



## Policy & Services Committee Staff Report

**From: City Manager**

**Report Type: ACTION ITEMS**

**Lead Department: City Auditor**

**Meeting Date: April 8, 2025**

Report #:2410-3635

### **TITLE**

Receive Update on City of Palo Alto Emergency Preparedness for Wildfires and Recommend City Council Approval of the Emergency Preparedness: Wildfire Audit Report by the City Auditor – Late Packet Report

### **RECOMMENDATION**

Staff recommend that the Policy & Services Committee: Receive an update regarding wildfire preparedness for City operations and receive and recommend City Council approve the BakerTilly Emergency Preparedness: Wildfire Audit Report.

### **EXECUTIVE SUMMARY**

Palo Alto, like many communities in California, faces increasing wildfire risks due to climate change, prolonged drought, and human activity in the wildland-urban interface (WUI), and this report is one item in a series of a series of public engagement and public meetings to raise awareness of local wildfire risks and the importance of wildfire preparedness. This report provides a summary of recent wildfire preparedness activities underway and new items such as the newly released wildfire maps released by the California Fire Marshal and transmits an audit on wildfire preparedness completed by BakerTilly, the City's Auditor. The findings of an independent audit conducted by BakerTilly reviewed the current wildfire protection plans implemented by the City and evaluated their effectiveness in mitigating wildfire risks and ensuring adequate emergency response. The audit identified areas for improvement in evacuation planning and enhancing community engagement. This report recommends that the Committee recommend the City Council approve the audit and recommendations within.

### **BACKGROUND**

In response to increasing wildfire risks, the City has developed various wildfire protection plans and strategies and takes a regional approach to planning efforts. Coordination and alignment with County and State agencies is key to ensuring responsible agencies can work together in an emergency. Mutual aid agreements with neighboring jurisdictions to enhance firefighting

capabilities during large-scale incidents are critical to incident response as no single agency has the resources to respond to a wildfire incident independently.

As noted in the Audit, the City has several planning documents from Utilities, Fire, and Office of Emergency Services to support planning and incident management of wildfire threats in the City of Palo Alto. The existing Emergency Operations Plan (EOP) is currently going through an update. The Wildland Urban Interface (WUI) Fire Response plan is part of the EOP planning cycle. The Utilities Wildfire Mitigation Plan is updated annually, and most recent updates were adopted in June 2024. Below is a comprehensive list of the City's emergency plans relevant to wildfires:

- Emergency Operations Plan Basic Plan (EOP)
  - Emergency Operations Center Manual (EOC)
- Wildland Urban Interface (WUI) Fire Response
- Local Hazard Mitigation Plan (LHMP)
- Foothills Fire Management Plan (FFMP)
- CPAU Wildfire Mitigation Plan
- Santa Clara County Community Wildfire Protection Plan (CWPP)

A number of legislative initiatives are also being tracked as wildfire preparedness, response, and recovery are topics the state legislature is actively concerned with in the wake of the January 2025 wildfires in southern California.

## **ANALYSIS**

After the January 2025 southern California wildfires, this agenda item was expanded to discuss two parts, 1) Wildfire Preparedness Activities and 2) Summary and Response to the Emergency Preparedness – Wildfire Audit (conducted in 2024, prior to the recent events). Recognizing the importance of communications, education, and preparation, in collaboration with the City Auditor, this expansion is in alignment with the launch of a series of items to raise awareness of local wildfire risks and the importance of wildfire preparedness.

### **Wildfire Preparedness Activities**

Wildfire planning, a continued City Council priority objective, is a cross-cutting initiative within the City with key roles in: Fire, Utilities, Office of Emergency Services (OES), and Public Works Departments. As an example, the Foothills Fire Management Plan/Community Wildfire Protection Plan (FFMP/CWPP), a multi-year plan with OES, Fire Department, Public Works, Utilities, Community Services Department coordinated via the Foothills Fire Management Team (aka Foothills Wildfire Coordination Team), is a 2025 Council priority objective to be completed in summer 2025. The 2024 City Council priority objectives demonstrated this continual effort through Objectives 70 and 71: Approve updated Local Hazard Mitigation Plan and Update

Foothills Fire Management Plan & Community Wildfire Protection Plan, respectively. Below outlines recent wildfire preparedness activities recently completed or under way organized by

- preparation and planning,
- multijurisdictional initiatives, and
- mitigation and prevention efforts.

#### Emergency Preparedness & Planning:

*Local Hazard Mitigation Plan (LHMP) & Santa Clara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP):* Office of Emergency Services (OES) with the County updated emergency plans, including the Palo Alto LHMP. The Santa Clara County MJHMP, Volume I and the associated Jurisdictional Annexes, Volume II, was approved by the State and by FEMA and City Council adopted Volume I and The Palo Alto Annex to Volume II on October 7, 2024 in alignment with the Council 2024 priority objective.

*Emergency Operations Plan (EOP):* The City's Emergency Operations Plan (EOP) is currently undergoing a review and update process including community engagement and feedback. This process ensures the City has the planning, policies, and concept of operations to guide responsibilities for emergency preparedness, prevention, response, recovery, and mitigation for the City of Palo Alto.

*Local Responsibility Area Hazard Severity Zone Maps:* To better prepare for wildfires, the California Department of Forestry and Fire Protection (CAL FIRE) is required to classify the severity of fire hazard in areas throughout California. In response, the State is releasing Fire Hazard Severity Zone (FHSZ) maps in phases and released Palo Alto's maps at the end of February. Portions of Palo Alto, generally west of Junipero Serra Blvd/Foothill Expressway have been identified as moderate, and areas in the Palo Alto Hills as high or very high Fire Hazard Severity Zones. The maps are like flood zone maps, noting factors such as fire history, existing and potential fuel (natural vegetation), terrain and weather patterns.

Our local fire agency does not control the creation of the map but is required to ensure the community can review and provide feedback within 30 days of the map's release, and within 120 days, the City Council is required to adopt the ordinance approving the map designations. Public Comment period is now open through April 26, 2025<sup>1</sup>, and the maps will tentatively be brought forward to the City Council for approval on June 2, 2025.

This map can affect land use planning, building codes, and wildfire mitigation strategies. The maps could also trigger additional inspections by the Palo Alto Fire Department and weed abatement requirements to increase wildfire protection and safety. They will also improve our hazard analysis as it pertains to the City's Community Wildfire Protection Plan/Foothills Fire

---

<sup>1</sup> State Fire Hazard Maps Released for Public Comment: <https://www.cityofpaloalto.org/News-Articles/City-Manager/Palo-Alto-Begins-Wildfire-Preparedness-Public-Discussions>

Management Plan efforts, Local Hazard Mitigation planning, Comprehensive Plan programs and policies, and community education to reduce personal exposure and risk. The Electric Utility Engineering will be evaluating grid hardening measures in the expanded zones including the alternative to move the overhead electric lines undergrounding to mitigate wildfire risk.

*Utilities Wildfire Mitigation Plan 2025 Update:* Annually, staff work to review and update the Palo Alto Utilities Wildfire Mitigation Plan and present it to the Utilities Advisory Commission for approval, currently expected by the end of FY 2025. This plan, in compliance with Public Utilities Code section 8387, describes how the utility is to maintain and operate electrical lines and equipment to mitigate wildfire risk posed by electric lines and equipment. The City strives to ensure that its infrastructure is safe and resilient by taking proactive actions to maintain its equipment, refine the existing Public Safety Power Shutoff (PSPS) protocols as needed, and underground the electric lines in the only high fire threat area. As part of the Wildfire Mitigation Plan 2025 Update, Palo Alto Utilities will be expanding the Public Safety Power Shutoff Communications to customers that fall within the expanded State Fire Marshall's Fire Hazard Severity Zones.

#### Multijurisdictional Approach:

When planning for an emergency event as significant as a wildfire, a multi-jurisdictional approach is critical, as no agency possesses the resources to successfully address an emergency event such as this independently. Staff is working on various efforts with other partner agencies and entities, which include not only emergency planning, but also early warning technology, and updating operational and procedural elements within the City organization to mitigate the risks associated with a fire in the foothills.

*Regional Training:* In June 2024, the Palo Alto Fire Department teamed up with Mountain View Fire, San Jose Fire, Santa Clara County Fire, and Alameda Fire agencies for an annual Wildland Safety Drill at Foothills Nature Preserve. This drill was all about sharpening skills in operational efficiency, communication, safety procedures, and resource familiarization, especially in the event where mutual aid is needed. This type of practice is vital to ensure that our teams are ready to seamlessly support each other. Efforts are already underway for a Santa Clara county-wide wildland training in May 2025.

*Santa Clara County FireSafe Council:* Staff is pursuing a service agreement to perform the schedule of required treatments each year in conjunction with some educational support. The Fire Department and OES are in the process of evaluating certain remote fire detection equipment in cooperation with the FireSafe Council and local partner agencies as well.

*Tabletop Exercise:* Staff are working to support efforts by the Santa Clara District - Division of Drinking Water of the State Water Resources Control Board (SWRCB) to perform a tabletop exercise of the water utility prior to the 2025 wildfire season.

## Prevention Efforts:

*Fuel Reduction Activities:* The City is contracting with the Santa Clara County FireSafe Council to perform fuel reduction along Page Mill Road and Arastradero Road in 2024 and pursuing a multi-year contract for broader fuel reduction work over a 3-5 year time horizon. Additionally, the Public Works department completed fuel reduction work prescribed in the FFMP for Los Trancos Road in May 2024 and the Community Services Department is performing the annual treatments<sup>2</sup> in Arastradero and Foothills Nature Preserves. Staff expects to request additional capital funding in FY 2026 to continue to address eucalyptus tree fuel reduction.

Palo Alto Fire Department has completed their annual wildfire urban interface (WUI) residential inspections in 2024 and Utilities continues to prioritize vegetation management around power lines to prevent contact and potential ignitions.

*Installed Sensor Technology:* Twelve N5 Sensors<sup>3</sup> were installed in the Foothills to detect the earliest stages of wildland fire, as well as track fire movement, smoke and monitor hazardous air quality. PAFD and OES are collaborating with the Santa Clara County FireSafe Council, Woodside Fire Protection District, Stanford University and the Department of Homeland Security to install a total of 50 sensors in the wildland urban interface areas in Palo Alto, Stanford and Woodside Fire District.

*Utility Systems (electricity & water) Hardening & Backup:* Hardening of the electric system in the WUI may include but is not limited to replacing overhead lines with underground cables and upgrading equipment to improve reliability. Both the significant investment in modernizing the electricity grid and undergrounding the electricity transmission line in the foothills are significant infrastructure adaptations to harden the system to wildfire risks. An easement for continuing to underground the transmission line in the foothills is expected to return to Council in June 2025 after approval by Mid-Peninsula Open Space Agency. Two new portable diesel backup generators were purchased in January 2025 for the Park and Dahl Foothill Booster Water Pump Stations ensuring there are now portable generators at all five Foothill Booster Water Pump Stations.

## **Summary and Response to the Emergency Preparedness – Wildfire Audit**

Baker Tilly, in its capacity serving as the Office of the City Auditor (OCA), performed a citywide risk assessment that assessed a wide range of risk areas, including strategic, financial, operational, compliance, technological, and reputation risks. The purpose of the assessment was to identify and prioritize risks to develop the annual audit plan. Recognizing the need for an

---

<sup>2</sup> Treatments refers to reduction in fuel, or vegetation and other combustible materials, and the management of the fuel through strategies such as mowing, clearing, or even animal grazing to reduce the fuel available.

<sup>3</sup> Wildfire Sensors: <https://www.cityofpaloalto.org/Departments/Fire/Prepare-For-Wildfire-READY-SET-GO/Wildfire-Sensors>

independent assessment of the City's wildfire preparedness, BakerTilly conducted an audit in alignment with its 2024 Risk Assessment and subsequent Council approved workplan.

The objective of the Emergency Preparedness – Wildfire Audit aimed to determine whether the City is adequately prepared to prevent and respond to wildfires as part of its overall emergency management plan. The attached BakerTilly Audit Report (Attachment A) provides a detailed analysis of the City's current practices and recommendations for improvement. The OCA interviewed staff, reviewed policies and procedures as well as FEMA and CAL FIRE standards and best practices to complete this audit work.

The BakerTilly Audit Report highlights two findings:

1. While the City has made significant investments in and has strong programs aimed to prevent and mitigate wildfire risks; we noted some areas for improvement including enhancing community outreach and engagement.
2. Overall, the City has a strong emergency response plan but should consider if improvements could be made to evacuation planning, training, after action report recommendation implementation, and communication efforts.

The attached report summarizes the analysis, audit findings, and recommendations. The audit identified areas for further improvement in evacuation planning and enhancing community engagement regarding these activities. Management has provided responses in the Appendix.

## NEXT STEPS

As noted in the summary, the City is preparing a series of engagements regarding wildfire preparedness and fire services. The calendar below provides a summary of engagements expected discussing fire services, wildfire activities, emergency services planning, and utilities activities.

Month	Activity
March	<ul style="list-style-type: none"><li>California Fire Marshal updated wildfire risk maps for public comment (released on City webpage 3/26)</li></ul>
April	<ul style="list-style-type: none"><li>Finance Committee review Fire Department Staffing Options on April 1<sup>4</sup>, continuing discussion from November 2024 exploring changes to enhance fire and ambulance service delivery.</li><li><b>Policy &amp; Services review of Emergency Preparedness - Wildfire Audit on April 8.</b></li><li>State Fire Hazard Map public comment period is now open through April 26. Council will consider adoption of an ordinance incorporating map designations tentatively on June 2.</li></ul>
May	<ul style="list-style-type: none"><li>Utilities Advisory Commission will review the 2025 Utilities Wildfire Mitigation Plan at their meeting in May or June.</li></ul>

---

<sup>4</sup> Finance Committee, April 1, 2025, Agenda Item #3,  
<https://cityofpaloalto.primegov.com/meetings/ItemWithTemplateType?id=7399&meetingTemplateType=2&compiledMeetingDocumentId=13598>

	<ul style="list-style-type: none"> <li>Finance Committee will review the preliminary Fiscal Year 2026 operating and capital budget recommendations on May 6 and 7, including fire staffing budget proposals, and capital funding to advance additional wildfire fuel reduction in the City's Open Space Preserves.</li> </ul>
<b>June / summer</b>	<ul style="list-style-type: none"> <li>City Council will consider approval of an easement in the Palo Alto foothills to support continued undergrounding of the electric transmission line (upon approval by Mid-Peninsula Open Space District).</li> <li>The City's Foothills Fire Management Plan updates and the Santa Clara County Community Wildfire Protection Plan, a combined effort, will be finalized.</li> <li>City Council will hold annual hearing on properties assessed for Weed Abatement work.</li> </ul>
<b>Beyond</b>	<ul style="list-style-type: none"> <li>City Council adoption of the updated Emergency Operations Plan</li> </ul>

### **FISCAL/RESOURCE IMPACT**

Implementing activities such as hardening systems and undergrounding the electricity transmission line in the foothills are within existing capital improvement plans and funding.

Acquisition of new equipment and technology is reviewed and evaluated as it arises in the context of the various plans, most currently as part of the Foothills Fire Management Plan/Community Wildfire Protection Plan (FFMP/CWPP) a multi-year plan.

The City will also explore potential funding sources, such as grants from federal and state agencies, to offset the costs of implementing wildfire preparedness plans.

The timeline and resource needs for implementation of management's corrective action plans are identified by management within the attached responses.

### **STAKEHOLDER ENGAGEMENT**

The Office of the City Auditor worked with and would like to thank several departments for their assistance in conducting this audit including: City Manager's Office, Public Works, Fire Department, Office of Emergency Services, and Palo Alto Utilities.

### **ENVIRONMENTAL REVIEW**

Council action on this item is not a project as defined by CEQA because reviewing and approving audit findings is an organizational or administrative activity of government that will not result in direct or indirect physical changes in the environment. CEQA Guidelines section 15378(b)(5).

### **ATTACHMENTS**

Attachment A: Emergency Preparedness - Wildfire Audit Report

### **APPROVED BY:**

Kate Murdock, City Auditor & Kiely Nose, Assistant City Manager