

March 31, 2025

# City of Palo Alto

Office of City Auditor

Emergency Preparedness – Wildfire Audit

# Contents

<b>EXECUTIVE SUMMARY .....</b>	<b>1</b>
<b>INTRODUCTION .....</b>	<b>4</b>
<b>DETAILED ANALYSIS .....</b>	<b>7</b>
<b>AUDIT RESULTS.....</b>	<b>9</b>
<b>APPENDIX A MANAGEMENT RESPONSE MATRIX .....</b>	<b>25</b>



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# Executive Summary

## Purpose of the Audit

Baker Tilly Advisory Group, LP (Baker Tilly), in its capacity serving as the Office of the City Auditor (OCA) for the City of Palo Alto (the City), conducted an Emergency Preparedness – Wildfire Audit based on the approved Task Order 4.25. The objective of this audit was to determine whether the City is working to prevent wildfire and adequately prepared to respond to wildfire as part of the City’s emergency management plan.

## Report Highlights

**Finding 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.**  
(Page 13)

- The City of Palo Alto Utilities Department (CPAU) has made significant investments to reduce wildfire risk
  - Undergrounding distribution lines – the City is in the process of undergrounding its main distribution line in the Foothills high-risk area to reduce the potential for wildfire caused by damaged or downed lines.
  - Installing weather stations – to collect localized weather data to share with first responders.
  - Public Power Shutoff Procedure – provides guidance for when to de-energize lines when needed to reduce wildfire risk and communicating information to the public.
  - Formalizing Utility Infrastructure Maintenance Program – CPAU is in the process of formalizing its utility infrastructure maintenance program which will help guide and prioritize the utilities maintenance efforts
  - Use of FLIR cameras – to detect electrical hotspots and areas that may require maintenance
- The City has several programs to address vegetation management and improved tracking efforts may increase compliance
  - Line Clearance Program – this program is managed by the Urban Forestry division of the Public Works Department in collaboration with CPAU and ensures vegetation is cleared from electrical equipment and utility lines. OCA noted areas to improve documentation of work scheduled and performed and overall program guidance
  - Property inspections in the Wildland Urban Interface (WUI) help ensure properties in high-fire danger areas are cleared of vegetation that could potentially fuel a wildfire. OCA noted areas for improved tracking and follow-up for properties that are in violation of the City’s code.
- While the City has partnered with CAL FIRE and is included in Santa Clara County’s Community Wildfire Protection Plan, community involvement could be enhanced with the establishment of Palo Alto as a Firewise Community, a

program that offers a structured approach for communities to enhance their wildfire resilience and promotes collaboration between residents, fire departments and other stakeholders.

- Community education and outreach could be enhanced by policies and procedures to guide efforts and track and measure their effectiveness.

### Key Recommendations

We recommend the City consider the following improvements to enhance its wildfire prevention efforts:

1. Continue efforts to underground Wildland Urban Interface (WUI) distribution infrastructure and prioritize, as appropriate, maintenance and possible replacement of the oldest utility poles should they remain in place.
2. Line Clearance policy documents should be established and or reviewed, updated and finalized (e.g. Draft Tree and Landscape Technical Manual)
3. Continue efforts to better track and monitor property violations in the WUI to enhance enforcement.
4. Prioritize efforts to establish a Firewise Community including stakeholder engagement throughout the process
5. Formalize the contract with CAL FIRE to ensure service provision continues into the future.
6. Ensure wildfire education and outreach plans document coordination efforts between the Office of Emergency Services (OES), Fire and CPAU to ensure information is consistently and regularly provided to residents.

### Finding 2: (Page 15)

**Overall, the City has a strong emergency response plan but should consider if improvements can be made to evacuation planning, after action report recommendation implementation, and communication efforts.**

- The City has a comprehensive set of emergency response and wildfire plans, but should consider if evacuation plans could be enhanced and some plans may require updating and review.
  - Overall, OCA found that the City's plans align with the majority of Federal Emergency Management Agency (FEMA) guidance; however, they would be strengthened by incorporating a more comprehensive revision history and an enhanced review process to ensure that plans are regularly reviewed and updated. In addition, while the Foothills Fire Management Plan (FFMP) addresses evacuation routes and ensuring these routes remain clear for emergency personnel as well as residents for evacuation, we recommend the City consider additional planning activities based on the U.S. Department of Homeland Security's, *Planning Considerations: Evacuation and Shelter-in-Place; Guidance for State, Local, Tribal, and Territorial Partners, July 2019.*

## EXECUTIVE SUMMARY

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- The City monitors training requirements and compliance and recently implemented a new sign-in process to improve tracking.
- While the City conducts training and after-action reports (AAR) after critical incidents, efforts to track and implement resulting recommendations could be improved.
- The City is enhancing its wildfire detection capabilities through the use of gas monitoring sensors deployed in the Foothills area.
- The City employs several methods for communicating critical information to its residents during an emergency and should continue to explore methods to increase participation in the County's emergency alerting system.
  - Based on the alert system sign-up data provided and Santa Clara County, 17% of Palo Alto residents were registered in the system in 2025.
- While the City has strong relationships with their mutual aid agreement partners<sup>1</sup>, the City does not maintain these agreements in a central repository for easy tracking and monitoring.

### Key Recommendations

We recommend the City consider the following improvements to enhance its Wildfire response efforts:

1. The City's emergency plans align with the majority of FEMA guidance; however, they would be strengthened by incorporating a more comprehensive revision history and an enhanced review process. The City should also review its evacuation plans and consider if plans could be enhanced by reviewing best practices in other cities such as establishing evacuation locations and sheltering agreements with neighboring communities.
2. City management should more formally track and monitor findings and recommendations identified during training exercises and in AARs of emergency incidents to ensure needed improvements are made and issues are timely resolved.
3. Continue to explore ways to increase resident registration in the County's emergency alerting system. Opportunities may include partnering with schools, homeowner associations, and local businesses to disseminate wildfire education materials and encourage participation in City programs and the County's emergency alert system.
4. Determine an appropriate solution for staff to more easily access, track and monitor the status of all mutual aid agreements, including active dates, renewal deadlines, and responsible contacts for updates. For example, a centralized tracking system for mutual aid agreements would provide clarity on the status of each agreement, preventing lapses in mutual aid coverage and ensuring that expired agreements are addressed promptly.

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<sup>1</sup> Mutual aid partners include Los Altos Hills, Santa Clara County, Woodside, Mountain View, and the California Department of Forestry and Fire protection.

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# Introduction

## Objective

The objective of this audit was to determine whether the City is working to prevent wildfire and adequately prepared to respond to wildfire as part of the City's emergency management plan.

## Background

The rise in wildfires in California is fueled by a complex interplay of climate change, historical land management practices, human activities, and ecological shifts, all of which impact cities like Palo Alto that are situated near high-risk wildland-urban interface (WUI) zones. Climate change has intensified the state's wildfire risk by driving higher temperatures, wind speeds, and drier conditions, which extend the fire season and increase the probability of fires. Historical land management practices, including the suppression of indigenous fire management techniques and aggressive fire suppression policies in the 20th century, have led to an accumulation of vegetative fuels. Additionally, logging practices have left denser forests prone to more intense fires. Human activities—ranging from infrastructure failures to recreational fires—are the primary sources of ignition, particularly as urban areas expand into WUI zones, increasing both the human and economic impact of fires.

In response to wildfire risks, the City of Palo Alto's Office of Emergency Services (OES), Fire Department, and City of Palo Alto Utilities (CPAU) are all actively engaged in wildfire preparedness, prevention, and response efforts, coordinating resources and community education initiatives to address these risks. The City works closely with CAL FIRE, regional partners, and neighboring cities to implement and refine emergency response plans, ensure effective evacuation routes, and conduct community outreach on wildfire preparedness. Recognizing the need for a multifaceted approach to wildfire mitigation, the City supports initiatives that promote sustainable land management practices, encourages defensible space in WUI zones, and advocates for policies to reduce human-caused ignitions. By fostering partnerships and promoting proactive wildfire safety measures, Palo Alto is dedicated to enhancing the city's resilience against the growing threat of wildfires in California.

The following table provides an overview of the City's various planning documents related to wildfire preparedness and response, as well as their purpose and when they were last updated.

**Table 1: City Emergency Preparedness Plans**

Title	Purpose	Date
Emergency Operations Plan Basic Plan (EOP)	The EOP embraces the FEMA "whole community" approach. According to the EOP, the City has undergone multiple hazard analysis processes per the FEMA Comprehensive Preparedness Guide 201. The EOP also states the City actively manages training activities and allocates funding in relation to fluctuating needs, personnel turnover, and course availability.	January 2016*
Emergency Operations Center Manual (EOC)	The EOC wildland fire response is primarily addressed through the EOC activation, the plan's emphasis extends beyond immediate response to a broader, proactive strategy. According to the EOC the City prioritizes comprehensive hazard analysis and ongoing training aligned with state and national standards such as ICS, SEMS, and NIMS.	July 2021
Wildland Urban Interface (WUI) Fire Response	An annex to Palo Alto's EOP, focusing on WUI fire response. It aligns with state and national emergency management systems (SEMS and NIMS). The primary goals are to guide initial response planning, support the development of incident plans, and ensure coordinated interagency actions.	August 2023
Local Hazard Mitigation Plan (LHMP)	The LHMP is part of the larger Santa Clara Operational Area Hazard Mitigation Plan and has a Palo Alto Annex. The LHMP details potential hazards for Palo Alto and provides recommended action on the hazards.	October 2024
Foothills Fire Management Plan (FFMP)	The FFMP focuses on mitigating wildfire risks in the Foothills area through targeted vegetation management and strategic planning. The document highlights accomplishments since the initial 2009 plan, including improved evacuation routes, prescribed burns, and reduced fire hazards near critical infrastructure. The update emphasizes ongoing efforts like annual maintenance of treated areas, collaboration with regional agencies, and leveraging funding opportunities. The plan includes post-treatment fire behavior analysis, showcasing how vegetation management efforts have improved emergency access and reduced the likelihood of wildfire spread.	January 2017
CPAU Wildfire Mitigation Plan	The CPAU Wildfire Mitigation Plan focuses on minimizing the risk of wildfires caused by electric lines and infrastructure. Key strategies include undergrounding power lines in high-risk areas, such as the Foothills region, updating Public Safety Power Shutoff (PSPS) protocols, enhanced vegetation management, and the use of advanced technologies like non-expulsion fuses and remote deenergization switches. The plan emphasizes collaboration with other departments, such as Fire and Urban Forestry, to ensure comprehensive wildfire prevention efforts. Regular inspections, vegetation clearance exceeding regulatory standards, and continuous monitoring are highlighted as critical components. The plan includes performance metrics to track the effectiveness of mitigation efforts, ensuring proactive adjustments where needed.	June 2024
Santa Clara County Community Wildfire Protection Plan (CWPP)	The Santa Clara County CWPP aims to reduce wildfire risk by establishing cooperative relationships with federal, state and local stakeholders before an event occurs and developing pre-attack plans to enhance firefighter readiness and safety. The CWPP includes annexes which offer information and project recommendations specific to geographical planning areas. The City of Palo Alto is included as an annex. Communities are currently updating their annex plans.	August 2016

\* The EOP is being updated and expected to be complete by Q4 Calendar Year 2025 per management.

### Scope

The OCA evaluated the City's plans and efforts related to wildfire prevention and preparedness by assessing related activities and internal controls from FY2023 through FY2024 in the OES, Fire Department, and CPAU.

### Methodology

To achieve the audit objectives, the OCA performed the following procedures:

- Interviewed the appropriate individuals to understand the roles and responsibilities, processes, and controls related to Emergency Preparedness (Wildfire) activities.
- Analyzed current policies and procedures (P&P) as well as FEMA and CAL FIRE standards and best practices.
- Evaluated relevant documents such as City of Palo Alto EOC Manual, CPAU Wildfire Mitigation Plan, FFMP, and various other plans
- Gathered information and reports to assess if current City plans are sufficient in preventing and responding to wildfire risks.
- Inquired with OES departments for clarification and understanding of emergency plans.
- Completed audit report of findings, conclusions, and recommendations based on the supporting evidence gathered

### Compliance Statement

This audit activity was conducted from June 2024 to December 2024 in accordance with generally accepted government auditing standards, except for the requirement of an external peer review<sup>2</sup>. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### Organizational Strengths

During this audit activity, we noted the expertise and the responsiveness demonstrated by the Emergency Preparedness team. We also observed their willingness to provide and receive feedback regarding the emergency preparedness process, which includes their receptiveness to process improvements.

**The OCA greatly appreciates the support of the Fire Department, Office of Emergency Services, City Manager's Office, and City of Palo Alto Utilities Department in conducting this audit.**

***Thank you!***

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<sup>2</sup> Government auditing standards require an external peer review at least once every three (3) years. The last peer review of the Palo Alto Office of the City Auditor was conducted in 2017. The Palo Alto City Council approved a contract with Baker Tilly U.S., LLP for internal audit services for October 2020 through June 2022 with an extension through June 2025. City Council appointed Kate Murdock, Audit Manager in Baker Tilly's Risk Advisory practice, as City Auditor in May 2024. As a result of transitions in the Audit Office and peer review delays due to the COVID pandemic, an external peer review is targeted for 2025. It should be noted that Baker Tilly's most recent firmwide peer review was completed in October 2021 with a rating of "Pass". The scope of that peer review includes projects completed under government auditing standards. A report on the next firmwide peer review should be available later in 2024.

# Detailed Analysis

## Best Practices: Emergency Preparedness & Response

In its publication, *Developing and Maintaining Emergency Operations Plans*, FEMA highlights five key areas for communities to address related to Emergency Preparedness. These include:

- Prevention – reducing risk from human-caused incidents
- Protection – reducing or eliminating the threat to people and critical infrastructure
- Response – actions taken in the immediate aftermath of an incident
- Recovery – short-term and long-term efforts for rebuilding and revitalizing the affected community
- Mitigation – structural and non-structural approaches to eliminating or limiting the hazards presence

This audit report focuses on the first three areas as they relate to the audit objectives, but recognizes the City has efforts related to recovery and mitigation of wildfire risks too.

### Shared Community Preparedness themes

Additional best practice information comes from the National Incident Management System (NIMS) and CAL FIRE. NIMS offers guidance on resource management, mutual aid, and communication during emergency events. CAL FIRE provides guidance and best practices for wildfire events specific to Fire Hazard Severity Zones (FHSZ), further described below. Guidance from FEMA, NIMS, and CAL FIRE all emphasize the importance of the following principles in preparing communities for emergencies including wildfires. Common themes include:

- **Community Engagement:** Public education and participation are key to ensuring communities are informed and involved.
- **Response Coordination:** Implementing reliable policies for consistent response across agencies and stakeholders is key to NIMS ICS framework and mutual aid strategies with FEMA's planning and CAL FIRE's interagency collaboration.
- **Training and Communication:** Regular drills and clear communication protocols are critical to ensure preparedness and efficiency during emergencies.

FEMA offers additional guidance related to wildfire emergency preparedness. FEMA's best practices, as highlighted in their publication *Developing and Maintaining Emergency Operations Plans*. These best practices include:

- **Risk Assessment and Planning:** Conducting thorough risk assessments to identify potential wildfire hazards and developing comprehensive emergency plans that address these risks.

## DETAILED ANALYSIS

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- **Public Information and Warning:** Ensuring that timely and accurate information is provided to the public about wildfire risks, evacuation orders, and safety measures.

NIMS offers important recommendations for departments handling wildfire emergencies. These best practices include:

- **Communication and Information Management:** Implementing reliable communication systems and protocols to ensure timely and accurate information sharing during wildfire emergencies.
- **Incident Command System (ICS):** Utilizing the ICS to coordinate response efforts and manage resources effectively during wildfires.

CAL FIRE offers comprehensive guidance related to wildfire emergency preparedness. CAL FIRE's best practices provide essential recommendations for departments handling wildfire emergencies. These best practices include:

- **Fire Hazard Severity Zones (FHSZ):** Identifying and mapping areas with varying degrees of fire hazard severity to prioritize resources and mitigation efforts.
- **Evacuation Planning:** Developing and regularly updating evacuation plans to ensure that residents can safely and efficiently evacuate in the event of wildfire.

# Audit Results

## City Efforts to Prevent and Protect from Wildfire

**Finding 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.**

The City coordinates and collaborates across departments and with neighboring jurisdictions to prevent and protect the City and its residents from the risk of wildfire. These risk areas include utility infrastructure maintenance, vegetation management, and community outreach and education.

### **CPAU has made significant investments to reduce wildfire risk**

CPAU provides electricity to the entire Palo Alto service area including the Foothills/Wildland Urban Interface (WUI) Area and prepares and submits a Wildfire Mitigation Plan to the California Wildfire Safety Advisory Board each year. CPAU has invested in several projects to reduce wildfire risk including undergrounding distribution lines and installing weather stations. The Utility has also developed a Public Safety Power Shutoff (PSPS) procedure.

#### Undergrounding Distribution Lines

CPAU began the Foothills project to underground distribution lines in the Foothills high-risk area in 2021. This project, which will be completed in summer 2025, includes the undergrounding of approximately 49,200 feet of distribution lines. The project includes undergrounding the main 12470-voltage distribution line as well as fiber optic cable. Utility distribution lines pose a significant wildfire risk and undergrounding these lines largely eliminates this threat as lines cannot be damaged by trees or high winds which can spark fires by falling on vegetation below.

Based on information provided by CPAU, much of the overhead infrastructure within the Wildland Urban Interface (WUI), designated as the High Fire Threat Tier 2 zone, encompassing all city areas west of Highway 280, known as the "Foothills Area" will be undergrounded.

As part of City's wildfire mitigation strategy, CPAU has prioritized the undergrounding of its overhead infrastructure in the WUI/Foothills Tier 2 area. The Foothill Fire Mitigation Project includes the following key activities:

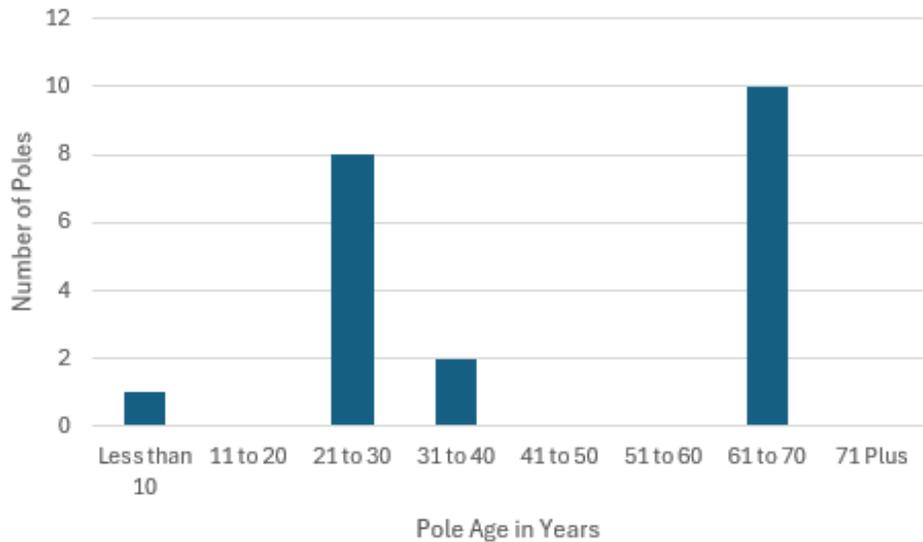
- Substructure construction, including the installation of boxes and pad-mounted equipment
- Cable pulling and line energization
- Decommissioning of overhead poles and equipment

According to CPAU, the Foothill Fire Mitigation Project is estimated to underground 182 of the total of 203 poles and overhead lines in the high-risk area. The estimated 21 remaining poles require additional coordination with pole attachers, and customers prior to either undergrounding or implementation of additional fire hardening measures. As of March 2025, CPAU management reported it has completely de-energized and undergrounded electric lines for 69 of the 182 poles, significantly reducing the wildfire risk associated with overhead power lines in the area.

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The table below shows the age of the remaining 21 poles that are not being removed as part of the initial Foothill Fire Mitigation Project.

**Table 2: Age of Remaining Poles in WUI**



\*Analysis conducted by the OCA in March 2025

The OCA saw a range of estimates on how long utility poles can last, anywhere from 35 to 75+ years depending on conditions and maintenance, which suggests CPAU should prioritize maintenance and possible replacement of the oldest poles should they remain in place.

Additionally, CPAU is implementing a multi-year Grid Modernization initiative that will enhance grid resiliency and reliability of the electric distribution system by replacing poles, transformers, aerial wires, some cabinets and underground substructure. The initiative also includes upgrades to two of their substations, with a target completion by 2032.

#### Weather Station Installation

CPAU installed weather stations in the Foothills area and at the Utility Control Center to collect localized weather data which is shared with first-responder departments to determine if any actions are needed due to conditions. The Utility also monitors regional conditions and receives red flag warnings which signal when fire conditions are heightened<sup>3</sup>.

#### Public Safety Power Shutoff Procedure

CPAU has a Public Safety Power Shutoff procedure which provides guidance for deciding when lines may need to be de-energized to reduce

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<sup>3</sup> [Red Flag Warning](#)

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wildfire risk and how best to communicate this information to the public. Residents in the Foothills area are notified via email when de-energization is anticipated and are typically provided with dates and shutoff times.

#### Forward Looking Infrared (FLIR) Cameras

In addition to visual inspections, CPAU utilizes FLIR Cameras which are used to detect hotspots where electrical equipment could be overheating and treat areas before they become a problem. This use of technology helps enable the City to proactively address maintenance issues.

#### **The City has several programs to address vegetation management and improved tracking of efforts may increase compliance**

Wildfires and their spread are dependent on several conditions, such as fuel load or the accumulation of vegetation, as well as weather conditions which determine their severity. The City has several programs and resources dedicated to managing vegetation including resident assistance programs. These programs include:

- Line Clearance Program
- Right Tree Right Place
- Property Inspections in the Wildland Urban Interface
- Santa Clara Fire Safe Council CAL FIRE

#### Line Clearance Program

The City's Line Clearance Program ensures vegetation is cleared from electrical equipment and utility lines, patrol to ensure access roads to facilities remain clear, and right-of-way clearing. The Program, typically completed via a contract with the Fire Safe Council (FSC), is managed by the operations division of the Public Works Department in the absence of a contract with FSC and in collaboration with CPAU. The City's aim is to maintain a 10-foot clearance from trees in the Foothills area which is in accordance with California law<sup>4</sup> and the California Public Utilities Commission.

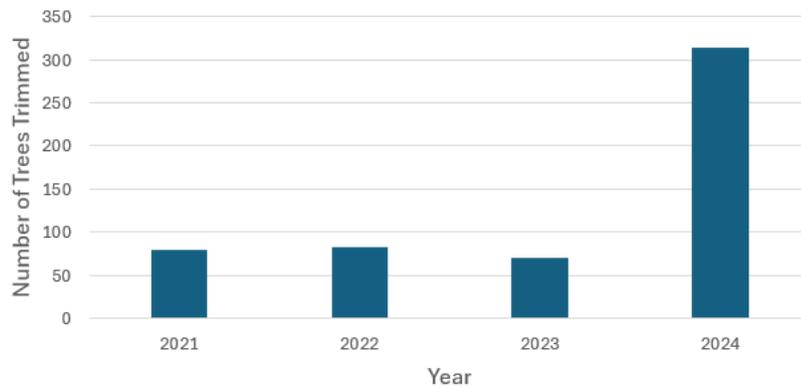
According to the City's Tree Management Plan and interviews with staff, the entirety of the Foothills area is inspected and cleared each year in the Spring with a follow-up inspection conducted in the fall. Staff stated that they have not experienced any resource constraints and major tree trimming occurs every 3 to 4 years. Compliance is maintained in intervening years through the biannual inspections and subsequent tree trimming. Tree trimming activities are tracked using a software program called TreeKeeper. Staff reported they do not currently track inspections but are working on how to capture them as a work record in TreeKeeper. The table below shows how many trees were trimmed in the Foothills area from 2021 to 2024.

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<sup>4</sup> [California Public Resources Code Section 4293](#)

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**Table 3: Number of Trees Trimmed in the Foothills Area from 2021 to 2024\***



\*Data analysis conducted by OCA in October 2024

Urban Forestry staff provided the OCA with two guiding documents: Urban Forest Master Plan and Draft Tree and Landscape Technical Manual. While the Urban Forest Master Plan provides overall guidance and includes information on the Line Clearance Program, the Draft Tree and Landscape Technical Manual provides information on what equipment and what environmental conditions to consider for conducting tree trimming to reduce the risk of ignition due to maintenance activities. Staff said that the Manual is intended as a supporting document to the City’s tree ordinance and its Fire-Safe Landscapes section provides residents with tree and landscaping guidance in support of creating a defensible space around one’s home against wildfire risk.

The OCA noted that this draft manual did not appear to be complete. For example, there were imbedded notes for staff to determine seasonal criteria for tree trimming. Overall, while these documents provide good information, they require updating, completion, and dissemination.

#### Right Tree Right Place Program

The Right Tree Right Place Program provides resources for residents with trees that conflict with power lines. The program includes removing trees at no cost, reimbursement for stump removal and reimbursement for replacing trees with appropriate tree alternatives.

#### Property Inspections in the Wildland Urban Interface

The City’s Fire Marshal oversees fire safety inspections of businesses and properties. These inspections ensure businesses and residents comply with California Fire Code and keep properties clear of fuel that could increase the risk of wildfire. When a property is found in violation of the Fire Code, they are issued a “Notice of Violation” and typically given a month to make corrections. If a property fails reinspection, the property may be referred to

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the Fire Prevention Bureau and potentially invoiced for any remediation or reinspection fees incurred by the City. The City also adopts a Weed Nuisance Abatement resolution annually and works in coordination with the County of Santa Clara to address properties with weeds that are deemed a nuisance and/or fire hazard.

Based on reports analyzed by the OCA, in 2023 there were 133 homes in Palo Alto's Wildland Urban Interface (WUI). Inspections were conducted for 104 of these homes and 86 of these passed the first inspection. However, it appears that only 3 homes were reinspected and 26 homes had outstanding violations at year-end. Management stated that this report needs to be cleaned up and there may be less than 133 properties in the Palo Alto WUI. In 2024, through the third quarter of the year, the City had performed 138 inspections in the WUI.

The City recently began using a new system to track fire inspections and management reported they are working with the City's Information Technology Department to develop more robust reporting capabilities so the Fire Marshal can more easily track metrics on how many violations have been issued, how many have been corrected, how many referred to the fire prevention bureau, etc.

With improved data tracking and reporting capabilities, the City will be able to better and timelier follow-up with businesses and residents who are not in compliance with the Fire Code and ensure wildfire risk is reduced.

#### Santa Clara Fire Safe Council

The City has a short-term contract with Santa Clara Fire Safe Council to help with roadside clearance work, public education, and pursuing grant opportunities. Staff stated that the City has introduced the Firewise program in the past through the Fire Safe Council, but the program has not had much traction and Palo Alto does not currently have a Firewise Community, a program that must stem from the impacted residents. The Firewise USA® program offers a structured approach for communities to enhance their wildfire resilience and promotes collaboration between residents, fire departments and other stakeholders. Establishing a Firewise program is also recommended for Palo Alto in the Santa Clara County Community Wildfire Protection Plan.

A core principle in Community Wildfire Protection Plans is to include as many agency representatives and resident leaders in the planning process as possible. The first goal in FEMA's *Creating a Community Wildfire Protection Plan* is to "Create fire-adapted communities" which includes pursuing Firewise site recognition, providing information to the community about fire safety, and reducing risks for home ignition. As stated in the CWPP, the City should strongly consider working with the local Foothills community to attain and maintain Firewise USA recognition.

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## CAL FIRE

CAL FIRE has provided assistance to the City over the past couple of years in clearing out vegetation in the Foothills area and including some areas with Eucalyptus trees. The City does not currently have a formal contract with CAL FIRE for these services, however, this is something they should consider ensuring for service provision in the future.

### **Community Education and Outreach could be improved.**

While the City has implemented various programs and trainings to promote the community's wildfire awareness and prevention efforts, there is room for improvement. Currently, there is no comprehensive policy or set of requirements established for the City's overall community outreach and education efforts to ensure sufficient information and education are provided to the residents for wildfire prevention and emergency preparedness. As a result, the City's overall community outreach and education efforts are not tracked to ensure goals are met.

#### **Limited efforts to measure education and outreach effectiveness**

According to management, community outreach and education responsibilities are shared between Fire Prevention and OES and the citywide communications team. Staff said efforts were tracked in the past, but they lost the position responsible for this activity and there are currently no P&P in place to guide the provision or tracking of education and outreach efforts. Staff indicated that recent efforts have not been well attended by residents, making it difficult to assess how engaged and prepared the community is to prevent and respond to wildfires.

CPAU also performs community education and outreach activities and includes wildfire information as part of its regular communications with customers. CPAU employs several methods for communicating with customers including utility bill inserts, email newsletter, direct mail, social media, and the CPAU website. While staff provided several examples of wildfire education efforts, they indicated there is no policy or plan outlining expectations or responsibilities for outreach and education efforts, how often they should be performed and/or how to determine what information gets shared. In accordance with State law, the Utility Wildfire Management Plan is presented annually in a public meeting to the Utilities Advisory Commission. Developing a guiding document with appropriate goals and targets could help ensure the utility consistently communicates with residents and could aid in tracking the effectiveness of these efforts over time.

#### **Some residents report a lack of wildfire preparedness education and a desire for more information related to City prevention efforts**

The City of Palo Alto's Community Survey results from 2023 support the observations above that the City could improve outreach efforts to community members. When asked about the quality of Palo Alto's fire prevention and education services, 37% of respondents in 2023 answered "don't know", 18% answered "fair" or "poor", and 45% answered "good" or "excellent". However, it should be acknowledged that this question is posed

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as broader “prevention” activities and does not specify wildfire prevention nor is the sample size specific to the WUI region.

In 2022, CPAU’s study of Key Account Customers found that 40% indicated being “very concerned” with future wildfires and a 2023 Residential Electric Customer Satisfaction Study reported that the second most desired topic of information (44%) is “what CPAU is doing to prepare for emergencies like wildfires and earthquakes.”

The City’s Fire Department conducts annual property inspections in the WUI to detect dangerous conditions that could contribute to or exacerbate wildfire risk. As noted above, our analysis of the fire inspection log from 2023 shows that 26 out of an approximate 133 homes in the WUI had outstanding violations and in 2024 more than 74 homes had violations. Annually doorhangers are provided to residents in this area. Additional measures such as education, outreach, and fines may help to reduce violations by informing residents of the dangers of excess vegetation and any maintenance or prevention related resources available to them. The Fire Department does maintain an online wildfire preparedness resource for community members:

<https://www.cityofpal Alto.org/Departments/Fire/Prepare-For-Wildfire-READY-SET-GO>.

## Recommendation

We recommend the City consider the following improvements to enhance its Wildfire prevention efforts:

1. Continue efforts to underground WUI distribution infrastructure and prioritize, as appropriate, maintenance and possible replacement of the oldest poles should they remain in place.
2. Line Clearance policy documents should be established and or reviewed, updated and finalized (e.g. Draft Tree and Landscape Technical Manual)
3. Continue efforts to better track and monitor property violations in the WUI to enhance enforcement.
4. Prioritize efforts to establish a Firewise Community including stakeholder engagement throughout the process
5. Formalize the contract with CAL FIRE to ensure service provision continues into the future.
6. Ensure wildfire education and outreach plans document coordination efforts between OES, Fire and CPAU to ensure information is consistently and regularly provided to residents.

## Management Response

Please see appendix for responses.

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## City Wildfire Response Plans

**Finding 2:  
Overall, the City has a strong emergency response plan but should consider if improvements could be made to evacuation planning, after action report recommendation implementation, and communication efforts.**

The City takes a proactive and collaborative approach in responding to and mitigating wildfire risks by coordinating closely across its own departments—such as the OES, Fire Department, CPAU, and Public Works—and with neighboring jurisdictions. These risk areas include Planning, Training, Detection, Communication, and Resources.

**The City has a comprehensive set of emergency response and wildfire plans, but the City should consider if evacuation plans could be enhanced and some plans may require updating and review**

The City has several plans that all work in conjunction with each other to ensure the City is prepared to respond to various disasters and hazardous conditions. In addition to internal plans, the City is part of Santa Clara County's Community Wildfire Protection Plan. We discuss several of the plans guiding the City's response approach, below.

The City has 6 plans related to wildfire.

- Overarching Emergency Operation Plans (EOP) which contains the annexes Emergency Operations Center Manual (EOC),
- Local Hazard Mitigation Plan (LHMP),
- Foothills Fire Management Plan (FFMP),
- Wildland Urban Interface Fire Response (WUI), and
- CPAU Wildfire Mitigation, which is a wildfire plan for the City Utilities Department.
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The EOP adopted by city council on January 11, 2016, states that it follows FEMA's "whole community" approach. The EOP in general follows the format laid out by FEMA. The revision history and certification of biennial review on the EOP are blank both on the EOP provided to auditor and on the City website, indicating that the plan has not been updated or reviewed in 8 years. The distribution section of the EOP does not adhere to FEMA's recommended format, which specifies that this section should be presented as a list. Management has identified that the EOP is currently undergoing review and update in 2025.

In the EOC, wildland fire response is primarily addressed through the EOC activation, the plan's emphasis extends beyond immediate response to a broader, proactive strategy. According to the EOC, the City prioritizes comprehensive hazard analysis and ongoing training aligned with state and national standards such as ICS, SEMS, and NIMS.

The LHMP is part of the larger Santa Clara Operational Area Hazard Mitigation Plan and has a Palo Alto Annex. The LHMP details potential hazards for Palo Alto and provides recommended actions to prepare for these hazards. This plan was recently adopted by the City Council in October 2024.

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The FFMP for Palo Alto focuses on mitigating wildfire risks in the Foothills area through targeted vegetation management and strategic planning. The document highlights accomplishments since the initial 2009 plan, including improved evacuation routes, prescribed burns, and reduced fire hazards near critical infrastructure. The update emphasizes ongoing efforts like annual maintenance of treated areas, collaboration with regional agencies, and leveraging funding opportunities. The plan includes post-treatment fire behavior analysis, showcasing how vegetation management efforts have improved emergency access and reduced the likelihood of wildfire spread. There is a monthly meeting with OES, CSD Open Space Division, Fire Marshal's Office, Public Works Operations, and Utilities Engineering to address and discuss current issues within the FFMP. The City is currently in the process of updating this plan.

The WUI focuses on WUI fire response and provides a concept of operations in the development of an effective and coordinated response to a significant wildland urban interface (WUI) Fire. This provides direction for city departments, community groups, and allied stakeholders ensuring interagency coordination in accordance with the City's EOP, the California Emergency Services Act, the Standardized Emergency Management System (SEMS), and the National Incident Management System (NIMS).

The CPAU Wildfire Mitigation plan focuses on minimizing the risk of wildfires caused by electric lines and infrastructure. Key strategies include undergrounding power lines in high-risk areas, such as the Foothills region, enhanced vegetation management, and the use of advanced technologies like non-expulsion fuses and remote deenergization switches. The plan emphasizes collaboration with other city departments, such as the Fire Department and Urban Forestry, to ensure comprehensive wildfire prevention efforts. Regular inspections, vegetation clearance exceeding regulatory standards, and continuous monitoring are highlighted as critical components. The plan also includes a performance metrics framework to track the effectiveness of these mitigation efforts, ensuring proactive adjustments where needed.

### **Areas for Improvement**

Overall, OCA found that the City's plans align with the majority of FEMA guidance; however, they would be strengthened by incorporating a more comprehensive revision history and an enhanced review process to ensure that plans are regularly reviewed and updated. In addition, while the FFMP addresses evacuation routes and ensuring these routes remain clear for emergency personnel as well as residents for evacuation, we recommend the City consider the following enhancements based on Homeland Security's, *Planning Considerations: Evacuation and Shelter-in-Place; Guidance for State, Local, Tribal, and Territorial Partners, July 2019*. This guidance highlights the following responsibilities for local jurisdictions:

- Setting clear expectations for whole community partners through education, training and information sessions,

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- Establishing and publishing clear evacuations routes and zones for the community,
  - Identify evacuation shelters within the community and in other communities working with those neighboring communities to establish notification and operational procedures,
  - Create pre-approved accessible messaging for rapid distribution regarding incident and shelter in place or evacuation instructions,
  - Have a continuity plan to help maintain response operations if interrupted, and
  - Provide real-time mapping and navigation routing systems through Geographic Information System (GIS).

Homeland Security's guide also highlights key lessons from past wildfire emergencies that occurred in Los Angeles County, CA and Larimer County, Colorado:

- Need for increased coordination for quicker incorporation of GIS data into analysis
- Identification of the safest evacuation routes combined with the use of multiple forms of communication to keep residents informed regarding timing and location of evacuated areas.
- Use of a tiered evacuation approach
  - First, direct residents out of an immediate impact zone to an evacuation point, out of danger, where additional information is provided,
  - Second, if the danger is prolonged, direct residents from the evacuation point to an evacuation center where water, food and power resources are available to charge mobile devices, and
  - Third, if overnight or multi-day evacuation is necessary, direct residents to shelters in nearby communities.

## Training

### **The City monitors training requirements and compliance and recently implemented a new sign-in process to improve tracking**

Fire, OES, and Police all serve critical functions in emergency response with different training requirements depending on their roles and responsibilities. In terms of wildfire response training, the Fire Department provides wildfire training through modules provided by Vector Solutions as part of an annual fire safety refresher course, RT-130 which is required per the National Wildfire Coordinating Group (NWCG) for designated positions for all personnel assigned with Fireline duties. The training is completed before the start of the Wildland season which typically runs from May to November but can vary from year to year. A new QR check-in system may have resulted in

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incomplete sign-ins and a battalion chief had not yet completed the training as of the writing of this report. There was a total of 77 employees signed up and as of August 29th, 2024, 71 had completed the required training. Out of the 6 who had not completed the training, five were due to workers' comp or medical issues. Management was unable to provide an explanation of why the remaining employee's training was not completed but noted that the individual received follow-up training to ensure understanding of training requirements and protocols. Management stated that a new check-in system is now in place and will help the City more easily track training compliance in the future.

The OES training primarily covers critical incident response, with minimal emphasis on wildfires. Finally, the Police Department does not have specific wildfire training. Instead, they focus on support roles during such incidents, including using police speakers for warnings, directing traffic, and ensuring clear roads.

### **After Action Reports (AAR)**

According to The National Wildfire Coordinating Group (NWCG) AARs are essential for wildland firefighters to learn from mistakes and capitalize on successes. The objective of the AAR is to immediately identify these successes and failures. Once they have been recognized, further exploration allows the team to perfect its skills and be better prepared for future endeavors. NWCG is a partnership of federal, state, tribal, and local wildfire management agencies that work together to establish standardized practices for wildland fire operations in the United States, its primary goal is to enhance efficiency, safety, and effectiveness in wildland fire management and response. The NWCG develops training programs, operational guides, and policy frameworks to ensure consistent and coordinated wildfire management across jurisdictions. It also serves as a central resource for promoting best practices, improving interagency collaboration, and supporting the professional development of fire personnel.

### **While the City conducts training and AARs after critical incidents, efforts to track and implement resulting recommendations could be improved**

All the departments come together to engage in tabletop exercises for training purposes. Departments also work together after critical emergency incidents to conduct AARs to report their successes and improvement opportunities. While some AAR recommendations have been implemented others have not and staff said they do not formally track and monitor the implementation of recommendations. Areas of improvement noted in training exercises and in AARs cover various areas such as communication, recovery and proper use of PPE.

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## ***Training Exercises***

### 2024 XSC Readiness Drill

A drill hosted by the County of Santa Clara to provide pre-incident training on bulldozer, hand crew, and helicopter operations during a wildfire. This event was attended by county-wide OES departments. Areas of improvement included:

- Creating clarity around the communications center and coordinating the process and flow of mutual aid initial attack orders.

### Vulcan Forge Tabletop Exercise

The City of Palo Alto Vulcan Forge Tabletop Exercise was intended to discuss and validate existing procedures. The drill provided an opportunity for City staff to exercise their role and gain a greater understanding of the processes and procedures that will occur during wildfire response. Areas of improvement included:

- The WUI ConOps is lacking specific procedures to reach those with limited English proficiency or for people with disabilities, and others with access and functional needs (DAFN)
- Participants didn't appear to know how best to alert residents who were experiencing power outages
- The WUI ConOps does not have a procedure for approving PIO to disseminate to the public
- Define terms such as "mass care" vs. "sheltering" to create clear understanding of evaluation points, centers, shelters, and the like
- Establish evacuation center and sheltering operation criteria, P&P and train appropriate staff
- Current plans lack sufficient detail on recovery and relief efforts
- OES needs to create P&P for re-entry and re-population

## ***After Action Reports***

### PAFD AAR Dish Fire

A fire of unknown origin started near the Stanford Hiking Dish Trail and the PAFD responded to put out the fire. The fire was in an area of the dish hiking trail that's nearest the intersection of lower Reservoir Road and the Stanford Hiking Dish Trail with the closest gate access being the Gerona Gate. Areas of improvement included:

- There was a delay in dispatching mutual aid and additional hands-on training was requested
- Proper PPE must always be worn when responding

OCA's analysis of training exercise notes and AARs found areas of improvement are often identified with suggestions for process improvements. The OCA recommends the City more formally track and

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monitor these findings and recommendations to better determine if they should be implemented, what resources may be needed, and to establish an appropriate timeline for implementation.

### **The City is enhancing its wildfire detection capabilities through the use of gas monitoring sensors deployed in the Foothills area**

Detection is crucial in wildfire emergencies because it enables early response, reducing the spread and potential damage of fires by allowing for quicker containment efforts. Early detection systems, such as remote sensors and aerial surveillance, are vital for protecting communities and natural resources, as they help agencies mitigate risks before fires escalate to dangerous levels.

The City recently set up N5 Sensors which are an advanced gas monitoring system designed to provide early alerts in the event of a wildfire. In a collaborative program, the City is partnering with Stanford and Woodside, with Stanford purchasing 25 N5 sensors and receiving an additional 25 at no cost. Of these, Palo Alto will receive 12 sensors, while Woodside will receive 13. Each city will cover its own data expenses, estimated at \$22,000 per city for the first two years. Palo Alto received a grant from the Department of Homeland Security to assist with the expenses. The Fire Safe Council will handle the sensor installation and program management. Although N5 Sensors will not provide complete coverage across all areas, they are strategically positioned to enhance early warning capabilities in high-risk zones. Additionally, the City has explored the use of drones for monitoring, but concerns over privacy, public perception, and restrictive municipal codes have made their approval challenging.

### **Communication**

#### **The City employs several methods for communicating critical information to its residents during an emergency and should continue to explore methods to increase participation in the County's emergency alerting system**

The City has established multiple communication channels such as the City's website, news releases, social media, and radio announcements to remind residents of wildfire season and keep them informed of the City's events and emergency notifications. City web pages dedicated to general emergency preparedness<sup>5</sup> and wildfire prevention include CAL FIRE's *Ready-Set-Go*<sup>6</sup> video, Palo Alto Wildfire Planning Map, evacuation information, a link to sign up for Santa Clara County's alerting system, and other resources.

Palo Alto utilizes Everbridge, the mass notification system used throughout Santa Clara County to communicate with residents in emergency situations.

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<sup>5</sup> <https://www.cityofpaloalto.org/Departments/Emergency-Services/Emergency-Preparedness>

<sup>6</sup> <https://www.cityofpaloalto.org/Departments/Fire/Prepare-For-Wildfire-READY-SET-GO>

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Under California's emergency management structure, each county operates as an "Operational Area," giving it independent authority and responsibility for issuing alerts and warnings within its jurisdiction. Santa Clara County has been using Everbridge for several years, with trained personnel across jurisdictions, including staff from Palo Alto's OES and Police dispatch.

Everbridge is Palo Alto's primary tool for sending mass alerts in wildfire situations. There are two main response scenarios: First, if a fire breaks out within Palo Alto's jurisdiction, OES will issue an immediate alert after assessing the fire's location and direction. Second, if a fire starts outside the area but moves toward Palo Alto, they monitor and notify residents as needed. Residents can "opt in" to receive these alerts by registering at [alertscc.org](http://alertscc.org). Additionally, Everbridge includes an "all records" list, which contains duplicates, and includes data from their reverse 911, purchased cell phone records, white and yellow pages, and data from the prior system, Blackboard. However, this "all records" list contains duplicates making it difficult to determine the total number of residents signed up for the service. For example, an individual might have their information listed in all records noted above and each record lists them as a separate contact.

Based on the alert system sign-up data provided by Santa Clara County, the percentage of Palo Alto residents signed up for alerts increased from 15% in 2023 and 2024 to 17% in 2025. Participation among other Santa Clara County cities in 2025 ranges from 7% to 29%. Some cities may have more or less of their population occupying WUI areas which may account for some of the differences in emergency alert adoption.

The OCA recommends the City continue to explore ways to increase resident participation in this program since it is the City's primary communication tool for reaching residents in an emergency.

## **Resources**

The City has seven fire stations. Six fire stations are staffed full-time and the seventh station provides seasonal coverage in the foothills region during high-fire danger months. This seventh station is staffed through an interlocal agreement with Los Altos Hills and Santa Clara County which specifies a rotational schedule to ensure coverage.

Mutual aid agreements are essential in wildfire management, enabling communities to combine resources, expertise, and personnel across jurisdictions for a more effective and rapid response to large-scale fires. Wildfires spread quickly and can overwhelm local resources, making support from neighboring cities, counties, and state agencies critical for containment and suppression. These agreements establish protocols for communication, resource sharing, and logistical coordination, which helps reduce response times and enhances overall operational efficiency. FEMA and CAL FIRE emphasize that such partnerships strengthen resilience by ensuring that participating agencies are prepared to respond cohesively to the complex challenges of wildfire emergencies.

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**While the City has strong relationships with their mutual aid agreement partners, the City does not maintain these agreements in a central repository for easy tracking and monitoring**

Palo Alto has 5 mutual aid agreements for wildfire response, though some require updates for ongoing effectiveness. The Station 8 agreement remains active, providing 24/7 monitoring during wildfire season, while the Mutual Threat Zone operating plan with CAL FIRE establishes guidelines for resource usage and remains in force until a 30-day termination notice is issued. Additionally, the agreement among Palo Alto, Santa Clara County, and Los Altos Hills ensures the availability of nearby resources for emergencies, continuing unless ended by a 30-day notice. The agreement with Woodside, which expired sometime in 2019 had no specified end date, according to the Deputy Fire Chief negotiations for a new contract are currently underway. The mutual aid agreement with Mountain View is also expired, though still honored by both cities. The OCA noted that these agreements are not kept in a central repository which may make it difficult to track and monitor the status of the agreements.

**Recommendation**

We recommend the City consider the following improvements to enhance its Wildfire response efforts:

1. The City's emergency plans align with the majority of FEMA guidance; however, they would be strengthened by incorporating a more comprehensive revision history and an enhanced review process. The City should also review its evacuation plans and consider if plans could be enhanced by reviewing best practices in other cities such as establishing evacuation locations and sheltering agreements with neighboring communities.
2. City management should more formally track and monitor findings and recommendations identified during training exercises and in AARs of emergency incidents to ensure needed improvements are made and issues are timely resolved.
3. Continue to explore ways to increase resident registration in the County's emergency alerting system. Opportunities may include partnering with schools, homeowner associations, and local businesses to disseminate wildfire education materials and encourage participation in City programs and the County's emergency alert system.
4. Determine an appropriate solution for staff to more easily access, track and monitor the status of all mutual aid agreements, including active dates, renewal deadlines, and responsible contacts for updates. For example, a centralized tracking system for mutual aid agreements would provide clarity on the status of each agreement, preventing lapses in mutual aid coverage and ensuring that expired agreements are addressed promptly.

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## Management Response

Please see appendix for responses.

## Additional Observation

The OCA noted that while the Utility has a regular Capital Improvement and electric Grid Modernization Project, it does not have a formal maintenance schedule that proactively anticipates and schedules maintenance as the infrastructure ages. Instead, maintenance issues are addressed on an as needed basis. Management stated that the Utility is currently behind schedule in addressing line and pole maintenance due to resource constraints but is on schedule to complete all Overhead and Underground facility inspections for 2024.

The OCA has performed a general assessment of CPAU's line and pole maintenance program noting some areas for the City to consider. The OCA analyzed pole data from the Utility's pole inspection report<sup>7</sup> and noted that approximately half of the City's poles are over 40 years old, with some poles dating back to the 1940's. 545 of CPAU's poles are 60 years old or older and may present age-related maintenance issues. It should be noted that many of these poles may be scheduled for replacement as part of the Grid Modernization project.

In addition to the Utility's pole inspection report, the OCA asked for example inspection reports for individual pieces of equipment and poles. These reports are entered into the CPAU Electric Equipment & Maintenance Database. The audit team noted that for the example reports received, the previous inspection dates on the forms appeared to be more than 10 years ago. The OCA recommends the City consider implementing a formal infrastructure maintenance program as part of its Grid Modernization efforts to ensure ongoing timely inspection and maintenance in the future.

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<sup>7</sup> CPAU contracts with a third-party vendor to conduct compliance inspections to ensure utility poles and equipment are well maintained. Visual inspections are conducted annually and a detailed inspection every five years. Every ten years, the vendor performs an "intrusive inspection" which can include drilling into the poles to determine their condition. Lines and poles are rated using a 3-point scale from P1 (most serious and needing immediate attention) to P3 (less urgent). Staff stated that poles rated with a P1 are remediated immediately, however, the OCA could not assess the timeliness of response based on the reports provided.

## Appendix A: Management Response Matrix

Finding 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.				
Key Recommendation	Concurrence	Responsible Department(s)	Action Plan	Target Date (calendar year)
1. Continue efforts to underground WUI distribution infrastructure and prioritize as appropriate maintenance and possible replacement of the oldest poles should they remain in place.	Agree	Utilities	<p>Staff appreciates the CAO's validation of this priority and agree that efforts should continue to underground and harden distribution infrastructure within the high fire danger area. The City's Utilities Wildfire Mitigation Plan, updated and approved annually, prioritizes the undergrounding of the City's overhead infrastructure in the high fire danger area on Arastradero Road. The first phase of the Foothill Fire Mitigation Project will move powerlines underground and remove approximately 182 of the total of 203 power poles and overhead powerlines in the high-risk area. The estimated 21 remaining poles and associated equipment require additional engineering and coordination prior to additional fire hardening measures.</p> <p>The Foothill Fire Mitigation Project includes substructure construction, including the installation of boxes and pad-mounted equipment; Cable pulling and line energization; Decommissioning of overhead poles and equipment.</p>	Q4 2025
2. Line Clearance policy documents should be established and or reviewed, updated, and finalized (e.g. Draft Tree and Landscape Technical Manual)	Agree	Public Works	Staff is actively working to update the Draft Tree Landscape Technical Manual (TLTM), and the recent the public comment period on the proposed revisions closed March 2025. Comments are under review and a draft of the TLTM is scheduled for review with the Parks and Recreation Commission, with a final version expected this year. Staff agree and plan to establish a line clearing policy for trees and landscape (like the current line clearing policy for utilities operations).	Q4 2025
3. Continue efforts to better track and monitor property violations in the WUI to enhance enforcement	Agree	Fire	The fire prevention bureau started utilizing Streamline software in 2024 and at the time of this report has now fully implemented this tool. This software, specifically designed for fire inspections, will improve inspection management, including tracking and monitoring of properties with violations that require re-inspections.	Q1 2025
4. Prioritize efforts to establish a Firewise Community including stakeholder engagement throughout the process	Agree	OES, Fire	The Palo Alto Fire Department (PAFD) is working towards a long-term contract with the Fire Safe Council including cost estimates for roadside clearance and public education resources, i.e. Firewise Community. PAFD is seeking partnership with Woodside Fire Protection District and Los Altos Hills Fire District to enhance our presence and efforts towards public education and will support residents in the pursuit of participation in the Firewise Communities program. Firewise is a grassroots program	Q4 2025

**Finding 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.**

Key Recommendation	Concurrence	Responsible Department(s)	Action Plan	Target Date (calendar year)
			that the impacted Community must initiate. As stated in the CWPP, staff will work with local Foothills community to attain and maintain Firewise USA recognition	
5. Formalize the contract with CAL FIRE to ensure service provision continues into the future.	Partially Agree	Fire	Staff agree that multiyear formal contracts would be a best practice and understand that operationally this may not be feasible since it would add administration obligations for an outside agency. The summer of 2025 will be the third year that CAL FIRE assists the City of Palo Alto with hazardous fuel removal. CAL FIRE provides similar services for multiple agencies in the county (San Jose, Morgan Hill) without a contract. Staff will seek this formalization to ensure stability and continuity, though it may be infeasible if CAL FIRE does not agree to a formal contract. CAL FIRE does not charge cities for the provision of these services.	Q4 2025
6. Ensure wildfire education and outreach plans document coordination efforts between Office of Emergency Services (OES), Fire and CPAU to ensure information is consistently and regularly provided to residents.	Partially Agree	OES, Fire, Utilities, CMO	<p>Staff partially agree as this work is already being coordinated among departments. Staff will look to update the City's existing plans and hazard-specific annex documents ensuring communication of information is consistent and timely, reflecting the practices in place.</p> <p>The existing EOP identifies communication protocols and responsibilities in the event of a disaster but could add details to formalize wildfire preparedness and outreach. The leadership team reviews all scheduled community events and engagement points on a monthly basis, including educational events for seasonal events such as floods and wildfires.</p> <p>A unified wildfire preparedness effort among departments to build community awareness, offering tools and tips, and sharing online resources already includes the following: annual door hangers, utility bill inserts, general emergency services communications such as continued promotion of AlertSCC, the City's emergency alert system, annual test of Alert SCC, and annual community presentations on wildfire preparedness all available on the "Ready, Set, Go!" web resource referenced in the report. Annually, OES and PAFD host public education forums for residents and businesses in the WUI.</p>	Q2 2026

**Finding 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.**

<b>Key Recommendation</b>	<b>Concurrence</b>	<b>Responsible Department(s)</b>	<b>Action Plan</b>	<b>Target Date (calendar year)</b>
1. The emergency plans align with the majority of FEMA guidance; however, they would be strengthened by incorporating a more comprehensive revision history and an enhanced review process. The City should also review its evacuation plans and consider if plans could be enhanced by reviewing best practices in other cities such as establishing evacuation locations and sheltering agreements with neighboring communities.	Agree	OES, Fire	<p>OES will institute management controls to ensure scheduled reviews of the City's published emergency plans are timely completed with revision histories clearly documented, beginning with the current update of the EOP underway.</p> <p>The City has evacuation maps available on the OES website and all public education materials and sessions advise residents of the location and content of the resources. PAFD and OES continue to utilize Genasys (formally Zonehaven) software that notifies residents in a particular zone of evacuation warnings and orders related to natural and human caused disasters: what is happening, where to evacuate, etc. which also includes pre-approved messaging in the platform.</p>	Q4 2025
2. City management should more formally track and monitor findings and recommendations identified during training exercises and in emergency incident AAR recommendations to ensure needed improvements are made and issues are timely resolved	Agree	OES	<p>Staff review AARs from training/tabletop exercises and real-world incidents, though the outcomes of these are tracked differently depending on the nature of the incident or training. For tabletop exercises, OES regularly conducts citywide AARs for training exercises and incidents. OES reviews and follows-up on necessary improvements identified in the AARs, however, to instill further rigor, OES will implement a post-AAR process review every six months until resolution of identified action items for final closure.</p> <p>PAFD routinely conducts AARs following major incidents, which are then reviewed by executive command staff. Depending on any identified areas for improvement, such as further training or policy updates, the Deputy Chief over operations is responsible for ensuring completion of applicable follow-up steps including additional feedback to departments outside of the Fire Department.</p>	Q3 2025
3. Continue to explore ways to increase resident registration in the County's emergency alerting system (AlertSCC). Opportunities may include	Agree	CMO, Utilities, OES, Fire	The City uses many forms of communication to ensure community engagement, notification, and education activities and to increase AlertSCC sign ups. This is prominent on many pages of the City's website, a recurring item in digital newsletters and printed outreach and always included in City emergency preparedness education programs	Q1 2025

**Finding 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.**

Key Recommendation	Concurrence	Responsible Department(s)	Action Plan	Target Date (calendar year)
<p>partnering with schools, homeowner associations, and local businesses to disseminate wildfire education materials and encourage participation in City programs and the County's emergency alert system.</p>			<p>regardless of the type of disaster being highlighted. It isa central message provided at community events through tabling. An annual AlertSCC test is scheduled citywide to encourage more registrations.</p> <p>Staff agree that continuing to support participation in this program is important, and will continue to promote AlertSCC registrations in various City engagement efforts. Note that the City continues to be ahead when compared to the Countywide 10% opt-in level. Last year, as a result of communications efforts, over 7,000 City contacts opted into receive emergency alerts. Furthermore, staff agree and will continue to partner with schools, Palo Alto Neighborhoods, and local businesses to share educational materials.</p>	
<p>4. Determine an appropriate solution for staff to more easily access, track and monitor the status of all mutual aid agreements, including active dates, renewal deadlines, and responsible contacts for updates. For example, a centralized tracking system for mutual aid agreements would provide clarity on the status of each agreement, preventing lapses in mutual aid coverage and ensuring that expired agreements are addressed promptly.</p>	<p>Partially Agree</p>	<p>OES, Fire</p>	<p>The City's EOP includes a section on mutual aid within the framework of the CA Master Mutual Aid Agreement. This includes a list of mutual aid response disciplines, coordinating agencies, and specific elements included, e.g. fire &amp; rescue, search and rescue, emergency management, etc.</p> <p>Although current mutual aid agreements for fire services are retained by the Fire Department in current operations, staff agree that a central repository of auto-aid agreements will be kept with emergency protocol documentation as an appendix/reference document, for broader and more ready accessibility in an emergency. A tracking system is not needed as all auto aid agreements within Santa Clara County agencies are current and have no expiration dates. Locally, the Santa Clara County XSC Mutual Aid Plan is reviewed and updated annually.</p> <p>San Mateo County fire chiefs are looking at the details of the mutual aid agreements in the County to review operational impacts countywide. The auto aid agreements with Woodside Fire Protection District and Menlo Park Fire, both of which are in San Mateo County, do have end dates and are currently for freeway responses only.</p>	<p>Q3 2025</p>