

Petersburg Borough Emergency Operations Plan (EOP) Review



Prepared: July 19, 2024

Final Report & Recommendations



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July 19, 2024

Petersburg Borough
Aaron Hankins, Fire/EMS Director
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RE: Petersburg EOP Review Final Report & Recommendations

As outlined in our Professional Services Agreement dated June 7, 2024, Katmai Preparedness Solutions, LLC “Katmai Solutions” has completed our review of the 2001 Petersburg Emergency Operations Plan.

The attached report outlines the general and specific update recommendations that are needed for the plan to be consistent with current guidance and best practices. This report is intended to provide you with a workplan necessary to fully update this plan and can be used to undertake this effort on your own or as a foundation to contract for EOP update services.

We appreciate your engagement with us to perform this EOP review, and the trust your borough has placed in us. As an Alaska based emergency management firm, we strive to maintain partnerships with local jurisdictions and organizations to improve community resilience and preparedness for disasters. Under separate cover, we have provided a proposal to complete the update to this plan as outlined, as well as to your Hazard Mitigation Plan. We appreciate your consideration and look forward to a long relationship with you and your staff.

For any questions regarding this report or proposal, please contact Abner Hoage, Managing Consultant by phone at 907-308-3697 or email abner.hoage@katmaisolutions.com.

Respectfully,

Dan Nelson
Katmai Preparedness Solutions, LLC.

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SECTION A –EXECUTIVE SUMMARY

INTRODUCTION

Katmai Preparedness Solutions, LLC conducted a thorough review of the Petersburg Disaster Response Plan, including Volume 1 – Administrative Overview and Volume 2 – Emergency Operations Guide, both dated June 2001. This review was complemented by references to the Petersburg Borough Multi-Hazard Mitigation Plan Update from March 2018. The recommendations provided are anchored in the Federal Emergency Management Agency's (FEMA) Comprehensive Preparedness Guide (CPG 101), Version 3, published in September 2021. The goal is to modernize and enhance the Petersburg Borough's emergency preparedness, response, and recovery capabilities.

GENERAL UPDATE RECOMMENDATIONS

The existing Emergency Operations Plan (EOP) for Petersburg is over twenty years old and requires significant revisions to remain effective during contemporary disaster response and recovery efforts. Since the formation of the Petersburg Borough on January 3, 2013, which led to the dissolution of the City of Petersburg, the plan needs to be updated to reflect this change. The update recommendations focus on aligning the plan with current methodologies and technologies, addressing new hazards such as cyberattacks and extremist behavior, and incorporating community lifelines for rapid stabilization post-disaster. A complete overhaul of the plan is advised to reflect contemporary threats, ensuring compliance with both state and federal guidelines, and to enable eligibility for various preparedness grants.

SPECIFIC RECOMMENDATIONS

INTRODUCTION AND AUTHORITIES

- Update authorities to include Presidential Policy Directive PPD-8 and the Robert T. Stafford Disaster Relief and Emergency Assistance Act.
- Ensure all authorities are verified and correctly referenced.
- Align the plan with recent code changes to reflect the formation of the Petersburg Borough and the dissolution of the City of Petersburg.

TERMINOLOGY AND CONSISTENCY

- Use consistent terminology, favoring "emergencies" or "disasters" instead of "disaster emergencies."
- Update emergency types terminology to "natural, human-caused, and technological."



- Extend preparedness messaging from 72 hours to seven days, consistent with Alaska's state guidance.

PLAN STRUCTURE AND COMPONENTS

- Adopt the community lifeline format for incident reporting.
- Define special populations to include persons with other access or functional needs.
- Update the plan review cycle to ensure annual reviews and specify responsible parties for training and exercises.
- Rename the Disaster Response Plan to the Emergency Operations Plan to encompass all phases of emergency management.

OPERATIONAL COMPONENTS

- Update incident activation policies to reflect current practices and FEMA guidelines.
- Include comprehensive lists of EHS/Hazmat sites and update utility and community services information.
- Incorporate sections on technological and cybersecurity threats.
- Rename "Incident Critique" to "After-Action Report/Improvement Plan."

PUBLIC INFORMATION AND COMMUNICATION

- Update public information management to include social media strategies and modern communication tools.
- Verify the existence and current status of warning systems such as sirens and public address systems.
- Ensure provisions for pets and livestock are comprehensive and compliant with the PETS Act.

COORDINATION AND COMPLIANCE

- Align the EOP content with the Comprehensive Preparedness Guide 101 to meet FEMA grant requirements.
- Maintain clear documentation and regular updates for MOUs with relevant organizations.
- Verify temporary morgue locations and other logistical considerations.

CONCLUSION

The recommendations provided by Katmai Solutions aim to modernize the Petersburg Borough's Emergency Operations Plan, ensuring it is robust, agile, and fully prepared to address the complexities of modern emergencies. Implementing these updates will enhance the Borough's



emergency management framework, improve operational effectiveness, and ensure alignment with both state and federal guidelines, ultimately increasing the safety and resilience of the Petersburg Borough community.



SECTION B –PLAN REVIEW & RECOMMENDATIONS

REVIEWED DOCUMENT AND BASIS FOR RECOMMENDATIONS

Katmai Solutions reviewed the Petersburg Disaster Response Plan Volume 1 – Administrative Overview and Volume 2 – Emergency Operations Guide, both dated June 2001 as provided. For additional context, we referenced the Petersburg Borough Multi-Hazard Mitigation Plan Update dated March 2018. Code references cited are based on the current version of borough code published on the Borough website during the review period of June – July 2024.

Our recommendations are grounded in the standards set forth in the Comprehensive Preparedness Guide, as published by the Federal Emergency Management Agency (FEMA) in September 2021, Version 3. These guidelines serve as the foundation for our assessment and subsequent advice detailed herein.

GENERAL UPDATE RECOMMENDATIONS

The Petersburg EOP requires timely updates to mirror the evolving nature of policy, procedures, and practical approaches towards preparing for, responding to, and recovering from disaster emergencies. Given the increasing prevalence of disasters both in Alaska and nationwide, maintaining and rigorously training on this plan is not merely crucial for effective response but also vital for securing cost recovery, preparedness grants, and further assistance across governmental levels.

The reviewed plan is over twenty years old and is in need of a major revision to provide for effective usage during a response and recovery to an incident. A large part of our update recommendations includes information that is commonly used in plans, as well as required by various guidance and standards. There is still a large amount of valuable information relevant to Petersburg in the plan, however it may be prudent to undertake a revision process as you would a brand-new plan. This is even more relevant based on procedures outlined in the EOP that are outdated and in conflict with the formation of the Borough/dissolution of the City in 2013 and code changes implemented during the COVID-19 pandemic.

The current plan does not address some current hazards and doesn't use current methodology. For example, there is no consideration given to emergencies involving cyberattack or extremist behavior. Additionally, the plan doesn't incorporate current planning guidance. We recommend the plan be completely revised to reflect current technologies and threats, the items contained in the CPG 101 guidance, and that hazards be updates and defined via the use of annexes to allow for quick reference by staff during a response. We also recommend incorporating the community lifelines concept.



Many of our recommendations require operational updates to Petersburg’s emergency procedures, including those used during response, recovery and preparedness. It is important to frame potential changes to the plan in that context. Many times, especially in smaller jurisdictions, best practices and other recommendations are not possible to achieve with the resources that are available. There is a balance that must be achieved between aspiring to reach a certain level within an emergency management program, and planning for what is reasonable and achievable.

SPECIFIC RECOMMENDATIONS

The following sections outline a series of specific recommendations grouped by focus area and designed to enhance the Emergency Operations Plan for Petersburg. Recommendations were developed based on detailed reviewer comments provided for reference in Section C of this report. These recommendations are the result of a comprehensive review process, focusing on areas that require updates for compliance, clarification of roles and responsibilities, and integration of contemporary best practices in emergency management. The goal is to ensure that Petersburg’s emergency management framework is robust, agile, and fully prepared to address the complexities of modern emergencies, from natural disasters to cyber incidents. Each recommendation is tailored to strengthen the plan’s foundation, improve operational effectiveness, and ensure alignment with both state and federal guidelines, ultimately enhancing the safety and resilience of the Petersburg community.

BASIC PLAN RECOMMENDATIONS

INTRODUCTION AND AUTHORITIES

Additions to Authorities:

- Include Presidential Policy Directive: PPD-8 National Preparedness.
- Reference PL 93-288 as the Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended.
- Verify and correct all listed authorities.
- Update AS 26.20 to “Homeland Security and Civil Defense”.
- Specify that Chapter 3.72 is in Borough Code, not city code.
- Verify the status of Ordinance 734.
- Clarify the scope of the new plan to reflect the formation of the Borough and dissolution of the City of Petersburg.



Terminology and Consistency:

- Update the list of emergency types with current terminology: “natural, human-caused, and technological” instead of “environmental, technological, and civil disaster”.
- Consider consistent preparedness messaging for self-sufficiency, potentially extending the advised period from 72 hours to seven days, as practiced in Alaska.
- Ensure that each department maintains an updated emergency plan or remove the reference.
- Use consistent terminology for emergencies, favoring “emergencies” or “disasters” instead of “disaster emergencies”.

Plan Details and Structure:

- Adopt the community lifeline format for reporting incident status.
- Define “special populations” to include “persons with other access or functional needs”.
- Change references to the mayor to use gender-neutral pronouns (they/them instead of he/she/him/her).
- Reconsider the definition of Incident Levels to align with FEMA’s incident typing.
- Include provisions for planned events in plan activation procedures.
- Suggest renaming the Disaster Response Plan to the Emergency Operations Plan, encompassing all emergency management phases.
- Clarify references to the Office of Emergency Management.
- Update the plan review cycle to ensure annual reviews and specify responsible parties for training and exercises.
- The plan should include all components in FEMA guidelines, specifically insuring that all requirements of the CPG 101 guidelines are included to ensure that future grant opportunities are available. This includes the introductory material such as purpose, scope, situation, and assumptions as well as concept of operations, organization and assignment of responsibilities, direction, control, coordination, information collection, communications and coordination, as well as administration and logistics information.

OPERATIONAL COMPONENTS

Plan Activation and Response:

- Update incident activation policies to reflect current practices and FEMA guidelines.
- Ensure plan activation procedures account for different types of incidents, including pre-emptive activations for predicted events.
- Include a comprehensive list of EHS/Hazmat sites, cross-referencing relevant databases.
- Verify and update utility and community services information.



Risk and Hazard Assessments:

- Include updated GIS/Satellite imagery for visual references.
- Reformat hazard and vulnerability assessments for better readability.
- Update hazard assessments to reflect current risks as outlined in the Hazard Mitigation Plan.
- Consider removing discharge maps from the public document to avoid misinterpretation during emergencies.

Technological and Cybersecurity:

- Add sections on technological and cybersecurity threats.
- Verify and update technological references, including emergency communications and notification systems.

Recovery and After-Action Reporting:

- The term “Incident Critique” should be renamed to “After-Action Report/Improvement Plan” throughout this section and the plan.
- Define “qualified personnel” in the context of today’s environment.
- Clarify references and equations used in evacuation planning, ensuring they are up-to-date and verified.
- Address citizens’ rights during evacuation and include steps to handle refusal to evacuate.

Public Information and Communication:

- Update public information management to include social media strategies and modern communication tools.
- Review and ensure accuracy in the communications section, including emergency alert systems and community warning systems.

Logistics and Support:

- Ensure provisions for pets and livestock during emergencies are comprehensive and compliant with the PETS Act.
- Verify and update agreements with partner organizations like the American Red Cross and Salvation Army for shelter management.

STATE AND LOCAL AUTHORITIES

Coordination and Compliance:

- Align the EOP content with the Comprehensive Preparedness Guide 101 as required for certain FEMA grants.



- Ensure all training and exercises comply with HSEEP doctrine.
- Maintain clear documentation and regular updates for MOUs with relevant organizations.
- Verify the existence and current status of temporary morgue locations.

PLAN MAINTENANCE AND REVIEW

Continuous Improvement:

- Establish a clear review cycle and ensure amendments are made following significant incidents or exercises.
- Incorporate feedback from annual interagency exercises and critiques into the plan.
- Maintain an accurate distribution list for all stakeholders and ensure timely updates.



SECTION C – DETAILED REVIEWER COMMENTS

This section contains a detailed list of reviewer comments by page number. These comments formed the basis for and in some cases expand on the recommendations in Section B of this report.

****NOTE:** The page numbers referenced in the following tables indicate the PDF Document page numbers and not the plan page numbers. During editing of the original document page numbers may shift.

BASIC PLAN REVIEW COMMENTS

Page #	Comment/Recommendation
V1, 6	Add Presidential Policy Directive: PPD-8, National Preparedness into authorities
V1, 6	Add reference to PL 93-288: Should be referred to as the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended
V1, 6	Authorities: All authorities need to be verified
V1, 6	AS 26.20 correct to “Homeland Security and Civil Defense”
V1, 6	Clarify Ch 3.72 is in Borough Code (not city)
V1, 6	Verify if Ordinance 734 is still in affect
V1, 6	Verify scope: Change references throughout to refer to Borough rather than City.
V1, 7	1.3 Suggest the list of emergency types that will be prepared for list current terminology. Instead of “environmental, technological, and civil disaster” list “natural, human-caused, and technological”
V1, 7	Consider messaging about citizens and self-sufficiency. Current text refers to “up to 72 hours”. FEMA utilizes the 72 hour metric in some messaging. The state of Alaska preparedness messaging encourages seven days of



	preparedness. Consider the situation with outside resources and supplies to Petersburg when advising a number for the plan, which should be consistent with any messaging to the community.
V1, 7	Does each department maintain an emergency plan? If not, reference should be removed. If so, consider internal policies of periodic review and maintenance of such plans.
n/a	Use of “disaster emergencies” clutters the flow of the documents. Consider using only emergencies or disasters.
V1, 7	Consider removing the details of the incident status report in the section 1.3.1. We recommend adopting the community lifeline format of reporting.
V1, 7	Special Populations vs Vulnerable Populations. Consider adding to the definition of special populations “Persons with other access or functional needs”
V1, 12	Change mayor references from “he” to “they”
V1, 8	Incident Levels: Review internal policy regarding incident activation. It’s generally not necessary to define Level I without plan activation, it may be advisable to define a lower level response (local resources) and a response requiring outside resources that most certainly will translate into a declaration, then a response at a full emergency level that might involve FEMA assets such as a region wide earthquake. It may be advisable to consider reversing the order to correspond with FEMA incident typing, where type 1 is the highest level of complexity and type 5 is the lowest.
V1, 10	Plan activation procedures should include provisions for planned events or those that do not start with an on-scene Incident Commander. Example for a predicted weather pattern or community event. PKEMRA revisions to the Stafford Act recognize declaration and activation in advance of the actual event.
V1, 16	Verify ANNUAL review and amending



V1, 10	Suggest that the Disaster Response Plan title be amended to the Emergency Operations Plan and include all phases of emergency management consistent with CPG 101
V1, 12	References to the Office of Emergency Management should be clarified based on 3.72.020 that this falls under the borough manager's office.
V1, 16	Plan indicates review annually, if this is not being done, update maintenance cycle. Section 2.4 indicates SERC review is required for changes, but SERC is not referenced in any other location in Volume 1 of the plan. Volume 2 has a phone number, but no citation of this requirement or what SERC is.
V1, 16	2.5 should update verbiage to clarify who is responsible for training and exercise (presumably borough manager office) and should cite that such exercise will be compliant with HSEEP doctrine.
V1, 18	Government: Correct language to reflect the 2013 change from City to Home Rule Borough?
V1, 18	EHS/Hazmat sites should be updated and should be cross-referenced with CRNA/Tier II reporting database
V1, 19	Utility and community services likely need updated.
Section 3	Include GIS/Satellite imagery in addition to current Figures
V1, 24	Reformat Table so risk analysis lines up with the appropriate bullet. It is lost in vulnerability analysis.



V1, 25	The Hazard Assessment should be updated and also re-formatted to improve readability. Hazard Assessment shown in the EOP should generally mirror those hazards outlined in the Hazard Mitigation Plan.
V1, 28	Consider revisions based on state sponsored terrorism, DVE, and current politico-military climate.
V1, 32	Discharge maps should be updated if the community continued to have them in the plan. It may be advisable to hold such data in another document separate from the EOP, that can be accessed by the emergency response organization. Environmental conditions and other variables can change projections, maps that are publicly available like this could be mis-interpreted during an actual event.
V1, 38	Technological/cybersecurity should be added to this section.
V1, Table 4-5	Format the two pieces of hazmat facilities in the same manner
V1, 44	Format HVA the same way throughout.
V2, ToC	Check formatting for readability
V2, 26	Consider revising Section name/Hazard name to capture the risks of today, update throughout section.
V2	Recovery Checklists identify “Incident critique”. Should be After-Action Report/Improvement Plan throughout.



V2, 76	What consists of the “Package”
V2, 86	Does the Qualified Personnel Roster adequately reflect today’s environment? Excluding Legal Officer, what are the requirements to be “Qualified”?
V2, 111	Use of special populations vs vulnerable populations, access needs, other terminology.
V2, 133	Reference for evacuation equation? If self-created, annotate as such.
V2, 134	Address citizen’s right to refusal regarding evacuation and steps to take.
V2, 145	Is there an MOU with primacy clause in effect with Salvation Army?
V2, App C	Have these been verified in the past 5 years?
V2, 156, Sec 9.2.1	Spelling of NIMS vs NIIMS
V2, 157, Sec 9.2.5-9.2.6	Is there an MOU in effect?



V2, 163	Are there identified Temporary Morgue Locations established? If so, identify them in this section.
V2, 168, Sec 10.7.2	Consider United Way, crisis cleanup, or other 3-4 digit numbers for assistance requests. (i.e. 2-1-1)
V2, 169, Sec 10.7.3	Include a Helpline Email in additional to fax and phone.
V2, 176	Include a graphic of EOC layout(s) during different activation levels
V2, Sec 12	Remove individual names from call rosters, and identify position held. Allows for easier updates by not having to chase down individuals.
V2, Sec 13	Blank
V2, 74	2.2 Plan Activation: States City Manager is the chief executive, per 3.12.010 should this be Borough Manager. Needs updated to reflect 2013 formation of Borough which dissolved the previous existing City.
V2, 75	Level III Activation states that this is a full activation and “this will include” the entire team. This is in contrast to NIMS doctrine that provide ICS to be modular. Recommend the plan state that all positions may be filled, but ICS allows only needed positions to be filled at the discretion of the IC.
V2, 76	Verify the dispatcher has an SOP of notifications require of an activation.



V2, 76	Update references to pagers and other technology.
V2, 76	Borough emergency ordinance must be cited. Recommend potential powers that might be incorporated by cited at least by reference (3.72.060?)
V2, 77	C&G staff responsibilities table in a declaration: This seems to read at first glance that command presents all information to city manager. While this would make sense in an ICS context, declarations frequently require language drafted by management, legal, and/or clerk. Suggest clarifying those roles in the process so there is a clear and well defined process. Also suggest template of declaration be included in this plan.
V2, 77	ADES update to DHS&EM
V2, 77	Definition of disaster is outdated and inaccurate, update and/or cite code section
V2, 77	The plan compels situation reports to be published and updated at 12 hour intervals. Suggest updating to “as determined by Incident Commander” to provide flexibility.
V2, 78	Recommend situation reporting use Community Lifeline concept.
V2, 79	FEMA Form 90-91 is FEMA 9-0-91, Project Worksheet
V2, 79	2.8.1 still has valid information, but consider renaming to a Disaster Assistance Center. The role of voluntary agencies should be emphasized. Some services, such as individual and family grants, are based on the disaster and only available in certain conditions. Language update required.



V2, 85	Suggest references to IEMS be removed so as not to be confused with NIMS/ICS concepts.
V2, 85	RMAC is cited in org chart but not defined until much later in the plan. Verify this entity still exists and is relevant to the EOP and define.
V2, 86	3.2.2: The terminology of all ages “with responsibility for an incident” should be clarified that this means legal jurisdictional authority vested in local, state, or federal law or regulation.
V2, 89	The public information organization is a good method to manage information, but it raises information if the organization can be staffed at the necessary level. The org chart and procedure should be reviewed for relevance and update necessary technologies. For instance, Emergency Broadcast System is depreciated, and PIO’s now may be involved in field operations beyond a shelter to assistance centers, reception centers, and more.
V2, 90	Plan needs updated to social media resources, information strategy methodology, and potential JIS functions.
V2, 97	5.1/5.2/5.3: Review communications description to ensure accuracy. Net information is based on ICS curriculum that is one way to organize radio information, but may not be applicable to a jurisdiction the size of Petersburg. In addition, other methodologies such as phone, runners, digital should be addressed in the plan.
V2, 100	Petersburg should have a standalone EAS plan; the state EAS plan would not apply for local emergencies. Verify plan and ensure communications section is consistent with the most updated version.
V2, 100	Verify Petersburg ARES is still active and information accurate.
V2, 101	Verify federal radio caches exist and dispatch capabilities are still valid and haven’t been consolidated



V2, 111	Verify that Sirens and public address systems still exist; update any other relevant methods such as community warning systems for cell phones, WEA, etc
V2, 112	Verify sirens still use the stated warning formats and operating procedures.
V2, 132	Per State Statute, registered fire departments can also order an evacuation.
V2, 134	Update facilities/special considerations table.
V2, 137	Provisions for pets are not addressed. The Stafford Act, amended with the PETS act of 2006, require local plans to address pets.
V2, 146	Verify American Red Cross still has valid agreements for shelter management and has the capability to provide. In many cases Red Cross response is dependent on volunteers. The plan should address sheltering when the Red Cross is not available.
V2, 146	Recommend Mass Care include descriptions/procedures for assistance or reception centers as well as sheltering.
V2, 146	8.1.4 The pet section needs to be amended with a more comprehensive plan for the accommodate of pets and livestock.
V2, 166	Add environmental considerations to 10.2



<p>No Page</p>	<p>Consider incorporating Community Lifeline into EOP. The community lifelines construct is an objectives-based approach to incident response that prioritizes the rapid stabilization of key functions after a disaster. A lifeline enables the continuous operation of critical government and business functions and is essential to human health and safety or economic security—the most fundamental services in the community that, when stabilized, enable all other aspects of society to function.</p> <p>When lifelines are disrupted during an incident, decisive intervention is required to stabilize them. Consequently, accounting for lifelines in the planning process can inform representation on the planning team and the content of EOPs. Although developed to support response planning and operations, community lifelines are relevant across the entire preparedness cycle: protecting lifelines, preventing, and mitigating potential impacts to them, and building back stronger during recovery.</p>
<p>No Page</p>	<p>EOP content is recommended to be aligned with the guidance published in the Comprehensive Preparedness Guide 101 published by FEMA (updated 2024). If Petersburg is a recipient of certain DHS grants, this guidance may be required.</p>

