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Dear Office of Energy Infrastructure Safety Officials,

Thank you for your invitation to submit comments on PG&E's WMP Risk Model. As the City of Oakland's Chief Resilience Officer, I coordinate our Wildfire Prevention Working Group that is an interdepartmental team working to reduce the risk of wildfires in Oakland.

Oakland's Montclair Neighborhood is almost exclusively in a Very High Fire Severity Zone according to CalFIRE and due to the density of housing and narrow evacuation routes, the City is taking many precautions and appreciates a positive partnership with other public agencies in that effort including Caltrans, neighboring jurisdictions, and PG&E. However, the City believes the risk model is insufficient in how it has ranked the Montclair area for several reasons stated below.

The current PG&E WMP risk model does not put the correct amount of weight on the critical risk factors of 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 and should be weighted heavily in the risk model in evaluating wildfire risk in Montclair.

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 areas with low PSPS risk that have minimal tree fall-in risk with more short, grassy fuels, areas with limited risk associated with entering and exiting, and in extreme terrain where undergrounding is not feasible."

None of these environments stated above is applicable to Montclair which has high PSPS risk and *very 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. In fact, our City work crews are still backlogged in clearing the hundreds of trees that fell during the winter storms months ago because the damage was so extensive. 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. Last, Montclair's terrain is not feasible for undergrounding, as evidenced by PG&E's ongoing undergrounding of powerlines in adjacent neighborhood Piedmont Pines that has similar terrain.

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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.

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.

The City of Oakland recognizes that PG&E has taken many steps in hardening certain facilities in Oakland but believe that undergrounding is the best option. In the WMP, PG&E cites the reduction in wildfire risk by undergrounding to be at 99% while no other tactic has a numerical value that can compare. While PG&E is trying to balance the many priority areas they serve statewide, and undergrounding in the Bay Area, may seem more difficult due to our higher housing and construction costs, our residents deserve the same consideration.

I am happy to discuss this further and can be reached at [jdevries@oaklandca.gov](mailto:jdevries@oaklandca.gov)

Respectfully,



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Deputy City Administrator and Chief Resilience Officer  
City of Oakland