



August 29, 2014

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Charles Rabamad,
Assistant Director for Recovery
Response and Recovery Division
Public Assistance Section
3650 Schriever Avenue
Mather, California 95655

Re: California Emergency Disaster Proclamation Process and CDAA Fact Sheet

Dear Mr. Rabamad:

On behalf of the California State Association of Counties (CSAC), I want to thank you for providing counties with the opportunity to provide comments on the Draft California Emergency Disaster Proclamation Process and the California Disaster Assistance Act (CDAA) Fact Sheet. This information is important to California's counties given their role as managers and coordinators of the overall emergency response and recovery activities within their communities.

We have reviewed the draft fact sheet and the comments submitted by counties and offer the following recommendations:

- To improve its usability by local government, the fact sheet's representation of the disaster emergency proclamation process and the CDAA funding process should include additional details regarding how these processes are implemented.
- Where feasible, the fact sheet should include specific considerations or factors that affect whether, or when a Governor is likely to proclaim a state of emergency.
- Regarding verification of damages, it is important that Cal OES staff be made available quickly following a disaster to help facilitate the assessment and verification process. This is especially important for rural counties that quite often lack resources to prepare the extensive paperwork in the aftermath of a disaster and respond to requests from Cal OES for additional information. The fact sheet should indicate the specific information needed and why it is needed.
- The fact sheet should include an explanation as to how various factors are evaluated in their totality, possibly using a flow chart or matrix. An alternative approach would be to include a brief description of each factor and how it is applied.
- The fact sheet should separate public and individual assistance criteria.
- Regarding the CDAA funding process, we recommend the development of a response time for state review and response, and the development of a formal appeal process in the event that funding is denied.



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We urge you to seriously consider these recommendations in conjunction with those offered by individual counties. As you know, some trepidation has been expressed by counties that this fact sheet and the tools described will be used by the state to disqualify funding to local agencies. This is why it is imperative that the proclamation and funding process be informative and transparent.

Thank you again for providing us with the opportunity to comment. We welcome the opportunity to have additional discussions with you, the director and other Cal OES officials regarding any of the issues noted above.

Sincerely,

A handwritten signature in black ink that reads "Karen Keene".

Karen Keene
CSAC Senior Legislative Representative