

5/22/23

As a resident of the Oakland Hills/Montclair neighborhood since 1990, we firmly believe that utilities should be undergrounded in this neighborhood as part of PG&E's 2023-2025 Wildfire Mitigation Plan (WMP).

We are not eligible for standard fire insurance coverage because our address is in an area zoned as high risk for fire. Consequently, we pay a very high premium to be insured by Cal Fire. This fact, in and of itself, should warrant this area's inclusion in the undergrounding project.

Furthermore:

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. These factors should be weighted heavily in the risk model in evaluating wildfire risk in Montclair.

We were evacuated during the 1991 firestorm and the experience was harrowing and chaotic.

2) **The WMP risk model should place strong emphasis on areas located adjacent to sites that were burnt in disastrous firestorms.** Parts of Montclair burned during the 1991 firestorm in the Oakland Hills. Montclair's

- topography,
- dense vegetation and tall trees,
- climate patterns,
- dense population, and
- proximity of houses

make Montclair especially prone to wildfire risk. 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 includes 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 will quickly be fanned into a firestorm by the canyon wind fueled by the trees and vegetation. The consequence will 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.

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.

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:

(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 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 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.

6) **The risk model should factor in the vulnerability of the residents in the community,** such as the elderly 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).

Please reconsider the proposed plan and include the Montclair neighborhood in PG&E's undergrounding scheme.

Kind regards,
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