



## Summary Fact Sheet

May 1, 2025

### AUDIT OF THE DEPARTMENT OF CORRECTIONS AND REHABILITATION'S NATURAL DISASTER AND EMERGENCY PREPAREDNESS AND MITIGATION EFFORTS (AUDIT REPORT Nº 24-01, MAY 2025)

#### Introduction

California is the most disaster-prone State in the nation, vulnerable to wildfires, floods, and earthquakes across its diverse geography. In our audit, we reviewed the department's specific policies, procedures, and mandated staff training implemented to prepare for and respond to wildfires, floods, and earthquakes, its coordination with Federal, State, and local entities. We also assessed the departments' ability to evacuate prisons threatened by wildfires, floods, and earthquakes.

In addition, we evaluated the 2024 emergency operations plans from 30 prisons to determine their compliance with law, policy, and industry standards. We reviewed three prisons in depth: Valley State Prison, California Rehabilitation Center, and San Quentin Rehabilitation Center. We reviewed the prisons methods to assess their risks of natural disasters and their documented mitigation plans. Finally, we reviewed the adequacy and management of on-site supplies and emergency essentials.

#### Results

##### **California's Overcrowded Prisons Are Vulnerable to Wildfires, Floods, and Earthquakes**

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

Although the department and individual prisons have plans assessing the risks from and response to wildfires, floods, and earthquakes, those plans are general in nature and inadequate if large scale external evacuations are necessary. California regulations mandate that each prison's site-specific emergency plan must include procedures for emergency evacuation, including evacuation types, exit routes,

and personnel assignments to ensure the safety of staff during emergencies. In addition, regulations require prisons to have plans to respond to natural disasters, and departmental policy requires prisons to have external evacuation procedures.

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

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

In 2023, California experienced record breaking high levels of rain and snow that threatened to inundate the Tulare Basin. Because California State Prison, Corcoran (Corcoran), and the Substance Abuse Treatment Facility are located near the Tulare Basin, they were determined to be at high risk of flooding if the levees protecting the area were breached. However, neither prison had detailed site-specific emergency plans that included external evacuations. The prisons developed an evacuation plan to evacuate approximately 8000 incarcerated people in 11 to 14 days. However, we found that 72 hours is a reasonable time frame to respond to emergencies demanding quick action. We arrived at this time frame after careful consideration of several factors, including the unique environment of prisons, the logistics involved in evacuating the incarcerated population—particularly high-security risk individuals—and the operational requirements for a prison's external



evacuation. In addition, we considered how rapidly conditions can escalate during emergencies, especially wildfires and earthquakes. The department's inability to evacuate prisons within 72 hours significantly increases the threat to the safety of incarcerated people, and overall prison stability in the event of a natural disaster.

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

While all departmental fleet vehicles throughout the State could be deployed to assist with an evacuation, the number of vehicles at each of the three departmental transportation hubs, and their proximity to prisons in the region, varies. Consequently, if a natural disaster necessitated evacuating San Quentin Rehabilitation Center, the closest departmental fleet vehicles not permanently located at the prison or at a nearby prison are in Galt, approximately 90 miles away. The distances between hubs and prisons potentially needing external evacuations can be great, further limiting the department's ability to quickly evacuate.

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

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

The department's ability to timely and effectively respond to large-scale emergencies is further complicated by prison overcrowding. As of December 31, 2024, California prisons were operating at 122 percent above designed capacity, housing an additional 16,263 individuals. Overcrowding not

only complicates the department's ability to manage emergencies, but also greatly exacerbates its inability to evacuate incarcerated populations if necessary. In addition, the proximity of neighboring prisons increases the likelihood that multiple facilities would be affected by the same natural disaster, requiring a coordinated evacuation of their populations and staff.

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

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

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

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

We found that Valley State Prison, California Rehabilitation Center, and San Quentin Rehabilitation each conducted their risk-assessments differently and may not have assessed the same factors when assessing their risks. Because prisons use different tools when assessing and rating their risk of wildfires, floods, and earthquakes, the department cannot ensure prisons are thoroughly and accurately examining and assessing their risks. Moreover, without a robust standardized risk assessment process, the department cannot ensure suitable control measures are put in place to minimize the risks—especially high risks—to acceptable levels.

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

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

***The Emergency Planning Unit Does Not Substantively Review Prisons' Site-Specific Emergency Operations Plans as Required by California Regulations and Departmental Policy******The Emergency Planning Unit's Approval Process Is Flawed***

While the emergency planning unit performs some review activities, such as verifying that each prison submits a site-specific plan and ensuring that certain documents are included with it, we found that the emergency planning unit lacks formal guidelines or specific criteria to assess the content of the plans.

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

In addition to site-specific emergency plans, departmental policy requires prisons to develop site-specific supplements that address site-specific hazards not covered by the department's emergency plan. Departmental policy further requires prisons to review and revise the policy supplements annually or as needed based on specific incidents including disasters or disturbances. Although the emergency planning unit requires prisons to submit the site-specific supplements, it does not review them to assess their adequacy.

California regulations mandate that each prison's emergency plan must include procedures for emergency evacuation and specify evacuation types and exit route assignments to ensure the safety of staff during emergencies. In addition, departmental policy requires prisons to include response procedures in site-specific supplements that outline external evacuations. We found that the evacuation plans outlined in prisons' site-specific emergency plans and supplements, particularly Corcoran and the Substance Abuse Treatment Facility, showed significant gaps in detail and were missing critical information.

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

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

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



## Recommendations

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

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

wildfires to have fire retardant available to help reduce the probability of housing units catching on fire.

### ***Although Almost All Prisons Assess Their Risk of Natural Disasters, They Do Not Do So Consistently***

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

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

- The emergency planning unit should establish clear criteria, including external evacuation procedures, and implement a formal approval process for approving site-specific emergency plans and supplements, to ensure compliance with California regulations and best practices.

- The department should require the emergency planning unit to formally review all site-specific emergency plans using established criteria and approve only the site-specific plans and supplements that meet the established criteria.
- The department should require the emergency planning unit to visit prisons on a rotating basis to review the prison's risk assessments, to ensure the assessments are thorough and accurate, and to ensure that mitigation measures are in place.

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

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