

FROM

NAME & TITLE

Robert Maloney, Director

AGENCY NAME & ADDRESS

Mayor's Office of Emergency Management

SUBJECT

City of Baltimore Council Bill 16-0621

**MEMO**



TO

Ms. Angela Gibson  
City Council Liaison  
Mayor's Office of Government Affairs

DATE: October 27, 2016

City of Baltimore Council Bill 16-0621 was introduced in January of 2016 and calls for the requirement of the City of Baltimore to conduct a health impacts assessment and a risk assessment of the transport of crude oil by rail. Specifically, this bill requires the Mayor's Office of Emergency Management (MOEM) to complete a risk assessment that addresses six core elements of the transportation of oil by rail. Further, the bill outlines a framework for conducting the evaluation with an academic affiliation as well as an advisor from a school of public health. The overarching purpose of the bill as it relates to MOEM requiring the City to update, periodically study and report on the City's incident response plans as they relate to the transport of crude oil by rail.

The City of Baltimore is a major metropolitan city and a critical link in the supply chain node to the east coast corridor and the rest of the nation. Every day, by rail, by truck, and by ship, hundreds of thousands of gallons of hazardous chemicals, gasses, and solids pass through our city.

Performing a comprehensive risk assessment for each of type of hazardous cargo would require a considerable amount of financial and human capital. The subject bill proposes to perform a detailed assessment and plan for one type of product. A more reasonable approach to best analyze these threats is by investing in the various threats and hazards that present a significant risk to the community. We currently assess these threats by conducting annual all-hazards assessments that are used to guide our investments in preparedness efforts to prevent, mitigate, respond, and recover from any number of potential scenarios.

Currently, MOEM conducts a comprehensive, all-hazards approach in our efforts to prevent, protect, mitigate, respond, and recover from any human-made, natural, or technological event. Our emergency management program is accomplished not in a silo, but through our collaboration with stakeholders both public and private and cutting across multiple public safety disciplines both internal and external to the City. These efforts also include cross-referencing our planning and asset investments with jurisdictions that share a common border with the City. This whole community approach allows MOEM to recognize the critical role both traditional and non-traditional stakeholders play in addressing our preparedness capabilities related to all threats and hazards, including the transportation of hazardous materials.

The planning efforts undertaken by MOEM are wide-ranging, but are tailored to very specific high-impact scenarios, which allow the City to determine what capabilities are needed to prepare for all hazards. This planning effort includes determining what resources are required, and what the current gaps are. Through our Threat and Hazard Identification and Risk Assessment (THIRA), a report MOEM prepares annually; the City uses data mined from our stakeholders to

help efficiently build and sustain preparedness capabilities. The THIRA serves as a roadmap for implementing and carrying out those capabilities in which we have invested. Through the THIRA process, the City (as well as our neighboring jurisdictions) follows a four-step process: Identify the threats and hazards of concern, give the threats and hazards context, establish capability targets, and finally, apply the results. Through this process, the City can identify what investments have made, continue to be made, and what gaps still exist across the elements of planning, organization, equipment, and training and exercise. Specifically, the THIRA defines these resources and gaps in critical core capabilities including, but not limited to planning, public information and warning, supply chain integrity and security, operational coordination, risk and disaster resilience, threats and hazards identification, environmental response, health and safety, and fire management and suppression.

The City's systematic and comprehensive approach allows us to continuously review the evolving threat environment, and reinforce our efforts to best prepare and protect the communities we serve. Requiring the City to perform risk assessments on one unique concern is not consistent with our current operational framework, is inefficient and ineffective, and will have an immediate impact on how we can deliver the highest level of public safety service to our community.

In conclusion, City resources are scarce, and our agencies are expected to provide more services with fewer resources than ever before. To secure the \$150,000 to \$300,000 of funding required to complete an assessment for one hazard, the City would be forced to sacrifice critical services we already struggle to maintain. Further, the human capital investment to focus on one risk is counterproductive to our overarching mission of maintaining the highest level of public safety the City and our communities expect.