

Email: SCE Ivanpah Control

From: Steve Glikbarg <glikbarg@gmail.com>
Sent: Thursday, May 14, 2026 3:27 PM
To: Forsythe, John; Susan Lee; Ivanpah-Control Project Team
Cc: Coral Cavanagh; Terry Cavanagh; Stephanie Tsai
Subject: SCE engineering meeting on Crater Mountain Realignment Alternative — Ivanpah-Control Project

Susan and John,

In advance of tomorrow's written comment deadline, I'm putting on record a summary of a meeting I held this morning with SCE engineering, land acquisitions, and project coordination staff. The meeting was the second of two engineering discussions (the first was April 27, 2026) about the Crater Mountain Realignment Alternative as it would affect 945 Birch Creek Road and the Birch Creek Community.

Attendees. SCE: Scott Lacy (engineering lead), Stephanie Tsai (land acquisitions), Marco (engineer), Lauren Kiriko (senior specialist). For the affected community: Steve Glikbarg (945 Birch Creek Road), Coral Cavanagh, Terry Cavanagh.

Substance. Scott Lacy opened by stating that SCE had not had substantive opportunity to review the four configuration options I previously raised in writing (April 29 and May 5, 2026), given the team's focus on the broader 262-mile project and the 1,200-page Draft EIR. With that caveat, SCE provided preliminary engineering views on each option:

- **Option A (fence-line modification).** SCE indicated this would be addressed during Final Engineering, anticipated "many months" after Final EIR certification. Final placement decisions would depend on integrated engineering, including DWP spacing requirements and conductor swing under wind conditions.
- **Option B (replacement-pole configurations between Structures 25 and 27).** SCE characterized this as unlikely to be feasible. The 945 Birch Creek Road parcel width is approximately 692 feet; achieving spans that keep all structures off the parcel would require pushing onto adjacent parcels with a total span approaching 800 feet, while the practical maximum span for this voltage and structure type is below 750 feet. SCE indicated an additional pole between Structures 25 and 27 would necessarily be sited on the adjacent residential parcel at 1365 Birch Creek Road.
- **Option C (partial west-side re-alignment).** SCE acknowledged this as technically feasible — SCE crosses LADWP-style corridors at multiple points in Southern California — but characterized it as impractical absent Commission direction. SCE indicated that if the Commission directs Option C as a project modification, SCE would implement it; absent such direction, SCE would not adopt Option C on its own initiative.
- **Option D (local alignment between LADWP corridor and western edge of 945 Birch Creek Road).** SCE indicated that the LADWP-spacing constraint underlying the 200-foot offset has approximately 50 feet of available flexibility — DWP requested 150 to 200 feet of separation, and SCE used 200 feet (worst case). SCE noted, however, that even shifting the

alignment 50 feet west would likely still result in the structure on or adjacent to the property line.

Tribal consultation context. SCE confirmed that the realignment alternatives — including the Crater Mountain Realignment Alternative — were directed by CPUC and BLM in response to AB 52 consultation with the Big Pine Paiute Tribe, the Fort Independence Indian Community, and other Paiute tribes of the Owens Valley. SCE indicated that the specific cultural concerns motivating the realignment are concentrated in the Crater Mountain hills — approximately two to three miles of the 14-mile alternative — where the Proposed Project would have routed the line through an area containing petroglyphs, rock art, and other resources the tribes identified as critical. SCE did not specifically mention the Lone Pine Paiute Tribe in describing the consulted tribes for this alternative. SCE also confirmed that tribal monitors will be on site during construction at every project location, consistent with Mitigation Measure CUL-1f.

Site visit. I renewed my request for an engineering site visit to the affected parcels before Final EIR certification — the third such request, following an initial request at the April 27 meeting and a written renewal on May 5. The purpose of the requested site visit was to allow SCE engineering to evaluate the terrain, the existing LADWP corridor, the parcel boundaries, and the structure-placement options at ground level rather than from GIS imagery alone. SCE declined again, indicating that any structure placement at this segment of the alternative would require at minimum an overhang easement on either side of the structure for conductor sweep, meaning that the easement on the affected property would persist regardless of fine adjustments to structure location

Fire risk. A question was raised about the comparative fire risk of siting the new corridor east of the existing LADWP transmission corridor (the current alternative) versus west of it. SCE's response addressed the reliability improvement of replacing aging infrastructure with new construction but did not substantively address the comparative position of the new corridor relative to residences.

I will be submitting written comments on the Draft EIR by tomorrow's 5 PM deadline. The substance of this morning's meeting is referenced in those comments, particularly in Section 11 (Configuration Alternatives) and the trade-off analysis in Section 4 (Environmentally Superior Alternative). I wanted you to have this summary in advance of the comment submission so that the meeting context is on the record.

Susan — separately, I would appreciate an update when convenient on the parcel-specific portion of the cultural-resources survey for 945 Birch Creek Road, which I requested April 28. I understand the confidentiality constraints associated with cultural-resources records, and any form consistent with those constraints would be useful.

Stephanie, if anything in this summary mischaracterizes what was discussed this morning, please let me know and I will correct it.

Thank you for your continued engagement on this project.

Steve Glikbarg 945 Birch Creek Road, Big Pine, CA 93513

805-729-2226

Email: SCE Ivanpah Control

From: Steve Glikbarg <glikbarg@gmail.com>
Sent: Friday, May 15, 2026 1:05 PM
To: Ivanpah-Control Project Team
Cc: Susan Lee; Forsythe, John
Subject: SCE Ivanpah-Control Project — Public Comment on Draft Environmental Impact Report
Attachments: Birch_Creek_Comment_Glikbarg.pdf

To the Aspen Environmental Group

Attached is my public comment for the SCE Ivanpah-Control Project. Please confirm receipt.

Sincerely

Steve Glikbarg

Written Comment 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: SCE Ivanpah-Control Project

Submitted by: Steve Glikbarg, owner, 945 Birch Creek Road, Big Pine, CA 93513

1. Introduction

I am the owner of a residential parcel at 945 Birch Creek Road in Big Pine, California. I submit these comments on the Draft Environmental Impact Report for Southern California Edison's Ivanpah-Control Project (Application A.19-07-015, State Clearinghouse #2020080553), with particular attention to the Crater Mountain Realignment Alternative as it would affect the parcel and the Birch Creek Community of which it is part.

These comments address analytical gaps and procedural concerns in the Draft EIR's treatment of the Crater Mountain Realignment Alternative, identify cultural and biological context the Draft EIR does not fully develop, and request that the Final EIR analyze four configuration alternatives that would reduce or avoid impacts on residential parcels in the Birch Creek Community. These comments are organized to track specific sections of the Draft EIR so that each substantive concern can be routed to the appropriate analytical chapter author, if needed.

I am one of several Birch Creek Community residents submitting written comments on this Draft EIR. Each is doing so independently, on their own terms and for their own reasons. I do not speak for the others; this comment reflects only my own observations and concerns.

2. The Affected Community

The Birch Creek Community is a small residential cluster in northern Inyo County, situated along Birch Creek Road approximately 7 miles south of Big Pine. The community lies between the existing Los Angeles Department of Water and Power (LADWP) transmission corridor to the west and US-395 to the

east. The existing LADWP corridor itself contains two high-voltage transmission lines: the Pacific DC Intertie (a 500 kV DC line operated and maintained by LADWP) on the westernmost alignment, and the LADWP 230 kV AC line east of the Pacific DC Intertie. Birch Creek itself, a perennial stream fed by Sierra snowmelt, runs west-to-east across the community's parcels, supporting riparian vegetation and a working desert oasis in an otherwise arid valley.

The parcel at 945 Birch Creek Road has been in family use since the 1970s. My family chose this location for its proximity to Birch Creek, the views west to the eastern Sierra escarpment, and the rural character of the road. The Owens Valley Indian Water Commission and the Three Creeks tribal consortium operate a property within the community. Other residents on the road include long-term homeowners, including the Gorhams (38 years of residency, who have submitted their own written comment) and Ian Walker at 1365 Birch Creek Road (who provided oral testimony at the April 30 CPUC public meeting and is preparing a written comment). At least four properties along Birch Creek Road would be within several hundred feet of the proposed Crater Mountain Realignment Alternative as currently described in the Draft EIR.

The parcel and adjacent corridor support functioning desert and riparian wildlife. I have personally observed mule deer, black bears, coyotes, foxes, rabbits, bats, and great blue herons along Birch Creek itself, over decades of regular presence on the property. The variety of fauna across multiple trophic levels — predators, prey, large mammals, raptors, riparian birds, bats — indicates significant habitat quality not adequately conveyed by the Draft EIR's general characterization of the alternative's setting as "undeveloped open space."

The parcel sits in Big Pine Paiute ancestral territory and contains documented cultural resources. SCE's own cultural resources survey identified pottery, a millstone, and arrowheads on the parcel. A round house foundation is present. The western edge of the parcel contains an extensive obsidian working area that continues onto adjacent land beneath the existing LADWP corridor. The obsidian is uniformly worked — not raw material, but evidence of sustained tool-making activity — and the material itself was carried in from elsewhere, likely from the perlite source approximately two miles away. The cultural landscape context is broader than any single feature; the place was used over time, and the evidence of that use is visible across the parcel's surface.

This parcel is part of the community through which the Crater Mountain Realignment Alternative would route a new high-voltage transmission corridor. The Draft EIR's discussion of the alternative does not analyze impacts at the community scale, and several substantive aspects of the affected environment are either treated cursorily or not at all. The remainder of this comment identifies specific places in the Draft EIR where the analysis would benefit from receptor-level treatment, and requests that the Final EIR address them.

3. Comments on Section 4.3 — Description of the Crater Mountain Realignment Alternative

Section 4.3.1 of the Draft EIR (page 4-5) describes the Crater Mountain Realignment Alternative as a 14-mile segment that would parallel the existing LADWP transmission corridor, with new SCE structures “installed on the east side of the existing LADWP transmission lines, with a separation from the eastern LADWP structures of approximately 200 feet.”

The Draft EIR notes (page 4-6) that “this realignment segment does not pass through any developed communities, but there are isolated residences along the proposed and alternative corridors.” This characterization is incomplete with respect to the Birch Creek stretch. The Birch Creek Community is not “isolated residences” but a defined, small residential community of multiple long-occupied parcels, some of which have been continuously occupied or used for over four decades. Section 4.8.14 of the same Draft EIR (page 4-59) identifies the Birch Creek Road residential cluster as the only sensitive receptor cluster within 1,000 feet on the entire 14-mile alternative. The two characterizations are difficult to reconcile.

A specific factual matter bears on the analysis. The 200-foot separation described in Section 4.3.1.1 (page 4-5) is the assumed distance between the proposed new SCE structures and the eastern LADWP structures. However, the distance from the LADWP corridor to the western edge of the 945 Birch Creek Road parcel is itself disputed. SCE’s land acquisitions team has stated, based on GIS measurement, that the parcel is approximately 230 feet from the existing LADWP transmission line. Independent on-site measurement by tape from the LADWP transmission line centerline (which lies east of the Pacific DC Intertie) to the western property line of 945 Birch Creek Road yielded approximately 128 feet. The Draft EIR’s noise analysis (page 4-59) characterizes the Birch Creek residences as “approximately 250 feet east of the Crater Mountain Realignment Alternative.” A discrepancy of more than 100 feet between competing measurements is substantial when the alternative’s structure placement depends on it. The Final EIR should either resolve the discrepancy or analyze impacts under each measurement assumption.

For the Final EIR, I request that the description of the Crater Mountain Realignment Alternative acknowledge the Birch Creek Community by name, identify the number of private residential parcels potentially affected by the alternative, and reconcile the distance measurements between the LADWP corridor and the affected parcels through licensed survey. (See Exhibit 2 for measurement documentation.)

4. Comments on Section 4.6 — Environmentally Superior Alternative

Section 4.6 of the Draft EIR (page 4-22) designates the Environmentally Superior Alternative as the combination of the three realignment alternatives (Crater Mountain, Manzanar, and Fossil Falls) with the proposed project segments connecting them. The basis for the designation is the analysis presented in Section 4.5 (Comparison of Alternatives), which compares the Proposed Project and the realignment alternatives across the environmental disciplines.

The designation as it applies to the Crater Mountain Realignment Alternative rests on incomplete analysis. The Final EIR should revisit the designation in light of the analytical gaps identified in this comment letter. Specifically:

The Aesthetics analysis underlying the designation is built around a single Key Observation Point (KOP 1-22) on US-395 and explicitly excludes any KOP along the alternative's route (Section 4.8.1, page 4-23). The visual benefit to motorists has been documented and quantified through visual simulation; the visual impact on residents within several hundred feet of the new corridor has not been formally analyzed at the receptor level.

The Cultural Resources finding for the alternative is SIGNIFICANT AND UNAVOIDABLE (Section 4.8.5, page 4-44), the same significance level as the Proposed Project Segment 1. At the substantive level, however, the alternative is associated with more cultural resources at risk: Table 4-3 of the Draft EIR documents that "construction of the alternative could affect 41 eligible resources, compared with 28 impacted by the Proposed Project segment," with "all 69 resources [potentially] affected by alternative route selection" if resources along either route cannot be avoided during structure removal. Section 4.5.1.2 confirms a similar pattern at the broader level: "there are about 15% more cultural resources eligible for the CRHR along the three alternative routes than on the Proposed Project route." The Draft EIR characterizes the alternative's additional cultural-resource impacts as short-term construction effects outweighed by the alternative's long-term benefits (Section 4.5.1.3).

The Tribal Cultural Resources finding for the alternative is also SIGNIFICANT AND UNAVOIDABLE (Section 4.8.6, page 4-46). The alternative is sited within the Owens Valley Landscape, identified through AB 52 consultation as a tribal cultural resource.

The Noise analysis underlying the designation treats the alternative's setting as "undeveloped open space" while simultaneously identifying Birch Creek Road residences at 250 feet as the only sensitive receptors on the entire 14-mile alternative (Section 4.8.14, page 4-59). The internal inconsistency of these two characterizations is discussed in Section 8 of this comment letter.

The Draft EIR's basis for designating the Crater Mountain Realignment Alternative as part of the Environmentally Superior Alternative rests on three long-term improvements over the Proposed Project: (1) aesthetic improvement, primarily through elimination of the SIGNIFICANT AND UNAVOIDABLE impact on the US-395 scenic highway corridor (Impact AE-2) and the long-term beneficial impact from removing existing structures along approximately 8 miles where the Proposed Project would be in close proximity to US-395 (Impact AE-3); (2) reduction in avian collision risk due to siting farther from the Owens River and Tinemaha Reservoir (Impact BIO-6); and (3) consulting tribes' stated preference for the alternative because it would avoid resources important to the tribes (Impact TCR-1). The Draft EIR (Section 4.5.1.3) characterizes these as long-term benefits that outweigh the alternative's short-term costs, which include approximately 40% greater ground disturbance compared with the Proposed Project Segment 1 and a larger number of CRHR-eligible cultural resources potentially affected (41 vs 28 for the corresponding Proposed Project segment).

The third basis of the designation — the tribal preference — was confirmed by SCE engineering at the May 14, 2026 meeting. SCE confirmed that the realignment alternatives were directed by CPUC and BLM in response to AB 52 consultation with the Big Pine Paiute Tribe, the Fort Independence Indian Community, and other Paiute tribes of the Owens Valley. The specific cultural concerns motivating the realignment are concentrated in the Crater Mountain hills — approximately 2 to 3 miles of the 14-mile alternative alignment — where the Proposed Project would have routed the line through an area containing petroglyphs, rock art, and other resources the tribes identified as critical. The alternative was therefore created to protect tribal cultural resources at Crater Mountain by co-locating the SCE line with the existing LADWP corridor for the realignment segment.

This context does not resolve the analytical gaps identified in these comments. The alternative's protection of tribal cultural resources at Crater Mountain is real and significant. So too are the aesthetic and biological benefits documented in the Draft EIR. But the alternative also introduces a different set of impacts at Birch Creek and elsewhere on the realignment route — including a larger number of CRHR-eligible cultural resources potentially affected (Section 4.8.5), SIGNIFICANT AND UNAVOIDABLE tribal cultural-resource impacts within the Owens Valley Landscape (Section 4.8.6), and unanalyzed receptor-level aesthetic and noise impacts at the Birch Creek Community (Sections 4.8.1 and 4.8.14). The Environmentally Superior Alternative designation as it stands therefore rests on documented long-term benefits compared against partly-quantified and partly-unanalyzed costs. The Draft EIR itself acknowledges (Section 4.6) that "CPUC decision-makers could balance the importance of each impact area differently and reach different conclusions." This comment respectfully requests that the Commission do exactly that — weight the receptor-level impacts at Birch Creek more heavily, contingent on the receptor-level analysis the Final EIR should produce.

The Final EIR should either supplement the underlying analysis to support the Environmentally Superior Alternative designation as it currently stands, or reconsider the designation in light of receptor-level analysis. The trade-off the designation embodies should be made explicit so that the Commission's eventual decision is informed by the full set of impacts the alternative would create, not only the ones the existing analysis quantifies. The understanding that issues not raised on the CEQA record may be foreclosed for later consideration is one reason these comments seek to put these analytical concerns clearly before the Commission at this stage.

5. Comments on Section 4.8.1 — Aesthetics

Section 4.8.1 of the Draft EIR (page 4-23) describes the aesthetic environmental setting of the Crater Mountain Realignment Alternative. The text states:

“Views of the Crater Mountain Realignment Alternative would be only from a few scattered, rural residences and campgrounds, Aberdeen Resort and, primarily, distant views from US 395 except for the crossing of the highway at the southern end of the alternative. Given the limited visibility of this alternative from public viewpoints and its proposed placement adjacent to a larger existing transmission corridor, there were no KOPs defined along the alternative's route.”

This is a significant analytical gap. The Draft EIR's aesthetic impact analysis for the Crater Mountain Realignment Alternative is built around a single Key Observation Point — KOP 1-22 on southbound US-395 near East Elna Road — which is positioned to capture the visual benefit of moving the line off the scenic highway corridor. No Key Observation Point was established at any of the residences whose views the alternative would directly affect. This means the Draft EIR's findings that the alternative's operations would be BENEFICIAL on Impact AE-2 (scenic-highway aesthetics) and BENEFICIAL on Impact AE-3 (visual character along US-395) rest on a one-sided record. The visual benefit to motorists on US-395 has been formally documented and quantified through the KOP methodology. The visual impact on residents — whose homes the alternative would pass within several hundred feet of — has not.

This gap is particularly significant for the Birch Creek Community. The Draft EIR's noise analysis at Section 4.8.14 (page 4-59) identifies the Birch Creek Road residential cluster as the only sensitive receptor group within 1,000 feet of the entire 14-mile alternative. It is unusual for the Draft EIR's noise chapter to identify a receptor cluster at this proximity while the aesthetic chapter declines to establish a Key Observation Point at the same receptors. The two analyses appear to disagree about whether the alternative passes affected populations.

The aesthetic concern at Birch Creek Road was raised on the public record at the second CPUC public hearing on April 30, 2026. Mr. Ian Walker, who resides at 1365 Birch Creek Road, testified that the Draft EIR's aesthetic analysis appears focused on motorists on US-395 and visitors to the Taboose campground, while residents who live within several hundred feet of both the existing LADWP corridor and the proposed new alignment are not addressed at the receptor level. Ms. Coral Cavanagh, speaking on behalf of this commenter at the same hearing, raised the same concern with respect to 945 Birch Creek Road. These observations are now part of the public record and should inform the Final EIR's response.

For the Final EIR, I request the following:

First, that Aspen establish at least one Key Observation Point at a residence within the Birch Creek Community, and conduct visual simulation analysis from that vantage point comparable to the analysis presented for KOP 1-22. 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.

Second, that the Final EIR explicitly address how the visual impact on Birch Creek residents is weighed against the visual benefit to US-395 motorists. The Draft EIR's current presentation gives quantified weight to the latter and qualitative dismissal to the former; that asymmetry is not consistent with CEQA's requirement of meaningful evaluation of impacts on affected populations.

Third, that the Final EIR's discussion of Impact AE-2 acknowledge that the alternative's elimination of the scenic-highway impact is being achieved through the introduction of new visual impacts on a receptor population the Draft EIR did not analyze at the KOP level. This is not a request to reverse the Aesthetics impact finding; it is a request to make the trade-off transparent and to ensure the Commission's decision is informed by analysis of both sides.

(See Exhibits 1 and 2 for the relationship between the existing LADWP corridor, the proposed SCE alignment, and residential parcels on Birch Creek Road.)

6. Comments on Section 4.8.5 — Cultural Resources

Section 4.8.5 of the Draft EIR (page 4-43) concludes that Impact CUL-1 — substantial adverse change in the significance of a historical resource — for the Crater Mountain Realignment Alternative is SIGNIFICANT AND UNAVOIDABLE even after implementation of all mitigation measures (CUL-1a through CUL-1i). The Draft EIR states (page 4-44): “the construction of the alternative would result in the permanent loss of portions of resources within a culturally rich and sensitive archaeological area. As

such, the impact on historical resources would remain significant and unavoidable, even after implementation of all mitigation.”

The Draft EIR identifies 41 archaeological resources considered eligible for the California Register of Historic Resources within the Direct Area of Potential Impact for the Crater Mountain Realignment Alternative — 38 precontact resources and 3 historic resources (page 4-43). These include “lithic and ceramic scatters, habitation sites, bedrock milling features, rock features, and petroglyphs.” The Direct API for the alternative consists of 320 acres (page 4-43); 41 CRHR-eligible resources within 320 acres represents a substantial concentration of cultural material.

My parcel at 945 Birch Creek Road sits within this Direct API. SCE conducted a cultural resources survey on the parcel during prior project development, identifying artifacts including pottery, a millstone, arrowheads, and an extensive obsidian working area. A round house foundation is also present on the property. These are documented cultural resources on a residential parcel where the Crater Mountain Realignment Alternative would site Structure 26.

I requested the parcel-specific portion of the cultural resources survey for 945 Birch Creek Road from Aspen Environmental Group on April 28, 2026. As of the date of this written comment, the parcel-specific report has not been provided. Aspen has indicated the archaeology team is still researching what can be shared given confidentiality concerns associated with cultural resources data. I understand the confidentiality constraints associated with cultural resources records. The practical effect is that the corridor-level analysis on which the SIGNIFICANT AND UNAVOIDABLE finding rests has not been supplemented by parcel-level analysis available to affected landowners for comment.

This raises a procedural concern. The Draft EIR’s CUL-1 conclusion for the alternative rests on corridor-level analysis. The mitigation measures (CUL-1a through CUL-1l) are designed for corridor-scale implementation. Site-level analysis of how Structure 26 placement would interact with the documented resources on this specific parcel — including where the structure foundation, work area, and any access road would fall relative to the round house foundation, the artifact concentrations, and the obsidian working area that extends across and beyond the parcel boundary — has not been disclosed to the affected landowner. I therefore cannot fully assess the adequacy of mitigation as applied to this specific parcel.

At the May 14, 2026 meeting, SCE engineering confirmed that tribal monitors will be on site during construction at every project location, consistent with Mitigation Measure CUL-1f. This is a real and welcome project-wide commitment. SCE engineering also characterized the parcel-level cultural resources at 945 Birch Creek Road as common to the broader corridor — comparable to resources widely distributed along the valley. This characterization sits in tension with the Draft EIR’s own

description of the alternative's setting as "an area of exceptionally high archaeological sensitivity and continuing cultural importance to descendant communities" (page 4-44). Both characterizations may be true at different scales: cultural resources are indeed widely present throughout the corridor, and the alternative's setting is also exceptionally archaeologically sensitive at the corridor scale. What neither characterization addresses is the parcel-level interaction between proposed structure placement and the specific documented resources at 945 Birch Creek Road. The Final EIR's treatment of CUL-1 mitigation should engage with the parcel-level sensitivity specifically.

There is an additional analytical concern. The Draft EIR's rationale for retaining the Crater Mountain Realignment Alternative (Section 4.3.1.2, page 4-6) explicitly cites cultural resources avoidance as a benefit: "this realignment segment would avoid new construction affecting cultural resources in the Fish Springs area." Yet Section 4.8.5 then concludes that the alternative itself would create SIGNIFICANT AND UNAVOIDABLE cultural-resources impacts, and Table 4-3 documents that the alternative is actually associated with more CRHR-eligible cultural resources potentially affected than the corresponding Proposed Project segment (41 vs 28). The alternative is therefore being credited with avoiding cultural impacts in one location while creating greater cultural impacts elsewhere. The Final EIR should make this trade explicit and explain how it informs the Environmentally Superior Alternative designation. (See Section 4 of this comment for the broader trade-off analysis.)

For the Final EIR, I request the following:

First, that the parcel-specific portion of the cultural resources survey for 945 Birch Creek Road be made available to the landowner in whatever form is consistent with confidentiality requirements — redacted as needed, with sensitive location information withheld, but with sufficient information to understand what resources have been identified on the parcel and how they relate to proposed structure placement.

Second, that the Final EIR include site-level analysis of how Structure 26 placement on this parcel would interact with the documented cultural resources, including the round house foundation and the extensive obsidian working area extending across the western edge of the parcel and onto adjacent land beneath the existing LADWP corridor.

Third, that the Final EIR explicitly address the trade between cultural resources avoidance at Fish Springs and the introduction of greater cultural-resources impacts elsewhere on the alternative, and explain how this trade is reflected in the Environmentally Superior Alternative analysis.

(See Exhibit 1 for SCE-provided map showing the Structure 26 work area on the parcel.)

7. Comments on Section 4.8.6 — Tribal Cultural Resources

Section 4.8.6 of the Draft EIR (page 4-46) concludes that Impact TCR-1 — substantial adverse change in the significance of a tribal cultural resource — for the Crater Mountain Realignment Alternative is SIGNIFICANT AND UNAVOIDABLE. The Draft EIR identifies the Owens Valley Landscape as the relevant tribal cultural resource and states that the Owens Valley Landscape is “situated within both the Direct and Indirect APE and is at risk of experiencing significant direct and indirect impacts from the Proposed Project.”

I am not a member of any of the Native American tribes consulted under AB 52 for this project. The substantive voice on tribal cultural resources properly belongs to the consulted tribes. I understand that the Big Pine Paiute Tribe of the Owens Valley and the Owens Valley Indian Water Commission have engaged with this proceeding, and defer to whatever those entities communicate on the substance of TCR concerns.

I note one observation that may be relevant to the Final EIR’s treatment of TCR-1. The Draft EIR states (page 4-47): “Tribal consultation has indicated that while resources of value are located throughout the Owens Valley Landscape, the more sensitive resources were along the Proposed Project route, and not along the tribal cultural resources along the Crater Mountain Realignment Alternative.” SCE engineering confirmed at the May 14, 2026 meeting that the realignment alternatives were directed by CPUC and BLM in response to AB 52 consultation focused on cultural resources at the Crater Mountain hills specifically — petroglyphs, rock art, and other resources the tribes identified as critical (see Section 4 of this comment for details). The DEIR’s characterization of “more sensitive resources along the Proposed Project route” therefore reflects the AB 52 consultation that produced the alternative: protection of the Crater Mountain area was the basis for relocating the line.

However, the AB 52 consultation that focused on Crater Mountain avoidance did not necessarily engage with the Birch Creek segment of the alternative at the structure-placement level. At the second CPUC public meeting on April 30, 2026, Ms. Santeena Pugliese — speaking as a Birch Creek resident affiliated with the Owens Valley Indian Water Commission and the Three Creeks tribal consortium — raised specific concerns about the depth of consultation on this segment of the alternative, asking which tribes had been consulted, whether tribal monitors had been on site, and what steps the project had taken for substantive consultation as opposed to documentary outreach. Ms. Pugliese identified specific cultural materials (petroglyphs and obsidian flakes) present in the landscape the alternative would disturb. These observations are now part of the public record.

The Final EIR should describe the depth and structure of AB 52 consultation that engaged with the Birch Creek segment of the alternative specifically — not the corridor-wide consultation that produced the

alternative's broader routing, but consultation focused on the structure-placement-level impacts at the parcels the alternative would cross. The Final EIR should also reconcile the DEIR's summary characterization of tribal preference for the alternative — which reflects Crater Mountain avoidance — with the concerns raised on the public record by a tribal-affiliated resident of the affected community.

8. Comments on Section 4.8.14 — Noise

Section 4.8.14 of the Draft EIR (page 4-59) describes the noise environmental setting of the Crater Mountain Realignment Alternative. The text presents an internal inconsistency that bears on the analysis.

The Draft EIR states: “The Crater Mountain Realignment Alternative would be located in undeveloped open space areas and would not pass through any developed residential areas, though it would pass near two clusters of residential properties.” (Page 4-59.) Two sentences later, the Draft EIR identifies one of those clusters specifically: “The only sensitive receptors within 1,000 feet from the Crater Mountain Realignment Alternative are a group of residential properties on Birch Creek Road, approximately 250 feet east of the Crater Mountain Realignment Alternative.”

These two characterizations are difficult to reconcile. The alternative corridor would either pass through “undeveloped open space,” or it would pass within 250 feet of a sensitive receptor cluster. Both cannot be true. The Draft EIR's noise analysis appears to apply the “undeveloped open space” framing for purposes of determining the ambient baseline (35–45 dBA Ldn, which the Draft EIR describes as “similar to ambient noise levels for undeveloped areas in Segment 1”), while simultaneously naming Birch Creek Community residences at 250 feet as the only sensitive receptors on the alternative. The result is that residential receptors are identified but not analyzed as residential receptors for purposes of establishing the noise baseline against which impacts are measured.

This is not an academic concern. Ms. Coral Cavanagh, an environmental planner who provided oral comment at the April 30, 2026 CPUC public meeting, pointed out that the assumed ambient baseline in the Draft EIR rests on a 1978 EPA reference document and noted that the assumption is unsupported by current monitoring of the Birch Creek Community area. The Birch Creek Community's actual ambient noise environment is not undeveloped — it already includes the operational noise of the existing LADWP transmission corridor (which contains the Pacific DC Intertie and the LADWP 230 kV line) at variable distance from residences. The proposed new SCE corridor would operate simultaneously with the existing LADWP corridor. The cumulative noise of the new SCE corridor and the existing LADWP corridor operating simultaneously, with combined corona-discharge noise affecting residential receptors, is an impact the noise analysis should address. The Draft EIR's analysis does not address this cumulative configuration.

Mr. Ian Walker, who resides at 1365 Birch Creek Road, testified at the same April 30 meeting that the noise impact of the existing LADWP lines is already significant when bedrooms are a few hundred feet from them.

The Draft EIR's conclusion that Impact N-1 is LESS THAN SIGNIFICANT WITH MITIGATION rests in part on Inyo County's exemption of construction noise from limits between 7:00 a.m. and 7:00 p.m. construction hours. This exemption addresses temporary, construction-period noise. It does not address the operational noise of the new corridor as a long-term cumulative impact on residential receptors over the operational life of the facility.

For the Final EIR, I request the following:

First, that the noise analysis acknowledge the actual receptor environment at the Birch Creek Community — residential, with existing LADWP corridor present — rather than applying an “undeveloped open space” framing inconsistent with the same Draft EIR's identification of the Birch Creek Community as the only sensitive receptor cluster on the alternative.

Second, that the Final EIR include day and nighttime noise monitoring at Birch Creek residences to establish actual current ambient levels (with the existing LADWP corridor energized, and during conditions conducive to corona discharge), against which proposed-project noise impacts can be measured.

Third, that the Final EIR analyze the cumulative operational noise of the new SCE corridor and the existing LADWP corridor as a long-term impact on residential receptors, and not only the construction-period noise that current Inyo County standards exempt.

(See Exhibit 2 for measurements of distances between the existing LADWP corridor, the proposed alternative alignment, and residential parcels on Birch Creek Road.)

9. Comments on Section 5 — Cumulative Impacts

Section 5 of the Draft EIR addresses the cumulative impacts of the Proposed Project together with other reasonably foreseeable projects. The cumulative analysis as it applies to the Crater Mountain Realignment Alternative does not adequately address one configuration that defines the alternative's actual receptor environment: the cumulative effect of the proposed new SCE corridor operating simultaneously with the existing LADWP transmission corridor (which contains the Pacific DC Intertie and the LADWP 230 kV line) near residential receptors.

The proposed alternative would parallel the existing LADWP transmission corridor for approximately 14 miles. At Birch Creek, the LADWP corridor passes within somewhere between 103 and 250 feet of the

affected residential parcels (the precise distance is disputed; see Section 3 of this comment). The alternative would site a new SCE 115 kV corridor approximately 200 feet east of the existing LADWP corridor, placing the new corridor closer to or directly adjacent to residences. The new SCE corridor would operate simultaneously with the existing LADWP corridor for the operational life of the project.

The cumulative aesthetic effect of the new SCE corridor operating alongside the existing LADWP transmission corridor is not analyzed at the receptor scale, because (as discussed in Section 5 of this comment) no KOP was established along the alternative's route. The cumulative noise effect of the new SCE corridor operating simultaneously with the existing LADWP corridor — including combined corona-discharge noise under varying weather conditions — is not analyzed (as discussed in Section 8 of this comment); the noise analysis treats the alternative as if it were entering an undeveloped environment rather than joining an existing operational corridor. The cumulative effect on electric and magnetic fields from the new SCE corridor operating simultaneously with the existing LADWP corridor near residences is also not addressed in the analysis at the receptor level for the alternative configuration.

For the Final EIR, I request the following:

First, that the cumulative impact analysis specifically address the configuration of the new SCE corridor operating simultaneously with the existing LADWP transmission corridor near the Birch Creek residential cluster, across the relevant disciplines (aesthetics, noise, EMF).

Second, that the analysis use the actual configuration (existing LADWP plus proposed new SCE) rather than treating the new corridor as if it were entering an undisturbed environment.

10. Comments on Section 4.8.20 — Wildfire

The Crater Mountain Realignment Alternative would site a new high-voltage transmission corridor in a fire-prone region of the Eastern Sierra, immediately adjacent to occupied residential parcels. Section 4.8.20 of the Draft EIR (page 4-67) addresses wildfire impacts of the alternative, but does not address one impact relevant to affected residents: the cumulative effect of the new SCE corridor operating alongside the existing LADWP transmission corridor on the wildfire risk environment of the adjacent residential community, including documentable effects on insurability that signal real-world risk perception.

California's homeowner insurance market has responded to wildfire risk in rural, high-risk areas with non-renewals, premium increases, and refusals to write new policies, particularly in fire-prone zones near transmission infrastructure. Insurance carrier risk assessments are relevant CEQA evidence to the extent they reflect a documentable real-world response to the cumulative fire-risk environment of an area. The siting of a new transmission corridor immediately adjacent to occupied residences in an area

already subject to wildfire risk is reasonably likely to affect the insurability of those residences, with associated effects on the residents' ability to maintain coverage, refinance, or transfer the property.

At the May 14, 2026 meeting, the question of relative fire risk between siting the new corridor east of the existing LADWP transmission corridor (the current alternative) versus west of it was raised. SCE's response addressed the reliability improvement of replacing aging infrastructure with new construction (true and acknowledged), but did not substantively address the comparative position of the new corridor relative to residences. The position of a new transmission corridor relative to occupied homes is a material factor in fire-risk analysis at the receptor level, separate from the reliability characteristics of the infrastructure itself.

For the Final EIR, I request that the wildfire impact analysis for the Crater Mountain Realignment Alternative specifically address the cumulative effect of operating the new SCE transmission corridor alongside the existing LADWP transmission corridor on the wildfire risk environment of the Birch Creek Community, including consideration of insurance market response as a documentable indicator of risk perception and the comparative effect of siting the new corridor east versus west of the existing LADWP corridor. The analysis should consider the alternative's contribution to risk in the context of the existing LADWP corridor already present, not as if the new corridor were entering an environment without high-voltage infrastructure.

11. Configuration Alternatives Requested for Final EIR Analysis

The Draft EIR's analysis of the Crater Mountain Realignment Alternative assumes a specific configuration: the new SCE structures sited approximately 200 feet east of the existing LADWP transmission line, on the existing planned alignment, with Structure 26 sited on the 945 Birch Creek Road parcel. Other configurations are possible that would reduce or avoid impacts on residential parcels in the Birch Creek Community without affecting the potential for the alternative to meet the broader objective of consolidating the SCE corridor with the existing LADWP corridor.

I raised four configuration options with SCE in writing on April 29 and May 5, 2026. The options were initially identified following an April 27 meeting between SCE land acquisitions, engineering, and project coordination staff and this commenter, and were refined through subsequent correspondence. The four options as currently described are summarized below.

Option A — Fence-line modification with dedicated access road. This option would involve modifying the western fence line of 945 Birch Creek Road so that the structure currently preliminarily planned as Structure 26 sits just outside the property boundary. SCE would build a new dedicated access road to the structure rather than using the existing gate. This option would not add structures anywhere on the

alignment and would not change span lengths. It would change who holds the strip of land at the western boundary. (See conceptual drawing in Exhibit 3-A.)

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. The 1,500-foot run between Structures 25 and 27 would be split into shorter spans, all satisfying the 750-foot maximum span constraint. The engineering team should evaluate first whether a two-pole replacement can satisfy both constraints, and only if it cannot, whether a three-pole replacement can. The goal would be to keep the modification contained between Structures 25 and 27 with no cascade effect on the siting of any other structures. (See conceptual drawing in Exhibit 3-B.)

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 would require LADWP-corridor crossings and a different structure type for the angle points (SCE's land acquisitions advisor has noted that any deviation from the straight-line alignment would require a larger-footprint tower). 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. (See conceptual drawing in Exhibit 3-C.)

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 Exhibit 3-D.)

On May 14, 2026, SCE land acquisitions, engineering, and project coordination staff met again with this commenter to discuss the four configurations. SCE's engineering lead opened by acknowledging that SCE had not had substantive opportunity to review the configurations in detail, given the team's focus on the broader 262-mile project and the 1,200-page Draft EIR. With that caveat, SCE provided preliminary engineering views on each option. On Option A, SCE indicated that fence-line modification would be addressed during Final Engineering — anticipated “many months” after Final EIR certification — with final placement decisions depending on the integrated engineering process, including DWP

spacing requirements and conductor swing under wind conditions. On Option B, SCE characterized the replacement-pole configuration as unlikely to be feasible: the parcel width is approximately 692 feet, achieving spans that keep all structures off the parcel would require pushing onto adjacent parcels with a total span approaching 800 feet, and the practical maximum span for this voltage and structure type is below 750 feet. An additional pole between Structures 25 and 27 would necessarily be sited on the adjacent residential parcel at 1365 Birch Creek Road. On Option C, SCE acknowledged the configuration as technically feasible — SCE crosses LADWP-style corridors at multiple points in Southern California — but characterized it as impractical absent Commission direction. SCE indicated that if the Commission directs Option C as a project modification, SCE would implement it; absent such direction, SCE would not adopt Option C on its own initiative. On Option D, SCE indicated that the LADWP-spacing constraint underlying the 200-foot offset has approximately 50 feet of available flexibility — DWP requested 150 to 200 feet of separation, and SCE used 200 feet (worst case). SCE noted, however, that even shifting the alignment 50 feet west would likely still result in the structure on or adjacent to the property line.

SCE also declined a renewed request for an engineering site visit to the affected parcels before Final EIR certification. SCE's reasoning was that any structure placement at this segment of the alternative would require at a minimum an overhang easement on either side of the structure for conductor sweep, meaning that the easement on the affected property would persist regardless of fine adjustments to structure location.

For the Final EIR, I request that SCE be required 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. The May 14, 2026 meeting was useful as a preliminary engagement, but SCE's representations were explicitly characterized as preliminary and not based on substantive engineering analysis. The Final EIR is the appropriate place for formal engineering and cost evaluation of these configurations, with the evaluation informing the Commission's eventual decision on the Crater Mountain Realignment Alternative. Specifically: the fence-line modification described in Option A should be evaluated for inclusion in the Final EIR's recommended configuration, not deferred to Final Engineering after EIR certification; the geometric feasibility of Option B's minimum-pole replacement should be subject to formal analysis with documented constraint assumptions; the engineering and cost analysis of Option C should be documented sufficiently for the Commission to determine whether to direct its implementation; and the available DWP-spacing flexibility identified at the May 14 meeting should be exercised in favor of moving the new corridor west toward LADWP within the 150-foot minimum DWP separation, with documentation of the resulting structure placement on or adjacent to the 945 Birch Creek Road parcel.

(See Exhibits 3A through 3D for visual representations of the existing alignment, the relationship of the alternative alignment to the affected parcels, and the four configuration options.)

12. Specific Requests

For the Final EIR, I respectfully request the following:

1. That the Final EIR establish at least one Key Observation Point at a residence within the Birch Creek Community, with visual simulation analysis comparable to that conducted for KOP 1-22 from US-395.
2. That the Final EIR include site-specific noise monitoring at Birch Creek Community residences to establish actual current ambient levels with the existing LADWP corridor operating, and analyze the cumulative operational noise of the new SCE corridor and the existing LADWP corridor as a long-term impact on residential receptors.
3. That the parcel-specific portion of the cultural resources survey for 945 Birch Creek Road be made available to the landowner in whatever form is consistent with applicable confidentiality restrictions.
4. That the Final EIR include site-level analysis of how Structure 26 placement on 945 Birch Creek Road would interact with documented cultural resources on the parcel, including the round house foundation and the obsidian working area extending across the western edge.
5. That the Final EIR address the trade between cultural-resources avoidance at Fish Springs and the introduction of greater cultural-resources impacts at the Birch Creek Community and elsewhere on the alternative alignment.
6. That the Final EIR document the depth of AB 52 consultation that engaged with the Birch Creek segment of the alternative specifically, distinct from the corridor-wide consultation that produced the alternative's broader routing, and reconcile the DEIR's summary characterization of tribal preference with concerns raised on the public record by tribal-affiliated residents of the affected community.
7. That the Final EIR analyze cumulative impacts on residential receptors of the new SCE corridor operating simultaneously with the existing LADWP transmission corridor (which contains the Pacific DC Intertie and the LADWP 230 kV line), with respect to aesthetics, noise, and electric/magnetic fields.
8. That the Final EIR's wildfire analysis address the cumulative wildfire risk to adjacent residential receptors and consider documentable insurance market response as an indicator of risk

perception, including the comparative effect of siting the new corridor east versus west of the existing LADWP corridor.

9. That SCE be required to formally evaluate Options A, B, C, and D as configuration alternatives, with engineering and cost analysis documented in the Final EIR, rather than deferring such analysis to Final Engineering after Final EIR certification.
10. That the Final EIR reconsider the Environmentally Superior Alternative designation in light of the receptor-level analysis requested above, or supplement the underlying analysis to support the designation as it currently stands.
11. That a site visit by SCE's engineering team be conducted on the affected parcels before Final EIR certification, to support the engineering evaluation of the configuration alternatives requested above.
12. That the Final EIR's description of the Crater Mountain Realignment Alternative acknowledge the Birch Creek Community by name, identify the number of private residential parcels potentially affected, and resolve the distance discrepancy between competing measurements through licensed survey.

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,

Steve Glikbarg

945 Birch Creek Road

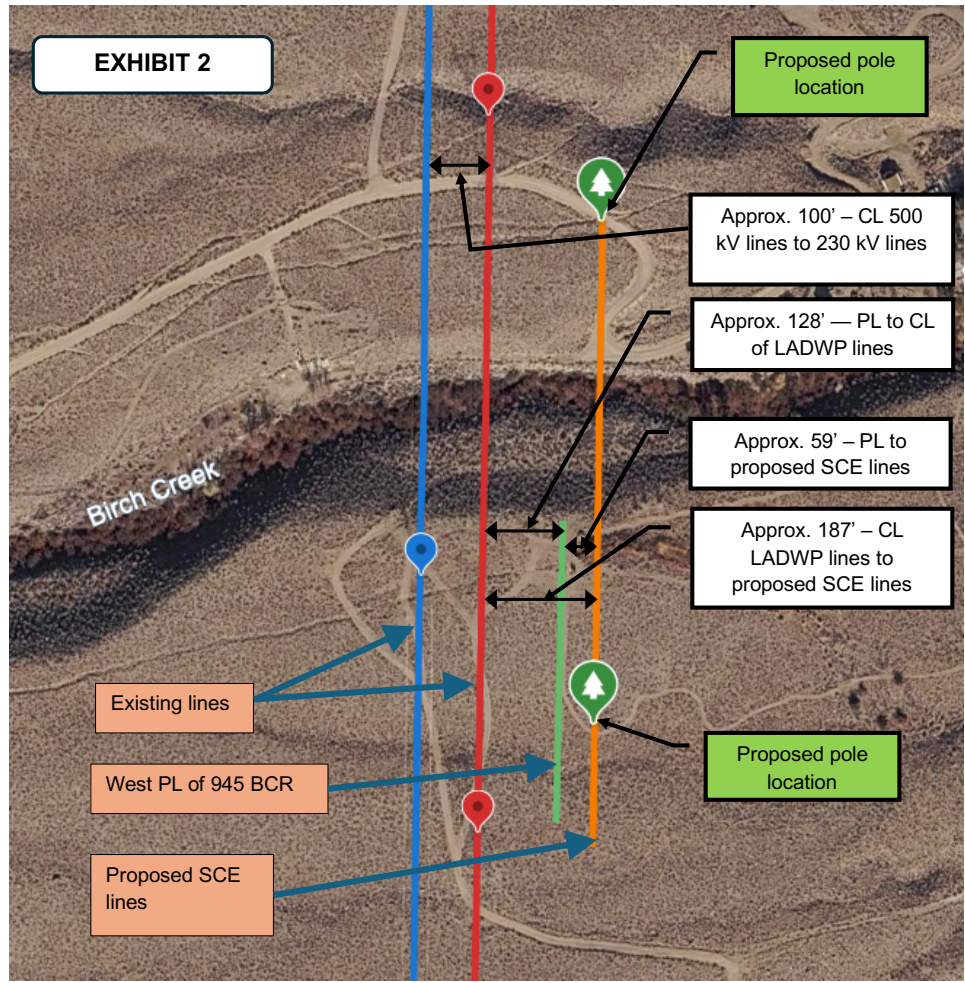
Big Pine, CA 93513

glikbarg@gmail.com

EXHIBIT 1



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



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).

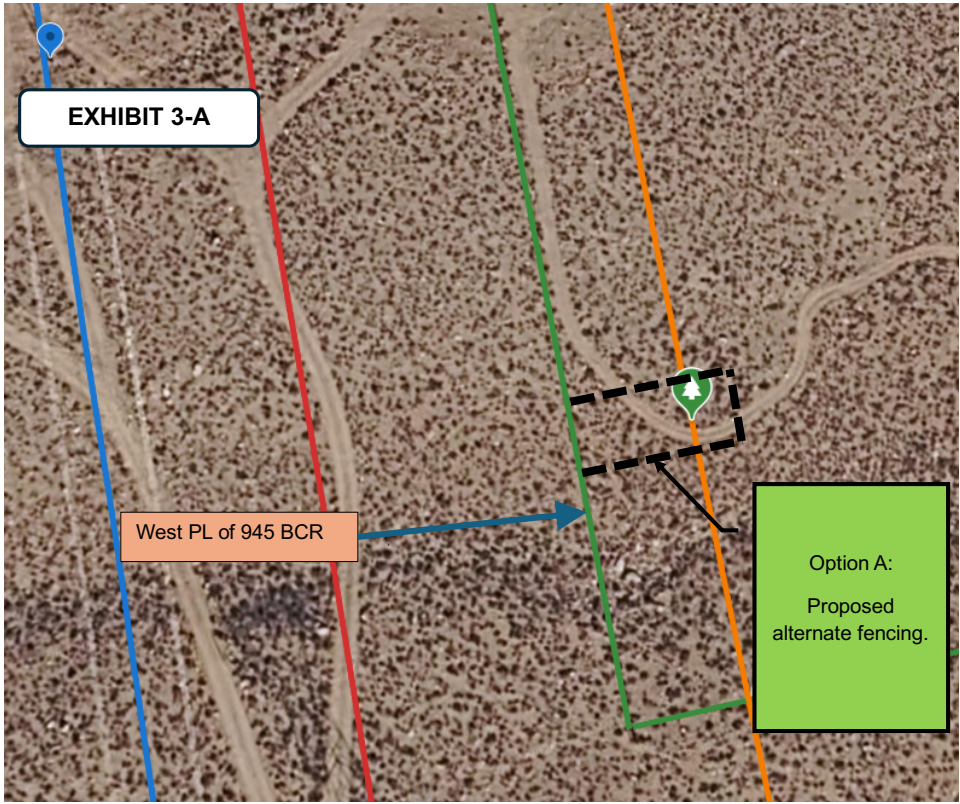
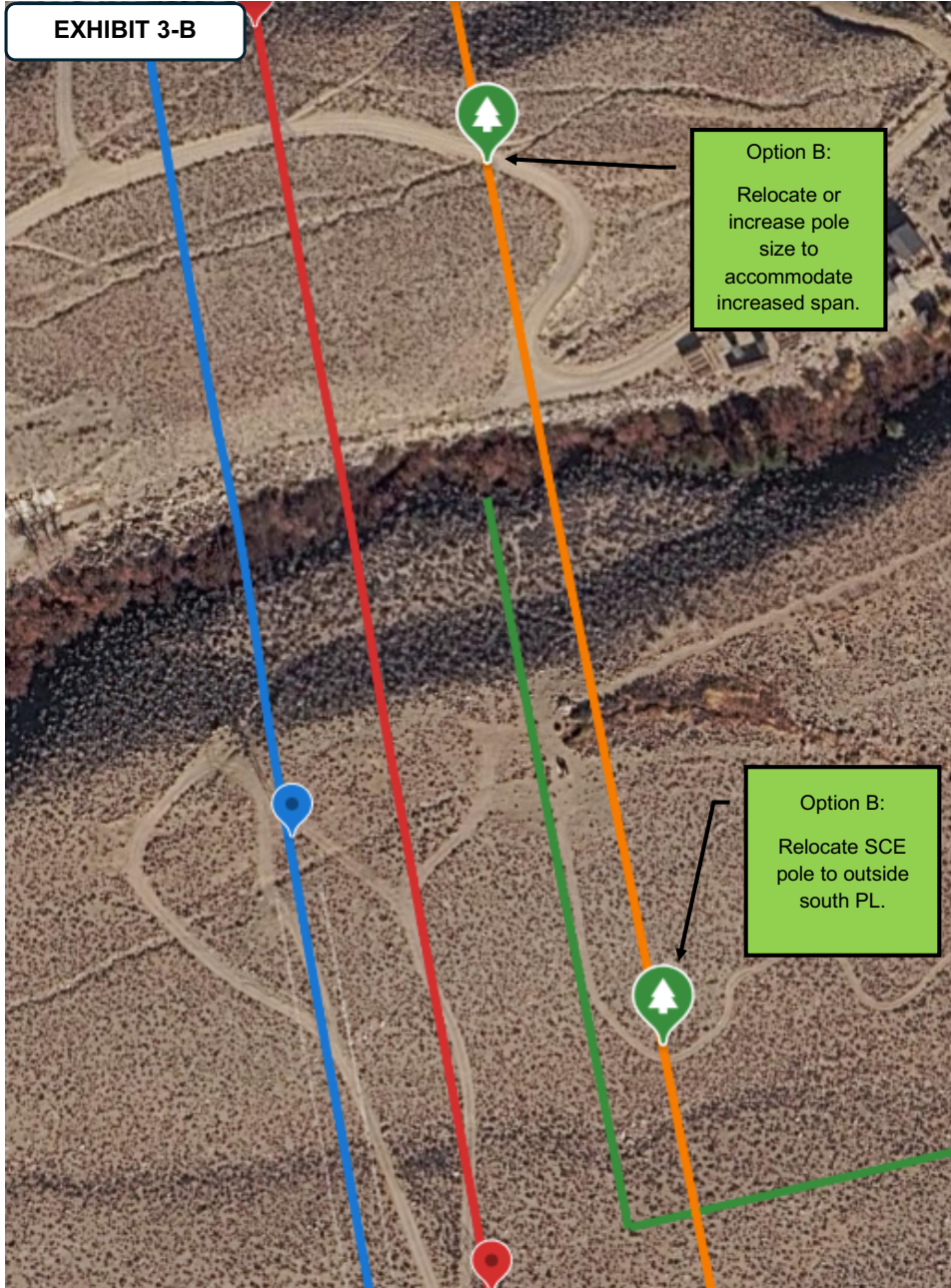


EXHIBIT 3-B



Option B:
Relocate or
increase pole
size to
accommodate
increased span.

Option B:
Relocate SCE
pole to outside
south PL.

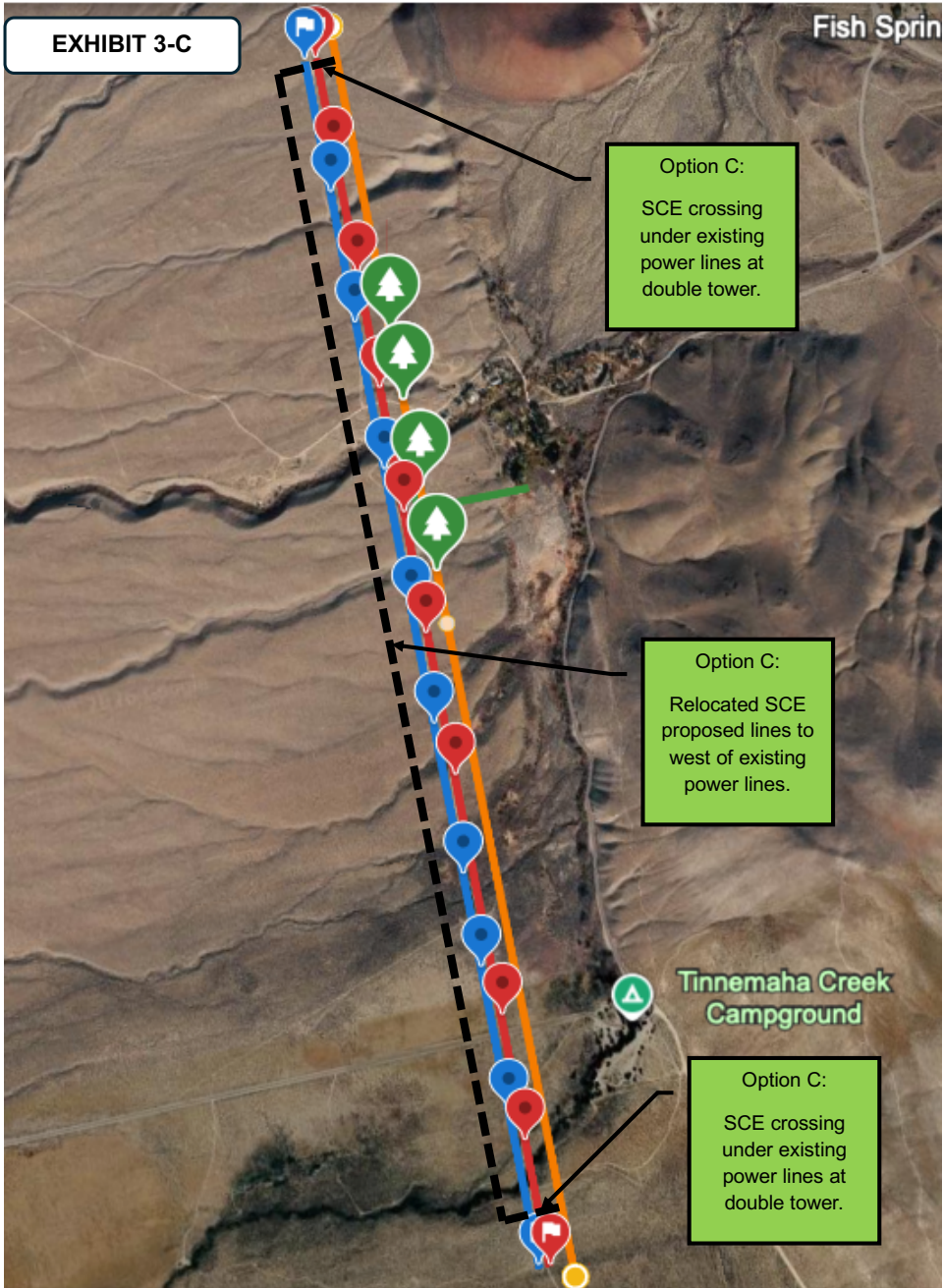


EXHIBIT 3-D

