

SUNSHINE COAST REGIONAL DISTRICT STAFF REPORT

TO: Planning and Community Development Committee – January 10, 2019

AUTHOR: Janette Loveys, Chief Administrative Officer

SUBJECT: **SCRD EMERGENCY PLAN REVIEW**

RECOMMENDATION(S)

THAT the report titled SCRD Emergency Plan Review be received;

AND THAT staff and/or consultant present the Emergency Plan Review to the three member municipalities and the Sunshine Coast Emergency Program Planning Committee;

AND THAT a budget proposal with respect to Recommendations contained in Section 5 and 6 of the SCRD Emergency Plan Review be brought to the 2019 Round 1 Budget deliberations for consideration;

AND FURTHER THAT a 3 Year Service Plan be developed and brought back to Committee for consideration.

BACKGROUND

The Sunshine Coast Emergency Program (SCEP) is a function of the Sunshine Coast Regional District and encompasses all municipalities and electoral areas on the lower Sunshine Coast from Port Mellon to Earls Cove. This integrated program was one of the first regional emergency programs in the Province of British Columbia.

To ensure the program is kept up to date and in compliance with Provincial regulations, the Sunshine Coast Regional District contracted Dave Mitchell & Associates to conduct a review of the Sunshine Coast Emergency Program.

DISCUSSION

Dave Mitchell & Associates were retained initially to conduct a review of the SCRD's four fire services; however, it was determined that a review of the Sunshine Coast Emergency Program would also be beneficial and timely, due to the similar nature of the services.

The main focus of the Emergency Plan Review was to review the statutory and regulatory requirements underpinning the Sunshine Coast Emergency Program and to review the bylaw structure currently in place for each participating local government which establishes and implements the Sunshine Coast Emergency Program.

The extensive review concluded with 13 recommendations to the Sunshine Coast Regional District for implementation. Pages 39 to 43 of the Emergency Plan Review contain a summary

of all the Recommendations. As a next step forward, staff recommend that a budget proposal to implement Recommendations contained in Section 5 and 6 of the SCRD Emergency Plan Review be brought to the 2019 Round 1 Budget deliberations for consideration.

Furthermore, staff are recommending that a 3 year service plan be developed and brought back to Committee for consideration.

Organizational and Intergovernmental Implications

Staff recommend presenting the Emergency Plan Review to the three member municipalities and the Sunshine Coast Emergency Program Planning Committee.

Financial Implications

A budget proposal to move forward with the most critical recommendations in the Review be brought to the 2019 Round 1 Budget deliberations for consideration. The intention would be to include a scope of work to assist the 3 member municipalities in addressing all the legislative and bylaw work at the same time to ensure alignment and communication.

The remaining Recommendations will be incorporated into a 3 year service plan to ensure a balanced and timely approach to implementation.

STRATEGIC PLAN AND RELATED POLICIES

The SCRD's mission "to provide leadership and quality services to our community through effective and responsive government" shows commitment to ensuring that there are effective and organized management of critical Emergency Services for the Sunshine Coast.

CONCLUSION

SCEP is a function of the Sunshine Coast Regional District and encompasses all municipalities and electoral areas on the lower Sunshine Coast. To ensure the program is kept up to date and in compliance with Provincial regulations, the SCRD contracted Dave Mitchell & Associates to conduct a review of the Sunshine Coast Emergency Program.

Staff recommend presenting the Emergency Plan Review to the three member municipalities and the Sunshine Coast Emergency Program Planning Committee.

Staff recommend a budget proposal to implement the most critical recommendations and the creation of a 3 year service plan to ensure a balanced approach to implementation of the other recommendations contained in the review.

Reviewed by:			
Manager	X-R.Michael	Finance	X-T.Perreault
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ATTACHMENT

Attachment A: SCRD Emergency Plan Review



Sunshine Coast Regional District
Emergency Plan Review

Dave Mitchell & Associates Ltd.

December 2018

Sunshine Coast Regional District – Emergency Plan Review

The Sunshine Coast Regional District (“SCRD”) Emergency Plan covers four local authorities (each, a “Local Authority”) on the Sunshine Coast: the SCRD and the electoral areas for which it is responsible, the Sechelt Indian Government District (“SIGD”), Sechelt and Gibsons. The current form of the emergency plan (the “Plan”) was originally drafted in 2009 and is currently in its third iteration. The following memorandum reviews:

- an introduction and outline of the project;
- a high-level review of issues affecting emergency programs generally;
- a consideration of the recent report by the Auditor General for Local Government into emergency planning;¹
- a summary assessment of the current state of the SCRD’s existing Emergency Program and the Plan;
- a review of the statutory and regulatory basis of the Plan;
- a detailed review of the bylaws which underpin its creation and implementation;
- a review of the content and arrangement of the Plan itself (with a standalone summary of the principal suggestions and recommendations flowing from that review);
- a brief review of certain organizational matters including the Emergency Program Coordinator position itself; and
- a summary list of the recommendations found throughout this memorandum.

Nothing in this memorandum constitutes or should be considered legal advice. The SCRD and its area partners should review and assess the comments below using their usual legal processes.

¹ AGLG *Improving Local Government Emergency Management: Considerations for Local Government Council and Board Members* (April 2018) (the “AGLG Report”).

Contents

1. Introduction	4
2. Project Outline	4
3. Emergency Programs – Overview and Issues.....	5
Overview	5
The AGLG Report	6
Role of Elected Officials	7
Ensuring Availability of Water Supplies	7
Updated Risk Assessments.....	8
Business Continuity Planning	8
Asset Management Planning.....	8
Training and Exercises	8
4. Summary Assessment of the SCRD's Emergency Program	9
5. Statutory, Regulatory and Bylaw Review	12
Local Authority Bylaws	13
Other Issues.....	19
6. Current Form of Emergency Plan.....	20
7. Review of the Plan	21
Overview Section – Section 1.....	22
EOC Management – Section 2.....	25
EOC Administration, Activation and Functions – Sections 2, 3 and 4	26
Resource Management – Section 5	28
Declarations and Evacuations – Section 6	29
Recovery – Section 7	31
Hazard-Specific Plans – Section 8	31
Summary of Recommendations from the Plan Review	31
8. Supporting & Implementing Materials.....	34
9. Administration and Organization	36
Budget	36
Emergency Program Coordinator Position	36
Volunteers.....	37
Other Organizational Issues	38
10. Summary of Recommendations	39

11. Glossary of Defined Terms43

1. Introduction

The Sunshine Coast Regional District (the “SCRD”) is responsible for managing a region-wide emergency program (the “Emergency Program”) covering the unincorporated areas of the SCR D, the Sechelt Indian Government District lands,² the District of Sechelt and the Town of Gibsons. The requirement to establish and implement emergency planning is mandated by the *Emergency Program Act*, [RSBC 1996], ch. 111 (the “EPA”). The four participating local authorities, however, have decided to establish a unified structure which encompasses the entire Sunshine Coast, as reflected in SCR D Bylaw No. 564.³ In our view, this approach reflects best practice, as it better enables a consistent and coordinated approach to managing major emergencies, which may well span several local government jurisdictions. A unified program also reduces the overall cost, which is shared among the participating local authorities, rather than requiring the establishment of four separate systems, all of which would have to meet the requirements of the EPA.

2. Project Outline

Dave Mitchell & Associates (the “Consultants”) were retained initially to undertake a review of the SCR D’s four fire services.⁴ As part of that review, we were proposing to examine the integration of the fire departments into overall emergency planning. The SCR D requested that we undertake a separate review of the existing SCR D Emergency Program at the same time as conducting the review of fire services.

In connection with that review, we have undertaken the following work:

- reviewed the statutory and regulatory requirements underpinning the Emergency Program, including the EPA and its regulations, and the recent report by the Auditor General for Local Government into emergency planning;⁵
- reviewed the bylaw structure currently in place for each participating local government which establishes and implements the Emergency Program;
- reviewed the 2017 form of the Emergency Program against a number of precedents from other local governments;

² Except for a small portion of the lands which are located in the Powell River Regional District.

³ *Sunshine Coast Regional District Emergency Measures Plan and Administration Bylaw No. 564, 2005.*

⁴ Dave Mitchell & Associates Ltd., *Sunshine Coast Regional District – Fire Services Strategic Plan 2018*, submitted separately to the SCR D Board.

⁵ Auditor General for Local Government, *Improving Local Government Emergency Management: Considerations for Local Government Council and Board Members* (April 2018) (the “AGLG Report”).

- reviewed three thumb drives, each containing several thousand files of materials which are intended to be used to support the activation and operation of the Emergency Program;
- met with senior staff of the SCRD, including the CAO, the Chief Financial Officer, the Senior Manager of Human Resources, the Senior Manager, Administration & Legislative Services and Chief Michael from the Gibsons and District Volunteer Fire Department.

When undertaking the on-site reviews with the four SCRD fire departments, we included questions about the integration of the fire services into the emergency program and the fire chiefs' understanding of its operation and activation. The Emergency Program Coordinator left his position before we had an opportunity formally to interview him.

3. Emergency Programs – Overview and Issues

Overview

Ideally, an emergency program should meet the following objectives:

1. It should be easy to follow, and clearly laid out, to enable participants to understand their roles and responsibilities and to be effective in developing and managing responses to major emergencies. The program's layout needs to be logical and clear, and the documentation should provide sufficient guidance so that it is not dependent on the immediate presence of one or two highly trained individuals.
2. The supporting materials need to be comprehensive but readily accessible. Whether it is a response plan for an anticipated emergency, lists of available assets, emergency contacts, or forms needed to operate the Emergency Operations Centre ("EOC"), the materials need to be immediately available so that time is not lost hunting for a form or tracking down a critical contact.
3. The program and its supporting materials must be current.
4. There must be sufficient staff trained and able to implement the program, so that it is not dependent on a single individual.
5. There should be a clear understanding of the roles and responsibilities of participants, from the "Policy Group" (which typically comprises elected officials), to each position within the EOC.
6. The program needs to be regularly exercised, with active participation from all of the local governments, as well as the emergency response agencies, supporting volunteer agencies and other external stakeholders (e.g., the major utilities, Vancouver Coastal Health and BC Ferries), to ensure that emergency plan can be effectively implemented and any response properly managed.

7. There needs to be a well-developed and strong relationship with volunteers, who will be critical for responding to, managing the effects of, and recovering from a major emergency. While this dependence is true of even the largest communities in the province, it is particularly the case for the SCRD and its participating local governments.⁶ The volunteer fire services, emergency support services (“ESS”), search and rescue, and back-up communications through amateur radio operators, together comprise the backbone for any response to a major emergency on the Sunshine Coast.

The AGLG Report

The AGLG Report on emergency planning by local government surveyed the need for such planning, provided an overview of responsibilities and statutory obligations, and highlighted a number of areas where the Auditor General’s review had identified deficiencies or concerns. In particular, the AGLG Report identified the following widespread challenges or deficiencies with local government emergency planning:⁷

- Lack a strategic approach to emergency management;
- Lack organization-wide business continuity planning;
- Focus primarily on the first three phases of emergency management (mitigation and prevention, preparedness and response procedures), with little emphasis on recovery strategies and resilience;
- Have insufficient knowledge of emergency procedures and may be unaware of roles and responsibilities of various parties involved;
- Rarely review or revise emergency response plans after their initial development;
- Rarely test, practise or consistently implement emergency response plans;
- Do not recognize the impact of emergencies and recovery impact on vital systems such as Information Technology services or communications; [and]
- Do not always have viable or accessible alternative water supplies available in the event of emergencies affecting drinking water services.

⁶ The AGLG Report, in relation to the major events in 2017 and 2018, noted that “Flooding in April 2017 forced over 2,500 British Columbians to be evacuated while 2017 forest fires displaced more than 65,000 people over a six-week period. Volunteers were the backbone of the [ESS] response.” AGLG Report, p. 20.

⁷ AGLG Report, p. 5 – bullet points are direct quotes.

While the report should be reviewed in detail by both elected officials and local government staff,⁸ a few of the identified challenges are highlighted below.

Role of Elected Officials

The Auditor General noted that the role of elected officials was not always as clearly understood as it might be:⁹

Elected officials need to understand their specific role in an emergency, and need to support the expert staff that they have in their organization and to whom they have provided the resources for appropriate training and preparation [...]

The council/board collectively – not individual elected officials – has the authority to respond to an emergency. [...] [footnote omitted]

Elected officials may not have particular expertise in emergency management and normally should not be a part of the incident response team or the emergency operations centre. Newly-elected officials sometimes may think their role is to direct resources and give out orders during an incident. However, to ensure appropriately trained and prepared personnel maximize safety in such cases, elected officials should refrain from this.

Ensuring Availability of Water Supplies

The AGLG Report particularly focused on the need for local government to fully integrate their emergency planning with the corresponding plans for their water systems, and to ensure that their program fully contemplates how water supplies will be managed in an emergency. There are two sections of the report dealing with water supplies, and the list of resources provided covers both emergency planning and drinking water supplies:

- “Why is it important to involve Emergency Management and Drinking Water Departments in the development of Emergency Plans?” (p. 22);
- “Does your Local Government have an alternative drinking water supply in case of an emergency?” (p. 28); and
- Emergency Management and Drinking Water Resources (p. 42ff).¹⁰

⁸ We examined elements of the AGLG Report with SCRD senior staff during a review session, who were already well aware of the document.

⁹ AGLG Report, p. 16.

¹⁰ The AGLG Report also specifically identified the need to conduct a risk assessment of drinking water supplies in its discussion of “Mitigation and Prevention of Risks” at p. 25, and again in the discussion of developing comprehensive asset management plans at p. 29.

Updated Risk Assessments

The AGLG Report notes that local governments need to have up-to-date risk assessments – a listing of facilities and assets that identifies the strengths and weaknesses of each, and which considers the types of threats that could impact them.¹¹

Business Continuity Planning

The need for each local government to have undertaken business continuity planning was noted in the AGLG Report. This type of planning is a necessary adjunct to an emergency program, since the failure of critical local government facilities or infrastructure could adversely impact any response to an emergency or disaster. As such, the AGLG Report recommended as follows:¹²

“Local governments should prepare business continuity plans to ensure that emergency operations and critical services continue despite the loss of power, facilities, IT infrastructure and/or communication systems. Backup power and alternative water source(s) need to be ready to be brought online quickly.”

Asset Management Planning

Related to both the risk assessment and business continuity planning, the AGLG Report noted that local governments need to ensure that they have developed comprehensive asset management plans. A fully operating asset management plan includes:¹³

- a full asset inventory;
- an up to date assessment of asset conditions (value, depreciation rate and life-span);
- a funding model to enable asset replacement in a timely fashion and to avoid unfunded capital deficits; and
- ensuring that principal assets are replaced before they fail.

Training and Exercises

The AGLG Report observed that good training and regular exercise of the emergency plan are “critical for a successful response.”¹⁴ The training and exercises are essential to ensure that staff and other participating stakeholders understand their respective roles and functions, and that a response to a major incident will be effective. Including relevant external agencies in

¹¹ AGLG Report p. 25

¹² AGLG Report, p. 27.

¹³ AGLG Report, p. 29.

¹⁴ AGLG Report, p. 31. Training is addressed in section 15 on p. 31; undertaking of exercises is discussed in section 16, at p. 32.

these sessions is important to enable participants to get to know one another, and to better enable them to work together when faced with a major incident.

In addition, exercises enable the local government to test and evaluate their plans and procedures and enable it to identify any gaps or weaknesses. These exercises can test portions of a plan or the entire program, and can range from workshops or seminars to tabletop exercises or full-scale operational tests. Exercises need to be broadly-based, and incorporate external agencies and support organizations.

4. Summary Assessment of the SCRD's Emergency Program

The existing Emergency Program document (the "Plan") was first developed in 2009. It has gone through three updates, with the third revision being dated January 2017. It should be noted that a fourth revision, dated near the end of February 2018, was identified during a review of the Emergency Program's standalone laptop, which laptop provides back-up in the event that the connection to the SCRD's IT network is lost. According to staff, this revision of the Plan has not been issued,¹⁵ and, for the purposes of the detailed analysis in the next sections below, we have confined our review to the 2017 version.

As noted above, the Emergency Program is a shared service: it is operated by the SCRD, but covers three other local authorities – District of Sechelt ("Sechelt"), the Sechelt Indian Government District ("SIGD") and the Town of Gibsons ("Gibsons") – in addition to the unincorporated areas of the SCRD. The SCRD is responsible for managing the Emergency Program, with input from each of the other participating local authorities.

The existing form of the Emergency Program is showing its age in a number of ways. These issues are addressed in greater detail below, but the list below highlights certain of the matters that need to be addressed:

1. Bylaw Structure: The existing bylaw structure needs to be reviewed and updated. The SCRD has three relevant bylaws (SCRD Bylaw No. 564, which establishes the Emergency Program and Emergency Measures Organization; SCRD Bylaw No. 565, which sets out the process for declaring emergencies in the unincorporated areas of the SCRD; and the original service establishment bylaw, SCRD Bylaw No. 1041), while each of Sechelt, the SIGD and Gibsons has a single bylaw, each of which largely tracks SCRD Bylaw No. 565, and deals with the process for those local authorities to declare emergencies. Over time, some of the processes described in the various bylaws have changed, or terms used have become inconsistent. We have provided detailed comments below on the issues that need to be addressed. In general, once the bylaws are updated, we recommend that they be reviewed at least once every five years. See the discussion in section 5, below, and the corresponding recommendations.

¹⁵ Discussions with CAO Loveys and Chief Michael.

2. Plan Document: The main Plan document itself could stand significant updating and revision. In the detailed review in section 7, below, we have examined the first seven sections of the Plan against a half-dozen precedents, and provided detailed comments on portions that should be updated.¹⁶ Some of the principal concerns and challenges include the following:
 - Although there have been three iterations (with a fourth prepared in draft), there is no way to track prior revisions or understand what has been changed.
 - There is no clear process for updating / revising the Plan (or any of the supporting materials), no prescribed process for approving those updates and no prescribed interval for conducting reviews and updates.
 - The Plan document, which is loaded on the SCRD network in a PDF format, is structured to be hyperlinked to supporting materials. When using the networked version, however, those links are broken.¹⁷ Even if the links worked, anyone using the Plan (e.g., a supporting external agency) who is not allowed access to the SCRD network, would not be able to link to the underlying materials. When the base Plan document is overhauled, we would recommend that SCRD IT staff be included in the working group, to provide advice on how best to construct a document that will remain linked to the necessary supporting materials.
 - We did not see a distribution list for the main Plan document: it is critical that each participating local authority and relevant external agency/stakeholder has a working copy of the Plan, and that the distribution be properly tracked and dated, so that no one is relying on an out-of-date version.
3. Supporting Materials: The base Plan document is supplemented by various supporting materials. Both the Plan itself and a wide array of supporting materials, are contained on external thumb drives. We were initially provided with two such drives by CAO Loveys when we commenced the review. Latterly, in connection with reviewing the standalone laptop and EOC kits, a more recent version of the thumb drive was identified, and added to the review. Based on internal dating, the thumb drives appear to be from 2011, 2013 and 2018, respectively.¹⁸ Several issues should be noted regarding these thumb drives:
 - (a) There is a vast array of materials on each thumb drive:

¹⁶ Section 8 of the Emergency Program deals with specific operational scenarios, and is being reviewed internally by Chief Michael. Section 9 is a list of acronyms and definitions.

¹⁷ We would note that the fourth draft iteration, which is present on the standalone laptop, still has functioning links to the background/supporting materials.

¹⁸ There is no external marking on the thumb drive that would allow a user to determine what year it dates from.

- (i) 2011: 1.55 GB of data; ~1669 files in 212 folders;
 - (ii) 2013: 2.90 GB of data; ~ 3999 files in 585 folders; and
 - (iii) 2018: 3.91 GB of data; ~4972 files in 665 folders.
- (b) The materials, however, are poorly organized and often out-of-date. There are frequently multiple copies or different versions of the same document. Unless one already knew where the materials were stored, it would be challenging to use the thumb drives in an operational environment.
- (c) There is a great deal of material that is not directly relevant to any operational activation of the EOC, or response to an emergency. Non-relevant materials need to be ruthlessly culled, to make the collection more usable.
- (d) A distribution list was associated with the 2018 version of the thumb drive, showing the individuals to whom such drives were to be delivered: however, it did not indicate whether the 2018 versions had been fully distributed, or when this had occurred.

Overall, it proved challenging to review and/or use the materials on the thumb drives, and there was some uncertainty among SCRD staff as to whether the versions that they held were current. See the discussion in section 8, below, and corresponding recommendations.

4. Training: We reviewed the current training spreadsheet.¹⁹ In general, it appears that a reasonable number of SCRD staff members have received training, ranging from basic to more advanced courses. The spreadsheet, however, was not complete, in that it failed to include all principal SCRD participants (e.g., the CAO and Senior Manager Human Resources). In addition, the list includes principally SCRD staff:²⁰ it is important for the SCRD to ensure that staff members in other local authorities are included in the training and that such training is properly tracked.

Recommendation: Ensure that training is provided or made available to staff from each of the participating Local Authorities and appropriately tracked.

5. Business Continuity Planning: Each of the participating Local Authorities needs to ensure that it has well-considered business continuity plans in place, and these plans should be integrated into the overall SCRD Emergency Program. Senior SCRD staff noted that comprehensive continuity planning was still being developed for the regional

¹⁹ SCRD Emergency Training Matrix

²⁰ Included on the list of trained personnel was one member from the SIGD, and representatives from several external agencies including the RCMP, Sechelt Fire, Pender Harbour Fire, Search & Rescue, and ESS.

district, although there were continuity plans for certain individual departments or areas (e.g., information technology).

Recommendation: Each of the participating Local Authorities needs to develop and maintain a business continuity plan. That plan should be integrated into the SCRD Emergency Program.

6. Hazard Vulnerability and Risk Analyses (“HVRAs”): The existing risks assessments, which cover each of the SCRD, Gibsons, Sechelt and the SIGD,²¹ were completed in 2005, and are now somewhat dated. The SCRD should look at refreshing them in the short-to-medium term. See the discussion section 7 and corresponding recommendation.
7. Emergency Program Coordinator Position: The Emergency Program Coordinator (“EPC”) resigned in August 2018. Based on our review of comparable positions in other regional districts (e.g., Kootenay Boundary Regional District (“KBRD”), Thompson Nicola Regional District (“TNRD”) and Regional District of Okanagan Similkameen), these types of positions are typically exempt roles. Given the breadth of authority granted to the role, including financial and organizational, we are recommending that the position be reviewed before it is filled. In our separate report on the SCRD’s fire services (the “Fire Service Review”), we have suggested that the SCRD consider combining this role with that of a fire services coordinator. That approach is used successfully in a number of other regional districts, including the KBRD and TNRD.²² See the discussion in section 9 and corresponding recommendation. See also the Fire Service Review.

5. Statutory, Regulatory and Bylaw Review

The obligation to establish emergency planning is set out in the *Emergency Program Act* (“EPA”):

- EPA s. 6(2) & (2.1) – Local Authorities (municipal councils and regional district boards) must prepare local emergency plans covering “preparation for, response to and recovery from emergencies and disasters.”
- The content of a local emergency plan must meet the requirements specified in the *Local Authority Emergency Management Regulation*, BC Reg. 380/95 (the “Regs”), including, among other things:
 - planning for all potential emergencies and disasters that could affect the Local Authority’s jurisdictional area (Regs, s. 2(1)(a));

²¹ There also is a supplement covering Gambier and Keats islands.

²² The KBRD has integrated the function into its regional fire service. The TNRD has created a combined emergency services oversight position that covers both the fire services and the emergency program.

- assessing the relative risk of occurrences of different disasters/emergencies (Regs, s. 2(1)(b));
 - providing a process for reviewing and updating the emergency plan (Regs, s. 2(3)(a));
 - providing a training program for all emergency response staff to whom responsibilities are assigned (Regs, s. 2(3)(b));
 - establishing the process by which the plan is to be implemented (Regs, s. 2(3)(d));
 - establishing notification processes to warn of an impending emergency or disaster (Regs, s. 2(3)(e)); and
 - identifying and establishing processes for mobilizing personnel and equipment, managing resources (e.g., food, shelter, clothing, transportation, medical services) and identifying priorities for itself and service providers in connection with restoring essential services (Regs, s. 2(3)(c), (f), (g) & (h)).
- EPA ss. 3, 3.1 & 4: The Local Authority must maintain an “emergency management organization” to implement the local emergency plan and may delegate its powers and obligations (except the power to declare an emergency) to such an organization. It may also appoint a coordinator or committee to oversee its program and may delegate powers to such coordinator or committee on the same basis.

In the SCRD, a single emergency management organization (the “EMO”) has been established. Gibsons, the SCRD, Sechelt, and the SIGD have each delegated their powers and authority under the EPA to this organization, other than the power to declare a state of emergency (which must remain with each Local Authority).

Local Authority Bylaws

The bylaw structure governing emergency planning and response on the Sunshine Coast is as follows:

SCRD:

- BC Reg. 268/2001 (which grants the SCRD the “same power that a municipality has under the *Emergency Program Act*”).
- *Sunshine Coast Regional District Emergency Measures Service Establishing Bylaw No. 1041, 2001* (as amended). This bylaw established the region-wide emergency measures service, as well as the corresponding “Emergency Measures Organization.” The maximum tax rate for this service is \$0.10/\$1,000 of assessed value of land and improvements.

- Note: the name of the entity created – the “Emergency Measures Organization” – was changed in SCR D Bylaw No. 564 (see below) to “Emergency Management Organization” which more correctly tracks the language used in the EPA. This change of name should be reflected in Bylaw No. 1041, and track through in the individual bylaws of each of the participating Local Authorities.
- *Sunshine Coast Regional District Emergency Measures Plan and Administration Bylaw No. 564, 2005* (as amended) (“SCR D Bylaw No. 564”). This bylaw provides for the operation of a comprehensive emergency management program throughout the SCR D.
 - An Emergency Executive Committee (the “EEC”) is created by this bylaw, with specific duties under section 5. In 2010, this committee’s dissolution was contemplated along with bylaw amendments.²³ Based on input from SCR D staff, although the EEC does not actually operate any longer, SCR D Bylaw No. 564 has never been updated. This bylaw should be updated as a priority to correspond to how the EMO is currently being overseen and managed. Alternatively, the EEC should be reconstituted by the participating Local Authorities.
 - The EEC was required to submit for Board approval any emergency plans that are created (s. 5.1(b)). There is no express provision for dealing with amendments to the plan(s). Issues:
 - The process for undertaking and implementing amendments to the Plan should be set out in any revision to SCR D Bylaw No. 564.
 - The Plan is in its third iteration (with a fourth iteration, dated 2018, prepared in draft). The most recently distributed version was updated in 2017 - and it is not clear that the amendments were reviewed with or approved by the Board.²⁴ Based on staff comments, it would appear that none of amendments made to the Plan have been explicitly approved by the Board, although the bylaw suggests that the Plan itself (and, presumably, amendments) are subject to Board approval.
 - The name and composition of the entity (the Emergency Management Organization vs. Emergency Measures Organization) should be reviewed. Issues:
 - In the definition of the term, clarify who has the authority to make appointments to the EMO under s. 2.1(j): the current bylaw is silent on this issue.

²³ SCR D Board Minutes, 15 July 2010, Recommendations #21 & #22

²⁴ We also have seen no evidence that the original form of the plan was formally approved by the Board.

- In addition, a single, consistent, defined term for this organization should be used in each constituting bylaw of the various participating Local Authorities (SCRD, Sechelt, SIGD, and Gibsons).
 - The definition of the term “Emergency Plan” should be reviewed and updated:
 - Consider redrafting the definition to read “means the local emergency plan or plans required to be prepared, established and maintained under section 6 of the Act, as described in section 5 of this Bylaw”.
 - Section 5 deals with the duties of the non-functioning ECC. However those duties are assigned, the defined term “Emergency Plan” should be used (in the current draft, this definition would appear in section 5.1(b) of the bylaw).
 - Consider updating the defined term “Emergency Measures Co-ordinator” (section 2.1(i)). In the Plan document itself, this position is referred to as the “Emergency Program Coordinator.” A single agreed term should be introduced and used consistently by all four Local Authorities when referring to this position.
 - Section 6.1, which deals with who is authorized to activate the Emergency Plan, still contains some language in square brackets, suggesting that it remains in draft. When this bylaw is updated:
 - Clarify who can implement/activate the Plan.
 - Consider specifying who can activate the EOC and establish a process for updating or revising this authority.
 - Section 7.1(b) – minor typo in the first line (should read “persons”). Issue:
 - The SCRД should consider whether persons exempted from liability under this bylaw also should be entitled to the protection of the SCRД’s indemnification bylaw.²⁵ If individuals, whether employees or volunteers, are to be included, the indemnity bylaw should track the language in what is now section 740 of the *Local Government Act*. In particular, Bylaw No. 564 should note that the individuals protected under section 7.1 of that bylaw are considered “regional district officials” within the meaning of section 740(2) of *Local Government Act*.
- *Sunshine Coast Regional District Local Emergency Bylaw No. 565, 2005* (“Bylaw No. 565”). This bylaw provides the SCRД with the authority to declare a local state of emergency in the Electoral Areas for which it is responsible, and to implement the

²⁵SCRД, *Officers and Employees Indemnification Bylaw No. 511, 2001*. This bylaw needs updating to reflect changes to the *Local Government Act*.

Emergency Plan. When Bylaw No. 565 is considered for review, the following issues should be addressed:

- Section 3.1 still has square bracketed language in it – it is not clear if that was still in draft when approved.
- Sections 3.4 (c), (d) & (i): These sections deal with the exercise of certain powers under the declaration: controlling/prohibiting travel; restoring essential facilities and distributing supplies; and entering onto land or into premises. When an emergency is declared by the SCR D, careful consideration is required of what constitutes the “Affected Area”, as the exercise of these powers under the declaration is then limited to those defined areas. In particular, given the limited nature of the road network on the coast, the SCR D may need to ensure that it gives itself the necessary control over the access routes necessary to ensure that it can control traffic flow – including the movement of people, the flow of supplies and access for emergency vehicles.²⁶
 - If a particular emergency or incident requires control over the road network, even if the incident is related principally to some portion of the unincorporated areas of the SCR D, it may be necessary to have the other Local Authorities also declare states of emergency in order to control the relevant roadways.
- If defined terms are changed as suggested in relation to SCR D Bylaw No. 564, care must be taken to ensure that corresponding changes are also made to this bylaw.

District of Sechelt

- *District of Sechelt State of Local Emergency Bylaw No. 319, 2005* (“Sechelt Bylaw No. 319”). This bylaw authorizes the Sechelt council to declare a state of emergency. It largely tracks the comparable SCR D Bylaw No. 565 discussed above (though it does not use the terms “Affected Area” in the same, limiting way as did SCR D Bylaw No. 565). One of the crucial features of this bylaw is its interconnection with and delegation of authority to the EMO established and operated by the SCR D under SCR D Bylaw No. 564. In that regard, we would suggest as follows:
 - There should be an operative provision²⁷ expressly noting that the Plan is adopted as the emergency plan for Sechelt, in fulfilment of its obligations under section 6(2) of the EPA.

²⁶ This issue is not an issue for the participating municipal and SIGD governments, since their declarations are effectively “border to border” under their respective bylaws.

²⁷ Sechelt’s participation in the SCR D Emergency Program is noted in the recitals, but should be more clearly set out in an operative provision and tied to the exercise of authority when a state of local emergency is declared.

- Similarly, the bylaw should expressly note that it is a participant in the SCRD Emergency Management Organization, which has been established to comply with section 6(3) of the EPA. Arguably, the existence of a compliant emergency plan and corresponding management organization are predicates to the exercise of authority under section 12 of the EPA (i.e., the declaration of a state of local emergency).
 - Note that Sechelt Bylaw No. 319 refers to the “Emergency Management Organization” as the “Emergency Measures Organization” with a somewhat different description of its composition. As noted above, the definition of this organization needs to be consistent in each Local Authority’s bylaw.
 - In each of the Sechelt, SIGD and Gibsons bylaws, the definition of “Declaration of a state of local emergency” is missing the “a”.
- The delegation of authority and power to the SCRD, as set out in section 3.4, should be reviewed. The existing delegation is quite vaguely worded. It should be clear that the powers obtained under a declaration of local emergency by Sechelt under section 3.3 are delegated to the Emergency Management Organization and/or the Emergency Measures Coordinator.
- It also should be noted that Sechelt appears to have retained the authority to utilize the powers granted by a local declaration of emergency, separately from the operation of Plan. This approach may be problematic, as Sechelt does not itself have a standalone emergency plan or emergency management organization, and the exercise of powers under the EPA is predicated on such plan and organization being in place. Sechelt likely should indicate that it will exercise its authority in accordance with the Plan through the EMO. The Plan itself should provide for or contemplate circumstances (e.g., catastrophic failures and loss of communications) where each Local Authority may need to operate independently.
- In section 3.3, the phrase “declaration of a state of emergency” should read “declaration of a state **of local** emergency” (which is the defined term).
- A definition of “Emergency Program Coordinator” or “Emergency Measures Coordinator” should be added. The position is also named differently in different sections of this bylaw (ss. 2.1(h), 3.2(b), 3.5(b)). Whatever term is used should be applied uniformly across all four bylaws of the participating Local Authorities.
- Although the defined term “Affected Area” is included, it is not used in the bylaw (except, possibly, in s. 3.2(c), where the term is used in an uncapitalized form; the definition may not actually be needed, since the section simply is tracking the language in the EPA).

Sechelt Indian Government District

- *Sechelt Indian Government District State of Local Emergency Bylaw (Sunshine Coast) Law No. 2007-01* (the “SIGD Bylaw”). This bylaw is substantively identical to the Sechelt Bylaw No. 319 and the comments made in respect of that bylaw also apply, except:
 - Although this bylaw refers to the “Emergency Management Organization,” it describes that organization differently than the Sechelt and SCRD Bylaws. The definition of this organization needs to be consistent in each Local Authority’s bylaw.
 - The bylaw does not consistently capitalize defined terms (e.g., the term “District”).
- We have not reviewed the underlying legal authority or obligations of the SIGD. For the purposes of this review, we have assumed that they constitute a “local authority” for the purposes of the EPA, as suggested by the recitals to the SIGD bylaw.
- Although stated to be a full participant in the Emergency Plan, it appears that the SIGD may also maintain its own, separate emergency procedures manual.²⁸ It is not clear if the SIGD Manual has progressed beyond the draft state. In the manual, the SIGD has a separately designated EOC, as well as two public places of shelter.²⁹ The SIGD Manual notes that it intended “to organize and prepare our immediate SBL#2 neighbourhood in conjunction with the Sunshine Coast Emergency Program.” The SCRD’s Emergency Plan, however, does not mention the existence of this SIGD initiative and it is not clear from either document how emergency response and recovery operations would be coordinated.

Gibsons

- *Town of Gibsons State of Local Emergency Bylaw No. 1030, 2006* (“Gibsons Bylaw No. 1030”). This bylaw is in substantively identical form to the Sechelt Bylaw No. 319 and the same comments apply, except:
 - Gibsons Bylaw No. 1030 uses the same “Emergency Management Organization” definition as the SIGD Bylaw.

²⁸ A 2010 draft emergency plan, lightly commented on by the SCRD Emergency Program Coordinator, is on the 2013 and 2018 USB thumb drives that were provided for review: Sechelt Indian Government District, *Emergency Plan and Procedures Manual* (the “SIGD Manual”).

²⁹ The EOC is identified as being the “Health and Social Development Building”; public shelter locations are the Community Hall and the Public Works building. SIGD Manual, pp. 6 & 7.

- Note: we have reviewed the version of this Gibsons bylaw from the 2013 USB thumb drive. It is in an MS-Word format and it is not clear if this is the most current version (though it tracks closely to the bylaws of the other Local Authorities).

Other Issues

The existing Emergency Plan and various constituting bylaws cover four Local Authorities on the Sunshine Coast. However, there are actually six local governments which are relevant to delivery of emergency response services. Both the Sechelt and Pender Harbour fire departments are owned, controlled and operated by separate Improvement Districts. While in practice there is no doubt that the two fire departments would operate as directed in a major emergency (and have integrated seamlessly in past activations of the EOC), there is a gap in the underpinning legal structure that should be examined and potentially closed. Improvement Districts are not expressly covered by the EPA, but their inclusion in the Emergency Program would be possible by contract. We would recommend that the SCR D review the situation with the Improvement Districts and consider formally integrating them into the EMO and the Plan.

The Kootenay Boundary Regional District, which also utilizes an area-wide service and emergency management organization, underpins its operations with a service agreement, in addition to the complementary bylaw structure. Consideration should be given to developing a service agreement among the SCR D and the other Local Authorities (including the two Improvement Districts) in relation to the operation of the Plan and Emergency Management Organization. This agreement could spell out the respective roles to be played, and deal with matters such as the coordination of emergency declarations by each Local Authority.

Recommendation: The SCR D should, in consultation with the three other Local Authorities, review and update each of its relevant bylaws: SCR D Bylaw No. 1041, SCR D Bylaw No. 564, and SCR D Bylaw No. 565. While there are a number of areas where inconsistent terms are used that should be corrected, the most critical updates relate to the following:

- (a) The role of the EEC: If that committee is to be retained, it needs to be reactivated. Alternatively, whatever new process is agreed for managing the responsibilities set out in section 5 of SCR D Bylaw No. 564 needs to be set out in the updated bylaw; and
- (b) The process by which the Plan is updated and changes approved needs to be explicitly set out. We also would recommend that the frequency of formal reviews of the Plan be set out in either the bylaw or in Board policy.

Recommendation: Each of other Local Authorities will need to review and update their respective bylaws to address certain inconsistent terms and to track any changes made by the SCR D in accordance with the previous recommendation. In addition, each of the other Local Authorities should consider expressly noting, in operative provisions in their respective bylaws, that they are adopting the Plan (as it may be amended from time to time) as the emergency plan for their respective jurisdictions, and that the EMO established under SCR D Bylaw No. 1041 constitutes the EMO for their jurisdiction as well. There also should be a

clear statement that when powers are delegated as contemplated by the EPA, they are being delegated to the EMO.

Recommendation: The improvement districts which operate the Sechelt and Pender Harbour fire departments, respectively, should be formally added to the EMO. We would recommend this be undertaken through a contractual arrangement. This contract, in addition to formally adding the improvement districts, also could be used to address other issues such as how training and exercises will be managed, the process for coordinating declarations of emergency and the delegation of powers when required.

6. Current Form of Emergency Plan

The Plan was first prepared in 2009 by Bob Stubbings. It has undergone two subsequent revisions, with the most recent being dated 2017.³⁰ As noted above, a fourth edition, prepared in February 2018, exists in draft. Our comments are limited to the distributed 2017 version. One of the gaps in the document is the lack of any formal record of revisions which have been made to the Plan. A revisions record needs to be added, and updates tracked in any future iterations. As noted above, the process by which revisions are authorized, and the frequency of formal reviews of the Plan, both need to be more clearly specified in SCRD Bylaw No. 564.

There also should be a distribution list, showing the entities and individuals to whom the Plan (and its supporting materials) has been distributed or changes notified. The distribution list should include (among others): each of the Local Authorities (and may include a number of positions within each Local Authority); each fire service (including the two Improvement Districts), ESS, the RCMP, BC Ambulance Service, Vancouver Coastal Health, BC Hydro, Fortis Gas, Telus, SD 46, Sunshine Coast Search and Rescue, Royal Canadian Marine Search and Rescue, and Emergency Management BC (“EMBC”). The distribution can be managed electronically, and the list should show the date of distribution.

The Plan itself follows a standard format in use by other jurisdictions (for example, it closely tracks the plan in place in the Thompson-Nicola Regional District in terms of substance and arrangement). That being said, the overall organization of the document could usefully be updated and revised. As part of reviewing the Plan, we have considered the emergency plans in use by the following local governments as precedents:

- Kootenay Boundary Regional District (“KBRD”);
- Prince George (“PG”);
- Regional District of Central-Kootenay (“RDCK”);
- Regional District of Nanaimo (“RDN”);

³⁰ The cover sheet suggests that the third edition is dated January 2017, but the PDF document itself, in its footer, suggests that the actual date is August 2017.

- Regional District of Okanagan-Similkameen (“RDOS”); and
- Thompson-Nicola Regional District (“TNRD”).

Copies of these plans have been provided to SCR D staff along with this report. Where we have suggested either expanding or revising the Plan, a cross-reference to an appropriate precedent is included, if available. The precedents will aid in developing or revising the corresponding sections in the Plan.

We would note also that the Peace River Regional District (“PRRD”) has developed a standalone handbook, expressly for elected officials. This handbook reviews, at a high level, how the PRRD’s emergency program works, the role of elected officials during an EOC activation and/or emergency, and, in basic terms, how the EOC can be expected to operate. This booklet is commendably concise (~10 pages), but informative, and is intended to supplement the more detailed emergency plan document.³¹ A copy of this booklet has also been provided to SCR D staff for review.

Recommendation: When the Plan is updated, the precedents referred to should be used to assist in any redrafting or the addition of new sections. Consideration also should be given to developing a high-level handbook for elected officials along the model used by the PRRD.

7. Review of the Plan

The Plan is divided into eight operative sections (plus a preface and a ninth section consisting of a list of acronyms and definitions). The operative sections are as follows:

1. Overview
2. EOC Management
3. EOC Activation and Response
4. EOC Functions
5. Resource Management
6. Declarations and Evacuations
7. Recovery
8. Hazard-Specific Roles and Procedures.

Each of these sections, other than Section 8, will be examined below, and, where relevant, issues identified or recommendations made regarding the inclusion of additional material.

³¹ PRRD, *Elected Officials Emergency Management Handbook* (2017).

Section 8, which deals with specific operational responses to identified potential incidents, is being reviewed internally by Chief Michael.

As a starting point, we would note that the Plan is connected by hyperlinks to a wide array of additional or supporting material, much of which could be critical for users. These materials are only available if the user is connected to the SCRD computer network, or has access to the single, standalone laptop used by the EPC. We would note that, in the sessions with SCRD staff, it proved difficult to find the current form of the plan on the network and, once found, the hyperlinks generally did not work.

The hyperlink approach presents issues if there are network connection problems or if the user does not have permission to access the SCRD network. To the extent possible, the Plan should be available, in its entirety, as a standalone document or series of connected documents. For example, it should be included in its entirety on the USB thumb drives, in an up-to-date form, with all materials available to all authorized users. Similarly, if it is to be distributed to (for example) emergency response organizations (fire, RCMP, BCAS, SAR, ESS), all of the materials need to be accessible by those agencies.

Overview Section – Section 1

The Overview Section covers the following matters: Introduction, Purpose and Scope, Emergency Response Organization (i.e., what system is being used) and a series of (essentially) extended definitions for the terms “Incident Command Post,” “Emergency Operations Centre” (“EOC”), “Ministry Regional Operations Centre”³² and “Provincial Regional Emergency Operations Centre” (“PREOC”).

We would recommend significantly updating this overview section, and that it should be expressly localized to the SCRD circumstances. In particular, we would suggest that:

- The purpose and scope section should describe the breadth of application of the Plan, including all of its participants (i.e., all of the Electoral Areas for which the SCRD is responsible, plus Sechelt, the SIGD and Gibsons; once updated, it should also include reference to the fire service Improvement Districts).³³ In relation to the SIGD, to the extent that the Band is operating a separate emergency plan (complete with EOC), as well as a separate “SIB 72 Hour Emergency Plan,”³⁴ the process by which operations will be coordinated and managed needs to be considered. At present, there is no express consideration of how the SCRD EOC will coordinate with the SIGD.

³² The TNRD Plan, which follows almost exactly the same format, notes that it is unlikely a regional district EOC would ever interact with an MROC. The discussion likely is included only because the MROC appears in the EMBC flow chart used in figure 4.1 of the Plan.

³³ While this point is noted in the preface, it is directly relevant to the question of the overall scope and should be reiterated in this section.

³⁴ Draft plan dated 21 March 2011.

In addition, the structure of the Emergency Management Organization should be described along with an explanation or overview of how each entity participates in the Plan (e.g., through the identification of liaisons and contact points).

- Precedents: RDOS Plan, s. 4.1 (Concept of Operations – General); KBRD Plan, ss. 2.2.6, 2.3; see also the KBRD “Executive Summary”, which provides a useful, easily understood overview of how emergency management operates in the KBRD.
- A new section should be added which describes the underlying legal authority for the Plan and how it operates within the framework of the EPA. This section should identify and briefly discuss the EPA and Regs, as well as the enabling bylaws of each jurisdiction. If a service agreement is concluded as suggested above, this agreement also should be identified.
 - Precedent: KBRD Plan, ss. 2.2.2, 2.2.4, 2.2.5, 15
- Consideration should be given to developing a more coherent narrative that explains the role of the EOC and Incident Command Post (“ICP”) in the overall context of how the BC Emergency Management System (“BCEMS”) operates, including the role of the Provincial Regional Emergency Operations Centre (“PREOC”) and Provincial Emergency Coordination Centre (“PECC”). As it currently stands, the existing three sections (ICP, EOC and PREOC) are inter-connected, but that inter-connection is unclear from the text. These sections also tie into section 3 (Activation and Response) where the BCEMS system is described in more detail.
 - Precedent: RDCK Plan, s. 1.3 (Purpose of an EOC); KBRD Plan (s. 1.3).
- In relation to other materials required to implement the Plan, the overview should explain, in general terms, what these materials comprise and how they can be accessed. As noted above, the materials should be readily accessible by anyone expected to use or operate under the Plan (except, perhaps, that certain detailed information related to contacts or personal information, may need greater control). If all of the hyperlinked documents are also available on the thumb drives, this point should be expressly noted in the section entitled “Use of this Plan.”
 - If the thumb drives are to be used (and be useful):
 - they must have all of the relevant materials needed to implement the Plan;
 - they must be up-to-date and have a file organizational structure that is tied to the arrangement of the Plan; and
 - they should be stripped of extraneous, non-essential material. For example, on the thumb drives provided for review, there is a broad selection of materials that are not directly or usefully related to

implementing the Plan or operating the EOC – such several dozen pictures of the arrival of the 200-bed emergency hospital in Gibsons in 2006.

- The use of the HVRAs, and corresponding risk matrices, to inform the Plan should be noted.
 - Regs, s. 2(1)(b).
- The regular provision of training and use of table top and other exercises, are critical to ensuring that during a major emergency and EOC activation, the response is well-coordinated, effective and efficient. The Plan should include a section, either in the introduction or possibly in a standalone section, dealing with training and exercises.
- The concept of a “Policy Group” is an element of the BCEMS structure. Although referenced in the Plan, there is no discussion of its composition apart from a short definition which states that it consists “of elected officials of the Sunshine Coast Governments” and “may be established to provide policy direction to the EOC Director”. The composition of this group should be pre-determined and criteria established for its activation.
- Finally, a section should be added dealing with Plan revisions and updates (including supporting and supplemental material). This section should identify who is authorized to make revisions, how they are approved and how frequently the Plan and supporting materials are to be reviewed and/or updated. Note that some portions (e.g., contact lists, supply lists and other resource lists) will need more frequent updates than others (e.g., the HVRAs). We would recommend that contact lists be updated as required and checked at least semi-annually; resource and supply lists should be confirmed and updated annually; and that the Plan itself be updated as required and formally reviewed annually. The HVRA assessments are expensive to undertake (though updates would likely be less expensive than the initial assessment). The existing HRVAs were completed in 2005:³⁵ given the changes on the Coast since then, an update likely is in order and should be built into the budget cycle in the near future (1 – 3 years).
 - Precedent: KBRD Plan, s. 2.2.3 (note: there is no requirement under the EPA to conduct an *annual* HVRA assessment as stated in the KBRD Plan).
 - Regs, s. 3.1(a): “require a periodic review and updating of the local emergency plan and establish a procedure for that review and revision” (emphasis added).

³⁵ The HRVAs were prepared by an external consultant, Emergex, and all are dated 2005. They cover: the SCRD (generically), Sechelt, the SIGD lands, Gibsons, and Gambier and Keats Islands.

EOC Management – Section 2

The first elements of section 2 are highly localized, and deal with the specific resources available to the SCR D including:

- the primary EOC;
- the two alternative or secondary EOCs; and
- emergency hospital resources.

We would note that the secondary EOC in Sechelt shown in the 2017 version of the Plan was decommissioned in 2018, as a result of problems with mold. The “Transit Building” on Mason road has been re-designated as the auxiliary EOC in the Sechelt area.³⁶

The EOC locations are identified and mapping provided. As noted above, if the SIGD has established an EOC as suggested in the draft SIGD Manual, it also should be listed in the Plan.

The resources available at the three SCR D EOCs, however, have not been identified – the Plan notes that the floorplans and equipment specifications (e.g., generator capacity, etc.) remain “under development”.³⁷ The capabilities available to the EOCs should be documented, including back up power supplies, other resources and supplies, food and water for EOC staff, etc. Some of that documentation should be incorporated in the Plan (such as floorplans), while resources available to support EOC operations should be kept on a regularly reviewed and updated set of lists that are identified in this section.³⁸

- Precedent: See RDN Plan, s. 1, “Suggested Emergency Supply Inventory”, which contains a recommended on-hand set of emergency supplies (pp. 30 – 33); they also have a recommended “Grab & Go” kit for personnel who are “EOC responders” (p. 35).
- See also: RDOS Plan, s. 5.10, “EOC Layout” which shows a generic layout to be adapted to their specific needs (ideally, the layout would be based on individual floorplans of each of the SCR D’s EOCs).
- Also: RDOS Plan, s. 5.12, “Equipment and Supplies”.

³⁶ The draft 2018 version of the Plan noted that the trailer that had been used in Sechelt had been decommissioned. CAO Loveys provided the detail on the replacement of that site with the Mason Road location.

³⁷ This language was included in the original version of the Plan in 2009 and was never updated as originally contemplated.

³⁸ Section 5 (Resource Management) notes that a “comprehensive list” of resources is maintained on the Vital Services Directory of the SCR D network, and on the USB memory sticks issued on activation. To the extent that these lists fulfil the requirements noted above, they should be more clearly identified and connected to the Plan itself.

The resources included in the 200-bed emergency hospital and two casualty collection units are contained in hyper-linked documents and documents on the USB thumb drives. These lists were never updated: in the most recent thumb drive provided (2018) the lists are dated 2009.³⁹

EOC Administration, Activation and Functions – Sections 2, 3 and 4

The balance of section 2 of the Plan deals with the Management Team, EOC Administration and Media and Public Relations. Section 3 deals with EOC “activation and response” (and primarily is an outline of the BCEMS model) and section 4 addresses specific functions within the EOC itself.

While the content of these sections generally tracks with that of the comparators we examined, the overall organization and arrangement could usefully be reviewed. In particular, we would recommend reviewing and potentially revising these sections by reference to the following precedents:

- KBRD Plan, ss. 3 (Guiding Principles), 4 (Program Goals, Objectives and Strategies), 5 (EOC Guidelines) and 6 (Plan Activation and Demobilization);
- RDOS Plan, ss. 2 (BCEMS), 4 (Concept of Operations) and 5 (Emergency Operations Centre); and
- RDCK Plan, ss. 1.3 (Purpose of an EOC), and 2 (EOC Activation and Demobilization). The RDCK plan is much narrower and less content rich than the two other precedents.

In terms of content, the Plan could usefully include more discussion of the following:

- EOC demobilization. This is only briefly covered in section 4, at page 4-6 of the current Plan.
 - For good precedents, see the RDCK Plan, section 2.2 and the KBRD Plan, section 6.5 (Demobilization)
- After-action reporting and debriefings. These issues are identified but not discussed in the current Plan. See pp. 5-11/12 (“Action Reports After”) and for debriefings, at p. 1-8 in the section headed “Transfer of Responsibilities” and at p. 4-6, where a debriefing form for departing EOC personnel is hyperlinked. There are, however, no express provisions in the Plan for conducting post-event debriefing exercises after a major incident.⁴⁰

³⁹ We would note that, in relation to the emergency hospital, the Federal Government has recently decommissioned the equipment. Updating of these particular lists, therefore, will not be necessary. However, the lack of regular confirmation that the equipment lists were correct is a problem that affects the Emergency Program generally.

⁴⁰ The section entitled “Transfer of Responsibilities” does contemplate this might happen, but the process or basis for conducting such a debriefing is not set out in the Plan.

- For precedents, see: KBRD Plan, s. 5.20 (Debriefings); RDOS Plan, s. 9.5 (After-Action Reports).
- Although section 3 is titled “EOC Activation and Response”, it does not include a description of how and by whom the Plan is implemented and the EOC activated. That discussion is found (to some degree) in section 4, “Plan Activation and Termination.” These sections should be reviewed and the following issues considered or addressed:
 - The delegation of powers to activate the Plan mentioned in section 4 needs to be clear (see Bylaw No. 564 discussion).
 - The persons entitled to activate the Plan in section 4 should be reviewed and clarified. For example, does the term “public works” cover only the SCRCD public works, or does it also include the public works departments in Gibsons, Sechelt and the SIGD? Are other members of the SIGD, such as their Emergency Coordinator, entitled to activate the Plan?
 - There is no explanation of how the Plan is to be activated in either sections 3 or 4: no actual notification process is described.
 - Similarly, the process for activating the EOC also is not explained. Inferentially, one would call the Emergency Program Coordinator, who would then activate the EOC, but the process for activation should be expressly stated, along with a back up approach if the Coordinator is unavailable. As the Plan and EOC activation tie into section 3, which sets out the response levels under BCEMS, the two should be grouped together.
 - In relation to EOC activation, the Plan should note that the criteria for activation are identified in greater detail in section 8, in relation to specific hazards.
 - The portion of section 4 entitled “Initial Reports” suggests that the dispatch centres (E-Comm for fire and RCMP; EHS Dispatch for ambulance) would “contact the Sunshine Coast Emergency Program Coordinator” to report incidents that may warrant EOC activation. Unless this is built into the dispatch centre response protocols, or the dispatch centre is expressly requested by an incident commander to provide such an alert, it is unlikely that the dispatch centres would respond as contemplated. The Plan should be enhanced in this regard, and expressly provide that the Emergency Program Coordinator will work with the response agencies and corresponding dispatch centres to ensure that such notifications will occur when appropriate.
 - The Plan should expressly contemplate a list of “duty officers” and back-up contacts, each of whom is authorized to implement the Plan and activate the EOC, in the event that the primary contact is unavailable.

Resource Management – Section 5

Section 5 covers a range of administrative and EOC operational matters, in addition to dealing with Resource Management. A number of the sections involve EOC administration and operations, and would be better placed in the sections dealing with the EOC. In particular, the following matters should probably be moved:

- Information Flow/Direction – this section describes the types of information being created and/or exchanged in the BCEMS model, including the flow of information between the four different levels (Incident/Site; EOC/Site Support; PREOC; and PECC). If the separate resource management section is retained, the section dealing with “Resource Requests” could be retained in section 5.
- Personnel and Facility Identification – this portion deals with colour-coding and identification of the five different functional groups within BCEMS and would fit far better in the portion of the Plan which describes those functions (currently found in section 4).
- Documentation – this portion of section 5 deals with the location of blank EOC forms, the criticality of regularly maintained logs, the need for after-action reports, and the correct formats for time and dates on records.
- Information Tracking / Resource Requests – the first paragraph on p. 5-5, which deals with the need to record and track directions and decisions, should be moved into the EOC section. The remainder should be added to “Resource Requests” and can be left in section 5.
- Telecommunications – the telecommunications portion of section 5 can either be moved into the EOC section (which is the approach of the KBRD Plan), or could become a standalone section. In relation to radio communications, there should be a link from the Plan, or at least a note, directing users to the detailed information regarding emergency communications contained on the USB thumb drives (including combined event channels).
- The 2017 version of the Plan noted that a standalone communications plan was still “under development) (see p. 5-8). A public communications plan was developed later in 2017,⁴¹ but a formal plan that comprehensively addresses emergency communications (i.e., communications among emergency responders, and between an incident and the EOC, or between the EOC and external support agencies such as EMBC) has not yet been developed.

⁴¹ This plan – the *Sunshine Coast Emergency Response Information Plan* – is generally well-drafted. It includes a distribution list and a revisions list, and provides a solid approach to communicating with the public. Consideration should be given, however, to expanding the use and monitoring of social media as part of the overall approach that is applied. A mark-up of the Information Plan has been provided separately to SCRD staff.

- Risk Management – the portion of section 5 entitled “Risk Management” (pp. 5-13/14), also should probably be included in the EOC section. We would note that, of the six precedents reviewed, the SCRD’s Plan had the best and most comprehensive discussion of risk management principles as they apply to an EOC’s operations and a response to a major emergency.

Declarations and Evacuations – Section 6

The first part of this section deals first with the how declarations of a state of local emergency are to be made. It essentially sets out the pre-requisites and requirements as identified in the EPA, lists the principal authorizing statutes of each Local Authority and then flow charts out the decision-making process.⁴² This section should be amended and localized. The following issues should be addressed:

- the Plan should reiterate that each Local Authority (the SCRD in relation to the Electoral Areas, and Gibsons, Sechelt and the SIGD with regards to its respective jurisdiction) must independently declare a state of emergency. The power to declare a state of local emergency cannot be delegated;
- if an emergency threatens multiple jurisdictions simultaneously, or if there is a need for an intervening jurisdiction to declare a state of local emergency, a process for notification and coordination should be set out; and
- there should be a process by which the contents of each declaration and extension are reviewed by the Emergency Management Organization, to ensure that the delegation of powers and the powers matrices, are completed as required to address the event in question.

A blank form of declaration for each Local Authority is linked to the Plan and included with the thumb drives.⁴³ In relation to the declarations themselves, and the accompanying powers matrices, we would recommend that declarations include an express delegation of authority to the SCRD Emergency Management Organization and to the Emergency Program Coordinator. The slightly modified generic form of declaration which has been used is appropriate where a single jurisdiction, operating using its own resources, has made a declaration of local emergency. It is less appropriate where the personnel who will be effecting and managing the implementation of the powers, are actually drawn from multiple jurisdictions. Thus, in the declaration itself, it should clarify that the Emergency Program Coordinator and those working in the Emergency Management Organization are included in the phrase “servants and agents”. The attached powers matrix should be similarly modified. Note: the powers delegation needs careful review with external counsel.

⁴² The flow chart is difficult to read in the electronic version of the Plan.

⁴³ The materials include: a form of declaration for each jurisdiction; a form for extending a declaration; and a form for cancelling a declaration.

The section dealing with Evacuations will need review when the new *Fire Safety Act* comes into force. Under the *Fire Safety Act*, fire chiefs will have the authority to order “tactical evacuations” under section 13:

Tactical evacuations

13 (1) If a fire chief, or a person authorized by a fire chief, believes that there is an immediate threat to life due to a fire hazard or explosion, the fire chief or person authorized by the fire chief may evacuate a geographic area or premises.

As such, if an interface fire threatens an area, a local fire chief will have authority to require evacuation from such area even before the Plan is implemented or a local emergency declared.

Evacuation Routes/Modes: The Evacuation section does not link to or identify any specific evacuation routes, or modes of evacuation for a major emergency (other than a brief reference to using the Gray Creek forest service road, and, inferentially using boats for a possible marine evacuation). Both potential routes and modes of transport (including water and air) should be pre-planned, and links established to more detailed information on the thumb drives.

The Coast has a limited arterial road system, but an extensive network of forest service roads (in varying conditions). On two of the three thumb drives (2013 and 2018), a potential evacuation route along Gray Creek forest service road was identified for residents in the Sandy Hook – Tuwanek area.⁴⁴ A process of identifying alternative evacuation routes along the forest services roads should be considered, as well as guidelines for how such evacuations would be managed (including route marking, supervision, traffic management, etc.).

Similarly, there is some information on available marine resources which could be used to undertake evacuations by water. These resources should be identified at strategic locations up and down the coast.

Finally, in extreme situations, it may be possible to undertake limited evacuations using seaplanes or helicopters. Those resources need to be identified in the accompanying thumb drives.

There is some 2018 planning which has been done around the risks posed by the two arenas, with mapping showing evacuation zones ranging, in case of the Sechelt arena, from 100 to 700 m, and for the Gibsons arena, from 30 to 700 m.

There is a “single point of failure” at Chapman Creek, where only one bridge provides north-south access. That risk should be addressed as a specific hazard in section 8 of the Plan.

Evacuation Resources: The Plan should expressly link to more detailed lists identifying resources that may be required, if mass evacuations are required.

⁴⁴ One thumb drive had essentially nothing in the evacuation folder; the other had a more extensive collection of information.

Some resources are identified on two of the three thumb drives, though those lists are relatively dated. It is worth noting that the file on the thumb drive entitled “Inventory of Transit Resources” did not include the resources available from the Sunshine Coast Regional Transit System.⁴⁵

The location of Reception Centres which may be activated to receive evacuees should either be noted, or be expressly linked, in the Plan. Additionally, there should be some pre-planning of assembly points, based on different potential event types and locations.

Precedents: When updating this section, the following precedents provide useful content to consider:

- **KBRD Plan, s. 10** (note: the flow chart also should be considered, as it deals with some matters not covered by one in the SCRD’s Plan). On ESS, see: s. 8.47.
- **RDOS Plan, Annex B, Evacuation Guidelines**

Recovery – Section 7

The recovery section of the SCRD Plan compared well to the precedents reviewed. It provides a considered approach to developing recovery efforts as an integral aspect of the EOC’s management of the emergency response. Given the importance of the role played by ESS in any situation where the public may be displaced by an emergency, or in the recovery phase, during any period when infrastructure may have been impacted, we would suggest adding a section dealing with the role, importance and resources available to ESS.

One other area that may need attention is how responsibilities are allocated. Under the Plan, the EOC Director “is responsible for leading the overall recovery effort” (SCRD Plan, Part 7, p. 7-2). During the active response phase of a major emergency, this additional responsibility may not be manageable. Under the RDOS Plan, a Recovery Director can be appointed (RDOS Plan, Part 9 – Recovery). Consideration should be given to including the possible establishment of a “Recovery Director” in the SCRD Plan.

Hazard-Specific Plans – Section 8

[This portion of the Plan, which deals with specific operational matters, is being reviewed internally by Chief R. Michael]

Summary of Recommendations from the Plan Review

The following is a concise summary of the principal suggestions and recommendations related to the current form of the Plan and potential updating of same. These are provided as a guide, and should not substitute for a close reading of the review itself.

⁴⁵ The availability of such resources is noted on the “Vital Services Directory”, though not on the “Inventory of Transit Resources.”

Recommendations: The following are the principal recommendations and suggestions made with regard to revising and updating the current form of the Plan:

1. Add a section which tracks revisions;
2. Add a section which specifies how the Plan will be updated, by whom and with what frequency;
3. Add a formal distribution list covering internal and external stakeholders, including tracking the date of distribution;
4. Ensure that the Plan and all linked materials, are accessible by all authorized users (i.e., everyone to whom the Plan is formally distributed);
5. Update and localize the introductory section to more completely describe how the four local authorities are operating under and using the Plan;
6. Add a section describing in general terms the underlying legal authority for the Plan and how it operates within the framework of the EPA;
7. Add a section which describes in narrative form the role of the EOC and ICP in the overall context of BCEMS. This would replace the current, extended definitions of "Incident Command Post", EOC and PREOC;
8. Describe generally what supporting materials are needed to implement/operate the Plan and how they can be accessed;
9. Note that the HVRAs which have been prepared, were used to inform the development of the Plan.
10. Add a section dealing with training and exercises, covering both internal and external participants and stakeholders;
11. Add a section dealing with the Policy Group, its composition, functions and the criteria for its activation;
12. In relation to updates, the Plan should identify those matters which require frequent or on-going monitoring (e.g., contact lists, inventory/equipment lists, Vital Services Directory), and those which require less frequent updates (e.g., the HVRAs). We would recommend that contact lists be updated as required and checked at least semi-annually; resource and supply lists should be confirmed and updated annually; and that the Plan itself be updated as required and formally reviewed annually. The Vital Services Directory already calls for annual updates of that document.
13. The Sunshine Coast's formal HVRAs were completed in 2005. Consideration should be given to updating the existing HVRAs in the short-to-medium term (1-3 years).
14. Each Local Authority should undertake formal business continuity planning which can be integrated into the Plan.

15. In term of the existing Plan content:
 - a. add more discussion of how the EOC is activated;
 - b. expand the description of the demobilization processes;
 - c. add more on after-action reporting and post-event debriefings.
16. Resource Management (Section 5): various portions of this section 5 probably should be built into the section dealing with the EOC.
17. Emergency Communications: While there is a well-developed 2017 communications plans for dealing with the public, a formal and comprehensive emergency communications plan (i.e., communications among emergency responders, and between an incident and the EOC, or between the EOC and external support agencies such as EMBC) needs to be developed.
18. Emergency Declarations: Section 6 deals, in part, with Emergency Declarations by the Local Authorities. This section should:
 - (a) reiterate that each Local Authority must separately declare a state of local emergency (as this power cannot be delegated);
 - (b) provide a process for coordinating declarations among the Local Authorities; and
 - (c) provide a process by which the EMO reviews the declarations before they are issued. We also would recommend that each declaration clearly delegate powers to the EMO and individuals at the EOC.
19. Evacuation routes: in relation to the possibility of a major emergency (e.g., interface fire), a more formal identification of evacuation routes and modes of evacuation for different areas of the Sunshine Coast needs to be undertaken. This will require examining both the forest service road network for viable alternative routes and a closer examination of potential marine evacuations (which, in turn, will require the maintenance of an up-to-date list of available marine-capable resources and their expected locations).
 - (a) Chapman Creek crossing: there is a single point of failure at Chapman Creek for north – south transportation on the Sunshine Coast.⁴⁶ If this crossing is compromised, the ability to transport emergency response and other resources will be affected, and potentially could affect evacuation considerations. This risk should be added to section 8 of the Plan.
 - (b) Resources: the resources available for evacuations (e.g., transit, water, air) also need to be better identified and more consistently updated.

⁴⁶ There may be a forest service road route that enables this problem to be bypassed – but the route is very long, and its maintenance and accessibility is far from certain.

- (c) Reception centre locations and alternatives need to be identified or linked to the Plan. There are reception centre sites listed on the thumb drives, but the Plan itself does not link to that listing.

20. Recovery:

- a. A section should be added discussing the role of ESS in mitigating the effects of emergencies on members of the public who may be displaced; and
- b. Consideration should be given to how responsibility for recovery efforts is allocated during a major emergency. The Plan indicates that the EOC director is responsible for these efforts – during a major emergency this may prove impractical. Consideration should be given to establishing a role for a “Recovery Director” in the Plan.

8. Supporting & Implementing Materials

Supporting materials are found either on the SCRD Network (to which limited access is granted) or on the thumb drives. Initially, the Consultants were provided with two thumb drives by the CAO. We understand that these were drives that she expected to be able to use in the event of an emergency and had been provided to her by the Emergency Program Coordinator. Although there are no external markings on the drives themselves, internally it is clear that they date from 2011 and 2013, respectively. As noted in the introductory sections, during the review of the standalone laptop and EOC position kits, we identified a 2018 version of the thumb drive, which also was examined.

The organization, layout and contents of the thumb drives should be substantially overhauled:

- The date of the drive should be externally marked, so that users are immediately aware of whether they are using a current form or not;
- The overall file structure and organization needs to be reviewed. The existing file structure appears to be largely random, and documents are frequently duplicated. Ideally, the file structure would clearly track the Plan itself, so that all materials related to a particular aspect of the Plan would be readily identifiable. Any additional supplementary materials should be separately organized and ordered;
- There is a great deal of extraneous or dated material on all three thumb drives (e.g., 2006 / 2007 pictures of the arrival of the 200-bed emergency hospital; receipts for equipment or apparatus purchased, etc.). These materials need to be culled to reduce clutter and confusion;
- In terms of content:
 - each of the files must be up to date. Where a document (e.g., an inventory list) has not changed, it must still be given a refreshed date so that a user can be confident that it has been checked;

- the content must be well organized and relevant;
- the content must be as comprehensive as possible (e.g., see the comments above regarding inventory of transit resources on the Coast);
- extraneous materials need to be culled; and
- it must be in a readily readable format.

In relation to the latter point, some of the materials (specifically the RCMP emergency plans, which appear to be in Word Perfect format) were in a format that was not immediately readable (though they could be converted). A standard should be established (e.g., using MS Office or MS Office-compatible files; or Adobe PDF files) for information which is collected and disseminated on the thumb drives and when a document is placed on the thumb drive, it should already be converted into the agreed format.

Each position within the EOC has a standalone kit box, which is stored near to the primary EOC at the SCRD offices on Field Road. We were advised that similar kit boxes were also available at the auxiliary EOCs. We reviewed the EOC Director's kit box: some of the materials were outdated (e.g., a 2015 hard copy version of the Plan), and although each box is supposed to have a thumb drive, these were actually stored separately. There was an EOC activation sequence document, and an up-to-date (2018) emergency contact list. The box also included a number of generic EMBC documents, some blank forms of Emergency Declarations for each Local Authority, and a copy of the 2017 Emergency Communications Plan.

The standalone laptop, which contained the 2018 draft version of the Plan, is an older machine, with a complex file structure. It would be challenging to find all of the necessary materials and consideration should be given to developing a more accessible file structure on the laptop.

Recommendation: Review and update the contents and organization of the thumb drives. Remove extraneous material. Provide an external date on each thumb drive and track their distribution.

Recommendation: Review with SCRD IT staff whether a single back-up laptop is a sufficiently resilient approach to the risk of network connectivity loss. This review will need to consider the challenges of keeping more than one back-up laptop up-to-date.

Recommendation: Review the file structure and layout of the standalone laptops, to ensure that the materials on them are readily accessible.

9. Administration and Organization

Budget

Under SCRD Bylaw No. 1041, the maximum taxation rate for the emergency planning service is \$0.10 per \$1,000 of assessed value. The aggregate annual levy for the service over the period from 2016 – 2018, has been as follows:

	2016	2017	2018
Net Taxes Levied	\$261,905	\$249,539	\$237,420
Maximum Limit	\$852,512	\$1,042,807	\$1,209,156

As can be seen, the budget for the service has declined in absolute terms over the past three years. For residential homeowners, the service in 2018 cost 1.75¢ per \$1000 of assessed value.

Emergency Program Coordinator Position

The most recent version of the job description for the EPC role (2016), states the responsibilities as follows:

- To provide leadership, training, support, recruitment, mentoring, supervision and termination to SCEP volunteers and applicable SCRD staff and others.
- To supervise 100+ volunteers, Administrative Assistant, Community Services and Communications Officer (jointly).
- Experience recruiting and co-ordinating volunteer groups, facilitating group learning and making presentations.
- Exercises on-going independent judgement to determine the best means of achieving SCEP objectives and in the interpretation of applicable legislative and bylaw requirements.
- Makes day to day decisions involved in running the program and in the security and maintenance of supplies and equipment and volunteers.
- Makes budgetary decisions within limits established by SCRD and legislation.
- Ability to provide leadership to multi-disciplinary groups, including elected officials, committees, volunteers and the public in high pressure situations.
- Volunteer groups successfully recruited, supervised and coordinated.

SUPERVISORY RESPONSIBILITIES

- Lead, train, support, recruit and terminate up to 100+ volunteers, Administrative Assistant, Community Services and Communications Officer (jointly)
- Coordinate and supervise during emergencies: numerous staff (volunteer and applicable SCR D employees).
- Required to work some weekends and evenings as responsibilities dictate.
- On Call 24/7

The job description and requirements are broad, and include recruitment, termination and supervision responsibilities. Considerable authority is vested in the EPC role though SCR D Bylaw No. 564. As noted in section 4, above, other regional districts that we examined – RDFFG, KBRD, Cariboo RD, TNRD and RDOS – have established this role as an exempt position. As such, we recommend that the position be reviewed.

In the Fire Services Report, we have recommended that the SCR D contemplate combining the responsibilities of this position with that of a fire services coordinator (which also, typically, is an exempt role).

Recommendation: Review the EPC role and consider whether it properly should be an exempt position. If the role is to be combined with that of a “fire services coordinator,” then those responsibilities also would need to be factored into such a consideration.

Volunteers

As noted in the Overview section, the SCR D Emergency Program is highly dependent on its volunteers for the delivery of time-impacted and life-critical services. Proper management and on-going support for these volunteers and (if relevant) their related organizations is critical if the SCR D and the other local authorities are to be able to deliver an effective response to, and properly manage the recovery from, any major incident.

In relation to volunteer issues, some of the approaches enunciated in the contemporaneously-delivered Fire Services Report regarding recruitment and retention issues, should also be taken into account when working with the volunteers who support the operation of the SCR D's Emergency Program. In particular:

- the SCR D should proactively assist the volunteer agencies in their recruitment efforts; and
- all four Local Authorities should participate in and/or organize, recognition events for the volunteers.

In relation to recruitment efforts, consideration should be given to trying to attract new members to the volunteer ranks. We note that there may be an opportunity to work with SD 46, and

develop a program that enables high school students to fulfil their Community Service requirements by working as a volunteer with one of the volunteer groups (e.g., ESS). By providing training to the students and involving them directly in working with the Emergency Program, the SCRD would be able to:

- educate youth on emergency preparedness (which they, in turn, may well take home to their families);
- provide training to youth in relation to emergency preparedness and emergency responses; and
- potentially create a group of new volunteers who would, in time, step up to support the delivery of the Emergency Program.

Recommendation: The SCRD should, in consultation with its volunteer organizations, determine whether it would be possible to partner with SD 46, and develop programs which enable students to complete their Community Service requirements, by volunteering with some aspect of, or volunteer organization associated with, the Emergency Program.

Other Organizational Issues

The principal stakeholders who participate in or would be activated during a major emergency - including the emergency response agencies, SAR, ESS, and participants from the utilities – meet almost monthly to review issues relevant to the SCRD Emergency Program. As part of the update of the Emergency Program, it may be timely to review with the participating stakeholders as to whether the existing monthly meeting structure should be revised – in terms of content of those meetings, frequency and reporting out.

In addition, as noted in the review and analysis of the bylaws, an “Emergency Executive Committee” is supposed to exist, which provides senior oversight of the program. As the Emergency Program is refreshed, and its bylaws updated, consideration should be given to whether the EEC is necessary and if not, whether another oversight function should be formally specified.

Recommendation: Review with the external stakeholders whether any changes to the existing approach of having monthly meetings should be revised or changed – including as to content, frequency or reporting out.

Recommendation: As the Emergency Program is refreshed and its bylaws updated, consideration should be given as to whether the EEC should be reinstated, or another oversight function formally specified.

10. Summary of Recommendations

The following is a listing of the recommendations made throughout this report. There are 12 major recommendations on various issues affecting the Emergency Program, plus some 19 recommendations on updating or revising the current form of the Plan.

Section 4: Summary Assessment of the SCRD's Emergency Program

1. **Recommendation:** Ensure that training is provided or made available to staff from each of the participating Local Authorities and appropriately tracked.
2. **Recommendation:** Each of the participating Local Authorities needs to develop and maintain a business continuity plan. That plan should be integrated into the SCRD Emergency Program.

Section 5: Statutory, Regulatory and Bylaw Review

3. **Recommendation:** The SCRD should, in consultation with the three other Local Authorities, review and update each of its relevant bylaws: SCRD Bylaw No. 1041, SCRD Bylaw No. 564, and SCRD Bylaw No. 565. While there are a number of areas where inconsistent terms are used that should be corrected, the most critical updates relate to the following:
 - (c) The role of the EEC: If that committee is to be retained, it needs to be reactivated. Alternatively, whatever new process is agreed for managing the responsibilities set out in section 5 of SCRD Bylaw No. 564 needs to set out in the updated bylaw; and
 - (d) The process by which the Plan is updated and changes approved needs to be explicitly set out. We also would recommend that the frequency of formal reviews of the Plan be set out in either the bylaw or in Board policy.
4. **Recommendation:** Each of other Local Authorities will need to review and update their respective bylaws to address certain inconsistent terms and to track any changes made by the SCRD in accordance with the previous recommendation. In addition, each of the other Local Authorities should consider expressly noting, in operative provisions in their respective bylaws, that they are adopting the Plan (as it may be amended from time to time) as the emergency plan for their respective jurisdictions, and that the EMO established under SCRD Bylaw No. 1041 constitutes the EMO for their jurisdiction as well. There also should be a clear statement that when powers are delegated as contemplated by the EPA, they are being delegated to the EMO.
5. **Recommendation:** The improvement districts which operate the Sechelt and Pender Harbour fire departments, respectively, should be formally added to the EMO. We would recommend this be undertaken through a contractual arrangement. This contract, in addition to formally adding the improvement districts, also could be used to address other issues such as how training and exercises will be managed, the process for coordinating declarations of emergency and the delegation of powers when required.

Section 6: Current Form of the Plan

6. The following is a concise summary of the principal suggestions and recommendations related to the current form of the Plan and potential updating of same. These are provided as a guide, and should not substitute for a close reading of the review itself.

Recommendations: The following are the principal recommendations and suggestions made with regard to revising and updating the current form of the Plan:

1. Add a section which tracks revisions;
2. Add a section which specifies how the Plan will be updated, by whom and with what frequency;
3. Add a formal distribution list covering internal and external stakeholders, including tracking the date of distribution;
4. Ensure that the Plan and all linked materials, are accessible by all authorized users (i.e., everyone to whom the Plan is formally distributed);
5. Update and localize the introductory section to more completely describe how the four local authorities are operating under and using the Plan;
6. Add a section describing in general terms the underlying legal authority for the Plan and how it operates within the framework of the EPA;
7. Add a section which describes in narrative form the role of the EOC and ICP in the overall context of BCEMS. This would replace the current, extended definitions of "Incident Command Post", EOC and PREOC;
8. Describe generally what supporting materials are needed to implement/operate the Plan and how they can be accessed;
9. Note that the HVRAs have been used to inform the development of the Plan.
10. Add a section dealing with training and exercises, covering both internal and external participants and stakeholders;
11. Add a section dealing with the Policy Group, its composition, functions and the criteria for its activation;
12. In relation to updates, the Plan should identify those matters which require frequent or on-going monitoring (e.g., contact lists, inventory/equipment lists, Vital Services Directory), and those which require less frequent updates (e.g., the HVRAs). We would recommend that contact lists be updated as required and checked at least semi-annually; resource and supply lists should be confirmed and updated annually; and that the Plan itself be updated as required and formally reviewed annually. The Vital Services Directory already calls for annual updates of that document.

13. The Sunshine Coast's formal HVRAs were completed in 2005. Consideration should be given to updating the existing HVRAs in the short-to-medium term (1-3 years).
14. In term of the existing Plan content:
 - a. add more discussion of how the EOC is activated;
 - b. expand the description of the demobilization processes;
 - c. add more on after-action reporting and post-event debriefings.
15. Resource Management (Section 5): various portions of this section 5 probably should be built into the section dealing with the EOC.
16. Emergency Communications: While there is a well-developed 2017 communications plans for dealing with the public, a formal and comprehensive emergency communications plan (i.e., communications among emergency responders, and between an incident and the EOC, or between the EOC and external support agencies such as EMBC) needs to be developed.
17. Emergency Declarations: Section 6 deals, in part, with Emergency Declarations by the Local Authorities. This section should:
 - (d) reiterate that each Local Authority must separately declare a state of local emergency (as this power cannot be delegated);
 - (e) provide a process for coordinating declarations among the Local Authorities; and
 - (f) provide a process by which the EMO reviews the declarations before they are issued. We also would recommend that each declaration clearly delegate powers to the EMO and individuals at the EOC.
18. Evacuation routes: in relation to the possibility of a major emergency (e.g., interface fire), a more formal identification of evacuation routes and modes of evacuation for different areas of the Sunshine Coast needs to be undertaken. This will require examining both the forest service road network for viable alternative routes and a closer examination of potential marine evacuations (which, in turn, will require the maintenance of an up-to-date list of available marine-capable resources and their expected locations).
 - (d) Chapman Creek crossing: there is a single point of failure at Chapman Creek for north – south transportation on the Sunshine Coast.⁴⁷ If this crossing is compromised, the ability to transport emergency response and other resources will be affected, and potentially could affect evacuation considerations. This risk should be added to section 8 of the Plan.

⁴⁷ There may be a forest service road route that enable this problem to be bypassed – but the route is very long, and its maintenance and accessibility is far from certain.

- (e) Resources: the resources available for evacuations (e.g., transit, water, air) also need to be better identified and more consistently updated.
- (f) Reception centre locations and alternatives need to be identified or linked to the Plan. There are reception centre sites listed on the thumb drives, but the Plan itself does not link to that listing.

19. Recovery:

- a. A section should be added discussing the role of ESS in mitigating the effects of emergencies on members of the public who may be displaced; and
- b. Consideration should be given to how responsibility for recovery efforts is allocated during a major emergency. The Plan indicates that the EOC director is responsible for these efforts – during a major emergency this may prove impractical. Consideration should be given to establishing a role for a “Recovery Director” in the Plan.

Section 8: Supporting and Implementing Materials

- 7. **Recommendation:** Review and update the contents and organization of the thumb drives. Remove extraneous material. Provide an external date on each thumb drive and track their distribution.
- 8. **Recommendation:** Review with SCRD IT staff whether a single back-up laptop is a sufficiently resilient approach to the risk of network connectivity loss. This review will need to consider the challenges of keeping more than one back-up laptop up-to-date.
- 9. **Recommendation:** Review the file structure and layout of the standalone laptop, to ensure that the materials on it are readily accessible.

Section 9: Administration and Organization

- 10. **Recommendation:** Review the EPC role and consider whether it properly should be an exempt position. If the role is to be combined with that of a “fire services coordinator,” then those responsibilities also would need to be factored into such a consideration.
- 11. **Recommendation:** The SCRD should, in consultation with its volunteer organizations, determine whether it would be possible to partner with SD 46, and develop programs which enable students to complete their Community Service requirements, by volunteering with some aspect of, or volunteer organization associated with, the Emergency Program.
- 12. **Recommendation:** Review with the external stakeholders whether any changes to the existing approach of having monthly meetings should be revised or changed – including as to content, frequency or reporting out.

13. **Recommendation:** As the Emergency Program is refreshed and its bylaws updated, consideration should be given as to whether the EEC should be reinstated, or another oversight function formally specified.

11. Glossary of Defined Terms

The following is a list of the principal defined terms and acronyms used in the report:

“**AGLG Report**” means the Auditor General for Local Government’s report, *Improving Local Government Emergency Management: Considerations for Local Government Council and Board Members* (April 2018);

“**BCEMS**” means the provincially-established BC Emergency Management System;

“**CAO**” means Chief Administrative Officer;

“**Consultants**” means Dave Mitchell & Associates Ltd.;

“**EEC**” means the Emergency Executive Committee required to be established under SCRD Bylaw No. 564;

“**EHS**” means BC Emergency Health Services;

“**Emergency Program**” means the SCRD’s emergency program established in accordance with the requirements of the EPA

“**EMO**” means the Emergency Management Organization or Emergency Measures Organization established as part of the SCRD’s Emergency Program;

“**EOC**” means the Emergency Operations Centre, which is activated to support responses to larger or more complex emergency incidents;

“**EPA**” means the *Emergency Program Act* (B.C.);

“**EPC**” means the SCRD’s Emergency Program Coordinator;

“**Fire Service Review**” means the separate but contemporaneous review of the SCRD’s four fire services conducted by the Consultants;

“**Gibsons Bylaw No. 1030**” means *Town of Gibsons State of Local Emergency Bylaw No. 1030, 2006*, which is the bylaw that authorizes Gibsons to declare a state of local emergency and to operate under the Emergency Program;

“**HVRA**” means the hazard, vulnerability and risk analysis conducted in 2005-06 to assess the risks present in each of the communities on the Sunshine Coast;

“**ICP**” means an incident command post as contemplated by BCEMS;

“**KBRD**” means Kootenay Boundary Regional District;

“**Local Authorities**” means each of the SCR D, Gibsons, Sechelt and the SIGD;

“**PECC**” means Provincial Emergency Coordination Centre;

“**PG**” means the City of Prince George;

“**Plan**” means the SCR D’s emergency plan, which sets out the Emergency Program and the process for implementing an emergency response;

“**PREOC**” means the Provincial Regional Emergency Operations Centre;

“**PRRD**” means Peace River Regional District;

“**RDCK**” means Regional District of Central Kootenay;

“**RDN**” means Regional District of Nanaimo;

“**RDOS**” means Regional District of Okanagan-Similkameen;

“**SAR**” means Search and Rescue;

“**SCR D**” means Sunshine Coast Regional District;

“**SCR D Bylaw No. 1041**” means *Sunshine Coast Regional District Emergency Measures Service Establishing Bylaw No. 1041, 2001*;

“**SCR D Bylaw No. 564**” means *Sunshine Coast Regional District Emergency Measures Plan and Administration Bylaw No. 564, 2005*;

“**SCR D Bylaw No. 565**” means *Sunshine Coast Regional District Local Emergency Bylaw No. 565, 2005*;

“**Sechelt Bylaw No. 319**” means *District of Sechelt State of Local Emergency Bylaw No. 319, 2005*;

“**SIGD**” means the Sechelt Indian Government District;

“**SIGD Bylaw**” means *Sechelt Indian Government District State of Local Emergency Bylaw (Sunshine Coast) Law No. 2007-01*;

“**SIGD Manual**” means the Sechelt Indian Government District’s draft *Emergency Plan and Procedures Manual*; and

“**TNRD**” means the Thompson-Nicola Regional District.