



**San Francisco Bay Area
Regional Catastrophic Planning Team**

November 20, 2015

Nate Ortiz
Emergency Services Coordinator
California Governor's Office of Emergency Services
3650 Schriever Avenue
Mather, California 95655

Dear Mr. Ortiz,

On behalf of the San Francisco Bay Area Regional Catastrophic Planning Team (RCPT) Catastrophic Planning Integration Sub-Committee, thank you for the opportunity to review and provide comments on the draft Bay Area Catastrophic Earthquake Plan (the Plan) developed jointly between the Federal Emergency Management Agency and California Office of Emergency Services. As you know, for years, the Bay Area has planned, trained, and exercised for a catastrophic earthquake incident. The Committee has reviewed the Plan and submits with this letter our consolidated comments and recommendations for improving the Concepts of Operations in a manner that better works with Bay Area established best practices and proven successful response operations.

Our Committee asks that that you please carefully consider the attached comment form containing our requested revisions and provide a response as to how each will be addressed as part of the final plan development. Having previously submitted comments and participated in the Plan development interview and workshops, the Committee seeks to ensure that their views and input are fully considered and reflected in the final plan.

There are three key areas of focus that the Committee would like to highlight:

1. Scenario Impact Analysis

The Committee would like to better understand the rationale and process used to determine the forecasted impacts for the Plan's earthquake scenario. The RCPT is concerned the scenario impact analyses used here do not match those developed as part of the multi-year FEMA Regional Catastrophic Planning Grant Program (RCPGP) catastrophic earthquake plans. Cal OES has accepted the RCPGP HAZUS scenario as the Bay Area regional hazard assessment and this is reflected in the Bay Area region's THIRA and regional coordination plans. While we collectively understand the model and variables it can produce, the more qualitative approach taken in the Plan gives the RCPT some concern that we are underestimating the potential impacts of a catastrophic earthquake and are, therefore, under preparing

for such an event. Although in receipt of the brief response to this issue dated June 22nd, the RCPT would like to request a copy of the planning factors used in the current draft of the Plan. The Committee seeks to examine the inputs to the model so that its members can determine which numbers are appropriate for our future Bay Area planning initiatives.

2. Encompassed Jurisdictions

A fundamental issue remains the definition of the area encompassed by this plan. The three most southern Operational Areas of Monterey, San Benito and Santa Cruz appear to be incorporated in several areas of the Plan. However, it remains unclear if they have been adequately integrated into the response and recovery processes outlined. These three counties are part of the 12-county Bay Area footprint as defined in all prior regional coordination plans including the RCPGP regional catastrophic earthquake plans. These counties serve a key support response and recovery component for the Bay Area. Thus, for these counties not to be fully integrated, it introduces inconsistencies and potential confusion to our previous and on-going regional / local planning efforts and response practices.

3. Geographic Operations (Geo Ops)

The Geo Ops concept is described in only the briefest of terms and does not provide sufficient detail to enable local jurisdictions to understand how they will engage with state and federal operational systems. Although the entire Plan seems to hinge on this approach, there is no familiarity or experience with this concept in California. The only reference or guidance appears to be a federal DHS inter-agency CONOPS document and thus, it is very unclear as to how this concept integrates with California's Standardized Emergency Management System (SEMS). The Committee respectfully requests a written explanation of how the Geo Ops concept will function in the context of SEMS as well as detail on coordination factors including what/who is on a Geo Ops team, team activation thresholds/triggers, team member qualifications, communication procedures, authorities, responsibilities and how local governments are expected to engage, coordinate with and support the teams.

Thank you again for the opportunity to participate in this process. We appreciate your consideration and response to our enclosed comments. The Committee believes that the ability of local governments to integrate with state and federal efforts will be fundamental to success in a catastrophic incident response.

Sincerely,



Corinne Bartshire

Chair

cc:

Bay Area UASI Approval Authority

UASI Region Operational Area & Core City Emergency Managers

RCPT Sub-Committee members