CITY OF PALO ALTO
WILDFIRE MITIGATION PLAN
2021 INFORMATIONAL RESPONSE

RESPONSES TO WILDFIRE SAFETY ADVISORY BOARD'S 2021 GUIDANCE ADVISORY OPINION

July 1st, 2021

I. PURPOSE OF THIS 2021 INFORMATIONAL RESPONSE

The California Wildfire Safety Advisory Board (WSAB) issued the *Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Cooperatives* ("2021 WSAB Guidance Advisory Opinion") on December 15, 2020. City of Palo Alto provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. POUs will provide a narrative response and/or a cross reference to the location in City of Palo Alto's Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to City of Palo Alto, the response will provide a brief description supporting this conclusion.

II. CONTEXT SETTING INFORMATION

WSAB requested that POUs provide an informational table to assist the Staff and Board member in understanding the unique characteristics of each POU.

Table 1: Context-Setting Information

Utility Name	**[POU]**	
Service Territory Size	[*26*] square miles	
Owned Assets	☐ Transmission ☒ Distribution ☐ Generation	
Number of Customers Served	[*29,791*] customer accounts	
Population Within Service Territory	[*65,000*] people	
Customer Class Makeup	*Number of Accounts*	*Share of Total Load (MWh)*
	[*13*]% *Residential;* [__]% Government; [__]% Agricultural; [*87*]% *Small/Medium Business; Commercial/Industrial*	[*20*]% *Residential;* [__]% Government; [__]% Agricultural; [*80*]% *Small/Medium Business; Commercial/Industrial*
Service Territory Location/Topography[1]	[__]% Agriculture [__]% Barren/Other [__]% Conifer Forest [__]% Conifer Woodland [__]% Desert [__]% Hardwood Forest [__]% Hardwood Woodland	*(See Attachment A, Pg 1 – 2)*

[1] This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) *available at*: https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3.

	[__]% Herbaceous [__]% Shrub [__]% Urban [__]% Water
Service Territory Wildland Urban Interface[2] (based on total area)	[__]% Wildland Urban Interface; *(This data was unable to be determined. See attachment B for wildland urban interface map)* [__]% Wildland Urban Intermix;
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	☒Includes maps *(See Appendix C in City of Palo Alto Fire Mitigation plan)* Tier 2: [_40] % *(Approximation based on visual interpretation of map.)* Tier 3: [_0_]%
Prevailing Wind Directions & Speeds by Season	☐ Includes maps *City of Palo Alto is unable to provide specific wind information for this response. The summary below is from Cal Fire - Santa Clara Unit – 2020 Strategic Fire Plan:* *The large population centers of Palo Alto, Cupertino, Los Gatos and Saratoga are all within the Local Responsibility Areas (LRA) but are treated as Mutual Threat Zones (MTZ). Weather in Battalion 3 is typical of a Mediterranean climate. Fog often intrudes during the evening hours and burns off late the next morning. Onshore breezes from the Pacific raise humidity and moderate fire danger most summer afternoons. Evening inversions that set up above the fog layer create extremely low humidity levels overnight and create humidity readings that can be as much as 30% lower 500 ft. above the fog. Offshore flow, coupled with low 100 and 1000-hour fuel moisture levels in late summer fall and even in the winter months create critical fire weather conditions. The historic large fires in this battalion have occurred under the influence of strong north winds which bring the entire Santa Cruz Mountain range into a critical wind alignment when they surface. The East Slope of the Santa Cruz Mountains receives on average 25 inches of rain per year. Strong moist Pacific storms come off the ocean and create orographic lift on the mountain range producing significant rainfall.*
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: [*209*] *miles* Overhead Trans.: [*12*] *miles (60kV sub-transmission)* Underground Dist.: [*273*] *miles* Underground Trans.: [*7*] *miles (60kV sub-transmission)*
	Explanatory Note 1 - Methodology for Measuring "Miles"*:* [e.g., circuit miles, line miles.] *Circuit miles*
	Explanatory Note 2 – Description of Unique Ownership Circumstances: *Majority of poles are jointly owned with AT&T*
	Explanatory Note 3 – Additional Relevant Context*:* [e.g., percentage of lines located outside service territory] *Zero percent of lines are located outside of City of Palo Alto.*
Percent of Owned Lines in	

[2] This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, *available at* https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

CPUC High Fire Threat Districts	Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)
	Tier 2: [*5.3*]% Tier 3: [*0*]%
	Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)
	Tier 2: [*0*]% Tier 3: [*0*]%
	Explanatory Note 4 – Additional Relevant Context: [e.g., explain any difference from data reported in WMP due to different numerator used for this form]
Customers have ever lost service due to an IOU PSPS event?	☐ Yes ☒ No
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	☒ Yes ☐ No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☒ Yes ☐ No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	☐ Yes ☒ No If yes, then provide the following data for calendar year 2020: *Number of shut-off events*: [____] *Customer Accounts that lost service for >10 minutes:* [____] *For prior response, average duration before service restored:* [____]

III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

WSAB requested that POUs provide a clear roadmap as to where each statutory requirement is addressed within the POU WMP.

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	**PUC § 8387(b)(2)(A):** An accounting of the **responsibilities of persons** responsible for executing the plan.	Section [*Roles and Responsibilities – City of Palo*

		Alto Departments] Page [*7-9*]
Objectives of the Plan	**PUC § 8387(b)(2)(B):** The **objectives** of the wildfire mitigation plan.	Section [*Objectives*] Page: [*5*]
Preventive Strategies	**PUC § 8387(b)(2)(C):** A description of the **preventive strategies and programs to be adopted by the local publicly owned electric utility** or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Section [*Ongoing Fire Prevention Activities*] Page [*11-15*] *and* Section [*Proposed Activities to Reduce Risk or Improve Response*] Page [*15-18*]
Evaluation Metrics	**PUC § 8387(b)(2)(D):** A description of the **metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan's performance** and the assumptions that underlie the use of those metrics.	Section [*Mitigation Plan Review and Assessment Process*] Page [*21*]
Impact of Metrics	**PUC § 8387(b)(2)(E):** A discussion of how the **application of previously identified metrics** to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section [*Mitigation Plan Review and Assessment Process*] Page [*21-22*]
Deenergization Protocols	**PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system** that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Section [*Ongoing Prevention Activities*] Page [*13-15*]
Customer Notification Procedures	**PUC § 8387(b)(2)(G):** Appropriate and feasible **procedures for notifying a customer** who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section [*Ongoing Fire Prevention Activities*] Page [*13-15] and*

		Section [*Community Outreach*] Page [*20*]
Vegetation Management	**PUC § 8387(b)(2)(H):** Plans for vegetation management.	Section [*Ongoing Fire Prevention Activities*] Page [*11]*
Inspections	**PUC § 8387(b)(2)(I): Plans for inspections** of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section [*Ongoing Fire Prevention Activities*] Page [*12]*
Prioritization of Wildfire Risks	**PUC § 8387(b)(2)(J):** A list that **identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory**. The list shall include, but not be limited to, both of the following: **(i)** Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities. **(ii)** Particular risks and **risk drivers** associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	Section [*Wildfire Risk Factors*] Page [*3-4*]
CPUC Fire Threat Map Adjustments	**PUC § 8387(b)(2)(K):** Identification of any **geographic area in the local publicly owned electric utility's or electrical cooperative's service territory** that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.	*No adjustments made to original fire threat map shown in Appendix C*
Enterprisewide Risks	**PUC § 8387(b)(2)(L):** A methodology for identifying and presenting **enterprisewide** safety risk and wildfire-related risk.	Section [*Wildfire Risk Factors*] Page [*3*]
Restoration of Service	**PUC § 8387(b)(2)(M):** A statement of how the local publicly owned electric utility or electrical cooperative will **restore service after a wildfire**.	Section [*Response to Wildfire Incident*] Page [*18-20*]

Monitor and Audit	**PUC § 8387(b)(2)(N):** A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) **Monitor and audit** the implementation of the wildfire mitigation plan. (ii) **Identify any deficiencies** in the wildfire mitigation plan or its implementation, and correct those deficiencies. (iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.	Section [*Mitigation Plan Review and Assessment Process*] Page[*21-22*]
Qualified Independent Evaluator	**PUC § 8387(c):** The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.	Section [*Auditing*] Page [*22*]

IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POUs are requested to address in their 2021 WMPs. As specified in Public Utilities Code § 8387(b)(1), each POU is required to perform a comprehensive revision to the POU's WMP at least once every three years. Pursuant to this guidance, the POUs will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB's recommendations have been provided after the initial WMP submission, the POUs will have varying capacities to fully address each recommendation in their 2021 WMP. This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross refence to where in the POU's WMP this topic is addressed; (3) describe why the recommendation is not applicable to the POU; or (4) inform the WSAB of the POU's intent to address the recommendation at the point of the POU's next comprehensive revision, occurring in either the 2022 or 2023 WMP.

A. Plan Structure

WSAB Recommendation #1: Provide context-setting information about the POU and provide a simple guide to where the statutory requirements are addressed within the WMP.

POU Response: *See Sections II and III above.*

WSAB Recommendation #2: Provide a short description of the POU's public review and approval (if required) for the WMP. This description may also include a brief explanation of the funding mechanisms for wildfire mitigation efforts.

POU Response: *The City of Palo Alto's WMP was initially presented to the Utilities Advisory Committee (UAC) and City Council for public comment in 2019 and approved in January 2020. The UAC is a Brown Act body, comprised of City Council-appointed members of the community. These residents meet monthly to provide advice to our City Council on acquisition and development of electric, gas and water resources; joint action projects with other public or private entities which involve electric, gas or water resources; environmental implications of electric, gas or water utility projects, conservation and demand management.*

Broadly speaking, the UAC meetings create an intentionally redundant, local regulatory process that allows us to ensure that our operations and efforts receive transparent scrutiny from two different bodies. Both the UAC and our City Council received presentations of our WMP, through noticed, public meetings. By presenting our WMP to two oversight bodies, staff was able to receive direct, meaningful feedback from knowledgeable, interested community members, commissioners, and our local elected officials.

Per PUC Section 8387, the City of Palo Alto's WMP was again reviewed and updated by staff and presented to the UAC in a public meeting on June 2nd, 2021. Funding for the utilities wildfire mitigation efforts are in the Capital Improvement Plan and Electric Utility's operation budget, which is reviewed and approved each year by City Council through an annual budget approval process.

WSAB Recommendation #3: Identify where the POU has posted the most recent Independent Evaluator (IE) Report and if your POU plans to enhance future IE reports, please summarize in what ways.

POU Response: *The Independent Evaluator Report (IE) is posted on the City's webpage at the link below and will be updated with future IE reports as required:*

https://www.cityofpaloalto.org/files/assets/public/utilities/id-10670-attachment-e.pdf

WSAB Recommendation #4: Develop, in collaboration with POU industry associations, WMP guidelines for future WMPs, understanding that it may take multiple cycles for POUs to integrate these recommendations into the WMPs.

POU Response: *This document is intended to include, as appropriate, responses to the recommendations in the WSAB's Guidance Advisory Opinion for the POUs' 2021 WMP. This document also represents the combined effort of the POU industry associations to further the development of a template to respond to the WSAB's Guidance Advisory Opinion in a future reporting WMP cycle.*

B. Customer Impacts

WSAB Recommendation #5: Describe the potential impact investor-owned utilities (IOU) public safety power shutoff (PSPS) events could have on POU customers and how the POU manages these impacts. For POUs that are also balancing authorities, describe the criteria for wildfire related de-energizations. Responses shall only provide aggregated information that does not provide customer-specific information or other potentially sensitive data.

POU Response: *Though it is possible for City of Palo Alto's customers to be impacted by a PG&E public safety power shutoff (PSPS) event, the geographical location of Palo Alto's interconnection facilities with PG&E are in an urban area. Should an event occur where Palo Alto customers would be impacted by a PG&E PSPS event, there are procedures in place to notify all residents and other customers.*

Despite the unlikely event of a PG&E PSPS in our City, such an event could result in a power outage for our customers. We proactively manage these impacts by maintaining a collaborative relationship with PG&E staff, understanding how to communicate with PG&E during a PSPS event, and implementing a customer communication plan already in place.

WSAB Recommendation #6: Describe the utility customer communication plans with respect to wildfires and PSPS, and in particular describe the methods, content and timing used to communicate with the most vulnerable customers, such as Access and Functional Needs (AFN) customers, medical baseline customers, non-English speakers, and those at risk of losing water or telecommunications service.

POU Response:

The City of Palo Alto has established a policy for a Public Safety Power Shutoff (PSPS) which defines the conditions for a PSPS and establishes general procedures for both internal and public communications. The City has identified the Palo Alto Foothills as an area of high threat and elevated risk for wildfire. The City of Palo Alto Utilities (CPAU) Electric Operations Dispatch are responsible for monitoring weather conditions and Red Flag Warnings issued by the National Weather Service for the Santa Cruz Mountains to determine if a PSPS may be required. This is in coordination with the City's Fire Department, Office of Emergency Services, and Public Works Urban Forestry division. In the event that a PSPS is being monitored, or is anticipated to occur, the City will activate its communications plan. Customers are notified of potential PSPS events through a combination of these communication channels:

a. *Outage Management System*
b. *Utility bill inserts*
c. *Direct mail letters/fliers to Foothills customers*
d. *Email notifications*
e. *Phone calls from Customer Service*
f. *Updated messaging via the Customer Service Call Center automated recordings*
g. *Social media channels, including Nextdoor*
h. *City and CPAU webpage notifications, including news details and emergency banner notifications*
i. *Office of Emergency and Public Safety notification channels, including AlertSCC and Nixle*
j. *Communications staff notifications to neighborhood groups, Key Account customers, and internal staff*
k. *Coordination with the Office of Emergency Services (OES), Public Safety Departments, Emergency Services Volunteers and Neighborhood Block Coordinators to reach all customers including those with Access and Functional Needs (AFN), medical baseline requirements, non-English speakers, and those at risk of losing water or telecommunications service.*
l. *Staff and management notifications to City Council and Utilities Advisory Commission*

C. The Grid

WSAB Recommendation #7: Provide details on each POU's system hardening and grid design programs, including: (1) the goals of the programs and the risk any particular program is designed to mitigate; (2) approach to PSPS mitigation and prevention; and (3) identify any resource shortages.

> ***POU Response:*** *City of Palo Alto's approach to system hardening and grid design is discussed in Section [Objectives – Page 5] and Section [Proposed Activities to Reduce Risk or Improve Response – Page 15-16] of City of Palo Alto's WMP. The goals are to reduce wildfire risks due to the electrical facilities in the area and mitigate or prevent future incidents.*
>
> *Regarding resource shortages, current staffing shortages in the Electric Utility our Utilities Department's engineering and operations groups pose the largest challenge to accomplishing the tasks provided in City of Palo Alto's WMP. This issue has been raised and acknowledged by department heads, the City Manager, and the City Council with several options under review.*

WSAB Recommendation #8: Describe annual visual patrols on potentially impacted circuits and the risks the POU is inspecting for. Describe whether and how system inspections lead to system improvements. Describe line patrols before, during, and/or after a critical fire weather event, such as a Red Flag Warning with strong winds, or following a fire that burned in areas where electric facilities are or could have been impacted.

> ***POU Response:*** *City of Palo Alto has one circuit of approximately 11 miles that runs through the area west of Highway 280 rated as a high fire threat area, Tier 2 – Elevated Risk. Several City departments (Utilities, Urban Forestry, Open Space, Fire, Office of Emergency Services (OES) coordinate to accomplish the activities listed in the WMP before, during, and after critical fire weather events, including visual patrols and inspections of electrical facilities. See the following sections in City of Palo Alto's WMP:*
>
> > *Section: Ongoing Fire Prevention Activities - Pages 11 - 14*
> > *Section: Proposed Activities to Reduce Risk or Improve Response- Pages 15 - 18*
> > *Section: Response to Wildfire Incident - Pages 18 - 20*
>
> *Tags or work orders are created with the respective departments for maintenance, repairs, or compliance.*

WSAB Recommendation #9: Describe options considered by POU (including through the joint efforts of the POU associations) to identify previously unidentified risks that could lead to catastrophic wildfires.

> ***POU Response:*** *The California Municipal Utilities Association (CMUA) will be holding a special meeting of its Wildfire Preparedness, Response, and Recovery Working Group this fall, which will be focused on risk drivers for power-line caused catastrophic wildfires and innovative mitigation options. CMUA plans to invite a broad range of utility staff, state agency staff (including the WSAB), industry experts, and academics to participate in this discussion. As part of this meeting, the working group will discuss unidentified wildfire risk drivers and mitigation measures that could address these risks. Based on the input provided during this meeting, CMUA will produce a publicly-available, post-meeting report that summarizes the group's conclusions and recommendations. [POU]'s staff will participate in CMUA's meeting and will discuss any changes that [POU] has made to its operations in response to the conclusions and recommendations of the working group in a future WMP.*

D. Risk Assessment

WSAB Recommendation #10: Describe the particular wildfire risks associated with system design and construction such as topography and location near the HFTD areas of another utility's service territory. Describe any G.O. 95 exempt assets and possible updates to G.O. 95 that could facilitate more resilient utility transmission and distribution assets.

> ***POU Response:*** *City of Palo Alto's assessment of wildfire risks is discussed in Section [Wildfire Risk Factors] of City of Palo Alto's WMP. To our knowledge, there are no enhanced risks associated with system design or construction of PG&E electrical facilities in the HFTD areas of Palo Alto.*

E. SITUATIONAL AWARENESS TECHNOLOGY

WSAB Recommendation #11: Provide context-setting information about the prevailing wind directions and speeds, differentiated by season, along with average weather conditions by season. Describe how and why situational awareness technology is installed, and where on the system. Describe the decision-making process regarding the installation of situational awareness technology, including constraints such as budgets, availability of equipment,

knowledge to effectively deploy, or qualified personnel to install and monitor effectively. Identify any other agencies, utilities, or fire professionals that the data from these devices is shared with.

> ***POU Response:*** *City of Palo Alto is currently in the process of installing a new weather station at the Montebello water pump station in the foothills area of Palo Alto. The new weather station will provide City staff with live, local weather information in the foothills of Palo Alto including temperature, wind speed, wind direction, and humidity. The data will be available to several city departments to supplement other sources of weather information available online that sometimes may not be specific to the foothills area of Palo Alto. This provides the incident coordinator or department heads with additional data to make decisions regarding deenergization.*

F. VEGETATION MANAGEMENT

WSAB Recommendation #12: Describe treatment plans for all types of vegetation associated with utility infrastructure, from the ground to the sky, which includes vegetation above and below electrical lines.

> ***POU Response:*** *City of Palo Alto's vegetation management program is discussed in two sections of our WMP: [Ongoing Activities – Page 11] and [Proposed Activities to Reduce Risk or Improve Response – Page 16-17] Overhead electric line inspections and line clearing activities in the High Fire Threat Area are coordinated between our Utilities Department, our City's Fire Department, Our City's Urban Forestry and Open Space Divisions in the Public Works Department, an our City's OES Department, , as required, to ensure all needs are met, including vegetation management.*
>
> *Through the efforts of the Urban Forestry division, vegetation management efforts are done by mechanical treatment only for all species. Urban Forestry will use specific knowledge of growing conditions and tree species to determine the appropriate clearance distance. Urban Forestry will also clear ground vegetation around the base of a pole to minimize the chance of fires.*
>
> *Within the High Fire Threat Area, Urban Forestry performs an evaluation of every tree that has the potential to have branches strike, or the entire tree fall into, the overhead facilities. The City exceeds the minimum clearance requirements as required by GO 95 Rule 35 by an additional 8 feet of radial clearance from any vegetation. Urban Forestry performs more frequent and detailed inspections of these trees, and in severe cases will work with the land owner to remove the tree.*

WSAB Recommendation #13: List the qualifications of any experts relied upon, such as scientific experts in ecology, fire ecology, fire behavior, geology, and meteorology. Specify the level of expertise of the POU staff that manages the contractors performing vegetation management. Describe measures each POU takes to ensure that POU staff and contractors comply with or verify compliance with Cal/OSHA standards on Minimum Approach Distances (MAD).

> ***POU Response:*** *The wildfire mitigation tasks and activities at the City of Palo Alto are coordinated by the internal staff who are trained, certified, and fully qualified from the Utilities, Fire, Urban Forestry, Open Space, and OES departments/divisions. The City's Urban Forestry division is led by experienced staff members, some of which are certified arborists, TRAQ – Tree Risk Assessment Qualified, Utility Specialist Certified, certified for electric line clearing, Agriculture Pest Control Advisor, and Qualified Applicator certifications.*
>
> *To ensure safety City of Palo Alto requires that our contractors are and staff are certified for electric line clearing work. This includes MAD compliance. We also employ inspectors that monitor our electrical crews for compliance.*

WSAB Recommendation #14: Describe whether the POU has considered innovative and alternative approaches to vegetation management.

> ***POU Response:*** *City of Palo Alto staff are exploring new GIS software to map and analyze canopy cover and its proximity to electrical facilities using lidar technology.*

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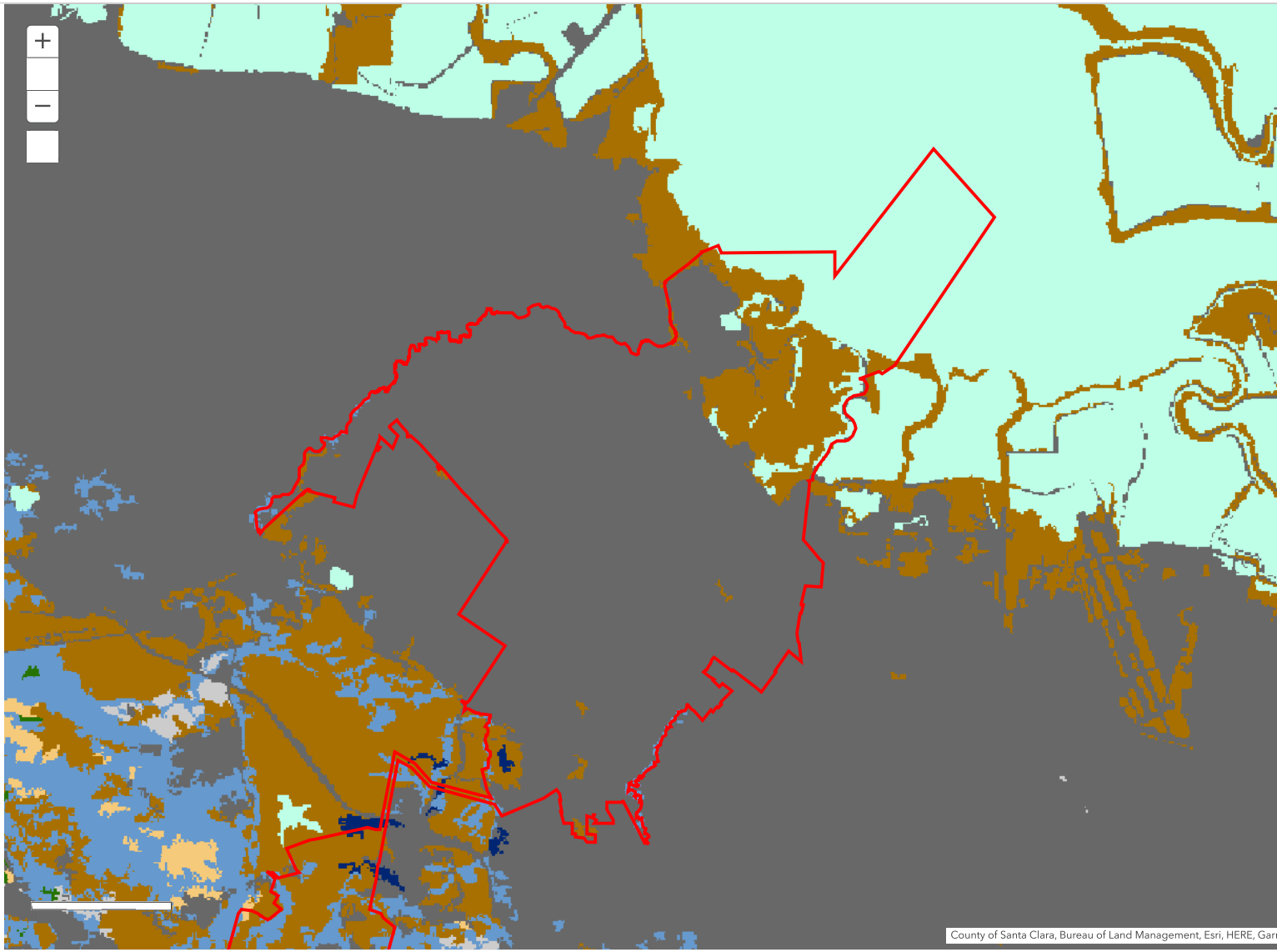
Legend

CityofPaloAltoBoundary - CPAU_BASE.PL_CITY

California Vegetation - WHR13 Types

Vegetation

- Agriculture
- Barren/Other
- Conifer Forest
- Conifer Woodland
- Desert
- Hardwood Forest
- Hardwood Woodland
- Herbaceous
- Shrub
- Urban
- Water



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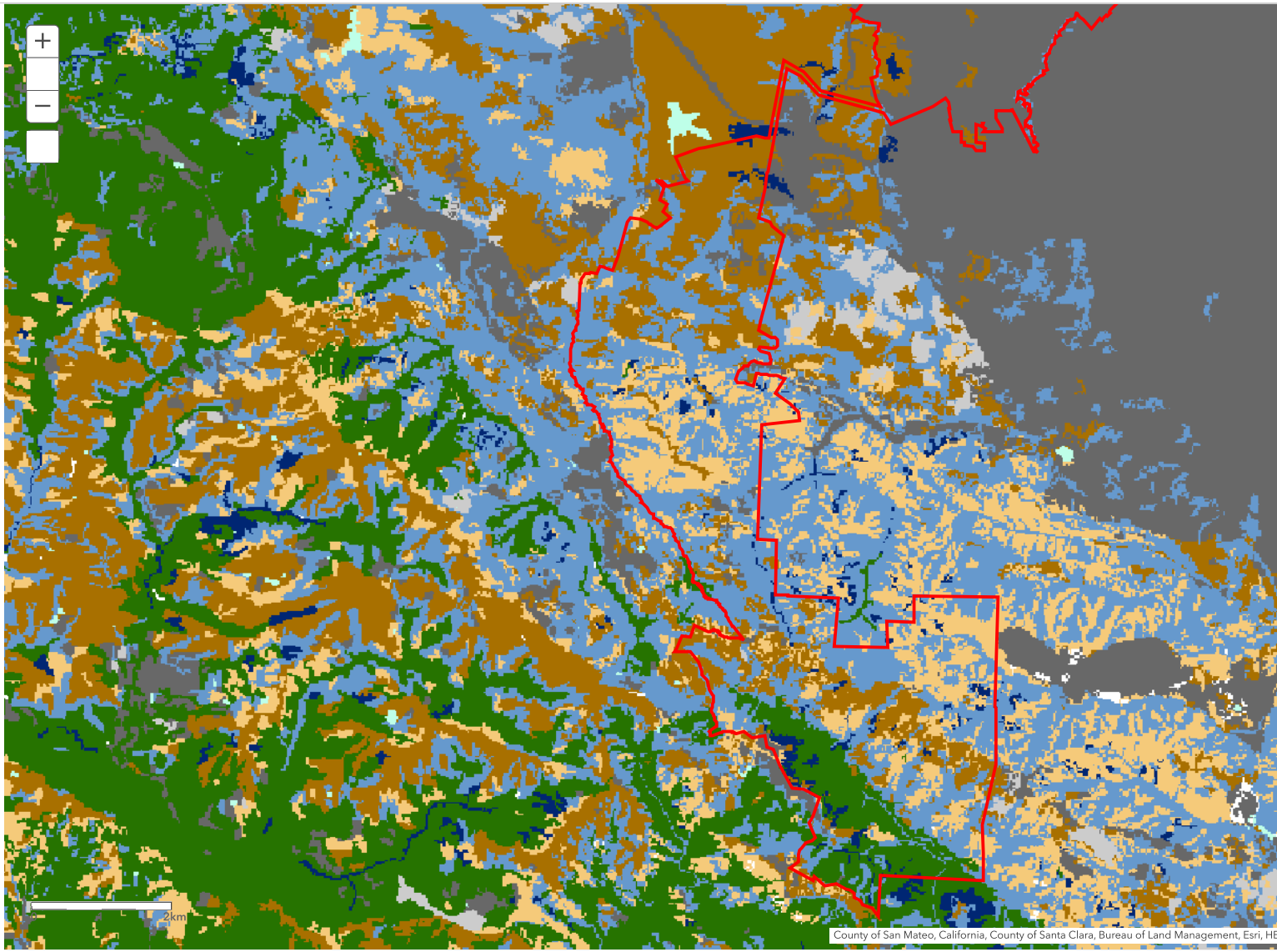

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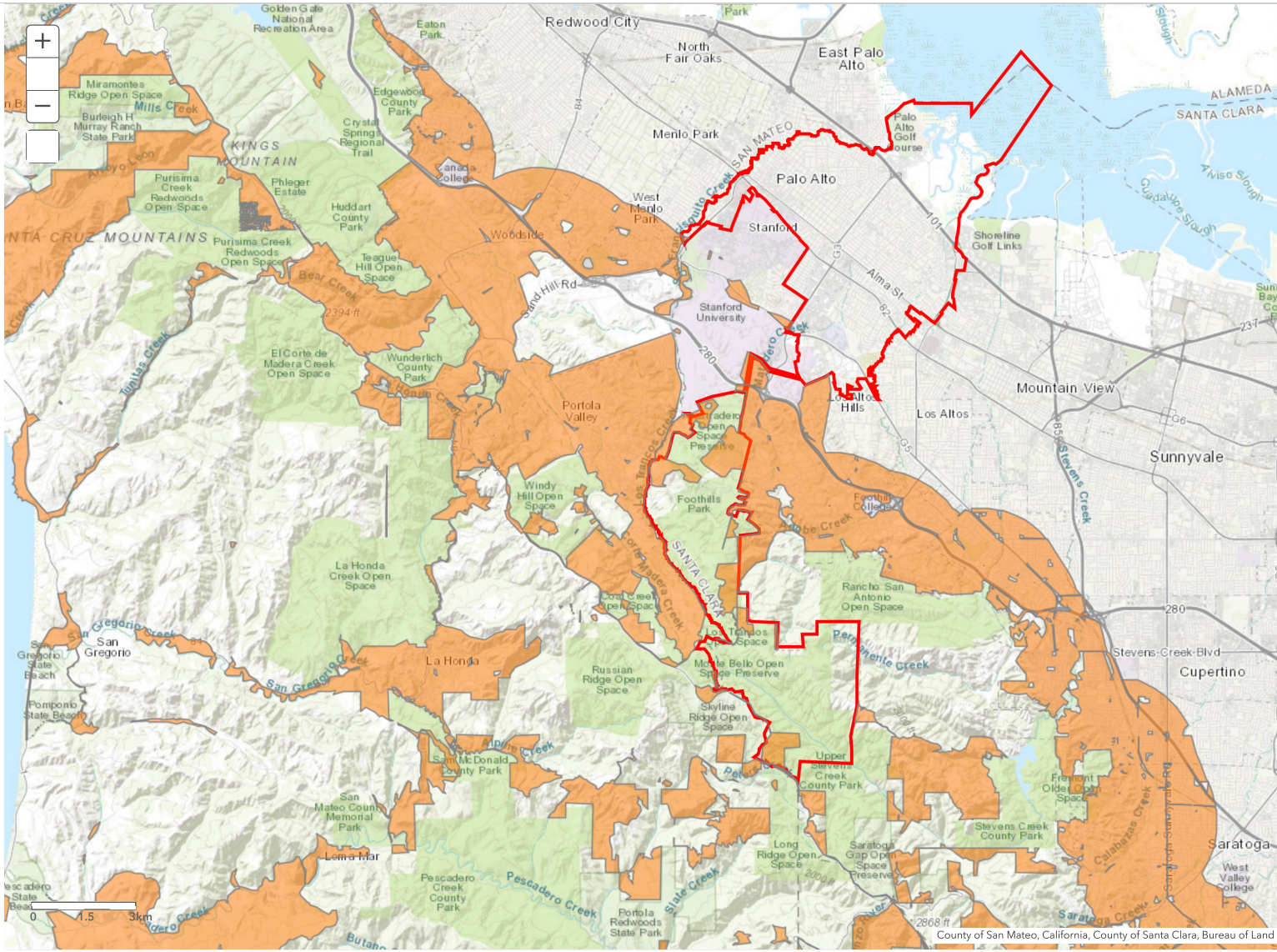
Wildland_Urban_Interface_vector - Wildland Urban Interface in CA

CityofPaloAltoBoundary - CPAU_BASE.PL_CITY



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Attachment B - Wildland Urban Interface