Boulder Emergency Operating Plan Analysis

By Josh Ellis 01/28/2024

Intro:

The Boulder Emergency Operating Plan is located in <u>Chapter 33</u> of Boulder's ordinances. It appears to have been adopted on 4/3/2008. Some elements appear to have been updated in 2021 as a result of the pandemic. Overall it heavily references the County's plan which is apparently included as "Appendix 2" but this document cannot be found easily anywhere online (town or county).

Analysis:

I have created a process flowchart (Figure 1) that attempts to follow who is supposed to do what in order to better understand how this ordinance instructs us to respond to an emergency. As you can see, the current process we've outlined is significantly deficient to the extent of being dangerous (in my opinion). I have added in steps that we need but are missing (boxes with a gray shade).

Some main points worth noting:

- The EOP does not describe structure or wildfires as a recognized hazard.
 - This is odd considering that wildfire is the most likely incident requiring a community-scale response.
- The EOP does not describe types of levels of emergencies, such as a standard response to a well-contained structure fire.
 - I presume that an EOP should provide guidance for all emergencies requiring a response, not just community-scale disasters.
- The only threshold offered by the EOP for whether to activate the "Emergency Operations Center" at the fire hall is "when the resource needs of an incident exceed the capabilities of the local response teams" (<u>33.08</u>).
 - It's easy to argue that this happens to us all the time and is therefore not an appropriate trigger.
- It is not clear how the EOC is physically established, who should be notified when it is, and who is responsible for doing what at the EOC.
 - As far as I can tell, Corry would call Judy saying "we've got a big problem" and she would then drive to the Fire Hall and.....?!? Having this sequence be super unclear in an emergency is a dangerous recipe for increasing, not decreasing, disaster.

- The EOP lists 4 priorities (life safety, incident stability, property & environmental protection (<u>33.04</u>)) but it's not clear how the EOC should accomplish anything in regards to these priorities.
 - This might be contained in the "Emergency Support Functions" (<u>33.09</u>) but all that says is: "Will be found in the County EOP that has all of the checklists to track an emergency if needed." Thanks, very useful in the moment.
 - These may or may not relate to the federal-level version of this which appears to be used for organizing federal support and not really about response tasks/how to respond.
- A Chain of Command is listed but it's not clear when or how this becomes relevant to the emergency response.
 - How does this relate to the IC system? Does the Mayor become the new IC once the EOC is established?
 - Does the someone have to die first or what triggers the next level of the chain?
 - Related: Why are multiple parties listed under the same level in the chain? This defeats the purpose of a Chain of Command.
- Methods of community notification are listed but it's not clear when or how this becomes relevant to the emergency response, or appropriate to the scale of the emergency.
 - This is the core concern that needs to be addressed to move forward with the Wildfire Council's "OnSolve" discussion.
- Evacuation locations are listed but other than that evacuations are entirely unaddressed.
 - Criteria for when one is appropriate would be a good idea.
 - Who can order one and who enforces it should be listed.
 - The only locations listed are all neighboring buildings (school, church, town hall), these could easily all be compromised by the same event.
- Criteria for terminating/ending the EOC at the fire hall should be included.
 - How do we know when the emergency is over and the town can resume to "(new) normal" operations?

Conclusion & Recommendations:

Significant process deficiencies make the current ordinance essentially impossible to follow in the event of a community-scale emergency. We need to establish an easy-to-follow, step-by-step sequence of events based upon clear triggers with roles and responsibilities outlined. This should cover all emergencies, small and large, with clear escalation points and what happens at each escalation point (a table would be a good way to present this info). We should look at other community plans before we recreate the wheel.

Figure 1: Current EOP Process Flowchart

(Also available for comment here after creating a free LucidChart account. Grey denotes that step is not currently in EOP)

