National Park Service
National Emergency Response Plan

Revised July 2004

Approved: Donald W. Murphy /s/ for Fran Mainella, Director
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Preamble

In response to the September 11, 2001 attack on America and the resultant homeland security issues, the National Park Service (NPS) has developed a National Emergency Response Plan (NERP). Hurricane Isabel in September 2003 caused severe damage to the three eastern regions and provided impetus to modify the November 2002 NERP. The basic format of this plan will be adopted in the future to manage any national crisis, large-scale emergency or designated special event to ensure a unified and coordinated response.

Executive Summary

The NPS is facing an unprecedented need to develop a servicewide strategy that provides for emergency response while maintaining basic mission responsibilities. The ability to strategically manage our finite resources is critical.

National parks are places that serve as symbols to the American public, the world of our natural and cultural heritage, and where we are expected to provide opportunities for recreation and solace. There is no time when the values of these areas have been more essential for the emotional and long term health of our citizens. The role national parks play in contributing to local and regional economic viability is essential to the national interest. These are places where resources must remain unimpaired for future generations. This fundamental responsibility should not be compromised; however, the agency must respond to the greater needs of the nation within its limited capabilities during times of crisis and special needs.

The NPS has a long history of responding to emergency needs during times of natural disasters. Our ability to respond to future threats in NPS areas as well as being available to respond to the needs of other land management and emergency service agencies, dictates a need to proactively address current and future workloads. While we may be able to meet immediate emergency requests, we must ensure the long-term capability to maintain basic NPS operations, including applying the fundamental Principle of Reserves – not depleting our limited park resources to a point where we fail to meet the basic mission of the Service or overextend our responders. We must also have the capacity to continue to respond to the full range of emergency situations: fire, search and rescue, law enforcement, emergency medical and natural disaster response.

This plan identifies a series of actions that will enable us to step up and respond to various levels of preparedness. The leadership of the agency is focused on maintaining the basic mission of the NPS in concert with the conditions mandated by a state of national emergency.

The human impacts that employees will encounter must be factored into a longer-term strategy. This means we must ensure adequate personnel and funding to limit the predictable “burn out” and stress that will no doubt result from disasters, potential future terrorism or other large scale emergencies. We must effectively utilize our limited human and fiscal resources, and ensure that public interests are being met.
Introduction

This plan defines a course of action that will provide an efficient, safe and dependable protection response, within parks and beyond NPS boundaries - while maintaining accountability to the Department of the Interior.

This plan reflects the NPS response in a time of national threat, or natural disaster. It is guided by the principle that protection of life is paramount. The plan reflects the view that effectively fielding NPS assets for their highest and best use - while upholding the nation’s expectations for protecting the parks - is the objective.

The NPS is accountable by statute to protect the nation’s resources within NPS boundaries and to provide for the security of the public visiting these sites. This responsibility is amplified with the acknowledgement that being the protector of many high visibility icons of American heritage and the host landscape of certain elements of the public utility infrastructure, our sites may be targets of terrorist acts. Over 84 million acres of NPS lands are also impacted by a wide range of natural disasters including hurricanes, floods, earthquakes, tsunamis and typhoons.

Any NPS response beyond unit boundaries must take into account potential vulnerabilities and shortfalls left in the wake of such a response and develop mitigating tactics. In the same sense that urban shopkeepers return to find their places of business looted after mass evacuations, we can expect that resources – perhaps irreplaceable resources - are at higher risk in parks that deploy emergency service personnel. Aware of this risk relationship, parks must prepare and update acceptable “draw-down” levels and identify protection and other needed staff for deployment if called upon. Accordingly, this plan invokes the draw-down concept nationally, accepted by many emergency service organizations, describing levels of personnel commitment - in advance - based on varying levels of activity at any given park unit (such as visitor use seasons, fire call-out, vacancies, etc.). This plan provides guidance on the preparation of park draw-down plans.

In a related way, we know that often NPS personnel are members of local fire, EMS, Red Cross and rescue organizations in communities outside parks. In some cases, they provide the core of these community’s services. Dispatching these same personnel to distant assignments has ramifications beyond those felt within the park boundaries.

Several studies of the NPS protection programs over the last few years have confirmed that levels of emergency service personnel in parks are below necessary effective strength. The NPS will seek to address this situation to improve the agency’s ability to function effectively in the extreme severity of current circumstances.

NPS personnel must operate under the statutes governing cooperative agreements, obligation of funds and scope of duty liability for individual employees. The appropriateness of the NPS response, reviewed through the incident critique that follows every emergency, will likely not take into account the tension of the moment nor forgive shortcuts taken for the best of reasons. Similarly we must be ever vigilant in monitoring the health and safety of our responders as frequent and sustained levels of out of park commitments can have far reaching impacts to their personal lives and health.
NPS Response Levels

A national emergency may exist when there is a significant forecasted need for or activation of NPS resources to meet internal and/or external demands for a special event, emergency, stabilization or cleanup response. This may be the result of a single event requiring many resources such as a large international event or may be the cumulative effect of multiple related and unrelated incidents occurring at the same time, such as response to a hurricane or flood. When staffing demands may tax the resources of the NPS to the point that normal operations must be modified or curtailed, the Director will declare an appropriate National Response Level.

For homeland security/terrorism-related incidents, the NPS will automatically assume the threat levels declared by the Department of Homeland Security and follow actions defined in Appendices A and B.

There are five distinct NPS response levels of external response/internal mission needs. Levels may be designated geographically and may vary from region to region. In the case of a large hurricane, the area where the hurricane is expected to make landfall may be designated a Level V, while surrounding regions may be at Level III or IV:

**Level I - Normal Operations (GREEN)**
Parks and offices function as they normally do. External responses would be limited to those authorized by Memorandum of Understanding or Agreement.

**Level II - Heightened Level of Preparedness (BLUE)**
The NPS would essentially operate as normal. The major impact to NPS resources would be a requirement for increased planning and coordination with partners at local, regional and national levels.

**Level III - Alert Status (YELLOW)**
Parks are put on alert to be prepared to respond to dispatch orders. In each Park, personnel assess their facilities for any concerns that need to be addressed (i.e. security needs) and ensure preplanned activities are carried out (i.e. preparing property for a flood or hurricane). Information is shared with staff and status of personnel and equipment is known. Parks confer with their Regional Office as to availability of response resources (as appropriate for an emergency) and to determine appropriate actions to take based on the evolving stages of a national or regional emergency. Resource needs may vary depending on the nature of the emergency. Appropriate resources may be needed to perform incident management requirements, perform initial attack, size up and post event assessment, stabilization, budget ramifications/needs, cleanup and repair/rehab as appropriate.

**Level IV - National /Regional Urgency (ORANGE)**
This level may be declared nationally or regionally depending on the nature of the emergency and the need, or projected need for resources. The NPS would support external and internal requests for assistance, commensurate with established NPS/DOI priorities and legislated mission requirements. Less than optimal services could occur in some parks to ensure NPS resources are provided where needed, however, emergency
services should not be jeopardized in a park due to reallocation of resources out of the park. Resources may be needed for long periods of time, up to 21 days per assignment.

**Level V - National/Regional Emergency (RED)**

This level may be declared nationally or regionally depending on the nature of the emergency and the need, or projected need for resources. Requested NPS resources, people and equipment, would be immediately made available/dispatched internally, and/or externally to support other federal or local jurisdictions within the scope of existing authorities. Commitments of large numbers of resources may be needed initially to ensure adequate response until stabilization, restoration, recovery or rehabilitation efforts begin. Park provided services, including emergency services may be severely impacted. Closures of parks or portions of parks may be necessary to facilitate a proper response.

**Declaration of National Response Level**

The National Response Level (NRL) is determined by the Director. Under normal operations the NPS functions at a Level I. When conditions dictate, the Director will declare a Level II, III, IV or V response level. This declaration will typically be issued by memorandum or verbally to the Regional Directors and Superintendents.

**Determining National Response Level**

The director should consult with senior staff, program managers or other agencies (i.e. National Weather Service, Homeland Security Department, etc.) in setting the National Response Level. A variety of Levels may be declared as well. For instance, when the likely landfall location of a hurricane is declared by the National Weather Service, a Level V may be declared in the vicinity of the projected path of the hurricane, while areas and regions outside the immediate vicinity may be placed in Levels III or IV, depending on the hurricane’s intensity and forecasted impacts. The Director, in declaring a National Response Level, considers many factors including:

**Nature of the Incident**

When incidents occur that affect the nation as a whole and require a national mobilization effort, the NPS response should be consistent with other federal agencies. For incidents that primarily affect NPS areas, the burden of response on the part of the NPS is expected to be higher.

**Magnitude of the Incident**

The number of emergency services personnel or other staff that are necessary to support incident management within the NPS and externally is the primary factor in determining an appropriate response level. The magnitude may be affected by the sheer numbers of resources required by a major incident, or can be the cumulative effect of a number of smaller incidents, occurring at the same time. The draw-down of critical staff is affected not only by call-outs to incidents, but when staff are otherwise unavailable due to extended leave, vacancies, military reserve activations, details to other agencies, commitments to Special Event Teams (SET), Incident Management Teams (IMT), Critical Incident Stress Management (CISM), etc.
**Duration**
The duration of an incident is a significant factor in determining an appropriate response level. A short-term incident, requiring many people to work or manage the incident, may not present a significant impact to the park area or the NPS. However, parks losing even small numbers of resources for sustained periods of time may be significantly impacted.

**Seasonality**
For many parks, the amount of visitation varies greatly from season to season. Depending on the season of the call-up, the impacts to a park area may vary greatly. During the low season, parks may be better able to provide resources in response to a national emergency without significantly impacting the park’s ability to perform the basic core mission.

**Draw-down Planning**
Under all circumstances, a sustained draw down of park staffing to meet critical needs elsewhere comes with a cost.

Draw-down plans will assist park managers in making informed decisions about how and where to allocate resources for each response level. It is important that the system for determining availability and allocation of resources distributes the burden as equitably as possible among all parks in all regions.

Parks will prepare a planning document that shows, under National Response Levels III through V, the minimum staffing needed to provide essential mission functions. This planning should not only consider emergency services personnel, but also maintenance, resource management and other personnel that may be needed depending on the nature of the emergency. The plan will also specify the impacts to the park in terms of fulfilling the basic mission requirements with reduced staffing levels.

In determining the minimum level of resources necessary to meet essential mission related expectations, the Superintendent should consider:
- Officer safety
- Public safety
- Contractual obligations (i.e. concession contracts)
- Legal agreements/obligations with other organizations and entities, such as fire protection agreements, security, law enforcement, structural fire, etc.
- Visitation levels and visitor protection

**Potential Impacts to Parks at National Response Levels**

**Level I**
- None (unless park staff is already insufficient to accomplish core mission requirements)
- All incidents are handled within the park using available resources
Level II
- The NPS would essentially operate as normal
- The primary impact to NPS resources would be a requirement for increased planning and coordination with partners at local, regional and national levels
- Parks maintain awareness of evolving regional or national emergency

Level III
- Overtime or backfill required in some instances to maintain basic operations
- Facilities and personnel prepared for possible closures
- Reduced visitor service hours for short duration
- Scheduled leave may be cancelled
- Non-critical training may be postponed
- All incidents are handled within the park or with regional resources
- Park and/or regional staffs dedicate time for planning, assessing availability of needed resources, specialty strike teams identified, placed on call and/or staged close to the incident

Level IV
- Leave cancelled and administrative relief sought to restore the leave to the next leave year if necessary
- Emergency hiring authorities used to boost staffing
- All but essential training cancelled
- Limited closures of public use facilities/sites, visiting hours limited
- Partners and mutual aid cooperators notified that mutual aid responses may not be forthcoming or timely
- Resource availability tracked regionally or nationally and regional and national incident command or watch desk operations activated in preparation for incident management. Coordination operations and dispatch systems are activated to coordinate and allocate resources
- Consider canceling large special events due to staffing shortfalls or security risks.
- Response to emergency incidents in the park will not be jeopardized
- Local and/or national incident specific emergency plans activated (See appendices to this plan for specific national plans)

Level V
- Normal park operations curtailed
- Visitor use facilities may close
- Full scale park closures and evacuations may be necessary
- Skeleton staff may remain in park if safe to do so
- Certain visitor activities curtailed to minimize risk (fires, special use permit, etc.)
- If protection staffs are focused on the emergency or called out of park, other (non-law enforcement) uniformed staff may be placed in the field at parks for prevention, deterrence and public assistance purposes
- Public notified not to expect normal response times
• Mutual Aid cooperators asked to provide basic fire, emergency medical service and law enforcement coverage
• Response to emergency incidents in parks may be seriously impacted

**Coordination of Resources**

Multi-Agency Coordination Groups (MACG) are utilized at all organizational levels of the wildland fire community – local, sub-geographic, regional and national. While not all emergencies involve other agencies, the NPS may form Multi-Regional Coordination Groups (MRCG) to coordinate NPS resources to tasks that have been assigned the NPS.

Given a shortage of, or competition for, resources or when more than one agency/bureau/NPS region is experiencing incidents, the MACG or MRCG function is to determine priorities of incidents and allocate/reallocate critical resources. MACG/MRCG are also charged to develop/recommend contingency action plans and to ensure (and issue) coordinated situation assessments. When necessary, the NPS will actively participate in the MACG in the marshalling of our resources with other federal agencies.

The NPS member to a MACG must have appropriate delegations of authority from the NPS Director, regional director or superintendent, as appropriate. This authority essentially is the legal mechanism by which NPS resources can be ordered and assigned anywhere in the United States. At Levels IV and V, MRCG members shall have written delegated authority from their Regional Directors for ordering and deploying resources where needed.

MRCG members will be comprised of personnel from the seven NPS regions and WASO, made up of employees with appropriate skills based on the nature of any given emergency. For large-scale law enforcement emergencies, regional chief rangers or their designees, as well as representatives of the WASO Division of Law Enforcement and Emergency Service and the United States Park Police shall serve on MRCG. Similarly, a large-scale natural disaster may have a mix of emergency service, maintenance, law enforcement, resource management and logistics management personnel working as regional MRCG members.

Regardless of the nature of the large-scale emergency, and unless otherwise declared by the Director in a Delegation of Authority or by an Incident or Area Commander, the National Incident Coordination Center (NICC) system may be used to coordinate the assessment of incident needs and for the ordering and deployment of resources nationwide. The MACG/MRCG will work with the NICC system to provide priorities for resource deployment based on criteria developed for the specific emergency. The MACG/MRCG will project long-term needs and provide intelligence for the emergency working closely with local and area incident commanders. In cases of extended and continual deployment of resources such as in Homeland Security support or in recovery efforts following a natural disaster, the IC/MRCG may streamline the mobilization process and reduce costs by utilizing an NPS Coordination Center, such as the Eastern Incident Coordination Center at Shenandoah National Park.

As provided by NPS Management Policies, all emergencies shall be managed in accordance with the provisions of the *Incident Management Handbook*. This will ensure emergencies are managed uniformly and safely. (See Appendix C)
Appendix A: Counter-Terrorism Preparedness Planning, Notification Procedures and Implementation Plan

Terrorism Preparedness Planning

To support a nationwide capacity for counter-terrorism response the NPS will maintain Special Event Teams comprised of law enforcement rangers and US Park Police officers, the National and four (4) Regional Incident Management Teams. These teams will be considered national resources at Threat Levels IV and V as rapid response to terrorism-related incidents.

In light of the challenges we face today, all parks, Regional Office and Washington Headquarters are to ensure annually updated Continuity of Operations Plans (COOP) as well as Emergency Operations Plans that include fire, bomb and evacuation procedures are in place AND personnel are trained/drilled on these plans. Parks should be aware of, and consider, the following issues in emergency planning:

- Communication facilities such as cell-phone towers and FAA facilities.
- Dams.
- Military bases.
- Railroads.
- Other strategic facilities such as bridges, power plants, interstate highways, tunnels, etc. within or near the parks.
- Consider public safety issues when reviewing applications for special events. If adequate public safety cannot be ensured for the event, consideration should be given to not permitting the event.
- Parks adjacent to, or collocated with military bases, strategic facilities and installations and parks with high risk sites should have mutual aid agreements with appropriate agencies which clearly spell out the NPS’s responsibilities during emergencies, as well as any reciprocal funding agreements for services the NPS renders.
- Ensure appropriate deputations are obtained in advance so NPS law enforcement personnel have authority outside of NPS boundaries.
- Regional intelligence officers are identified, top-secret clearances are obtained and they are assigned to appropriate anti-terrorism taskforces.
- Regional law enforcement specialists or special agents are attached to regional Incident Management Team (IMT) to train with, and serve as a command staff member of the IMT if activated during Preparedness Levels 4 and 5.
- Due to the nature of law enforcement sensitive or national security information that will flow through a command post during terrorism-related incidents, IMT and MRCG should have a mechanism for dealing with sensitive, classified or secret information. All members of the IMT, MRCG or others such as budget officers and non-law enforcement managers may need to have appropriate background investigations and security clearances, or access to sensitive information will be limited to appropriate members of
the team. These individuals need to understand the requirements related to classified, law enforcement only or sensitive information and that it is on a need to know basis.

- Parks without protection operations seek planning assistance from neighboring parks or the regional offices.
- Other seasonal emergencies that typically occur such as fire seasons, hurricane season, etc.

Appendix B: Notification Procedures and Preliminary Actions for Preparedness Levels IV and V

- The Director will determine the preparedness level and notify the National Leadership Council, park superintendents and MRCG of that threat level, and establish a national Emergency Law and Order account.

- Regional intelligence liaison officers may go to assigned terrorism task force command centers.

- Regional SETs and IMT’s placed on alert.

- The Multi-Region Coordination Group (MRCG) is activated. This MRCG would be composed of the seven Regional Chief Rangers, a US Park Police (USPP) representative and the Chief, Division of Law Enforcement and Emergency Services.

- MRCG will establish criteria to be used when prioritizing resource orders including officer, employee and public safety, property at risk, potential for loss of cultural and natural resources, likelihood of a terrorist attack and chances of success if a terrorist attacks.

- Parks will ensure actions are taken to meet declared threat levels, confirm draw down levels and report their readiness, needs and available resources for mobilization.

Appendix C: National Park Service Threat Advisory System

NPS Threat Levels

The Homeland Security Advisory System’s graduated threat conditions may be assigned for the entire nation or they may be set for a specific geographic area. Threat conditions within the NPS may vary by geographical location and/or national treasure. The Director of the NPS may alter the threat level declared by the Office of Homeland Security on a case-by-case basis when local threat conditions dictate.

A threat assessment process is a continuous process. Prepare a threat assessment prior to and during the initial planning for an operation, but also continue to work through the threat
assessment process during the operation. This ensures that the assessment remains complete and valid and that it will continue to help identify new or changing intelligence requirements.

Four steps to the threat assessment process.

1. Define the environment:
   • Identify significant characteristics of the environment (population, geography and weather, infrastructure, jurisdictions, etc.).
   • Identify the limits of your area of operations (AO).
   • Establish the limits of your area of interest (are you interested in your entire AO, or just a portion of it).
   • Identify the amount of detail required and feasible within the time available for preparing the initial threat assessment (be realistic with your expectations).
   • Collect and/or identify the information and the intelligence needed to complete the remainder of the process (what do you know, what do you need to know).

2. Describe the AO’s effects, with particular emphasis on the area of interest:
   • Examine the terrain (where is movement possible, what conveyances can be utilized, where is illicit movement most likely to go undetected).
   • Examine seasonal weather patterns.
   • Examine other characteristics that may be unique to the AO (fishing season, hunting season, planned large public gatherings, etc.).
   • Describe the AO’s effects on your ability to operate, and on the ability of your threat to operate.

3. Evaluate the threat:
   • Describe in words the threat’s tactics and options.
   • Identify specific locations in the AO that may present a high value target to the threat (access to communications, transportation corridors, etc.).
   • Identify the threat’s capabilities (use of aircraft, use of vessels, ability to corrupt officials, communications monitoring, etc.).
   • The preparation of graphics and maps may help to better describe the threat environment.

4. Determine threat courses of action (COA):
   • Identify the threat’s likely objectives and desired end state.
   • Identify all COA available to the threat.
   • Evaluate and prioritize each COA (put yourself in the threat’s mindset, use your local knowledge to determine what is likely and what is unlikely – but consider everything).

Appendix D: Managing non-emergency events

Since September 11, 2001, and the development of the National Emergency Response Plan (NERP), the addition of Homeland Security duties/assignments to pre-existing emergency and non-emergency incidents such as wildland fires, hurricanes, events of regional or national
significance, etc., has resulted in growing competition for limited resources, including both personnel and equipment. The scope of the NERP, prior to May 2004, has been emergency incidents. However, there has been growing dependence upon MRCG to meet non-emergency needs that have been primarily in the form of special events.

In order to ensure that MRCG is functioning under the authority of the Director and this plan, the following guidelines have been developed.

In general, individual parks and regions are expected, when approving special events, to do so with the understanding that additional NPS resources may not be available to assist in managing the event.

It is understood that certain events, by their nature, magnitude, significance, duration, notoriety, etc., will exceed an individual park or region's capacity, and therefore require multi-regional resources to successfully manage them. In these instances, the Superintendent, through the Regional Director, will request the approval of the Director to: 1) permit the event to occur, and 2) request assistance from MRCG, through their regional MRCG representative, in mobilizing the necessary resources to assist. Upon approval of the Director, the Associate Director for Visitor and Resource Protection will notify MRCG chair/coordinator who will activate MRCG and begin facilitating the response of resources to the approved event(s).

In recognition of the fact that there will be competition for limited resources, particularly if the Department of Homeland Security threat levels are elevated above yellow and/or disasters in the form of fires, floods, hurricanes, etc., occur simultaneous to or during the planning of said events, these events may be severely curtailed or cancelled in order to ensure that higher priority resource needs at ICON's, critical infrastructure sites or border parks are being met. The decision to curtail or cancel an event(s) will be made by the Director following the recommendation of MRCG to the Associate Director for Visitor and Resource Protection.

In order to ensure that there are sufficient resources readily available to respond to emergency incidents under the auspices of the NERP, 100 personnel are posted on MRCG database, rotating every three weeks, based upon a regional proportional fair-share basis. With the addition of resources for non-emergency events being managed by MRCG, there is the likelihood that demands will exceed supply (100), particularly as described in the preceding paragraph. The posting and utilization of resources beyond the 100 that are identified will require the written approval of the Director, as the likely outcome of doing so may result in closures and/or public use restrictions in units of the National Park system.