

TO: HONORABLE CITY COUNCIL



ATTN: POLICY AND SERVICES COMMITTEE

**FROM: CITY MANAGER DEPARTMENTS: CITY MANAGER'S OFFICE
FIRE DEPARTMENT
POLICE DEPARTMENT**

DATE: JUNE 26, 2007

CMR:284:07

**SUBJECT: CONSIDERATION OF DRAFT EMERGENCY OPERATIONS PLAN
AND RECOMMENDATION TO COUNCIL ON ADOPTION OF THE PLAN**

RECOMMENDATION

Staff recommends that the Policy & Services Committee review and recommend to the City Council for approval, with any suggested changes, the City's revised Emergency Operations Plan.

BACKGROUND

The City Council adopted the current Emergency Management Plan on January 11, 1999. The adoption of that plan brought the City into compliance with the SEMS model of emergency organization. The emergency plan is the official document that describes the City's responsibilities and the processes used to carry out emergency operations. Since 1999, the City has updated its plan to reflect responses to and planning for new types of local and national disasters that have occurred. In 2000, the Severe Winter Storm and Earthquake annexes were added to the plan. Following the 2001 terrorist attacks, the City completed a Terrorism Annex to the plan. The creation of the new National Response Plan (NRP) and the National Incident Management System (NIMS) federal emergency organization model has necessitated a more comprehensive update to the City's emergency plan. The federal government created guidelines for local government compliance with the NIMS requirements in December 2005. Since then, City staff have been working to update the emergency plan.

On May 8, the Policy & Services Committee reviewed a revised draft of the plan and received comments from members of the public. The Committee asked staff to return with a new draft of the plan that incorporated both the public and Council comments where appropriate. This report

provides an overview of the comments received and how staff has or will address these comments. The attached draft of the Emergency Operations Plan (Attachment A) incorporates edits as described below.

DISCUSSION

The following section provides staff's response to the key public and Council comments received at the May 8 Policy & Services Committee meeting. Copies of the original correspondence received in advance of the meeting are included as Attachment B.

Typographical corrections:

- Corrected the Palo Alto Neighborhoods (PAN) website address on page 79.
- Corrected the spelling of plume in Annex L, page 2.
- Added PAN to the list of community notification entities on page 49.

Material suggestions:

- 1) Media notification of State and Federal officials of problems in Palo Alto – There was a suggestion that the City's plan should include outreach efforts to media outlets outside of the Bay Area to ensure that Palo Alto receives attention and coverage. Staff agrees that this may be important in large regional disasters where media attention will focus on San Francisco and San Jose. To address this issue, staff has inserted the following paragraph on page 49 of the plan:

“Depending on the nature of the event, PIO staff will identify the extent of any media outreach. A list of media contacts is maintained in the EOC. In a major event, an outreach effort may expand beyond traditional media outlets in the Bay Area to include other public agencies outside the Bay Area, other public information professionals, the Red Cross and others. Each event will warrant a strategic analysis of the most appropriate and effective mechanisms for accomplishing the City's public information goals. These event-specific public information goals will become part of the incident action plan for the event.”

- 2) Comments regarding hazardous material incidents – The second document included in Attachment B contains several concerns and comments about the characterization of hazardous materials incidents and response. Staff has placed special emphasis on the edits to the Hazardous Materials Incidents Hazard Analysis section and Annex L of the Emergency Operations Plan. Attachment C to this report is a strike-through version of these two sections that identifies the edits made.

In reviewing the comments made related to hazardous materials response, it is important to explain the context of the Emergency Operations Plan. The EOP is a broad policy document that establishes the framework for City disaster response. Each operating department then develops its specific department operating plans and guidelines based on the context set by the EOP.

The Fire Department serves as the first responder for any hazardous materials incident. The department maintains a variety of local, state and federal documents that establish the response standards and guidelines for line personnel. The comment made regarding the identification of who has “responsibility for responding to what” is an appropriate question and has been clarified in the plan. The Fire Department is responsible for incident command, scene management, hazard control, containment and mitigation of hazardous materials incidents until the staff is relieved by another agency having jurisdiction over the event.

With hazardous materials response (or any type of emergency response), it is very challenging to create a laundry list of “typical” incidents and the anticipated response to these incidents. Each incident would need to be modeled individually depending on factors including: time of day, prevailing winds, type of release, etc. It is more reasonable to establish a general framework for emergency response that will allow adaptability to many different types of emergency situations. This is what the draft EOP attempts to accomplish.

Staff from the City Manager’s Office and Fire Department are currently working with the Barron Park neighborhood and CPI to develop a mutually agreeable notification and response plan for hazardous materials incidents in this neighborhood. Elements of this plan may be applicable to other hazardous materials situations and may be included in the EOP at a later date. The City will most likely not receive notification of any type of hazardous material release until several minutes after it has occurred. It may take up to another six minutes before any first responders arrive on scene. It is therefore incumbent on residents to have appropriate shelter in place equipment and training for these types of emergencies. City staff understand the significance of this issue but currently have limited, if any, enforcement mechanisms for requiring businesses to expand notification and response procedures. Facilitative problem solving involving both the affected businesses and the neighborhoods is the best approach for resolving these issues. The City can and will, as was suggested in the comments, identify ways to educate the public about appropriate shelter in place procedures.

In addition to working specifically with the Barron Park neighborhood, the City will continue to work with Palo Alto Neighborhoods (PAN) as it finalizes its Block Preparedness Coordinators (BPCs) concept. The BPCs will eventually serve as a critical link between the neighborhoods and the City in emergency response. These coordinators would maintain relevant information about their neighbors, thereby assisting first responders with identification of those residents with special needs (the handicapped, elderly and children) during a disaster. The relationship between the City and the BPCs is still under development and will be incorporated into the plan at a later date. The City does currently maintain a registry program for hearing impaired residents that can be accessed through the City’s website.

One additional comment made regarding hazardous materials facilities focused on requiring these facilities to have trained personnel on hand at all times with the ability to respond to an incident and who are authorized to notify the City immediately of any

releases. Both State law and local ordinance currently require immediate notification of local emergency response personnel in the event of a reportable release or threatened release of a hazardous material. These laws also require businesses to maintain procedures for mitigation of a release, evacuation plans and procedures for the site, and annual training for all employees on safety procedures in the event of a hazardous material release or threatened release.

Mapping and identification of hazardous materials facilities: At this point, the plan does not explicitly identify any of the City's hazardous materials facilities by name or location. It generally discusses the proximity of the Stanford Research Park and the Industrial Park east of US 101 to residential areas and other areas with sensitive populations. The City currently has approximately 500 businesses with annual hazardous materials permits. These businesses maintain varying quantities of hazardous materials with varying levels of toxicity. The challenge then becomes determining which of these facilities to identify specifically in the plan. First responders have access to detailed business information through a variety of mechanisms as they arrive on scene to any emergency. This information helps guide the emergency response approach taken by City staff. The maps currently included in the Emergency Operations Plan are public maps not typically utilized by first responders. As discussions continue regarding neighborhood notification and response plans, staff will commit to working with these residents to refine the content of these maps.

As mentioned at the May 8 Policy & Services Committee meeting, City staff will continue to work on several elements of the plan over the next six months. These elements include: work with PAN on neighborhood preparedness and incorporation of the Block Preparedness Coordinator concept into the City's response plans; identification and use of spontaneous volunteers; community notification procedures resulting from implementation of the new Community Alerting System and future discussions with the Barron Park neighborhood; and potential incorporation of recommendations stemming from the Red Ribbon Task Force's work on disaster preparedness.

RESOURCE IMPACT

Resource impacts associated with emergency preparedness and updating/maintaining the City's Emergency Operations Plan were identified in the May 8, 2007 Policy & Services Committee report on this topic.

POLICY IMPLICATIONS

This report is consistent with existing City policies and with the Council's designation of emergency preparedness/planning as a top priority for FY2007/08.

ENVIRONMENTAL REVIEW

This is not a project requiring environmental review under the California Environmental Quality Act (CEQA).

Attachment A: Draft City of Palo Alto Emergency Operations Plan – June 2007
Attachment B: Public comments received for May 8, 2007 Policy & Services Committee
Attachment C: Strike-through version of Annex L to draft Emergency Operations Plan

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