May 26, 2023

**Re: Comments on PG&E’s 2023-2025 Wildfire Mitigation Plan**

Dear Office of Energy Infrastructure Safety,

Thank you for the opportunity for voicing our concerns comments on PG&E’s 2023-2025 Wildfire Mitigation Plan (WMP).

We are a group of neighbors in the Oakland Hills area known as the Montclair District. We are extremely concerned with the wildfire risk posed by the overhead PG&E powerlines in our neighborhood which is situated in a densely wooded area. Undergrounding the powerlines is needed to protect our densely populated community with few evacuation routes.

We have had several discussions with PG&E regarding undergrounding the powerlines in Montclair, but PG&E has told us that Montclair is not in their undergrounding plans because (a) their risk model does not show Montclair’s risk is in the highest tier, and (b) they have been performing some overhead hardening in Montclair.

After reviewing the PG&E WMP, we believe the PG&E WMP and the Risk Model fail to address the following points that heavily impact Montclair:

1)     **The current PG&E WMP risk model does NOT include these extremely critical risk factors:**

**- population density**

**- limited ingress/egress**

Due to the dense population in Montclair, coupled with the very limited narrow and windy roads available for evacuation and fire-fighting access, these risk factors are a matter of life and death in a wildfire in Montclair.  These factors should be weighted heavily in PG&E’’s risk model in evaluating wildfire risk, especially in Montclair.

2)  **The WMP risk model should place strong emphasis on areas located adjacent to sites that were burnt in disastrous firestorms that have similar wildfire risks**.

  Montclair is adjacent to the site of 1991 firestorm in the Oakland Hills.  Montclair's

    - topography,

    - dense vegetation and tall trees,

    - climate patterns,

    - dense population, and

    - proximity of houses

are similar to the area burnt in the 1991 Oakland Hills Firestorm.  With climate change and the increasingly longer, hotter and dryer fire seasons in recent years, the wildfire risk in Montclair is multifold higher than that in 1991.  These risk factors should be **weighted heavily** in the risk model in evaluating wildfire risk in Montclair.

3)    **The WMP risk model should factor into the unique weather pattern of a locality**, **such as a neighborhood located near a forested canyon and subjected to strong and dry canyon winds.**

Montclair is next to Shepherd Canyon, which is like a wind tunnel drawing strong canyon winds into the Montclair neighborhood.  This strong canyon wind is unique in Montclair and does not affect other neighboring areas.  Shepherd Canyon is covered with tall trees and dense and dry vegetation.  Residential houses are densely located around Shepherd Canyon.  A small spark caused by an overhead powerline will quickly be fanned into a firestorm by the canyon wind fueled by the trees and vegetation.  The consequence will be disastrous loss of human lives and properties.  The WMP risk model should take into account the *unique* nature of local weather pattern in Montclair.

4)     **The WMP risk model should take into account the history of fires caused by PG&E powerlines in the neighborhood**.

In 1995, a fire in Montclair was caused by sparks falling from PG&E's overhead powerlines that were whipped by wind.  The sparks ignited a fire on the slope of Shepherd Canyon below Asilomar Drive and destroyed several houses.  PG&E admitted fault and accepted liability.

This kind of wildfire can happen anytime by the crisscrossing overhead powerlines in Montclair. A powerline spark caught by the dense and tall trees, whipped by wind, will cause a disastrous wildfire killing people who can’t evacuate because of the few narrow roads serving a dense population of this size in Montclair. The risk model should factor in the history of wildfires caused by PG&E in the neighborhood and require undergrounding to prevent future wildfires.

5)     **The WMP risk model should identify a location for undergrounding when overhead hardening is NOT considered effective.**

PG&E's WMP (page 339) states that: "*Overhead system hardening, including [Covered Conductor] installation, is effective in several environments including:*

*(a) areas with low PSPS risk that have minimal tree fall-in risk with more short, grassy fuels;*

*(b) areas with limited risk associated with entering and exiting (referred to as ingress and egress); or*

*(c) in extreme terrain where undergrounding is not feasible."*

  None of these environments stated above is applicable to Montclair that make overhead hardening effective:

    (a) Montclair has high PSPS risk and high tree fall-in risk, as evidenced by the numerous PSPS incidents during the dry and windy season and the many recent tree falling incidents involving tall trees;

    (b) Montclair has only 2-3 narrow and windy roads as main evacuation routes for a dense population, so it has tremendous high risk associated with ingress and egress;

    (c) Montclair's terrain is feasible for undergrounding, as evidenced by PG&E's ongoing undergrounding of powerlines in adjacent neighborhood Piedmont Pines that has similar terrain.

    As such, according to PG&E's own statement in the WMP cited above, overhead hardening is NOT effective for wildfire mitigation in Montclair.  This is contrary to PG&E's reason for not including Montclair in their undergrounding plan.  When overhead hardening is not effective, PG&E’S risk model should include Montclair in their underground plan.

6)    **The risk model should factor in the vulnerability of the residents in the community**, **such as the population of elderly people and young children.**

  A considerable percentage of the population in Montclair are elderly people and young children.  These residents are much more vulnerable in the event of a wildfire and power shut-offs (PSPS). They are susceptible to risk of smoke in a wildfire, and difficulty in evacuation. The risk model should take into account community vulnerability in evaluating wildfire risk.

As we are extremely concerned of the wildfire risk in Montclair, the neighborhood has started a petition to collect signatures to urge CPUC and OEIS to require PG&E to underground the powerlines in Montclair. The petition has collected close to 2,000 signatures in less than two months.

Based on the above, we respectfully request OEIS to carefully consider the above factors in reviewing PG&E’s risk model and WMP. Please do NOT approve PG&E’s WMP until the above risks are adequately addressed.

Thank you for your attention.

Respectfully,

(Electronically signed)

Brenda So

On behalf of the Undergrounding Montclair Working Group