

Email: SCE Ivanpah Control

From: Scheier, Jeremy M <jeremy_scheier@nps.gov>
Sent: Wednesday, May 13, 2026 3:27 PM
To: Ivanpah-Control Project Team
Subject: Draft EIR Comments - Manzanar National Historic Site
Attachments: Manzanar NHS - Ivanpah TLRR CEQA DEIR Response Letter.pdf

Follow Up Flag: Follow up
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Hi Team,

See attached for informal input from Manzanar National Historic Site (NHS) on the DEIR for the Ivanpah Control Project. Please let me know if there are any questions or you need anything else for submitting input.

Thanks!

Jeremy

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Jeremy Scheier
Superintendent | [Manzanar National Historic Site](#)
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United States Department of the Interior

NATIONAL PARK SERVICE
Manzanar National Historic Site
PO Box 426
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IN REPLY REFER TO:
I.D (8760)

California Public Utilities Commission
SCE Ivanpah-Control Project
c/o Aspen Environmental Group
235 Montgomery Street, Suite 967
San Francisco, CA 94104-2920
Attention: John Forsythe, CPUC Project Manager (Ivanpah-Control@aspeneeg.com)

To Whom It May Concern:

The National Park Service (NPS) values the opportunity to provide informal input on the California Public Utilities Commission (CPUC)'s Draft Environment Impact Report (DEIR) related to the Southern California Edison (SCE) Ivanpah-Control Project, SCH Number 2020080553. The Project is situated near Manzanar National Historic Site (NHS). The comments below carry forth from previous collaborative efforts and receptiveness to prior NPS input.

An environmentally superior alternative (ESA) was developed that appreciably mitigates impacts to Manzanar NHS and associated resources identified in the original project proposal. The visual setting is one of the character-defining elements contributing to significance of Manzanar NHS. Adoption of the Manzanar Alternative Route and move of the powerline to the eastern side of Owens Valley mitigates the visual impact to a Key Observation Point (KOP) associated with the site.

We have reviewed the DEIR and provide these comments in support of the ESA.

1. Visual impacts to Manzanar NHS visitors

The NPS Air Resources Division has provided some additional analysis for the Aesthetics Section of the DEIR, with further detail for how the mitigations reduce visual impacts from the project affecting the Park and its visitors. The benefit of these mitigations increases with distance. At two miles or greater, impacts from the structures become less noticeable to the casual observer.

The existing transmission line consists of lattice towers approximately 70 feet tall that visually recede into the background and are part of the historic viewshed. The proposed SCE Ivanpah Control TLRR Project would replace nine lattice towers with tubular steel poles (TSPs) ranging

from 75 to 140 feet in height, an increase of up to 70 feet.

While a dulled galvanized finish may reduce initial reflectivity, subsequent weathering is typically subtle and does not result in substantial darkening or a finish that would necessarily more closely match existing transmission structures. The increased height, more vertical form, and change in materials would likely increase visual contrast and industrial character, drawing greater visual attention within the landscape and competing with views of the Inyo Mountains.

Although existing transmission infrastructure provides visual context, the DEIR identifies high viewer concern, noting that any increase in industrial character would be perceived as an adverse visual change. Compared to the existing lattice towers, tubular steel pole (TSP) monopoles introduce a more solid, simplified, and visually continuous form that is typically read as more industrial in character. Combined with increased height and material contrast, this would be expected to increase visual contrast, particularly within approximately one mile of the Visitor Center at Manzanar National Historic Site. At greater distances, particularly beyond two miles, visual impact would be reduced as structures become less noticeable to the casual observer.

Finally, clarification is requested on whether the commitment to use non-specular conductors applies to all project segments, including Segment 1.

2. Material Yard 1-10 impacts to sites near Manzanar Airfield

The NPS supports the removal of Material Yard 1-10 from the final EIR and CEQA decision for the Ivanpah-Control Project. This would affirm prior discussions between the NPS and SCE. Material Yard 1-10 was originally located at Manzanar Airfield which lies across California Highway 395 and in full view from the NHS. The DEIR (page 3.6-65) asserted that Material Yard 1-10 would be used only if necessary.

In addition to Japanese American incarceration, Manzanar NHS interprets the town of Manzanar. There are several historic sites from the town of Manzanar adjacent and near the airfield that are not considered in the DEIR because they are not in the original direct impact area. However, these sites could impact the ability to find a suitable alternate area for the Materials Yard that avoids the airfield.

3. Manzanar Sewage Treatment Plant

The NPS requests clarification regarding the Manzanar Sewage Treatment Plant relative to its contribution to the history of Japanese-American internment and coincident ineligibility for listing on the California Register of Historical Resources (CRHR). The DEIR recognized the significance of Japanese American internment in local, state, and national history, yet also identified the sewer plant site is listed as ineligible for listing in the CRHR (P-14-005023/ CA-INY-4944H/ 127) (Appendix 5A, page 5A-92).

The historic 70-foot lattice steel towers north and south of the sewage plant are contributing factors to the viewscape of the NHS's period of significance. Their removal would cause substantial visual impacts and ground disturbance; removing the towers but leaving the foundations in place would mitigate impacts from ground disturbance but still result in sizeable visual impacts.

4. Errors or omissions in the text

Suggested corrections are below to maintain historical accuracy and consistency in the DEIR.

“Military” and “national defense” are identified as research themes (the former term in the discussion in section 3.6.1.7 beginning on 3.6-25, the latter in the discussion on page 3.6-10 through 3.6-11), but neither are discussed under the “Eligibility Evaluation by Resource Theme” beginning on page 3.6-47. To clarify descriptions of military and national defense sites and CRHR eligibility in the DEIR, NPS suggests that the “Eligibility Evaluation by Resource Theme” include a discussion of the military/national defense sites. It would include Table 3.6-8 which lists four archeological resources eligible for the CRHR; Table 3.6-9 which lists four built environment resources eligible for the CRHR; and sites described on pages 3.6-10 and 3.6-11 (Naval Air Weapons Station China Lake, Edwards Air Force Base, Marine Corps Logistics Base Barstow, and Fort Irwin National Training Center). This discussion should also describe Manzanar NHS which is mentioned on page 3.6-11.

Inaccuracies in the description of Manzanar NHS on page 3.18-17 should be corrected:

Manzanar NHS. LESS THAN SIGNIFICANT WITH MITIGATION. This site, which is listed in Table 3.18-1, is an important destination for visitors wanting to learn about the Japanese American internment during World War II, as well as for family members of internees. ~~The internment and residential area of Manzanar NHS is and the current visitor center are~~ located approximately one mile west of the Proposed Project ROW.

Clarifications to Appendix, page 5A-89, Table Ap.5-5 are recommended to help distinguish between the NPS unit’s boundaries and resources associated with Japanese American incarceration:

- Table Ap.5-5 can be misleading for Manzanar NHS because the archeological site (CA-INY-3802H/125) as recorded is smaller than the NHS boundary. Further, the NHS does not include all the components listed in the description.
- “Manzanar NHS” is the appropriate name, so it might be clearer if the site number was annotated to show the NHS and recorded site boundary are not coterminous. Land ownership of the recorded site is National Park Service. Listing the “Resource Type” as “military” would be more appropriate.
- The Site Description column in Table Ap.5-5 should be corrected to read:

Manzanar National Historic Site. Former Japanese American internment camp (6,200 acres) established during World War II, located ~~west east~~ of the ~~Eastern~~ Sierras Nevada in the Owens Valley. It was one of ten Military ~~and National Defense~~-style camps established as a result of Executive Order 9066, signed by President Franklin D. Roosevelt on February 19, 1942. From 1942 to 1945 the relocation camp was home to over 10,000 men, women and children. Components of the NHS include the remains of a

500-acre housing section enclosed by barbed wire, eight guard towers, a Military Police compound and National Defense police housing, and a cemetery. The associated, an airport, a reservoir, a sewage treatment plant, and agricultural fields are located outside the NHS boundary; all external components were recorded as separate sites and therefore have separate archeological site numbers. for subsistence living.

Thank you again for the opportunity to review the DEIR for the SCE Ivanpah-Control Project. For questions or additional information, please contact me at jeremy_scheier@nps.gov or (760) 878-8952.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Scheier', with a stylized flourish at the end.

Jeremy Scheier
Superintendent
Manzanar National Historic Site