



State of California – Natural Resources Agency
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March 24, 2025

Tharon Wright, Public Utilities Regulatory Analyst IV
California Public Utilities Commission
300 Capitol Mall, Suite 500
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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, Brosofske 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

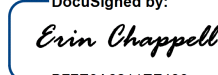
CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. 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
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Erin Chappell
Regional Manager
Bay Delta Region

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Attachments: Attachment A

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2025020944)
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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.

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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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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
<p>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.</p>		