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To Whom It May Concern:

This letter is in response to a request for comment to PG&E's 2023 Wildfire Mitigation Plan.

My family has lived in the Oakland Hills' Montclair area for almost 70 years.

I am shocked to learn that this plan does not include the Oakland Hills' Montclair district in the plans to underground powerlines as part of the 10,000 miles undergrounding project, which was proposed specifically to reduce fire risk.

The Oakland Hills' Montclair District falls in the "Very High Fire Risk Area" as designated by CalFIRE. The immediate area is densely-populated, with only 3 streets to safety for over 10,000 residents, and proximity to one of the largest fire storms in US history is one of the highest risk areas in California. Should a fire occur in our area, we have one of the highest potential – if not the highest potential – for widespread property damage and catastrophic human casualties in California.

This is a fire trap, and PG&E's lines make it substantially worse.

In reviewing the 2023 PG&E WMP plan, here are my specific issues:

1) The risk model in the WMP plan does not include the risk factors of population density combined with limited ingress/egress. The Oakland Hills' Montclair area has narrow and windy roads which would be further severely compromised should powerlines be downed during a fire. Residents will not be able to exit, and emergency vehicles will not be able to enter. As mentioned above, there are only 3 roads to safety, serving 10,000 residents. These factors should be weighted heavily in the risk model in evaluating wildfire risk in Montclair to avoid human fatalities. So far, they appear to be absent.

2) The Montclair District is prone to high, dry winds, especially in the fall. It is located immediately adjacent to the site of the 1991 Oakland firestorm that killed 25 people, burned 3800 homes in one day and caused over \$3 billion dollars in damage in one day. The area shares the same topography, dense vegetation, climate patterns and population density.

My family narrowly survived the 1991 firestorm, with my aging father stuck in our home and no one around to evacuate him. Had the fire moved 3 miles, he would have burned in our home. These risk factors should be weighted heavily in the risk model in evaluating wildfire risk in Montclair. So far, they appear to be absent.

3) PG&E also has a history of causing wildfires in our area. Right behind my home, three homes burned in 1995 due to sparks caused from PG&E's overhead lines whipped by wind. Had this gone out of control, our home would have surely burned. PG&E admitted fault and accepted liability for this fire.

Another incident occurred right in front of my home last fall (October, 2, 2023 during high fire risk season) when sparks caused by overhead PG&E lines resulted in a power outage until it was repaired. These could have sparked another fire. Other examples include nearby fallen trees that have caused lines to fall and more power outages. Incidences in our area are plentiful. Again, these known risk factors should be weighted heavily in the risk model in evaluating wildfire risk in Montclair.

4) While PG&E has repeatedly told us that "hardening of powerlines" will help to solve the problem in our area, we do not agree. We noted that PG&E's own comments in its WMP plan (page 339), states that hardening is only effective in: *(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."*

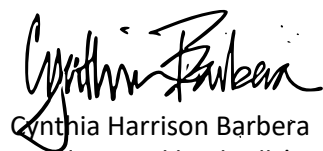
Neither of the environments described under "a" and "b" apply to the Montclair Area. Further, undergrounding of powerlines in our area is feasible, as evidenced by PG&E's ongoing undergrounding of powerlines in adjacent neighborhood Piedmont Pines that has similar terrain. PG&E notes that undergrounding is the safest way to mitigate fire risk and we agree with this.

5) I am also extremely concerned about the overall vulnerability of our community. A considerable percentage of 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). My mother needed oxygen during some of the ever-frequent PSPS times over the past years, which caused considerable risk to her life and health during frequent power shut-offs. Power shut-offs (PSPS) as an alternative to undergrounding of powerlines is not a good solution to mitigate fire risk and puts many residents at heightened risk due to health factors. These risk factors should be taken into account in the risk model.

For these and many other reasons, I urge OEIS in its oversight capacity NOT to approve PG&E's 2023 Wildfire Mitigation Plan (WMP) until population density combined with egress/ingress, and risk to health is included in the overall risk model and weighted according to extraordinary potential for human casualties.

I further urge OEIS to require PG&E include the Oakland Hills' Montclair District in their immediate plans to underground powerlines on an accelerated schedule before another firestorm disaster occurs.

With regards,



Cynthia Harrison Barbera  
Resident, Oakland Hills' Montclair District.