Email: SCE Ivanpah Control

From: Fred Lovell <fredlovell@cox.net>
Sent: Tuesday, April 21, 2026 8:30 AM
To: Ivanpah-Control Project Team; Gary Arnold
Subject: Re: SCE Ivanpah-Control Project

NICE.Thx Gary

On Tuesday, April 21, 2026 at 08:13:33 AM PDT, Gary Arnold <garnold@atozlaw.com> wrote:

Please consider the comments in the attached letter.

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April 21, 2026

Via Email

SCE Ivanpah-Control Project
c/o Aspen Environmental Group
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Ivanpah-Control@aspeneg.com

Re: SCE Ivanpah-Control Project DEIR

Dear Aspen:

I am the attorney for Little Lake Ranch, Inc., a nonprofit mutual benefit corporation ("LLR"). I am also one of its members, directors and officers. I am submitting this letter on behalf of LLR regarding its comments on the project proposed by Southern California Edison ("Edison") described in the Draft Environmental Impact Report for the SCE Ivanpah-Control Project dated March 2026 ("DEIR").

LLR owns the Little Lake Ranch property at the far southern end of the Rose Valley, which itself is located in the most southerly region of the Owens Valley in the County of Inyo, California. The property consists of approximately 1,200 acres ("LLR Property") which is managed by LLR to provide wildlife habitat and wildlife-oriented recreation, including hunting, fishing, and wildlife viewing. The LLR Property includes a shallow 90 acre navigable body of water known as "Little Lake" and the ponds and wetlands areas lying to the south of Little Lake. Little Lake is around 1 mile long and averages a depth of about 5'. The water level is dependent upon a constant groundwater source to supply the 3 springs along the western shoreline, with additional springs feeding and replenishing the southerly ponds, wetlands and habitat.

US Highway 395 is a well-recognized scenic byway traversing miles and miles to picturesque scenery. Some of its attributes are described in the DEIR. US 395 is bisected by the LLR Property and offers dramatic views of the area around Little Lake that are partially obstructed by the unsightly Edison transmission poles and lines that are located just to the east along US 395 on the LLR Property.

In the early 2000's, LLR embarked upon and completed a habitat restoration project to substantially improve the LLR Property ("Habitat Project"). The objectives of the Habitat Project were to include restoring 90 acres of lacustrine wetlands, 10 acres of palustrine emergent wetlands, and about 6 acres of palustrine forested habitat (along a 1.6-mile long creek corridor). It also enhanced about 220 acres of wetlands-associated uplands.

The LLR Property is adjacent to U.S. Highway 395, with the frontage perhaps extending 3 miles or more. It is highly visible to numerous people traveling along this route. The Habitat Project helps generate public support for migratory birds and wetlands conservation. Little Lake is one of the few sizable wetlands sites remaining along the Eastern Sierras.

The existence of highly visible manmade structures, such as the electric utility corridor currently operated and maintained by Edison, is a serious impediment to the scenic corridor along US 395. Relocating the Edison poles, lines and facilities would greatly enhance the views along US 395 and the LLR Property which abuts it.

Section ES.7.2; Table ES-1. It is noted that the Fossil Falls Realignment alternative was evaluated. This alternative would meet all project objectives, would be technically feasible, but would require land rights from LADWP, and BLM. The impacts are similar to the Proposed Project but less severe effects on aesthetics and tribal cultural resources.

Section ES.7.3.3: This further defines the Fossil Falls Realignment alternative. It would be 14 miles long from the Coso substation to approximately 6 miles north of Pearsonville. The intent would be to remove the transmission structures from the forefront of the scenic views, and move them out of areas with highly sensitive cultural sites. The line would be consolidated with existing LADWP transmission line corridor, approximately a mile east of fossil Falls campground. The alignment would require a new private easement from LDWP and BLM, but are considered feasible. This represents a far superior route when compared to the view impairments that currently exist along US 395 adjacent to the LLR Property.

Section ES.8.1: It is expressly stated that an environmentally superior alternative in Segment 1 would be the Fossil Falls Realignment alternatives, as illustrated in Figure ES-3.

Section 3.2, "Key Observation Point" KOP 1-18: driving north along US 395. The existing electric utility corridor is in the foreground and it interrupts the scenic corridor. The area is visually interesting with a highly valued color pallet, but somewhat mitigated by US 395 and adjacent barbed wire fence. The existing transmission infrastructure features prominently are in the foreground views.

Figure 3.2-17: This clearly depicts the intrusive views of the transmission lines traversing the southern part of Little Lake and moving to the north just east us 395.

Section 3.2, KOP 1-19: Approximately 3 miles south of Little Lake, heading north is the narrows with the prominent display of the existing utility corridor on the east side. The view obstructions would be eliminated by choosing the Fossil Falls Realignment alternative.

Page 3.5.20: There are sensitive natural communities within Little Lake and especially the streams, rivers, marshes and washes. All of these are impacted by the existing transmission lines adjacent to US 395, and more particularly along that portion of US 395 adjacent to the LLR Property. Those would be eliminated by choosing the Fossil Falls Realignment alternative.

Page 3.5.21: The DEIR confirms the riparian habitat and the wetlands in the Little Lake area. Vegetation abounds throughout Little Lake that provides cover and foraging habitat, all of which is partially impacted and degraded by the existing transmission lines.

Page 3.5.3: Golden eagles are within the area, and there are suitable nesting habitats at Little Lake. The members of LLR routinely observe and enjoy the presence of not only golden eagles, but bald eagles, hawks, migratory fowl including ducks and geese, pelicans and numerous other species of birds and mammals. The removal of the transmission lines would enhance the habit used by all the fauna that are present at the LLR Property.

The LLR Property is a natural stopping place for a multitude of migratory fowl. It is not uncommon to see any number of birds collide with the existing transmission lines resulting in the birds' demise. Moving the transmission lines to the east along the Fossil Falls Realignment route would substantially reduce and probably nearly eliminate these unfortunate incidents.

Section 3.6.1.2, page 3.6-4: Little Lake shows signs of Indian artifacts and long-term occupation sites. Ground stone and milling tools indicate plant processing areas.

What is not clearly described in the DEIR are the very many cultural aspects that exist throughout the LLR Property. Located towards the northern portion of the property is the historical Stahl Site which has been the subject of numerous historical and archaeological studies. LLR has hundreds of petroglyphs scattered throughout the LLR Property. We regularly find and collect arrowheads, ancient tools and other artifacts, including pottery shards. Some of these are on display at the Maturango Museum in Ridgecrest, CA. The continued operation, repair and maintenance of the existing transmission lines interfere to some extent with those valuable cultural assets.

Table 4–1: The Fossil Falls Realignment alternative again is identified to meet all project objectives and is technically feasible. This alternative would avoid direct and indirect impacts to important cultural resources.

Section 4.3.3: This describes the Fossil Falls Realignment alternative running approximately 15.8 miles long and would replace approximately 15 miles of the Proposed Project. The current I-C ROW is highly visible from the highway in an area of dramatic scenic, beauty and BLM conservation lands, including the Fossil Falls campground, which is within the BLM Fossil

Falls area of critical environmental concern. It is designated for its volcanic rock, formations, including syndrome, cone volcanoes, and a lava flow that left a deep ravine of black lava that looks like an ancient waterfall. The area has a large number of cultural and historical sites.

LLR is an active hunting and sports club. The discharge of shotguns, pistols, rifles and other firearms is a regular and ongoing recreational activity of its members. Moving the transmission lines to the east would also avoid any possible interactions between the members of LLR and the Edison employees, consultants, and representatives who may need access to the transmission lines during their operation, repair and maintenance.

The description of the area above includes all of the LLR Property. Unfortunately, the DEIR does not provide an adequate number of photographs to show the current view along US 395, looking to the east over the LLR Property, as obstructed by the transmission lines. The DEIR does include enough photographs of the area in question to show the CPUC the eyesores of the transmission lines in this area of critical importance and then present illustrations of the same area without the transmission lines, assuming they were removed and located along the Fossil Falls Realignment alternative.

Section 4.3.3.2: It is confirmed that the Fossil Falls Realignment alternative is technically feasible. The cost to obtain new private easement is anticipated to be less than the cost of the Proposed Project.

Table 4-5: This compares all of the various environmental subjects, including aesthetics, biological resources, cultural resources, tribal, cultural resources, geology, soils, and paleontology, and hydrology, water quality. As to aesthetics, the alternative would result in a beneficial impact due to permanent removal of existing structures. As to biological resources, the Proposed Project structures within Little Lake and wetlands would be removed, resulting in reduced permanent impacts to jurisdictional wetlands and/or waters. The alternative would eliminate the crossing of Little Lake, which is a stop over for migratory birds and reduce the risk of bird collision. As to cultural resources, the construction of the alternative would affect 51 eligible resources, compared to 70 with the Proposed Project segment.

Little Lake is routinely used by a variety of firefighting companies as a source of readily available water. It is a convenient source of water to combat grass and forest fires. Attached are just a couple of photographs depicting the use of Little Lake for the purposes of water replenishment during firefighting operations. The transmission lines substantially interfere with those activities as the helicopters have to maneuver around them in order to gain access to Little Lake. Remember that a portion of the transmission lines actually traverses Little Lake itself.

Just to the east of the current transmission lines is a dirt runway on the LLR Property, which is used by private pilots. The transmission poles and lines can interfere with flight operations-both landing and taking off. The relocation of the lines to the Fossil Falls Realignment alternative would eliminate this potential risk.

Section 4.3.3: This describes the Fossil Falls Realignment alternative which ends approximately 3.4 miles south of Little Lake. It would greatly reduce the visibility of this alternative from US 395. It would also move the project lines east of the existing Cinder Cone.

Section 4.3.3.2. Preliminary analysis of the Fossil Falls Realignment alternative indicates that the alternative is technically feasible. The alternative would require a new private easement, but the cost of private easement is anticipated to be less than the cost of the Proposed Project. The alternative would require land rights from LADWP and the rights to cross BLM lands, but these rights are considered potentially feasible to obtain and are similar to the rights required for the Proposed Project. The alternative meets all feasibility criteria for evaluation.

4.10.8.1: The Fossil Falls Realignment avoids some shallow ground water and potentially liquefiable alluvium that is located along the Proposed Project route where it is adjacent to Little Lake. This also supports the decision to adopt this alternative route.

Page 4-135: It is reported that the Fossil Falls Realignment would have less impact from liquidation as it is east of the Proposed Project and does not intersect with the potentially liquefiable area of alluvium with shallow ground water located near Little Lake.

Page 4-148: South of Fossil Falls is a viewing area called the Little Lake overlook. Looking to the west, it overlooks Little Lake, but also looks down on the current transmission lines. Those would be removed as part of the realignment alternative, thereby enhancing the overall benefits from the Little Lake overlook.

The primary purpose of this letter is not to oppose or object to the DEIR, but to emphasize the many positive benefits that will be obtained by electing the Fossil Falls Realignment alternative. It will lessen many existing impacts and substantially enhance the views along US 395, particularly throughout the LLR Property area. Not only is the realignment feasible, but according to the DEIR it may be less expensive than simply replacing the current transmission lines with the new structures. On balance, there should be no reason why the CPUC cannot and should not direct Edison to remove the existing transmission lines and install new towers and lines along the Fossil Falls Realignment alternative.

Very truly yours,

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/s/ Gary D. Arnold

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