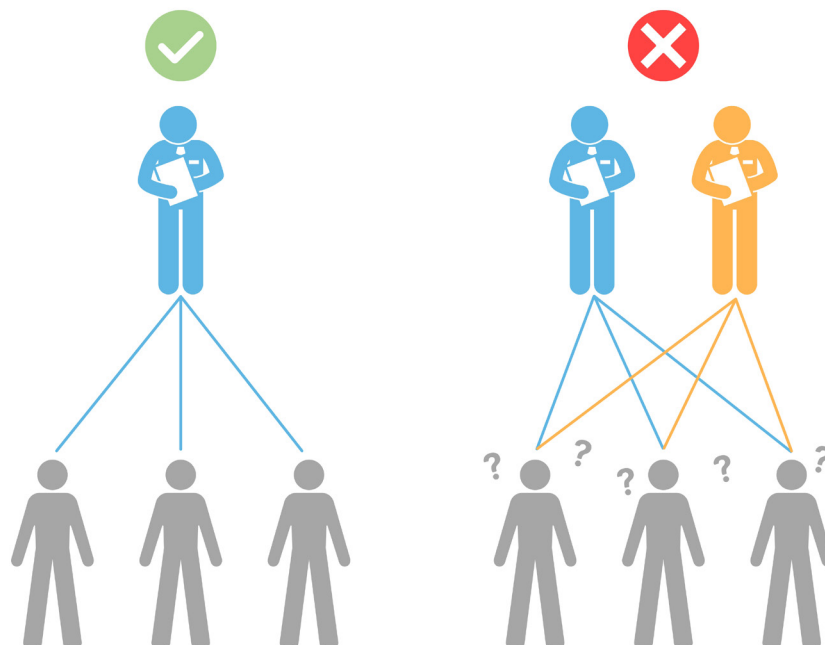
Source: OCA generated based on review of the National Incident Management System and interviews with the City's IMT.

A written delegation of authority that sets out the IMT's authority and responsibilities could also clarify the IMT's role, minimizing requests outside of its scope.

Although the IMT was deployed to respond to infrastructure damage in the impacted communities, it did not have written delegation of authority. According to FEMA, the Mayor can grant the delegation of authority to the leaders of an IMT either verbally or in writing. FEMA reports that the delegation of authority for IMTs allows IMT leadership to assume charge over the incident, and that the delegation of authority should include elements such as:

- Legal authorities and restrictions;
- Financial authorities and restrictions;
- Reporting requirements;
- Demographic issues;
- Political implications;
- Agency or jurisdictional priorities;
- A plan for public information management;

- A process for communications;
- A plan for ongoing incident evaluation; and
- Goals the IMT plans to achieve before it transfers or releases charge.

According to IMT leadership, a written delegation of authority would have established expectations, constraints, and a clear set of parameters for the IMT's scope of work, which could have helped avoid or deter requests outside the IMT's scope of work. It would have also conveyed key information like an expected budget and communications process. When establishing the policies and procedures for using IMTs for emergencies other than fires, the City should require a written delegation of authority when possible.

Recommendations

To ensure the City can deploy an incident management team quickly and efficiently, we recommend:

Recommendation 3.1 (Priority 3)

The City should develop and document policies and procedures for mobilizing an incident management team (IMT) in emergency planning and response, including emergencies other than fires. These policies and procedures should include, at minimum:

a. A requirement that the IMT have a written delegation of authority and the minimum elements required to be in the written delegation of authority;

b. A roster of staff for the functions of the IMT;

c. A process to periodically review the roster for the IMT to ensure it is up to date; and

d. Training requirements for IMT roster members related to their functions on the IMT.

Management Response: Agree [See full response beginning on page 87.]

Target Implementation Date: July 2026

Recommendation 3.2 (Priority 2)

The City should develop and deploy training on the Incident Management Team structure, its purpose, and how it fits into the overall emergency response structure for the Emergency Operations Center roster and Incident Management Team roster members, City leadership (such as department directors and deputy or assistant directors), and City Council Offices. The training requirement and frequency should be included in the training structure established in Recommendation 4.6.

Management Response: Agree [See full response beginning on page 87.]

Target Implementation Date: July 2026

Finding 4

Increasing staff training and tracking lessons learned from previous disasters can help the City prepare for future disasters.

Finding Summary

Although in previous findings in this report we outline areas that should be clarified or added to the Emergency Operations Plan (EOP), during our review of the City of San Diego's (City) response and recovery efforts after the flood, we found that the City largely followed its current Emergency Operations Plan.

We identified several areas in which the Office of Emergency Services (OES) could improve its disaster planning and preparedness, but the areas identified did not have a significant impact on the overall flood response. The areas identified fall into three categories:

1. Emergency Operations Plan and Additional Planning;

2. Staffing and Training; and

3. After-Action Reports and Implementing Improvements.

We recommend OES update the plans, policies, and procedures relevant to these topics to align with best practices.

Emergency Operations Plan and Additional Planning

The Office of Emergency Services largely followed its Emergency Operations Plan.

The EOP provides an overview of the City's approach to emergency operations. It is a framework for the City to use in performing emergency functions before, during, and after an emergency event, natural disaster, or technological incident. We found that following the January 2024 storm, the Emergency Operations Center largely followed the policies outlined in the EOP. For example, the EOP states that the Emergency Operations Center is generally activated for events declared local emergencies and it is organized in accordance with the Standardized Emergency Management System. The Emergency Operations Center was activated during the floods on January 22, 2024, and the Mayor declared the floods an emergency the same day. The Emergency Operations Center was organized in line with Standardized Emergency Management Systems.

The Emergency Operations Plan includes outdated information.

However, we noted that the EOP includes some outdated information, such as the Emergency Operations Center's location. According to the California Office of Emergency Services, emergency plans should identify the primary and alternate Emergency Operations Center location.[24] The EOP lists the current primary location as the alternative location and therefore does not identify an alternate location. Other internal City documents, such as Administrative Regulation 1.02, related to the use of the City's Emergency Operations Center, and the Emergency Operations Center Manual, also list this information inaccurately. The plan also still refers to OES as the Office of Homeland Security, which should be updated to avoid confusion.[25] OES is in the process of updating the EOP and should include this information in its update.

The City's EOP would benefit from plans for donations and volunteer management.

The City's EOP and Emergency Operations Center Manual (Manual) include some information on donations and volunteer management, but neither document provides a comprehensive plan to manage donations and volunteers. According to the Federal Emergency Management Agency (FEMA) and the California Office of Emergency Services, local governments should develop volunteer and donation management plans before a disaster strikes so that the affected local government can efficiently and effectively manage volunteers and donated goods. Without a comprehensive plan to manage donations in place before the disaster, Mayor's Office staff felt the need for donation management was not addressed initially and therefore became involved in operations decisions, setting up the donation centers, as discussed in Finding 1.

Volunteers were essential in assisting the City with response efforts.

Staff also said that there was a need for a volunteer management position in the Emergency Operations Center due to the considerable amount of time and effort that it took to mobilize hundreds of volunteers. Volunteers from the Community Emergency Response Team and the AmeriCorps were essential in assisting the City with various response efforts, including donations. Currently, neither the EOP nor the Manual include a comprehensive plan to manage volunteers.

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24 In fiscal year 2022, the Emergency Operations Center was relocated to its current location.
25 In 2021, the Office of Homeland Security transitioned into the current Office of Emergency Services.

We found that the EOPs for the cities of Sacramento and Oakland have specific stand-alone plans for donation and volunteer management, as shown in **Exhibit 20**. Oakland's plan includes phases (i.e., preparedness, response—immediately after a disaster, response—several days after the disaster, and recovery) and the activities that should be carried out in each phase to support donations and volunteer efforts.

Exhibit 20

The Cities of Sacramento and Oakland Have Donation and Volunteer Management Plans that San Diego Could Emulate to Follow FEMA Best Practices

Best Practices	City of Oakland	City of Sacramento	City of San Diego
Establish and detail plans for managing donations and volunteers	✓	✓	✗
Establish roles and responsibilities for the city and city departments	✓	✓	✗
Identify community-based organizations	✓	✓	✗
Specify roles and responsibilities for community-based organizations	✓	✓	✗
Specify timeframes for the activities that should be done before, during, and after a disaster	✓	✗	✗

Source: OCA generated based on review of the City's Emergency Operations Center Manual, the Emergency Operations Plan, FEMA's Volunteer and Donations Management Support Annex, and the California Office of Emergency Services Volunteer and Donations Management Planning Guidance.

The City's emergency response would also benefit from additional planning on information gathering techniques to increase situational awareness.

According to FEMA, situational awareness involves gathering, recording, and analyzing information to understand the size and complexity on the effects of the incident so that decisionmakers can make the best possible decisions. To gain situational awareness, the City used data from the County of San Diego's Crisis Track system, reports from Get It Done, floodplain maps, and information gathered from teams in the field.[26]

> *Get It Done and Crisis Track data were essential to understanding the flood's impact.*

Information on the damage caused by the storm collected through Get It Done and Crisis Track was essential to understanding the flood's impact. However, the City did not have a plan prior to the disaster to collect and analyze the data. Emergency Operations Center staff that mapped the impact areas said that not having a plan and method in advance to get access to and use these data sets in a workable manner created delays and concerns about the data quality. Although the issues did not result in major negative impacts, the City could streamline the process and mitigate data quality and data sharing concerns by working with the County of San Diego on a Crisis Track data sharing agreement. Similarly, OES should work with City Get It Done staff to plan for how Get It Done could best be used to collect and provide disaster impact information to the Emergency Operations Center.

Staffing and Training

The City informs new and promoted employees of their potential duties and responsibilities as Disaster Service Workers, but more detailed information and annual refreshers could increase readiness.

The City does not periodically inform all staff of their potential deployment as Disaster Service Workers and how deployment would change their work activities, schedule, work location, and reporting supervisor, so that staff are prepared to respond when called upon. Employees who are new to City service are informed that they are

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26 The County of San Diego (County) activated Crisis Track to determine if the County should request state and/or federal assistance. Crisis Track is a disaster management software that helps local governments identify disaster costs and complete FEMA paperwork for faster disaster assistance. Crisis Track helps local governments capture initial reports of damage from the public, estimate debris removal costs, and monitor debris removal operations.

Disaster Service Workers when they take their oath and during new employee orientation. This presentation includes high-level information on work requirements and activities or roles staff may be asked to perform during disasters, as well as who to contact and what to do during disasters to prepare for potential deployment. However, many staff may work at the City for years before there is a deployment of Disaster Service Workers and therefore may not recall information provided when they were first hired.[27] In fact, during the flood response, staff reported some confusion among City employees about how their assignment as a Disaster Service Worker would temporarily change their normal work schedule, work location, and reporting supervisor.

Staff reported confusion among City employees about how disaster work would impact their work location and hours.

Other municipalities require staff to complete initial and annual trainings on their role as Disaster Service Workers. For example, both the City of Los Angeles and the City and County of San Francisco require their staff to complete initial and periodic trainings on Disaster Service Worker activation. Los Angeles requires new civilian staff to complete one-time training at the start of their employment that covers:

- Which employees are Disaster Service Workers;
- An overview of the Disaster Service Worker Program;
- Types of Disaster Service Workers;
- General duties;
- Training requirements; and
- Preparedness resources and tips.

Los Angeles also annually requires all employees to watch four video courses as a refresher on their role as Disaster Service Workers. For employees who will be assisting during emergencies, the City of Los Angeles requires that they complete a training on how to communicate and interact with people with disabilities and others with access and functional needs, in addition to completing the other Disaster Service Worker trainings.

To ensure staff are trained and ready to serve when activated to serve as Disaster Service Workers, the City should create a mechanism

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27 If staff are promoted to management, the City guidebook for staff who are promoted to management positions includes some information on Disaster Service Worker designation, but it is limited. For example, the guidebook includes a reference to City employees being considered Disaster Service Workers while assigned to the Emergency Operations Center, but it does not include information such as the type of activities or work that staff may be asked to do.

to periodically train staff on their roles and responsibilities and share information on what staff should expect in terms of working conditions.

The Emergency Operations Center roster is not currently up to date, and as a result, there is a risk that response efforts could be delayed.

OES maintains a list of positions in the Emergency Operations Center and the identified staff who will fill those positions when needed. The City's Emergency Operations Center Manual says that each position should have three identified staff to ensure adequate coverage in the Emergency Operations Center. As shown in **Exhibit 21**, we found that of the 51 positions on the roster, 25 positions did not have three current City staff identified. However, just 9 of these 25 positions were fully vacant. The remaining 42 positions on the roster had at least one City staff member identified to fill the position.[28]

OES said that 5 of the 9 positions that were fully vacant were added after the January 2024 storm and that it is working with the Library Department to identify staff to fill these positions. Additionally, OES cannot predict and control when staff leave City employment.

However, the City guidebook for staff who are newly appointed to management positions indicates that OES updates the roster on a quarterly basis. OES should update the roster to ensure there are sufficient staff identified and trained to staff the Emergency Operations Center for the next disaster response. OES should also update its policies and procedures to ensure the roster is updated quarterly and remove any staff who have left City employment.

*OES said that 5 of the 9 positions that were fully vacant on the roster were added after the January 2024 storm.*

28 By "current City staff," we mean staff who were listed in SAP as currently working for the City when OES provided the roster. OES provided the roster to OCA on February 20, 2025.

Exhibit 21

Of the 51 Positions on the City's Emergency Operations Center Roster, 25 Positions Did Not Have Three Current City Staff Identified to Fill the Position as of February 2025

26 positions filled   **9 positions 2/3 filled**   **7 positions 1/3 filled**   **9 positions vacant**
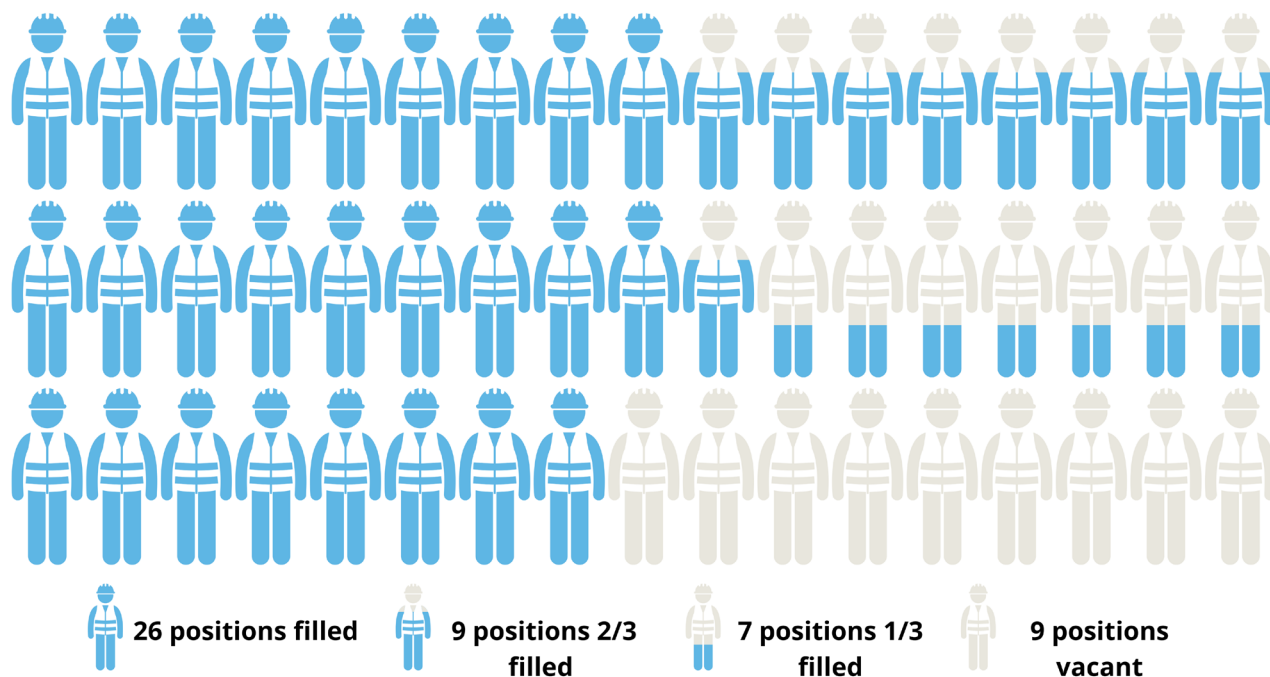
Source: OCA generated based on the Emergency Operations Center roster as of February 20, 2025, and staffing data from SAP as of February 19, 2025.

OES does not have a mechanism to ensure staff on the Emergency Operations Center roster have received necessary training.

Staff on the Emergency Operations Center roster should be trained on their role in disaster response. According to the Emergency Operations Center Manual, OES should provide quarterly training for Emergency Operations Center staff to provide a continuous opportunity for staff to become familiar with Emergency Operations Center policies and procedures. However, based on our analysis, of the 106 City staff identified to fill positions on the Emergency Operations roster, we found OES only had a record of 73 percent either attending a training or having reported to the Emergency Operations Center during the flood response.[29] That means about one out of four staff on the roster may not be familiar with the Emergency Operations Center and

29 Because reporting to the Emergency Operations Center during the January 2024 flood response would indicate at least some familiarity with the Emergency Operations Center procedures, our analysis included those who reported to the Emergency Operations Center as having fulfilled the training requirement.

therefore their response in an activation may be delayed. By tracking and ensuring that staff on the Emergency Operations Center roster receive required trainings, OES can ensure that Emergency Operations Center staff are prepared to respond to disasters.

An overall system to assign and track required training for City staff, based on their role, would help OES ensure training requirements are met and increase disaster response readiness.

Training is essential at all levels of government to ensure that personnel responding to disasters are operationally ready. As discussed above, in Finding 1, and in the City's After-Action Report for the floods, a lack of understanding about the City's overall emergency response structure and each group's roles and responsibilities in an emergency response can create delays and confusion. The City should address this by creating an overall training structure that assigns required trainings to individuals based on their role in the City and by tracking that training requirements have been met. For example:

- **Disaster Service Workers:** City staff are Disaster Service Workers and therefore should be provided training periodically on their designation, what their roles and responsibilities could be, how they will be informed of being activated, and how activation may affect their working hours, schedule, and supervisor. The training could also include basic information on the City's overall emergency response structure, the differences between the Emergency Operations Center and the Incident Management Team, and the recommended framework clarifying the City's overall role in disaster response and recovery.

- **Assigned Emergency Operations Center roster and Incident Management Team roster staff:** This training could build on the basic Disaster Service Worker training and OES' existing roster training to ensure staff on the assigned roster know their specific roles and any specialized information needed to prepare to fill a roster seat. The overall training structure could be a mechanism to effectively track that roster seats are filled with current staff and that those staff have received the necessary trainings.

- **Department directors and deputy/assistant directors:** In addition to the basic Disaster Service Worker training, department directors and their deputies could have more specific training on the roles their department is assigned to in the Emergency Operations Plan and its annexes, such as the recommended

recovery plan. The training could ensure department directors and deputy/assistant directors know their staff's assignment on the Emergency Operations Center roster or Incident Management Team roster, if any, to confirm appropriate staff are assigned and to plan departmental continuation of operations without those staff.

- **City Council Offices, the Mayor's Office, and Deputy Chief Operating Officers:** In addition to basic Disaster Service Worker training, City leadership should have periodic training on their specific roles and responsibilities.[30] Adding these groups to the training structure would ensure OES can track the implemented policies related to trainings provided and trainings required had been met.

Best practices also dictate that the City host regular training exercises to ensure readiness, which OES has hosted recently and plans to conduct more consistently in the future. The City's After-Action Report also highlights the need for training and notes that the City should conduct two training exercises annually to increase disaster response readiness. To ensure this goal is met, the training structure could also document planned training exercises, the different goals or areas of response the training exercise covers, and the parties invited to attend and in attendance, which could include elected officials and their staff and non-governmental organizations, such as community groups.

After-Action Reports and Implementing Improvements

OES does not have a policy ensuring it consistently drafts After-Action Reports, which are essential documents that help identify opportunities to improve disaster planning, mitigation, response, and recovery efforts.

Although After-Action Reports are crucial for improving emergency management efforts, the City does not have a policy ensuring it consistently drafts After-Action Reports. An After-Action Report is a document that identifies an agency's strengths and gaps in disaster response efforts, with the goal of improving future responses. California regulations only require local governments to complete an After-Action Report when both the local and State government declare an emergency for the same disaster. According to FEMA, organizations may also choose to complete After-Action Reports after training

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30 Training for City Council Offices and the Mayor's Office is discussed more in detail in Finding 1 of this report.

exercises to help assess, validate, and address areas for improvement. Despite the value of After-Action Reports, OES does not have a policy detailing when it should write After-Action Reports, such as after the Emergency Operations Center activates at a certain level or after certain types of training exercises, like hands-on training.

OES does not have a mechanism to ensure recommendations and areas of improvement found in After-Action Reports are tracked and implemented.

We found that, generally, OES does not have a plan to ensure it addresses recommendations and gaps in response efforts identified in After-Action Reports. In our review of seven After-Action Reports, we found that only three included a plan to address issues and gaps in actual and hypothetical response efforts. According to FEMA, organizations benefit from establishing a process to finalize, track, and implement recommended actions to address problems that could limit an organization's operational effectiveness. Emergency plans for other municipalities require that they complete improvement plans to mitigate the impact future disasters may have on their government operations or the community. For example, emergency plans for the cities of Los Angeles, San Jose, and Austin and for the City and County of San Francisco require improvement plans.

Exhibit 22 shows an example of an After-Action Report that specifies the needed corrective actions, the department responsible for addressing the corrective action, and the expected completion date.

Exhibit 22

The San Diego County Hepatitis A Outbreak After-Action Report Specifies the Recommended Corrective Actions, Identifies the Agency Responsible for Addressing the Corrective Action, and Includes the Completion Date

ACTION PLAN				
#	Issue	Recommendation	Responsible Agency/ Department	Completion Date
1	In the San Diego HAV outbreak, the County led meetings, outreach and communication to coordinate actions with cities and other jurisdictions. However, a more formal incident management structure would improve coordination in future outbreaks, facilitating swift coordinated decision making. Convening a policy group of County and regional leadership from affected cities as a regular part of the County's incident command system is an essential element that should be added in future responses.	For future public health outbreaks with the potential for regional impacts, the County should enhance its use of incident management structures to coordinate regional actions. One key structure should be a policy group of County and regional executive leadership from affected jurisdictions that convenes regularly during the outbreak.	HHSA	By 11/30/2018: Develop a protocol that directs the convening of a Policy Group upon use of an Incident Command System for a public health threat

Source: Excerpt from the County of San Diego Hepatitis A Outbreak After-Action Report.

Because OES does not have a mechanism to ensure that recommendations and areas of improvement noted in Emergency Operations Center After-Action Reports are addressed, issues identified in prior After-Action Reports were also an issue in the City's response to the January storm. For example, the After-Action Reports from 2014 and 2023 noted issues with positions and seats in the Emergency Operations Center not being fully staffed during disasters. Although the repeated issues were minor and did not have a significant impact on the flood response, a plan to address problems and implement recommendations documented in After-Action Reports could help OES ensure that issues in After-Action Reports do not go unaddressed and re-emerge in future disasters.

Recommendations

To align OES policies, procedures, and plans with best practices for disaster preparedness, we recommend:

Recommendation 4.1   (Priority 3)

The Office of Emergency Services should update the City's Emergency Operations Plan to include the Office's current name and identify the current primary and alternate Emergency Operations Center locations.

Management Response: Agree [See full response beginning on page 88.]

Target Implementation Date: July 2026

Recommendation 4.2   (Priority 3)

The Office of Emergency Services should develop a donations and volunteer management plan, potentially as an annex or annexes to the City's Emergency Operations Plan.

Management Response: Agree [See full response beginning on page 88.]

Target Implementation Date: July 2026

Recommendation 4.3   (Priority 2)

The Office of Emergency Services should enter into negotiations with the County of San Diego to develop an agreement so the City can use Crisis Track in City emergencies and have expeditious access to Crisis Track data in the format necessary.

Management Response: Agree [See full response beginning on page 88.]

Target Implementation Date: December 2025

Recommendation 4.4 (Priority 2)

The Office of Emergency Services should work with the Performance and Analytics Department to create a plan for gathering, accessing, and using data from Get It Done reports or from a similar program, that could provide information to increase situational awareness during an emergency.

Management Response: Agree [See full response beginning on page 88.]

Target Implementation Date: July 2026

Recommendation 4.5 (Priority 2)

The Office of Emergency Services should develop policies and procedures to review and update the Emergency Operations Center roster quarterly and track training information on each roster member to ensure that staff on the roster are appropriately trained.

Management Response: Agree [See full response beginning on page 89.]

Target Implementation Date: September 2025

Recommendation 4.6 (Priority 2)

The Office of Emergency Services should should continue its work to develop a training program for City leadership and staff on the City's emergency response protocol.

a. The training program should be tiered depending on the staff's role and list required training topics to be covered for each tier. For example, training for all City employees should cover high-level information about the City's role in a disaster, the Emergency Operation Center's role, an Incident Management Team's role, the incident command structure, and what elements of their job may change if they are activated as a Disaster Service Worker. Members on the Emergency Operations Center roster and Incident Management Team roster would have the general City staff training and more detailed trainings on their specific roles and responsibilities. The Mayor's Office's training and City Council Offices' training would have the general City staff training and information covered in Recommendation 1.3 and Recommendation 1.4, respectively.

b. The training program should detail when employees should receive the trainings. At minimum, all City staff should receive basic refresher trainings on their potential assignment as a disaster service worker annually.

c. The training program should have a mechanism to track which employees have and have not completed the required trainings, similar to other mandatory City trainings.

Management Response: Agree [See full response beginning on page 89.]

Target Implementation Date: July 2026

Recommendation 4.7   (Priority 2)

The Office of Emergency Services should create policies and procedures to hold emergency response trainings at least twice per year, in line with its current goals. The policy should ensure the types of trainings vary from tabletop exercises to full simulations and that the disaster types vary as needed as well. The policy should ensure the Mayor's Office and City Council Offices are invited to attend.

Management Response: Agree [See full response beginning on page 89.]

Target Implementation Date: July 2026

Recommendation 4.8   (Priority 2)

The Office of Emergency Services (OES), in collaboration with relevant departments and agencies, should establish policies and procedures to track and report on the implementation status of recommendations and corrective actions in the After-Action Reports OES completes. The policies and procedures should include:

a. When OES will draft After-Action Reports (such as after the Emergency Operations Center activates at a Level 1 or 2 and after simulation trainings);

b. Who the reports will be provided to;

c. A process for identifying corrective actions and assigning corrective actions to the responsible City department; and

d. A process for tracking improvement progress to ensure that corrective actions are implemented.

Management Response: Agree [See full response beginning on page 90.]

Target Implementation Date: July 2026

Appendix A
Definition of Audit Recommendation Priorities

Objective

The Office of the City Auditor maintains a priority classification scheme for audit recommendations based on the importance of each recommendation to the City, as described in the table below.

While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration's responsibility to establish a target date to implement each recommendation, taking into consideration its priority. The City Auditor requests that target dates be included in the Administration's official response to the audit findings and recommendations.

PRIORITY CLASS*	DESCRIPTION
1	Fraud or serious violations are being committed. Significant fiscal and/or equivalent non-fiscal losses are occurring. Costly and/or detrimental operational inefficiencies are taking place. A significant internal control weakness has been identified.
2	The potential for incurring significant fiscal and/or equivalent nonfiscal losses exists. The potential for costly and/or detrimental operational inefficiencies exists. The potential for strengthening or improving internal controls exists.
3	Operation or administrative process will be improved.

* The City Auditor is responsible for assigning audit recommendation priority class numbers. A recommendation that clearly fits the description for more than one priority class shall be assigned the higher priority.

Appendix B
Audit Objectives, Scope, and Methodology

Objective

In accordance with the Office of the City Auditor's approved Fiscal Year (FY) 2025 Audit Work Plan, we conducted a performance audit of the City's disaster preparedness and response operations. Our audit included the following objectives:

1. In response to the January 2024 floods, determine if the City's overall disaster planning and preparedness efforts aligned with best practices and positioned the City to:

   a. Respond effectively, meeting the basic needs of affected residents, including those with access and functional needs;

   b. Facilitate recovery, including restored housing and economy;

   c. Coordinate with key stakeholders; and

   d. Communicate with policymakers, City leadership, and the public.

2. Determine if roles and responsibilities for response and recovery were clear between the City, the County of San Diego, and other stakeholders.

3. Determine if any changes are necessary to the City's disaster planning and preparedness efforts to respond effectively to and facilitate recovery from future major emergencies and disasters.

Scope

Our analysis primarily focused on the City of San Diego's (City) disaster response and recovery efforts from the January 22, 2024, rain and flood event related to our objectives. In certain instances, our analysis included data from previous emergencies dating back to 2014. For example, to determine whether the Office of Emergency Services (OES) developed plans to address recommendations or gaps in the City's disaster response efforts we reviewed After-Action Reports from 2014 through 2024.[31] Our review also included data through February 2025 to determine the impact of the storm and whether the roster for staffing the Emergency Operations Center was up to date.

Our audit scope did not include objectives to determine the cause of the floods or determine whether stormwater activities were appropriately conducted prior to the floods. Our audit scope

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31 In 2021, the Office of Homeland Security transitioned into OES. Our review of After-Action Reports from 2014 through 2021 included those that were drafted by the former Office of Homeland Security.

also did not include assessing rescue activities carried out by the Fire-Rescue Department or San Diego Police Department. Finally, our scope did not include assessing the quality of services provided by entities other than the City of San Diego, such as the County of San Diego, State of California, the Federal Emergency Management Agency (FEMA), the American Red Cross, Voluntary Organizations Active in Disaster (VOAD), or other non-governmental organizations.

Methodology

To determine if the City's disaster planning and preparedness efforts aligned with best practices, we:

- Conducted 61 interviews with more than 100 unique individuals, including:
  - The Mayor's Office
  - City Council Offices
  - The City's Executive Team
  - City staff from:
    - Office of Emergency Services
    - City Planning Department
    - Communications Department
    - Economic Development Department
    - San Diego Fire-Rescue Department
    - Department of Finance
    - Department of Information Technology
    - Homelessness Strategies and Solutions Department
    - Human Resources Department
    - Parks and Recreation Department
    - Performance and Analytics Department
    - San Diego Police Department
    - Purchasing and Contracting Department
    - Stormwater Department
  - Representatives from other organizations, including:
    - American Red Cross
    - County of San Diego Office of Emergency Services
    - Harvey Family Foundation
    - Jackie Robinson Family YMCA
    - Legal Aid Society of San Diego
    - San Diego Foundation

- San Diego Housing Commission
- San Diego Humane Society
- San Diego Voluntary Organizations Active in Disaster

- Collected input from affected communities and residents by attending community flood relief meetings that included affected.
- Reviewed videos of recorded City Council, City Council Committee, and County of San Diego Board of Supervisors meetings related to the flood response, including public comments.
- Attended a flood training tabletop exercise hosted by the City's Office of Emergency Services.
- Reviewed national trainings on emergency response and the incident command structure.
- Reviewed State of California guidance related to the Standardized Emergency Management System and After-Action Reports.
- Reviewed information and best practices on topics such as disaster recovery, public communication, donation management, and local assistance centers published by:
  - California Office of Emergency Services
  - Federal Emergency Management Agency
  - International City/County Management Association
- Reviewed the Operational Area Emergency Operations Plan and Recovery Plan.
- Reviewed existing City policies and regulations relevant to the Emergency Operations Center and Citywide emergency response.
- Reviewed City emergency plans including the Emergency Operations Plan, the Emergency Operations Center Manual, and the Local Assistance Center Manual.
- Reviewed After-Action Reports from the City Office of Emergency Services (formerly Office of Homeland Security) from 2014 through 2024.
- Reviewed internal documents relating to the January 2024 floods, including situation reports.
- Reviewed public communications from the flood response, including press releases, social media posts, and flyers.
- Reviewed the City's and County of San Diego's After-Action Reports for the January 2024 storm.
- Reviewed City budget presentations on the expenditures for the flood response.
- Reviewed the City budgeted expenditures for OES for FY2025.
- Benchmarked the Offices of Emergency Services' approach for emergency preparedness, response, and recovery with:
  - County of Los Angeles

- County of San Diego
- City and County of San Francisco
- City of Austin
- City of Houston
- City of Los Angeles
- City of Oakland
- City of Sacramento
- City of San Jose

- Analyzed the Emergency Operations Center roster and compared it to SAP's list of existing City staff at the time to determine if the roster was up to date.
- Analyzed the Emergency Operations Center roster and compared it to attendance sheets for trainings and Emergency Operations Center logs during the 2024 flood response to determine if roster staff had received required trainings.

Data Reliability

The audit objectives, findings, and recommendations relied primarily on qualitative data analysis. We compiled most of the audit's core qualitative data primarily through semi-structured interviews with representatives from the entities listed in the sections above. We also incorporated our field observations by, for example, attending or viewing group community meetings, City Council meetings, County of San Diego Board of Supervisors meetings, and emergency response trainings. Due to the nature of the flood event, the interviews were central to developing our understanding of the response and in developing the audit findings and recommendations. Interviewees' opinions, perspectives, and recollections of the emergency response varied. The semi-structured interviews we conducted included at least two audit staff to ensure a consensus understanding of those discussions. To the extent possible, we triangulated differences of opinion and statements from the interviewees through follow-up interviews and the assessment of documents applicable to the subject matter. The resulting qualitative analyses enabled us to address the audit objectives, findings, and recommendations, and we determined that the qualitative data summarized throughout the report were sufficiently reliable for the purposes of this audit.

Internal Controls Statement

We limited our review of internal controls to specific controls relevant to our audit objectives, described above. We reviewed emergency response and recovery policies and procedures, emergency operations plans, staff training materials, and state and federal regulations and best practices.

Compliance Statement

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 based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: June 20, 2025

TO: Andy Hanau, City Auditor, Office of the City Auditor

FROM: Chris Heiser, Executive Director, Office of Emergency Services
             via Kristina Peralta, Deputy Chief Operating Officer, Office of the Mayor

SUBJECT: Management Response to the Office of the City Auditor's Performance Audit of
             the City's Disaster Response

This memorandum serves as the management response to the Performance Audit of the City's Disaster Response (Performance Audit). At the time this response was written, the draft Performance Audit provided to management contained four findings and 23 recommendations. Department staff and management appreciate the Performance Audit prepared by the Office of the City Auditor and thank the staff involved.

Management agrees with the recommendations within the Performance Audit and this response highlights those recommendations that will need additional resources and policy direction to implement.

The Performance Audit of the City's disaster response identifies that, while policies and procedures were in place and followed, there were best practices that did not match public expectations during the disaster. A common understanding of senior leaderships' intent needs to be aligned with government capabilities as well as ongoing revisions to policies through after-action reviews, and feedback to meet evolving community needs. Effective coordination among all levels of government, responders, and individuals is crucial but remains a challenge. There are 23 recommendations that reflect the complexity of the event, and the areas impacted, requiring significant coordination and potential financial implications. Changes in governmental policies, particularly regarding Federal Emergency Management Agency (FEMA) disaster support, should inform future discussions and recommendations.

RECOMMENDATION 1.1: The Mayor's Office should work with the City Council, Office of Emergency Services, other relevant departments, and other stakeholders to develop a framework that clearly sets out the City's overall planned role in disaster response and recovery. The framework should address key questions raised during the January 2024 flood response, including:

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    a.   What types of short-, intermediate-, and long-term recovery needs will the City plan to meet, and in what instances?

    b.   Does the City expect short-, transitional-, and/or long-term shelter services for its residents?

    c.   Does the City expect non-congregate shelter options for its residents, and if so, in what instances?

    d.   Does the City expect mass care services for affected residents who choose to stay in their homes?

    e.   If the relevant stakeholders do not plan to meet the expected needs, does the City plan to provide those care and shelter services itself?

    f.   What information does the City expect to have about residents' needs, and what method or methods would the City use to collect that information?

The framework should also outline, at a high-level, the roles expected of external entities like the County of San Diego, the Operational Area, the State, FEMA, and individuals, businesses, and non-governmental organizations. While it will not direct these entities, the framework will clarify where the City expects certain needs to be met based on laws, agreements, and coordination.

The goal of the framework is to establish internal consensus on the City's overall response and recovery roles and communicate this to City Council, non-governmental organizations, and the public before emergencies arise, ensuring clear expectations. Management should present the framework to City Council, including potential costs of any additional roles the City plans to take on in future emergencies.

Once the City establishes the framework, the City should develop and publish a clear, easy-to-understand document that communicates the framework and outlines the City's overall planned role, as well as the expected roles of other stakeholders, for use by City leadership and the public. (Priority 1)

Management Response: Agree with the recommendation. The Office of Emergency Services (OES) will assist and advise the Mayor and relevant stakeholders in development of a framework through the City of San Diego Disaster Council (SDMC §51.0103) to develop and publish disaster recovery policy guidance specific to the City of San Diego that will reflect the Operational Area's (OA) Recovery Plan and FEMA recovery guidance utilized during storm recovery efforts. It will outline City-specific roles across all phases of recovery to include sheltering, mass care, and public information.

The framework will also support the development and publication of a clear, accessible summary that outlines the City's planned role in disaster response and recovery and will communicate expectations to City Council, stakeholders, and the public.

Several elements of the framework, including sheltering operations, expanded care services, and information gathering, have significant financial implications and will require input from policymakers for guidance. These considerations may extend the timeline for implementing changes to policies and operational planning. For example, the City is not currently authorized under its existing budget structure to fund non-congregate sheltering (e.g., hotel stays for displaced individuals). If this approach is to be pursued, further legal analysis, policy direction, and resource planning will be necessary. OES recommends that

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this effort be informed by best practices, legal review, and a cost-benefit analysis to ensure feasibility and sustainability. Given the scope and complexity of this deliverable, completing the summary may also require dedicated City staff focused solely on its development and coordination.

The section of the San Diego Municipal Code on the Disaster Council is attached to this memo.

Target Implementation Date: As determined by the Mayor's Office

RECOMMENDATION 1.2: After the implementation of Recommendation 1.1, the Office of Emergency Services should create a City-specific recovery plan that establishes:

   a. When the plan will be activated;
   b. The short-, intermediate-, and long-term recovery activities the City plans to undertake, including those identified through Recommendation 1.1;
   c. The department or position responsible for overall oversight of the City's recovery activities;
   d. Recovery roles and responsibilities of different City departments;
   e. Expected roles and responsibilities of external agencies like the County of San Diego, the American Red Cross, and other non-governmental organizations; and
   f. How the City engaged with the community to develop the plan.

The Office of Emergency Services should update and present the plan to City Council at least every five years, in line with updates to the City's Emergency Operations Plan, and should also update it on an ongoing basis to incorporate best practices and lessons learned from exercises and activations. The plan should be posted publicly with other public City resources on disaster planning and preparedness and could be included in the City's Emergency Operations Plan as an annex. (Priority 1)

Management Response: Agree with the recommendation. OES will develop a recovery annex after receiving guidance from policymakers as outlined in Recommendation 1.1. This will align with the current OA Disaster Recovery Plan and reside as an annex to the City's Emergency Operations Plan (EOP) which is updated on a five-year cycle.

Target Implementation Date: Contingent on guidance provided by Recommendation 1.1

RECOMMENDATION 1.3: The Office of Emergency Services should work with the Mayor's Office to clarify how policy direction will be provided to the Emergency Operations Center, and clarify the Mayor's Office's responsibilities in emergency planning, response, and recovery. The clarified method and responsibilities should be documented in relevant policy or procedure, such as the Emergency Operations Plan or Manual. The identified necessary trainings to ensure the Mayor's Office is knowledgeable of its responsibilities should be documented and tracked as part of the broader training program in Recommendation 4.6. (Priority 2)

Management Response: Agree with the recommendation. OES will coordinate with the Mayor to clarify the language in the current EOP that describes existing roles and responsibilities of the Mayor, the Mayor's Staff, Policy Group, and City Council during a

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disaster. Training specific to these roles has been identified based on FEMA guidance for best practice which will be facilitated, documented, and tracked by OES.

Target Implementation Date: July 2026

RECOMMENDATION 1.4: The Office of Emergency Services, in consultation with the Mayor's Office and City Council, should propose to City Council a Council Policy, or other mechanism that requires City Council approval, that clarifies Council Offices' responsibilities in emergency planning, response, and recovery. The policy or mechanism should include, at minimum:

a. The formal roles and responsibilities of City Councilmembers and their staff. This could include activities in addition to their current roles, such as:
    i. Communicating public information provided by City operations to residents;
    ii. Working with impacted communities and community organizations to assess and communicate community needs; and
    iii. Encouraging community philanthropic activity.
b. The topics covered by training provided to City Councilmembers and Council Office staff. We recommend topics include:
    i. City Council Office roles and responsibilities in disaster planning, response, and recovery;
    ii. The City's and other organizations' roles and responsibilities in disaster planning, response, and recovery, including the framework established in Recommendation 1.1;
    iii. The overall emergency management structure under the Standardized Emergency Management System; and
    iv. The internal disaster-communications plan for City Councilmembers established in Recommendation 1.5.
c. When the City will provide training to City Councilmembers. We recommend the City provide training to City Councilmembers and their staff at least when Councilmembers are newly elected to City Council and upon request thereafter.
d. If and how often Councilmembers and/or their staff will plan to attend City emergency response tabletop exercises and other emergency response trainings or exercises. (Priority 2)

Management Response: Agree with the recommendation. OES, in consultation with the Mayor's Office and City Council, will propose a Council Policy or other appropriate mechanism that clarifies the roles and responsibilities of Councilmembers and their staff during disasters. These roles, along with related training requirements and frequency, will be codified in the EOP.

Target Implementation Date: July 2026

RECOMMENDATION 1.5: The Mayor's Office should work with the City Council to establish an internal disaster-communications procedure that details how and when City Council Offices can expect to be informed of emergencies and disaster response activities in and near their districts, and how City Council Offices can best communicate community needs to the City's emergency response structure. (Priority 3)

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Management Response: Agree with the recommendation. OES will coordinate with the Mayor's Office, City Council, and Communications Department to develop and codify internal disaster communication protocols in the EOP.

Target Implementation Date: July 2026

RECOMMENDATION 1.6: After the implementation of Recommendation 1.1, the Office of Emergency Services, in consultation with the Mayor's Office, the County of San Diego, the American Red Cross, and other stakeholders, should develop a Pre-Disaster Housing Plan. The plan could be an annex to the existing Emergency Operations Plan. The plan should include elements determined in Recommendation 1.1, as well as other elements, including but not limited to:

a. The City's role in providing short- and long-term shelter to disaster survivors, including in small- and large-scale disasters;
b. Circumstances when non-congregate shelter options may be sought and a plan for their provision;
c. Identified funding sources, including general cost estimates for City-provided shelter options;
d. How the City will ensure individuals with access and functional needs will be appropriately accommodated;
e. Consideration of federal, state, and local recovery programs when planning eligibility; and
f. How non-governmental organizations were involved in creating the plan and how they will be involved in its implementation. (Priority 2)

Management Response: Agree with the recommendation. OES will coordinate the development of a Pre-Disaster Housing Plan based on guidance established under Recommendation 1.1. In collaboration with the Mayor's Office, the County of San Diego, the American Red Cross, and key stakeholders, the plan will be incorporated as an addition to the existing Sheltering Annex of the EOP.

Implementation is expected to carry significant financial and policy implications, such as facility readiness, staffing, service delivery standards, and resource allocation. These factors may require MOAs or MOUs with partner agencies and emergency contracts for designated shelter sites. As a result, they may affect the plan's scope, timeline, and implementation.

Target Implementation Date: July 2026

RECOMMENDATION 1.7: The Office of Emergency Services should centralize on the City's public website City information related to disaster preparedness, response, and recovery. The site should include a public version of the framework developed in Recommendation 1.1 and additional disaster preparedness information, such as disaster-specific information on risk area, preparation, and response, like the examples provided from Houston and Los Angeles. (Priority 3)

Management Response: Agree with the recommendation. OES will establish internal protocols to periodically update its existing public-facing website to ensure it provides up-to-date disaster and emergency preparedness information. This will include incorporating the actions outlined in Recommendation 1.1.

Target Implementation Date: October 2025

RECOMMENDATION 1.8: The Stormwater Department should develop a policy detailing ongoing outreach to residents, property owners, and businesses within the floodplain.

  a. The outreach should, at minimum, inform the residents that they are in a floodplain, that normal insurance does not typically cover flood damage, and that flood insurance is available for both owners and renters.
  b. The outreach should include the public framework document created in Recommendation 1.7, or a similar document with the information clearly presented.
  c. The policy should detail how the Stormwater Department plans to conduct outreach and how often. (Priority 3)

Management Response: Agree with the recommendation. The Stormwater Department will develop a policy detailing ongoing outreach to residents, property owners, and businesses within the floodplain. The information in the policy will be modeled after the notifications sent to property owners in 2024, which provided important information about the limits of typical property insurance and guidance for obtaining flood insurance for both owners and renters. The policy will specify that outreach will include the public framework document created in Recommendation 1.7, or similar, as well as how often the Stormwater Department plans to conduct outreach.

Target Implementation Date: October 2025

RECOMMENDATION 1.9: The Office of Emergency Services should work with the Mayor's Office to develop a plan for building and maintaining relationships with non-governmental and community organizations involved in disaster response. This plan should identify points of contact, establish communication channels, identify relevant groups for participation in trainings, and include strategies for identifying and communicating with impacted community organizations working in active disasters. (Priority 2)

Management Response: Agree with the recommendation. OES will coordinate with the Mayor's Office to identify non-governmental and community organizations involved in disaster response and recovery for inclusion as part of a subcommittee to the City of San Diego's Disaster Council.

Target Implementation Date: July 2026

RECOMMENDATION 2.1: The Mayor's Office, in consultation with City Council and relevant departments, should determine if the City will use canvassing in future disaster responses.

If the Mayor's Office decides the City will use canvassing in future disaster responses, the Office of Emergency Services (OES) should outline in policy or procedure the general situations in which canvassing would be used.

Additionally, OES should create a canvassing plan and the plan should include, at minimum:

  a. A timeline for effective canvassing;

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   b. Considerations to mitigate repeat canvassing, including overlap with other
       canvassing efforts from other governmental or nongovernmental organizations;
   c. A plan to identify and address potential language and interpretation needs;
   d. A template of questions for collecting information that has been pre-approved by the
       relevant departments and includes a question about data sharing; and
   e. Guidelines and scripts for just-in-time training for canvassers. (Priority 2)

Management Response: Agree with the recommendation. Pending direction from the
Mayor's Office on the use of canvassing in future disaster responses, OES will develop a
supporting policy and procedure outlining when canvassing may be used.

The procedure will address key elements such as timelines, logistical coordination, just-in-
time training, culturally appropriate messaging in coordination with the Communications
Department, and guidance to minimize duplicative efforts. OES will present the policy and
procedure to the Policy Group for review and approval.

Target Implementation Date: July 2026

RECOMMENDATION 2.2: The Office of Emergency Services, in consultation with the Mayor's
Office and Communications Department, should create disaster messaging templates,
including pre-translated messages, for flyers and social media posts that may be necessary
during and after different types of disasters that the City can use to provide necessary and
timely information to the public. The templates should be pre-approved by relevant
departments when possible. (Priority 2)

Management Response: Agree with the recommendation. OES, in consultation with the
Mayor's Office and the Communications Department, will utilize FEMA guidelines and best
practices to develop pre-approved disaster messaging templates, including flyers and social
media content with pre-translated messages where appropriate. These templates will
support timely and accessible public communication before, during, and after various types
of disasters.

Target Implementation Date: July 2026

RECOMMENDATION 2.3: The Office of Emergency Services, in consultation with the
Communications Department, should update the Emergency Operations Plan and Emergency
Operations Center Manual to include plans and procedures that ensure all of its public
communications methods will meet residents' access and functional needs, including the
expeditious translation of written materials. (Priority 2)

Management Response: Agree with the recommendation. OES, in coordination with the
Communications Department and Human Resources Department, will update the Emergency
Operations Plan and Emergency Operations Center (EOC) Manual to include procedures that
ensure public communications are accessible to individuals with access and functional needs,
including the timely translation of written materials.

Target Implementation Date: July 2026

RECOMMENDATION 2.4: The Mayor's Office, in consultation with the Office of Emergency
Services and Communications Department, should create or update policies and procedures

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to ensure the expeditious approval and dissemination of public information during and after an emergency. The policies could include creating procedures for establishing a City-specific joint information center. (Priority 2)

Management Response: Agree with the recommendation. OES, in coordination with the Mayor's Office and the Communications Department, will develop or update policies and procedures to ensure the timely approval and dissemination of public information during and after an emergency. This will include establishing a City-specific Joint Information Center (JIC) to coordinate public messaging efforts.

Target Implementation Date: July 2026

RECOMMENDATION 3.1: The City should develop and document policies and procedures for mobilizing an incident management team (IMT) in emergency planning and response, including emergencies other than fires. These policies and procedures should include, at minimum:

a. A requirement that the IMT have a written delegation of authority and the minimum elements required to be in the written delegation of authority;
b. A roster of staff for the functions of the IMT;
c. A process to periodically review the roster for the IMT to ensure it is up to date; and
d. Training requirements for IMT roster members related to their functions on the IMT. (Priority 3)

Management Response: Agree with the recommendation. The City intends to develop an all-hazards Incident Management Team (IMT) composed of subject matter experts from across City departments. While the current IMT is fire-centric and managed by San Diego Fire-Rescue Department (SDFD), expanding to a multidisciplinary team will necessitate identifying appropriate staff, defining training requirements, and assessing the associated costs.

OES will coordinate with SDFD to develop IMT mobilization policies and procedures consistent with FEMA guidelines, including delegation of authority, staffing rosters, roster maintenance, and role-specific training.

Target Implementation Date: July 2026

RECOMMENDATION 3.2: The City should develop and deploy training on the Incident Management Team structure, its purpose, and how it fits into the overall emergency response structure for the Emergency Operations Center roster and Incident Management Team roster members, City leadership (such as department directors and deputy or assistant directors), and City Council Offices. The training requirement and frequency should be included in the training structure established in Recommendation 4.6. (Priority 2)

Management Response: Agree with the recommendation. IMT familiarization, concepts, and application have been incorporated into ongoing EOC training and bi-annual tabletop exercise disaster scenarios. OES will coordinate targeted training for City leadership, Council Offices, and IMT roster members, with training requirements and frequency aligned with the structure outlined in Recommendation 4.6 and further detailed in Recommendation 1.3.

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Target Implementation Date: July 2026

RECOMMENDATION 4.1: The Office of Emergency Services should update the City's Emergency Operations Plan to include the Office's current name and identify the current primary and alternate Emergency Operations Center locations. (Priority 3)

Management Response: Agree with the recommendation. OES, in coordination with regional partners, has recently completed an update to the regional EOP template, which is now being used to revise the City of San Diego's EOP. The updated plan will be presented to City Council for approval upon completion.

OES is currently evaluating options for an alternate EOC location, with selection focused on operational suitability, logistical considerations, and current budgetary constraints.

Target Implementation Date: July 2026

RECOMMENDATION 4.2: The Office of Emergency Services should develop a donations and volunteer management plan, potentially as an annex or annexes to the City's Emergency Operations Plan. (Priority 3)

Management Response: Agree with the recommendation. OES will develop an annex to the EOP based on the OA's donations and volunteer management plan and direction from City policymakers.

Target Implementation Date: July 2026

RECOMMENDATION 4.3: The Office of Emergency Services should enter into negotiations with the County of San Diego to develop an agreement so the City can use Crisis Track in City emergencies and have expeditious access to Crisis Track data in the format necessary. (Priority 2)

Management Response: Agree with the recommendation. Although Crisis Track data was accessed and utilized during the January 2022 storms, no formal agreement was in place. OES will establish a written agreement with the County to ensure continued timely access to Crisis Track during a disaster.

Target Implementation Date: December 2025

RECOMMENDATION 4.4: The Office of Emergency Services should work with the Performance and Analytics Department to create a plan for gathering, accessing, and using data from Get It Done reports or from a similar program, that could provide information to increase situational awareness during an emergency. (Priority 2)

Management Response: Agree with the recommendation. OES accessed and used Get It Done data during the January 2022 storms, but no formal procedure was in place. OES will continue coordinating with the Performance and Analytics Department to develop a written procedure for accessing and using this data during emergencies.

Target Implementation Date: July 2026

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RECOMMENDATION 4.5: The Office of Emergency Services should develop policies and procedures to review and update the Emergency Operations Center roster quarterly and track training information on each roster member to ensure that staff on the roster are appropriately trained. (Priority 2)

Management Response: Agree with the recommendation. OES will codify its current best practice through a written policy outlining procedures for quarterly updates to the EOC roster and the tracking of completed training for each roster member.

Target Implementation Date: September 2025

RECOMMENDATION 4.6: The Office of Emergency Services should continue its work to develop a training program for City leadership and staff on the City's emergency response protocol.

a. The training program should be tiered depending on the staff's role and list required training topics to be covered for each tier. For example, training for all City employees should cover high-level information about the City's role in a disaster, the Emergency Operation Center's role, an Incident Management Team's role, the incident command structure, and what elements of their job may change if they are activated as a Disaster Service Worker. Members on the Emergency Operations Center roster and Incident Management Team roster would have the general City staff training and more detailed trainings on their specific roles and responsibilities. The Mayor's Office's training and City Council Offices' training would have the general City staff training and information covered in Recommendation 1.3 and Recommendation 1.4, respectively.
b. The training program should detail when employees should receive the trainings. At minimum, all City staff should receive basic refresher trainings on their potential assignment as a disaster service worker annually.
c. The training program should have a mechanism to track which employees have and have not completed the required trainings, like other mandatory City trainings. (Priority 2)

Management Response: Agree with the recommendation. OES is assisting the Human Resources Department to provide tracking and training requirements for all disaster service workers.

FEMA based training for the Mayor's Office, City Council, and individuals assigned to the EOC has been identified and will be coordinated through OES.

Target Implementation Date: July 2026

RECOMMENDATION 4.7: The Office of Emergency Services should create policies and procedures to hold emergency response trainings at least twice per year, in line with its current goals. The policy should ensure the types of trainings vary from tabletop exercises to full simulations and that the disaster types vary as needed as well. The policy should ensure the Mayor's Office and City Council Offices are invited to attend. (Priority 2)

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Management Response: Agree with the recommendation. OES will codify its practice of holding at least two citywide emergency response trainings per year through a formal policy. In FY25, OES conducted tabletop exercises focused on flood response and wildland urban interface fire scenarios.

Target Implementation Date: July 2026

RECOMMENDATION 4.8: The Office of Emergency Services (OES), in collaboration with relevant departments and agencies, should establish policies and procedures to track and report on the implementation status of recommendations and corrective actions in the After-Action Reports OES completes. The policies and procedures should include:

   a. When OES will draft After-Action Reports (such as after the Emergency Operations Center activates at a Level 1 or 2 and after simulation trainings);
   b. Who the reports will be provided to;
   c. A process for identifying corrective actions and assigning corrective actions to the responsible City department; and
   d. A process for tracking improvement progress to ensure that corrective actions are implemented. (Priority 2)

Management Response: Agree with the recommendation. OES will codify after-action report requirements in the EOP using FEMA guidelines. The policy will define when and what type of after-action reports are required, how corrective actions are assigned and tracked, and who will receive the reports.

Target Implementation Date: July 2026

Thank you for the opportunity to provide responses to these recommendations. Management appreciates your team's professionalism throughout this review. We appreciate the acknowledgement of the 180,000 plus hours of work performed by City staff, across departments, in response to the storm.

Thank you,

Chris Heiser
Executive Director, Office of Emergency Services

Attachment: 1. Ch05Art01Division01_Disaster Council

cc: Honorable City Attorney Heather Ferbert
         Paola Avila, Chief of Staff, Office of the Mayor
         Charles Modica, Independent Budget Analyst
         Matthew Vespi, Chief Financial Officer, Office of the Mayor
         Robert Logan, Chief, Fire-Rescue Department
         Scott Wahl, Chief, Police Department
         Alia Khouri, Deputy Chief Operating Officer, Office of the Mayor

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Kris McFadden, Deputy Chief Operating Officer, Office of the Mayor
Casey Smith, Deputy Chief Operating Officer, Office of Mayor
Christiana Gauger, Chief Compliance Officer, Compliance Department
Matt Yagyagan, Director of Policy, Office of the Mayor
Emily Piatanesi, Policy Advisor, Office of the Mayor
Trisha Tacke, Program Manager, Compliance Department

Chapter 5
Public Safety, Morals and Welfare

Article 1: Public Emergency Procedures

Division 1: Public Emergency Procedures
(Editors note: Division 1 created 11–3–1988 for clarity.)

§51.0101   Purposes

The purposes of this Article are to provide for the preparation and carrying out of plans for the protection of persons and property within the City of San Diego in the event of an emergency; the direction of an emergency organization; and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations, and affected private persons. This Article is intended to comply with the California Emergency Services Act, California Government Code section 8550 *et. seq*.

(Added 2–5–1974 by O–11230 N.S.)
(Amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)

§51.0102   Definitions

As used in this Article, the terms *state of emergency*, *local emergency*, and *state of war emergency* have the same meanings as in California Government Code section 8558, as may be amended.
(Amended 4–21–1976 by O–11833 N.S.)
(Retitled from "Definition" to "Definitions" and amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)

§51.0103   Disaster Council Membership

The City of San Diego Disaster Council is created and shall consist of the following:

(a)   The Mayor, who shall be Chair and also the Director of Emergency Services;

(b)   The Chief Operating Officer, who shall be Vice Chair;

(c)   The Executive Director of the Office of Homeland Security;

(d)   Such Chiefs of Emergency Services as are provided for in a current emergency plan of this City, adopted pursuant to this article; and

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(e)   Such representatives of civic, business, labor, veterans, professional, or other organizations having an official emergency responsibility, as may be appointed by the Chair with the advice and confirmation of the City Council.

(Added 2–5–1974 by O–11230 N.S.)
(Amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)

§51.0104   **Disaster Council — Powers and Duties**

The City of San Diego Disaster Council shall develop and recommend for adoption by the City Council, emergency and mutual aid plans and agreements and such ordinances, resolutions, rules, and regulations as are necessary to implement such plans and agreements. The Disaster Council shall meet upon call of the Chair, or, in the Chair's absence from the City or inability to call such meeting, upon call of the Vice Chair, at least three times each calendar year.
(Added 2–5–1974 by O–11230 N.S.)
(Amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)

§51.0105   **Powers and Duties of the Chair and Assistant Chair of the Disaster Council**

(a)   The Chair is empowered to:

(1)   Request the City Council to proclaim the existence or threatened existence of a *local emergency* if the City Council is in session, or to issue such proclamation if the City Council is not in session. Whenever a *local emergency* is proclaimed by the Chair, the City Council shall take action to ratify the proclamation within seven days of the proclamation or the proclamation shall have no further force or effect.

(2)   Request the Governor to proclaim a *state of emergency* when, in the opinion of the Chair, the locally available resources are inadequate to cope with the *local emergency*.

(3)   Guide the effort of the emergency organization of the City for the accomplishment of the purposes of this Article.

(4)   Direct cooperation and coordination of services and staff of the emergency organization of the City and resolve questions of authority and responsibility within the emergency organization.

(5)   Represent the City in all dealings with public or private agencies on matters pertaining to a *local emergency*.

(6) In the event of the proclamation of a *local emergency*, the proclamation of a *state of emergency* by the Governor of California or the Director of the California Governor's Office of Emergency Services, or the existence of a *state of war emergency*, the Chair is empowered:

    (A) To make and issue rules and regulations on matters reasonably related to the protection of life and property; provided, however, such rules and regulations must be confirmed at the earliest practicable time by the City Council;

    (B) To obtain vital supplies, equipment, and such other properties found lacking and needed for the protection of life and property and to bind the City for the fair value thereof and, if required immediately, to commandeer the same for public use within the confines of the San Diego Charter and state law;

    (C) To require emergency services of any City officer or employee and to command the aid of as many citizens of the City as necessary in the execution of these duties; such persons shall be entitled to all privileges, benefits, and immunities as are provided by state law for registered disaster service workers;

    (D) To requisition necessary personnel or material of any City department or agency; and

    (E) To execute all of the special powers conferred upon the Chair by this ordinance or by resolution or emergency plan adopted by the City Council, all powers conferred upon the Chair by any statute, by any agreement approved by the City Council, and by any other lawful authority.

(b) In the event the Chair is unavailable or is otherwise unable to perform the assigned duties during a *local emergency*, *state of emergency*, or *state of war emergency*, individuals listed in this subsection who hold permanent appointments to the following positions automatically serve as Chair of the Disaster Council, in descending order:

1) the Chief Operating Officer,

2) the Assistant Chief Operating Officer,

3) the Deputy Chief Operating Officer-Infrastructure/Public Works,

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4)   the Police Chief,

5)   the Fire Chief, or

6)   the Executive Director of the Office of Homeland Security.

The succession of an individual to the position of Acting Chair of the Disaster Council is subject to City Council approval at the next scheduled Council Meeting. The succession pertains only to the duties and responsibilities of the Chair of the Disaster Council as defined in section 51.0105(b) and does not address vacancies to the Office of the Mayor.

(c)   The Vice Chair shall, under the supervision of the Chair and with the assistance of the Executive Director of the Office of Homeland Security, the Police Chief, and the Fire Chief, manage the emergency programs of the City and shall have such other powers and duties as may be assigned by the Chair.

("Powers and Duties of the Director and Assistant Director of Emergency Services" added 2–5–1974 by O–11230 N.S.)
("Powers and Duties of the Director and Assistant Director of Emergency Services" renumbered from former Section 51.0106, retitled to "Powers and Duties of the Chair and Assistant Chair of the Disaster Council," and amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016. Former Section 51.0105, "Director and Assistant Director of Emergency Services" repealed.)

§51.0106   **Emergency Organization**

All officers and employees of the City, together with those volunteer forces enrolled to aid them during a *local emergency*, *state of emergency*, or *state of war emergency*, and all groups, organizations, and persons who may by agreement or operation of law, including persons impressed into service under the provisions of section 51.0105(a)(6)(C) charged with duties incident to the protection of life and property in this City during such emergency, shall constitute the emergency organization of the City of San Diego.

(Added 2–5–1974 by O–11230 N.S.)
(Renumbered from former Section 51.0107and amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)

§51.0107   Emergency Operations Plan

The City Office of Homeland Security shall be responsible for the development and updating of the City of San Diego Emergency Operations Plan, which shall provide for the effective mobilization of all the resources of the City, both public and private, to meet any *local emergency*, *state of emergency*, or *state of war emergency*, and shall provide for the organization, powers and duties, services, and staff of the emergency organization.

(Added 2–5–1974 by O–11230 N.S.)
(Renumbered from former Section 51.0108, retitled from "Emergency Plan" to "Emergency Operations Plan," and amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)

§51.0108   Punishment of Violations

It shall be a misdemeanor, punishable by a fine of not to exceed one thousand dollars ($1,000), or by imprisonment for not to exceed six months, or both, for any person, during a *local emergency*, *state of emergency*, or *state of war emergency*, to:

(a)   Willfully obstruct, hinder, or delay any peace officer or any member of the emergency organization in the enforcement of any lawful rule or regulation issued pursuant to Chapter 5, Article 1, Division 1, or in the performance of any duty imposed upon the peace officer or any member of the emergency organization of the City pursuant to Chapter 5, Article 1, Division 1.

(b)   Do any act forbidden by any lawful rule or regulation issued pursuant to Chapter 5, Article 1, Division 1, if such act is of such a nature as to give or be likely to give assistance to the enemy or to imperil the lives or property of inhabitants of the City, or to prevent, hinder, or delay the defense or protection of the City.

(c)   Wear, carry, or display, without authority, any means of identification specified by the emergency organization of the City.

(Added 2–5–1974 by O–11230 N.S.)
(Renumbered from former Section 51.0110, and amended 5-23-2016 by O-20645 N.S.; effective 6-22-2016.)