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Description of document: Federal Emergency Management Agency (FEMA) After Action Report on Gotham Shield Exercise 2017

Requested date: 26-October-2020

Release date: 09-November-2020

Posted date: 26-July-2021

Source of document: FOIA Officer  
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**FEMA**

November 9, 2020

**SENT VIA E-MAIL**

**Re: FEMA FOIA Case Number 2021-FEFO-00074**

This is the final response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), dated October 26, 2020 and received in this office on October 30, 2020. You are seeking a copy of the "After-Action Report or other Final Assessment of the Gotham Shield Exercise (2017)."

A search was conducted of FEMA's Response Office for documents responsive to your request. The search produced a total of seven (7) pages, which are enclosed in full. The responsive pages consist of a report entitled, "FEMA Exercise Branch, Gotham Shield 2017 Quick Look Report."

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If you need any further assistance or would like to discuss any aspect of your request, please contact the assigned FOIA Specialist at [alexander.yacoubian@associates.fema.dhs.gov](mailto:alexander.yacoubian@associates.fema.dhs.gov) and refer to FOIA case number 2021-FEFO-00074. You may also contact someone at [fema-foia@fema.dhs.gov](mailto:fema-foia@fema.dhs.gov), or (202) 646-3323, and you may contact our FOIA Public Liaison in the same manner. For a faster response please email the assigned FOIA specialist directly.

Sincerely,

BROOKE E NICHOLAS

Digitally signed by BROOKE E  
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Date: 2020.11.09 16:04:21 -05'00'

Brooke Nicholas  
Lead Government Information Specialist  
Disclosure Branch  
Information Management Division  
Office of the Chief Administrative Officer  
Federal Emergency Management Agency  
U.S. Department of Homeland Security

Enclosure: Responsive Record (7 pages)

## Gotham Shield 2017 Quick Look Report

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### Purpose

This is a Quick Look Report that provides a summary of overarching observations and recommendations for FEMA play, during the Prevention and Response phases of conduct during the Gotham Shield 2017 (GS 17) Exercise. The scenario was an Improvised Nuclear Device (IND) 10kt explosion. GS17 took place across multiple venues in FEMA Region II, consisting of the States of New Jersey and New York, the City of New York and the National Response Coordination Center (NRCC) in Washington, DC, on April 24 – 28, 2017.

These findings constitute a preliminary summary of evaluators' initial impressions, in conjunction with findings by both Senior Leaders and staff-level players provided during the Hotwash and on Participant Feedback Forms.

### Exercise Overview

GS 17 exercised the whole community effort to prevent, protect from, respond to, and plan initial recovery operations after an IND incident. The exercise allowed an opportunity to assess National and Regional Incident Management and Incident Support capabilities, through an opportunity to evaluate the draft FEMA Region II IND Plan and the Federal Interagency Operational Plans (FIOP), and the FIOP Nuclear Radiological Incident Annex. Exercise play extended to include recovery, pre and post detonation of a nuclear device, by linking multiple Whole Community exercise events: Ardent Sentry, Vital Archer, Vibrant Response, Prominent Hunt, and Staunch Maple.

### Overarching Observations

- 1) The exercise demonstrated the importance of the Federal response and recovery enterprise fully dedicating resources from across Federal departments and agencies in an expedient and phased manner based on incident strategic priorities, order of employment, and feasibility for movement.
- 2) The exercise demonstrated the need to adjust the employment and staging of survivor-support resources to account for large crowd dynamics and self-initiated decision making regarding sheltering, evacuation, and medical attention.
- 3) The exercise demonstrated the continued importance of the Response and Recovery mission's for understanding how to transfer national and regional operational plans into action through training, socialization, and application of crisis action planning protocols.

### Executive-Level Lessons

The following are key executive and policy lessons observed during the exercise.

#### Private Sector Assistance

The exercise demonstrated needed clarity on the application, scope, and authorization of federal assistance for private organizations where that assistance is necessary for the preservation of life



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and property required to save and sustain life. Consistent themes of needed assistance included lodging, security, feeding, hydration, transportation, communications, fuel for vehicles and generators, personal protective equipment and dosimeters for critical infrastructure restoration and continued services.

In extremely rare circumstances, a private for-profit entity may be the beneficiary of federal assistance when it is determined such assistance is necessary to enable private organizations to continue and provide a critical service to the community at large. The service must involve an activity to save lives; protect property or public health and safety beyond the capability of the local, state, tribal, territorial or insular area of government. If authorized, this assistance would be for an exceptionally limited period of time and only for so long as to allow the private sector entity an opportunity to take the necessary steps to meet its own unmet needs. The Stafford Act does not authorize assistance to the private sector for economic recovery. However, they may be eligible for the Small Business Administration's Economic Injury Disaster Loans.

### Application and Validation of Unique Emergency Authorities

The Exercise demonstrated interagency knowledge and application of certain emergency authorities such as the Defense Production Act (DPA) to access critical unique capabilities under exigent circumstances. The exercise design did not allow participants the ability to demonstrate the full execution and application of such authorities.

The requirements for limited supplies of critical capabilities included personnel protective equipment, dosimeters, medical countermeasures, and other resources arose for federal, state, local, and non-governmental operations. During the exercise, there was the potential for unique authorities and priority status for resources to be triggered by multiple departments and agencies through the National Response Framework (NRF) construct to conduct the coordination at the NRCC.

Consideration is warranted on how requirements for DPA and other authorities are identified and applied to contracts. A review of agency processes are also warranted on the allocation and prioritization of how DPA and other unique authorities are applied through the NRF and at the National Response Coordination Staff.

### Development and Promulgation of Protective Action Guideline Messaging

The exercise provided an opportunity to explore and validate existing policies specific to a Nuclear Detonation to include an Improvised Nuclear Device Response and Recovery: Communicating in the Immediate Aftermath and Health and Safety Planning Guide: For Planners, Safety Officers, and Supervisors for Protecting Responders following a Nuclear Detonation. Participants leveraged these policies in an adaptive planning context enabling the rapid provision of protective action guidance for both those immediately impacted as well as to ensure adequate protections for those responding to the incident.

The exercise demonstrated proper utilization of subject matter experts from across the Federal government, deliberate planning materials, and Emergency Support Function (ESF) 15 processes to inform, develop and disseminate guidance on citizen protective actions. Furthermore, there was a consensus from the States and Federal entities on the application of guidance on shelter-in-place, decontamination, personal protection equipment, and other protective measures unique to



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radiological threats. These activities were successfully supported by the Nuclear/Radiological Incident Task Force (NRITF) Subject Matter Experts.

The action to assess and develop protective action guidance is well established as a key decision in the deliberate plans. This process may be expedited through the inclusion of such guidance established during Gotham Shield 2017 consistently within those plans and the ESF 15 standard operating procedure. Messaging should include opportunities for individuals to take on their own initiative to protect themselves quickly with fewer dependencies on the limited federal and state/local capabilities early in the response phase.

### **Plan Development and Execution (NR1A, Region II IND, Mass Evac)**

The exercise demonstrated full use of deliberate operational plans at the national and regional level to inform operational decision-making. Plan checklists, including the inclusion of new resource phasing plans, served to expedite the identification of priority deployments based on optimal employment and transportation feasibility.

The Exercise highlighted improvements needed to acknowledge how the federal support architecture shall adjust the employment and staging of survivor-support resources to account for crowd dynamics and self-initiated decision making regarding sheltering, evacuation, and medical attention. A key area of focus should be the application and coordination of federal support to state and local evacuation operations, including the local government's establishment of community reception centers and points of debarkations for evacuation as well as medical evacuation capabilities.

Future planning initiatives will include Region II continued planning with the State and City on Community Reception Centers to refine the Region II IND Response Plan and the development of a Federal Evacuation Support Annex inclusive of a medical evacuation appendix. The Domestic Resilience Group support is also sought to reinforce the operationalization of deliberate plans through socialization, support for training, and ensuring a strong link between future exercises to validate completed plans.

## **FEMA Objectives and Associated Core Capabilities**

Please see attachment for the GS 17 Objectives and associated Core Capabilities

## **Preliminary Findings**

The following preliminary takeaways offer a quick look summary of key issues emergent from the exercise.



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### Evacuation Support and People Movement

- The characteristics of the scenario including a catastrophic detonation in a heavily populated metropolitan area, created a major movement of people from the impacted area. Evacuation is the responsibility of the states and the federal government supports the effort as requested by states. Participants recognized there would be a significant movement of population which was not ordered to evacuate but were self-evacuating to a variety of reasons (i.e., stay with family/friends in other locations). The exercise revealed to FEMA will need to collaborate with the states in handling the full scope of movement and guidance, which will need to be developed and integrated into a message that communicates acceptable sheltering options and locations. FEMA plans should include:
  - How the federal support architecture shall adjust the employment and staging of survivor-support resources to account for crowd dynamics and self-initiated decision making regarding sheltering, evacuation, and medical attention.
  - Application and coordination of federal support to state and local evacuation operations, including the local government's establishment of community reception centers and points of debarkations for evacuation; as well as medical evacuation capabilities.
- States will require support for decontamination of individuals as they move outside of the contaminated areas.
  - For example, (i.e.) two million people decide to move in or out of the city, and there is a significant possibility that a high number of these people are contaminated; how does the state with federal support facilitate that level of decontamination? Radiological contamination in this scenario is a particulate matter; will it be a matter of removing particles and debris?
  - Plans should be adaptable with messaging on decontamination.
- The Office of External Affairs followed the state message of shelter in place, but realized contaminated people were self-evacuating. This created challenges for messaging, causing an entirely different messaging component when two actions different actions are occurring simultaneously.
  - Plans and messaging should be prepared regarding basic self-decontamination procedures for self-evacuating and shelter-in-place personnel.



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- The exercise demonstrated needed clarity on the application, scope, and authorization of federal assistance for private organizations where assistance is necessary for the preservation of life and property required to save and sustain life. Consistent themes of needed assistance included lodging, security, feeding, hydration, transportation, communications, fuel for vehicles and generators, personal protective equipment and dosimeters for critical infrastructure restoration and continued services.
  - The National Business Emergency Operations Center facilitated the private sector calls, which were productive with strong participation.
  - The greatest concern voiced by the private sector was that they did not have good information on ingress and egress routes, and they were unsure of the contamination status in the impacted.
- Participants acknowledged that millions of people were on Long Island without the ability to get the 72-hour provision cycle in place (e.g., food, fuel). They were not looking to move three million people off the island; instead, they explored options for supplying via maritime capabilities until normal distribution methods were reestablished.

### **Capability, Capacity, and Understanding for Catastrophic Response**

- Participants expressed difficulty understanding the scope and magnitude of impacts. There was a lack of understanding about the challenges created from by two million people in the streets requiring support; most of those people rode the train in and now they only have work supplies and are in an environment with no access to care or shelter.
  - Planning assumptions need to acknowledge that survivors will open their doors and businesses to assist in the initial days.
  - Messaging cannot control these actions, but can encourage the community to support and seek support from each other while the federal support is being coordinated.
  - Messaging must be coordinated and ensure incorrect information is not promulgated which could put people in harm's way.
- FEMA should review and include concepts developed in Civil Defense Plans that still have application in the current environment (e.g., using postal vehicles for fatality management).





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- Participants did not reach an understanding on expectations for levels of care or communication of those expectations. Players discussed patient movement outside the affected area to more outlying locations to make room for other survivors. There are plans for busses, planes, etc. to transport people, but no plan for transporting people to debarkation points. FEMA needs to continue and work with Health and Human Services to refine the process.

### **Priority Management and Operationalization**

- The unique aspects of the scenario forced leadership to think through an unknown situation. This caused participants to have differing priorities or priorities that changed during the operational period. FEMA usually has the same top three priorities, but this forced the NRCS to think abstractly. This event made NRCS work differently because FEMA did not know exactly where the problem was and the magnitude of resources needed. This required the use of models to make decisions early in the response.
- FEMA needs to look at a consolidation of priorities across plans. The complication ensues when associated references have different sets of priorities that are not reconciled. FEMA needs to review priorities and ensure they are not competing against one another. As FEMA rewrites the National Incident Support Manual, we will need to distill the priorities or intent for the different phases. Proliferation of priorities was an issue in the exercise.
- How does FEMA do the operational art of executing a plan and transitioning from current operations into future operations? The plan is the starting point—it may shift from a 12-hour to 24-hour to weekly plan—and we do not want to lose focus on that.
- In an event like this, it is possible the FEMA Administrator would spend portions of the day at the White House, along with other FEMA leadership, who would then be unavailable for guidance.

### **Future Planning Cells**

- FEMA should maintain a standard list of planning cells and task forces with relevant information of location and identification of staff positions to expedite ramp up time.
- FEMA was aware they have a lot of work to do with the planning cells. In reality, this incident would be an all hands on deck activity. However, during the exercise, 90% of people at headquarters were not playing, so we did not think big enough with organizing that piece.

### **Managing a Federal Response**



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- Field Operations staffing would be overextended in response to a scenario of this magnitude. How can FEMA use other non-affected Regions more effectively? Staff proficiency in these matters should be a focus.
- There may have been confusion about the Disaster Recovery Manager (DRM) memorandum. The Regional Administration gave the authority to the Federal Coordinating Officer, but NRCC players did not receive a copy of the memo. It brings out the point that if you have a Region that is incapacitated and an RA that is unreachable, it would be a good idea to have a back-up plan/DRM letter ready to go.

