



PUBLIC UTILITIES COMMISSION  
STATE OF CALIFORNIA  
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102

**To:** State Clearinghouse, Responsible and Trustee Agencies, Property Owners & Interested Parties

**From:** Ms. Tharon Wright, CPUC Project Manager

**Subject:** Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and Notice of Public Scoping Meeting for the Moraga-Oakland X Project (A.24-11-005)

**Date:** February 25, 2025

## Introduction

Pacific Gas and Electric Company (PG&E) filed a Permit to Construct (PTC) application (A.24-11-005) with the California Public Utilities Commission (CPUC) for its proposed Moraga-Oakland X 115 kilovolt (kV) Rebuild Project (Project). The Project is being considered in the 2024-2025 CAISO Transmission Planning Process (TPP), but it was not part of a competitive bid process because it is a maintenance project and rated at 115 kV. As such, the purpose of the Project is to replace power line equipment that has reached the end of its useful life. This maintenance is needed for safe operation of the lines. The objectives of the Project are to rebuild the four-circuit power line path with new equipment including replacing the existing conductor with a larger size to accommodate future energy demands, to ensure the lines are rebuilt with adequate line clearances between the ground or land use, and to construct a safe, economical, and technically feasible project that minimizes environmental and community impacts.

The CPUC, as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to analyze the effects of the proposed Project in compliance with CEQA. The CPUC has reviewed PG&E's application submitted on November 15, 2024, and deemed the application complete on December 12, 2024. In order to obtain early feedback on the environmental issues to be addressed in the EIR, the CPUC is initiating the scoping process to inform the CEQA review with a 30-day scoping period from February 25 through March 27, 2025.

## What is Scoping?

The purpose of this NOP is to inform recipients that the CPUC is beginning the scoping process and preparing an EIR for the Project. Scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation. Pursuant to CEQA, the CPUC is requesting comments to inform the scope and content of the EIR and help identify the actions, alternatives, mitigation measures, and environmental effects to be analyzed in the EIR.

This notice includes a brief description of the Project, a brief summary of the anticipated potential impacts, information on public meetings, and how to provide input on the scope and content of the EIR. After the public scoping period has ended, a Scoping Report will be prepared to summarize the comments received. This NOP and the Scoping Report will be included as an appendix to the EIR and is also available on the CPUC's website for the

Project with other Project documents and reports, including PG&E's application and Proponent's Environmental Assessment, at the following link:

<https://ia.cpuc.ca.gov/environment/info/aspen/moraga-oakland/moraga-oakland.htm>

## Project Location

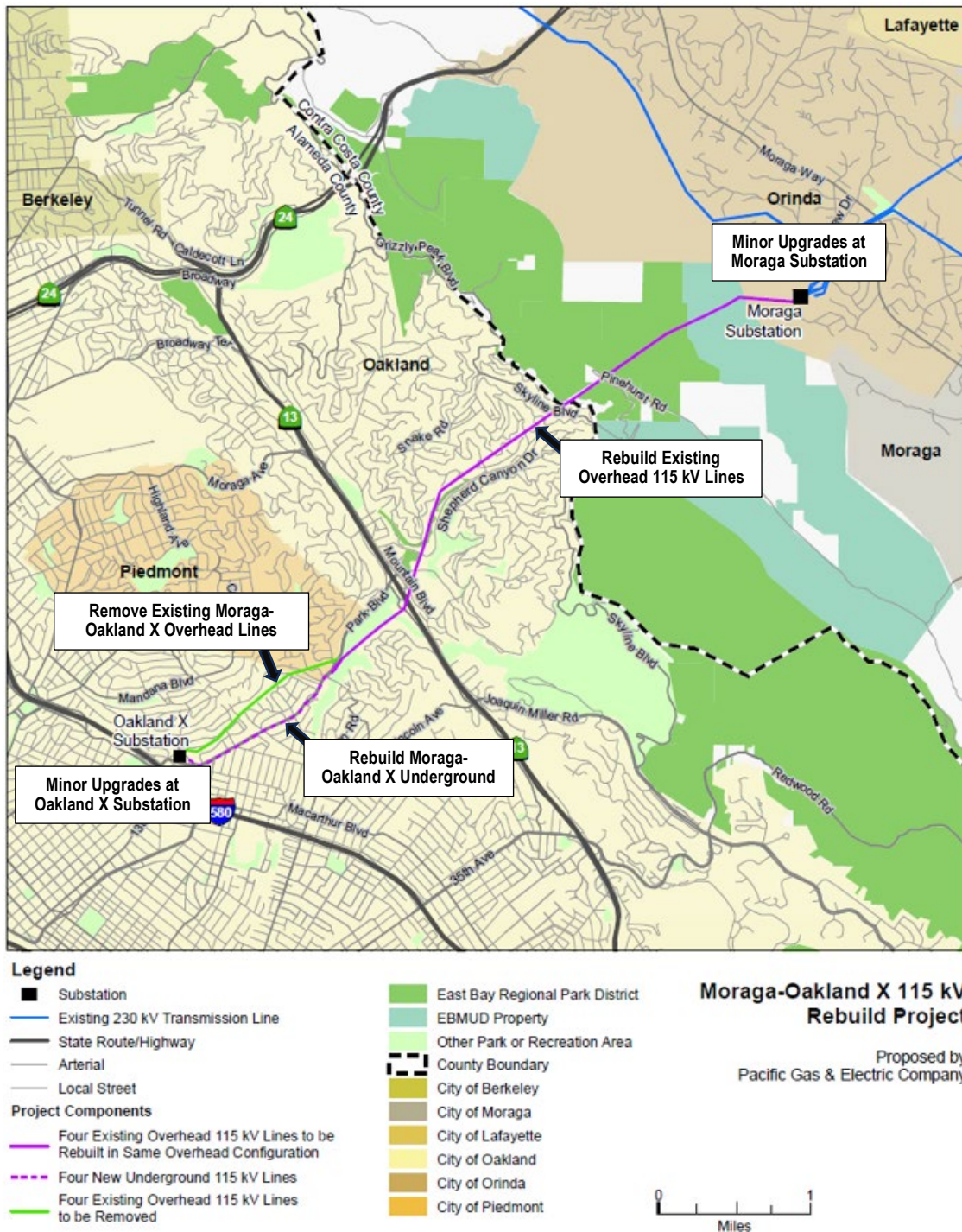
The Project would be located within a portion of unincorporated Contra Costa County and Alameda County, and the cities of Orinda, Oakland, and Piedmont. The following figures depict an overview of the Project in the context of regional jurisdictions. The existing land uses in the Project area include utility in the city of Orinda, open space and parks in unincorporated Contra Costa County, and residential, commercial, parks, places of worship and schools within the cities of Oakland and Piedmont.

## Project Description

The Project would rebuild four overhead 115 kV power line circuits that span approximately 5-miles between PG&E's Moraga and Oakland X substations. The two existing parallel double-circuit lines would be rebuilt as hybrid power lines, meaning the two double-circuit lines between the two substations would have both overhead and underground portions. Existing towers, poles and conductors would be replaced either with overhead rebuild or underground components, and minor modifications would occur within the existing substations. Some recently replaced power line structures would be reused or reused with some modification. Single-circuit transition structures would support the connection between the overhead and underground portions of each circuit. Double-circuit transition structures would be used to connect the underground portion to existing overhead circuit terminals at Oakland X Substation. Additionally, the rebuild would include the installation of a static ground wire and an optical ground wire connecting to each aboveground structures with grounding and a telecommunication cable continuing within the underground portion.

## *Applicant Proposed Measures*

As part of the Project, PG&E has committed to implementing applicant proposed measures (APMs) that are incorporated into the design of the Project. APMs are considered binding measures, and the EIR will evaluate these measures as part of the Project.



## Issues to be Addressed

CPUC has determined that an EIR will be prepared because the Project could result in one or more significant impacts to environmental resources. The EIR will address all of the issues identified in the CEQA Guidelines Appendix G. However, it is anticipated that the Project would have nominal or no impacts to the following resource areas: Land Use and Planning; Mineral Resources; Population and Housing.

## Environmental Effects

PG&E, in its PEA, has not identified any potentially significant or significant and unavoidable impacts associated with the Project. The EIR will independently and objectively evaluate potential environmental effects and the need for mitigation on the following resource areas

- ***Aesthetics:*** The Project area is predominantly urban in nature and would primarily be located within disturbed urban, developed, and parks and open space lands. Some of the power line replacement structures would potentially be visible from Alameda County scenic routes in the Project area. Project components would also be visible by motorists travelling I-580, SR 13, and Park Boulevard, although views would be fleeting. The EIR will evaluate the potential for substantial adverse impacts to scenic vistas, scenic resources, and the existing visual character or quality of public views, and the effects of new sources of light and glare.
- ***Agriculture and Forestry Resources:*** The Project is not located in any areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is it located on any lands under Williamson Act Contracts. The Project would not conflict with existing zoning for agriculture use, nor is it located in any areas zoned as forest land. The EIR will evaluate the effect of the Project on forest lands as defined by PRC Section 12220(g) within regional parks/open space in unincorporated Contra Costa County and parkland in the City of Oakland.
- ***Air Quality:*** It is not anticipated that the Project would exceed any of the Bay Area Air Quality Management District thresholds of significance. The Project area would be located near residential sensitive receptors. The EIR will evaluate the potential for the Project to conflict with or obstruct implementation of an applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
- ***Biological Resources:*** The Project area is predominantly urban in nature and would primarily be located within disturbed urban, developed, and parks and open space lands. The EIR will evaluate the potential for substantial adverse impacts to sensitive vegetation communities, species, and habitats identified in local or regional plans, policies, or regulations, or by CDFW or USFWS, including wetlands and riparian habitat. The EIR will also evaluate the Project's potential for effects on special-status and migratory species, conflicts with local policies or ordinances and habitat that protect biological resources, conflicts with local, regional, or state habitat conservation plans, and the potential for the Project to create a substantial collision risk for birds and bats.
- ***Cultural Resources:*** There are known historical and archaeological resources located within the Project area. Earthmoving and other ground disturbing activities could result in the inadvertent discovery of cultural resources. The EIR will evaluate the potential for an adverse change in the significance of cultural resources and the potential for the Project to disturb human remains.
- ***Energy:*** The EIR will evaluate the potential for the Project to result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation
- ***Geology, Soils, and Paleontological Resources:*** The Project is located within 10 miles of three active faults, including the Hayward Fault, Calaveras Fault, and Concord Fault. No other active faults are located within approximately 10 miles of the project right of way. The Hayward Fault is the only fault within the



project vicinity (100 feet of the project alignment) with an associated Alquist-Priolo Earthquake Fault Zone. The EIR will evaluate the potential for the Project to directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides. The EIR will also evaluate the Project's potential to result in substantial soil erosion, or landslide, lateral spreading, subsidence, liquefaction, or collapse; and the Project's potential effects on paleontological resources.

- ***Greenhouse Gas Emissions:*** The EIR will evaluate the Project's potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and the Project's potential conflict with a plan, policy, or regulation adopted to reduce greenhouse gas emissions.
- ***Hazards, Hazardous Materials, and Public Safety:*** Construction of the Project would require the transportation, use and disposal of hazardous materials including treated wood poles, mineral oil, gasoline, lead-acid batteries, hydraulic fluids, solvents and ethylene glycol. There is potential for unknown contaminated soils to be encountered during construction. The EIR will evaluate the potential for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or a reasonably foreseeable accident.
- ***Hydrology and Water Quality:*** The westernmost area of the Project is located within the East Bay Plain Sub-basin of the Santa Clara Valley Groundwater Basin. Most of the Project area to the east of this sub-basin boundary does not occur within an identified groundwater basin. The existing overhead lines pass through the San Leandro Creek, Sausal Creek, and Indian Gulch/Pleasant Valley Creek watersheds while the proposed underground rebuild portion is located within or along the boundary of the Sausal Creek, Indian Gulch/Pleasant Valley Creek, and Oakland Estuary watersheds. The EIR will evaluate the potential for the Project to substantially degrade surface or groundwater quality, impede sustainable groundwater management, substantially alter existing drainage patterns, risk release of pollutants due to flooding, or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.
- ***Noise:*** The EIR will evaluate whether the Project would result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies and the potential for construction to generate excessive groundborne vibration.
- ***Public Services:*** The Project would not involve developing new residential units or services that would generate a new daytime or residential population in the area. However, several public parks and recreation areas overlap with portions of the Project, and the EIR will evaluate whether a temporary increase in demand would negatively impact park facilities. The EIR will also evaluate whether the Project would potentially impede ingress and egress of emergency vehicles or emergency response times during Project construction.
- ***Recreation:*** The Project would not increase the use of existing neighborhood and regional parks, nor would it require the construction or expansion of recreational facilities. The EIR will evaluate whether the Project would reduce or prevent access to a designated recreation facility or area, or substantially change the character of a recreational area.
- ***Traffic and Transportation:*** The Project could result in the temporary closure of bicycle lanes, pedestrian walkways, transit stops, and roadways during construction. The EIR will evaluate the potential for the Project to conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; create potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations; generate vehicle miles traveled; and result in inadequate emergency access.

- ***Tribal Cultural Resources:*** The EIR will evaluate the Project’s potential effects on tribal cultural resources.
- ***Utilities and Service Systems:*** The Project could require the relocation of existing utilities located in proximity to the transmission lines. According to PG&E, at the current stage of design, no active utility conflicts with underground utilities and no necessary relocations have been identified. However, as design advances, a need for relocation may be identified. Utility relocation could include sanitary sewer, stormwater, gas, water, electric and telecommunication. The Project will not require new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities outside of the scope of the Project.
- ***Wildfire:*** Portions of the Project are located in areas identified as “very high” Fire Hazard Severity Zones (FHSZs), including some in State Responsibility Areas and in Local Responsibility Areas. The EIR will evaluate the potential for the Project to impair emergency response or evacuation plans, or exacerbate fire risks and thereby expose Project area occupants to pollutants or significant risks.

### *Mitigation Measures, Cumulative Impacts, and Alternatives*

The EIR will include CPUC’s independent evaluation of the potential effects described above and other potentially significant environmental effects of the Project, including those resulting from its construction, operation, and maintenance. Where necessary and feasible, mitigation measures will be recommended (in addition to or to supersede PG&E APMs) to avoid or reduce potentially significant impacts. The EIR will also address potential cumulative environmental impacts of the Project, when considered with past, other current, and reasonably foreseeable future projects in the region.

The EIR will include a discussion and analysis of a reasonable range of alternatives to the Project, including a No Project alternative scenario, and alternatives to the Project that could attain most of its basic CEQA objectives while avoiding or reducing any of its significant environmental effects. PG&E has identified several alternatives in its PEA, four of which, in addition to the No Project Alternative, were carried forward for evaluation in the PEA. The four alternatives are:

- Moraga–Oakland X 3-Circuit Replacement with Moraga–Claremont Reconductoring and Park Boulevard/Lincoln Avenue Underground Alternative;
- Manzanita Drive-Colton Boulevard-Estates Drive Underground Alternative;
- Shepherd Canyon Road Underground Alternative; and
- Proposed Project with Campground Overhead Option Alternative.

These will be considered by the CPUC’s environmental review team and potentially carried forward for full analysis in the EIR. Other alternatives may be added to the analysis based on input received during the 30-day scoping period following issuance of this NOP, or by the EIR team to reduce or eliminate potentially significant environmental impacts identified during the EIR process.

### *Public Resources Code Section 21092.6(a)*

Per Public Resources Code Section 21092.6(a), if the Project site or site of any project alternative to be analyzed is a site listed on the “Cortese list” of hazardous waste sites, then this information must be included in the NOP.

According to PG&E, pursuant to Government Code Section 65962.5, there are 10 Cortese List sites located within 0.25 mile of the Project rights-of-way. No Superfund sites are located within 0.25 mile of the rebuilt project site.

## Issues that will not be Addressed in the EIR

Non-environmental issues, such as economic impacts and assessment of Project need, are outside the scope of CEQA. Likewise, they are not addressed in a PTC proceeding under General Order 131-D. Based on input received from interested parties and outside of CEQA, the Commission will determine the scope of the evidentiary proceeding.

The EIR will also not consider electric and magnetic fields (EMFs) that would be generated by the Project in the context of the CEQA analysis of potential environmental impacts, for two reasons: (1) there is no agreement among scientists that EMFs create a potential health risk; and (2) there are no defined or adopted CEQA standards for defining health risk from EMFs.

## Public Scoping Period for this Notice of Preparation

Information to be included in the EIR will be based in part on input and comments received during the scoping period. Decisionmakers, responsible and trustee agencies under CEQA, property owners, and members of the public will also have an opportunity to comment on the Draft EIR once it is issued.

The CPUC understands that resources significant to Native American tribes may be found in the Project area and that a Native American tribe or individual may be the only source for the presence of traditional cultural places or sites. Therefore, the CPUC would welcome additional information provided by any Tribe(s) related to any sacred or traditional cultural places, tribal cultural resources, tribal landscapes, or other cultural resources in the Project area or regarding any other environmental concerns. Please note that existing state laws protect the confidentiality of sensitive cultural resource information. If you would like to be included in tribal outreach, please contact the CPUC Project Manager.

Pursuant to CEQA, the scoping period will be 30 days following the release of this NOP. The scoping period for this Project begins on Tuesday, February 25, 2025, and closes at 5:00 p.m. on Thursday, March 27, 2025. Please include the name, organization (if applicable), mailing address, and email address of the contact person for all future notifications related to this process. Public comments will become part of the public record and will be published in a CPUC Scoping Report.

Please send your comments by email to:

**Tharon Wright, CPUC**  
**Moraga-Oakland X Project**  
**MOX@aspenerg.com**

## Scoping Meetings

In order for the public and regulatory agencies to have an opportunity to submit comments on the scope of the EIR for the Project, two online (Zoom) meetings will be held on March 13, 2025, during the NOP scoping period. Information about the meetings is included in the table below. To start, the CPUC will provide an overview of the Project and alternatives and present: (a) the CPUC's process for reviewing the application; (b) the environmental review process; and (c) details on how the public can become involved with each of these processes. Following the brief presentation, the CPUC will solicit verbal comments from the public.

Following this presentation, agencies and the public will have an opportunity to provide verbal comments to inform the scope of the environmental review. Written comments will be accepted throughout the NOP scoping period via email. A QR code to join either meeting is also provided.

<b>Virtual Scoping Meetings – Thursday March 13, 2025</b>	
<b>2:30 to 4:00 p.m.</b>	<b>5:30 to 7:00 p.m.</b>
Attend by Zoom: <a href="https://us02web.zoom.us/j/84175864740">https://us02web.zoom.us/j/84175864740</a>	Attend by Zoom: <a href="https://us02web.zoom.us/j/82814611227">https://us02web.zoom.us/j/82814611227</a>
Attend by Phone: (669) 444-9171 then enter Webinar ID: 841 7586 4740	Attend by Phone: (669) 900-6833 then enter Webinar ID: 828 1461 1227
