

Memorandum

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Date: April 23, 2026

To: Cathreen Richards, Planning Direction, Inyo County

From: Robert Edgerton, AICP CEP, HELIX Environmental Planning, Inc.

Subject: Public Scoping Memorandum for the Crystal Geyser Roxane Grant Ranch Project

This memorandum summarizes written and verbal comments received during the Notice of Preparation (NOP) comment period and two public scoping meetings conducted by Inyo County (County; Lead Agency) to support the Environmental Impact Report (EIR) for the proposed Crystal Geyser Roxane Grant Ranch Project ("proposed project" or "project"). HELIX Environmental Planning, Inc. (HELIX) staff and CG Roxane, LLC ("Applicant") were also in attendance at the public scoping meetings. The proposed project would include the construction of a water bottling facility, a warehouse, and shipping facilities, as well as internal roadways, employee parking and truck staging areas, a fire suppression tank and fire pump building, and other utilities.

This summary includes key trends and topics raised during NOP comment period, the approach and format of the public scoping meetings, and next steps for preparation of the Draft EIR. The NOP (and attached Initial Study) is included as Appendix A, and written comments submitted are included as Appendix B to this memorandum.

Overview

To assist the County in determining the focus and scope of the analysis for the Draft EIR and in accordance with the requirements of the California Environmental Quality Act (CEQA), the County issued an NOP (CEQA Guidelines Section 15082) to 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. This step ensures early consultation on the scope of the EIR. The 30-day public review period for the project started on January 28, 2026, and ended on February 27, 2026. The 30-day State agency review period for the project started on January 30, 2026, and ended on March 2, 2026. The County conducted two public scoping meetings during the NOP comment period at the following locations:

1. **February 10, 2026, at 6:00-7:30 p.m.:** Olancho Fire House, 689 Shop Street, Olancho, CA 93549
2. **February 11, 2026, at 6:00-7:30 p.m.:** Statham Town Hall, 138 N. Jackson Street, Lone Pine, CA 93545

At each meeting, County staff provided an overview of the proposed project and potential environmental impacts, as identified in the NOP and Initial Study. Participants were then provided an opportunity to ask questions to clarify their understanding of the project description, and to provide comments regarding potential environmental impacts, content of the Draft EIR, and the current and subsequent CEQA processes associated with the proposed project.

Scoping Meetings

General Questions and Answers

During the two public scoping meetings, the following themes and questions were raised regarding the project and CEQA process, with responses provided by County staff, HELIX, and/or the Applicant as necessary:

- **Questions were raised regarding the operations at the existing Crystal Geyser Roxane bottling facility in Cabin Bar, if it would remain active once the proposed project is constructed, and why a second facility is being proposed.** The project Applicant clarified that the existing bottling facility in Cabin Bar would remain in operation, as this facility utilizes non-mineral water, whereas the proposed project would utilize mineral water. The existing facility and proposed project would utilize the same aquifer, but different hydrologic zones.
- **Questions regarding the Cultural Resources Assessment process.** HELIX staff clarified that the Cultural Resources Assessment has not been prepared to date, but that it will be prepared to support the preparation of the Draft EIR.
- **Olancho Cartago Fire Department requested additional fire infrastructure, including a 10,000-gallon fire water tank and internal emergency lanes throughout the project for fire apparatus access.** This information was noted by the County and Applicant.
- **Safety concerns for shipping trucks due to high winds in the Owen's Valley, particularly in the vicinity of the project.** County and HELIX staff clarified that mitigation measures would be identified, as necessary, to mitigate potential safety impacts.
- **Use of on-site generators.** Generators are not proposed.
- **How much water would be pumped by the project?** 510,000 gallons per day (gpd).
- **Use of well water for proposed landscaping.** The proposed production well would be drilled and would be used as the source for all water uses during operation, including landscaping.
- **Depth of the proposed well.** The well depth is not currently known and will be determined at a later date; however, the depth of the existing well on-site, which would not be used by the proposed project, is approximately 500 feet deep and has a 10-inch diameter.
- **Packaging materials and quantity of plastic water bottles.** The project Applicant does not have a quantity of plastic water bottles to be used during project operation; however, Crystal Geyser Roxane implements a recycling program.

- **Would the project include perimeter fencing?** The perimeter of the water bottling facility would be fenced, in addition to the chain-link security fence around the proposed well house.
- **Would the project be a 24-hour facility?** The water bottling facility would not operate 24 hours per day.
- **Would the project hire locally?** The project Applicant clarified that the workforce during project operation would be primarily from outside the area.

Key Findings

Scoping meeting participants also provided input on a variety of potential environmental impacts and environmental issue areas, as summarized below:

- **Aesthetics:** Comments were raised regarding potential visual impacts to scenic views due to proposed facility, placement of solar photovoltaic panels, and new sources of light and glare.
 - **Response:** The EIR will evaluate the potential impacts related to aesthetics, including adverse effects on scenic vistas, State scenic highways, visual character or quality of public views of the site and its surroundings, and light and glare.
- **Air Quality and Greenhouse Gas Emissions:** Comments were raised regarding potential impacts to air quality and greenhouse gas (GHG) emissions from increased truck trips, and potential localized air quality impacts due to dust during site grading and preparation.
 - **Response:** An Air Quality and Greenhouse Gas Emissions Analysis will be prepared in support of the EIR to evaluate the project's potential impacts related to air quality and GHG emissions. The EIR will evaluate the potential for the project to conflict with an air quality plan, contribute to a cumulatively considerable net increase of non-attainment pollutants, expose sensitive receptors to pollutant concentrations, or result in other emissions. The EIR will also evaluate the project's potential to generate GHG emissions that may result in a significant impact on the environment and the project's consistency with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.
- **Cultural Resources:** Comments were raised regarding potential impacts to historical resources, including the existing ranch house on-site.
 - **Response:** A Cultural Resources Assessment will be prepared in support of the EIR to evaluate the project's potential effects on cultural resources, including adverse changes to historical and archaeological resources pursuant to Section 15064.5 of the CEQA Guidelines, and impacts to human remains.
- **Hydrology and Water Quality:** Comments were raised regarding potential impacts related to groundwater extraction, particularly in combination with existing facilities in the project area that extract groundwater.

- **Response:** A Hydrology and Water Quality Analysis Report will be prepared in support of the EIR, which will analyze the project's potential impacts related to water quality standards, sustainable groundwater basin management, alteration of local drainage, release of pollutants, and conflicts with water quality control plan or sustainable groundwater management plan. The analysis will include meteorological information, surface runoff characteristics of the site under baseline and proposed project conditions, the potential effects of groundwater pumping on groundwater quality, and analytical modeling of the drawdown caused due to groundwater pumping on nearby wells and springs.
- **Noise:** Comments were raised regarding potential impacts related to increase in noise on local roadways from trucks during operation, and impacts in combination with existing truck-related noise from the Cabin Bar Ranch.
 - **Response:** A Noise and Vibration Assessment will be prepared in support of the EIR, which will evaluate the project's potential impacts related to temporary and permanent increases in ambient noise levels, as well as generation of excessive groundborne vibration or noise levels.
- **Population and Housing:** Comments were raised regarding potential impacts related to population and housing due to out of area workforce.
 - **Response:** Impacts related to population and housing were evaluated in Section 5.XIV, Population and Housing, of the Initial Study prepared for the proposed project (included within Appendix A to this memorandum). The Initial Study concluded that the proposed project would result in a less than significant impact on population and housing; therefore, this topic does not require further evaluation in the EIR.
- **Public Services:** Comments were raised regarding potential impacts to Olancho Cartago Fire Department (OCFD) resulting from potential increased demand for fire protection services during project construction and operation.
 - **Response:** Impacts related to public services were evaluated in Section 5.XV, Public Services, of the Initial Study prepared for the proposed project. However, the OCFD indicated that the project may require additional fire water components may be required to ensure that OCFD would have adequate capacity and infrastructure to serve the proposed project. Therefore, impacts specifically related to fire protection services will be further evaluated in the EIR.
- **Utilities and Service Systems:** Solid waste impacts related to plastic water bottle use.
 - **Response:** Impacts related to solid waste were evaluated in Section 5.XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. The Initial Study concluded that the proposed project would not 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. The impact was determined to be less than significant; therefore, this topic does not require further evaluation in the EIR.

- **Wildfire:** Comments were raised regarding potential wildfire risks during construction and operation.
 - **Response:** Impacts related to wildfire risk were evaluated in Section 5.XX, Wildfire, of the Initial Study prepared for the proposed project. The Initial Study concluded that the proposed project would not substantially exacerbate wildfire risks, and the impact was determined to be less than significant. Therefore, this topic does not require further evaluation in the EIR.

NOP Comment Letters

The County received a total of 44 comments letters, including 40 comment letters from the public, one letter from the Lone Pine Paiute-Shoshone Reservation (LPPSR), and three letters from the following State agencies: State of California Department of Justice (DOJ), California Department of Fish and Wildlife (CDFW), and the Native American Heritage Commission (NAHC). Of these 44 comment letters, two were received after closure of the 30-day public review period; however, they have still been included as part of the record.

Public Comments

The following list provides a summary of each environmental resource area raised in the written public comments:

- **Biological Resources:** Comments requested that the EIR evaluate impacts to groundwater-dependent ecosystems, springs, seeps, native vegetation, and wildlife habitat.
 - **Response:** A Biological Resources Assessment will be prepared in support of the EIR to evaluate the project's potential effects on biological resources, including potential impacts to candidate, sensitive, or special-status plant and wildlife species; sensitive natural communities; protected wetlands; and species movement or migratory wildlife corridors. The EIR will also evaluate the project's consistency with local policies and ordinances protecting biological resources, and consistency with applicable habitat conservation plans.
- **Cultural Resources:** One comment requested that the EIR evaluate impacts to cultural resources.
 - **Response:** A Cultural Resources Assessment will be prepared in support of the EIR to evaluate the project's potential effects on cultural resources, including adverse changes to historical and archaeological resources pursuant to Section 15064.5 of the CEQA Guidelines, and impacts to human remains.
- **Hydrology and Water Quality:** Comments requested the EIR evaluate the project's impacts on hydrology and water quality resulting from groundwater extraction.
 - **Response:** A Hydrology and Water Quality Analysis Report will be prepared in support of the EIR, which will analyze the project's potential impacts related to water quality standards, sustainable groundwater basin management, alteration of local drainage,

release of pollutants, and conflicts with water quality control plan or sustainable groundwater management plan. The analysis will include meteorological information, surface runoff characteristics of the site under baseline and proposed project conditions, the potential effects of groundwater pumping on groundwater quality, and analytical modeling of the drawdown caused due to groundwater pumping on nearby wells and springs.

- **Transportation:** One comment expressed concern regarding the project's contribution to vehicle trips on the Olancho Bypass and requested a California Department of Transportation (Caltrans) traffic study be conducted for the project.
 - **Response:** A Traffic Impact Analysis will be conducted in support of the proposed project. The EIR will evaluate the potential impacts related to transportation, including emergency access, vehicle miles traveled (VMT), and road safety and hazards.
- **Tribal Cultural Resources:** Comments requested that the County engage in early and meaningful consultation with tribes in the Owen's Valley in accordance with Assembly Bill (AB) 52.
 - **Response:** On July 25, 2025, the County mailed letters to 19 representatives for nine tribes to provide an opportunity to request consultation on this project, per AB 52. To-date, the County has not received requests for consultation from the tribes. The EIR will evaluate the project's potential to result in adverse changes in the significance of tribal cultural resources as defined in Public Resources Code (PRC) 21074.
- **Utilities and Service Systems:** Comments expressed concern regarding solid waste, specifically, the use of plastic bottles and packaging during project operation.
 - **Response:** Impacts related to solid waste were evaluated in Section 5.XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (included within Appendix A to this memorandum). The Initial Study concluded that the proposed project would result in a less than significant impact related to the project's potential to 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; therefore, this topic does not require further evaluation in the EIR.
- **Cumulative Impacts:** Comments requested that the EIR include a discussion of cumulative impacts, specifically cumulative impacts on biological resources and hydrology and water quality.
 - **Response:** Per Section 15130 of the CEQA Guidelines, the EIR will include a discussion of cumulative impacts of the project combined with past, present, and probable future projects in the project area. Cumulative impact analyses will be conducted for each of the environment resource areas evaluated in the EIR, including biological resources and hydrology and water quality.
- **Project Alternatives:** One comment requested that the EIR include a robust range of alternatives, including a reduced pumping alternative and a no-project alternative.

- **Response:** This comment is noted. Although project alternatives have not been selected at this time, the EIR will evaluate a range of alternatives and the no-project alternative per CEQA Guidelines 15126.6.

Agency Comments

The following list provides a summary of each environmental resource area addressed in the written agency comments.

- **Air Quality, Greenhouse Gas Emissions, and Noise:** The letter from the State DOJ commented on the environmental impacts associated with diesel trucks visiting warehouses, including impacts related to air quality, GHGs emissions, and noise. This letter also provided a document with information on best management practices (BMP) and mitigation measures for warehouse projects, published by the DOJ.
 - **Response:** This comment is noted. As previously discussed above, an Air Quality and Greenhouse Gas Emissions Analysis and a Noise and Vibrations Assessment will be prepared in support of the EIR, which will evaluate the potential impacts related to air quality, GHG, and noise.
- **Biological Resources:** The letter from CDFW provided comments and recommendations regarding the project's assessment of biological resources; analysis of direct, indirect, and cumulative impacts to biological resources; alternatives analysis; identification of mitigation measures; and native/water-wise landscaping.
 - **Response:** This comment is noted. As previously discussed above, a Biological Resources Assessment will be prepared in support of the EIR to evaluate the project's potential effects on biological resources, including potential impacts to candidate, sensitive, or special-status plant and wildlife species; sensitive natural communities; protected wetlands; and species movement or migratory wildlife corridors. The EIR will also evaluate the project's consistency with local policies and ordinances protecting biological resources, and consistency with applicable habitat conservation plans.
- **Tribal Cultural Resources:** The letter from the NAHC outlined tribal consultation requirements per PRC 21074, and provided standard information on the applicability of AB 52 for projects for which an NOP is filed. The letter recommended consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.
 - **Response:** On July 25, 2025, the County mailed letters to 19 representatives for nine tribes to provide an opportunity to request consultation on this project, per AB 52. To-date, the County has not received requests for consultation from the tribes. The EIR will evaluate the project's potential to result in adverse changes in the significance of tribal cultural resources as defined in PRC 21074.

Next Steps

The County will consider the information and topics raised during the scoping period for the proposed project during preparation of the Draft EIR.

Appendices

- A. Notice of Preparation
- B. Written Comments

Appendix A

Notice of Preparation and Initial Study

Notice of Preparation

Notice of Preparation

To: State Clearinghouse From: Inyo County Planning Dept.
1400 Tenth Street 168 N. Edwards Street, P.O. Drawer L
Sacramento, CA 95814 Independence, CA 93526

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.: Olancho Fire House, 689 Shop Street, Olancho, 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 Olancho 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.: Olancho Fire House, 689 Shop Street, Olancho, CA 93549

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

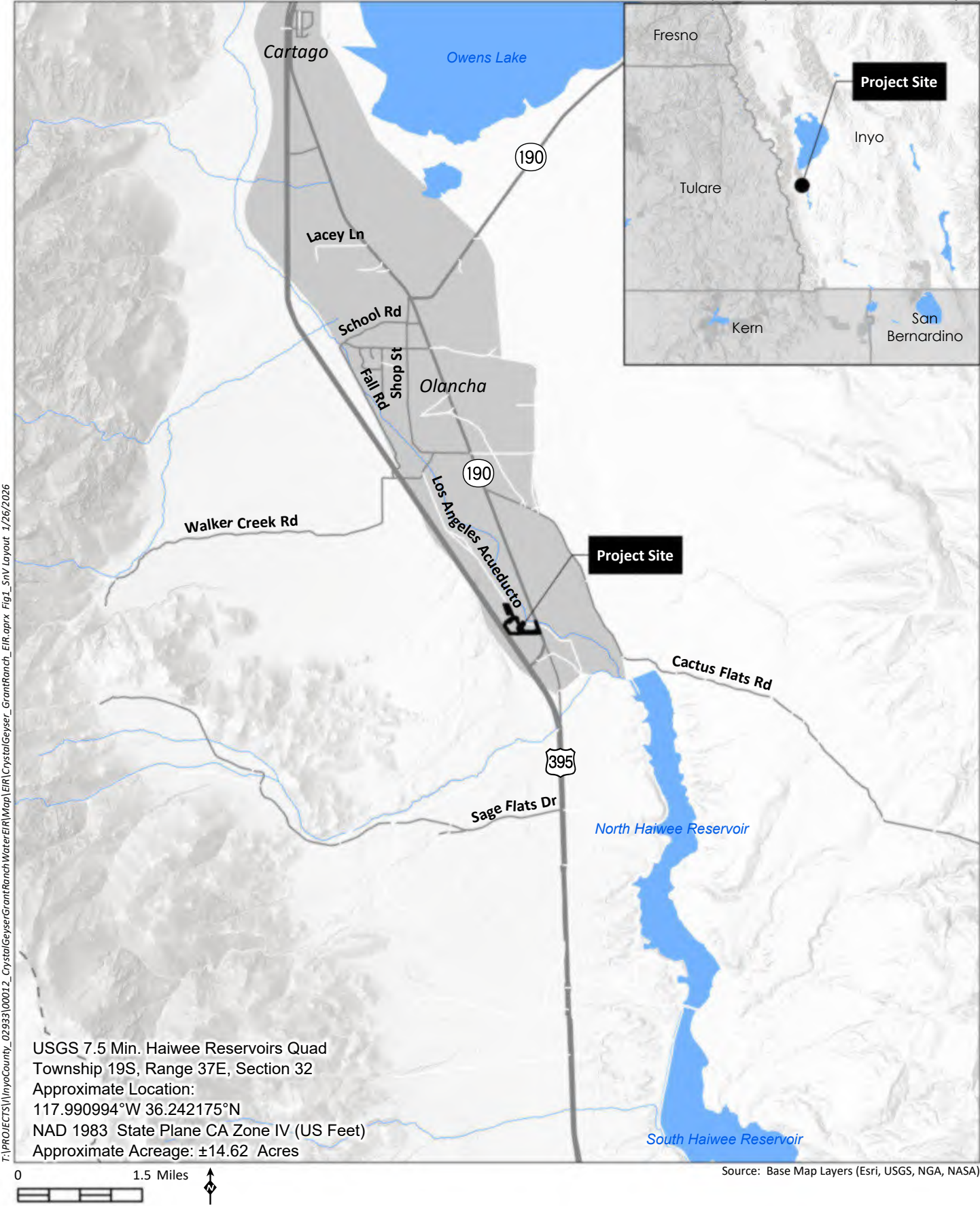
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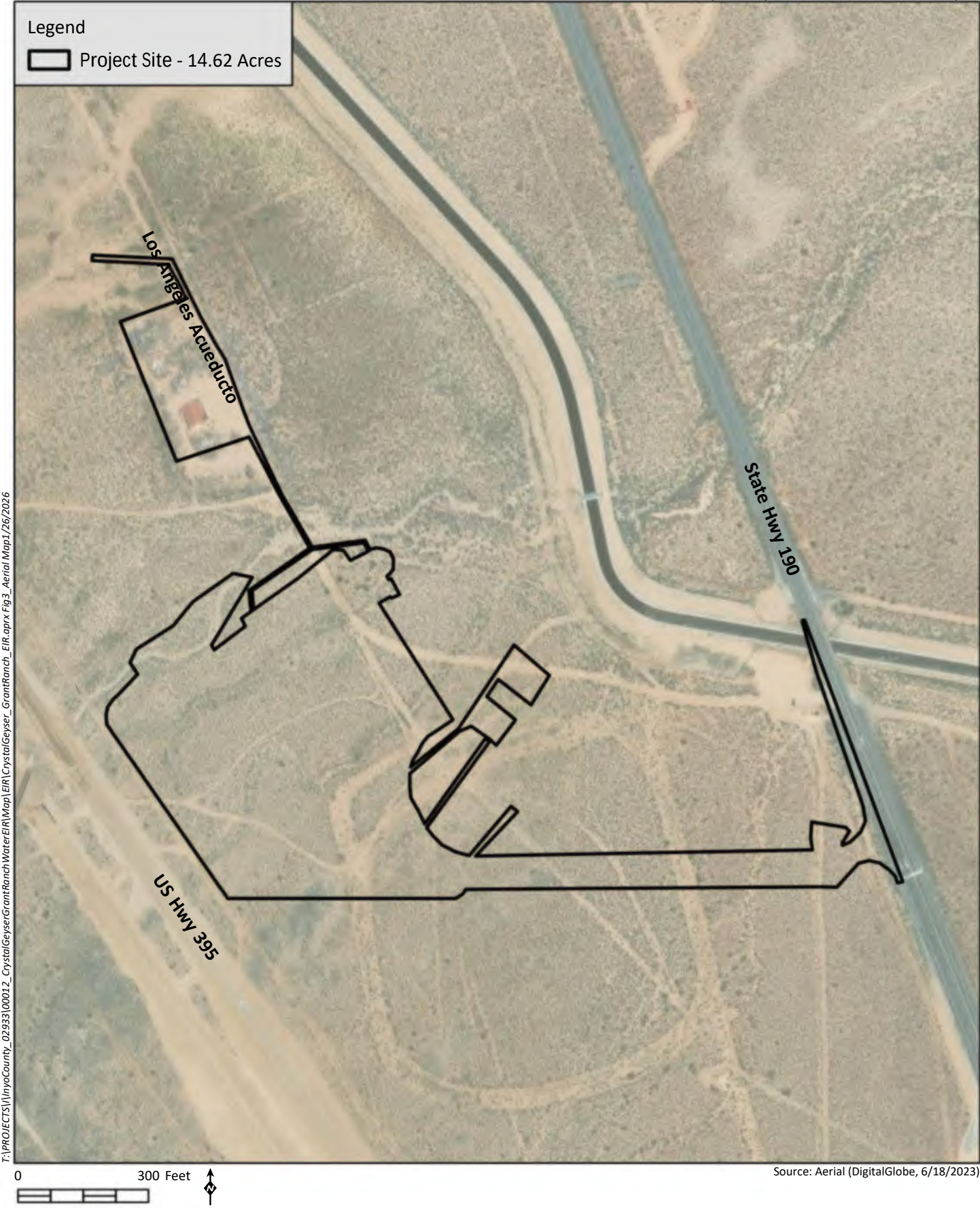
As specified by the CEQA Guidelines, the NOP will be circulated for a 30-day review period. The public review period is from January 28, 2026, through February 27, 2026. Please send all written comments to Cathreen Richards, Inyo County at the address shown above or email to crichards@inyocounty.us with "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

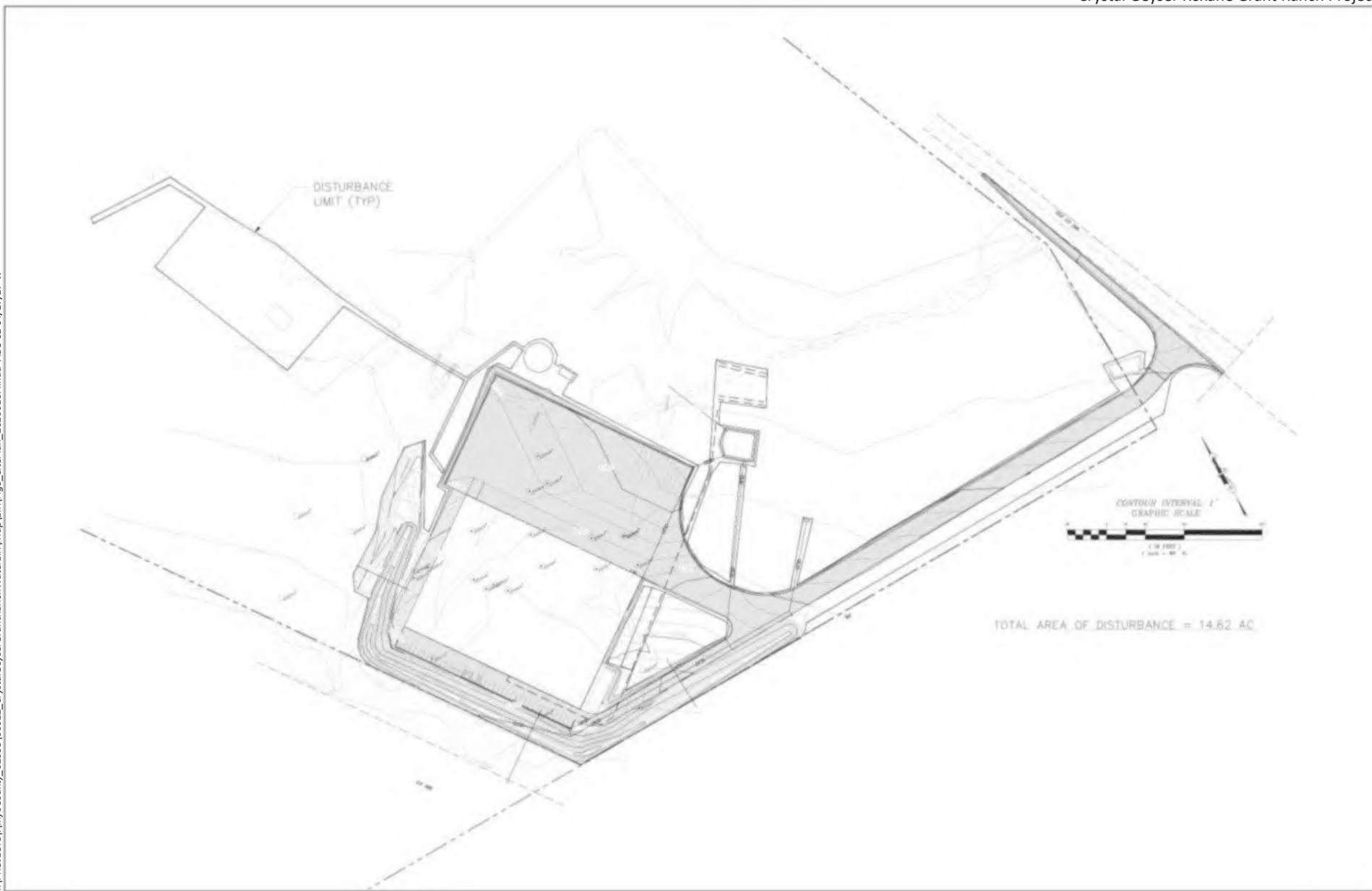
Figures





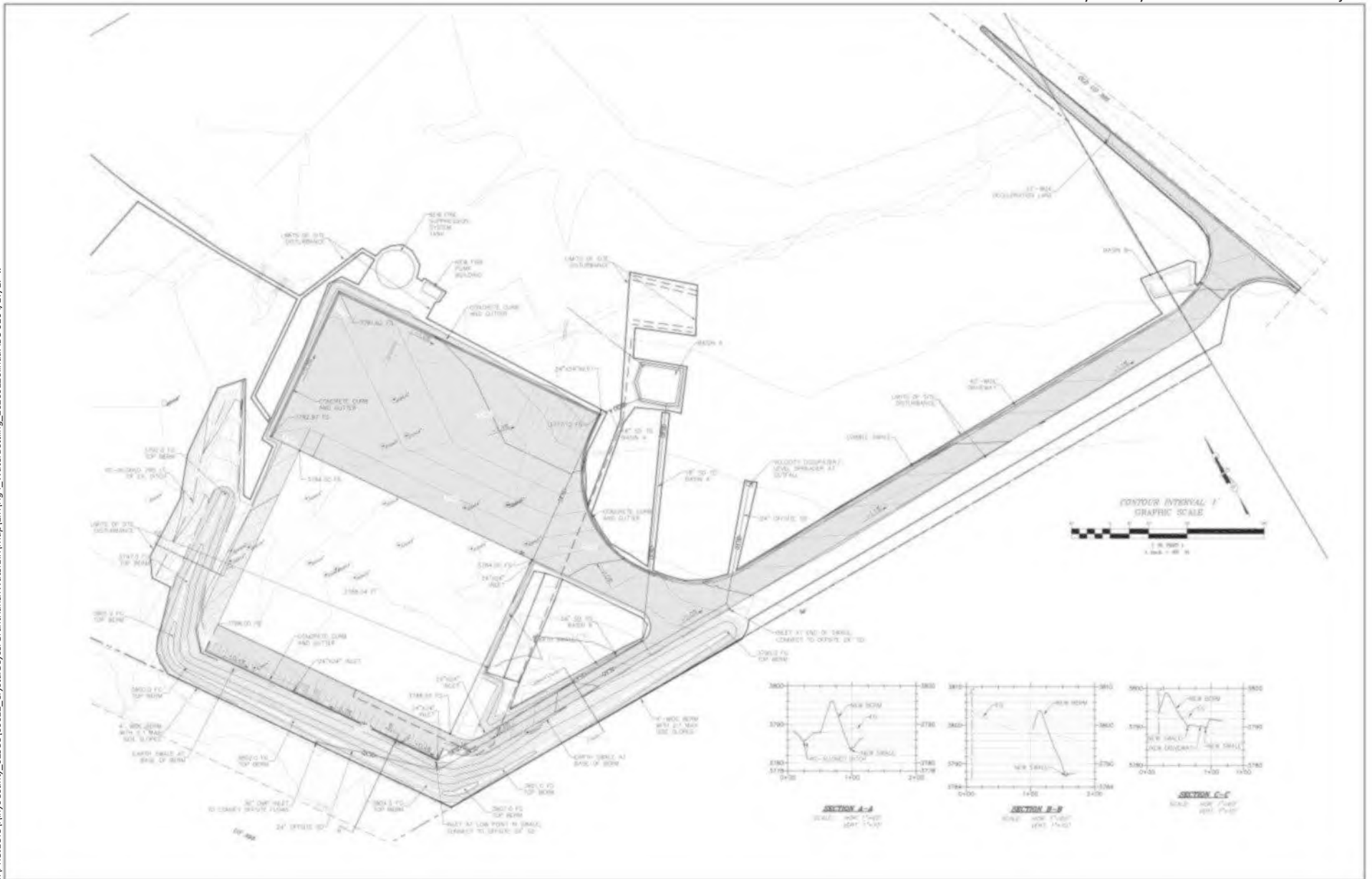
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Source: THA, 2026



Source: Crystal Geyser Roxane 2025

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Appendix B

Initial Study

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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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 Olancho. 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 Olancho 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 Olancho 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 Olancho 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 1) 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

Cathleen Richards

Printed Name

1/26/26

Date

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 Olancho (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 where 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 Olancho Cartago Fire Department, a volunteer fire station located approximately 2.8 miles north of the project site in Olancho. Other fire stations in the project vicinity include the BLM's Olancho 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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<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Olancha%2C+CA>

7.0 PREPARERS

Inyo County

Cathreen Richards, Planning Director

HELIX Environmental Planning, Inc.

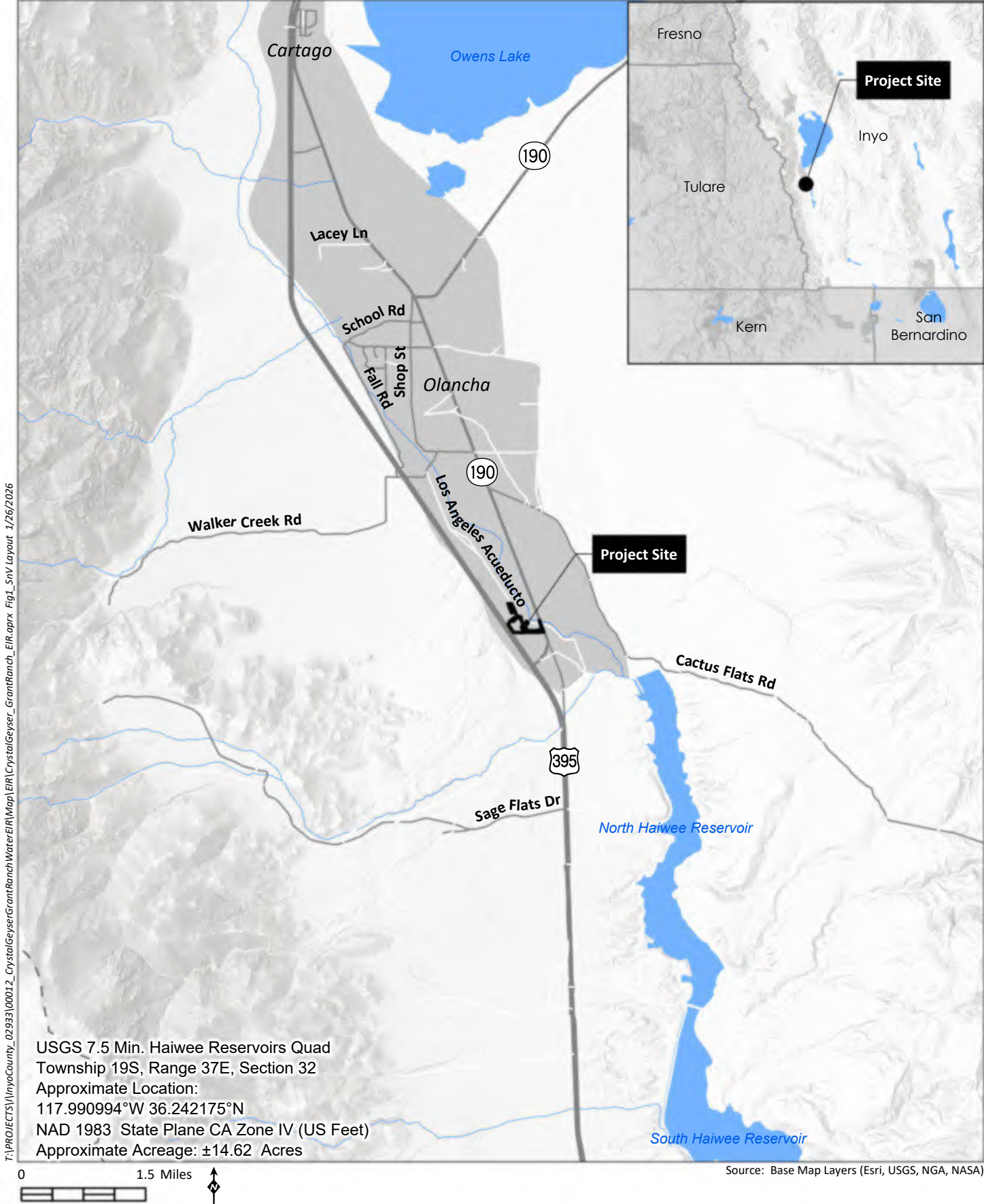
Robert Edgerton, AICP CEP, Principal Planner

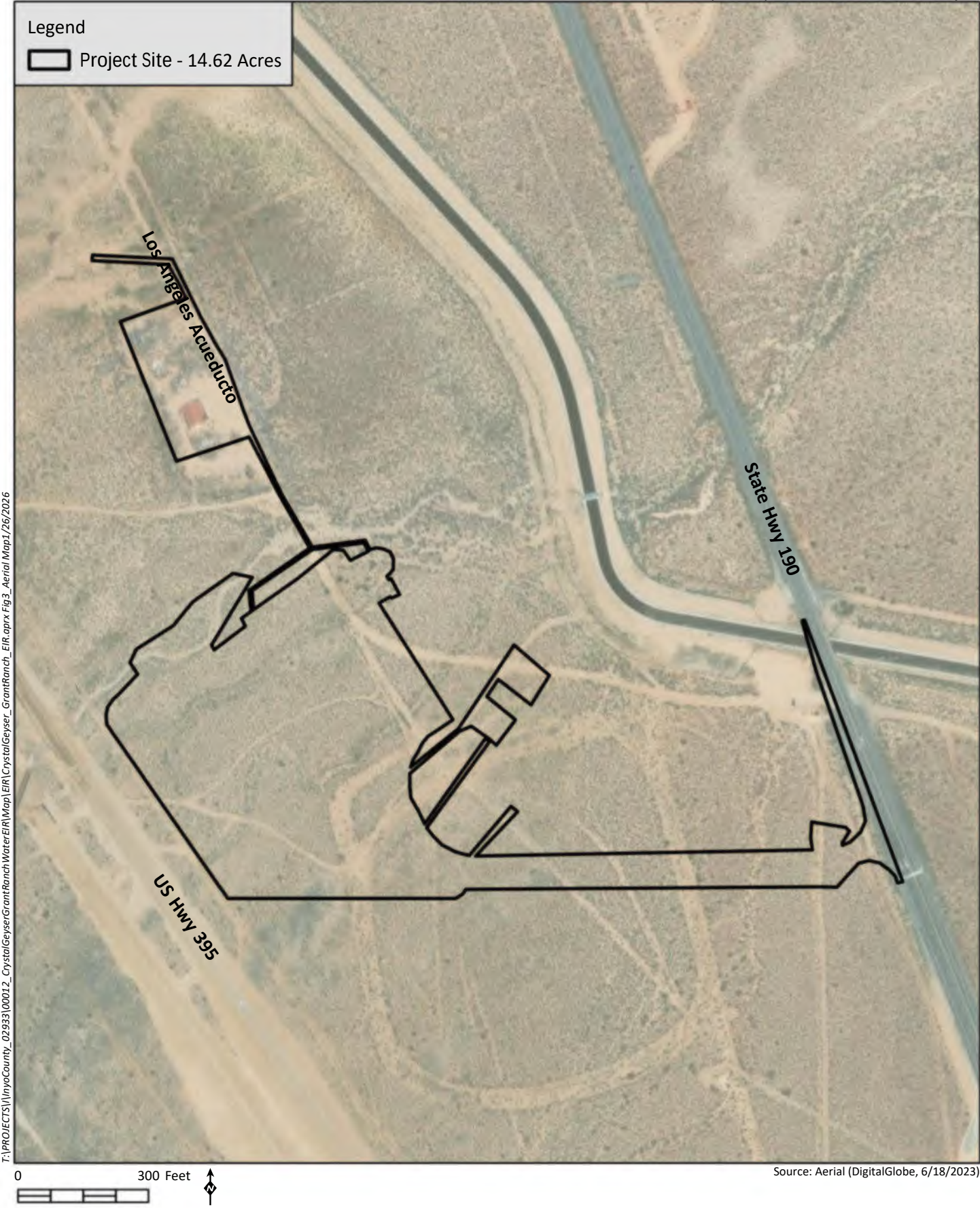
Emmaline deBecker, Environmental Planner

John DeMartino, GIS Specialist

Appendix A

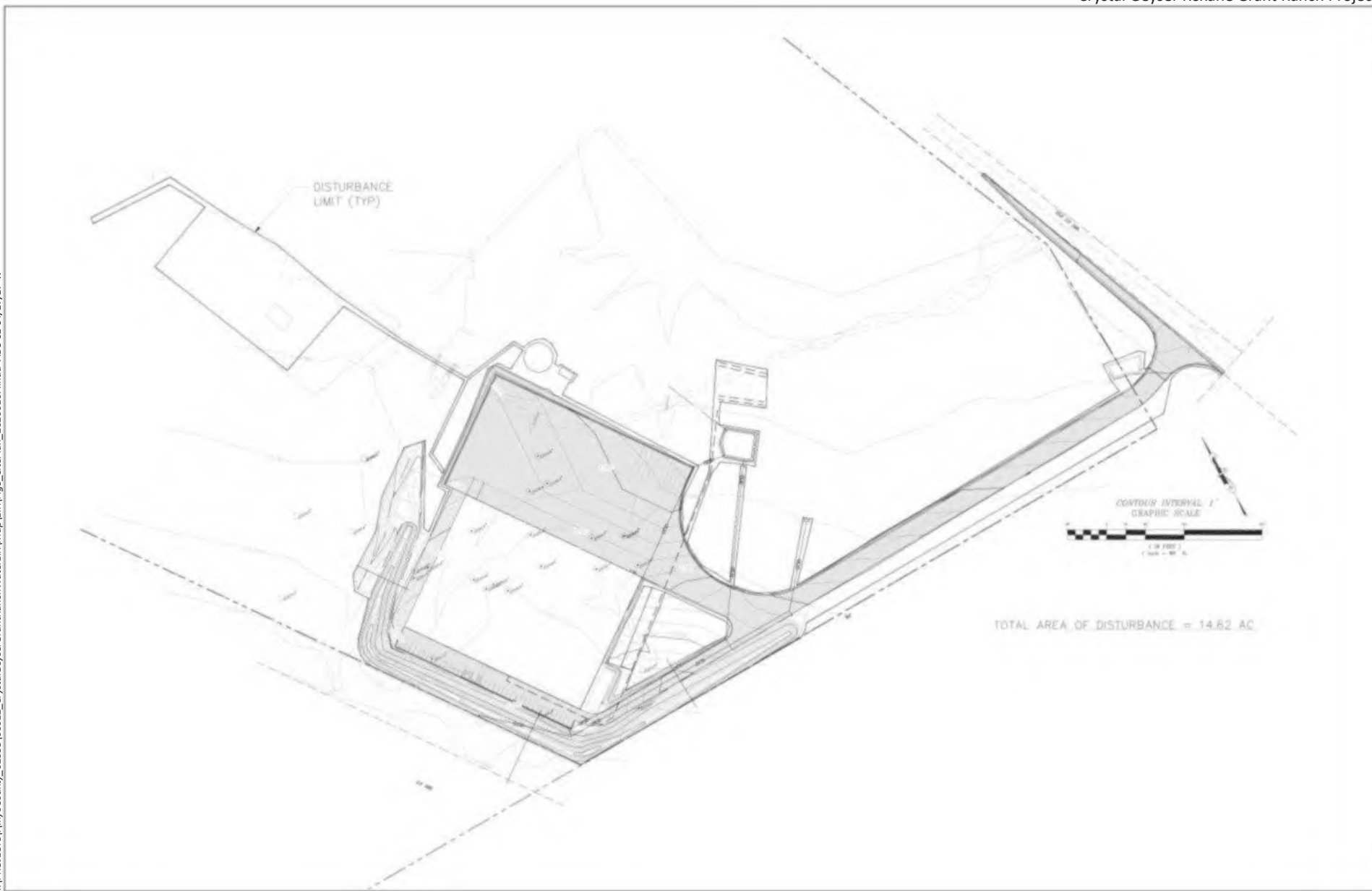
Figures





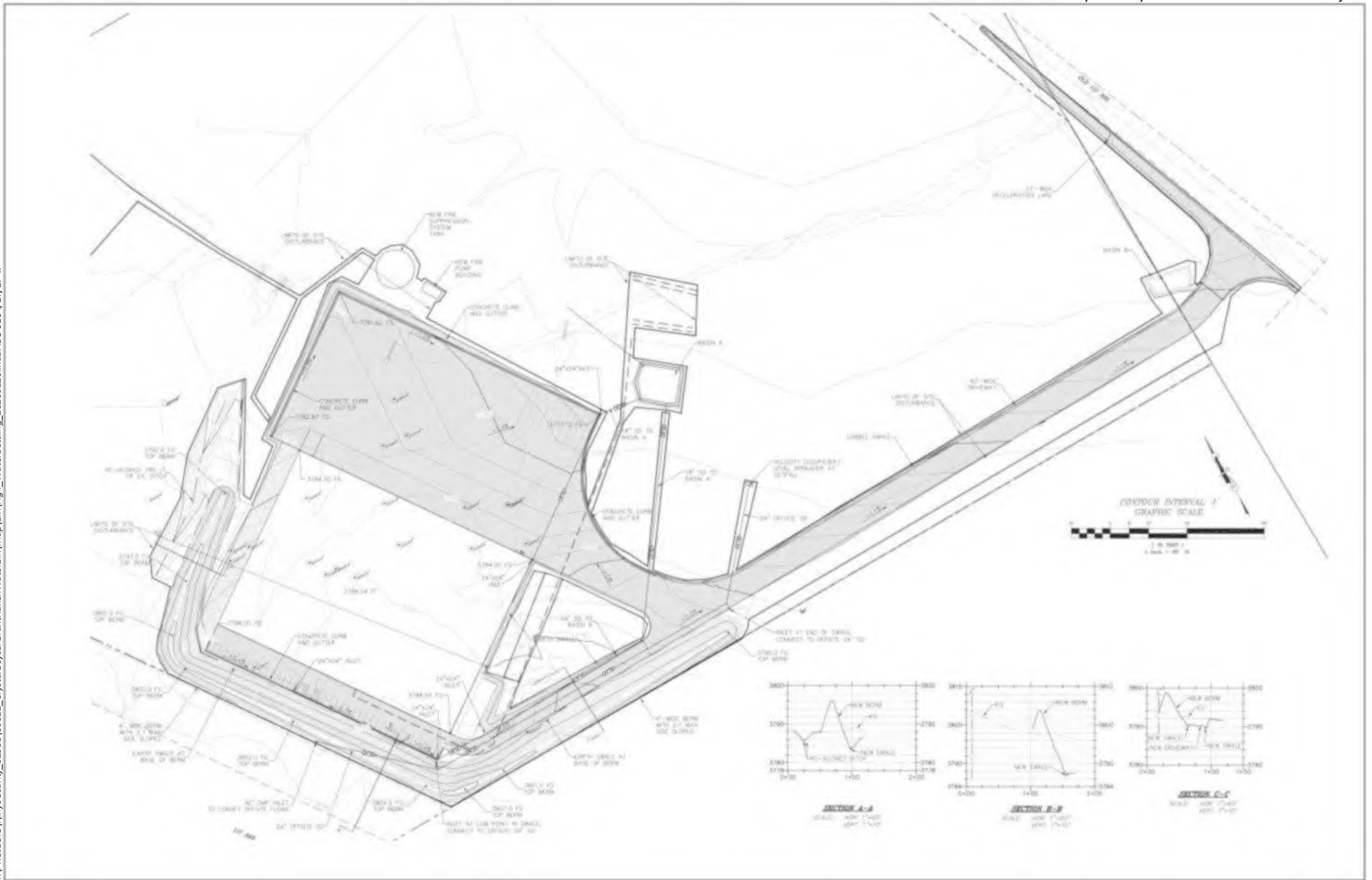
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Source:THA, 2026

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Source: THA, 2026



Source: Crystal Geyser Roxane 2025

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Source: Crystal Geyser Roxane 2025

Appendix B

Written Comments



February 4, 2026

Cathreen Richards, Planning Director
Inyo County
168 N. Edwards Street
Independence, CA 93526

RE: Crystal Geyser Roxane Grant Ranch Project, SCH #2026011104

Dear Ms. Richards:

Thank you for the opportunity to provide comments on the Notice of Preparation for the Crystal Geyser Roxane Grant Ranch Project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.² The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a copy of this document to this letter, and it is also available online.³ We encourage you to

¹ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (DPM).

² Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

³ <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>.

consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'CV' or similar initials, written in a cursive style.

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
 Attorney General



Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

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In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)¹ regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.² This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.³ It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.⁴ While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.⁵ California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.⁶ The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.⁷ Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.⁸ This trend has only accelerated, with e-commerce growing to

¹ <https://oag.ca.gov/environment/justice>.

² <https://oag.ca.gov/environment/ceqa>; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).

³ This September 2022 version revises and replaces the prior March 2021 version of this document.

⁴ Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.

⁵ As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.

⁶ Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), <https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/> (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).

⁷ U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at <https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm> (last accessed September 18, 2022).

⁸ South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.⁹ The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.¹⁰

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹¹ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.¹² The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California’s environmental justice screening tool, which measures overall pollution and demographic vulnerability.¹³ That

⁹ U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), available at <https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report> (last accessed September 18, 2022).

¹⁰ CBRE Research, *supra* note 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), available at <https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html>.

¹¹ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (last accessed September 18, 2022) (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts> (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (last accessed September 18, 2022) (DPM).

¹² Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

¹³ South Coast Air Quality Management District, “Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305” (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.¹⁴ Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.¹⁵

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors¹⁶ can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

¹⁴ *Id.* at 5-7.

¹⁵ Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported “riskiness” of loaning to their residents. In California cities where such “redlining” maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded “red,” signifying the least desirable areas where investment was to be avoided. See University of Richmond Digital Scholarship Lab, Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca> (Los Angeles), <https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca> (San Diego), <https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca> (Oakland), <https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca> (Stockton), <https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca> (Fresno) (all last accessed September 18, 2022).

¹⁶ In this document, “sensitive receptors” refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.¹⁷

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.¹⁸ Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.¹⁹

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

¹⁷ For more information about SB 1000, see <https://oag.ca.gov/environment/sb1000>.

¹⁸ <https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf> (last accessed September 18, 2022).

¹⁹ For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf> (last accessed September 18, 2022) (Riverside County); <http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=> (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.²⁰
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

²⁰ CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), available at https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.²¹
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

²¹ CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California’s Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage²² to or from the project site to be zero-emission beginning in 2030.

²² “Drayage” refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

- trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
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February 23, 2026
Sent via email

Cathreen Richards, Planning Director
Inyo County
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Independence, CA 93526
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Subject: Notice of Preparation of a Draft Environmental Impact Report
Crystal Geyser Roxane Grant Ranch Project
State Clearinghouse No. 2026011104

Dear Cathreen Richards:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from Inyo County (County) for the Crystal Geyser Roxane Grant Ranch Project (Project) pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to comment on aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project is located in the unincorporated community of Grant, Inyo County, State of California, on a portion of Assessor's Parcel Number (APN) 033-110-60 and at approximately latitude 36.234892 and longitude -117.986404. The Project proposes to construct 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 would require demolition of an existing onsite vacant ranch house. 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. 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 Project requires the County's 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.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Inyo County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or

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association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer, Keeler-Wolf, & Evens, 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov or <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Special status species that the Project footprint has the potential to support, include but are not limited to: American badger (*Taxidea taxus*), burrowing owl (*Athene cunicularia*), Crotch's bumble bee (*Bombus crotchii*), desert kit fox (*Vulpes macrotis arsipus*), desert tortoise (*Gopherus agassizii*), loggerhead shrike (*Lanius ludovicianus*), Swainson's hawk (*Buteo swainsoni*), Mohave ground squirrel (*Xerospermophilus mohavensis*), Owens Valley vole (*Microtus californicus vallicola*), Panamint kangaroo rat (*Dipodomys panaminitinus panaminitinus*), Wong's springsnail (*Pyrgulopsis wongi*), Townsend's big-eared bat (*Corynorhinus townsendii*), and pallid bat (*Antrozous pallidus*).

Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (California Department of Fish and Wildlife, 2018). Sensitive plant species that the Project footprint has the potential to support, include but are not limited to:

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western Joshua tree (*Yucca brevifolia*), sanicle cymopterus (*Cymopterus ripleyi* var. *saniculoides*), and Booth's evening-primrose (*Eremothera boothii* ssp. *Boothii*).

5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.
7. Species-specific surveys for special status species that the Project footprint has the potential to support, including:

Burrowing owl (*Athene cunicularia*)

On October 10, 2024, the Fish and Game Commission designated burrowing owl as a candidate species under CESA. The Project, as described, may result in take of burrowing owl. California Fish and Game Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". CDFW considers the take of burrowing owl and the loss of the species' habitat as a significant impact, unless mitigated to a level of less than significant, which would occur through a CESA Incidental Take Permit (ITP). Further, burrowing owl is protected under Fish and Game Code section 3503.5 and the Migratory Bird Treaty Act.

CDFW recommends that the County follow the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Wildlife, 2012); available for download from CDFW's website. The Staff Report on Burrowing Owl Mitigation, specifies three steps for Project impact evaluations:

- a. A habitat assessment;
- b. Surveys; and
- c. An impact assessment

Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, 3503.5, and 2081. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly. The information gained from these steps should be included in the DEIR and used to identify appropriate avoidance, minimization, and mitigation measures in the DEIR.

Desert tortoise (*Gopherus agassizii*)

The proposed Project occurs within the range of desert tortoise, a federally listed threatened species and a species designated as endangered pursuant to CESA. The Project has the potential to result in permanent and temporary loss, degradation and impacts to desert tortoise and desert

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tortoise habitat. CDFW recommends the County complete protocol level surveys over all areas (i.e., 100 percent coverage) proposed to be directly or indirectly affected by the Project, using qualified biologists and following the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology (United States Fish and Wildlife Service, 2019). To reduce the likelihood of nonconcurrence with proposed surveys, methodology, and qualifications of biologists, CDFW recommends working with the USFWS and CDFW concurrently to ensure a consistent and adequate approach.

If desert tortoises are found within the Project area during surveys or construction activities, and complete avoidance is not possible, CDFW strongly recommends the County acquire a CESA ITP prior to any vegetation- or ground-disturbing activities. Any take of desert tortoise without take authorization would be a violation of Fish and Game Code section 2080.

Mohave Ground Squirrel (*Xerospermophilus mohavensis*)

The proposed Project occurs within the range of Mohave ground squirrel, a threatened species pursuant to CESA. The Project has the potential to result in permanent and temporary loss, degradation and impacts to Mohave ground squirrel and Mohave ground squirrel habitat. CDFW recommends the County conduct surveys consistent with the 2023 CDFW Mohave Ground Squirrel Survey Guidelines over all areas (i.e., 100 percent coverage) proposed to be directly or indirectly affected by the Project using qualified biologists (California Department of Fish and Wildlife, 2023).

If Mohave ground squirrel is found within the Project area during surveys or construction activities, and complete avoidance is not possible CDFW strongly recommends the County acquire a CESA ITP prior to any vegetation- or ground-disturbing activities. Any take of Mohave ground squirrel without take authorization would be a violation of Fish and Game Code section 2080.

Crotch's bumble bee (*Bombus crotchii*)

The proposed Project occurs within the range of Crotch's bumble bee, a candidate species pursuant to CESA. The Project has the potential to result in permanent and temporary loss, degradation and impacts to Crotch's bumble bee habitat. CDFW recommends the County conduct surveys consistent with the 2023 CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species over all areas (i.e., 100 percent coverage) proposed to be directly or indirectly affected by the Project using qualified biologists (California Department of Fish and Wildlife, 2023).

If Crotch's bumble bee is found within the Project area during surveys or construction activities, and complete avoidance is not possible CDFW strongly recommends the County acquires a CESA ITP prior to any vegetation- or ground-disturbing activities. Any take of Crotch's bumble bee without authorization would be a violation of Fish and Game Code section 2080.

Western Joshua tree (*Yucca brevifolia*)

The proposed Project occurs within the range of western Joshua tree, a candidate species pursuant to CESA. The Project has the potential to result in permanent and temporary loss, degradation, and impacts to western Joshua tree habitat. If complete avoidance of western Joshua trees during

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construction is not possible and the Project would require onsite western Joshua trees to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an ITP from CDFW under Section §2081b of CESA, or any other appropriate take authorization under CESA or under the Western Joshua Tree Conservation Act (Fish & G. Code, §§ 1927-1927.12), prior to the relocation, removal, or take. Any take of western Joshua trees without take authorization would be a violation of Fish and Game Code section 2080.

Special status bats

The proposed Project occurs within the range of Townsend's big-eared bat (*Corynorhinus townsendii*) and Pallid bat (*Antrozous pallidus*), both of which are CSSC. CDFW recommends the County conduct surveys for bats during the spring for any maternity roosts in the abandoned single-family ranch house. If bats are found, they should be excluded in the fall prior to demolition, and the results of the surveys be included in the DEIR. If any bats or sign thereof is found, or have the potential to occupy the Project site, CDFW recommends the County incorporate species-specific avoidance, minimization, and mitigation measures into the DEIR. Measures should include pre-construction bat surveys (i.e. daytime inspection, roosting habitat assessment, and emergence surveys) prior to Project initiation.

Desert kit fox (*Vulpes macrotis*)

The proposed Project occurs within the range of desert kit fox, a protected species pursuant to Title 14 of the California Code of Regulations section 460, which prohibits take of the species at any time. CDFW recommends the County conduct surveys over all areas proposed to be directly or indirectly affected by the Project to determine presence/absence and numbers of desert kit fox, and that this information be included in the DEIR. If desert kit fox or sign thereof is found, or if desert kit fox has the potential to occupy the Project site, CDFW recommends the County incorporate species-specific avoidance, minimization, and mitigation measures into the DEIR. Measures should include a pre-construction survey for desert kit fox 14 to 21 days prior to Project initiation.

Owens Valley vole (*Microtus californicus*)

The proposed Project occurs within the range of Owens Valley vole, a CSSC. CDFW recommends the County conduct a habitat assessment for Owens Valley vole in areas proposed to be directly or indirectly affected by the Project and that the results of the surveys be included in the DEIR. If Owens Valley vole or sign (burrows, runways, scat, etc.) thereof is found, or have the potential to occupy the Project site, CDFW recommends the County incorporate species-specific avoidance, minimization, and mitigation measures into the DEIR. Measures should include a pre-construction field survey for Owens Valley vole, which can resemble survey protocols for common microtine species such as California voles.

American badger (*Taxidea taxus*)

The proposed Project occurs within the range of American badger, a CSSC. CDFW recommends the County completes surveys for American badger in areas proposed to be directly or indirectly affected by the Project and that the results of the surveys be included in the DEIR. If American badger or sign thereof is found, or have the potential to occupy the Project site, CDFW recommends

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the County incorporate species-specific, avoidance, minimization, and mitigation measures into the DEIR. Measures should include a pre-construction survey for American badger 14 to 21 days prior to Project initiation.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, groundwater dependent ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. A discussion of potential direct and indirect impact to Groundwater Dependent Ecosystems (GDE) and Interconnected Surface Waters (ISW). CDFW considers groundwater dependent ecosystems² and interconnected surface waters to be potentially susceptible to the Project's groundwater extraction demand. GDEs and ISWs can be identified as vegetation or wetland natural communities commonly associated with groundwater or surface waters that originate at springs, which are datasets provided online by the Department of Water Resources (DWR) as starting points that can be used to assess potential impacts (California Department of Water Resources, 2026). Water table drawdowns caused by the new production well may cause a change in vegetation, as historically observed on LADWP-owned lands of Owens Valley, which could impact foraging habitat for prey base with which it is associated.

Impacts from groundwater pumping may extend beyond the project boundaries. Undesirable results from groundwater pumping in the Owens Valley groundwater basin may include lowering of groundwater levels, reduced aquifer storage, and depletion of interconnected surface waters (ISW). Lowering of groundwater levels may have direct impacts in the vicinity of the production well, and

² Groundwater dependent ecosystem refers to ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface. (23 Cal. Code Regs. § 351(m))

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cumulative impacts additive to existing groundwater pumping in the basin. The lowering of groundwater levels will change local groundwater gradients which may result in decreased flows from upgradient and downgradient springs and other water bodies. Impacts from groundwater pumping may be seasonal as well as long-term, and undesirable results may be exacerbated in dry years. The NOP states that peak water demand by the project will occur during the summer, which coincides with the typical period that groundwater levels are seasonally decreasing. Due to the potential impacts on groundwater resources and GDE, the DEIR should include an assessment of the impacts that are anticipated to occur as a result of operations of the production well.

To assess these impacts, the DEIR should include a review of the local hydrogeology, including identification of confining, semi-confining, and aquifer layers. This review should extend spatially to areas that contain GDE and ISW that may be impacted by operating the production well. The hydrogeologic review should have sufficient detail to determine the hydrogeologic structure(s) into which the production well will be installed and screened, and sufficient detail to estimate aquifer parameters as necessary to utilize analytical solutions to estimate drawdown and stream depletion extending out to the GDE and ISW that could be impacted by operating the production well. An evaluation of impacts resulting from the groundwater pumping should include both seasonal and long-term considerations. The long-term evaluation period should extend out to the expected life of the production well operations. The evaluation of seasonal impacts should consider the actual anticipated monthly pumping operations rather than a year-round average pumping rate. Both the long-term and seasonal evaluations should factor in the potential for extended periods of drought.

Effective monitoring methods and systems can aid in understanding groundwater extraction impacts to GDEs and ISWs and informing subsequent action. Effective monitoring systems that can be used to evaluate impacts to GDEs and ISW include nested piezometers, geochemical and physical property monitoring, and analytical and numerical modeling (California Department of Fish and Wildlife, 2019). Well logs and monitoring well data should be uploaded to the DWR Sustainable Groundwater Management Act (SGMA) Data Viewer. The DEIR should identify GDEs and ISW that are expected to be impacted as a result of groundwater pumping by the proposed production well's radius of influence and describe how the lead agency will assess groundwater pumping impacts and establish protective thresholds for these GDEs and ISW and associated sensitive resources should impacts occur.

4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies, and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, groundwater dependent ecosystems, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project

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that are potentially feasible, would “feasibly attain most of the basic objectives of the Project,” and would avoid or substantially lessen any of the Project’s significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a “no project” alternative (CEQA Guidelines § 15126.6[e]).

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The Lead Agency should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time (with the exception of certain projects set forth in SB 147, which was passed on July 10, 2023). Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.

Sensitive Plant Communities: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.

2. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: American badger, loggerhead shrike, Owens Valley Vole, pallid bat, and Townsend’s big-eared bat
3. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

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The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. County of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

4. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act, as amended (16 U.S.C. § 703 et seq.).

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

5. *Moving out of Harm's Way*: To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed

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from Project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

6. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

Lake and Streambed Alteration Program

Based on review of material submitted with the NOP and review of aerial photography, several ephemeral streams traverse through the Project area. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream, or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

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CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Native Landscaping

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California tree and shrub species for hydroseed erosion control planting and screening along the western boundary of the water bottling facility; and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE: <https://calscape.org/>. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <https://saveourwater.com/>.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). Information can be submitted online or via completion of the CNDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDB/Submitting-Data>. The types of information reported to CNDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Crystal Geyser Roxane Grant Ranch Project (SCH No. 2026011104) and recommends that the Inyo County address the CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to Bryant Luu, Environmental Scientist, by email at Bryant.Luu@wildlife.ca.gov or by phone at (760) 923-8666.

Sincerely,

DocuSigned by:

84FBB8273E4C480...

Alisa Ellsworth
Environmental Program Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

Graham Meese, Senior Environmental Scientist Supervisor
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NATIVE AMERICAN HERITAGE COMMISSION

February 2, 2026

Cathreen Richards
168 N. Edwards Street
PO Drawer L
Independence CA 93526

Re: 2026011104 Crystal Geyser Roxane Grant Ranch Project, Inyo County

To Whom It May Concern:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.AB 52

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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Melina.Carlos@NAHC.ca.gov.

Sincerely,

Melina Carlos

Melina Carlos
Cultural Resources Analyst

cc: State Clearinghouse

Lone Pine Paiute-Shoshone Reservation

P.O. Box 747 • 975 Teya Road

Lone Pine, CA 93545

(760) 876-1034

Fax (760) 876-8302

Web Site: www.lppsr.org

February 23, 2026

Inyo County Planning Department
168 North Edwards Street
PO Box L
Independence, CA 93526

Re: Crysal Geyser Roxane Grant Ranch Project Environmental Impact Report

Dear Planning Director Richards:

The Lone Pine Paiute-Shoshone Reservation (LPPSR) appreciates the opportunity to comment on the Crysal Geyser Roxane Grant Ranch Project Environmental Impact Report and has the following comments:

Initial Study. The renderings of buildings do not include external light fixtures, night-time views, nor views from the roads and residences. Also, at 40 employees and 40 big rig trucks per day, the renderings are simplified and disingenuous at best.

Page 2, paragraph 10. These bottling lines are described as flavored and mineral water. This is noted as a soft drink factory due to additives such as minerals, flavorings (possibly colorings), and CO2. USFDA should be listed here.

Page 5, Access, Circulation, Parking. These numbers do not match the renderings. Parking, turn-around, and the number of spaces is disingenuously shown as a much smaller and cleaner build. No rendering is better than deceptive renderings.

Only 1 EV station serving 2 vehicles is not enough to encourage employees who must commute in all weather, all hours for long distances. Unless these are DC fast chargers, 2 slow chargers are not enough. Employers do not have to make energy free to employees, but they should provide access. Inyo County has been slow to support EV's and air quality.

Page 6, Process Wastewater. It should be noted that additives will be in the bottling process. How are these handled if wastewater is left to evaporate and seep into the soil?

Page 7, Lighting. "...to include exterior security lighting to illuminate the loading dock area, building entrances, parking lot, fire pump building, and the well house." This is a lot of lights and through 3 shifts. Directed downwards is not enough. Residents and traffic horizontally below these lights will experience high levels of light trespass. All lighting needs to be fully shielded from illuminating areas not on the highways or outside Grant Ranch properties. CalTrans and CHP need to participate in any outdoor lighting designs at this location. Stray lighting off premises is wasteful, inefficient, damaging to wildlife, hazardous to drivers, unhealthy and diminishes some of the last dark skies in California.

Page 8, paragraph 2.6 Agencies. Add Owens Valley Groundwater Authority (OVGA). This is no longer a de minimis well operation.

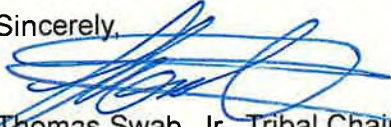
Page 10, paragraph 3.0 table. LPPSR agrees with all the elements designated potentially significant impacts, with the exception of solid waste. This industry is nearly 100% water and plastic. The product container is plastic; the packaging is plastic and the enormous amount of wrapping for transport is plastic. Flavored and mineralized drinks will likely be half liter or smaller, therefore using more plastic.

General comments: Unnecessary industrialization of open space. There is no way to camouflage the buildings and trucks because it sits in a tight space between highways 396 and 190. Most of the population of Olancho will be disturbed by the 40 big rig trucks entering and exiting over 3 shifts each day (this is actually 80 truck-runs per day: 40 in and 40 out). Lighting, noise, and traffic from a 24-hour operation will be substantial. As noted in a prior comment, the Owens Valley Groundwater Authority (OVGA) should address the un-registered de minimis well and in addition, the Inyo County Water Department (ICWD) should be listed as a regulatory agency in this document.

The final issue not addressed is the addition of mineralization and flavoring and possible carbonization of the water. The water source is not natively mineralized; therefore, this is not simply a water bottling plant like the Cartago site. There is no mention of these processes, control of the processes or the processes or delivery/storage of mineral additives, concentrated flavors/dyes, and CO2 containers. The USFDA has definitions of bottled water types, the proposed facility will be a soft drink factory.

Once again, the Lone Pine Paiute-Shoshone Reservation appreciates the opportunity to comment on the Cystal Geyser Roxane Grant Ranch Project Environmental Impact.

Sincerely,



Thomas Swab, Jr., Tribal Chairman
Lone Pine Paiute-Shoshone Reservation

Cc: William Wadleton, Inyo County 5th District Supervisor
Paul Huetten, Inyo County Water Commission Chairperson
Holly Alpert, Inyo County Water Department Director

From: Lisa van Casteren <lisavcasteren@gmail.com>

Sent: Tuesday, February 24, 2026 2:10 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from lisavcasteren@gmail.com. [Learn why this is important](#)

Good afternoon,

As a big lover of the Inyo area, I feel compelled to express my concern for the impact a new groundwater production well will have on the health of the local ecosystem. Please further analyze and investigate the cumulative impacts of these operations in addition to existing ones, to ensure local communities and ecosystems not only remain intact, but can flourish.

This area is dear to my heart, as I hope it will be for all generations to come.

Kind regards,

Elisabeth van Casteren

From: Charlene Daniels <cdaniels2525@yahoo.com>

Sent: Monday, February 23, 2026 6:47 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from cdaniels2525@yahoo.com. [Learn why this is important](#)

Hi

I am very concerned about this project. Why is the government considering a water extraction project in the desert for anything that is not an emergency. Look at what Las Vegas has done to rural areas in Nevada by destroying their ecosystems with the unsustainable removal of water. The impacts of this project on the surrounding area need to be thoroughly analyzed to ensure that the area below this site continues to receive adequate water.

Charlene Daniels

[Yahoo Mail: Search, Organize, Conquer](#)

From: David Herbst <herbst@ucsb.edu> On Behalf Of David Herbst
Sent: Monday, February 23, 2026 10:22 AM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

[You don't often get email from herbst@lifesci.ucsb.edu. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwlFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=ksPFF1oC5VjeIUM90cF8UaybuLg942ULIP7p34IjOAZFDtNzD_nGAuyLEKy2M2h3&s=kxBXxAnxy-V9QyzVBI49nSvdB4ICjSmggCRICmDV_Mw&e=]

There are critical spring habitats around the margins of the Owens Lake playa. Pumping groundwater, as proposed in expanding withdrawals by Crystal geyser threatens these habitats. As Owens lake recovers and goes through cycles of wet and dry periods these spring and seep habitats are crucial refuge for aquatic life that supports the birds that visit the recovering lake. This project would undermine that ecological service. On these scientific ground I urge the county to deny this permit.

respectfully

David Herbst

--

David Herbst, PhD
Sierra Nevada Streams and Great Basin Salt Lakes Sierra Nevada Aquatic Research Lab UC Santa Barbara and University of California, Santa Cruz Institute of Marine Sciences

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and Sierra Streams Institute

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Nevada City CA
(760) 258-6066

WEB: https://urldefense.proofpoint.com/v2/url?u=http-3A_herbstlab.msi.ucsb.edu&d=DwlFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=ksPFF1oC5VjeIUM90cF8UaybuLg942ULIP7p34IjOAZFDtNzD_nGAuyLEKy2M2h3&s=Wnj-OUZbNc9FgXOGV01k3Zyw798LOYfHyeNEz-ixFgA&e=

-----Original Message-----

From: Anna Montgomery <annamontgomery391@gmail.com>

Sent: Wednesday, February 25, 2026 10:25 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser additional water business expansion

[You don't often get email from annamontgomery391@gmail.com. Learn why this is important at [Hello,](https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwlFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=oer8tYlwPIP1eM4up3zCPcocyonJrFtKLHqevBOuwQe6wvNHnhUs3z00LdIA8BN7&s=r9Yf8AslfDAGFfx0M6db-hrHVttgFvcsWoW0Htk4-eQ&e=]</p></div><div data-bbox=)

I am a resident of Lone Pine, CA (391 W Bush Street) and am very concerned to hear Crystal Geyser is requesting a permit to expand their operations in Olancho. Crystal Geyser is one of the largest exporters of water from Inyo County. Due to the fact that the Owens Valley has suffered from decades of groundwater extraction from LADWP, I am concerned about the additional wells and up to 510,000 gallons per day that Crystal Geyser wants to extract from the valley. I feel strongly that this is not a sound decision for the health and well being of the residents, and ecosystem, of the Owens Valley. Please deny this permit request and prevent further devastation to our precious ecosystem.

The Owens Valley is a gateway to the Eastern Sierra, and we need to protect our water resources to the best of our ability for the sake of residents, tourists, and future generations. The water resources of our valley are tapped more than is reasonable at this point, and this will only make things worse.

Thank you for your consideration,

Anna Montgomery
phone 360-220-1400

From: Luca Morellato <luca.morellato@gmail.com>

Sent: Monday, February 23, 2026 6:54 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from luca.morellato@gmail.com. [Learn why this is important](#)

Hello,

Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP. Every year I see water levels change and fluctuate and it's is overwhelmingly clear we are going TOO much extraction.

The local aquifer needs help to rest so it can continue to provide for the entire ecosystem. More environmental reports needs to be done.

I look forward to a renewed and more thorough approach to water extraction in Inyo county

Luca Morellato

From: Wes Mitchell <wesm@dancingtrout.net>

Sent: Monday, February 23, 2026 1:21 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

[You don't often get email from wesm@dancingtrout.net. Learn why this is important at

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[3A_aka.ms_LearnAboutSenderIdentification&d=DwlFAG&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=GyK0XVmdwLWyXOb8kH9z432KESy8DnYmCKXs6eZSG36b7qFAA6nnJy9H1GYdPuaW&s=16ZW7BgDtyJp64CvSPaJXNvsitCPkbEyOh1grVEu7GU&e=](https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwlFAG&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=GyK0XVmdwLWyXOb8kH9z432KESy8DnYmCKXs6eZSG36b7qFAA6nnJy9H1GYdPuaW&s=16ZW7BgDtyJp64CvSPaJXNvsitCPkbEyOh1grVEu7GU&e=)]

NO

Look at the Texas Panhandle where they're pumping all the groundwater out for irrigation. Look at the Central Valley just over the hill. The land there is SINKING.

Dr. Wesley E. Mitchell

San Diego.

From: Rich Moser <rich@transcendentalastrology.com>

Sent: Monday, February 23, 2026 3:57 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from rich@transcendentalastrology.com. [Learn why this is important](#)

I grew up in Ridgecrest, and I consider the Owens Valley and eastern High Sierra my backyard.

I've watched the changes in Owens Lake for decades, and I don't think it can handle another big groundwater suck. Please support restoring the lake first and then think about business possibilities later.

Rich Moser

rich@transcendentalastrology.com

(805) 845-4805

(no texts)

From: Izzy Taylor <izzymt.14@gmail.com>
Sent: Monday, February 23, 2026 9:40 AM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Plant

You don't often get email from izzymt.14@gmail.com. [Learn why this is important](#)

Hello,

I'm writing to express concern over the new Crystal Geyser plant. Water extraction is already a huge concern and negative impact on our community and lands in the Owens Valley and we really shouldn't be considering extracting more water. Any EIR *needs* to take into account the existing state/rate of water extraction by the LADWP to be considered accurate and comprehensive. The tribes of the Owens Valley should also be heavily involved and consulted throughout this process.

Thank you,

--

Isabel Taylor
(978) 621-0927
izzymt.14@gmail.com

From: Leah K Brown <leahkaybrown@gmail.com>

Sent: Monday, February 23, 2026 8:13 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from leahkaybrown@gmail.com. [Learn why this is important](#)

Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP. Impacts from ground water removal further exacerbate the decline of the Owens Lake region and its fragile ecosystem.

- This impact and additional groundwater production well could be detrimental for the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping.
- The Environmental Impact Report should analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.
- I request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Best,
Leah Brown

Leah Brown
Sign Language Interpreter



I respectfully acknowledge that I live and work on the unceded ancestral territories of the indigenous peoples before me; I acknowledge the resilient and continued presence of the Northern Paiute/Nüümü

From: Paul Cooney <paulcooney@mac.com>

Sent: Tuesday, February 24, 2026 8:35 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

[You don't often get email from paulcooney@mac.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwlFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=hDxvJBEN7Oc4ks-nYcOnTEXoWYiNgM8qvGRLbdm5_Xe1s_VsrqoDPTE_KtII9q5b&s=mStzqRKIHsKD2MWzkaBNIIhAFwswiEY60lrcoXxJbIk&e=]

Ms. Richards,

I am writing to express my concern for the impact that an additional groundwater production well could have on the health of the Owens Valley aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping. I request that the Environmental Impact Report analyze the cumulative impacts that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP. I also request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Respectfully,
Paul Cooney
6464 Brookview Circle
Reno, NV
89519

From: Nancy Boley Cruz <tesscruz@usc.edu>

Sent: Friday, February 27, 2026 1:03 PM

To: Cathreen Richards <crichards@inyocounty.us>

Cc: Jon Cruz <cruz@soc.ucsb.edu>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from tesscruz@usc.edu. [Learn why this is important](#)

I am a homeowner in Aspendell, CA, outside Bishop. As such, I oppose Crystal Geyser's attempt to exploit our natural resources for profit. Our aquifers have already been stripped by LADWP, turning the once verdant Owens Valley into a desert environment. It affects public use of our valley and Sierra lands, and the possible future destruction of those ecosystems.

I ask that the environmental report analyze the cumulative impacts from the current and potential future extraction of water by Crystal Geyser.

Additionally, Inyo County needs to involve Owens Valley tribal groups early and often regarding any changes in water use. They will be directly impacted, and serve an essential role in protecting the Owens Valley environment.

Sincerely,

N. Tess Boley Cruz
280 Cataract Rd
Aspendell, CA 93514
Tesscruz@usc.edu

N. Tess Boley Cruz

From: Kristine Dyck <kristine.wulff@gmail.com>

Sent: Monday, February 23, 2026 6:37 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from kristine.wulff@gmail.com. [Learn why this is important](#)

To the Inyo County Planning Department and Board of Supervisors,

I am writing to express my deep concern regarding the continued, large-scale exportation of water from Inyo County by Crystal Geyser (CG Roxane).

As someone who cares deeply about the Eastern Sierra, I am alarmed that a commercial bottled water company is extracting massive amounts of groundwater from the same watershed that has already suffered decades of depletion by LADWP.

My specific concerns, which I request be addressed in the Environmental Impact Report (EIR), are:

- **Impact of Additional Extraction:** The proposed, or potential, additional groundwater production wells represent an unacceptable risk to the local aquifer. The aquifer is already under severe stress. Adding more extraction puts local drinking water supplies and the health of the groundwater-dependent ecosystems, such as our shrinking wetlands and meadows, in jeopardy.
- **Cumulative Impacts of Pumping:** The EIR must analyze the *cumulative* impact of Crystal Geyser's operations alongside the ongoing, massive extraction by LADWP. We are already dealing with the consequences of decades of over-pumping, including sinking land (subsidence). It is unsustainable to add another industrial-scale user to this ecosystem.
- **Tribal Consultation and Cultural Heritage:** I request that Inyo County, as the lead agency, fulfill its obligations under Assembly Bill 52 by engaging in early and meaningful consultation with the Tribes of the Owens Valley. The groundwater feeds the springs, meadows, and culturally significant areas that are essential to the life and heritage of the Native people in this region.

Our community cannot afford to treat our precious groundwater as a disposable resource for commercial profit. I urge the county to prioritize the health of our environment, our local water security, and our tribal neighbors over increased export of our water.

Sincerely,

Kristine Dyck

From: Fichtel Light <fichtel_light@att.net>

Sent: Thursday, February 26, 2026 3:56 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

Importance: High

I want to express concern for the impact that additional groundwater production is likely to have on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping. The Environmental Impact Report should analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP. Inyo County, as the lead agency, must commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Thanks you.

Chris Fichtel

From: Ben Gerber <bgerb75@gmail.com>

Sent: Thursday, February 26, 2026 1:50 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

Dear Mr. Richards,

I am writing to express concern about the proposed Crystal Geyser production well near Olancho.

Owens Valley has already borne the impacts of extensive groundwater extraction for decades. The proposal to pump up to 410 acre-feet per year — up to 510,000 gallons per day — for bottled water export raises serious concerns about additional stress on an already impacted aquifer system.

I urge the Environmental Impact Report to carefully analyze cumulative impacts from both Crystal Geyser and LADWP groundwater operations, as well as impacts to groundwater-dependent ecosystems. I also ask that Inyo County commit to early and meaningful consultation with the Tribes of the Owens Valley pursuant to Assembly Bill 52.

Water in Owens Valley is not an unlimited resource. The long-term health of the aquifer and the landscape must be prioritized.

Thank you for your consideration.

Sincerely,

Ben Gerber

From: Samantha Del Giudice <samantha777delgiudice@gmail.com>
Sent: Monday, February 23, 2026 2:36 PM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from samantha777delgiudice@gmail.com. [Learn why this is important](#)

To Whom It May Concern,

I am writing to express serious concern regarding the proposal by Crystal Geyser Water Company to develop an additional groundwater production well near Olancho.

The Owens Valley is an arid and hydrologically sensitive region. Groundwater dependent ecosystems in this area, including native vegetation, wildlife habitat, springs, and seeps are already being affected by ongoing groundwater pumping. The addition of another production well raises significant concern about further lowering of the water table, potential long-term aquifer depletion, and irreversible ecological impacts.

I am particularly concerned about the cumulative impacts to the health of the local aquifer. Any Environmental Impact Report (EIR) must thoroughly analyze not only the direct effects of this proposed well, but also the cumulative impacts resulting from existing and reasonably foreseeable future groundwater extraction by Crystal Geyser and by the Los Angeles Department of Water and Power (LADWP). Owens Valley has a long history of groundwater export and management challenges, and cumulative drawdown must be rigorously evaluated using sound hydrological science and long-term monitoring data.

Inyo County, as the lead agency, has a responsibility to ensure that the EIR meaningfully evaluates:

Long-term aquifer sustainability and recharge rates

Impacts to groundwater-dependent ecosystems

Potential interference with nearby wells and springs

Risks of land subsidence

Cumulative basin-wide drawdown from all major pumping activities

Additionally, I respectfully request that Inyo County commit to early, ongoing, and meaningful consultation with the Tribes of the Owens Valley in order to fully comply with California Assembly Bill 52 (AB 52). Tribal cultural resources, traditional ecological knowledge, and ancestral ties to the land must be considered at the earliest stages of environmental review, not as an afterthought. Consultation should be conducted in good faith and integrated into project design and mitigation measures.

Finally, given Crystal Geyser's documented compliance and environmental violations at other facilities, including wastewater management and disposal concerns, it is essential that any approval include strict monitoring, enforceable mitigation measures, and full transparency to the public.

The long-term health of the Owens Valley aquifer and its ecosystems must take precedence over expanded commercial extraction. Once groundwater-dependent ecosystems are damaged, restoration is extremely difficult, if not impossible.

Thank you for your careful consideration of these concerns.

From: Leo Jacobsen <jmjacobsen0@gmail.com>
Sent: Friday, February 27, 2026 4:59 PM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Project

Hello,

I hope you're having a good week. I'd like to comment on the Crystal Geyser Roxane Grant Project's upcoming EIR.

I have a few concerns about this project that I hope Inyo County will ensure are included in the EIR. Groundwater is a crucial and limited resource in Owens Valley, and I hope the EIR appropriately analyzes the impacts on vegetation in all possible areas that the groundwater loss would impact. I also hope the EIR considers the cumulative effects of this project combined with previous projects done in the area related to both groundwater and direct habitat loss. Please also begin consulting with local tribes as soon as possible to ensure their complete involvement in this process.

Thank you,
Leo

--

Leo "Jake" Jacobsen
(415) 314-9105
jmjacobsen0@gmail.com

-----Original Message-----

From: Jane Mcdonald <janemcd1@mac.com>

Sent: Wednesday, February 25, 2026 7:55 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal+Geyser+Roxane+Grant+Ranch+Project+Environmental+Impact+Report

[You don't often get email from janemcd1@mac.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwlFag&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpqnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=U5TOcK3xxmkkVvOpVzMQvL8zPKil_oifi2-4vXOvWPg2KozJc2tS4pOqFHxMXn4z&s=-Q6Zh7zLs2V7Of01pOI29UHeF7xInb5dyr_q1DbdrTo&e=]

Hi Cathreen,

In my opinion enough is enough on the resource extraction for private sector profiteering. South county already suffers too much from the groundwater extraction done by DWP and Crystal Geyser. I am concerned about our plants, and also the need to consult in ongoing responsive dialogue with the tribes.

Jane McDonald

Independence

From: Les Perpall <lesperpall@yahoo.com>

Sent: Monday, February 23, 2026 2:47 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from lesperpall@yahoo.com. [Learn why this is important](#)

To Whom it May Concern;

Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP. Given the recent and past history of water issues in Inyo County, particularly at Owens Lake, I find it deeply troubling that Inyo County would even consider issuing a permit for a project of this magnitude. Owens (now dry) Lake is a fragile environment, and pulling more water from the area will do nothing but line the pockets of corporate executives at the expense of the health, environment, and future of Inyo County residents and visitors.

If this pursuit continues, a thorough environmental impact study should be done to analyze the cumulative impacts that could result from groundwater extraction by Crystal Geyser and/or LADWP. Inyo County, as the lead agency, should commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Please take this project as a serious matter for the residents and visitors of Inyo County.

Respectfully submitted,
Lester Perpall

From: Jan Rhoades <delasmontanas@yahoo.com>
Sent: Monday, February 23, 2026 9:07 AM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from delasmontanas@yahoo.com. [Learn why this is important](#)

To Whom it May Concern:

I have lived in the Owens Valley for 45 years. I know that Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP. I feel deeply moved to express the following concerns and requests regarding this topic:

- I am concerned about the impact that an additional groundwater production well could have on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping.
- I request that the Environmental Impact Report analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.
- I request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Jan Rhoades
delasmontanas@yahoo.com

"... if one advances confidently in the direction of his dreams, and endeavors to live the life which he has imagined, he will meet with a success unexpected in common hours."

Henry David Thoreau

Have courage for the great sorrows of life and patience for the small ones, and when you have laboriously accomplished your daily tasks, go to sleep in peace -- God is awake.

Victor Hugo

From: Signe Swenson <signeswenson@icloud.com>

Sent: Monday, February 23, 2026 8:58 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from signeswenson@icloud.com. [Learn why this is important](#)

To Whom It May Concern,

Having once lived in the Owens Valley, and seen first hand sagebrush go from being green to grey (dead) due to ground water being pumped, I am concerned for the impact that an additional groundwater production well could have on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping.

I would like to request that the Environmental Impact Report analyze the cumulative impacts that could result from current and future groundwater extraction by both Crystal Geyser and the operations of the LADWP.

I would also like to request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Thank you for your attention to this matter,
Signe Swenson

From: markchotiner@mac.com <markchotiner@mac.com>

Sent: Monday, February 23, 2026 9:04 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

[You don't often get email from markchotiner@mac.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwlFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=WJ7hZEvSa2bnExOhY-cL-PcYKI4BH3Rcgs8RIN2BJuVkOi3kRYpmnamXmOHGG72a&s=_5jG9Zq_61I3LWJOSCP2UeGDIajzPZDNX9BQANhDraE&e=]

Dear Ms. Richards,

I am writing in regard to the proposed building of a new water bottling facility in Olancho by Crystal Geyser.

I am firmly against this project. The land where the proposed project will take place has already suffered decades of groundwater extraction by LADWP. It cannot withstand any more extraction! An additional groundwater production well could have a detrimental effects on the wellbeing of the local aquifer, as well as the surrounding ecosystems that have already been affected by groundwater pumping.

I am asking that the Environmental Impact Report analyze the cumulative impacts that could result from current and future groundwater extraction by both Crystal Geyser and LADWP's operations.

I am also asking that Inyo County immediately commit to frequent consultation with the Tribes of the Owens Valley to fulfill the County's obligations under Assembly Bill 52.

This proposed expanded water extraction is unnecessary, and potentially dangerous to an area that has already suffered enough damage from decades of extraction. Please ensure that due diligence is done before giving any kind of green light to this project.

Regards,

Mark Chotiner

From: Steve Lustgarden <slustgarden@gmail.com>

Sent: Monday, February 23, 2026 6:00 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from slustgarden@gmail.com. [Learn why this is important](#)

Hello,

Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP.

I am deeply concerned that an additional groundwater production well could have huge negative impacts on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping. \

I request that the Environmental Impact Report analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.

I request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Thank you,

Steve Lustgarden

From: Natasha Sevilla <natasha.sevilla@gmail.com>
Sent: Tuesday, February 24, 2026 6:26 AM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from natasha.sevilla@gmail.com. [Learn why this is important](#)

Dear C. Richards,

Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP.

I am expressing my concern for the impact that an additional groundwater production well could have on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping.

I request that the Environmental Impact Report analyze the cumulative impacts that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.

I request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Respectfully,
Toni Sevilla
Bishop, CA

From: Sandra Zelasko <slzphoto@sbcglobal.net>

Sent: Monday, February 23, 2026 10:08 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from slzphoto@sbcglobal.net. [Learn why this is important](#)

I have grave concerns for the impact that an additional groundwater production well could have on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping.

KEEP MONO COUNTY WATER IN MONO COUNTY!

The Environmental Impact Report analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.

GROUND WATER EXTRACTION IS NOT SUSTAINABLE!

Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

THE RIGHT THING TO DO!

Sincerely,

Sandy Zelasko

From: Constance Spenger <cespenger@gmail.com>
Sent: Monday, February 23, 2026 6:10 PM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from cespenger@gmail.com. [Learn why this is important](#)

Dear C. Richards:

I have the following comments on the Crystal Geyser Roxane Grant Ranch Project EIR:
Effects of groundwater pumping on the vegetation of the Owens Valley are already significant. Further groundwater pumping can only be harmful.

Cumulative effects of the Project and LADWP groundwater pumping must be addressed in the EIR.

Inyo County, as the lead agency, must commit to early and frequent consultations with the Tribes of the Owens Valley as required under Assembly Bill 52.

Yours truly,

Constance Spenger
115 Elmcrest Drive
Big Pine, CA 93513

From: Mary Ann Sullivan <maryann.sullivan@gmail.com>

Sent: Monday, February 23, 2026 7:13 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from maryann.sullivan@gmail.com. [Learn why this is important](#)

As a concerned resident, I am writing to voice my strong opposition to the proposed expansion of Crystal Geyser's operations. Our land in Inyo County has already been fundamentally altered by decades of groundwater extraction at the hands of the LADWP, and we cannot afford to treat our water as an infinite export. On a personal level, I am deeply concerned about the long-term viability of our valley; I have watched the water table drop and the landscape dry out, and I fear that further extraction will irreparably damage the local springs and meadows that define our home. I specifically urge you to consider the health of our local aquifer and the groundwater-dependent ecosystems that are currently clinging to survival.

Furthermore, it is vital that the upcoming Environmental Impact Report (EIR) adopts a comprehensive scope. I request that the EIR strictly analyze the **cumulative impacts** resulting from the combined extraction efforts of both Crystal Geyser and the LADWP, rather than viewing this project in isolation. Additionally, Inyo County must uphold its legal and moral obligations under **Assembly Bill 52**. I request that the County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley. Meaningful collaboration with the original stewards of this land is the only way to ensure a just and sustainable future for our water resources.

Sincerely,

Mary Ann Sullivan

Mammoth Lakes, CA

From: Signe Swenson <signeswenson@icloud.com>

Sent: Monday, February 23, 2026 8:58 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from signeswenson@icloud.com. [Learn why this is important](#)

To Whom It May Concern,

Having once lived in the Owens Valley, and seen first hand sagebrush go from being green to grey (dead) due to ground water being pumped, I am concerned for the impact that an additional groundwater production well could have on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping.

I would like to request that the Environmental Impact Report analyze the cumulative impacts that could result from current and future groundwater extraction by both Crystal Geyser and the operations of the LADWP.

I would also like to request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Thank you for your attention to this matter,
Signe Swenson

From: Jennifer Bruursema <jbruursema@me.com>
Sent: Monday, February 23, 2026 9:46 AM
To: Cathreen Richards <crichards@inyocounty.us>
Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from jbruursema@me.com. [Learn why this is important](#)

Dear Ms. Richards,

I am writing to submit public comment regarding the proposed Crystal Geyser Roxane Grant Ranch Project and the upcoming Environmental Impact Report.

As someone who deeply loves the Eastern Sierra and spends significant time climbing, hiking, and exploring throughout the Owens Valley, I am very concerned about additional groundwater extraction in this already overburdened landscape. The open space, stark beauty, the climbing routes, the wind across the valley floor, the quiet of the high desert, these are part of what make this region extraordinary and worth protecting.

Owens Valley has already endured decades of groundwater extraction, most notably by LADWP. The cumulative impacts of historic and ongoing pumping are visible in dust, vegetation loss, and ecological stress. The proposal to extract up to 410 acre-feet per year, i.e. up to 510K gallons per day, raises serious concerns about further degradation of the aquifer and groundwater-dependent ecosystems.

I respectfully request that the Environmental Impact Report:

1. Fully analyze cumulative impacts from both existing groundwater extraction and foreseeable future extraction, including LADWP operations and any other regional groundwater users.
2. Evaluate impacts to groundwater-dependent ecosystems, springs, seeps, native vegetation, wildlife habitat, and cultural resources.
3. Include a robust range of alternatives, including a reduced pumping alternative and a no-project alternative.
4. Commit to early, meaningful, and ongoing consultation with Tribes of the Owens Valley in compliance with AB 52.

Water in the Owens Valley is not surplus. It is the foundation of the valley's ecological health, cultural history, and recreational landscape. Exporting additional water in single-use plastic bottles, transported by dozens of trucks per day, feels fundamentally misaligned with the long-term stewardship this place requires.

The Eastern Sierra is a rare and irreplaceable landscape. It deserves protection from further industrial-scale extraction.

Thank you for considering my comments.

Sincerely,

Jennifer Bruursema

San Francisco, CA

From: Craig Brestrup <cbrestrup@gmail.com>

Sent: Monday, February 23, 2026 5:32 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from cbrestrup@gmail.com. [Learn why this is important](#)

I write as one who has lived near this project (Ridgecrest) and who, though now living on the coast, still visits and camps frequently in the area. Considering that Los Angeles has already drained a large part of the region's water, it's hard to imagine why anyone but a corporation would consider it good to take more water out, especially for what are usually the trivial uses to which bottled water are put. Mostly it's an affectation or convenience, rarely a substitute for unhealthful tap water, and it doesn't only send good water beyond where it will be needed but does so in millions of plastic bottles, which have their own undesirable effects. Who is this project good for? Who will it hurt? I hope the authorities responsible for deciding about this give it a deeply skeptical examination and then turn it down.

Thank you.

Craig Brestrup, PHD

Gualala, CA

From: Patricia Puterbaugh <pmputerbaugh@yahoo.com>

Sent: Monday, February 23, 2026 7:50 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from pmputerbaugh@yahoo.com. [Learn why this is important](#)

I opposed the plan for an expansion or new well by the crystal geyser company in the Owens Valley. The Owens Valley has been Wasted and changed from each origins due to the over extraction of water by various entities.

The tribes of the Owens Valley have been abused by this extortion.

The idea that a bottled water giant corporation is still even functioning or expanding in California is ludicrous. We are a try, dry state. This water under the Owens valley is thousands and thousands and thousands of years old. We have nothing to waste.

Especially to be put into plastic bottles and shipped out of the region. We all know we should not be using water in plastic bottles ever. Much less from an over used aquifer under an ancient valley.

We often recreate in this area and are very opposed to this plan. Thank you sincerely
Patricia Puterbaugh.

[Sent from Yahoo Mail for iPhone](#)

From: Blair Huizingh <blair.huizingh@gmail.com>

Sent: Wednesday, February 25, 2026 9:18 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

I am writing in opposition to the proposed expansion of the Crystal Geyser facility. From what I understand the water is processed the same as any water source before delivery to consumers. Taking water from "Olancho Peak" is merely a gimmick; it provides a product no different than that taken from anywhere else while harming the flora and fauna of the Owens Valley. Knowing that water is put into plastic bottles, most of which go to landfills makes the project even more appalling.

For decades, the people of Owens Valley have fought to reclaim their water from LADWP, and the expansion of the water treatment facility in Los Angeles offers a glimmer of hope. It would be a shame to give those gains away.

Sincerely,

Blair Huizingh

Mammoth Lakes, CA

From: Jim Mahoney <jrmfinfree@aol.com>

Sent: Monday, February 23, 2026 10:33 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from jrmfinfree@aol.com. [Learn why this is important](#)

Dear Sir or Madam - I am a Southern California resident with a home in Mono County so I am quite familiar with the changes in the Owebs Valley over the last 50 years. While I support commercial ventures generally, I believe the proposed project is too excessive in an already fragile Owen's Valley. The recent efforts to restore and revitalize Owen's Lake shows how important our water resources are in this area, whether they are surface waters or underground reservoirs. 2.5 million bottles (750ml) a day will harm the ecosystem and divert precious water resources away from the Valley.

Please vote NO on this project!

Thank you

Jim Mahoney
Cell 714 329-8400

-----Original Message-----

From: Brenda Tharp <brendatharpphoto@icloud.com>

Sent: Tuesday, February 24, 2026 9:36 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

[You don't often get email from brendatharpphoto@icloud.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=Lv-f3x5-PKyP-aQ8Bn1Bupo1qcZlLv u8uWThiH0Fi4FsmodTdHKMq74gUUr65NNk&s=JzNMDY4RM1OrMAg4bxO8jdJOn-0Qw9tFJOhs2lPrilU&e=]

In a region where water is already precious and needed to keep the Inyo Valley a viable place for birds and wildlife, not to mention people, and I believe that taking more water out of the valley would be detrimental. I have no science background, but I see more and more resources taken from the environment, many time in environments that cannot support it. Not to mention that plastic bottles are the bane of our world, and we should be reducing production of those, not increasing it so they can fill it with more and more water...

Sincerely,
Brenda Tharp

From: Mark Bir <mbiropm@gmail.com>

Sent: Tuesday, February 24, 2026 1:36 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from mbiropm@gmail.com. [Learn why this is important](#)

I am concerned with the proposal by Crystal Geyser to pump even more water from the area. LADWP already takes millions of gallons and the impending mining in Conglomerate Mesa would also add to these exports or wasted water used by polluting industries.

- Please ensure that Environmental Impact Report analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.
- As the lead agency, Inyo County needs to commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Thank you for your consideration

Mark Bir

Bishop resident

From: rosanne Higley <rhigley62@gmail.com>

Sent: Monday, February 23, 2026 1:16 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from rhigley62@gmail.com. [Learn why this is important](#)

1. Please be sure all environmental analyses, reports, etc. address cumulative effects of groundwater and surface water use and export. Analysis of this project must include groundwater and surface water exported to LA and water mitigation projects on the Owens Lake to prevent further degradation of our land, water, vegetation, and scenic quality.

2. Be sure to address the needs of local indigenous people.

3. Recognize that water bottled in single-use plastic is rapidly becoming an outdated practice. Single-use water bottles are an environmental disaster throughout the world, in terms of trash, water quality degradation, and the long-term health impacts of forever plastics. These bottles are no longer legally sold in California.

4. Address the impacts of pollution caused by the facility, including plastic waste issues in #3 above.

Thank you. Rosanne Higley, Swall Meadows

--

Sent from Gmail Mobile

From: Coral Taylor <coral.rose79@gmail.com>

Sent: Monday, February 23, 2026 12:00 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from coral.rose79@gmail.com. [Learn why this is important](#)

To Whom It May Concern:

Crystal Geyser is one of the largest exporters of water from Inyo County, where the land has already suffered decades of groundwater extraction by LADWP.

As a resident of the Eastern Sierra and an Environmental Engineer, I'm concerned about the impacts from groundwater extraction, on the health of the local aquifer and groundwater-dependent ecosystems, which are already being affected by groundwater pumping. I'm also concerned about the production of additional single-use plastic water bottles in an age where we already know about the impacts of micro plastics and climate-change associated with fossil fuel extraction (necessary to make plastic).

I would like to request that the Environmental Impact Report analyze the **cumulative impacts** that could result from current and future groundwater extraction by both Crystal Geyser and the operations of LADWP.

I would also like to request that Inyo County, as the lead agency, commit to early and frequent consultation with the Tribes of the Owens Valley to meaningfully fulfill the County's obligations under Assembly Bill 52.

Thank you for your time and attention to this matter.

--

Regards,
Coral Taylor, P.E.

coral.rose79@gmail.com
530.386.6357

From: Harald Kanz <hkanz2000@gmail.com>

Sent: Monday, February 23, 2026 6:50 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

[You don't often get email from hkanz2000@gmail.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A_aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=wzLgYE9UBDEiYZ8K4Lo9I16vkHKQxwvpVrdjgGJ9COI&m=rn1r0ePl_2mdfQY4nNYGsN8tKQeH75U7X-5piqDMWsLWnkkduQFI5cO55g6BsBaX&s=OYX0hAeLPwLWtdNdAUAKs5cMhoptkqh0pamS-FWzf64&e=]

Hi

I believe the water just comes out of the ground from artesian wells - really pristine water. Lufthansa was serving Crystal Geyser on my flight to Munich.

What bothers me is that it feels like a French company is taking our water. I believe so far they have used only unmarked trucks mostly at night to transport the water. Unmarked and secretive because they feel like thieves?

Harald

From: Mary Canada <mcanada62@gmail.com>

Sent: Tuesday, February 24, 2026 6:48 AM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

You don't often get email from mcanada62@gmail.com. [Learn why this is important](#)

Cathreen,

PLEASE make sure this project doesn't happen. Single use plastic bottles are a horrible use of our precious ground water or wherever they pump their water! Thank goodness Mammoth had the good sense to cancel sales of single use water bottles (from all companies) within the town. It's a good start to reducing Americans perceived NEED for single use plastic bottles. Inyo County could do the same!

Thanks for your attention to this.

Mary Canada

From: Mark Palmer <markatbighand@gmail.com>

Sent: Wednesday, April 15, 2026 5:10 PM

To: Cathreen Richards <crichards@inyocounty.us>

Subject: Crystal Geyser Roxane Grant Ranch Project Environmental Impact Report

I am writing to express my concern over the expansion of Crystal Geyser's expansion.

The Owens valley has been exporting water both through the DWP and from Crystal Geyser's bottling facility for many years. And the effect on the water table and the landscape are clear. Another large production well is going to stress the eastside's aquifer even more. It is imperative that the environmental report take into consideration the cumulative impacts of this ongoing demand on the water table and how it will affect both the landscape and the wildlife.

Also it's vital the county commit to including the tribes of the valley in consultation from the project's earliest days. They are undeniable stakeholders in the Owens Valley.

Thank you

Mark Palmer

markatbighand@gmail.com

Yucca Valley CA 92284

Dear

Inyo Co. Planning Dept.

I am a current property owner in
Lone Pine and former long-time resident

Thank you for Safeguarding Inyo
County's (public & private) lands

I hope that you consider the cumulative
effects of another building & ex-
traction facility in Olancha. Especially
the current unsafe egress onto the
Olancha bypass - The possible increase in
truck traffic could be dangerous. Perhaps
a CalTrans traffic study is in order?

Sincerely -

My address: Linda Heitko
608 Westview
Carson City, NV 89103

Inyo County
Planning

MAR 02 2026

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USA/POSTCARD



Cathleen Richards
Inyo Co Planning Dept.
168 N Edwards St

Annex Building
PO Drawer 2

Independence CA

93526

26 FEB 2026 AM 11:00
RENO NV 89103