

Request for Comments

Docket ID: FEMA-2026-0265

Agency: California Governor's Office of Emergency Services (Cal OES)

California appreciates the opportunity to comment on FEMA's proposed extension of the information collection requirements associated with requests for Preliminary Damage Assessments (PDAs), requests for supplemental disaster assistance, appeals, and requests for cost share adjustments. While these comments are informed by California's operational experience administering disaster recovery programs, they are specifically intended to improve the effectiveness, efficiency, and practical utility of the information FEMA collects and relies upon when evaluating these requests.

California's recommendations are based on repeated challenges encountered during the collection, submission, review, and evaluation of disaster assistance documentation. These challenges increase the administrative burden on applicants and FEMA alike, delay funding decisions, and reduce the overall utility of the information collection process. Accordingly, the recommendations below are offered to improve the quality, clarity, timeliness, and usefulness of the information collected under this information collection request.

FEMA should streamline the information collection required during the PDA process by eliminating duplicative documentation requests, standardizing required data elements, and improving guidance for applicants. These changes would reduce administrative burden while improving the quality and consistency of the information FEMA receives.

Evaluate whether the proposed data collection is necessary for the proper performance of the agency, including the practical utility of the information.

1. Cal OES appreciates FEMA's efforts to update the Preliminary Damage Assessment (PDA) process through the revisions captured in the 2025 PDA Guide. However, current PDA documentation requirements are not feasible during initial assessments and create significant administrative burden for state, local, and Tribal partners. Examples include Appendix I and K from the 2025 PDA Guide which detail documentation requirements including but not limited to contracts, invoices, and detailed debris removal quantities. These documents are rarely obtainable in the immediate aftermath of a disaster, when conditions on the ground are still focused on public safety and response. Cal OES requests that FEMA:
 - a. Remove detailed cost / supporting documentation from PDA requirements.
 - b. Limit PDA documentation requirements to data points which are realistically obtainable in the field after an event.

- c. Clarify and standardize which elements are essential to support a declaration justification.

Enhance the quality, utility, and clarity of the information collected.

2. FEMA provides an overview of artificial intelligence (AI) use cases within the agency as part of the Simplified DHS AI Use Case Inventory. However, the inventory lists AI geospatial damage assessments as “inactive”, “retired”, and “discontinued”. Cal OES recommends FEMA:
 - a. Clarify the status of AI geospatial assessment tools available for state-FEMA coordination.
 - b. Ensure PDA requirements reflect actual AI capabilities (see comment 1a).
3. In recent disasters (e.g., Typhoons Sinlaku and Bavi), FEMA's Response Geospatial Office leveraged advanced commercial GIS, including ICEYE Flood Insights to collect and analyze flood area and depth data at an individual structure-level. Integrating FEMA's geospatial flood inundation data with California's Fire Integrated Real-Time Intelligence System Program (FIRIS) could immediately enhance state capabilities to meet FEMA's goal of understanding the full extent of disaster impacts within 72 hours post-incident. This technology could enable Cal OES and FEMA to perform remote PDAs in lieu of costly and time-consuming joint PDAs. In instances where combined geospatial datasets do not clearly indicate that the damage exceeds state capacity, field assessments or supplemental remote sensing tools could serve as a secondary validation mechanism.
 - a. Cal OES requests that FEMA expand data sharing agreements between FEMA and state / local emergency management agencies to enhance the quality and efficiency of damage assessment data collection and to create a joint common operating picture. For example, during California's 2022 / 2023 Winter Storms and Flooding events, Cal OES access to key FEMA flood inundation data was limited and hindered the state's ability to fully assess impacts across the state and support effective community recovery.

Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology e.g., permitting electronic submission of responses.

4. California maintains advanced geospatial datasets including CAL FIRE burn severity maps, Department of Water Resources (DWR) flood modeling, California Earthquake Clearinghouse data, and Cal OES GIS damage layers, which are often more detailed and current than FEMA provided national-

level datasets (e.g., National Risk Index, FEMA flood data, and satellite-based damage assessments). FEMA currently accepts CAL FIRE Damage Inspection data (i.e., DINS) for damage assessments. Leveraging these state-maintained datasets reduces duplicative information collection requirements and allows FEMA to rely on validated data already produced within California.

- a. Cal OES would like to request that FEMA consider reviewing and accepting a wider range of state-level geospatial datasets to substantiate damages and consider establishing clear data acceptance criteria to streamline damage assessments and minimize costly, manual, and time-consuming assessment processes.
5. California frequently experiences overlapping or long-duration disasters that evolve over several weeks, such as successive atmospheric river storms or multi-county flood events. These incidents often produce compounding physical conditions, where damage from the initial event directly amplifies impacts from subsequent ones. Despite this operational reality, FEMA's current process treats each event as a separate, unrelated incident. When storms are not linked by a single weather system or occur more than 72 hours apart, FEMA requires independent PDAs, documentation packages, cost estimates, and declaration requests. This approach does not account for the cumulative or cascading impacts that arise when prior conditions worsen damage from the next event. Treating these events as fully isolated incidents understates the true cumulative impacts and multiplies documentation requirements for state, local, and Tribal partners already operating under surge conditions.
 - a. California requests that FEMA provide greater flexibility to consolidate related incidents into a single declaration, or amend an initial declaration, when hazards occur within a compressed timeframe or produce clearly compounding impacts. Cal OES further recommends that FEMA establish streamlined PDA procedures for overlapping or cascading events, including combined documentation packages, consolidated cost estimates, and unified incident period guidance. These changes would reduce duplicative administrative requirements, shorten declaration timelines, and better align FEMA's process with the cumulative and evolving nature of California's disaster environment.
6. Heat domes create prolonged extreme-heat conditions that depress fuel moisture across large regions and drive multiple, concurrent wildfire ignitions. Although NOAA and the National Weather Service routinely identify heat domes as the atmospheric mechanism behind these events, FEMA's current framework treats each resulting fire as an isolated incident. While individual fires under a heat dome may not independently exceed state capacity, the cumulative impact of multiple concurrent fires across the dome's footprint can rapidly overwhelm mutual aid resources in ways isolated events do not.

This operational reality forces states to produce separate PDAs, documentation packages, cost estimates, and declaration requests for fires that are clearly linked by a single, persistent meteorological phenomenon.

- a. Cal OES requests that FEMA formally recognize heat domes as a connecting event within the disaster declaration framework, similar to the existing treatment of Red Flag Fire Warnings. Establishing heat domes as an eligible linking mechanism would allow states to consolidate documentation, submit unified PDA materials, and reduce duplicative information collection.
7. Modify the existing Individual Assistance (IA) criteria, reviewing the totality of the circumstances and assigning appropriate weight to other criteria impacting the communities, as opposed to relying on what are often outdated and misleading figures to determine the state's fiscal capacity.
- a. A significant and growing number of California wildfire survivors are severely underinsured, leaving them unable to fully cover the costs of rebuilding after a catastrophic loss. California's wildfire-prone environment, combined with rapidly rising construction costs, limited availability of homeowners' insurance in high-risk areas, and insurer non-renewals, means many survivors discover only after disaster that their policies do not remotely match the true cost of recovery. Even homeowners who believed they had comprehensive coverage are routinely underinsured for debris removal, code upgrades, replacement materials, temporary housing, and the full cost of rebuilding in California's complex regulatory and construction environment.
 - b. This underinsurance gap directly results in thousands of survivors requiring FEMA Individual Assistance funding simply to reach a baseline level of recovery, even when they have insurance. FEMA's current IA declaration factors do not meaningfully capture this reality, nor do they account for the disproportionate impact on rural, low-income, tribal, and disability communities where insurance coverage options are the most limited. For California, underinsurance is not an isolated problem, it is a systemic condition that dramatically increases survivor needs and undermines local and state recovery capacity. FEMA's IA criteria must therefore incorporate underinsurance as a core factor rather than treating it as a peripheral or optional consideration.
 - c. Wildfire survivors in California face extraordinarily long timelines before they can return to permanent housing—often multiple years—largely due to the unique complexities associated with wildfire debris, permitting, environmental cleanup, and post-disaster reconstruction. Unlike disasters that cause damage but leave structures intact,

- California wildfires frequently result in total structural loss, leaving properties covered in hazardous debris, toxic ash, heavy metals, and other contaminants requiring state and federal-managed debris removal programs before reconstruction can even begin.
- d. Once debris removal is complete, survivors must navigate insurance settlement disputes, rapidly escalating construction costs, significant contractor shortages, geotechnical evaluations, local permitting processes, rebuilding under updated fire or seismic codes, and utility infrastructure reconstruction. These steps occur sequentially, not concurrently, and each one adds weeks or months to the path to permanent housing. Consequently, FEMA's current focus on short-term or "traditional" disaster impacts does not reflect the long-term displacement reality facing California wildfire survivors, many of whom rely on FEMA financial assistance, housing programs, and case management for extended periods. Current IA declaration factors fail to consider these long recovery trajectories, despite the significant humanitarian and financial burden they place on individuals, communities, and the State. Recognizing and weighting the full complexity of destroyed-home timelines is essential to ensuring FEMA can accurately assess need in wildfire-impacted jurisdictions. The current criteria do not allow for meaningful deliberation or consideration of Individual Assistance factors and conditions outside of "traditional" FEMA disasters like hurricanes and floods.
 - e. Because California's total taxable revenue (TTR) is almost \$1.2 trillion, more than any other state in the country, the use of the state's TTR and gross domestic product in the first factor greatly limits the State's ability to receive federal assistance, especially when major incidents occur in rural areas. The IA declaration factors require a significant amount of time to obtain, and the factors themselves are not an effective measurement of California's need for federal assistance.