



## 2006-2007 SANTA CLARA COUNTY CIVIL GRAND JURY REPORT

# SECURITY DEFICIENCIES THREATEN VITAL LINK: COUNTY COMMUNICATIONS CENTER AT RISK

### Summary

During a tour of the Santa Clara County Communications Center (CommCenter), on September 22, 2006, members of the 2006-2007 Santa Clara County Civil Grand Jury (Grand Jury) observed a number of significant deficiencies in the physical security of the CommCenter. These deficiencies make the CommCenter vulnerable to vandalism, natural disaster, and terrorism. On November 7, 2006, the Grand Jury performed a detailed security inspection of the exterior areas of the facility and uncovered thirty-nine deficiencies. Results of this inspection were reported to the Director of the CommCenter. The Grand Jury then sent a copy of the inspection results to the Santa Clara County Office of the Sheriff (Sheriff), along with a request for a full, on-site threat assessment to be conducted by the Sheriff's Special Operations section. A full, on-site threat assessment was performed on January 11, 2007. The results of that assessment were sent to both the Director of the CommCenter and the Grand Jury.

The two inspections confirmed that there are serious weaknesses in the physical security of the CommCenter that need to be addressed immediately. An operational communications hub is vital to coordinating the response to emergencies. The assessment report from the Sheriff's inspection included four recommended enhancements to rectify the most serious of these deficiencies. In a post-inspection discussion by the Grand Jury and the Director of the CommCenter, the Director indicated awareness of many of the deficiencies. A grant has been obtained for the first two recommended enhancements. A funding request for a third recommended enhancement has been submitted to the Santa Clara County Board of Supervisors (BOS) but has not yet been approved. The fourth enhancement has not yet been addressed.

The Grand Jury recommends that, because of the critical nature of this facility, the BOS immediately fund, on an emergency basis, a second access road to the site and those recommended enhancements contained in the Sheriff's report that are not funded by existing grants.

### Background

The Grand Jury tours many facilities in order to evaluate the operations of various governmental agencies and special districts in Santa Clara County (County). In 2006, one of these facilities was the CommCenter. While the primary purpose of these

tours is familiarization rather than inspection, often observations are made that lead to further study. This was the case on September 22, 2006, when the Grand Jury toured the CommCenter. During the tour of the exterior of the facility, one of the Grand Jurors with a background in radio communications noticed problem areas that made the CommCenter vulnerable to terrorism, vandalism, and natural disaster. As a result of these observations, a detailed inspection of the exterior areas was scheduled and conducted.

The CommCenter is the County's communication safety net for public safety, public health, social services, and Valley Medical Center. The CommCenter is the primary support for the Santa Clara County Emergency Operations Center. In addition, it is the radio communications facility for daily 9-1-1 telephone calls, County ambulance services, County Fire, County Parks, and the Sheriff. This location is the dispatch center for these activities. There are also three non-governmental agencies that have communications equipment on this site. All three of these agencies are critical assets in a major emergency. The CommCenter is also the location of communications relay equipment that interconnects certain statewide law enforcement and public safety networks. The site houses both the necessary electronic equipment for these functions and the personnel necessary for the operation and maintenance of the site. Dispatchers operate this facility twenty-four hours a day, 365 days a year.

Unlike the City of San Jose's communications facilities, which are located in many different areas, the County communications facility is located at a single site. Should this facility be damaged, alternatives for dispatching emergency resources are extremely limited.

On November 7, 2006, four members of the Grand Jury conducted an in-depth security assessment inspection of the exterior areas of the CommCenter. The inspection team was given permission to look at all areas of the facility without interference from site personnel. During the inspection, photographs were taken to document the findings of the team. The team found thirty-nine conditions that constituted security vulnerability. The follow-up threat assessment by the Special Operations Section of the Office of the Sheriff, requested by the Grand Jury, not only validated most of the findings of the Grand Jury inspection but also revealed other areas of vulnerability.

The Sheriff's report includes a section on "Recommended Enhancements." The recommended enhancements cover only the four most immediate security weaknesses. The Sheriff's report mentions that, while these enhancements are significant, they constitute a "...band aide [*sic*] approach to improving the overall site security." They do not cover those vulnerabilities that the Grand Jury observed that would require a long-term plan to implement, such as a secondary access road to the site. The cost of the Sheriff's four key recommended enhancements is estimated to be between \$190,000 and \$285,000.

A grant for two of the items recommended by the Sheriff's assessment has been obtained. Orders for the equipment and installation are being prepared. A request for a third recommended item is pending with the County's Fleet and Facilities Department and has yet to be approved by the BOS.

## **Discussion**

The CommCenter has been identified as a *Critical Infrastructure and a Key Asset* in terms of the *President's National Strategy for the Physical Protection of Critical Infrastructures and Key Assets*, of February 2003. Therefore, information about specific vulnerabilities cannot be discussed in a public document. Persons having a "need to know" can obtain the *Santa Clara County Communications Threat Assessment Report*, dated January 11, 2007, and the Grand Jury's *Santa Clara County Communications Center Security Assessment Results* from the Office of the Sheriff. Discussion in this publicly released report is limited to the importance of providing emergency funding for "hardening" the site against the three threats of terrorism, vandalism, and natural disaster.

## **Terrorism**

At the time that this report was written, the Homeland Security Advisory System Threat Level was YELLOW – ELEVATED: "Significant Threat of Terrorist Attacks." According to the Sheriff's Threat Assessment Report, total loss of the CommCenter could lead to loss of life in the county and would have national impact. Total damage to the dispatch center would cause an immediate shutdown of this critical service. Based on the Sheriff's Threat Assessment estimated repairs would take in excess of four months.

There are no redundant County communications facilities in the area. The mobile communications bus has limited capabilities. Loss of the CommCenter would require a complete restructuring of the emergency dispatch system. There are thirteen other municipal dispatch centers in the county. The municipal dispatch centers might be able to accommodate the increased volume should the CommCenter be lost; however, intensive cooperation and restructuring would be required. Currently, the County has a procedure whereby the City of San Jose could act as a 9-1-1 backup, but only for a limited time. There are no procedures for utilizing the other twelve municipal dispatch centers.

In an emergency requiring the activation of the Santa Clara County Office of Emergency Services (OES), the OES must access radio repeaters located at the CommCenter site. Repeaters are electronic devices that extend the range of the communications equipment located at the OES. A staff member of the OES reported to the Grand Jury that the effectiveness of the OES would be reduced by fifty to seventy-five percent if the CommCenter were disabled.

## **Vandalism**

In the past, the location of the CommCenter was isolated and remote. With only one difficult-to-find road leading to it, the chances of random acts of vandalism were few. Today, 756 homes are under construction to the south of the site, immediately adjacent to the CommCenter. The CommCenter, with its tall antenna towers, generators, and isolated outbuildings could be an attraction for vandalism.

## **Natural Disaster**

The CommCenter, including the antenna towers, was designed in accordance with the California Building Codes at the time of design and construction, and thus is considered earthquake resistant. However, Carol Drive is the only access road into and out of the facility. California State Route 87, a four-lane freeway, crosses over this access road just east of the intersection of Canoas Gardens Avenue and Sands Drive. In the event an earthquake were to cause a collapse of this overcrossing, all access to the site would be blocked. The emergency mobile communications bus, stationed at the site, would not be able to be deployed and facility personnel, called back for the emergency, would not be able to drive to the site for duty.

## **Accreditation and Standards**

The Insurance Services Offices' *Fire Classification Schedule* accredits the CommCenter. This schedule rates fire services, water, fire communications, and codes and ordinances. It does not rate or accredit security.

The Commission on Accreditation for Law Enforcement Agencies, Inc., (CALEA) was created as a credentialing authority through the joint efforts of the International Association of Chiefs of Police, the National Organization of Black Law Enforcement Executives, the National Sheriffs' Association and the Police Executive Research Forum. CALEA has developed *Standards for Public Safety Communications Agencies* that must be met in order to achieve accreditation. CALEA Standard 6.4.1 states:

Security measures for the communications center are in place to: a. limit access to the communications center to authorized personnel; b. protect equipment; c. provide for backup resources; d. provide security for transmission lines, antennae, and power sources; and e. provide evacuation plan, which includes the transfer for responsibilities and services to an alternate site.

Membership in and accreditation by CALEA is voluntary. The CommCenter is not accredited by CALEA.

The National Fire Protection Association (NFPA) has developed *NFPA 1221: Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems*, current edition 2007. *NFPA 1221* is very detailed, containing extensive communications center security standards. The standard also includes references to seismic standards contained in *NFPA 5000: Building Construction and Safety Code*. The CommCenter has not been evaluated to either of these standards.

## **Funding**

There were 39 deficiencies identified by the Grand Jury and an additional 18 by the Sheriff's Threat Assessment Report. Many of these have been corrected from funds available in the CommCenter operations budget. The Sheriff's report provides information as to the status of the longer-term funding for the more cost-intensive projects. A \$48,500 grant from the U.S. Department of Homeland Security for two of the items on the Sheriff's recommended enhancement list has been received. Purchase orders for the materials are being prepared. Funding for one additional recommended enhancement has been requested for the 2007-2008 Fiscal Year Capital Project Approval Process. A budget request for the correction of the remaining security deficiencies has not been submitted to the BOS. In light of the County's current budget problems, unless an emergency appropriation is granted by the BOS, these crucial security upgrades will go unaddressed.

## **Conclusions**

The CommCenter is vulnerable to physical damage from terrorism, vandalism, and natural disaster. Loss of the CommCenter would lead to serious harm to the public. This conclusion is based upon on-site security evaluations by the Grand Jury and by the Sheriff's Special Operations Section. The CommCenter is not held to any external standards for the security of communications centers.

Funding for two of the recommended security enhancements has been limited to a grant from an external agency. To date, a funding request to correct a third deficiency has been submitted to the BOS but has not yet been approved. Immediate funding by the BOS to rectify all the security deficiencies is necessary for the protection of this vital asset. Funding by the BOS may enhance the chances of gaining additional funding from grant organizations.

## Findings

The following findings were reviewed with the subject agency:

- F1:** The CommCenter is vulnerable to threats from terrorism, vandalism, and natural disaster. The loss of the CommCenter would lead to serious harm to the public.
- F2:** Funding has not been granted to cover all of the security deficiencies listed in the Sheriff's *Santa Clara County Communications Threat Assessment Report* and the Grand Jury's *Santa Clara County Security Assessment Results*.
- F3:** Although the CommCenter is not accredited for security by any external agency the threat assessment conducted by the Sheriff's Special Operations Unit is thorough and sufficient in determining site vulnerabilities.

## Recommendations

The 2006-2007 Civil Grand Jury recommends that the Santa Clara County Board of Supervisors and the Director of the CommCenter take the following actions:

- R1:** Approve and implement the security enhancements listed in the Sheriff's *Santa Clara County Communications Threat Assessment Report* and the Grand Jury's *Santa Clara County Security Assessment Results*, along with the construction of a second access road.
- R2:** The BOS should approve funding, on an emergency basis, to correct all the security deficiencies identified in the Sheriff's *Santa Clara County Communications Threat Assessment Report* and the Grand Jury's *Santa Clara County Communications Center Security Assessment Results*, along with funding to construct a second access road.
- R3:** The BOS should request the Sheriff's Special Operations Section to conduct an annual Sheriff's Threat Assessment. This annual report should go to the BOS, the Office of the County Executive, and the Communications Director, County Communications Department.

## Bibliography

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- Santa Clara County Civil Grand Jury. *Facility Tour/Inspection Evaluation, Santa Clara County 911 Communications Center*, September 27, 2006.
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- Santa Clara County Civil Grand Jury. Letter to Office of the County Executive, Communications Department, February 26, 2007.
- Santa Clara County Civil Grand Jury. Letter to Office of the County Executive, Communications Department, March 6, 2007.
- Santa Clara County Civil Grand Jury. *Santa Clara County Communications Center Security Assessment Results*, November 7, 2006.
- Santa Clara County Office of the Sheriff. *Santa Clara County Communications Threat Assessment Report*, January 11, 2007.

## **Visitations and Interviews**

September 27, 2006	Tour of CommCenter
November 7, 2006	Security inspection of CommCenter
November 27, 2006	Interviewed CommCenter management personnel
November 30, 2006	Interviewed Santa Clara County Office of Emergency Services, management and technical personnel
April 16, 2007	Validation of Findings with CommCenter management personnel
April 23, 2007	Validation of report with Santa Clara County Office of the Sheriff personnel

## **Acronyms and Definitions**

BOS	Santa Clara County Board of Supervisors
CALEA	Commission on Accreditation for Law Enforcement Agencies
County	Santa Clara County
CommCenter	Santa Clara County Communications Center
Grand Jury	Santa Clara County Civil Grand Jury
NFPA	National Fire Protection Association
OES	Santa Clara County Office of Emergency Services
Sheriff	Santa Clara County Office of the Sheriff

**PASSED** and **ADOPTED** by the Santa Clara County Civil Grand Jury on this 1<sup>st</sup> day of May 2007.

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Ronald R. Layman  
Foreperson

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David M. Burnham  
Foreperson Pro tem

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Kathryn C. Philp  
Secretary