



# United States Department of the Interior

NATIONAL PARK SERVICE  
Manzanar National Historic Site  
P.O. Box 426  
Independence, CA 93526-0426



IN REPLY REFER TO:

1.B. (MANZ)

September 29, 2020

John Forsythe, Environmental Project Manager  
California Public Utilities Commission  
c/o Aspen Environmental Group  
235 Montgomery Street, Ste 640  
San Francisco, CA 94104

Dear Mr. Forsythe:

Manzanar National Historic Site ("Manzanar") appreciates the opportunity to provide scoping comments on the proposed Ivanpah-Control project.

As we discussed in our September 14<sup>th</sup> meeting, the boundary of Manzanar is located approximately a mile away from the proposed project. The National Park Service manages this property for the long-term preservation of nationally significant cultural resources as well as to provide for the protection of these lands in the remote area of eastern California. Since 2015, annual site visitation has trended upwards with an average of over 103,000 people, generating over \$12 million of local economic activity and supporting 129 jobs. Visitors come from around the world to learn about the experiences of the 11,070 individuals incarcerated at Manzanar during World War II (WWII). A visit provides a virtually unchanged landscape with its sparsely populated small rural and remote communities. Once here, individuals are invited to consider not only the living conditions of those incarcerated but most importantly our U.S. Constitution and the protections it promises at a place where (not too long ago) they were largely ignored.

We recognize the important role of upgrading the existing historic electrical transmission line east of the site. These comments are offered as potential mitigation to ensure the continued preservation and stewardship of the site and its associated historic resources, as well as reducing the impacts to visual resources of the surrounding landscape.

## Aesthetics

Environmental setting is an important component to the overall experience for

visitors and for individuals that were incarcerated at Manzanar. In 1985, Manzanar was designated a National Historic Landscape. The setting is an extraordinary area that has been spared the impacts of residential and commercial development. The area provides a unique place where the landscape remains mostly unchanged since the early 1900s resulting in the incidental preservation of the wide-open spaces that existed in the 1940s.

Concern: The viewshed at Manzanar is well preserved and a significant theme for the site as identified in Manzanar's Foundation Document (2016): *"Landscape and Scenery: Located in the Owens Valley between the towering Sierra Nevada and Inyo Mountains, the dramatic landscape surrounding Manzanar is remarkably unspoiled. As a result, it powerfully communicates the visual and environmental conditions experienced by Japanese Americans imprisoned at Manzanar during World War II."*

The existing transmission line consists of lattice towers approximately 70 feet tall. These towers blend into the background and are part of the historic viewshed. We understand the poles proposed for SCE's Ivanpah Control TLRR project to be Tubular Steel Poles and Laminated Wood System Mono Poles ranging in height from 88 to 125 feet, and increase of up to 55 feet from the existing towers. The increase in height and the changes in tower structure and materials will combine to increase visual impacts.

Recommendation:

We recommend that the environmental analysis follow the Inyo County Renewable Energy General Plan Amendment which encourages siting, orientation and screening to avoid, minimize or mitigate significant changes to the visual environment. NPS recommends using lattice towers where possible to minimize the changes to the visual environment in the areas within three miles of Manzanar (North and South). In cases where the proposal removes existing lattice towers, if new lattice structures cannot be installed, we recommend no more than five mono pole structures per mile, painted to blend into the landscape and reduce glare. The environmental impacts analysis will need additional visual simulations to determine adequacy of minimal impact to the existing viewshed, including the Manzanar Cemetery and associated historic resources such as the Manzanar Reservoir. We recommend no changes to the lattice towers in the immediate vicinity of the historic sewage treatment plant. Additionally, the historic transmission line and sewage treatment plant could be interpreted on-site with professionally designed panels. Site restoration at the location of the sewage treatment plan could mitigate impacts from the project.

### Recreation/Visitation

Concern:

1. Visitor Traffic Conflict - The Site's peak season is from April to October and

monthly visitation ranges from 12,000 – 13,000 during peak months. All visitors traveling to the site use Highway 395. Heavy construction traffic would impact traffic safety on the highway at the site's two entry/exits to Highway 395.

Recommendation: Coordinate with NPS to schedule work in this area during lower traffic use periods, and to ensure that visitors can safely access the site when traffic flow is temporarily diverted or changed.

Concern:

2. Contractor Material Yard - The Manzanar Airfield (an associated historic resource) is located immediately adjacent to Highway 395 east of the site's north entrance. In response to a briefing we provided to Southern California Edison (SCE) and the Bureau of Land Management (BLM) in May, we were told the contractor material yard would be relocated to minimize impacts. Nonetheless, materials recently provided to NPS (September 2020) include the original location for materials storage/laydown. In a May 26, 2020 email from SCE Senior Advisor, Shannon Stewart, confirmed elimination of this use based on the briefing as follows:

*“SCE appreciates the discussion this week regarding the Manzanar National Historic Site and National Historic Landmark and follow-up providing data layers for the Old Spanish National Historic Trail. We wanted to inform you that Warnetta and her team were able to meet and discuss the laydown yard in proximity to the Manzanar Site that you expressed concerns about. SCE has determined that it is feasible to remove that laydown yard from the project scope entirely. For the purposes of your comments on the Plan of Development, you can assume that the laydown yard will not be carried forward as an element of the project.”*

Recommendation: Eliminate or relocate the material storage area from the Manzanar Airfield to a different area. Update project files to reflect the decision confirmed by Shannon Stewart on May 26, 2020. Suspend use of heavy equipment and/or helicopter during the last week of April to avoid conflicts with the annual Manzanar Pilgrimage.

#### Cultural Resources:

As stated above, the site was established to preserve the site of incarceration during WWII, but in addition, we also preserve several layers of history including the former Town of Manzanar and Indigenous use associated with the area.

Concern: Many prehistoric and historic resources exist adjacent to SCE's transmission line. There is a high potential for adverse impact to these resources from

construction on the transmission line. Manzanar is one of the most intact examples of the ten US WWII incarceration centers; further disturbance will compromise its historical integrity by impacting important contributing features and associated resources like the sewage treatment plant, historic town resources, and pre-historic sites.

Recommendation: Avoid ground disturbance in areas where cultural resources exist. If avoidance is not possible, we recommend off-site mitigation consisting of amending the National Register Nomination for the Relocation Center to include **all** cultural resources in the original WWII boundary of the camp and completing a National Register Nomination for the Town of Manzanar.

### Air Quality

Air quality is an important component of the overall visitor experience at the park.

Concern: Surface soils at the site are highly erodible. During construction of the project, the mitigation measures must control fugitive dust.

Recommendation: The NPS recommends that the project include a clearly defined plan for air quality monitoring at the site boundary throughout construction, including a responsible party and funding source for the monitoring, and also include an adaptive management plan for fugitive dust. A temporary air quality station can be located at Manzanar to ensure that PM10 and PM2.5 are not elevated and unhealthy for visitors and employees.

Thank you for the opportunity to comment. If you have any questions or comments, please contact me at 760-876-2194 or [bernadette\\_johnson@nps.gov](mailto:bernadette_johnson@nps.gov).

Sincerely,

*Bernadette Johnson*

Bernadette Johnson  
Superintendent