To the CPUC:

My name is Janani Ramachandran, and **I am the Oakland City Councilmember representing District** **4**, which includes Montclair neighborhoods. **I am writing to express my serious concern about PGE&E’s WMP risk model, and explain why neighborhoods including Montclair have extremely critical risk factors that make undergrounding of powerlines essential for meaningful wildfire prevention efforts.**

**The current PG&E WMP risk model does NOT include two extremely critical risk factors:** **population density and 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. These factors should be weighted heavily in the risk model in evaluating wildfire risk in Montclair. As the 1991 Hills Firestorm have shown us, lack of access to adequate evacuation routes / limited ingress and egress make the danger to loss of life and property exponentially more serious. As a Montclair resident myself, I see these risk factors around me on a daily basis and have serious concerns were a tragic wildfire to re-occur.

**Moreover, the WMP risk model should place strong emphasis on areas located adjacent to sites that were burnt in disastrous firestorms. 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 of 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.

**In addition, 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 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 can quickly be fanned into a firestorm by the canyon wind fueled by the trees and vegetation. The consequence can be disastrous losses of human lives and properties. The WMP risk model should take into account the *unique* nature of local weather pattern in Montclair.

**The WMP risk model should also 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.

**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, because 1) 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 tree falling incidents involving tall trees; 2) 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; and 3) 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 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 should include Montclair in their underground plan.

**Finally, the risk model should factor in the vulnerability of the residents in the community**, such as the elderlies and young children. A considerable percentage of the population in Montclair are elderly residents and young children. These residents are much more vulnerable in the event of a wildfire and power shut-offs (PSPS).

Thank you for consideration of this comment. If you have any questions for me, please feel free to reach out directly at jramachandran@oaklandca.gov. You can also reach my Chief of Staff Amber Childress at achildress@oaklandca.gov.

Sincerely,

Janani Ramachandran, Esq.

Janani Ramachandran (she/her)

Councilmember, City of Oakland District 4

1 Frank H. Ogawa Plaza | Oakland, CA 94612

(510) 238-7004 | JRamachandran@oaklandca.gov