

SCOPING REPORT

PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project

Prepared for
California Public Utilities Commission

Submitted by



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- Attachment A. Notices
- Attachment B. Newspaper Advertisements
- Attachment C. Scoping Meeting Presentation
- Attachment D. Written Scoping Comments

1. INTRODUCTION

In its California Public Utilities Commission (CPUC) application (A.24-11-005), filed on November 15, 2024, Pacific Gas and Electric Company (PG&E) requests a Permit to Construct (PTC) for the Moraga-Oakland X 115 kV Transmission Line Rebuild Project (Project). The CPUC is the lead agency for the purposes of the California Environmental Quality Act (CEQA) review. Based on its review of the application and the Proponent's Environmental Assessment (PEA) submitted by PG&E, the CPUC is preparing an Environmental Impact Report (EIR), pursuant to CEQA, to evaluate potential effects of the Project.

On February 25, 2025, the CPUC issued a Notice of Preparation (NOP) of an EIR for the Project, which initiated agency consultation regarding the scope and content of information to be analyzed in the EIR (a process called "scoping") and invited early public input about potential environmental concerns (Pub. Res. Code § 21080.4(a); CEQA Guidelines §§ 15082(b), 15083). CEQA Guidelines Section 15083 provides that a "Lead Agency may...consult directly with any person...it believes will be concerned with the environmental effects of the project." Section 15083(a) states that scoping can be "helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." Scoping is an effective way to bring together and consider the concerns of affected State, regional, and local agencies, the project proponent, and other interested persons (CEQA Guidelines § 15083(b)).

This scoping report provides an overview and summary of the written and oral comments provided by agencies and individuals during the 30-day scoping period, which commenced February 25, 2025, and closed on March 27, 2025. The CPUC will use this scoping report to inform the preparation of a comprehensive EIR which will consider agency and community concerns. Pursuant to CEQA Guidelines Section 15082, all public comments within the scope of CEQA will be considered in the EIR process.

2. DESCRIPTION OF PROJECT

2.1. Project Summary

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 segments. 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 in the underground segment.

2.2. Project Location

The Project would be located within the city of Orinda, unincorporated Contra Costa County, and the cities of Oakland and Piedmont. 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 in Alameda County.

3. SCOPING PROCESS

3.1. Notice of Preparation

On February 25, 2025, the CPUC issued an NOP consistent with CEQA Guidelines Section 15082. The NOP described the proposed Project, stated the CPUC's intention to prepare an EIR, and requested comments from interested parties. In addition to mailing the NOP to agencies and Native American tribes, a postcard notice was mailed to landowners along the Project route. Attachment A, Notices, presents the notices distributed for the Project.

NOPs and scoping notices were mailed to responsible, trustee, and interested agencies, tribal governments, and property owners/residents as noted below.

- 38 NOPs were distributed via U.S. Mail.
- 100 NOPs were distributed via email.
- 7,134 postcard notices were distributed by U.S. Mail.

The NOP was also filed at the State Clearinghouse and posted at the County Clerks' offices for Contra Costa and Alameda Counties.

3.2. Newspaper Advertisements

The public scoping period for the EIR was advertised in two newspapers, the Contra Costa Times (February 27, 2025) and the Oakland Tribune (February 28, 2025). The advertisements provided a synopsis of the proposed Project, a map of the Project route, information about the scoping period and the scoping meetings, the email address for submitting written comments on the Project, and the address of the Project website. Attachment B, Newspaper Advertisements, includes copies of the advertisements published in the two newspapers.

3.3. Public Scoping Meetings (Virtual)

The CPUC held two virtual public scoping meetings using the Zoom Meetings software, where attendees could access either meeting through an internet connection or by telephone (see Table 1). The purpose of the scoping meetings was to present information about the MOX Project and the CPUC's decision making processes, and to hear public comments. A copy of the scoping meeting presentation is presented in Attachment C, Scoping Meeting Presentation. All oral comments made at the scoping meetings were recorded and summaries of the comments are included in Section 4.

Table 1. Public Scoping Meetings

	Virtual Meeting #1	Virtual Meeting #2
Day & Date	Thursday, March 13, 2025	Thursday, March 13, 2025
Time	Afternoon: 2:30 to 4:00 p.m.	Evening: 5:30 to 7:00 p.m.
How to Participate	Attend by Zoom: https://us02web.zoom.us/j/84175864740 Attend by Phone: (669) 444-9171 then enter Webinar ID: 841 7586 4740	Attend by Zoom: https://us02web.zoom.us/j/82814611227 Attend by Phone: (669) 900-6833 then enter Webinar ID: 828 1461 1227

3.4. Other Public Outreach

In addition to the public scoping meetings, the CPUC provided additional opportunities for the public and agencies to ask questions or comment on the Project. A Project information phone line, email address, and website were established. Information on these outreach options are described below.

- **Other Avenues for Submitting Comments.** The CPUC provided an email address (MOX@aspenerg.com) for electronic submittal of comments.
- **Project Website.** The CPUC established a Project-specific website to house all Project-related documents during the CEQA process. During the scoping period, the website presented details on the scoping meetings, and described how comments could be submitted. This website will be updated throughout the review of the MOX Project to serve as a resource of Project reports and updates.

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

- **Phone Line.** A Project phone line was set up to take questions from the public or requests for more information. This phone line (877-225-2127) provides another avenue for the public to obtain information about the Project. This phone line will continue to be used throughout the Project review process.
- **Project Contact List.** The CPUC has compiled a Project-specific mailing list with approximately 7,274 entries. This list includes responsible, trustee, and interested agencies, the State Clearinghouse, tribal governments, and property owners/residents.

The mailing list was updated based on contact information from the comment letters received during the scoping comment period. This mailing or distribution list will continue to be used throughout the environmental review process to distribute public notices and will be updated regularly to ensure all interested parties are notified of key project milestones.

3.5. Agency and Tribal Government Consultation

As part of scoping efforts, CPUC conducted early outreach to local agencies and officials and resource agencies to inform them about the upcoming Project and its scoping period. More than 11 agencies were contacted during this early outreach to identify issues of concern and to provide information on the Project. These agencies were also notified at the start of scoping and will continue to be noticed regarding Project review activities.

Additionally, the CPUC conducted consultation meetings with the following agencies. Input received related to significant environmental issues is briefly summarized below:

- **March 11, 2025: City of Oakland Department of Transportation (OakDOT)**
 - Note that Park Boulevard is concrete and would take longer to restore after construction.
 - Ensure communication with the community beforehand and notify residents of the circulation restriction in advance. Paper notices are recommended.
 - Concern with Park Boulevard, as it is a street of major importance.
 - Concern with the locations of the proposed cranes during construction. Ensure that cranes are non-obstructive during non-working hours.
 - Concern with obstructions during emergency response and maintaining circulation/access during the construction period. Ensure residents can get in and out of their neighborhoods and have at least a 12-foot-wide route.
 - Note that roads are 20 feet wide in some places and it would not be feasible to move the crane to allow access throughout the day in these areas.

- Avoid major disturbances.
- Concern with noise impacts, especially during nighttime construction and steel plates on roads that commonly result in noise complaints.

■ **March 11, 2025: Oakland Fire Department**

- In favor of undergrounding power lines.
- Ensure communication of the construction schedule, phasing, and any electrical service interruptions.
- No significant emergency access concerns occur along Park Boulevard.
- While the area of underground construction in Oakland is not in a designated Fire Hazard Severity Zone (FHSZ), Park Blvd is a path from a Very High FHSZ.
- Note that the highest fire risk and high winds occur from September to November and that the best construction window is April to June. However, there is no “good time” anymore due to changing wildfire behavior.
- Ensure notification of construction to jurisdictions and establishment of emergency alternative routes, especially in areas with proposed temporary roadway closures.
- Provide notification of construction timing to residents, as well as education about fire threats. Coordinate with PG&E on homeowner outreach.
- Consider impacts to Corpus Christi School and completing construction outside of the school year, in June and July.
- Hold community meetings prior to the start of construction.
- Notify the Oakland Fire Department and mark hydrants if out of service and temporary blockage cannot be avoided.
- Minimize residential cars parked along narrow roadways and/or only allow parking of construction vehicles.
- Emphasize that the Project need involves aging infrastructure, safety, and reliability.
- Be aware that roadways less than 20 feet wide present an emergency access issue.
- Provide the fire department with visuals of the proposed crane trucks to assess potential obstructions.
- Coordinate with the Oakland Department of Transportation on possible mitigation, such as parking signs during construction.

■ **March 20, 2025: City of Piedmont**

- Concern with hazardous materials during tower removal.
- Concern with construction traffic at the intersection of Estates Drive and Park Boulevard due to proximity to the Corpus Christi School. Provide extensive traffic control at this location, as Park Boulevard is a major roadway connecting State Route (SR) 13 and I-580.
- Pursue an Encroachment Permit from the City of Piedmont that would potentially include work hour restrictions to avoid impacts to school traffic.
- Note that there is landslide activity on Park Boulevard near Zion Lutheran School.
- Concern with potential issues associated with a tower in a residential lot. Provide information about what would happen to the communication facilities on that tower and generally about other tower removals in residential lots.
- Describe what is proposed to happen to the auxiliary parking lot adjacent to the Corpus Christi School.
- Concern with underground utilities that may need to be shut off during construction.

■ **April 7, 2025: East Bay Municipal Utility District (EBMUD)**

- Provide proposed tower heights for assessment and avoidance of additional vegetation maintenance.
- Four towers would require replacement on EBMUD watershed lands.
- Concern about California red-legged frog and Alameda whipsnake.

- Concern about impacts to nesting birds from helicopters. Ensure PG&E coordinates with EBMUD prior to construction and accesses the documented known nest locations.
- Consult with EBMUD if a helicopter landing zone is located on EBMUD lands to determine if it is an appropriate location.

■ April 10, 2025: City of Orinda

- Consider preexisting concerns regarding emergency/wildfire evacuation issues in the City of Orinda.
- Concern with the proximity of the helicopter staging area to the Wilder Ranch community.
- State and ensure that the Project would be constructed within the City's permitted construction hours.
- Concern with the use of Dolores Way for tower access during construction and operation.

The CPUC has notified tribal government representatives regarding the start of scoping for the MOX Project. More than 70 tribal representatives received notice of the start of scoping for this Project; the NOP was distributed to tribal representatives through U.S. Mail or via email depending on the available contact information. The CPUC will continue to coordinate with tribal governments and tribal representatives consistent with CEQA and Assembly Bill 52 requirements.

Agencies and Tribes contacted are listed in Table 2 and 3, respectively

Table 2. Agency Coordination

Agencies	
■ Alameda County Fire Department	■ East Bay Regional Park District
■ CAL FIRE Santa Clara Unit	■ Moraga-Orinda Fire District
■ City of Piedmont	■ Oakland Department of Transportation
■ City of Orinda	■ Oakland Fire Marshal
■ Contra Costa County Fire Protection District	■ Oakland Planning Department
■ East Bay Municipal Utility District	

Table 3. Tribal Coordination

Tribal Governments	
■ Amah Mutsun Tribal Band	■ Ione Band of Miwok Indians
■ Amah Mutsun Tribal Band of Mission San Juan Bautista	■ Jackson Rancheria Band of Miwuk Indians
■ Buena Vista Rancheria of Me-Wuk Indians	■ Muwekma Ohlone Tribe of the SF Bay Area
■ Calaveras Band of Mi-Wuk Indians	■ Nashville Enterprise Miwok-Maidu-Nishinam Tribe
■ Chicken Ranch Rancheria of Me-Wuk Indians	■ Northern Valley Yokut / Ohlone Tribe
■ Confederated Villages of Lisjan Nation	■ Pakan'yani Maidu of Strawberry Valley Rancheria
■ Costanoan Rumsen Carmel Tribe	■ The Ohlone Indian Tribe
■ Guidiville Rancheria of California	■ Wilton Rancheria
■ Indian Canyon Mutsun Band of Costanoan	■ Wuksachi Indian Tribe/Eshom Valley Band

4. SCOPING COMMENTS

A total of 59 written comment letters were submitted by email during the scoping period. A form letter was submitted by several community members and is included in the summary below. A total of 17 oral comments were taken during the virtual scoping meetings.

Attachment D, Written Scoping Comments, includes a table listing all commenters, as well as copies of all written comment letters in their original format. A summary of the key comments, from both oral and written comments, is included below.

4.1. Key Issues Raised during the Public Comment Period

Wildfire Risk

- Concern with wildfire risk associated with the Project, specifically regarding proposed aboveground lines in areas that are heavily wooded, densely populated, experience strong canyon winds, or have limited ingress and egress routes.
- Identify potential impacts from overhead lines, mitigation for wildfire, and prevention reduction measures.
- Consult with the Oakland Fire Department and discuss PG&E's Alternatives B and C, which underground the transmission lines in Diamond Canyon and Shepherd Canyon, both areas with high fire risk.
- Consider the recent wildfires in Los Angeles, California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity Zone map, and Executive Order N-18-25.
- Consider removal of the towers, especially those bordering residential areas, as it could provide a fire break that would allow for a fire road to be maintained above underground lines and remove the risk of fires associated with aboveground lines.
- Note that Orinda-Moraga was one of the top three areas identified as being at risk of experiencing the next Pacific Palisades-style disaster.
- Concern that the proposed towers would only be built to withstand 85 miles per hour (mph) winds while gusts over 80 mph have been documented in the area recently.
- Concern that PG&E is not making an effort to underground lines in high fire danger areas.
- Concern that the Montclair area only has three roads serving 10,000 residents and if a fire were to occur and result in a road blockage, it would be catastrophic.
- Concern that "hardening" utility poles does not mitigate wildfire risk given the high tree-fall-in risk, as noted in PG&E's Wildfire Mitigation Plan.
- Correct the CPUC's 10-year undergrounding plan to include significant portions of the Oakland Hills that have been omitted despite the 1991 wildfire and the passage of SB 884.
- Concern that Shepherd Canyon is a terrible area for the Project, as this is a high fire danger area with dense residential development and vegetation, heavy infrastructure, and difficult egress. This canyon is also a wind funnel that created the Oakland Hills fire in 1993.
- Request for explanation why the Oakland Fire Department had not been contacted.
- Maintaining high-voltage transmission lines overhead through the densely populated Very High FHSZ in Montclair poses an unacceptable risk.

- Concern that PG&E's PEA is inadequate as it fails to evaluate the consequences of wildfire risk associated with the proposed Project. The Wildfire Transmission Risk Model (WTRM) model used by PG&E does not reflect future climate change impacts on ignition risk. Request to consider the Project's impacts in the context of the environment that would exist in the coming decades.
- Concern that PG&E's PEA does not consider the potential environmental impacts from a fire in the Oakland Hills or estimate the lives and properties at risk from overhead power lines causing a fire.
- Consider and quantify the impacts of wildfire in the proposed overhead power line zones.
- Consider how fires associated with overhead power lines exacerbate the ongoing homeowners' insurance crisis, as outlined in Senate Bill 884.
- Concern that the small portion of underground lines is proposed as more of a PR token than a way to address the wildfire risks of aboveground lines.

Noise

- Concern that construction noise could disturb the residents who live near the Moraga Substation.
- Outline noise mitigation strategies the Project would employ to ensure Orinda residents would not be adversely impacted.
- Analyze the proposed use of helicopters, their potential to generate noise at a greater distance, and identify measures to reduce this impact.
- Confirm that the Project would comply with the City of Orinda Noise Control Ordinance Chapter 17.39, which states that construction of this magnitude should be limited to 8 a.m. to 6 p.m. on weekdays and from 10 a.m. to 5 p.m. on Saturday, not occur on Sunday, and not utilize heavy construction equipment on weekends.

Aesthetics

- Concern that the Project would result in significant and unmitigated aesthetic impacts related to height increase for some of the proposed structures and not undergrounding all transmission lines.
- Concern that PG&E's Environmental Analysis (EA) conclusion of less than significant aesthetic impacts is unsupported, because figures included in the EA illustrate both the impacts of overhead lines and the aesthetic improvements associated with underground lines. PG&E has also acknowledged that undergrounding would eliminate aesthetic impacts of aboveground structures.
- Consider the aesthetic impacts of rebuilding the outdated towers and continuing vegetation management.

Recreation

- Notify and coordinate with Park District staff prior to any work within Sibley Volcanic Regional Preserve (Sibley). Avoid crossing bridges with narrow turning areas within Sibley by using Gudde Ridge Trail and Arroyo Willow Trail. If access from Edgewood Road is not feasible, PG&E would access from Sibley's Eastport Staging Area off Pinehurst Road and use the first bridge crossing.
- Confirm that the Park District's future campground parking lot (50'x50') would be sufficient for helicopter landing and staging. Apply for a Temporary Park Access Permit with the Park District for a potential helicopter landing and staging area within the lot.
- Address needed road improvements along Gudde Ridge Trail north of the McCosker Loop Trail junction and along the service road leading up to transmission towers EN9 and ES10, and coordinate with Park District Park Operations staff on these improvements.

- Coordinate the construction timeline with Park District staff to ensure it does not conflict with Fiddleneck Campground construction or operations, as the transmission lines proposed to be replaced go over this area.
- Provide Project notices of future referrals, environmental review, and public hearings to the Park District.

Transportation and Traffic

- Concern that the Moraga Substation is only accessible by one, two-lane road that serves as the primary entrance and exit for the Lost Valley Drive neighborhood.
- Identify strategies to minimize impacts on traffic, such as street closures and hazardous conditions for pedestrians and vehicles.
- Identify what mitigation strategies would be in place in the event of an emergency to preserve access for emergency services and evacuation routes.

Utilities and Service Systems

- Coordinate construction activities with the East Bay Municipal Utility District (EBMUD) to maintain the integrity of water distribution and transmission pipelines that exist throughout the Project site. Provide 18 months advance notification for street improvement projects to allow for reasonable time to perform water pipeline relocations. See the provided typical schedule for design and relocation of approximately 1,500 feet of 8-inch water pipeline.
- EBMUD will not provide design or services until soil and groundwater quality data and associated remediation plans have been reviewed and will not start underground work until any contaminated soil and groundwater are remediated to EBMUD standards and documentation of the effectiveness of the remediation has been received and reviewed.
- EBMUD's water distribution pipelines and valves must always be accessible to EBMUD staff to maintain high-quality domestic water and fire flow services and mitigation for pipeline outages.
- Note that PG&E is responsible for protecting in-place pipeline valves and ensuring they are accessible during and after construction. Recommend reviewing EBMUD as-built drawings and identifying potential utility conflicts between the Project and existing EBMUD pipelines. See attached EBMUD guidelines for requesting pipeline as-built drawings.
- Review EBMUD's Design Standards and Specifications for mains 20-inches and smaller when evaluating the need and method for relocating or adjusting EBMUD infrastructure.
- Share locations of utility conflicts with EBMUD pipeline valve covers as well as existing and final pavement grade elevations.
- EBMUD supports PG&E in street improvements by relocating water meters to meet project goals and design standards and mitigate utility conflict. Once the new meter location is ready, PG&E must relocate the customer's private water service line to the new meter location.
- Ensure that there are no conflicts with existing EBMUD fire hydrants, new curb ramps, or sidewalks. Ensure that fire hydrants are located 5 feet from the edge of curb ramps and 20 to 24 inches from the face of street curbs. Note that hydrant relocations require the County to submit a Hydrant Relocation Application.
- Invite EBMUD's Central Area Service Center Superintendent, Central Area Assistant Superintendent, and East Area Assistant Superintendent to all pre-construction meetings.

Cultural and Tribal Cultural Resources

- Must provide Notice of Completion of an application/decision to undertake the project to a tribal representative of California Native American tribes that have requested notice.
- Must begin consultation process within 30 days of receiving a request for consultation from a California Native American tribe.
- Require discussion of mandatory topics of consultation if requested by a tribe.
- Recommend discussion of discretionary topics of consultation.
- Require confidentiality of information submitted by a tribe during the environmental review process.
- Require discussion of impacts to Tribal Cultural Resources in the environmental document.
- Conclude consultation with a tribe when parties agree to measures to mitigate or avoid a significant effect, or a party acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.
- Recommend mitigation measures agreed upon in consultation.
- Require feasible mitigation pursuant to Public Resources Code section 21084.3(b).
- Recommend mitigation measures that may be considered to avoid or minimize significant adverse impacts to Tribal Cultural Resources.
- Require meeting prerequisites for certifying an EIR or adopting a Mitigated Negative Declaration/ Negative Declaration with a significant impact on a Tribal Cultural Resource.
- Require consulting with the appropriate tribes identified by the NAHC by requesting a Tribal Consultation List.
- Conclude Senate Bill 18 tribal consultation when parties come to a mutual agreement concerning mitigation measures or the local government or tribe concludes that mutual agreement cannot be reached.
- Recommend contacting the appropriate regional California Historical Research Information System Center for an archaeological records search.
- Recommend preparation of a professional report detailing findings and recommendations of the research search and field survey if an archaeological inventory survey is required.
- Contact the Native American Heritage Commission (NAHC) for a Sacred Lands File search and Native American Tribal Consultation List.

Biological Resources

- Incorporate buffer zones to limit Project activities to areas outside of and away from sensitive habitats, that at a minimum for smaller streams include a 50-foot riparian buffer and larger buffers for mainstem streams and rivers. Consult with CDFW if needed to determine appropriate buffers to reduce impacts to sensitive species and critical habitat to less-than-significant levels.
- Establish a complete inventory of special-status species with the potential to occur within the Project area. Require detailed habitat assessments by a qualified biologist along the Project area to determine the presence of suitable habitat for individual plant and wildlife species and perform protocol-level surveys if habitat exists to determine the presence or absence of special-status species. Provide appropriate mitigation measures to ensure impacts to these species are reduced to less-than-significant levels if they are documented within the Project area. Apply for a California Endangered Species Act (CESA)

take authorization under an Incidental Take Permit (ITP) if impacts to CESA-listed species cannot be avoided.

- Recommend the Draft EIR include all effective and feasible design features and measures to avoid or reduce collision and electrocution risks on volant (birds and bats) species. Ensure the Project is consistent with the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006.
- Define the term and seasonal work window of Project activities, as the timeframe will aid in assessing impacts on species in the Project area and allow for the development of appropriate compensatory mitigation.
- Include mapping of the geology and hydrology of the Project area as well as mapping and description of any drilling activities including detailed locations and depths of underground lines that may pass under sensitive habitats.
- Consider if dewatering activities associated with drilling may be necessary.
- Obtain a Lake and Streambed Alteration Agreement for any drilling activities that may affect the bed, bank, or channel of a lake or stream.
- Identify the amount of required vegetation removal, and whether this would include tree removal and other vegetation impacts. The City of Orinda may not support the removal of trees, particularly trees protected under the Orinda Municipal Code without proper analysis permits and/or restitution.
- Analyze impacts on Sausal Creek, which has a native population of Rainbow Trout and other aquatic species, from erosion and sedimentation associated with the transmission line and maintenance in Shepherd Canyon.

Geology and Soils

- Concern that previous tree removal and maintenance by PG&E crews would cause erosion and landslides; therefore, proposed undergrounding should happen as soon as possible.
- Concern with the steep slopes in Shepherd Canyon and associated high erosion potential that is worsened by the transmission line right of way and could be exacerbated by the Project. Include applicable erosion control measures.

4.1.1. Alternatives

- Consider moving all or more of the overhead lines underground due to the high fire risk in the Project area between the Moraga Substation and Park Boulevard.
- Consider wildfire risk when deciding which power lines to underground.
- Consider undergrounding all high voltage power lines in the Oakland and Berkeley area, as this area is very densely populated, and the 1991 fires and recent Palisades fire demonstrate the need to underground lines in high fire risk areas.
- Consider undergrounding all electrical lines in the Montclair Hills area.
- Amend the proposal to either underground or relocate the transmission line in Montclair to a less wooded and densely populated area.
- Require new underground 115 kV lines from approximately Estates Drive to Skyline Boulevard instead of rebuilding that segment aboveground.
- Prefer higher costs if it would ensure that more power lines would be undergrounded and wildfire risk would be reduced.

- Adopt PG&E's Alternative B or C, which underground the transmission lines throughout Diamond Canyon and Shepherd Canyon, both areas of high fire risk.
- Adopt PG&E's Alternative B, as it provides more undergrounding and greater public safety compared to the current plan, which does not contain enough undergrounding to adequately protect Oakland.
- Provide additional information and explanation for rejecting PG&E's Alternatives B and C.
- Consider undergrounding the lines now when they are already being worked on to save time and money as well as minimize fire hazard, as they will eventually need to be moved underground.
- Mandate undergrounding of electrical lines for all projects in "very high" fire danger severity zones or near significant nature preserves, parks, and residential areas, as a standard practice to create safer, more resilient energy infrastructure that prevents future tragedies and aligns with SB 884. Past and recent fires have illustrated the risk of overhead lines and how they exacerbate these risks as well as the homeowners' insurance crisis.
- Undergrounding power lines, despite higher upfront costs, offers long-term benefits like reducing wildfire risks, improving grid reliability, and enhancing public safety.
- Implement new infrastructure solutions that prioritize resilience and sustainability to mitigate wildfire risks due to the increasing frequency and intensity of wildfires in California.
- PG&E's Wildfire Mitigation Plan acknowledges that undergrounding power lines significantly reduces wildfire ignition risk and has successfully implemented it in other high-risk areas.
- Consider that underground lines would mitigate PG&E's justification for rate increases as a result of tree pruning costs and that reducing vegetation management would provide financial, environmental, and aesthetic benefits and ensure ratepayers' funds are used responsibly.
- Address the feasibility of undergrounding the section of powerlines that span Orinda.
- Describe the differences and reasoning for underground lines in Oakland and overhead lines in Orinda.
- EBRPD stated preference for the proposed Project because it would have fewer impacts to woodland habitat in Sibley and Huckleberry Botanic Regional Preserve compared to PG&E's Alternative E (Overhead Campground Option), which would involve tree removal and additional associated impacts outside of PG&E's existing right-of-way.
- In its PEA, PG&E did not meaningfully consider underground alternatives or explain why they were rejected within Park Boulevard between SR-13 and Estates Drive, within Mountain Boulevard from S-13 to Shepherd Canyon Road, and within Shepherd Canyon Road from Mountain Boulevard to Saroni Drive.
- Mandate a full environmental scoping and evaluation of complete undergrounding and/or removal of overhead transmission lines in this high-risk, heavily forested, and densely populated area, including the Montclair neighborhood.
- Provide an explanation for why the transmission lines in the city of Piedmont, a lower fire risk area, would be underground and not the areas with the greatest fire risk.
- Reconsider the proposed locations of underground lines, as Piedmont is not as vulnerable as other areas that have more homes at risk of wildfire and high winds.
- Concern that PG&E discounted the underground alternative without fully evaluating the feasibility under CEQA Section 15364 with quantitative assessment or objective standards. Ensure assessment of economic feasibility for the underground alternative is made in comparison to the full economic

impacts of not undergrounding, which would include PG&E's exposure to liability for damages from wildfire and PG&E's transfer of economic harm to the surrounding community.

- Replace current infrastructure with new technology, because this is a generational project addressing 100-year-old infrastructure. Using the same type of infrastructure would expose this area to climate change and increased wildfire risk that would result in loss of life and homes. This is especially important due to the increase in dense vegetation and residential development as well as the high fire risk and the Altadena Fire that was likely caused by a transmission tower.
- Prioritize removing the line to permanently reduce wildfire risk and hardening other lines in lower-risk zones or undergrounding it.
- Consider other routes for this transmission line in lower-risk areas if they exist, because the Project area, specifically Shepherd Canyon and Oakland, are high fire danger areas.
- Concern that the line is proposed to remain intact in the highest wildfire area after PG&E stated in public notifications that undergrounding saves money because of the reduction in required vegetation management. Concern that the explanation provided by a PG&E spokesperson which stated that this was due to easements and land rights was unsatisfactory, because it was based on convenience and did not consider the potential risk associated with loss of homes and lives associated with this infrastructure.
- Consider that this is an opportunity to take big steps and do something transformational for future generations rather than taking the cheaper route that would expose residents to high fire risk.
- Supports undergrounding the entire lines, as aboveground lines increase the risk of brownouts, which are reductions or restrictions on electrical power availability.
- Concern that the reason for undergrounding along Park Boulevard is purely based on cost.
- Recommend that everyone look at the six major transmission lines serving Oakland and other areas in the East Bay as they have substantial clearance around them, which differs from the lines in the Shepherd Canyon area that are surrounded by houses and vegetation.
- The Montclair neighborhood has already seen the devastating effects of the Tunnel Fire in 1991, including the loss of homes and lives as well as many injuries. This very high fire danger severity zone calls for mandatory undergrounding of all electrical lines. If onsite inspections had taken place, undergrounding the entire Project would have been proposed.
- Include an analysis of all the costs associated with not undergrounding all lines to show that ROI of earlier undergrounding is the cost-effective option.
- Opposes the current proposal that would replace century-old transmission towers with new overhead towers through the Montclair neighborhood.
- Describe the alternative options listed on the last page of the scoping meeting presentation.
- Develop a proposal consistent with PG&E's Alternative B.
- Supports PG&E's Alternative B as a minimum step.
- PG&E's PEA does not adequately quantify the reduction in environmental impact from a lower-risk alternative (Alternative B).
- PG&E's PEA does not adequately analyze the rejection of PG&E's Alternative B due to economic reasons.
- Calculate and compare reductions in wildfire risk associated with PG&E's Alternative B and other fully underground alternatives to the risks of the proposed Project.

- Suggestion that PG&E should make the infrastructure investment in an area that hosts one of their largest substations and is located in the highest wildfire risk zone.
- Concern that individual homeowners have to assume responsibility for climate change, especially when they are already paying for fire protection compliance and increased PG&E rates and insurance payments. Concern that more accountability needs to be placed on the utility that has been the cause of these fires.
- Explain why the infrastructure in Shepherd Canyon would be kept in place, as it is very old and needs to be removed due to the changing environment and risk of exposed lines, as demonstrated by the recent Los Angeles fires.
- Explain whether proposed improvements for the two towers on Sayre Drive could be moved to avoid the adjacent house and construction disruption.

4.1.2. Notice and Public Participation

- Residents in the Montclair Hills area near the PG&E lines and infrastructure did not receive notification that PG&E said was provided.
- Request that PG&E do a more thorough job of outreach to individual property owners that would be affected by the Project before the Project progresses more.
- Provide the date of the next public discussion opportunity.
- Concern that PG&E did not meaningfully engage with residents in the Montclair area, which undermines public trust and raises concerns about procedural fairness.
- Investigate whether PG&E met its public notification obligations in spring 2024.
- Hold public hearings in Montclair to ensure community input is received.

4.1.3. Project Need

- Support for the Project, PG&E making the proposed improvements, and hardening its infrastructure.
- Support for responsible maintenance and repair of aging PG&E infrastructure to improve system reliability and reduce hazards.
- Concern that the proposed Project contradicts PG&E's previous meeting that described the relocation of the lines in Shepherd Canyon. Explain what happened to the original plan.

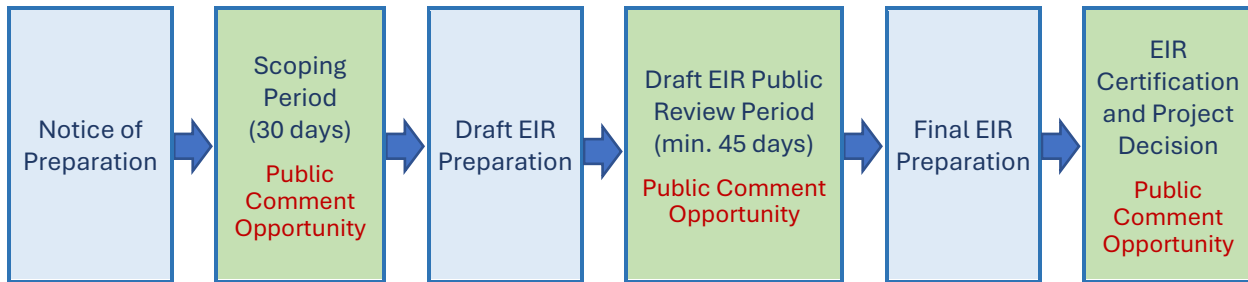
4.1.4. Project Description

- Provide more information about the temporary staging areas proposed for construction, and determine which locations are being considered for staging areas in Orinda, particularly those that may be used for helicopter landing zones (HLZs).
- Provide detailed information about proposed improvements for the two towers on Sayre Drive. Explain whether they would be fully replaced and whether they would be on the same footprint. Provide the estimated duration of construction equipment on the property, the proposed heights, and the quantity of wires.
- Explain how residential landscaping would be avoided during construction.
- Clarify the Project schedule.
- Describe what happens to the land after the lines are moved underground.

5. NEXT STEPS IN EIR PROCESS

While scoping is the initial step in the environmental review process, additional opportunities to comment on the EIR will be provided. Consistent with CEQA, CPUC will provide for additional public input when the Draft EIR is released for public comment and at the decision hearing before the CPUC. Figure 1, EIR Process, provides information on where in the EIR process the public has an opportunity for public comment.

Figure 1. EIR Process



5.1. EIR Events and Documents

Table 4. EIR Events and Documents (as of April 2025)

Document/Event	Purpose	Preliminary Schedule
Draft EIR		
Release of Draft EIR	Presents impacts and mitigation for the proposed Project	3rd Quarter 2025
Public Review Period	45-day public review period of the Draft EIR	3rd Quarter 2025
Draft EIR Public Hearing	Allows for public comment on the draft document	August/September 2025
Final EIR		
Release of Final EIR	Presents revisions to the Draft EIR and responses to comments on the Draft EIR raising significant environmental issues	December 2025
Notice of Determination	CPUC certifies EIR and issues a Determination on the proposed Project	February 2026

Attachment A

NOTICES

2025-00072

FILED

March 13, 2025

KRISTIN B. CONNELLY
CLERK-RECORDER

By 

J. Lara
Deputy Clerk



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

Kristin B. Connelly
Contra Costa
Clerk-Recorder
555 Escobar Street
Martinez, CA 94553
(925) 335-7900

Public

Finalization No.: 202500024120

Cashier: jlara

Register: CLERKPC23

Date/Time: 03/13/2025 02:37 PM

Description	Fee
NOTICE OF PREPARATION	
Filing Time:	02:37 PM
Filing Total:	No Fee
Filing Fee:	No Fee

Total Amount Due:

Total Paid

Amount Due: \$0.00

THANK YOU
PLEASE KEEP FOR REFERENCE



PG&E's Moraga-Oakland X 115 kV Transmission Line Rebuild Project

Notice of Preparation of EIR and Public Scoping Meeting

YOU ARE INVITED

The California Public Utilities Commission (CPUC) invites you to learn about and comment on the Moraga-Oakland X Rebuild Project, proposed by Pacific Gas and Electric Company (PG&E).

Two virtual public scoping meetings will be held to provide information about the CPUC's review process and accept comments on the scope of an upcoming Environmental Impact Report (EIR) to be prepared by the CPUC.

Comments can be submitted verbally during the scoping meeting, or via email during the scoping comment period, which ends March 27, 2025. See information on back.

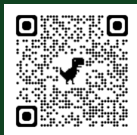
**Thursday, March 13, 2025
2:30 to 4:00 p.m.**

Meeting Information

**Thursday, March 13, 2025
5:30 to 7:00 p.m.**

Attend by Zoom:

<https://us02web.zoom.us/j/84175864740>

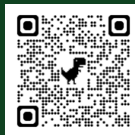


Attend by Phone:

(669) 444-9171 then enter
Webinar ID: **841 7586 4740**

Attend by Zoom:

<https://us02web.zoom.us/j/82814611227>



Attend by Phone:

(669) 900-6833 then enter
Webinar ID: **828 1461 1227**

To submit written comments via email:

**Address to: Tharon Wright, CPUC
Subject line: Moraga-Oakland X Project**

MOX@aspeneg.com



For more information:

**[https://ia.cpuc.ca.gov/environment/info/
aspenn/moraga-oakland/moraga-oakland.htm](https://ia.cpuc.ca.gov/environment/info/aspenn/moraga-oakland/moraga-oakland.htm)**

California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Ste. 967
San Francisco, CA 94104-2920



From: PG&E Moraga-Oakland X 115 kV Rebuild Project
Sent: Tuesday, February 25, 2025 4:23 PM
To: tharon.wright@cpuc.ca.gov
Subject: PG&E Moraga-Oakland X 115 kV Rebuild Project - Notice of Preparation of a Draft EIR (SCH #2025-02-0944)

*****This is a duplicate notification with the Notice of Preparation file attached*****

Dear Interested Parties,

The California Public Utilities Commission (CPUC) has published the ***Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for Pacific Gas and Electric Company's (PG&E's) Moraga-Oakland X (MOX) 115 Kilovolt (kV) Rebuild Project*** (Project). The attached NOP includes a description of the proposed Project, environmental effects that have been identified thus far for consideration in the EIR, and details on the 30-day scoping period. **Written scoping comments must be submitted via email by March 27, 2025, for inclusion in the Draft EIR to MOX@aspenerg.com.**

In addition, the CPUC will hold two virtual project scoping meetings to obtain input from agencies and the public on the scope and content of the EIR at:

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

Project Background: The MOX Project would involve proposed upgrades to approximately 5-miles of four overhead 115 kV power lines between Moraga and Oakland X substations in the City of Orinda, unincorporated areas of Contra Costa County, and the cities of Oakland and Piedmont within Alameda County. The two existing parallel double-circuit power lines are located within existing PG&E land rights, and the Project would rebuild the four overhead lines into four hybrid lines, with both overhead (~4 miles) and underground (~1 mile) segments.

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 line. Double-circuit transition structures would be used to connect the underground portion to existing overhead line terminals at Oakland X Substation. Additionally, the rebuild would include the installation of optical ground wire on aboveground structures with a communication cable continuing within the underground portion.

The CPUC is the lead agency responsible for environmental review of the project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq.

Document Availability: For electronic access to the NOP (in addition to the attached document PDF), please check the project website at the link below.

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

Thank you for your interest in the project.

Sincerely,
The MOX EIR Team

Attachment B

NEWSPAPER ADVERTISEMENTS

3866329

Aspen Environmental Group
Connor King
5020 Chesebro St., #200
Agoura Hills, CA 91301-2285

PROOF OF PUBLICATION

FILE NO. MOX Scoping Announcement

Contra Costa Times

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Contra Costa Times, a newspaper published in the English language in the City of Walnut Creek, County of Contra Costa, State of California.

I declare that the Contra Costa Times is a newspaper of general circulation as defined by the laws of the State of California as determined by court decree dated October 22, 1934, Case Number 19764. Said decree states that the Contra Costa Times is adjudged to be a newspaper of general circulation for the City of Walnut Creek, County of Contra Costa and State of California. Said order has not been revoked.

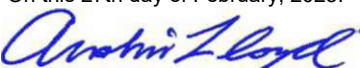
I declare that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

February 27, 2025

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.

On this 27th day of February, 2025.



Signature

**Notice of Public Scoping Meetings for Moraga-Oakland X Project
Proposed by Pacific Gas & Electric Company
CPUC Application No. A.24-11-005**

The California Public Utilities Commission (CPUC) is preparing an Environmental Impact Report (EIR) for the Moraga-Oakland X (MOX) Project proposed by Pacific Gas & Electric Company (PG&E). The CPUC is lead agency under the California Environmental Quality Act (CEQA) and will hold two virtual public scoping meetings during a 30-day public comment period to obtain input from agencies and the public on the scope and content of the EIR.

Virtual Scoping Meetings – Thursday March 13, 2025

2:30 to 4:00 p.m.

Attend by Zoom:

<https://us02web.zoom.us/j/84175864740>

Attend by Phone:

(669) 444-9171 then enter

Webinar ID: 841 7586 4740

5:30 to 7:00 p.m.

Attend by Zoom:

<https://us02web.zoom.us/j/82814611227>

Attend by Phone:

(669) 900-6833 then enter

Webinar ID: 828 1461 1227

The CPUC's CEQA scoping comment period ends on March 27, 2025. During the comment period you may submit comments on the scope and content of the document verbally at the virtual public meetings noted above or by electronic mail to MOX@aspenerg.com.

Project Description

The MOX 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 will be rebuilt as hybrid power lines, meaning the two double-circuit lines between the two substations will have both overhead and underground portions. Existing towers, poles and conductors will be replaced either with overhead rebuild or underground components, and minor modifications will occur within the existing substations. Some recently replaced power line structures will be reused or reused with some modification. Single-circuit transition structures will support the connection between the overhead and underground portions of each circuit. Double-circuit transition structures will be used to connect the underground portion to existing overhead circuit terminals at Oakland X Substation. Additionally, the rebuild will 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.

ADDITIONAL INFORMATION

Information regarding the project's environmental review process, project documents, and contact information, can be found on the CPUC's project website at:

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

For more information e-mail the project team at MOX@aspenerg.com.

CCT 0006881773: Feb. 27, 2025

3866329

Aspen Environmental Group
Connor King
5020 Chesebro St., #200
Agoura Hills, CA 91301-2285

PROOF OF PUBLICATION

Moraga-Oakland X Scoping Announcement

Oakland Tribune

The Oakland Tribune

I am a citizen of the United States; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the Legal Advertising Clerk of the printer and publisher of The Oakland Tribune, a newspaper published in the English language in the City of Oakland, County of Alameda, State of California.

I declare that The Oakland Tribune is a newspaper of general circulation as defined by the laws of the State of California as determined by this court's order, dated December 6, 1951, in the action entitled In the Matter of the Ascertainment and Establishment of the Standing of The Oakland Tribune as a Newspaper of General Circulation, Case Number 237798. Said order states that "The Oakland Tribune is a newspaper of general circulation within the City of Oakland, and the County of Alameda, and the State of California, within the meaning and intent of Chapter 1, Division 7, Title 1 [§§ 6000 et seq.], of the Government Code of the State of California." Said order has not been revoked, vacated, or set aside.

I declare that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

February 28, 2025

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Rio Vista, California.

Dated: February 28, 2025



Public Notice Advertising Clerk

**Notice of Public Scoping Meetings for Moraga-Oakland X Project
Proposed by Pacific Gas & Electric Company
CPUC Application No. A24-11-005**

The California Public Utilities Commission (CPUC) is preparing an Environmental Impact Report (EIR) for the Moraga-Oakland X (MOX) Project proposed by Pacific Gas & Electric Company (PG&E). The CPUC is lead agency under the California Environmental Quality Act (CEQA) and will hold two virtual public scoping meetings during a 30-day public comment period to obtain input from agencies and the public on the scope and content of the EIR.

Virtual Scoping Meetings – Thursday March 13, 2025

2:30 to 4:00 p.m.

Attend by Zoom:

<https://us02web.zoom.us/j/84175864740>

Attend by Phone:

(669) 444-9171 then enter

Webinar ID: 841 7586 4740

5:30 to 7:00 p.m.

Attend by Zoom:

<https://us02web.zoom.us/j/82814611227>

Attend by Phone:

(669) 900-6833 then enter

Webinar ID: 828 1461 1227

The CPUC's CEQA scoping comment period ends on March 27, 2025. During the comment period you may submit comments on the scope and content of the document verbally at the virtual public meetings noted above or by electronic mail to MOX@aspenerg.com.

Project Description

The MOX 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 will be rebuilt as hybrid power lines, meaning the two double-circuit lines between the two substations will have both overhead and underground portions. Existing towers, poles and conductors will be replaced either with overhead rebuild or underground components, and minor modifications will occur within the existing substations. Some recently replaced power line structures will be reused or reused with some modification. Single-circuit transition structures will support the connection between the overhead and underground portions of each circuit. Double-circuit transition structures will be used to connect the underground portion to existing overhead circuit terminals at Oakland X Substation. Additionally, the rebuild will 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.

ADDITIONAL INFORMATION

Information regarding the project's environmental review process, project documents, and contact information, can be found on the CPUC's project website at:

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

For more information e-mail the project team at MOX@aspenerg.com.

OT 0006881771: Feb. 28, 2025

Attachment C

SCOPING MEETING PRESENTATION

CPUC A.24-11-005 Proceeding

PG&E's Moraga-Oakland X (MOX) 115 kV Rebuild Project

Webpage: [Pacific Gas and Electric Company's Moraga-Oakland X 115 kV Rebuild Project](#)

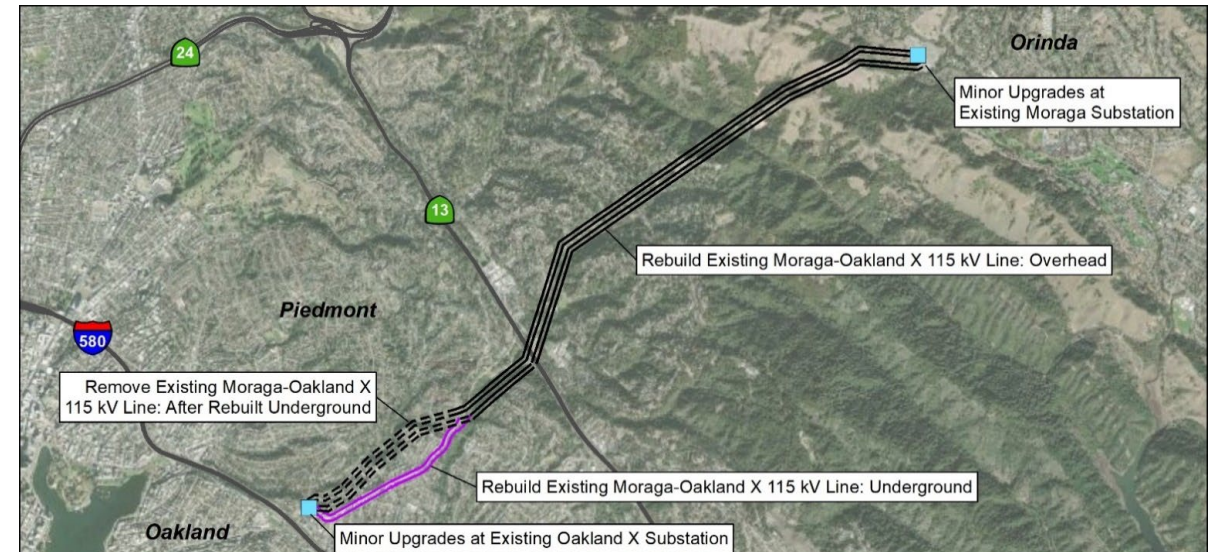
CEQA Scoping Meeting

California Public Utilities Commission,
Energy Division



California Public
Utilities Commission

March 13, 2025



*Please note that this meeting will be recorded

Meeting Guidelines

- All attendees will be muted during the presentation.
- Please note that the **CHAT** box will be monitored, but questions will not be answered live. If you have a question, please reach out to the CPUC via email at: MOX@aspeneg.com.
- You may submit a written scoping comment via **CHAT** box if you wish, but email is preferred.
- If you would like to make an **oral scoping comment**, please wait until the end of the presentation. When we ask for scoping comments, use the **RAISE HAND** feature and we will call on you to speak.
- **Note:** This meeting is being recorded.

Scoping Meeting Agenda

- Introductions
- Purpose of the Meeting
- Application and Permitting Process
- Environmental Review Process (CEQA)
- Project Overview
- Scoping: Environmental Impacts & Alternatives
- Public Comments
- Next Steps



Introductions

State Lead Agency (CEQA):

- California Public Utilities Commission (CPUC)
 - Tharon Wright, CPUC Project Manager

CEQA Consultant:

- Aspen Environmental Group
 - Hedy Koczwar, Aspen Project Manager
 - Grace Weeks, Aspen Deputy Project Manager

Project Applicant:

- Pacific Gas and Electric Company (PG&E)



Purpose of this Meeting



To inform the public, agencies, and interested parties about the project and the environmental review process.

To receive input to inform the scope and content of the environmental review and identify issues of concern.

Your ideas are welcome and invited!

What is Scoping?

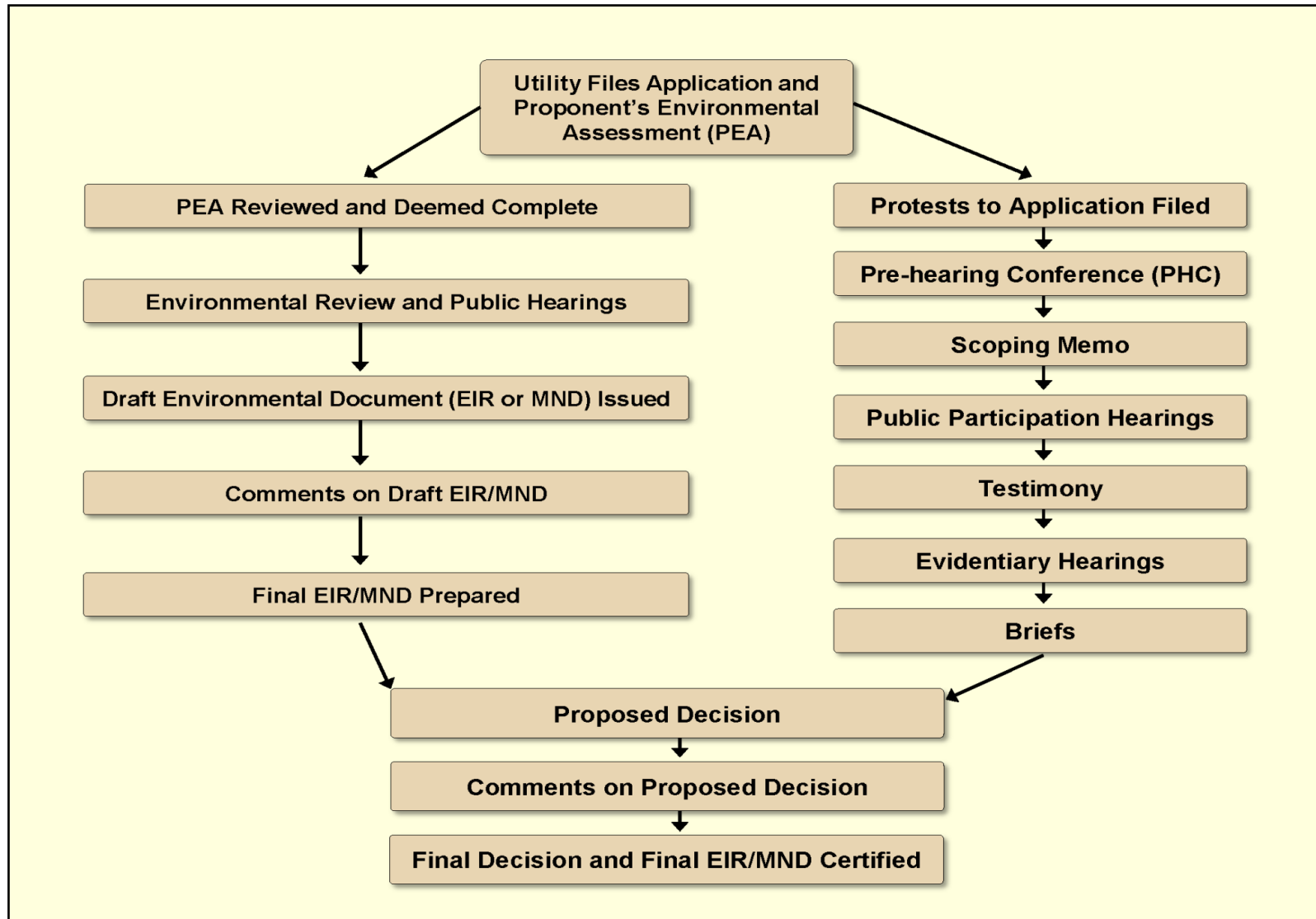
- Scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation.
- CPUC is requesting comments to inform the scope and content of the EIR and help identify the project actions, alternatives, environmental effects, and mitigation measures to be analyzed.

Role of California Public Utilities Commission

The CPUC is conducting two parallel review processes for this PG&E Application for a Permit to Construct (PTC):

1. **General Proceeding:** Application # A.24-11-005
 - Assigned Commissioner *Karen Douglas*
 - Administrative Law Judge *David van Dyken*
 - See flow chart on next slide
2. **Environmental Review:** State Clearinghouse #2025-02-0944
 - CPUC is Lead Agency for CEQA process
 - Application is typically deemed complete before Scoping begins
 - Schedule includes ongoing consultation with Native American Tribes

CPUC Process (Generalized)



CEQA Overview

- Purpose of the California Environmental Quality Act (CEQA) is to:
 - Inform decision makers and the public about the potential significant environmental effects of a proposed project.
 - Identify ways that environmental damage can be avoided or significantly reduced.
 - Prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures.
 - Disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved.
- Focus on physical impacts to the environment.

CEQA EIR Process



MOX Project Location

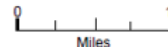
- Alameda County
 - Cities of Oakland & Piedmont
- Contra Costa County
 - Unincorporated County
 - City of Orinda

Legend

- Substation
- Existing 230 kV Transmission Line
- State Route/Highway
- Arterial
- Local Street
- Project Components**
 - Four Existing Overhead 115 kV Lines to be Rebuilt in Same Overhead Configuration
 - Four New Underground 115 kV Lines
 - Four Existing Overhead 115 kV Lines to be Removed
- East Bay Regional Park District
- EBMUD Property
- Other Park or Recreation Area
- County Boundary
- City of Berkeley
- City of Moraga
- City of Lafayette
- City of Oakland
- City of Orinda
- City of Piedmont

Moraga-Oakland X 115 kV Rebuild Project

Proposed by
Pacific Gas & Electric Company



Proposed Project Purpose

Purpose: Replace existing power line equipment that has reached the end of its useful life for safe operation of the lines.

The basic objectives of the MOX Project are to:

- Provide lifecycle updates of Moraga–Oakland X 115 kV four circuit power line path by removing and replacing four circuits to avoid future reliability issues while maintaining safe operations.
- Replace four project power line circuits using a larger size conductor that will accommodate the region's reasonably foreseeable future energy demands.
- Ensure the project at completion meets power line reliability and safety requirements, and industry standards.
- Construct a safe, economical, and technically feasible project that minimizes environmental and community impacts.

Project Summary

- Proposed upgrades to ~5-miles of two existing overhead parallel double-circuit 115 kV power lines within existing PG&E land rights between Moraga & Oakland X substations.
- Project would rebuild the four overhead lines into four hybrid lines, with both overhead (~4 miles) and underground (~1 mile) segments. Some recently replaced power line structures would be reused or reused with some modification.
- Includes installation of optical ground wire on aboveground structures with a communication cable continuing within the underground portion.
- Project would also modify the Moraga & Oakland X substations.
- Construction would start in 2028.



CEQA: Environmental Resource Areas

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

For Each Resource Area, the EIR will ...

- Define and Describe Existing Setting
 - Environmental setting
 - Regulatory setting
- Establish Thresholds of Significance
 - What defines a “significant” impact
- Identify Project Impacts and Mitigation
 - PG&E Applicant Proposed Measures
 - CPUC Mitigation Measures
 - Significance after mitigation
- Evaluate Cumulative Impacts
- Impacts of Alternatives



CEQA: Project Alternatives

- Alternatives may be considered or suggested by PG&E (see PEA Ch. 4), public/agencies, and/or developed by the CPUC EIR Team.
- Alternatives for the EIR will be determined by CEQA requirements:
 1. Consistency with most project objectives;
 2. Ability to reduce or avoid impacts of proposed project;
 3. Feasibility.
- Alternatives may include changes to structure design or location within the project right-of-way, routing, other technologies (e.g., underground lines), etc.
- No Project Alternative will also be considered.
- Scoping comments suggesting alternatives are welcome.

To Get Involved in the CEQA Process

- You're on the right track!
 - Please stay on and provide your scoping input
- Scoping Process
 - Notice of Preparation published on February 25, 2025
 - Scoping Period closes on **March 27, 2025, at 5:00 p.m.**
 - How to comment:
 - Verbally at this scoping meeting and/or by submitting a written Scoping Letter via email to MOX@AspenEG.com
- Draft EIR
 - Anticipated release: 2nd quarter 2025, followed by a public comment period

CPUC Project Webpage: [PG&E Moraga-Oakland X 115 kV Rebuild Project: Home](#)

How to Submit a Scoping Comment

E-mail: MOX@aspeneg.com

Address to: Tharon Wright, CPUC

Subject line: Moraga-Oakland X Project

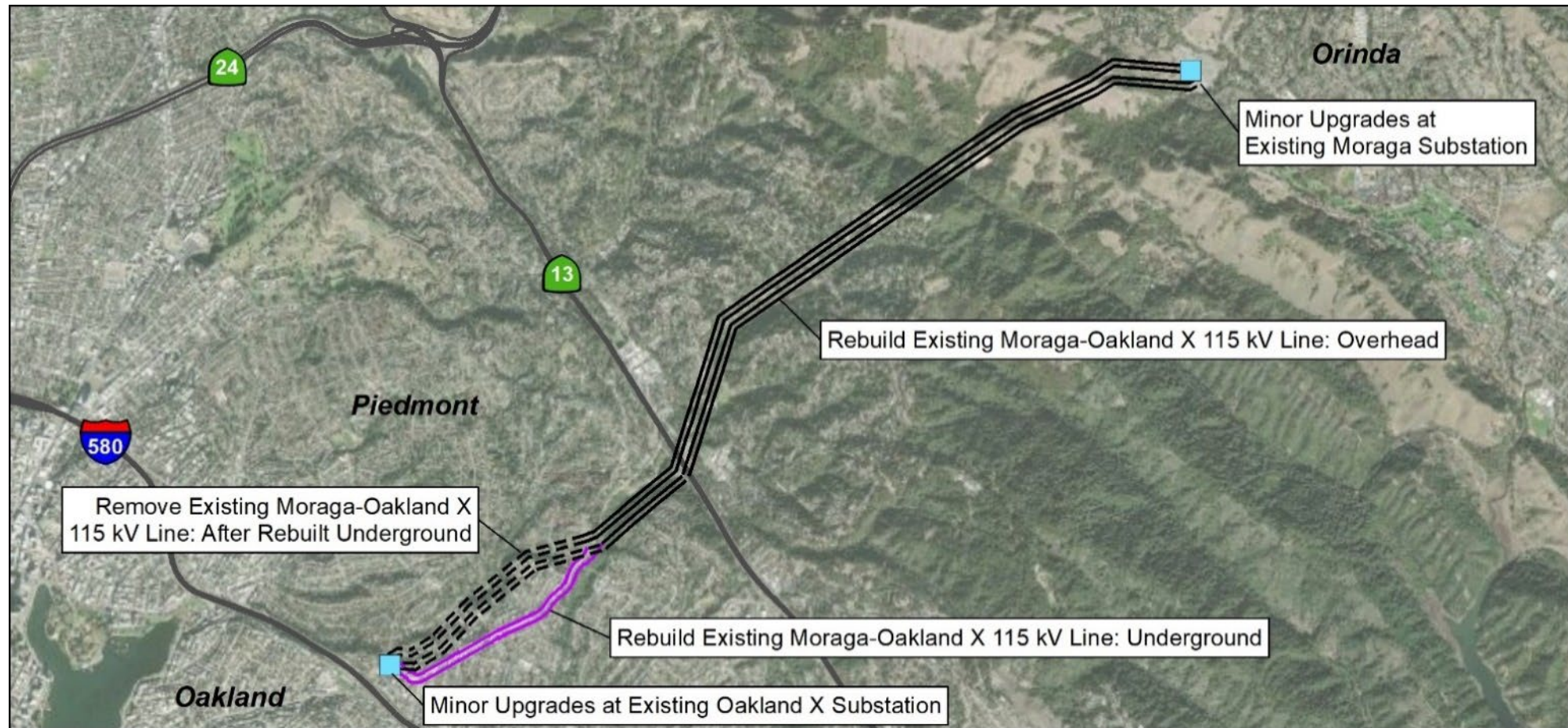
Please be sure to include your name, address, and phone number on all comments.

Scoping Comment Deadline: (5 p.m.) March 27, 2025

Project Webpage:

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

Public Comments



Discussion Guidelines

- Please state your name & affiliation
- Be concise
- Stay on topic
- Respect others' opinions
- Comments will be recorded
- Written comments are encouraged



Public Comments

Via the Zoom Platform

- Click the **RAISE HAND** icon to be called on



By Telephone

- Dial *9 to request to raise hand
- Dial *6 to unmute yourself when asked



Thank you for joining!

E-mail: MOX@aspeneg.com

Address to: Tharon Wright, CPUC

Subject line: Moraga-Oakland X Project



Scoping comments will be accepted through March 27, 2025

Webpage: [PG&E Moraga-Oakland X 115 kV Rebuild Project: Home](#)

PG&E PEA Alternatives (PEA Chapters 4 & 6)

- **Alternative A:** Moraga–Oakland X 3-Circuit Replacement with Moraga–Claremont Reconductoring and Park Boulevard/Lincoln Avenue Underground
- **Alternative B:** Manzanita Drive-Colton Boulevard-Estates Drive Underground
- **Alternative C:** Shepherd Canyon Road Underground
- **Alternative E:** Proposed Project with Campground Overhead Option
- No Project Alternative

Attachment D

WRITTEN SCOPING COMMENTS

Scoping Comment Log

Moraga to Oakland X 115 kV Rebuilt Project EIR

CMT NO.	DATE	FROM
A: Public Agencies		
A001	03-24-2025	California Department of Fish and Wildlife (CDFW)
A002	03-21-2025	Caltrans District 4
A003	03-21-2025	East Bay Municipal Utility District
A004	03-27-2025	City of Orinda
A005	03-27-2025	East Bay Regional Park District
B: Groups, Organizations, and Companies		
B001	02-25-2025	Junior Center of Art and Science
B002	03-26-2025	Sprinkles Parents Community*
B003	03-26-2025	Matthew Solomon and Natasha Desai on behalf of Oakland Neighbors: Matthew Solomon & Natasha Desai; Beata Milhano & Alexandre Milhano; Rebeca Lai & Tony Lai; Catherine & David Ayers; Adrienne Hink; Jennifer Wilkins; Jason Rife; David Reichmuth; Kris and Gene Vann; Sara and Barry Mohn; DeAnn Kennedy; Tina Chang; Forrest Wright; Rolf Nelson; Joey Hansell & Peter Crigger; Paul & Kathleen Rohrdanz; Rich & Wanda Lucas; Bob & Antonia Lattin; Alice Gillen & Daniel Siefman; Beth Wrightson & Kelly Algier; Rachel Kraftsmith; Cybele MacHardy
C: Tribal Governments		
C001	02-25-2025	Chicken Ranch Rancheria Me-Wuk Indians of CA
C002	02-26-2025	Muwekma Ohlone Tribe of SF Bay
C003	02-27-2025	Native American Heritage Commission (NAHC)
D: Public Meetings**		
Afternoon Meeting		
D001	03-13-2025	Kevin Dalley
D002	03-13-2025	Pete Retondo
D003	03-13-2025	Jonathan Meyers
D004	03-13-2025	Matt Derkach
D005	03-13-2025	Hugh
D006	03-13-2025	Priti Brahma
Evening Meeting		
D007	03-13-2025	Douglas Harmon
D008	03-13-2025	Jennifer Arnest
D009	03-13-2025	Doug Harmon
D010	03-13-2025	Donna Johnke
D011	03-13-2025	Matt Solomon

CMT NO.	DATE	FROM
D012	03-13-2025	Paul Kubachek
D013	03-13-2025	Matt Solomon
D014	03-13-2025	Mike
D015	03-13-2025	Rachel Colby
D016	03-13-2025	Doug Harmon
D017	03-13-2025	Martin Arnest

E. Individuals

E001	02-28-2025	Kathryn Marshall
E002	02-28-2025	Elizabeth Hansell
E003	03-03-2025	Barbara Rosenfeld
E004	03-03-2025	Carole Lehrman
E005	03-04-2025	Jennifer Arnest
E006	03-04-2025	Susan Landon
E007	03-07-2025	Alice Gillen
E008	03-07-2025	Kristine Mechem
E009	03-09-2025	Gerald Dzendzel
E010	03-10-2025	Andrew Cohen
E011	03-10-2025	Rich Lucas
E012	03-10-2025	Wanda Mahnokini
E013	03-11-2025	Jim Gardia
E014	03-13-2025	Roger Davies
E015	03-13-2025	Jane Wellenkamp
E016	03-13-2025	Genevieve Klyce
E017	03-15-2025	Kevin Dalley
E018	03-16-2025	Joyce Domanico-Huh
E019	03-16-2025	Bernard Cappelli
E020	03-17-2025	Cybele MacHardy and Dag Lohmann
E021	03-17-2025	Deborah Miller
E022	03-17-2025	Jennifer and Brian Wilkins
E023	03-17-2025	Jun Furuta
E024	03-18-2025	Jeni Paltiel
E025	03-19-2025	Rachel Colby
E026	03-20-2025	Mark Johnson
E027	03-22-2025	Sarah Saltzer
E028	03-25-2025	Barbara Rosenfeld
E029	03-25-2025	Beth Wrightsonn
E030	03-25-2025	Renee Cameto
E031	03-26-2025	Anedra Guinn

CMT NO.	DATE	FROM
E032	03-26-2025	Donna Johnke
E033	03-26-2025	Jason Rife and Reem Malik
E034	03-26-2025	John and Jessica Campbell
E035	03-26-2025	Ken Heilig
E036	03-26-2025	Lars Johnson
E037	03-26-2025	Lisa Diamond
E038	03-26-2025	Marvin Schwartz
E039	03-27-2025	Cynthia Barbera
E040	03-27-2025	David Reichmuth
E041	03-27-2025	Jean Marcuzzo
E042	03-08-2025	Dale and Roswitha Robinson
E043	03-27-2025	Janet Hailer
E044	03-28-2025	Brenda So
E045	03-28-2025	BK Doyra
E046	03-26-2025	Denis Neema*
E047	03-26-2025	Andrew and Patricia Jeffries
E048	03-27-2025	Linda Walton

* Indicates a Form Letter.

** Recordings of the virtual public scoping meetings, including oral comments received, are posted on the CPUC's Project website at: <https://ia.cpuc.ca.gov/environment/info/aspen/moraga-oakland/moraga-oakland.htm>



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



A01 CDFW 2025-03-24

March 24, 2025

Tharon Wright, Public Utilities Regulatory Analyst IV
California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814
Tharon.Wright@cpus.ca.gov

Subject: PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2025020944, Alameda and Contra Costa counties

Dear Tharon Wright:

The California Department of Fish and Wildlife (CDFW) has reviewed the California Public Utilities Commission Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the California Public Utilities Commission, as the Lead Agency, with specific details about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any Project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports findings of overriding consideration for impacts that remain significant despite the implementation of all feasible mitigation. Findings of Consideration (FOC) under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting rivers, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct

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the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to Notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to Notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: Pacific Gas and Electric Company (PG&E)

Objective: The objective of the Project is to rebuild the four-circuit power line path with new equipment, including replacing the existing conductor with one of a larger size to accommodate future energy demands and to ensure the lines are rebuilt with adequate line clearances between the ground or land use. Primary Project activities include rebuilding four overhead 115 kilovolt (kV) power lines 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 portion 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 Project would include the installation of a static ground wire and an optical ground wire connecting to

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each aboveground structure with grounding and a telecommunication cable continuing with the underground portion.

Location: The Project is located within unincorporated Contra Costa and Alameda counties, and the cities of Orinda, Oakland, and Piedmont. The existing land uses within 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.

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental impact. Please include a complete description of the following Project components in the Project description including, but not limited to, the below information:

- Land use changes resulting from, for example, rezoning certain areas.
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving and stationary machinery.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland setback distances that Alameda or Contra Costa counties may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur,

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or have the potential to occur in or near the Project site, include, but are not limited to the species listed in Attachment A.

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information can the California Public Utilities Commission adequately assess which special-status species are likely to occur on the Project site and in the Project vicinity.

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at:

<https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Changes in hydrological conditions that could alter the timing and magnitude of streamflows both during construction and operation of the Project;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks);

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- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence from both construction and operation of the Project;
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.
- Water quality impacts resulting from construction and operation of the Project; and
- Impacts to bed, channel, bank and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat, including impacts downstream of the Project.

The CEQA document also should identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the California Public Utilities Commission, as the Lead Agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with the USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

Fully protected species such as golden eagle (*Aquila chrysaetos*), white-tailed kite (*Elanus leucurus*), bald eagle (*Haliaeetus leucocephalus*), and northern California ringtail (*Bassariscus astutus raptor*) may not be taken or possessed at any time except in limited circumstances (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Therefore, the draft EIR should include measures to completely avoid take of fully protected species.

COMMENTS AND RECOMMENDATIONS

Based on the information provided in the NOP, CDFW offers the comments and recommendations below to assist the California Public Utilities Commission in

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adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and/or indirect impacts on fish and wildlife (biological) resources. **These comments and recommendations are not an exhaustive list and CDFW may provide additional recommendations as more Project specific information is disclosed. The draft EIR must include a full Project Description, Environmental Setting, and Impact Analysis and Mitigation Measures as outlined above.** Editorial comments or other suggestions may also be included to improve the document.

COMMENT 1: Critical Habitat Setbacks.

Issue: The Project has the potential to encroach into various habitat types including riparian natural communities, wetlands and freshwater communities, and upland habitat types such as oak woodlands and grasslands. Encroachment into these habitat types can adversely impact sensitive species through reduction of habitat, reduced reproductive success, reduced health and vigor, nest abandonment, loss of nest trees, and/or loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), habitat loss, turbidity, reduced water quality, introduction of debris and/or deleterious materials into stream habitats, direct mortality, and more.

Evidence impact would be significant: Habitat types in the Project area provide many essential benefits to terrestrial, avian and aquatic species, including, but not limited to thermal protection, water quality, cover, large woody debris, foraging areas, breeding and rearing sites, pollution and contamination buffers and connectivity. Project activities adjacent to these habitats can result in fragmentation of habitat and decreases in native species abundance and biodiversity. For example, riparian buffers help keep pollutants from entering adjacent waters through a combination of processes including dilution, sequestration by plants and microbes, biodegradation, chemical degradation, volatilization, and entrapment within soil particles. Narrow riparian buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosfokske et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Recommendation 1: CDFW recommends the Project establish, and the draft EIR incorporate buffer zones to limit Project activities to areas outside of, and away from, sensitive habitats. CDFW is available to consult with the California Public Utilities Commission to determine appropriate site-specific buffers to reduce impacts to sensitive species and critical habitat to less-than significant levels. At a minimum, for smaller streams, CDFW recommends a 50-foot riparian buffer as measured from the dripline of trees to the nearest Project infrastructure; larger buffers would be needed for mainstem streams and rivers.

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COMMENT 2: Complete Inventory of Fully Protected, Threatened or Endangered, Candidate, and Other Special-Status Species and Impacts Analysis.

Issue: Since the Project spans approximately five linear miles and a variety of habitat types, the Project has the potential to impact a variety of special-status plant and wildlife species. The NOP does not identify special-status species that may occur within the Project area. Therefore, CDFW recommends that the California Public Utilities Commission identify species that may be potentially present within the Project area and assess the impacts of the Project on these species in the draft EIR.

Evidence impact would be significant: Primary covered activities consist of rebuilding approximately four miles of overhead power lines and the undergrounding of approximately one mile of power lines that are currently overhead with additional associated maintenance activities. Implementation of these activities has the potential to result in impacts to special-status species and degradation of sensitive habitat on which species depend. The overhead power lines implemented as part of the Project could also create a substantial collision risk for birds and bats, and an electrocution risk for raptors and other large birds.

Recommendation 2: CDFW recommends the draft EIR establish a complete inventory of special-status species with the potential to occur within the proposed Project area. Please see Attachment A in this letter as a starting point for species that should be assessed in the draft EIR. Detailed habitat assessments should be performed by a qualified biologist along the five-mile Project area to determine the presence of suitable habitat for individual plant and wildlife species. If it is determined habitat exists, protocol-level surveys should be performed to determine the presence or absence of special-status species. Survey results may be considered valid for approximately two years. If special-status species are documented within the Project area, the draft EIR should provide appropriate avoidance or minimization measures to ensure impacts to these species are reduced to less-than-significant levels. If impacts to CESA-listed species cannot be avoided, CDFW recommends the Project proponent apply for CESA take authorization under an ITP.

Recommendation 3: CDFW recommends the draft EIR include all effective and feasible design features and measures to avoid or reduce collision and electrocution risks on volant (birds and bats) species. The Project should be designed to be consistent with the *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (Avian Power Line Interaction Committee [APLIC] 2006).

COMMENT 3: Timeframe of Project activities.

Issue: The timeframe of Project activities is not defined in the NOP, which is needed to determine the full impacts of the Project and any mitigation that may be required.

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Evidence impact would be significant: The life history of biological resources may be seasonal, such as migration, breeding, or nesting. Project activities that coincide with key biological processes have the potential to have significant impacts on species growth and reproduction. In addition, Project activities that last longer than one year or that occur in the same season in subsequent years have the potential to impact species over multiple breeding cycles, for example. Disturbance across multiple seasons could negatively impact species abundance and viability over time, particularly if the disturbance occurs during critical stages in a species' life history.

Recommendation 4: CDFW recommends that the term and seasonal work window of Project activities be defined in the draft EIR. Considering the timeframe of Project activities will aid in assessing the impacts of the proposed Project on species that may occur in the Project area. Furthermore, having a better understanding of the Project's impact on species will allow the development of appropriate compensatory mitigation for impacts.

COMMENT 4: Drilling associated with undergrounding of power lines.

Issue: The NOP identifies that approximately one mile of existing overhead power lines will be put underground and will be located within or along the boundary of Sausal Creek, Indian Gluch/Pleasant Valley Creek, and the Oakland Estuary watershed. The movement of powerlines underground may involve jack and bore drilling, horizontal directional drilling, or other trenchless conduit installations techniques. These activities have the potential to disturb wildlife and habitat, negatively impact water resources and water quality, or result in a hazardous spill or environmental contamination.

Evidence impact would be significant: Trenchless construction techniques involve heavy machinery, including hydraulic jacks or rams, augers or drills. The vibrations and noises associated with drilling have the potential to flush, disturb, confuse, or injure wildlife. In addition, the accidental release of drilling fluids into water bodies or upland habitats or the destabilization of stream banks are risks associated with drilling. Environmental contamination associated with drilling can reduce water quality or destroy sensitive habitats, which can have consequences for wildlife. Furthermore, the destabilization of stream banks can cause erosion, reduce connectivity for aquatic species, or destroy riparian habitat.

Recommendation 5: CDFW recommends that the geology and hydrology of the Project area be mapped and any drilling activities be fully described and mapped in the draft EIR. These descriptions and maps should include detailed locations and depths of underground lines that may pass under streams or other sensitive habitats. The California Public Utilities Commission should also consider if dewatering activities associated with any drilling may be necessary. Finally, CDFW recommends that a LSA

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Agreement be obtained for any drilling activities that may affect the bed, bank or channel of a lake or stream.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP in order to assist the California Public Utilities Commission in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jennifer Hoey, Environmental Scientist, at (707) 815-9978 or Jennifer.Hoey@wildlife.ca.gov; or Brenda Blinn, Senior Environmental Scientist (Supervisory), at (707) 339-0334 or Brenda.Blinn@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

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Attachments: Attachment A

cc: Office of Planning and Research, State Clearinghouse (SCH No. 2025020944)
Melissa Farinha, CDFW Bay Delta Region - Melissa.Farinha@wildlife.ca.gov
Brenda Blinn, CDFW Bay Delta Region - Brenda.Blinn@wildlife.gov

REFERENCES

- Avian Power Line Interaction Committee (APLIC). 2006. *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, CA.
- Brosofske, K.D., J. Chen, R.J. Naiman, and J.F. Franklin. 1997. Harvesting effects on microclimatic gradients from small streams to uplands in western Washington. *Ecological Applications* 7:1188-1200.
- Castelle, A.J., C. Conolly, M. Emers, E.D. Metz, S. Meyer, M. Witter, S. Mauermann, T. Erickson, and S.S. Cooke. 1992. Wetlands buffers use and effectiveness. Adolfson Associates, Inc., Shorelands and Coastal Zone Management Program, Washington Department of Ecology, Olympia, WA. Pub. No. 92-10.
- Kiffney, P. M., J. S. Richardson, and J. P. Bull. 2003. Responses of periphyton and insects to experimental manipulation of riparian buffer width along forest streams. *Journal of Applied Ecology* 40:1060-1076.
- Moore, R. D., D. L. Spittlehouse, and A. Story. 2005. Riparian microclimate and stream temperature response to forest harvesting: a review. *Journal of the American Water Resources Association* 41:813-834.

Tharon Wright
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ATTACHMENT A

Common name	Scientific name	Status
Amphibians & reptiles		
California red-legged frog	<i>Rana draytonii</i>	FT, SCC
northwestern pond turtle	<i>Actinemys marmorata</i>	FPT, SSC
Alameda whipsnake	<i>Masticophis lateralis euryxanthus</i>	FT, ST
Fish		
Steelhead, central California coast DPS	<i>Oncorhynchus mykiss pop. 8</i>	FT, SSC
Steelhead, central valley DPS	<i>Oncorhynchus mykiss pop. 11</i>	FT, SSC
Birds		
Golden eagle	<i>Aquila chrysaetos</i>	SFP
White-tailed kite	<i>Elanus leucurus</i>	SFP
Bald eagle	<i>Haliaeetus leucocephalus</i>	SE, SFP
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC
Yellow warbler	<i>Setophaga petechia</i>	SSC
Grasshopper sparrow	<i>Ammodramus savannarum</i>	SSC
Long-eared owl	<i>Asio otus</i>	SSC
Mammals		
San Francisco dusky-footed woodrat	<i>Neotoma fuscipes annectens</i>	SSC
American badger	<i>Taxidea taxus</i>	SSC
northern California ringtail	<i>Bassariscus astutus raptor</i>	SFP
Pallid bat	<i>Antrozous pallidus</i>	SSC
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC
western red bat	<i>Lasiurus frantzii</i>	SSC

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 Page 13

Invertebrates		
Crotch's bumble bee	<i>Bombus crotchii</i>	SCE
Monarch – California overwintering population	<i>Danaus Plexippus Plexippus pop. 1</i>	FPT
Plants		
San Francisco popcornflower	<i>Plagiobothrys diffuses</i>	SE
Pallid manzanita	<i>Arctostaphylos pallida</i>	FT, SE
Presidio clarkia	<i>Clarkia franciscana</i>	FE, SE
Robust spineflower	<i>Chorizanthe robusta var. robusta</i>	FE
Notes: DPS = Distinct Population Segment; FE = federally endangered under ESA; FT = federally threatened under ESA; FPE = federally proposed – endangered; FPT = federally proposed – threatened; FC = federal candidate for listing under ESA; SE = state endangered under CESA; ST = state threatened under CESA; SCE = state candidate for listing as endangered under CESA; SCT = state candidate for listing as threatened under CESA; SFP= state fully protected; SSC = state species of special concern.		

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: McGee, Mary@DOT <Mary.McGee@dot.ca.gov>
Sent: Friday, March 21, 2025 2:02 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: LDR D4@DOT; McGee, Mary@DOT
Subject: Moraga-Oakland X Project

Hi Tharon,

Thank you for including Caltrans in the review of the Moraga-Oakland X Project. We have no comments at this time and we look forward to reviewing the DEIR when it becomes available.

Best,
Mary

Mary McGee (she/her)
Transportation Planner
Caltrans District 4
510.907.0988

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Wen, Amy <amy.wen@ebmud.com>
Sent: Friday, March 21, 2025 9:58 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project
Attachments: wdpd25_038 PG&E Moraga-Oakland X115 Kilovolt Rebuild Project.pdf

Good morning,

Please find EBMUD's comment letter for the PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project attached.

Thank you,

Amy Wen | Sr Administrative
Clerk Water Distribution
Planning Division





March 21, 2025

Tharon Wright, Public Utilities Regulatory Analyst IV
California Public Utilities Commission
300 Capitol Mall Suite 500
Sacramento, CA 95814

Re: Notice of Preparation of a Draft Environmental Impact Report for the PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project

Dear Mr. Wright:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project (Project) located in the Cities of Oakland, Moraga, and Piedmont. EBMUD has the following comments.

WATER DISTRIBUTION PIPELINES

EBMUD owns and operates water distribution and transmission pipelines throughout the Project site which provide continuous service to EBMUD's customers in the area. Any proposed construction activity within the Project site would need to be coordinated with EBMUD so that the integrity of these water mains are maintained at all times. Pipelines within the roadways where the Project proposes 4 new underground 115 KV lines are listed in Table 1.

Table 1 – Pipelines within Proposed 4 New Underground 115 KV Lines

<u>Pipe Diameter</u>	<u>Road</u>	<u>EBMUD Distribution Map</u>
6-inch	Excelsior Avenue	1497B478
6-inch	Alma Place and Excelsior Avenue	1497B478
6-inch	Grosvenor Place and Park Boulevard	1497B478
6-inch	Park Boulevard	1500B478
6-inch	Park Boulevard Way	1500B478
6-inch	Emerson Way and Park Boulevard	1500B478
6-inch	Emerson Street and Park Boulevard	1500B478
6-inch	Greenwood Avenue and Park Boulevard	1500B478
6-inch	13 th Avenue and Park Boulevard	1500B478
6-inch	East 38 th Street and Park Boulevard	1500B478
6-inch	Beaumont Avenue and Park Boulevard	1500B478
6-inch	Brighton Avenue and Park Boulevard	1500B478

6-inch	Glen Park Road and Park Boulevard	1500B480
8-inch	Hampel Street and Park Boulevard	1500B480
6-inch	Glenfield Avenue and Park Boulevard	1500B480
8-inch, 16-inch, and 48-inch	Wellington Street and Park Boulevard	1500B480
6-inch	Edgewood Avenue and Park Boulevard	1500B480
4-inch and 6-inch	Everett Avenue and Park Boulevard	1503B480
6-inch	El Centro Avenue and Park Boulevard	1503B480
6-inch	Dolores Avenue and Park Boulevard	1503B480
6-inch	San Luis Avenue and Park Boulevard	1503B480
8-inch	Hollywood Avenue and Park Boulevard	1503B482
6-inch	Trestle Glen Road and Park Boulevard	1503B482
6-inch and 16-inch	Leimert Boulevard and Park Boulevard	1503B482
8-inch and 20-inch	Saint James Drive and Park Boulevard	1503B482
6-inch	Estates Drive and Park Boulevard	1503B482

It is imperative to continue to coordinate with EBMUD during the development of the proposed Project, so reasonable time can be provided for planning, design, and construction if conflicts exist to avoid schedule impacts. PG&E and EBMUD will need to continue to work together as the scope of work is finalized for EBMUD infrastructure adjustments and relocations. EBMUD requires reasonable time to allocate resources and modify internal construction schedules. EBMUD recommends at least 18 months advance notification for upcoming street improvement projects to allow for a reasonable amount of time to perform water pipeline relocations. Table 2 provides a typical project schedule for EBMUD to design and relocate approximately 1,500 feet of 8-inch water pipeline. The required time may increase or decrease depending on the size, length and complexity of the water pipeline project; and if constructed by EBMUD crews or by Contractor.

Table 2 – Typical Project Schedule

<u>Required Time</u>	<u>Schedule Task</u>
1 month	Receive Street Improvement and Understand Impacts
1 month	Review Project and Planning Assessment
2 months	Collect Survey Data or Use Existing Survey from Requesting Agency
2 months	Draft Base Drawing for Water Main Relocation
3 months	Design Water Main Relocation
2 months	Develop Construction Bid Documents

3 months	Advertise and Award Water Main Relocation Project
4 months	Install New Water Main and Provide Temporary Paving

<i>18 months</i>	<i>Reasonable Notification Time</i> <i>(Typical Project: 1,500 feet of 8-inch pipe)</i>
------------------	--

EBMUD will not design piping or services until soil and groundwater quality data and remediation plans have been received and reviewed and will not start underground work until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the project sponsor is insufficient, EBMUD may require the project sponsor to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation, or EBMUD may perform such sampling and analysis at the project sponsor's expense. If evidence of contamination is discovered during EBMUD work on the project site, work may be suspended until such contamination is adequately characterized and remediated to EBMUD standards.

EBMUD's water distribution pipelines and valves must always be accessible to EBMUD staff in order to maintain high-quality domestic water and fire flow services and mitigate for planned and unplanned pipeline outages. PG&E is responsible for protecting in-place pipeline valves and ensuring that pipeline valves are accessible (i.e., not paved over) during and after Project construction. EBMUD recommends that PG&E review EBMUD as-built drawings and identify potential utility conflicts between Project improvements and existing EBMUD pipelines. Attached are EBMUD guidelines for requesting pipeline as-builts that include pipeline vertical data (see Attachment- EBMUD Map & Utility Information Request Form and Guidelines). EBMUD's process for requesting as-built drawings is a two steps process: 1) request EBMUD water distribution maps, and 2) submit to EBMUD marked-up EBMUD water distribution maps identifying which water pipeline as-builts are needed to evaluate water pipelines within street improvements. In some cases, EBMUD as-builts are not available and in those situations EBMUD recommends for local agencies to pothole and field locate utilities.

EBMUD'S DESIGN STANDARDS AND SPECIFICATIONS

When evaluating the need and method for relocating and adjusting EBMUD infrastructure (e.g., pipelines, meters, valves, and fire hydrants), please review EBMUD's Design Standards and Specifications for Mains 20-inches and Smaller, which are located on the following webpage under "Apply for Standard Water Service": <https://www.ebmud.com/customers/new-meter-installation>

PIPELINE VALVE COVER ADJUSTMENTS

For utility conflicts between the Project and existing EBMUD pipeline valve covers, PG&E must share with EBMUD conflict locations, and existing and final pavement grade elevations. EBMUD will support paving street improvement projects as follows:

- Grade change less than 0.5-inches - For street improvement projects with a grade change elevation less than 0.5-inches, EBMUD is not obligated to adjust pipeline valve covers to facilitate the construction of street improvements, pursuant to Streets & Highways Code Section 680, which states that EBMUD may not be required to relocate its facilities for a temporary purpose. However, EBMUD will provide valve cover rings, at no cost, to be used to make valve cover adjustments as needed. PG&E is responsible for protecting in-place EBMUD pipeline valve covers which will be inspected by EBMUD staff post project completion. Pipeline valves must remain accessible during and after project construction for water distribution operations (i.e., not paved over).
- Grade change greater than 0.5-inches - For street improvement projects with a grade change elevation greater than 0.5-inches, EBMUD will support the Project by adjusting pipelines valve covers (one time) to the final street grade. However, EBMUD is not obligated to adjust valves during construction to facilitate means and methods for completing street improvements, pursuant to Streets & Highways Code Section 680, which states that EBMUD may not be required to relocate its facilities for a temporary purpose. PG&E is responsible for protecting in-place EBMUD pipeline valve covers which will be inspected by EBMUD staff post project completion. Pipelines valves must remain accessible during and after project construction for water distribution operations (i.e., not paved over).
- Pipeline Valve Cover Upgrades - If PG&E determines a need to upgrade old pipeline valve covers to the new Christy G-05 Valve Box and Rise Installation, EBMUD will provide the valve boxes and covers, and will reimburse PG&E for the valve box upgrade at a reasonable cost. To upgrade pipeline valve covers and boxes, PG&E must enter into a Valve Box Agreement with EBMUD prior to start of pipeline valve cover upgrades. An EBMUD Union notification will be required to complete the work by the County's contractor.

WATER METER RELOCATIONS AND ADJUSTMENTS

When an agency like PG&E completes street improvements (e.g., replace sidewalks, street pavement, and storm drain pipelines) to improve both street safety and street aesthetics, EBMUD supports the agency by relocating water meters to meet Project objectives, current design standards (e.g., meters need to be placed at 1-foot off the face of curb), and mitigate utility conflicts. EBMUD relocates water meters to their new location once the area is staked and is ready for final meter placement (e.g., forms for new sidewalk and other features are in place). PG&E is then responsible for relocating the customer's private water service line to the new meter location. EBMUD is not financially liable for work beyond the water meter (i.e., private water line).

HYDRANT RELOCATIONS OR ADJUSTMENTS (SET-BACKS/SET- FORWARDS)

When PG&E completes street improvements (e.g., replace sidewalks and curbs) to improve both street safety and street aesthetics, PG&E must ensure that there are no conflicts between existing EBMUD fire hydrants and new curb ramps and sidewalks. Fire hydrants must be located 5-feet from the edge of curb ramps and 20 to 24- inches from the face of street curbs. Hydrant relocations are horizontal offsets that require the installation of new hydrant service laterals; hydrant relocations require the County to submit Hydrant Relocation Application with EBMUD's New Business Office (510-287- 1010) or via EBMUD's online water service application at <https://wsa.ebmud.com>.

PRE-CONSTRUCTION MEETING

PG&E shall invite EBMUD's Central Area Service Center Superintendent, Mario Soares (510-287-1104 or mario.soares@ebmud.com); Central Area Assistant Superintendent, Juan Serrano (510-453-7458); East Area Assistant Superintendent, Isaiah Hinton (510-287-7183 or isaiah.hinton@ebmud.com); and East Area Assistant Superintendent, Nicholas Farrell (510-287-7182 or nicholas.farrell@ebmud.com) to all pre-construction meetings.

If you have any questions concerning this response, please contact Sandra Mulhauser, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-7032.

Sincerely,



David J. Rehnstrom
Manager of Water Distribution Planning

DJR:AIT:djr
wdpd25_038 PG&E Moraga-Oakland X115 Kilovolt Rebuild Project

Attachments: A – Maps of EBMUD Distribution Mains
B – EBMUD Map & Utility Information Request Form and Guidelines

Potable Distribution System

- Potable Pipeline
- Service Lateral
- ⊙ System Valve (OL = Opens Left)
- ⊙ Check Valve
- ⊙ Zone Valve
- Change of Pipe ID
- ⊙ Rate Control Station
- ⊙ Regulator
- ⊙ Pressure Reducing Station
- ⊙ Flow Meter
- Manhole
- Service Connection
- Hydrant
- Facility
- Pumping Plant

Landbase

- EBMUD Right of Way
- EBMUD Property

LOCATIONS ARE APPROXIMATE – NOT INTENDED FOR DESIGN PURPOSES – REQUEST AS-BUILT DRAWINGS IF NEEDED FOR DESIGN WORK



This information is furnished as a public service by East Bay Municipal Utility District (District). The District makes every reasonable effort to produce and publish the most current and accurate information possible. However, the District makes no warranty express or implied, concerning this information's accuracy, completeness, reliability, or suitability for the recipient's intended use. Furthermore, the District assumes no liability associated with the use or misuse of this information. If you do not accept these terms, you must refrain from using the information and immediately return it. Please notify the District if discrepancies in the provided information are found.

By receiving the requested information, you agree that you, and any of your representatives authorized by the District to possess the information, will use the information only for the authorized purpose for which you requested it. If you obtained the information to prepare construction documents, you may make the information publicly available only to the extent necessary for safe construction. In all other circumstances, you may not provide any of the information, or any copy of it, to any other person or entity without the District's prior written approval. When you no longer require the information for your use, you must return or destroy all copies of the information. If you do not accept these terms, you must refrain from using the information and immediately return it.

1500B478

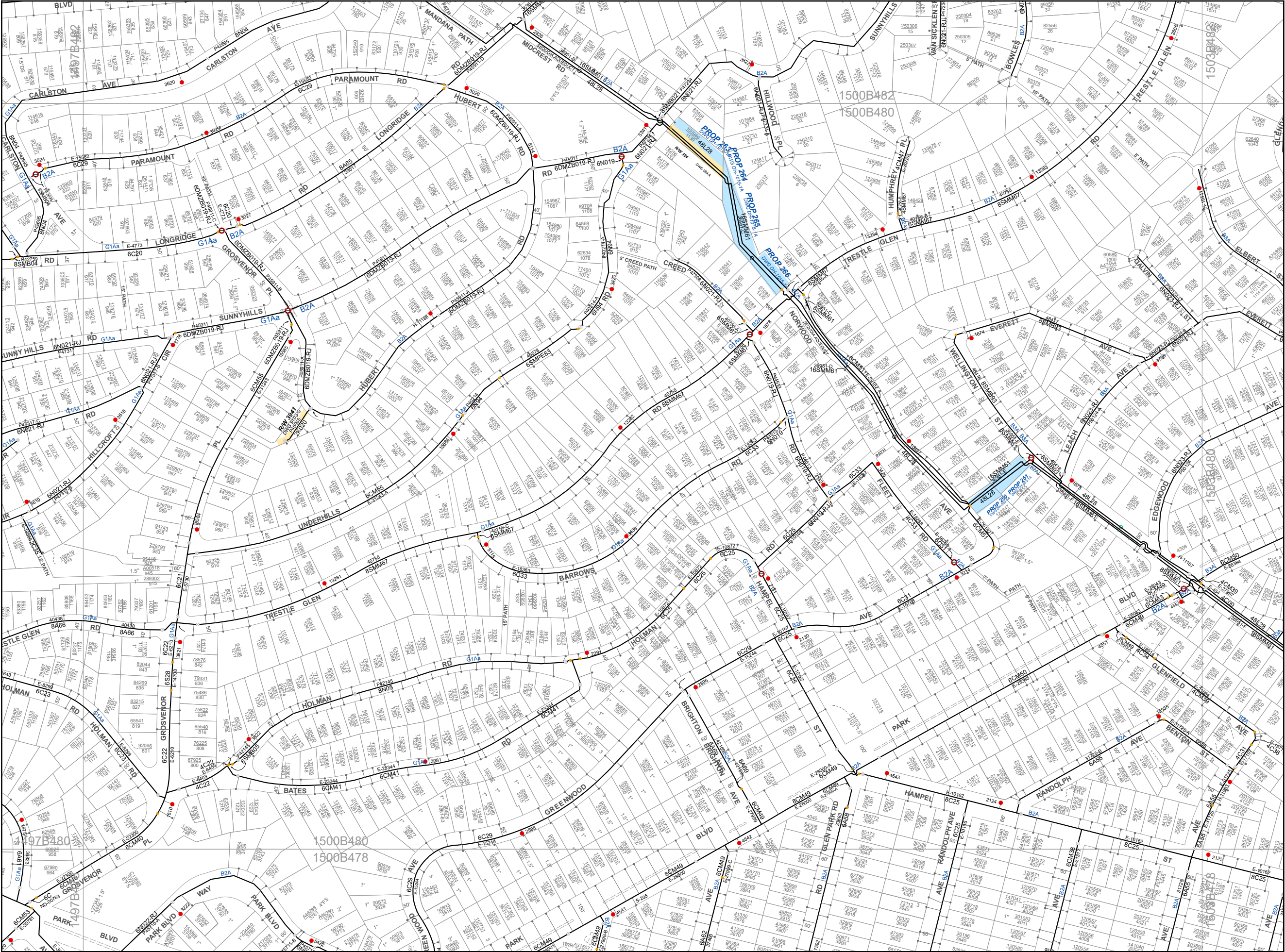
Potable Distribution System

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1500B480

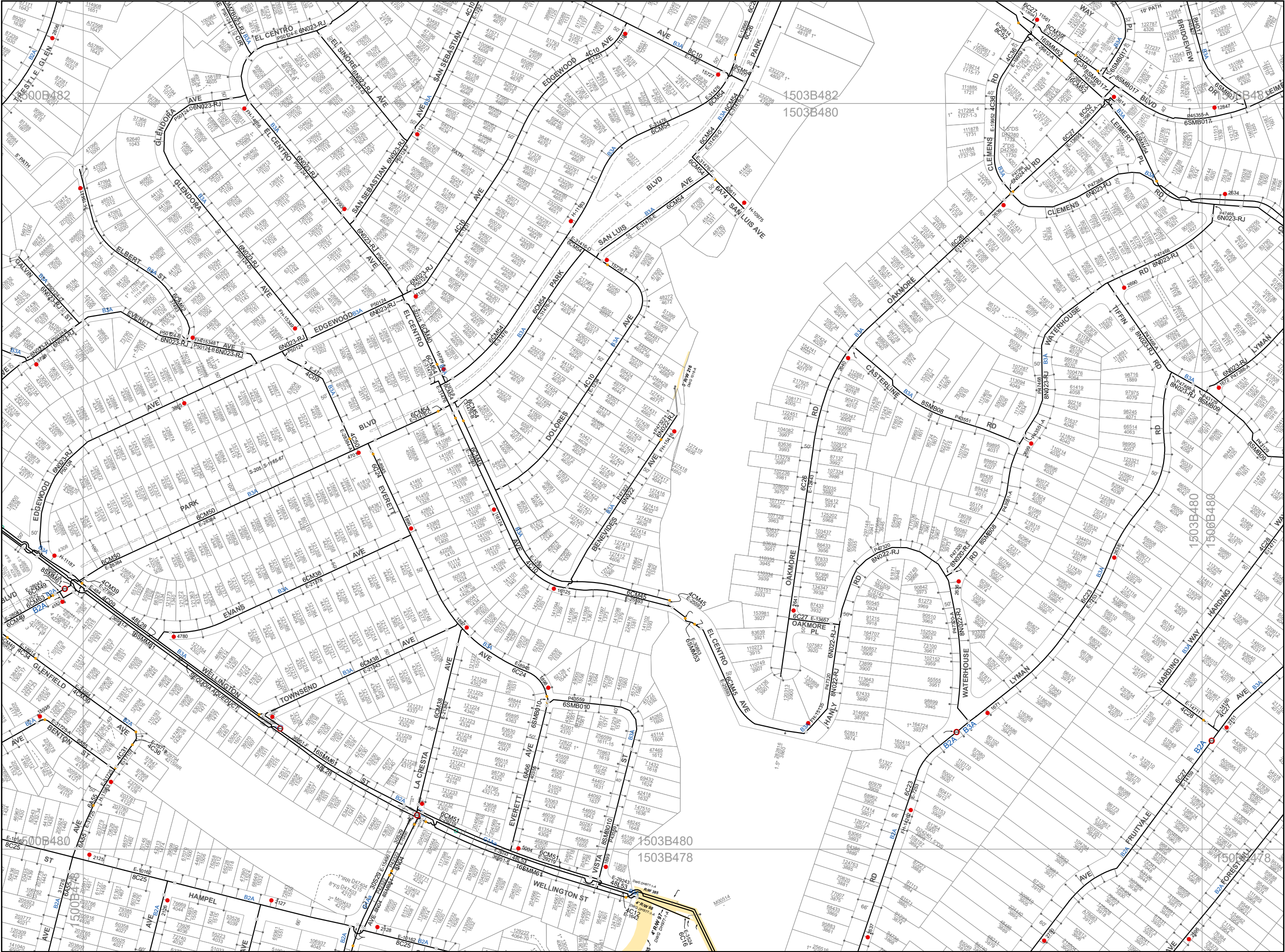
Potable Distribution System

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1503B480

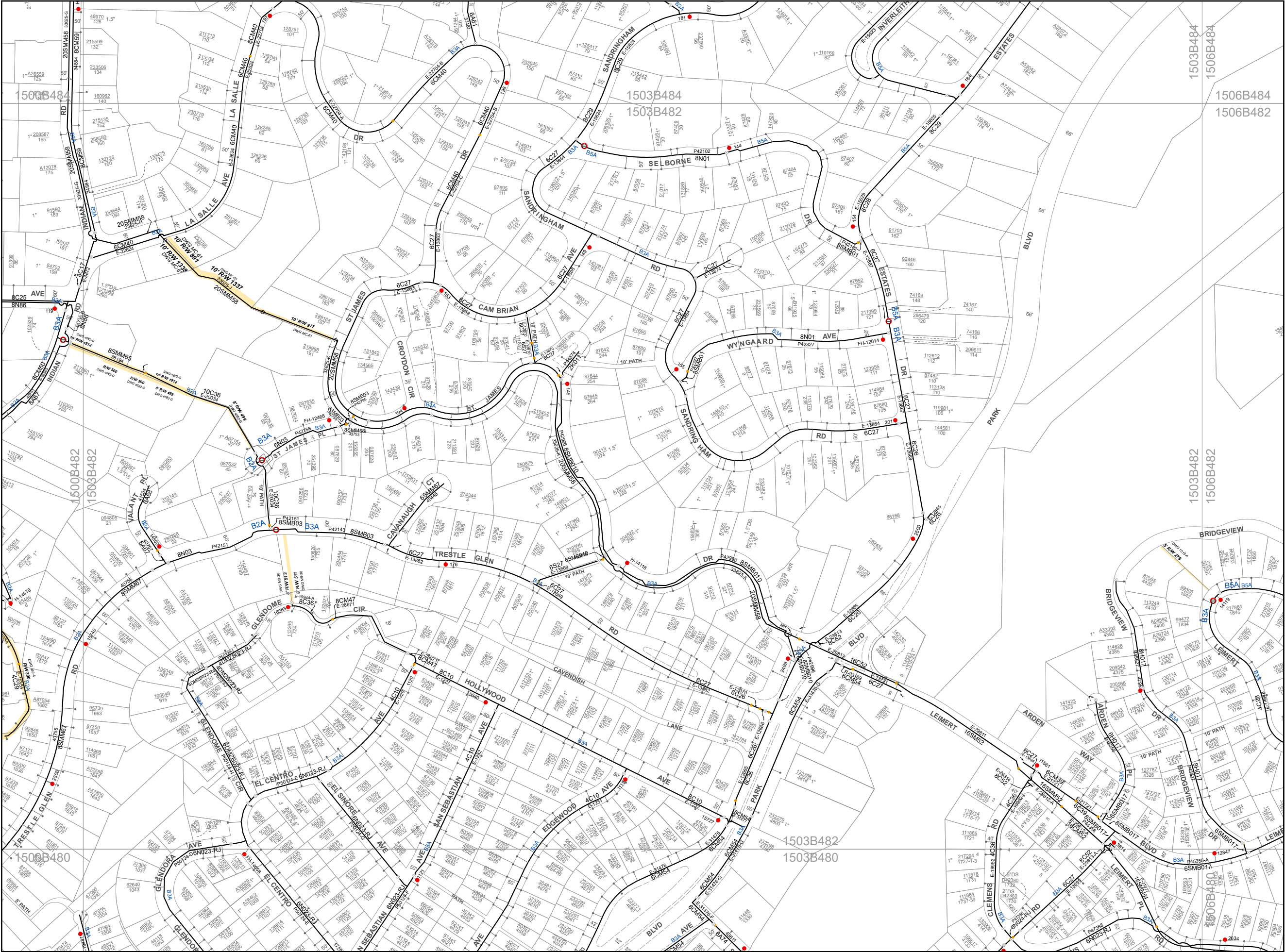
Potable Distribution System

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1503B482



Map & Utility Information Request Form

(Fillable PDF form)

Date of Submission:	
Requestor:	
Name	
Company/Agency	
Address	
Email	
Phone	
Purpose of Request: Provide brief reason for the requested Mapping or Utility Information	

*Include a Vicinity Map with all requests and
a Highlighted Map with all UTILITY INFORMATION requests*

(See the Map & Utility Information Guidelines for map examples)

With this submittal, I agree to the following:

This information is furnished as a public service by East Bay Municipal Utility District. The District makes every effort to produce and publish the most current and accurate information possible. This information must be accepted and used by the recipient with the understanding that the District makes no warranties, expressed or implied, concerning the accuracy, completeness, reliability, or suitability for the use of this information. Furthermore, the District assumes no liability associated with the use or misuse of such information. Please notify the District if discrepancies are found.

By receipt of requested documents, the DOCUMENT RECIPIENT agrees that he or she, and/or any other authorized representatives of the DOCUMENT RECIPIENT, will provide no copy (nor partial copy) to any other person or agency, will not redistribute any document to any other entity, business or individual, nor use the document for other than the specified purpose. At the point the document is no longer required for use by the DOCUMENT RECIPIENT, the data shall be returned to the District or destroyed.



EAST BAY MUNICIPAL UTILITY DISTRICT
Map & Utility Information Request Guidelines
July 29, 2019

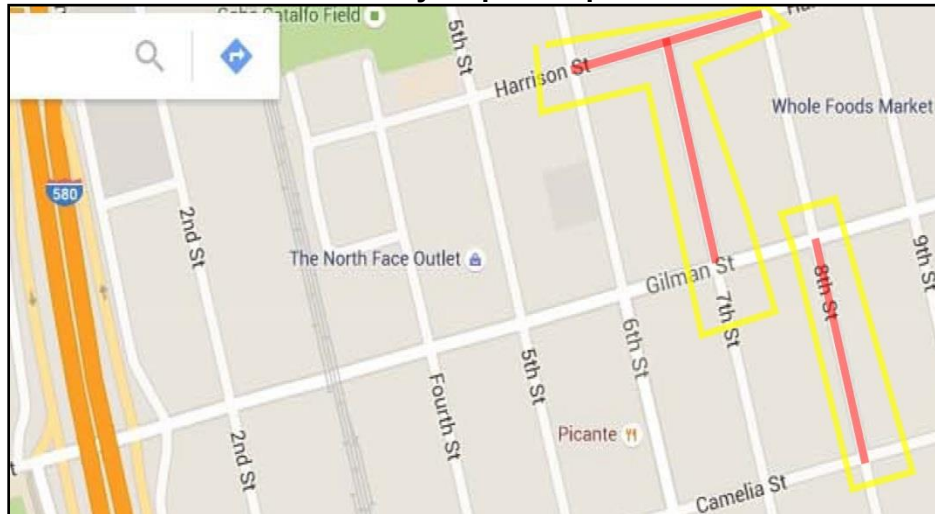
REQUESTING MAP INFORMATION FROM EBMUD

Mapping Services provides electronic PDF's of the WATER DISTRIBUTION SYSTEM map used by the District. Requests for maps showing other utilities should be submitted through the responsible agency. Water distribution pipelines and appurtenances will be shown as close as possible to actual field locations, but portions are often shifted or distorted to allow for visual clarity between graphic elements.

Complete the attached **Map & Utility Information Request Form** and include a **Site Vicinity Map** for the area being requested (see *Sample Vicinity Map* below).

Note to homeowners: Include a copy of personal identification, such as a Driver's License, with the request. The area being requested by residents must include the residence or property of the requestor. If the requested area does not specifically include the requestor, then the group or organization seeking this information must be properly identified.

Vicinity Map Example



Submit requests using one of the following methods (email preferred):

- Email: MapUnit@ebmud.com; Subject: [Mapping Information Request](#)
- Mail: EBMUD Mapping Services Request, PO Box 24055, MS 805, Oakland, CA 94623-1055

FAQs

How long will it take to process the request?

Requests are typically processed within five business days. The completeness of the information provided, the size of the area requested, and the volume of requests received each day may impact the processing time. Mapping Services may process requests on a rotating basis, so it is not necessary to address the request to a specific individual.

What if more detailed or accurate information is needed?

After receiving and reviewing the map provided, if more detail is needed, such as pipeline construction drawings showing pipe depth, please refer to **Page 2** of this guideline.



EAST BAY MUNICIPAL UTILITY DISTRICT
Map & Utility Information Request Guidelines
July 29, 2019

REQUESTING UTILITY INFORMATION FROM EBMUD

After receiving and reviewing the initial requested Water Distribution System map, if more detail is needed, such as detailed utility information, more accurate location, pipe depth, etc., please complete the attached **Map & Utility Information Request Form** and also include a map with **highlighted Extension Number(s)** to identify the construction drawing being requested (*see example of highlighted map below*).

Identifying Extension Numbers (Required for UTILITY INFORMATION requests)

An Extension Number is a number used to track the construction drawings for a pipe segment. The extension number may be five numbers only or five numbers with a one or two letter prefix and may include a single letter suffix. *NOTE: The "ND" designation means that EBMUD has "No Data" or construction drawings available for the pipeline.*

Highlighted Extension Number Map Example:



Submit requests using one of the following methods (email preferred):

- Email: utility.info@ebmud.com, Subject: Utility Information Request
- Mail: EBMUD Utility Information Request, PO Box 24055, MS 504, Oakland, CA 94623-1055

FAQ

What does the larger number near the Extension Number represent?

The Pipe Designation Number is the larger text, typically located below the pipe and near the extension number (e.g., 12CM54). This number represents the pipe's **NOMINAL DIAMETER**, **MATERIAL/LINING/COATING CODE**, and **INSTALLATION YEAR**, in that order.

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Lashun Cross <lcross@cityoforinda.org>
Sent: Thursday, March 27, 2025 2:47 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: tharon.wright@cpuc.ca.gov
Subject: PG&E Transmission Line Rebuild Project
Attachments: PG&E Transmission Lines .pdf

MOX EIR Team:

Please find attached comments from the city of Orinda regarding the NOP for an Environmental Impact Report (EIR) for the PG&E Transmission Rebuild Project.

Please do not hesitate to reach out.

Thank you,

Lashun

Lashun Cross, Director of Planning
City of Orinda Planning Department
22 Orinda Way
Orinda, CA 94563
925-253-4240 (direct)
www.cityoforinda.org





22 Orinda way • Orinda • California • 94563

March 27, 2025

Ms. Tharon Wright
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

**RE: 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)**

Pacific Gas and Electric Company (PG&E) filed an 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. As such, the purpose of the Project is to replace and rebuild power line equipment that has reached the end of its useful life. This maintenance is needed for safe operation of the lines.

The City of Orinda staff appreciate the opportunity to review and comment on the above-mentioned document. The city recommendations and comments regarding the impacts of the Proposed Project should be included in the analysis to identify any potential impacts that are described below:

Traffic and Transportation

The Moraga Substation is accessible by only one, two-lane road that serves as the primary point of entry and exit for the Lost Valley Drive neighborhood. Identify what type of strategies are planned for the Project to minimize the impact on traffic such as street closure and potentially hazardous conditions for people walking, bicycling, or driving. Additionally, identify what mitigation strategies will be in place in the event of an emergency to preserve access for emergency services and evacuation routes.

Staging

The City of Orinda would like more information about the temporary staging areas that will be set up during the project to allow for storage of construction materials, parking vehicles and equipment, and meeting areas, among other uses. Determine which locations are considered in Orinda for staging areas, particularly the ones that may be used for helicopter landing zones.



22 Orinda way • Orinda • California • 94563

Tree Removal

Identify the amount of vegetation removal that will be required, and whether this will include tree removal and other vegetation impacts. The City of Orinda may not support the removal of trees, particularly trees protected under the Orinda Municipal Code (oaks and native riparian trees) in accordance with the Orinda Municipal Code (OMC) Chapter 17.21, without proper analysis permits and/or restitution.

Noise

The City of Orinda is concerned about the possibility of construction noise disturbing the residents who live near the Moraga Substation. Outline which types of noise mitigation strategies will the Project employ to ensure that the Orinda residents near the site are not adversely impacted. The operation of helicopters for the Proposed Project has the potential to generate noise at a greater distance; identify the analysis and measures to reduce this impact.

Construction Hours

The City of Orinda Noise Control Ordinance (OMC) Chapter 17.39 states that construction hours should be limited from 8am to 6pm on weekdays, and from 10am to 5pm on Saturday. For a project of this scale, construction will not be permitted on Sundays. Additionally, use of heavy construction equipment is prohibited on Saturdays and Sundays. Confirm that the Project plans to comply with these hours of operation.

Undergrounding Transmission lines

Address the feasibility of undergrounding the section of powerlines that span Orinda. Describe the differences and reasoning for underground lines within the City of Oakland and overhead lines within the City of Orinda. Identify any potential impacts that could occur from overhead lines and mitigation for wildfire and prevention reduction measures.

The City of Orinda staff is available to work with the consultant to ensure that the project impacts are accurately evaluated and mitigated where feasible. If you have any question regarding this letter, please email me at lcross@cityoforinda.org or by use of a direct line at (925)-253-4240.

Sincerely,

Lashun Cross
Director of Planning

CC: Planning NOP file

General Information

(925) 253-4200 (ph)
(925) 254-9158 (fax)

Administration

(925) 253-4220 (ph)
(925) 254-2068 (fax)

Planning

(925) 253-4210 (ph)
(925) 253-7719 (fax)

Parks & Recreation

(925) 254-2445 (ph)
(925) 253-7716 (fax)

Police

(925) 254-6820 (ph)
(925) 254-9158 (fax)

Public Works

(925) 253-4231
(925) 253-7695

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Kim Thai <kthai@ebparks.org>
Sent: Thursday, March 27, 2025 3:07 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: East Bay Regional Park District Comments on PG&E's Moraga-Oakland X Project
Attachments: 2025 EBRPD Comments - PGE Moraga-Oakland X Project.pdf

Hello,

Attached is the East Bay Regional Park District's comment letter on PG&E's Moraga-Oakland X Project. Please let me know if you have any questions.

Best regards,
Kim



Kim Thai
Senior Planner | Planning, Trails, and GIS
East Bay Regional Park District
2950 Peralta Oaks Court, Oakland, CA 94605
T: 510-544-2320
kthai@ebparks.org | www.ebparks.org

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March 27, 2025

Tharon Wright, CPUC Project Manager
Moraga-Oakland X Project
Sent via: MOX@aspeneg.com

RE: East Bay Regional Park District Comments on PG&E's Moraga-Oakland X Project

Dear Ms. Tharon Wright,

The East Bay Regional Park District (Park District) appreciates the opportunity to provide comments on Pacific Gas & Electric Company's (PG&E's) proposed Moraga-Oakland X Rebuild Project (Project). The Project goes through the Park District's Robert Sibley Volcanic Regional Preserve (Sibley). Since construction of this Project would affect park operations, the Park District has been in coordination with PG&E to ensure the project minimizes impacts to the environment and to park operations.

Park District staff have the following comments:

- Access within Sibley:** Park District and PG&E staff have determined that PG&E will need to access the transmission towers and work area from Edgewood Road in Orinda through EBMUD access roads and onto Gudde Ridge Trail within Sibley. Due to the narrow turning area at the bridges, it is preferred that PG&E avoid crossing the bridges by going directly from Gudde Ridge Trail onto Arroyo Willow Trail and onto the helicopter landing / staging area at the future campground parking lot.

In the event that access from Edgewood Road is not feasible, PG&E would access from Sibley's Eastport Staging Area off Pinehurst Road and use the first bridge crossing. The Park District requests that PG&E notify and coordinate with Park District staff prior to any work within the park.
- Helicopter Landing/Staging Area:** While on a site visit with PG&E in fall 2024, Park District staff emphasized that the future campground, which is anticipated to be constructed and completed before PG&E's Moraga-Oakland X Project, would not be a feasible location for the helicopter landing due to the campground amenities that will be put in place. The campground parking lot could potentially be used as a helicopter landing and staging area, but PG&E would need to confirm that the 50' x 50' space would be wide enough for the helicopter's blade span.

Prior to any work, PG&E will need to apply for a Temporary Park Access permit with the Park District for the helicopter landing and staging area.
- Road improvements:** PG&E will plan to address needed road improvements along Gudde Ridge Trail north of the McCosker Loop Trail junction within the McCosker sub-area of Sibley as well as along the service road leading up to transmission towers EN9 and ES10. Park District staff request that PG&E staff coordinate closely with Park District Park Operations staff on these road improvements.
- Construction Timeline:** Since the transmission lines being replaced would go over the future Fiddleneck Campground in Sibley, Park District staff requests that PG&E coordinate the construction timeline with Park District staff to ensure the project timeline does not conflict with the campground construction or operations.
- Campground Overhead Option:** The *Alternative E: Proposed Project with Campground Overhead Option* would shift the transmission lines northwest 325 feet and make the transmission lines less visible from the campground, which would be better for stargazing. However, this option would result in additional impacts to the woodland

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habitat and would require tree removal in Sibley and Huckleberry Botanic Regional Preserve. For this reason, the Park District prefers the proposed project to reduce impacts to the woodland habitat.

The Park District appreciates the opportunity to review and comment on the proposed project. We request to receive notices of future referrals, environmental review, and public hearings for this project. If you have any questions or concerns, please contact me at (510) 544-2320, or by e-mail at kthai@ebparks.org.

Respectfully,



Kim Thai
Senior Planner
East Bay Regional Park District

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: sha <shacoleman@gmail.com>
Sent: Tuesday, February 25, 2025 8:19 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Best Regards,

Sha Coleman

Board Member
Junior Center of Art and Science
Oakland CA

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JCAS Tax ID # 94-1236838

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Brooke Shapiro <brooke.e.shapiro@gmail.com>
Sent: Wednesday, March 26, 2025 8:00 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Ms. Tharon Wright, CPUC Project Manager,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project. I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks. I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. Of course this is personal for us, as we lived through the Hills fire in the 90's, and also, our current home in Montclair sits so close to so many power lines, in fact one that sits directly on our property; however, it is the total loss of community that concerns us the very most when the next fire comes to the hills of Oakland, and it will. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,(your name and contact info here!!)

Best,

Brooke
Chief Mom Officer
[Sprinkles Parents Community](#)
[Brooke Shapiro Consulting](#)

[Case Studies](#)
973-796-0711
[Let's Chat](#)

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Matt Solomon <mattsol@gmail.com>
Sent: Wednesday, March 26, 2025 10:58 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: assemblymember.wicks@assembly.ca.gov; mxtivoli@yahoo.com; beckyclai@gmail.com; catherineayers@msn.com; adriennehink@gmail.com; jengwilks1@gmail.com; jsrife@hotmail.com; dave.reichmuth@gmail.com; Kris.p.vann@gmail.com; Esv72@hotmail.com; DeAnn.Kennedy@gmail.com; ropolaski73@gmail.com; wright.forrest@gmail.com; rolf.nelson@sbcglobal.net; Elizabeth Hansell; Paul Rohrdanz; Richard Lucas; Antonia Lattin; Beth Wrightson; sourirer@me.com; cybelemac@gmail.com
Subject: Scoping Comments for NOP of EIR for PG&E's Moraga-Oakland X (MOX) 115 Kilovolt (kV) Rebuild Project

Matthew Solomon & Natasha Desai
2400 Scout Rd
Oakland, CA. 94611
E-mail: mattsol@gmail.com

On behalf of Oakland neighbors co-signed below

Email: MOX@aspeneg.com March 26, 2025

Ms. Tharon Wright, CPUC Project Manager

RE: Public Comment on EIR Scoping for the Proposed PG&E Moraga-Oakland Transmission Rebuild Project (MOX 115 kV Rebuild Project)

Dear CPUC Commissioners and MOX EIR Team,

We are writing in strong opposition to PG&E's current proposal for the Moraga-Oakland Transmission Rebuild Project (MOX Project), which would replace century-old transmission towers with new overhead towers through the Montclair neighborhood. As a resident of this community, I urge the CPUC to mandate a full environmental scoping and serious evaluation of complete undergrounding—or full removal—of overhead transmission lines in this high-risk, heavily forested, and densely residential area.

The existing steel lattice towers were installed in 1908 and 1931, at a time when Montclair was sparsely populated. In 2025, this area has evolved into a vibrant and dense residential neighborhood located in a designated "Very High Fire Hazard Severity Zone." Continuing to run high-voltage transmission lines overhead through this terrain poses an unacceptable risk. The growing frequency and severity of wildfires—driven by both climate change and aging

infrastructure—require a more modern, forward-looking solution that protects life, property, and the public interest.

Recent fires in Paradise and Altadena have shown the catastrophic consequences of transmission line failures. PG&E's own Wildfire Mitigation Plan concedes that undergrounding virtually eliminates wildfire ignition risk. In light of this, PG&E's decision to propose rebuilding towers in the same alignment through Montclair—with only partial undergrounding elsewhere—is both dangerous and shortsighted.

While we appreciate that PG&E has proposed partial undergrounding alternatives (i.e., Alternative B, the Manzanita Drive–Colton Boulevard–Estates Drive Underground Alternative which is more complete than Alternative C, the Shepherd Canyon plan, which resurfaces to overhead lines at the current fire station along Shepherd Canyon Rd)—we believe this does not go far enough. We strongly urge the CPUC to direct full environmental scoping of a **fully undergrounded alignment** through Montclair down to the Oakland X Substation as the **optimal solution**, not just Alternative B. In addition, other alignments—such as routing the line along the Highway 24 corridor to the substation at Highways 24 and 13—should be explored for feasibility and lower wildfire exposure.

It is troubling that PG&E has not meaningfully engaged residents in the Montclair area, many of whom were unaware of the April 2024 public notice until much later in the process. Some neighbors, including those with towers in their backyards, never received any communication. This lack of transparency undermines public trust and raises serious concerns about procedural fairness.

Moreover, PG&E's own CEO, Patti Poppe, publicly acknowledged in her **2025 “Letter to You”** that undergrounding is both safer and more cost-effective than vegetation management. She noted:

“I know many of you think that undergrounding power lines is driving up rates. But here's the reality: on average, just \$1/month of your bill goes to undergrounding. Tree trimming on the other hand is \$20/month of the average bill. Undergrounding reduces wildfire risk 98%, so the more lines we bury, the safer you are, the more reliable our power is, and the less we have to spend cutting vegetation away from our lines.”

This directly undercuts PG&E's cost-based argument against undergrounding and reinforces our position: **undergrounding is a prudent, cost-effective, and essential investment** in public safety and environmental responsibility.

Additionally, maintaining overhead infrastructure requires continual and costly vegetation management, placing ongoing financial, environmental, and aesthetic burdens on the community—burdens which undergrounding would permanently eliminate.

The overhead infrastructure is also unsightly and there are significant aesthetic considerations to the rebuilding of these unsightly, outdated towers, including the aesthetic considerations of continued and increasing vegetation management required. It produces a constant stream of tree cutting and construction work throughout our neighborhoods, and given this is a major infrastructure project that may not occur for another 100 years, it is a time for California to once again do "big things", and move forward on a long-term, future-proofed solution that not only mitigates the wildfire risk but improves the character of the neighborhood and City.

Notably, PG&E has agreed to underground transmission lines through Piedmont and Crocker Highlands—areas that are **less steep, less forested, and at lower wildfire risk** than Montclair. It is inequitable and irrational to underground in lower-risk neighborhoods while refusing to do so in one of the most fire-prone areas of the Bay Area.

This is not just a transmission line rebuild—it is a **once-in-a-century opportunity** to reimagine and future-proof our neighborhood. We are in full support of Alternative B as a minimum step, but urge the CPUC to explore and require alternatives that **maximize undergrounding throughout Montclair and surrounding high-risk areas**. Undergrounding would reduce risk, increase resilience, and aligns with the broader goals of SB 884, which seeks to address fire mitigation and insurance affordability across California.

On behalf of our families and neighbors, we strongly request:

- That the CPUC require full environmental scoping and analysis of complete undergrounding alternatives through Montclair;
- That undergrounding be made the preferred and default solution for projects in “Very High” Fire Hazard Severity Zones;
- That the CPUC investigate whether PG&E met its public notification obligations in Spring 2024;
- That public hearings be held in the Montclair area to ensure community voices are heard.

Thank you for your attention to this critical matter. We look forward to your leadership in prioritizing public safety, equity, and long-term resilience.

Sincerely,

Matthew Solomon & Natasha Desai
2400 Scout Rd
Oakland, CA. 94611
mattsol@gmail.com

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7205 Wild Current Way, Oakland CA 94611
mxtivoli@yahoo.com

Rebeca Lai & Tony Lai
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Catherine & David Ayers
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Adrienne Hink
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Jennifer Wilkins
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David Reichmuth
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Kris.p.vann@gmail.com / Esv72@hotmail.com

Sara and Barry Mohn
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DeAnn Kennedy
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AntoniaTheRed@yahoo.com

Alice Gillen & Daniel Siefman

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Beth Wrightson & Kelly Algier

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Rachel Kraftsmith

6883 Sobrante Rd, Oakland CA 94611

sourirer@me.com

Cybele MacHardy

6401 Thornhill Dr, Oakland, CA 94611

cybelemac@gmail.com

cc Assemblymember Buffy Wicks

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Joanna Portillo-Hsu <jportillo-hsu@crtribal.com>
Sent: Tuesday, February 25, 2025 3:45 PM
To: Sharon Heesh; Tharon.Wright@cpuc.ca.gov
Subject: Re: PG&E Moraga-Oakland X 115 kV Rebuild Project - Notice of Preparation of a Draft EIR

Hello,

Presently, the Tribe has no comments, concerns, or questions about this project.

Thank you,



Joanna Portillo-Hsu
Environmental & Planning Manager
9200 Red Tail Hawk Drive,
PO Box 1159, Jamestown, CA 95327
Office: 209-984-9066 | jportillo-hsu@crtribal.com

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From: Sharon Heesh <sharonh@aspeneg.com>
Sent: Tuesday, February 25, 2025 2:22 PM
To: Tharon.Wright@cpuc.ca.gov <Tharon.Wright@cpuc.ca.gov>
Subject: PG&E Moraga-Oakland X 115 kV Rebuild Project - Notice of Preparation of a Draft EIR

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Dear Interested Parties

The California Public Utilities Commission (CPUC) has published the **Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or Pacific Gas and Electric Company's (PG&E's) Moraga-Oakland X(MOX) 115 Kilovolt (kV) Rebuild Project** (Project). The attached NOP includes a description of the proposed Project,

environmental effects that have been identified thus far for consideration in the EIR, and details on the 30-day scoping period. Written scoping comments must be submitted via email by March 27, 2025, for inclusion in the Draft EIR to MOX@aspeneg.com.

In addition, the CPUC will hold two virtual project scoping meetings to obtain input from agencies and the public on the scope and content of the EIR at:

Virtual Scoping Meetings – Thursday March 13, 2025	
2:30 to 4:00 p.m. <u>Attend by Zoom:</u> https://us02web.zoom.us/j/84175864740 <u>Attend by Phone:</u> (669) 4 44-9171 then enter Webinar ID: 841 7586 4740	5:30 to 7:00 p.m. <u>Attend by Zoom:</u> https://us02web.zoom.us/j/82814611227 <u>Attend by Phone:</u> (669) 9 00-6833 then enter Webinar ID: 828 1461 1227

Project Background: The MOX Project would involve proposed upgrades to approximately 5-miles of four overhead 115 kV power lines between Moraga and Oakland X substations in the City of Orinda, unincorporated areas of Contra Costa County, and the cities of Oakland and Piedmont within Alameda County. The two existing parallel double-circuit power lines are located within existing PG&E land rights, and the Project would rebuild the four overhead lines into four hybrid lines, with both overhead (~4 miles) and underground (~1 mile) segments.

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 line. Double-circuit transition structures would be used to connect the underground portion to existing overhead line terminals at Oakland X Substation. Additionally, the rebuild would include the installation of optical ground wire on aboveground structures with a communication cable continuing within the underground portion.

The CPUC is the lead agency responsible for environmental review of the project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq.

Document Availability: For electronic access to the NOP (in addition to the attached document PDF), please check the project website at the link below.

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

Thank you for your interest in the project.

Sincerely,
The MOX EIR Team

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Richard Massiatt <rmassiatt@muwekma.org>
Sent: Wednesday, February 26, 2025 7:55 PM
To: Sharon Heesh; Tharon.Wright@cpuc.ca.gov
Subject: Re: PG&E Moraga-Oakland X 115 kV Rebuild Project - Notice of Preparation of a Draft EIR

Unfortunately we will not be able to assist with this project at this time ,sorry for any inconvenience .

Best regards,

Richard Massiatt
Executive Director
Muwekma Ohlone Tribe of the San Francisco Bay Area
(209) 3 21-0372
Rmassiatt@muwekma.org



From: Sharon Heesh <sharonh@aspenerg.com>
Sent: Tuesday, February 25, 2025 2:22 PM
To: Tharon.Wright@cpuc.ca.gov <Tharon.Wright@cpuc.ca.gov>
Subject: PG&E Moraga-Oakland X 115 kV Rebuild Project - Notice of Preparation of a Draft EIR

Dear Interested Parties,

The California Public Utilities Commission (CPUC) has published the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for Pacific Gas and Electric Company's (PG&E's) Moraga-Oakland X (MOX) 115 Kilovolt (kV) Rebuild Project (Project). The attached NOP includes a description of the proposed Project, environmental effects that have been identified thus far for consideration in the EIR, and details on the 30-day scoping period. Written scoping comments must be submitted via email by March 27, 2025, for inclusion in the Draft EIR to MOX@aspenerg.com.

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Virtual Scoping Meetings – Thursday March 13, 2025

2:30 to 4:00 p.m. Attend by Zoom: https://us02web.zoom.us/j/84175864740	5:30 to 7:00 p.m. Attend by Zoom: https://us02web.zoom.us/j/82814611227
Attend by Phone: (669) 4 44-9171 then enter Webinar ID: 841 7586 4740	Attend by Phone: (669) 900-6833 then enter Webinar ID: 828 1461 1227

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Document Availability: For electronic access to the NOP (in addition to the attached document PDF), please check the project website at the link below.

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

Thank you for your interest in the project.

Sincerely,
The MOX EIR Team

STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

February 27, 2025

Tharon Wright
 California Public Utilities Commission
 300 Capitol Mall
 Suite 500
 Sacramento CA 95814

Re: 2025020944 PG&E Moraga-Oakland X 115 Kilovolt Rebuild Project, Contra Costa and Alameda Counties

Dear Ms. Wright:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.



CHAIRPERSON
Reginald Pagaling
 Chumash

VICE-CHAIRPERSON
Buffy McQuillen
 Yokayo Pomo, Yuki,
 Nomlaki

SECRETARY
Sara Dutschke
 Miwok

PARLIAMENTARIAN
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COMMISSIONER
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Reid Milanovich
 Cahuilla

COMMISSIONER
Bennae Calac
 Pauma-Yuima Band of
 Luiseño Indians

COMMISSIONER
Vacant

ACTING EXECUTIVE
 SECRETARY
Steven Quinn

NAHC HEADQUARTERS
 1550 Harbor Boulevard
 Suite 100
 West Sacramento,
 California 95691
 (916) 373-3710
nahc@nahc.ca.gov

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

- b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agree substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
- c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a s by reques must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information conce Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for cons project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally af
- c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: K Marshall <klmarshall7@yahoo.com>
Sent: Friday, February 28, 2025 9:48 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X Project

Hi, I'd like to see more of the overhead lines moved to be underground. The majority of this line is being kept above ground in the current plan.

Kathryn

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Elizabeth Hansell <joey.hansell@gmail.com>
Sent: Friday, February 28, 2025 2:05 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X project

I live in the Oakland Hills near this transmission line and it is an issue because of our fire risk.

Elizabeth Hansell

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Barbara Rosenfeld <jdorchid@me.com>
Sent: Monday, March 3, 2025 9:06 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: OfficeOfTheMayor@oaklandca.gov; Undergrounding Montclair; Montclair PGETowers;
District4@oaklandca.gov
Subject: Support for Undergrounding All Electrical Wires in "Very High" Fire Severity Danger Zones
Attachments: CPUC.docx

BARBARA L. ROSENFELD

1965 Asilomar Drive

Oakland, CA. 94611

Tel. 510-817-4869

Cell: 310-709-4329

E-mail: jdorchid@me.com

Email: MOX@aspeneg.com

March 3, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: **Support for Undergrounding All Electrical Wires in “Very High” Fire Danger Areas**

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission’s (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company’s (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to mandate undergrounding all electrical lines for this and future projects, in regions designated as “very high” fire danger severity zones. Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners’ insurance crisis, consistent with SB 884.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks and redirect investment into new technology.

PGE acknowledges in its Wildfire Risk Mitigation that: “When a line is underground, we reduce nearly all wildfire ignition risk in that location.” PGE has mitigated other “very high” fire risks with undergrounding, and acknowledges current capacity, safety, reliability and longevity issues. Updated technology (undergrounding) provides the opportunity to improve service to customers, public safety and esthetics.

Undergrounding would also address PGE’s justification of its March rate increase - due to the cost of tree pruning. Undergrounding eliminates a huge recurring financial, environmental and esthetic cost. Ratepayers are entitled to a responsible use of their funds, and a forward-looking utility provider.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in “very high” fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in SB 884. Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Barbara L Rosenfeld

CC: Governor Newsom

Mayor Jenkins

Senator Arrequin

Assemblymember Wicks

Councilmember Ramachadran

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: carole lehrman <carolelehrman@yahoo.com>
Sent: Monday, March 3, 2025 4:19 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: support for underground wires

Dear MOX EIR Team,

My husband and I moved to 1957 Asilomar Drive a little over a year ago. We moved from Great Neck, New York to be closer to family.

We love our neighborhood and our home but there is an however. I have never seen as many wires as we have in our area. The last time I saw this many unsightly and dangerous wires was in Viet Nam.

I watch PG&E commercials saying how much work they're doing and how safe they're making things and I find myself yelling at the TV. Not here - you're not making things safe.

There was a terrible fire in Oakland and many people died. What will it take to fix the wires so we can feel safe!

I am paying three times what I paid in a wealthy Long Island community where I didn't have solar panels. I have them here and I'm paying triple the amount to PG&E. What for? If the company can't make residents feel safe, what are we paying for?

This is inexcusable!

Sincerely yours,
Carole Lehrman

1957 Asilomar Drive
Oakland, Ca. 94611
Cell: 9173645004
Carolelehrman@yahoo.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Jennifer Arnest <jmarnest@gmail.com>
Sent: Tuesday, March 4, 2025 1:28 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: Martin Arnest
Subject: Support for Undergrounding All Electrical Wires in Oakland Hills High Fire Danger Areas

March 3, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that **a more comprehensive solution is necessary to protect both communities and the environment.** Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the **standard practice for all power line rebuilds** in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. Of course this is personal for us, as we lived through the Hills fire in the 90's, and also, our current home in Montclair sits so close to so many power lines, in fact one that sits directly on our property; however, it is the total loss of community that concerns us the very most when the next fire comes to the hills of Oakland, and it will. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Jennifer Arnest
2370 Scout Rd
Oakland, CA. 94611
415-572-5370
jmarnest@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: SusanLandon <susanlandon@aol.com>
Sent: Tuesday, March 4, 2025 12:21 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Underground All electrical wires in Very High Fire Danger Areas

Email: MOX@aspeneg.com March 4, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: Support for Undergrounding All Electrical Wires in “Very High” Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission’s (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company’s (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

The Montclair region has already seen the rapid and devastating effects of the Tunnel fire in 1991 where a large portion of the neighborhood burned in a matter of minutes or hours resulting in 25 deaths, 150 injuries and the loss of over 3000 homes. As a former consultant to the CPUC, I know how decisions can be made using maps and not by actual on site inspection. This very high fire danger severity zone calls for mandatory undergrounding of all electrical lines for this and future projects. Had careful onsite inspections taken place, I have no doubt undergrounding all- not just a small portion- of this project would have been included in the proposed design.

Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners’ insurance crisis, consistent with SB 884.

While the proposed MOX Project includes a small segment of underground lines, a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks and redirect investment into new technology.

PGE acknowledges in its Wildfire Risk Mitigation that: “When a line is underground, we reduce nearly all wildfire ignition risk in that location.” PGE has mitigated other “very high” fire risks with undergrounding, and acknowledges current capacity,

safety, reliability and longevity issues. Updated technology (undergrounding) provides the opportunity to improve service to customers, public safety and esthetics.

Undergrounding would also address PGE's justification of its March rate increase - due to the cost of tree pruning. Undergrounding eliminates a huge recurring financial, environmental and esthetic cost. Ratepayers are entitled to a responsible use of their funds, and a forward-looking utility provider.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in "very high" fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in SB 884. Thank you for considering this critical issue. Stronger commitments to wildfire risk reduction in the environmental review process is essential.

Susan Landon
241 Pershing Drive
Oakland, Ca 94611
206-369-1947

Sent from my iPhone

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: alice.gillen@icloud.com
Sent: Friday, March 7, 2025 9:30 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas - Moraga-Oakland X
Attachments: Support for Undergrounding All Electrical Wires in High Fire Danger Areas.docx

To whom it may concern,

Please see attached a letter outlining my support for undergrounding all electrical wires in high fire areas in the Morago-Oakland X (MOX) rebuild project.

If you have any questions or request further information, please do not hesitate to reach out to me.

Kind regards,
Alice

Email: MOX@aspeneg.com
Ms. Tharon Wright, CPUC Project Manager

March 7, 2025

Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to mandate undergrounding all electrical lines for this and future projects, in regions designated as high fire danger severity zones. As climate change drives up the severity and frequency of wildfires, it is important to take necessary steps to reduce the likelihood of catastrophic events. Undergrounding powerlines almost completely eliminates the risk of wildfire ignition from electrical equipment in a given location, which is crucial for protecting communities in these high-risk areas. PGE also acknowledges this in its Wildfire Risk Mitigation that: "When a line is underground, we reduce nearly all wildfire ignition risk in that location." PGE has mitigated other "very high" fire risks with undergrounding, and acknowledges current capacity, safety, reliability and longevity issues.

Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners' insurance crisis, consistent with SB 884. It is time that we think beyond the immediate 'cheapest fix' and look to implement infrastructure that is more resilient and will have a greater long-term return on investment.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. Buried power lines are less susceptible to damage from any extreme weather event, resulting in reduced outages and improved service reliability.

While the additional investment may be increased, undergrounding can lower maintenance and operating costs over time. This includes the reduced need for ongoing vegetation management, such as tree pruning, which addresses PGE's justification for its March rate increase. Undergrounding eliminates a huge recurring financial, environmental and esthetic cost. Ratepayers are entitled to a responsible use of their funds, and a forward-looking utility provider.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in "very high" fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in

SB 884. Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Dr. Alice Gillen
2345 Scout Rd
Oakland
CA 94611

Ph: 925-623-2196

Email: alice.gillen@icloud.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Kristine Mechem <kristine.mechem@gmail.com>
Sent: Friday, March 7, 2025 2:55 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: OfficeOfTheMayor@oaklandca.gov; District4@oaklandca.gov
Subject: Support for Undergrounding

Kristine C. Mechem

2011 Asilomar Drive

Oakland, CA 94611

Phone: 415.706.2211

E-mail: kristine.mechem@gmail.com

Email: MOX@aspeneg.com

March 6, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: Support for Undergrounding All Electrical Wires in “Very High” Fire Danger Areas

Dear Ms. Wright and Team,

This is a response to the California Public Utilities Commission’s (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company’s (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

As an Oakland Hills resident who remembers the 1991 fire, I strongly urge CPUC to mandate undergrounding all electrical lines for this and future projects, in regions designated as “very high” fire danger severity zones. Frankly, it was a miracle that more lives were not lost in the Oakland fire. Without a shift in the winds, most experts agree the fire would not have been contained. Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners’ insurance crisis, consistent with SB 884.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Protection is not only for property but for lives especially in heavily populated areas with limited egress where choke points could end in a large amount of fatalities..

Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks and redirect investment into new technology.

PGE acknowledges in its Wildfire Risk Mitigation that: “When a line is underground, we reduce nearly all wildfire ignition risk in that location.” PGE has mitigated other “very high” fire risks

with undergrounding, and acknowledges current capacity, safety, reliability and longevity issues. Updated technology (undergrounding) provides the opportunity to improve service to customers, public safety and esthetics.

Undergrounding would also address PGE's justification of its March rate increase - due to the cost of tree pruning. Additional costs driven by the aerial surveillance including drones and helicopters and the security protection that a PGE employee has in the in person surveillance. An analysis of all the costs associated with not undergrounding must clearly show that ROI of earlier undergrounding is the cost effective way to go. Undergrounding eliminates a huge recurring financial, environmental and esthetic cost. Ratepayers are entitled to a responsible use of their funds, and a forward-looking utility provider.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in "very high" fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in SB 884. Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Kristine C. Mechem

CC: Governor Newsom <https://www.gov.ca.gov/contact/>

Mayor Jenkins OfficeOfTheMayor@Oaklandca.gov

Senator Arrequin <https://sd07.senate.ca.gov/contact>

Assemblymember Wicks <https://a14.asmdc.org/email-assemblymember-wicks>

Councilmember Ramachadran District4@oaklandca.gov

--

Kristine C. Mechem

Kristine.Mechem@gmail.com

415.706.2211

[Linkedin Profile](#)

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Gerald DZENDZEL <orindavet@aol.com>
Sent: Sunday, March 9, 2025 9:46 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Re: MORAGA-Oakland X 115 kV Rebuild Project on Private Property

Hi Hedy

Thank you for getting back to me. Yes I would like to encourage the removal of the towers especially the ones that border residential areas. There could be the double benefit of having a fire break, if a fire road was maintained on top of where the lines were under grounded, and you wouldn't have the risk of fires starting in the dry grass below the power lines like occurred during the Oakland hills fire.

I look forward to the Zoom meeting

Gerry Dzendzel
 18 Snow Court Orinda

Sent from my iPad

On Mar 5, 2025, at 3:48 PM, PG&E Moraga-Oakland X 115 kV Rebuild Project <MOX@aspeneg.com> wrote:

>

Dear Mr. Dzendzel,

My apologies for the delay in getting back to you. We had an issue with the email account settings that has now been resolved. >

The California Public Utilities Commission (CPUC) is just beginning its environmental review process for PG&E's proposed Moraga-Oakland X (MOX) 115 Kilovolt Rebuild Project under the California Environmental Quality Act (CEQA).

>

Up to date information on the project, its schedule, the CPUC project manager, and status of CEQA environmental review can be found on the CPUC's MOX Project website at the link below. The CPUC's MOX Project website also includes PG&E's "Proponent's Environmental Assessment (PEA)," which has detailed figures showing existing and proposed structure locations (see PEA Figure 3.5-1, sheets 1 through 25).

>

>

<https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fia.cpuc.ca.gov%2Fenvironment%2Finfo%2Faspen%2Fmoraga-oakland%2Fmoraga-oakland.htm&data=05%7C02%7CMOX%40aspeneg.com%7Cee0df42594b34685d97008dd5f8e8ed8%7Cf56a45392d8e4b0d8454a64203aa39d3%7C0%7C0%7C638771788079677067%7CUnknown%7CTWFPbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOilwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOLjoiTWFPbClldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=l16S7jm3HrDAXH0Z8E%2FUvFMfaZepXK4uxmsWICU%2BjDw%3D&reserved=0>

>

Right now, the CPUC is in a 30-day scoping period until March 27, 2025, soliciting input from the public on the scope of the environmental analysis. More information on the CEQA scoping period is included in the attached Notice of Preparation. If you would like to submit a scoping comment regarding your wildfire and/or tower siting concerns and preference for an underground line, the CPUC will incorporate it into the Draft Environmental Impact Report (EIR), expected to be published this summer. We will also add your email address to our project list for future notifications.

>

During the scoping period, the CPUC will also be holding two virtual (Zoom) project scoping meetings on March 13, 2025, to obtain input from agencies and the public on the scope and content of the EIR at:

>

Virtual Scoping Meetings - Thursday March 13, 2025 2:30 to 4:00 p.m.

> Attend by Zoom:

>

<https://nam02.safelinks.protec>

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> Attend by Phone:

> (669) 444-9171 then enter

> Webinar ID: 841 7586 4740

5:30 to 7:00 p.m.

> Attend by Zoom:

>

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2F7qr97pDX7lgx0jQdbCiIdNFxC9wswnc%3D&reserved=0

2F7qr97pDX7lgx0jQdbCiIdNFxC9wswnc%3D&reserved=0

> Attend by Phone:

> (669) 900-6833 then enter

We look forward to your participation in the CEQA process. Thanks,

> Hedy Koczwar

> Aspen Environmental Group

> MOX EIR Team

> -----Original Message-----

> From: Gerald DZENDZEL <orindavet@aol.com>

> Sent: Sunday, December 15, 2024 3:50 PM

> To: PG&E Moraga-Oakland X 115 kV Rebuild Project <MOX@aspeneg.com>

> Subject: MORAGA-Oakland X 115 kV Rebuild Project on Private Property

> Dear CPUC >

> I have made multiple attempts to contact PGE about this rebuild project and they referred me to you. I am trying to make sure when the rebuild is done they remove the towers from my property and underground the lines in a way that will minimize the risk of wildfires. Can you please direct me to the persons in charge of this project review? >

> Thank you,

>

> Gerald Dzendzel

> 18 Snow Court

> Orinda, California

> Ph 925-818-0212

>> >>>>>>

<PGE MOX Project NOP (2-25-25).pdf>



STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

Pacific Gas and Electric Company's Moraga-Oakland X 115 kV Rebuild Project

Application [A.24-11-005](#), filed November 15, 2024



These files are in Portable Document Format (PDF). To view them, you will need to download the free [Adobe Acrobat Reader](#) if it is not already installed on your PC. **Note:** For best results in displaying the largest files (see sizes shown in parentheses below for files larger than 5 MB), right-click the file's link, click "Save Target As" to download the file to a folder on your hard drive, then browse to that folder and double-click the downloaded file to open it in Acrobat.

This page was last updated: February 2025

****Public Scoping is underway until March 27, 2025. Please see below for information on upcoming virtual scoping meetings and how to provide public comments****

Welcome to the California Public Utilities Commission (CPUC) website for the environmental review of Pacific Gas and Electric Company's (PG&E's) Moraga-Oakland X 115 kV Rebuild Project (MOX Project).

The Project is located in in the City of Orinda, unincorporated areas of Contra Costa County, and the cities of Oakland and Piedmont within Alameda County, California; a map is provided [here](#). PG&E submitted a Permit to Construct (PTC) application for the Project to the CPUC on November 15, 2024 ([Application A.24-11-005](#)). If approved by the CPUC, the Project is anticipated to begin construction in August 2028. The estimated Project completion date is July 2031.

The proposed Project will be reviewed under the California Environmental Quality Act (CEQA). The CPUC will prepare a CEQA environmental document as the CEQA lead agency. This website provides access to public documents and information relevant to the CEQA environmental review process. An overview of the proposed Project is provided below:



CPUC Review Process

Click [here](#) for more information about the CPUC's decision and review process.

Click [here](#) for CPUC's Proceeding page.

For additional information on the CPUC proceeding, contact the [Public Advisor's Office](#).

DESCRIPTION OF THE PROPOSED PROJECT

According to PG&E, the purpose of the Project is to replace power line equipment that has reached the end of its useful life for safe operation of the lines. The objectives of the project are:

- Provide lifecycle updates of Moraga–Oakland X 115 kV four circuit power line path by removing and replacing four circuits to avoid future reliability issues while maintaining safe operations.
- Replace four project power line circuits using a larger size conductor that will accommodate the region's reasonably foreseeable future energy demands.
- Ensure the project at completion meets power line reliability and safety requirements, and industry standards.
- Construct a safe, economical, and technically feasible project that minimizes environmental and community impacts.

The Project would involve proposed upgrades to approximately 5-miles of four overhead 115 kV power lines between Moraga and Oakland X substations in the City of Orinda, unincorporated areas of Contra Costa County, and the cities of Oakland and Piedmont within Alameda County. The two existing parallel double-circuit power lines are located within existing PG&E land rights, and the Project would rebuild the four overhead lines into four hybrid lines, with both overhead (~4 miles) and underground (~1 mile) segments.

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 line. Double-circuit transition structures would be used to connect the underground portion to existing overhead line terminals at Oakland X Substation. Additionally, the rebuild would include the installation of optical ground wire on aboveground structures with a communication cable continuing within the underground portion.

Detail of PG&E's proposal is provided in Chapter 3 of PG&E's [Proponent's Environmental Assessment \(PEA\)](#).

PG&E's Community Wildfire Safety Program

A link for more information on PG&E's Community Wildfire Safety Program, including its Wildfire Mitigation Plan, can be found [here](#). Work under the Program is independent of the proposed Project and includes undergrounding powerlines; system hardening; enhancing powerline safety settings; reducing impacts from Public Safety Power Shutoffs; and managing trees and vegetation near powerlines.

ENVIRONMENTAL REVIEW

As the CEQA Lead Agency, the CPUC will prepare an EIR to evaluate the environmental effects of the proposed project. The following table includes estimated milestones and anticipated dates for the CEQA review process.

Project Milestones as of February 2025

Milestone	Date
Application and PEA submitted by PG&E to CPUC	November 15, 2024

Application Determined Complete by CPUC	December 12, 2024
Notice of Preparation of EIR and Scoping	February 25, 2025 – March 27, 2025
Publication of Draft EIR	2nd Quarter 2025
Public Review of Draft EIR	3rd Quarter 2025
Publication of Final EIR	4th Quarter 2025
CPUC Certification of Final EIR and CPUC Decision	1st Quarter 2026
Start of Construction	Anticipated 2028 to 2030*

* Pre-construction mitigation compliance and ministerial permitting to occur between project approval and PG&E's start of construction.

Proponent's Environmental Assessment (PEA) and Application

PG&E filed an [application](#) and [PEA](#) for the MOX Project on November 15, 2024.

CPUC Application Review, Data Requests, and Applicant Responses

The CPUC has reviewed PG&E's application and PEA, and on December 12, 2024, determined that the application and PEA are complete. The CPUC submitted the following data requests to PG&E regarding their application information.

CPUC Completeness Letter and Data Request 1	PG&E Response to Data Request 1; Data Request 1 - Figures
CPUC Data Request 2	PG&E Response to Data Request 2; Data Request 2 AES-2 Figures
CPUC Data Request 3	PG&E Response to Data Request #3
CPUC Data Request 4	
CPUC Data Request 5	

Project Scoping

The CPUC has prepared a Notice of Preparation (NOP) for an EIR for the Project to solicit agency and public input on the scope of the EIR. The NOP may be viewed [here](#). During the scoping period, beginning February 25, 2025, and ending March 27, 2025, all interested parties, including responsible and trustee agencies, groups, and the public, are invited to provide input on the scope of the EIR.

The CPUC will hold two virtual public scoping meetings during a 30-day public comment period to obtain input from agencies and the public on the scope and content of the EIR.

VIRTUAL SCOPING MEETINGS – THURSDAY MARCH 13, 2025	
2:30 to 4:00 p.m. Attend by Zoom: https://us02web.zoom.us/j/84175864740 Attend by Phone: (669) 444-9171 then enter Webinar ID: 841 7586 4740	5:30 to 7:00 p.m. Attend by Zoom: https://us02web.zoom.us/j/82814611227 Attend by Phone: (669) 900-6833 then enter Webinar ID: 828 1461 1227

The CPUC's CEQA scoping comment period ends on March 27, 2025. During the comment period you may submit comments on the scope and content of the document verbally at the virtual public meetings noted above or by electronic mail to MOX@aspeneg.com.

Preparation of the CEQA Environmental Document

The environmental review process for the MOX Project is underway, and the CEQA environmental document is being prepared. The CEQA environmental document is expected to be published in mid-2025.

COMMENTS & QUESTIONS

If you have comments, complaints, or questions regarding the Project, please contact us using the CPUC's MOX Project email or leave a message on the Project voicemail, as follows:

Project e-mail: MOX@aspeneg.com
Project voicemail: 877-225-2127

The CPUC's Project Manager is:
Tharon Wright, CPUC Project Manager
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 967
San Francisco, CA 94104-2920

WEBSITE INFO

This page contains tables and is best viewed with Firefox or Internet Explorer. Please report any problems to the [Energy Division web coordinator](#).

Project Home Page - [CPUC Environmental Information](#) - [CPUC Home](#)

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Andrew Cohen <drandrewcohen@gmail.com>
Sent: Monday, March 10, 2025 10:16 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Letter re MOX

Andrew Cohen
5984 Zinn Dr
Oakland, CA 94611
DrAndrewCohen@gmail.com
415-420-4964

March 10, 2025

Ms. Tharon Wright
CPUC Project Manager

Subject: Support for Undergrounding All Electrical Wires in “Very High” Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission’s (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company’s (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

As a resident of Oakland, I strongly urge the CPUC to mandate undergrounding all electrical lines for this and future projects in regions designated as “very high” fire danger severity zones. The devastating impact of recent wildfires has made it clear that overhead power lines pose an unacceptable risk to public safety, property, and the environment. These fires not only result in tragic losses but also exacerbate the ongoing homeowners’ insurance crisis, aligning with the concerns outlined in SB 884.

While I acknowledge that the proposed MOX Project includes a small segment of underground lines, a more comprehensive approach is necessary to protect our communities. Although undergrounding power lines requires a greater upfront investment, the long-term benefits—including wildfire risk reduction, improved grid reliability, and enhanced public safety—far outweigh the costs. Given the increasing frequency and severity of wildfires in California, we must proactively implement infrastructure solutions that prioritize resilience and sustainability.

PG&E itself recognizes in its Wildfire Risk Mitigation Plan that undergrounding nearly eliminates wildfire ignition risk. The company has already used undergrounding in other high-risk areas and acknowledges the safety, reliability, and longevity benefits of updated

technology. Additionally, transitioning to underground lines would mitigate PG&E's justification for its March rate increase, which was attributed to ongoing tree pruning costs. Eliminating the need for extensive vegetation management would provide financial, environmental, and aesthetic advantages while ensuring ratepayers' funds are used responsibly.

I urge the CPUC to make undergrounding the standard practice for all power line rebuilds in "very high" fire risk zones including Montclair. This step is essential for creating a safer, more resilient energy infrastructure that aligns with the intent of SB 884. Thank you for your consideration, and I look forward to seeing a stronger commitment to wildfire risk reduction in the environmental review process.

Sincerely,

Andrew Cohen

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: rlucaswidrio@aol.com
Sent: Monday, March 10, 2025 11:25 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,
Rich Lucas
rlucaswidrio@aol.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: wanda heffernon <wmahnokini@gmail.com>
Sent: Monday, March 10, 2025 11:29 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge the CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge the CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,
Wanda Mahnokini
wmahnokini@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Jim Gardia <jimgardia@gmail.com>
Sent: Tuesday, March 11, 2025 8:20 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in "Very High" Fire Danger Areas

Ms. Tharon Wright

CPUC Project Manager

Subject: Support for Undergrounding All Electrical Wires in "Very High" Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

As a resident of Oakland, especially in the hills, I strongly urge the CPUC to mandate undergrounding all electrical lines for this and future projects in regions designated as "very high" fire danger severity zones. The devastating impact of recent wildfires has made it clear that overhead power lines pose an unacceptable risk to public safety, property, and the environment. These fires not only result in tragic losses but also exacerbate the ongoing homeowners' insurance crisis, aligning with the concerns outlined in SB 884.

While I acknowledge that the proposed MOX Project includes a small segment of underground lines, a more comprehensive approach is necessary to protect our communities. Although undergrounding power lines requires a greater upfront investment, the long-term benefits—including wildfire risk reduction, improved grid reliability, and enhanced public safety—far outweigh the costs. Given the increasing frequency and severity of wildfires in California, we must proactively implement infrastructure solutions that prioritize resilience and sustainability.

PG&E itself recognizes in its Wildfire Risk Mitigation Plan that undergrounding nearly eliminates wildfire ignition risk. The company has already used undergrounding in other high-risk areas and acknowledges the safety, reliability, and longevity benefits of updated technology. Additionally, transitioning to underground lines would mitigate PG&E's justification for its March rate increase, which was attributed to ongoing tree pruning costs. Eliminating the need for extensive vegetation management would provide financial, environmental, and aesthetic advantages while ensuring ratepayers' funds are used responsibly.

I urge the CPUC to make undergrounding the standard practice for all power line rebuilds in "very high" fire risk zones including Montclair. This step is essential for

creating a safer, more resilient energy infrastructure that aligns with the intent of SB 884. Thank you for your consideration, and I look forward to seeing a stronger commitment to wildfire risk reduction in the environmental review process.

Best regards,

Jim Gardia

5934 Zinn Dr

Oakland, Ca 94611

Jimgardia@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Roger Davies <roger@viravista.com>
Sent: Thursday, March 13, 2025 6:30 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: PG&E Moraga-Oakland X 115 kV Rebuild

Hello

I have attended two meetings for this project and fully support as much undergrounding as possible.

I live along the section of the line that is planned to be undergrounded along Park Blvd. We have a neighborhood group, and they are all in favor of doing this as soon as we can. We understand that this section is being underground because it's cheaper than trying to rebuild due to access conditions. But, even if costs were higher, it makes absolute sense to do this.

Each year, we have PG&E crews coming out and chopping and deforming trees on our property that they say are too close to the lines. Some of these are being clear-cut, which we are concerned will cause erosion of this very hilly area as the remaining roots rot, causing landslides onto our property.

The sooner we can move these lines and restore our trees, the better.

Thank you,

Roger
Trestle Glen Neighborhood

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: jwellenk@gmail.com
Sent: Thursday, March 13, 2025 3:35 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X Project

To: Tharon Wright, CPUC

I am writing to urge officials to amend the proposed scope of PG&E's Moraga-Oakland X 115kV Transmission Line Rebuild Project to allow for undergrounding the entire length of the lines being replaced (not just those along Park Blvd). This is necessary due to the high fire danger that is present in the area between the Moraga substation and Park Blvd.

Thank you for the opportunity to provide input,

Jane Wellenkamp
Oakland hills

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Genevieve Klyce <gklyce@gmail.com>
Sent: Thursday, March 13, 2025 5:34 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Fwd:

Hello

I was listening to the webinar today - the meeting about PG & E's Moraga-Oakland X 115 kv Transmission Line Rebuild Project. I live on Sandringham Rd. in Piedmont close to Estates Drive. My family has owned this home for more than 40 years and my mom started a group called PLUG decades ago (Power Lines Under Ground), recruiting people in the community to try to compel PG & E to put the power lines underground.

I just wanted to write and express my support for this project. I am very happy to hear that this is in the works. I know there were many comments during the meeting stating that all the power lines should be placed underground, and while I believe that is probably true, I think this is a good start. I really hope this all goes through and actually happens. I will be so happy to tell my mom that it is finally happening after all these years.

Thanks,
Genevieve Klyce
231 Sandrigham Rd.

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Kevin Dalley <kevin@kelphead.org>
Sent: Saturday, March 15, 2025 5:53 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Comments on Moraga-Oakland X 115 kV Transmission Line Rebuild Project.

I request the following changes on Moraga-Oakland X 115 kV Transmission Line Rebuild Project.

PGE's currently plan only has undergrounding from Park Blvd and Estates Drive to substation X; the current route for these transmission lines runs through residential neighborhoods in Oakland and Piedmont.

While this is a good first step, Oakland should look at PGE's alternative, rejected, plans, which underground lines currently passing through Dimond Canyon and Shepherd Canyon.

1. Adopt PGE alternative B or C, which underground the transmission lines which passes through Dimond Canyon and Shepherd Canyon, which are at high risk of fire. CPUC should clearly state the risks of keeping transmission lines above ground in fire prone areas. Please add information on the reason for rejecting alternatives B and C
2. Consult with Oakland Fire Department (OFD), both Fire Chief Covington and Fire Marshal Bryant. PGE documents verify that the Piedmont Fire Department has been consulted, but not the Oakland Fire Department. When OFD is consulted, include a discussion of alternative B and C, which underground the transmission lines in Dimond Canyon and Shepherd Canyon, both areas at high risk of fire.

Alternatives B, C are included in this document:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M546/K456/546456398.PDF>

Kevin Dalley
510-388-1484
3744 Glen Park Rd
Oakland, CA 94602

(my home is a few blocks from the Oakland X substation, and also a few blocks from fire prone Dimond Canyon.

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Joyce Huh <joyce@domhuh.com>
Sent: Sunday, March 16, 2025 9:28 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in that will help prevent future tragedies.

Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,
Joyce Domanico-Huh
6825 Oakwood Dr Oakland CA 94611
408-318-1332

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Bernie <bernie@cappelli.biz>
Sent: Sunday, March 16, 2025 8:50 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Adopt Plan B or Plan C

A fire in Lafayette's hills could easily jump to my neighborhood.
I request the following changes on Moraga-Oakland X 115 kV Transmission Line Rebuild Project.

PGE's currently plan only has undergrounding from Park Blvd and Estates Drive to substation X; the current route for these transmission lines runs through residential neighborhoods in Oakland and Piedmont.

While this is a good first step, Oakland should look at PGE's alternative, rejected, plans, which underground lines currently passing through Dimond Canyon and Shepherd Canyon.

1. Adopt PGE alternative B or C, which underground the transmission lines which pass through Dimond Canyon and Shepherd Canyon, which are at high risk of fire. CPUC should clearly state the risks of keeping transmission lines above ground in fire prone areas. Please add information on the reason for rejecting alternatives B and C
2. Consult with Oakland Fire Department (OFD), both Fire Chief Covington and Fire Marshal Bryant. PGE documents verify that the Piedmont Fire Department has been consulted, but not the Oakland Fire Department. When OFD is consulted, include a discussion of alternative B and C, which underground the transmission lines in Dimond Canyon and Shepherd Canyon, both areas at high risk of fire.

Alternatives B, C are included in this document:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M546/K456/546456398.PDF>

Sincerely,
Bernard Cappelli
224 El Toyonal
Orinda CA 94563

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Cybele MacHardy <cybelemac@gmail.com>
Sent: Monday, March 17, 2025 7:44 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project;
ann.oleary@gov.ca.gov; gavin.newsom@gov.ca.gov
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future

in 1991 that started in approximately the same location of this upgrade and recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety, as championed by PGE's new CEO, Patti Poppi. Europe has made these investments in their infrastructure to make people safe, why can't the richest state in the USA. And with the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,
Cybele MacHardy and
Dag Lohmann

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Deborah (Keeth) Miller <deborah.keeth@gmail.com>
Sent: Monday, March 17, 2025 10:15 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: jsavas@oaklandca.gov; rdean@oaklandca.gov;
ilmerriouns@oaklandca.gov
Subject: PG&E's proposed Moraga-Oakland X 115 kV Rebuild Project, Scoping Comments

To: Tharon Wright, CPUC
Re: Moraga-Oakland X Project, Scoping Comments

I am a homeowner at 5973 Rincon Drive, Oakland, CA 94611; I live in the community serviced by and affected by PG&E's proposed Moraga-Oakland X 115 kV Rebuild Project ("Project").

I support responsible maintenance and repair of aging PG&E infrastructure to improve system reliability and reduce hazards.

The CPUC should require PG&E to build new underground 115kV lines in the portion of the Project from approximately Estates Drive to approximately Skyline Blvd, rather than PG&E's proposal to rebuild that segment in the same (or more impactful) overhead configuration.

Increasing the amount of underground infrastructure in these areas would reduce the proposed Project's wildfire hazard and aesthetic environmental impacts. In particular:

Wildfire Hazard: The dangers of wildfire hazard as a result of overhead utility infrastructure are well-documented. PG&E's EA was prepared in November 2024 before the Los Angeles wildfires, before the state through CalFire released its map of Fire Hazard Severity Zones, and before Governor Newsom issued Executive Order N-18-25 to reduce fire risk in urban areas. PG&E's EA acknowledges that undergrounding power lines as part of the Project will "significantly reduce existing modeled wildfire risk" (see EA at 1-2; EA at 4-5 ["underground routes would reduce wildfire risk"]; Table 4.2-1 [Manzanita-Colton-Estates, and Shepherd Canyon Underground alternatives "reduces permanent ... wildfire impacts compared to the [PG&E proposed] project."]). CPUC should consider this information as it conducts its analysis under CEQA of PG&E's proposed Project, and insist that PG&E reduce wildfire hazard to the maximum extent possible through underground infrastructure.

Aesthetic: PG&E's proposed Project would result in significant and unmitigated aesthetic impacts. For example, according to Table 3.3-4 certain proposed structures would increase in height more than 60 feet compared to the existing condition -- in some cases a more than 89% height change. By contrast, undergrounding the infrastructure would substantially improve the aesthetic impacts of the project. PG&E's photo comparisons in its EA are compelling -- Figure 5.1-6a vs. 5.1-6b, Figures 5.1-16a vs. 5.1-16b, and Figures 5.1-17a vs. 5.1-17b illustrate the vast improvement in aesthetic impacts when infrastructure is removed or undergrounded, whereas Figures 5.1-8a vs. 5.1-8b or Figures 5.1-11a vs. 5.1-11b illustrate the significant aesthetic impacts when infrastructure is replaced overhead. PG&E's EA acknowledges that "underground routes would ... eliminate aesthetic impacts of aboveground structures" (see, e.g., EA at 4-5; Table 4.2-1 [Manzanita-Colton-Estates, and Shepherd Canyon Underground alternatives "reduced permanent visual ... impacts compared to the [PG&E proposed] project."]). PG&E's EA conclusion that impacts on aesthetic resources would be less than significant is not supported and not credible.

Economic and Technical Feasibility: PG&E's EA discounts the underground alternative because "extensive engineering and constructability issues that may make this alternative not economically or technically feasible" (see EA at Table 4.2-1 [emphasis added]). PG&E's own language indicates that it has not fully evaluated the feasibility of undergrounding under CEQA Section 15364.

PG&E's statement that "most" alternatives "had significant technical and economic feasibility issues" (see,

e.g., EA at 1-2, 4-8, 4-16, 4-19) is conclusory and not supported by PG&E's own document. The EA provides no quantitative assessment or objective standards to evaluate feasibility. Moreover, any assessment of economic feasibility of an undergrounding alternative must be made in comparison to the full economic impacts of not undergrounding, including

(a) PG&E's exposure to liability for massive damages from catastrophic wildfire caused by the utility's preference to build above ground infrastructure in this dense urban environment; and (b) PG&E's transfer of economic harm to the surrounding community (including through loss of ability to obtain homeowner's insurance).

I find PG&E's EA's discussion and rejection of the underground alternatives to be cursory; PG&E did not meaningfully consider the underground alternative in this segment of the project. For example, PG&E's EA does not adequately explain why it rejected (or did not consider) the alternative to underground infrastructure: (a) in Park Boulevard between SR 13 and Estates Drive, (b) Mountain Blvd from SR 13 to Shepherd Canyon Road, and (c) Shepherd Canyon Road from Mountain Blvd to approximately Saroni Drive.

I look forward to CPUC's serious consideration of the above factors as it considers PG&E's proposed project and CPUC's obligations under CEQA.

Respectfully,

Deborah Miller
5973 Rincon Drive
Oakland, CA 94611
deborah.keeth@gmail.com

cc: Janani Ramachandran's Office, and City Council District 4



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Fire Hazard Severity Zones

California’s seasonally dry Mediterranean climate lends itself to wildfires, and in an effort to better prepare, CAL FIRE is required to classify the severity of fire hazard in areas of California.

The History of Fire Hazard Severity Zone Maps



The History of Fire Hazard Severity Zone Maps

Fire Hazard Severity Zone maps arose from major destructive fires, prompting the recognition of these areas and strategies to reduce wildfire risks. Legislative response led to mandated mapping across California under the California Public Resources Code 4201-4204, encompassing all State Responsibility Areas (SRA).

What Are Fire Hazard Severity Zones?



What are Fire Hazard Severity Zones?

The State Fire Marshal is mandated to classify lands within State Responsibility Areas into Fire Hazard Severity Zones (FHSZ). Fire Hazard Severity Zones fall into one of the following classifications:

- Moderate
- High
- Very High

The California laws that require Fire Hazard Severity Zones include California Public Resources Code 4201-4204, California Code of Regulations Title 14, Section 1280 and California Government Code 51175-89.

Fire Hazard Severity Zones - Frequently Asked Questions



Frequently Asked Question

FAQ DOCUMENT (PDF)

FAQ DOCUMENT (PDF) (SPANISH)

Explore Fire Hazard Severity Zones

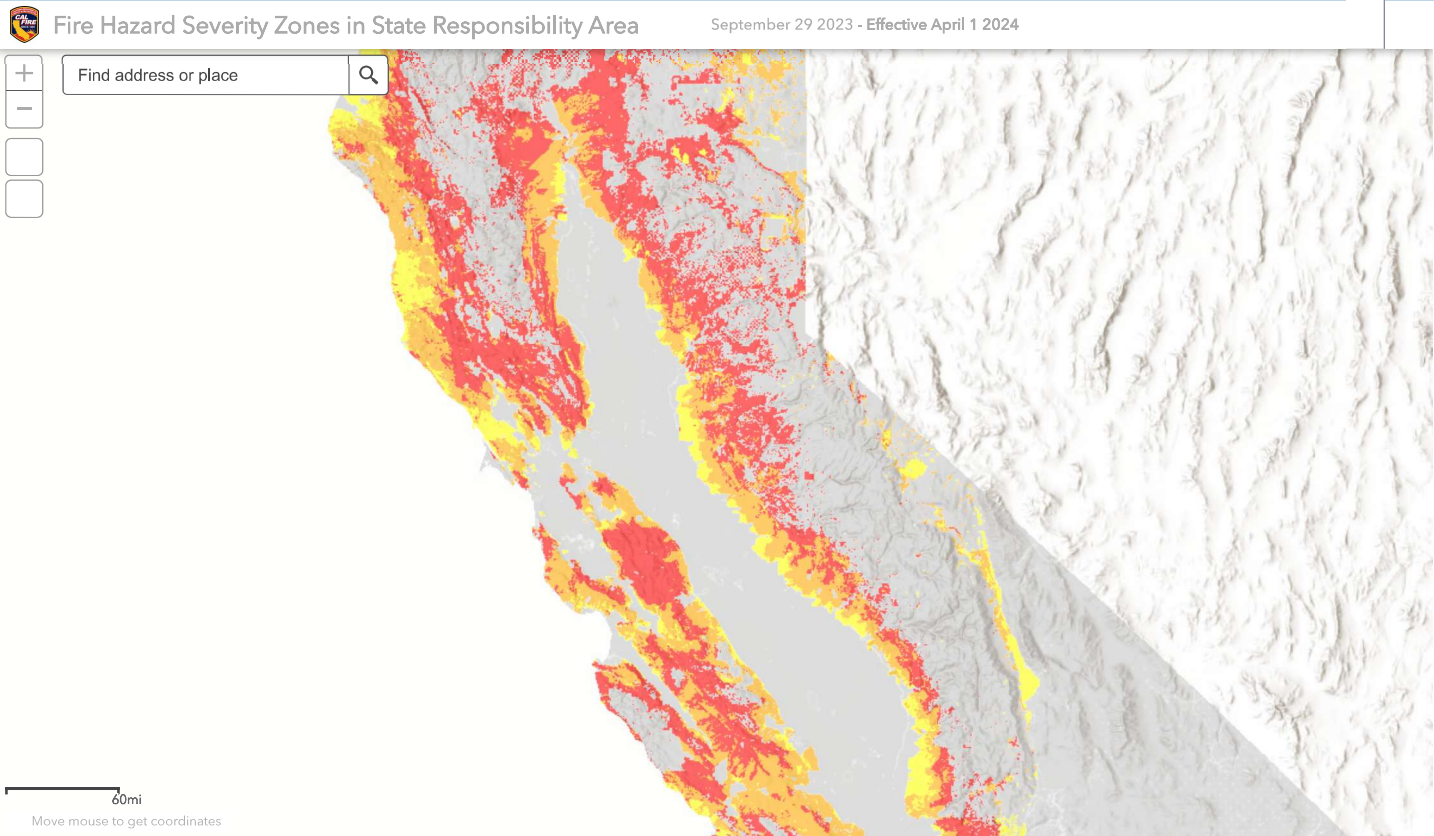
The Fire Hazard Severity Zone (FHSZ) maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. There are three levels of hazard in the State Responsibility Areas: moderate, high, and very high.

Fire Hazard Severity Zone maps evaluate “hazard,” not “risk”. They are like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

Fire Hazard Severity Zones viewer in the State Responsibility Area Effective April 1, 2024

You can enter your address to locate your property on a map showing Fire Hazard Severity Zones. Due to the nature of this content, some users who require Assistive Technology may experience accessibility issues. If you experience any problems while trying to access this content, please call the hotline at (916) 633-7655 or e-mail: FHSZinformation@fire.ca.gov.

[View Map on Cell/Tablet Device](#) 



- [SRA FHSZ Data Effective April 1, 2024](#)

Map Adoption Process

- Classification of all lands within State Responsibility Areas into fire hazard severity zones is required by law. Therefore, the fire hazard severity zone designations and accompanying maps must follow the Administrative Procedures Act (APA) and be approved by the Office of Administrative Law (OAL). The regulation can be found in Title 14 of the California Code of Regulations (CCR) section 1280.01 and entitled "Fire Hazard Severity Zones in the SRA".

Local Responsibility Area Fire Hazard Severity Zone Maps

+

State Responsibility Area Regulatory Information

+

Methods for Creating Fire Hazard Severity Zone Maps

Methods for Creating Fire Hazard Severity Zone Maps



Enhance your Property's Fire Safety

It is your responsibility to prepare yourself, your family, and your home for when wildfire strikes. Creating and maintaining [defensible space](#) and [hardening your home](#) [↗](#) by retrofitting it with ignition-resistant or noncombustible materials to protect against the threat of flying embers, direct flame contact, and radiant heat exposure will dramatically


increase your safety and the survivability of your home.

- DEFENSIBLE SPACE
- HOME HARDENING 

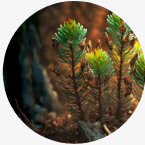
Fire Hazard Severity Zones - Call to Action



- Science and Method +
- Definitions +
- California Department of Insurance Information +



Contact Information
FHSZinformation@fire.ca.gov
916-633-7655



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Feb 6, 2025

Governor Newsom signs executive order to further prepare for future urban firestorms, stepping up already nation-leading strategies

What you need to know: Governor Newsom signed an executive order to launch key initiatives to continue adapting to future

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News

Feb 6, 2025

Governor Newsom signs executive order to further prepare for future urban firestorms, stepping up already nation-leading strategies

What you need to know: Governor Newsom signed an executive order to launch key initiatives to continue adapting to future

extreme firestorm events in urban communities and leading the way to build a more resilient state.

Sacramento, California – Adding to California’s nation-leading fire safety standards, Governor Gavin Newsom today signed an executive order to further improve community hardening and wildfire mitigation strategies to neighborhood resilience statewide. A copy of the executive order is available [here](#).

We are living in a new reality of extremes. Believe the science – and your own damn eyes: Mother Nature is changing the way we live and we must continue adapting to those changes. California’s resilience means we will keep updating our standards in the most fire-prone areas.

Governor Gavin Newsom

The executive order issued by Governor Newsom does the following:

- Directs the State Board of Forestry to accelerate its work to adopt regulations known as “Zone 0,” which will require an ember-resistant zone within 5 feet of structures located in the highest fire severity zones in the state.
- Tasks the Office of the State Fire Marshal with releasing updated Fire Hazard Severity Zone maps for areas under local government responsibility, adding 1.4 million new acres of land into the two higher tiers of fire severity, which will update building and local planning requirements for these communities statewide.
- Requires the Department of Forestry and Fire Protection (CAL FIRE) and the Governor’s Office of Emergency Services (Cal OES) to work with local, federal and tribal partners on improvements to the Federal resource ordering system for wildfire response.

Protecting homes

Science has shown that combustible material within the immediate five feet of a structure contributes the greatest risk of embers directly or indirectly igniting the home. “Zone 0” regulations under development for new and existing construction would require an ember-resistant zone within the immediate 5-feet of structures in local area Very High Fire Hazard Severity Zones in Local Responsibility Areas, and Fire Hazard Severity Zones in State Responsibility Areas.

Zone 0 regulations would move forward this year in tandem with financial assistance and relief for homeowners, proposed in the Governor's January Budget, and to be augmented by the California Conservation Corps supporting work in vulnerable communities and in coordination with local Fire Safe Councils. While it is anticipated that the regulations would apply to new construction upon taking effect, requirements for existing homes would likely be phased in over three years to allow homeowners to prepare and prioritize mitigations and secure financial assistance.

Research suggests that the cost of building a home with Zone 0 mitigations already incorporated adds little to no cost to building a comparable home without those features.

Updating fire hazard severity areas

To ensure future resiliency against urban firestorms, local government planners and developers will have to factor in wildfire-hardening requirements in building planning, design, and construction within nearly 2.3 million acres of land in areas where local governments are responsible for wildfire prevention and response, known as local responsibility areas.

The release of updated Fire Hazard Severity Zones for Local Responsibility Area maps would identify new areas where new development is required to adhere to the highest standards of wildfire resilient building codes and land-use planning. These new zones and maps would add approximately 1.4 million new acres of land into the two higher tiers of fire hazard severity. Specifically, they would expand current wildfire building resiliency requirements in the High-Fire Hazard Severity Zone to approximately 1.16 million new acres, and they would expand both current wildfire building and local planning resiliency requirements in the Very High-Fire Hazard Severity Zone to approximately 247,000 new acres.

The release of these updated zones and maps, which are expected to be released one region at a time beginning in Northern California, would begin a 120-day clock for local government jurisdictions to adopt local ordinances incorporating the State Fire Marshal's recommendations.

The release of these Local Responsibility Area maps would follow last year's release of equivalent updated zones and maps in the State Responsibility Area, and follow months of planning discussions, including consultation with insurance providers who have developed their own models to determine risk, premiums and coverage that are independent of the state's Fire Hazard Severity Zone maps.

Investing in wildfire prevention

Overall, the state has more than doubled investments in wildfire prevention and landscape resilience efforts, providing more than \$2.5 billion in wildfire resilience since 2020, with an additional \$1.5 billion from the 2024 Climate Bond to be committed beginning this year for proactive projects that protect communities from wildfire and promote healthy natural landscapes. Of note, since 2021, the State has made strategic investments in at least 61 fuels reduction projects near the Palisades and Eaton fire perimeters through projects treated over 14,500 acres.

The Newsom Administration has invested \$2 billion to support CAL FIRE operations, a 47% increase since 2018, which has helped build CAL FIRE from 5,829 positions to 10,741 in that same period, and the Administration is now implementing shorter workweeks for state firefighters to prioritize firefighter well-being while adding 2,400 additional state firefighters to CAL FIRE's ranks over the next five years.

Augmenting technological advancements and pre-deployment opportunities

The Newsom Administration has also overseen the expansion of [California's aerial firefighting fleet](#), including the addition of more than 16 helicopters with several equipped for night operations, expanded five helitack bases, and assumed ownership of seven C-130 air tankers, making it the largest fleet of its kind globally.

California is also leveraging AI-powered tools to spot fires quicker, has deployed the Fire Integrated Real-Time Intelligence System (FIRIS) to provide real-time mapping of wildfires, and has partnered with the U.S. Department of Defense to use satellites for wildfire detection and invested in LiDAR technology to create detailed 3D maps of high-risk areas, helping firefighters better understand and navigate complex terrains.

In [anticipation of severe fire weather](#) conditions in early January 2025, Cal OES approved the repositioning of 65 fire engines, as well as more than 120 additional firefighting resources and personnel in Los Angeles, Orange, Santa Barbara, Ventura, Riverside, San Bernardino, and San Diego counties, and CAL FIRE moved firefighting resources to Southern California including 45 additional engines and six hand crews to the region.

During the wildfires, California was able to mobilize [more than 16,000 personnel](#) including firefighters, National Guard servicemembers, California Highway Patrol officers and transportation teams to support the response to the Los Angeles firestorms, and more than 2,000 firefighting apparatus composed of engines, aircraft, dozers and water tenders to aid in putting out the fires.

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PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Jennifer Wilkins <jengwilks1@gmail.com>
Sent: Monday, March 17, 2025 8:50 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: llaf.esuf@asm.ca.gov; assemblymember.wicks@assembly.ca.gov;
gavin.newsom@gov.ca.gov; ann.oleary@gov.ca.gov
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

We are writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While we recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

We urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. We look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,
Jennifer and Brian Wilkins
44 Evirel Pl, Oakland, CA 94611
510-316-8991
jengwilks1@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: jun furuta <jkfuruta@sbcglobal.net>
Sent: Monday, March 17, 2025 8:32 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X 115 kV Rebuild Project

Dear Tharon Wright,

I attended the virtual scoping meeting on March 13th for the Moraga-Oakland X 115 kV Rebuild Project. I want to echo the comments of all the other attendees in my session and express my concern that the proposed rebuild only undergrounds the power lines over the lower residential areas while leaving four miles of increased capacity lines over vulnerable, high fire risk zones through Shepard Canyon and over the heavily wooded Oakland / Moraga hills.

As climate change impacts the East Bay, I have personally seen the stressed and fallen trees that have succumbed to the drier conditions in the Oakland hills. I believe it is a mistake to replace the existing infrastructure with similar towers and overhead lines in the most fire prone areas. To not underground the power lines at this retrofit opportunity risks a repeat of the 1991 Oakland hills fire over the decades long life of this rebuilt section. Please reconsider this proposal and push to underground the entire path of this retrofit, but especially over the Oakland / Moraga hills where it is most needed.

Thank you,
-Jun Furuta

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Jeni P <jenipaltiel@gmail.com>
Sent: Tuesday, March 18, 2025 10:23 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X Project

Hi -

I'm writing to add my voice to those asking you to consider undergrounding the high-voltage transmission lines that run between Moraga and Park Blvd in Oakland, rather than just replacing them with more above-ground lines.

As you probably know, Orinda-Moraga was one of the top three areas identified by state officials as being at risk of being the next Pacific Palisades-style disaster (<https://www.sfchronicle.com/politics/article/orinda-moraga-fire-risk-20036253.php>)

Living in the Oakland Hills, wildfire danger is a constant threat, and anything you can do to help mitigate that risk is crucial. Now, when you're already working on these lines, is the time to make them as safe as possible by undergrounding them.

Sincerely,
Jeni Paltiel
2173 Trafalgar Pl
Oakland CA 94611

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Rachel Colby <rachelcolby11@gmail.com>
Sent: Wednesday, March 19, 2025 9:30 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X Rebuild Project (PG&E) - Please underground power lines wherever possible

Hello,

This comment is in regards to the Moraga-Oakland X Rebuild Project proposed by PG&E. As a resident of an area with a high wildfire risk, I urge PG&E to underground power lines wherever feasible, and to take wildfire risk into account when deciding which power lines to underground. Safety is of the utmost importance and I would even be willing to endure higher costs if it would ensure that more power lines would be undergrounded and wildfire risk would be reduced.

Thank you,

Rachel Colby
4745 Lincoln Ave
Oakland, CA

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Mark Johnson <mtjohnson6547@gmail.com>
Sent: Thursday, March 20, 2025 6:52 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Moraga-Oakland X 115 Rebuild Project

To: Tharon Wright, CPUC

I am writing to urge officials to amend the proposed scope of PG&E's Moraga-Oakland X 115kV Transmission Line Rebuild Project to allow for undergrounding the entire length of the lines being replaced, not just those along Park Blvd. Doing so is critical due to the high fire risk that is present in the area between the Moraga substation and Park Blvd.

Thank you for the opportunity to provide input. If you don't mind, could you please confirm receipt of this email. Thank you.

Mark Johnson
Oakland hills resident

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Sarah Saltzer <sarahsaltzer@outlook.com>
Sent: Saturday, March 22, 2025 9:03 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Letter in support of
Attachments: Letter to CPUC.docx

MOX EIR Team,

Please see attached letter in support of undergrounding PGE lines.

Sarah Saltzer

Sarah D. Saltzer
1989 Asilomar Drive
Oakland, CA. 94611
Cell: 925-785-4940
E-mail: sarahsaltzer@outlook.com

Email: MOX@aspeneg.com

March 22, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: **Support for Undergrounding All Electrical Wires in “Very High” Fire Danger Areas**

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission’s (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company’s (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I support Alternative B (Undergrounding Manzanita Drive-Colton Boulevard-Estates Drives), but strongly urge CPUC to mandate undergrounding **all** electrical lines for this and future projects, in regions designated as “very high” fire danger severity zones. Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners’ insurance crisis, consistent with SB 884.

While I recognize that the proposed MOX Project includes only a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks and redirect investment into new technology.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in “very high” fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in SB 884. Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Sarah D. Saltzer

CC: Governor Newsom
Mayor Jenkins
Senator Arrequin
Assemblymember Wicks
Councilmember Ramachadran

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Barbara Rosenfeld <jdorchid@me.com>
Sent: Tuesday, March 25, 2025 3:45 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: Montclair PGETowers; Undergrounding Montclair; Janani Ramachadran;
Erika Neal; Ilaf Esuf; Daijon Jackson
Subject: MOX REBUILD PROJECT: SUPPLEMENT TO CPUC SUBMISSION:
ALTERNATIVE B
Attachments: CPUC Supplemental Submission.pdf

Attached please find my supplemental submission.

BARBARA L. ROSENFELD

1965 Asilomar Drive

Oakland, CA. 94611

Tel. 510-817-4869

Cell: 310-709-4329

E-mail: jdorchid@mc.com

Email: MOX@aspencg.com

March 25, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: **MOX Rebuild Project: CPUC Request to Address the Alternatives**

Dear MOX EIR Team,

I am writing to supplement my response dated March 3, 2025, to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project. The CPUC specifically requested that the Alternatives be addressed.

Alternative B provides more undergrounding and thus, more public safety than the primary PGE proposal. Despite the Oakland Hills having experienced a tragic loss of 25 lives and destruction of 3,400 homes in 1991, and the passage of SB 884 in 2022, it is my understanding that the CPUC approved a 10-year undergrounding plan that omits significant portions of the Oakland Hills.

It is imperative that the omission from the 10-year plan be corrected before another devastating tragedy. In the interim, Alternative B appears to offer greater protection against fire risk.

Sincerely,



Barbara L. Rosenfeld

CC: Governor Newsom
Interim Mayor Jenkins
Senator Arrequin
Assemblymember Wicks
Councilmember Ramachadran

Undergrounding Montclair undergrounding.montclair@gmail.com

PG&E Tower Group stopthepgetowersmontclair@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Beth Wrightson <beth.wrightson@gmail.com>
Sent: Tuesday, March 25, 2025 8:02 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project <MOX@aspeneg.com>
Subject: Support for Undergrounding All Electrical Wires in "Very High" Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to mandate undergrounding all electrical lines for this and future projects, in regions designated as "very high" fire danger severity zones. Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners' insurance crisis, consistent with SB 884.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks and redirect investment into new technology.

PGE acknowledges in its Wildfire Risk Mitigation that: "When a line is underground, we reduce nearly all wildfire ignition risk in that location." PGE has mitigated other "very high" fire risks with undergrounding, and acknowledges current capacity, safety, reliability and longevity issues. Updated technology (undergrounding) provides the opportunity to improve service to customers, public safety and esthetics.

Undergrounding would also address PGE's justification of its March rate increase - due to the cost of tree pruning. Undergrounding eliminates a huge recurring financial, environmental and esthetic cost. Ratepayers are entitled to a responsible use of their funds, and a forward-looking utility provider.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in "very high" fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in SB 884. Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Beth Wrightsonn
2410 Scout Road
Oakland, CA 94611

CC: Governor Newsom
Mayor Jenkins
Senator Arrequin
Assemblymember Wicks
Councilmember Ramachadran

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: renee cameto <reneecameto321@yahoo.com>
Sent: Tuesday, March 25, 2025 5:48 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: RENEE CAMETO
Subject: MOX REBUILD PROJECT: CPUC REQUEST TO ADDRESS THE ALTERNATIVES

I AM WRITING TO COMMENT ON THE MOX REBUILD PROJECT ENVIRONMENTAL IMPACT REPORT REGARDING THE PGE MORAGA-OAKLAND X (MOX) REBUILD PROJECT ALTERNATIVES.

ALTERNATIVE B PROVIDES MORE UNDERGROUNDING AND THUS, GREATER PUBLIC SAFETY THAN THE PRIMARY PGE PROPOSAL.

THE CURRENT PLAN DOES NOT CONTAIN ENOUGH UNDERGROUNDING TO ADEQUATELY PROTECT OAKLAND. IT IS IMPERATIVE THAT THE CURRENT PLAN BE IMPROVED TO PROVIDE MAXIMUM PROTECTION FOR OAKLAND FROM WILDFIRES.

PLEASE ADOPT ALTERNATIVE B

SINCERELY,

RENEE CAMETO
5538 BALBOA DRIVE, OAKLAND, CA 94611

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: ANEDRA GUINN <anedra.guinn@comcast.net>
Sent: Wednesday, March 26, 2025 11:04 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks. While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies. Thank you for considering this critical issue. Of course this is personal for us, as we lived through the Hills fire in the 90's, and also, our current home in Montclair sits so close to so many power lines, in fact one that sits directly on our property; however, it is the total loss of community that concerns us the very most when the next fire comes to the hills of Oakland, and it will. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Anedra Guinn
510.410.4650
anedra.guinn@comcast.net

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Donna Johnke <mdjohnke@att.net>
Sent: Wednesday, March 26, 2025 3:33 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: J5LR@pge.com
Subject: Concerns over the PG&E Moraga-Oakland Transmission Line Project

Dear Ms. Wright,

I am an Orinda Resident, and have been following the planning of the Moraga-Oakland Transmission Line Rebuild Program closely. I attended the public information forum at the Orinda Community Center last spring, as well as the CPUC zoom meeting on March 13th of this year. Since that time, there are already discrepancies and new concerns that I feel PG&E needs to address.

First is the concern of planned under grounding of the lines through Piedmont. At the spring information session with PG&E, I was told by their representatives that under grounding lines were not feasible due to "seismic" concerns as well as issues with property easements, and then (as always) cost. Now we have under grounding occurring in Piedmont. This makes no sense what so ever. According to the most recent Cal Fire maps made public in February, Piedmont is in a "moderate risk zone," whereas all of Orinda is in a "very high fire risk zone". Also, as for the answer that under grounding can't happen due to earthquake risk, Piedmont is literally on the Hayward Fault line. So are all of our gas lines, which are at a much greater risk of rupturing and causing fire than underground electrical lines.

I would like an answer as to why Piedmont gets electrical lines underground, and not the areas of greatest fire risk, which are the hills that separate us?

Here is my other concern with the current plan. The PG&E reps last spring stated the new towers along the this line will be 10 feet higher than the current lines and built to withstand 85 mph winds. Obviously, outdated climate models have been used, as wind gusts over 80 mph have been clocked in the east bay hills in the past two years. PG&E commercials tell us that they are making an unprecedented effort to underground lines in high fire danger areas,
<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.youtube.com/watch%3Fv%3DAxzW6TvEv8o&ved=2ahUKEwi-0t-H3KiMAxVOHjQIHQ3yJN0QwqsBegQIDBAG&usg=AOvVaw2cJQxirrMUpt9bsIC8JVIN>,
but that is just not the case.

I am perplexed. Why wouldn't PG&E make the serious infrastructure investment for the future in an area that holds one of their largest substations, the Moraga Substation on Lost Valley Drive in Orinda? This substation supplies power to Contra Costa and Alameda counties. Its location? Smack dab in the highest risk zone according to Cal Fire.

I would like an answer as to why PG&E is not following through with their claims they are making in their public service announcements? This is a generational investment, a “bandaid” won’t do. Now is the time to invest in the future we can’t afford any less.

Why do the individual home owners have to assume all the responsibility of climate change? We are already paying higher PG&E rates, insurance payments (if we can get it) and having to spend thousands to harden our homes against fire to comply with new city, fire district and state mandates? I am happy to see PG&E step up and take maintenance and mitigation of their infrastructure seriously after years of neglect. However, more accountability needs to be placed on the utility that has been the cause of these fires to begin with.

Thank you for considering my concerns and answering my two questions. I look forward to hearing some concrete answers to my two questions.

Sincerely,

Donna Johnke
17 Lost Valley Drive
Orinda, CA 94563

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Jason Rife <jsrife@hotmail.com>
Sent: Wednesday, March 26, 2025 8:39 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: llaf.esuf@asm.ca.gov; assemblymember.wicks@assembly.ca.gov;
gavin.newsom@gov.ca.gov; ann.oleary@gov.ca.gov
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I implore CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones or near significant nature preserves, parks and adjacent residential areas. Recent devastating fires in California and other regions of the country have highlighted real and unnecessary risk posed by these transmission lines in these areas and lack of accountability and responsibility for doing what is necessary to maintain them and prevent such tragedies.

While a small portion is proposed to be underground this seems more of a PR token so be able to say a bit of money was spent to do so without actually addressing the risks.

I urge CPUC to reinvest our taxpayer and customer driven profits to prioritize undergrounding as the standard practice for all power line rebuilds in risk areas.

Thank you for considering this critical issue. I look forward to seeing stronger actions and commitments to this project.

Sincerely,
Jason Rife & Reem Malik
7410 Skyline Blvd
Oakland, CA 94611

Jason S. Rife
jsrife@hotmail.com
646.373.6849

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: John Campbell <johnwcampbell3rd@gmail.com>
Sent: Wednesday, March 26, 2025 12:42 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Ms. Tharon Wright, CPUC Project Manager Dear Ms. Wright and MOX EIR Team:
I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge the CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks. I urge the CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies. In assessing the costs involved, please consider not only the increased, unmitigated risks associated with retaining overhead lines and towers, but the substantial financial and environmental costs of vegetation management over the 100 year lifespan of overhead wiring.

Sincerely,

John and Jessica Campbell
20 Marlborough Court Piedmont
510-501-4205

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Ken Heilig <hkweilig@gmail.com>
Sent: Wednesday, March 26, 2025 6:04 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Under ground wiring now

Sent from my iPhone

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Lars Johnson <larspjohnson@gmail.com>
Sent: Wednesday, March 26, 2025 4:14 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Undergrounding power lines Oakland hills

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I urge you to highly consider undergrounding all high voltage power lines in the Oakland and Berkeley area. This area is very densely populated. I believe the 1991 fires and the recent Palacades fire in Los Angeles are reasons why we need to underground high voltage power lines in area of high fire risk.

I am a resident of Piedmont and I understand that a portion of these power lines are very near the south east boundary of Piedmont.

Thanks

Lars Johnson
Piedmont California

Sent from my iPhone

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Lisa Diamond <lisa_diamond@yahoo.com>
Sent: Wednesday, March 26, 2025 8:50 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. Of course this is personal for us, as we lived through the Hills fire in the 90's, and also, our current home in Montclair sits so close to so many power lines, in fact one that sits directly on our property; however, it is the total loss of community that concerns us the very most when the next fire comes to the hills of Oakland, and it will. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,
Lisa Diamond
Montclair resident

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Marvin Schwartz <marvschwartz@igc.org>
Sent: Wednesday, March 26, 2025 10:28 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: PG&E Moraga to Oakland line

Dear MOX EIR Team, I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project. I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks. I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Marvin Schwartz (survivor of the 1991 Oakland fire)
18 Ascot Lane (in the Oakland hills)
Oakland, CA 94611

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Cynthia Barbera <cynbarbera@gmail.com>
Sent: Thursday, March 27, 2025 2:22 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: URGENT - We must underground electric lines in Montclair High Fire Risk area!

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland (MOX) 115 kV Rebuild Project.

My family has resided in Montclair for over 70 years. Our home nearly burned in the terrible 1991 firestorm that killed 25 people, burned 3800 homes and resulted in \$3 billion in damages in today's dollars.

I strongly urge CPUC to consider undergrounding all electrical lines in the Montclair Hills area. The devastating fires in Los Angeles, the Palisades, and Altadena are yet another reminder to underscore the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the overhead power lines that exacerbates these risks.

The areas in question are not at very high risk of fire as we already have seen, but they also

Montclair area has 3 roads to safety to serve 10,000 residents. It is already perilous should a fire occur. If even one road were blocked due to a downed power line, it would be catastrophic.

Further, "hardening" of utility poles does not mitigate these dangers given the high tree-fall-in risk, as was already pointed out in PG&E's own Wildfire Mitigation Plan. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I again urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Sincerely,

Cynthia H Barbera
Oakland, CA
cynbarbera@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Dave Reichmuth <dave.reichmuth@gmail.com>
Sent: Thursday, March 27, 2025 3:48 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Scoping Comments for NOP of EIR for PG&E's Moraga-Oakland X (MOX) 115 Kilovolt (kV) Rebuild Project
Attachments: PGE MOX EIR.pdf

CPUC Commissioners and MOX EIR Team,

I am submitting the following comments on the scope and content for the Environmental Impact Review of the MOX project. These comments are in addition to the joint letter submitted by Matt Solomon and Natasha Desai which I co-signed. The Proponent's Environmental Assessment (PEA) is inadequate as it fails to evaluate the consequences of the wildfire risk of the proposed project and does not quantify the reduction in environmental impact from a lower wildfire risk alternative (Alternative B). PG&E should be directed to develop a project proposal consistent with Alternative B in an area that is known to be susceptible to hazardous wildfire. The PEA states that the primary reason to reject Alternative B is that "it would not be economical". However, there is no analysis or data provided to quantify the increase in cost for undergrounding the transmission line in these highly populated areas that are known to be at high risk for wildfire.

The PEA also does not adequately quantify the risk of wildfire nor evaluate the consequences of a wildfire initiated by overhead transmission lines. The WTRM model used appears to be based on historical conditions and does not reflect the impact of climate change on the ignition risk over the decades that this line would be in operation. The average annual maximum temperature in California is projected to rise 3.3 to 4.4 degrees F by 2050 and up to 7.2 degrees by 2070. ^[1] Increased temperatures, coupled with changing precipitation patterns driven by climate change are projected to increase wildfire potential in the state dramatically. ^[2] This project's impacts must be considered in the context of the environment that is likely to exist in the coming decades.

Even with the baseline calculations that do not account for the likely more extreme future conditions, PG&E's WTRM model shows that the project at completion would still have an annual wildfire risk of 0.331%, which is significant given the likely lifespan of this line of decades. Over a 50-year span, this equates to a greater than 15% risk of wildfire and 22%

over 75 years. Given the non-negligible risk of wildfire, the impacts of a wildfire in the proposed overhead zones must be considered and fully quantified.

The consequences of fire in the Oakland hills is well known from the experience of the 1991 Tunnel Fire, which killed 25 people and damaged over 3,000 structures. The PEA briefly notes that over 1,500 structures - primary residences – are within 1,000 feet of the proposed overhead lines in the Montclair neighborhood and more homes are uphill from the Diamond Canyon area where the overhead lines currently cross. However, no estimate is made of the potential lives or property that would continue to be at risk from an overhead transmission line initiated fire. The PEA also does not consider the potential environmental impacts from a fire in these areas, which would be significant as well. While the full impacts of urban-interface wildfire like the Altadena fires are only beginning to be researched, early indications are that there are significant and long-lasting impacts.^[3]

The PEA states Alternative B would replace approximately 4.2 miles of the existing overhead lines by underground lines. Although the wildfire risk reduction was not calculated for Alternative B, it is likely that it would result in a substantial reduction in wildfire risk. Alternative B would replace more of the lines underground and would provide an incrementally greater reduction in wildfire risk than the proposed project during the O&M project phase.” Given the catastrophic impacts of utility-caused wildfire the state over the past decade, these “substantial reductions in wildfire risk” from Alternative B and other fully underground alternatives must be calculated and compared to the potential risks of the proposed project during the operation and maintenance phase.

Sincerely,

David Reichmuth
2278 Leimert Blvd
Oakland, CA 94602

¹California’s Fourth Climate Change Assessment: San Francisco Bay Area Region Report (2019) https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-005_SanFranciscoBayArea_ADA.pdf

² Projected Changes in Reference Evapotranspiration in California and Nevada: Implications for Drought and Wildland Fire Danger, McEvoy et al, (2020) <https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2020EF001736>

³ Science, vol 387, issue 6741 (2025). <https://www.science.org/content/article/scientists-scramble-to-track-la-wildfires-long-term-health-impacts>

March 27, 2025

RE: Public Comment on EIR Scoping for the Proposed PG&E Moraga-Oakland Transmission Rebuild Project (MOX 115 kV Rebuild Project)

Dear CPUC Commissioners and MOX EIR Team,

I am submitting the following comments on the scope and content for the Environmental Impact Review of the MOX project. These comments are in addition to the joint letter submitted by Matt Solomon and Natasha Desai which I co-signed.

The Proponent's Environmental Assessment (PEA) is inadequate as it fails to evaluate the consequences of the wildfire risk of the proposed project and does not quantify the reduction in environmental impact from a lower wildfire risk alternative (Alternative B). PG&E should be directed to develop a project proposal consistent with Alternative B and evaluate a fully underground alternative to minimize fire risk from transmission lines in an area that is known to be susceptible to hazardous wildfire.

The PEA states that the primary reason to reject Alternative B is that "it would not be economical". However, there is no analysis or data provided to quantify the increase in cost for undergrounding the transmission line in these highly populated areas that are known to be at high risk for wildfire.

The PEA also does not adequately quantify the risk of wildfire nor evaluate the consequences of a wildfire initiated by overhead transmission lines. The WTRM model used appears to be based on historical conditions and does not reflect the impact of climate change on the ignition risk over the decades that this line would be in operation. The average annual maximum temperature in California is projected to rise 3.3 to 4.4 degrees F by 2050 and up to 7.2 degrees by 2070.¹ Increased temperatures, coupled with changing precipitation patterns driven by climate change are projected to increase wildfire potential in the state dramatically.² This project's impacts must be considered in the context of the environment that is likely to exist in the coming decades.

Even with the baseline calculations that do not account for the likely more extreme future conditions, PG&E's WTRM model shows that the project at completion would still have an

¹California's Fourth Climate Change Assessment: San Francisco Bay Area Region Report (2019)
https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-005_SanFranciscoBayArea_ADA.pdf

² Projected Changes in Reference Evapotranspiration in California and Nevada: Implications for Drought and Wildland Fire Danger, McEvoy et al, (2020)
<https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2020EF001736>

annual wildfire risk of 0.331%, which is significant given the likely lifespan of this line of decades. Over a 50-year span, this equates to a greater than 15% risk of wildfire and 22% over 75 years. Given the non-negligible risk of wildfire, the impacts of a wildfire in the proposed overhead zones must be considered and fully quantified.

The consequences of a fire in the Oakland hills is well known from the experience of the 1991 Tunnel Fire, which killed 25 people and damaged over 3,000 structures. The PEA briefly notes that over 1,500 structures – primarily residences – are within 1,000 feet of the proposed overhead lines in the Montclair neighborhood and more homes are uphill from the Dimond Canyon area where the overhead lines currently cross. However, no estimate is made of the potential lives or property that would continue to be at risk from an overhead transmission line initiated fire. The PEA also does not consider the potential environmental impacts from a fire in these areas, which would be significant as well. While the full impacts of urban-interface wildfires like the Altadena fires are only beginning to be researched, early indications are that there are significant and long-lasting impacts.³

The PEA states “Alternative B would replace approximately 4.2 miles of the existing overhead lines by underground lines. Although the wildfire risk reduction was not calculated for Alternative B, it is likely that it would result in a substantial reduction in wildfire risk. Alternative B would replace more of the lines underground and would provide an incrementally greater reduction in wildfire risk than the proposed project during the O&M project phase.” Given the catastrophic impacts of utility-caused wildfire in the state over the past decade, these “substantial reductions in wildfire risk” from Alternative B and other fully underground alternatives must be calculated and compared to the potential risks of the proposed project during the operation and maintenance phase.

Sincerely,

David Reichmuth
2278 Leimert Blvd
Oakland, CA 94602

³ Science, vol 387, issue 6741 (2025). <https://www.science.org/content/article/scientists-scramble-to-track-la-wildfires-long-term-health-impacts>

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: cuzzofam@jps.net
Sent: Thursday, March 27, 2025 11:54 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Response to CPUC's NOP for their EIR

Dear MOX EIRTeam,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) or the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. Of course this is personal for us, as we lived through the Hills fire in the 90's, and also, our current home in Montclair sits so close to so many power lines, in fact one that sits directly on our property; however, it is the total loss of community that concerns us the very most when the next fire comes to the hills of Oakland, and it will. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Jean Marcuzzo

Dale and Roswitha Robinson
1962 Asilomar Dr.
Oakland, Ca 94611
Tel. 510-339-2769
E-mail: roswithar1022@g.mail.com

March 8, 2025

Ms. Tharon Wright, CPUC Project Manager
PUC State of California
505 Van Ness Ave
San Francisco, CA, 94107

Subject: Support for Undergrounding All Electrical Wires in "Very High" Fire
Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to mandate undergrounding all electrical lines for this and future projects, in regions designated as "very high" fire danger severity zones. Recent devastating fires have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks and feeds into the homeowners' insurance crisis, consistent with SB 884.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines, though initially more costly, offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks and redirect investment into new technology.

PGE acknowledges in its Wildfire Risk Mitigation that: "When a line is underground, we reduce nearly all wildfire ignition risk in that location." PGE has mitigated other "very high" fire risks with undergrounding, and acknowledges current capacity,

safety, reliability and longevity issues. Updated technology (undergrounding) provides the opportunity to improve service to customers, public safety and esthetics.

Undergrounding would also address PGE's justification of its March rate increase - due to the cost of tree pruning. Undergrounding eliminates a huge recurring financial, environmental and esthetic cost. Ratepayers are entitled to a responsible use of their funds, and a forward-looking utility provider.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in "very high" fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies, consistent with the intent and goal in SB 884. Thank you for considering this critical issue. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Dale Robinson Roswitha Robinson

Dale and Roswitha Robinson

CC: Governor Newsom
Mayor Jenkins
Senator Arrequin
Assemblymember Wicks
Councilmember Ramachadran

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Janet Hailer <jhjh.hailer@gmail.com>
Sent: Thursday, March 27, 2025 2:56 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

Ms. Tharon Wright, CPUC Project Manager Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas Dear MOX EIR Team, I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks.

While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

I urge CPUC to prioritize undergrounding as the standard practice for all power line rebuilds in high fire risk zones. By taking this step, we can create a safer, more resilient energy infrastructure that will help prevent future tragedies.

Thank you for considering this critical issue. Of course this is personal for us, as we lived through the Hills fire in the 90's, and also, our current home in Montclair sits so close to so many power lines, in fact one that sits directly on our property; however, it is the total loss of community that concerns us the very most when the next fire comes to the hills of Oakland, and it will. I look forward to seeing stronger commitments to wildfire risk reduction in the environmental review process for this project.

Sincerely,

Janet Hailer

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Brenda S. <bresshon@yahoo.com>
Sent: Friday, March 28, 2025 12:14 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: MOX Project Comment

Dear CPUC, Moc

Thank you for the opportunity to comment on the MOX Project. We are residents in the Montclair District situated in the Oakland Hills. We are gravely concerned of the wildfire risk posed by the overhead MOX transmission lines running through Montclair, especially in Shepherd Canyon located in heart of Montclair. We urge CPUC to amend the proposal submitted by PGE, to either underground the transmission line in Montclair, or relocate the transmission line to other less wooded and less densely populated area. Montclair is a heavily wooded and densely populated area, The area is often buffeted by strong canyon winds, especially during the dry season. There are very limited ingress and egress routes for a population of this size. Overhead transmission line in this area poses great wildfire risk, and the consequence of a wildfire in this area will be devastating. Therefore, we urge CPUC to amend the proposal submitted by PGE, to either underground the transmission line in Montclair, or relocate the transmission line to other less wooded and less densely populated area.

Thank you,
Brenda So and Family

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: BK Doyra <bkdoyra@yahoo.com>
Sent: Friday, March 28, 2025 11:14 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Fw: MOX REBUILD PROJECT: SUPPLEMENT TO CPUC SUBMISSION:
ALTERNATIVE B
Attachments: CPUC Supplemental Submission.pdf

Hello,

I agree with Barbara Rosenfeld. The wires will eventually need to be undergrounded. Why not do it now and save the time and expense of dealing with the problem twice minimizing the fire hazard in the process.

Sincerely BK Doyra

----- Forwarded Message -----

From: Barbara Rosenfeld <jdorchid@me.com>
To: "mox@aspeneg.com" <mox@aspeneg.com>
Cc: Montclair PGETowers <stopthepgetowersmontclair@gmail.com>; Undergrounding Montclair <undergrounding.montclair@gmail.com>; Janani Ramachadran <district4@oaklandca.gov>; Erika Neal <erika.neal@sen.ca.gov>; Ilaf Esuf <ilaf.esuf@asm.ca.gov>; Daijon Jackson <daijon.jackson@asm.ca.gov>
Sent: Tuesday, March 25, 2025 at 03:45:29 PM PDT
Subject: MOX REBUILD PROJECT: SUPPLEMENT TO CPUC SUBMISSION: ALTERNATIVE B

Attached please find my supplemental submission.

BARBARA L. ROSENFELD

1965 Asilomar Drive

Oakland, CA. 94611

Tel. 510-817-4869

Cell: 310-709-4329

E-mail: jdorchid@mc.com

Email: MOX@aspencg.com

March 25, 2025

Ms. Tharon Wright, CPUC Project Manager

Subject: **MOX Rebuild Project: CPUC Request to Address the Alternatives**

Dear MOX EIR Team,

I am writing to supplement my response dated March 3, 2025, to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project. The CPUC specifically requested that the Alternatives be addressed.

Alternative B provides more undergrounding and thus, more public safety than the primary PGE proposal. Despite the Oakland Hills having experienced a tragic loss of 25 lives and destruction of 3,400 homes in 1991, and the passage of SB 884 in 2022, it is my understanding that the CPUC approved a 10-year undergrounding plan that omits significant portions of the Oakland Hills.

It is imperative that the omission from the 10-year plan be corrected before another devastating tragedy. In the interim, Alternative B appears to offer greater protection against fire risk.

Sincerely,



Barbara L. Rosenfeld

CC: Governor Newsom
Interim Mayor Jenkins
Senator Arrequin
Assemblymember Wicks
Councilmember Ramachadran

Undergrounding Montclair undergrounding.montclair@gmail.com

PG&E Tower Group stopthepgetowersmontclair@gmail.com

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Denis Neema <dneema@yahoo.com>
Sent: Wednesday, March 26, 2025 7:00 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Support for Undergrounding All Electrical Wires in High Fire Danger Areas

Dear MOX EIR Team,

I am writing in response to the California Public Utilities Commission's (CPUC) Notice of Preparation (NOP) for the Environmental Impact Report (EIR) regarding the Pacific Gas and Electric Company's (PG&E) Moraga-Oakland X (MOX) 115 kV Rebuild Project.

I strongly urge CPUC to consider undergrounding all electrical lines for this and future projects, especially in regions designated as high fire danger zones. Recent devastating fires in Los Angeles, the Palisades, and Altadena have underscored the critical risks posed by overhead power lines in wildfire-prone areas. These fires have not only caused tragic loss of life and property but have also highlighted the urgent need to address the infrastructure that exacerbates these risks. While I recognize that the proposed MOX Project includes a small segment of underground lines, I believe that a more comprehensive solution is necessary to protect both communities and the environment. Undergrounding power lines offers significant long-term benefits in terms of reducing fire risks, improving grid reliability, and protecting public safety. With the increasing frequency and intensity of wildfires in California, it is imperative that we take every possible measure to mitigate these risks.

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Sincerely,

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Denis Neema, Realtor®
CalDRE#: 02008548

m: 415.254.0838
[A little about me](#)

COMPASS

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: andrewjeffries@comcast.net
Sent: Wednesday, March 26, 2025 11:50 AM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Cc: 'Jeffries Patty'
Subject: Seeking additional information

Thank you for sharing the PPT of the poposed project.

My name is Andrew Jeffries, and I am a property owner at 7075 Sayre Drive, Oakland. There are two towers on our lot very close to our house, with our automobile parking and gardens underneath the wires.

As you might expect, we are concerned about the scope of the project and what effects it may have on our living environment and access to our home during this project.

Several Questions/Comments

- 1) Please add my name to an email distribution list and include me in all further communication.
 - a. Andrew and Patricia Jeffries
 - b. adjeffries@comcast.net
 - c. 510-684-5040
- 2) Will these two towers be fully replaced?
 - a. Taken down and replaced with new frames and cables?
 - b. What is the estimated length of time the construction equipment will be on the property?
 - c. If the towers are new, must they be on the same footprint?
 - d. How tall will they be? How many wires?
 - e. The cables currently run over our garden areas, with many small fruit trees and landscaping. How will this be protected?
 - f. If new, would it be possible to have them moved somewhat forwards or backwards along the lines to further avoid the house and the major disruption of the construction.
- 3) Is there a recording available from the earlier Zoom presentation.
- 4) What is the next public opportunity to discuss and ask questions?
- 5) Please describe various alternative options listed on the last page of the presentation.

Many thanks for your answers.

Sincerely,
Andrew Jeffries

PG&E Moraga-Oakland X 115 kV Rebuild Project

From: Linda <lcdannin@gmail.com>
Sent: Thursday, March 27, 2025 6:26 PM
To: PG&E Moraga-Oakland X 115 kV Rebuild Project
Subject: Extreme fire danger in Oakland hills

I am a longtime resident in the Montclair area of Oakland-centrally located in the Oakland Hills. To think that we are not in an extreme fire zone is unbelievable and dangerous to the residents, homes, businesses and wildlife in this beautiful heavily-wooded area. We are next to the area that burned and killed in 1991 and only survived due to a change in wind direction. Egress from this area is very limited, and like 1991 many of us will DIE if there is a fire. Your job is to keep us safe and take the extreme fire danger seriously. We are in need of undergrounding wires and have brought this to your attention already. Drones, warnings, tree decimation is not the answer, only possible stopgap measures. You should know that already. A decision should be made in the interest of all residents and not the ineffective ideas of PGE. We are sick of this monopoly getting its way at our expense. Linda Walton Oakland Hills resident since 1975.

Sent from my iPhone