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Subject: Independent Evaluator's Report of the City of Palo Alto Utilities Department 2023 Wildfire Mitigation Plan

1 Introduction

The City of Palo Alto Utilities Department (CPAU) contracted with Dudek to engage in an independent evaluation of its 2023 Wildfire Mitigation Plan (WMP). This independent evaluation report (Report) describes the technical review and evaluation of the WMP prepared by the CPAU. The WMP requirements are codified in California Public Utilities Code (PUC) §8387(b)(2) for publicly owned electric utilities (POUs). PUC §8387(c) requires that an independent evaluator review and assess the comprehensiveness of a POU's WMP and issue a summary report. Two thousand twenty-three is a particularly important year for publicly owned utilities since they are required by PUC §8387(b)(1) to *"At least once every three years, the submission shall be a comprehensive revision of the plan."*

Dudek conducted a review of CPAU's 2023 WMP from December 6, 2023, to March 20, 2023. The focus of the evaluation was to determine the comprehensiveness of the City of Palo Alto Public Utilities Department's WMP and ensure that the WMP included all elements required under PUC §8387(b)(2) (listed in Attachment A).

In addition to evaluating the elements required by the California Public Utility Code, Dudek reviewed the Wildfire Safety Advisory Board's (WSAB) specific guidance for the City of Palo Alto Public Utilities Department published in their *Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electrical Cooperatives.* ((Wildfire Safety Advisory Board, 2022)).

This Independent Evaluator's report contains the following elements: 1.) An overview of the City of Palo Alto Utilities Department, 2.) A review of the statutory requirements in PUC §8387(b)(2) for publicly owned electric utilities, 3.) A review of the specific recommendations published by the WSAB for the CPAU 2022 WMP, 4.) the 2022 wildfire mitigation and prevention accomplishments of the CPAU, 5.) An overview of the metrics used in the CPAU's WMP, and 6.) A comparison of wildfire risk reduction strategies used by the CPAU to similar utilities and municipal utility industry standards.

2 An Overview of the City of Palo Alto Public Utilities Department

The City of Palo Alto Utilities Department service territory covers 26 square miles within the Palo Alto city limits in the southeastern section of the San Francisco Peninsula. While the city limits stretch from the San Francisco Bay to the ridgelines of the Santa Cruz Mountains, the CPAU services territory is concentrated in urban areas in the northeast section of the city. The city is bordered by the northeast facing foothills and mountains to the west and southwest, to the north and south is the densely urban areas of the San Jose valley and San Francisco Peninsula, and to the east is the San Francisco Bay. The CPAU serves approximately 30,000 customers within the City of Palo Alto, primarily residential and small/medium business customers. The CPAU's service territory can be divided into two categories; the fully developed, urban area east of Interstate 280 (I-280) and the more sparsely developed areas in the Santa Cruz Mountains to the west of I-280. Most of the wildland urban interface in the CPAU's territory lies within the section south and east of I-280 (Carlson, 2022). Development in this section is sparse and while it accounts for a large portion of the city's surface area it only contains a small percentage of the CPAU's customers. Approximately 40% of their service territory lies within a tier 2 fire threat district, none of the CPAU service territory is classified as tier 3 (California Public Utilities Commission, 2018). The CPAU owns and operates transmission and distribution assets with approximately 57% of their electrical lines located underground. The CPAU does not generate its own electrical power and is reliant of power purchased on the market and delivered over PG&E lines.

The CPAU's service territory experiences a typical fire season that lasts from May to September with the area fire danger moderated by morning fog and overcast skies throughout the summer months. The Bay area typically experiences diurnal winds with onshore winds during the daytime that diminish after sunset. These on-shore winds are typically cooler and moister than the on-shore air and helps to moderate the fire danger during the fire season. As a result, large destructive wildfires are uncommon and there is one recorded instance of a large wildfire occurring within 5 miles of CPAU's service territory (CAL FIRE, 2022).

3 Statutory Requirements for Wildfire Mitigation Plans

A. Statutory Requirement Overview

PUC §8387(b)(2) lists the statutory requirements for WMPs. These are the specific elements that the independent evaluator must review to make its determination for this report. The specific elements that must be addressed in CPAU's WMP are included in Table A (see Attachment A) and are summarized here for reference.

- Staff Responsibilities
- General Objectives
- Wildfire risk reduction program descriptions.
- The metrics used to evaluate the wildfire mitigation plan's performance.
- How the application of previously identified metrics has informed the wildfire mitigation plan.
- Protocols for reclosers, de-energization, and Public Safety Power Shut-off (PSPS)
- Procedures for community notification and outreach.
- Vegetation Management Plans
- Electrical Equipment and Infrastructure Inspection Plans.
- Description of wildfire risks, and drivers for those risks, throughout the service territory, including design, construction, operation, and maintenance of equipment and facilities, and topographic and climatological risk factors.
- Identification of any geographic area in the service territory that is a higher wildfire threat than is identified in a commission fire threat map.
- Identification of enterprise-wide safety risk and wildfire-related risks.
- How the service will be restored after a wildfire.
- The processes and procedures used to monitor and audit the implementation of the wildfire mitigation plan, identify any deficiencies, and the effectiveness of electrical line and equipment inspections.

3.1 Detailed Review of Statutory Requirements

A. Minimizing Wildfire Risks

PUC §8387(a) requires the following: "Each local publicly owned electric utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment."

The CPAU's WMP and the CPAU documents referenced in the WMP comprehensively describes the safety-related measures that the CPAU follows to reduce its risk of causing wildfires. Dudek has determined that CPAU complies with this requirement through the design of its system, its operational procedures, and the implementation of wildfire risk reduction and wildfire response strategies specifically the utility's commitment to undergrounding its existing above ground circuits in the High Fire Threat District.

B. Evaluation of WMP Elements

Dudek found that CPAU's WMP meets the statutory requirements of comprehensiveness per PUC §8387. The review of the WMP's elements is summarized relative to the application of the WMP. The table in Attachment A

lists each required element for CPAU's WMP and provides Dudek's initial assessment of the comprehensiveness of that element within the WMP that was reported to the CPAU in our first review in February and our final assessment.

Below is a summary of the WMP elements as required by PUC §8387, including restating sections of the WMP where applicable.

8387(b)(2)(A): Responsibilities of Persons Responsible for Executing the Plan.

Chapter 3 A of the CPAU WMP comprehensively describes staff responsibilities and functions in the implementation of their WMP including vegetation management, inspections, system maintenance, and system design.

8387(b)(2)(B): Objectives of the Wildfire Mitigation Plan

Chapter 2 B of the CPAU WMP comprehensively describes the CPAU's two objectives.

8387(b)(2)(C): Prevention Strategies and Programs

Chapter 4 in the CPAU WMP describes the utility's wildfire prevention strategies. The chapter is a combination of risk-drivers and mitigation strategies. The WMP describes the risk driver and then the strategy used to address the risk.

8387(b)(2)(D): Metrics and Assumptions for Measuring WMP Performance

Chapter 5 section B describes the metrics the CPAU uses to evaluate the effectiveness of their WMP. Five metrics are described: three performance metrics and two outcome metrics.

8387(b)(2)(E): Impact of Previous Metrics on WMP

Chapter 5 section C of the CPAU WMP describes the metrics used on previous versions of the WMP including the data collected by the utility since 2020.

8387(b)(2)(F): Reclosing Protocols

Chapter 4 section C in the CPAU's WMP describes the utility's reclosing protocols specifically that there is only one recloser on lines within their High Fire Threat District and that these reclosers are disabled specifically to reduce the risk of a wildfire ignition.

8387(b)(2)(G): De-energization Notification Procedures

De-energization is described in Chapter 4 section C and Chapter 3 section C. Chapter 4 describes the conditions under which de-energization would be considered and who the CPAU would coordinate with to make the decision to de-energization. Chapter 3 describes who at the CPAU is responsible for notifying customers of a de-energization event and how the CPAU contacts customers who will be impacted and a general message. Since the CPAU is dependent on PG&E for power, the CPAU is at risk of shut down

initiated by PG&E. CPAU uses the same procedures for notifications regardless of whether the de-energization is initiated internally or externally.

8387(b)(2)(H): Vegetation Management

Chapter 4 section B of the CPAU WMP comprehensively describes in detail the utility's vegetation management program including their clearance standards for surface and aerial vegetation, and the techniques the CPAU uses to perform vegetation management.

8387(b)(2)(I): Inspections

The WMP does not have a specific section that describes the inspection practices the utility uses. Instead, the WMP contains several statements mainly in Chapter 4 that describe where and when the CPAU performs vegetation and equipment inspections.

8387(b)(2)(J)(i): Risks and Risk Drivers Associated with Design and Construction Standards

Chapter 4 in the CPAU WMP describes risks and risk drivers present in the CPAU's service territory. In the introduction for the chapter the CPAU clearly states that they have determined vegetation to be primary risk driver of wildfire in their service territory. Section C contains a brief description of risk drivers associated with design and construction standards.

8387(b)(2)(J)(ii): Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors

Chapter 4 in the CPAU WMP describes risks and risk drivers present in the CPAU's service territory. In the introduction for the chapter the CPAU clearly states that they have determined vegetation to be primary risk driver of wildfire in their service territory. Section A & B in this chapter provide a more detailed discussion of climatological and topographical risk drivers.

8387(b (2)) (K): Geographical Area of Higher Wildfire Threat

There is statement in Chapter 2 section B regarding the current extent of the High Fire Threat District in the CPAU and the utility's recommendation to maintain the current extent.

8387(b)(2)(L): Enterprise-wide Safety Risks

The WMP describes that the CPAU uses a risk assessment process that has been developed and is implemented by the City's Office of Emergency Services (OES). The OES, in collaboration with City Departments has created several risk assessments and risk management plans that are relevant to the electrical operations of the CPAU and address wildfire and safety related risks (Threat and Hazard Identification and Risk Assessment Report, Local Hazard Mitigation Plan, etc.).

8387(b)(2)(M): Restoration of Service

Chapter 4 section C describes the CPAU's power restoration process after a wildfire or de-energization event. A full description of their restoration policy is in Appendix B of the WMP.

8387(b)(2)(N)(i): Monitoring and Auditing WMP Implementation, 8387(b)(2)(N)(ii): Identifying and correcting WMP deficiencies, 8387(b)(2)(N)(iii): Monitoring and Auditing the effectiveness of inspections.

Chapter 5 section of the CPAU WMP provides a brief description of how the utility monitors and audits the implementation of the strategies described in Chapter 4. Chapter 4 also contains statements on how the CPAU uses inspection results to identify issues and improve their electrical system.

4 Wildfire Safety Advisory Board Guidance Advisory Opinions

In November 2022 the WSAB published a report (California Wildfire Safety Advisory Board Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electrical Cooperatives) with a description of general recommendations for improving the Wildfire Mitigation Plans for publicly owned utilities and rural electrical cooperatives (POUs). In addition, the report provided specific recommendations for each utility that submitted a WMP for review by the board. Dudek reviewed the WSAB's report, and the section below contains a summary of each recommendation the WSAB had for the CPAU's 2022 WMP and whether the 2023 WMP has addressed the WSAB's recommendation. It should be noted that the materials published by the WSAB and the recommendations within are for 'guidance' and not statutory requirements.

1. The WSAB likes the added detail about WMP adoption, with plans being presented to the Advisory Committee. For the 2023 comprehensive revision WMP, these practices should remain, per the proposed new WSAB WMP template.

   The CPAU WMP includes the WMP adoption policy in Chapter 1 section C of the plan.

2. The WSAB greatly appreciates Palo Alto's additional descriptions of city climate change actions, and encourages continued attention to this crucial issue, including revisited consideration of drone technology or explaining in more detail why it is inappropriate in this case.

   The 2023 CPAU WMP does not include any statements about the implementation of a UAV or drone aerial inspection program. The CPAU does not have long stretches of poles where drone technology would be effective. CPAU will continue to perform visual inspections of the 11 miles of aboveground wires. This number will decrease as progress is made underground wires in the High Fire Threat District.

3. The WSAB appreciates and commends Palo Alto's detailed PSPS policies, including the new PSPS customer communication policy (found in Appendices F and G). In addition, the WSAB welcomes the consideration of backup generation to potentially limit the customer impact of PSPS and other outages in the area.

   The CPAU WMP does not include any discussion of backup generators. Based on the information in the plan and discussions with CPAU staff, it is the opinion of the Independent Evaluator that this is because the CPAU has correctly identified the wildfire risk and risk drivers in their service territory and have determined that the wildfire mitigation efforts are best directed at reducing wildfire risk in the high fire threat district.

4. The WSAB looks forward, as promised in the 2022 Palo Alto WMP, to the consideration of new metrics (including performance metrics) in the 2023 comprehensive revision WMP, and thanks Palo Alto for including information in the current WMP about metric tracking results (0 fire ignitions)

   The 2023 CPAU WMP contains 5 metrics. These metrics better describe the risk drivers present in the CPAU service territory and the effectiveness of the WMP wildfire prevention strategies.

5 CPAU 2022 Progress in implementing WMP Wildfire Prevention Strategies

The CPAU's 2022 accomplishments for the wildfire prevention strategies described in their WMP were provided by CPAU staff. The CPAU accomplished the following:

Vegetation Management

For the entire Service Territory:

- 4,689 trees trimmed away from primary and secondary lines.
- 99 electrical services cleared.
- 31 poles cleared of both brush and encroaching trees.
- 11 whole tree removals for Right Tree, Right Place program
- 50 trees trimmed away from streetlights/traffic signals.

In the High Fire Threat District

- 124 Trees trimmed away from primary and secondary lines.
- 15 poles cleared of both brush and encroaching trees.
- 7,000 square feet of access trail cleared of brush.

Inspections

- Completed Inspections in High Fire Threat District in September 2022.
- 11 miles of aboveground wires in the High Fire Threat District
- 202 Poles in High Fire Threat district
- 167 Underground locations (transformers, vaults, load cabinets.)

Operational Practices

- An inspection audit was completed by Operations Department, Compliance Team in Fall 2022.

System Hardening

- 84 poles and 340 crossarms have been replaced since July 1st, 2022 (the majority of these are NOT in the foothills area; we are not able to easily separate this data but will start working on that for next year).
- A total of ~12000ft of substructure install and underground wire pull in the Foothills will be completed by July 1st, 2023. ~50 poles will be de-energized, and pole removal process will begin next.

6 WMP Metric Overview

Metrics help POUs determine if their wildfire prevention strategies are effective for reducing the risk of a wildfire ignited by their electrical equipment. In 2020 the California Municipal Utilities Association published a Wildfire Mitigation Plan template for POUs to use in the preparation of their WMPs. This template included two metrics: number of fire ignition events and wires down events. These two metrics are general in nature and do not provide the POU a lot of information about the effectiveness of their wildfire prevention strategies. As POUs have gained more experience with their WMPs they have either adopted new metrics or added supplemental data such as location, cause, and whether the event occurred in a HFTD that increases the usefulness of these two metrics.

The CPAU used the two initial metrics plus one additional metric, outages on overhead lines in the High Fire Threat District in the previous versions of their WMP. The 2023 WMP incorporates three new metrics. The WMP's five metrics are organized into two categories: performance metrics and outcome metrics. Performance metrics includes vegetation management accomplishments, infrastructure maintenance, and system hardening project status. The outcomes metrics include outages on overhead lines in high fire threat district, new wildfire ignitions and wires down. The CPAU supplements the data collected for these metrics by including whether metric happened in or outside of the High Fire Threat District. The CPAU has not begun collecting data for the new metrics yet. A summary data for the previous metrics is included in the WMP and detailed data shown on Table 1, 2, and 3 below is based on conversations with CPAU staff.

Table 1: Metric 1-Outages to the overhead lines in the high fire threat area

Date	Fire Threat Zone	Line Voltage	Cause
3/11/2022	Tier 2	12,470V	Car hit pole
3/9/2023	Tier 2	12,470V	Branch on line

Table 2: Metric 2-Fire Ignitions

Date	Fire Threat Zone	Line Voltage	Cause
n/a	Tier 2	- -	No fires Reported

Table 3: Metric 3-Wires Down

Date	Fire Threat Zone	Line Voltage	Cause
n/a	Tier 2	-	No wires down Reported

These three metrics with the supplemental data are useful for informing the CPAU about the effectiveness of their wildfire prevention strategies and if the utility is making progress reducing the risk of a wildfire being started by their electrical equipment. As the CPAU collects data of its new metrics there is the potential that this new data will provide CPAU staff with a more accurate assessment of the effectiveness of their WMP and provide some direction where they can place their wildfire prevention efforts.

7 Comparison of Industry Standards and Similar Utility Wildfire Prevention Strategies

As part of our review of the CPAU's 2023 wildfire mitigation plan, Dudek compared the wildfire prevention strategies described in the plan to the strategies being implemented by POU's that are like the CPAU in terms of service territory size, customer class, owned assets, and wildfire risk. The City of Palo Alto is only the city of its immediate neighbors that has its own public electrical utility. There is only one other POU in the bay area, Silicon Valley Power (SVP), but is significantly different from CPAU (larger customer base, remote assets, no WUI in the city limits, etc.).

For this independent evaluator's report Azusa Light and Water (ALW) and the Banning Electric Utility (BEU) were selected to compare the CPAU's wildfire prevention strategies to. The CPAU, the ALW and BEU have similar assets including customers and customer population, and all three have a service territory that consists of two sharply distinct areas; a densely urban area and sparsely developed wildland urban interface. Additionally, all three utilities are using undergrounding as their principal means to reduce wildfire risk in their high fire threat district. The BEU and ALW differ from the CPAU in that both of their service territories have experienced several large wildfires where the CPAU has not.

Vegetation Management

All three utilities implement vegetation management programs that meet GO 95 requirements. The CPAU and BEU vegetation management programs include the management of surface vegetation around and beneath electrical equipment with the specific goal of preventing the rapid spread of a new wildfire ignition. Azusa Light and Water does not have a surface vegetation management program for its assets in the high fire threat district. All three utilities rely on manual treatment techniques (e.g., crews with hand tools or powered equipment) to complete the vegetation treatment work. For all three utilities vegetation contact with wires is identified as a significant wildfire risk driver in the aboveground portions of the system and their vegetation management programs direct most of their efforts towards tree trimming and the removal of dead trees that could strike their wires.

The CPAU is unique in that their lines run through large open space areas and their vegetation management program incorporates treatment of the surface vegetation (mowing, dead brush removal, etc.) along roadways in the the power line right-of-way.

System Hardening

Undergrounding

All three utilities utilize undergrounding as one of their primary system upgrade strategies to reduce wildfire risk in their high fire threat districts. The CPAU completed approximately 7500 ft and the BEU completed approximately 2800 ft of undergrounding. Azusa Light and Water has %100 undergrounding in their high fire threat district. Undergrounding is considered an industry standard for reducing the risk of wildfire from electrical equipment and many POUs have some policy towards its use. The CPAU has a wildfire prevention strategy that incorporates undergrounding and is making progress in utilizing this strategy.

Equipment Upgrades

The CPAU and BEU ongoing upgrade programs that are designed to reduce the risk of outage, equipment failure, and new wildfire ignitions. These include:

- Installing animal deterrents such as raptor framing and squirrel guards.
- Replacing wooden pole crossarms with non-combustible fiberglass cross arms

Azusa Light and Power has no above ground wires in the high fire threat district and does not utilize any of these strategies.

Pole inspection and hardening

The CPAU and BEU both have a pole inspection programs that involve visual inspection and periodic intrusive testing of wooden utility poles. Both utilities have pole reinforcement programs that include hardening the pole against wildfire using protective wraps or applications of fire-retardant material.

Recloser Policy

All three utilities have recloser policies for circuits in their High Fire Threat Districts where the recloser is set to manual reclosing operations.

8 Conclusion

The City of Palo Alto Public Utilities Department has prepared a comprehensive Wildfire Mitigation Plan for 2023. The plan does meet the statutory requirements described in PUC 8387 (b)(2) for a publicly owned utility. The CPAU has also considered the recommendations of the Wildfire Safety Advisory Board and revised their WMP appropriately. The CPAU's WMP with the provided appendices describes a wildfire mitigation program that accurately assesses the risks and risk drivers present in their service territory and implements preventative strategies with a focus on undergrounding lines in the HFTD that are effective at reducing the wildfire risk of these risks and risk drivers.

Based on the wildfire prevention programs described in the WMP and the progress the CPAU has made in its wildfire prevention programs, the CPAU takes the risk of wildfire in its service territory seriously and is actively working to the reduce the risk that its equipment starts or aids in the spread of a wildfire.

Sincerely,

Jeremy Cawn
Fire Protection Planner

References

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Wildfire Safety Advisory Board. (2022). *Guidance Advisory Opinion of the 2023 Wildfire Mitigation PLans of Electric Publicly Owned Utilities and Rural Electrical Cooperatives*. Sacramento: Office of Energy Infrastructure Safety.

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Attachment A: CPAU WMP Independent Evaluator's Report Summary Tables

2023 Palo Alto Utilities WMP IE Report

Summary Tables

	CPUC Requirement		
Public Utility Code 8387(b)(2)	**Description of Required Element**	**Initial Review Comment**	**Final Review Comment**
A	Staff Responsibilities	Needs more information. Describe which staff member position oversees inspections, vegetation mgmt., training, community outreach, etc.	Updated. Good.
B	General Objectives	Good. Three objectives listed. Maybe expand the description of improving resilience.	Good.
C	Program Descriptions	Good. Appendix A contains a comprehensive description of mitigation actions being done by CPAU	Good.
D	Evaluation Metrics	Good. The 2023 WMP introduces five metrics in two categories: performance and outcome metrics. Three of the new metrics are the metrics from the 2022 WMP.	Good.
E	Lessons learned, metrics application	Good. Describes how the metric is relevant to the 2023 plan and provides data since the WMP was created.	Good.
F	Protocols for reclosers, de-energization, and PSPS mitigation	Good.	Good.
G	Community Notification	Good. Describe how PAU sends these messages". This procedure includes proactively distributing a specific recorded message to customers living in the Foothills area, and a more general but still targeted message to all customers. These messages are sent prior to deenergizing lines, to allow residents time to act, if necessary."	Updated. Good.

H	Vegetation Management	Needs more information. Describe where brush cutting and mowing are used and how much clearance around assets is being created. "Palo Alto utilizes a variety of vegetation treatment methods to reduce the risk of wildfire, including tree or branch removal, trimming, mowing, brush cutting, discing, and herbicide use."	Updated. Good.
I	Infrastructure Inspections	Good. Minimal.	Good. I recommend combining all of the inspection related statements in the WMP into one section titled "Inspections"
J(i)	Grid Design, construction, and operation risks	Needs more information. Describe the risk drivers, for example "CPAU has lines that run through open space areas with dense vegetation." This may be a 'common' issue amongst POUs but it's CPAU specific too. It's also called out in the city's risk assessment report.	Updated. Good.
J(ii)	Vegetation, topographic, and climate risks	Good. Identifies tree/vegetation contacts as the primary risk driver in CPAU.	Good.
K	Identification and expansion of higher wildfire threat areas	Not included	Updated. Good. In the middle of a paragraph in Chapter 2 Section B.
L	Identify enterprise-wide risk	Not included	Updated. CPAU uses a City of Palo Alto developed risk assessment process developed by the City OES.
M	Restoration of Service	Good.	Good.
N(i)	Monitoring and auditing of WMPs	Good.	Good.
N(ii)	Identifying and correcting deficiencies	Needs more information. Describe how CPAU reviews and updates your WMP. For example, the updated metrics.	Updated. Good.
N(iii)	Monitoring asset inspections	Good.	Good.

PAU Specific WSAB Recommendations

WSAB 2023 POU WMP Guidance Advisory Opinion	Description of the WSAB Recommendation	Initial Review Comment	Final Review Comment
A3-42	The WSAB looks forward, as promised in the 2022 Palo Alto WMP, to the consideration of new metrics (including performance metrics) in the 2023 comprehensive revision WMP,	Good. CPAU re-worked their WMP metrics into two categories with a total of 5 metrics.	Good.

Independent Evaluator's general WMP Comments

Location	Page	Initial Review Comment	Final Review Comment
1. Utility Overview and Context	1	Context Table-Prevailing Wind Direction and Speed. The link does not work. Please provide the text describing prevailing winds or fix the link.	Corrected.
2. Plan Purpose and Objective	4	Based on past WSAB guidance documents, WSAB wants quick access to WMP information including attachments, I recommend including the relevant appendices. To avoid redundancy, we also do not include appendixes submitted in prior years, although we may refer to them. This is not to short shrift our efforts, but rather to acknowledge that both CPAU and the Board have limited resources to write and review Plans, the Board has already reviewed the appendixes and offered guidance, and recycling past information is not as helpful as providing new information.	CPAU added relevant City documentation as appendices to the end of the document.