EMERGENCY OPERATIONS PLAN

Assessment Report and Recommendations

County of San Joaquin

November 2016

Table of Contents

EXECUTIVE SUMMARY

Recognizing its responsibility to protect the public from and mitigate the consequences of emergencies and disasters, the County of San Joaquin employed an emergency management consulting firm to review and assess the County's Emergency Operations Plan (EOP). This effort consisted of a formal review of existing County emergency plans using a customized EOP Assessment Tool and six facilitated focus area discussions. As an initial assessment of the current conditions, this report and associated recommendations form a solid foundation for a partial or comprehensive revision of the County's EOP.

The County's EOP and supporting documents reflect the national evolution of emergency management in their inconsistent organizational format and unclear relationships. The bulk of the content contained in these plans is solid but is challenging for County staff to access.

Key assessment findings and recommendations include:

1. **The EOP hierarchy is difficult to follow and the annexes do not adhere to a consistent format.**
   Although the content of each document is generally sound, the number and variety of EOP documents and document formats are challenging.

   Recommendations: Select a clear and consistent EOP hierarchy. Consolidate all current planning documents within the selected hierarchy and streamline content.

2. **The scope of plans attached to the EOP varies from strategic to tactical.**
   Currently, multiple plans attached to the EOP address only a small subset of County stakeholders such as a specific position in the Emergency Operations Center (EOC) or those managing field incident-level communications. While this information is important for that specific group or function, the effect of incorporating this 'tactical' information into the EOP makes the EOP complex and can effectively mask information that is important to the wider audience.

   Recommendations: Consolidate all current planning documents within the selected hierarchy and streamline content. Delineate which plans should be part of the EOP and which should remain internal to selected County departments of functions.

3. **County staff familiarity with, and understanding of, the EOP is minimal.**
   Most major emergency events are addressed by a relatively select number of staff who depend upon their personal experience to guide them. However, the EOP is intended to inform the much larger community during events which may exceed the response capacity of County departments and local stakeholders.

   Recommendation: Consider developing a regular and sustained method for socializing the EOP to County staff and key stakeholders.

4. **Legal authorities and key response partners must be reviewed and updated with current references and names.** The EOP references appropriate state legislation and the Stafford Act; however, the document fails to reference updated or new legal authorities that have established important criteria for planning and response.

Recommendation: Review current local, state, and federal legal authorities and update references, as needed, throughout the plan and supporting documents.

5. **Inclusion of and compliance with federal standards must be acknowledged throughout all emergency plans.** The documents the County provided include very few references to arrangements or planning for people with disabilities or others with access and functional needs. In some cases, considerations were included but no corrective action was identified.

   Recommendation: Review current federal authorities for additional planning considerations such as inclusion of people with disabilities, people with access and functional needs, and pet sheltering. Ensure compliance with ADA and other legal requirements and use consistent terminology in updating plans.

6. **Memoranda of understanding (MOUs) should be reviewed for completeness and expiration.** Multiple MOUs were found to be outdated, not fully executed or were unclear. While the agreements overview indicated that some of these agreements do not have an expiration date, the restructuring of many organizations suggests that these MOUs should be revisited and revised.

   Recommendation: Identify and review all current MOUs referenced in the EOP and annexes to assess the legal and operational validity of each agreement. Revisit unexecuted MOUs and re-engage identified partners for completion.

7. **The designation of the role of Director of Emergency Services could be amended.** San Joaquin County Code currently directs that the Chairman of the Board of Supervisors shall serve the Director of Emergency Services. Most local governments in California jurisdictions now designate the Chief Executive or Administrative Office as the Director of Emergency Services so as to maintain continuity within the emergency management organization, supervise day-to-day emergency preparedness activities, and leverage the executive/administrator's authority.

   Recommendation: Consider amending the County Code to designate the County Administrator as the Director of Emergency Services.

8. **Many current and affiliated annexes include incorrect or outdated information or are missing critical information.** Many of the Emergency Support Function (ESF) annexes reviewed are incomplete, out of date, inconsistently formatted or not well integrated with each other or the EOP Basic Plan. Most existing annexes do not reference or incorporate emergency response planning documents developed by individual agencies or for specific threats/hazards.

   Recommendations: Develop a standardized format for all ESFs that follows federal guidance and proactively transition to alignment with the federal standard. Clarify and update lines of authority and orders of succession through all planning documents consistently. Revise or develop content for those ESFs as identified in this report.

9. **The County relies heavily on the American Red Cross.** The current Mass Care plan indicates a high reliance on the American Red Cross as the primary agency for providing mass care support.

   Recommendations: Create a formal and detailed County-based mass care plan with transition procedures between organizations. Review validity of formal MOUs and Memoranda of Agreement with

service providers and mass care partners. Assess the capability of County departments to support this function.

10. **Disaster Recovery warrants an expansion of effort.**
Recent events have repeatedly demonstrated that disaster recovery activities are often more challenging for local jurisdictions than response. Current County disaster recovery plans are dated and incomplete.

Recommendations: Consider developing a separate Recovery Operations Plan to complement the EOP and provide enhanced guidance to County and Operational Area stakeholders.

INTRODUCTION AND METHODOLOGY

The County of San Joaquin recognizes its responsibility to protect the public from and mitigate the consequences of emergencies and disasters. Attentive to this responsibility, the County of San Joaquin contracted with Tetra Tech, Inc. (Tetra Tech) to review and assess the County's Emergency Operations Plan (EOP). The review process incorporated a standardized approach to evaluate emergency plans—more specifically, planning elements recommended by the Federal Emergency Management Agency (FEMA) and required to meet statutory requirements of the State of California and the Americans with Disabilities Act (ADA).

Much like other government documents that outline policy and process, an EOP should align with community priorities and the management culture of the organizations it is intended to assist. While adhering to local, state, and federal directives and guidance, the EOP is ultimately a reflection of the community it serves. However varied EOPs may be from jurisdiction to jurisdiction, there are several potential areas of improvement which the County of San Joaquin could address in future EOP revisions. This report presents a summary of key findings developed as part of a comprehensive EOP review. Detailed findings are included in the attached EOP Assessment Tool.

Plan Review Methodology

As an initial step in the EOP review, Tetra Tech submitted formal requests to the County departments identified for all documents potentially related to the EOP, including:

- Current EOP
- Hazard Mitigation Plan (HMP) or Threat and Hazard Identification & Risk Assessment (THIRA) (or both)
- Regional or State EOP
- Emergency Operations Center (EOC) Standard Operation Procedures (SOPs)
- Ordinances regarding emergency management (declaration of disaster, resource management, and related documents)
- Mutual aid agreements
- Any operational level response and recovery plans (earthquake, pandemic, wildfire, EMS, public health, and alert/notification)

In response, the County provided 277 documents. The Tetra Tech assessment team inventoried these documents and organized them in two categories: EOP-related and supporting references. The supporting references include a variety of materials, including SOPs for specific groups, tactical response coordination maps, forms, and guidance. All documents were posted on the project SharePoint site.

Tetra Tech developed an EOP Assessment Tool that addresses more than 90 industry standards and best practices for disaster recovery and emergency management. The tool includes both a qualitative and quantitative component. In developing the tool, Tetra Tech referenced the following legislation, standards and guidance documents:

- National Fire Protection Association (NFPA) 1600 Standards on Disaster/Emergency Management and Business Continuity, 2016 edition
- National Response Framework (NRF), 2nd Edition

- National Incident Management System (NIMS)
- FEMA Continuity Guidance Circular (CGC) 1, 2013
- Federal Continuity Directive 1, 2014
- Homeland Security Exercise Evaluation Program (HSEEP), 2013
- Presidential Preparedness Directive "National Preparedness" (PPD-8)
- Pandemic and All Hazards Preparedness Act of 2006
- Public Health Security and Bioterrorism Preparedness and Response Act of 2002
- Post-Katrina Emergency Management Reform (PKEMRA) Act, 2006
- Emergency Management Accreditation Program (EMAP) Emergency Management Standards, 2013
- FEMA Comprehensive Preparedness Guide (CPG) 101, version 2.0
- California State Emergency Management Plan, Standardized Emergency Management System (SEMS), 2011
- California Standardized Emergency Management System (SEMS) Guidelines, 2009
- California Emergency Services Act (Government Code Sections 179 and 8550-8692
- California Guide for Local Government Emergency Proclamations, 2014
- California Office of Emergency Services Emergency Function Annex Outline Comparison Guide, 2012
- State of California Master Mutual Aid Agreement, 1950
- San Joaquin County Code, Title 4 (Public Safety), Division 3 (Civil Defense and Disaster), Chapter 1

Once the County approved the EOP Assessment Tool, the assessment team began reviewing the EOP-related documents, recording observations and identifying potential areas for improvement. Interim findings were developed in early July 2016 and were presented to the EOP Steering Committee.

Utilizing the interim findings report, the assessment team then facilitated in-person discussion sessions of initial observations and findings in October 2016. Six critical functional areas were identified as having the greatest potential opportunity for shared interests and input regarding the EOP and supporting documents. These areas also represented 80% of the emergencies that County staff may need to address most. The following six areas formed the basis for the facilitated discussions:

- Flood
- Mass Casualty/Active Shooter
- Fire/Hazardous Materials
- Care and Shelter
- Heat and Freeze
- Support Services

These functional area sessions provided an opportunity to clarify aspects of the planning documents, obtain proper perspective of plan elements, identity additional documents or areas deserving of further review, and gain a fuller understanding the operational environment. Each session provided participants with an overview of the EOP Assessment Project, overall interim findings, gaps in documentation, and potential recommendations for EOP revisions as well as issues specific to each functional area.

Additional stakeholders may have additional plans, standard operating guides, or protocols; however, these documents were not considered for this review.

Next Steps

As an initial assessment of the current conditions, this report and associated recommendations form a solid foundation for a partial or comprehensive revision of the County's EOP. In line with FEMA's six step planning process (see Figure 1 below), this report completes Step 2 (Understand the Situation) as well as partially satisfies efforts to develop a planning team as well as determining goals and objectives.
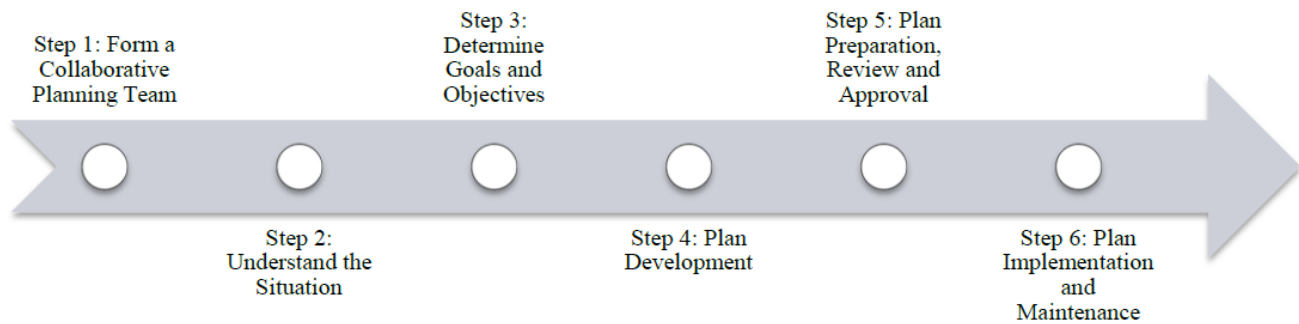

Figure 1: FEMA Steps in the Planning Process

ASSESSMENT RESULTS

One: Scope and Relationship of Component Plans

Currently, the County's EOP consists of several elements:

- Basic Plan
- Emergency Support Function (ESF) Annexes (for example, Transportation) (15 in total)
- Support Annexes (for example, Warning) (9)
- Threat or Incident-Specific Annexes (for example, Flood/Dam Failure) (6)

The EOP hierarchy is difficult to follow and the annexes do not adhere to a consistent format. Although the content of each document is generally sound, the number and variety of EOP documents and document formats are challenging. Although the new EOP does directly adhere to the CPG-101 ESF format in organizing the majority of component documents, it could provide a clearer explanation of the relationships of the documents to one another and where details of coordination intersect. The MACS EOC SOP and Procedures documents provide additional details not included in the Basic Plan, ESF Annexes, Support Annexes, or Threat or Incident-Specific Annexes. The majority of these documents do not adequately cross-reference each other, leading to a disjointed series of documents.

Some ESF Annexes use the federal nomenclature: Emergency Support Functions (ESF-17 Volunteer and Donations Management). Others use the State of California nomenclature: Emergency Functions (EF-6 Mass Care). Others are not complete annexes but are identified as such (ESF-13 Law Enforcement or ESF-15 Public Information). All documents in the Basic Plan are referred to as ESFs annexes.

A number of annexes are significantly outdated or do not adhere to a consistent format. This can prove challenging to readers who seek to refer to multiple annexes. Across the multiple planning documents reviewed, information is duplicated in number of instances. For example, the EOP Warning Annex reiterates rather than supplements much of the information found in the ESF-2 Communications Annex.

The scope of plans attached to the EOP varies from strategic to tactical. FEMA's Community Preparedness Guide defines three levels of emergency plans that a local government must in integrate – each serves a different purpose and speaks to a different audience.

- *Strategic Plans* describe how a jurisdiction will meet its long term emergency management goals. These detail the policies and authorities that will guide emergency response.
- *Operational Plans* describe roles and responsibilities, specific tasks, and how stakeholders will integrate their efforts.
- *Tactical Plans* focus on managing the people, equipment and resources used to directly address key response goals and objectives. These may be specific to a location or discrete function.

Figure 2 below illustrates the relationship among these types of emergency plans.

Strategic
Policy objectives and overall guidance

Operational
Roles and responsibilities, tasks, integration, and actions

Tactical
Personnel, equipment, and resource management

Figure 2: Types of Emergency Management Plans

Whichever planning hierarchy is selected, the EOP must be developed and speak to its audience, which in this case is County leadership, departments, allied agencies, and Operational Area stakeholders. The key to success is delivering the appropriate level of information to the appropriate audience.

Currently, multiple plans attached to the EOP address only a small subset of the larger audience such as a specific position in the EOC or those managing field incident-level communications. While this information is important for that specific group or function, the effect of incorporating this 'tactical' information into the EOP makes the EOP complex and can effectively mask information that is important to the wider audience.

Some of these plans could be included by reference or, if necessary, consolidated or summarized into the appropriate ESF or Support Annex. For example, the Tactical Interoperable Communications Plan (TICP) could be referenced in ESF-2 but should probably not be attached to the ESF-2 annex. Another option is to fully realize the EOP hierarchy and designate many of these agency-specific or procedural plans as supporting documents. These documents can be referenced by the EOP but reside with and be maintained by the departments and agencies that they serve. Focusing on the intended audience will help ensure that the scope of each EOP document remains effective and relevant.

County staff familiarity with, and understanding of, the EOP is minimal. This is the most common situation in jurisdictions that have not experienced significant major emergency or disaster events in the recent past. Most events are addressed by a relatively select number of staff who depend upon their personal experience to guide them through response activities. However, the EOP is intended to inform the much larger community during events which may exceed the response capacity of County departments and local stakeholders. As the EOP is

revised, the County could consider extending stakeholder participation efforts to not only improve the final product but also develop a higher profile for the effort and potentially additional stakeholder buy-in.

Recommendations:

1. Identify and select a clear EOP hierarchy. Options include:

    a. **Emergency Support Function.** The EOP is organized into a Basic Plan plus Emergency Support Function Annexes, Support Annexes, and Hazard-Specific Annexes. This is the model the new (May 2016) County EOP seeks to implement. Given its size and its dual mission as the Operational Area lead, this is the recommended approach for the County.

    b. **Traditional Functional.** The EOP is organized into a Basic Plan plus Functional Annexes and Hazard-Specific Annexes. This arrangement most closely resembles the County's current EOP hierarchy.

    c. **Linear/Hazard-Specific.** The EOP is organized into sections that align with the timeline of disaster response: General Information, Response, Extended Response, Recovery, supporting documents, and Threats/Hazards overview.

    d. **Agency/Department.** The EOP is organized into a Basic Plan plus Hazard-Specific Annexes for each department. This scheme is not recommended for larger or more complex jurisdictions. The County's role as the Operational Area Coordinator would make this approach difficult.

    e. **Concept and Policy – Executive Summary Approach.** Operational details are contained in Functional Annexes and organization-specific supporting plans and documents. This organization may be appropriate depending the County's existing approach to communication and planning.

2. Consolidate all current planning documents within the selected hierarchy and streamline content. Delineate which plans should be part of the EOP and which should remain internal to selected County departments of functions.

    a. **Basic Plan.** Establish overall authorities and legal requirements, the planning update cycle, agency roles and responsibilities, and all basic elements of emergency response from event to event.

    b. **Annexes.** Consolidate and minimize the number of annexes. One exception: consider breaking out ESF#14 Recovery and developing a stand-alone Operational Area Recovery Operations Plan in recognition of the major functions associated with recovery including damage assessment, debris removal, post-disaster housing, and finance.

    c. **Cross References.** Include cross references among plans to make it easy for the reader to find relevant information and to avoid duplication. The EOP acknowledges partner plans and provides crosswalks to these partners and plans that fit into the overall common operating picture for each corresponding annex. *(Note: Duplicating the same or similar information in multiple plans can lead to potential issues with updates.)*

3. Consider extending stakeholder participation efforts during the EOP revision and update process in order to develop a higher profile for the effort and potentially obtain increased stakeholder buy-in

4. Consider developing a regular and sustained method for socializing the EOP to County staff and key stakeholders. These efforts could include posting non-sensitive portions of the EOP on the County

website, providing on-going EOP orientation briefings for County leadership, developing an abbreviated, just-in-time, EOP orientation course for activated County staff, or incorporating a brief overview of key EOP concepts and policies as part of new employee orientation.

5. Detail all local agencies, departments, stakeholders and service providers involved in the EOP update and identify which should be contacted for future updates and annual revisions. Include a representative from the primary ESF organization on the promulgation page for each ESF.

6. Consolidate a methodology subsection to include more detail on distribution procedures and a distribution list for EOP revisions.

7. Establish a uniform review schedule for all components of the EOP, including all annexes, to make sure cross references are consistent and all components are current. Utilize the FEMA CPG 101 plan maintenance approach as illustrated in Figure 3 below.
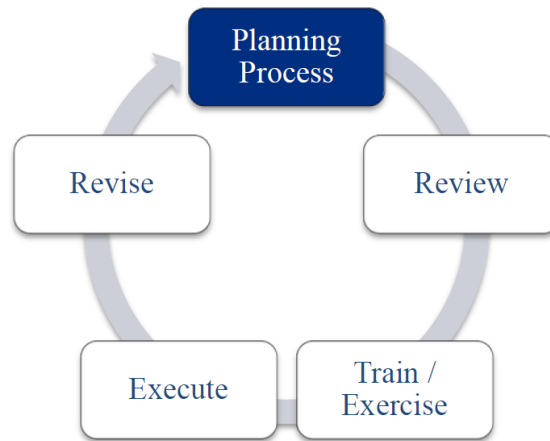
Figure 3: Planning Cycle

Two: Legal Authorities and Updated Guidance

Legal authorities and key response partners must be reviewed and updated with current references and names. The EOP references appropriate state legislation and the Stafford Act; however, the document fails to reference updated or new legal authorities that have established important criteria for planning and response. For example, in the aftermath of Hurricane Katrina (2005), the Post-Katrina Emergency Management Reform (PKEMRA) Act (2006) established new authorities for federal entities and requirements for local jurisdiction planning. These additional authorities should be reviewed for planning considerations and requirements. EOP annexes should be reviewed and compared where legislation is referenced in the annex but not in the Basic Plan. The following should be reviewed, and plans should be updated to include information within them:

- Post-Katrina Emergency Management Reform (PKEMRA) Act, 2006
- Rehabilitation Act of 1973 and the Fair Housing Act
- Older Americans Act of 1965
- Pets Evacuation and Transportation Standards (PETS) Act of 2006

Inclusion of and compliance with federal standards must be acknowledged throughout all emergency plans. The concept of "Whole Community Planning" should be integrated into the plan update. The documents the County provided include very few references to arrangements or planning for people with disabilities or others with access and functional needs. In some cases, such as EF-15 – Public Information, there is no reference to arrangements or planning for people with disabilities or others with access and functional needs. In some cases, considerations for people with disabilities or others with access and functional needs were included but no corrective action was identified (ESF-2 Communications: Section G(vi) – Communications Accessibility). Currently, only EF-6 Mass Care and Annex E include focused discussion regarding arrangements or planning for people with disabilities or others with access and functional needs. However, these discussions do not provide a complete representation of proactive planning and response for people with disabilities or access and functional needs. Planners should review available standardized concepts and definitions, documents, and engagement strategies to identify key planning assumptions, considerations, points of coordination, and gaps that may be addressed through community collaborations.

The term "access and functional needs populations" as a title has incorrectly been interpreted as or substituted for the term "access and functional needs," which are circumstances that must be met during disasters. For example, an individual may have an access or functional need but may not have a disability. If the term "disability" is removed from the title, legal requirements that apply to individuals with disabilities are likewise removed (for example, EF-6: Mass Care – Planning Assumption 9).

As noted in the Presidential Preparedness Directive (PPD-8), many individuals with disabilities and others with access and functional needs are protected by nondiscrimination provisions in federal civil rights law and policies. The County should review current planning guidance such as FEMA Whole Community Approach to Emergency Management: Principles, Themes and Pathways for Action to ensure that emergency response and recovery plans fully account for the provision of assistance, inclusion, and integration of people with disabilities and others with access and functional needs. Current Department of Justice guidance requires that ADA considerations be integrated into all elements and policies of the EOP and not limited to key functions such as care and shelter.

Terminology should be standardized in all emergency management plans. Planners should review all emergency management plans and supporting documents to ensure that plans appropriately reference people with

disabilities and others with access and functional needs. The County should use the term "people with disabilities and others with access and functional needs" or "disproportionately impacted populations such as those with limited English proficiency, people who are homeless, or people who are economically disadvantaged." People-first language focuses on the person first and the disability second. For example:

- Traditional phrasing: "the hearing impaired" or "wheelchair bound"
- People-first language: "people who are hearing impaired" or "people who use a wheelchair"

Memoranda of understanding (MOUs) should be reviewed for completeness and expiration. During a review of the MOUs provided, multiple MOUs were found to be extremely outdated. While the agreements overview indicated that some of these agreements do not have an expiration date, the restructuring of many organizations suggests that these MOUs should be revisited and revised. For example, the 1975 American Red Cross MOU indicates that the agreement is between the San Joaquin Chapter of the American Red Cross and the County of San Joaquin. The San Joaquin Chapter of the American Red Cross no longer exists after the American Red Cross organizational restructure via the One Red Cross Initiative beginning in 2010. Both these MOUs are currently being revised.

Some MOUs were not executed or were unclear. For example, the School Crisis MOU does not delineate the specific schools participating in the agreement. Similarly, the Cooperative Agreement for the Provision of Incident Command Staff from 2002 was not executed according to the copy on file.

Designation of the role of Director of Emergency Services. San Joaquin County Code (Title 4, Division 3, Chapter 1) currently directs that the Chairman of the Board of Supervisors shall serve as the Director of Emergency Services. The Chairman of the Board of Supervisors is elected annually. Most local governments in California jurisdictions now designate the Chief Executive or Administrative Office as the Director of Emergency Services so as to maintain continuity within the emergency management organization, supervise day-to-day emergency preparedness activities, and leverage the executive/administrator's authority and effectiveness in directing the actions of the local government.

Recommendations:

1. Review current local, state, and federal legal authorities and update references, as needed, throughout the plan and supporting documents.

2. Include and update terminology (where applicable) related to people with disabilities and others with access and functional needs as well as ensure consistency across all planning documents.

3. Review current federal authorities for additional planning considerations such as inclusion of people with disabilities, people with access and functional needs, and pet sheltering.

4. Ensure compliance with ADA and subsequent legal requirements and use consistent terminology in the process of updating plans. For example: "people with disabilities and others with access and functional needs." Consider accessing existing community advisory groups.

5. Reference suggested resources:

   a. FEMA Whole Community Approach to Emergency Management: Principles, Themes and Pathways for Action

b. ADA Best Practices Tool Kit for State and Local Governments Chapter 7 - Checklist for Emergency Management

c. An ADA Guide for Local Governments - Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities

6. Identify and review all current MOUs referenced in the EOP and annexes to assess the legal and operational validity of each agreement. Revisit unexecuted MOUs and re-engage identified partners for completion.

7. Update the Agreement_Overview_OA worksheet, identify gaps in current coverage and maintain this document in the same location as all executed MOUs.

8. Consider amending the County Code to designate the County Administrator as the Director of Emergency Services.

Three: Annexes and Emergency Support Function Alignment

Many current and affiliated annexes include incorrect or outdated information or are missing critical information. Many of the ESF annexes reviewed are incomplete, out of date, inconsistently formatted or not well integrated with each other or the EOP Basic Plan.

Most existing annexes do not reference or incorporate emergency response planning documents developed by individual agencies or for specific threats/hazards. For example, the Sheriff has an active shooter protocol and EMS has developed an Active Threat Plan but these are not integrated or linked in any EOP annex. Given unique nature of an active shooter incident – the speed at which it unfolds, the tremendous public information mission, and the complexity of the multi-disciplinary and multi-jurisdictional response required, the County could consider developing an annex specific to the active shooter threat that would leverage the existing work already done by various County departments and agencies.

ESF-1 (Transportation). Not evaluated. The EMS Long-Term Care Facility Evacuation Plan could be cross-referenced here or draw upon resources and processes identified in ESF-1 if necessary.

ESF-2 (Communications). 2015. This annex coordinates actions to provide the required telecommunications, and the restoration of the telecommunications infrastructure. This could be expanded upon to identify lead and supporting County agencies, clarify roles and responsibilities, integrate the separate appendices listed in older EOP plans as well as incorporate additional communications resources such as satellite voice/data and the Government Emergency Telecommunications System (GETS).

ESF-3 (Construction and Engineering). Although listed as a current EOP annex, the only ESF3 document provided is a two-page article regarding barricading stabilizing buildings post-disaster. The Public Works Department has developed several internal plans but these are not referenced or integrated with the EOP. A true ESF-3 annex could provide coordinating guidance for debris clearance, roads, highways and bridge repairs, engineering, construction, repair and restoration of essential public works systems and services, and the safety inspection of damaged buildings.

A sample model Debris Management Plan (2014) was provided but not assessed here. It is highly recommended that the County develop a Disaster Debris Management Plan (DDMP) and obtain Cal OES and FEMA approval. This DDMP could be linked to the EOP as an appendix to ESF-3.

ESF-4 (Fire and Rescue). Not part of the current EOP hierarchy (determined not needed). Challenges in providing service to the islands area could be more significant in a major emergency event. Fire services agencies rely on institutional memory during flood events rather than the EOP. The role of law enforcement in a major hazardous materials incident could be clarified and communicated.

ESF-5 (Management). No single ESF-5 Annex was provided. However, a number of supporting plans and procedures related to the function of the Emergency Operations Center (EOC) were provided and reviewed. These documents are intended only for EOC staff or even for very specific positions within the EOC. In order to maintain focus on the broader audience for the EOP, it is suggested that these be separated from the EOP and combined into an EOC Handbook.

EF-6 (Care and Shelter). 2014. Note: the version currently posted on public website is dated 2008. See also Section Five: Human Needs and Mass Care below. No single County agency or department is assigned primary responsibility for this function. This plan relies heavily on the American Red Cross for surveying, inventorying,

establishing and managing shelter operations. The ARC may not be able to support shelter operations in the unincorporated county areas or in incorporated cities. See also the discussion regarding MOUs in <u>Section Two: Legal Authorities</u> above. Although referenced, the Disaster Relief Coalition has not been active since 2012. It's is unclear if the County has in place contingency contracts for key resources such as food or bottled water.

The annex is incomplete: Information regarding children and access and functional needs populations is TBD. There are multiple references to additional documents which do not align with the current annex - for example, *Annex E – Care and Shelter, Appendix 2, Disaster Recovery Center (March 2013).* Note: the local center detailed in this appendix could be better described as a "Local Assistance Center" so as to avoid any confusion with a "DRC" which generally used for facilities operated by FEMA and/or Cal OES. This same appendix appears as Appendix 3 to Annex R (Recovery). *Appendix 5, People with Disabilities and the Elderly* should be eliminated with the content directly integrated into the annex and the EOP Basic Plan.

 The County should consider revising this annex to clearly indicate County departments with lead and supporting roles, address the mission areas listed above, integrate the supporting documents listed by reference, and incorporating community resource agencies and organizations. Consider also the use of graphic flow charts to communicate roles, responsibilities, and the flow of information and resources.

ESF-8 (Public Health and Medical Services). The ESFs reviewed do not contain guidance pertaining to Emergency Medical Services (EMS). Guidance regarding EMS traditionally falls under ESF-8, and information regarding EMS is lacking, overall. EMS receives a brief mention in the ESF-8 Scope of Plan (Section 1.2) and communications between Department of Homeland Security (DHS) and other agencies (Section 3.6.2). The assessment team did receive Annex D from the 1993 County Multi-Hazard Plan, and although this annex references EMS coordination, the assessment team assumed these references to have been superseded by the new EOP and ESF-8 annex.

The Multi-Casualty Incident (MCI) Field Operations and Control Facility plans available on the EMS website are State of California models from 1998. These are not specific to San Joaquin but do align with the new (2016) Active Threat Plan. The Active Threat Plan does address the employment of EMS in the event of an Active Shooter/Hostile Event through the use of the Rescue Task Force concept and the MCI model.

The Public Health plan of 2009 has been superseded. The Extreme Temperature Annexes (Heat and Freeze) were developed as stand-alone operational plans – County staff suggested maintaining them a separate documents rather than consolidating them. Staff did not support the suggestion for further delineating extreme temperature hazards in light of climate change. These could be revised to clarify activation trigger criteria, clarify public information roles, and identify methods for hazard communications outreach to vulnerable populations.

The Environmental Health Department Emergency Response Plan (2005) could be expanded to clarify missions, roles and responsibilities and serve as the basis for an element within a revised ESF-8 annex. These could include well sampling, damage assessment, and coordination with agricultural dairies.

ESF-9 (Search and Rescue). Not part of the current EOP hierarchy. Urban Search and Rescue (USAR) listed as being addressed in ESF-3. However, the assessment team did not assess as no ESF-3 annex was provided. Search and Rescue (SAR) is listed as being addressed in ESF-13.

FESF-11 (Agriculture). 2012. Although EF-11 is dated 2012, it appears that the majority of the language pre-dates 2012 significantly. For example, the annex references concepts outlined in the *California Local Planning Guide for Animal Disease* which was superseded in 2006. Likewise, the *California Natural Disaster Assistance Act* cited was superseded by the *California Disaster Assistance Act* in 1997. The livestock threat assessment is based on 2004

statistics. In addition, the County Department of "Social Services" is named, which has been superseded by the Human Services Agency.

ESF-13 (Law Enforcement). Although labeled as an ESF annex, the document identified as ESF-13 is an older annex to a previous version of the EOP. This annex does not address how resources would be managed, how resource priorities would be established, or how communications would support public safety functions. This ESF should also be renamed "Public Safety and Security."

ESF-14 (Recovery). 2009. See *Section Seven: Recovery* below.

ESF-15 (Public Information). 2003. ESF-15 contains information from 2003 and does not include vital mechanisms used by emergency services entities. For example, there is no reference to the use of social media platforms throughout the emergency management cycle. This information is inconsistent with the Basic Plan, which identifies social media as a primary method of alerting and warning the community in the County Initial Response Block Diagram located in Part 1, Section A, page A-10.

No single day-to-day position is identified as having responsibility for maintaining the Public Information process and capabilities. The County should consider revising this annex to identify key pre- and post- event roles and responsibilities related to public information as well as incorporate social media message delivery and monitoring.

There is a stand-alone Care and Shelter Public Communications Plan (2008) which duplicates much of ESF-15 and is not clearly linked to other elements in the EOP.

Continuity of Operations (COOP) / Continuity of Government Annex. Not evaluated. Currently, the County's COOP/COG plan is independent of the EOP. However, there is an increasing convergence of the two planning efforts. Many local governments in California are linking the two functions by creating a Continuity Unit in the EOC Operations Section – this allows the continuity function to access senior management and resources in order to carry out its mission. This also allows the emergency management organization to maximize County government capabilities and communicate effectively with internal staff and stakeholders.

Financial Management Annex. Not evaluated. However, development of this annex and supporting County policies, procedures and tools is strongly recommended.

Flood / Dam Failure Annex. The provided *Annex C, Appendix 1, Delta Flood Protection Plan* is dated July 2016 but the unsigned promulgation page is dated 2014 and the content appears very similar to the 2005 plan. The OES emergency telephone number listed is no longer in service. This appendix assigns primary responsibility for flood fight to OES which would appear to conflict with the understanding of Public Works.

The division of monitoring duties between OES and Public Works could be clarified here as well as a discussion of the flood forecast system. Clear definitions of 'monitor' versus 'warning' stages could be spelled out and used as content for the public information function. Lastly, action triggers based on forecast or actual river levels could be provided here as well as notification procedures for internal staff.

The Dam Failure Plan maintained by Public Works meets California OES standards.

Some clarification regarding the role of the Sheriff's Office in evacuations is needed. The Public Works Zone 9 Flood Control Emergency Operations Plan or Flood Control Maps could be incorporated in part or by reference.

Recommendations:

1. Develop a standardized format for all ESFs that follows CPG 101 v.2 format and proactively transition to alignment with the federal standard.
2. Clarify and update lines of authority and orders of succession through all planning documents consistently.
3. Ask the EOP executive steering committee to assess the potential for integrating or referencing EMS plans in the EOP.
4. Revise or develop content for those ESFs as identified above.

Four: Hazard Vulnerability Assessments (HVA) and Mitigation

Sections across planning documents should be expanded and consolidated. The planning documents do not contain consistent or detailed information related to County demographics data or risk/vulnerability assessments. Overall, the documents provide brief summaries, with some sections containing more detail than others. For example, the Basic Plan includes specific population data and a summary of numerous hazards but does not include critical infrastructure/key resources (CIKR) protection activities or time variables. The EOP Hazard-Specific Annexes provide better operational detail regarding emergencies that could have a higher impact. For example, additional detail on the County's demographics in areas such as those impacted by food insecurity could help forecast the potential demand for resources in Care and Shelter functions.

Currently, the mitigation overview provides a cursory summary of mitigation as a whole. The Basic Plan does not provide a summary of pertinent information from the mitigation plan, including the risk and capability assessments. Additionally, categories of the types of mitigation actions (such as property protection, infrastructure, and public outreach) are not summarized.

Multiple references are made to the THIRA and the capability assessment developed as part of the THIRA process; however, the capabilities are not summarized in the Basic Plan. Step 1 of the THIRA process (Identification of Key Facilities) has been completed. Integration of this data in the EOP would support Step Two of the THIRA process (Implementation). The Basic Plan does not contain a reference to the National Preparedness Goals and its Core Capabilities.

Recommendations:

Using existing planning products, consolidate all HVA information into one planning document. Excerpt key information for inclusion in the Basic Plan hazard summary and hazard-specific annexes. Consider referencing the County Hazard Mitigation for its detailed hazard analysis and planning products. When identifying and aggregating hazard vulnerability assessment information, include aspects such as:

1. Existing guidance for conducting a capabilities assessment:

    a. National Preparedness Goal and its Core Capabilities

2. A list (and map) of critical facilities and emergency management support facilities (or a reference to an appendix with this information) that provides valuable information about available resources for response and high-priority locations.

3. Demographic risk analysis to identify at-risk populations that will be disproportionately affected by an emergency, may need assistance with evacuation, or may have specific public messaging needs. See also recommendations and resources under *Analysis: Public Engagement, Education and Public Awareness.*

4. An overview of relevant risk assessment data from appropriate plans such as the THIRA and HMP.

5. Suggested resources include:

    a. American Fact Finder – http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml

    b. U.S. Health and Human Services (HHS) EmPower – http://www.phe.gov/empowermap/Pages/default.aspx

Five: Human Needs and Mass Care

The County relies heavily on the American Red Cross. The current EF-6 Mass Care Annex indicates a high reliance on the American Red Cross as the primary agency for providing mass care support. Such a reliance should be re-evaluated based on County and American Red Cross capabilities in light of the recent restructuring of the American Red Cross. The ultimate responsibility of mass care rests on the County. Plans should reflect alternate actions should the American Red Cross dedicate its dwindling resources outside of San Joaquin County or be unable to adequately support the County in this function.

In the County's current ESF-6 (Mass Care) related plans, there is almost no discussion of mass care missions outside of sheltering. However, public expectations for service have grown significantly in this area and now encompass major functions including mass feeding, community mental health, bulk goods distribution, reunification, "safe and well" information, disaster benefits, or addressing at-risk residents who may already be enrolled in County Human Services programs.

As the Operational Area incorporated cities may not be able to execute this function in a major emergency, the County should consider planning to directly provide such services and resources on behalf of these cities.

Recommendations:

1. Create a formal and detailed County-based mass care plan with transition procedures between organizations. See also the recommendations and resources listed under *Analysis: Legal Authorities and Updated Guidance.*

2. Review validity of formal MOUs and Memoranda of Agreement with service providers and mass care partners.

3. Assess the capability of County departments to support this function.

Six: Public Engagement, Education, and Public Awareness

Improve public engagement, education, and public awareness. The EOP – Basic Plan, Part 1, Section F(vi), "Collaboration with General Public and Watch Programs," outlines general activities associated with emergency and initial recovery activities. However, neither this section nor any other documents in the assessment outline a specific strategy for education events or continued outreach. Public education and outreach are important for reducing vulnerability and increasing overall preparedness. A multi-modal campaign that applies multiple methods of outreach, occurs throughout the year, and targets different local populations exerts the greatest potential impact. Developing such a program provides consistency with the "Whole Community" concept.

Recommendations:

1. Review and update public information and warning policies and procedures to ensure whole community inclusion practices:

   a. Clarify the language used for at-risk populations, people with disabilities, and people with access and functional needs to avoid confusion during development and distribution of public information.

   b. Detail how messaging will be developed and delivered in accessible and multiple formats.

   c. Detail how messaging is crafted to include visual, auditory, and intellectual disability considerations.

   d. Detail Section 508 compliance as well as Web Content Accessibility Guidelines (WCAG) 2.0 process for public web sites.

   e. Identify which languages are predominant within the County and will require translation for public messages.

   f. Identify messaging media (social media, print, or announcements) used to communicate with the public and how messages are developed and delivered in accessible formats.

   g. Identify training that Public Information Officer (PIO) and media relations staff receive related to accessible messaging, Section 508 compliance, and public information delivery.

   h. Identify training that personnel involved with crafting and disseminating public information, notifications, and warning to the public must have to ensure accessible communication to people with disabilities and others with access and functional needs.

   i. Include an information distribution process for agencies to use to provide information to distribute information to at-risk populations, how the information is disseminated, and what is done with the information.

   j. Establish MOUs/MOAs for translation services or identify resources for obtaining these services.

Seven: Recovery

Expand the focus on recovery. Recent events have repeatedly demonstrated that disaster recovery activities are often more challenging for local jurisdictions than response.

The current ESF-14 (Recovery) Annex consists largely of a group of function-specific appendices dating to 2008 and 2009. The Debris Management Appendix does not contain many of the key debris management policies that have gone into effect in recent years, which could jeopardize the County's eligibility for reimbursement of related costs under the FEMA Public Assistance (PA) program. Likewise, the Public Assistance Appendix is a brief summary of key considerations for participating in the program but would not serve as an effective operational guide to County staff. The annex does not reference or align with the National Recovery Framework or the federal Recovery Support Functions (RSFs).

The PA appendix references a San Joaquin Recovery Manual; this manual was not received nor reviewed as part of this assessment.

Recommendations:

1. Consider developing a separate Recovery Operations Plan to complement the EOP and provide enhanced guidance to County and Operational Area stakeholders. Utilize the RSFs and significantly expand the scope and planning detail for recovery functions including damage assessment, debris management, disaster assistance programs, financial recovery, community behavioral health, public health, and interim housing.

2. Consider incorporating a Recovery Roles and Responsibilities Matrix defining County department missions similar to the Emergency Functions Matrix in the EOP Basic Plan.

3. Consider aligning current recovery plans and ESF 14 with the federal RSFs. Referencing the federal RSFs, develop additional planning details to better align with potential state and federal assistance strategies. There are several California counties that have adopted this approach and developed a full suite of RSFs.