

HUMBOLDT COUNTY EMERGENCY PREPAREDNESS:

READY OR NOT?

Released June 16, 2023

SUMMARY

Earthquakes, tsunamis, fires, flooding or unnatural hazards such as chemical or radioactive occurrences – What if a catastrophic, cascading event involving two or more of these hazards were to occur in our community?

Humboldt County is vulnerable to many potentially catastrophic environmental events. We find that Humboldt County is not adequately prepared to deal with a major natural and unnatural disaster.

The 2022-2023 Humboldt County Civil Grand Jury (HCCGJ) received a citizen's complaint, asking that we investigate the Independent Spent Fuel Storage Installation (ISFSI) operated by the Pacific Gas and Electric Company (PG&E). The ISFSI facility is an underground storage area for highly radioactive material left over by the former Humboldt Bay Nuclear Power Plant (HBNPP). The ISFSI is located northeast of the unincorporated community of King Salmon.

The Civil Grand Jury is not authorized to investigate non-governmental agencies such as PG&E. However, we did investigate how prepared Humboldt County is to deal with multi-disaster events.

Upon reviewing county emergency preparedness measures, we found no evidence that Humboldt County's master Emergency Operations Plan (EOP) has been completely updated since its publication in 2015. Presently, the Humboldt County Sheriff's Department, Office of Emergency Services (OES) is charged with emergency preparedness planning. The OES intends to update and rewrite the EOP over the next two years.

Both the Disaster Council and OES were created by the same county ordinance in 2011. The OES is placed under the control of the elected Humboldt County Sheriff. The Sheriff is designated as Humboldt County's overall Director of Emergency Services and is a mandated member of the Disaster Council. The Disaster Council's function is to advise the Board of Supervisors (BOS) and oversee the EOP.

The Humboldt County Civil Grand Jury found no evidence that the Disaster Council, an advisory and oversight body, has met since 2015. Moreover, we could find no one who could provide us with a current roster of its members.

The Humboldt County Civil Grand Jury concludes that while individual companies and various first-responder agencies and departments seem to adequately respond to incidental emergencies, the Board of Supervisors and the Sheriff have been lax with respect to their responsibility to maintain a comprehensive plan for responding to large-scale disastrous events.

GLOSSARY OF TERMS

BOS	Board of Supervisors
CA OES	California Governor’s Office of Emergency Services
CERT	Community Emergency Response Team
EAP	Emergency Action Plan (aka “Contingency or Business Plan”)
EH	Humboldt County Department of Health and Human Services Division of Environmental Health
EOP	Emergency Operations Plan
EPCRA	Emergency Planning and Community Right-to-Know Act of 1986, Title III, PL 99-499
FEMA	Federal Emergency Management Administration
Haz Mat	Hazardous Materials
HBFD	Humboldt Bay Fire Department
HBNPP	Humboldt Bay Nuclear Power Plant
HCCGJ	Humboldt County Civil Grand Jury
HC OES	Humboldt County Office of Emergency Services or more commonly OES
HCSO	Humboldt County Sheriff’s Office
HOA	Humboldt Operations Area
ISFSI	Independent Spent Fuel Storage Installation
NRC	United States Nuclear Regulatory Commission
PG&E	Pacific Gas and Electric Company
Postulate	Suggest or assume the existence, fact, or truth of (something) as a basis for reasoning, discussion, or belief: a thing suggested or assumed as true as the basis for reasoning, discussion, or belief
VOAD	Voluntary Organizations Active in Disaster, locally known as Community Organizations Active in Disaster (COAD)

BACKGROUND

Humboldt County's many small communities occupy a landscape of extremes:

- Our weather ranges from drought -- sometimes causing catastrophic wildfire and dangerous air pollution – to torrential precipitation, flooding, mudslides and the destruction of roads, bridges and other civil infrastructure – all in the course of a few months.
- Residents live amid steep, erosive topography, where innumerable rivers and creeks drain thick forests perched atop unconsolidated sedimentary geology.¹ Coastal lands are assaulted by hurricane-force windstorms and plagued by electrical power outages, while climate change contributes to sea-level rise in areas already inundated by extremely high tides every year.²
- The whole of the county is rocked regularly by significant magnitude earthquakes due to unique, increasingly understood tectonic and seismic conditions known to trigger substantial, destructive tsunamis.

When such conditions coincide – cascading events – the potential for unmitigated catastrophe grows. In a short succession of mere hours, the cascading effects of a massive temblor, the 2011 Tōhoku Earthquake and Tsunami (also called the Great Eastern Japan Earthquake), contributed to the Fukushima Nuclear Power Plant meltdown and widespread radiological contamination.

Due to the possibility of extreme conditions in Humboldt County, emergency preparedness, planning and coordination must be recognized as one of the most essential services of our local government. We are concerned that Humboldt County may be falling behind in its efforts and obligations to plan for reasonably postulated emergency circumstances – worst case scenarios occasioned by the unique character of our lands and communities.

Considering rapidly developing science and information on climate change, sea level rise, plate tectonics, satellite and remote instrument data-mapping and analysis, and staffing, planning and focus limitations, Humboldt County finds itself inadequately prepared for a cascading, large scale event.

¹ Swirad, Zuzanna M. and Adam P. Young, "Spatial and temporal trend in California coastal cliff retreat", *Geomorphology*, Scripps Institution of Oceanography, 2022.

² By 2100, the model estimates that 25 to 70% of California's beaches may become completely eroded due to sea-level rise scenarios of 0.5 to 3.0 m, respectively. Vitousek, Sean et. al., "A model integrating satellite-derived shoreline observations for predicting fine-scale shoreline response to waves and sea-level rise across large coastal regions", *United States Geological Survey Pacific Coastal & Marine Science Center et. al.*, March 9, 2023.

METHODOLOGY

- Conducted interviews with representatives of Humboldt County Board of Supervisors, Humboldt County Sheriff's Department Office of Emergency Services, Humboldt County Department of Health and Human Services Division of Environmental Health, Humboldt Bay Fire Department, Cal Poly Humboldt and Pacific Gas and Electric Company.
- Studied state and federal guidelines and law for emergency planning
- Reviewed documents regarding ISFSI construction and operation
- Reviewed communication between Pacific Gas and Electric Company and the United States Nuclear Regulatory Commission
- Reviewed Humboldt County Code regarding Humboldt County Disaster Council
- Extensively reviewed scientific documents regarding environmental hazards
- Visited Buhne Point and surroundings
- Reviewed California Grand Jury Association's website for other county reports on emergency preparedness
- Attended Humboldt County Operational Area Meeting - October 21, 2022

DISCUSSION

The 2022-23 Humboldt County Civil grand Jury questions how well Humboldt County is prepared for or could mitigate a low-probability high-consequence (LPHC) disastrous event – unusual and unexpected but not beyond the realm of imagination or possibility, and severe or catastrophic in terms of injury to people, damage to infrastructure, and damage to the environment. The Humboldt County Civil Grand Jury cannot investigate private companies. However, we can investigate the County's process to prepare for simultaneous multi-disasters or emergencies.

HUMBOLDT COUNTY EMERGENCY OPERATIONS PLAN (EOP)

Humboldt County Emergency Operations Plan (EOP) is the principal guide for preparation and response to local emergencies or disasters – a 390-page document that was formally approved by the Humboldt County Board of Supervisors and published in March 2015.³

³ <https://humboldt.gov/DocumentCenter/View/51861/Humboldt-County-Emergency-Operations-Plan-2015>

The Humboldt County Civil Grand Jury examined this document and discovered several deficiencies:

- Although the EOP calls for periodic review and update, it has not been revised since 2015.
 - [EOP § 1.11.1 (2015) p. 91: “This Humboldt County Emergency Operations Plan (EOP) will be reviewed and revised as necessary by the County Office of Emergency Services (OES) annually. The plan may be modified as a result of post-incident analyses and/or post-exercise critiques. It may be modified if responsibilities, procedures, laws, rules, or regulations pertaining to emergency management and operations change. Every four years, the entire EOP will be reviewed, updated, republished, and redistributed by the OES.”]
- We found no evidence that the 2015 EOP has yet to be reviewed and commented upon by the California State Office of Emergency Services (CA EOS) under the new state guidelines. Recent mandated updates are outlined in the Appendix.
- We found no evidence that the 2015 EOP provides public evacuation information in a manner that can be easily accessed or understood.
- We found no evidence that the 2015 EOP provides information regarding routes, destinations, or support logistics. *Zonehaven* is a designated emergency awareness program created by the state and adopted by the county.⁴ A map of neighborhood zones has subsequently been published as required by state law. One may look up a state assigned *Zonehaven* code, but it is meaningless without internet access, which is frequently unavailable during an emergency.
- The list of emergency contacts that should be associated with the EOP (person, office, organization responsibility, communication information) is out-of-date and has many significant errors and omissions. For example, PG&E is not in the EOP nor is it in the current Humboldt Operations Area contact list provided by OES to the 2022-23 Humboldt County Civil Grand Jury.
- There is no information in the EOP for civilian volunteer emergency participation regarding the chain-of-command, roles, responsibilities, direction, or response. Moreover, we found that when volunteer emergency preparedness training is available, e.g., Community Emergency Response Team (CERT), it often occurred after a disaster instead of prior to a disaster.

⁴ <https://aware.zonehaven.com>

- The only reference in the EOP to the ISFSI is to in-effect call PG&E.
 - [EOP § 2.8.2.8 (2015) p.161: “For any emergency involving the Pacific Gas and Electric Humboldt Bay Power Plant, refer to the PG&E Humboldt Bay Power Plant Environmental Protection Plan located in the Humboldt County Emergency Operations Center (EOC). The power plant contains a decommissioned nuclear unit with onsite storage of radioactive materials. Special emergency response procedures under the direction of PG&E expert personnel must be followed when responding to any incident at the site.”]

These omissions led us to review the Humboldt County Office of Emergency Services (HC OES).

HUMBOLDT COUNTY OFFICE OF EMERGENCY SERVICES (HC OES)

The Humboldt County Office of Emergency Services (HC OES or OES) was created by a 2011 ordinance passed by the Humboldt County Board of Supervisors entitled “Emergency Organization and Functions of Humboldt County Disaster Council.” The Humboldt County Sheriff is appointed as the county’s Director of Emergency Services – the principal county official in charge of coordinating a response to an emergency. The Sheriff appoints an Undersheriff as Deputy Director of Emergency Services, a Lieutenant as Assistant Director of Emergency Services, and a civilian Emergency Services Coordinator (Manager). The ordinance provides that the Disaster Council and Director of Emergency Services (the Sheriff), through the Emergency Services Coordinator (Manager), shall develop, revise, and implement the county EOP.

- [Humboldt County Code § 2210-7(e), (2011): “The Emergency Services Coordinator shall, under the supervision of the Director and with the assistance of emergency services chiefs, develop emergency plans and manage the emergency programs of this County ...”]

We note the following issues:

- The Humboldt County Office of Emergency Services intends to rewrite, revise, and update the Humboldt County EOP. The timeline, process and procedure for doing this is not defined. As of June 2023, other than an expression of good intent, there is no plan to update the EOP.
- The writing, revision, and distribution of the Humboldt County EOP is a significant undertaking. The HC OES does not currently have sufficient expert staff to complete this within a reasonable time frame.
- With respect to the Humboldt Bay ISFSI, PG&E and NRC maintain that no credibly possible catastrophic event or events could occur that would compromise the installation, release radioactive material, and jeopardize the population and environment. County government officials take these assurances at face value:

- “There are no postulated accidents at the ISFSI that could result in the release of radioactive materials to the environment in quantities that require the implementation of protective actions for the general public.”

We then examined the relationship between the HC OES and the county Disaster Council.

DISASTER COUNCIL

The California Emergency Services Act provides that a county by ordinance may create a Disaster Council. The Humboldt County Board of Supervisors (BOS) created a county Disaster Council “Emergency Organization and Functions of Humboldt County Disaster Council.” in 2011 as an advisory board. The Disaster Council, along with the Sheriff as Director of Emergency Services and the Emergency Services Coordinator (Manager), is responsible for drafting, maintaining, distributing, and implementing the Humboldt County EOP. The EOP takes effect upon adoption by resolution of the BOS.

- [CA GOV § 8610(a): “Counties, cities and counties, and cities may create disaster councils by ordinance. A disaster council shall develop plans for meeting any condition constituting a local emergency or state of emergency, including, but not limited to, earthquakes, natural or manmade disasters specific to that jurisdiction, or state of war emergency; those plans shall provide for the effective mobilization of all of the resources within the political subdivision, both public and private. The disaster council shall supply a copy of any plans developed pursuant to this section to the Office of Emergency Services. The governing body of a county, city and county, or city may, in the ordinance or by resolution adopted pursuant to the ordinance, provide for the organization, powers and duties, divisions, services, and staff of the emergency organization.”]
- [Humboldt County Code § 2210-11, (2011): “The Humboldt County Disaster Council shall be responsible for the development of the Humboldt County Emergency Operations Plan, which plan shall provide for the effective mobilization of all of the resources of this County, both public and private, to meet any condition constituting a local emergency, or state of war emergency; and shall provide for the organization, powers and duties, services, and staff of the emergency organization. Such plans shall take effect upon adoption by resolution of the Board of Supervisors.”]
- [Humboldt County Code § 2210-7(e), (2011): “The Emergency Services Coordinator shall, under the supervision of the Director and with the assistance of emergency services chiefs, develop emergency plans and manage the emergency programs of this County ...”]

The membership of the Disaster Council is specified in the ordinance as:

1. The Chair of the Board of Supervisors;
2. One non-Chair member of the Board of Supervisors, with the remaining three non-Chair members serving as alternates;
3. The Director of Emergency Services [Humboldt County Sheriff];
4. The Deputy Director of Emergency Services [Humboldt County Undersheriff];
5. The Assistant Director of Emergency Services [Humboldt County Sheriff Lieutenant];
6. The Emergency Services Coordinator [appointed by Humboldt County Sheriff];
7. Such Chiefs of Emergency Services as are provided for in the current emergency plan [unspecified];
8. A representative of the Voluntary Organizations Active in Disaster, (VOAD) [unspecified];
9. A representative of the Humboldt County Fire Chiefs Association [unspecified];
10. A representative of the North Coast Emergency Medical Services (EMS) [unspecified];
11. A representative of AT&T [unspecified];
12. A representative of Pacific Gas and Electric Company (PG&E) [unspecified].

The HC Disaster Council is charged with meeting at least twice in each calendar year. However, this ordinance does not define the process for the selection of the Chairman or Vice-Chairman, who is charged with calling the twice-yearly mandated meetings.

- [Humboldt County Code § 2210-5, (2011): “It shall be the duty of the Humboldt County Disaster Council, and it is hereby empowered, to develop and recommend for adoption by the Board of Supervisors, 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 Chairman or, in his/her absence from the County or inability to respond to call such meeting, upon call of the Vice Chairman and shall meet at least two times in each calendar year.”]

The Humboldt County Civil Grand Jury notes that:

- The HC Disaster Council is not currently active; the HC Disaster Council has not met since 2015; the HC Disaster Council does not have a process to identify how the Chairman or Vice chairman are selected in order to call the twice-yearly mandated meetings; most of the designated membership positions of the HC Disaster Council are vacant; and culturally diverse communities are not specified in the 2011 Humboldt County ordinance regarding the Disaster Council membership.⁵

⁵ Additionally, counties “shall provide a forum for community engagement in geographically diverse locations to engage with culturally diverse communities within its jurisdiction.” (Gov. Code, § 8593.3.5, subd. (b).) <https://www.caloes.ca.gov/wp-content/uploads/Preparedness/Documents/Fact-Sheet-Updates-to-CA-EOP-Legislation-2016-2022-2022-09-29.pdf>

HUMBOLDT COUNTY BOARD OF SUPERVISORS AND HUMBOLDT COUNTY SHERIFF

Planning for emergency response to a disaster is ultimately the concurrent responsibility of the Board of Supervisors and the Sheriff. (See Figure 1 below.) Although first-responder agencies, departments, and individual businesses seem to adequately respond to incidental emergencies, the Humboldt County Board of Supervisors and Sheriff have been lax with respect to their responsibility to maintain a comprehensive plan for responding to large-scale disastrous events.

Although the revenues for county functions are projected to be less this year, it is the expectation of this 2022-23 Humboldt County Civil Grand Jury that the Board of Supervisors and the Sheriff will direct their staff to seek out other revenue sources. Having funds for public safety must be a priority.

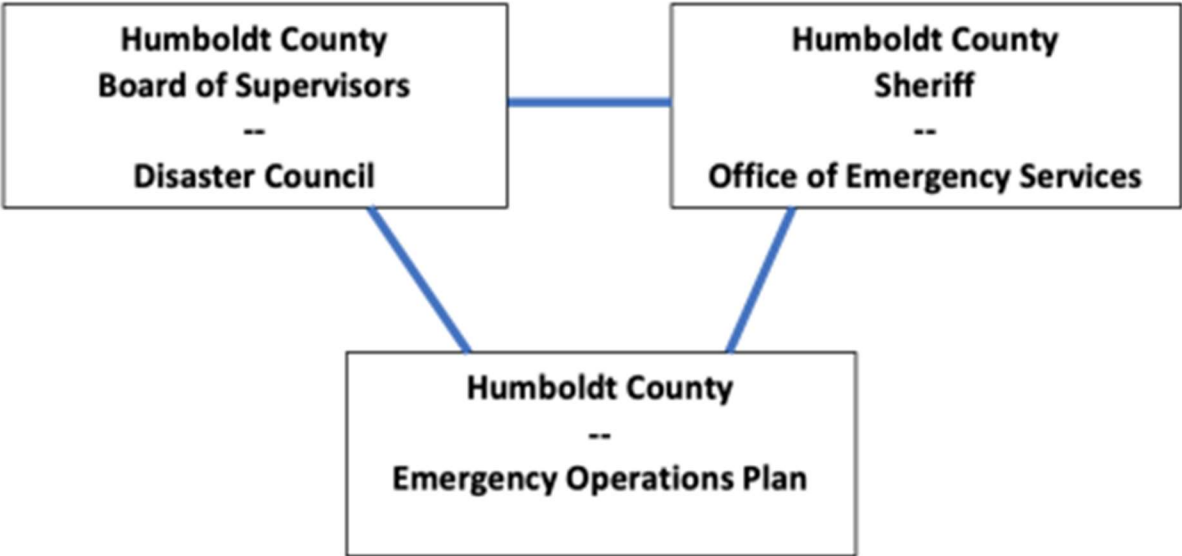


FIGURE 1: Pictured as a triangular relationship -- the Humboldt County Board of Supervisors' Disaster Council and the Humboldt County Sheriff's Office of Emergency Services are both responsible for developing the county's Emergency Operations Plan.

FINDINGS

The Humboldt County Civil Grand Jury finds that:

- **F1:** No evidence could be found that the County's Disaster Council has met since the adoption of the Humboldt County Emergency Operations Plan in 2015. As a consequence of not being active, the Disaster Council provides no direction with regard to emergency planning, communication, coordination, or response within the County.
- **F2:** The Humboldt County Disaster Council does not have a process to identify how the Chairman or Vice Chairman of the Disaster Council is selected. As a consequence, the twice-yearly meetings have not been scheduled.
- **F3:** Without a selected Chairman or Vice Chairman of the Humboldt County Disaster Council to appoint members to the Disaster Council, most of the Disaster Council membership slots defined in the 2011 ordinance, as well as recently state-mandated slots such as culturally diverse communities, remain vacant, which leads to no oversight of the existing 2015 Humboldt County Emergency Operations Plan.
- **F4:** No evidence could be found that the existing 2015 Humboldt County Emergency Operations Plan has been completely reviewed or revised by Humboldt County since 2015. As a consequence, emergency response may be uncoordinated and delayed, and the public may not be authoritatively advised on proper emergency preparedness.
- **F5:** The Humboldt County Office of Emergency Services is understaffed, which contributes to a lack of capacity to revise and update its Emergency Operations Plan.
- **F6:** The existing Humboldt County Emergency Operations Plan has yet to be reviewed or commented upon by the California Office of Emergency Services. As a consequence, there may be flaws in the plan; emergency response may be uncoordinated and delayed, and the public may not be authoritatively advised on proper emergency preparedness.
- **F7:** Emergency preparedness training of the public is sporadic, due in part to lack of available staff. This lack of training leaves everyone to fend for themselves for an undetermined amount of time.
- **F8:** There are no easily understood and readily available printed copies of Humboldt County emergency evacuation plans, routes, and maps, even for reasonably foreseeable emergencies. This omission leaves everyone within Humboldt County without critical decision tools to respond to an emergency or disaster.

- **F9:** The contact lists of the Humboldt Operations Area (Humboldt County) are cumbersome, informal, out-of-date, and not uniformly available among the emergency agencies. They presently have numerous errors and omissions, which can potentially lead to delays in the coordination of emergency responses.
- **F10:** Humboldt County officials take Pacific Gas & Electric’s assertions regarding the safety of the Independent Spent Fuel Storage Installation at face value. There is no Independent Spent Fuel Storage Installation component or business plan included in the County’s 2015 Emergency Operations Plan. This omission may lead to a delay in emergency responses and hazard mitigation.

RECOMMENDATIONS

The Humboldt County Civil Grand Jury recommends that:

- **R1:** The Humboldt County Board of Supervisors fully staff and schedule the Disaster Council’s meetings by no later than December 31, 2023. **(F1, F2, F3)**
- **R2:** The Humboldt County Board of Supervisors expand the Disaster Council’s required membership, which includes state-mandated members from culturally diverse communities, utilities, and emergency communications, as well as the integration of interpreters and translators by no later than December 31, 2024. **(F3)** (See Funding Recommendation under **R5**)
- **R3:** The Humboldt County Board of Supervisors direct the Humboldt County Disaster Council in coordination with the Humboldt County Sheriff’s Office of Emergency Services to submit a comprehensively updated Emergency Operations Plan by no later than December 31, 2024. **(F4, F5, F6)**
- **R4:** The Humboldt County Sheriff clarify the chain of command and direction of the Community Emergency Response Team (CERT) and other local volunteer emergency preparedness groups by no later than December 31, 2023. **(F7)**
- **R5:** The Humboldt County Sheriff direct The Humboldt County Office of Emergency Services to write and print for release an easily-understood emergency preparedness handbook, including emergency evacuation routes and destination maps to all county residents and visitors by no later than March 31, 2024. **(F8)**
 - Funding Recommendation: The Grand Jury recommends that the Humboldt County Board of Supervisors fund the expenses listed in **R2** and **R5** with existing appropriations in the current fiscal year. If current appropriations are not sufficient, the Grand Jury recommends that the BOS, at its next earliest opportunity, pursue additional funding from an appropriate agency, including state or federal agencies.

- **R6:** The Humboldt County Sheriff direct the Humboldt County Office of Emergency Services to update its contact directory annually and distribute it among the pertinent county emergency agencies and local volunteers serving on the existing Humboldt County Operational Area group, no later than December 31, 2023. **(F9)**
- **R7:** The Humboldt County Sheriff direct the Humboldt County Office of Emergency Services to include a completely updated Humboldt County Emergency Operations Plan that includes an annex or contingency plan, addressing any Independent Spent Fuel Storage Installation-related emergencies by no later than December 31, 2024. **(F10)**

REQUEST FOR RESPONSES

Pursuant to California Penal Code sections 933 and 933.05, the Grand Jury requests each entity or individual named below to respond to the enumerated Findings and Recommendations within specific statutory guidelines.

Responses to Findings shall be either:

- The respondent agrees with the finding
- The respondent disagrees wholly or partially with the finding; in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.

Responses to Recommendations shall be one of the following:

- The recommendation has been implemented, with a summary regarding the implemented action
- The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation
- The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a time frame for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency where applicable. This time frame shall not exceed six months from the date of the publication of the Grand Jury report.
- The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.

Pursuant to Penal Code section 933.05, the following responses are required:

REQUIRED RESPONSES - Within 90 days:

The Humboldt County Board of Supervisors (all findings and recommendations)

REQUIRED RESPONSES - Within 60 days:

The Humboldt County Sheriff (all findings and recommendations)

RESPONSES ARE TO BE SENT TO:

The Honorable Judge Kelly L. Neel
Humboldt County Superior Court
825 5th Street, Eureka, CA 95501

The 2022-2023 Humboldt County Civil Grand Jury
825 5th Street, Eureka, CA 95501

Notice: Reports issued by the Grand Jury do not identify individuals interviewed. Penal Code section 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Grand Jury.

APPENDIX

Cal OES Procedure: County Emergency Operations Plan (EOP) Review Process - February 6, 2023

The California Governor’s Office of Emergency Services (Cal OES) reviews County Emergency Operations Plans (EOPs) and offers recommendations for improvement. Recent legislation amended Government Code 8593.3.2, 8593.9, and 8610 to require that Cal OES review 10 county EOPs each year. The legislation also specifies items to be reviewed, requires that Cal OES provide technical assistance, and establishes a by-request Access and Functional Needs (AFN) Consultation. Cal OES is required to review county EOPs. An Operational Area (OA) EOP is considered a county EOP if the OA EOP includes the county. A complete review submission includes all EOP annexes and appendices. Intersecting, stand-alone plans should also be submitted if the crosswalk elements are met by those documents. The EOP is reviewed against an EOP crosswalk (completed by the county). (Other jurisdictions, such as cities, special districts, or tribes, are welcome to use the crosswalk, but a Cal OES review is not required.) The Cal OES review will maintain existing relationships and enroll subject matter experts. The Region ESC remains the point of contact for the County and reviews the plan for compliance with Federal Emergency Management Agency Comprehensive Planning Guide (CPG) 101 and the California Standardized Emergency Management System (SEMS). The Community Planning Unit coordinates the reviews. A panel of subject matter experts evaluates specific areas of the plan. AFN Consultations (when requested) will be executed by the Cal OES Office of Access and Functional Needs. Cal OES will select 10 existing plans each year for review. Counties will be notified in advance. Additionally, Cal OES will review plan updates. Plan updates should be submitted to Cal OES 90 days prior to approval/adoption to allow time for the review and incorporation of recommendations.

Cal OES OEP Review Process

Counties should expect to follow this process for EOP reviews:

1. Submission prompted.
 - a. Updated plans should be submitted to Cal OES for review 90 days prior to desired adoption and approval.
 - b. Existing plans should be submitted to Cal OES for review upon request. Cal OES will determine a yearly EOP review schedule and communicate that schedule to the affected counties.
2. Crosswalk completed. Counties will complete the EOP Crosswalk to demonstrate how each element is met by the plan, intersecting plans, or the planning process. Counties will indicate their desire for an AFN Consultation on the crosswalk.
3. Plan submitted. Counties will submit a digital version of the plan to the Cal OES Region ESC. The submission should include the plan; pertinent annexes and appendices; intersecting, stand alone plans; and the completed EOP Crosswalk.
4. Technical assistance begins. During the review process, reviewers will reach out to the county contact to ask questions, gain clarification, and offer minor recommendations.
5. Feedback received. Counties will receive the review feedback in a Summary Report (and AFN Consultation letter, if requested) upon completion of the review.
6. Feedback integrated. Counties may integrate recommendations from the Summary Report into the EOP or EOP planning process as appropriate.
7. Final plan submitted. Plans should be submitted to the Cal OES Region after approval and adoption (for plan updates) or revision (for existing plans).