

**Analysis of Comments on Service Description Document Titled “Proposed
Enhanced Impact-Based Decision Support Services for the Emergency Management
Community Supporting Events/Incidents Impacting Safety of Life and Property”**
(Collected May – September 2013)

Background

On May 24, 2013, the National Weather Service (NWS) released for public comment a Service Description Document (SDD), titled “*Proposed Enhanced Impact-Based Decision Support Services for the Emergency Management Community Supporting Events/Incidents Impacting Safety of Life and Property.*” The comment period was May 24 – September 23, 2013.

NWS sought comments on the proposed service enhancement in fulfilling the requirements of the National Oceanic and Atmospheric Administration’s Policy on Partnerships in the Provision of Environmental Information. Public comments allow NWS to better understand the impacts of the proposed policy on other members of the environmental information enterprise (i.e., government, private sector, academia) and the general public.

NWS sought comments directly through issuance of an NWS [Public Information Statement](#) (also available to the public via webpage) and announcement through an American Meteorological Society (AMS) listserv. A total of 13 sets of comments were received. Comments were received from individuals in the private sector (11) and NOAA/NWS (1). (One commenter was of unknown affiliation.) A copy of the comments received is provided in the Appendix.

The SDD described NWS’s impact-based decision support services (IDSS) provided for the protection of life and property to officials that serve within the NWS-defined Emergency Management (EM) community. It provided details on who will be provided IDSS, described Types (currently referred to as Tiers) of service that will be provided and related the NWS service to the DHS/FEMA National Response Framework which provides an overarching framework for preparedness and response activities both within the EM community and the general community at large.

The comments in general recognized the need for NWS to provide support to the EM community (as NWS has always done). However, many comments expressed a strong concern that NWS was proposing to expand the scope of our current service to a broader community and proposing a level of service that is not sustainable given the current budget environment and represents a significant threat to the private sector and the services they provide. An analysis of comments is provided below.

Analysis of Comments

Grouping the comments into major categories results in the following areas of concern, along with a response to the comment/concern:

1. Scope of support - Many reviewers perceived an expansion of the scope of the EM community that NWS was proposing to provide with IDSS, especially into areas served by the private sector. This included concern over:
 - a. Definition of EM community including any entity that may be engaged to resource any National Response Framework (NRF)-identified Emergency Support Function (ESF) (which may include for-profit business entities in transportation, communications, logistics management and energy—all areas served by private sector weather providers).
 - b. Level of support for large gatherings/special events
 - c. Level of support for state/local DOTs
 - d. Level of support for universities and other large entities
 - e. Ability of EM community to redistribute products provided to them by NWS

Response: (a) NWS agrees that the wording in Section B of the SDD incorrectly suggested an expansion of the scope of the NWS definition of EM community. We have revised the document to clearly indicate that NWS will be providing support to government operations of NRF-defined ESFs. While other entities who are not members of the EM community may be present while NWS is providing support to the EM community, our support provides a common level of awareness and knowledge on the nature and timing of relevant weather events to inform response and recovery efforts of the EM community. NWS will not provide tailored advice to non-EM community entities on areas such as impacts of weather, how to expedite restoration activity, and how to mitigate for hazardous weather in the future. Specific weather guidance and information beyond that provided to the EM community is best be served utilizing America's Weather and Climate Industry (AWCI).

(b) Regarding support for large gatherings/special events, in general, NWS supports those events/incidents where support is requested by the EM community. Policy on NWS support for special events is provided in [NWSI 10-1806](#). This policy document provides additional information describing the level of support provided by NWS to the EM community supporting these events and the relation to support provided by private sector weather service providers. In general, NWS does not nor do we plan to provide direct support for every event where there is a large gathering (other than National Special Security Events (NSSE) as designated by the President, or his representative, the Secretary of the Department of Homeland Security). By request, NWS also may provide support for EMs who are deployed at particular events to ensure public safety. NWS does not directly support event coordinators or venue operators. NWS does maintain situational awareness of large gatherings within their forecast area of responsibility so that the public can be effectively warned in the event of hazardous weather conditions. Reference to this policy has been included in the revised SDD.

(c) NWS policy for support of state/local DOTs was coordinated with AWCI and presented as a guidance statement in 2009 – see <http://www.nws.noaa.gov/sp/dotssupportguidance.pdf> NWS support of state/local DOTs focuses on our expertise and understanding of the evolution and timing of hazardous weather events. The NWS does not have specialized expertise in forecasting surface/pavement conditions of roads, nor does NWS have the expertise to assess road treatment options. These types of comprehensive services, e.g., supporting winter road maintenance decisions, are available from AWCI, including customized consulting services to provide value-added information or, in other words, information which goes beyond the strict provision of information related to expected weather conditions as it relates to travel safety. NWS support focuses on the safety of the traveling public. NWS is not trying to make changes to any existing valuable partnerships between DOTs and private weather service providers and is willing to coordinate with any DOT in-house meteorologists, or contracted private weather services to ensure messaging by surface transportation agencies and NWS is consistent. Reference to this policy has been included in the revised SDD.

(d) NWS does not plan to support every university or large entity. We take a functional approach to the definition of EM community. Some large universities or other large entities (e.g., Walt Disney World) exercise an emergency management function equivalent to that provided by small cities/towns and are recognized as such by State government. We will work with emergency managers of those entities that are responsible for the safety of individuals within their jurisdiction. NWS has successfully applied this definition when limiting use of NWSChat to members of the EM community.

(e) In accordance with NOAA’s Partnership Policy, NWS does not intend our products/services to interfere with those that are being provided by AWCI. However, the large majority of NWS data/products are in the public domain and restricting redistribution would be difficult from a legal sense. Furthermore, the Stafford Act mandates that “Federal Agencies provide technical assistance to state and local governments to ensure timely and effective disaster warning is provided.”

2. Role of AWCI - Comments indicated that while AWCI has a long history of providing tailored services to the EM, the SDD did not adequately reflect the role of AWCI in supporting the EM community. Commenters stated that NWS should also consider using established services from private industry rather than creating new products/services to support the EM community. In addition, while the SDD indicates that NWS will coordinate with AWCI service providers, comments expressed concern that no protocol exists for this coordination and such interaction in an emergency situation may cause confusion.

Response: The SDD is meant to describe services provided by NWS. As is current practice, NWS envisions being available to support emergency managers, staff meteorologists, or their contracted private weather providers, to the extent requested

by the emergency manager. The SDD is not intended to describe in detail services provided outside of NWS. We have made an effort in the revised SDD to more clearly identify the role of others in the weather enterprise in supporting the EM community as well as to describe the intended focus of NWS support (support of government EM response operations) versus support areas which should be referred to AWCI. The revised SDD also includes descriptive scenarios that portray the role of AWCI in providing this critical support.

NWS recognizes the critical importance of AWCI support to the EM community in helping to build a Weather-Ready Nation. We believe that coordination of services with AWCI leads to more consistent messaging that is essential to an effective warning system. Upon request of the individual in charge of the command structure that NWS is supporting, NWS will provide an opportunity for coordination (e.g., set up an NWSChat room for the incident/event). To the extent possible, opportunities and means of coordination will be defined in the planning stages of response efforts and are certainly subject to the ability and willingness of others involved for participation.

As NWS develops new products/services there is always a chance to assess whether the effort should be done internally or purchased from existing services. While NWS does not contract out its forecaster duties, we continue to look at valuable technology marketed by AWCI and we continue to integrate both observations and model output provided external to NWS into our operations. This issue is not addressed within the scope of the SDD.

3. Budget concerns - Several reviewers expressed concerns that creating the new/expanded services described in the SDD has the potential to erode NWS's ability to provide and improve both general warning services to the public and NWS's foundational data sets, especially in an era of shrinking budgets.

In addition, comments suggest that including the statement in the SDD "*NWS aims to provide an equitable level of support to all such entities in the group described in Section B. However, local office management will continue to have the discretion to evaluate resources to determine how to most effectively support multiple requests for support, especially during large-scale events with wide-spread impact.*" creates uncertainty about what level of service is provided to the EM community and when. Commenters believe this will negatively impact support provided to EM community both by NWS and AWCI. According to comments, if a particular level of service from NWS cannot be guaranteed, the EM community can't effectively plan for emergency operations because not only can't they depend on the service from NWS, but they can't effectively contract with a company from AWCI and may be left unsupported.

Response: We understand the concern that increased attention on decision support activities might imply reduced efforts on development/enhancements to foundational

data produced by NWS (e.g. our numerical weather model results or our radar observations) or other services provided by our forecasters. Based both on elements of our past experience and technical aspects of the federal budget, NWS does not believe that our users will experience any degradation in current or planned future improvements to these key service areas.

When NWS was proposing to implement NWSChat (service which allows online instant-messaging coordination with our core partners) similar concerns were expressed -- that the time spent by our forecasters on this type of coordination would detract from standard warning preparation activities and operations within the office. In reality, use of NWSChat has been a huge success, both for our core partners and for NWS. NWS warning preparation activities overall have benefitted immensely from the input provided by NWSChat participants and coordination among the NWSChat users has served to add critical consistency to messaging provided to the public from NWS, emergency management community, the media, and other providers of weather services.

Regarding the federal budget -- there are very real limitations on the NWS ability to transfer resources between these functions. Unlike personal budgets or the funds available within a private company, funds appropriated to federal agencies, including NWS, must be spent on a bona fide need related directly to the purpose for which the funds are appropriated. The current NWS budget is appropriated in over a dozen of these categories, and it is illegal for NWS to spend money appropriated for one category on a purpose served by another category. NWS has also been very public in its intent to adopt a simpler, and more functional, structure for future budgets, which will make it even more difficult to "dilute" spending on foundational data.

NWS support for the emergency management community (as well as all others who NWS supports) has always been subject to availability of resources. Because NWS managers are legally bound to limit spending to the appropriations provided within a given year's federal budget, they will always require the ability to adjust operational activities to ensure NWS is not spending funds it doesn't possess. This statement DOES NOT reflect any change in the level of service we have and plan to provide to the EM community.

4. Product/service enhancements - Comments indicate that custom products and especially those created on the fly create serious concerns regarding both consistency and transparency. There is concern that forecasts provided by on-site meteorologists may differ from the official forecast and customized products/services will lead to lack of consistency across the country. In addition, reviewers questioned how they would have an opportunity to provide input on these new products as we have in the past, per NOAA's Partnership Policy. Comments suggest that in the interest of transparency, these products should be made available to everyone via standard dissemination media.

Response: Training for NWS staff who will be deployed on-site to support emergency managers includes an emphasis on the need for coordination with in-office forecasters and the need for consistency with the local forecast provided to the public. Consistent messaging is essential to an effective warning system. The official forecast for any event will continue to be produced by the local WFO supporting the event and will be consistent with the locally produced NDFD.

NWS staff supporting the EM community for a particular event/incident may need to create a particular product/display that best meets the needs of the EM supporting that event/incident. If it is envisioned that the product/service will be provided on a regular basis to support the EM community (e.g., it is felt that a particular product/service should be regularly produced for all such incidents) then that product/service would be subject to the same change control procedures within NWS and would go through public comment/review prior to becoming operational. Our internal change control procedures aim for consistency in the services implemented across NWS, unless the capability is designed to meet a unique local need. The standard change procedures for new/enhanced products and services in NWS is available at [NWSI 10-102, New and Enhanced Products/Services](#), and provides the transparency consistent with [NOAA's Partnership Policy](#).

NWS cannot commit to making these ad hoc products publicly available using standard dissemination media. Although rare, there are instances where security concerns may prohibit widespread distribution of the information. When the need to protect life and property requires emergency dissemination, to a broader audience, of NWS information in a form other than an official product/service, NWS may use other dissemination methods (e.g., web, NWSChat, social media) to make the information available. (Continued provision of such ad hoc products would be subject to standard NWS change procedures as discussed above.)

5. Clarity on what has changed – Comments suggest that while the SDD states that the NWS has a long history of support to the EM community, there isn't a clear description of what is new or changing.

Response: Text has been added to the revised SDD to identify new factors that NWS is dealing with in providing support for EM community, which include:

- Expanding demands of the EM community and government core partners in dealing with increasing numbers and kinds of threats;
- A revised National Response Framework which requires NOAA support of DHS-defined emergency support functions;
- Incorporation of new support concepts identified in the NWS Strategic Plan and Weather-Ready Nation Roadmap, such as NWS Emergency Response Specialists and use of an impacts catalog to identify EM and government core partner contacts and impact thresholds for support; and
- the growing capacity of AWCI to provide support for the EM community and government core partners, driving the need to describe the respective roles for the greater good of the Weather and Climate Enterprise.

What has changed with the new NWS Strategic Plan is the recognition of IDSS as a primary role of NWS, with a greater attention to the skills, training, and operational procedures needed to fully and more effectively provide this type of service.

6. Need for examples – Comments indicated that the SDD leaves substantial room for interpretation, and thus leaves the reader without a clear picture of exactly what NWS is attempting to accomplish. A suggestion was made to clarify some of the statements by providing example cases.

Response: The revised SDD includes several descriptive scenarios which illustrate various aspects of our support.

7. Technical approaches - Many comments were provided on recommendations on the technical approach for providing support to the EM community, including use of GIS, web mapping services, state of the art incident management systems, and coordination tools.

Response: The SDD is not intended to cover the technical details of implementing our services. NWS continues to explore the benefits of available technologies to support our operations.

8. Internal Comments – In addition to the comments received from our external review period (summarized above), NWS also was required to address internal NWS comments in developing a revised SDD. The changes to the revised document due to internal comments are summarized below:
 - a. The audience for support addressed by this SDD has been expanded to include government core partners. Often NWS support for a given event/incident expands beyond the EM-managed coordination structures set up for a response effort, but also to existing government constituencies (e.g., FAA) that are also impacted by the incident/event.
 - b. Changed designation of the kinds of NWS IDSS service NWS provides from "Types" to "Tiers" to avoid confusion with NIMS incident Types.
 - c. Wording changes were made (after consultation with subject matter experts at FEMA) to include terminology consistent with National Response Framework and other related FEMA documents.

Conclusion

Comments provided on the Service Description Document covered a broad range of issues of importance to our partners in America's Weather and Climate Industry. Discussions were held with our partners both via teleconference and during an NWS Partners Meeting held in conjunction with the American Meteorological Society's Annual Meeting in February 2014. Based on these discussions and the content of the comments, received, the Service Description Document has been revised and will be submitted for another period of public comment/review.

Appendix

External Comments on Service Description Document Titled “*Proposed Enhanced Impact-Based Decision Support Services for the Emergency Management Community Supporting Events/Incidents Impacting Safety of Life and Property*”

(Collected May - September 2013)

Note: Comments that contained proprietary information and/or those we did not have permission to make public are not included below

Comments may be accessed at the following link: [http://weather.gov/sp/IDSS SDD Comments on version 1.pdf](http://weather.gov/sp/IDSS_SDD_Comments_on_version_1.pdf)