

DOCKETED

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RB INYOKERN DATA CENTER

Application for Small Power Plant Exemption (SPPE)

Inyokern, Kern County, California

Docket Number - 26-SPPE-01

Supporting Document Appendix N

Subsection(s):

- N.1 LORS Matrix
- N.2 Supporting Maps, Images, & Documents
- N. 3 Cumulative Projects Analysis

RB INYOKERN DATA CENTER

Application for Small Power Plant Exemption (SPPE)

Inyokern, Kern County, California

Docket Number - 26-SPPE-01

Supporting Document Appendix N

Subsection(s):

- N.1 LORS Matrix

Appendix N.1

Laws, Ordinances, Regulations, and Standards (LORS) Compliance Matrix

RB Inyokern Data Center (RBIDC) - SPPE Application 26-SPPE-01

Document Status and Continuing Coordination

This Appendix N.1 LORS Compliance Matrix is provided as a good-faith, working compliance matrix prepared to support CEC Staff review of the RB Inyokern Data Center SPPE Application and to demonstrate the Applicant's current understanding of applicable requirements under Title 20, California Code of Regulations, Appendix B, Section (i). The matrix is intended to be a living document and may be supplemented, refined, or revised as final engineering advances, agency consultations proceed, permit applications are filed or acted upon, and CEC Staff comments are received.

Status Key

Status	Definition
Complete	Requirement addressed in the SPPE Application as filed
Planned (Final Design)	Will be demonstrated in final permitted construction documents
Pending (Agency Action)	Awaiting agency issuance, approval, or determination
Ongoing (Operations)	Continuous compliance obligation during facility operations

1. CEQA and CEC Jurisdiction

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
1.1	CEC	Pub. Resources Code 25541; 20 CCR 1934–1936	Small Power Plant Exemption (SPPE) for thermal power plants between 50 and 100 MW.	Application submitted for a Small Power Plant Exemption (SPPE) for the RBIDC emergency backup generating facility. Facility serves only on-site critical loads, with maximum operational load served not exceeding 99 MW.	1.1	Complete	Applicant
1.2	CEC	20 CCR Appendix B, Section (i)	Requires LORS compliance disclosure and permit/approval identification.	Appendix N.1 provides the LORS matrix and related permit/agency information.	1.8; 1.14; App. N.1	Complete	Applicant
1.3	CEC / Kern County	CEQA Guidelines (14 CCR 15000 et seq.)	CEQA review of discretionary project approvals.	Application includes CEQA analysis for the SPPE component and combined Project impacts. Kern County retains land-use authority for local entitlements.	1.6; 1.9; 4.1–4.20	Complete / Pending Agency Review	Applicant / CEC

2. Air Quality

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
2.1	EPA	Clean Air Act 110; 42 USC 7410	NAAQS / SIP compliance.	Project emissions are evaluated in the AQIA and Section 4.3.	4.3; App. F.1	Complete	Applicant
2.2	EPA	40 CFR Part 60, Subpart IIII	NSPS for stationary compression ignition engines.	The Project will use Tier 2-certified emergency standby engines with external Johnson Matthey SCR/DPF aftertreatment achieving Tier 4 Final-equivalent outlet emissions.	4.3; 4.6; App. F.1	Complete	Applicant
2.3	EPA	40 CFR Part 63, Subpart ZZZZ	NESHAP for stationary RICE.	Compliance will be addressed through the Subpart IIII/ZZZZ framework described in the AQIA and final permits.	4.3; App. F.1	Complete	Applicant
2.4	CARB	17 CCR 93115	ATCM for stationary compression ignition engines.	Emergency generator testing, maintenance, fuel use, and records will comply with CARB ATCM requirements.	4.3	Ongoing (Operations)	Applicant
2.5	CARB	13 CCR 2449	In-use off-road diesel equipment regulation.	Construction equipment will comply with applicable CARB fleet and idling requirements.	4.3	Planned (Construction)	Contractor
2.6	EKAPCD	Rules 202 and 427	Permits and emergency standby engine requirements.	EKAPCD air permits will be obtained before installation/operation of regulated stationary sources.	1.8; 4.3	Pending (Agency Action)	Applicant / EKAPCD
2.7	EKAPCD	Rule 210.1	New/modified stationary source review and BACT.	The Project will use the emissions-control strategy described in Section 4.6 and the AQIA, subject to EKAPCD review.	4.3; 4.6; App. F.1	Pending (Agency Action)	Applicant / EKAPCD
2.8	EKAPCD	Rule 402	Fugitive dust control.	Construction dust controls will be implemented as described in Section 4.3.	4.3	Planned (Construction)	Contractor

3. Biological Resources

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
3.1	USFWS	Endangered Species Act (16 USC 1531 et seq.)	Prohibits take of federally listed threatened and endangered species.	Reconnaissance and protocol-level floristic surveys completed. Pre-construction species surveys and applicable avoidance, minimization, and mitigation measures will be implemented before ground disturbance.	4.4	Complete / Planned Pre-Construction	Applicant
3.2	USFWS	Migratory Bird Treaty Act (16 USC §703 et seq.)	Prohibits take of migratory birds, nests, and eggs.	Pre-construction nesting bird surveys will be conducted if work occurs during the nesting season. Avoidance buffers will be established around active nests.	4.4	Planned (Final Design)	Contractor
3.3	CDFW	Fish & Game Code 2050-2098; 2081 et seq.	CESA compliance and take authorization where required.	CDFW Incidental Take Permit as pending; biological mitigation and permit conditions will be implemented.	1.8; 4.4	Pending (Agency Action)	Applicant / CDFW
3.4	CDFW	Fish & Game Code 1602	Requires notification for activities that may substantially alter the bed, bank, or channel of a river, stream, or lake.	The project site avoids jurisdictional ephemeral washes. No Lake and Streambed Alteration Agreement is anticipated.	4.4	Complete	Applicant

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
3.5	CDFW	Fish & Game Code 3503, 3503.5	Protects nesting birds and raptors.	Pre-construction nesting surveys and avoidance buffers will be implemented consistent with CDFW guidelines.	4.4	Planned (Final Design)	Contractor

4. Cultural and Tribal Cultural Resources

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
4.1	SHPO	National Historic Preservation Act (54 USC 306108, Section 106)	Requires consideration of effects on historic properties for federal undertakings.	A cultural resources survey has been completed. No historic properties will be adversely affected. No federal nexus is anticipated.	4.5	Complete	Applicant
4.2	CEC (Lead Agency)	CEQA Guidelines 15064.5	Requires evaluation of impacts to historical and archaeological resources.	A Phase I Cultural Resources Assessment has been completed. Mitigation measures require archaeological monitoring and inadvertent discovery procedures during ground disturbance.	4.5	Complete	Applicant
4.3	CEC / NAHC / Tribes	PRC 21080.3.1 (AB 52)	Tribal consultation for potential tribal cultural resources.	AB 52 consultation has been initiated and will be completed through the CEC process.	4.17	Pending / Ongoing	CEC / Applicant

5. Energy

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
5.1	CEC	Warren-Alquist Act (Pub. Resources Code 25000 et seq.)	Establishes CEC jurisdiction over thermal power plants.	SPPE submitted for RBIDC emergency backup generating facility under CEC authority. Facility serves only on-site critical loads, with maximum operational load served not exceeding 99 MW.	4.6	Complete	Applicant
5.2	CEC	Title 24, Part 6 (California Energy Code)	California Building Energy Efficiency Standards for nonresidential buildings.	Data center buildings will comply with applicable Title 24, Part 6 requirements for building envelope, lighting, and mechanical systems.	4.6	Planned (Final Design)	Applicant
5.3	SCE	Rule 2, Rule 15, Rule 16	Electric service connection, distribution line extension, and transmission line extension rules.	The project will comply with all SCE interconnection requirements per the Method of Service (MOS174) for 99 MW permanent service at 115 kV.	4.6	Complete	Applicant / SCE

6. Geology, Soils, and Paleontological Resources

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
6.1	CBC	California Building Code (Title 24, Part 2, Chapter 16–18)	Establishes structural design standards for seismic safety, foundations, and soils.	All buildings and foundations will be designed in accordance with CBC seismic design standards (Risk Category III or IV as applicable).	4.7	Planned (Final Design)	Applicant

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
6.2	SWRCB	Construction General Permit (Order 2009-0009-DWQ, as amended)	Requires erosion and sediment control during construction.	A SWPPP will be prepared and implemented to prevent erosion and sedimentation.	4.7	Planned (Final Design)	Contractor
6.3	Society of Vertebrate Paleontology	SVP Guidelines (2010)	Professional standards for paleontological resource assessment and mitigation.	A Paleontological Resources Assessment has been completed. Monitoring will be conducted during excavation in sensitive formations.	4.7	Complete	Applicant

7. Greenhouse Gas Emissions

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
7.1	CARB	AB 32 (Health & Safety Code 38500 et seq.)	California Global Warming Solutions Act — requires statewide GHG reductions to 1990 levels by 2020.	Project GHG emissions are evaluated in Section 4.8 and remain below the EKAPCD 25,000 MT CO2e/year significance threshold.	4.8	Complete	Applicant
7.2	CARB	SB 32 (Health & Safety Code §38566)	Requires 40% reduction below 1990 levels by 2030.	The Project is consistent with the 2022 Scoping Plan through use of controlled emergency standby engines with external SCR/DPF aftertreatment achieving Tier 4 Final-equivalent emissions performance, renewable diesel as the preferred fuel when available, and on-site solar.	4.8	Complete	Applicant
7.3	CARB	AB 1279 (Health & Safety Code 38562.2)	Requires carbon neutrality by 2045.	The project incorporates design features (rooftop solar, high-efficiency cooling, PUE of 1.41) consistent with the state's decarbonization trajectory.	4.8	Complete	Applicant
7.4	Governor's Office	Executive Order B-55-18	Establishes goal of carbon neutrality by 2045.	See 7.3 above.	4.8	Complete	Applicant

8. Hazards and Hazardous Materials

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
8.1	EPA	40 CFR Part 112	Spill Prevention, Control, and Countermeasure (SPCC) Rule for facilities storing >1,320 gallons of oil.	An SPCC Plan will be prepared and implemented for the 600,000-gallon diesel fuel storage system.	4.9	Planned (Final Design)	Applicant
8.2	EPA	40 CFR Part 68 (RMP) / CalARP	Risk Management Program for facilities with regulated substances above threshold quantities.	A CalARP screening will be conducted. Diesel fuel is not a listed substance; however, battery electrolyte quantities will be evaluated.	4.9	Planned (Final Design)	Applicant
8.3	DTSC	Health & Safety Code 25100 et seq. (RCRA/HWCL)	Hazardous Waste Control Law — regulates generation, transport, and disposal of hazardous waste.	The project will obtain a hazardous waste generator ID, maintain manifests, and dispose of all hazardous waste at permitted facilities.	4.9	Ongoing (Operations)	Applicant
8.4	CUPA (Kern County EHD)	Health & Safety Code 25500 et seq.	Hazardous Materials Business Plan (HMBP) requirements.	An HMBP will be submitted to the Kern County Environmental Health Division (CUPA) prior to storage of hazardous materials on-site.	4.9	Planned (Final Design)	Applicant

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
8.5	Cal/OSHA	Title 8 CCR (various)	Occupational safety and health standards for construction and operations.	The project will comply with all applicable Cal/OSHA workplace safety requirements including confined space, fall protection, and electrical safety.	4.9	Ongoing (Operations)	Applicant
8.6	Kern County Fire Department	California Fire Code (Title 24, Part 9); NFPA 30, 855	Fire safety, flammable liquid storage, and energy storage system standards.	Project fire protection, fuel storage, and battery systems will be designed and permitted in coordination with the Kern County Fire Department / Fire Marshal.	4.9	Planned (Final Design)	Applicant / KCFD
8.7	DOT / CHP	49 CFR Parts 171–180; 13 CCR Division 2	Hazardous materials transportation regulations.	All diesel fuel deliveries will be conducted by licensed hazmat carriers in compliance with DOT and CHP requirements.	4.9	Ongoing (Operations)	Fuel Supplier

9. Hydrology and Water Quality

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
9.1	SWRCB	Construction General Permit (Order 2009-0009-DWQ)	Requires NPDES coverage for construction sites disturbing ≥1 acre.	A Notice of Intent (NOI) will be filed and a SWPPP will be prepared and implemented prior to ground disturbance.	4.10	Planned (Final Design)	Contractor
9.2	Lahontan RWQCB	Porter-Cologne Water Quality Control Act (Water Code §13000 et seq.)	Protects water quality in the Lahontan Region.	The project will implement BMPs to prevent degradation of surface and groundwater quality. No process wastewater will be discharged to land or surface waters.	4.10	Ongoing (Operations)	Applicant
9.3	IWVGA	SGMA (Water Code 10720 et seq.)	Groundwater Sustainability Plan for the Indian Wells Valley Basin (critically overdrafted).	Project will be served by Inyokern CSD. Water demand is evaluated in the Water Supply Assessment and is subject to applicable IWVGA Groundwater Sustainability Plan requirements.	1.4.5; 4.10; 4.18	Pending (Agency Action)	Applicant / CSD
9.4	Inyokern CSD	District Rules and Regulations	Water and wastewater service connection standards.	A Will-Serve letter has been obtained from the Inyokern CSD confirming capacity to serve the project.	4.10	Complete	Applicant / CSD
9.5	FEMA / Kern County Floodplain Administrator	44 CFR Parts 59-77; Kern County Floodplain Management Ordinance; FEMA Zone A SFHA	Requires compliance with NFIP and local floodplain development standards for development in FEMA Zone A.	Project Site is mapped within FEMA Zone A SFHA. Hydrology Study (Appendix E.1) concludes maximum modeled flood depths are less than 1.0 foot for the 100-year/24-hour event and recommends a conservative 1-foot BFE above existing or finished grade. Project complies with NFIP and Kern County Floodplain Management Ordinance through final civil design and any required LOMR or floodplain development permitting.	1.4.12; 4.10; 4.11	Planned (Pre-Construction)	Applicant / Kern County / FEMA
9.6	EPA / Inyokern CSD	40 CFR Part 403	National Pretreatment Program — regulates industrial discharges to publicly owned treatment works.	An industrial wastewater discharge permit will be obtained from the CSD if cooling tower blowdown exceeds domestic wastewater thresholds.	4.10	Planned (Final Design)	Applicant
9.7	FEMA / Kern County	FEMA Letter of Map Revision (LOMR) / NFIP	Provides formal map revision process where final grading/drainage changes flood hazard designation.	Final hydraulic modeling and LOMR application for the Project graded footprint if required; issuance is treated as a pre-construction floodplain compliance item.	1.4.12; 4.10; 4.11	Planned (Pre-Construction)	Applicant / Kern County / FEMA

10. Land Use and Planning

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
10.1	Kern County Planning	Kern County General Plan	Establishes land use designations and policy framework.	The project site is designated for industrial use and is consistent with the General Plan.	4.11	Complete	Applicant
10.2	Kern County Planning	Kern County Zoning Ord. 19.08.085; M-2 PD zoning; Inyokern Specific Plan	Local land use approvals and zoning consistency.	CUP, Specific Plan Amendment, and Lot Line Adjustment as pending local approvals.	1.8; 4.11	Pending (Agency Action)	Applicant / Kern County
10.3	NAWS China Lake	10 USC 2684a; DoD Instruction 4165.57	Military land use compatibility and encroachment prevention.	Certified mail notification has been sent to the NAWS China Lake Commanding Officer. The project does not conflict with military operations.	4.11	Complete	Applicant
10.4	Kern County Planning / Airport Land Use Compatibility Review	Kern County Airport Land Use Compatibility Plan; FAA Part 77 screening	Airport compatibility and height/glare screening.	Project is within Inyokern Airport Compatibility Zone C. Current design is below applicable height thresholds; FAA Form 7460-1 will be filed if final design triggers Part 77 notice criteria.	1.9.1; 2.4; 4.11; 4.16	Planned (Final Design)	Applicant / Kern County

11. Noise

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
11.1	Kern County	General Plan Noise Element, Table N-1	Establishes noise compatibility standards (65 dB Ldn for sensitive receivers)	Operational noise levels at the nearest sensitive receptor will not exceed applicable standards.	4.13	Complete	Applicant
11.2	Kern County	Zoning Ordinance 19.86	Noise performance standards for industrial zones.	The project will comply with all applicable noise performance standards at property boundaries.	4.13	Complete	Applicant
11.3	Cal/OSHA	Title 8 CCR 5095–5100	Occupational noise exposure limits (85 dBA TWA action level, 90 dBA PEL).	Workers will be provided hearing protection in areas exceeding 85 dBA. A Hearing Conservation Program will be implemented.	4.13	Ongoing (Operations)	Applicant

12. Transportation

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
12.1	Caltrans	Streets & Highways Code 660 et seq.	Encroachment permits for work within state highway rights-of-way.	Encroachment permits will be obtained for any utility crossings of US-395 or SR-178 if required.	4.16	Planned (Final Design)	Contractor
12.2	Kern County Roads	County Road Standards	Establishes road improvement and access standards.	Project access roads will be designed and constructed to Kern County standards.	4.16	Planned (Final Design)	Applicant
12.3	OPR	CEQA Guidelines 15064.3(b)	Vehicle Miles Traveled (VMT) analysis methodology.	A VMT analysis has been prepared demonstrating that the project does not exceed applicable VMT thresholds.	4.16	Complete	Applicant

13. Utilities and Service Systems

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
13.1	SCE	Tariff Rules 2, 15, 16; MOS174	Electric service connection, distribution and transmission line extension rules.	The project has received a Method of Service (MOS174) letter from SCE confirming 99 MW permanent service at 115 kV from Inyokern Substation.	4.18, M.3	Complete	Applicant / SCE
13.2	Inyokern CSD	District Rules	Water service connection and capacity.	A Will-Serve letter has been obtained confirming water service availability for the project's demand.	4.18, M.3	Complete	Applicant / CSD
13.3	Inyokern CSD	District Rules	Wastewater service connection and capacity.	A Will-Serve letter has been obtained confirming wastewater service availability.	4.18, M.3	Complete	Applicant / CSD
13.4	CalRecycle	Public Resources Code 40000 et seq.	Solid waste diversion and disposal requirements.	Construction waste will be diverted at a minimum 65% rate consistent with CALGreen requirements. Operational waste will be managed through licensed haulers.	4.18	Ongoing (Operations)	Applicant
13.5	Telecom Providers	CPUC General Orders	Telecommunications service standards.	Commercial fiber service via Onward through redundant carrier-diverse north and south routes (432 strands) with access to Digital 395. SCE will install two dedicated utility fiber routes (Path A 3,200 ft, Path B 8,250 ft) for protection and control communications consistent with MOS174.	4.18	Planned (Final Design)	Applicant
13.6	CPUC / SCE	Public Utilities Code; CPUC General Order 131-E	Applies to SCE 115 kV subtransmission facilities and Permit to Construct exemption pathway.	SCE facilities are anticipated to proceed through a GO 131-E Section III.B.2(e) PTC exemption pathway, contingent on CEQA documentation covering SCE scope.	1.6; 2.0; 4.18, M.3	Pending (Agency Action)	SCE / CPUC
13.7	Kern County LAFCo / Inyokern CSD	Cortese-Knox-Hertzberg Act; LAFCo annexation process	Annexation into Inyokern CSD is required for water and wastewater service.	Annexation into Inyokern CSD; CSD will-serve documentation supports water and sewer service framework.	1.4.5; 1.8; 4.18	Pending (Agency Action)	Applicant / LAFCo / CSD

14. Wildfire

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
14.1	Kern County Fire	Kern County Fire Code / California Fire Code	Fire access, water supply, and vegetation management requirements.	Project fire protection and emergency access will be coordinated with Kern County Fire.	4.20; 4.9	Planned (Final Design)	Applicant / KCFD

15. Local Permits and Approvals

No.	Agency	LORS Citation	Requirement / Standard	Project Conformance	App. Section	Status	Responsible Party
15.1	Kern County Planning	Kern County Zoning Ord. 19.08.085	Conditional Use Permit for Project entitlements, including emergency backup generation and associated site development as applicable.	CUP is pending with Kern County Planning Department.	1.8; 4.11	Pending (Agency Action)	Applicant / Kern County
15.2	Kern County Building	Kern County Code of Building Regulations (Title 17)	Building permits for all structures.	Building permits will be obtained prior to construction of all data center buildings and ancillary structures.	1.4	Planned (Final Design)	Applicant
15.3	Kern County Grading	Kern County Grading Ordinance	Grading permits for earthwork exceeding thresholds.	A grading permit will be obtained prior to site preparation activities.	1.4	Planned (Final Design)	Applicant
15.4	Kern County EHD	Health & Safety Code §25404	Unified Program (CUPA) — consolidated environmental permits.	The project will enroll in the Kern County Unified Program for hazardous materials management, underground storage, and aboveground storage.	4.9	Planned (Final Design)	Applicant
15.5	Kern County Planning / Surveyor-Recorder	Lot Line Adjustment No. 28-25 / Parcel Consolidation	Requires final parcel configuration so Project facilities are located on an appropriate legal parcel before construction.	Lot Line Adjustment No. 28-25 / parcel consolidation pending pre-construction.	1.2.2; 1.8; 4.11	Planned (Pre-Construction)	Applicant / Kern County
15.6	Kern County Board of Supervisors	Inyokern Specific Plan Amendment	Removes or modifies planned future 90-foot right-of-way secondary collector constraint.	Specific Plan Amendment is listed in Application Table 1-3 as pending.	1.8; 4.11	Pending (Agency Action)	Applicant / Kern County
15.7	Kern County LAFCo	Annexation into Inyokern CSD	Annexation to CSD service area for domestic water and sanitary sewer service.	Annexation into Inyokern CSD is listed in Application Table 1-3 as pending.	1.4.5; 1.8; 4.18	Pending (Agency Action)	Applicant / LAFCo / CSD

16. Permit Schedule and Agency Contacts

The following tables summarize permit/agency information for Appendix B Section (i) review.

16.1 Permit Schedule

Item	Agency	Status	Timing / Notes
SPPE	CEC	This Application	CEC review and decision.
Conditional Use Permit	Kern County Planning	Pending	Process with local entitlement package.
Lot Line Adjustment No. 28-25 / Parcel Consolidation	Kern County Planning	Pending (pre-construction)	Complete before construction.
Inyokern Specific Plan Amendment	Kern County Board of Supervisors	Pending	Process before construction as required.
Annexation into Inyokern CSD	Kern County LAFCo	Pending	Required for CSD water/sewer service.

Item	Agency	Status	Timing / Notes
EKAPCD air permits	EKAPCD	Pending	Obtain before generator installation/operation as required.
SCE interconnection / subtransmission approvals	SCE / CPUC as applicable	MOS174 issued; final steps pending	Complete SCE engineering, ROW, and GO 131-E process as applicable.
SWPPP / Construction General Permit	SWRCB	Pending (pre-construction)	File NOI and implement SWPPP before ground disturbance.
CDFW Incidental Take Permit	CDFW	Pending	Coordinate with CDFW and implement permit conditions.
Kern County drainage / grading permits	Kern County Public Works	Pending	Obtain before grading/drainage work.
Building permits	Kern County Building Department	Pending	Obtain before building construction.
FEMA / floodplain compliance	FEMA / Kern County Floodplain Administrator	Planned if required	Compliance deliverable referenced in Application; not listed as a separate discretionary approval in Table 1-3.
SPCC Plan	EPA / applicable local agencies	Planned before fuel storage operations	Compliance plan referenced in Application.
HMBP / CUPA filing	Kern County Fire / CUPA	Planned before regulated materials storage	Compliance filing referenced in Application.

16.2 Agency Contacts

Agency	Name / Title	Address	Phone / Email
California Energy Commission (Lead Agency - SPPE)	Ali Jahani, Project Manager	715 P Street, Sacramento, CA 95814	279-226-1175 ali.jahani@energy.ca.gov
Kern County Planning and Natural Resources Department (CUP / Land Use)	Craig M. Murphy, Director; assigned project planner to be confirmed upon CUP filing	2700 M Street, Suite 100, Bakersfield, CA 93301	(661) 862-8600 planning@kerncounty.com
Inyokern Community Services District (Water and Sewer Service)	Holly Gallier, General Manager	1429 Broadway, P.O. Box 1418, Inyokern, CA 93527	(760) 878-0002 manager@inyokerncsd.com
Eastern Kern Air Pollution Control District (EKAPCD)	Gary Ray, Jr., Air Pollution Control Officer	2700 M Street, Suite 302, Bakersfield, CA 93301-2370	(661) 862-5250 ekapcd@kerncounty.com
Southern California Edison (SCE) - Grid Interconnection	Grid Interconnection Contact (MOS174)	2244 Walnut Grove Ave, Rosemead, CA 91770	(909) 274-1106 interconnectionQA@sce.com Project-specific contact to be confirmed
Kern County Fire Department (Fire Prevention / CUPA)	Aaron Duncan, Fire Chief; Fire Prevention Bureau	5642 Victor Street, Bakersfield, CA 93308	(661) 391-3310 fireprevention@kerncountyfire.org
State Water Resources Control Board (SWRCB) - Construction General Permit	Water Quality Programs	1001 I Street, Sacramento, CA 95814; P.O. Box 100, Sacramento, CA 95812-0100	(916) 341-5455 waterboards.ca.gov

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Docket Number - 26-SPPE-01

Supporting Document Appendix N

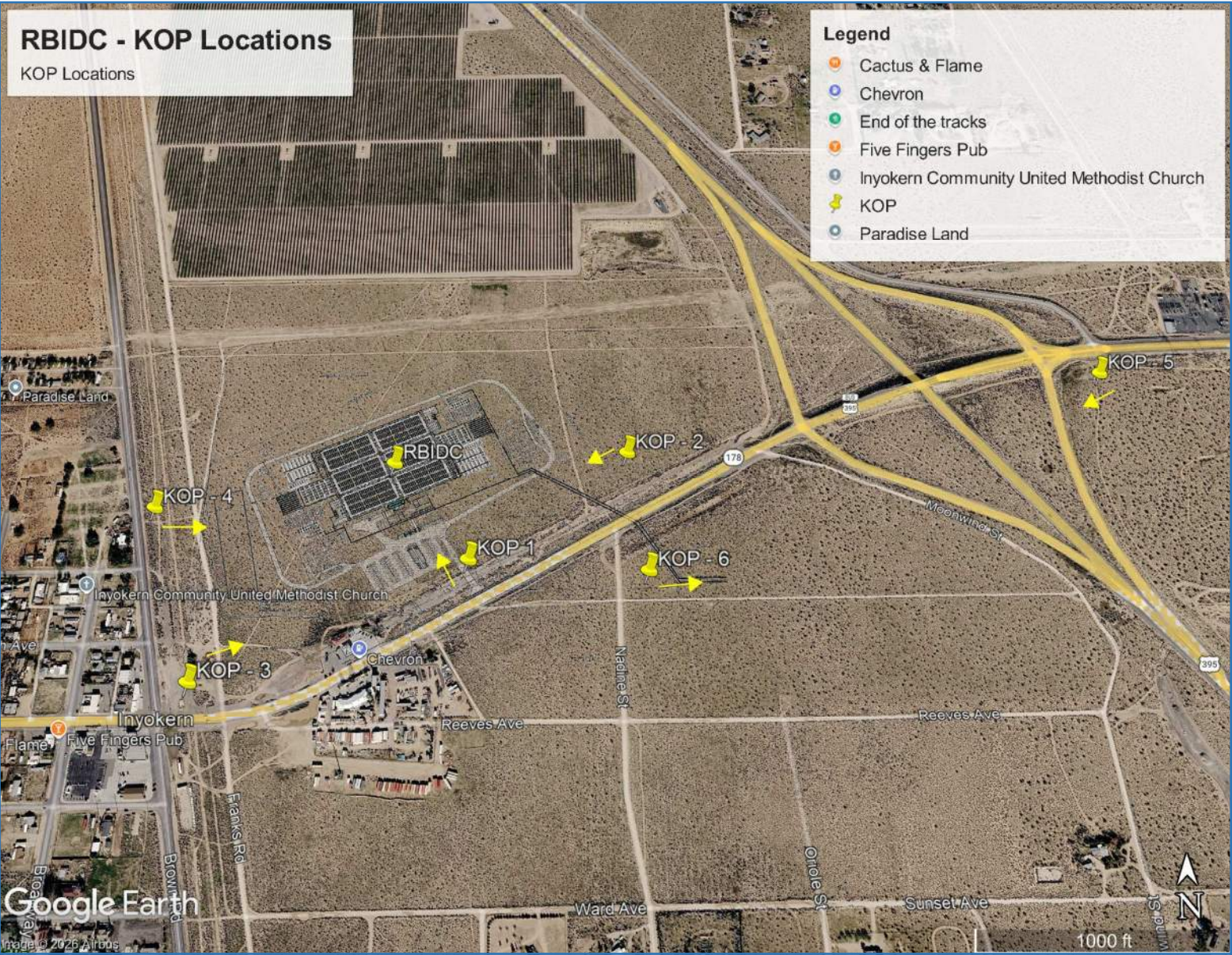
Subsection(s):

- N.2 Supporting Maps, Images, & Documents

Figure AST-001 – Key Observation Point (KOP) Location Map

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48
Datum: WGS84 / NAD83 | Coordinates: Geographic Decimal Degrees
Aerial: © 2026 Airbus / Google Earth Pro | March 2026



KOP COORDINATES

KOP	LATITUDE	LONGITUDE
1	35.648772°N 117.808053°W	
SR-178, Looking NNW toward Project		
2	35.650269°N 117.805597°W	
SR-178 / US-395 Interchange, Looking WSW		
3	35.647228°N 117.812036°W	
SR-178 / Brown Rd Intersection, Looking		
4	35.649594°N 117.812933°W	
Brown Road Residential Area, Looking ENE		
5	35.651358°N 117.797831°W	
US-395 Off-Ramp onto SR-178, Looking WNW		
6	35.648578°N 117.805319°W	
SR-178 / Nadine St, Looking ENE (SCE POI)		

Viewer Sensitivity:

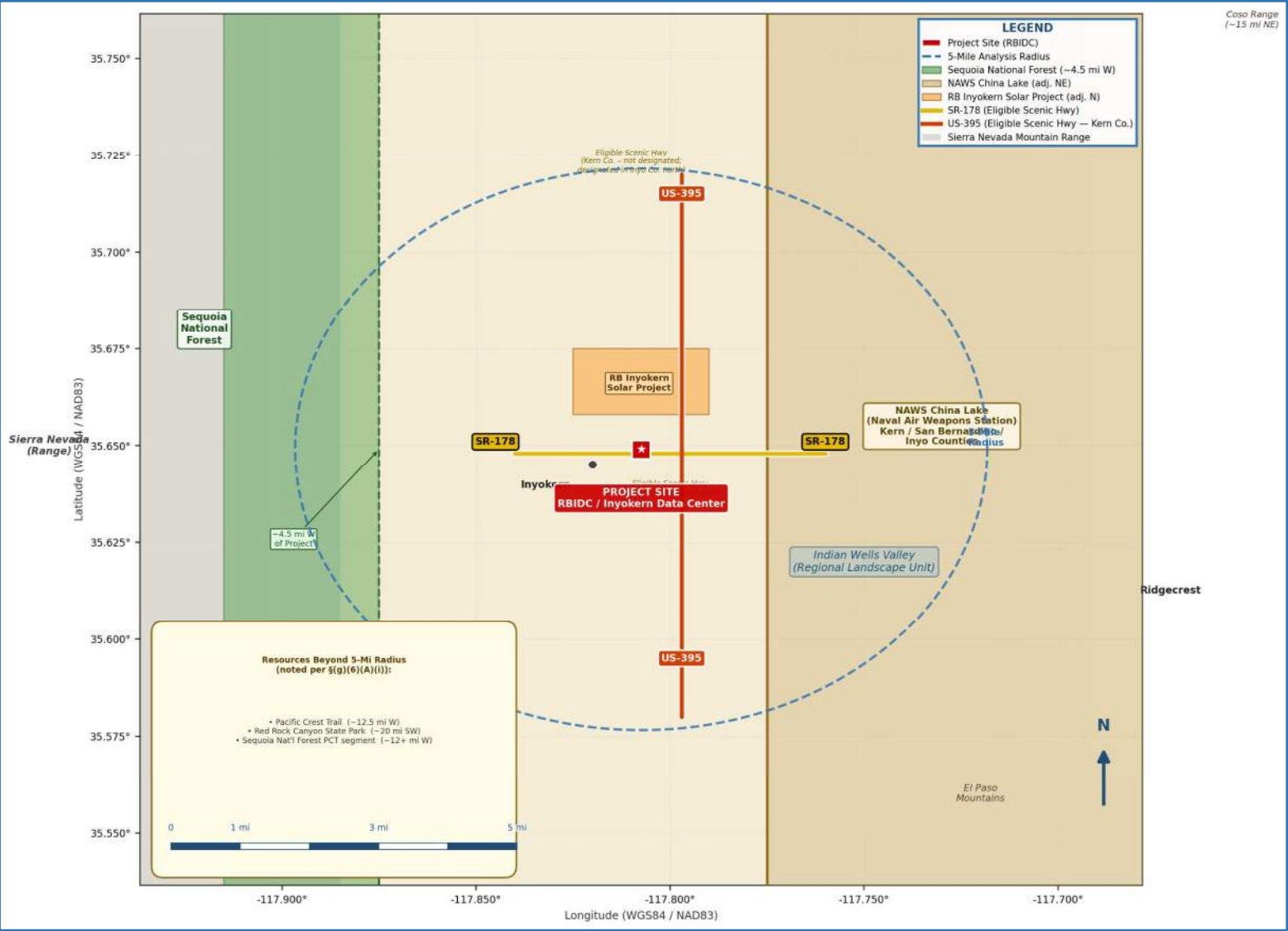
- High — Residential / Recreational
- Mod-High — Commercial
- Moderate — Motorist / Utility

Per 20 CCR Appendix B §(g)(6)(C)
Non-urbanized area visual analysis.
Min. 2 KOPs required; 6 provided.
All coordinates field-confirmed GPS.

Figure AST-002 – Scenic Resources Map: 5-Mile Analysis Radius

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48
Datum: WGS84 / NAD83 | Per 20 CCR Appendix B §(g)(6)(A)(i)
Sources: Caltrans, USFS, DON, Kern County GIS | March 2026



SCENIC RESOURCES	
Within & Near 5-Mile Radius	
RESOURCE	DIST.
IN Sequoia Nat'l Forest	USFS Protected Land ~4.5 mi W
IN NAWS China Lake	Federal Military Land Adj. NE
IN RB Inyokern Solar	Utility-Scale Solar Adj. N
IN SR-178 Corridor	Eligible Scenic Hwy* On-site S
IN US-395 Corridor	Eligible Scenic Hwy* ~1.5 mi NE
IN Indian Wells Valley	Regional Landscape Unit Regional
OUT Pacific Crest Trail	Nat'l Scenic Trail ~12.5 mi W
OUT Red Rock Canyon SP	California State Park ~20 mi SW
*Eligible Scenic Hwy = listed in CA Streets & Hwy Code but NOT officially designated by Caltrans in Kern County. US-395 IS designated in Inyo Co. north of project area. SR-178 is not designated on any segment. (Source: Caltrans, 2024)	

Scenic resource locations approximate. Boundaries generalized from USFS, Caltrans, DON, and Kern County GIS sources. No officially designated scenic highways exist within Kern County portion of project vicinity.

Figure AST-004 – KOP 1 Existing Conditions Photograph

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48

March 11, 2026 | 9:22 AM PST | Clear Weather

Apple iPhone 17 Pro Max | 24mm (35mm equivalent) | 73.7° horizontal FOV



KOP 1 – PHOTO DATA
Figure AST-004

Location:	SR-178 (Inyokern Rd), south of project site
Coordinates:	35°38'55.58"N / 117°48'28.99"W
Date:	March 11, 2026
Time:	9:22 AM PST
Camera:	Apple iPhone 17 Pro Max
Lens:	6.765mm f/1.78 (Main / 1x)
35mm Equiv:	24mm (35mm equivalent)
Horiz. FOV:	73.7° horizontal
Direction:	NNW — toward project site interior
Distance:	~65 m (~215 ft) from southern project boundary
Sensitivity:	HIGH

Existing Conditions Description:
View looking NNW from SR-178 toward project site. Foreground shows Mojave creosote-saltbush scrub with concrete debris remnants. Project site occupies flat alluvial plain in middle ground. Sierra Nevada Range with snow-capped peaks visible in background to northwest. No existing structures on project site visible at this distance.

Figure AST-005 – KOP 2 Existing Conditions Photograph

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48

March 11, 2026 | 9:25 AM PST | Clear Weather

Apple iPhone 17 Pro Max | 14mm (35mm equivalent) | 104.3° horizontal FOV



KOP 2 – PHOTO DATA
Figure AST-005

Location:	SR-178 / US-395 interchange area, east of project
Coordinates:	35°39'0.97"N / 117°48'20.15"W
Date:	March 11, 2026
Time:	9:25 AM PST
Camera:	Apple iPhone 17 Pro Max
Lens:	2.22mm f/2.2 (Ultra-wide / 0.5x)
35mm Equiv:	14mm (35mm equivalent)
Horiz. FOV:	104.3° horizontal
Direction:	WSW — toward project site and utility easement
Distance:	~215 m (~705 ft) from eastern project boundary
Sensitivity:	HIGH

Existing Conditions Description:
View looking WSW from US-395/SR-178 interchange toward project site. Wide-angle view shows open Indian Wells Valley desert floor with creosote-saltbush scrub. Existing commercial/light industrial development visible at left horizon. Coso Range visible in background at right. Project site not yet developed; flat terrain with unobstructed sightlines across approximately 700 feet.

Figure AST-006 – KOP 3 Existing Conditions Photograph

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48
March 11, 2026 | 9:27 AM PST | Clear Weather
Apple iPhone 17 Pro Max | 24mm (35mm equivalent) | 73.7° horizontal FOV



KOP 3 – PHOTO DATA	
Figure AST-006	
Location:	SR-178 / Brown Road intersection, SW of project
Coordinates:	35°38'50.02"N / 117°48'43.33"W
Date:	March 11, 2026
Time:	9:27 AM PST
Camera:	Apple iPhone 17 Pro Max
Lens:	6.765mm f/1.78 (Main / 1x)
35mm Equiv:	24mm (35mm equivalent)
Horiz. FOV:	73.7° horizontal
Direction:	NE — toward project SW corner
Distance:	~467 m (~1,532 ft) from SW project corner
Sensitivity:	MODERATE-HIGH
Existing Conditions Description: View looking NE from SR-178/Brown Road intersection toward project SW corner. Foreground shows gravel shoulder and native desert scrub. Chevron gas station canopy visible at right edge of frame. Project site occupies undeveloped flat terrain in middle ground; Argus Range visible in far background. Existing utility poles along SR-178 present in view.	

Figure AST-007 – KOP 4 Existing Conditions Photograph

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48
March 11, 2026 | 9:28 AM PST | Clear Weather
Apple iPhone 17 Pro Max | 24mm (35mm equivalent) | 73.7° horizontal FOV



KOP 4 – PHOTO DATA	
Figure AST-007	
Location:	Brown Road, residential area west of project
Coordinates:	35°38'58.54"N / 117°48'46.56"W
Date:	March 11, 2026
Time:	9:28 AM PST
Camera:	Apple iPhone 17 Pro Max
Lens:	6.765mm f/1.78 (Main / 1x)
35mm Equiv:	24mm (35mm equivalent)
Horiz. FOV:	73.7° horizontal
Direction:	ENE — toward project western boundary
Distance:	~505 m (~1,657 ft) from western project boundary
Sensitivity:	HIGH
Existing Conditions Description: View looking ENE from Brown Road residential area toward project western boundary. Foreground shows desert scrub with native saltbush. High-voltage transmission towers visible along horizon — existing SCE infrastructure that will be associated with the project’s utility interconnection. Water tower visible at right. Mountains of the Coso Range visible at right background. Project site undeveloped flat terrain in middle ground.	

Figure AST-008 – KOP 5 Existing Conditions Photograph

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48
March 11, 2026 | 9:32 AM PST | Clear Weather
Apple iPhone 17 Pro Max | 17mm (35mm equivalent) | 93.3° horizontal FOV



KOP 5 – PHOTO DATA Figure AST-008	
Location:	US-395 off-ramp onto SR-178, east of project
Coordinates:	35°39'4.89"N / 117°47'52.19"W
Date:	March 11, 2026
Time:	9:32 AM PST
Camera:	Apple iPhone 17 Pro Max
Lens:	2.22mm f/2.2 (Ultra-wide, digital zoom 1.26x)
35mm Equiv:	17mm (35mm equivalent)
Horiz. FOV:	93.3° horizontal
Direction:	WNW — toward SCE POI and transmission corridor
Distance:	~914 m (~2,999 ft) from eastern project boundary
Sensitivity:	MODERATE
Existing Conditions Description: View looking WNW from US-395 off-ramp toward SCE Point of Interconnection and associated transmission corridor. Existing high-voltage transmission towers extend across the middle-ground horizon — the dominant visual element from this vantage. Graded dirt access road in foreground with tire tracks. Project site undeveloped terrain behind scrub vegetation at background distance (~3,000 ft). This KOP captures the motorist view of the SCE POI infrastructure from US-395.	

Figure AST-009 – KOP 6 Existing Conditions Photograph

Inyokern Data Center | CEC SPPE Application | §4.1 Aesthetics / Visual Resources | Kern County, CA

APNs: 084-010-43, 084-010-44, 084-010-45, 084-010-48
March 11, 2026 | 9:30 AM PST | Clear Weather
Apple iPhone 17 Pro Max | 24mm (35mm equivalent) | 73.7° horizontal FOV



KOP 6 – PHOTO DATA
Figure AST-009

Location: SR-178 / Nadine St area, south of project (SCE POI vicinity)

Coordinates: 35°38'54.88"N / 117°48'19.15"W

Date: March 11, 2026

Time: 9:30 AM PST

Camera: Apple iPhone 17 Pro Max

Lens: 6.765mm f/1.78 (Main / 1x)

35mm Equiv: 24mm (35mm equivalent)

Horiz. FOV: 73.7° horizontal

Direction: ENE — toward SCE POI (direct view)

Distance: ~201 m (~659 ft) from southern project boundary

Sensitivity: MODERATE

Existing Conditions Description:
View looking ENE directly toward SCE Point of Interconnection from utility access road (Nadine St area). Existing distribution poles with power lines are prominent in right foreground and extend toward the POI in the background — establishing existing utility visual character at this location. High-voltage SCE transmission towers visible in middle ground at POI. Project site boundary at left middle ground. Sierra Nevada visible at far left background. This is the closest on-grade view of the SCE POI.

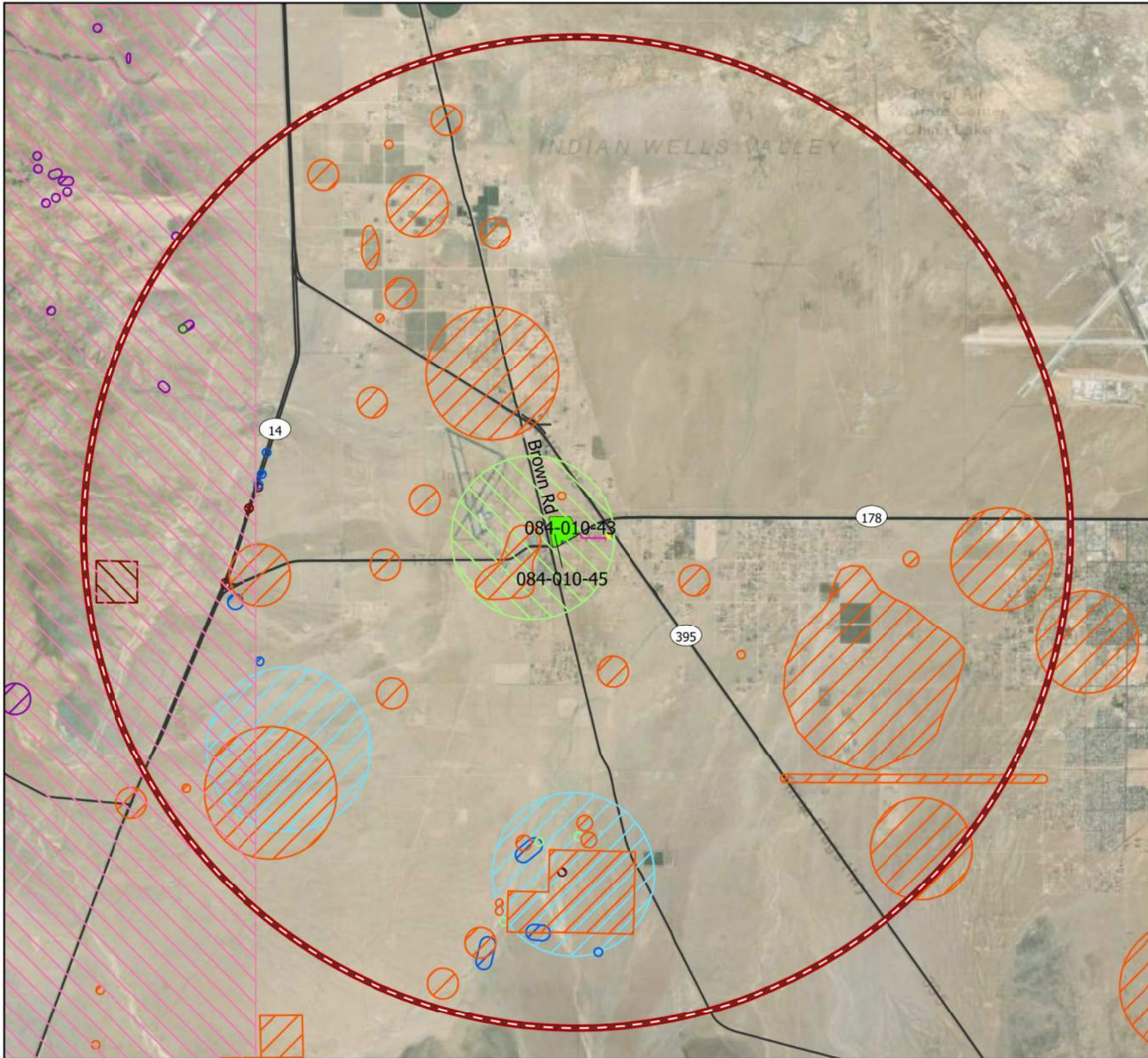
Table AST-003 – Key Observation Points (KOP) Summary

Inyokern Data Center | CEC SPPE Application | Section 4.1 Aesthetics / Visual Resources | Kern County, CA

Six (6) Key Observation Points (KOPs) were selected per 20 CCR Appendix B §(g)(6)(C) from publicly accessible locations representative of sensitive receptor viewpoints surrounding the project site. All KOP locations are depicted on Figure AST-001 (KOP Location Map). All GPS coordinates and photographic data are field-confirmed. Photographs were taken on March 11, 2026 under clear weather conditions using an Apple iPhone 17 Pro Max. Project site APNs: 084-010-43, 084-010-44, 084-010-45, and 084-010-48 (Kern County).

KOP #	Location	GPS Coordinates (Field-Confirmed)	Viewing Direction	Distance to Site	Viewer Group	Viewer Sensitivity	Photo Date & Time	Camera / Lens (EXIF-Confirmed)	Horiz. FOV	Photo Fig. Ref.
KOP 1	SR-178 (Inyokern Rd), south of project	35°38'55.58"N 117°48'28.99"W	NNW — toward project interior	~65 m (~215 ft) from southern boundary	Motorists & pedestrians on SR-178	HIGH	March 11, 2026 9:22 AM PST	Apple iPhone 17 Pro Max 6.765mm f/1.78 (Main 1x)	73.7° horizontal (24mm equiv.)	AST-004
KOP 2	SR-178 / US-395 interchange, east of project	35°39'0.97"N 117°48'20.15"W	WSW — toward project & utility easement	~215 m (~705 ft) from eastern boundary	Motorists on SR-178 and US-395	HIGH	March 11, 2026 9:25 AM PST	Apple iPhone 17 Pro Max 2.22mm f/2.2 (Ultra-wide 0.5x)	104.3° horizontal (14mm equiv.)	AST-005
KOP 3	SR-178 / Brown Road intersection, SW of project	35°38'50.02"N 117°48'43.33"W	NE — toward project SW corner	~467 m (~1,532 ft) from SW corner	Motorists & commercial users	MODERATE-HIGH	March 11, 2026 9:27 AM PST	Apple iPhone 17 Pro Max 6.765mm f/1.78 (Main 1x)	73.7° horizontal (24mm equiv.)	AST-006
KOP 4	Brown Road, residential area west of project	35°38'58.54"N 117°48'46.56"W	ENE — toward western boundary	~505 m (~1,657 ft) from western boundary	Residents & motorists on Brown Road	HIGH	March 11, 2026 9:28 AM PST	Apple iPhone 17 Pro Max 6.765mm f/1.78 (Main 1x)	73.7° horizontal (24mm equiv.)	AST-007
KOP 5	US-395 off-ramp onto SR-178, east of project	35°39'4.89"N 117°47'52.19"W	WNW — toward SCE POI & transmission corridor	~914 m (~2,999 ft) from eastern boundary	Motorists exiting US-395 onto SR-178	MODERATE	March 11, 2026 9:32 AM PST	Apple iPhone 17 Pro Max 2.22mm f/2.2 + 1.26x digital zoom	93.3° horizontal (17mm equiv.)	AST-008
KOP 6	SR-178 / Nadine St, south of project (SCE POI vicinity)	35°38'54.88"N 117°48'19.15"W	ENE — toward SCE POI (direct view)	~201 m (~659 ft) from southern boundary	Motorists & utility workers on SR-178	MODERATE	March 11, 2026 9:30 AM PST	Apple iPhone 17 Pro Max 6.765mm f/1.78 (Main 1x)	73.7° horizontal (24mm equiv.)	AST-009

Notes: All GPS coordinates field-confirmed (WGS84/NAD83 datum). All photographic metadata EXIF-confirmed. Viewer sensitivity classifications follow FHWA (2015) Visual Impact Assessment methodology. Distance zones: Foreground (<400 m), Middle Ground (400 m–4,800 m), Background (>4,800 m). Sensitivity: HIGH = residential/recreational; MODERATE-HIGH = commercial with direct site exposure; MODERATE = motorists/utility area with transient viewing duration. FOV = horizontal field of view. Cross-reference: Figure AST-001 (KOP Location Map); Figure AST-002 (Scenic Resources Map); Figures AST-004 through AST-009 (KOP Photographs).



RB Datacenter
Mitigation

Sensitive Species Observations

Inyokern, CA
Kern County

- Project Site
- Gen-Tie Route
- Point of Interconnection
- Project Site Radius (6 miles)
- cnddb_dis_w2
- CNAME
- American badger
- Burrowing owl
- Desert tortoise
- Le Conte's thrasher
- Mohave ground squirrel
- Prairie falcon
- Charlotte's phacelia
- Latimer's woodland-gilia



RB Datacenter

Tortoise and Mohave Ground
Squirrel Habitat

Inyokern, CA
Kern County

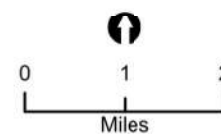
- Project Site
- Point of Interconnection
- Gen-Tie Route
- Project Site Radius (6 miles)

Potential Tortoise Habitat

- 0.0
- 0.1
- 0.2
- 0.3
- 0.4
- 0.5
- 0.6
- 0.7
- 0.8
- 0.9
- 1.0

Mohave Ground Squirrel
Important Areas

- MGS Expansion Area
- Key Population Center
- Linkage
- MGS Range



RB Datacenter
Mitigation

Hydrology

Tynokern, CA
Kern County

- Project Site
 - Gen-Tie Route
 - Point of Interconnection
 - Project Site Radius (6 miles)
- Hydrology Features
- Pipeline
 - StreamRiver (Wash)



RB Datacenter

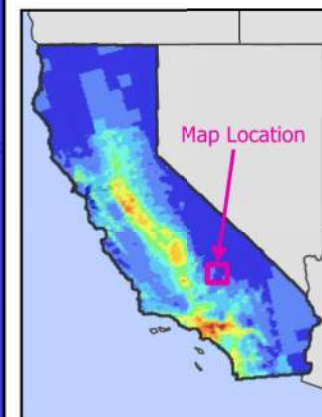
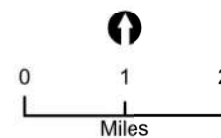
Nitrogen Deposition

Inyokern, CA
Kern County

- Project Site
- Point of Interconnection
- Gen-Tie Route
- Project Site Radius (6 miles)

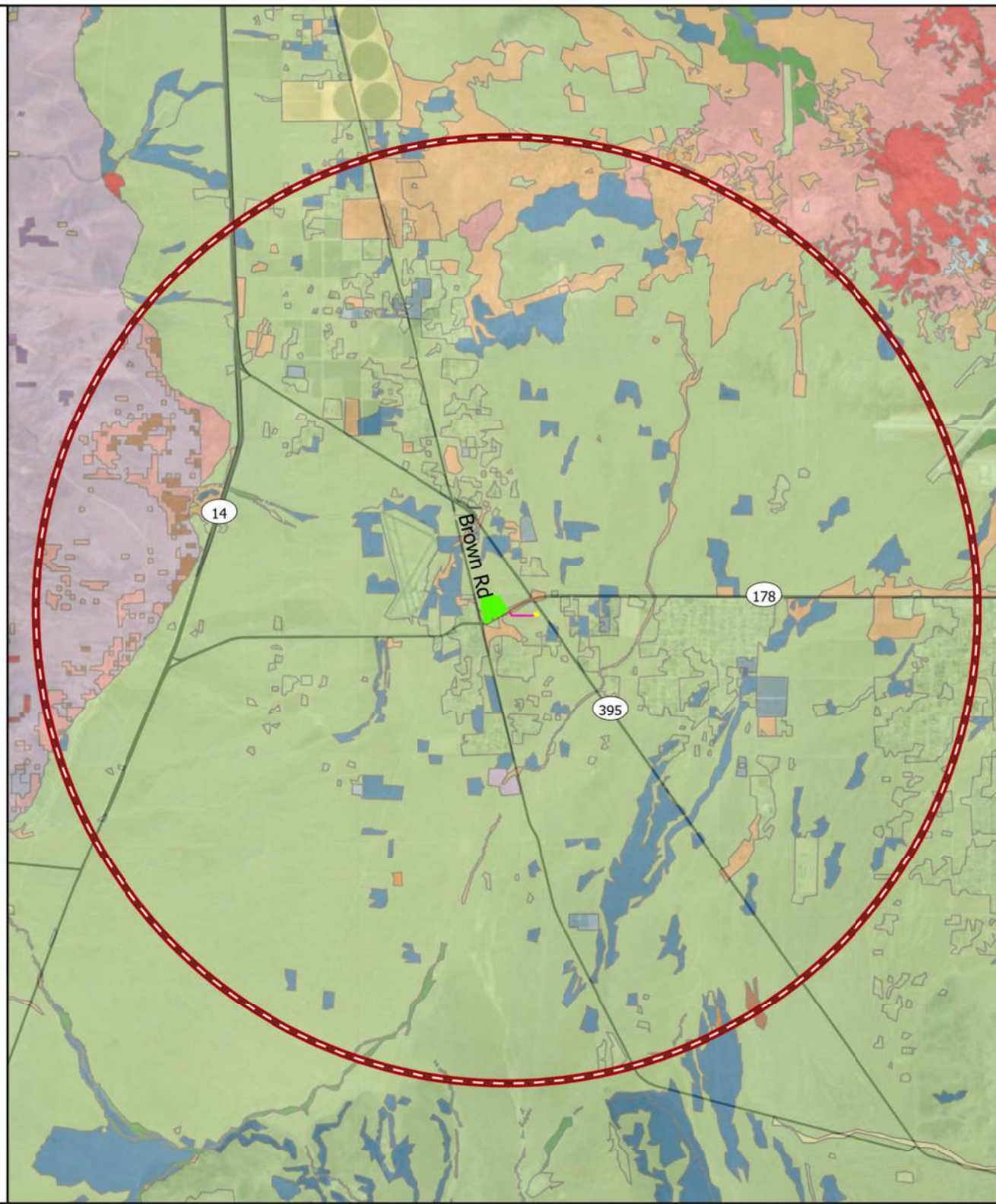
Kilograms of Nitrogen, per
hectare, per year

- < 3
- 3 - 5
- 5 - 7
- 7 - 9
- 9 - 11
- 11 - 15
- 15 - 19
- 19 - 25
- > 25



Vegetation / Land Cover

- Allenrolfea occidentalis*
- Ambrosia dumosa*
- Ambrosia salsola*
- Atriplex canescens*
- Atriplex confertifolia*
- Atriplex parryi*
- Atriplex polycarpa*
- California annual & perennial grassland (native component) Mapping Unit
- California annual herb/grass
- Californian broadleaf forest and woodland
- Californian montane conifer forest
- Chorizanthe rigida* - *Geraea canescens*
- Deciduous Orchard, Vineyard
- Developed and Disturbed Areas
- Ericameria cooperi*
- Ericameria nauseosa*
- Eriogonum fasciculatum*
- Grayia spinosa*
- Great Basin Fynion - Juniper Woodland
- Gutierrezia sarothrae*
- Inter-Mountain Dry Shrubland and Grassland
- Intermountain Mountain Big Sagebrush Shrubland and steppe
- Irrigated Row and Field Crops
- Krascheninnikovia lanata*
- Lacustrine
- Larrea tridentata*
- Larrea tridentata* - *Ambrosia dumosa*
- Lepidospartum squamatum*
- Lower Bajada and Fan Mojavean - Sonoran desert scrub
- Madrean Warm Semi-Desert Wash Woodland/Scrub
- Mediterranean California naturalized annual and perennial grassland
- North American Warm Desert Alkaline Scrub and Herb Playa and Wet Flat
- North American warm desert bedrock cliff and outcrop
- Populus fremontii*
- Salazaria mexicana*
- Shadscale - saltbush cool semi-desert scrub
- Southwestern North American introduced riparian scrub
- Suaeda moquinii*
- Urban
- Yucca brevifolia*

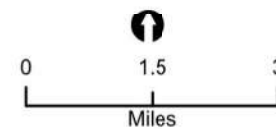


RB Datacenter
Mitigation

Vegetation

Inyokern, CA
Kern County

- Project Site
- Gen-Tie Route
- Point of Interconnection
- Project Site Radius (6 miles)



Map Location

Farmland Mapping and Monitoring Program, Division of Land Resource Protection, California Department of Conservation, Sources: Esri, TomTom,

FARMLAND MAPPING AND MONITORING PROGRAM (FMMP) — KERN COUNTY, CALIFORNIA

Agriculture and Forestry Resources | CEQA / CEC Small Power Plant Exemption (SPPE) Environmental Review

RB Inyokern Data Center | Inyokern, Kern County, CA | Source: CA DOC FMMP 2022 — gis.conservation.ca.gov/server/rest/services/DLRP/CaliforniaImportantFarmland_2022/FeatureServer

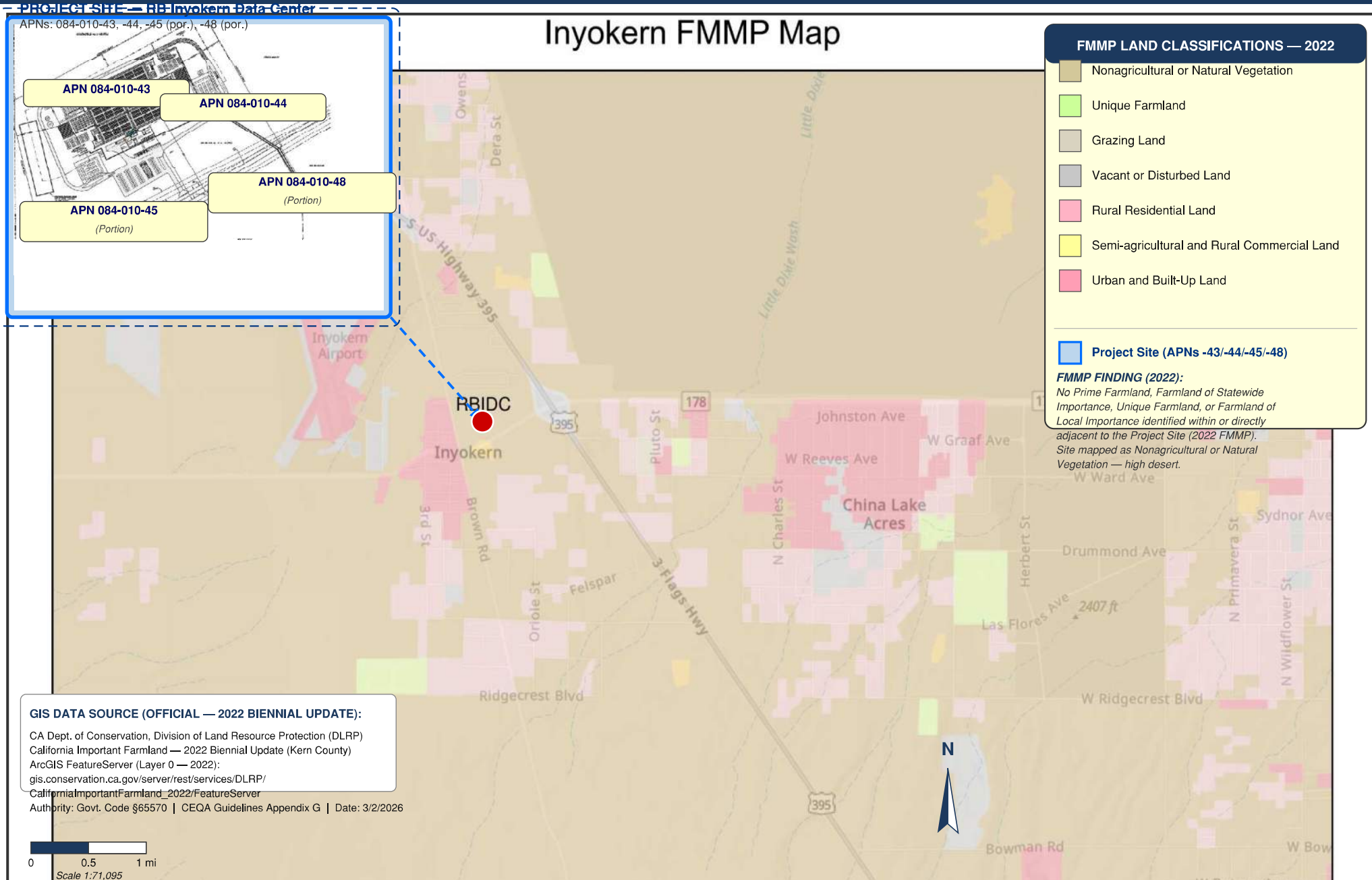


FIGURE NO.: FMMP-1

PROJECT: RB Inyokern Data Center

APNs: 084-010-43 | 084-010-44 | 084-010-45 (por.) | 084-010-48 (por.)

Data: CA Dept. of Conservation FMMP 2022 Biennial Update (Kern County); USDA-NRCS SSURGO; Kern County Assessor; Esri, TomTom; Site plan provided by project applicant.

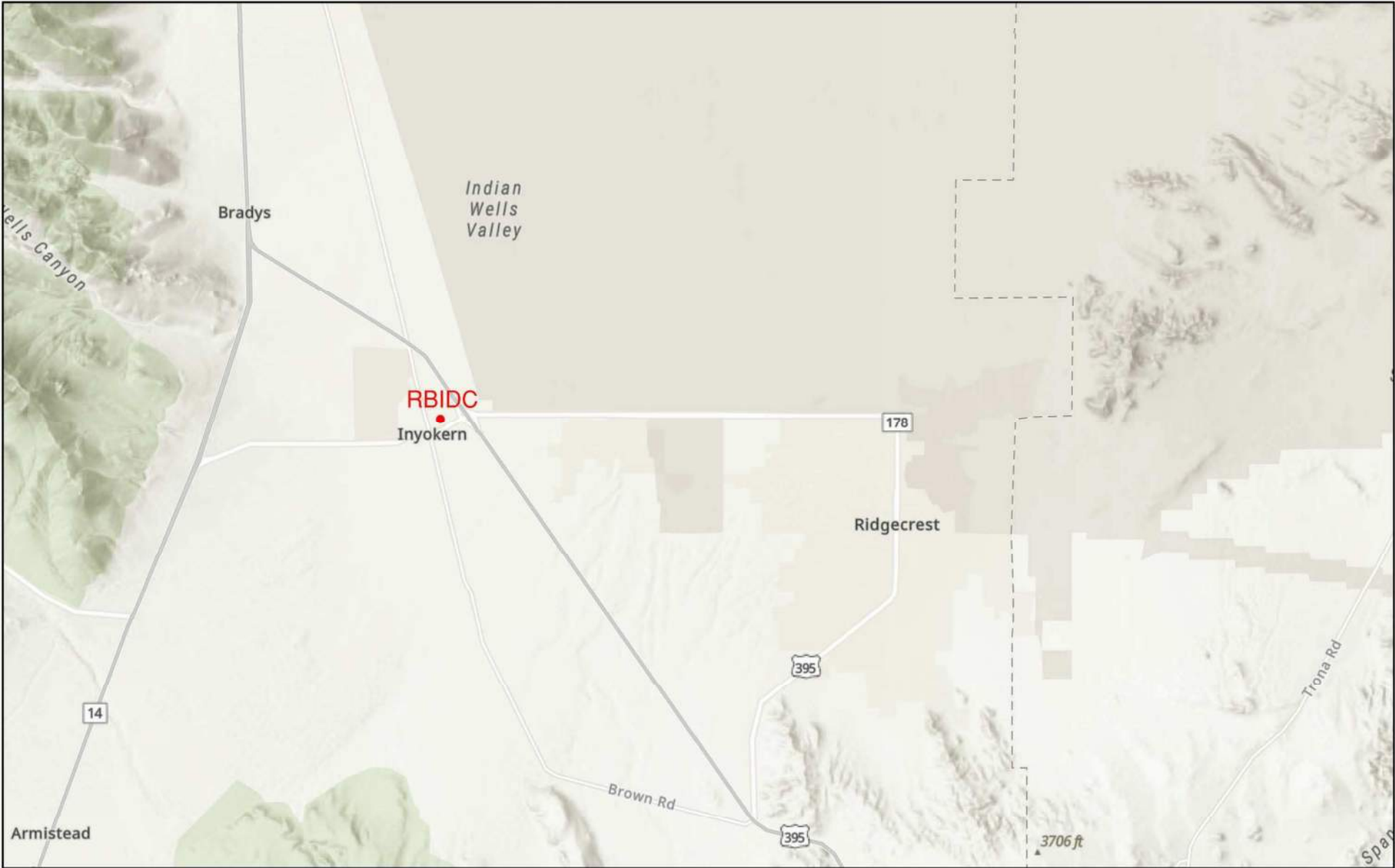
COORDINATE SYSTEM: GCS WGS 1984 (EPSG:4326)

LOCATION: Inyokern, Kern County, California

SITE CENTROID: 35.6469°N / 117.8125°W | Scale: 1:71,095

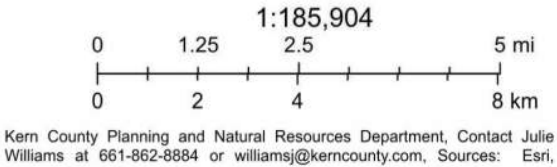
CEQA Lead Agency: California Energy Commission (CEC)

Inyokern Williamson Act Map



3/2/2026

World_Hillshade



WILLIAMSON ACT BOUNDARY MAP - PROJECT SITE LOCATION

INYO KERN DATA CENTER · R&L Capital, Inc. · Inyokern, Kern County, CA · APNs: 084-010-43, -44, -45 & -48 (PTN) · T265 R39E Sec. 29, MDM

Prepared for:
CEC Small Power Plant Exemption (SPPE) Application
Project No. 160268 · Date: March 2026
Coordinate System: WGS84 / NAD83 · 1 of 1

FIGURE 1 - Regional Williamson Act Boundary Map
Source: Kern County Planning & Natural Resources Dept. (3/2/2026) | Scale approx. 1:175,000

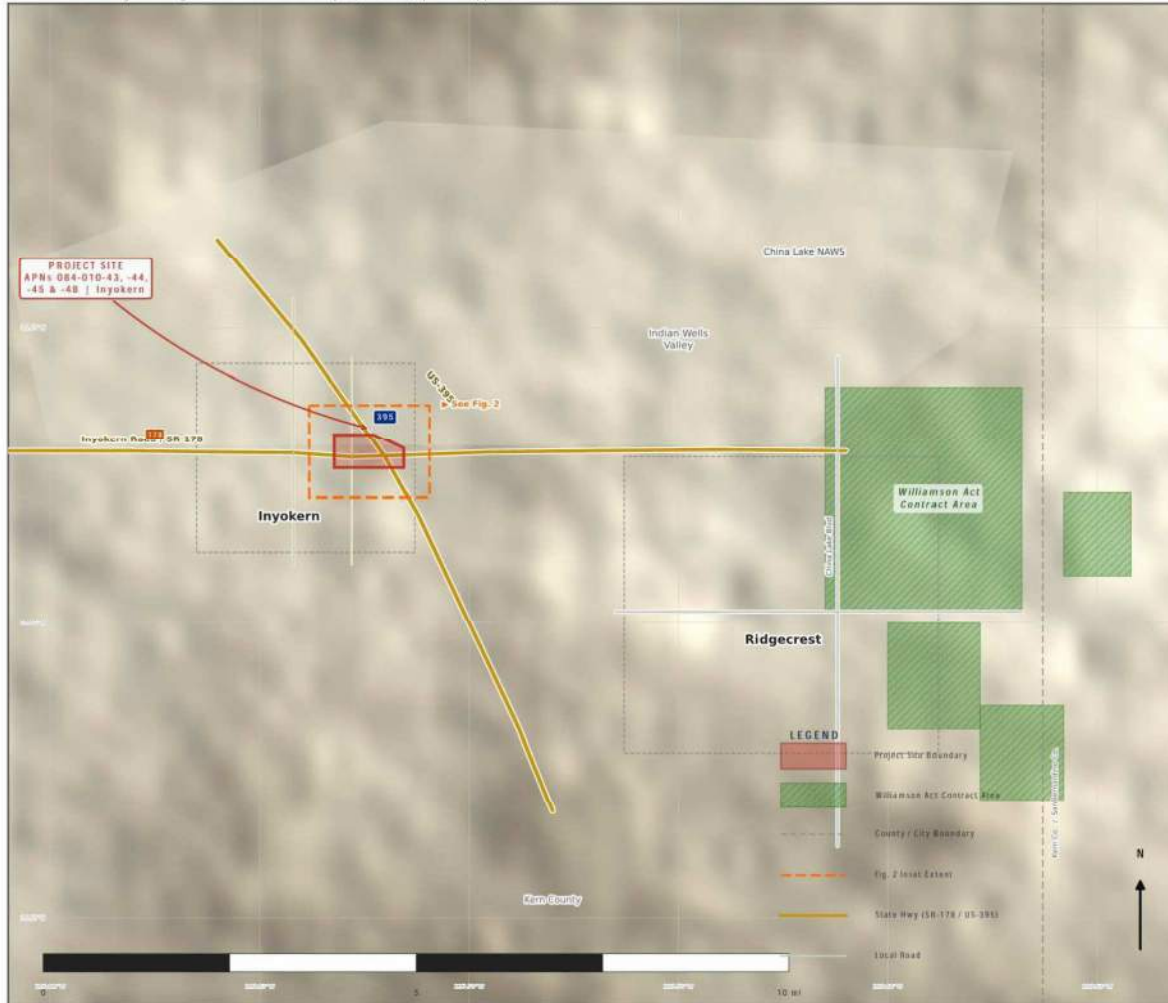


FIGURE 2 - Project Parcel Detail
Kern Co. Assessor Map 84-01 | R&L Capital Site Plan 160268-05 | Scale approx. 1:18,000



✓ **FINDING:** The project site (APNs 084-010-43, -44, -45 & -48) is NOT located within a Williamson Act Contract Area.

As depicted on the Kern County Williamson Act Boundary Map (Figure 1 above), the project parcels located in Inyokern, Kern County, California fall entirely outside all designated Williamson Act contract lands in the Indian Wells Valley region. The nearest Williamson Act contract area is located approximately 7.5 miles east of the project site, near Ridgecrest.

The project is NOT subject to Williamson Act cancellation requirements (Gov. Code §51282), and no agricultural land conservation contract compatibility review is required. This map is submitted as a supporting exhibit for the CEC Small Power Plant Exemption (SPPE) application for the Inyokern Data Center facility.

Sources: Kern County Planning & Natural Resources Dept. - Williamson Act Boundary Map (3/2/2026, 1 William, 067, 062, 0000) · Kern Co. Assessor Map Book 84-01 (Rev. Nov. 21, 2013) · R&L Capital Inc. Conceptual Site Plan 160268-05 (1/17/2026) · WSD00496000

TIMBER PRODUCT ZONE MAP — AGRICULTURE & FORESTRY RESOURCES

USFS Timber Zones · CAL FIRE TPZ Verification (PRC §4526) · CA DOC FMMP 2022 · CEQA Appendix G Section II · Kern County Lead Agency

PROJECT SITE — RB INYOKERN DATA CENTER

35.6469°N / 117.8125°W | Inyokern, Kern County, CA

APNs: 084-010-43 | -44 | -45 (por.) | -48 (por.)

FIGURE A — REGIONAL CONTEXT

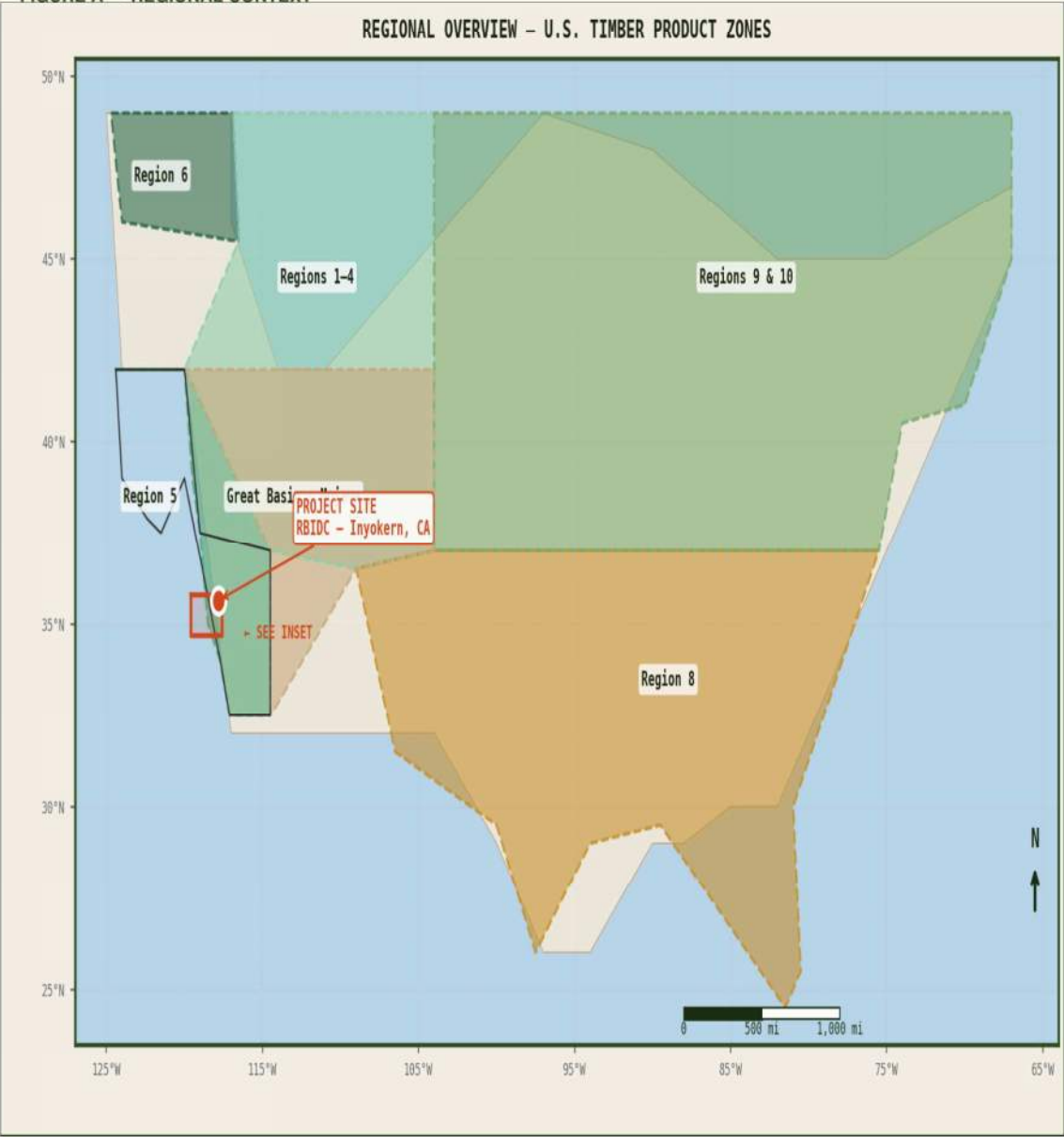


FIGURE B — LOCAL INSET (KERN COUNTY)



LEGEND — TIMBER PRODUCT ZONES

Pacific Northwest (R6)	Pacific Southwest / CA (R5)	Rocky Mountain (R1-4)	Southern (R8)	Northeastern / Lake States	Non-Forest / Arid Zone	Project Site (RBIDC)
Douglas Fir · W. Hemlock · Sitka Spruce	Ponderosa Pine · Sugar Pine · Redwood	Lodgepole Pine · Engelmann Spruce · Aspen	Loblolly · Longleaf · Slash Pine	White Pine · Sugar Maple · Yellow Birch	Pinyon Pine · Utah Juniper · Desert Willow	Non-Forest / Arid Transition Zone
Lumber · Plywood · Pulpwood	Lumber · Poles · Veneer · Biomass	Lumber · Poles · Engineered Wood	Pulpwood · Lumber · Plywood · OSB	Hardwood Lumber · Pulpwood · Veneer	Minimal commercial timber (limited)	No TPZ Designation — NO IMPACT (CEQA)

TIMBERLAND PRODUCTION ZONE (TPZ) MAP — AGRICULTURE & FORESTRY R

CAL FIRE TPZ Verification (PRC §4526) · Kern County Zoning · CEQA Appendix G Section II(c) · Kern County Lead Agency · No Impact Finding

PROJECT SITE — RB INYOKERN DATA CENTER

35.6469°N / 117.8125°W | Inyokern, Kern County, CA
APNs: 084-010-43 | -44 | -45 (por.) | -48 (por.)

FIGURE A — CALIFORNIA TPZ DISTRIBUTION

CALIFORNIA — CAL FIRE TIMBERLAND PRODUCTION ZONE (TPZ) DISTRIBUTION

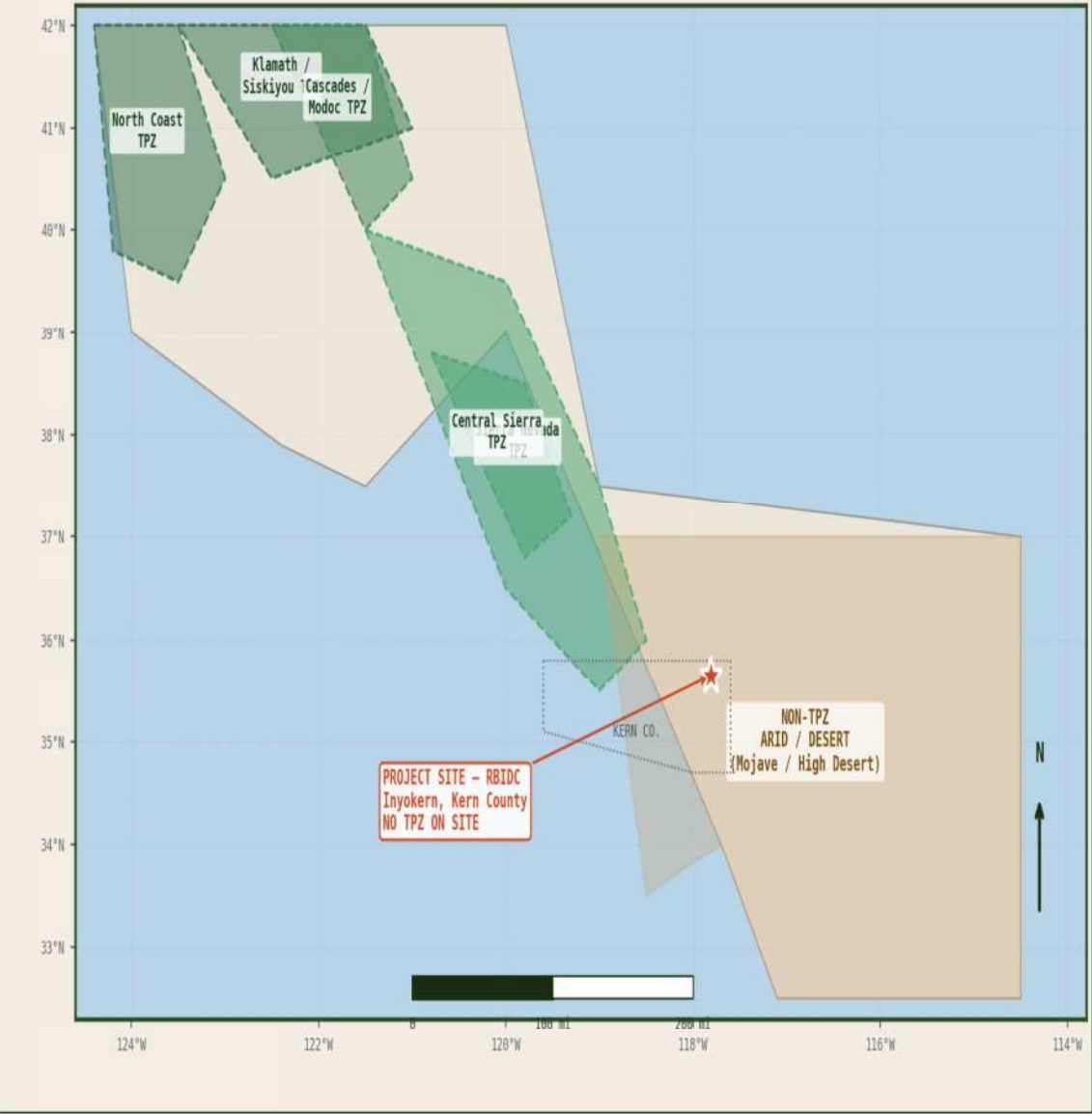
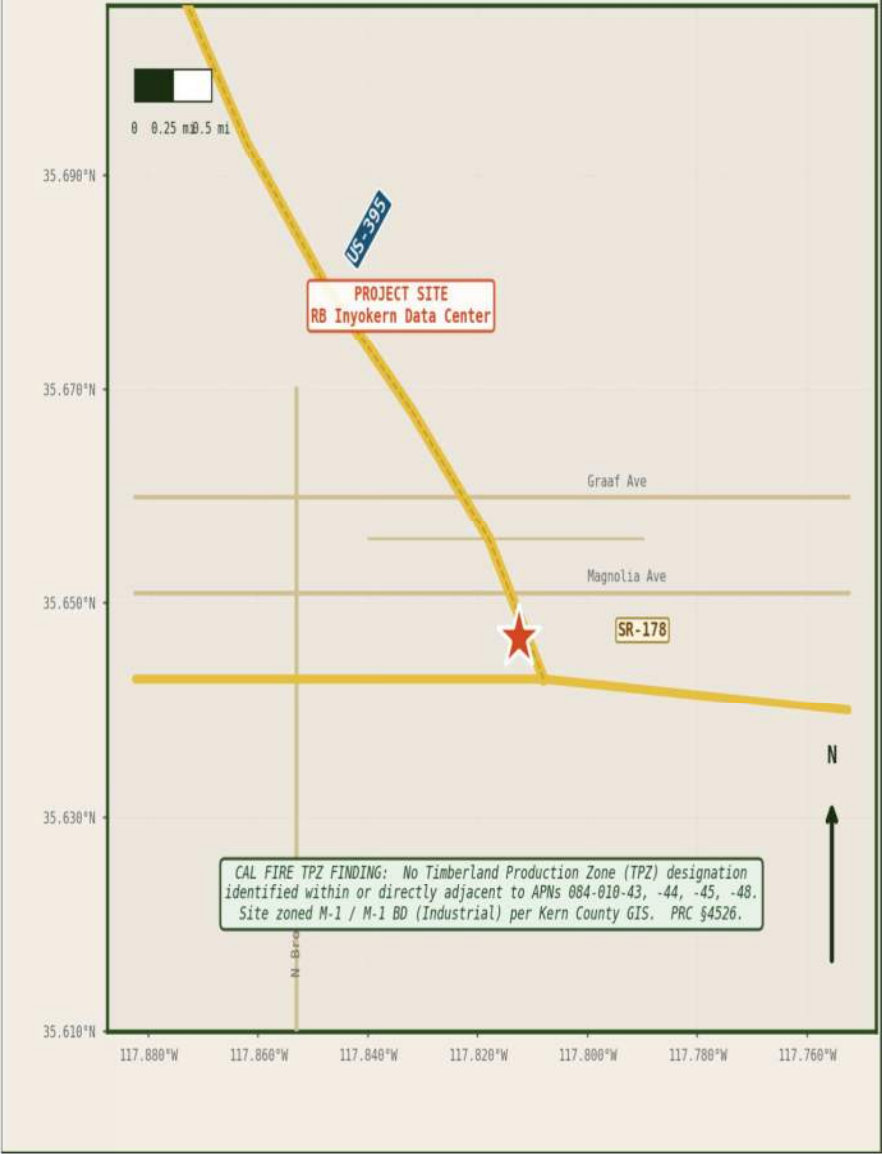


FIGURE B — PROJECT PARCELS (KERN COUNTY GIS, 1:18,056)

LOCAL VICINITY — INYOKERN, KERN COUNTY | Scale 1:18,056 | Source: Kern County GIS



LEGEND — TIMBERLAND PRODUCTION ZONE (TPZ) VERIFICATION



CA TPZ Designated Areas

CAL FIRE designated Timberland Production Zones (PRC §4526) — primarily N. Coast, Klamath, Sierra



Non-Forest / Arid Zone

Non-TPZ desert & arid lands — no commercial timber production; includes Mojave / High Desert



Project Site (RBIDC)

RB Inyokern Data Center — 35.6469°N / 117.8125°W
APNs: 084-010-43 | -44 | -45 (por.) | -48 (por.)



US-395 / SR-178

Primary roadways — US Highway 395 (diagonal NW-SE) and State Route 178 (E-W); site NW of junction

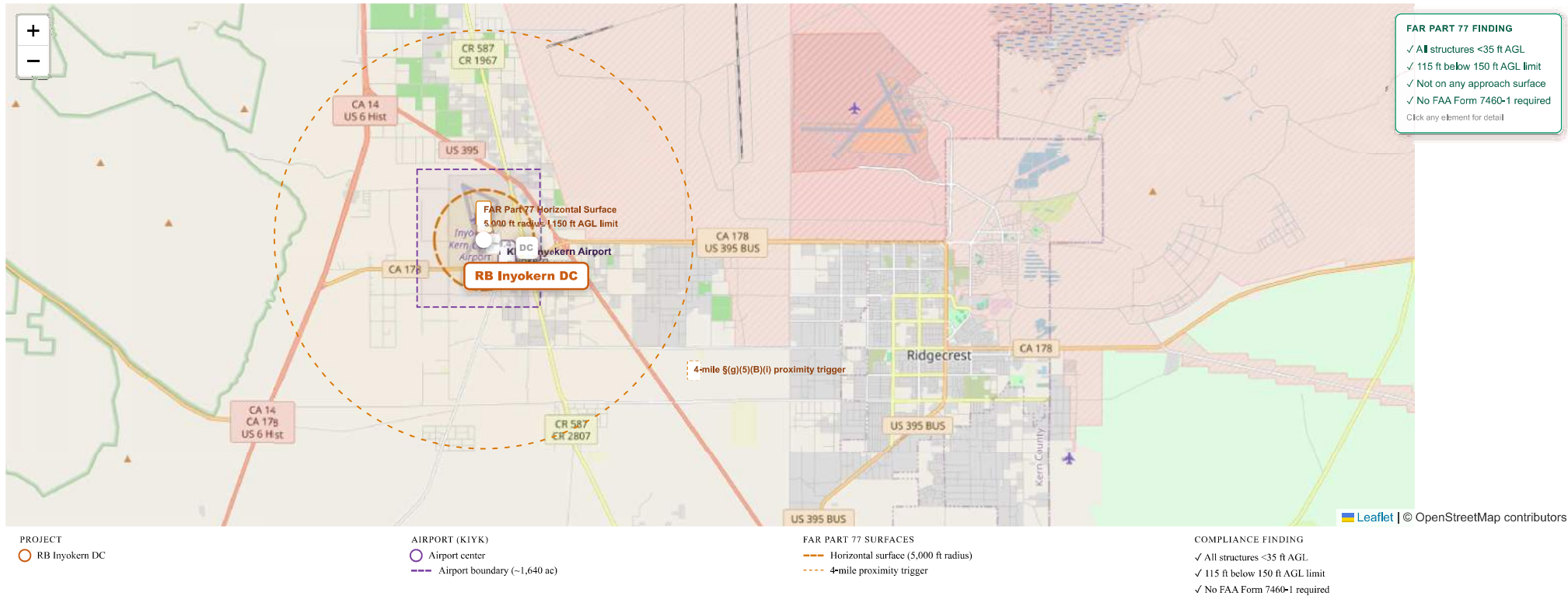


TPZ FINDING: NO IMPACT

No Timberland Production Zone identified per CAL FIRE TPZ GIS (2024). CEQA Appendix G §II(c). No Impact.

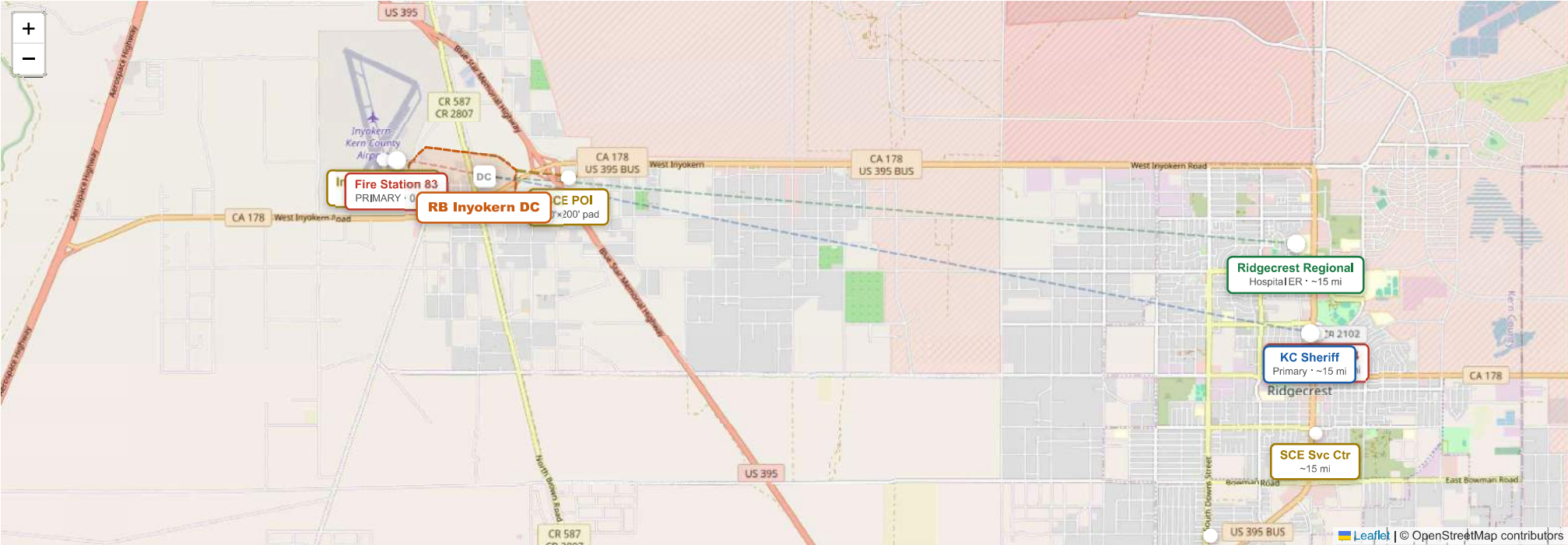
Figure T-2 — Airport Proximity Map | Appendix B §(g)(5)(B)(i)
RB Inyokern Data Center | KIYK Inyokern Airport | FAR Part 77 Imaginary Surfaces | Kern County, CA

Figure T-2 | §(g)(5)(B)(i)



RB Inyokern Data Center — Appendix B(g)(7) Public Services
CEC/SPPE | APNs 084-010-43,-44,-45,-48 | 35°39'0.66"N / 117°48'33.35"W | Kern County, CA

- Fire
- Sheriff
- Medical
- Utility / Airport



FIRE — PRIMARY
KC Fire Station 83
~0.5 mi · (760) 377-4621

FIRE — MUTUAL AID
KC Fire Stns 84 & 81
~15-17 mi · (661) 391-7000

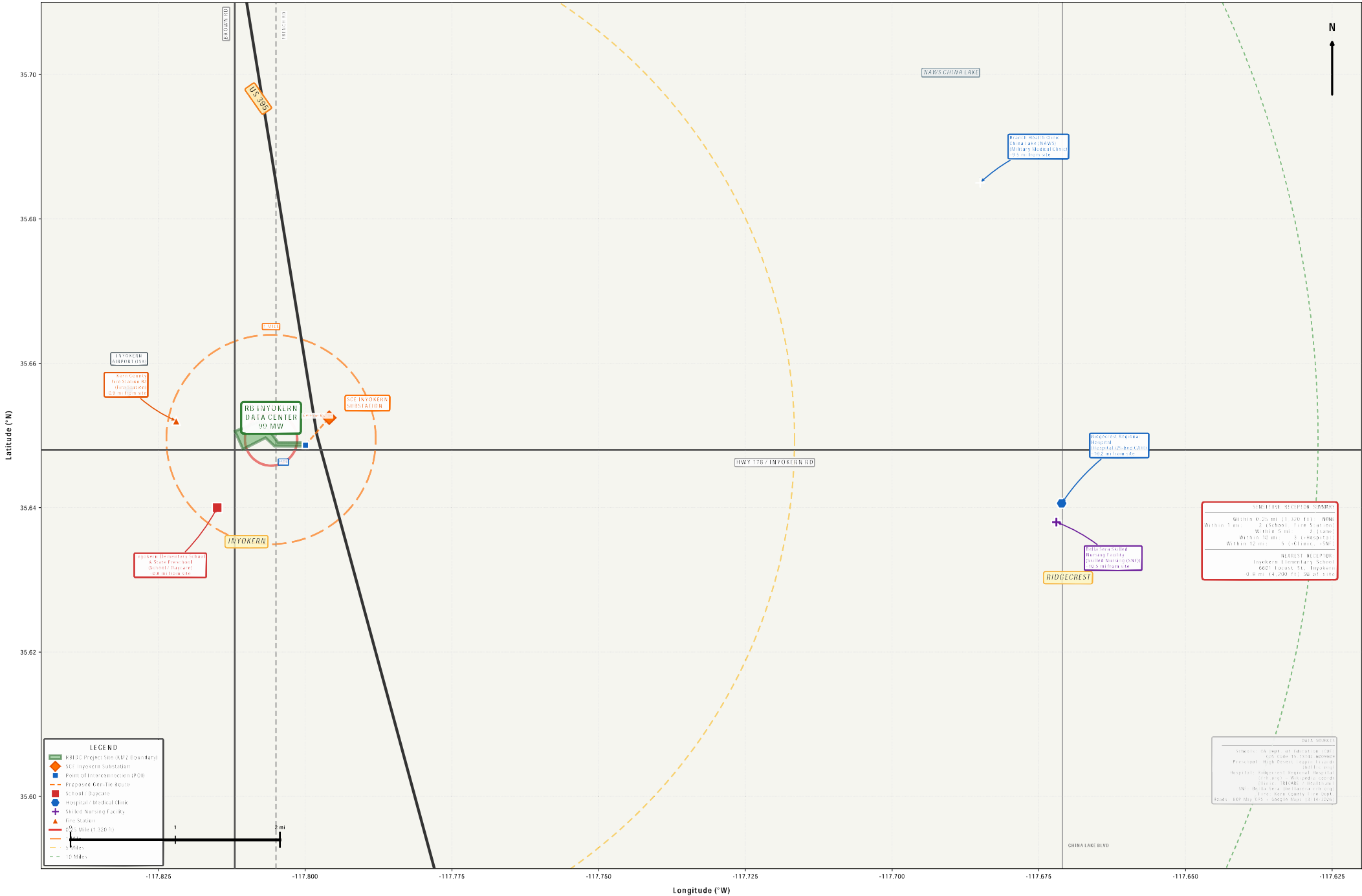
LAW ENFORCEMENT
KC Sheriff — Ridgecrest
~15 mi · (760) 384-5800

EMERGENCY MEDICAL
Ridgecrest Regional Hospital
~15 mi · (760) 446-3551

SCE EMERGENCY
1-800-611-1911
115 kV · 24/7

APPENDIX B §(g)(10)(B) — SENSITIVE RECEPTOR MAP

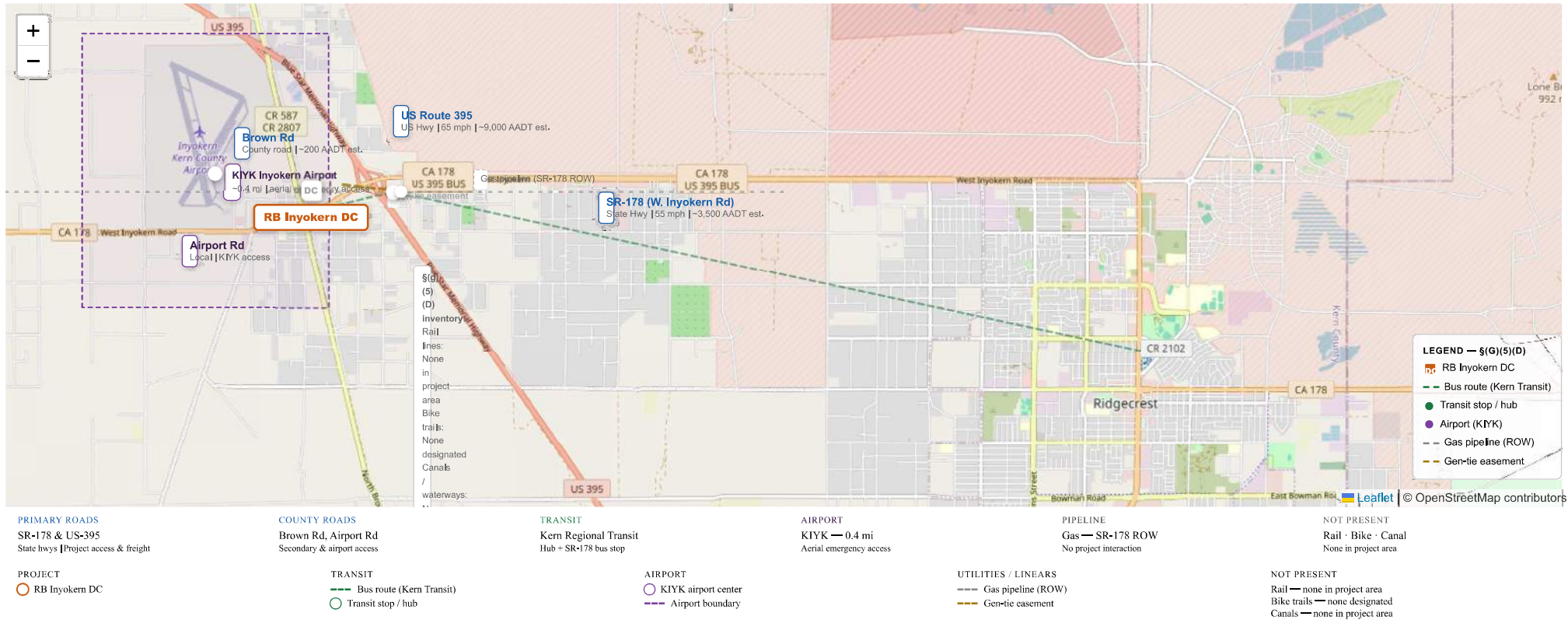
RB Inyokern Data Center — 99 MW SPPE Application
Hazardous Materials: Schools, Hospitals, Daycare, and Long-Term Care Facilities
Inyokern, Kern County, California



Project boundary from KOP Map (KOPMapUpdate31426km). Road positions verified via KOP Map field-confirmed GPS and Google Maps (March 14, 2016).
Receptor locations from CA Dept. of Education, YBCARE, Ridgecrest Regional Hospital, Kern County Fire Dept.
Distances measured from project centroid. Prepared for Valley Wide Engineering & Construction Services, Inc.

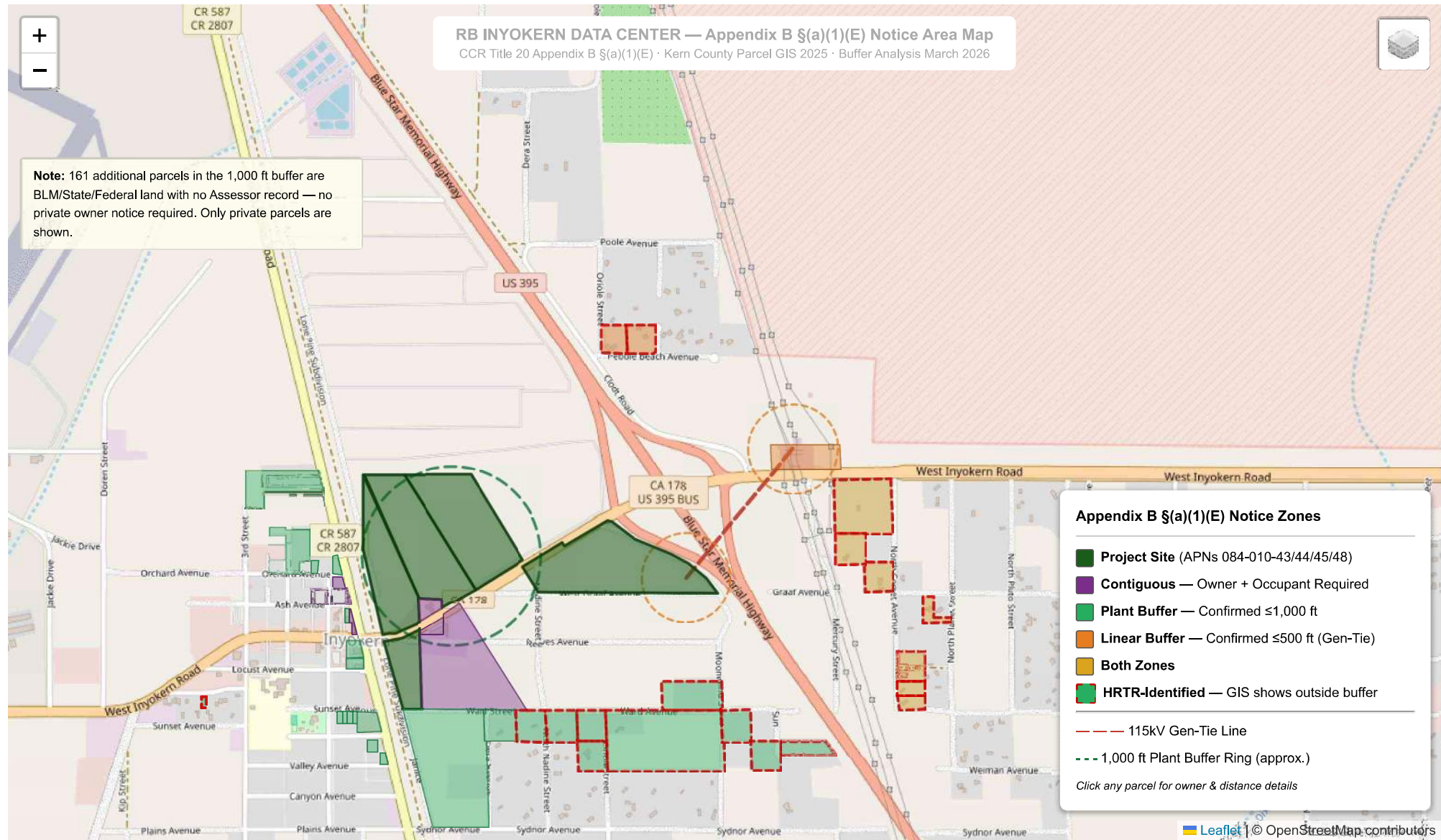
Figure T-4 — Transportation Facility Inventory | Appendix B §(g)(5)(D)
RB Inyokern Data Center | Transit, Airport, Pipelines, Linear Facilities | Kern County, CA

Figure T-4 | §(g)(5)(D)



RB Inyokern Data Center — 99 MW SPPE Application
State Responsibility Area (SRA), Local Responsibility Area (LRA), and FHSZ Boundaries
Inyokern, Kern County, California





RB INYOKERN DATA CENTER — PARCEL OWNER NOTICE LIST											
CCR Title 20, Appendix B §(a)(1)(E) GIS Buffer Analysis: Kern County Parcels 2025 (ArcGIS), Polygon-to-Polygon Distance KernData.com Owner Lookup March 13, 2026 Project Centroid: 35.64948°N, 117.80897°W											
CONTIGUOUS (C) — Property sharing a boundary with project site. OWNER + OCCUPANT mailing address required.											
PLANT BUFFER (P) — GIS-confirmed within 1,000 ft of project boundary.											
LINEAR BUFFER (L) — GIS-confirmed within 500 ft of 115kV gen-tie line.											
BOTH ZONES (B) — May fall in both buffers; GIS-verified distances shown.											
HRTR-IDENTIFIED / OUTSIDE GIS BUFFER (H) — HRTR includes parcel; GIS analysis places it >1,000 ft. Included conservatively. Confirm with licensed surveyor.											
#	APN	Owner of Record	Owner Mail Street	Owner Mail City/State/ZIP	Occupant Name (if diff.)	Occupant Address (if diff.)	Notice Zone	Situs / Property Address	GIS Dist to Site (ft)	GIS Dist to Gen-Tie (ft)	Notes
PROJECT SITE											
—	084-010-43	R & L CAPITAL INC	P O BOX 907	TRONA CA 93592	(same as owner)		PROJECT SITE (Applicant)	S of W Inyokern Rd / W of Brown Rd	0	4100	Applicant parcel — no outbound notice required
—	084-010-44	R & L CAPITAL INC	P O BOX 907	TRONA CA 93592	(same as owner)		PROJECT SITE (Applicant)	S of W Inyokern Rd / W of Brown Rd	0	4200	Applicant parcel — no outbound notice required
—	084-010-45	R & L CAPITAL INC	P O BOX 907	TRONA CA 93592	(same as owner)		PROJECT SITE (Applicant)	S of W Inyokern Rd / W of Brown Rd	0	4300	Applicant parcel (portion) — no outbound notice required
—	084-010-48	R & L CAPITAL INC	P O BOX 907	TRONA CA 93592	(same as owner)		PROJECT SITE (Applicant)	E of Brown Rd — SCE POI site	0	0	SCE POI parcel — per J.1 Phase I ESA (BSK E25001187) and Base Map QK Dwg 160268-05
CONTIGUOUS											
1	084-010-58-6	RIZZARDINI HERBERT M & VICKI JT LIV TR	830 HOWELL W AV	RIDGECREST CA 93555-3359	GATEWAY HARDWARE (Herbert Rizzardini, owner-76 GAS STATION (Dillon Enterprises Inc., operator)	6259 Highway 178, Inyokern, CA 93527	CONTIGUOUS — Owner + Occupant Required	6259 CALIFORNIA HWY 178	0	4200	Contiguous — N boundary Hwy 178, GIS confirmed, Occupant: Gateway Hardware
2	084-010-59-4	DILLON ENTERPRISES INC	178 VALLEY VIEW DR	EXETER CA 93221		6260 Highway 178, Inyokern, CA 93527	CONTIGUOUS — Owner + Occupant Required	6260 CALIFORNIA HWY 178	0	4300	Contiguous — N boundary Hwy 178, GIS confirmed, Occupant: 76 Gas Station operated by
3	084-010-46-1	RIZZARDINI HERBERT M & VICKI LIV TRUST	830 HOWELL W AV	RIDGECREST CA 93555-3359	(vacant land — no occupant)	(vacant — no occupant mailing address applicable) → 1429 Brown N Rd, Inyokern, CA 93527 (if	CONTIGUOUS — Owner + Occupant Required	(no situs — vacant)	0	4000	Contiguous — adj, project boundary, GIS confirmed, Parcel is vacant land (no situs
4	084-152-05-7	MARSHALL BILL H & BARBARA L	P O BOX 38	INYOKERN CA 93527	TBD	→ 1447 Brown N Rd, Inyokern, CA 93527 (if	CONTIGUOUS — Owner + Occupant Required	1429 BROWN N RD	0	3500	Contiguous — E boundary Brown Rd, GIS confirmed, Owner mailing is PO Box 38,
5	084-152-02-4	JACOBS TIMOTHY D 2018 TR	219 STATION AV	RIDGECREST CA 93555-3839	TBD	→ 1401 Brown N Rd, Inyokern, CA 93527 (situs —	CONTIGUOUS — Owner + Occupant Required	1447 BROWN N RD	0	3600	Contiguous — E boundary Brown Rd, GIS confirmed, Owner (Jacobs Trust) mails to
6	084-140-09-4	FARRIS FREDERICK PAUL & SUSAN E	140 RIDGECREST W BL	RIDGECREST CA 93555	TBD	→ 1401 Brown N Rd, Inyokern, CA 93527 (situs —	CONTIGUOUS — Owner + Occupant Required	1401 BROWN N RD	130	3700	Contiguous — E boundary Brown Rd, GIS: 130 ft. Owner (Farris) mails to Ridgcrest. LoopNet
PLANT BUFFER — GIS Confirmed ≤1,000 ft											
7	084-140-02-9	FARRIS FREDERICK P & SUSAN E ET AL	140 RIDGECREST W BL	RIDGECREST CA 93555	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	101 ASH AV	296	3541	GIS: 296 ft to site boundary
8	084-040-02-1	EL SOLANA MOBILE HOME AND RV PARK LLC	2283 MAZIE E AV	FRESNO CA 93730	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1661 BROWN N RD	298	3613	GIS: 298 ft. Mobile home/RV park — 48 units. Owner Fresno CA.
9	084-040-29-4	WHEELER TRUST	142 ELMCREST DR	BIG PINE CA 93513-2004	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1509 BROWN N RD	298	3613	GIS: 298 ft. Owner Big Pine CA.
10	084-211-14-3	TAMAYO ARTHUR	319 NORTH ST	TAFT CA 93268	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1233 BROWN N RD	310	3200	GIS: 310 ft. Owner Taft CA.
11	084-211-02-8	MANGRUM DIANE E	PO BOX 1472	INYOKERN CA 93527-1472	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6521 SUNSET AV	420	2900	GIS: 420 ft
12	084-211-03-6	SEMBACH BETTYE RIVERA	P O BOX 1956	RIDGECREST CA 93555	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6517 SUNSET AV	440	2880	GIS: 440 ft
13	084-211-04-4	SODEN LINDA	P O BOX 273	INYOKERN CA 93527	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6513 SUNSET AV	460	2860	GIS: 460 ft
14	084-211-05-1	HAHN IRMA	321 PERDEW AV	RIDGECREST CA 93555-2514	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	109 SUNSET AV	480	2840	GIS: 480 ft
15	084-212-25-7	MC MURTRIE SJ TRUST	PO BOX 2199	RIDGECREST CA 93556	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6465 SIERRA AV	500	2700	GIS: 500 ft
16	084-212-09-1	FILLMORE SHANNON	1201 BROWN RD	INYOKERN CA 93527	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1201 BROWN RD	580	3200	GIS: 580 ft
17	084-021-01-3	MONTOYA SANDRA & HENRY GEOVANI	1300 IOWA W AV	RIDGECREST CA 93555	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6331 SUNSET AV	610	2500	GIS: 610 ft
18	084-021-02-1	MURPHY PATRICK D	P O BOX 822	INYOKERN CA 93527-0822	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1244 DERA N ST	650	2400	GIS: 650 ft
19	084-040-32-8	AMS BSNS GROUP LLC	151 TRUXTUN E AV	BAKERSFIELD CA 93305	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1520 2ND ST	700	3800	GIS: 700 ft. Owner Bakersfield CA.
20	084-040-17-9	WEBB PAUL	PO BOX 32	INYOKERN CA 93527-0032	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6546 ORCHARD AV	720	4000	GIS: 720 ft
21	084-090-13-3	HUGAIS SALMAN A	P O BOX 1718	INYOKERN CA 93527	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	1353 BROWN RD	750	3300	GIS: 750 ft
22	084-090-10-9	APIF CALIFORNIA LLC	950 TOWER LN STE 750	FOSTER CITY CA 94404-2191	(same as owner)		PLANT BUFFER — GIS Confirmed ≤1,000 ft	6512 LOCUST AV	810	2200	GIS: 810 ft. Owner Foster City CA.
LINEAR BUFFER (Gen-Tie) — GIS Confirmed ≤500 ft											
23	352-502-23-1	SOUTHERN CALIF EDISON CO	2244 WALNUT GROVE AV	ROSEMEAD CA 91770-3714	(same as owner)		LINEAR BUFFER — GIS Confirmed ≤500 ft (Gen-Tie)	INYOKERN SUBSTATION	1917	0	SCE POI destination — substation parcel, GIS: 0 ft to gen-tie.
HRTR-IDENTIFIED — GIS Outside Required Buffer (include conservatively)											
24	084-010-37-0	FRANKLIN OWETTA	P O BOX 552	INYOKERN CA 93527	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1317 MOONWIND N ST	1011	1588	GIS: 1,011 ft (11 ft outside 1,000 ft threshold). Include — within measurement margin.
25	084-021-06-2	CHRISTIANSEN AARON A	1249 NADINE NO ST	INYOKERN CA 93527	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1249 NADINE N ST	1055	2325	GIS: 1,055 ft from site. HRTR-identified. Include conservatively.
26	084-060-15-0	HART JOHN M	BX 144	INYOKERN CA 93527	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	6737 MOUNTAIN VIEW AV	1055	2060	GIS: 1,055 ft from site. HRTR-identified. Include conservatively.
27	084-021-14-6	SPRADLIN DOUNGCHAI	600 5TH SW CT APT K104	RENTON WA 98057-2368	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	(no situs address)	1346	2080	GIS: 1,346 ft. HRTR-identified. Owner Renton WA. Include conservatively.
28	084-022-14-4	SMITH GARY D	1226 SUN ST	INYOKERN CA 93527	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1226 SUN N ST	1346	2014	GIS: 1,346 ft. HRTR-identified. Verify ZIP 93257 vs 93527. ZIP corrected 93257→93527

29	084-021-10-4	WARREN CLEAVE R	P O BOX 2033	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	(no situs)	1343	2159	GIS: 1,343 ft. HRTR-identified. No situs address.
30	084-022-01-1	MARTIN RANDELL & ALLEN-MARTIN RANDI J	6501 SUNSET AV	INYOKERN CA 93527	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	6501 SUNSET AV	1337	2074	GIS: 1,337 ft. HRTR-identified. Include conservatively.
31	084-022-10-2	COPELAND MARSHA C	5853 WARD AV	INYOKERN CA 93527-2925	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	5853 WARD AV	1337	2080	GIS: 1,337 ft. HRTR-identified. Include conservatively.
32	084-021-15-3	VANCE RONALD A & JEPHINE M	PO BOX 1664	INYOKERN CA 93527-1664	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1217 ORIOLE N ST	1685	2325	GIS: 1,685 ft. HRTR-identified. Include conservatively.
33	084-022-19-3	HITZ ERNEST & CHRISTINE	5831 DELBERT AV	INYOKERN CA 93527	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	5831 DELBERT AV	1728	2571	GIS: 1,728 ft. HRTR-identified. Include conservatively.
34	352-502-12-4	HEPPE BEN & ANGELA L	1925 BLACKBIRD ST	INYOKERN CA 93527-2800	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1925 BLACKBIRD N ST	1917	130	GIS: 130 ft to gen-tie, 1,917 ft to site. Near substation. Include.
35	352-502-08-2	AVS INV PROP LLC	6068 PEBBLE BEACH AV	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	6068 PEBBLE BEACH AV	1940	195	GIS: 195 ft to gen-tie, 1,940 ft to site. Near substation. Include.
36	352-310-15-5	NICHOLLS KYLER	1540 MERCURY N ST	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1540 MERCURY N ST	1368	1169	GIS: 1,368 ft to site, 1,169 ft to gen-tie. Outside both buffers — include per HRTR.
37	352-310-11-4	WARD DONALD L & DEANN	PO BOX 339	RIDGECREST CA 93556-0339	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	5631 INYOKERN RD	1482	1034	GIS: 1,482 ft to site, 1,034 ft to gen-tie. Outside both buffers — include per HRTR.
38	352-310-14-8	BLAIR REVOCABLE LIVING TRUST	51 ABBOTT RD	ELMA WA 98541-9433	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1511 COMET ST	1689	1783	GIS: 1,689 ft to site. Owner Elma WA. Include per HRTR.
39	352-310-32-0	ASHLEY TWILA J	910 HUGHES W AV	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1372 COMET ST	2120	1350	GIS: 2,120 ft to site. Outside buffers — verify with surveyor before filing.
40	352-310-25-4	KING JERRY D	1344 COMET ST	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	1344 COMET N ST	2195	1050	GIS: 2,195 ft to site. Outside buffers — verify with surveyor.
41	352-310-23-9	GILLARD DONALD L	1475 PLANET N ST	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	5527 GRAAF AV	2240	1370	GIS: 2,240 ft to site. Outside buffers — verify with surveyor.
42	352-310-31-2	SPELL TYLER & JESSICA	5556 WARD W AV	RIDGECREST CA 93555	(same as owner)		HRTR-IDENTIFIED — GIS Outside Required Buffer	5556 WARD AV	2310	1280	GIS: 2,310 ft to site. Outside buffers — verify with surveyor.
BLM / STATE / FEDERAL — 161 parcels confirmed no Assessor record — no private notice required											
—	084-010-17	— BLM / STATE LAND —					BLM / STATE — No Private Notice Required	Adjacent to project site — no assessor record	—	—	Confirmed: no record in KernData.com (authenticated lookup Mar 2026). GIS parcel exists but no tax roll entry = BLM/federal/state.
—	084-010-18	— BLM / STATE LAND —					BLM / STATE — No Private Notice Required	Adjacent to project site — no assessor record	—	—	Same as above.
—	084-010-21	— BLM / STATE LAND —					BLM / STATE — No Private Notice Required	Adjacent to project site — no assessor record	—	—	Same as above.
—	084-010-22	— BLM / STATE LAND —					BLM / STATE — No Private Notice Required	Adjacent to project site — no assessor record	—	—	Same as above.
—	084-010-33	— BLM / STATE LAND —					BLM / STATE — No Private Notice Required	Adjacent to project site — no assessor record	—	—	Same as above.
—	084-010-35	— BLM / STATE LAND —					BLM / STATE — No Private Notice Required	Adjacent to project site — no assessor record	—	—	Same as above. (12 total BLM parcels from B.1 study area — all confirmed no-notice)
TOTAL NOTICE PARCELS:		42	23 GIS-confirmed within required buffer 19 HRTR-identified outside buffer (include conservatively) 161 BLM/State (no notice)								

APPENDIX N.2

Notification to Naval Air Weapons Station China Lake

R&L Capital, Inc., Applicant in Docket No. 26-SPPE-01 (RB Inyokern Data Center), provided formal notification to Naval Air Weapons Station (NAWS) China Lake, Community Plans & Liaison Officer, regarding the proposed project. The notification letter, dated April 21, 2026 and signed by Robbie Barker, Chief Executive Officer of R&L Capital, Inc., is included as Exhibit A. The letter was sent via USPS Certified Mail (Article No. 9589 0710 5270 0017 2676 15) and was received on April 27, 2026 by Lacey O'Grady of the NAWS China Lake Community Plans & Liaison Office, as confirmed by the Domestic Return Receipt (PS Form 3811) included as Exhibit B.

The notification was provided pursuant to California Government Code section 65352(a)(6) and Senate Bill 1462 (military notification), and supports the military compatibility showing required for the SPPE Application — including the project's consistency with applicable Airport Land Use Compatibility Plan (ALUCP) requirements and its compatibility with operations within the R-2508 Special Use Airspace Complex. See CEC SPPE Application Instructions, Appendix B, Section (g)(8).

Contents:

Exhibit A — Notification Letter to NAWS China Lake Community Plans & Liaison Officer, dated April 21, 2026

Exhibit B — USPS Domestic Return Receipt (PS Form 3811), Article No. 9589 0710 5270 0017 2676 15

Date: April 21, 2026

To:

Community Plans & Liaison Officer (CPLO)
Naval Air Weapons Station (NAWS) China Lake Headquarters
1 Administration Circle
China Lake, CA 93555

Subject: Formal Notification of Proposed Development: RB Inyokern Data Center (RBIDC)
Reference: California Government Code § 65352(a)(6) / SB 1462 Military Notification; CEC
Docket No. 26-SPPE-01

Dear Community Plans & Liaison Officer,

Pursuant to California Government Code § 65352(a)(6) and the requirements of Senate Bill 1462, R & L Capital, Inc. is providing formal notification of a proposed development project located within the vicinity of Naval Air Weapons Station (NAWS) China Lake and the R-2508 Special Use Airspace Complex. This notification is submitted in connection with the proposed RB Inyokern Data Center project.

The proposed project, the RB Inyokern Data Center (RBIDC), has filed a Small Power Plant Exemption (SPPE) application with the California Energy Commission (CEC) (Docket No. 26-SPPE-01), which will be processed first and then considered for a Conditional Use Permit (CUP) application (which is required instead of the Precise Development Plan) with the Kern County Planning & Natural Resources Department for consideration by the Kern County Planning Commission.

We recognize the critical importance of the NAWS China Lake mission and the R-2508 airspace. This notification is intended to proactively provide your office with the project's technical specifications to confirm compatibility with military aviation, testing, and training operations.

Project Location and Description

- Project Name: RB Inyokern Data Center (RBIDC)
- Location: SR-178 / Brown Road corridor (1401 W Graaf Ave), Inyokern, CA 93527 (APNs 084-010-43, -44, -45, and -48)
- Site Area: 50 acres
- Proximity: The site is located approximately 0.9 miles southeast of the Inyokern Airport (IYK) and approximately 0.5 miles southwest of the NAWA China Lake boundary:
 - Kern County Inyokern Specific Plan – 7.2/2.4 (Service Industrial/ Flood Hazard)
 - Kern County Zoning – M-2 PD (Medium Industrial – Precise Development Combing District)
- Facility: A 238,000 sq ft, single-story data center campus with a maximum operational load of 99 MW.

Vertical Profile and Airspace Compatibility

The project has been specifically designed with a low vertical profile to ensure compatibility with the adjacent Inyokern Airport and the overlying R-2508 airspace complex.

- Maximum Building Height: 30 feet above ground level (AGL).
- Cooling Infrastructure: 28 air-cooled chillers and adiabatic towers, all maintained below the 30-foot maximum roofline.
- Backup Generation: 40 Caterpillar 3516E diesel generators housed in sound-attenuated enclosures. The generator exhaust stacks will not exceed the 30-foot maximum building height.

The project site is located within Inyokern Airport Land Use Compatibility Plan (ALUCP) Zones B1 and C, and the proposed use has been determined compatible with the adopted ALUCP criteria.

A formal FAA Form 7460-1 (Notice of Proposed Construction or Alteration) evaluation determined that filing is not required for permanent structures due to the low structure height (30 feet AGL) and lack of airspace penetration. Temporary construction equipment (cranes) will be evaluated separately under 14 CFR Part 77 prior to construction, and a 7460-1 will be filed if applicable thresholds are triggered.

Electromagnetic Interference (EMI)

The facility is a commercial data center. All IT equipment, power distribution units, and the customer-dedicated 115 kV substation are designed to comply with standard commercial FCC Part 15 regulations for electromagnetic compatibility. As with all Kern County projects a condition will be applied to require coordination for frequency deconfliction.

Exterior Lighting

All exterior lighting for the facility — including parking areas, the generator yard, and perimeter security — will be designed to full-cutoff / dark-sky compliant standards in accordance with Kern County Zoning Ordinance requirements. Upward light scatter will be minimized to avoid interference with military night operations and the adjacent Inyokern Airport.

Next Steps and Contact Information

We are committed to ensuring this project remains fully compatible with the military mission for the R-2508 Military Airspace Complex. The formal CEQA environmental review process will be initiated shortly by the CEC and Kern County, at which time your office will receive the applicable public notice.

Once we have submitted the application to the CEC we are ready to coordinate any studies or conversations needed to answer your questions and will provide our technical experts for those consultations.

Sincerely,



R&L Capital
Mailing Address: PO Box 907, Trona CA, 93592

Robbie Barker
CEO, R&L Capital.

82740 Trona Rd, Trona, CA 93562

CC:
Kern County Planning & Natural Resources Department
California Energy Commission, STEP Division

USPS TRACKING #



9590 9402 8295 3094 9782 79

CA 913

6 L

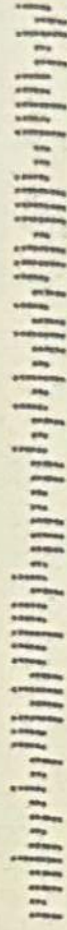
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 8295 3094 9782 79

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

R&L Capital, Inc
PO Box 907
Troy, Ca 93562



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Community Plans, Liaison
NAWS - Headquarters
1 Admin Circle
Chin Lake Ca 93555



9590 9402 8295 3094 9782 79

2. Article Number (Transfer from service label)

9589 0710 5270 0017 2676 15

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Lacey O'Grady*

☒ Agent

☐ Addressee

B. Received by (Printed Name)

LACEY O'GRADY

C. Date of Delivery

4/27/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

RB INYOKERN DATA CENTER

Application for Small Power Plant Exemption (SPPE)

Inyokern, Kern County, California

Docket Number - 26-SPPE-01

Supporting Document Appendix N

Subsection(s):

- N. 3 Cumulative Projects Analysis

CUMULATIVE IMPACTS ANALYSIS

RB Inyokern Data Center | 99 MW SPPE Application

Inyokern, Kern County, California

Applicant	R & L Capital, Inc.
APNs	084-010-43, -44, -45, -48 Parcel Map 4949
Site Address	SR-178/Brown Road corridor, Inyokern, CA 93527
Site Area / Zoning	50 acres M-2 PD (Medium Industrial, Precise Development Combining)
Facility	238,000 sq ft Single-story Max 30 ft Six modular IT suites 50 - acre campus
Capacity	Maximum operational load served not exceeding 99 MW PUE 1.41
Backup Power	40 × Cat 3516E @ 3,000 ekW 99 MW operational N+1 per yard
Emission Controls	Johnson Matthey DPF/SCR NOx 0.50 g/bhp-hr outlet (Tier 4 Final-equivalent) BACT subject to EKAPCD review
Interconnection	SCE MOS174 (March 30, 2026) 115 kV dedicated substation
Water Supply	Inyokern CSD will-serve April 2, 2026
Construction	Start 2027 Approx. 48-month development period Phased commissioning / operations tied to SCE service Project life 25–30 years
SPPE Pathway	CEC Small Power Plant Exemption 99 MW operational
Entitlements	CUP Specific Plan Amendment LLA No. 28-25 SPPE Application / CEQA review
Document	Cumulative Impacts Analysis

DISCLAIMER

This Analysis was prepared using publicly available information from the Kern County Planning & Natural Resources Department, California State Clearinghouse (CEQAnet), Caltrans District 9, Kern Council of Governments (Kern COG), Indian Wells Valley Groundwater Authority (IWVGA), and the California Energy Commission (CEC) as of April 2026, supplemented by project-specific data provided. This document does not constitute a final CEQA document, legal advice, or engineering analysis.

1. PURPOSE & REGULATORY FRAMEWORK

This analysis presents the cumulative impacts analysis for the RB Inyokern Data Center (RBIDC) — a hyperscale data center campus proposed in Inyokern, Kern County, California (APNs 084-010-43, - 44, -45, and -48). The analysis is prepared pursuant to CEQA Guidelines Section 15130 and supports both the Kern County Conditional Use Permit (CUP) proceedings and the California Energy Commission (CEC) Small Power Plant Exemption (SPPE) application, consistent with 20 CCR Division 2, Chapter 5, Appendix B. CEC STEP Division is the lead agency contact for this Application.

The emergency backup generating facility consists of 40 Caterpillar 3516E diesel generators at 3,000 ekW. Generators are arranged as two yards (east and west) with 20 units per yard, each yard configured in N+1 redundancy. The N+1 configuration provides standby redundancy within each yard; the maximum operational load served under any scenario is 99 MW. The maximum load served under any scenario is 99 MW, consistent with the 70 MW IT + 29 MW non-IT facility design and the confirmed 99 MW SCE interconnection. SPPE eligibility is based on the 99 MW maximum operational load. Generators are designed exclusively for on-site emergency backup and limited testing and will not export power to the grid.

The broader RBIDC project includes: a 238,000 sq ft single-story data center building with six modular data halls (70 MW aggregate IT load; 99 MW total facility demand); customer-dedicated 115 kV substation with two step-down transformers (115→34.5 kV, 2N redundant); two 115 kV SCE overhead subtransmissionlines (Route 1 - 8,000 LF / 34 structures; Route 2 - 4,000 LF / 14 structures) connecting to the Inyokern 115 kV Substation; ancillary rooftop and parking canopy PV; hybrid dual chilled-water cooling system; and ancillary site improvements. Lot Line Adjustment No. 28-25 must be completed prior to construction start. The customer-dedicated 115 kV substation is described in the project's electrical engineering documents and SCE MOS174 (March 30, 2026).

Cumulative impacts analysis under CEQA evaluates the combined environmental effects of the proposed project together with past, present, and reasonably foreseeable future projects in the same geographic area. A project's contribution is considered cumulatively considerable when its incremental effects are significant when viewed in combination with the effects of other projects (CEQA Guidelines 15064(h)).

The geographic study area is the Indian Wells Valley (IWV) region of eastern Kern County — defined by its hydrologic isolation as a critically overdrafted SGMA basin, single-source groundwater dependency, shared transportation corridors (SR-14, SR-178, SR-395), the Eastern Kern Air Pollution Control District (EKAPCD) airshed, and proximity to NAWS China Lake. Eleven cumulative reference projects were independently verified through the Kern County Planning & Natural Resources Department portal, California State Clearinghouse (CEQAnet), Caltrans District 9, the Kern Council of Governments (Kern COG), the Indian Wells Valley Groundwater Authority (IWVGA), and the CEC Power Plant Database.

2. PROJECT DESCRIPTION

The following table presents the complete project identification, derived directly from the signed CUP application (November 2025), Environmental Information Form, site plan (A.1), and generator specification documents.

Parameter	Project Data
Project Name	RB Inyokern Data Center
Applicant	R & L Capital, Inc. P.O. Box 907, Trona CA 93592
Agency (CEQA)	CEC / Kern County Planning & Natural Resources Department
CEC Pathway	Small Power Plant Exemption (SPPE)

Parameter	Project Data
Associated Entitlements	CUP (Conditional Use Permit), Specific Plan Amendment (eliminate 90 ft ROW reservation per Inyokern Specific Plan), Lot Line Adjustment (LLA), SPPE Application / CEQA review
Site Address / Location	(SR-178) between Browns Road and US Route 395, Inyokern, Kern County, California 93527
Assessor's Parcel Numbers	084-010-43, -44, -45, and -48
Zoning	M-2 PD — Medium Industrial, Precise Development Combining
Existing Site Designation	M2-PD
Site Area	50 acres total
Facility Size	238,000 sq ft / Single-story
Backup Power System	40 × Cat 3516E HPD @ 3,000 ekW each - configured as two generator yards (east and west), 20 generators per yard, N+1 redundancy per yard; maximum operational load under any scenario = 99 MW (consistent with confirmed SCE interconnection and 70 MW IT + 29 MW non-IT facility design); N+1 per yard provides redundant standby capacity; emergency operation at ≤80% peak rated capacity; 24–72 hrs fuel storage at full design load; 6 × 100,000-gallon fuel storage
Generator Emissions	EPA Tier 2 certified engine (ESE) with Johnson Matthey DPF/SCR (SCRT) aftertreatment system achieving Tier 4 Final equivalent: NOx reduced 92.6% to 0.50 g/bhp-hr; full catalyst outlet data on file
Generator Sound	Estimated 60–70 dBA at 7m (23 ft) with sound-attenuated enclosure + JM SCRT system (40–45 dBA insertion loss)
Diesel Fuel Storage	Two containment fields, each with 3 × 100,000-gallon tanks = 600,000 gallons on-site total
Cooling System	Hybrid cooling system with chilled-water plants, water-cooled and air-cooled cooling components, direct liquid cooling support for high-density IT loads, CRAH units, water treatment systems, and on-site water storage, subject to final engineering. Cooling design is based on PUE ~1.41 and the Inyokern CSD will-serve demand envelope, including cooling tower makeup water as the dominant demand driver.
Renewable Energy	On-site solar PV and BESS are included as part of the RBIDC campus concept, with solar PV planned on rooftops and parking canopies and BESS reserved for campus energy resiliency and demand management. Final BESS specifications, sizing, interconnection requirements, and applicable approvals will be provided as design advances.
Water Supply	Inyokern CSD Will-Serve letter issued April 2, 2026

Parameter	Project Data
	Cooling tower makeup water = 28,500 GPD (dominant demand driver). Potable/sanitary = 1,900 GPD. Irrigation = 500 GPD. Design based on PUE 1.41 ($\pm 10\%$). WSA per Water Code §10910 required. Annexation required prior to construction. BESS fluoride/lithium/PFAS pretreatment evaluation required by District.
Sewer	Connection to Inyokern CSD sewersystem
Site Access	SR-178 — primary access; SCE subtransmission line easement (200'x200' POI) east of site on APN 084-010-48
Parking	155 total spaces: EV spaces, 6 ADA (including 1 ADA Van)
Employment	Approximately 30-60 permanent operations employees per day at full operation; peak construction workforce - 592 workers (Month 20) including visitors, deliveries, and service personnel; construction workforce from regional labor pool
Surrounding Land Uses	North: Solar East: Undeveloped and US-395 South: Gas station/convenience store and SR-178 West: Brown Road
Environmental Justice	Inyokern CDP CalEnviroScreen 4.0 score = 66 (below SB 535 75th percentile disadvantaged community threshold); elevated asthma indicator (79th percentile) and cardiovascular disease (96th percentile) inform analysis; no disproportionately high and adverse effects identified with PDMs and mitigation
Wildfire Hazard	Site classified as Local Responsibility Area (LRA) under CAL FIRE FHSZ mapping; not within State Responsibility Area (SRA)
Visual Resources	6 key observation points (KOPs); no mitigation measures required; nearest eligible scenic highway SR-14 -3.2 miles west; Pacific Crest Trail -12.5 miles west
Stormwater / Floodplain	FEMA Special Flood Hazard Zone A — site elevation mitigation and Letter of Map Revision (LOMR) required; on-site stormwater retention basin - 2.2 acre-feet; SWPPP per State Construction General Permit; seismic resilience per CBC 2022; black-start capability for PSPS/wildfire resilience
Cortese List	Site is NOT included on California hazardous waste sites list (Cortese list) — verified per signed Section 65962.5 declaration, 11/7/2025
Nearest Sensitive Receptor	Inyokern Elementary School & State Preschool and Inyokern Senior Center are the nearest sensitive receptors. For conservative AQIA/HRA modeling, receptor locations were evaluated at approximately 0.23–0.24 mile from the Project boundary/property line; building-distance references differ by analytical purpose.

3. BACKUP POWER SYSTEM — GENERATOR SPECIFICATIONS & EMISSION CONTROLS

The backup power system is a defining element of this project's CEQA and CEC SPPE review. The facility deploys 40 Cat 3516E generators at 3,000 kW each arranged as 20 per yard in N+1 redundancy — providing standby redundancy within each generator yard. The applicant's SPPE eligibility position is based on the 99 MW maximum operational load (70 MW IT + 29 MW non-IT), which represents the maximum operational load served under any operating scenario. Generator specifications are drawn from Caterpillar data sheet LEHE2570-05 and Johnson Matthey CompactSCRT engineering drawings (Drawing 202-C0039989 Rev B, Quinn Power Systems EWR No. 03711, October 2025).

Parameter	Specification / Data
Generator Model	Caterpillar 3516E High Power Density (HPD) Diesel Generator Set
Rating — Standby / Mission Critical	3,000 ekW (3,750 kVA) at 60 Hz, 1,800 rpm
Rating — Prime	2,725 ekW (3,406 kVA)
Unit Count	40 × Cat 3516E @ 3,000 ekW; 20 generators per yard (east/west); maximum operational load served not exceeding 99 MW; N+1 per yard provides standby redundancy; facility load split: 70 MW IT + 29 MW non-IT.
EPA Certification	EPA Tier 2 — Emergency Stationary (ESE); U.S. EPA Certified for Emergency Stationary Applications
Aftertreatment System	Johnson Matthey CompactSCRT (DPF + SCR) — cSCRT 24/22S10x10-2+1-30/30 Quinn Power Systems EWR No. 03711
NOx — Catalyst Inlet	6.76 g/bhp-hr (Tier 2 nominal at 100% load, 1,800 rpm)
NOx — Catalyst Outlet	0.50 g/bhp-hr (92.6% reduction) — meets Tier 4 Final reference value of 0.50 g/bhp-hr
CO — Catalyst Inlet / Outlet	1.20 g/bhp-hr inlet → 0.24 g/bhp-hr outlet (80% reduction; Tier 4F reference 2.60 g/bhp-hr)
HC — Catalyst Inlet / Outlet	0.06 g/bhp-hr inlet → 0.018 g/bhp-hr outlet (70% reduction; Tier 4F reference 0.14 g/bhp-hr)
PM — Catalyst Inlet / Outlet	0.06 g/bhp-hr inlet → 0.009 g/bhp-hr outlet (85% reduction; Tier 4F reference 0.02 g/bhp-hr)
NFPA 110 Compliance	NFPA TIA 22-1 (effective May 8, 2024): EPA-mandated Tier 4 SCR inducement shutdowns prohibited for permanent Level 1 applications — project complies via Tier 2 engine + DPF/SCR aftertreatment approach
Fuel Consumption @ 100% Load	773.2 L/hr (204.3 gal/hr) per unit; Ultra-Low Sulfur Diesel. Cross-reference confirmed: this figure is consistent with §4.6 Energy (Table 4.6-6), which uses 204.3 gal/hr at 100% load from CAT 3516E Technical Data Sheet LEHE2570-05.
Diesel Fuel Storage	Two containment fields × 3 tanks × 100,000 gal = 600,000 gallons total on-site
Sound Level (with enclosure + SCRT)	Estimated 60–70 dBA at 7 m (23 ft) 40–45 dBA insertion loss from enclosure + JM SCRT system
Exhaust Temperature	903°F at full load Urea injection permissive: 575°F
Data Center Compliance	All ratings Tier III/Tier IV compliant; ANSI/TIA-942 Rated-1 through Rated-4

A critical regulatory note: NFPA 110 Tentative Interim Amendment TIA 22-1, effective May 8, 2024, prohibits EPA-mandated Tier 4 engine SCR inducement shutdowns for permanent Level 1 applications. This project's configuration — using a Tier 2 certified engine with bolt-on Johnson Matthey DPF/SCR aftertreatment achieving Tier 4 Final equivalent outlet emissions — is specifically designed to comply with this requirement, ensuring generators remain available during extended emergency events without SCR-induced engine shutdown risk. This approach has been validated in the referenced Soto Data Center application (Quinn Power Systems EWR 03711) and provides a robust precedent for EKAPCD Authority to Construct permitting.

4. SENSITIVE RECEPTOR ANALYSIS

The sensitive receptor map (Appendix B, §(g)(10)(B), prepared March 14, 2026, field-confirmed via GPS) identifies all schools, hospitals, daycare facilities, and long-term care facilities within the SPPE study radii. The project site's location at the industrial edge of the Inyokern community plan area — between undeveloped Mojave Desert scrub to the north and east and SR-178 to the south — results in a favorable receptor separation profile.

Receptor	Type	Distance from Site	Significance to CEQA Analysis
None	—	Within 0.25 mi (1,320 ft)	No occupied sensitive receptor building — Within 0.25 mi (1,320 ft) — No occupied sensitive receptor building is located within 0.25 mile; conservative AQIA/HRA modeling uses nearest property-line receptor locations.
Inyokern Elementary School & State Preschool 6601 Locust St, Inyokern	School / Daycare	~1 mile SW (Section 4.15 Table 4.15-3, school building to project site); 0.23 miles to nearest property boundary (AQIA Table 4-6, used for AERMOD/HARP2 health risk receptor modeling) — both measurements are correct for their respective purposes. The property-line distance (0.23 mi) is used for air quality health risk modeling because it is the more conservative (closer) receptor location, consistent with EKAPCD and HARP2 methodology. The building distance (~1 mile) is used for public services and noise analysis where the occupied structure is the relevant receptor.	Primary receptor for air quality, noise, and hazardous materials analysis; CDE CDS Code 15-73742-6009609

Receptor	Type	Distance from Site	Significance to CEQA Analysis
		Using the property-line distance for HRA is a conservative choice that strengthens, not weakens, the less-than-significant finding.	
Kern County Fire Station 83	Fire Station	~0.5–0.9 mi, depending on measurement method	Emergency response baseline; access route analysis for SR-178 construction overlap
Branch Health Clinic, China Lake (NAWS)	Military Medical Clinic	~9.5 mi NE	Within 10-mile SPPE review radius; TRICARE/Health.mil facility
Ridgecrest Regional Hospital	Hospital (25-bed CAH)	~15 miles SE	15 miles SE (24/7 ED); Liberty Ambulance regional ground transport; Inyokern Airport 0.4 miles west for air ambulance
Bella Sera Skilled Nursing Facility	Skilled Nursing Facility	~10.5 mi E	Within 12-mile SPPE supplemental radius; bellasera.rrh.org

The absence of occupied sensitive receptor buildings within 0.25 mile is a favorable siting factor. Inyokern Elementary School is the primary sensitive receptor for this project. Note on distances: AQIA Table 4-6 lists the school at 0.23 miles SW — this is the distance to the nearest property boundary, used as the conservative receptor location for AERMOD/HARP2 health risk modeling. Section 4.15 Table 4.15-3 lists the school at approximately 1 mile — this is the building-to-project-site distance used for public services analysis. Both measurements are correct for their respective analytical purposes. The Inyokern Senior Center is located at approximately 0.24 miles SW per AQIA. KCFD Station 83 is located 0.5 miles NW (primary fire responder). Ridgecrest Regional Hospital is 15 miles SE (24/7 ED). All health risk modeling results at the 0.23-mile receptor location remained below EKAPCD significance thresholds (cancer risk 5.63E-06 vs. 10E-06 threshold).

5. CUMULATIVE PROJECTS LIST

The 11 projects below form the basis of this cumulative analysis per CEQA Guidelines §15130(a)(1), which requires a list of past, present, and reasonably foreseeable future projects together with a summary of their expected environmental effects. Projects span energy infrastructure, water supply, transportation, and mining — all resource categories with direct overlap with the proposed data center's construction and operational footprint. Project #11 (Coso Geothermal Complex) is included as the existing baseline per §15130.

#	Project Name	Type	Status	Timeline	Cumulative Overlap with Proposed Project
1	RB Inyokern Solar Project	Utility Solar PV	Past – Certified	NOP 2017; EIR Certified	Land disturbance, biological baseline (desert tortoise habitat documented N of SR-178 adjacent to project site), visual, groundwater, EKAPCD air quality — most directly analogous local EIR
2	Inyokern 1203 Community Solar Farm	Community Solar PV	Past – Operational	Operational since 2016	SCE Inyokern Substation interconnection (same POI corridor), land use compatibility, visual

#	Project Name	Type	Status	Timeline	Cumulative Overlap with Proposed Project
3	Windhub Solar Project	Utility Solar PV	Past – Approved	NOP Nov 2015; Prior Approval	Land disturbance, biological, visual, groundwater, energy infrastructure — adds to cumulative IWV solar footprint
4	Edwards AFB Solar Project	Utility Solar PV	Past – Certified	EIR Certified	Land disturbance, biological (Mojave Desert habitat fragmentation), visual, DRECP ACECs
5	IWVGA Imported Water Pipeline	Water Supply Infrastructure	Present / Active	EIR In Progress; SCH# 2023080020; Cert. est. 2026	HIGHEST PRIORITY — Groundwater/SGMA, 50-mile linear disturbance, construction traffic on SR-395/Redwood/Neuralia, biological (BLM ACECs), cultural (prehistoric trails)
6	SR-178 Rehabilitation – Segment 1 (09-38331)	Transportation	Present / Active	CON April 2027 – \$26.6M; Caltrans D9	Direct construction access conflict: lane closures on primary east-west corridor during data center construction window; fugitive dust, NOx, traffic LOS
7	SR-178 Rehabilitation – Segment 2 (09-38330)	Transportation	Present / Active	CON July 2027 – \$34.7M; Caltrans D9	Direct construction access conflict: completes SR-178 corridor rehabilitation; combined \$61.3M program PM 88.6 to PM R93.4
8	Mojave Life of Mine Reclamation (CalPortland)	Mining/Quarry	Present / Active	NOP Aug 2024; EIR In Progress	Fugitive dust (PM10/PM2.5), diesel particulate on SR-14/SR-58 haul corridors, biological, land disturbance
9	Pappas Solar Project (Radiant BMT LLC)	Utility Solar PV	Future / Pending	NOP Mar 2026; EIR In Preparation	Most recent IWV CEQA filing; land disturbance, biological, visual, groundwater, EKAPCD
10	SR-14 Shoulder Widening (09-39140)	Transportation	Future / Pending	ENV 25%; CON est. March 2030 – \$60.8M; Kern COG	Primary north-south access corridor from Antelope Valley; ENV phase trajectory intersects data center construction window; fugitive dust, traffic
11	Coso Geothermal Complex (Units 1–3) — BASELINE	Geothermal, 430 MW Operating Since 1987	Baseline – Existing	Operating since 1987–1991; NAWSCL adjacent	BASELINE REFERENCE: Groundwater (brine reinjection, historic IWV overdraft contributor), H ₂ S/NOx air quality baseline, Inyo-Kern 230kV transmission baseline (430 MW reservation), noise baseline, cultural resource precedent (Coso Rock Art District Section 106 framework)

6. CUMULATIVE IMPACTS ANALYSIS BY RESOURCE CATEGORY

6.1 Water Supply & Groundwater [QK Water Supply Assessment, January 2026; Inyokern CSD Will-Serve, April 2, 2026]

The Water Supply Assessment (WSA) for the RB Inyokern Data Center was prepared by QK (January 2026; Project #160268.05) pursuant to Water Code Section 10910 and SB 610. The WSA examines water supply availability under normal, single-dry, and multiple-dry year conditions over a 20-year projection.

The Indian Wells Valley Groundwater Subbasin (Basin 6-54, South Lahontan Hydrologic Region) is designated as critically overdrafted under SGMA. The 2025 IWVGA Periodic Evaluation documents a current basin overdraft of 24,990 AFY under baseline conditions (no further GSP implementation). The IWVGA GSP's implementation scenario projects groundwater extraction reduced to the sustainable yield of 7,650 AFY once imported water begins in 2030, with the 2025 model confirming that currently planned projects and management actions will lead to sustainable management. Baseline extractions are projected at 22,465 AFY (WY 2030) to 26,206 AFY (WY 2070) without implementation; with full GSP implementation, extractions reduce to 7,650 AFY sustained.

Project Water Demand — Confirmed WSA Values:

- Cooling (direct liquid + air cooling): 30.68–33.75 AFY (approximately 10–11 MGY) — dominant demand category
- Domestic office / sanitary use: 3.06–6.13 AFY (approximately 1–2 MGY)
- Closed-loop makeup, sprinkler testing/refill, humidification: 3.06–9.20 AFY (approximately 1–3 MGY)
- Irrigation: minimum 20% below MAWA (Maximum Allowed Water Allowance)
- Total annual operational demand: 36.83–49.10 AFY (approximately 12–16 MGY)
- Maximum project demand per WSA (49.10 AFY) = 0.185% of projected available yearly supply of 26,511 AFY — less than one-fifth of one percent of basin supply. Note on governing demand figure: The WSA's 49.10 AFY represents the modeled upper-bound scenario (Maximum Day Demand annualized at PUE 1.41 plus conservative margins). The Inyokern CSD April 2, 2026 executed Will-Serve letter is the more recent and controlling service document, establishing the design envelope at ADD 40,430 GPD ($\approx$ 45.3 AFY). The CSD's ADD is the figure that governs service planning and will-serve capacity; the WSA's 49.10 AFY upper bound remains valid as a conservative CEQA analysis ceiling. Both figures confirm the project's demand is minor relative to basin supply.
- Construction water: 9–11 million gallons total (peak 25,000 GPD during earthwork; average 7,000–8,000 GPD)

The WSA concludes that the physical availability of groundwater at and near the project site is sufficient for both construction and operation. The Inyokern CSD's water source within the IWVGA is expected to provide adequate, reliable water supply for the CSD's service area. The CSD's April 2, 2026 executed will-serve letter is the governing service document, establishing the design envelope at ADD 40,430 GPD ($\approx$ 45.3 AFY) / MDD 60,645 GPD / PHD 101,075 GPD with cooling tower makeup water of 28,500 GPD as the dominant daily driver. The WSA's 49.10 AFY upper-bound figure represents a conservative modeled maximum; the CSD ADD of 40,430 GPD governs actual service planning. Both figures confirm the project's water demand is less than one-fifth of one percent of projected basin supply.

Cumulative Water Demand Context:

- Project #11 — Coso Geothermal (Baseline): Major historical IWV groundwater user contributing to the 24,990 AFY overdraft baseline documented in the WSA.
- Project #5 — IWVGA Imported Water Pipeline: The GSP's primary structural remedy for overdraft — WSA documents that imported water is expected to initiate in 2030, which is the critical inflection point for basin sustainability.
- Projects #1, #3, #9 — Solar PV Projects: Construction-phase water adds to cumulative demand during the 48-month data center construction window (2027–2031).

The WSA's key finding that the project represents 0.185% of projected available basin supply contextualizes the project's individual contribution as minor relative to total basin use. The cumulative analysis, however, must evaluate the project's demand in combination with all committed and projected withdrawals against the GSP allocation framework — particularly in relation to the 2030 imported water initiation milestone that the IWVGA's sustainability projections depend upon.

The IWVGB is in a basin-wide overdraft condition that predates the Project. The Project's maximum annual water demand is estimated at 49.10 AFY, or approximately 0.185% of projected available yearly supply. With implementation of MM 4.10-2 and MM 4.10-3, including compliance with applicable IWVGA Groundwater Sustainability Plan requirements, the Project's incremental contribution to cumulative groundwater impacts would be less than significant and not cumulatively considerable.

6.2 Air Quality & Greenhouse Gas Emissions [QK AQIA, February 2026; AERMOD/CalEEMod/HARP2]

QK completed the Air Quality Impact Analysis (AQIA) for the RB Inyokern Data Center in February 2026 (Project #160268.05), prepared pursuant to EKAPCD CEQA Guidelines (1999), CEC Appendix B §(g)(8)(A-K), and CARB HARP2 health risk methodology. The analysis evaluates 40 Caterpillar diesel generators equipped with SCR, DEF, and DPF systems achieving Tier 4 Final-equivalent outlet emissions. The proposed emissions-control strategy is presented as BACT for EKAPCD Rule 210.1 review. Generators are limited to 50 hours/year for maintenance/testing (Title 17, §93115 CCR) and qualify for offset exemption under

Rule 210.1 (emergency equipment <200 hrs/year). AERMOD dispersion modeling used Edwards AFB meteorological data (2012, 2016, 2017, 2019, 2020); 578 discrete off-site receptors analyzed.

Construction Emissions — Less Than Significant (CalEEMod, Table 4-3):

- Peak year 2027: ROG 0.29, NOx 1.72, CO 4.75, PM10 0.54, PM2.5 0.16 tons/year — well below all EKAPCD thresholds (NOx/ROG 25 t/yr; PM10/PM2.5 15 t/yr)
- Concurrent SR-178 rehabilitation (Projects #6, #7) and SR-14 Shoulder Widening (Project #10) create the primary construction-phase cumulative PM10/PM2.5 overlap on shared access corridors — addressed through coordinated dust control planning as identified in the main application

Operational Emissions — Less Than Significant (Table 4-4 Emergency Operations Scenario):

- Total: ROG 6.89, NOx 18.6, CO 95.77, SOx 0.19, PM10 1.65, PM2.5 0.82 tons/year — NO EKAPCD threshold exceeded
- Generator contribution: ROG 4.97, NOx 17.74, CO 92.24, SOx 0.18, PM10 0.53, PM2.5 0.53 t/yr
- Cooling tower drift contribution: PM10 0.58, PM2.5 0.12 t/yr (AP-42 Section 13.4 methodology)

Health Risk Assessment — Less Than Significant (HARP2/AERMOD, Table 4-7):

- Cancer risk (construction + operational combined): 5.63E-06 — below EKAPCD threshold of 10.0E-06 (10 in one million)
- Chronic non-cancer hazard index: 2.10E-03 — well below threshold of 1.0
- Acute non-cancer hazard index: 6.38E-02 — well below threshold of 10.0
- Nearest sensitive receptors: Inyokern Elementary School (0.23 mi SW) and Inyokern Senior Center (0.24 mi SW) — both below all health risk thresholds

Greenhouse Gas Emissions — Less Than Significant (CalEEMod, Table 4-14):

- Total on-site project emissions: 2,379 MT CO2e/year (annualized construction 174.6 + on-site operational 2,205)
- Emergency generators: 1,317 MT CO2e/year; miscellaneous operations: 637.6; refrigerant leakage: 250.8
- EKAPCD GHG threshold: 25,000 MT/year — project at 9.5% of threshold — less than significant
- Off-site energy (SCE grid): 210,262 MT CO2e/year — reported by SCE, not in project inventory; on-site solar PV and BESS provide direct demand-offset and resiliency benefits within the Project footprint.

Ambient Air Quality — Less Than Significant (AERMOD Refined Analysis, Tables 4-10/4-11):

- NO2 1-hour refined: project contribution 53.5 µg/m³, total 137.8 µg/m³ — below NAAQS 188.68 µg/m³
- PM10 24-hour: project contribution 5.95 µg/m³ — below SIL of 10.4 µg/m³
- PM2.5 24-hour: project contribution 1.94 µg/m³ — below SIL of 2.5 µg/m³

Cumulative Air Quality — Not Cumulatively Considerable (Section 5, Tables 5-1/5-4):

- Project NOx = 0.268% of Kern County 2026 inventory; ROG = 0.204%; PM10 = 0.032% — inconsequential contribution to regional O3 and PM10 formation
- EKAPCD applies a single threshold for both project-specific and cumulative impacts; because project emissions are less than significant individually, the project's incremental contribution is not cumulatively considerable per CEQA Guidelines §15064(h)(3)
- H2S monitoring at Trona-Athol station shows 131 exceedance days in 2024 — reflecting Coso Geothermal's contribution to the existing EKAPCD air quality baseline (Project #11); project's SCR/DPF aftertreatment does not contribute to H2S baseline

6.3 Traffic & Circulation

The IWW highway network is limited and non-redundant. SR-14 is the primary north-south corridor; SR-178 is the primary east-west corridor; SR-395 is the local Inyokern spine. All three routes are subject to active or pending construction during the 48-month data center construction period beginning 2027.

- Projects #6 & #7 — SR-178 Rehabilitation: Both segments are active through 2027, directly affecting the project's primary construction access via SR-178. Lane closures and flagging operations will conflict with heavy equipment and material delivery traffic.

- Project #5 — IWVGA Pipeline: Pipeline crossings at SR-395, Redwood Boulevard, and Neuralia Road — key local Inyokern access routes — require road cuts, shoring, and lane disruptions coincident with the data center construction window.
- Project #10 — SR-14 Shoulder Widening: CON phase estimated March 2030 may overlap with later phases of the 48-month schedule. SR-14 is the primary materials and labor delivery corridor from the Antelope Valley.
- Project #8 — CalPortland Mine Reclamation: Haul trucks on SR-14 and SR-58 contribute to the existing heavy vehicle baseline on primary access corridors.

The cumulative traffic analysis considers potential schedule overlap among highway-affecting projects and RBIDC construction traffic, including temporary lane closures, flagging, heavy vehicle deliveries, and access constraints on SR-178, SR-14, and US-395. Potential cumulative construction-period effects would be addressed through construction traffic management, agency coordination, and applicable Caltrans and Kern County encroachment / traffic-control requirements. Data center construction trip generation — dominated by heavy trucks for structural steel, precast concrete, mechanical/electrical equipment, and 600,000 gallons of diesel fuel — peaks during a window directly concurrent with SR-178 rehabilitation.

6.4 Biological Resources [QK Biological Analysis Report, December 2025]

QK biologists conducted reconnaissance surveys on August 26, 2025, and November 6, 2025 (subtransmission line and POI area). Protocol-level floristic surveys were conducted on April 8 and May 10, 2024 (data center parcel). Desert tortoise and Mohave ground squirrel protocol surveys were conducted by authorized QK biologists. The BSA encompasses the 50-acre data center site plus the subtransmission line corridor and POI area on APN 084-010-48.

Database reviews identified 13 special-status plant species and 16 special-status wildlife species with potential to occur on or near the site. Based on on-site surveys, soil type, elevation, historical range, and habitat conditions, the following species were determined to have potential to occur on-site:

- Special-Status Plants (3 species with potential): Barstow woolly sunflower (*Eriophyllum mohavense*), Charlotte's phacelia (*Phacelia nashiana*), and Latimer's woodland-gilia (*Saltugilia latimeri*)
- Special-Status Wildlife (11 species with potential): Desert tortoise (*Gopherus agassizii* — federally and state threatened), Mohave ground squirrel (*Xerospermophilus mohavensis* — state threatened), western burrowing owl (*Athene cunicularia* ssp. *hypugaea*), Crotch's bumble bee (*Bombus crotchii*), golden eagle (*Aquila chrysaetos*), Swainson's hawk (*Buteo swainsoni*), prairie falcon (*Falco mexicanus*), loggerhead shrike (*Lanius ludovicianus*), LeConte's thrasher (*Toxostoma lecontei*), American badger (*Taxidea taxus*), and desert kit fox (*Vulpes macrotis arsipus*)

Vegetation: Two habitat types present — Desert Scrub (approximately two-thirds of BSA) and Alkali Desert Scrub. No water features in the BSA will be crossed or impacted by the subtransmission line route. The BSA is almost entirely in FEMA 1% Annual Chance Flood Hazard zone. Topography is generally flat, sloping gently from south to north, elevation 2,416–2,435 ft AMSL.

The BAR concludes: with implementation of avoidance and minimization measures, direct and indirect impacts to biological resources would be reduced to less-than-significant levels. The project is not expected to substantially impact wildlife movement corridors or jurisdictional aquatic resources.

- Projects #1, #3, #4, #9 — Solar PV Projects: Collectively represent thousands of acres of IWV alluvial fan disturbance requiring desert tortoise, Mohave ground squirrel, and burrowing owl surveys and Section 2081/USFWS Biological Opinion mitigation.
- Project #5 — IWVGA Pipeline: 50-mile corridor traverses documented BLM ACECs including El Paso to Golden Valley, Western Rand Mountains, and Fremont-Kramer — documented desert tortoise habitat.
- Project #10 — SR-14 Shoulder Widening: Transects documented desert tortoise and Mohave ground squirrel movement corridors south of Indian Wells.

The Mohave ground squirrel core population area lies southwest of Inyokern — proximity of the 50-acre project site to this core area is a key variable in the cumulative significance determination. The DRECP Conservation Measures and applicable BLM ACECs provide the regional framework for assessing cumulative habitat loss and take. The BAR finding of less-than-significant with mitigation provides the biological baseline for the CEQA significance determination.

6.5 Energy Infrastructure & Electrical Grid [SCE MOS174, March 30, 2026]

Southern California Edison completed the Method of Service Study (MOS174) on March 30, 2026, following R&L Capital's January 2025 study request. The study confirms the project will connect to the Kramer 115 kV

Subtransmission System via a new 115 kV customer-dedicated substation at the SR-178/Brown Road corridor site, Inyokern. The customer owns and operates their own transformer and feeders. Two 115 kV redundant lines provide the requested line redundancy.

SCE MOS174 confirms the Kramer 115 kV subtransmission system can accommodate the 99 MW customer load interconnection from initial energization without adverse reliability impacts. The MOS174 page 6 load table reflects the customer's original assumptions used for system analysis, not the final interconnection design.

Critical SCE finding: Permanent 115 kV subtransmission service requires 3–5 years after study completion — making the originally requested March 30, 2027 in-service date infeasible. SCE's project execution team will make commercially reasonable efforts to expedite, but the MOS includes a temporary power bridge plan to cover the gap between the requested date and permanent service completion. The study evaluated 4 planning horizons: 2027 Summer Peak, 2027 Spring Off Peak, 2030 Summer Peak, and 2030 Summer Off Peak, per NERC FAC-001-4, FAC-002-4, TPL-001-5.1, WECC TPL-001-WECC-CRT-4, and CAISO Planning Standards.

Note: The MOS study does not evaluate the effects of customer generation. On-site solar PV and BESS are included as part of the RBIDC campus concept; final BESS specifications, sizing, interconnection requirements, and applicable approvals will be provided as design advances. SCE's environmental review for new 115 kV facilities will be analyzed as part of the larger customer project CEQA documentation.

- Project #11 — Coso Geothermal (430 MW): Dominant existing load/generation on the Kramer 115 kV system — confirmed by MOS as the system being studied. The MOS load flow analysis at 2027 Summer Peak and 2030 Summer Peak directly evaluates Coso's baseline alongside the new data center load.
- Projects #1, #2, #3, #9 — Solar PV Projects: Multiple SCE interconnection queue positions on the same Kramer 115 kV system may affect available capacity timelines for onsite generation and related interconnection processes.
- NAWSCL (Naval Air Weapons Station China Lake): Priority grid load reservation on the Kramer 115 kV system — accounted for in MOS load flow analysis.

6.6 Noise [WJV Acoustics Report No. 25-45, March 17, 2026]

WJV Acoustics, Inc. conducted field noise measurements on January 14–15, 2026 per CEC requirements. Two long-term (25-hour) monitoring sites and five short-term (15-minute) sites were established. The existing ambient noise environment is dominated by traffic on Brown Road and SR-178, with contributions from commercial/industrial land uses, Inyokern Airport overflights, and NAWSCL operations.

Measured ambient conditions:

- Site LT-1 (Brown Road, ~275 ft west of project boundary): Hourly Leq ranged 51.1–66.7 dBA. 24-hour Ldn = 66.5 dB Ldn. This site is near the closest residential sensitive receptors to the west.
- Site LT-2 (SR-178, ~125 ft south of project boundary): Hourly Leq ranged 47.2–58.4 dBA. 24-hour Ldn = 60.2 dB Ldn. This site reflects the commercial/highway noise environment along the primary access corridor.
- Short-term sites ST-1 through ST-5: Leq values ranged 60.4–66.7 dBA across morning and afternoon measurement periods, consistent with SR-178 and SR-395 traffic dominance.

Kern County General Plan Noise Element standards: 65 dB Ldn exterior / 45 dB Ldn interior for residential and other noise-sensitive uses. The existing Ldn at LT-1 (66.5 dB) already exceeds the 65 dB Ldn residential standard, indicating the area is in a noise-impacted baseline condition driven by existing traffic. The operational noise analysis for the data center (cooling towers, HVAC, generator testing) must demonstrate the project's incremental contribution does not substantially increase the already-elevated baseline.

Construction noise by phase (WJVA analysis, measured from center of project area):

- Phase 1 — Site prep/earthwork/grading: 64 dBA Leq at 500 ft; 61 dBA at 750 ft; 58 dBA at 1,000 ft
- Phase 2 — Structural/utilities/paving: 61 dBA Leq at 500 ft; 57 dBA at 750 ft; 55 dBA at 1,000 ft
- Phase 3 — Mechanical/electrical/commissioning: 60 dBA Leq at 500 ft; 56 dBA at 750 ft; 54 dBA at 1,000 ft

Inyokern Elementary School is located approximately 1 mile SW (building distance per Section 4.15 Table 4.15-3) — well beyond the 1,000 ft reference distance for all construction phases, meaning construction noise at the school would be substantially attenuated. The FTA daytime construction threshold of 80 dBA Leq at residential uses is not

expected to be approached at residential receptors given project distance. The cumulative noise concern centers on concurrent SR-178 rehabilitation (Projects #6 and #7) generating construction noise on the same access corridor during the data center construction window.

6.7 Public Services [Section 4.15, Rev 2, March 30, 2026]

Public services analysis for the RBIDC is documented in SPPE Application Section 4.15 (Rev 2, March 30, 2026), consistent with CEC Appendix B, Section (g)(7). The Project site is within Battalion 7 of the Kern County Fire Department (KCFD).

Fire Protection:

- KCFD Station No. 83 (Primary): 6919 Monache Mountain Ave., Inyokern — approximately 0.5–0.9 miles from the project site depending on measurement method; ALS-equipped; Knox Box rapid entry at secured main gate on SR-178 for immediate emergency access; expected response time single-digit minutes under normal conditions
- KCFD Station No. 84 (Mutual Aid): 139 E. Las Flores Ave., Ridgecrest — approximately 15 miles SE
- KCFD Station No. 81 (Mutual Aid): 815 W. Dolphin Ave., Ridgecrest — approximately 17 miles SE
- Project fire suppression systems: VESDA aspirating smoke detection; Novec/FM-200 clean-agent suppression in white-space and UPS rooms; pre-action sprinklers in mechanical/electrical rooms; wet-pipe sprinklers in office areas per NFPA 13; on-site fire pumps (duty + standby); fire water storage tanks (2 × 52,000-gal); on-site hydrants per NFPA 20. Note: the 720,000-gallon fire flow demand (3,000 GPM × 4 hours per the executed Will-Serve Letter) is met through a combination of dedicated on-site fire water storage, the CSD water system connection, and fire pump design per final fire protection engineering and Kern County Fire Marshal approval.

Emergency Medical Services:

- Ridgecrest Regional Hospital: 1081 N. China Lake Blvd., Ridgecrest — approximately 15 miles SE; 24/7 emergency department; Liberty Ambulance regional ground transport
- Inyokern Airport: approximately 0.4 miles west — available as air ambulance resource

Law Enforcement:

- KCSO Ridgecrest Substation (Primary): 128 E. Coso Ave., Ridgecrest — approximately 15 miles SE; serves Ridgecrest, China Lake Acres, Inyokern, and surrounding areas
- San Bernardino County Sheriff — Trona Substation: approximately 18.7 miles NE (mutual aid)
- CHP Inland Division — nearest office: Mojave, approximately 45.5 miles SW

Schools:

- Sierra Sands Unified School District (SSUSD): 11 schools serving Inyokern/Ridgecrest area; total enrollment 4,205 students (SY 2024–25); 21.4 pupils/teacher ratio
- Inyokern Elementary School (K–8): approximately 1 mile SW of project site (building distance per Section 4.15 Table 4.15-3); 0.23 miles to nearest property boundary per AQIA Table 4-6 health risk receptor modeling — all health risk thresholds met at this closer distance; adjacent to Inyokern County Park
- Burroughs High School (9–12): approximately 15 miles SE in Ridgecrest
- School impact fees: applicable per Government Code §65995 and Education Code §17620; to be assessed at building permit issuance

The proximity of KCFD Station 83 is one of the most favorable public services findings in this document. A nearby primary ALS-equipped fire station serving the Project area represents an appropriate emergency-response service level for a facility with on-site fuel storage and emergency generators. The cumulative scenario most relevant to public services is concurrent construction traffic from Projects #6 and #7 (SR-178 rehabilitation) and the data center creating competing demands on emergency vehicle access to SR-178 — addressed through the construction traffic management plan.

6.8 Land Use Compatibility

The project site is zoned M-2 PD (Medium Industrial, Precise Development Combining). The CUP application confirms the site is presently undeveloped. A Specific Plan Amendment is required to eliminate the future 90-foot ROW secondary collector created by the Inyokern Specific Plan — the applicant documents that this road will never

be constructed given existing development to the north and Navy-owned property.

The cumulative pattern of energy and industrial development in the IWW — successive solar projects, geothermal operations at Coso, and military-industrial uses at NAWSCL — provides the land use baseline. The data center introduces a new large-format industrial technology use. Security lighting from a 24/7 operational facility is a land

use compatibility concern specific to data centers not typically addressed in solar project EIRs; the dark sky rural IWV context requires specific lighting analysis. The Inyokern Airport (IYK) immediately northwest of the project site presents an additional land use consideration for vertical structure height and lighting spillover.

6.9 Cultural Resources & Tribal Cultural Resources

The Coso Rock Art District — approximately 15 miles northeast of Inyokern within the NAWSCL boundary — contains an estimated 100,000+ petroglyphs and is one of the most significant rock art concentrations in North America. The IWV is traditional territory of the Timbisha Shoshone (Coso Shoshone) and Kawaiisu (Nuwu) peoples. Coso Geothermal Complex (Project #11) established the foundational Section 106/NHPA cultural resource protection framework for the IWV beginning in 1987.

- Project #5 — IWVGA Pipeline: 50-mile linear disturbance crosses documented prehistoric trail systems, lithic scatters, and habitation sites across the El Paso Mountains.
- Projects #1, #3, #4, #9 — Solar PV Projects: Prior surveys have built a substantial baseline archaeological data record; cumulative ground disturbance has reduced the inventory of undisturbed subsurface deposits.

NAHC Sacred Lands File requests were submitted December 22, 2025 and January 23, 2026; the NAHC responded March 16, 2026 with negative results for Tribal Cultural Resources and sacred sites. AB 52 tribal outreach letters were transmitted March 18, 2026 to the four tribes identified by the NAHC: Kern Valley Indian Community, Tejon Indian Tribe, Tubatulabals of Kern Valley, and Tule River Indian Tribe; no tribal responses have been received as of April 2026. A Phase I Cultural Resources Survey has been completed for the Project. Inadvertent discovery procedures are addressed in the Application mitigation framework. If a federal nexus is present, Section 106 / SHPO consultation would apply concurrently.

Hazardous Materials [BSK Phase I ESA G25001225]

Hazardous materials are addressed as a cumulative context item because the project includes 600,000 gallons of on-site diesel fuel storage, lithium-ion BESS components, and wastewater/water-quality considerations associated with cooling tower blowdown and BESS-related constituents. The BSK Phase I ESA (G25001225) identified six recognized environmental conditions (three on-site and three vicinity RECs), which will be evaluated in the main application hazards section and incorporated into final site design, construction controls, and agency conditions as applicable. Cumulative overlap is primarily with Project #8 (CalPortland Mine Reclamation) for hazardous materials handling and haul-route considerations and with the project's own generator yards, fuel containment fields, and BESS systems. The Inyokern CSD will-serve conditions require a Wastewater Characterization Report and BESS fluoride/lithium/PFAS assessment. With compliance with applicable hazardous materials business plan, spill prevention/containment, fire code, and wastewater characterization requirements, the project's hazardous materials contribution is not expected to be cumulatively considerable.

7. CUMULATIVE IMPACTS MATRIX

The matrix below synthesizes the resource-by-resource analysis from Section 6. Impact intensity reflects the relative cumulative overlap between each reference project and the proposed data center. The bottom row shows the proposed data center's combined cumulative exposure level across all resource categories.

● High ● Medium ○ Low — None/N/A Impact Intensity — Relative cumulative overlap with proposed data center by resource category											
#	Project Name	Water	Air	Traffic	Bio	Energy	Cultural	Land Use	Noise	Status	Significance Finding
1	RB Inyokern Solar	●	●	○	●	●	●	●	●	Past	Biological: Less than significant with mitigation (certified EIR). Establishes local biological and land use baseline.

2	Inyokern 1203 Solar	—	○	○	◐	●	—	○	—	Past	Energy: Past SCE Inyokern Substation interconnection — establishes grid baseline for Kramer 115 kV system.
3	Windhub Solar	◐	◐	○	●	◐	○	◐	◐	Past	Biological/Water : Cumulative desert habitat disturbance; minor IWV construction-

#	Project Name	Water	Air	Traffic	Bio	Energy	Cultural	Land Use	Noise	Status	Significance Finding
											phase water demand.
4	Edwards AFB Solar	○	◐	○	●	◐	◐	○	○	Past	Air/Bio: Cumulative construction-phase diesel equipment emissions and desert habitat disturbance.
11	Coso Geothermal ★Baseline	●	●	—	◐	●	●	◐	◐	Baseline	Baseline reference: Dominant IWV industrial baseline for air (H2S/NOx), groundwater (overdraft contributor), grid (Kramer 115 kV), and cultural (Section 106 Coso Rock Art District).
5	IWVGA Water Pipeline	●	◐	◐	●	◐	●	◐	◐	Present	Water: Highest priority — resolves IWV overdraft; EIR SCH# 2023080020; 2030 imported water initiation is the GSP sustainability inflection point. Cultural: 50-mile corridor through BLM ACECs.
6	SR-178 Rehab Seg 1	—	●	●	—	—	—	○	●	Present	Air/Traffic/Noise : Concurrent construction (CON April 2027) on primary project access corridor — direct cumulative overlap with data center Phase 1 construction window.
7	SR-178 Rehab Seg 2	—	●	●	—	—	—	○	●	Present	Air/Traffic/Noise : Concurrent construction (CON July 2027) on

#	Project Name	Water	Air	Traffic	Bio	Energy	Cultural	Land Use	Noise	Status	Significance Finding
											primary project access corridor — direct cumulative overlap with data center Phase 1 construction window.
8	CalPortland Mine Recl.	○	●	●	●	—	●	●	●	Present	Air/Traffic: Haul truck contribution to heavy vehicle baseline on SR-14/SR-58 access corridors.
9	Pappas Solar	●	●	○	●	●	●	●	●	Future	Biological: Most recent IWW CEQA filing (NOP March 2026); cumulative desert tortoise/Mohave ground squirrel habitat disturbance.
10	SR-14 Shoulder Widen	—	●	●	—	—	—	○	●	Future	Traffic: CON est. March 2030 — may overlap with Phase 2/3 of data center construction schedule (2029–2031). SR-14 is primary materials delivery corridor from Antelope Valley.

★	RBIDC DC									Propose d	Water: Less than cumulatively considerable (0.185% of basin supply; WSA complete; CSD will-serve April 2, 2026). Air: Not cumulatively considerable (NOx 18.6 t/yr = 0.268% of Kern County). Biological: Less than cumulatively considerable with mitigation per the application. Noise: Less than significant with mitigation per the application. Energy: Less than cumulatively considerable (MOS174 confirms capacity). Traffic: Less than significant with coordination. Cultural resources: Pending tribal consultation.
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#	Project Name	Water	Air	Traffic	Bio	Energy	Cultural	Land Use	Noise	Status	Significance Finding

8. MITIGATION MEASURES FRAMEWORK

Project mitigation measures applicable to the cumulative impacts identified in this document are provided in the main SPPE Application, Section 4 (Environmental Information), organized by resource category consistent with CEC Appendix B and CEQA Guidelines §15126.4. Each cumulative impact discussed in Section 6 of this document is addressed by the corresponding measure or measures in the main application.

9. COMPARABLE PROJECT ANALYSIS: CA3 DATA CENTER (CEC DOCKET 21-SPPE-01)

The CA3 Data Center (Vantage Data Services, LLC — CEC Docket 21-SPPE-01, Draft EIR January 2022) is the most directly analogous completed CEQA document in California to the proposed RB Inyokern Data Center. Both projects trigger CEC SPPE jurisdiction, involve backup diesel generator capacity at or near the 50 MW threshold, require new utility substation interconnection as a connected action, and demand multi-scenario air quality analysis of diesel generator emissions. The comparison below — informed by actual RB Inyokern project specifications — identifies where the two projects align and where they sharply diverge.

9.1 Project Identification — Side-by-Side

Category	CA3 Data Center (Santa Clara)	Proposed RB Inyokern Data Center
Applicant	Vantage Data Services, LLC	R & L Capital, Inc. / VW Construction Services
Location	2590 Walsh Avenue, Santa Clara County (urban)	SR-178 / 395, Inyokern, Kern County
Lead Agency	California Energy Commission (CEC)	CEC for SPPE component; Kern County for local land-use entitlements
CEQA Document	Draft EIR – SCH# 2021080438 (Jan. 2022)	SPPE Application – (2026)
Facility Size	468,000 sq ft, four-story, 6.69 acres	238,000 sq ft, single-story, 50 acres
IT Load / Power	96 MW maximum; 100 MVA on-site substation (Silicon Valley Power)	99 MW operational; 115 kV dedicated substation (APN 084-010-48); 2 × step-down transformers (115→34.5 kV, ±10% LTC, 2N redundant); Route 1 ~8,000 LF (34 structures); Route 2 ~4,000 LF (14 structures); 954 kcmil SAC overhead conductor; 2 fiber optic paths (3,200 LF + 8,250 LF)
Backup Generators	44 × 2.75 MW Tier 4 Final = 96 MW	40 × Cat 3516E @ 3,000 ekW = 99 MW max operational load; 20 per yard (east/west), N+1 per yard; redundant N+1 per yard configuration; SPPE eligibility based on maximum operational load served not exceeding 99 MW

Category	CA3 Data Center (Santa Clara)	Proposed RB Inyokern Data Center
Emission Controls	Tier 4 Final engines (direct engine standard)	Tier 2 engine + Johnson Matthey SCRT (DPF/SCR): NOx 0.50 g/bhp-hr outlet = Tier 4F equivalent; superior PM performance (0.009 g/bhp-hr vs 0.02 g/bhp-hr Tier 4F ref)
Renewable Energy	Off-site PPAs / RECs for GHG compliance	On-site solar PV and BESS included as part of the campus concept; solar PV planned on rooftops and parking canopies; final BESS specifications and applicable approvals to be provided as design advances.
Water Supply	Santa Clara Valley WD — no overdraft	IWV critically overdrafted SGMA basin; Inyokern CSD executed Will-Serve Letter issued April 2, 2026; ADD 40,430 GPD / MDD 60,645 GPD / PHD 101,075 GPD; WSA per Water Code §10910 mandatory; CSD annexation required
Cooling System	Urban municipal supply — no SGMA constraint	Hybrid cooling system with chilled-water, water-cooled and air-cooled components, direct liquid cooling support for high-density IT loads, and on-site water storage, subject to final engineering. PUE ~1.41; cooling tower makeup = 28,500 GPD per CSD will-serve demand envelope.
Air District	Bay Area AQMD (BAAQMD)	Eastern Kern APCD (EKAPCD); PM10 non-attainment area
Nearest Receptor	Urbanized — no isolation radius concern	Inyokern Elementary School ~1 mile SW by building distance; conservative AQIA/HRA modeling used nearest property-line receptor at 0.23 mile.
Biological	Urbanized light industrial — no sensitive species	Mojave Desert: desert tortoise, Mohave ground squirrel, burrowing owl; RB Inyokern Solar EIR documents tortoise habitat adjacent to site
Cultural Resources	Urban infill — no tribal context	Coso Rock Art District ~15 mi NE; AB 52 consultation initiated with Kern Valley Indian Community, Tejon Indian Tribe, Tubatulabals of Kern Valley, and Tule River Indian Tribe; Section 106 / SHPO consultation would apply if a federal nexus is present.
Traffic	SR-101/SR-82 Silicon Valley urban network	SR-14/SR-178/SR-395 rural desert; 3 concurrent Caltrans projects active or pending during construction window
Permanent Jobs	32 operational employees	30 - 60 employees/day

9.2 Resource Area Applicability

Resource Category	CA3 Applicable?	Notes
CEC SPPE Jurisdiction & Process	☒ Direct	Both projects exceed the 50 MW Warren-Alquist threshold. Vantage: 96 MW gross / operational. RB Inyokern: maximum operational load served not exceeding 99 MW, with N+1 redundancy per generator yard and N+2 redundancy campus-wide. SPPE eligibility argument is based on the 99 MW maximum operational load served.
Diesel Generator Air Permitting (EKAPCD)	☒ Direct	Multi-scenario run-hour analysis methodology (routine testing vs. emergency operations), Authority to Construct/Permit to Operate precedent, and BAAQMD comments re: generator overuse during grid instability all directly applicable — adapted to EKAPCD thresholds and IWW PM10 non-attainment context.
Emission Controls Approach	☒ Enhanced	CA3 used Tier 4 Final engines. RB Inyokern uses Tier 2 engine + Johnson Matthey DPF/SCR achieving identical or better outlet emissions. NFPA TIA 22-1 (May 2024) prohibits Tier 4 SCR engine shutdowns in Level 1 applications — the DPF/SCR aftertreatment approach is the regulatory-compliant path.
GHG / Carbon Neutrality (2022 Scoping Plan)	☒ Superior	Both projects must demonstrate 2022 Scoping Plan consistency. RB Inyokern's on-site solar PV and BESS provide direct demand-offset and resiliency benefits within the Project footprint, supporting a stronger showing than reliance solely on off-site RECs/PPAs.
Energy / Grid / Substation as Connected Action	☒ Direct	New substation as connected action analyzed in same CEQA document — directly applicable. RB Inyokern's POI to SCE Inyokern Substation via subtransmission line easement mirrors CA3's Silicon Valley Power substation structure.
Sound Attenuation Methodology	☒ Partial	HVAC/cooling tower operational noise methodology transferable. RB Inyokern's rural desert baseline (quiet) means significance thresholds differ — Inyokern Elementary School at ~1 mile SW (building distance) is the primary receptor; all construction noise phases attenuated to well below FTA thresholds at that distance.
Water Supply / Groundwater	☒ Not Applicable	CA3 served by Santa Clara Valley WD — no SGMA designation, no overdraft, no WSA trigger. RB Inyokern: WSA completed January 2026 (QK) — total demand 36.83–49.10 AFY (12–16 MGY), representing 0.185%; WSA concludes physical availability confirmed. Inyokern CSD will-serve confirmed April 2, 2026.
Biological Resources	☒ Not Applicable	CA3 is urban infill. RB Inyokern site is active Mojave Desert scrub. Protocol surveys required for desert tortoise, Mohave ground squirrel, burrowing owl, special-status plants. RB Inyokern Solar EIR (Project #1) — not CA3 — provides applicable local baseline.
Cultural Resources / Tribal Consultation	☒ Not Applicable	CA3 has no tribal context. Coso Rock Art District (~15 mi NE) defines the IWW cultural landscape. AB 52 consultation initiated March 18, 2026 with the four tribes identified by the NAHC. Phase I survey completed; Section 106 / SHPO consultation would apply if a federal nexus is present.
Traffic / Transportation Analysis	☒ Not Applicable	CA3 is SR-101/SR-82 urban corridor. RB Inyokern involves SR-14/SR-178/SR-395 rural desert network with 3 concurrent Caltrans projects active during construction window. Independent TIA required covering SR-14/Inyokern Road intersection and SR-178 access point.
Land Use Compatibility / Dark Skies	☒ Not Applicable	CA3 is urban industrial. Inyokern community plan context includes dark sky rural character, proximity to Inyokern Airport, and

Resource Category	CA3 Applicable?	Notes
		Inyokern/South Inyokern Specific Plans. Security lighting analysis unique to this project has no CA3 equivalent.

The most critical divergence is water supply. CA3 is served by Santa Clara Valley Water District with no SGMA designation — the CA3 water analysis has no applicability to Inyokern. The IWV critically overdrafted SGMA basin, combined with the proposed hybrid evaporative cooling tower system, makes the Water Supply Assessment the single highest-priority entitlement requirement with no CA3 precedent to draw from.

Conversely, the CA3 generator emission permitting analysis — specifically the multi-scenario run-hour quantification across routine testing, non-testing operations, and extended grid outage scenarios — is directly applicable to EKAPCD Authority to Construct modeling for RB Inyokern. The BAAQMD finding in the CA3 proceedings that Bay Area data centers had operated generators for non-testing purposes at rates exceeding regulatory expectations due to grid instability is particularly relevant given the relative isolation of SCE's IWV service territory and NAWSCL's priority grid reservations.

10. SUMMARY OF CUMULATIVE ANALYSIS

This analysis supports the cumulative impacts analysis prepared for the RB Inyokern Data Center pursuant to CEQA Guidelines 15130 and 15064(h). The cumulative analysis evaluates the project's incremental contribution to environmental effects when considered together with the past, present, and reasonably foreseeable future projects identified in Section 5.

The cumulative analysis examined ten resource categories — water supply and groundwater, air quality and greenhouse gas emissions, traffic and circulation, biological resources, energy infrastructure and electrical grid, noise, public services, land use compatibility, cultural and tribal cultural resources, and hazardous materials — across the eleven cumulative reference projects identified in Section 5 and the existing baseline described in Section 6. The analysis is supported by the consultant studies and agency documentation referenced throughout this document, including the QK Water Supply Assessment (January 2026), QK Air Quality Impact Analysis (February 2026), QK Biological Analysis Report (December 2025), WJV Acoustics Report No. 25-45 (March 17, 2026), SCE Method of Service Study MOS174 (March 30, 2026), the BSK Phase I Environmental Site Assessment (G25001225), and the executed Inyokern Community Services District Will-Serve Letter (April 2, 2026).

Significance determinations and the corresponding mitigation measures for each resource category are presented in the main SPPE Application, Section 4 (Environmental Information), consistent with CEC Appendix B and CEQA Guidelines 15126.4.

11. VERIFIED SOURCES & DOCUMENT RECORD

All projects, specifications, and regulatory data in this document were independently verified through the sources listed below as of April 2026. Project-specific data was provided directly by R&L Capital Inc and VW Construction Services.

Source	Reference / URL
Inyokern CSD Executed Will-Serve Letter	Inyokern CSD — April 2, 2026; APNs 084-010-43/44/45/48; ADD 40,430 GPD / MDD 60,645 GPD / PHD 101,075 GPD; PUE 1.41
SCE Method of Service Study MOS174	Southern California Edison — March 30, 2026; 99 MW / 115 kV Kramer subtransmission; Confidential & Proprietary / CEII
WJV Acoustics Noise Analysis	Report No. 25-45 — March 17, 2026; Prepared for QK; Field measurements Jan 14–15, 2026; LT-1 = 66.5 dB Ldn; LT-2 = 60.2 dB Ldn
QK Biological Analysis Report	December 2025; Project #160268.05; Surveys Aug 26 + Nov 6, 2025; Floristic surveys April 8 + May 10, 2024
Air Quality & GHG Analysis (Feb 2026)	QK — Project #160268.05; AQIA + HARP2 HRA + AERMOD ambient; Construction: all years <EKAPCD threshold; Operations: NOx 18.6 t/yr, PM10 1.65 t/yr, GHG 2,379 MT CO2e/yr — all less than significant; Cancer risk 5.63E-06 (threshold 10E-06) — less than significant; BACT: SCR/DPF/DEF achieving Tier 4 Final-equivalent outlet emissions, subject to EKAPCD review; Cumulative: project 0.268% of Kern County NOx — not cumulatively considerable
Water Supply Assessment (Jan 2026)	QK; Project #160268.05; Total demand 36.83–49.10 AFY (12–16 MGY); 0.185% of 26,511 AFY projected basin supply; IWV overdraft 24,990 AFY; construction water 9–11 MG total; IWVGA 2025 Periodic Evaluation incorporated; SB 610 / Water Code §10910 compliance
Kern County Planning Portal	kernplanning.com kernplanning.com/environmental-doc/rb-inyokern-solar-project/
RB Inyokern Solar EIR / NOP	kernplanning.com/wp-content/uploads/2017/06/RB_Inyokern_Solar_NOP_IS.pdf
Edwards AFB Solar EIR	kernplanning.com/environmental-doc/edwards-afb-solar-project/
Windhub Solar NOP	psbweb.kerncounty.com/planning/pdfs/notices/windhub_solar_nop.pdf
Pappas Solar NOP (Mar 2026)	psbweb.kerncounty.com/planning/pdfs/notices/pappas_solar_nop.pdf
CalPortland Life of Mine NOP	psbweb.kerncounty.com/planning/pdfs/notices/NOP_Mojave_life_of_mine_CalPortland.pdf
Edwards AFB Solar NOP	psbweb.kerncounty.com/planning/pdfs/notices/EAFB_solar_nop.pdf
CEQAnet — State Clearinghouse	ceqanet.opr.ca.gov
IWVGA Pipeline EIR (SCH# 2023080020)	ceqanet.opr.ca.gov/2023080020
CA3 Data Center EIR (SCH# 2021080438)	ceqanet.opr.ca.gov/2021080438/2 CEC Docket 21-SPPE-01
CA3 Full EIR PDF	ceqanet.lci.ca.gov/2021080438/2/Attachment/VUT40k

Source	Reference / URL
IWVGA Pipeline Initial Study	static1.squarespace.com/... (SCH# 2023080020)
SR-178 Rehab Segment 1 (09-38331)	dot.ca.gov/caltrans-near-me/district-9/district-9-projects-list/09-38331
SR-178 Rehab Segment 2 (09-38330)	dot.ca.gov/caltrans-near-me/district-9/district-9-projects-list/09-38330
Kern COG Progress Report Feb 2025 (SR-14 09-39140)	kerncog.org/wp-content/uploads/2025/02/Progress_Report_202502.pdf
Inyokern 1203 Community Solar	powermarket.io/project/in yokern-1203.html
CA3 Data Center — CEC Project Page	energy.ca.gov/powerplant/backup-generating-system/ca3-backup-generating-facility
CEC eFiling — Docket 21-SPPE-01	efiling.energy.ca.gov
Cat 3516E HPD Generator Specs	Caterpillar LEHE2570-05 (05/23); EM4716-02/EM4718-02; 3,000 ekW Standby/Mission Critical
Johnson Matthey SCRT System	cSCRT 24/22S10x10-2+1-30/30; Drawing 202-C0039989 Rev B; Quinn Power Systems EWR 03711; Oct 2025
NFPA 110 TIA 22-1 (May 2024)	Tentative Interim Amendment — SCR inducement shutdown prohibition for Level 1 applications
Sensitive Receptor Map (Mar 2026)	RB Inyokern DC 99 MW SPPE — Appendix B §(g)(10)(B); Valley Wide Engineering & Construction Svcs
Kern County Environmental Info Form	Form 108 (8/2013); Site 50 acres; 238,000 sq ft; 48-month construction; 100–115 emp+visitors/day operations; 3 phases; phased commissioning / operations tied to SCE service; project life 25–30 years

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