

<b>DOCKETED</b>	
<b>Docket Number:</b>	26-SPPE-01
<b>Project Title:</b>	RB Inyokern Data Center (RBIDC)
<b>TN #:</b>	270237
<b>Document Title:</b>	Kitty Reeve Comments - Opposition to SPPE — National Security, CEQA Notification Failures, and Proximity Risks Require Full Review
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Kitty Reeve
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/26/2026 6:38:43 PM
<b>Docketed Date:</b>	5/27/2026

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Submitted On: 5/26/2026  
Docket Number: 26-SPPE-01*

## **Opposition to SPPE – National Security, CEQA Notification Failures, and Proximity Risks Require Full Review**

I am a resident of the Indian Wells Valley / Ridgecrest area and strongly oppose granting a Small Power Plant Exemption (SPPE) for the proposed 99 MW RB Inyokern Data Center. This project is located only a few miles from Naval Air Weapons Station (NAWS) China Lake, and the available documents show significant gaps in CEQA notification, military coordination, and national security review. Because of these deficiencies, the SPPE must be denied, and the project must undergo a full Environmental Impact Report (EIR) with mandatory consultation of the U.S. Navy.

### **Failure to Notify the Navy**

Community reviewers have noted that no Notice of Preparation (NOP) or equivalent CEQA notification has been provided to the Navy, despite the project's proximity to military land and operations. Under CEQA, the Navy is a responsible or trustee agency due to potential impacts on air quality from diesel generators, noise and vibration, light pollution, electromagnetic interference, security and operational compatibility, and groundwater resources. Failure to notify the Navy is a procedural defect that warrants denial of the SPPE.

### **Proximity to NAWS China Lake and Adjacent Federal Parcels**

Local mapping and parcel research indicate that the project site is immediately south of a narrow stretch of federal land historically associated with NAWS China Lake holdings. Parcels such as 352-085-07 and 352-501-11 have been identified as potentially part of this federal strip. Even if ownership is not fully confirmed, the adjacency is real, and the Navy must be consulted on compatibility risks. This corridor appears to connect to broader NAWS China Lake withdrawn lands, increasing the likelihood that the project sits within a military influence area requiring review.

### **Unaddressed Risks Identified in Community Discussions**

Community members have referenced a "Navy Gap" analysis raising concerns about siting a large-scale AI data center near a weapons research and testing installation. While this analysis is not yet publicly filed in the docket, its existence underscores the need for a formal military compatibility assessment, review under DoD/AICUZ guidelines, and evaluation of electromagnetic, security, and operational conflicts. These issues cannot be evaluated under an SPPE.

### **A 99 MW AI Data Center Is Not Appropriate for SPPE**

The SPPE process is intended for small, low-impact facilities. This project is neither. Key concerns include 40 diesel generators with monthly testing, high-intensity electrical infrastructure adjacent to sensitive military operations, groundwater use in an over drafted basin, and light and noise impacts incompatible with nearby federal lands.

These impacts require a full EIR, not an exemption.

#### National Security Considerations

NAWS China Lake is one of the most important weapons research, testing, and evaluation facilities in the United States. Any project of this scale near the base must undergo DoD review, Navy environmental and compatibility review, security risk assessment, and evaluation of potential foreign investment or supply chain vulnerabilities. None of this can occur under an SPPE.

#### Conclusion

Because of the project's proximity to NAWS China Lake, the failure to notify the Navy, the unresolved federal parcel adjacency, and the significant national security, environmental, and community impacts, I urge the California Energy Commission to deny the SPPE, require a full Environmental Impact Report (EIR), and require formal consultation with the U.S. Navy and Department of Defense.