

Email: SCE Ivanpah Control

From: Coral Cavanagh <curalium@gmail.com>
Sent: Friday, May 15, 2026 3:46 PM
To: Ivanpah-Control Project Team
Cc: Susan Lee; Forsythe, John; Steve Glikbarg
Subject: Draft EIR Comments - SCE Ivanpah-Control Project
Attachments: C Cavanagh Draft EIR Comment Letter 20260515.pdf

Attached is a letter with comments regarding the Draft EIR for the SCE Ivanpah-Control Project. Please confirm that you received this email and the attached letter.

Thank you in advance for your attention to this matter.

Coral Cavanagh, AICP

Written Comments on the Draft Environmental Impact Report

SCE Ivanpah-Control Project

Application A.19-07-015 · State Clearinghouse #2020080553

Crater Mountain Realignment Alternative · 945 Birch Creek Road, Big Pine, CA

Submitted to:

Aspen Environmental Group, on behalf of the California Public Utilities Commission

Email: Ivanpah-Control@aspeneg.com

Subject: Draft EIR Comments - SCE Ivanpah-Control Project

Submitted by: Coral Cavanagh, Friend of the Birch Creek Community

Dear Aspen Environmental Group,

This letter contains my comments on the Draft Environmental Impact Report (DEIR) for the SCE Ivanpah-Control Project (project) and specifically on the Crater Mountain Realignment Alternative (CMR Alternative) as it would affect the Birch Creek Community in Segment 1 of the project. The Birch Creek Community comprises a neighborhood of residential parcels about 7 miles south of Big Pine, California, in Inyo County.

I live in Truckee, California, and as a friend of its owner, Steve Glikbarg, I have been a frequent guest at 945 Birch Creek Road, a private residential parcel in the Birch Creek Community, for more than 35 years. Because of my time spent onsite, my work as an environmental engineer/planner in the area, and personal recreational time elsewhere in the Owens River Valley and the eastern Sierra, I am familiar with the regional setting and the Birch Creek Community, and am very familiar with the residential property at 945 Birch Creek Road, a property that would be affected by implementation of the CMR Alternative.

The 945 Birch Creek Road parcel includes several residential and utility structures, landscaped areas, and many beautiful, well-used walking paths through the developed and not-yet-developed parts of the property. The Glikbarg family and its personal guests enjoy the property for its unique setting on Birch Creek, and treasure the walking paths in particular. It is a special site of singular beauty that I have had the privilege to take into my heart over the years. In fact, my wedding was held there.

In meetings with the SCE on April 27, 2026 and May 14, 2026, 945 Birch Creek Road owner Steve Glikbarg and I met with SCE representatives to discuss the project. In our April 27, 2006 meeting, SCE displayed the preliminary scheme for location of the project structures. According to that scheme, two of the project structures would be placed in the Birch Creek Community, and one of the project structures, referred to as Structure 26, would be placed directly on the 945 Birch Creek Road property, with construction work area on the property. See Figure 1.



Figure 1. SCE Preliminary Siting Scheme for Transmission Structures within the Birch Creek Community. As displayed by SCE during April 27, 2026 meeting: parcel boundaries shown in green; work areas shown in red. Parcel address annotation added for this submittal.

The CMR Alternative preliminary design shows the alignment of the new SCE corridor approximately 190 feet east of the existing corridor comprising LADWP lines and the Pacific DC Intertie (this combined corridor hereafter referred to as “the LADWP corridor”). Given the CMR Alternative’s corridor proximity to the residences nearby, the DEIR does not adequately address potential impacts of the CMR Alternative in the following resource areas for the Birch Creek Community:

- Noise
- Cultural Resources
- Wildfire
- Aesthetic/Visual
- Land Use

My general comments are that Aspen Environmental and the CPUC need to analyze potential impacts in these resources areas more thoroughly. I have made specific requests the sections below. I also ask that the CPUC consider carefully whether the CMR Alternative is actually the “Environmentally Superior Alternative” for this project in Segment 1 (as designated in the DEIR), based on what I hope will be a more thorough analysis and comparison of alternatives in the Final EIR.

In addition, I ask that before the Final EIR is issued, SCE evaluate several options for the CMR Alternative alignment in the Birch Creek Community area, in the interest of

determining whether the options can improve environmental outcomes for the Birch Creek Community, and can contribute to a supportable Environmentally Superior designation for the CMR Alternative in Segment 1.

Noise

From several areas in the Birch Creek Community, the corona discharge from the existing LADWP corridor is evident, even during dry conditions. At times most conducive to corona discharge, the loud crackling and popping coming from the LADWP corridor is at best disconcerting, and usually downright frightening. Although the CMR Alternative would result in a new transmission corridor even closer to the Birch Creek Community than under existing conditions, and in fact on two of its parcels, the Draft EIR does not specifically address the noise impacts that would occur there.

The Draft EIR states, "According to the EPA, outdoor noise levels are generally near 35 dBA L_{dn} in wilderness areas and near 40 dBA L_{dn} in rural residential areas. (U.S. EPA, 1978)." The referenced EPA document (*Protective Noise Levels*, November 1978, EPA 550/9-79-100) says this on page 9:

The noise environment outside residences in the United States can be highly variable ... outdoor Day-Night Sound Levels in different areas vary over a range of 50 dB. Levels occur as low as $L_{dn} = 30$ to 40 dB in wilderness areas ... Rural populations enjoy average outdoor sound levels generally lower than $L_{dn} = 50$ dB.

The Draft EIR relies on a questionable interpretation of a 1978 EPA reference document with an assumption that is unsupported. Neither actual neighborhood conditions nor current monitoring of the Birch Creek Community area were considered or used for the Draft EIR. The Birch Creek Community's actual ambient noise environment is not consistent with an "undeveloped" or "wilderness" area, and may already have noise levels at the upper end or higher than the levels expected for rural populations. The Birch Creek Community already is subject to the operational noise of the existing LADWP transmission corridor at variable distance from residences. The community also experiences noise from community activities, Highway 395 traffic, and aircraft passing frequently. The baseline noise level in the community may be higher than that assumed, and without a formal noise analysis, a conclusion regarding impacts cannot be reached.

The proposed new SCE corridor would operate simultaneously with the existing LADWP corridor. The Draft EIR dismisses operational noise without analysis. I ask that the Final EIR address the future cumulative noise of the new SCE corridor and the existing LADWP corridor operating simultaneously, with combined corona discharge noise affecting residential receptors, with respect to real baseline data. The Draft EIR's analysis does not address this cumulative configuration, and does not adequately acknowledge the Birch Creek Community residences as noise-sensitive receptors.

For the Final EIR I ask the following for the Noise Analysis:

- Include the Birch Creek Community in the list of noise-sensitive receptors in Segment 1 (Draft EIR page 3.15-4).
- Include a Figure (between current Figures 3.15e and 3.15f) showing the Birch Creek Community residences as noise-sensitive receptors.
- Characterize the Birch Creek Community accurately for noise, as an established residential area that is a noise-sensitive receptor area, and not, as the Draft EIR does, by lumping it in with other “undeveloped open space” areas.
- Perform day and nighttime noise monitoring at Birch Creek residences to obtain actual current ambient levels (with the existing LADWP corridor energized, and during conditions conducive to corona discharge). Compare the projected operational noise of the new SCE lines cumulatively with the LADWP corridor energized and operating simultaneously, and interpret them using appropriate regulatory thresholds. Include these results in the Final EIR.

Cultural Resources

I am aware that cultural resources exist on the 945 Birch Creek Property and in other areas very near the Birch Creek Community. Placing a corridor near the community, and placing a structure on the 945 Birch Creek Road property (as part of the CMR Alternative), would have the potential for SIGNIFICANT AND UNAVOIDABLE cultural resources impacts on the Birch Creek Community resources. The DEIR notes that cultural resources exist in many areas along the CMR Alternative corridor. Prioritizing the protection of cultural resources in one area over another seems arbitrary.

For the Final EIR I ask the following for the Cultural Resources Analysis:

- Within the applicable regulatory confidentiality constraints, release the cultural resources report information for 945 Birch Creek Road with its owner, Steve Glikbarg, so that he can fully assess the adequacy of mitigation as applied to his parcel.

Wildfire

Placing a transmission structure on the 945 Birch Creek Road property, along with additional structures near the Birch Creek Community, would likely reduce wildfire risk associated with the existing, aging facility near 395. Placing transmission structures nearer to the Birch Creek Community (nearer than under existing conditions), as proposed under

the CMR Alternative, could at the same time increase wildfire risk for the Birch Creek Community compared to existing conditions, and could decrease insurability of properties in the community. In addition, the community is farther away from emergency services than the Highway 395 corridor is, and a fire along the LADWP corridor near the Birch Creek Community would require emergency response via unmaintained roads, rather than via a highway.

The Draft EIR also does not address the cumulative wildfire effect of operating new SCE transmission corridor alongside and simultaneously with the existing LADWP transmission corridor, within the Birch Creek Community.

For the Final EIR I ask the following for the Wildfire Analysis:

- Identify the properties in the Birch Creek Community specifically as sensitive receptors with respect to wildfire in Segment 1 (Section 3.21).
- Analyze the potential, compared to current conditions, for increased wildfire risk and potential insurability concerns for the Birch Creek Community.
- Consider the cumulative contribution that the CMR Alternative would make to wildfire risk and insurability for the Birch Creek Community.

Aesthetics/Visual

The Birch Creek Community enjoys a setting of singular and spectacular natural beauty. The visual quality of the views from its residences is very high, with the exception of the presence of the LADWP transmission corridor. To the west, the view of the Sierra Nevada dominates the upper portion of the view. The LADWP corridor dominates the lower foreground. When enjoying the trails on the 945 Birch Creek Road property, one perceives the mountains first, and the existing transmission corridor as one looks back down. Siting an additional corridor to the east of the existing corridor (and according to the scheme displayed in our April 27, 2026 meeting with SCE) would place a very large set of structures in the foreground, and the new facilities would dominate and interfere with a view of particular beauty for the Birch Creek Community.

The preliminary scheme for the CMR Alternative, as noted above, would place a very large structure directly on the 945 Birch Creek Road property, resulting in views of transmission structures in front of the Sierra view, a large structure on the property, and transmission lines overhead. These intrusions in the view would disrupt and severely degrade the views from the property from the residential structures on the eastern part of the parcel, as well as from the treasured walking paths on the western parcel portion.

The new facilities would dominate and interfere with a view of particular beauty for the Birch Creek Community. The placement of “Structure 26,” (as shown in Figure 1) in particular, would interfere with one of the choice views from the lower elevation part of the 945 Birch Creek Road property. Figure 2 shows the view from that beloved spot. This photo was taken on May 7, 2026, and conservatively shows the view from a standing position, rather than seated, from where the mountains are even more visible.

Figure 3 shows an enlarged portion of the Figure 2 photograph. While I took the photograph, Terry Cavanagh stood on SCE’s proposed location for Structure 26 (as shown in Figure 1). He held an approximately 2-inch-diameter pole, about 15 feet in height, with an orange flag attached to the top. As is demonstrated by Figure 3, a large pole, which could be several feet in diameter and 100 feet tall or more, would by comparison dominate this view. This informal analysis demonstrates that a more thorough aesthetic impact evaluation is needed for the residential receptors in the Birch Creek Community.



Figure 2. One viewpoint from 945 Birch Creek Road



Figure 3. Informal test of location and view of “Structure 26,” visible from viewpoint in Figure 2. Figure 3 is an enlargement of a portion of Figure 2.

For the Final EIR I ask the following for the Aesthetics Analysis:

- Establish one or more Key Observation Points within the Birch Creek Community, from viewpoints of high aesthetic visual quality. The KOP(s) should be positioned to capture the foreground appearance of the proposed new SCE structures alongside the existing LADWP corridor as seen from a residential viewpoint.
- Analyze the Birch Creek Community KOP(s) in a manner comparable to the analysis presented for KOP 1-22 in the Draft EIR.
- Clearly disclose the trade-off of a view improvement for transient observers passing through the area on Highway 395 with the degradation of views for an established residential community (the Birch Creek Community) when comparing the CMR Alternative with an alignment along Highway 395.

Land Use

The Draft EIR mentions in several locations that the project would require acquisition of easements and land use rights. On page ES-14, for example, the Draft EIR says:

The alternative would require new easements, which would result in additional cost, but the cost would not be expected to prohibit implementation of the project. The alternative would require land rights from LADWP, which could result in delays to implementation, but are considered potentially feasible to obtain.

I believe that it would generally be more straightforward to obtain land rights from LADWP, or from federal agencies, than it would to obtain land or easements from a variety of private property owners, who would understandably prefer transmission facilities to be placed outside their property boundaries, rather than over — or directly on — their property. I do not own property that would be affected by the project; I am speaking as an owner of property elsewhere, and who would definitely prefer that no transmission facilities be installed on or over my own property.

Installation of a large transmission line on or above the property at 945 Birch Creek Road would render the western part of the property undevelopable for residential use and could severely, negatively impact property value for that reason.

Options

Property owner Steve Glikbarg (945 Birch Creek Road), and Terry and Coral Cavanagh (me), have developed a set of options that could be incorporated into the CMR Alternative to improve environmental outcomes for the Birch Creek Community in the resource areas discussed above. Incorporation of one of these options could also contribute to a supportable Environmentally Superior designation for the CMR Alternative in Segment 1.

In meetings with SCE on April 28, 2026 and May 14, 2026, we discussed the general feasibility and engineering considerations associated with these options. Our options are based on these discussions, and upon our observations of the existing conditions, facilities, and relationships of the facilities to the Birch Creek Community. (See Figure 4 showing facility positions and distances relative to the Birch Creek Community parcels.)

These options and accompanying depictions of them are intended to be conceptual in nature; I understand that SCE engineering would need to establish and evaluate alignments according to engineering constraints.

Option A — Fence-line modification with dedicated access road. This option would involve modifying the western fence line of 945 Birch Creek Road and obtaining rights so that the structure currently preliminarily planned as Structure 26 would stand just outside a new property boundary. (See conceptual drawing in Figure 5-A at the end of this document.)

Option A could contribute to an Environmentally Superior Alternative for these Resource Areas:

- > Land Use
- > Wildfire

Option B — Replacement-pole configurations between Structures 25 and 27. The single preliminarily sited Structure 26 would be replaced with the minimum number of additional structures necessary to avoid any placement of structures on the 945 Birch Creek Road parcel and at sufficient distance from the residence adjacent to preliminarily sited Structure 25 at 1365 Birch Creek Road. (See conceptual drawing in Figure 5-B at the end of this document.)

Option B could contribute to an Environmentally Superior Alternative for these Resource Areas:

- > Cultural Resources
- > Wildfire
- > Aesthetic/Visual
- > Land Use

Option C — Partial west-side re-alignment around the Birch Creek Community. The alternative alignment would shift to the west of the LADWP corridor, then cross back. This option would require LADWP corridor crossings in addition to those already planned for the project. In our May 14, 2026 meeting with SCE, engineering discussions noted that making crossings would be the least complicated at points where side-by-side structures (in the LADWP corridor) already exist. (See conceptual drawing in Figure 5-C at the end of this document, which shows two possible existing locations where the crossings could occur.)

SCE also noted that turning points and crossings require larger structures than the majority of structures planned. The Draft EIR's preliminary alignment maps already include a larger-footprint structure and area of disturbance just north of the Birch Creek Community for unrelated engineering reasons, which suggests larger-footprint structures are technically feasible in this segment.

Option C could contribute to an Environmentally Superior Alternative for these Resource Areas:

- > Noise
- > Cultural Resources
- > Wildfire
- > Aesthetic/Visual
- > Land Use

Option D — Local alignment between the LADWP corridor and the western edge of 945 Birch Creek Road. In the area adjacent to the Birch Creek Community, the new corridor would be aligned between the LADWP corridor and the western edge of 945 Birch Creek Road. On-site measurements suggest there may be sufficient room between the western property boundary and the LADWP corridor to accommodate a 75- to 100-foot-wide SCE corridor. This option would not require crossing the LADWP corridor, but would require a

deviation from a strict 200-foot offset over a short distance relative to the entire Segment 1. This option could avoid crossing residential properties of the Birch Creek Community. (See conceptual drawing in Figure 5-D at the end of this document.)

Option D could contribute to an Environmentally Superior Alternative for these Resource Areas:

- > Cultural Resources
- > Wildfire
- > Aesthetic/Visual
- > Land Use

For the Final EIR I ask the following:

- Require SCE to formally evaluate Options A, B, C, and D, with engineering and cost analysis documented in the Final EIR rather than deferred to Final Engineering.
- Include in the documentation a discussion of the improved environmental outcomes that could be achieved when compared to the current version of the CMR Alternative.
- Document the ways that incorporation of these options could support the designation of the Environmentally Superior Alternative.

Conclusion

The Final EIR should expand upon and add to the existing analysis for the Noise, Cultural Resources, Wildfire, Aesthetic/Visual, and Land Use resource areas, as described above. The Final EIR should also include formal cost and engineering analysis of CRM Alternative Options A, B, C, and D as presented here. This additional information will assist CPUC when deciding which alternative to implement, by informing the designation of a truly Environmentally Superior Alternative, and by disclosing the trade-offs that would be made between the selected alternative and other available alternatives.

I appreciate the Commission's and Aspen Environmental Group's careful consideration of these comments. I am available to provide any additional information that would assist the analytical work the Final EIR will require.

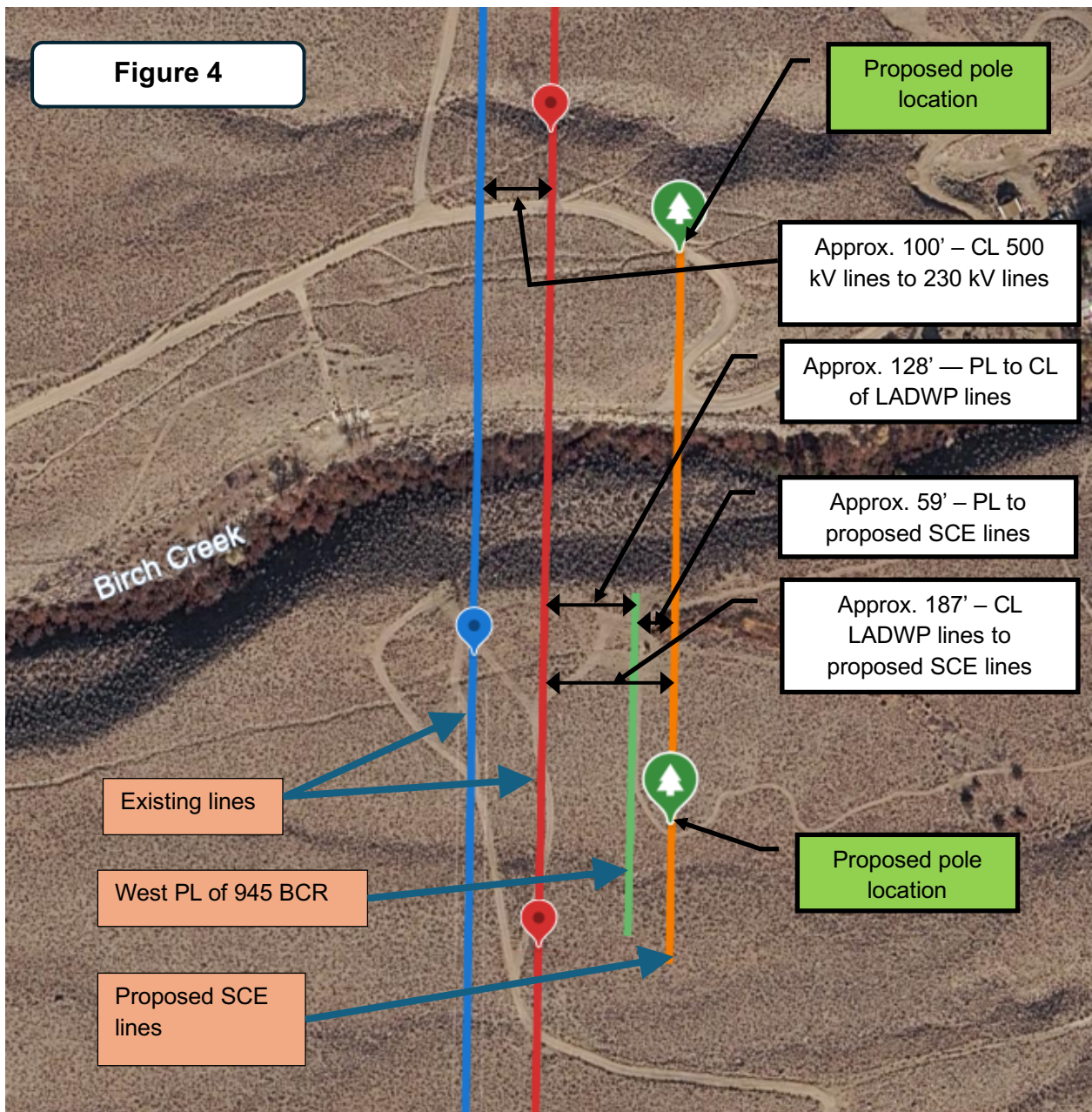
Respectfully submitted,



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Attached below on pages 12–16 are Figures 4 and 5-A through 5-D.



Measurement approximations made using Google Earth. Distance between the centerline (CL) of the LADWP line and the western property line (PL) of the 945 Birch Creek Road parcel was confirmed onsite using a tape measure (by Terry Cavanagh and Coral Cavanagh, April 24, 2026).



Figure 5-B



