Notice of Preparation

To: State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814
(Address)

From: Inyo County Planning Dept.
168 N. Edwards Street, P.O. Drawer L
Independence, CA 93526
(Address)

Subject: Notice of Preparation of a Draft Environmental Impact Report

Inyo County will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☒ is ☐ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Cathreen Richards, Inyo County Planning Director at the address shown above. We will need the name for a contact person in your agency.

Project Title: Crystal Geyser Roxane Grant Ranch Project

Project Applicant, if any: CG Roxane, LLC., 2705 Lexington Way, San Bernardino, CA 92407

Date January 28, 2026

Signature

Title Inyo County Planning Director

Telephone (760) 878-0447

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Inyo County Planning Department
168 North Edwards Street
P.O. Drawer L
Independence, CA 93526

Phone: (760) 878-0447
FAX: (760) 872-2712
E-Mail: inyoplanning@Inyocounty.us

NOTICE OF PREPARATION AND SCOPING MEETINGS

Project Title:	Crystal Geyser Roxane Grant Ranch Project
Project Applicant:	CG Roxane, LLC
Comment Period:	January 28, 2026, through February 27, 2026
Scoping Meetings:	Two public scoping meetings will be held at the following locations: **February 10, 2026, at 6:00-7:30 p.m.:** Olancha Fire House, 689 Shop Street, Olancha, CA 93549 **February 11, 2026, at 6:00-7:30 p.m.:** Statham Town Hall, 138 N. Jackson Street, Lone Pine, CA 93545
Lead Agency:	Inyo County
Contact:	Cathreen Richards, Planning Director Inyo County Planning Department 168 N. Edwards Street P.O. Drawer L Independence, CA 93526

PURPOSE OF THIS NOTICE OF PREPARATION

In accordance with the California Environmental Quality Act (CEQA), Inyo County (County) has prepared this Notice of Preparation (NOP) to inform responsible agencies and interested parties that an Environmental Impact Report (EIR) will be prepared for the proposed Crystal Geyser Roxane Grant Ranch Project ("project" or "proposed project"). The purpose of this NOP is to provide sufficient information about the proposed project and its potential environmental impacts to allow Responsible and Trustee Agencies, interested public agencies, organizations, and the general public the opportunity to provide a meaningful response related to the scope and contents of the EIR, including mitigation measures that should be considered and alternatives that should be addressed. In compliance with CEQA, the County will be the lead agency in preparation of the EIR.

PROJECT LOCATION AND SETTING

The approximately 14.62-acre project site is located at 4050 U.S. Highway (US) 395 in the unincorporated community of Grant at the base of the eastern Sierra Nevada Mountain Range in southern Inyo County, California. The project site is located on a portion of Assessor's Parcel Number (APN) 033-110-60 and is approximately 0.3 mile north of the intersection of US 395 and State Route (SR) 190. The proposed project is located approximately 3.2 miles south of the community of Olancha and

Independence, the County seat, is located approximately 40 miles north of the project site. Refer to Figure 1 for the regional location of the project site and Figure 2 for an aerial map of the project site (Note: all figures are included in Appendix A).

The project site is currently vacant and primarily undeveloped; however, an abandoned single-family ranch house is located in the northern portion of the project site. A dirt access road traverses the northwestern portion of the site. The project site has an Inyo County General Plan land use designation of Light Industrial (LI), Open Space (OSR), and Residential Estate (RE), and a zoning designation of Light Industrial (M-2), Open Space (OS-40), and Rural Residential (RR-5.0).

PROJECT DESCRIPTION

The project would include the construction of a water bottling facility, internal roadways, employee parking and truck staging areas, a fire suppression tank and fire pump building, and other utilities. The project also seeks Planning Department approval of Conditional Use Permit (CUP) No. 2025-01 to permit the water bottling facility on the Light Industrial (M-2) zoning district, and CUP No. 2025-05 for the water transfer pursuant to Chapter 18.77 of the Inyo County Code of Ordinances. The project would require demolition of the existing vacant ranch house on the project site that was constructed in 1985.

The water bottling facility would be an approximately 124,500-square-foot (sf) steel building that would house two bottling lines, a warehouse, and shipping facilities. The water bottling facility building would be constructed with standard industrial metal siding with a shallow-sloping roofline at a maximum height of 27 feet above grade. The building would be painted in desert-sand or similar light colors and would include non-reflective surfaces to be visually compatible with the surrounding character of the site. Refer to Figure 3 for the proposed site plan, Figure 4 for detail on the proposed water bottling facility, and Figures 5 and 6 for renderings of the proposed water bottling facility.

A new production well would be drilled approximately 1,200 feet northwest of the proposed water bottling facility, which would be used as the source for all water uses during operation. The proposed production well would be enclosed in a concrete masonry unit well house with an aboveground pump connected. A chain-link security fence with barbed wire and perimeter lighting would be installed around the proposed well house. A new six-inch high-density polyethylene (HDPE) pipe would be installed from the proposed production well to the proposed water distribution system, which would then convey water via a four-inch water supply line to the water bottling facility. The production well would primarily be used for flavored and unflavored mineral water production; however, ancillary uses of the well would include domestic/industrial water for the industrial cooling tower, fire suppression, and employee restrooms and breakrooms. Based on an anticipated 260 days of operation per calendar year, the total annual water usage would not exceed 410 acre-feet per year (AFY). The maximum daily water usage during operation would be approximately 510,000 gallons per day (gpd). The water bottling facility would operate two bottling lines with three shifts per day. The proposed project would operate year-round, an average of 260 days per year; however, it is anticipated that peak levels of operation would occur during a three-month period during the summer. During peak operations, 15 employees would be on-site per shift, for a total of 45 employees per day. During off-season operations for the remaining nine months, 12 employees would be on-site per shift, for a total of 36 employees per day.

The water bottling facility would include the packaging and loading of water bottles onto semi-trucks for shipment to distribution centers in southern California. It is anticipated that a total of 38 trucks per day would transport the packaged bottled water product off-site to the distribution centers. Approximately two trucks per day would transport packaging and bottling raw materials to the site. All employee

vehicles and distribution trucks would access the project site via a new 40-foot-wide ingress/egress driveway off SR 190. A 12-foot-wide deceleration lane would be installed along SR 190 and would connect to the driveway. The driveway and deceleration lane would be constructed in accordance with the Inyo County Public Works Department – Roads Department and the California Department of Transportation (Caltrans) requirements and would require a Caltrans Encroachment Permit.

EIR PROCESS AND SCOPE

The County has prepared an Initial Study (included as Appendix B to this NOP) and determined that the proposed project may result in a significant effect on the environment; therefore, an EIR will be prepared. Following the close of the NOP comment period, a Draft EIR will be prepared that will consider all NOP comments. In accordance with CEQA Guidelines Section 15105(a), the Draft EIR will be released for public review and comment for a required 45-day review period. Following the close of the 45-day public review period, the County will prepare a Final EIR, which will include responses to all substantive comments received on the Draft EIR. The Draft EIR and Final EIR will be considered by the County Board of Supervisors in making the decision to certify the EIR and approve or deny the project.

The EIR will evaluate the direct and indirect significant environmental impacts resulting from construction and operation of the proposed project and will propose mitigation measures to reduce or avoid impacts determined to be significant. The EIR will discuss other topics required by CEQA, including significant irreversible impacts, known controversy associated with the project, and environmental effects and issues to be resolved by decision makers. The EIR will also identify potential cumulative impacts of the proposed project in combination with the impacts of other relevant past, present, and reasonably foreseeable future projects that are in the project area. An evaluation of project alternatives that could reduce significant impacts will also be included in the EIR.

The EIR, in combination with the Initial Study prepared for the proposed project (and appended to the EIR), will address all environmental topics in accordance with Appendix G of the CEQA Guidelines as listed below. Based on the Initial Study, the County has determined that the topics **in bold** are anticipated to result in potentially significant impacts and will be included for full analysis in the EIR:

- **Aesthetics**
- Agriculture and Forestry Resources
- **Air Quality**
- **Biological Resources**
- **Cultural Resources**
- **Energy**
- **Geology and Soils**
- **Greenhouse Gas Emissions**
- Hazards and Hazardous Materials
- **Hydrology and Water Quality**
- Land Use and Planning
- Mineral Resources
- **Noise**
- Population and Housing
- Public Services
- Recreation
- **Transportation**
- **Tribal Cultural Resources**
- **Utilities and Service Systems**
- Wildfire

ALTERNATIVES

In accordance with Section 15126.6 of the CEQA Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." As required by CEQA, the EIR will evaluate a No Project Alternative. Aside from the No Project Alternative, the County has not yet determined what additional alternatives to the project will be evaluated in the EIR. These will be

identified during the environmental review process. Once selected, the alternatives will be analyzed at a qualitative level of detail in the Draft EIR for comparison against the impacts identified for the project.

SCOPING MEETINGS

Two public scoping meetings will be held at the following locations:

February 10, 2026, at 6:00-7:30 p.m.: Olancha Fire House, 689 Shop Street, Olancha, CA 93549

February 11, 2026, at 6:00-7:30 p.m.: Statham Town Hall, 138 N. Jackson Street, Lone Pine, CA 93545

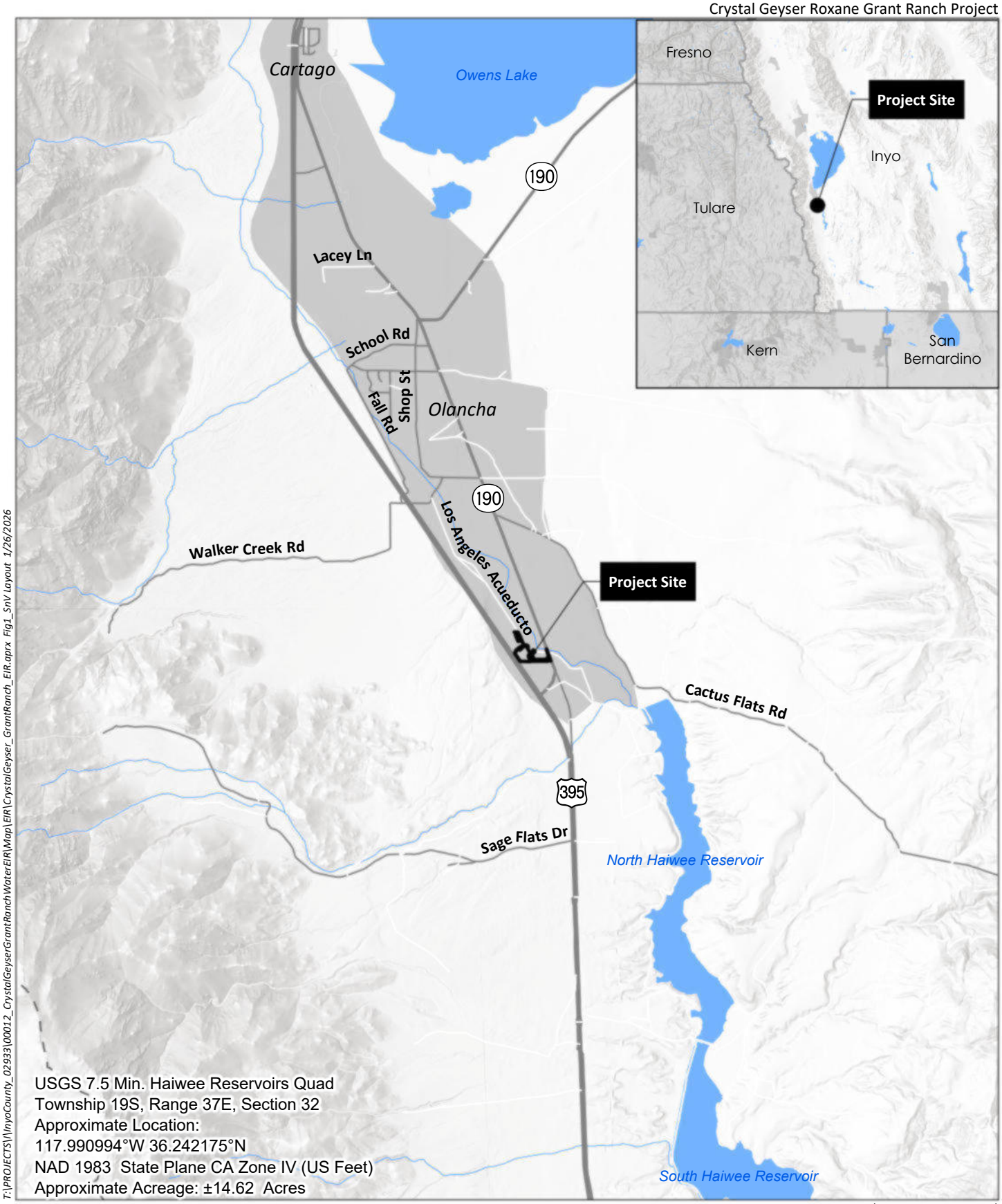
PUBLIC REVIEW PERIOD

As specified by the CEQA Guidelines, the NOP will be circulated for a 30-day review period. The public review period is from January 28, 2026, through February 27, 2026. Please send all written comments to Cathreen Richards, Inyo County at the address shown above or email to crichards@inyocounty.us with "Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report" as the subject. Public agencies providing comments are asked to include a contact person for the agency.

Comments on the NOP are due no later than the close of the 30-day review period at 5:00 p.m. on February 27, 2026.

Appendix A

Figures



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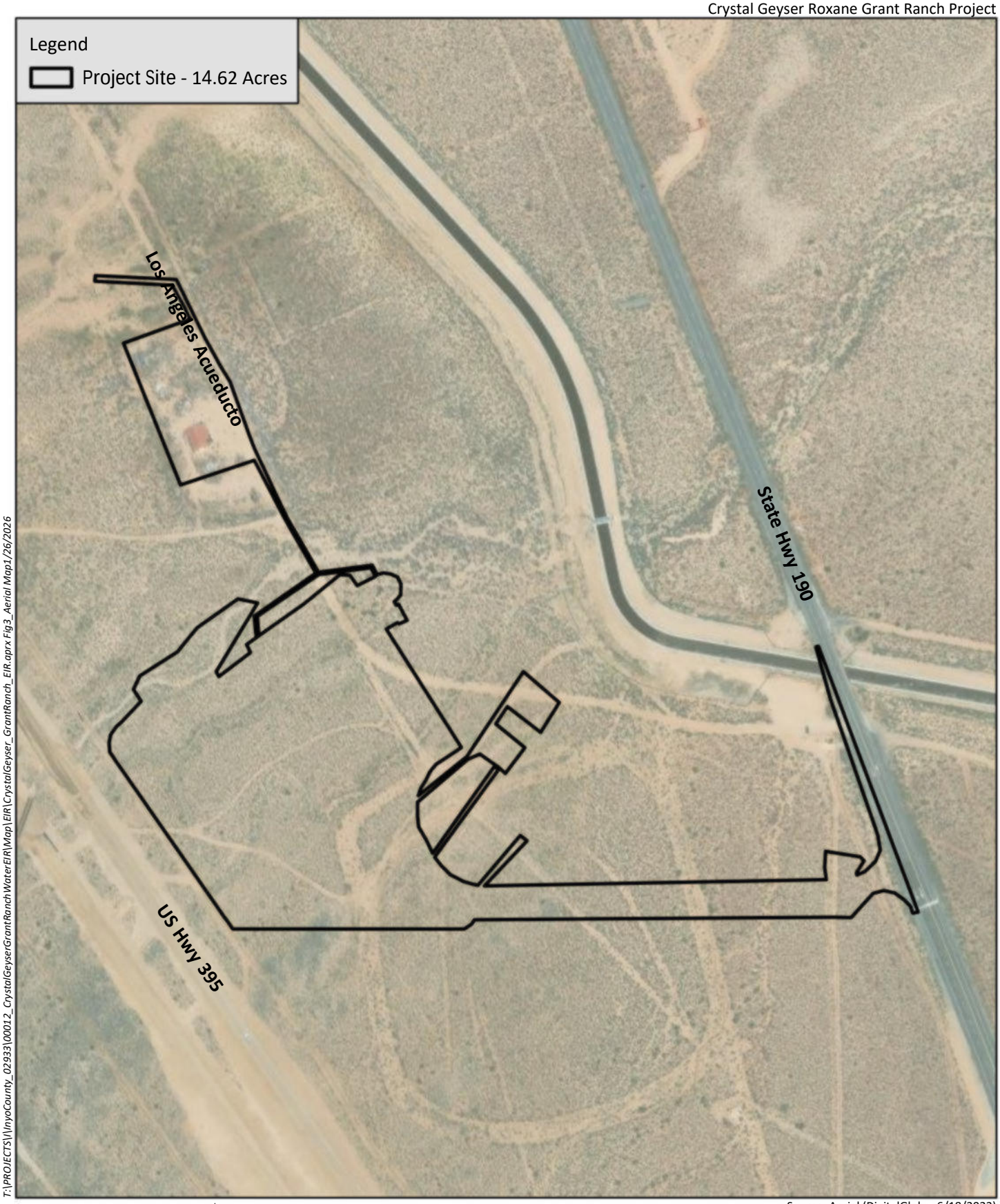
Source: Base Map Layers (Esri, USGS, NGA, NASA)

HELIX Environmental Planning

Site and Vicinity Map

Figure 1



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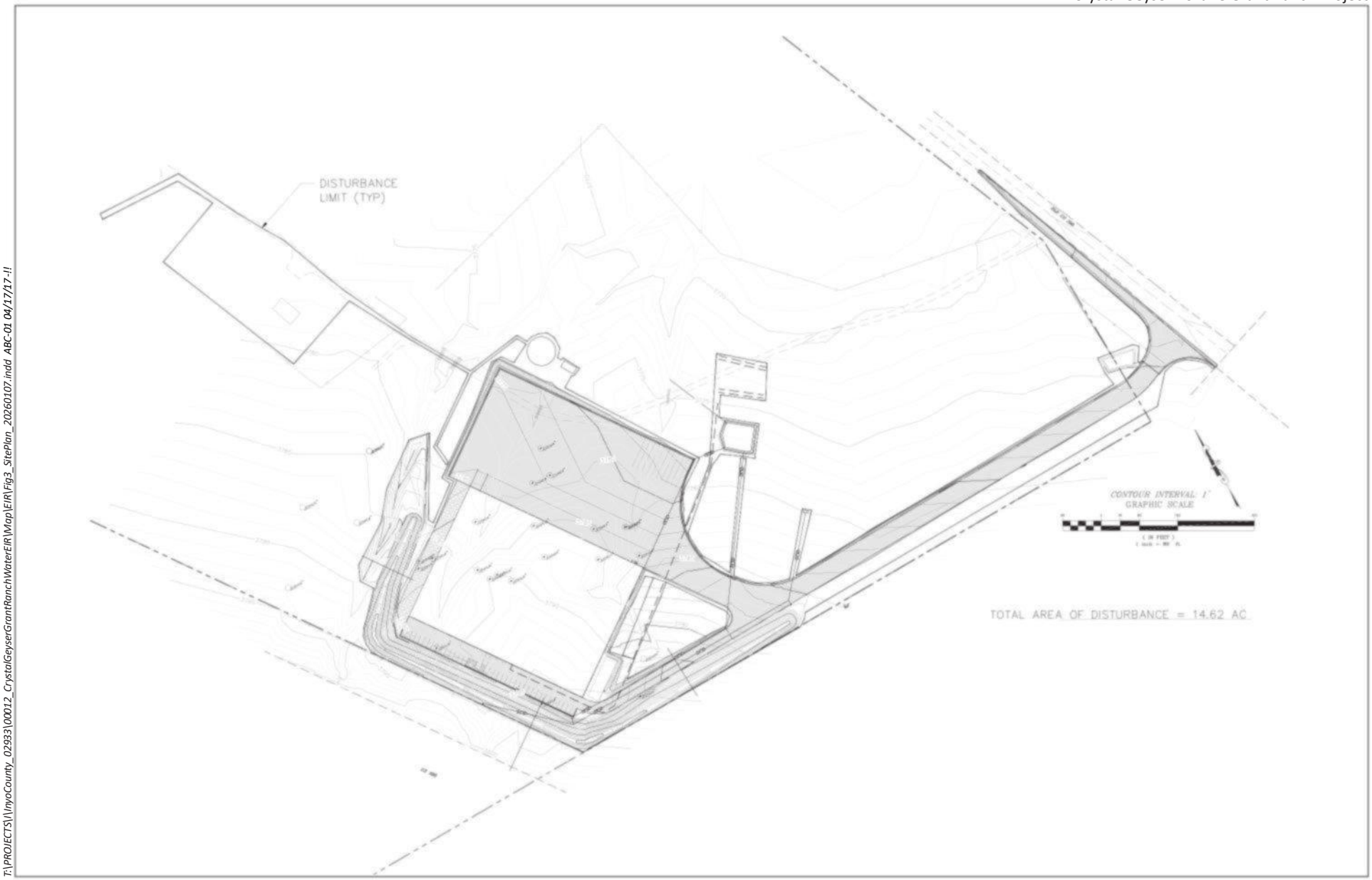
0 300 Feet

Source: Aerial (DigitalGlobe, 6/18/2023)

HELIX Environmental Planning

Aerial Map

Figure 2



Source:THA, 2026

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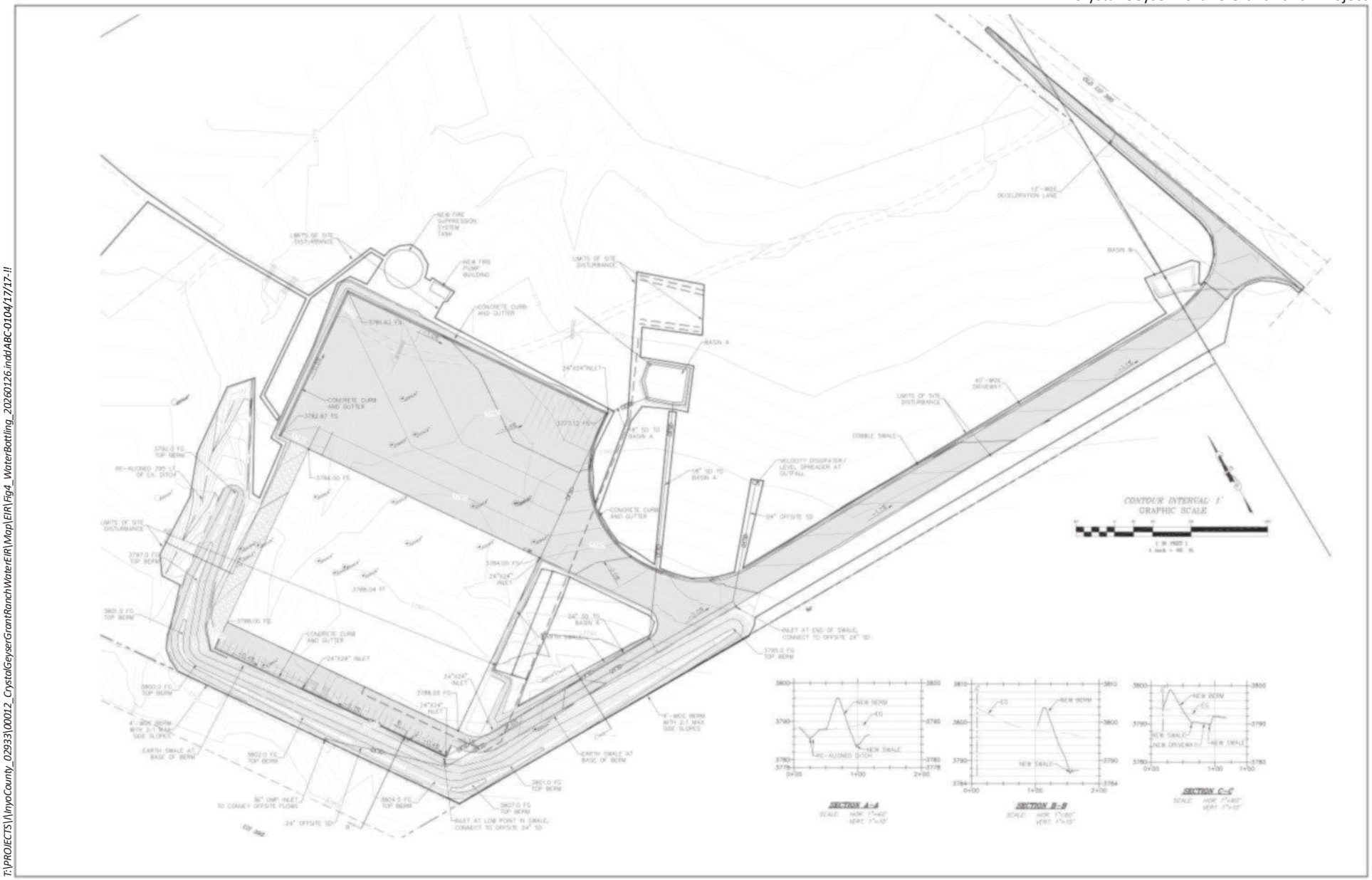
HELIX Environmental Planning

Water Bottling Facility Site Plan

Figure 3



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Source: THA, 2026

HELIX Environmental Planning

Water Bottling Facility Detail

Figure 4

Source: Crystal Geyser Roxane 2025

HELIX Environmental Planning

Northeastern Face

Figure 5

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Source: Crystal Geyser Roxane 2025

HELIX Environmental Planning

Southwestern Face

Figure 6

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Appendix B

Initial Study

HELIX Environmental Planning

Crystal Geyser Roxane Grant Ranch Project

Conditional Use Permit No. 2025-01
Initial Study

January 2026 | 02933.00012.001

Prepared by:

Inyo County Planning Department
168 N. Edwards Street
P.O. Drawer L
Independence, CA 93526

With technical support from:

HELIX Environmental Planning, Inc.
1180 Iron Point Road, Suite 130
Folsom, CA 95630

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TABLE OF CONTENTS

ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ALUCP	airport land use compatibility plan
amsl	above mean sea level
APN	Assessor's Parcel Number
AFY	acre-feet per year
BDU	San Bernadino/Inyo/Mono Unit
BLM	Bureau of Land Management
BMPs	Best Management Practices
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Fire and Forestry
Caltrans	California Department of Transportation
Cal/OSHA	California Department of Occupational Safety and Health
CBC	California Building Code
CCR	California Code Resource
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CERS	California Environmental Reporting System
CGS	California Geological Survey
CHP	California Highway Patrol
CMU	Concrete Masonry Unit
CPC	California Plumbing Code
CPUC	California Public Utilities Commission
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWC	California Water Code
DOC	California Department of Conservation
DMR	Division of Mine Reclamation
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EV	electric vehicle
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
gpd	gallons per day

ACRONYMS AND ABBREVIATIONS

HCD	California Department of Housing and Community Development
HDPE	high-density polyethylene
HMBP	hazardous materials business plan
HSC	Health and Safety Code
IGP	Industrial General Stormwater Permit
ITP	Incidental Take Permit
LADWP	Los Angeles Department of Water and Power
LRWQCB	Lahontan Regional Water Quality Control Board
LUST	Leaking Underground Storage Tank
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MLC	Mineral Land Classification
MWELO	Model Water Efficient Landscape Ordinance
NFHL	National Flood Hazard Layer
NIMS	National Incident Management System
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PRC	Public Resources Code
PV	photovoltaic
ROW	right-of-way
SEMS	Standardized Emergency Management System
SIC	Standard Industrial Classification
sf	square feet
SMARA	Surface Mining and Reclamation Act of 1975
SRA	State Responsibility Area
SR	State Route
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
USEPA	U.S. Environmental Protection Agency
VMT	vehicles miles traveled
WSA	Water Supply Assessment

INITIAL STUDY INFORMATION SHEET

1.	Project title:	Crystal Geyser Roxane Grant Ranch Project
2.	Lead agency name and address:	Inyo County
3.	Contact person and phone number:	Cathreen Richards, Planning Director 760-878-0447
4.	Project location:	4050 U.S. Highway 395, Grant, Inyo County, CA
5.	Project sponsor's name and address:	CG Roxane, LLC 2705 Lexington Way, San Bernadino, CA
6.	General plan designation:	Light Industrial (LI), Open Space (OSR), Residential Estate (RE)
7.	Zoning:	Light Industrial (M-2), Open Space (OS-40), Rural Residential (RR-5.0)

8. Description of project:

The project would include the construction of a water bottling facility, internal roadways, employee parking and truck staging areas, a fire suppression tank and fire pump building, and other utilities. The water bottling facility would be an approximately 124,500-square foot (sf) steel building that would house two water bottling lines, a warehouse, and shipping facilities. The project also seeks approval of Conditional Use Permit (CUP) No. 2025-01 to permit the water bottling facility on the Light Industrial (M-2) zoning district, and CUP No. 2025-05 for the water transfer pursuant to Chapter 18.77 of the Inyo County Code of Ordinances. A new production well would be drilled approximately 1,200 feet northwest of the proposed water bottling facility, which would be used as the source for all water uses during operation.

9. Surrounding land uses and setting:

The proposed project is located in the unincorporated community of Grant, Inyo County (County), and is located approximately 3.2 miles south of the unincorporated community of Olancha. Independence, the County seat, is located approximately 40 miles north of the project site. The project site is immediately bordered by undeveloped, vacant land and the Los Angeles Aqueduct to the north; State Route (SR) 190 to the east; undeveloped, vacant land to the south; and U.S. Highway 395 to the west. The project site is situated within a rural area of the County and is generally surrounded by undeveloped lands managed by the Bureau of Land Management (BLM). Other land uses in the project vicinity include the Olancha RV Park and Motel approximately one mile north of the project site, and agricultural fields with scattered rural residences approximately 0.6 mile northeast of the project site.

The project site is relatively flat and gently slopes from west to east, with elevations ranging from approximately 3,770 feet to 3,810 feet above mean sea level (amsl). The project site is currently vacant

and undeveloped; however, an abandoned single-family ranch house constructed in 1985 with ancillary structures and livestock pens are located in the northern portion of the project site. A dirt access road traverses the northwestern portion of the site. The project site has an Inyo County General Plan land use designation of Light Industrial (LI), Open Space (OSR), and Residential Estate (RE), and a zoning designation of Light Industrial (M-2), Open Space (OS-40), and Rural Residential (RR-5.0).

10. Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement:

    - California Department of Fish and Wildlife (CDFW)
    - California Department of Public Health (CDPH), Food and Drug Branch
    - California Department of Transportation (Caltrans), District 9
    - Lahontan Regional Water Quality Control Board (LRWQCB)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On July 25, 2025, the County sent tribal consultation letters (formerly known as Assembly Bill [AB] 52 consultation) to 19 contacts from nine California Native American Tribes that are traditionally and culturally affiliated with the project area. To date, no responses to these consultation invitations have been received by the County. Tribal Cultural Resources will be addressed in the Environmental Impact Report (EIR) that will be prepared by the County for the proposed project.

1.0 INTRODUCTION

This Initial Study addresses the proposed Crystal Geyser Roxane Grant Ranch Project ("project" or "proposed project") located in Inyo County (County), and whether it may cause significant effects on the environment. The proposed project would include the construction of a water bottling facility with two water bottling lines, a warehouse, shipping facilities, as well as internal roadways, employee parking and truck staging areas, and associated utilities. The proposed water bottling facility would include the packaging and loading of water bottles onto semi-trucks for shipment to retail locations in southern California. This Initial Study has been prepared to satisfy the requirements of the California Environmental Quality Act (CEQA; Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). CEQA requires that State and local government agencies consider the environmental consequences of projects over which they have discretionary authority before they approve or implement those projects.

The Initial Study is a public document used by the decision-making lead agency to determine whether a project may have a significant effect on the environment. In the case of the proposed project, Inyo County is the CEQA lead agency and will use the Initial Study to determine whether the proposed project would result in a significant effect on the environment. Pursuant to CEQA, the discussion of potential effects on the environment is focused on those impacts that may be significant or potentially significant. CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CCR Sections 15126.2(a) and 15128). Effects dismissed in this Initial Study, which will be appended to the Environmental Impact Report (EIR) to be prepared for the proposed project, as clearly insignificant and unlikely to occur, need not be discussed further in the EIR unless the lead agency subsequently receives information inconsistent with the finding in the Initial Study (CCR Section 15143).

The purpose of this document is to identify environmental topic areas that do not require further evaluation in the EIR that will be prepared for the proposed project because they would result in either no impact or a less than significant impact, and to focus the scope of the EIR on those environmental topic areas that may result in potentially significant impacts and therefore require detailed analysis.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND EXISTING SETTING

The approximately 14.62-acre project site is located at 4050 U.S. Highway (US) 395 in the unincorporated community of Grant at the base of the eastern Sierra Nevada Mountain Range in southern Inyo County, California. The project site is located on a portion of Assessor's Parcel Number (APN) 033-110-60 approximately 0.3 mile north of the intersection of US 395 and State Route (SR) 190. The proposed project is located approximately 3.2 miles south of the community of Olancha and Independence, the County seat, is located approximately 40 miles north of the project site. The project site is immediately bordered by undeveloped, vacant land and the Los Angeles Aqueduct to the north; SR 190 to the east; undeveloped, vacant land to the south; and US 395 to the west. Refer to Figure 1 for a site and vicinity map and Figure 2 for an aerial map of the project site (Note: all figures are located in Appendix A of this Initial Study).

The project site is relatively flat and gently slopes from west to east, with elevations ranging from approximately 3,770 feet to 3,810 feet above mean sea level (amsl). The project site is currently vacant and largely undeveloped; however, an abandoned single-family ranch house constructed in 1985 with ancillary structures and livestock pens are located in the northern portion of the site. A dirt access road traverses the northwestern portion of the site. The project site has an Inyo County General Plan land use designation of Light Industrial (LI), Open Space (OSR), and Residential Estate (RE), and a zoning designation of Light Industrial (M-2), Open Space (OS-40), and Rural Residential (RR-5.0).

The project site is situated within a rural area of the County and is generally surrounded by undeveloped lands managed by the Bureau of Land Management (BLM). Other land uses in the project vicinity include the Olancha RV Park and Motel approximately one mile north of the project site, and agricultural fields with scattered rural residences approximately 0.6 mile northeast of the project site.

2.2 PROJECT COMPONENTS

The proposed project would include the construction of a water bottling facility, a warehouse, and shipping facilities. The project would also include the construction of internal roadways, employee parking and truck staging areas, a fire suppression tank and fire pump building, and other utilities. The proposed project components are discussed in greater detail below.

Water Bottling Facility

The proposed water bottling facility would include an approximately 124,500-square foot (sf) steel building with a 425-ft second floor mezzanine. The proposed building would house two bottling lines, a warehouse, and shipping facilities, as well as office space, storage, maintenance rooms, restrooms, and employee break areas. Refer to Figure 3 for the proposed site plan and Figure 4 for detail on the proposed water bottling facility.

The proposed water bottling facility building would be constructed with standard industrial metal siding with a shallow-sloping roofline at a maximum height of 27 feet above grade. The proposed building would be painted in desert-sand or similar light colors and would include non-reflective surfaces to be visually compatible with the surrounding character of the site. Refer to Figures 5 and 6 for renderings of the proposed water bottling facility.

Access, Circulation, and Parking

All employee vehicles and distribution trucks would access the project site via a proposed 40-foot-wide ingress/egress driveway off SR 190. A 12-foot-wide deceleration lane would be installed along SR 190 and would connect to the proposed driveway. The proposed driveway and deceleration lane would be constructed in accordance with the Inyo County Public Works Department – Roads Department and the California Department of Transportation (Caltrans) requirements and would require a Caltrans Encroachment Permit.

The proposed driveway would provide internal access to the eastern and western sides of the water bottling facility. The project would include paved internal roadways, employee parking lot, and a truck staging area. The proposed employee parking lot would include a total of 36 parking stalls located immediately west of the water bottling facility. The parking lot would also include two Americans with Disabilities Act (ADA)-compliant parking spaces and one electric vehicle (EV) charging station to allow for charging of two vehicles. The truck staging area would include a six-truck loading area and a shipping area.

A 16-foot-wide fire access road comprised of aggregate base would be installed along the northern boundary of the water bottling facility to provide fire access between the employee parking lot and truck staging area.

Drainage and Utility Improvements

Stormwater

On-site surface runoff from impervious surfaces would be collected via concrete curbs, gutters, and storm drain inlets and conveyed through 18- and 24-inch storm drain pipelines. Stormwater would be primarily discharged on-site to two stormwater detention basins and an earthen swale at the base of a vegetated berm along the western boundary of the building to allow infiltration on-site. Overflow stormwater would also be discharged on-site via an outfall pipe with a velocity dissipater, which would retain sheet flow and prevent erosion.

The State Water Resources Control Board (SWRCB) requires coverage of the Industrial General Stormwater Permit (IGP) based on Standard Industrial Classification (SIC). The SIC code for the proposed bottling plant is 5149, which is defined by the Occupational Safety and Health Administration (OSHA) as “Groceries and Related Products, Not Elsewhere Classified” and includes “Bottling mineral or spring water-wholesale” in the list of specific industries in this classification. However, industries with 5149 SIC designation are not listed by the SWRCB IGP as requiring permit coverage.

Water

A new production well would be drilled approximately 1,200 feet northwest of the proposed water bottling facility, which would be used as the source for all water uses during operation. The proposed production well would be enclosed in a concrete masonry unit (CMU) well house with an aboveground pump connected. A chain-link security fence with barbed wire and perimeter lighting would be installed around the proposed well house. A new six-inch high-density polyethylene (HDPE) pipe would be installed from the proposed production well to the proposed water distribution system, which would then convey water via a four-inch water supply line to the water bottling facility.

The proposed production well would primarily be used for flavored and unflavored mineral water production; however, ancillary uses of the well would include domestic/industrial water for the industrial cooling tower, fire suppression, and employee restrooms and breakrooms. Based on an anticipated 260 days of operation per calendar year, the total annual water usage would not exceed 410 acre-feet per year (AFY). The maximum daily water usage during operation would be approximately 510,000 gallons per day (gpd). It is anticipated that peak water demand would be highest during the summer months, as approximately 55 percent of the annual water usage would occur during this three-month period.

Fire Water

A fire suppression system tank, which is anticipated to be up to 150,000 gallons in size, would be constructed adjacent to the proposed water distribution system. A fire pump building with a diesel-powered, fire suppression pump would be installed adjacent to the fire suppression system tank, which would convey water from the tank through an eight-inch fire water line to the proposed fire sprinkler system within the water bottling facility and to the four fire hydrants that would be installed on-site. The diesel tank would be approximately 200 gallons in size and would be located on a secondary containment pad adjacent to the proposed fire suppression pump.

Electricity

Electricity would be provided to the project site by the Los Angeles Department of Water and Power (LADWP) for the proposed EV charging spaces and operation of the bottling lines, air conditioning, lighting, and other appliances.

The proposed project would include the installation of a 1-megawatt or less, roof-mounted solar photovoltaic (PV) array on the proposed water bottling facility. The proposed solar array would be connected to the local power grid under a net metering program to offset usage, and would not require the construction of a battery energy storage system.

Process Wastewater

Process wastewater generated in the proposed water bottling facility during the bottling process, such as in the filtration room and the bottling room, would be collected in a series of floor drains. The proposed floor drains would be collected in a series of below grade pipes, and the process wastewater would ultimately discharge to an on-site infiltration basin, where the process wastewater would evaporate and/or infiltrate to the subsurface.

Septic Wastewater

Septic wastewater generated by the water bottling facility would be conveyed to an on-site sewage containment system. Based on the maximum 40 employees, it is anticipated that total septic wastewater generation would be approximately 1,000 gpd based on the California Plumbing Code (CPC) wastewater generation estimate of 25 gpd per employee. The proposed septic waste containment system would be pumped by a licensed septic waste hauling contractor and disposed of at the Bishop Sunland Landfill. The proposed septic waste containment system would be designed in accordance with Chapter 7.12, Onsite Wastewater Treatment Systems, of the Inyo County Code of Ordinances, which would require approval from the Inyo County Environmental Health Department prior to issuance of building permits.

Landscaping

The proposed stormwater basins and vegetated berm along the western boundary of the building would include a total of 82,619 sf of low water use, hydroseed erosion control planting. An additional 21,558 sf of trees and shrubs would be planted along the western boundary of the water bottling facility to screen views of the project site from US 395. The proposed landscaping would include a high-efficiency irrigation system to prevent overspray onto impermeable surfaces. The project would be required to prepare and submit a landscape plan to the County pursuant to the Model Water Efficient Landscape Ordinance (MWELO).

Lighting

The proposed project is anticipated to include exterior security lighting to illuminate the loading dock area, building entrances, parking lot, fire pump building, and the well house. All proposed outdoor lighting would be installed pursuant to Chapter 18.74, Outdoor Lighting, of the Inyo County Code of Ordinances, which requires outdoor light fixtures to be directed downwards to minimize light pollution. In addition, all proposed signage would be designed in accordance with Chapter 18.75, Signs, of the Inyo County Code of Ordinances, which regulates the height, size, and illumination of outdoor signage.

2.3 CONSTRUCTION

The estimated start date for project construction is anticipated to begin as early as Spring 2027. Project construction is estimated to occur for 15 months for sitework activities and building construction, with an additionally three months for production equipment installation and testing. It is anticipated that the project would not require the import or export of soils, as all soil would be balanced on-site. The existing vacant single-family ranch house on-site would be demolished and is anticipated to generate approximately 25 cubic yards (CY) of solid waste to be hauled and disposed of off-site.

2.4 OPERATION

The proposed water bottling facility would include the packaging and loading of water bottles onto semi-trucks for shipment to retail locations in southern California. It is anticipated that a total of 38 trucks per day would transport the packaged bottled water product off-site to the retail locations. Approximately two trucks per day would transport packaging and bottling raw materials to the site.

The proposed water bottling facility would operate two bottling lines with three shifts per day. The proposed project would operate year-round, an average of 260 days per year; however, it is anticipated that peak levels of operation would occur during a three-month period during the summer. It is anticipated that project operation would require approximately 13 employees on-site per shift, for a total of 40 employees per day, including management personnel.

2.5 PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) states that a project description for an EIR shall include a statement of objectives sought by the proposed project. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits. Consistent with CEQA Guidelines, the County has developed the following objectives for the proposed project:

- Meet the market demand for Crystal Geyser Roxane bottled water products through operation of a new mineral water bottling facility that utilizes a total of 410 AFY of groundwater during operation.

- Utilize groundwater from the Owens Valley Subbasin in a sustainable manner that does not negatively impact the hydrologic conditions of the underlying aquifer.

- Provide seasonal and year-round employment opportunities in local and nearby communities through operation of a water bottling facility, creating up to 40 on-site jobs.

- Promote sustainable economic development in the local and nearby communities and contribute to the County's tax base through construction and operation of a water bottling facility.

2.6 POTENTIAL PERMITS AND APPROVALS REQUIRED

The following approvals required for development of the proposed project are anticipated to include, but are not limited to, the following:

Local Agencies

- **Inyo County Planning Department:**

    - Approval of Conditional Use Permit (CUP) No. 2025-01 for permitting the water bottling facility on the Light Industrial (M-2) zoning district;

    - Approval of CUP No. 2025-05 for water transfer pursuant to Chapter 18.77 of the Inyo County Code of Ordinances;

    - Approval of landscape plans pursuant to Model Water Efficient Landscape Ordinance (MWELO);

    - Certification of the Final EIR;

    - Approval of the project;

    - Adoption of a Mitigation Monitoring and Reporting Program (MMRP);

    - Adoption of the CEQA Findings of Fact.

- **Inyo County Public Works Department, Building and Safety Department:** Issuance of building, demolition, and grading permits.

- **Inyo County Environmental Health Services Department:**

    - Approval of the septic containment system and any improvements;

    - Issuance of a well-drilling permit for the proposed well.

- **Inyo County Water Commission:** Recommendation from the Commission for the transfer of water outside of the Owens Valley Groundwater Basin in Inyo County.

State Agencies

- **California Department of Fish and Wildlife:** Issuance of an Incidental Take Permit (ITP).
- **California Department of Transportation, District 9:** Approval of an Encroachment Permit for construction within SR 190 right-of-way.
- **California Department of Public Health, Food and Drug Branch:** Issuance of a Water Bottling Plant License and Private Water Source Operator License.
- **Regional Water Quality Control Board, Lahontan Region:** National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit, and approval of Stormwater Pollution Prevention Program (SWPPP). Approval and issuance of permits for stormwater detention basins.

3.0 ENVIRONMENTAL TOPIC AREAS POTENTIALLY AFFECTED

The environmental topic areas checked below would be potentially affected by implementation of the proposed project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist in Section 5.I through 5.XXI of this Initial Study.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology and Soils	☒ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☒ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☒ Transportation	☒ Tribal Cultural Resources
☒ Utilities and Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

4.0 DETERMINATION

Based on substantial evidence and as documented in the analyses contained in Section 5.I through 5.XXI of this Initial Study, the proposed project may result in several potentially significant impacts on the environment, and an EIR is required. Therefore, the scope of the EIR will focus on the environmental topic areas that may result in potentially significant impacts and, therefore, require detailed analysis.

On the basis of this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☒	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect I) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

1/26/26
Date

Cathreen Richards
Printed Name

Planning Director
Title

5.0 ENVIRONMENTAL INITIAL STUDY CHECKLIST

Inyo County, as the CEQA lead agency, has defined the column headings in the environmental checklist as follows:

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

C. "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

The explanation of each issue identifies the significance criteria or threshold used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (CEQA Guidelines Section 15063(c)(3)(D)). Where appropriate, the discussion identifies the following:

a) Earlier Analyses Used. Identifies where earlier analyses are available for review.

b) Impacts Adequately Addressed. Identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Incorporated," describes the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

I. AESTHETICS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a)	Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☒	☐	☐	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

Evaluation

a) Have a substantial adverse effect on a scenic vista?

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to aesthetics for questions a) through d). Therefore, these topics will be further evaluated in the EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non- forest use?	☐	☐	☒	☐

Evaluation

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) prepares, updates, and maintains Important Farmland Series Maps as pursuant to Section 65560(f) of the Government Code, and prepares and maintains an automated map and data base system to record and report changes in the use of agricultural lands every two years. However, the FMMP does not contain data for Inyo County (DOC 2025a; DOC 2025b). As such, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) has been mapped within the County. In addition, the project site has not been historically used for agricultural production. Therefore, the proposed project would not convert Farmland, as shown on the maps prepared pursuant to the FMMP, to non-agricultural use. No impact would occur, and this topic does not require further evaluation in the EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site has a General Plan land use designation of Light Industrial (LI), Open Space (OSR), and Residential Estate (RE), and a zoning designation of Light Industrial (M-2), Open Space (OS-40), and Rural Residential (RR-5.0). The proposed project site is not under a Williamson Act contract, nor has the project site historically been used for agricultural production. Therefore, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur, and this topic does not require further evaluation in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site has a General Plan land use designation of Light Industrial (LI), Open Space (OSR), and Residential Estate (RE), and a zoning designation of Light Industrial (M-2), Open Space (OS-40), and Rural Residential (RR-5.0). The project site does not contain forest land. Therefore, the proposed project would not conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production, and would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur for questions c) and d), and these topics do not require further evaluation in the EIR.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Less Than Significant Impact. As demonstrated above in the response to questions a) through d), the proposed project would result in no impact related to agriculture and forestry resources. Implementation of the proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. Therefore, the impact would be less than significant, and this topic does not require further evaluation in the EIR.

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

Evaluation

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?

c) Expose sensitive receptors to substantial pollutant concentrations?

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to air quality for questions a) through d). Therefore, these topics will be further evaluated in the EIR.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☒	☐	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

Evaluation

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to biological resources for questions a) through f). Therefore, these topics will be further evaluated in the EIR.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☒	☐	☐	☐

Evaluation

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to cultural resources for questions a) through c). Therefore, these topics will be further evaluated in the EIR.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

Evaluation

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to energy for questions a) and b). Therefore, these topics will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☒	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☒	☐	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Evaluation

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act (1972) and the Seismic Hazards Mapping Act (1990) requires the State Geologist to delineate regulatory zones of required investigation to reduce the potential for structural damage to occur resulting from surface rupture of an active fault. An active fault is defined as a fault that has ruptured within the last 11,000 years. In addition, the Seismic Hazards Act addresses other earthquake hazards, including liquefaction, landslides, ground shaking, and inundation by tsunami or seiche. The DOC's California Geologic Survey maintains the Earthquake Zones of Required Investigation Zone Application (EQ Zapp), which provides information regarding mapped faults and earthquake hazard zones (DOC 2025c).

There are no active faults that traverse the project site. The nearest active faults to the project site are located approximately 4.25 miles north of the project site and are associated with the southern extent of the Owens Valley Fault Zone (DOC 2025c). Therefore, impacts related to the potential for surface rupture to occur are not anticipated. As with all new development in California, the proposed project would be required to be designed and constructed in accordance with current California Building Code (CBC) regulations as they pertain to earthquake hazards. In addition, the project would be required to adhere to Chapter 14.08, Building Regulations, of the Inyo County Code of Ordinances, which adopts and amends, as necessary, the most recent version of the CBC. Therefore, the proposed project would not cause substantial adverse effects related to rupture of a known earthquake fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map or strong seismic ground shaking. The impact would be less than significant for questions a.i) and a.ii), and these topics do not require further evaluation in the EIR.

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

Potentially Significant Impact. As mentioned above, the Seismic Hazards Act addresses other earthquake hazards, including liquefaction and landslides. The EQ Zapp maps areas in California that have been evaluated for either soil liquefaction or landslide potential. The proposed project site is located within an unevaluated zone, which indicates that the site and surrounding area have not been evaluated for either soil liquefaction or landslides (DOC 2025c). Therefore, as the project site has not been evaluated, implementation of the proposed project may result in potentially significant impacts related to liquefaction and landslides for questions a.iii) and a.iv). These topics will be further evaluated in the EIR.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the proposed project would require grading and vegetation removal, excavation, laying foundations, and utility installation, which would disturb up to 14.62 acres. Ground disturbing activities would have the potential to temporarily expose soils to increased erosion. However, as the project site is greater than one acre in size, the proposed project would be required to adhere to the National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit requirements, including preparation of a site-specific Stormwater Pollution Prevention Program (SWPPP), which would be required to be reviewed and approved by the Lahontan Regional Water Quality Control Board (LRWQCB) prior to the start of construction. The site-specific SWPPP would include, but would not be limited to, incorporating Best Management Practices (BMPs) to prevent erosion and degradation of water quality during construction activities.

Following construction, the SWPPP would require implementation of permanent erosion control measures to control discharges and prevent erosion and sedimentation. The proposed stormwater system would collect surface runoff via concrete curbs, gutters, and storm drain inlets, which would be conveyed through 18- and 24-inch storm drain pipelines. Stormwater would be primarily discharged on-site to two stormwater basins and an earthen swale at the base of a vegetated berm along the western edge of the building to allow infiltration on-site. Overflow stormwater would also be discharged on-site via an outfall pipe with a velocity dissipater. The proposed stormwater basins and vegetated berm along the western edge of the building would include a total of 82,619 sf of low water use, hydroseed erosion control planting, which would prevent erosion of disturbed areas. Therefore, implementation of the proposed project would not result in substantial soil erosion or the loss of topsoil. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Potentially Significant Impact. The proposed project may be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. In addition, the project site may contain expansive soils or have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed project may result in potentially significant impacts for questions c) through e), and these topics will be further evaluated in the EIR.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The proposed project may result in potentially significant impacts related to paleontological resources or unique geologic features. Therefore, this topic will be further evaluated in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Evaluation

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to greenhouse gas emissions for questions a) and b). Therefore, these topics will be further evaluated in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Evaluation

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. During construction, limited amounts of hazardous materials such as fuels, solvents, and lubricating liquids required for construction vehicles and equipment would be transported and used on the project site. However, construction activities would be short-term and temporary, and the use of these materials would cease following the completion of construction. In addition, these types of materials are commonly used during construction and are not acutely hazardous, and the use

and transport of such materials would be required to be stored, handled, and disposed of in accordance with numerous local, State, and federal regulations. These regulations are administered by the County Environmental Health Services Department, the California Department of Toxic Substances Control (DTSC), the California Department of Occupational Safety and Health (Cal/OSHA), the U.S. Environmental Protection Agency (USEPA), and the federal Occupational Safety and Health Administration (OSHA). Through adherence with these existing regulations, the temporary transport, use, and disposal of hazardous materials during construction would not create a significant hazard to the public or environment and would not result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Similar to other water bottling facilities, operation of the proposed project would not require the routine transport, use, or disposal of large quantities of hazardous materials, because bottled water would be the primary product transported from the site. The limited use of hazardous materials on-site during operation are anticipated to include commercial cleaners, paints, oils, and lubricants. These materials would be transported to the site, stored within the water bottling facility, and use in accordance with manufacturers' instructions and the local, State, and federal regulations discussed in the previous paragraph. In addition, a 200-gallon diesel-powered fire suppression pump would be installed to power the proposed fire suppression system. The California Unified Program, which is overseen by the California Environmental Protection Agency (CalEPA), consolidates and streamlines the regulation of hazardous materials and waste management in California. The County Environmental Health Services Department is the County's designated Certified Unified Program Agency (CUPA) and implements the County Hazardous Materials Program. The CUPA requires that, if the project would use or store hazardous materials in quantities at or exceeding 55 gallons, 500 pounds, or 200 cubic feet annually, the project would be required to submit a hazardous materials business plan (HMBP) to the California Environmental Reporting System (CERS) prior to the start of operation. The CUPA also requires that the project develop an emergency response plan in the event of an accidental release of hazardous materials. Through adherence with these existing regulations, the proposed water bottling facility would not create a significant hazard to the public or environment and would not result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, the impact would be less than significant for questions a) and b), and these topics do not require further evaluation in the EIR.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest schools to the project site are Lo-Inyo Elementary School and Lone Pine High School, both located in Lone Pine approximately 25 miles to the north. There are no existing or planned schools within 0.25 mile of the project site. Therefore, no impact would occur, and this topic does not require further evaluation in the EIR.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Section 65962.5(a)(1) of the Government Code requires DTSC to compile and submit to the Secretary for Environmental Protection a list of all sites

listed pursuant to Section 25356 of the Health and Safety Code (HSC). According to the DTSC's EnviroStor Database, there are no hazardous waste sites on the project site. The nearest hazardous materials sites to the proposed project site include two Historical sites and one Military Evaluation site, all located approximately 3.2 miles north of the project site in Olancha (DTSC 2025).

The State Water Resources Control Board (SWRCB) maintains the GeoTracker Database, which was developed pursuant to AB 592 and SB 1189. GeoTracker is used by the SWRCB, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. There are no sites mapped by GeoTracker on the project site. The nearest open site is a Leaking Underground Storage Tank (LUST) Cleanup Site, located approximately 1.9 miles south of the project site (SWRCB 2025).

Therefore, as the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, implementation of the proposed would not, as a result, create a significant hazard to the public or the environment. No impact would occur, and this topic does not require further evaluation in the EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest airport to the project site is the Tunnel Meadow Airport in Tulare County, approximately 18 miles northwest of the project site; however, this airport was a private, unpaved airstrip with no associated aircraft facilities that has been abandoned. The Lone Pine Airport is located approximately 25 miles north of the project site and is a public airport; however, no airport land use compatibility plan (ALUCP) has been adopted for this airport. Therefore, as the proposed project is not within the vicinity of a private airstrip or an ALUCP, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impact would occur, and this topic does not require further evaluation in the EIR.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Inyo County and City of Bishop Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) identifies evacuation routes in the County in the event of an emergency. US 395, which traverses the County north-south between Mono County and San Bernadino County, is identified as the primary evacuation for communities within the Owens Valley, including Grant. Other emergency evacuation routes in the County include SR 127, SR 168, SR 178, SR 136, and SR 190 (County 2017).

The Inyo County 2016 Emergency Operations Plan (EOP) establishes the necessary emergency management organization and assigns functions and tasks consistent with California's Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS). The EOP outlines how Inyo County will prepare for and respond to incidents using the SEMS (County 2016).

The proposed project would construct a new 40-foot-wide driveway off of SR 190 to the east. A 12-foot-wide deceleration lane would be installed along SR 190 to connect with the proposed driveway and would be constructed in accordance with Inyo County Public Works Department and Caltrans standards.

A 16-foot-wide fire access road would be installed along the northern edge of the water bottling facility to provide internal fire access between the parking lot and truck staging area. In the event of an emergency in the project vicinity, the US 395 and SR 190 would serve as evacuation routes. All construction and staging would take place within the project site and access to the project site would be maintained at all times during construction. In addition, the proposed project would be required to comply with all adopted emergency response and evacuation plans, including the MJHMP and EOP. Therefore, implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

However, the proposed project's potential impacts related to emergency access to the project site, and within the vicinity of the project site, will be evaluated in question d) of Section 5.XVII, Transportation. As noted in that section, potentially significant impacts related to emergency access will be further evaluated in the EIR.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. As discussed in Section 5.XX, Wildfire, PRC Section 4201-4204 requires the California Department of Forestry and Fire Protection (CAL FIRE) to map lands within State Responsibility Areas (SRA), known as Fire Hazard Severity Zone (FHSZ) maps. FHSZ maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. There are three levels of hazard in the SRA: Moderate, High, and Very High. The project site is within an SRA and is mapped as a High FHSZ (CAL FIRE 2025).

The project site does not contain significant slopes that could exacerbate wildfire risks, and implementation of the proposed project would not alter existing prevailing winds. The proposed project would be required to adhere to existing regulations and requirements related to fire safety, including maintaining defensible space and setbacks. CAL FIRE requires that the project comply with PRC Section 4291, which requires property owners to maintain clearance of flammable vegetation within 100 feet of structures in order to reduce the risk of fire. Similarly, the project would be required to adhere to Section 14.08.140 of the Inyo County Code, which stipulates that all properties in unincorporated areas in the County shall be maintained in accordance with the defensible space requirements of PRC Section 4291. The proposed parking lot, truck staging area, and 16-foot-wide fire access road would serve to create a defensible fire zone around the perimeter of the proposed water bottling facility in the event of a wildfire.

The project would also be required to comply with the CBC Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, which prescribes building materials and construction methods for new buildings in any FHSZ or Wildland-Urban Interface Fire Area. The proposed water bottling facility would be constructed with metal sidings and roofing that would be fire resistant, and all electrical infrastructure would be required to be constructed and maintained in accordance with CBC and California Public Utilities Commission (CPUC) utility design and fire safety regulations. The proposed project would construct an on-site fire suppression system tank, fire sprinkler system within the water bottling facility, and four fire hydrants installed around the perimeter of the building per CAL FIRE requirements. Therefore, through project design and adherence to existing regulations pertaining to

wildfire prevention, implementation of the proposed project would not substantially increase fire risk or the risk of uncontrolled spread of a wildland fire, and would not expose people or structures to a significant risk of loss, injury or death. the impact would be less than significant, and this topic does not require further evaluation in the EIR.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	☒	☐	☐	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	☒	☐	☐	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

Evaluation

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Potentially Significant Impact. The proposed project would include the construction of a new water bottling facility on a largely undeveloped site. A new production well would be drilled approximately 1,200 feet northwest of the proposed water bottling facility, which would be used as the source for all water uses at the proposed water bottling facility. The proposed production well would be enclosed in a

CMU well house with an aboveground pump connected. The production well would primarily be used for flavored and unflavored mineral water production; however, ancillary uses of the well would include domestic/industrial water for the industrial cooling tower, fire suppression, landscape irrigation, and employee restrooms and breakrooms. Based on an anticipated 260 days of operation per calendar year, the total annual water usage would not exceed 410 AFY. The maximum daily water usage during operation would be approximately 510,000 gpd. It is anticipated that peak water demand would be highest during the summer months, as approximately 55 percent of the annual water usage would occur during this three-month period. Implementation of the proposed project may degrade ground water quality and may result in a substantial decrease in groundwater supplies. Therefore, a potentially significant impact may occur for questions a) and b), and these topics will be further evaluated in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. Result in substantial erosion or siltation on- or off-site?

   ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?

   iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

Potentially Significant Impact. The addition of impervious surfaces on the project site may alter the existing drainage pattern of the site, which may result in potentially significant impacts related to questions c.i) through c.ii). Therefore, these topics will be further evaluated in the EIR.

   iv. Impede or redirect flood flows?

Less Than Significant Impact. Although implementation of the proposed project would result in the addition of impervious surfaces as noted above, as discussed in greater detail in the response to question d) below, the proposed project is not located within a flood hazard zone. Therefore, implementation of the proposed project would not substantially impede or redirect flood flows. The impact would be less than significant for question c.iv), and this topic does not require further evaluation in the EIR.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) provides flood hazard data to the National Flood Hazard Layer (NFHL) in support of the National Flood Insurance Program. According to FEMA's NFHL Viewer, the project site is located within Flood Insurance Rate Map (FIRM) 06027C3350D, effective August 16, 2011. The project site is mapped as Flood Zone X, which is an area of minimal flooding. The proposed project is located over 200 miles east of the Pacific Ocean, and is not near large water bodies were seiche is known to occur. Therefore, as the proposed project is not located within a flood hazard, tsunami, or seiche zone, the potential for flooding to occur is very low. As

such, the project would not risk release of pollutants due to project inundation, and the impact would be less than significant. This topic does not require further evaluation in the EIR.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potentially Significant Impact. As discussed in the response to question a) above, implementation of the proposed project may degrade ground water quality and may result in a substantial decrease in groundwater supplies. Therefore, the proposed project may conflict with or obstruct implementation of a sustainable groundwater management plant. Therefore, a potentially significant impact may occur for question e), and this topic will be further evaluated in the EIR.

XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Evaluation

a) Physically divide an established community?

No Impact. The proposed project is located in a rural area of the County within the unincorporated community of Grant. The proposed project would construct a new water bottling facility that would be accessed by a new driveway off of SR 190; however, as the project site is situated between US 395 and SR 190 and is generally surrounded by undeveloped BLM land, the project would not physically divide an established community. Therefore, no impact would occur, and this topic does not require further evaluation in the EIR.

b) Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The project site has a General Plan land use designation of Light Industrial (LI), Open Space (OSR), and Residential Estate (RE), and a zoning designation of Light Industrial (M-2), Open Space (OS-40), and Rural Residential (RR-5.0).

The Light Industrial (LI) land use designation provides for industrial parks, warehousing, light manufacturing, public and quasi-public uses, and similar and compatible uses. The Light Industrial (M-2) zoning district allows for light, less intense, small scale manufacturing activities which normally take place within structures. Limited amount of outdoor storage or activities are acceptable, provided they are clearly accessory and incidental to the main use. As part of the project entitlements, the proposed project required approval of CUP No. 2025-01 for permitting the bottling plant on the Light Industrial (M-2) zoning district.

The proposed project would be a permitted use on the Light Industrial (LI) General Plan land use designation and the Light Industrial (M-2) zoning district with acquisition of a CUP. Prior to the issuance of the required CUP, building, and grading permits by Inyo County, the proposed project would be required to demonstrate compliance with applicable regulations, policies, and ordinances. Therefore, the proposed project would not cause significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Evaluation

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. Chapter 8.4, Mineral and Energy Resources, of the County General Plan notes that mineral resources in the County primarily include common minerals such as sand, gravel, clay, borates, and perlite; however, other valuable minerals such as silver and gold are also mined (County 2001).

The DOC's California Geological Survey (CGS) prepares Mineral Land Classification (MLC) studies under the direction of the State Geologist, as required by the Surface Mining and Reclamation Act (SMARA) of 1975 (PRC Section 2710, *et seq.*). According to the CGS's MLC Portal, there are three MLC studies that cover a portion of Inyo County. However, the proposed project site is not located within an MLC study (DOC 2025d). There are no known mineral resources on the project site that would be of value to the region or residents of the State. The DOC's Division of Mine Reclamation (DMR) maintains the Mines Online Database, which provides mine specific information and access to mine documents submitted to the DMR pursuant to PRC Section 2774.2.5. According to the Mines Online Database, there are no mineral resource recovery sites located on the project site; the nearest mine to the site is located approximately 3.25 miles to the west (DOC 2025e). Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur for questions a) and b), and these topics do not require further evaluation in the EIR.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Evaluation

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

b) Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Implementation of the proposed project may result in potentially significant impacts related to noise for questions a) and b). Therefore, these topics will be further evaluated in the EIR.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest airport to the project site is the Tunnel Meadow Airport in Tulare County, approximately 18 miles northwest of the project site; however, this airport was a private, unpaved airstrip with no associated aircraft facilities that has been abandoned. The Lone Pine Airport is located approximately 25 miles north of the project site and is a public airport; however, no ALUCP has been adopted for this airport. Therefore, as the proposed project is not within the vicinity of a private airstrip or an ALUCP, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impact would occur, and this topic does not require further evaluation in the EIR.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Evaluation

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. California Housing Element Law (Gov. Code Sections 65580–65589.11) requires each city and county to adopt a housing element within its general plan to address existing and projected housing needs for all income levels. The housing element must include an assessment of housing needs and resources, identification of adequate sites for housing including emergency shelters, and goals, policies, and programs to remove constraints, preserve affordability, and affirmatively further fair housing. It must maintain internal consistency with other general plan elements and be updated on a regular cycle; for Inyo County, this is required on an 8-year cycle. The Inyo County 2021-2028 Housing Element Update (6th Cycle Update) was approved by the California Department of Housing and Community Development (HCD) in 2023 and complies with current State housing law as well as other local, State, and federal regulations (County 2023).

As discussed in the County's Housing Element Update, according to the Department of Finance, the population of the entire County as of January 1, 2020 was 18,584, and the unincorporated areas had a population of 14,763. The population of the unincorporated areas of the County has increased at an average annual rate of 0.4 percent, or six people per year, between 2013 and 2020 (County 2023).

The proposed water bottling facility would operate two bottling lines with three shifts per day. The proposed project would operate year-round, an average of 260 days per year; however, it is anticipated that peak levels of operation would occur during a three-month period during the summer. It is anticipated that project operation would require approximately 13 employees on-site per shift, for a total of 40 employees per day, including management personnel. There is potential for the proposed project to result in an incremental, direct increase in population in the County due to the creation of new jobs; however, because of the rural location of the project site, it is anticipated that the vast majority of project employees would be local residents that currently reside within the County. This incremental increase in population due to implementation of the proposed project would be minor and

would not represent substantial unplanned population growth in the County. Therefore, the impact would be less than significant, and this topic does not require further evaluation in the EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The proposed project is located in a rural area of the County within the unincorporated community of Grant. The project site is currently vacant and largely undeveloped; however, the project would require the demolition of the abandoned single-family ranch house in the northern portion of the site. However, as this house is currently vacant, demolition of the house required for project implementation would not displace substantial numbers of existing housing. As discussed above in the response to question a), the proposed project would not result in substantial population growth. Therefore, the proposed project would not necessitate the construction of replacement housing. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Evaluation

a) Fire protection?

Less Than Significant Impact. The project site is located within the service area of the Olancho Community Services District, which operates the Olancha Cartago Fire Department, a volunteer fire station located approximately 2.8 miles north of the project site in Olancha. Other fire stations in the project vicinity include the BLM's Olancha Fire Station, located 1.5 miles north of the project site; the Lone Pine Fire Station, located approximately 26 miles north of the project site; and the CAL FIRE San Bernadino/Inyo/Mono Unit (BDU) Independence Fire Station, located approximately 39 miles north of the project site. As discussed in greater detail in Section 5.XX, Wildfire, the project site is within an SRA and is mapped as a High FHSZ (CAL FIRE 2025). SRAs fall under the jurisdiction of CAL FIRE for the purposes of wildland fire prevention and suppression.

The proposed project would be required to adhere to existing regulations and requirements related to fire safety, including maintaining defensible space and setbacks. The project would be required to comply with the CBC Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, which prescribes building materials and construction methods for new buildings in any FHSZ or Wildland-Urban Interface Fire Area. CAL FIRE requires that the project comply with PRC Section 4291, which requires property owners to maintain clearance of flammable vegetation within 100 feet of structures in order to reduce the risk of fire. Similarly, the project would be required to adhere to Section 14.08.140 of the Inyo County Code, which stipulates that all properties in unincorporated areas in the County shall be maintained in accordance with the defensible space requirements of PRC Section 4291. Further, the proposed parking lot, truck staging area, and 16-foot-wide fire access road would serve to create a defensible fire zone around the perimeter of the proposed water bottling facility in the

event of a wildfire. All proposed electrical infrastructure would be required to be constructed and maintained in accordance with CBC and CPUC utility design and fire safety regulations.

The proposed project would construct an on-site fire suppression system tank, fire sprinkler system within the water bottling facility, and four fire hydrants installed around the perimeter of the building per CAL FIRE requirements. The proposed water bottling facility would be constructed with metal sidings and roofing that would be fire resistant. With adherence to existing regulations related to fire protection, implementation of the proposed project would not substantially increase fire risk or the risk of uncontrolled spread of a wildfire, and therefore, would not result in a substantial increase in demand on the existing fire protection services in the project area. Therefore, the proposed project would not result in adverse physical impacts to the environment associated with the provision of other new or physically altered fire protection facilities. Therefore, the impact would be less than significant, and this topic does not require further evaluation in the EIR.

b) Police protection?

Less Than Significant Impact. The proposed project would be served by the Inyo County Sheriff's Department, which provides law enforcement services to the unincorporated areas of the County, including the community of Grant. The two Sheriff's Department substations nearest to the project site are located in Lone Pine, approximately 20 miles north of the project site, and in Independence, approximately 39 miles north of the project site. In addition, the Sheriff's Department Headquarters are located in the City of Bishop, approximately 80 miles north of the project site. Traffic enforcement along the portion of US 395 within Inyo is in the jurisdiction of the California Highway Patrol's (CHP) Inland Division – Bishop Area. The CHP Bishop office is located approximately 80 miles north of the project site.

Project operation would include light manufacturing uses, specifically, packaging and loading of water bottles onto semi-trucks for shipment to retail locations in southern California. The proposed water bottling facility would include standard safety measures, including a chain-link security fence with barbed wire and perimeter lighting would be installed around the proposed well house. In addition, the project would include exterior security lighting to illuminate the loading dock area, building entrances, parking lot, and fire pump building. Due to the nature of the proposed project's operation, it is not anticipated that the project would result in a substantial increase in demand on police protection services in the project area. Therefore, the proposed project would not result in adverse physical impacts to the environment associated with the provision of other new or physically altered police protection facilities. Therefore, the impact would be less than significant, and this topic does not require further evaluation in the EIR.

c) Schools?

d) Parks?

e) Other public facilities?

Less Than Significant Impact. The project site is within the Lone Pine Unified School District, and the nearest schools are Lo-Inyo Elementary School and Lone Pine High School, both located in Lone Pine approximately 25 miles north of the project site. The Inyo County Parks and Recreation Department maintains local parks and recreation facilities in the unincorporated areas of the County. The nearest County parks to the project site include Portuguese Joe Campground, Zoey's Dog Park, and Spainhower Park, all located in Lone Pine approximately 25 miles north of the project site. Other recreation facilities

include vast areas of open space and national parks, including Death Valley National Park and Sequoia National Park. Other public facilities in the project area include the Lone Pine library and the Southern Inyo Healthcare District, which includes a hospital, rural health clinic, and emergency care located in Lone Pine.

As discussed in greater detail in Section 5.XIV, Population and Housing, although there is potential for the proposed project to result in a minor increase in population in the County, due to the rural location of the project site, it is anticipated that the vast majority of project employees would be local residents that currently reside within the County. As such, this incremental increase in population would be minor and would not represent substantial unplanned population growth in the County. Therefore, the proposed project would not result in a substantial increase in demand on existing schools, parks, or other public facilities. Implementation of the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, parks, or other public facilities. Therefore, the impact would be less than significant for questions c) through e), and these topics do not require further evaluation in the EIR.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Evaluation

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. The Inyo County Parks and Recreation Department maintains local parks and recreation facilities in the unincorporated areas of the County. The nearest County parks to the project site include Portuguese Joe Campground, Zoey's Dog Park, and Spainhower Park, all located in Lone Pine approximately 25 miles north of the project site. Other recreation facilities include vast areas of open space and national parks, including Death Valley National Park and Sequoia National Park. As discussed in greater detail in Section 5.XIV, Population and Housing, although there is potential for the proposed project to result in a minor increase in population in the County, due to the rural location of the project site, it is anticipated that the vast majority of project employees would be local residents that currently reside within the County. As such, this incremental increase in population would be minor and would not represent substantial unplanned population growth in the County. Therefore, the proposed project would not result in a substantial increase in the use of existing County parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The project would include the construction of a water bottling facility and would not include or require the construction or expansion of recreational facilities that would adversely affect the environment. Therefore, no impact would occur, and this topic does not require further evaluation in the EIR.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☒	☐	☐	☐

Evaluation

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

d) Result in inadequate emergency access?

Potentially Significant Impact. The proposed project may result in potentially significant impacts related to transportation for questions a) through d). Therefore, these topics will be further evaluated in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☒	☐	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

Evaluation

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places and objects, with cultural value to a tribe. The topic of tribal cultural resources and the requirements of Assembly Bill (AB) 52 will be further evaluated in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Evaluation

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. The proposed project would require the construction of new water lines, septic waste containment system, stormwater system and detention basins, and electric power facilities. The construction of the proposed utilities could cause potentially significant environmental effects. Therefore, question a) will be further evaluated in the EIR.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The proposed project includes the construction and operation of a new water bottling facility that would utilize a maximum of 410 AFY, or approximately 510,000 gpd, of groundwater from the proposed production well. It is anticipated that peak water demand would be highest during the summer months, as approximately 55 percent of the annual water usage would occur during this three-month period. The production well would primarily be used bottled water products;

however, ancillary uses of the well would include domestic/industrial water for the industrial cooling tower, fire suppression, landscape irrigation, and employee restrooms and breakrooms.

SB 610, as codified in the California Water Code (CWC) Division 6, Part 2.10 (Sections 10910-10915) requires preparation of a Water Supply Assessment (WSA) for "water-demand projects". CEQA Guidelines Section 15155(a)(1) provides the following definitions of water-demand projects:

(A) A residential development of more than 500 dwelling units.

(B) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.

(C) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.

(D) A hotel or motel, or both, having more than 500 rooms.

(E) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

(F) A mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.

(G) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

(H) For public water systems with fewer than 5,000 service connections, a project that meets the following criteria:

1. A proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of a public water system's existing service connections; or

2. A mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential development that would represent an increase of 10 percent or more in the number of the public water system's existing service connections.

The proposed project would not meet the definition of a water demand project per SB 610 or CEQA Guidelines Section 15155. In addition, the proposed project would not include residential development. Therefore, the proposed project would not require preparation of a WSA under the CWC, and the impact would be less than significant.

However, as noted in questions a), b), and e) of Section 5.X, Hydrology and Water Quality, the proposed project's potential impacts related to the degradation of ground water quality, ground water supplies and recharge, and sustainable groundwater management plan, will be further evaluated in the EIR.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The proposed project would not connect to a public sewer system and would instead utilize an on-site sewage disposal system. There is no public sewer system or central utility for sewer discharge in the project area. Therefore, the proposed project would not exceed the capacity of a wastewater treatment provider, and no impact would occur. This topic does not require further evaluation in the EIR.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. There are four landfills managed by Inyo County Recycling and Waste Management. The nearest landfill to the project site is the Lone Pine Landfill (14-AA-0003), which provides solid waste disposal to development in around the project vicinity. The Lone Pine Landfill is a Class III non-hazardous municipal solid waste facility that is permitted to receive construction/demolition, mixed municipal, and industrial waste, among others. The landfill has a permitted daily throughput of 22 tons per day, with a remaining capacity of 1,002,586 CY and an estimated closure date of 2052 (CalRecycle 2025).

Project construction would generate solid waste in the form of material/equipment packaging and demolition materials. Demolition of the existing vacant single-family ranch house on-site is anticipated to generate approximately 25 CY of solid waste to be hauled and disposed of off-site. All soils would be balanced on-site during grading and would not require disposal off-site. Project construction would be required to adhere to Chapter 7.11, Monitoring and Diversion of Construction and Demolition Debris, of the Inyo County Code, which would require the project applicant to divert all materials from the solid waste stream that can reasonably be diverted for alternate uses. Solid waste generated during construction would be short-term, minimal, and would not exceed State or local standards.

During operation, the proposed project would implement a recycling program to reduce the amount of solid waste from the project site diverted to the landfill in accordance with AB 939. Due to the relatively small number of employees on-site during operation, it is not anticipated that project operation would generate a substantial amount of solid waste and would not exceed State or local standards. Further, the proposed project would be served by an existing landfill with adequate capacity. The project would also be required to adhere to Chapter 7.08, Solid Waste Collection and Disposal, and Chapter 7.10, Solid Waste Disposal Sites, of the Inyo County Code. Therefore, as the project would be required to adhere to existing federal, State, and local regulations pertaining to solid waste, the impact would be less than significant for questions d) and e), and these topics do not require further evaluation in the EIR.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Evaluation

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. PRC Section 4201-4204 requires CAL FIRE to map lands within SRA, known as FHSZ maps. FHSZ maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. There are three levels of hazard in the SRA: Moderate, High, and Very High. The project site is within an SRA and is mapped as a High FHSZ (CAL FIRE 2025).

The Inyo County and City of Bishop MJHMP identifies evacuation routes in the County in the event of an emergency. US 395, which traverses the County north-south between Mono County and San Bernadino County, is identified as the primary evacuation for communities within the Owens Valley, including Grant. Other emergency evacuation routes in the County include SRs 127, 168, 178, 136, and 190 (County 2017).

The Inyo County 2016 EOP establishes the necessary emergency management organization and assigns functions and tasks consistent with California's SEMS and the NIMS. The EOP outlines how Inyo County will prepare for and respond to incidents using the SEMS (County 2016).

The proposed project would construct a new 40-foot-wide driveway off of SR 190 to the east. A 12-foot-wide deceleration lane would be installed along SR 190 to connect with the proposed driveway and would be constructed in accordance with Caltrans standards. A 16-foot-wide fire access road would be installed along the northern edge of the water bottling facility to provide internal fire access between the parking lot and truck staging area. In the event of an emergency in the project vicinity, US 395 and SR 190 would serve as evacuation routes. All construction and staging would take place within the project site and access to the project site would be maintained at all times during construction. In addition, the proposed project would be required to comply with all adopted emergency response and evacuation plans, including the MJHMP and EOP. Therefore, implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

However, the proposed project's potential impacts related to emergency access to the project site, and within the vicinity of the project site, will be evaluated in question d) of Section 5.XVII, Transportation. As noted in that section, potentially significant impacts related to emergency access will be further evaluated in the EIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. The project site does not contain significant slopes that could exacerbate wildfire risks, and implementation of the proposed project would not alter existing prevailing winds. The proposed project would be required to adhere to existing regulations and requirements related to fire safety, including maintaining defensible space and setbacks. CAL FIRE requires that the project comply with PRC Section 4291, which requires property owners to maintain clearance of flammable vegetation within 100 feet of structures in order to reduce the risk of fire. Similarly, the project would be required to adhere to Section 14.08.140 of the Inyo County Code, which stipulates that all properties in unincorporated areas in the County shall be maintained in accordance with the defensible space requirements of PRC Section 4291. The proposed parking lot, truck staging area, and 16-foot-wide fire access road would serve to create a defensible fire zone around the perimeter of the proposed water bottling facility in the event of a wildfire.

The project would also be required to comply with the CBC Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, which prescribes building materials and construction methods for new buildings in any FHSZ or Wildland-Urban Interface Fire Area. The proposed water bottling facility would be constructed with metal sidings and roofing that would be fire resistant, and all electrical infrastructure would be required to be constructed and maintained in accordance with CBC and CPUC utility design and fire safety regulations. The proposed project would construct an on-site fire suppression system tank, fire sprinkler system within the water bottling facility, and four fire hydrants installed around the perimeter of the building per CAL FIRE requirements. Therefore, through project design and adherence to existing regulations pertaining to wildfire prevention, the impact would be less than significant for questions b) and c). These topics do not require further evaluation in the EIR.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. Following potential wildfire events, secondary fire hazard risks can occur due to unstable slopes, such as flooding, landslides, erosion, and debris flows. However, as previously mentioned, the project site is relatively flat and does not contain significant slopes that could exacerbate wildfire risks or risk of secondary fire hazard. As discussed in Section 5.X, Hydrology and Water Quality, the project site is located within FEMA Flood Zone X, which is an area of minimal flooding. Therefore, in the unlikely event for a fire to occur on-site, the risk of flooding to occur immediately post-fire would be low. Further, the project site gently slopes from east to west; however, there are no habitable structures or other development downslope of the project site – or within the immediate project vicinity – that would be at risk of flooding. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The impact would be less than significant, and this topic does not require further evaluation in the EIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☒	☐	☐	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Evaluation

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed in Sections 5.IV, Biological Resources, 5.V, Cultural Resources, and 5.XVIII, Tribal Cultural Resources, implementation of the proposed project could have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As such, potentially significant impacts related to biological resources, cultural resources, and tribal cultural resources will be further evaluated in the EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?

Potentially Significant Impact. Implementation of the proposed project could contribute to cumulatively considerable impacts in combination with effects of past, current, and probable future projects in the region. Therefore, potential cumulative impacts as a result of the proposed project will be further evaluated in the EIR for each of the environmental topics for which potentially significant impacts were identified in this Initial Study.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As evaluated in Section 5.VII, Geology and Soils, implementation of the proposed project would not result in rupture of a known earthquake fault or strong seismic ground shaking, and the impacts related to these topics would be less than significant. As evaluated in greater detail in Sections 5.IX, Hazards and Hazardous Materials, and 5.XX, Wildfire, implementation of the proposed project would not create a significant hazard to the public or environment through routine transport, use, or disposal of hazardous materials or through reasonable foreseeable upset; impair implementation of or physically interfere with an adopted emergency response or evacuation plan; or exacerbate the risk of wildfire, and the impacts related to these topics were determined to be less than significant. In addition, the proposed project would not be within 0.25 mile of a school, on a hazardous materials site, or within an ALUCP or within two miles of an airport; therefore, no impact would occur related to these topics.

However, other potentially significant direct and indirect impacts to human beings related to air quality, geology and soils, transportation, and noise, as identified throughout this Initial Study, will be evaluated further in the EIR.

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7.0 PREPARERS

Inyo County

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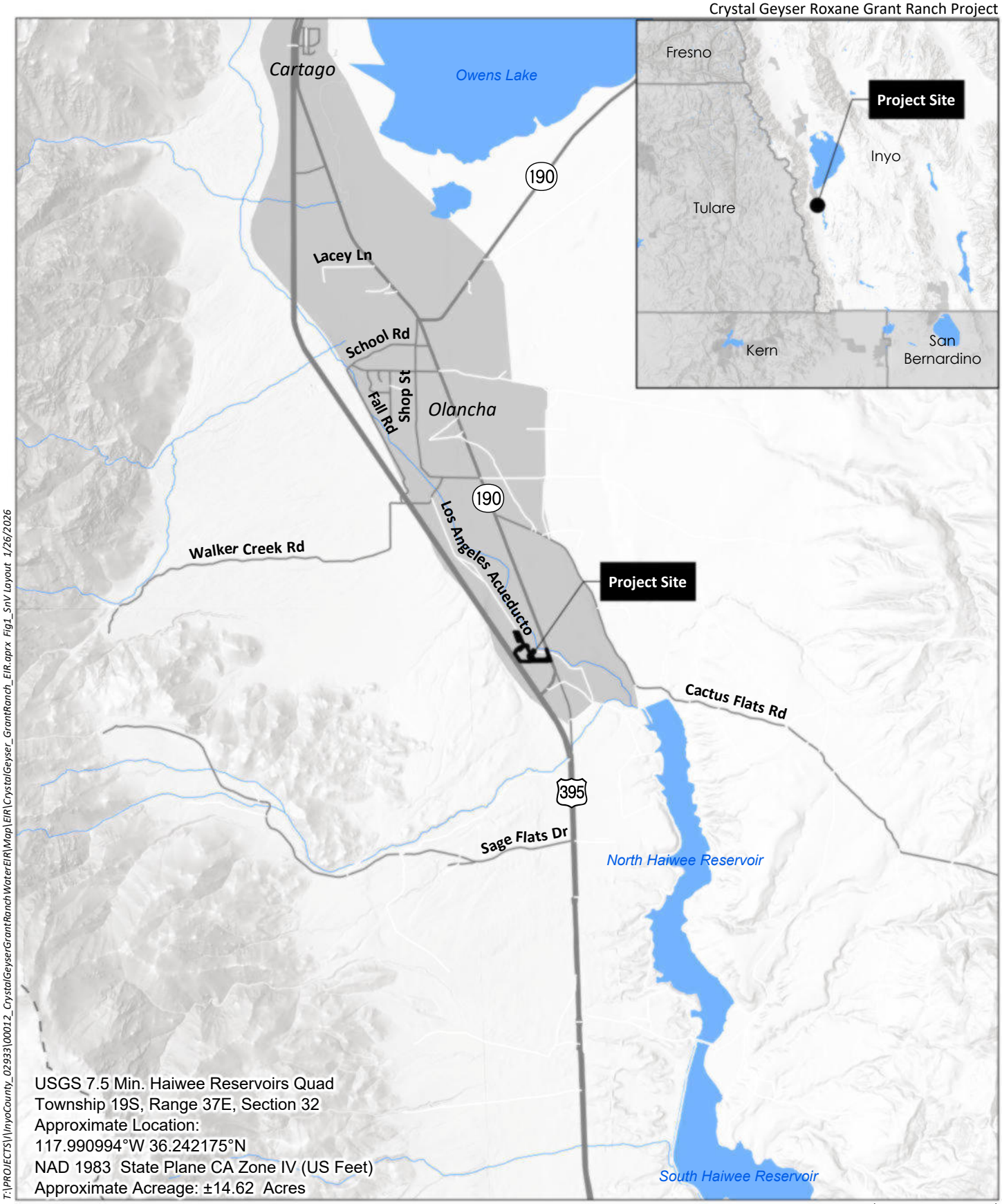
Appendix A

Figures



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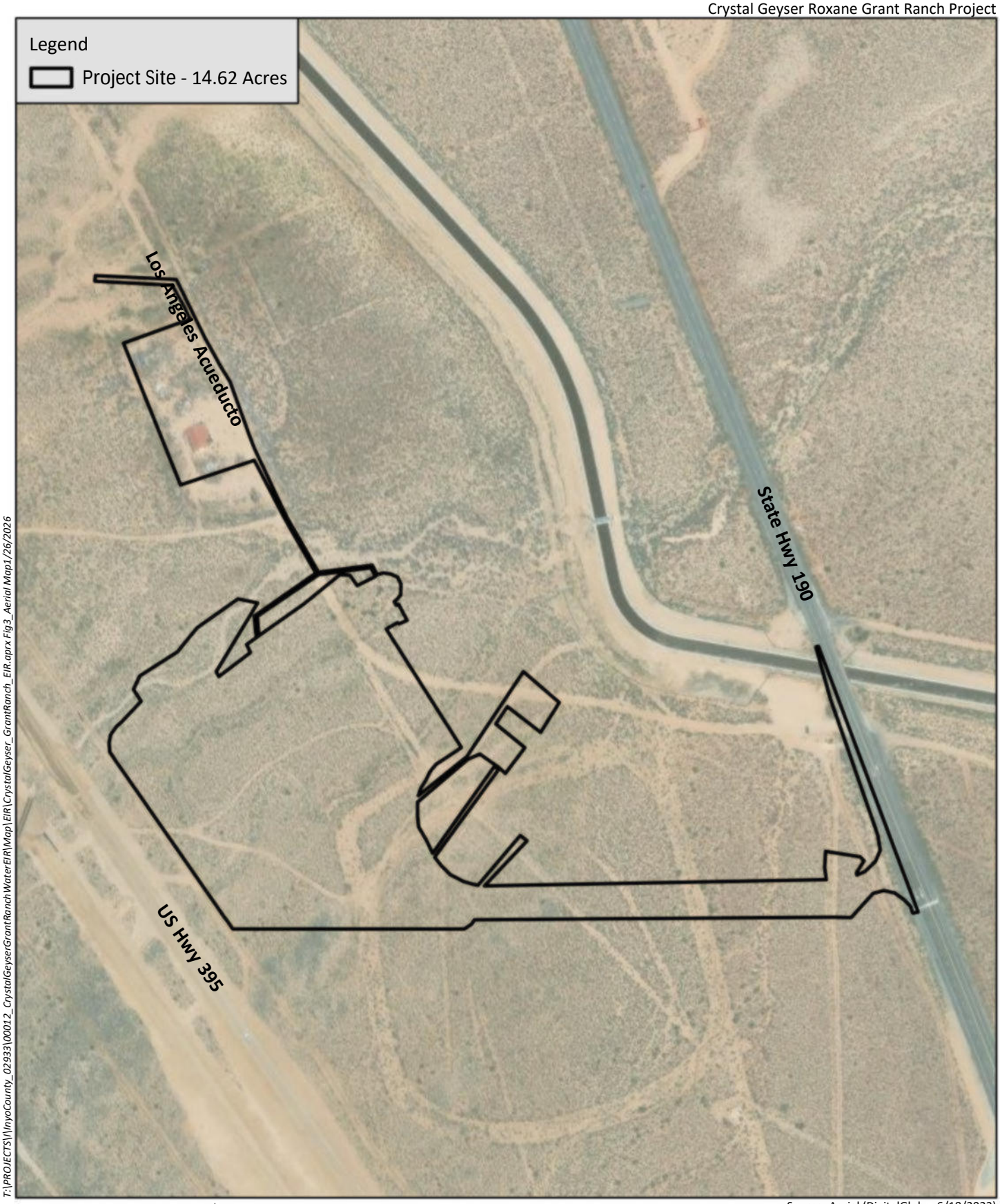
Source: Base Map Layers (Esri, USGS, NGA, NASA)

HELIX Environmental Planning

Site and Vicinity Map

Figure 1



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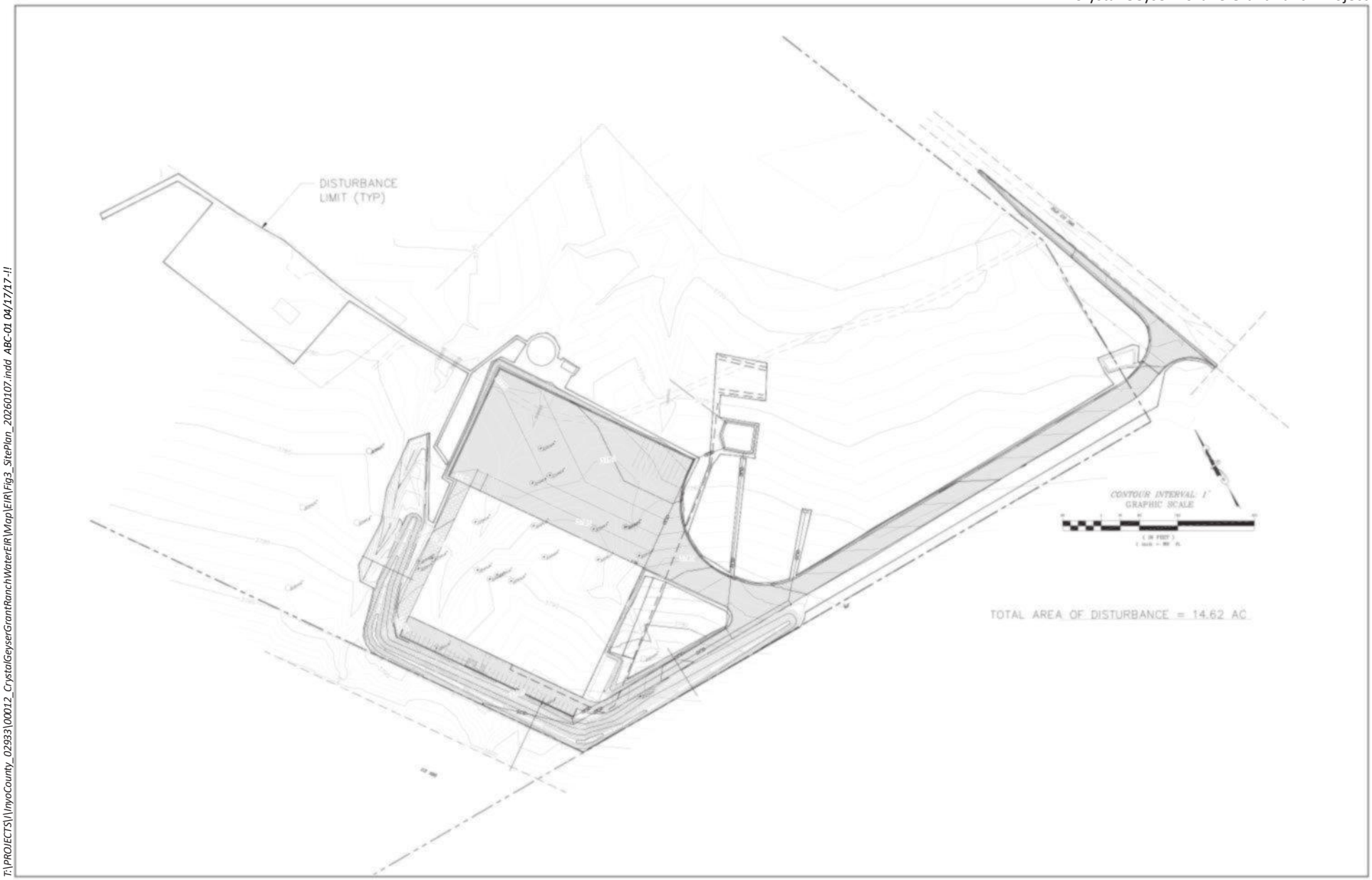
Source: Aerial (DigitalGlobe, 6/18/2023)

HELIX Environmental Planning

Aerial Map

Figure 2



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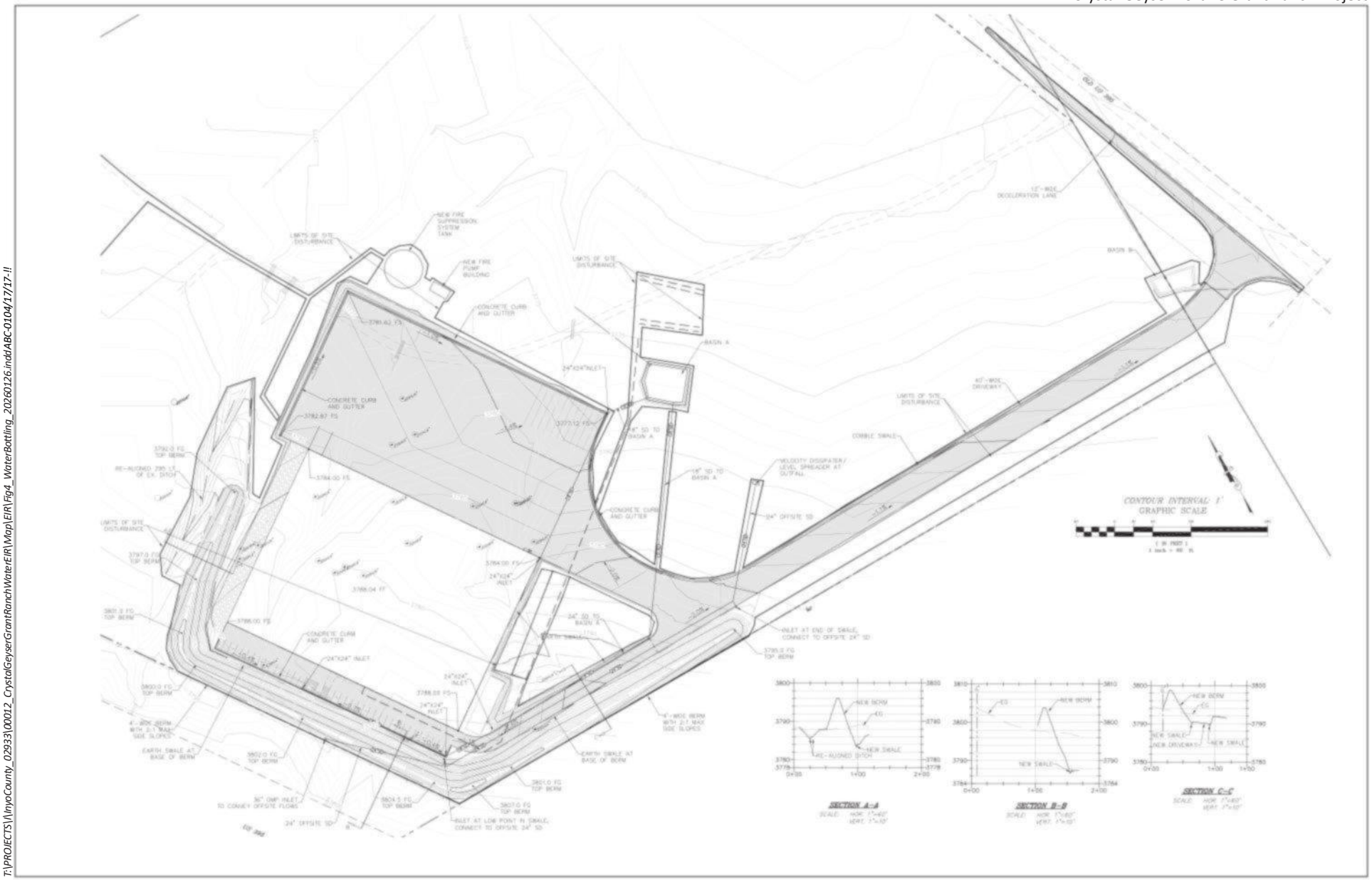
HELIX Environmental Planning

Water Bottling Facility Site Plan

Figure 3



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Source: THA, 2026

HELIX Environmental Planning

Water Bottling Facility Detail

Figure 4

Source: Crystal Geyser Roxane 2025

HELIX Environmental Planning

Northeastern Face

Figure 5

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Source: Crystal Geyser Roxane 2025

HELIX Environmental Planning

Southwestern Face

Figure 6

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