

ISLAND SECURITY POLICY INSTITUTE

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POLICY BRIEF

Continuity Without a Continent

Redesigning COOP for Island Government Agencies That Cannot Relocate Essential Functions

Research Pillar: Emergency Preparedness & Island Resilience

Document Type: Policy Brief

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Published: 2026

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Keywords: COOP island government, continuity of operations Pacific Islands, island government emergency planning, COOP Hawaii agencies, government continuity planning Pacific territory, FEMA COOP island

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EXECUTIVE SUMMARY

- **Federal COOP guidance assumes the ability to relocate essential functions to a geographically separated alternative facility — a structural impossibility for single-island government agencies.**
- **Shelter-in-place continuity and digital continuity infrastructure are the only viable primary COOP strategies for island government agencies — not fallback options.**
- **Island government COOP failures during major emergencies document the same structural gap across every event: continental frameworks applied to island geographic constraints.**

When Hurricane Maria destroyed Puerto Rico's power grid in September 2017, the government of Puerto Rico faced a COOP failure with no mainland analog: the alternative operating facility identified in their continuity plan had also lost power. The mutual aid agreement named agencies on the U.S. mainland that were 1,600 miles away and not yet activated.¹ Federal COOP guidance — including FCD 1, FCD 2, and FEMA's Continuity Guidance Circular — is written for continental government organizations. Island government organizations cannot achieve the geographic separation these frameworks require.

Redesigning COOP for Island Reality

For island government agencies, the primary COOP strategy must be shelter-in-place continuity — the ability to maintain essential functions from the primary facility under degraded infrastructure conditions. This requires hardening the primary facility, pre-positioning supplies and power generation, and establishing communication redundancy at the primary location. Cloud-based essential function systems accessible from a ruggedized satellite terminal provide genuine operational continuity that a paper COOP plan citing an unreachable alternative facility does not.²

Policy Recommendations

1. Reform federal COOP compliance requirements for island and non-contiguous territory government agencies to recognize shelter-in-place continuity and digital continuity infrastructure as primary compliance pathways.
2. Fund island-specific COOP infrastructure investment — hardened primary facilities, pre-positioned power generation, ruggedized communication systems — for Pacific Island territory governments through reformed FEMA continuity grants.

3. Commission ISPI to develop an Island Government COOP Framework as a practitioner-grounded supplement to federal COOP guidance designed for island geographic realities.

NOTES AND REFERENCES

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The Island Security Policy Institute (ISPI) is a nonprofit, nonpartisan research organization based in Honolulu, Hawaii. ISPI produces practitioner-led research, policy analysis, training programs, and commissioned research on public safety, emergency preparedness, insider threat, and security policy for island and coastal communities worldwide. ISPI is registered as a federal contractor on SAM.gov under NAICS 541720. Warren Pulley, Founder & Executive Director.

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