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EKCRCD Opposes SPPE for Inyokern RB Data Center

Dear Commissioners:

The Eastern Kern County Resource Conservation District respectfully submits this letter in opposition to the Small Power Plant Exemption (SPPE) request for the proposed RB Inyokern Data Center in Inyokern, California.

Eastern Kern County Resource Conservation District (EKCRCD) supports responsible economic development, job creation, or private investment in the Indian Wells Valley, including both Inyokern and the city of Ridgecrest. However, we strongly oppose projects that are likely to place substantial new demands on the critically overdrafted Indian Wells Valley Groundwater Basin, create significant environmental impacts, or undermine decades of local and state efforts to achieve groundwater sustainability.

BACKGROUND

The Indian Wells Valley has long been recognized as one of California's most water-stressed desert basins. The basin is designated as critically overdrafted under California's Sustainable Groundwater Management Act (SGMA), and multiple studies have concluded that groundwater extraction substantially exceeds natural recharge. The Indian Wells Valley Groundwater Authority (IWVGA) was designated the water basin manager and has an approved Groundwater Sustainability Plan (GSP). Historically, large-scale development proposals in the Indian Wells Valley have faced significant scrutiny because of their potential impacts on groundwater resources, military operations, and sensitive desert ecosystems. Concerns regarding groundwater depletion, military compatibility, and habitat fragmentation were central issues raised during review of the Ridgecrest Solar Power Project (2011), and in 2015, Kern County instituted a new agriculture moratorium due to similar concerns. Likewise, preservation of the groundwater resource supporting Naval Air Weapons Station China Lake was a significant factor in local and regional land-use planning efforts.

In response to ongoing groundwater overdraft, Kern County adopted the Indian Wells Valley Land Use Management Plan (2014) and related policies intended to limit expansion of new water-intensive development and protect both local communities and the strategic national defense mission of Naval Air Weapons Station China Lake.

Despite the IWVGA, the designated SGMA water manager, having had its Groundwater Sustainability Plan approved by the DWR, in 2022, due to on-going litigation challenging the adjudication authority of the IWVGA, all water-user rights remain in legal uncertainty. Adding an additional large-water user to this litigation could further complicate future legal proceedings and obfuscate, or possibly even void, prior rulings, which include water allocations.

FACTS AND CONCERNS

The Eastern Kern County RCD respectfully submits the following concerns for the Commission's consideration:

1. Groundwater Sustainability

The Indian Wells Valley groundwater basin remains in a state of critical overdraft.

Recent analyses range from an average natural recharge from 7,650 acre-feet per year (Desert Research Institute, 2016) to 14,000 acre-feet per year (IWW Water District, 2026), and while historical groundwater extraction has substantially exceeded recharge for decades, the pumping of groundwater continues to exceed 20,000 acre-feet per year (IWW Groundwater Authority, 2025).

Data centers are among the most water- and energy-intensive commercial developments constructed today and many complex factors impact these requirements including final cooling technology, climatic conditions, operating loads, and water quality.

According to the SPPE application, this data center is estimated to consume only 49 acre-feet per year, using an efficient hybrid cooling system. Ongoing research in water consumption shows that water usage is dependent on many variables including the number of days over 100 degrees F, adiabatic evaporation rates from the cooling towers, amount of total dissolved solids (TDS) accumulating in the blowdown water and climatic drought cycles. A one-megawatt data center typically uses 18.6 acre-feet a year, according to a study in Nature (2021). At 99 megawatts, the proposed RB Inyokern data center could use up to 1,822 acre-feet per year - almost as much as the local navy base or half of water used by the city of Ridgecrest 29,000 residents. Another research source from the Environmental and Energy Study Institute (2025) would put water consumption at an estimated 1,596 acre-feet per year. This seeming discrepancy between the application and established water research should support the Commission in requiring a complete and independently verified analysis of annual groundwater demand before considering any exemption.

2. Air Quality Impacts

The project proposes forty diesel-fired backup 3-MW generators with a combined available emergency generation capacity of approximately 120 MW. Although equipped with Tier 4 emissions controls, the operation, maintenance, and emergency use would generate emissions of nitrogen oxides (NOx), particulate matter (PM2.5 and PM10), volatile organic compounds (VOCs), carbon monoxide, and greenhouse gases which could increase rates of respiratory illness at the local Inyokern Elementary School (less than 0.5 miles) and other valley dwellers. The Commission should require a full assessment of cumulative air-quality impacts and environmental justice considerations for nearby residents.

3. Military Compatibility

The project is located within a region that has historically been subject to military compatibility concerns associated with Naval Air Weapons Station China Lake. The Commission should obtain formal consultation and review from Navy stakeholders regarding potential impacts to testing, radar systems, flight operations, electromagnetic interference, lighting, noise, vibration, and future mission requirements.

4. Biological Resources

The Indian Wells Valley serves as habitat and movement corridors for sensitive Mojave Desert species, including the Mohave Ground Squirrel, Desert Tortoise, and numerous migratory bird species. Additional industrial development and groundwater extraction may contribute to habitat degradation and ecosystem stress in an already fragile desert environment.

5. Wastewater and Infrastructure Impacts

The Commission should require detailed evaluation of wastewater generation, cooling-system blowdown disposal, hazardous materials management, and impacts on local infrastructure. Particular attention should be given to whether existing local wastewater facilities supporting an Inyokern population of 800 possess adequate capacity to accommodate project-related discharges without adverse impacts to groundwater quality.

6. Noise Pollution

The proposal supported by the SPPE states that nearby noise levels will remain within a safe zone of 45-55 dB. Research has shown that nearby communities, in this case potentially including elementary school children, can face persistent 48-60 dB noise levels, and noise levels of 70-90 dB can be heard in immediate data center vicinities, which in this case include a hardware store, the town's only market, and a gas station.

7. Heat Island Impacts

A little-studied factor contributing to some community concerns is the impact of condensed heat-intensive AI systems centers on their surroundings. In a hot desert environment, this is an issue of vital impact to local residents. Some studies have shown that the surrounding area can increase in temperature by as much as 4 degrees F. In the Indian Wells Valley, summer day-time temperatures might reach as high as 122 F, and night-time temperatures might cool to no lower than 80 F. In a community which relies on affordable swamp (evaporative) coolers for home cooling, this increase could cause significant resident stress.

8. Project Segmentation Concerns

Publicly available information indicates that the broader development concept may involve multiple phases. The SPPE application is based solely on Phase I of the project (99 MW) planned to be online for 2029. However, the RB Inyokern Data Center investment group of Wade and Cushman had cited on their website in May of 2026 that a Phase 2 data center, also 99 MW, was planned to come online by 2031. In addition, the developers (R&L Capital) own an additional 300 more acres in Inyokern. There are concerns, based on the possible historic piecemealing of another R&L Capitol project - the Trona 4 and 7 Solar Projects in Inyo County - that the 99 MW project may only be the start of an ever-expanding larger development. The Commission should carefully evaluate whether the proposed project constitutes part of a larger integrated development and whether full environmental review of cumulative buildout is warranted.

RECOMMENDATIONS

The Eastern Kern County Resource Conservation District respectfully requests that:

1. The California Energy Commission deny the requested Small Power Plant Exemption and require comprehensive environmental review through a full Environmental Impact Report (EIR) addressing groundwater, wastewater, air quality, biological resources, military compatibility, cumulative impacts, and climate impacts.
2. Kern County evaluate amendments to the Indian Wells Valley Land Use Management Plan to address future water-intensive industrial, agricultural, commercial, and residential developments within the critically overdrafted basin.
3. The Indian Wells Valley Groundwater Authority evaluate revisions to the Groundwater Sustainability Plan requiring transparent review of proposed high-water-use developments and associated groundwater demands.

4. State and federal policymakers consider legislation requiring enhanced public disclosure, groundwater impact analysis, and extended public-comment periods for major water-intensive projects proposed within critically overdrafted groundwater basins.

CONCLUSION

The Indian Wells Valley is already confronting severe groundwater overdraft and significant challenges in achieving long-term sustainability. Until comprehensive environmental review demonstrates that this project can operate without causing significant impacts to groundwater resources, biological resources, air quality, military operations, and local communities, approval of the requested exemption would be premature.

Thank you for your consideration.

Respectfully submitted,

Judith A. Decker

President

Eastern Kern County Resource Conservation District

Appendix A - Works Cited.

George, Babu. Health Consequences of Large Data Centers: Air Pollution, Noise, Water Use, and Environmental Justice. No. cnwyb_v1. Center for Open Science, 2026.

Marinoni, Andrea, et al. "The data heat island effect: quantifying the impact of AI data centers in a warming world." arXiv preprint arXiv:2603.20897 (2026).

Mytton, D. Data centre water consumption. Nature Clean Water 4, 11 (2021).

Yañez, Miguel. "Data Centers and Water Consumption | Article | EESI." Environmental and Energy Study Institute (EESI), 25 June 2025