

**DOCKETED**

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## **Reject Application for Exemption - Full Environmental Review Warranted**

Please reject this application for an exemption as this project needs a full Environmental Review and should not move forward based on the potential impacts to the regional aquifer. Inyokern and Ridgecrest population centers, as well as the Naval Air Weapons Station (NAWS) at China Lake, rely entirely on subsurface aquifers for their water supply and the water supply in this region cannot support this project.

Appendix E.3 - part 2a of 3 of the CEC exemption application includes a Water Supply Assessment for R&L Capital Inc. by Quad Knopf, Inc. The Assessment provides the following estimates of water use: (1) The data center's total construction water use is estimated at approximately 9-11 million gallons; (2) During operation and maintenance of the proposed project, the total estimated annual water usage for the entire site is estimated to be between 36.83 to 49.10 acre-feet per year (12-16 MGY).

The estimates for water usage lack details or assumptions to evaluate their accuracy and appear to be much lower than industry reports (references provided at end). A 99 MW (roughly 100 MW) hyperscale data center operating 24/7 typically reportedly consumes between 500,000 and 2 million gallons of water per day. This volume equals the average daily usage of 15,000 to 60,000 households. Data centers in hotter climates (such as Inyokern's climate) require more water for cooling.

The Quad Knopf assessment concludes that the maximum water demand for this Project is estimated at 49.10 acre-feet/year (16 MYG) or 0.185% of the "projected available yearly supply of 26,511 acre-feet", and therefore, the Project will have "very little impact on groundwater use" in the area. However, the assessment greatly overestimates the "yearly supply" of groundwater in the region. Groundwater is primarily recharged from precipitation in the surrounding mountains. The Basin does not have any water importation infrastructure or significant surface water features. According to the Indian Wells Valley Groundwater Authority (IWVGA) Groundwater Sustainability Plan, the basin is in critical overdraft with approximately 20,840 to 28,000 acre-feet pumped annually. The plan sets a sustainable yield of only 7,650 acre-feet per year, requiring massive reductions or importation of water to reach sustainability by 2040. The sustainable yield estimate originates from the 2016 Indian Wells Valley Groundwater Basin Model produced by the Desert Research Institute for the U.S. Navy. This model determined the sustainable yield of the Indian Wells Valley Groundwater Basin based on numerical analysis and 15 independent basin studies conducted since 1969. If pumping rates stay consistent, the basin supply is projected to run dry in approximately 40 years. The aquifer is already in critical overdraft, pumping more than its "yearly supply," and cannot handle an additional large water source draining it. The assessment appears to rely on future imported water to meet

overdraft needs, but importing water is in the planning stages only.

Even the NAWS China Lake facility is limited in its water rights. A September 2025 final court decision in the Indian Wells Valley groundwater adjudication slashed the Naval Air Weapons Station (NAWS) China Lake's federal reserved water right from 6,783 acre-feet per year (AFY) to 2,008 acre-feet per year (or 654 million gallons per year). This limit significantly curtails future operational capacity and reduces the water allocated to support the base workforce residing in surrounding communities.

In conclusion, the applicant's assessment of impacts to the local water supply is wholly inadequate. A full environmental review should be undertaken if the project moves forward. Please reject the application for an exemption of environmental review. Thank you for your attention to this matter.

#### References:

1. AirSys North America, 2026. Article: "How Much Water Does a Data Center Use?" February 17.
2. Environmental and Energy Study Institute, 2025. Article: "Data Centers and Water Consumption."
3. California Department of Water Resources Sustainable Groundwater Management Program, 2022. Groundwater Sustainability Plan (GSP) Assessment Staff Report. January 13.
4. Desert Research Institute, 2016. Groundwater Resource Sustainability: Modeling Evaluation for the Naval Air Weapons Station, China Lake, California. September.
5. Indian Wells Valley Groundwater Authority, 2025. "The Science of Groundwater Sustainability: Data and Proven Studies Drive Indian Wells Groundwater Authority Sustainable Yield Findings." March 20.
6. Maven's Notebook, 2026. "RIDGECREST: The pipeline reality: Living in a desert region requires importing water." April 24.
7. SJV Water, 2024. "High desert groundwater basin in Kern to get \$50 million in federal funding; announces settlement with pistachio grower." December 12.