

**DOCKETED**

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*Comment Received From: Kitty Reeve  
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## **Ground Water Modeling and Full Environmental Review Request**

To the California Energy Commission:

I am a resident of Ridgecrest / Indian Wells Valley writing to express strong concerns about the proposed RB Inyokern Data Center (99 MW, 50-acre project) under Docket 26-SPPE-01. I previously submitted comments early in the review process and wish to reinforce and expand upon them with additional detail.

**Core Concern: Significant Risks to Our Shared, Critically Overdrafted Groundwater Resource**

The Indian Wells Valley is a critically overdrafted basin under SGMA, with pumping consistently exceeding natural recharge in a desert aquifer that has no major rivers or surface water inputs. The basin is currently in active adjudication, with a 2040 sustainability target. Decades of use have already produced regional cones of depression and notable water-level declines.

The proposed project site lies in one of the most stressed areas of the basin. A December 26, 2025 Kincaid Responsive Report map (using Thiessen Polygons for 2014–2023 groundwater elevation changes) shows the site (near Hwy 395 / SR 178) in a red/purple high-decline zone with a dense cluster of domestic, mutual, and production wells that have experienced some of the largest drops in the valley over the past decade.

### **Hydrogeologic Risks**

Heavy groundwater pumping – whether for construction dewatering or operational cooling – creates a cone of depression that lowers the water table in a widening area around the site. In our low-recharge aquifer, this can lead to:

- Lowered or dry private and community wells
  - Reduced water pressure
  - Sediment intrusion into wells
  - Degraded water quality (higher mineral content, clogged appliances and fixtures)
- These effects are strongest near the pumping location but can propagate through the connected basin. Construction-phase impacts are often most acute (months to 1–2+ years), while operational cones of depression can persist for decades.

### **Real-World Precedents**

Similar data center projects have caused documented issues for nearby residents:

- Newton County, Georgia (Meta): Residents approximately 1,000 feet away reported sediment buildup, appliance failures, and collapsed water pressure beginning during 2018 construction. Problems have continued for over seven years.
- Beaver Dam, Wisconsin (Meta): Private wells went dry and creeks showed milky

surges with elevated aluminum during excavation and dewatering. While companies often dispute direct causation, the timing, proximity, and hydrogeologic mechanisms are well-documented in the literature.

#### Local Vulnerabilities

• Inyokern CSD: Serves ~800 people with primarily one active well and has experienced repeated outages and reliability issues. The project's proximity raises serious risks of localized drawdown, pressure loss, and reliability impacts.

• Ridgecrest and Valley-Wide: Effects may be more gradual (~5-10 miles away) but still concerning due to basin connectivity and existing stress in the intermediate area. Any future expansion (discussions of an additional 99 MW / 80 acres have been referenced by the developer/investors) would compound cumulative impacts.

#### Recommendations

I respectfully request that the Commission:

1. Require independent, site-specific hydrogeologic modeling that uses the latest water-level change maps (including the 2014-2023 Thiessen polygon data) and fully analyzes cumulative impacts, including potential expansion.
2. Mandate pre-project baseline monitoring of wells in the high-decline zone near the site.
3. Conduct a full CEQA environmental review that thoroughly addresses water resources, along with air quality, noise, light pollution, traffic, and other impacts.
4. Deny the Small Power Plant Exemption (SPPE) or impose strict, enforceable mitigation measures (such as proven water-neutral or extremely low-use cooling technology with real-time monitoring and offset requirements) if modeling shows any risk of adverse effects on existing users.

Water is our most precious and limited resource in the Indian Wells Valley. Economic benefits like jobs and tax revenue are important, but they must not come at the expense of long-term damage to our aquifer and community wells. A thorough, transparent, and science-based review is essential to protect the valley's future.

Thank you for considering these comments. I request notification of any hearings, workshops, or additional comment periods. I am happy to provide further information or the referenced map upon request.

Sincerely,  
Kitty Reeve