



2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 **phone**
916.564.4501 **fax**

esassoc.com

memorandum

date July 14, 2026

to Jennifer Krafcheck, ESCSD

cc Chelsea Cluff, Lumos & Associates

from Dave Beauchamp, Todd Gordon, and Rudy Reyes, ESA

subject Notice of Exemption for the Eastern Sierra Community Service District CY2022 Disaster Water Grants Program

Introduction

This document describes the Eastern Sierra Community Service District (ESCSD) CY2022 Disaster Water Grants Program (proposed project) and evaluates its eligibility for a Categorical Exemption (CatEx) under the California Environmental Quality Act (CEQA), as outlined in CEQA Guidelines Article 19, *Categorical Exemptions*. The proposed project includes maintenance and improvements to the ESCSD managed sewer service collection system (collection system).

Project Description

The following provides a description of the proposed project's objective and background, location, and components as well as associated construction, operations, and maintenance activities.

Project Background

ESCSD is a special district that provides wastewater services to areas surrounding the City of Bishop in Inyo County, California (see **Figure 1**). ESCSD is tasked by property owners and ratepayers within its service area to operate and maintain critical infrastructure and services (ESCSD 2025). The ESCSD service area includes several non-contiguous areas within the City of Bishop's sphere of influence including communities to the northwest and southwest; additionally, ESCSD manages wastewater flows from the Bishop Paiute Indian Community (Bartle Wells Associates 2023). ESCSD also operates a wastewater treatment plant (WWTP) and a treated effluent discharge area.

The ESCSD service area and the surrounding region experienced severe storms with prolonged snowfall and rainfall from November 2022 through January 2023. On January 14, 2023, a Presidentially Declared Flood Disaster was issued in California (DR-4683-CA) for severe winter storms, flooding, landslides, and mudslides. This intense weather raised groundwater levels in the ESCSD service area resulting in groundwater entering into the collection system. Although some sewer mains at creek crossings are

encased in concrete, much of the system consists of older clay pipes that experienced excessive infiltration. Additionally, the resulting high groundwater levels led to significant infiltration into the sewer main pipelines and inflow through manholes. The increased flow overwhelmed the local collection system and conveyed excessive stormwater combined with wastewater to the WWTP, exceeding its designed treatment capacity.

A draft Preliminary Engineering Report (PER) was prepared by Lumos & Associates in August 2024, and an updated PER was prepared in November 2024 (Lumos & Associates 2024) which includes additional information regarding the proposed project referenced herein. The PER was utilized in preparation of a National Environmental Quality Act (NEPA) Categorical Exclusion prepared by the U.S. Department of Agriculture Rural Development in October of 2024. The proposed project was determined to be a NEPA Categorical Exclusion in accordance with 7 CFR Part 1970. It was determined that there would be no adverse environmental impact caused by the proposed project and therefore no mitigation was required.

Project Location

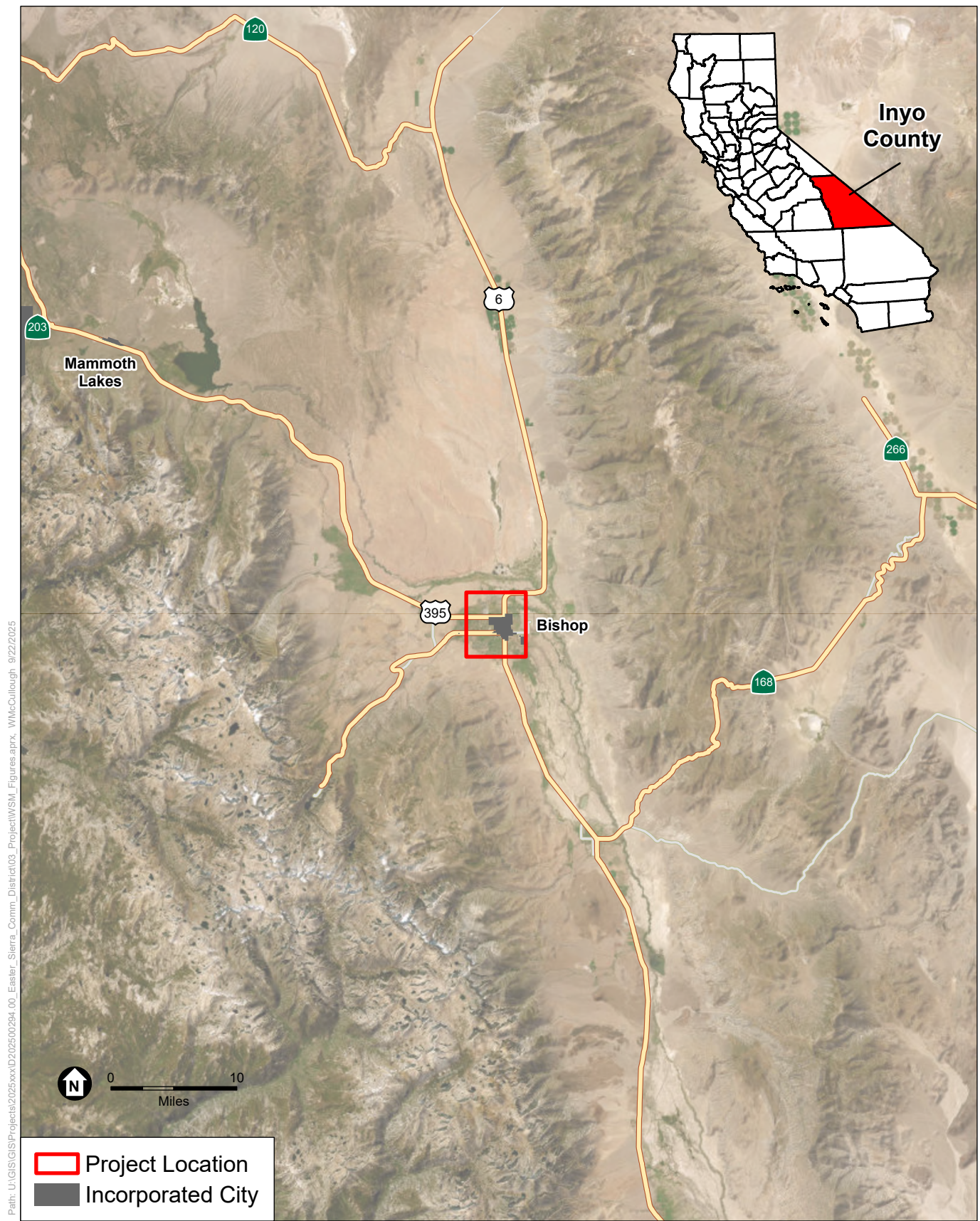
The proposed project would involve construction activities in the City of Bishop and unincorporated Inyo County along five segments of the ESCSD collection system (established project alignments), located within, and in proximity to, the ESCSD service area as shown in **Figure 2**.

Specifically, the proposed flexible liner installations would include the following segments of the ESCSD collection system:

- two segments adjacent to United States (U.S.) Route 395 and U.S. Route 6, which extend to the northwest and connect to sewer main pipelines along Dixon Road and serve several nearby mobile home communities to the west;
- one segment near the intersection of Spruce Street and East Yaney Street, on a parcel adjacent to the Shady Rest Trailer Park to the southeast;
- one segment approximately 500 feet south of State Route (S.R.) 168, extending from South Barlow Lane; and
- one branched segment that extends from South Barlow Lane and Schober Lane before merging and continuing eastward to the ESCSD WWTP, crossing both U.S. Route 395 and S.R. 168.

Project Objectives

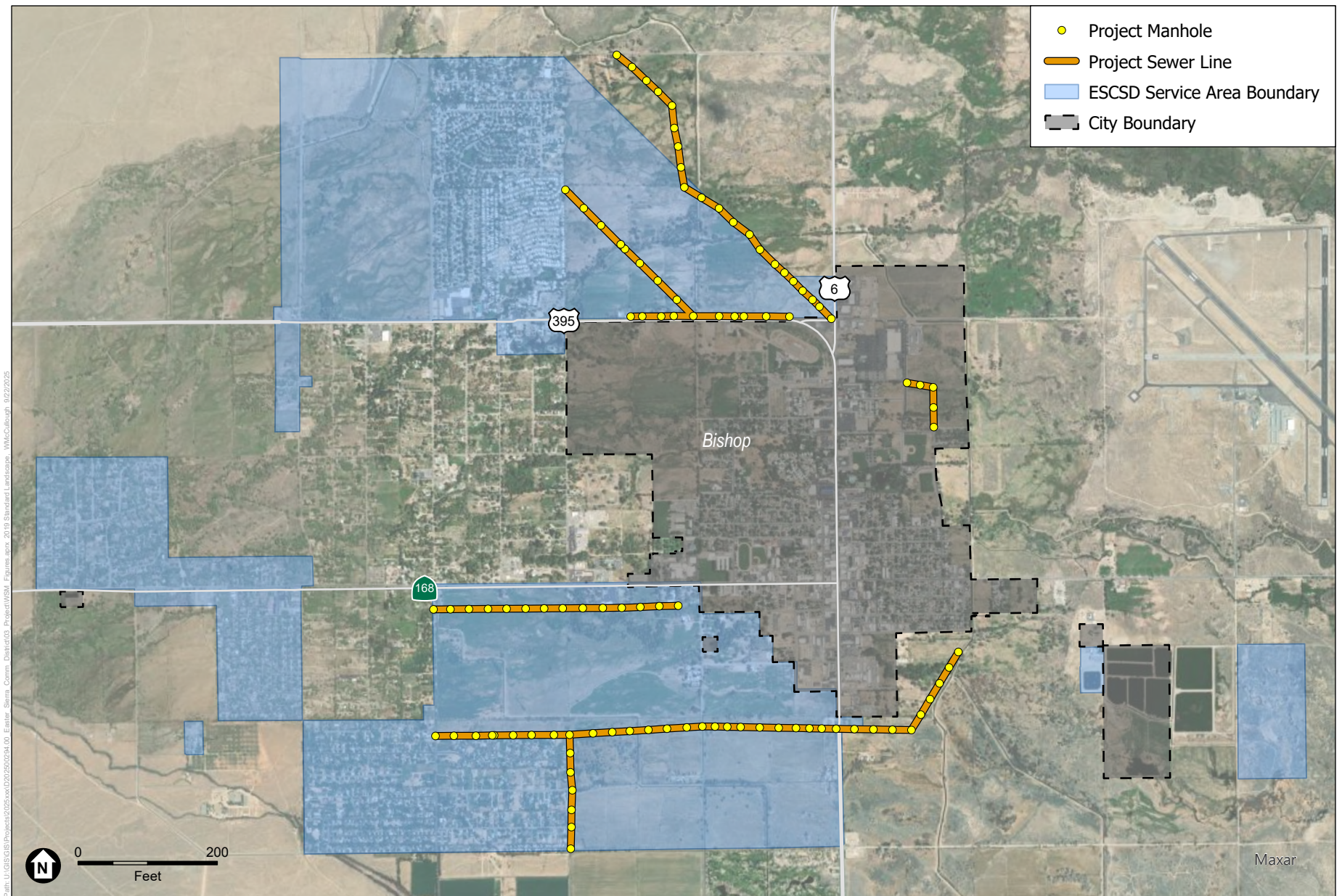
The objective of the proposed project is to restore the integrity of the ESCSD collection system. The proposed project would enhance the performance, reliability, and resilience of the collection system through the rehabilitation and installation of key infrastructure components by reducing inflow and infiltration into the sewer system through cracks and leaks. These improvements are necessary to return the wastewater treatment process to regulatory compliance, safeguard public health, and ensure the long-term functionality of ESCSD's infrastructure amid severe weather events.



SOURCE: ESA, 2025

Eastern Sierra Community Service District Collection System Improvement Project

Figure 1
Regional Location



SOURCE: ESA, 2025

Eastern Sierra Community Service District Collection System Improvement Project

Figure 2
ESCSD Service Area and Project Components

Project Description

The proposed project would include the following components:

- rehabilitation of approximately 32,411 feet of existing sewer main pipeline using a new flexible cured-in-place pipe (CIPP) lining to significantly reduce groundwater infiltration and extend the life of the aging infrastructure (see **Table 1**);
- installation of new seals using spray or epoxy coating cured by an air-dry system for 94 manholes to prevent stormwater inflow and further protect the system during future flood events, steam or ultraviolet light may be used as alternative curing methods on an as-needed basis, but use of these methods is generally not anticipated;
- and development of temporary groundwater dewatering wells as needed in areas where high groundwater table exists and could impede construction activities.

TABLE 1
PROPOSED SEWER MAIN PIPELINE LINER INSTALLATIONS

Diameter of Pipeline (inch)	Length of Liner Installed (linear feet)
8	860
10	7,174
12	9,149
14	3,029
16	6,754
20	4,118
24	1,327
Total	32,411

SOURCE: Lumos and Associates, 2024

Project Construction

Construction activities for the proposed project would involve work along several existing segments of the ESCSD collection system using a CIPP lining method to repair the collection system. CIPP lining is a trenchless rehabilitation method used to repair damaged or aging pipelines. The process involves inserting a resin-saturated liner into the existing pipe, which is then cured to harden and form a new pipe within the original one. This technique minimizes disruption to the ground compared to the conventional trenching technique to rehabilitate pipes. CIPP restores structural integrity, extends the lifespan of the pipe, and prevents future leaks (see **Figure 3**).

Temporary construction staging areas would be established to store equipment and materials located adjacent to established project alignments within previously disturbed areas to avoid effects on environmental resources. Additional staging areas if needed would be coordinated with landowners and temporary easements or agreements would be obtained prior to construction. Construction is anticipated to require approximately 10 workers for any given segment of the alignment, and these workers would

generally be sourced from the labor pool in the surrounding area. However, if multiple segments of the alignment are improved sequentially, additional crews would be used. Construction would utilize standard construction equipment, depending on the method selected this could include air compressors, steam or water boilers, inversion drums, generators, scaffolding, and utility trucks including a closed-circuit television camera truck and a box truck. Construction activities would occur Monday through Friday within standard working hours (7 a.m. to 7 p.m.), no nighttime work is expected to occur.

Construction-related hauling and equipment transport would occur along various local roadways within and adjacent to the ESCSD service area. Primary access to the established project alignments would be provided via U.S. Route 395, U.S. Route 6, and S.R. 168. These regional highways would serve as the main haul routes for delivering construction materials, equipment, and removing any waste or debris from the established project alignments. Local roads would be used to access specific work and staging areas.

Minimal waste is expected from construction activities; pipes would be flushed with water prior to CIPP lining that would be sent to the nearby ESCSD wastewater treatment plant, other waste would include packaging and debris from construction-related materials and excess CIPP lining.

Project Schedule

The proposed project is expected to start in late 2026, and construction is expected to be completed in early 2027. Construction activities would take approximately 16 weeks; however, construction timing and phasing would be subject to change based on flood irrigation which occurs on portions of the established project alignments.

Project Operations and Maintenance

Following the completion of construction, the ESCSD collection system and WWTP would continue to operate under existing conditions. There would be a decrease in overall wastewater flow to the WWTP due to reductions in dilution from inflow and infiltration; however, there would be no changes to the overall type or volume of undiluted wastewater generated within the ESCSD service area. Routine operations and maintenance activities, such as system inspections, flow monitoring, pump servicing, pipeline cleaning, and minor maintenance would be carried out by ESCSD personnel in accordance with existing protocols to ensure continued regulatory compliance and system performance. No new staff would be required following completion of the proposed project.

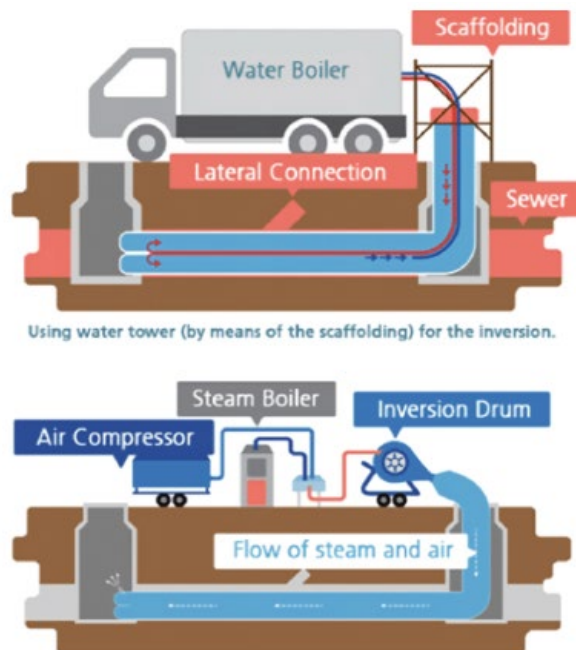


Figure 3
Possible Methods for CIPP Collection System Liner Installation

Best Management Practices, Standard Operating Procedures and Avoidance and Protection Measures

The following standard Best Management Practices (BMPs), Standard Operating Procedures, and Avoidance and Protection Measures shall be incorporated into the construction contract for the proposed project to minimize potential releases of soils or sediments, hazardous materials spills, minimize air quality emissions, minimize noise conflicts, and avoid impacts on biological resources:

Best Management Practices

Water Quality and Hazardous Materials

- All equipment and vehicles must be checked daily for the prevention of material leaks. Staging/storage areas for equipment, materials, fuels, and lubricants shall be located as far away as possible from open water. A spill kit must be present on site in the event of fuel leaks or spills.
- All fueling of equipment must be done more than 50 feet away from open water.
- To reduce the potential for loose sediment to runoff into nearby waterways, construction activities shall be carried out consistent with the Erosion and Sediment Control Plan prepared for the proposed project which would include the use of straw waddles or other sediment control measures must be used to prevent sediment runoff.
- If dewatering activities for inundated areas are required, effluent must be either discharged directly into the ESCSD collection system for proper treatment at the WWTP, in accordance with applicable regulations, or discharged to land, consistent with the conditions outlined in a Low-Threat Discharge to Land permit obtained from the Lahontan Regional Water Quality Control Board (see *Project Permits* below).
- All areas must be cleaned of any trash and debris and returned, as close as possible, to the condition prior to initiation of construction activities.

Standard Operating Procedures

Air Quality

- To minimize air quality impacts, all equipment must be shut off when not in use. If idling is necessary for running equipment, operations shall be planned to limit idling time as much as practicable.
- Limit equipment to 15 miles per hour (mph) on site to reduce dust produced by equipment.
- Construction noticing regarding temporary noise and odor shall be sent to nearby residences adjacent to areas where construction activities would occur.

Avoidance and Protection Measures

Biological Resources

- If construction activities are scheduled to occur during the avian nesting season (February 1 through September 1), a qualified biologist shall conduct the following pre-activity survey to avoid potential adverse effects to special-status nesting birds.

- No more than three days prior to the start of construction, a qualified biologist shall perform pre-activity surveys for nesting birds within 500 feet of the work area. If pre-activity surveys indicate that nests are inactive or potential habitat is unoccupied during the construction work period, no further surveys or avoidance are required. If construction does not begin within three days of the preconstruction survey, or if it halts for more than three days, an additional preconstruction survey shall be conducted.
- If active nests are detected during pre-activity surveys, construction activities would not occur until a qualified biologist determines that fledglings have left an active nest.
- In the event of any encounter with any terrestrial wildlife species while traversing the established project alignments, crews must halt their activities and wait for the species to leave the area of its own volition. If the species is not able to leave on its own, then a qualified biologist shall be contacted to aid in the removal of the species from the area.

Project Permits

The proposed project would involve activity in previously disturbed areas within roadways and fields used for cattle grazing. Construction activities would occur within existing utility corridors on lands owned by the Los Angeles Department of Water and Power (LADWP) held under easements by ESCSD; however, additional lands adjacent to the alignment would need to be accessed. Therefore, a letter of permission for construction activities shall be obtained from LADWP prior to construction activities. This would ensure compliance with LADWP requirements, protection of existing infrastructure, and allow for coordination with LADWP, and ranchers which lease the land from LADWP, for any necessary access or construction activities.

Some work would occur within and adjacent to U.S. Route 6 which is the responsibility of the California Department of Transportation (Caltrans), as well as local roadways in Inyo County and the City of Bishop. Therefore, an encroachment permit shall be obtained from Caltrans and traffic management plans shall be submitted to the City of Bishop or Inyo County for approval for any work completed that would occur within a roadway or an associated right-of-way.

Additionally, groundwater dewatering wells may be required in areas where groundwater is close to surface, in some instances dewatering effluent would be released into the collection system and processed at the WWTP. However, due to limited capacity at the WWTP, a Low-Threat Discharge to Land permit shall be obtained from the Lahontan Regional Water Quality Control Board (Region 6) to release some dewatering effluent directly onto adjacent agricultural fields which are already subject to regular flood irrigation.

Table 2 below presents a list of the agency permits or approvals that would potentially apply to the proposed project.

**TABLE 2
PROJECT PERMITS AND APPROVALS POTENTIALLY REQUIRED**

Agency	Permit or Approval
Los Angeles Department of Water and Power (LADWP)	Letter or Permission

Agency	Permit or Approval
California Department of Transportation (Caltrans)	Encroachment Permit
Regional Water Quality Control Board, Lahontan Region 6	Low-Threat Discharge to Land Permit
County of Inyo	Traffic Management Control Plan Approval
City of Bishop	Traffic Management Control Plan Approval
SOURCE: Data Compiled by ESA 2026.	

Applicability of a Categorical Exemption

Sections 21080 and 21084 of the California Public Resources Code exempt certain projects from the requirements of CEQA. Specifically, under Section 21084 which directs the inclusion of a list within the CEQA Guidelines identifying project types that typically do not have significant environmental effects and are therefore categorically exempt. These exemptions are outlined in Article 19, Sections 15300 to 15332 of the CEQA Guidelines. As described below, the proposed project meets the criteria for a Class 1(b) Categorical Exemption under Section 15301, *Existing Facilities*.

Justification for a Categorical Exemption

CEQA Guidelines, Article 19, Section 15301 identifies Class 1 projects as consisting of the:

“...the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use...”

Specifically, the proposed project meets the criteria for Class 1(b) which is described as the following: “existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services.”

As discussed in *Project Description*, the proposed project would implement maintenance and minor improvements to the existing ESCSD collection system to restore system integrity, reduce stormwater inflow and groundwater infiltration, and improve resilience to future storm events. The improvements include trenchless rehabilitation of approximately 32,411 feet of existing sewer main and applying new seals to 94 existing manholes. All improvements would occur within existing facilities along existing utility corridors and previously disturbed agricultural lands adjacent to the alignment. The proposed project would not alter or expand the existing collection system. Instead, it would ensure the continued reliable operation of ESCSD infrastructure within its originally designed capacity.

The proposed project would prevent further deterioration of the aging collection system and treatment infrastructure and support compliance with regulatory discharge requirements. As discussed, in the *Exceptions to Categorical Exemption Classes* section below, the proposed project does not qualify as an “exception” to the classes of Categorical Exemptions. The proposed project meets the criteria for a Class 1(b) Categorical Exemption under CEQA Guidelines Section 15301, because it involves the repair, maintenance, and minor alteration of existing publicly owned utility facilities with no or negligible expansion of use.

Exceptions to Categorical Exemption Classes

CEQA Guidelines Section 15300.2 lists project types for which Categorical Exemptions may not apply. The following section discusses why the proposed project is not subject to any of the exceptions. Each exception is shown in *italics* and is preceded by relevant analysis.

- a. ***Location.*** *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
 - The categorical exemption that applies to the proposed project is classified as Class 1 in the CEQA Guidelines. Therefore, exception (a), above, which only applies to Classes 3, 4, 5, 6, and 11, does not apply to the proposed project.
- b. ***Cumulative Impact.*** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
 - The cumulative context is the ESCSD collection system located west of the City of Bishop in Inyo County, and the surrounding areas within both of these jurisdictions.

There are two ongoing, planned, or recently completed projects in the cumulative area, this includes a recently completed project by the Bishop Paiute Indian Tribe for a similar CIPP liner installation project and a planned CIPP liner installation project within the City of Bishop that is expected to be completed within the next five years, per information provided by ESCSD.

The proposed project consists of short-term, maintenance-related activities focused on minor improvements to the existing ESCSD collection system. These activities are limited in both scope and duration and include installation of CIPP lining for 32,411 feet of sewer line and 94 new seals for manholes. Importantly, the proposed project does not involve the construction of new facilities, expansion of the collection system, or increases in service capacity. All work would occur within the boundaries of existing ESCSD easements such as existing rights-of-way and access corridors, as well as along adjacent agricultural lands accessed under a letter of permission granted by LADWP for construction activities. As a result, the physical footprint of the proposed project would be minimal and confined to areas that have already been impacted by prior development or ongoing uses.

Given the limited scale and purpose of the work, the proposed project is not expected to result in cumulatively considerable impacts when evaluated alongside other past, present, or reasonably foreseeable projects in the area. The absence of growth-inducing features, such as capacity increases or system extensions, means the proposed project would not contribute to regional population growth or urban expansion. Furthermore, temporary construction activities shall be subject to BMPs, Standard Operating Procedures, and Avoidance and Protection Measures to reduce potential impacts and other short-term disturbances. When viewed in the context of ongoing infrastructure maintenance and improvement efforts within the ESCSD and surrounding jurisdictions, the proposed project would allow for the

continuation of essential public service operations, rather than a new or expanded source of environmental impact. Therefore, the proposed project would not contribute significantly to any cumulative environmental effects identified in the region.

- c. ***Significant Effect.*** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances.*

- Under CEQA Guidelines Section 15300.2(c), a categorical exemption may not be used when there is a reasonable possibility that the project would have a significant environmental effect due to unusual circumstances. Unusual circumstances are not defined in the CEQA Guidelines, and court decisions have interpreted unusual circumstances as the [significant] effect must be “due to unusual circumstances.”¹

The proposed project consists of maintenance and minor improvements to the existing ESCSD collection system. All work would occur within the boundaries of existing ESCSD easements such as existing rights-of-way and access corridors, as well as along adjacent agricultural lands accessed under a letter of permission granted by LADWP prior to construction activities. The activities associated with the proposed project are typical of utility infrastructure maintenance projects and do not involve significant ground disturbance, expansion of facilities, or new use of the land.

There are no unusual physical, environmental, or operational characteristics associated with the proposed project or its location that would create a reasonable possibility of a significant environmental effect. The ESCSD service area is rural, and the proposed project would occur within rights-of-way previously developed for public infrastructure use, as well as along adjacent agricultural lands accessed under a letter of permission granted by LADWP for construction activities. Furthermore, the *Environmental Evaluation* below demonstrates that the proposed project would not result in any significant impacts to the resource topics outlined in CEQA Guidelines Appendix G.

Because the proposed project does not present unusual circumstances and there is no evidence of a reasonable possibility of significant environmental effects, the exception under CEQA Guidelines Section 15300.2(c) does not apply.

- d. ***Scenic Highways.*** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

- The *Aesthetics* subsection below describes the existing environmental conditions near the established project alignments related to aesthetic resources. The established project alignments are not located within the viewshed of a designated state scenic highway. The nearest designated scenic highway, S.R. 168, is approximately 2,600 feet west of the closest portion of the established project alignments. While construction activities may be visible

¹ Katerina Deaver. 2015. Supreme Court Clarifies the “Unusual Circumstances” Exception under CEQA. Published March 3, 2015. <https://www.mitchellchadwick.com/2015/03/supreme-court-clarifies-the-unusual-circumstances-exception-under-ceqa/>.

from two eligible state scenic highways, U.S. Route 395 and another segment of S.R. 168, these routes have not been officially designated as scenic under the California Scenic Highway Program (Caltrans 2019).

The proposed project involves only minor improvements and maintenance activities to existing underground collection system infrastructure. All work would take place within previously disturbed areas and would not result in tree removal, modification of prominent landforms, or visual impacts to scenic resources. The proposed project does not include the construction of any new above-ground structures that would be visible from scenic highways or impact scenic vistas once construction is complete. Therefore, the proposed project would not damage scenic resources within a designated state scenic highway corridor, and the exception under CEQA Guidelines Section 15300.2(d) does not apply.

*e. **Hazardous Waste Sites.** A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

- The *Hazards and Hazardous Materials* subsection below describes the existing environmental conditions near the established project alignments related to hazards. The established project alignments are not listed on any database compiled pursuant to Government Code Section 65962.5 (commonly known as the Cortese List). However, three sites are within 0.25 miles of portions of the established project alignments and remain designated as “open.” These include two Leaking Underground Storage Tank (LUST) Cleanup Sites, identified in the State Water Resources Control Board’s GeoTracker database (SWRCB 2025), and one Voluntary Cleanup Site listed in the Department of Toxic Substances Control’s EnviroStor database (DTSC 2025).

Each of these sites are discussed in further detail below:

- Bishop Veterinary Hospital (T10000020952): This site is approximately 150 feet south of the closest portion of the established project alignment and is separated by U.S. Route 395. The site contains possible contaminants including benzene, ethylbenzene, gasoline, naphthalene, toluene, total petroleum hydrocarbons (TPH [e.x. gasoline, diesel, motor oil]). The site is currently designated as open and is under a site assessment as of April 4, 2023. A Phase I Assessment Report was completed for the site by LADWP and was received by the SWRCB on March 30, 2023; a supplemental Phase II Assessment Report was received on June 4, 2025. No further regulatory actions have taken place as of June 4, 2025, and the site is still in need of remediation (SWRCB 2025).
- LLO Gas (T10000000626): This site is approximately 425 feet south of the closest portion of the established project alignment and is separated by U.S. Route 395. The site contains possible contaminants including gasoline and diesel. The site is currently designated as open and is under a site assessment as of April 14, 2020. A Remedial Action Plan was developed by LADWP on May 3, 2023, and a letter of concurrence was issued by the SWRCB on May 5, 2023. On April 16, 2025, LADWP sent a Remedial Action Completion Report and Soil Vapor Sampling Report alerting the SWRCB that remedial activities at the site have been completed and the site is ready for evaluation and closure (SWRCB 2025).

- Eastern Sierra Tri-County Fair (1407001): This site is approximately 300 feet south of the closest portion of the established project alignment and is separated by U.S. Route 395. The site contains possible contaminants including TPH (gasoline), benzene, toluene, ethylbenzene and xylenes. The site is currently designated as open and is under a standard voluntary cleanup agreement with the Lahontan Regional Water Quality Control Board (RWQCB). The voluntary agreement was issued July 18, 1995, and a Voluntary Cleanup Agreement Completion notice was received by the Lahontan RWQCB on June 30, 1997. While remedial activities have been reported to be completed the site remains open; the last update for this site was on June 30, 1997 (DTSC 2025).

Although three hazardous materials sites within 0.25 miles of the established project alignments remain designated as “open,” they are not located directly within the proposed project footprint and are not expected to pose a risk to construction activities or future operation of the ESCSD facilities. The proposed project involves only maintenance and minor improvements within previously disturbed areas, with no ground disturbance in the immediate vicinity of the listed sites. As such, there is no reasonable potential for exposure to contaminants, and these nearby listings do not present a significant environmental concern for the proposed project.

*f. **Historical Resources.** A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

- The *Cultural, Tribal Cultural, and Paleontological Resources* subsection below describes the existing environmental conditions near the established project alignments related to cultural, tribal cultural, and paleontological resources.

As described in the *Project Description*, the proposed project would take place within areas that were previously disturbed during the original installation of the ESCSD collection system or in agricultural lands accessed under a letter of permission obtained by LADWP prior to construction. While there is the potential for undiscovered historical resources to be present, the surrounding vicinity is generally already developed with urban infrastructure or actively used for cattle grazing. Therefore, any resources present would likely have been discovered or destroyed during the initial installation of the collection system and surrounding development and through subsequent use.

Because the proposed project would only involve minor ground disturbance and all work would occur within existing facility footprints and previously disturbed utility corridors, it would not result in impacts to historical resources. Since no new areas would be affected, there is low potential for the proposed project to cause a substantial adverse change in the significance of a historical resource.

Although impacts on cultural, tribal cultural, or paleontological resources are not anticipated, the proposed project would comply with all applicable laws and procedures in the event of an inadvertent discovery at surface level. In accordance with CEQA Guidelines Section 15064.5 and Public Resources Code Sections 5097.94 and 5097.98, appropriate notifications and consultations shall be initiated, including with affiliated Native American tribes if tribal cultural resources are involved. Therefore, the exception under CEQA Guidelines Section 15300.2(f) does not apply.

Based on the discussion above, the proposed project does not qualify as an “exception” under CEQA Guidelines Section 15300.2, it is recommended that a Notice of Exemption for the proposed project be prepared and filed with the California Office of Land Use and Climate Innovation, State Clearinghouse.

The proposed project meets the criteria for a Class 1(b) categorical exemption as listed in CEQA Guidelines Sections 15301. Section 5, *Environmental Evaluation*, addresses resource topics consistent with CEQA Guidelines Appendix G and provides additional support that there is no reasonable likelihood the proposed project would result in any significant environmental impacts.

Environmental Evaluation

Environmental Factors of Concern

Due to the type and location of the proposed project and the short construction period, the resource topics outlined in CEQA Guidelines Appendix G have been evaluated to demonstrate that the proposed project would not result in a significant impact on any of these resources. The results of this evaluation are discussed in detail below.

Aesthetics

The proposed project is located in the Owens Valley which has many natural features that add to the aesthetic character of the region. This includes the Sierra Nevada Mountains to the west, the scattered Basin and Range intermontane system to the east, the open lands of the Owens Valley, and several river systems, wetlands, and other natural habitats. The Bishop General Plan also identifies the surrounding agricultural lands and tree-lined roads as important aesthetic resources in the area (City of Bishop 1993).

The established project alignments are not located within the viewshed of a designated state scenic highway. The nearest designated scenic highway, S.R. 168, is approximately 2,600 feet west of the closest portion of the established project alignments. While construction activities may be visible from two eligible state scenic highways, U.S. Route 395 and another segment of S.R. 168, these routes have not been officially designated as scenic under the California Scenic Highway Program (Caltrans 2018). Further, the proposed project involves only maintenance and minor improvement activities to existing underground collection system infrastructure; all work would take place within previously disturbed areas and would not result in tree removal, modification of prominent landforms, or visual impacts to scenic resources. Additionally, the proposed project does not include the construction of any new above-ground structures that would be visible from scenic highways or impact scenic vistas once construction is complete.

Agriculture and Forestry Resources

There are no Important Farmlands designated in the proposed project area (DOC 2022a), nor are there lands under Williamson Act Contracts (DOC 2022b). According to Inyo County GIS and City of Bishop GIS, the proposed project includes lands in the City of Bishop zoned as General Industrial, Open Space, Multiple Residential, and Single-Family Residential. The proposed project also includes lands in unincorporated Inyo County zoned as Open Space-40 Acre minimum and One Family Residential 7,200 square feet minimum (Inyo County 2025; City of Bishop 2025). There are no lands designated as

farmland, forestland, timberland, or timberland zoned for timberland production. Further, no changes in zoning or land use would occur as a result of the proposed project.

The established project alignments include LADWP lands which are leased to local ranchers for cattle grazing; however, the proposed project would be completed within existing easements held by ESCSD and would occur in previously disturbed areas which already house the existing collection system, as well as lands accessed under a letter of permission obtained from LADWP prior to construction. Construction activities would be minor and would not create any new permanent surface features which could impact these lands or their existing uses. Improvements to the collection system are expected to occur over the course of approximately 16 weeks; additionally, as construction would take place over several areas along the collection system alignment, no one area would be impacted for the entire duration of construction activities. Further, an Erosion and Sediment Control Plan shall be prepared for the proposed project which would include a restoration plan and other measures which would ensure disturbed farmland shall be restored to pre-project conditions or similar.

Air Quality and Greenhouse Gas Emissions

The proposed project involves maintenance and improvements to existing ESCSD infrastructure and would be completed using standard construction equipment. There is no significant earthwork, and the proposed project does not include the construction of new structures. Further, construction activities would be short in duration and would move along the existing alignment, which further reduces the potential for prolonged emissions in any single location which could impact sensitive receptors.

Temporary emissions from equipment and vehicles during construction are expected to be minimal and well below the significance thresholds established by the Great Basin Unified Air Pollution Control District due to the intensity and length of proposed project activities. The proposed project does not involve any long-term increase in vehicle trips, fuel use, or area-wide emissions. The proposed project would include the development of temporary groundwater dewatering wells, re-contouring if needed to restore disturbed areas, and liner installation may generate temporary noise and odor; however, dust, odors, or other localized air quality impacts would be temporary and as mentioned above would not affect any one receptor for an extended period of time due to the transient nature of construction activities.

Additionally, as discussed in the *Project Description*, Standard Operating Procedures shall be incorporated which would require equipment idling restrictions, equipment shut-off requirements to minimize emission of criteria pollutants, work area speed limits to reduce dust produced from construction vehicles, as well as construction noticing which would be sent to nearby receptors which may be temporarily affected to make them aware of temporary noise and odor impacts. As stated in the *Project Description* under *Project Operation and Maintenance*, ongoing operational activities following proposed project completion would remain the same as under current conditions. No new emission sources, facility expansions, or operational changes are proposed that would affect long-term air quality or energy use.

Additionally, greenhouse gas emissions from the proposed project would be limited to short-term construction equipment use and would not conflict with any applicable state or local climate action goals. The absence of new permanent infrastructure or energy demand ensures that the proposed project would

not contribute to a significant increase in greenhouse gas emissions over time; and therefore, the proposed project is not expected to result in any significant air quality or greenhouse gas impacts.

Biological Resources

Queried species searches were conducted to identify any flora and fauna species that have the potential to occur within or adjacent to the proposed project area. Wildlife species searches have identified 28 wildlife species with overlapping ranges within the proposed project area (CNDDDB 2025). Of these identified species, 13 have recorded occurrences within or adjacent to the proposed project area however these occurrences were all documented greater than 50 years ago. These species include Owen's sucker (*Catostomus fumeiventris*), Amargosa speckled dace (*Rhinichthys nevadensis nevadensis*), Owens tui chub (*Siphateles bicolor snyderi*), prairie falcon (*Falco mexicanus*), bank swallow (*Riparia riparia*), American bumble bee (*Bombus pensylvanicus*), Morrison bumble bee (*Bombus morrisoni*), Sierra Nevada red fox (*Vulpes vulpes necator pop. 2*), spotted bat (*Euderma maculatum*), silver-haired bat (*Lasionycteris noctivagans*), Owen's Valley vole (*Microtus californicus vallicola*), western white-tailed jackrabbit (*Lepus townsendii townsendii*), and California floater (*Anodonta californiensis*). However, the proposed project area is primarily comprised of heavily grazed pasture lands in and around the city of Bishop and are subject to frequent and regular disturbance as a result of grazing allotments. Due to all work occurring within previously disturbed areas and involving improvements to existing infrastructure with no new structures, there are no expected impacts on any aquatic species within waterways adjacent to the activities. In regard to avian species, nesting bird season typically occurs from early February to late September which could overlap with construction work windows. As a result, there is potential to encounter nesting species in the vicinity at the time of project activities as well as the possibility of late-season nesting birds. As per the Avoidance and Protection Measures for the proposed project, surveys for nesting birds shall be conducted prior to the start of construction. If active nests are detected during pre-activity surveys, construction activities would not occur until a qualified biologist determines that fledglings have left an active nest. In the event of any encounter with any terrestrial wildlife species while traversing the established project alignments, the crews shall halt their activities and wait for the species to leave the area of its own volition. If the species is not able to leave on its own, then a qualified professional shall be contacted to aid in the removal of the species from the proposed project area.

Plant species searches have also identified up to 47 species that have the potential to occur within the proposed project's region (CNPS 2025). Of these identified species, 7 have had recorded occurrences within or adjacent to the proposed project area (CNDDDB 2025) however these occurrences were recorded greater than 20 years prior. These species include Inyo County star-tulip (*Calochortus excavatus*), fiddleleaf hawksbeard (*Crepis runcinata*), Owens Valley checkerbloom (*Sidalcea covillei*), Parish's popcornflower (*Plagiobothrys parishii*), pinyon rockcress (*Boechera dispar*), frog's bit-buttercup (*Ranunculus hydrocharoides*), broadleaf pondweed (*Stuckenia striata*). However, the proposed project does not include any significant ground disturbance activities and consists of minor improvements and maintenance to existing infrastructure within previously disturbed areas. The land usage surrounding the established project alignments has been primarily used for cattle grazing, further emphasizing the high level of disturbance to the area. Additionally, while work is expected to occur over approximately 16 weeks, it would progress along several portions of the collection system alignment, and work would not remain stationary at any one location during the proposed project activities.

ESA biologists conducted focused special-status plant surveys on May 26 through 29th, 2026 along the entire study area, including a 10-foot buffer on either side of the five segments of the ESCSD collection system (**Attachment 1**). No special-status plants were observed within the study area during the focused surveys. Small portions of the proposed project area may support marginal native habitat and soils suitable for Owens Valley checkerbloom and Inyo County star tulip; however, neither species were observed during the focused surveys. Therefore, it is unlikely any special-status plant species would be directly or indirectly affected by the proposed project.

Desktop review of the National Wetlands Inventory (NWI) identified several aquatic features that overlap with the proposed project's activities (USFWS 2025). These features include several freshwater emergent wetlands, freshwater ponds, and riverine systems. The proposed project does not include any significant ground disturbance activities and involves improvements to existing infrastructure in previously disturbed areas used for cattle grazing. Therefore, it is unlikely that construction activities would result in any impact on existing wetland features. As previously mentioned, work would progress along established project alignments and would not remain in one location for an extended period of time. BMPs for water quality shall be implemented to prevent contamination through accidental release and guide clean-up if a spill occurs. Additionally, an Erosion and Sediment Control Plan shall be prepared for the proposed project prior to construction which would include applicable erosion control measures as needed, as well as a post-construction restoration plan.

Overall, given the short-term, low-impact nature of the work and the use of appropriate BMPs and Avoidance and Protection measures, the proposed project is not expected to have any significant impacts on biological resources within the area.

Cultural, Tribal Cultural, and Paleontological Resources

The Owens Valley holds significant archaeological and historical value due to long-term settlement by the Northern Owens Valley Paiute as well as later settlement by European and American settlers. The City of Bishop General Plan notes that the area has a rich cultural record and includes several sites such as the St. Francis Ranch, the Laws townsite, and remnants of various structures (City of Bishop 1993). However, the proposed project would not include significant ground disturbance and would consist of minor improvements and maintenance to the existing ESCSD collection system within previously disturbed areas primarily used for cattle grazing. The proposed project may include temporary groundwater dewatering wells and re-contouring as needed following construction to restored disturbed areas; however, ground disturbance would generally be limited and it is unlikely that previously undiscovered cultural, tribal cultural, or paleontological resources along the established project alignments would be encountered. Any resources present would likely have been disturbed or documented during the original construction of the collection system or through ongoing grazing uses.

Although impacts on cultural, tribal cultural, or paleontological resources are not anticipated, the proposed project would comply with all applicable laws and procedures in the event of an inadvertent discovery at surface level. In accordance with CEQA Guidelines Section 15064.5 and Public Resources Code Sections 5097.94 and 5097.98, appropriate notifications and consultations shall be initiated, including with affiliated Native American tribes if tribal cultural resources are involved.

Energy

The proposed project includes minor improvements and maintenance to the existing ESCSD collection system. The proposed project would not result in a permanent increase in the use of energy resources, rather the proposed project would allow for the ESCSD collection system and WWTP to resume operating at design capacity. The proposed project would include temporary use of gasoline and diesel fuels; however, this would be a minor and temporary increase which would conclude with completion of construction activities. Further, the project contractor shall be required to follow all State and federal regulations regarding energy conservation and fuel efficiency and would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Geology, Soils, and Mineral Resources

The proposed project involves maintenance and minor improvements to the existing ESCSD collection system. All work would be conducted within existing collection system alignments and previously disturbed areas accessed under a letter of permission obtained from LADWP as well as temporary encroachment permits. There would be limited ground disturbance in areas where temporary groundwater dewatering wells would be needed and recounting if needed to restore disturbed areas; however, no significant earthwork is required. Because the proposed project does not involve any significant soil disturbance or subsurface work, there is low potential for impacts related to soil erosion, loss of topsoil, or disruption of geologic features such as landslides or faults. However, the Erosion and Sediment Control Plan prepared for the proposed project would include best management practices to ensure soil impacts would not be significant. This would include the use of good housekeeping measures, fiber rolls, silt fence, rock bags, crushed rock, hydro-mulch, straw, shredded wood, temporary drivable access panels, dewatering “dirt-bags”, and other similar measures as needed. The Erosion and Sediment Control Plan would also include a restoration plan which would restore disturbed areas to pre-project conditions or similar.

Further, while the established project alignments are located within the Owens Valley Fault System, which is identified as an active fault zone under the Alquist-Priolo Earthquake Fault Zoning Act (DOC 2025); the established project alignments are not within an area mapped for liquefaction or landslides. The proposed project would not involve the construction of habitable structures or permanent buildings and would not place people or structures in proximity to fault rupture hazards. As the proposed project is limited to maintenance and improvements to existing infrastructure and involves no new development or expansion, it would not be subject to the design or setback requirements of the Alquist-Priolo Act. Additionally, no work would take place in areas with unstable soils or known geologic hazards beyond those already considered in the original system design.

The established project alignments are also not located within or near any designated mineral resource zones, and proposed activities would not interfere with current or future access to regionally or locally important mineral deposits beyond existing conditions. The established project alignments do not contain any active mines; the closest would be approximately 1.2 miles south of the established project alignments (DOC 2016).

Hazards and Hazardous Materials

Small quantities of hazardous materials such as fuel, lubricants, cleaning agents, or materials related to CIPP liner and seal installation may be used during construction activities. These materials shall be managed using standard operating procedures and BMPs including proper storage and use during maintenance of equipment, as well as for spill prevention and clean-up to avoid any risk to water quality through accidental release. A school is located approximately 0.12 miles north of the central alignment near S.R. 168 (see Figure 2) as well as houses along various portions of the established project alignments. However, construction activities would progress along the established alignments, meaning no one location would be active for an extended period of time. The mobile nature of the proposed project would ensure that sensitive receptors such as the nearby school would not experience continuous or prolonged exposure to construction activity or hazardous materials.

Dewatering wells may be used for certain portions of the alignment where groundwater is relatively close to the surface and could impede work in these areas. If any temporary dewatering is needed for construction activities, groundwater would be directed into the ESCSD collection system or directly applied to adjacent agricultural lands. Land discharge shall be consistent with the conditions of the Low-Threat Discharge to Land permit which would be obtained prior to construction from the Lahontan Regional Water Quality Control Board (Region 6).

As discussed above, the established project alignments are not listed on the Cortese List (SWRCB 2025; DTSC 2025). However, three nearby sites remain designated as "open" in state environmental databases. These include two LUST cleanup sites (Bishop Veterinary Hospital and LLO Gas) and one Voluntary Cleanup Site (Eastern Sierra Tri-County Fairgrounds). Since the proposed project does not involve significant ground disturbance and no work would occur directly within or adjacent to these locations, there is no anticipated risk of contaminant exposure.

The Eastern Sierra Regional Airport is located about 0.74 miles east of the established project alignments. However, the proposed project does not involve tall equipment, permanent structures, or any activity that could interfere with air traffic or airport operations. Further, as discussed in *Wildfire* below, while construction activities may temporarily increase wildfire risk, this increase would be marginal and following completion of construction wildfire risk would be similar to existing conditions. Given the short-term, low-impact nature of the work and the use of appropriate BMPs and Standard Operating Procedures, the proposed project is not expected to result in any significant impacts related to hazards or hazardous materials.

Hydrology and Water Quality

The proposed project involves maintenance and minor improvements to existing ESCSD infrastructure within previously disturbed areas. No significant ground disturbance, excavation, or grading is planned. Dewatering wells may be used for certain portions of the alignment where groundwater is relatively close to the land surface and could impede work. However, these wells would be temporary and would be backfilled following construction activities and groundwater would be released onto adjacent agricultural fields, which are already regularly flood irrigated, allowing water to percolate back into the groundwater systems. Further, the proposed project would not construct any new impervious features; therefore, the proposed project would not change drainage patterns, increase impervious surfaces, or result in a conflict

with a groundwater management plan. If any temporary dewatering is needed for construction activities, water would be directed into the ESCSD collection system or directly applied to adjacent agricultural lands. Land discharge shall be consistent with the conditions of the Low-Threat Discharge to Land permit which would be obtained prior to construction from the Lahontan Regional Water Quality Control Board. Additional BMPs and Standard Operating Procedures shall be used for hazardous materials, such as proper storage and use during maintenance of equipment, as well as spill prevention and clean-up to avoid any risk to water quality through accidental release. Additionally, if the potential exists for loose sediment to run off into nearby waterways, straw wattles or other sediment control measures shall be used to prevent sediment runoff consistent with the Erosion and Sediment Control Plan prepared for the proposed project.

Although several waterways are located near the established project alignments, including North Fork Bishop Creek, Mac Iver Ditch, Yaney Ditch, Giraud Ditch, North Indian Ditch, A1 Ditch, and Bishop Creek Canal, the proposed project is not expected to affect surface water resources due to its small scale and limited scope which would not include ground disturbing activities or alteration of a waterway. Measures included in the Erosion and Sediment Control Plan prepared for the proposed project would further reduce any potential impacts to these waterways.

FEMA is responsible for designating flood hazard zones to inform flood insurance rates as part of the National Flood Insurance Program. Pursuant to this effort, FEMA coordinates with local communities to map flood hazard zones which are available through the National Flood hazard Layer Viewer. The established project alignments are located within areas mapped by FEMA as 1 percent and 0.2 annual chance flood zones (FEMA 2025). An annual flood chance is the chance that flooding would occur within any given year; for example, a 1 percent flood chance means there is a 1 percent chance flooding would occur within any given year. However, the proposed project does not include new structures or changes that would increase flood risk or the number of people exposed to flooding. Additionally, the established project alignments are not near a large water body; and therefore, are not at risk from tsunamis, seiche, or mudflow.

Land Use and Planning

The proposed project includes lands in the City of Bishop zoned as General Industrial, Open Space, Multiple Residential, and Single-Family Residential. The proposed project also includes lands in unincorporated Inyo County zoned as Open Space-40 Acre minimum and One Family Residential 7,200 square feet minimum (Inyo County 2025; City of Bishop 2025). The proposed project does not include any changes to land use and would occur in lands used for ranching; and therefore, would not divide an established community

Population and Housing

The proposed project would not increase the capacity of the existing ESCSD collection system, rather it would include minor improvements and maintenance that would allow the collection system to operate at its design capacity. As such, the proposed project would not induce population growth, either directly or indirectly, and would have no impact on existing or planned housing. No new housing construction or displacement of existing housing or residents would occur as a result of the proposed improvements.

Noise

All work would occur within shall be limited to daytime hours consistent with local noise ordinances and would occur Monday through Friday within standard working hours (7 a.m. to 7 p.m.). Construction-related noise is expected to be typical of minor utility maintenance work, including equipment such as light-duty trucks, generators, and hand tools; liner curing would also produce an additional source of temporary noise through the use of pressurized air, or if needed steam, but use of these methods would be temporary. No pile driving, heavy demolition, or prolonged use of high-impact equipment is anticipated.

The proposed project area is adjacent to existing housing in several locations, as well as near a school located approximately 0.12 miles to the north of the established project alignments (see Figure 2). However, the mobile nature of the proposed project would ensure that sensitive receptors such as the nearby school would not experience continuous or prolonged exposure to construction activity. Additionally, construction noticing shall be sent to nearby sensitive receptors which could be impacted by construction activities, alerting them of temporary noise impacts. Further, while the established project alignments are located approximately 0.74 miles west of the Eastern Sierra Regional Airport, the proposed project would not include any new housing or create new jobs in the proposed project area; as such, there is minimal risk of exposing people in the proposed project area to excessive airport-related noise. The proposed project does not increase the number of people on-site or change existing land uses and therefore would not intensify noise exposure from aircraft.

Public Services and Service Systems

The proposed project would include only minor improvements and maintenance to the ESCSD collection system. It would not increase the system's capacity beyond its original design, nor would it involve any expansion of the existing infrastructure. As discussed above, the proposed project would not directly or indirectly induce population growth. Therefore, it would not increase demand for public services in a manner that would require the construction of new facilities or affect emergency response times.

Further, the proposed project would not result in the relocation or construction of other utility services. Temporary water use may be necessary during the installation of collection system liners and manhole seals; however, this water use would be short-term and would not result in a permanent increase in demand. In addition, small amounts of wastewater may be generated from limited dewatering or installation activities, along with minor solid waste associated with construction materials. However, these impacts would be temporary and confined to the construction phase. As required by law, the proposed project would comply with all State and federal regulations related to wastewater management and solid waste disposal.

Recreation

No recreation facilities are located within the established project alignments. The closest recreational facilities would be Bishop City Park and the Bishop Dog Bark located adjacent to the portion of the established project alignment along E Yaney Street and Spruce Street (see Figure 2); however, the proposed project would not impact access to these facilities. As discussed above, the proposed project would include maintenance and improvements to the existing ESCSD collection system and would not result directly or indirectly in an increase in population. As such, the proposed project would not increase the use of existing recreational facilities or result in the need for new or expanded recreational facilities.

Transportation

As discussed in the *Project Description* section, as the proposed project includes several segments of the collection system alignment, several roadways may potentially be used to access portions of the established project alignments (see Figure 2). Primary access would be provided via U.S. Route 395, U.S. Route 6, and S.R. 168. These regional highways would serve as the main haul routes for delivering construction materials, equipment, and removing any waste or debris from the alignment. Various local roadways would be used to access specific work and staging areas. While construction activities would utilize regional and local roadways, these activities would not significantly increase traffic volumes, and any increase in local traffic would be temporary. Additionally, while the proposed project is expected take place over approximately 16 weeks, the proposed project includes several segments of the collection system along which work would progress; therefore, any individual area would not experience the full duration of construction activities or associated traffic.

Further, the proposed project would not include any new permanent trips which could impact vehicle miles travelled pursuant to CEQA Guidelines Section 15064.3(b). Nor would the proposed project introduce new geometric features to roadways which could result in hazards. As mentioned previously, the proposed project may be required to obtain an encroachment permit from Caltrans and submit traffic management plans to the City of Bishop and Inyo County for approval for any collection system liner or manhole seal installation work within a roadway (see Table 2). However, roadway work would be temporary and as discussed above, no one roadway would be affected during the entire length of the proposed project, reducing disruptions to traffic and emergency access. Additionally, if required the proposed project shall comply with any conditions of approval outlined in the encroachment permit or traffic management plans issued by said responsible agencies to avoid disruption of traffic or emergency access.

Wildfire

The established project alignments are within several Fire Hazard Severity Zones as designated by CAL FIRE; this includes Moderate, High, and Very High Fire Hazard Severity Zones within State Responsibility Areas; High Fire Hazard Severity Zones within Local Responsibility Areas; and Moderate Fire Hazard Severity Zones within a Federal Responsibility Area (CAL FIRE 2025). The topography of the area is generally flat and surrounded by mountain ranges. Vegetation in the proposed project area generally includes native and non-native trees as well as grasslands (City of Bishop 1993).

As mentioned throughout this document, the proposed project includes minor improvements and maintenance to restore design capacity of the existing ESCSD collection system. No significant ground disturbance would occur. Further, the proposed project would not include any new structures or infrastructure which could exacerbate fire risk including roads, fire breaks, emergency water sources, or other utilities. The proposed project would occur on grazing lands which have not been developed and do not include residences which could expose people near the established project alignments to increased wildfire risk or pollutants from a wildfire. Further, the proposed project would not increase population or make modifications to roadways which could impact emergency or evacuation access. Additionally, the construction contractor shall be required to follow all safety protocols and comply with CAL FIRE and local codes for fire prevention and hazardous and flammable materials. As such, while construction

activities may temporarily increase wildfire risk, following completion of the proposed project wildfire risk would be similar to existing conditions.

Determination

The proposed project meets the criteria for a Categorical Exemption: Class 1(b) because the proposed project would involve minor improvements to existing publicly owned utility infrastructure with no expansion of current use. Rather than expanding the ESCSD collection system, the proposed project would restore system integrity, enhance resilience to future storm events, and reduce stormwater inflow and groundwater infiltration, allowing continued operation within the original design capacity. Further, as described in the *Environmental Evaluation*, the proposed project would not result in any significant environmental impacts to the resource topics discussed above, consistent with CEQA Guidelines Appendix G.

Therefore, the proposed project is consistent with the scope of Class 1(b) exemptions as defined in CEQA Guidelines Section 15301 and the proposed project qualifies for exemption under CEQA Guidelines Article 19.

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Attachment 1
**Special-Status Plant Surveys
Letter Report**



2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 [phone](tel:916.564.4500)
916.564.4501 [fax](tel:916.564.4501)

esassoc.com

June 17, 2026

Ms. Jennifer Krafcheck
General Manager
Eastern Sierra Community Service District
300 West Line Street, Suite D
Bishop, CA 93515

Subject: Eastern Sierra Community Service District CY2022 Disaster Water Grants Program Focused Special-status Plant Surveys

Dear Jennifer:

Environmental Science Associates (ESA) is pleased to provide you with this Focused special-status plant surveys letter report for the Eastern Sierra Community Service District (ESCSD) CY2022 Disaster Water Grants Program (proposed project). This report documents the findings of focused special-status plant surveys conducted for the proposed project.

Project Description and Location

ESCSD is a special district that provides wastewater services to areas surrounding the City of Bishop in Inyo County, California (see **Figure 1, Regional Location**). ESCSD is tasked by property owners and ratepayers within its service area to operate and maintain critical infrastructure and services (ESCSD 2025). The ESCSD service area includes several non-contiguous areas within the City of Bishop's sphere of influence including communities to the northwest and southwest; additionally, ESCSD manages wastewater flows from the Bishop Paiute Indian Community (Bartle Wells Associates 2023). ESCSD also operates a wastewater treatment plant (WWTP) and a treated effluent discharge area.

The ESCSD service area and the surrounding region experienced severe storms with prolonged snowfall and rainfall from November 2022 through January 2023. On January 14, 2023, a Presidentially Declared Flood Disaster was issued in California (DR-4683-CA) for severe winter storms, flooding, landslides, and mudslides. This intense weather raised groundwater levels in the ESCSD service area resulting in groundwater entering the collection system. Although some sewer mains at creek crossings are encased in concrete, much of the system consists of older clay pipes that experienced excessive infiltration. Additionally, the resulting high groundwater levels led to significant infiltration into the sewer main pipelines and inflow through manholes. The increased flow overwhelmed the local collection system and conveyed excessive stormwater combined with wastewater to the WWTP, exceeding its designed treatment capacity.

A draft Preliminary Engineering Report (PER) was prepared by Lumos & Associates in August 2024, and an updated PER was prepared in November 2024 (Lumos & Associates 2024) which includes additional information regarding the proposed project referenced herein. The PER was utilized in preparation of a

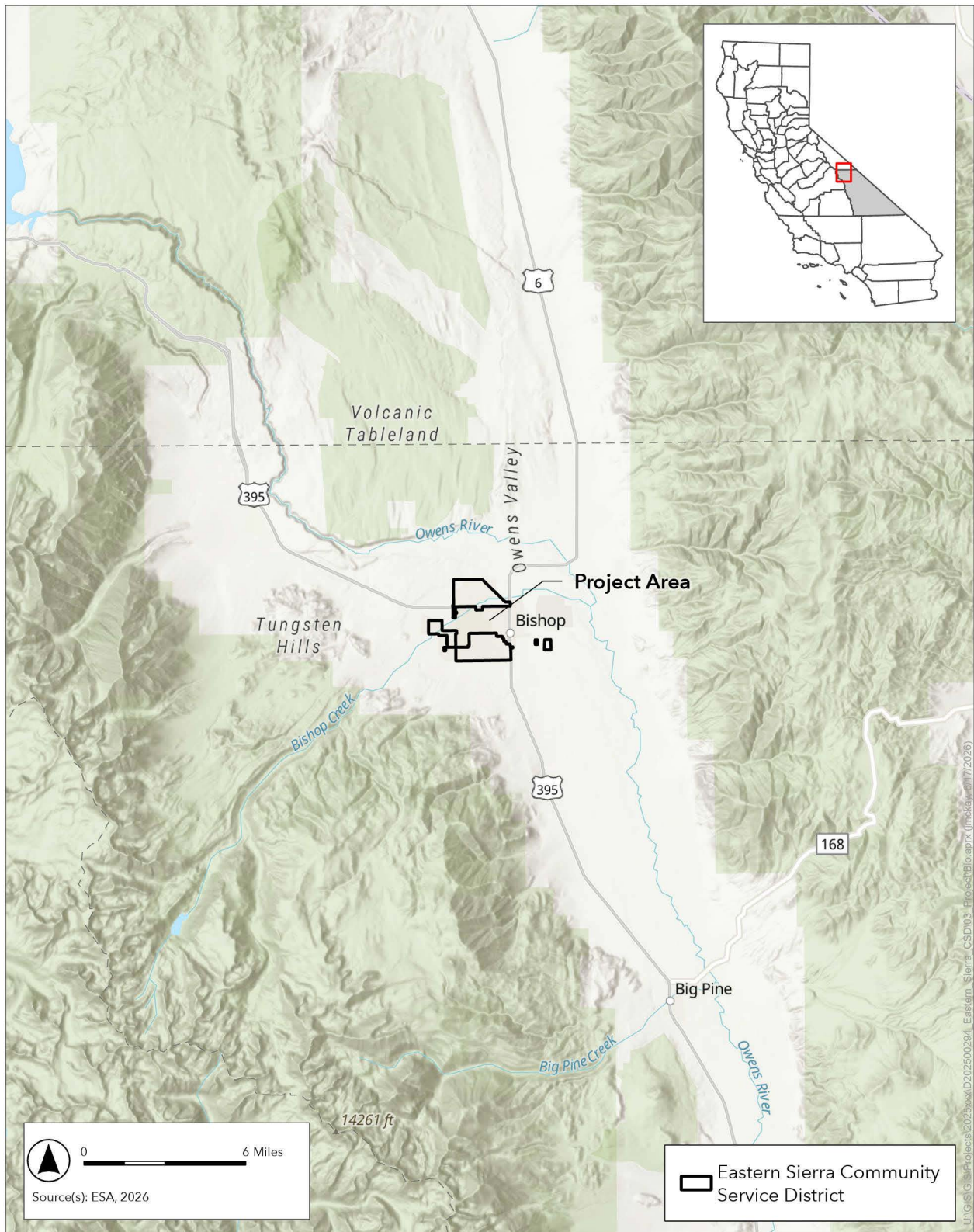


Figure 1
Regional Vicinity
Eastern Sierra Community Service District





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National Environmental Quality Act (NEPA) Categorical Exclusion prepared by the U.S. Department of Agriculture Rural Development in October of 2024. The proposed project was determined to be a NEPA Categorical Exclusion in accordance with 7 CFR Part 1970. It was determined that there would be no adverse environmental impact caused by the proposed project and therefore no mitigation was required.

Project Location

The proposed project would involve construction activities in the City of Bishop and unincorporated Inyo County along five segments of the ESCSD collection system (established project alignments), located within, and in proximity to, the ESCSD service area as shown in **Figure 2, Project Location**. Specifically, the new flexible cured-in-place pipe (CIPP) lining would include the following segments of the ESCSD collection system:

- two segments adjacent to United States (U.S.) Route 395 and U.S. Route 6, which extend to the northwest and connect to sewer main pipelines along Dixon Road and serve several nearby mobile home communities to the west;
- one segment near the intersection of Spruce Street and East Yaney Street, on a parcel adjacent to the Shady Rest Trailer Park to the southeast;
- one segment approximately 500 feet south of State Route (S.R.) 168, extending from South Barlow Lane; and
- one branched segment that extends from South Barlow Lane and Schober Lane before merging and continuing eastward to the ESCSD WWTP, crossing both U.S. Route 395 and S.R. 168.

In accordance with the Los Angeles Department of Water & Power's Letter of Permission dated April 30, 2026 (LADWP 2026), ESA biologists were contracted to provide focused special-status plant species surveys for the proposed project.

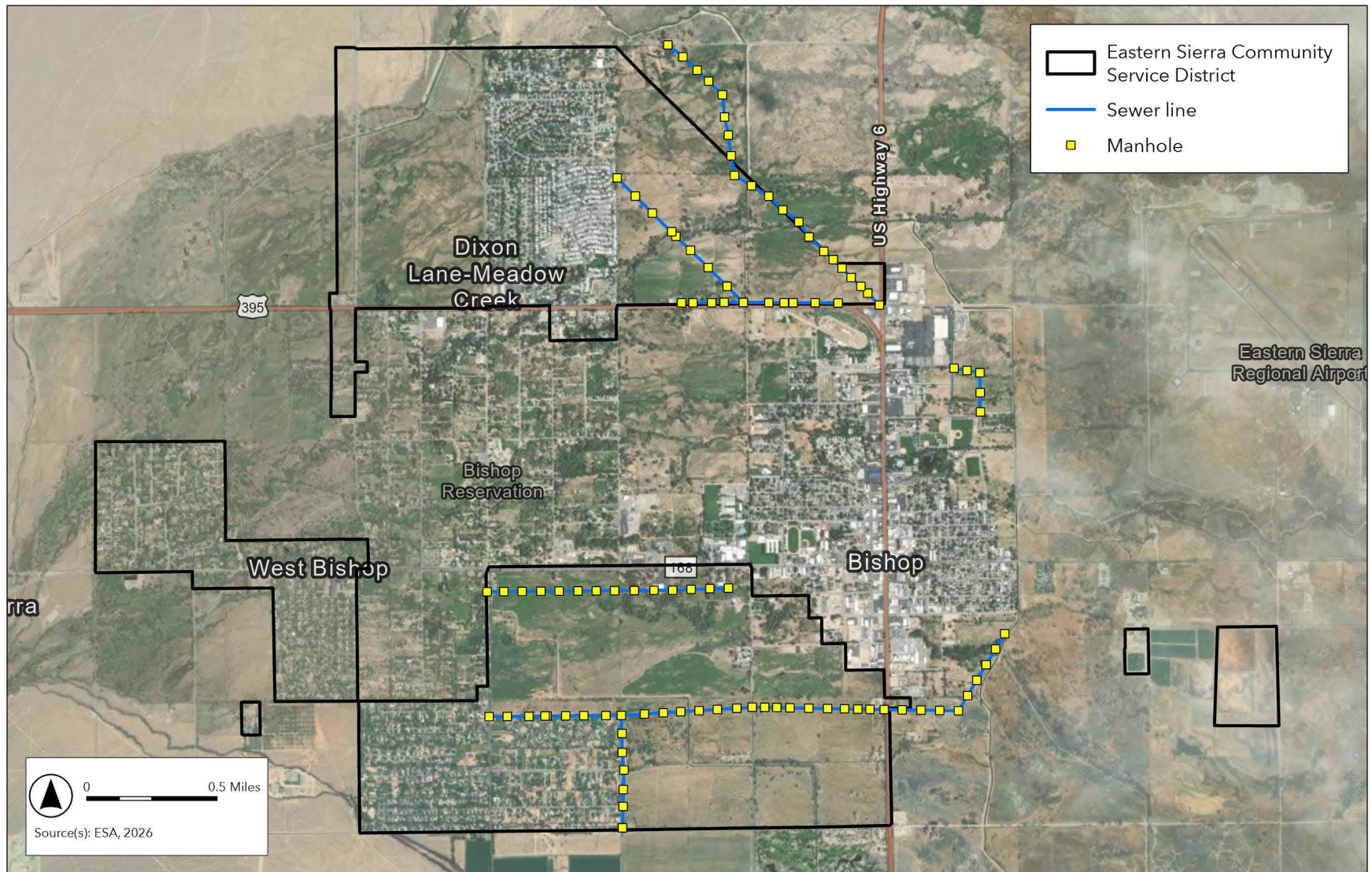


Figure 2
Project Location
Eastern Sierra Community Service District

Methodology

Literature Review

Prior to conducting the field survey, ESA conducted a query of available resource inventory databases to analyze the potential for special-status plants to occur within the study area:

- California Natural Diversity Data Base (CNDDB) (CDFW 2026). Database was queried for special status species records in the Bishop U.S. Geological Survey (USGS) 7.5-minute quadrangle and eight surrounding quadrangles including Rovana, Fish Slough, Laws, Poleta Canyon, Big Pine, Coyote Flat, Mt. Thompson, and Tungsten Hills.
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California (CNPS 2026). Database was queried for special status species records in the Bishop USGS 7.5-minute quadrangle and eight surrounding quadrangles including Rovana, Fish Slough, Laws, Poleta Canyon, Big Pine, Coyote Flat, Mt. Thompson, and Tungsten Hills.
- Natural Resource Conservation Service (NRCS) Web Soil Survey (NRCS 2026)

Rare Plant Survey

ESA botanists Douglas Gordon-Blackwood and Dillon Travis, PhD conducted the focused special-status plant surveys on May 26 through 29th, 2026 along the entire study area, including a 10-foot buffer on either side of the five segments of the ESCSD collection system (referred to herein as the study area). The survey was conducted following published agency guidelines by walking transects, where feasible, and making close observations at ground level during the respective blooming periods of potential plant species to ensure detection of any special-status plants. The potential for special-status plant species was assessed based upon the known occurrence of species in the area as identified from CDFW, USFWS and CNPS databases (see section *Literature Review*), and the presence or absence of suitable habitat within the study area. Suitable habitat was defined as areas with appropriate vegetation communities, soils and/or topography (elevation above mean sea level) to support the species based on known occurrences in those habitats and/or CDFW and CNPS documented habitat descriptions for the species. The definitions of suitable habitat were then compared against the vegetation mapping conducted for the study area and local knowledge. The nearest and most recent vouchered collections¹ of Owens Valley checkerbloom (*Sidalcea covillei*; State Endangered, CRPR 1B.1; blooming period April – June), and Inyo County star-tulip (*Calochortus plummerae*; CRPR 1B.1; blooming period April – July) were visited as reference sites to determine plant phenology during the time of the survey. A compendium of plant species observed during

¹ CNDDB occurrence #17 of *Sidalcea covillei* #EONdx 1411, Chloe Tilton's CCH Voucher #SBBG264996 of *Sidalcea covillei* (<https://www.cch2.org/portal/collections/individual/index.php?occid=6031116>), Chloe Tilton's CCH Voucher # SBBG264328 of *Calochortus excavatus* (<https://www.cch2.org/portal/collections/individual/index.php?occid=6030444>), Mike Russler's Calflora observation of *Sidalcea covillei* (https://www.calflora.org/entry/occdetail.html?seq_num=io179441&taxon=Sidalcea+covillei), and Jim Andre's CCH Voucher of *Calochortus excavatus* #UCR-BPS-236141 (<https://www.cch2.org/portal/collections/individual/index.php?occid=1653122>)



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the survey is included in **Attachment A – Floral Compendium**. Representative site photographs are included in **Attachment B – Photographs**. CNDDDB forms for each reference site visited are included in **Attachment C – CNDDDB Forms**. The

Results

No special-status plants were observed within the study area during the focused surveys, which was conducted during the appropriate blooming period for special-status plants that could potentially occur within the study area. The study area is primarily comprised of heavily grazed pasture lands in and around the city of Bishop and are subject to frequent and regular disturbance as a result of grazing allotments. Small portions of the study area may support marginal native habitat and soils suitable for Owens Valley checkerbloom and Inyo County star tulip, but neither species were observed during the focused surveys and were determined to be conspicuous and blooming during the survey period.

If there are any questions regarding this report or the results, please feel free to reach out to Douglas Gordon-Blackwood at DGordon-Blackwood@esassoc.com or 949-870-1511.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas Gordon-Blackwood", written in a cursive style.

Douglas Gordon-Blackwood
Senior Botanist

Attachments:

- Attachment A: Floral Compendium
- Attachment B: Photographs
- Attachment C: CNDDDB Forms



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June 17, 2026
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References

- CDFW. 2026. *California Natural Diversity Database (CNDDB)*. May 20. Accessed March 20, 2026. <https://apps.wildlife.ca.gov/rarefind/view/RareFind.aspx>.
- CNPS. 2026. *Inventory of Rare and Endangered Plants of California (online edition, v9.5.1)*. May 20. Accessed May 20, 2026. <https://rareplants.cnps.org/Search/Advanced/>.
- LADWP. 2026. "Eastern Sierra Community Service District - Sewer Cured-In-Place Pipe Project Permission Letter." Bishop, CA, April 30.
- NRCS. 2026. *Web Soil Survey*. May 20. Accessed May 20, 2026. <https://websoilsurvey.nrcs.usda.gov/app/>.



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Attachment A

Floral Compendium

ATTACHMENT A

Floral Compendium

Family	Scientific Name	Common Name	Nativity	Special Status?
EUDICOTS				
AMARANTHACEAE		AMARANTH FAMILY		
	<i>Suaeda nigra</i>	bush seepweed	Native	No
APOCYNACEAE		DOGBANE FAMILY		
	<i>Asclepias fascicularis</i>	narrow-leaf milkweed	Native	No
	<i>Asclepias speciosa</i>	showy milkweed	Native	No
ASTERACEAE		SUNFLOWER FAMILY		
	<i>Ambrosia acanthicarpa</i>	annual bur-sage	Native	No
	<i>Artemisia tridentata</i> subsp. <i>tridentata</i>	big sagebrush	Native	No
	<i>Ericameria nauseosa</i> var. <i>oreophila</i>	rubber rabbitbrush	Native	No
	<i>Erigeron divergens</i>	diffuse daisy	Native	No
	<i>Helianthus annuus</i>	western sunflower	Native	No
	<i>Lactuca serriola</i>	prickly lettuce	Naturalized	No
	<i>Lessingia glandulifera</i>	vinegar weed	Native	No
	<i>Madia gracilis</i>	slender madia	Native	No
	<i>Malacothrix glabrata</i>	smooth desert dandelion	Native	No
	<i>Pectis papposa</i> var. <i>papposa</i>	chinch-weed	Native	No
	<i>Pseudognaphalium stramineum</i>	cotton-batting plant	Native	No
	<i>Sonchus asper</i> subsp. <i>asper</i>	prickly sow thistle	Naturalized	No
	<i>Taraxacum officinale</i>	common dandelion	Naturalized	No
	<i>Tragopogon dubius</i>	goat's beard	Naturalized	No
BORAGINACEAE		BORAGE FAMILY		
	<i>Myosotis scorpioides</i>	water forget-me-not	Naturalized	No
BRASSICACEAE		MUSTARD FAMILY		
	<i>Descurainia pinnata</i> subsp. <i>glabra</i>	smooth western tansy-mustard	Native	No
	<i>Lepidium lasiocarpum</i> subsp. <i>lasiocarpum</i>	sand peppergrass	Native	No
	<i>Lepidium latifolium</i>	sand peppergrass	Naturalized	No
	<i>Rorippa palustris</i>	bog yellow cress	Native	No
	<i>Thelypodium crispum</i>	wavy-leaved thelypodium	Native	No
CANNABACEAE		HEMP FAMILY		
	<i>Celtis reticulata</i>	netleaf hackberry	Native	No

Family	Scientific Name	Common Name	Nativity	Special Status?
CLEOMACEAE		SPIDERFLOWER FAMILY		
	<i>Cleomella lutea</i>	yellow bee plant	Native	No
	<i>Cleomella plocasperma</i>	cleomella	Native	No
ELAEAGNACEAE		RUSSIAN OLIVE FAMILY		
	<i>Elaeagnus angustifolia</i>	Russian olive	Naturalized	No
FABACEAE		LEGUME FAMILY		
	<i>Glycyrrhiza lepidota</i>	wild licorice	Native	No
	<i>Medicago sativa</i>	alfalfa	Naturalized	No
	<i>Melilotus officinalis</i>	yellow sweetclover	Naturalized	No
GERANIACEAE		GERANIUM FAMILY		
	<i>Erodium cicutarium</i>	redstem filaree	Naturalized	No
LAMIACEAE		MINT FAMILY		
	<i>Mentha spicata</i>	spearmint	Naturalized	No
LOASACEAE		LOASA FAMILY		
	<i>Mentzelia albicaulis</i>	white-stem blazing star	Native	No
ONAGRACEAE		EVENING-PRIMROSE FAMILY		
	<i>Epilobium ciliatum</i> subsp. <i>ciliatum</i>	willow herb	Native	No
PHRYMACEAE		LOPSEED FAMILY		
	<i>Erythranthe guttata</i>	seep monkeyflower	Native	No
PLANTAGINACEAE		PLANTAIN FAMILY		
	<i>Callitriche heterophylla</i>	water starwort	Native	No
	<i>Plantago major</i>	common plantain	Naturalized	No
	<i>Veronica anagallis-aquatica</i>	water speedwell	Naturalized	No
POLEMONIACEAE		PHLOX FAMILY		
	<i>Eriastrum wilcoxii</i>	Wilcox's eriastrum	Native	No
POLYGONACEAE		BUCKWHEAT FAMILY		
	<i>Eriogonum baileyi</i>	Bailey buckwheat	Native	No
	<i>Persicaria amphibia</i>	kelp smartweed	Native	No
	<i>Rumex crispus</i>	curly dock	Naturalized	No
RANUNCULACEAE		BUTTERCUP FAMILY		
	<i>Ranunculus flammula</i> var. <i>flammula</i>	greater creeping sandwort	Native	No
ROSACEAE		ROSE FAMILY		
	<i>Potentilla gracilis</i>	slender cinquefoil	Native	No
	<i>Rosa woodsii</i> subsp. <i>ultramontana</i>	interior rose	Native	No
	<i>Rubus armeniacus</i>	Himalayan blackberry	Naturalized	No
SALICACEAE		WILLOW FAMILY		
	<i>Populus fremontii</i> subsp. <i>fremontii</i>	western cottonwood	Native	No
	<i>Salix exigua</i> var. <i>exigua</i>	narrow-leaf willow	Native	No
ULMACEAE		ELM FAMILY		
	<i>Ulmus parvifolia</i>	Chinese elm	Naturalized	No
URTICACEAE		NETTLE FAMILY		
	<i>Urtica dioica</i>	stinging nettle	Native	No

Family	Scientific Name	Common Name	Nativity	Special Status?
FERNS				
EQUISETACEAE		HORSETAIL FAMILY		
	<i>Equisetum arvense</i>	Common Horsetail	Native	No
	<i>Equisetum hyemale</i> subsp. <i>affine</i>	Common Scouring Rush	Native	No
MONOCOTS				
ALISMACEAE		WATER-PLANTAIN FAMILY		
	<i>Sagittaria cuneata</i>	tule potato	Native	No
CYPERACEAE		SEDGE FAMILY		
	<i>Carex nebrascensis</i>	nebraska sedge	Native	No
	<i>Carex praegracilis</i>	cluster field sedge	Native	No
	<i>Eleocharis macrostachya</i>	pale spike-rush	Native	No
	<i>Eleocharis parishii</i>	parish's spike-rush	Native	No
	<i>Scirpus microcarpus</i>	small-fruit bulrush	Native	No
IRIDACEAE		IRIS FAMILY		
	<i>Iris missouriensis</i>	western blue flag	Native	No
	<i>Iris pseudacorus</i>	pale yellow iris	Naturalized	No
JUNCACEAE		RUSH FAMILY		
	<i>Juncus balticus</i> subsp. <i>ater</i>	wire rush	Native	No
	<i>Juncus bufonius</i> var. <i>bufonius</i>	toad rush	Native	No
	<i>Juncus torreyi</i>	Torrey's rush	Native	No
POACEAE		GRASS FAMILY		
	<i>Bromus catharticus</i> var. <i>catharticus</i>	rescue grass	Naturalized	No
	<i>Bromus tectorum</i>	cheat grass	Naturalized	No
	<i>Cynodon dactylon</i>	Bermuda grass	Naturalized	No
	<i>Distichlis spicata</i>	salt grass	Native	No
	<i>Elymus triticoides</i>	beardless wild rye	Native	No
	<i>Festuca pratensis</i>	meadow fescue	Native	No
	<i>Hordeum brachyantherum</i> subsp. <i>brachyantherum</i>	northern barley	Native	No
	<i>Hordeum jubatum</i> subsp. <i>jubatum</i>	foxtail barley	Native	No

Key to Species Listing Status Codes

FE	Federally Endangered	SE	State Listed as Endangered
FT	Federally Threatened	ST	State Listed as Threatened
FC	Federal Candidate	SCE	State Candidate for Endangered
FPE	Federally Proposed as Endangered	SCT	State Candidate for Threatened
FPT	Federally Proposed as Threatened	SFP	State Fully Protected
FPD	Federally Proposed for Delisting		

California Native Plant Society (CNPS)

Rank 1A: Presumed extirpated in California and either Rare or Extinct elsewhere.

Rank 1B: Rare, threatened, or endangered throughout their range.

Rank 2A: Presumed extirpated in California, but more common elsewhere.

Rank 2B: Rare, threatened, or endangered in California, but more common in other states.

Rank 3: Plant species for which additional information is needed before rarity can be determined.

Rank 4: Species of limited distribution in California (i.e., naturally rare in the wild), but whose existence does not appear to be susceptible to threat.

New Threat Code extensions and their meanings:

1 Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)

2 Fairly endangered in California (20-80% occurrences threatened)

3 Not very endangered in California (<20% of occurrences threatened or no current threats known)

Source: ESA 2026.



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Attachment B Photographs



Photograph 1: Photograph depicts western most manhole situated along ESCSD Collection System Segment between Spruce Street and East Yaney Street, facing west (Taken on 05/27/2026).



Photograph 2: Photograph depicts ESCSD Collection System Segment between Spruce Street and East Yaney Street facing south towards Shady Rest Trailer Park. Photograph depicts active grazing within the study area (Taken on 05/27/2026).



Photograph 3: Photograph depicts ESCSD Collection System Segment staking northwest of US Route 395 and U.S. Route 6, facing north towards North Fork Bishop Creek (Taken on 05/27/2026).



Photograph 4: Photograph depicts ESCSD Collection System Segment staking along project segment northwest of US Route 395 and U.S. Route 6, facing southeast towards U.S. Route 6 (Taken on 05/27/2026).



Photograph 5: Photograph depicts ESCSD Collection System Segment northeast of U.S. Route 395 and U.S. Route 6 where segment intersects the Highlands Family Mobile Home Community, facing northwest (Taken on 05/27/2026).



Photograph 6: Photograph depicts ESCSD Collection System Segment east of U.S. Route 395 and south of East South Road, facing southeast (Taken on 05/28/2026).



Photograph 7: Photograph depicts ESCSD Collection System Segment between Sunland Drive and U.S. Route 395, facing northwest (Taken on 05/28/2026).



Photograph 8: Photograph depicts ESCSD Collection System Segment between South Barlow Lane and Sunland Drive where ESCSD Collection System parallels Sunset Drive, facing west (Taken on 05/28/2026).



Photograph 9: Photograph depicts blooming Owens Valley Checkerbloom at nearby reference site (CNDDDB occurrence #17 of *Sidalcea covillei* #EONDx 1411), facing south. Plant represents nearest occurrence of Owens Valley Checkerbloom to the study area (Taken on 05/28/2026).



Photograph 10: Photograph depicts blooming/fruiting Inyo County star-tulip at nearby reference site (Chloe Tilton's CCH Voucher # SBBG264328 of *Calochortus excavatus* [<https://www.cch2.org/portal/collections/individual/index.php?occid=6030444>]), facing down. Plant represents nearest blooming occurrence of Inyo County star-tulip to the study area (Taken on 05/28/2026).



Photograph 11: Photograph depicts reference site for Owens Valley checkerbloom (foreground) and Inyo County star-tulip (Chloe Tilton's CCH Voucher #SBBG264996 of *Sidalcea covillei* [<https://www.cch2.org/portal/collections/individual/index.php?occid=6031116>], Chloe Tilton's CCH Voucher # SBBG264328 of *Calochortus excavatus* [<https://www.cch2.org/portal/collections/individual/index.php?occid=6030444>]), facing east (Taken on 05/27/2026).



Photograph 12: Photograph depicts reference site and typical habitat for Owens Valley checkerbloom and Inyo County star-tulip (Chloe Tilton's CCH Voucher #SBBG264996 of *Sidalcea covillei* [<https://www.cch2.org/portal/collections/individual/index.php?occid=6031116>], Chloe Tilton's CCH Voucher # SBBG264328 of *Calochortus excavatus* [<https://www.cch2.org/portal/collections/individual/index.php?occid=6030444>]) facing west (Taken on 05/27/2026).



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Attachment C

CNNDB Forms

CNDDDB Online Field Survey Form Report



California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
<https://wildlife.ca.gov/>



Source code GOR26F0007
Quad code 3611851
Occ. no. _____
EO index no. _____
Map index no. _____

This data has been reported to the CNDDDB, but may not have been evaluated by the CNDDDB staff

Scientific name: *Sidalcea covillei*

Common name: Owens Valley checkerbloom

Date of field work (mm-dd-yyyy): 05-26-2026

Comment about field work date(s):

OBSERVER INFORMATION

Observer: Douglas J. Gordon-Blackwood

Affiliation: ESA

Address: 2796 Porter Ave , Altadena, CA 91001

Email: DGordon-Blackwood@esassoc.com

Phone: (626) 823-4910

Other observers:

DETERMINATION

Personal expertise: Yes

Keyed in: Jepson eFlora

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other:

Identification explanation: Known Lubken Road Population used as reference site for focused rare plant surveys

Identification confidence: Very confident

Species found: Yes If not found, why not?

Level of survey effort: low, Visited known population as reference site for focused rare plant surveys

Total number of individuals: ~2000

Collection? No

Collection number:

Museum/Herbarium:

PLANT INFORMATION

Phenology:	10 %	70 %	20 %
	vegetative	flowering	fruiting

SITE INFORMATION

Habitat description: Moist alkali meadow surrounding and upslope of Lubken Creek with *Elymus cinereus*, *Rosa woodsii*, *Asclepias*, *Anemopsis*, *Hordeum*, *Distichlis spicata*, and *Erigeron* spp.

Slope: 5

Landowner/manager: LADWP

Aspect: east

Site condition + population viability: Excellent

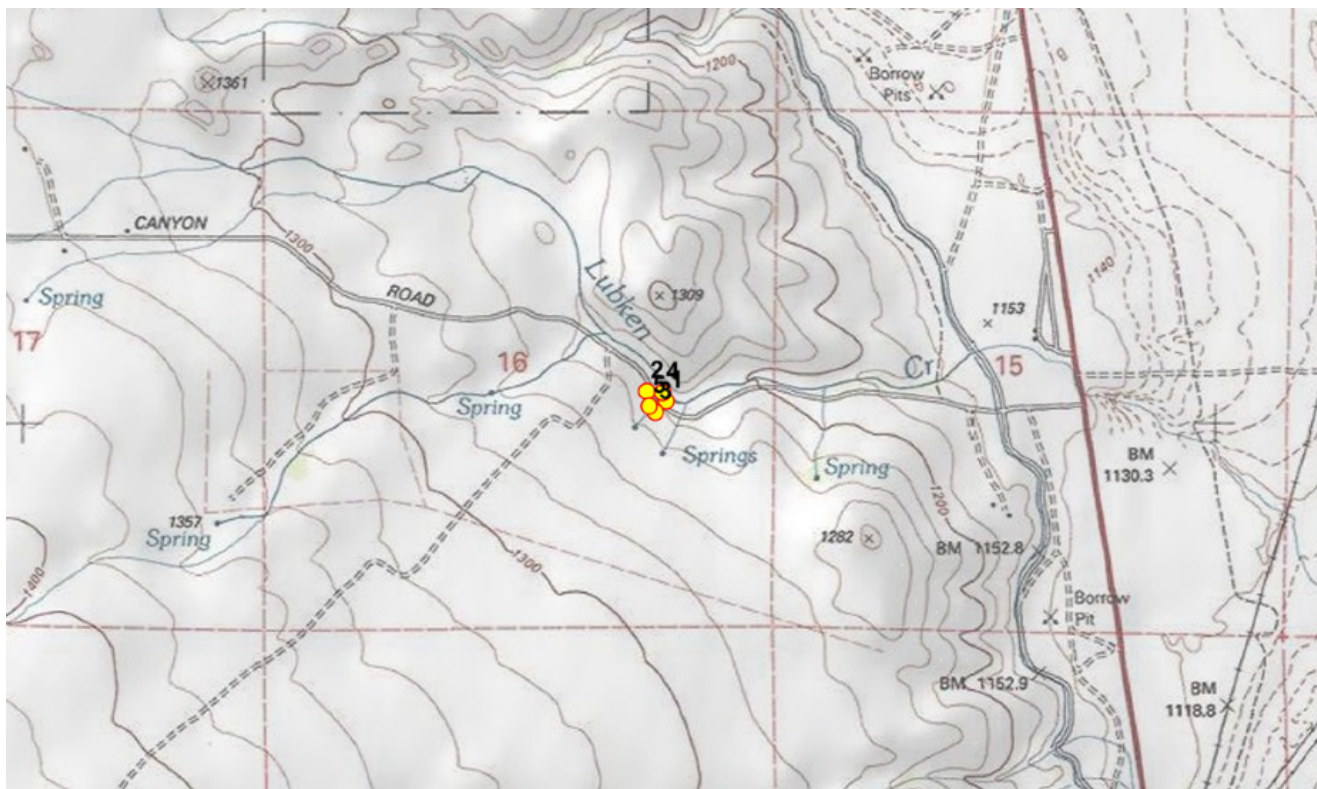
Immediate & surrounding land use: [Grazing, Road Maintenance, Recreation](#)

Visible disturbances: [minimal](#). Possible grazing and trampling but herbivory was not observed at time of observation

Threats: [grazing and trampling](#), possible road widening

General comments:

MAP INFORMATION



ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
1	Inyo	Lone Pine	3997	36.54217	-118.06164	404975	4044610	11
	Public Land Survey	Feature Comment						
	M T16S R36E 16							
ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
2	Inyo	Lone Pine	4017	36.54243	-118.06234	404912	4044639	11
	Public Land Survey	Feature Comment						
	M T16S R36E 16							
ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
3	Inyo	Lone Pine	4012	36.54185	-118.06203	404939	4044575	11
	Public Land Survey	Feature Comment						
	M T16S R36E 16							
ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
4	Inyo	Lone Pine	3996	36.54239	-118.06177	404964	4044634	11
	Public Land Survey	Feature Comment						
	M T16S R36E 16	Plants on both side of road.						

ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
	Inyo	Lone Pine	4019	36.54203	-118.06225	404920	4044595	11
5	Public Land Survey	Feature Comment						
	M T16S R36E 16							

The mapped feature is accurate within: 10 m

Source of mapped feature: [CNDDB online field survey tool](#)

Mapping notes: [Located on both sides of Lubken Canyon Road](#)

Location/directions comments: [Exit 395 at Lubken Canyon Road and head west 0.85 miles up hill until riparian vegetation is visible along roadside.](#)

Attachment(s): [20260526_132949.jpg](#), Photo of *Sidalcea colvillei* in full bloom; [20260526_132941.jpg](#), surrounding vegetation; [20260526_133422.jpg](#)

CNDDDB Online Field Survey Form Report



California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
<https://wildlife.ca.gov/>



Source code GOR26F0008
Quad code 3611851
Occ. no. _____
EO index no. _____
Map index no. _____

This data has been reported to the CNDDDB, but may not have been evaluated by the CNDDDB staff

Scientific name: *Calochortus excavatus*

Common name: *Inyo County star-tulip*

Date of field work (mm-dd-yyyy): 05-26-2026

Comment about field work date(s):

OBSERVER INFORMATION

Observer: Douglas J. Gordon-Blackwood

Affiliation: ESA

Address: 2796 Porter Ave , Altadena, CA 91001

Email: DGordon-Blackwood@esassoc.com

Phone: (626) 823-4910

Other observers:

DETERMINATION

Personal expertise: Yes

Keyed in: Jepson eFlora

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other:

Identification explanation: Known population of *Calochortus excavatus* (CNDDDB element PMLIL-D0F0 Occurrence 7)

Identification confidence: Very confident

Species found: Yes If not found, why not?

Level of survey effort: Low

Total number of individuals: 50

Collection? No

Collection number:

Museum/Herbarium:

PLANT INFORMATION

Phenology:	0 %	0 %	100 %
	vegetative	flowering	fruiting

SITE INFORMATION

Habitat description: moist alkali meadow with *Distichlis*, *Sidalcea colvillei*, *Erigeron*, *Melilotus*, *Juncus balticus*, *Anemopsis*, and *Elymus cinereus*

Slope: 15

Landowner/manager: LADWP

Aspect: East

Site condition + population viability: Excellent

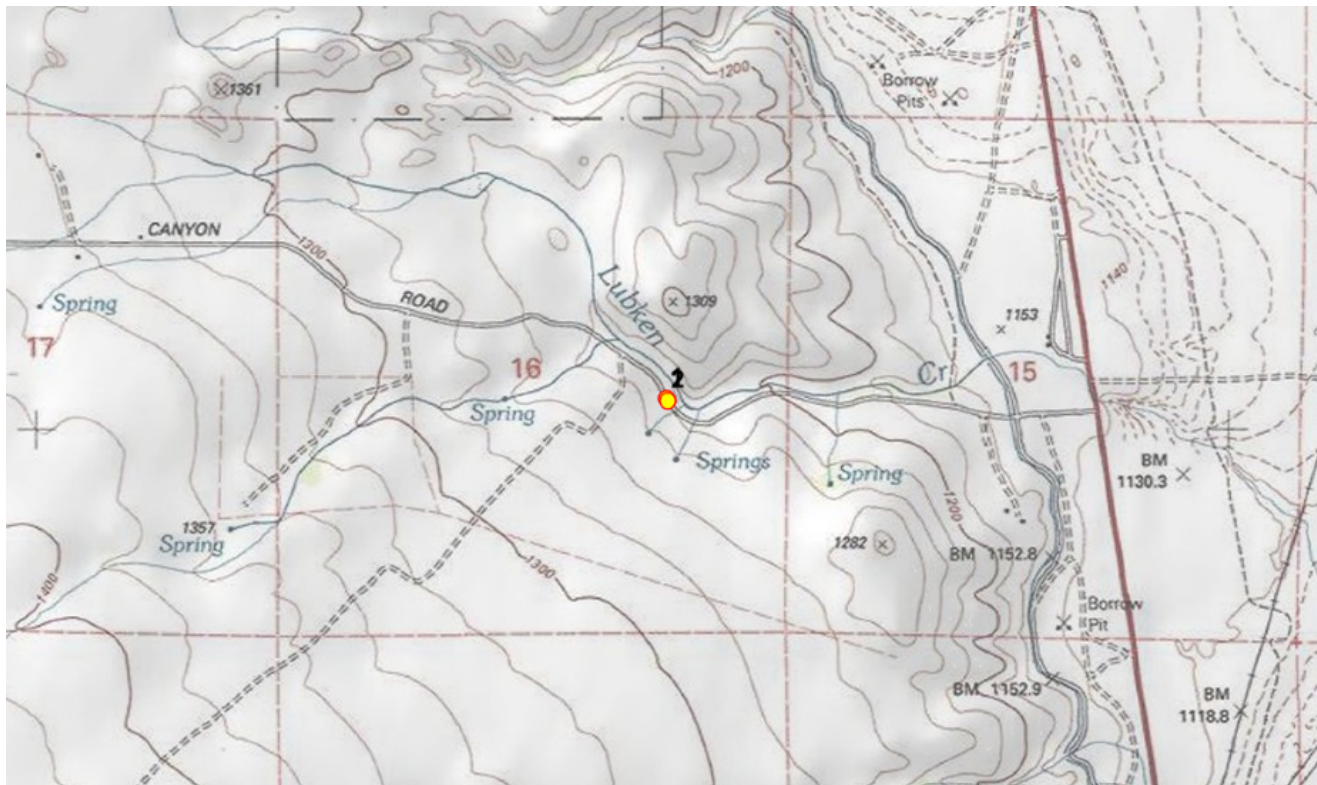
Immediate & surrounding land use: grazing, road construction/maintenance

Visible disturbances: Grazing, trampling

Threats: ROAD WIDENING WOULD THREATEN POPULATION. CATTLE GRAZING IS ALSO A THREAT.

General comments: ~50 fruiting plants observed in small polygon up slope from Lubken Road in open meadow.
Fruiting several weeks earlier than expected.

MAP INFORMATION



ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
1	Inyo	Lone Pine	4008	36.54241	-118.06212	404932	4044637	11
	Public Land Survey	Feature Comment						
	M T16S R36E 16	Along road and upslope						
ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
2	Inyo	Lone Pine	4012	36.54232	-118.06209	404934	4044627	11
	Public Land Survey	Feature Comment						
	M T16S R36E 16							

The mapped feature is accurate within: 5 m

Source of mapped feature: CNDBB Online Survey Tool

Mapping notes: (CNDBB Element PMLIL0D0F0 Occurence 10)

Location/directions comments: Take Lubken Road west from 395, approximately 0.85 miles uphill until moist alkali meadow is visible surrounding road and adjacent to Lubken Creek.

Attachment(s): 20260526_133546.jpg; 20260526_133550.jpg; 20260526_135526.jpg

CNDDDB Online Field Survey Form Report



California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
<https://wildlife.ca.gov/>



Source code GOR26F0009
Quad code 3711823
Occ. no. _____
EO index no. _____
Map index no. _____

This data has been reported to the CNDDDB, but may not have been evaluated by the CNDDDB staff

Scientific name: *Sidalcea covillei*

Common name: Owens Valley checkerbloom

Date of field work (mm-dd-yyyy): 05-27-2026

Comment about field work date(s): Reference Site Visit

OBSERVER INFORMATION

Observer: Douglas J. Gordon-Blackwood

Affiliation: ESA

Address: 2796 Porter Ave , Altadena, CA 91001

Email: DGordon-Blackwood@esassoc.com

Phone: (626) 823-4910

Other observers: Dillon Travis

DETERMINATION

Personal expertise: Yes

Keyed in: Jepson eFlora

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other:

Identification explanation: Known reference location

Identification confidence: Very confident

Species found: Yes If not found, why not?

Level of survey effort:

Total number of individuals: 1000

Collection? No

Collection number:

Museum/Herbarium:

PLANT INFORMATION

Phenology:	<u>10 %</u>	<u>50 %</u>	<u>40 %</u>
	<u>vegetative</u>	<u>flowering</u>	<u>fruiting</u>

SITE INFORMATION

Habitat description: Alkaline meadow adjacent to narrow riparian area associated with alkali sacaton, poa pratensis, elymus cinereus, rosa woodsii, and Calochortus excavatus.

Slope: 25

Landowner/manager: LADWP, BLM

Aspect: east

Site condition + population viability: Excellent

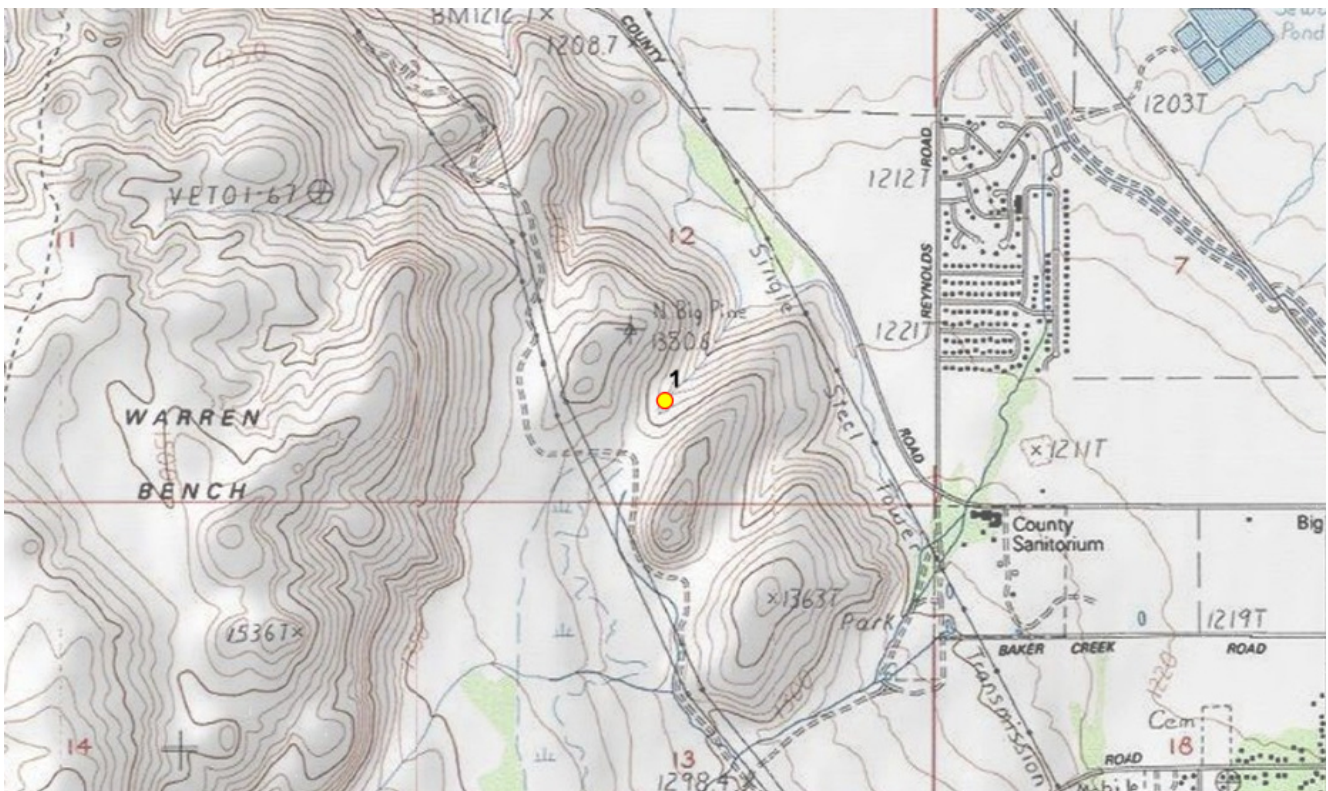
Immediate & surrounding land use: [Grazing and trampling](#), Fresh cow patties visible in polygon

Visible disturbances: [Grazing and trampling](#), but minimal herbivory observed.

Threats: [Grazing](#).

General comments: [~2000 plants observed in 2026](#).

MAP INFORMATION



ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
	Inyo	Big Pine	4227	37.17632	-118.31722	383067	4115245	11
1	Public Land Survey	Feature Comment						
	M T09S R33E 12							

The mapped feature is accurate within: 10 m

Source of mapped feature: [ArcGIS Field Maps](#) and [CNDDDB Online Field Survey Tool](#)

Mapping notes: [Small canyon with moist alkaline meadow slope above drainage](#).

Location/directions comments: [Between Baker Road and County Road in second canyon north of intersection of Reynolds Road and County Road intersection.](#)

Attachment(s): [20260527_140922.jpg](#), general habitat view; [20260527_140340.jpg](#); [IMG_6491.JPG](#); [IMG_6501.JPG](#)

CNDDDB Online Field Survey Form Report



California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
<https://wildlife.ca.gov/>



Source code GOR26F0010
Quad code 3711823
Occ. no. _____
EO index no. _____
Map index no. _____

This data has been reported to the CNDDDB, but may not have been evaluated by the CNDDDB staff

Scientific name: *Calochortus excavatus*

Common name: Inyo County star-tulip

Date of field work (mm-dd-yyyy): 05-27-2026

Comment about field work date(s):

OBSERVER INFORMATION

Observer: Douglas J. Gordon-Blackwood

Affiliation: ESA

Address: 2796 Porter Ave , Altadena, CA 91001

Email: DGordon-Blackwood@esassoc.com

Phone: (626) 823-4910

Other observers: Dillon Travis

DETERMINATION

Personal expertise: Yes

Keyed in: Jepson eFlora

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other: Known reference population

Identification explanation: Known reference site.

Identification confidence: Very confident

Species found: Yes If not found, why not?

Level of survey effort: Low

Total number of individuals: 250

Collection? No

Collection number:

Museum/Herbarium:

PLANT INFORMATION

Phenology:	0 %	97 %	3 %
	vegetative	flowering	fruiting

SITE INFORMATION

Habitat description: moist alkali meadow above a small riparian corridor surrounded by higher elevation desert species. from CNDDDB Element PMLIL0D0F0 Occurrence 76 "ALKALI MEADOW ADJACENT TO NARROW RIPARIAN AREA. ASSOCIATED WITH SPOROBOLUS AIROIDES, POA PRATENSIS, LEYMUS CINEREUS, L. TRITICOIDES, ROSA WOODSII, ERICAMERIA NAUSEOSA, CAREX, ARTEMISIA TRIDENTATA, PURSHIA TRIDENTATA, AND SIDALCEA COVILLEI."

Slope: 25

Aspect: [East](#)

Landowner/manager: [LADWP and BLM](#)

Site condition + population viability: [Excellent](#)

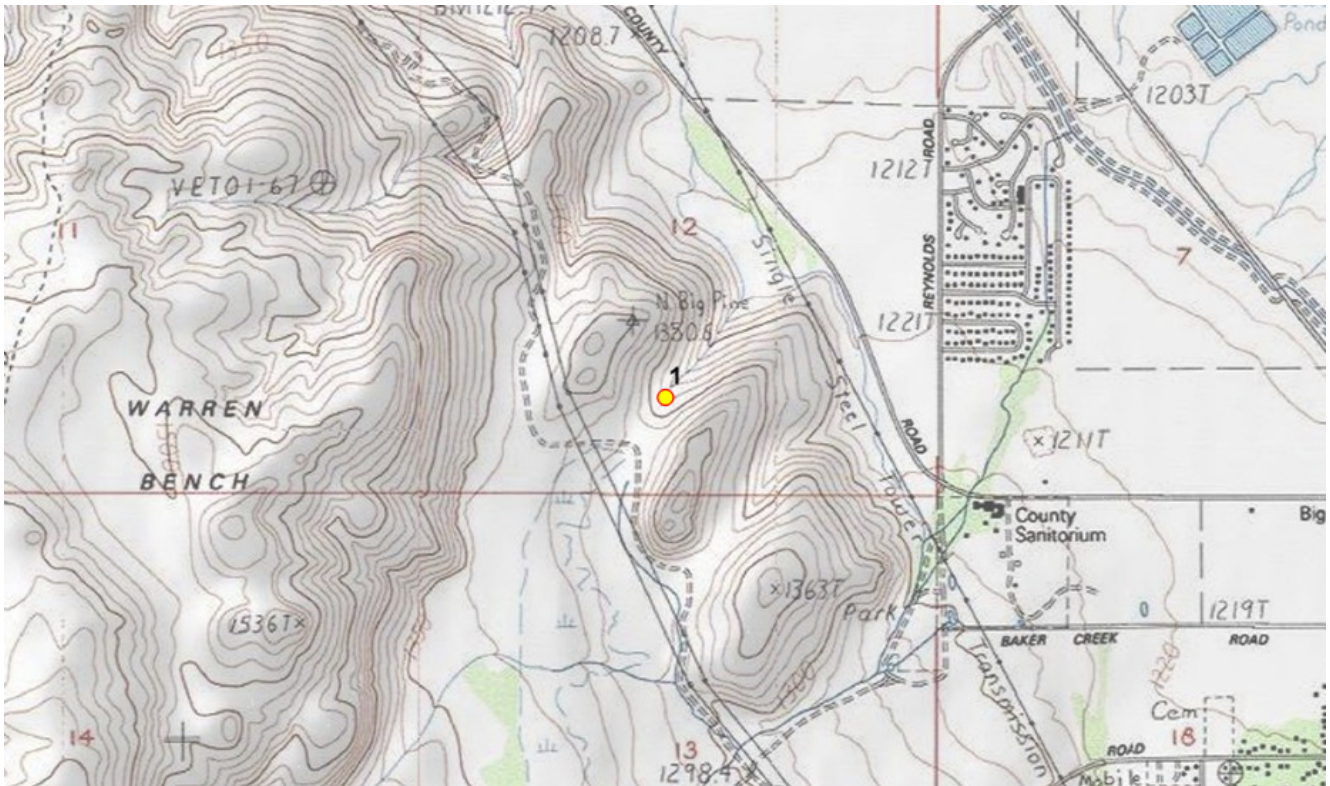
Immediate & surrounding land use: [Grazing lease](#)

Visible disturbances: [Grazing and trampling by cattle](#)

Threats: [Grazing](#), [Trampling](#)

General comments: [Approximately 250 plants here, with around 10 plants observed flowering, remainder all fruiting.](#)

MAP INFORMATION



CNDDDB Online Field Survey Form Report



California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
<https://wildlife.ca.gov/>



Source code GOR26F0011
Quad code 3711834
Occ. no. _____
EO index no. _____
Map index no. _____

This data has been reported to the CNDDDB, but may not have been evaluated by the CNDDDB staff

Scientific name: *Sidalcea covillei*

Common name: Owens Valley checkerbloom

Date of field work (mm-dd-yyyy): 05-28-2026

Comment about field work date(s):

OBSERVER INFORMATION

Observer: Douglas J. Gordon-Blackwood

Affiliation: ESA

Address: 2796 Porter Ave , Altadena, CA 91001

Email: DGordon-Blackwood@esassoc.com

Phone: (626) 823-4910

Other observers: Dillon Travis

DETERMINATION

Personal expertise: Yes

Keyed in: Jepson eFLora

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other: Previously known location, compared to plants at two other known reference locations (See GOR26F0007 and GOR26F0009)

Identification explanation: Keyed and compared to reference location populations, within known occurrence for species.

Identification confidence: Very confident

Species found: Yes If not found, why not?

Level of survey effort: CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (2018) and CNPS's Botanical Survey Guidelines (2001)

Total number of individuals: 15

Collection? No

Collection number:

Museum/Herbarium:

PLANT INFORMATION

Phenology:	10 %	70 %	20 %
	vegetative	flowering	fruiting

SITE INFORMATION

Habitat description: ALKALINE MEADOW WITH SPOROBOLUS AIROIDES, DISTICHLIS SPICATA VAR. STRICTA, EQUISTEUM SP, CHRYSOTHAMNUS NAUSEOUS, ROSA WOODSII, JUNCUS BALTICUS, CAREX DOUGLASII, IRIS MISSOURIENSIS, ELYMUS TRITICOIDES, SISYRINCHIUM HALOPHILUM, ETC.

Slope: 0

Aspect: [None](#)

Landowner/manager: [LADWP and BIA-Bishop](#)

Site condition + population viability: [Fair](#)

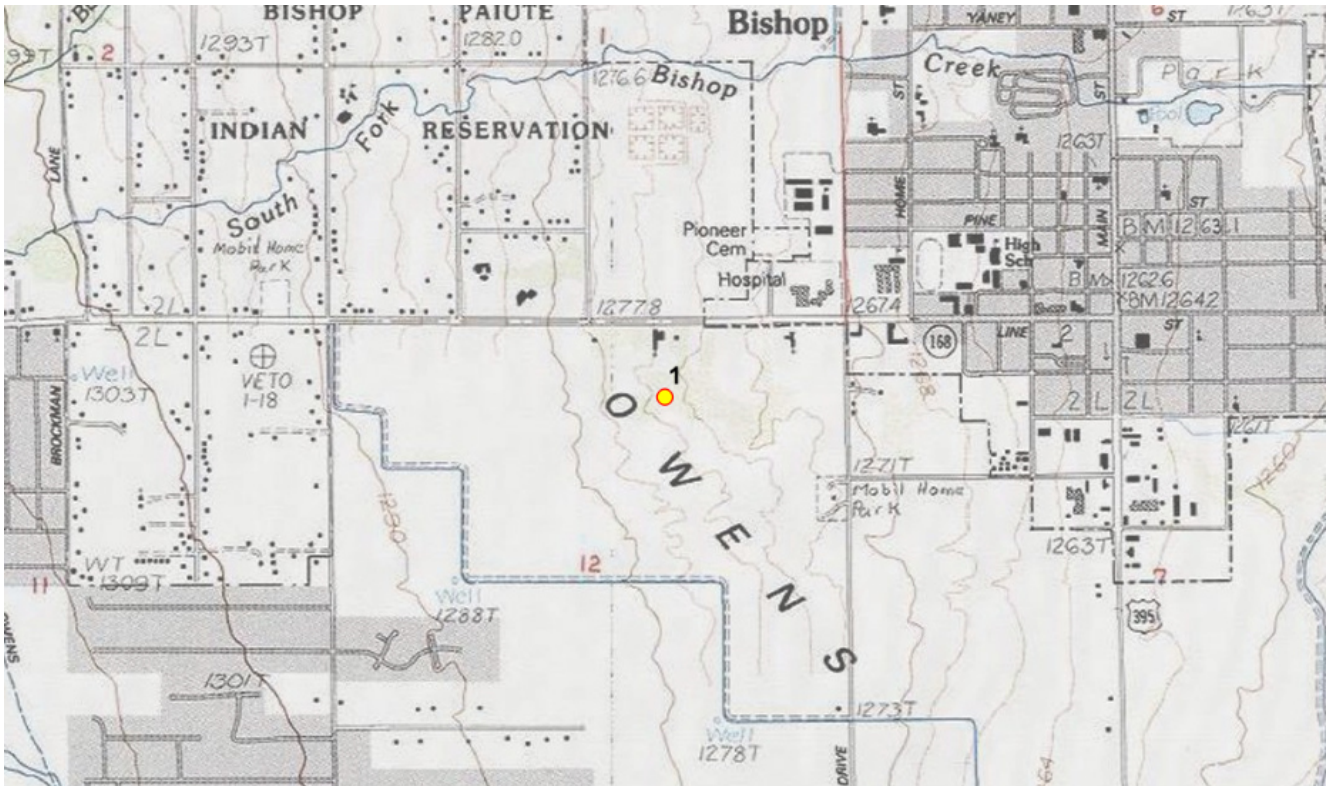
Immediate & surrounding land use: [Grazing](#)

Visible disturbances: [Grazing](#)

Threats: [Grazing](#), development, altered flood/tidal/hydrologic regime, and non native plants.

General comments: [Plants sporadic and scarce. 15 plants observed, and minor herbivory observed.](#)

MAP INFORMATION



ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
	Inyo	Bishop	4190	37.35919	-118.41159	374992	4135654	11
1	Public Land Survey	Feature Comment						
	M T07S R32E 12	Approximately 15 plants within 10 meters of point						

The mapped feature is accurate within: 10 m

Source of mapped feature: [ARCGIS Field Maps](#)

Mapping notes: ~approximately <1 meter accuracy with ArcGIS field maps and EOS GNSS Arrow Gold GPS.

Location/directions comments: [head south from 168, south of Calvary Baptist Church and Christian School in wooded alkali meadow](#)

Attachment(s): [20260528_102514.jpg](#); [20260528_103040.jpg](#)