

Certified Public Manager Project

Process Improvement for

South Carolina Department of Natural Resources

Emergency Management Plan



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Department of Natural Resources

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The South Carolina Department of Natural Resources (DNR) is the agency tasked with managing and preserving the State's natural wealth, including land, water and wildlife resources. The Department's vision is "to be a trusted and respected leader in natural resources protection and management, by consistently making wise and balanced decisions for the benefit of the state's natural resources and its people." The Department consists of five Divisions; Land, Water and Conservation; Marine Resources; Wildlife and Freshwater Fisheries; Law Enforcement, and Outreach and Support Services. In order to continue to fulfill its mission in the advent of a natural disaster or other emergency, the DNR has prepared an Emergency Management Plan to outline its response functions. While some coordination is centrally maintained within the Plan, each Division has its own procedures and guidelines to follow should the situation warrant implementation of the Plan.

With the many response inadequacies that have come to light during the recent catastrophic hurricanes along the Gulf Coast of the US, DNR management felt that the Department's current plan may also prove inadequate for similar major events here. It has, therefore, become necessary to re-evaluate each Division's operational plans. The following discussion reviews the Emergency Management Plans for two DNR Divisions; Land, Water and Conservation and Marine Resources. Recommendations for improving the overall Department Plan are also made.

The review process began by examining the emergency management plans of Natural Resource agencies of those states most recently impacted by major storms; Louisiana, Mississippi and Florida. These were compared to SCDNR's Emergency Management Plan to look for similarities and discrepancies. Interviews with resource managers within those states were then carried out to get a first-hand assessment of procedures which they felt were affective and which needed improvement. Any additional documentation from those states, such as 'lessons learned' was also examined. Finally, the Federal Emergency Management Agency's (FEMA) publication "Emergency Management Guide for Business and Industry" was used to assess the completeness of DNR's plan.

Land Water & Conservation Emergency Management Plan Review

The South Carolina Division of Land, Water and Conservation Division (LWCD) is a support agency to the Emergency Management Division and the DNR Emergency Operations Center in the event of a disaster. The Division supports five Emergency Support functions in the States Emergency Response Plan. Accordingly, each year the Division is requested by the Agency Director, to update the plan.

Since Hurricane Katrina occurred in 2005, LWCD management thought it would be important to assess if lessons learned from similar programs in Mississippi would help us better prepare. Mississippi was selected over Louisiana since Mississippi is located within the same FEMA Region as South Carolina.

FEMA's publication "Emergency Management Guide for Business and Industry (FEMA 141) offers a suggested list of planning components. This document was used as one measure of the Land, Water and Conservation Division (LWCD) Plan. The LWCD plan has a purpose, organization and control, responsibilities and functions, as well as other components. Based on the comparison to FEMA 141 the following possible inadequacies were noted.

- While the key headers are addressed the material contained lacks sufficient detail and appears to be limited to flooding, hurricanes and drought.
- The plan designates individuals to man the DNE EOC but does not provide a clear definition of their authority and duties.
- The does not provide details that support our role with the State Emergency Response plan and LWCD requirements for support of assigned Emergency Support Functions (ESFs).
- There is no plan to exercise and provide training concerning the plan.

The DNR Emergency plan § V. paragraph C, Responsibilities of the Division Deputy Directors was the second measure utilized. Using this measure additional inadequacies were revealed.

- The LWCD pan does not designate a Division Emergency Coordinator and alternate that are responsible for plan maintenance;
- LWCD does not provide training to key personnel assigned to execute the plan;
- The LWCD does not document procedures for the emergency procurement of supplies and equipment.

Interviews with staff revealed that although they have a role in supporting the State Emergency Plan they do not have a copy of the State Emergency Management Plan. When questioned about their role in the DNR EOC most respondents indicated that they are not clear about there roles, responsibilities and authorities.

The Mississippi Floodplain Management program is located within the State Office of Emergency Management. Accordingly, they felt they had adequate plans for the disaster. The Mississippi State coordinator put out a call for floodplain management assistance from other states through the interstate compact agreement. The terms for responding to assistance requests from other states is outlined in Title 25 Chapter 9 Article 1 of the SC Code of Laws which provides that the Governor may participate in such a mutual aide compact and the terms of that compact. While the Flood Mitigation Program was unable to participate this time DNR Law Enforcement did. Law Enforcement originally responded outside the compact which is concerned with the Emergency Management Division.

After a careful review it is suggested that the LWCD plan be amended to include the following recommendations:

- Further expand upon the role, responsibilities and authority of those assigned to the DNR EOC;
- Appoint an emergency plan coordinator and alternate;
- Establish procedures within LWCD for emergency procurement along with an alternate point of contact;

- Conduct an annual meeting for all of those individuals with assignments in the plan;
- Provide a copy of the State Emergency Response Plan for all individuals with ESF responsibilities and conduct an annual meeting;
- Work with DNR staff to establish procedures for supporting the interstate compact agreement and,
- Expand the scope plan to include all natural hazards and fire emergencies.

MARINE RESOURCES DIVISION

The Marine Resources Division (MRD) of SCDNR, located in Charleston, is particularly susceptible to damage from tropical storms due to its location on the coast of South Carolina. Any tropical storm activity on the east coast of the US, even without direct landfall, has the potential to impact MRD in some manner. This has been demonstrated on an almost annual basis, often multiple times during a given hurricane season.

The MRD sustained major damage in 1989 when Hurricane Hugo, a category 4 storm, made landfall near Charleston and since that time has attempted to better prepare itself for future storms. The **‘Marine Resources Division Hurricane Preparedness and Recovery Plan’** is the Division’s attempt to foresee all probable areas of storm damage, including property, equipment, vessels, vehicles, and data. The document is available to all MRD employees and is updated annually. The plan is very detailed and specific in outlining the various precautions to be taken in the advent of an approaching storm;

however, its thoroughness may present a problem to its actual execution. Because the document addresses so much material, it is rather lengthy and cumbersome. Although all MRD employees have access to the plan, very few have actually read the entire document. An email survey sent to MRD personnel indicated that less than 10% of Marine Division employees have read the Hurricane Preparedness and Recovery Plan. Lack of foreknowledge concerning the steps to be taken in event of an approaching storm is a potential problem that has not been addressed.

Some of the storm preparation details outlined in the Plan, such as backing up files or moving sensitive equipment, can be done without prior planning. However, many of the recommendations require supplies or services that may be highly in demand or unavailable completely during last-minute preparations. For example, the Plan states that all boats and trailers be secured with hurricane tie-down straps yet does not state whether or not the Division carries these supplies. Preparations include, among other items:

- Ensure generators and chain saws are fully serviced and checked
- Procure new chain saws, if necessary
- Procure oil/lubrication for saws, motors

While these are certainly sensible precautions, it is unlikely that there will be time to have equipment serviced within the few days notice generally given for a hurricane warning and many storm preparation supplies are extremely difficult to come by when an entire coastal community is also preparing for the approaching storm. It is areas such as these where lack of prior awareness of the Preparedness Plan would cause the most problems.

Another problem not addressed in the Preparedness Plan is how to pay for supplies and services in a timely manner, particularly after a major storm when emergency supplies are in demand. The State procurement system is often not extremely efficient in rendering payment for goods and materials. While the issuance of Procurement Cards (credit cards) has helped the process considerably and can be highly beneficial before a storm hits, after a major event they may be less useful. After Hurricane Hugo many businesses were physically damaged and, without electricity, credit card readers were unavailable. Many emergency supplies were sold from the backs of trucks on a cash only basis, first come, first served. There was no paperwork or receipts and sellers were certainly not concerned about being on the State-approved vendors list. The Plan does not discuss the possibility of an emergency cash reserve and, in fact, there is very little discussion of supply concerns post-impact other than “assess the damage to MRD facilities” and “restore access to MRD facilities.”

A survey of other coastal state’s Natural Resources Departments more recently hit by hurricanes indicated that they are addressing or are at least aware of some of these concerns. For example, since Hurricane Katrina the Mississippi Department of Marine Resources (Appendix I) has established a 1000 gallon emergency fuel tank to ensure the usability of all boats and vehicles after a major storm. The tank is filled at the beginning of hurricane season and a stabilizing chemical added to prevent fuel spoilage during storage. The Louisiana Hurricane Procedures (Appendix II) require that all boats and trucks be kept completely fueled at all times and rope, chain, and other materials used in securing loose gear be kept in adequate supply. The SCMRD Plan does not advocate a

state of readiness for the Division but merely addresses how to become ready if necessary.

Another major advantage of the Mississippi and Louisiana plans is their brevity. Keeping emergency procedures short and to the point ensures that all personnel can more easily become familiar with them.

Natural Resource agencies in Florida have numerous evacuation and contingency plans; however, after examining the most recent hurricanes in their state they have compiled a list of "Lessons Learned" in preparing for future storms (Appendix III). While it remains to be seen whether or not they follow through on these lessons, the list does provide many excellent recommendations for other coastal states to consider.

Recommendations to improve SCMRD Hurricane Preparedness and Recovery Plan

In light of the potential problems caused by lack of readiness, it is apparent that simply having an emergency plan is not sufficient. That plan must address all contingencies yet be straight-forward enough to be understood by all and simple enough to be readily carried out. With that in mind, the following recommendations are given to improve the Marine Resources Hurricane Preparedness and Recovery Plan.

- Simplify or edit current Plan to eliminate needless text and explanations.
- Require all employees to read and become familiar with Plan.

- Stage drills prior to hurricane season to practice implementation of the Plan.
- Develop petty cash reserves to purchase emergency supplies.
- Appoint a FEMA liaison to become familiar with federal disaster relief procedures.
- Log all preparation costs and procedures and recovery costs and procedures in order to qualify for FEMA disaster aid and mitigation grants.

Overall SCDNR Emergency Management Plan Recommendations:

- Expand the purpose of the plan to all hazards, including fire and clearly define the types of hazards or emergencies the plan covers.
- The Interstate Compact should be mentioned in the DNR State plan along with procedures that should be followed by staff for implementation.
- Standardize and explain IT procedures rather than each division establishing their own.
- Standardize and explain emergency procurement policies.
- Reference the overtime policies (701.02 XVIII. Time worked in cases of Natural Disasters).
- Conduct a facility survey to determine if DNR facilities are located in the floodplain
- Determine critical facilities.
- Define critical and essential agency functions and staff for continuity of government.

- Develop an agency-wide recovery plan.
- Post the DNR Emergency Plan on the internal POP server so that all DNR employees may access the plan.

Implementation Plan:

- Present immediate supervisors and Deputy Directors with recommendations for improvement of Division Plans by 30 April 2007.
- Request that they present the Department recommendations at the next Deputy Director's meeting.
- Solicit comments on recommendations.
- Implement changes, publish and distribute by 30 June 2007.

Once the updated plan has been distributed to all DNR employees, a new statement should be added to the DNR policy manual regarding receipt of the Plan. Since all policy changes must be signed by employees, it will become necessary for everyone to acknowledge having received and read the new Emergency Preparedness Plan.

Thereafter, all preparedness drills (as required in the new plan) will be documented by section managers for review by Deputy Directors. This will allow fine-tuning of the various Division plans which will be incorporated into yearly Plan updates.

APPENDIX I

Mississippi Department of Marine Resources

Tropical Storm and Hurricane

Contingency Plan



DEPARTMENT OF MARINE RESOURCES
TROPICAL STORM AND HURRICANE
CONTINGENCY PLAN

(Revision 1- July 2006)

Mississippi Department of Marine Resources
1141 Bayview Avenue
Biloxi, MS 39530
228-374-5000

CONTINGENCY PLAN FOR IMPENDING TROPICAL STORMS AND HURRICANES

DEFINITIONS

Tropical Depression: A tropical cyclone in which the maximum sustained surface wind is not greater than 38 mph.

Tropical Storm: A tropical cyclone in which the maximum sustained winds are greater than or equal to 39 mph but less than 74 mph.

Category One Hurricane: Has winds between 74 and 95 mph and a storm surge of 4-5 feet and results in damage to shrubbery, trees and unanchored mobile homes.

Category Two Hurricane: Has winds between 96 and 110 mph and a storm surge of 6-8 feet and results in considerable damage to trees, windows, roofs, etc.

Category Three Hurricane: Has winds between 111 and 130 mph and a storm surge of 9-12 feet and results in considerable damage to large trees, most signs, homes and mobile homes.

Category Four Hurricane: Has winds between 131- and 155 mph and a storm surge of 13-18 feet and results in complete failure of most roofs, the destruction of mobile homes and extensive window and door damage.

Category Five Hurricane: Has winds greater than 155 mph and a storm surge of 18 or more feet and results in complete failure of most roofs and the destruction of small homes and mobile homes.

Hurricane/Tropical Storm Watch: A Hurricane/ Tropical Storm may pose a threat to the coast within 36 hours.

Hurricane/Tropical Storm Warning: A Hurricane/Tropical Storm may pose a threat to the coast within 24 hours.

Prep Team: Consist of the Emergency Response Officer (ERO) and one representative from each office.

I. PREPARATORY
CONDITION 4

The Emergency Response Officer (ERO) will monitor the development of tropical systems that are located near or within the Gulf of Mexico and keep the Executive Director posted on their movements. Once a storm enters the Gulf, the DMR Emergency Prep Team shall meet and begin to make plans for relocation and proper securing of all DMR assets. A pre-designated post storm meeting site shall be agreed upon so that the recovery phase can be set into motion without delay. All DMR vehicles should be filled with fuel in preparation for the storm. Additionally, the 1000 gallon emergency fuel tank shall be checked to make sure that it is full. The 1000 gallon tank shall be filled and fuel stabilizing chemical shall be added at the beginning of hurricane season in June of each year. At the end of hurricane season in November the fuel in the tank shall be utilized in DMR boats and vehicles to prevent fuel spoilage due to prolonged storage.

II. HURRICANE/TROPICAL STORM WATCH
CONDITION THREE

A. If a Watch is issued during working hours:

The ERO will monitor the progress of the storm. When necessary, the Executive Director, after coordination with the ERO, will order hurricane preparations to begin. Preparations should begin early enough so that they may be completed before a Warning is issued:

1. Each employee shall secure his or her office and assist in the securing of the shared work areas and the offices of the Prep Team, if the team is engaged in other storm preparations. All data on computer hard drives shall be backed up on discs and the discs shall be removed to a place of safe keeping separate from the computer drive units. Computers and other electronic equipment shall be covered with plastic tarps and secured in an internal office. Additionally, if a category 2 hurricane or greater is anticipated, the computers must be moved to internal offices on an upper floor of our facility;
2. If deemed necessary by the Executive Director and the ERO, the Prep Team shall begin securing materials within the compound, filling ice chests with ice, etc. Other employees as needed may be recruited to help with this job;
3. Each Office shall be responsible for moving their vehicles to a pre-designated place of safety in an open field or other safe parking area. Boats shall be moved to a safe harbor of refuge and properly moored with adequate anchors and doubled up lines. Trailerized boats shall

be moved to a place of safe refuge. All utility trailers, 4-wheelers, outboard motors, etc. will be removed from the DMR compound. No DMR vehicle, utility trailer, outboard motor, or boat, shall be left on the Bolton Building property if a storm of hurricane strength is anticipated. Non-assigned cars shall be moved by employees designated by the Executive Director's Office;

4. Pertinent documents and records shall be placed in plastic bags and stored in the safe. Back-up copies should be made when possible and stored in a different location in case the building sustains major damages; and
5. If the oyster season is open, the check-in stations and reefs will be closed and evacuated at the time the Executive Director orders hurricane preparations to begin. Oyster season will remain closed until the threat of the tropical system passes and the Executive Director determines that the environmental and physical conditions of the reefs warrant their reopening. (Acceptable fecal counts, minimal physical damage, etc.)

B. If a watch is issued after normal working hours or on a weekend:

1. The ERO shall advise the DMR Executive Director and all DMR Department Heads of the warning. Department Heads shall institute an emergency recall of personnel so that immediate action may be taken as necessary. The DMR Prep Team shall also be notified by the ERO so that emergency preparations can be set into motion.

III. HURRICANE/TROPICAL STORM WARNING CONDITION TWO

ALL PREPARATION SHOULD BE FINALIZED IMMEDIATELY

Once Mississippi has been placed under a Storm Warning and the office has been secured, the Executive Director upon permission of the Governor and in accordance with the State Employee's Handbook will place all employees on Administrative Leave until all danger has passed. The Executive Director, Deputy Director, Chief of Staff, ERO, and all Office Directors should take cell phones, State radios, complete set of building keys, and a State vehicle home in order to be able to communicate and travel easier after the storm. Any

remaining radios shall be distributed among key staff personnel. Radios shall be monitored during the passage of the storm and as much as practicable, routine radio checks shall be made at the top of each hour.

IV. POST-HURRICANE RECOVERY PROCEDURES

As soon as possible after the storm, Office Directors shall attempt to contact their employees (and vice versa) in order to see if they need help.

- A. If no major damage results from the storm in the local area:
 - 1. Employees will return to work during the next regular working shift after the storm warning have been lifted; and
 - 2. Upon returning to work, the entire staff will join in restoring the office to its pre-storm configuration (returning the vehicles to the compound, setting up the computers, etc.)

- B. In the event that major damages have occurred in the local area:
 - 1. Employees shall attempt to contact their Office Director and/or the office as soon as possible.
 - 2. Employees should attempt to gather at a pre-designated meeting Place, as soon as possible after the storm. Those employees needing help should identify their immediate needs so that more fortunate employees can help out if possible. Those employees living closest to the office should try to visit the office as soon as possible after the passing of the storm to assess the damages.
 - 3. Employees who are able to return to work will:
 - a. First secure the premises and, with the permission of their Office Director, offer assistance to the other employees;
 - b. Enter the building only after getting the go-ahead by the Executive Director or his designee;
 - c. Upon order of the Executive Director, contribute to the overall Recovery process of the local community by cooperating with the Office of Homeland Security, Federal Emergency Management Agency, Mississippi Emergency Management Agency and/or the Federal Food and Drug Administration. Oil

spill response, seafood house inspections etc. are examples of recovery activities that should be prioritized;

- d. Salvage whatever possible from the building if it is damaged;**
 - e. If needed, employees will be given permission to work out of their homes until temporary offices can be set up.**
- 4. If looting is a problem, the Executive Director may request security assistance from the Department of Finance and Administration.**
 - 5. Once the emergency phase of the recovery process is complete, employees shall begin documenting damages to critical habitats (oyster and sea grass beds), coastal preserves and waterfront improvements within the coastal zone. This documentation process should be prioritized in order to assess the most crucial matters first.**
 - 6. All emergency preparation and response activities will be logged daily and turned in to the DMR Administrative office for possible FEMA/MEMA reimbursement. The preparation and response activities shall also be entered on the monthly time sheet and recorded as Disaster Relief 613 in order to facilitate the recovery of FEMA/MEMA disaster aid.**

APPENDIX II

Louisiana Hurricane Evacuation Procedures

I. HURRICANES

Evacuation Procedures

Lyle S. St. Amant Marine Laboratory and Coastal Study Area 3

Evacuations Or Other Emergencies

Lyle St. Amant Marine Laboratory and Coastal Study Area 3

All year long, especially during hurricane season, all LDWF staff, and others using lab facilities will take special care to operate in a manner which will allow the laboratory to be quickly evacuated should a hurricane approach the Louisiana Coast. Boats, tractors and other movable equipment will be kept in good working order; sufficient fuel will be kept at the lab to operate tractors, boats, the emergency generator, and other equipment should evacuation be necessary. All boats and trucks are to be kept completely fueled at all times. Rope, chain, and other materials used in securing loose gear will be kept in adequate supply. Equipment, gear, and supplies should be stored after use. During hurricane season several state vehicles will be kept in away from the lab. Those vehicles will act as a shuttle to Grand Terre for vital personnel. They will also allow personnel necessary for boat evacuating to complete their evacuation duties in an efficient and timely manner. Other vehicles may be borrowed from Bourg, New Orleans, or Baton Rouge to help expedite the evacuation process.

Hurricane Procedures

Once a hurricane occurs in the Atlantic or a tropical storm occurs in the Gulf, personnel at the laboratory will observe the following procedures:

- A. Preliminary preparations will begin when a "hurricane watch" is declared, or when a hurricane is within 1200 miles of the mouth of the Mississippi River and tracking towards the Gulf Coast:
 - i. On-duty personnel will contact the Laboratory Director and Assistant Director and advise them that preliminary preparations are underway;
 - ii. All loose gear and small equipment items not being immediately used will be gathered up and stored in the laboratory building, workshop, or upper dormitory floor;
 - iii. Loose lumber, building materials and other items which cannot be moved will be secured with chains or ropes;
 - iv. All boats and tractors will be fueled up; fuel supplies for the emergency generator will be topped off.
 - v. All personnel should bring their state radios and chargers home with them.
- B. Final preparation will begin when a "hurricane alert" is declared or when a hurricane is within 600 miles of the mouth of the Mississippi:

- i. All laboratory and Coastal Study Area 3 personnel will be contacted and placed on standby status. Personnel not required to go to the lab and assist in final preparations will be expected to maintain contact with the lab. All personnel will be expected to assist as necessary to complete final preparations and evacuation;
 - ii. When building materials and equipment have been secured, the small tractor and the Ford tractor will be moved into the workshop. The latter not being put up until the Director gives the "word;
 - iii. Desks, file cabinets, books, and movable office equipment (computers, printers, microscopes, etc.) will be moved away from windows (and into the hall if possible) and covered with waterproof materials;
 - iv. Non-division and non-department personnel will leave the lab or show that they are capable of immediate evacuation without support from laboratory personnel;
 - v. Once final preparations are complete the Assistant Administrator and/or Administrator of the Marine Fisheries Division shall be notified by the Director.
- C. Evacuation of the Lab facility will be ordered by the Laboratory Director when a hurricane moves into the Gulf and may be tracking toward the Louisiana coast or when a hurricane forms in the Gulf.
 - i. All personnel at the laboratory, including non-division and non-department personnel, will leave the island when evacuation is ordered.
 - ii. If necessary, the large boats will be moved to shipyard above the flood gates and other vessels will be moved to higher ground; personnel will move state vehicles to their homes. At this time personnel will be assigned to evacuate vessels from Grand Terre:
 - iii. Personnel will be released to take care of their own family/property.
- D. As soon as practicable after the passage of the hurricane selected personnel will return to the lab and undertake any repairs which might minimize damage caused by the hurricane. Then remainder of staff will be called in.
- E. Home and cell phone numbers of affected personnel are:

APPENDIX III

Hurricane Preparedness based on Lessons learned from Katrina, Rita, Wilma, etc:

Hurricane Preparedness based on Lessons learned from Katrina, Rita, Wilma, etc:

From "Lessons Learned: preparing for the next Big One" (from Coastal Services Volume 9, Issue 3 May/June 2006 NOAA NOS Coastal Services Center) pp. 10-12

1. Work with cities and counties to educate them about Smart Growth (or Safe Growth)
 - a. Implement international building codes; develop community hazard mitigation and disaster recovery plans.
 - b. Educate people and communities about the hazard risks they face.
 - c. Develop relationships with emergency managers.
 - d. To take advantage of FEMA mitigation grants, monitoring of projects and beach profiles must be done in advance. Have knowledge and programs in place on how to apply for the grants before a hurricane hits.
 - e. Utilize technology in the permitting process- have every structure and setback line documented in GIS
 - f. Create and protect wetlands and other natural barriers. The first lines of defense against the destructive waves of a hurricane are trees, marshes, and other natural features
 - g. Develop and practice a hurricane preparedness plan. Have a detailed plan of the steps your staff members will have to take to prepare your office, agency, or site for an impending storm. Don't lose the basic things you'll need in order to operate
 - h. Before a storm. Evacuate vehicles off-site to several inland locations. Hauling vessels from water and securing them at an inland location should also be done if possible. Secure all office equipment by breaking down and elevating computers and covering all equipment with plastic. Secure files-create backups of backups and distribute them to a number of locations off-site-preferably out of state. Take important paper files with you when you evacuate.
 - i. Create a detailed communications plan- staff member's telephone and cell phone numbers, delegate one staff member to be in charge of tracking evacuation locations and contacts for next of kin. Have all staff members contact one out-of state person to report their whereabouts both before and after the storm. Invest in cell phones with text messaging options, or satellite phones. Have a rendezvous plan for staff members who may not be able to make outside contact
 - j. Have extra food, water, batteries, and other supplies as a backup for staff members whose home supplies might be wiped out. Implement your agency's plan early enough so that individuals still have time to secure their homes and evacuate. Have drills to practice the plan.
 - k. Develop a disaster recovery plan. Coordinate staff members into teams to help get their homes and property cleaned up as soon as possible. Coordinate staff members into teams to clean up office and site
 - l. Have petty cash on hand for emergencies
 - m. Alert staff members who evacuated to the status of their homes and property before they return to ease the shock, and to inform them of the equipment (chain saws, etc) they will need to bring back

- n. Have a contingency plan where your agency will operate if existing facility is destroyed
- o. Review and update your disaster preparedness plan
- p. Plan for emergency permitting and other post-disaster activities.