



Eastern Sierra Council of Governments (ESCOG) Joint Powers Authority Agenda

STAFF REPORT

To: ESCOG Joint Powers Authority
From: Kristen Pfeiler, ESCOG staff
Subject: Approve Submission of Environmental Protection Plan Applications for Regional Riparian Vegetation Management
Meeting date: December 11, 2025
Attachments: Draft EPP Application and site locations

Discussion:

In March 2025, Governor Newsom declared a statewide state of emergency to accelerate critical forest management and wildfire prevention projects. Specifically, the proclamation allows streamlining under CEQA allowing local agencies to submit Environmental Protection Plan (EPP) applications to increase the pace and scale of wildfire prevention projects.

Over the past few months, the Eastside Riparian Working Group (Working Group) has coalesced as an informal collaboration of agencies, tribes, and local partners focused on treating streambeds that often act as the primary carriers of wildfire into communities. Historically, restoration and fuel reduction work in riparian areas has been slowed by complex permitting requirements. With the Governor's Proclamation suspending CEQA and certain permits, we now have a unique opportunity to advance these high-risk sites to shovel-ready status. The project specifications for each site will adhere to the requirements outlined in the EPP associated with this streamlining process. Applications are due by December 31, 2025. Implementation needs to begin by October 15, 2026 and must be completed within two years after starting and five years if the proposal is submitted by a state agency and/or is funded through certain state grants. Both CA Dept of Fish and Wildlife along with Lahontan Waterboard have been involved in the planning efforts to help strategize the best permitting pathway for each site, as not all sites and treatments needed are allowable or best achieved under the EPP. The goal is not to clear out these riparian areas, but to make them healthier and reduce the chance of a damaging fire reaching our communities.

ESCOG is one of many partners advancing high-risk riparian corridors through the EPP process across the region. CAL FIRE is leading applications for Lone Pine, Three Creeks, Big Pine, Wilkerson, and several Bishop-area sites; LADWP is leading efforts in Independence and Oak Creek/Fort Independence. The Bishop Tribe is exploring NRCS funding as an alternative pathway. The University of California is preparing the

SNARL application. Mono County is being asked to lead Lundy Canyon, Lee Vining, and Walker. Tom's Place/Sunny Slopes and parts of West Bishop and the Greater Bishop area still require identification of a lead agency. Other communities impacted by riparian corridor proximity considered by the working group in Mono County, such as the June Lake Loop, Lee Vining and Mono City are included in the Western Mono Basin Wildfire Planning project.

The following areas have been identified as priority applications where ESCOG is the preferred sponsor:

Greater Bishop Area:

Southern California Edison (SCE) has requested support from the Working Group to expand vegetation management and fuel reduction treatments along the Birchim Circuit, focused on riparian corridors intersected by the Birchim electrical circuit. This circuit services the communities of Paradise, Swall Meadows, Round Valley/Rovana, 40 Acres, Mustang Mesa, Rocking K, West Bishop, Starlite, and Aspendell. The entire circuit experiences frequent and sustained Public Safety Power Shutoff (PSPS) events due to high wind conditions and elevated ignition risk. Currently, PSPS is one of the most effective ways SCE can mitigate potential ignitions from spreading rapidly into communities. Because this circuit is long and geographically diverse, de-energization affects all these communities even when only specific segments present risk. SCE has identified that targeted risk mitigation in riparian corridors, particularly where utility lines cross dense vegetation, could reduce ignition risk and allow for more refined PSPS decisions, decreasing the burden on communities. However, many of these high-risk riparian areas fall outside SCE's utility right-of-way or authority, meaning SCE cannot treat them under its routine line-clearance programs and needs a partner-driven approach.

Because the Birchim Circuit impacts communities in both Inyo and Mono Counties, ESCOG is an ideal partner to serve as the applicant for SCE's expanded vegetation management work under the EPP. ESCOG would lead the application and coordinate across agencies through the Eastside Riparian Working Group, while SCE would provide arborist expertise, risk data, and implementation support where feasible. ESCOG staff will continue working with SCE and partners to identify where personnel or operational resources can directly contribute to project implementation.

West Bishop:

Several locations in the Bishop/West Bishop area have been identified as high-priority risk areas. Places along Reata Rd and Plant 6 are among the top areas of concern. The Bishop Paiute Tribe is likely going to work with the Natural Resources Conservation Service to address areas leading onto the Reservation. Site visits for the Bishop area are underway to delineate exact project areas.

Tom's Place/Sunny Slopes:

This treatment location covers roughly one-third of a mile along Rock Creek on LADWP-owned land. This section of Rock Creek runs right through the middle of

Tom's Place, transects Highway 395, and creates access and egress issues for Sunny Slopes by bifurcating the Owens Gorge Road.

Advancing these sites through the EPP application process could make the projects shovel-ready for state or federal implementation funding in 2025–2026. Completing applications will require staff time to coordinate with landowners, partner agencies, and the state review team. Acting as the sponsoring lead agency would also place associated administrative and compliance responsibilities on ESCOG. If projects are not initiated by October 15, 2026, the EPP for the treatment site will be void.

Completing this application provides the Secretaries and their state agencies all needed information to determine if suspension can be granted consistent with the Governor's proclamation. Project proponents will receive notification within 30 calendar days if their application has been approved. Staff anticipates CDFW and CalFire will additional feedback after the application is submitted.

BUDGET IMPACTS:

None.

LEGAL REVIEW:

ESCOG Counsel Vallejo has reviewed this item and found that it complies with the law.

Recommended Action:

Direct staff to submit Environmental Protection Plan applications for high-priority treatment locations identified through the Eastside Riparian Working Group, including those without an existing sponsoring agency, and continue developing a collaborative framework within the Eastside Riparian Working Group for coordinated implementation.

Birchim Circuit Priority Areas (not including private or federal landownership):

Figure 1. West Bishop

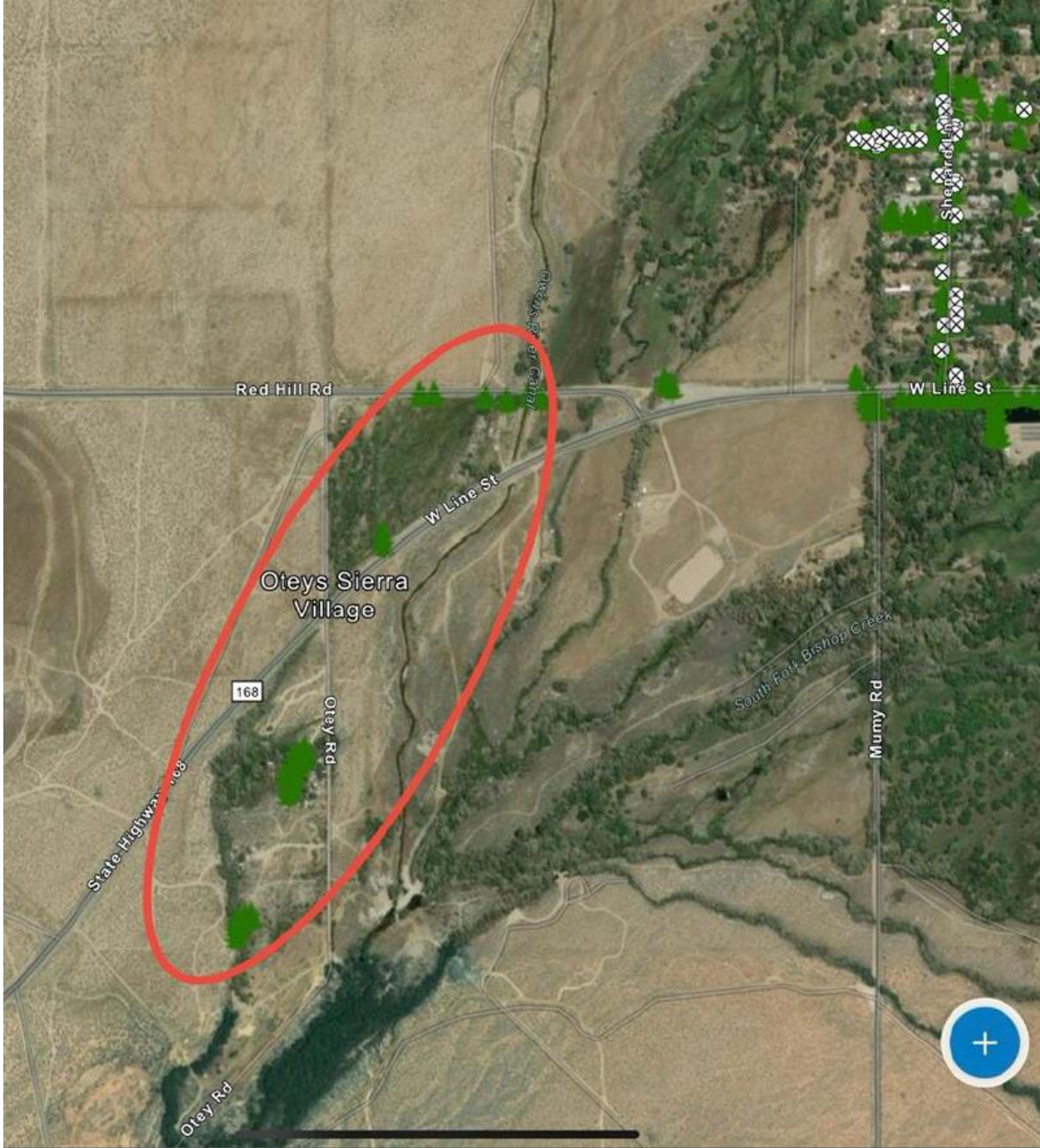


Figure 2. West Bishop – Reata

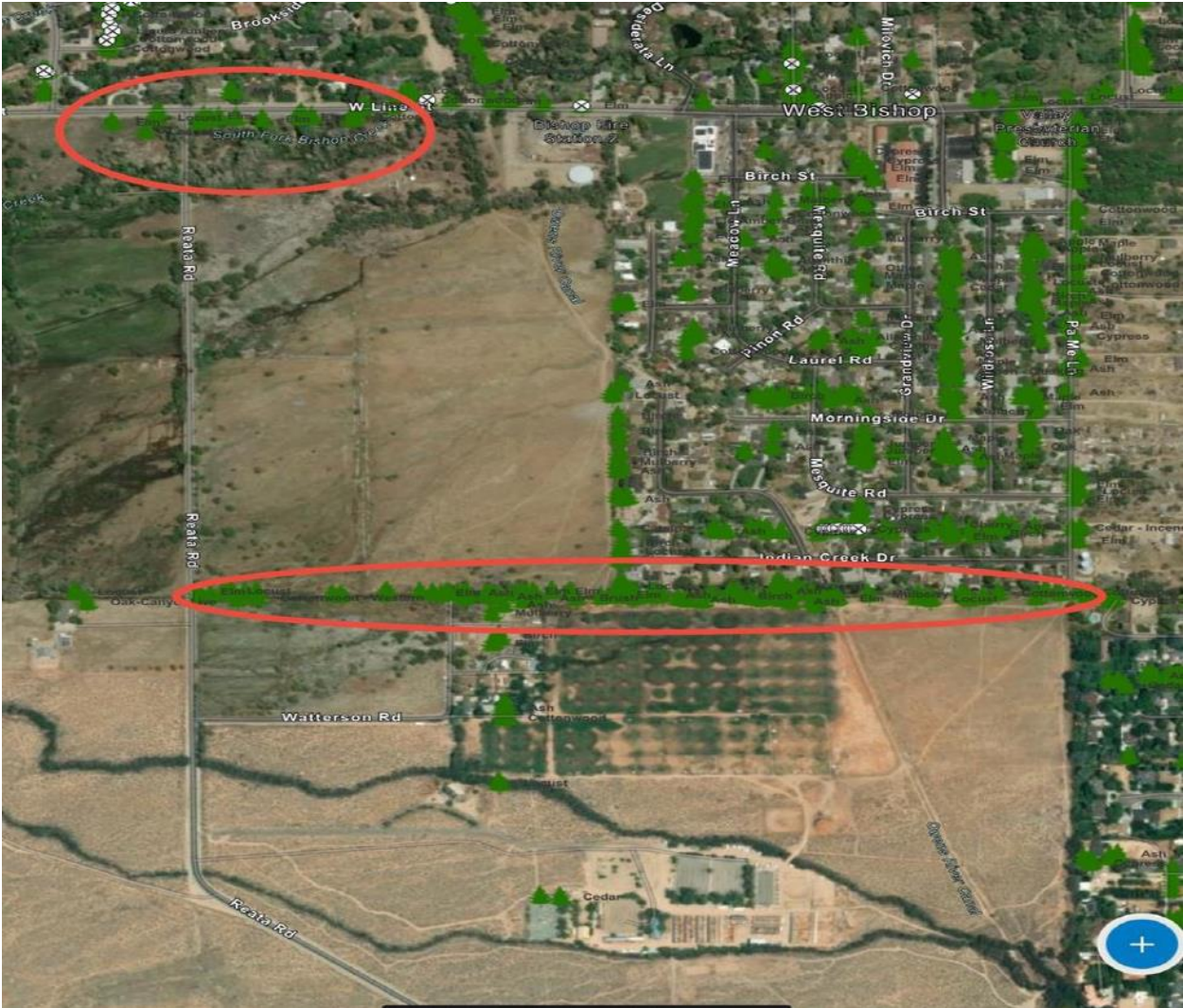


Figure 3. Starlite – McGee Creek



Figure 4. Bishop Creek - SCE Parcels



Figure 5. Millpond



Figure 6. Mustang Mesa



Figure 7. Round Valley

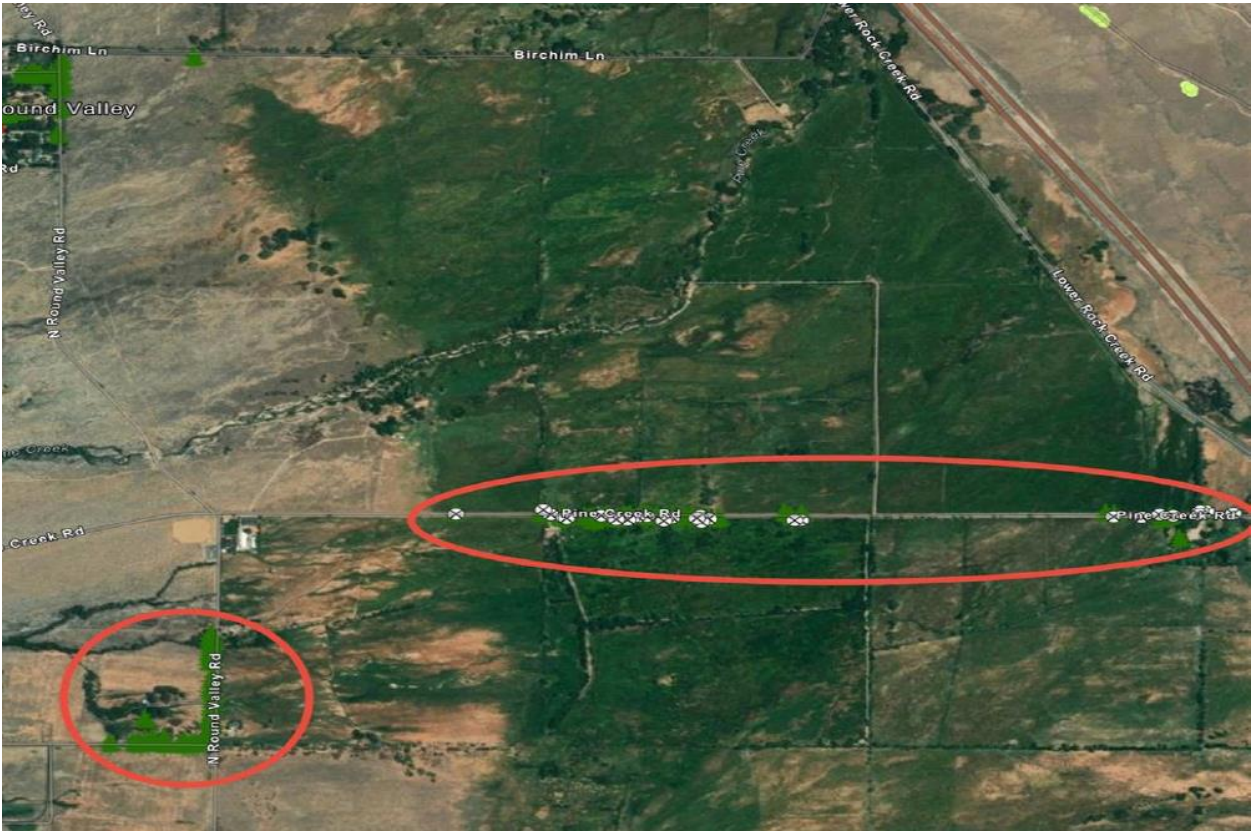


Figure 8. Rovana



DRAFT ENVIRONMENTAL PROTECTION PLAN APPLICATION FOR BIRCHIM CIRCUIT TREATMENT LOCATIONS

Request to Suspend State Statutes and Regulations Application Questions

Version: July 10, 2025

Project Overview

- **Project Name**
Birchim Circuit Riparian Resilience Project
- **Project Land Area (Acres)** (Please provide the approximate footprint acres for treatments, not to exceed 3,000 acres total. Footprint acres are calculated through spatial analysis to ensure every acre that will experience one or more treatments within the Suspension approval lifespan is accounted for.)
TBD
- **Proposed Commencement Date** (Note: Proposed commencement date must be after 08-10-2025 in order to provide time for application review. Additionally, on the ground fuel reduction operations must commence no later than 10-15-2026.)
1/30/2026
- **Target Completion Date** (Please note that project work should conclude no later than 2 years after initiating work on the ground. If more time is required, applicant must notify CNRA and CalEPA in advance of expected end date. In addition, please note that notice of project termination must be submitted to agencies when work is completed.)
10/15/2031
- **Primary Project Objectives** (checklist of below)
 - ✓ Removal of hazardous, dead, and/or dying trees
 - ✓ Removal of vegetation for the creation of strategic fuel breaks as identified by approved fire prevention plans, including without limitation, CAL FIRE Unit Fire Plans or Community Wildfire Preparedness Plans
 - Removal of vegetation for community defensible space
 - ✓ Removal of vegetation along roadways, high-ways, and freeways for the creation of safer ingress and egress routes for the public and responders and/or to reduce roadside ignitions
 - Removal of vegetation using cultural traditional ecological knowledge for cultural burning and/or prescribed fire treatments for fuels reduction
 - Maintenance of previously established fuel breaks or fuels modification projects

- **Cooperating agencies and/or resources** (Please list any local, state, federal, tribal or private cooperating agencies and/or resources. If there are no anticipated cooperating agencies or resources, state 'None'.) (600 characters)

In 2025 the Eastside Riparian Resilience Working Group was formed to address critical riparian fuel reduction needs throughout Inyo and Mono Counties; this project was identified and developed as part of this larger initiative. Working group members include CAL FIRE, CDFW, Lahontan RWQCB, LADWP, Whitebark Institute, Inyo County, Mono County, various federal partners, and other local representatives, including local Fire Protection Districts and Tribes. The Wildlands Conservancy staff may support this project by providing biological and site-specific knowledge as Responsible Party designees.

Applicant Information

- Name: **Eastern Sierra Council of Governments**
- Mailing Address **PO Box 1609, Mammoth Lakes, CA 93546**
- Phone Number **760-878-8444**
- Email Address **Kristen.pfeiler@inyocounty.us**
- Organization
 - ✓ **Public Agency**
 - RCD
 - NGO
 - Tribe
 - FSC
 - Utility
 - Professional Land Manager
 - Other
- Different Primary Contact (Yes/No)
 - If yes, provide same information above for primary contact

Qualified Party Responsible for Project Operations* (Identify the qualified party responsible for project operations. All project work must be performed or supervised by one or more certified or licensed responsible parties, such as Registered Professional Foresters, Certified Rangeland Managers, qualified vegetation management contractors, qualified incident commanders, certified arborists, certified burn bosses and/or authorized cultural burners. If the qualified party is not known at this time or the applicant needs to add/change the identified qualified parties, they are to notify CalEPA, CNRA, and the applicable CAL FIRE Unit prior to commencement of approved operations.)

- Qualified Responsible Party Known (Yes/No; if yes, provide the following)
 - Name **Anna Baglione**
 - Phone Number **760-851-5121**
 - Email Address **anna.1.baglione@sce.com**
 - Mailing Address **374 Lagoon St., Bishop, CA 93514**
 - Operator Type **ISA Certified Arborist**

- License Number **WE-12904A**
- Responsibility/Role
- Is a burn boss or cultural burner involved? (Yes/**No**; if yes see below)
 - Acting as Burn Boss or Cultural Burner? (Yes/**No**; if yes select qualification)
 - Qualification
 - CARX
 - Cultural Burner
 - NWCG Type 1
 - NWCG Type 11

* You can add as many responsible parties as you want

Conduct cultural resources outreach and records search; conduct biological surveys and pre-activity clearance inspections. Responsible Party will coordinate with qualified CAL FIRE and other partner agency burn bosses/ICs as designees for pile and curtain burning activities. Responsible Party will also coordinate with other qualified resource and vegetation management professionals within CAL FIRE and other working group partner agencies as designees for clearance inspections.

Jurisdictional Information

- Location (Please drop a point on the map for the estimated location of the Suspension Request)
- Multi-Jurisdiction Disclaimer (By default, the Responsibility Area and CAL FIRE Unit are automatically calculated from the point that you identify in the "Location" question. If your project area spans multiple Responsibility Areas and/or multiple CAL FIRE Units, please select all appropriate jurisdictions)
- Responsibility Area
 - Local
 - ✓ **State**
 - Federal
- CAL FIRE Unit (lists all Units, select all applicable) **San Bernardino-Inyo-Mono**

Commercial Component: Project Revenue

(Projects may include a commercial component provided the project's primary objective is aligned with the suspension eligibility requirements for fast-tracked fuels reduction work. Commercial components of projects must be conducted pursuant to the Forest Practice Act and Rules under an appropriate harvest document approved by the Department of Forestry and Fire Protection (i.e. Timber Harvest Plan, Non-industrial Timber Management Plan, Notice of Exemption or Notice of Emergency) to ensure that resulting wood or biomass residue can be accepted at appropriate wood processing facilities.) N/A

- Commercial Harvest (Please indicate if the project is expected to generate revenue (this includes the sale, barter, trade, or exchange of any wood product.) (Yes/No; if yes, explain)

- Explain (Please explain the commercial aspects of the project and which treatments this applies to if multiple treatments are being deployed in the project operational boundary)

Treatments

Treatment Advisory: While total footprint acres (geographic area that receives one or more treatments) may not exceed 3,000 acres, activity acres that occur in sequence on a given acre over time may cumulatively exceed 3,000 acres. For example, repeat mechanical treatments may occur on a given acre during the Suspension approval period. Or a blend of treatments, such as a mix of manual, mechanical, and broadcast burning may occur on a given acre.

- Select all applicable treatment activities; for each selected treatment type, you will be asked to provide the number of acres. For “other”, you will also be asked for name the treatment.
 - ✓ Mechanical (potential for chipping)
 - ✓ Manual
 - Prescribed Herbivory
 - ✓ Herbicide
 - ✓ Pile Burning
 - Broadcast Burning
 - Cultural burning
 - Other
 - ✓ For each selected treatment type, you will be asked to provide the number of acres. For “other”, you will also be asked for name the treatment. (Curtain burning)
- **Description of Work** (Please describe overall project scope including key objectives and long-term vision. The description should be consistent with the primary stated objectives of the project, the treatment types itemized above and include applicable information as to any relevant CAL FIRE Unit Fire Plans, Community Wildfire Preparedness Plans, and Utility Wildfire Mitigation Plans (WMPs) that meet the objectives above (as applicable). Electrical corporation applicants should include the WMP cycle (2023-2025 or 2026-2028), the WMP year in which the work is projected to occur, the Initiative or Mitigation Activity Tracking ID or, if no tracking ID, the WMP page number where the activity is described. Failure to answer with appropriate detail asked for will result in an incompleteness determination. Further, answers such as "not applicable" or "see attached" will not be accepted (attachments are not accepted). (1200 characters)

Riparian areas are a primary carrier of wildfire in Inyo and Mono County and have historically been excluded from fuel reduction efforts due to their environmental sensitivity and regulatory hurdles. As a critical need identified in the 2025 BDU Fire Plan and Inyo County CWPP, this project’s objective is to reduce wildfire risk to Bishop, Starlite, Bishop Creek, Round Valley, Rovana, Mustang Mesa, Millpond by treating riparian corridors that transect Southern California Edison electrical lines near communities. Treatments will include manual vegetation removal

and herbicide application if necessary. Riparian treatments will retain riparian function consistent with the EPP and occur within 100 ft. of habitat or existing roads/crossings to minimize impacts of undisturbed habitat. Adjacent upland areas will also be treated to increase effectiveness. Work will occur in dry channels and immediately adjacent to wetted channels, but no material will be removed from the wetted channel. Large downed material will be retained where feasible but may be redistributed across the site to reduce fuel densities; woody debris will be retained in creeks and on banks to maintain aquatic habitat.

- **Fuels Management** (Please describe the strategy for modifying the horizontal and vertical continuity of hazardous fuels including any elements of commercial harvest. Describe post-harvest and understory canopy to remain. Failure to answer with appropriate detail asked for will result in an incompleteness determination. Further, answers such as "not applicable" or "see attached" will not be accepted (attachments are not accepted). (600 characters)

Fuels will be modified via prioritized removal of non-native/invasive ladder fuels, dead/downed material, and dead/dying/diseased/otherwise hazardous trees of all sizes. Removal of non-listed native understory species, upland species, and live native trees <12" DBH may occur to meet below spacing objectives. Selective removal of hazard trees posing imminent threat to powerlines or critical infrastructure may occur. Retained trees will be limbed 6 ft. except where emergency vehicle access requires additional clearance. Average percent cover of native riparian species required by EPP 3.f. will be maintained and an average of 25% of upland vegetation will be left in a mosaic spacing of 2x shrub height.

- **Ground Based Equipment** (Please describe the ground-based equipment to be used for vegetation management and for the treatment of slash and surface fuels.) (600 characters)

Ground-based equipment will include chippers, curtain burners, and hauling trucks/trailers, for treatment of manually cut material, as well as vehicles and fire apparatus to support crews and burning operations. Ground-based equipment will remain on existing disturbed or improved surfaces such as roads, parking areas, turnouts, and driveways to the extent feasible and will not enter the standard widths of any watercourses, as defined in the EPP, except at existing crossings or disturbed areas such as those listed above. The project does not include new roads or watercourse crossings. (not under 600 characters)

- **Woody Debris (or Slash) Management** (Please describe the timing and methods for woody debris or slash treatment once treatment has been performed. Such description should include detail on debris or slash depth and distribution on project site.) (600 characters)

Depending on site-specific conditions and implementation timing, cut material will be lopped and scattered, chipped, burned via pile or curtain burning, or hauled away. Cut material, burn piles, and/or chips will not be placed where they will enter or otherwise impact watercourses. Chips or other spread material will not exceed an average of 2" in depth with a maximum of 4". Some riparian areas lack defined associated channels (see

“other watercourses”) but will be treated as within 100 ft. of a perennial watercourse. All treatment will occur in compliance with the Lahontan Timber Waiver.

- **Maintenance Plan** (Please describe the long-term maintenance/retreatment plan for all treated areas. Though long-term maintenance is not covered by the suspension request, Agencies request this information to understand applicant's long-term vision.) (600 characters)

A traditional CEQA document will be completed for maintenance activities and will consider the treated condition as the baseline. SCE and partners will continue maintenance treatments on the property. Future complimentary treatment options on adjacent private parcels in communities and surrounding federal, state, and private land will be explored.

Project Map

- Provide an overview map of the project representing the entire operation area including any pertinent access information and the travel route from the nearest community or well-known landmark.
- Provide a detailed topographic USGS 7.5-minute quadrangle map(s) or its equivalent at a scale that reasonably depicts operational detail. Additional maps may be required at a larger scale to adequately display the project area, natural features and map points. Additional maps may be required to show details of areas in focus, if needed, to provide relevant detail
 - Accepted File Formats: .pdf, .png, .tiff
 - Maximum Number of Files: 5
 - Maximum file size 10 MB (may include multiple PDF pages within file limit)
- The following information IS REQUIRED on maps, as applicable. Note, information required below should appear together on the same map(s) to provide context of treatment boundaries and activities as they relate to resources and infrastructure of interest.
 1. Boundaries of the Fuel Reduction Operations (operational area includes but is not limited to existing access roads and landings adjacent to treatment area).
 2. Boundaries of each individual fuel treatment, within which unique treatment activities are clearly distinguishable (e.g., show locations of distinct activities such as broadcast burn, mastication, thinning, etc.) including where different treatment activities overlap.
 3. Location of all roads to be used for, or potentially impacted by, fuel reduction operations. Identify if the road is permanent, seasonal, or temporary (skid trail). Simply displaying aerial image of road is insufficient.

4. Label the Public Land Survey System (meridian, township, range, and section).
5. Location of all watercourses and their designation:
 1. Perennial stream is a stream that flows continuously throughout the year. This means it maintains a continuous water flow, not just during wet periods or after precipitation events.
 2. Intermittent stream is a channel that carries flowing water only during certain times of the year, specifically when groundwater or runoff from precipitation provides enough water to maintain flow. During dry periods, these streams may not have any flowing surface water.
 3. Ephemeral stream is a channel that only flows during and for a short duration after precipitation events, typically when the ground is saturated. These streams are above the water table year-round and lack a defined channel or riparian vegetation. They are primarily fed by surface runoff from rainfall.
6. Location of any springs and vernal pools.
7. Location of water drafting sites.
8. Location of any temporary watercourse crossings.
9. Location of watercourse protection areas when operations (temporary crossings, fuel breaks, equipment staging sites, or riparian habitat treatments) may intersect these areas. Perennial streams receive a width of 100 feet and intermittent streams 50 feet.
10. Location of known slides or unstable areas.
11. Location of Coastal Zone Boundary.
12. A legend indicating the meaning of map symbols used. Include separate symbologies for each individual fuel treatment activity or combined fuel treatment activities. If maps cover multiple pages, ensure each legend is tailored to that map's relevant symbols displayed (e.g., if a mastication activity is present on one map page, and not on another map page, the former should depict mastication in legend, while the latter should not depict mastication in legend).
13. When using color, avoid similar hues for the same feature. Contrast with light or dark tones or symbology with different shape, texture or pattern is preferred. Ensure color ramps and legend items are clearly legible and distinguishable and that colors used are color blind friendly (no red-green color ramps for example). Map symbology must be able to be read in black and white as well as color.

Burning Considerations

A Smoke Management Plan will be completed and approved by Great Basin Unified Air Pollution Control District prior to any burning operations and will identify appropriate weather conditions for burning such as temp, wind speed and direction, mixing height, etc. Qualified CAL FIRE or other partner agency implementors will conduct all burning operations. Piles will be ringed with handline and hose, and material from adjacent piles may be fed into an appropriately prepared pile. The area around curtain burners will similarly be cleared. Existing roads and wet areas will serve as breaks.

Standard public notification will occur via social media and physical signage. Local law enforcement and cooperators will be notified prior to activities. All burns will be approved by GBUAPD and will be visible on PFIRS, Watch Duty, CAL FIRE Incidents webpage, and other similar applications. GBUAPD preferred means of receiving smoke complaints can be shared in all outreach, if desired.