

DOCKETED

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RB INYOKERN DATA CENTER

Application for Small Power Plant Exemption (SPPE)

Inyokern, Kern County, California

Docket Number – 26-SPPE-01

Appendix G, H,I Supplement - Section H.1 Revision 1

January 14, 2026

Jaymie Brauer
QK, Inc.
5080 California Ave. Suite 220
Bakersfield, CA 93309

RE: Trip Generation and Vehicle Miles Traveled Analysis for Proposed Data Center in Inyokern, CA

Dear Ms. Brauer:

This letter is in response to QK Inc.'s request for trip generation and vehicle miles traveled analysis of a proposed data center located in the northwest quadrant of State Route 178 and State Route 395 in Inyokern, CA. The project will consist of a 270,218 square foot data center. A conceptual site plan is attached.

Construction Phase

Construction is anticipated to begin in 2027 and will require approximately 48 months to complete (four years). Depending on the construction schedule, the daily workforce will peak at 600 construction personnel. On average, there will be 150-200 construction personnel on site daily, with vehicle trips arriving and departing throughout the workday. It is anticipated that construction personnel will carpool to and from the project site, so a carpool factor of 1.5 was applied to the average daily traffic. It is also anticipated that approximately 30% of the average daily vehicle trips will occur during the AM and PM peak hours. Table 1 shows the calculations for the construction traffic based on the above information and assumptions.

Table 1
Construction Trip Generation

Traffic Type	Variable (Personnel)	ADT*	AM Peak Hour Trips		PM Peak Hour Trips	
			In	Out	In	Out
			Trips	Trips	Trips	Trips
Construction Personnel	200 (average per day)	267	25%	5%	5%	25%
			33	7	7	33

*Carpool factor of 1.5 applied.

As shown in Table 1, the construction phase is anticipated to generate 267 daily trips, 40 AM peak hour trips and 40 PM peak hour trips. Per the *Kern County Division Nine: Standards for Traffic Engineering*, the threshold for requiring level of service analysis is 50 trips in the peak hour. The

construction phase of the project does not exceed the peak hour threshold of significance established by Kern County; therefore, no level of service analysis is required.

Operational Phase

Trip generation volumes for the proposed land use for the operational phase were calculated using the Institute of Transportation Engineers (ITE) Trip Generation, 12th Edition. The trip generation is based on the ITE Code 160 (Data Center). The results are shown in Table 2.

Table 2
Trip Generation

General Information			Daily Trips		AM Peak Hour Trips			PM Peak Hour Trips		
ITE Code	Development Type	Variable	ADT RATE	ADT	Rate	In % Split/ Trips	Out % Split/ Trips	Rate	In % Split/ Trips	Out % Split/ Trips
160	Data Center	270.218 1000 sq ft GFA	eq ¹	241	eq ¹	71% 17	29% 6	0.05	19% 3	81% 11

¹Equation (eq) represents the ITE 12th Edition fitted curve equation.

As shown in Table 2, the proposed project is anticipated to generate 241 daily trips, 23 AM peak hour trips, and 14 PM peak hour trips. The operational phase of the project does not meet the 50-trip peak hour threshold required for further analysis, as established by Kern County; therefore, the level of service is anticipated to remain the same.

Traffic Analysis

The published daily capacity of a two-lane roadway in Kern County, such as State Route 178 within the study scope, is approximately 15,000 vehicles per day. Based on the most recent traffic volume data provided by the Caltrans Traffic Census Program, the average daily traffic volume for the segment of the 178 within the project scope is approximately 3,300 vehicles per day. Kern County uses a Volume-to-Capacity (V/C) ratio to determine a roadway's level of service. A (V/C) > 0.80 is typically considered below level of service C and may require mitigation. In the case of the segment of State Route 178 within the study scope, the volume-to-capacity ratio is $(3,300/15,000) = 0.22$, which is less than 0.80, therefore the roadway segment is currently operating at an acceptable level of service and will continue to do so with the addition of project traffic.

Vehicle Miles Traveled (VMT)

Background

In 2013, the state of California enacted legislation (SB 743) which required the Governor's Office of Planning and Research (OPR) to identify new metrics for measuring and mitigating transportation impacts within the California Environmental Quality Act (CEQA). For land development projects, OPR recommended replacing the metric of vehicle delay, as defined by level of service (LOS) and other

similar measures, with VMT metrics based on project land use. Regulatory changes to CEQA Guidelines incorporating SB 743 were approved on December 28, 2018. Statewide implementation began on July 1, 2020.

Under CEQA, lead agencies have the authority to establish their own VMT significance thresholds and analysis methodologies. At the time of this letter, Kern County has not yet adopted VMT guidelines. Therefore, the VMT analysis was completed using the guidelines and thresholds identified in the *California Governor's Office of Research and Planning Technical Advisory (OPR TA)*, dated December 2018.

The VMT Guidelines contain criteria for determining whether a land use project may be screened from a detailed VMT analysis. These "screening" criteria relate to project size, location, and accessibility to transit. The project does not meet any of the screening criteria. Therefore, a detailed VMT analysis was conducted for the mixed-use project.

As defined in the OPR TA, the project can be evaluated using the VMT per capita metric. Per the OPR TA recommendation, data center land uses less than 15% below the existing regional VMT per capita will indicate a significant VMT impact.

VMT Calculation Methodology

Regional VMT

The Kern Council of Governments (KernCOG) provided regional Traffic Analysis Zone (TAZ) information detailing vehicle types, trip types and respective trip volumes for the region of Kern County where the project is located. The analysis also considers the land uses, population draws, and types of activities within the analysis zone. Based on the KernCOG model, the regional average VMT by land use was found to be 36.85 (see analysis details attached). The OPR TA threshold of significance is a VMT of 31.32.

Project VMT

The average VMT of the project was estimated by distributing and assigning project traffic to the street network and calculating the average miles traveled per project trip. The VMT calculation summary and results are attached to this letter. The output gives a detailed summary of each trip assigned to the street network. The average VMT for the project was determined to be 27.13, which considers trips to areas in Los Angeles to the south, as well as Bakersfield and other Central Valley locations to the west. Table 3 shows the regional VMT, OPR threshold of significance for the regional VMT, and the project VMT.

Table 3
Regional & Project VMT Comparison

Regional VMT	OPR Threshold* for Regional VMT	Project VMT	% Below Regional VMT
36.85	31.32	27.13	30.37

*15% below the regional VMT.

VTM Conclusion

As shown in Table 3, the project VMT (27.13) is 30.37% below the regional VMT (36.85) and does not exceed the OPR TA regional threshold of significance of 31.32. Therefore, the project is expected to have a less than significant transportation impact and no further VMT analysis is required.

Please contact me should you have any questions.

Very truly yours,

DRAFT

Ian J. Parks
R.C.E. 58155
SSH/MEA

Attachments

Kyle and Robbie,
Please see Ian Park's concurrence with your comments below. Thanks jlb

Jaymie L. Brauer
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From: Ian Parks <IParks@ppeng.com>
Sent: Tuesday, June 23, 2026 8:31 AM
To: Jaymie Brauer <Jaymie.Brauer@qkinc.com>; Mark Assi <massi@ppeng.com>
Subject: Re: RBIDC - Construction Worker Trip Generation Tables

Good morning Jaymie, we have reviewed the table provided and we concur with the method and analysis. Let me know if there are any other follow up questions.

Ian Parks, PE
Principal Engineer
RUETTIGERS & SCHULER | PROVOST & PRITCHARD
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From: Jaymie Brauer <Jaymie.Brauer@qkinc.com>
Sent: Friday, June 19, 2026 10:35 AM
To: Ian Parks <iparks@ppeng.com>; Mark Assi <massi@ppeng.com>
Subject: FW: RBIDC - Construction Worker Trip Generation Tables

Hi Ian and Mark-
please see Kyle's email regarding the CEC request and their attempt to reconcile.
If you can please review and send an email confirming, it would be greatly appreciated.

Please let me know if you have any questions. jlb

Jaymie L. Brauer
Principal Planner
(661) 616-2600 Office

RBIDC — Construction Worker Trip Generation Tables

Average Daily Workers (all phases)	200	<i>H.1 Trip Generation Analysis (Provost & Pritchard, Jan 14, 2026)</i>
Carpool Factor	1.5	<i>H.1 Trip Generation Analysis (Provost & Pritchard, Jan 14, 2026)</i>
Worker Trips per Day [=200×2÷1.5]	267	<i>H.1 Trip Generation Analysis (Provost & Pritchard, Jan 14, 2026)</i>
Average Miles per Trip (one-way) [=27.13÷2]	13.57	<i>Back-calculated from H.1 VMT of 27.13 per employee — CONFIRM WITH PROVOST & PRITCHARD</i>
Kern COG Regional Average VMT / Employee	36.85	<i>KernCOG TAZ Model — H.1 Trip Generation Analysis (TN 269893)</i>
OPR Threshold of Significance [15% below 36.85]	31.32	<i>OPR Technical Advisory, December 2018</i>
Project VMT per Employee (operational — from H.1)	27.13	<i>H.1 Trip Generation Analysis (Provost & Pritchard, Jan 14, 2026)</i>
Total Construction Duration	48 months	<i>Application Table 1-2 (TN 269893)</i>
Total Working Days [48 × 21.7]	1042	<i>Calculated at 21.7 working days/month</i>
Project Life	25 years	<i>Application Table 1-2 (TN 269893)</i>
Project Life in Days [25 × 365]	9125	<i>Calculated</i>

TABLE 5.14-5 TOTAL WORKER VMT DURING CONSTRUCTION PHASE				
Construction Phase	Worker Trips per Day (2 trips/worker)	Average Miles per Trip (one-way)	Duration (Working Days)	VMT per Phase
Phase 1 — Site Preparation, Earthwork & Grading (approximately 6 months)	267	13.57	130	471,015
Phase 2 — Structural & Building Shell Construction (approximately 18 months)	267	13.57	391	1,416,667
Phase 3 — MEP, Data Hall Installation & Commissioning (approximately 24 months)	267	13.57	521	1,887,682
TOTAL	267		1042	3,775,364

Notes:

1. Worker trips per day = 200 avg. daily workers × 2 trips per day ÷ 1.5 carpool factor = 267 trips per day (H.1, Provost & Pritchard, Jan 14, 2026).
2. Average miles per trip = 27.13 project VMT per employee (H.1) ÷ 2 trips per worker = 13.57 miles. PENDING CONFIRMATION BY PROVOST & PRITCHARD.
3. Phase durations per Application Table 1-2 (TN 269893): 48 months total — Phase 1 approx. 6 months, Phase 2 approx. 18 months, Phase 3 approx. 24 months.
4. All construction trips routed to project site via State Route 178 consistent with Section 4.16 (TN 269893) and App. N.2 Figure T-4 (TN 269892).

TABLE 5.14-6 DAILY AVERAGE WORKER VMT DURING CONSTRUCTION PHASE		
Item	Amount	Source / Notes
Worker VMT during Construction (from Table 5.14-5)	3,775,364	<i>Sum of VMT per Phase from Table 5.14-5 above</i>
Project Life (25 years, expressed in days)	9,125	<i>Application Table 1-2 (TN 269893)</i>

Daily Worker VMT (total VMT ÷ project life in days)	413.7	<i>Calculated: Total VMT ÷ 9,125 days</i>
Average Daily Number of Workers over Construction Period	200	<i>H.1 Trip Generation Analysis (Provost & Pritchard, Jan 14, 2026)</i>
Average VMT per Worker per Day	2.07	<i>Calculated: Daily Worker VMT ÷ Average Daily Workers</i>
Kern COG Average VMT per Employee (Regional)	36.85	<i>KernCOG TAZ Model — H.1 Trip Generation Analysis (TN 269893)</i>
Threshold of Significance (15% below Kern COG Average)	31.32	<i>OPR Technical Advisory, December 2018</i>
Project VMT per Employee (Operational Phase — from H.1)	27.13	<i>H.1 Trip Generation Analysis (Provost & Pritchard, Jan 14, 2026, TN 269893)</i>
VMT Impact Finding	Less than Significant	<i>Project VMT (27.13) is 30.37% below regional average (36.85) and below threshold (31.32)</i>