COLLIER COUNTY, FLORIDA

Comprehensive Emergency Management Plan

WILDFIRE OPERATIONS RESPONSE ANNEX C

March 16, 2021

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ANNEX C

EMERGENCY RESPONSE TEAM GUIDELINES FOR WILDFIRE OPERATIONS

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Executive Summary

The Collier County Response Team Guidelines for Wildfire Operations, Annex C to the Collier County Comprehensive Emergency Management Plan identifies the actions that may be taken by the Florida Forest Service and those State and local agencies in support of the Florida Forest Service in preparing for, responding to and recovering from wildfire event(s). This annex addresses the role of State and local government in providing the necessary support to the Florida Forest Service in its statutory responsibilities in responding to, controlling and suppressing wildfires.

The Collier County Emergency Management Office collaborates with the incident's Logistics Chief for coordination of the logistical support. The Collier County Fire/EMS Chief's Association, in cooperation with the Florida Forest Service, will update and coordinate the plans with other response and support agencies.

The Annex is a living document; being reviewed and updated at the conclusion of a major wild land fire event or annually. It is presently divided into four (4) Chapters as follows:

Chapter 1 – Introduction: Provides a discussion of the purpose, scope and planning assumptions used to prepare the annex.

Chapter 2 - The Response Organization: Identifies the various levels of support that may be provided through a Unified Command structure. It describes the circumstances under which the various agencies will unify under a single command structure in responding to, controlling and suppressing wildfires and the responsibilities of the Unified Command components (agencies). This Chapter also addresses the delegation of authority during a wildfire event.

Chapter 3 - The Concept of Operation: Presents the key guidelines that will be used to make key decisions during the course of the event. Based on joint considerations discussed and determined by the county's liaison agencies of the Unified Command (Florida Forest Service, the Collier Fire and EMS Chief's Association and the Emergency Management Division), several guidelines for the three levels of activation (Monitoring, Partial and Full) for the Collier County Emergency Operations Center during a wildfire event have been developed. This Chapter also addresses medical unit activation, air operations, logistical support, and resources.

Chapter 4 - Public Information and Information Flow: Discusses the notification process for active wildfires to the State Watch Office (SWO), the coordination of situation reports and incident action plans.

Attachment 1 - Requesting Fire Suppression Assistance: Provides the framework under which fire suppression assistance will be obtained when State resources have been over extended. Information will be disseminated to the public within the Unified Command. The Chapter also describes the information needed and the steps necessary for satisfying the requirements to request fire suppression assistance from the Federal Emergency Management Agency (FEMA) based on the wildfire or complex of wildfires.

References and Authorities

The authority for the development, implementation and maintenance of this Annex and all compatible county/municipal plans in support of the Florida Forest Service and Division of Emergency Management in its statutory responsibilities in responding to, controlling and suppressing wildfires is derived from Chapter 252.38(1)(a) of the Florida Statutes.

This Annex further serves as the fundamental governing policy as prescribed for the Florida Forest Service under **Chapter 590 of the Florida Statutes.**

The Federal Emergency Management Agency policy on requesting Fire Management Assistance Grant Program is contained within **44 CFR Part 204.**

The Federal Emergency Management Agency's Fire Management Assistance Grant Program and Policy Guide

Operations Plan between Florida Forest Service & Collier County Fire Departments details mutual aid requests and procedures, communications and facilities available as well as broad operational response requirements between fire agencies.

Caloosahatchee All Hazards – Incident Management Team Standard Operating Guidelines establishes TYPE III incident management team operational procedures, organization and deployment strategy.

Fire Management Assistance Grant Program Guidance / Publications (<u>https://www.fema.gov/assistance/public/fire-management-assistance</u>) This site contains all the forms and information relating to the FMAG.

CHAPTER I – INTRODUCTION

I. General

Annex C (The Collier County Emergency Response Team Guidelines for Wildfire Operations) identifies the actions that may be taken by the Florida Forest Service and those State and local agencies in support of the Florida Forest Service in preparing for, responding to and recovering from wildfire event(s). This Annex addresses the role of State and local government in providing the necessary support to the Florida Forest Service in its statutory responsibilities in responding to, controlling and suppressing wildfires.

II. Purpose

The Collier County Emergency Management Division collaborates with the incident's Logistics Chief for coordination of the logistical support.

The Emergency Management Division, in cooperation with the Collier County Fire and EMS Chiefs' Association, will update and coordinate the plans with other response and support agencies.

III. Scope

This Annex covers all wildfires that occur in Collier County that the Florida Forest Service and local governments respond. The purpose of the response is to contain, control and extinguish the wildfire.

IV. Assumptions

- A. The Florida Forest Service is statutorily responsible for wildfire prevention, detection, and suppression on 26,000,000 acres in Florida.
- B. The Florida Forest Service's Caloosahatchee Forestry Center works with the local fire departments and districts to inform the public on the Firewise Communities program. This program educates homeowners and community professionals about creating defensible space around homes and other buildings to help protect from the dangers of wildfire.
- C. The United States Forest Service and the Department of Interior are responsible for wildfire suppression on their respective federal lands throughout the State.
- D. Each year, lightning fires that are associated with Florida's thunderstorm season (April through September) can create tremendous wildfire activity when associated with the State's dry spring conditions.
- E. From 2005 through 2019, an average of 3,162.64 wildfires occurred per year, burning an average of 127,827.07 acres. In 2017, the wildfire season saw 2,930 wildfires consume more than 201,293.5 acres statewide.

- F. Due to changing weather conditions and fire trends, the state's recent peak annual wildfires occurred during 2007, with 4,241 wildfires, with a record low in 2014 of 1,981 wildfires (with 88,647.50 acres burned).
- G. In 1989, a record 645,331 acres burned statewide. However, the most intense fire season on record occurred in 1998 due to increasing wildland/urban interface in the State and historic dry conditions.
- H. The President is authorized to aid, including grants, equipment, supplies and personnel to any State for the suppression of any fire on publicly or privately owned forest or grassland, which threatens such destruction as would constitute a major disaster.
- I. Lightning, unknown and incendiary activities are the dominant causes of wildfires. Lightning remains the leading non-human cause of wildfires accounting for 31.9% during a ten-year period from 2008 to 2017. Unknown causes accounted for 18.9% and incendiary were 13.2% during the ten-year period.

CHAPTER 2 – THE RESPONSE ORGANIZATION

I. General

This Chapter of the Annex describes the organization to be used to coordinate Collier County's agencies support of the Florida Forest Service's response during wildfire events. It describes the Unified Command structure the various agencies will work under to control and suppress wildfires. Also, it addresses the circumstances under which the unified structure will support Forest in its response to wildfires. Following the catastrophic fires in Florida during the summer of 1998, State and Federal agencies developed new and updated strategies to deal with serious statewide wildfires. A major change since 1998 was in the organization of statewide oversight. In 1999, a Unified State Command comprised of in-state personnel was used. The Unified State Command structure will be the process used to manage serious wildfire events.

II. Response Organization

A. Local

The Incident Management Team (IMT) comprised of locally trained State and local firefighters will be used to manage fire-fighting operation when two mutual aid departments and Florida Forest Service assets are engaged in a wildland firefighting operation. The Incident Management Team will request activation of the County Emergency Operations Center and/or State's response system when the wildland fire is expected to exceed local fire-fighting capabilities.

B. State

The Unified State Command is established as conditions warrant based on a joint decision by the State Forester and the Forest Supervisor of the National Forest in Florida and/or a representative of the Department of the Interior. Unified State Command is organized like a State Multi-Agency Coordination (MAC) group, but with the important difference being that the Unified State Command also retains operational command of resources as well as provides logistical coordination. The Unified State Command is set up so that an Incident Commander is provided from the primary jurisdictional agencies on which the wildfires are occurring. Unified State Commanders will include the Florida Forest Service and either the USDA Forest Service, National Park Service, the United States Fish and Wildlife Service or the Bureau of Indian Affairs.

In addition to the Incident Commanders and jurisdictional agency liaisons, the Command Staff will also include liaisons from several key support agencies. These support agencies include the Division of Emergency Management, Division of State Fire Marshal, Florida Fire Chief's Association; Florida National Guard and if involved the Federal Emergency Management Agency.

III. Responsibilities

A. Collier County Emergency Management Division

- Support wildland fire-fighting operations with logistical support.
- Enter "WebEOC" requests to the State Emergency Operations Center.
- Monitor the operation so as to request the Board of County Commissioners issue a Local Declaration of Emergency and issue warnings to the affected communities as the situation warrants.
- Activate the Emergency Alerting System to facilitate area evacuation(s).
- Activate sheltering/cooling operations for those evacuated.

B. Collier County Fire/EMS Chiefs' Association (CCFEMSCA)

The CCFEMSCA will organize and maintain the County's Incident Management Team to support wildland fire-fighting operations. This Incident Management Team can be deployed to support other wildland fire-fighting operations in the region.

C. Florida Forest Service, Caloosahatchee Forestry Center (D-17)

The FFS Caloosahatchee Forestry Center manager, or designated representative, will activate the Incident Management Team when the situation warrants. The Center will also ensure that an annual wildfire operations plan is reviewed and signed off by all cooperators.

D. Dept. of Agriculture and Consumer Service, Florida Forest Service

The Department of Agriculture and Consumer Services, Florida Forest Service has statutory responsibility for the suppression of wildland fires in the State of Florida. The Florida Forest Service has the Lead Role in determining when a State Unified Command will be established. In consultation with other State and Federal partners, the Florida Forest Service will appoint one member of their organization and at least one alternate to serve as State Incident Commander. The Incident Commander will determine the scope and structure of the Unified Command for the wildland(s) burning in the State.

E. Florida Division of Emergency Management

The Florida Division of Emergency Management has statutory responsibility for coordinating State and local support to the Florida Forest Service in the response and recovery from wildland fires. A liaison will be appointed to coordinate the Division's support role. Various support elements will be initiated as requested by the Incident Commander.

F. Florida Fire Chiefs' Association

The Florida Fire Chief's Association provides the Florida Forest Service logistical support through the services of fire departments throughout the State. This support effort will be initiated according to the Florida Fire Chiefs'

Association State Emergency Response Plan (SERP) that is activated by request for Emergency Support Function 4, Firefighting.

G. Division of State Fire Marshal

The State Fire Marshal appoints an Emergency Coordination Officer for Emergency Support Function (ESF) -4, Firefighting. ESF-4 is responsible for logistical request from State and local governments for firefighting and EMS resources. These resources are then dispatched according to the requirements of the Florida Fire Chiefs' Association Disaster Response Plan.

IV. Delegation of Authority

Incident Management Team(s) for the incidents will be organized in Unified Command with liaisons from the Division of Emergency Management and the Division of State Fire Marshal or the Florida Fire Chief's Association.

CHAPTER 3 – THE CONCEPT OF OPERATION

I. General

This section of the Annex presents key guidelines that can be used to make key decisions during the event. These decisions will be based on experience, the best evaluation of the current situation, and the forecast for the near future. All wildfire responses will use the National Incident Management System (NIMS) as the emergency response organizational management structure.

Based on joint considerations discussed and determined by the County's liaison agencies of the Unified Command (Florida Forest Service, the Collier Fire/EMS Chiefs' Association, and the Fire Chief(s) of the affected area(s)), several guidelines for the three levels of activation (Monitoring, Partial and Full) for the Collier County Emergency Operations Center during a wildfire event have been developed. When the EOC is activated in support of the Wildfire Response it will act as a Multi-Agency Coordination Center in support of the Unified Command.

II. Level Three, Monitoring Phase:

When two mutual-aid Departments and Florida Forest Service or one Strike Team is called out, the Emergency Management Division will deploy a liaison to the scene, unless the mutual-aid deployment was only due to the normal lack of organic resources within the agency and not generated by the incident commander "size-up" of the fire situation. Additionally, the Emergency Management Division may deploy a liaison to the scene upon request of the incident commander. The Emergency Management Division will maintain a liaison with the Incident Management Team at the point when the Multi-Agency Coordination/Communication Vehicle is deployed. When wildland fire-fighting activities increase whereby greater logistical support is anticipated and the State's Incident Management Team is not in place, the Collier County Emergency Management liaison will remain in contact with the Florida Forest Service and the Emergency Management liaison will remain in contact with the Florida Forest Service and the Emergency Management liaison is deployed to the EOC.

III. Level Two, Partial Activation

The Collier County Emergency Operations Center may be activated to a Level Two and an Area Command (see Annex F) may be established based on a variety of considerations.

A. The Request for Issuing a Local Declaration of Emergency

When appropriate, the Emergency Management Division will request a Local Declaration of Emergency from the Board of County Commissioners based on the following factors:

- 1. When the wildland fire is out of control and threatening a community.
- 2. When the Emergency Management Division or the IMT requests additional powers to speed the logistical support effort.

3. When community evacuations may be required.

B. The Collier County Fire/EMS Chiefs' Association (CCFEMSCA) Liaison to the County Emergency Operations Center

Once the Collier County Emergency Operations Center has gone to Level Two, the CCFEMSCA will provide a liaison to the County Emergency Operations Center and provide information coordination for the County Emergency Support Functions (ESF-4) or send an IMT to the EOC to establish an Area Command.

IV. Level One, Full Activation

A. The Emergency Management Division Guidelines to Fully Activate the County Emergency Operations Center

The Emergency Management Director, in consultation with the CCFEMSCA Liaison and County Manager, will make the decision when to activate the County Emergency Operations Center to a Level One. The following factors may be used in the decision-making process:

- 1. When a response to a wildfire event requires the resource and/or logistical support from a majority of the County's Emergency Support Functions.
- 2. When a wildfire event necessitates evacuations that require resource support from neighboring counties.

B. The CCFEMSCA Coordination with the Emergency Management Division

The CCFCA and the Emergency Management Division will coordinate several critical functions as follows:

- 1. Emergency Support Function 4 (ESF-4) will provide logistical liaisons to the Florida Forest Service/US Forest Service offices or at the Unified Expanded Dispatch.
- 2. A Joint Information Center (JIC) will be established at the scene. The Florida Forest Service will provide briefing points on the wildfire situation through Emergency Support Function 14. Emergency Support Function 14 will then coordinate this consistent information message with other Public Information Officers throughout the county.
- 3. An Emergency Management Division liaison will be included in the planning process with the IMT personnel in the formation of the Incident Action Plan (IAP) for the wildfire event when the Emergency Operations Center is activated to a Level Two or One.
- 4. The CCFEMSCA will provide liaisons to the County's ESF-5, Planning, to consolidate the planning process and provide input into the situation reports issued to the State Emergency Operations Center.

C. The CCFEMSCA's Co-Location to The County Emergency Operations Center

The Unified Command will jointly determine when and what portions of the IMT structure should co-locate to the County Emergency Operations Center. The Emergency Management Division will provide all support resources for such co-location.

The joint decision to co-locate will be based on guidelines including:

- 1. The number of wildfire incidents requires continual coordination and logistical support from various County Emergency Support Functions. The liaison initially provided by the Emergency Management Division during Level Three Activation is overwhelmed with the amount of coordination required.
- 2. The number of wildfire incidents requires the formation and possible forward insertion of an Area Command or multiple Area Commands.

V. Medical Unit Activation

A medical unit may be activated when an Incident Management Team is put in place to coordinate large numbers of firefighters or emergency personnel. If the Incident Management Team requests a Medical Unit, the request will go through the County Emergency Operations Center.

VI. Air Operations

When the Florida Forest Service and the United States Department of Agriculture, Forest Service, under increased wildfire activity, establish Unified Air Operations for statewide wildfire aviation coordination, the Unified Air Operations will establish an Air Operations Plan that will coordinate all aircraft associated with fire operations or flying within wildland fire aviation air space. Within Collier County the Caloosahatchee Forestry Center Forest manager, or designated representative, oversees the local air space around the wildland fire. This includes:

- Forestry Aircraft
- Fire agency aircraft
- Law Enforcement aircraft
- Military aircraft
- Contractor aircraft
- Media aircraft

VII. Resources

The Florida Forest Service and the affected fire district will be responsible for command and control of all operational elements of the wildfire response to include resource ordering for wildfire incidents. The Emergency Management Division will support the wildland fire-fighting operations by managing and coordinating any non-wildfire resource ordering through the Emergency Support Functions and the State Emergency Operations Center. The Incident Commander will order fire-fighting resources through local dispatch.

The fire-fighting resource-typed units are detailed in the current year's Caloosahatchee All Hazards – Incident Management Team Standard Operating Guidelines.

VIII. Logistical Support

This Section identifies the roles of the agencies involved in the logistical support of the IMT during wildfire events. Separate processes exist for the ordering of resources and other logistical support for the wildfire events and the Incident Management Teams commanding the suppression of wildfires. In addition, the linkage needed between these resources and logistical ordering processes to provide the correct resource, to ensure that it is provided in a timely manner, and that they are provided cost-effectively is identified.

The primary method in which resources and logistical support is ordered for wildfire events include:

- A. The Florida Fire Chiefs' Association State Emergency Response Plan (SERP) in support of the Division of State Fire Marshal as the Lead Agency for ESFs-4 (Firefighting), -8 (Health & Medical), -9 (Search & Rescue) and -10 (Hazardous Materials).
- B. The Logistics Section of the County Emergency Operations Center.
- C. Florida Forest Service.

CHAPTER 4 – PUBLIC INFORMATION and INFORMATION FLOW

I. General

This Chapter provides how information will be shared during a wildfire event. During a wildfire event a Joint Information Center (JIC) will be established at the scene comprised of representatives of the affected fire district, Florida Forest Service and the EOC. During the activation of the County Emergency Operations Center, the EOC representative to the JIC will establish a mechanism that efficiently provides and disseminates information to the public. The EOCs lead Public Information Officer will facilitate the logistical support and orientation for all Public Information Officers working in the County Emergency Operations Center.

II. Unified Public Information

When the County Emergency Operations Center is activated (Level 2 or 1), State & local Fire Agencies and County agencies will provide experienced Public Information Officers to ESF-14 or provide access to Public Information Officers to respond to information requests of that agency. In the initial stages of an Incident Management Team Information Flow, a plan will be developed. During Level 2 Activation, the additional Public Information Officers represented in ESF-14 may include:

- The Emergency Management Division,
- The Florida Department of Agriculture, Florida Forest Service, and,
- The Collier County Fire Chiefs' Association.

During Level 1 Activation, staffing may increase based on the needs of the response and may include the Federal Emergency Management Agency, the Florida National Guard, and others as warranted. Each agency will become part of the Unified Public Information.

III. Information Flow

A. Fire Activity

- 1. The Florida Forest Service, Caloosahatchee Forestry Center will notify the State Watch Office of any significant fires that develop.
- 2. The CCFEMSCA representative in the IMT will notify the County Emergency Management liaison or Emergency Operations Center of any significant fires that develop.
- 3. The criteria for significant fires include:
 - a. Wildfires that threaten structures, or where structures are lost.
 - b. That forces or has the potential to force evacuations of citizens.
 - c. Wildfires that cause the injury or death.

- d. Wildfires that create significant smoke problems that may cause road closures to major thoroughfares.
- e. Large significant wildfires that require movement of out of district forestry resources.

B. Situation Report Information

- The Florida Forest Service will continue to produce a daily wildfire summary, which is available at their website <https://www.fdacs.gov/Divisions-Offices/Florida-Forest-Service >. The Forest Protection Bureau can be contacted for any clarifications that may be required from the raw data on the summary.
- 2. The Emergency Management Division will extract pertinent information from that scene and liaison officers for its situation reports, which will be completed and transmitted to the State Emergency Operations Center.
- 3. The CCFEMSCA shall distribute a daily situational report (SITREP) which will report apparatus issues, anticipated weather, and any significant item of concern for the various CCFEMSCA agencies, Collier County and regional representatives.

Attachment 1 - REQUESTING FIRE MANAGEMENT ASSISTANCE GRANT

I. General

The President of the United States is authorized to provide Federal assistance to any state for the suppression of any fire on publicly or privately owned forest or grassland that would constitute a major disaster. Such assistance may be in the form of grants, equipment, supplies and personnel in accordance with the Federal Emergency Management Agency's policy on requesting Fire Management Assistance Grant as contained in 44 CFR Part 204, Fire Management Assistance Grant.

II. Purpose of Fire Management Assistance Grant Program

Through the Fire Management Assistance Grant Program, the Federal Emergency Management Agency's role in combating grassland, wildland, or wildland/urban interface fires is to provide financial assistance to states for fire suppression. The program is unique in that the Federal Emergency Management Agency actively helps suppress fires that threaten such destruction as would constitute a major disaster. When it has been determined that a wildland fire or fires on publicly or privately owned forest or grassland threaten such destruction as would constitute a major disaster, supplemental assistance may be provided in the form of a single grant, to reimburse eligible fire suppression costs.

III. Scope of Fire Management Assistance

A fire management declaration is the authorization of Federal assistance that is made to the Federal Emergency Management Agency when a fire or fires constitute the threat of a major disaster.

A. Criteria for Fire Management Assistance Grant Declaration

The Federal Emergency Management Agency will authorize a Fire Management Assistance Grant (FMAG) Declaration if the eligible damage and potential impact of the fire is of a magnitude that it could result into a major Disaster Declaration for Public Assistance and/or Individual Assistance.

B. Key Factors for Fire Management Assistance Grant Declaration

- 1. The Florida Forest Service, the State Coordinating Officer, the Principal Advisor, and the Federal Emergency Management Agency will consider the following key factors when evaluating and analyzing the need for fire suppression assistance:
 - a. Threat to lives and improved property
 - b. Threat to critical facilities.
 - c. Committed or unavailable State and local resources including resources through: State agencies; local fire departments; Cooperative Agreements; and

- d. Interstate/Regional Compacts; the Emergency Management Assistance Compact.
- 2. High danger fire conditions, as indicated by:
 - a. Keetch-Byram Drought Index (KBDI) or similar nationally accepted index.
 - b. Energy release component.
 - c. Current weather conditions.
 - d. Rate of spread based on a nationally accepted behavior model.
 - e. Spread component.
 - f. Ignition component.
 - g. Burning index.
 - h. Relevant State restrictions in place and implemented.
 - i. Topography of the land.
- 3. Threatened watershed areas.
- 4. Potential impact on the environmental and historic/cultural resources.
- 5. Potential major economic impact.
- 6. Existence of multiple wildfires/potential convergence of fires.

IV. Gathering Information for Fire Management Assistance Request

Staff for the Florida Forest Service will be made aware of the potential need to document and gather information required to request Federal Fire Management Assistance.

A. Critical Information for Requesting Fire Management Assistance

When making a request for Federal Fire Management Assistance Grant, the following critical information is required and must be gathered:

- 1. If the State is unable to control or suppress wildfires or a complex of wildfires without out-of-state assistance.
- 2. If homes and/or structures are threatened and or evacuated due to the threat of the wildfire and the number of such homes, structures, or commercial businesses that are threatened.
- 3. If there is key infrastructure being threatened such as power plants, utility lines, water and/or sewage plants.

- 4. If the wildfire is not controlled or contained at the time of the request.
- 5. The number of resources that is being utilized, including local fire/rescue resources, are documented and reported.
- 6. Current weather conditions are being reported and documented as extreme.

B. Closing Fire Management Assistance Grant

To close out a Federal Fire Management Assistance Grant in the State of Florida, the Unified Command/Florida Forest Service representative will notify the State Coordinating Officer of any Complexes in which all fires are controlled thus signaling the end to the grant period. It will then be the Florida Forest Service's responsibility to issue the notification to the principal advisor. All such notifications must be in writing.

V. Roles and Responsibilities for Fire Management Assistance Grant Program

A. The Florida Forest Service Incident Commander

The Incident Commander will notify the Florida Forest Service's State Officer in Charge of the wildfire, as soon as possible and report the information that is available. The Incident Commander will coordinate this information with the County Emergency Management representative.

B. The Director of the Florida Forest Service

The Director or designee will coordinate with the Division of Emergency Management liaison or Duty Officer to notify the State Coordinating Officer, if identified, when a fire meets the criteria for a Fire Management Assistance Grant. Contacting the State Watch Office can do this notification.

C. The State Coordinating Officer

- 1. Will by telephone, fax, or through other rapid communications, contact the Regional Federal Emergency Management Agency Coordinator and make them aware of the situation and of the request.
- 2. Will follow-up in writing to the Region IV office of Federal Emergency Management Agency outlining some of the principal items in the request.
- 3. Will apply for assistance for wildfire complexes utilizing established Forestry Districts or Centers encompassing varying numbers of counties and will continue to utilize these Districts/Centers when applying for additional assistance.

D. The Florida Forest Service Representative

- 1. A representative from the Florida Forest Service will fill out the Federal Emergency Management Agency request form **FEMA Form 078-0-1**, Request for Fire Management Assistance Declaration. The form is then signed by the State Coordinating Officer and submitted to the Federal Emergency Management Agency's Regional Office.
- 2. Will contact the Federal Emergency Management Agency's Principal Advisor to make any request a recommendation be made on the grant request.

E. The Principal Advisor

The Principal advisor will complete their recommendation and submit it to Federal Emergency Management Agency on **FEMA Form 078-0-2**, Principal Advisor's Report.