

**DOCKETED**

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## **Inyokern RB Data Center effects on local infrastructure**

Because of unresolved technical and environmental concerns within the current public record, I respectfully request:

- 1) An immediate moratorium on further advancement of the project review until these issues are independently clarified and publicly vetted.
- 2) Full disclosure of all atmospheric and thermal assumptions used to derive projected water consumption estimates.
- 3) Independent verification of cooling-system performance under Indian Wells Valley summer conditions.
- 4) Expanded cumulative impact analysis, addressing future expansion phases and climate-warming scenarios.
- 5) A full CEQA review before irreversible infrastructure or permitting momentum proceeds.

The current public record appears insufficient for meaningful public evaluation of the project's true long-term impacts on water resources, infrastructure, and regional sustainability.

At issue is not merely the existence of a cooling system, but whether the project's publicly stated water-use projections accurately reflect real operational conditions in the Indian Wells Valley under prolonged extreme desert heat.

The application currently appears vague or incomplete regarding several critical engineering and environmental assumptions that materially affect cooling-system performance and evaporative water demand, including:

- Peak, dry bulb, temperature assumptions
- Wet bulb, temperature assumptions
- Humidity assumptions
- Duration of prolonged heat events
- Nighttime thermal recovery conditions.
- Future climate warming scenarios.
- Efficiency degradation during sustained high temperature operation.
- Water demand escalation during extended heat waves.

These omissions are significant because hybrid and closed-looped cooling systems remain highly dependent upon surrounding atmospheric conditions. Their operational efficiency can materially decline during prolonged extreme heat events especially when nighttime temperatures remain elevated and systems lose the ability to sufficiently recover thermally.

This concern is especially relevant in the Indian Wells Valley, where summer temperatures have repeatedly exceeded 110°F in recent years and nighttime temperatures during heat events often remain in the upper 70s and 80s.