

DOCKETED

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Opposition to the RB Inyokern Data Center (Docket No 26-SPPE-OI)

Additional submitted attachment is included below.



Kerncrest Audubon Society
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June 25, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 26-SPPE-01
715 P Street
Sacramento, CA 95814

Re: Opposition to the RB Inyokern Data Center (Docket No. 26-SPPE-01)

Dear Commissioners:

On behalf of Kerncrest Audubon Society, we respectfully submit this letter in opposition to the proposed RB Inyokern Data Center in Inyokern, California. While we recognize the importance of economic development and technological infrastructure, the California Energy Commission's obligation under the Small Power Plant Exemption (SPPE) process and the California Environmental Quality Act (CEQA) is to determine whether the project may result in substantial adverse environmental impacts. Based upon currently available information, the proposed project raises significant concerns regarding groundwater resources, desert biodiversity, wildlife habitat connectivity, migratory birds, and sensitive species that depend upon the Indian Wells Valley, surrounding mountain ranges, canyon springs and numerous wilderness areas.

The proposed facility would occupy approximately 50 acres near the intersection of U.S. Highway 395 and State Route 178 and include a large data center campus, extensive supporting infrastructure, and forty diesel-powered emergency generators providing up to 99 megawatts of backup generation. The project is currently under review by the California Energy Commission under Docket 26-SPPE-01.

Groundwater Resources and Mojave Desert Springs

The Indian Wells Valley Groundwater Basin is already recognized as a groundwater system in critical overdraft by the California Department of Water Resources. Any new large-scale industrial water demand must be evaluated not only for direct aquifer impacts but also for cumulative effects on groundwater-dependent ecosystems throughout the valley and adjacent mountain canyon springs. Even with efficient hybrid "closed loop" cooling systems, up to 30% increased water usage in desert environments is needed to replace water loss from the evaporative cooling tower and excessive blowdowns to clear the higher amount of total dissolved solids found in the depleted aquifer.

A comprehensive scientific review published in *Biodiversity and Conservation* concluded that groundwater extraction and aquifer drawdown are among the most significant threats to Mojave Desert springs and the ecosystems they support (Park, S. et al., 2021). The study found that desert springs are biodiversity hotspots that sustain both aquatic endemic species and wide-ranging terrestrial wildlife, and that spring depletion resulting from regional groundwater pumping can occur gradually over long periods, making impacts difficult to detect before ecological damage occurs. The authors specifically identify unsustainable groundwater extraction as a major threat to Mojave Desert spring ecosystems and document that species extinctions have already occurred in the Mojave as a result of human alteration and depletion of spring systems.

As Indian Wells Valley is on the northwest edge of the Mojave Desert, bridging the mountainous gap between the desert edge and the Great Basin and Range ecoregion, this area is a vital corridor for many species relying on the mountain canyon springs and vegetation. Because springs are expressions of groundwater at the surface, further aquifer depletion can reduce spring flow, degrade riparian habitat, eliminate water sources for wildlife, and diminish regional biodiversity. The Commission must therefore evaluate not only projected water demand at the project site but also whether cumulative groundwater extraction may contribute to long-term degradation of these fragile groundwater-dependent ecosystems.

Mohave Ground Squirrel

The California threatened Mohave Ground Squirrel (*Xerospermophilus mohavensis*) occupies portions of the western Mojave Desert and depends on intact desert scrub ecosystems. Habitat fragmentation caused by industrial development, utility infrastructure, road expansion, increased human activity, and associated disturbance can reduce habitat suitability and impair movement between occupied areas.

The proposed data center and associated infrastructure would add another large industrial footprint within a region already experiencing cumulative habitat fragmentation. We urge the Commission to require a comprehensive analysis of direct, indirect, and cumulative impacts to Mohave Ground Squirrel habitat and movement corridors.

Desert Tortoise

The federally threatened Desert Tortoise (*Gopherus agassizii*) remains one of the Mojave Desert's most imperiled species. Construction activities, increased traffic, noise, lighting, and habitat fragmentation are all recognized threats to tortoise populations.

The Commission should require detailed surveys and mitigation measures addressing not only project-site impacts but also indirect effects associated with utility connections, transportation corridors, construction staging areas, and long-term operational activities.

Pacific Flyway Migratory Birds

The Indian Wells Valley lies within a broader network of habitats used by thousands of migratory birds traveling the Pacific Flyway. In the Mojave Desert, natural springs, man-made wetlands, riparian corridors, and seasonal water sources provide critical stopover habitat for migratory species crossing otherwise arid landscapes. Both Birdlife International and The National Audubon Society have designated many of these local springs as "Important Bird Areas".

Scientific literature emphasizes that desert springs support migratory and wide-ranging terrestrial animals and provide ecological functions disproportionate to their size. Degradation of groundwater-supported habitats therefore has implications extending far beyond local wildlife populations.

Large industrial facilities also introduce collision risks, lighting impacts, noise disturbance, and habitat displacement for migratory birds. The Commission should require comprehensive avian studies that evaluate both construction and operational impacts.

Inyo California Towhee

The Inyo California Towhee, federally threatened endemic bird (*Pipilo crissalis eremophilus*), depends heavily on desert riparian vegetation and groundwater-supported canyon springs of the valley's southern Argus Mountain Range. Any reduction in groundwater availability that affects springs, seeps, wetlands, or associated vegetation communities may diminish habitat quality for this species.

Because groundwater declines can manifest gradually over many years, short-term hydrologic analyses may fail to capture long-term ecological consequences. The Commission should require

rigorous groundwater modeling and biological assessments that consider future impacts to riparian bird habitat.

Mohave Tui Chub and Aquatic Biodiversity

The federally endangered Mohave Tui Chub fish (*Siphateles bicolor mohavensis*) and other desert aquatic species such as the Slender Salamander (*Batrachoseps robustus*) depend on groundwater-supported riparian ecosystems. The scientific literature demonstrates that desert spring systems function as biodiversity hotspots and support unique aquatic communities that are particularly vulnerable to reductions in groundwater discharge.

Even where direct hydrologic connections are not immediately apparent, cumulative groundwater extraction across a basin can ultimately affect spring discharge and aquatic habitat quality. The Commission should carefully evaluate whether additional industrial groundwater demand could contribute to long-term degradation of habitats supporting sensitive aquatic species.

Wilderness Areas and Protected Public Lands

The Indian Wells Valley is surrounded by nationally significant public lands, including wilderness areas and protected desert landscapes that provide habitat connectivity for numerous sensitive species. Indian Wells Valley is surrounded by the Argus, Coso, Sierra Nevada, Scodie, El Paso and Rademacher mountains and hills, encompassing no less than seven federally designated wilderness areas: Sacatar, Owens Peak, Kiavah, El Paso, Chimney Peak, Argus and Coso Wilderness Areas. These lands represent irreplaceable conservation resources and contribute to the ecological character of eastern Kern County; their watershed and reservoir system must be preserved.

Industrial-scale development should not be evaluated in isolation. The Commission must consider how the project contributes to cumulative industrialization of a landscape that serves as an important ecological transition zone connecting multiple protected areas.

Mojave Desert Habitat Corridor and Landscape Connectivity

Along with the Wilderness Areas which can provide pristine habitat connectivity, much of the land in the valley is designated Bureau of Land Management - public land essential for maintaining wildlife populations, facilitating genetic exchange, and enabling species adaptation to climate change. The Mojave Desert Habitat Corridor provides critical movement pathways for a wide range of species, including desert tortoise, migratory birds, and other wildlife.

The cumulative effects of industrial development, transportation infrastructure, utility corridors, fencing, lighting, and human activity can incrementally degrade habitat connectivity even when individual projects appear relatively limited in footprint.

We therefore urge the Commission to evaluate this proposal within the broader context of regional habitat connectivity and ongoing conservation efforts throughout the Mojave Desert and Eastern Sierra Nevada foothills.

Conclusion

Kerncrest Audubon Society respectfully requests that the California Energy Commission deny the Small Power Plant Exemption application unless and until the applicant can demonstrate, through rigorous scientific analysis, that the project will not cause significant adverse impacts to groundwater resources, groundwater-dependent ecosystems, migratory birds, sensitive species, wildlife habitat connectivity, and the broader ecological integrity of the Indian Wells Valley and nearby mountain range canyon springs habitat.

At a minimum, we respectfully request comprehensive evaluation of:

1. Groundwater demand and cumulative aquifer impacts.
2. Effects on mountain canyon springs and groundwater-dependent ecosystems.
3. Impacts to the Mohave Ground Squirrel, Desert Tortoise, migratory birds, Inyo California Towhee, and Mohave Tui Chub.
4. Effects on nearby wilderness areas, habitat corridors and other designated protected public lands.

The Indian Wells Valley and surrounding Mojave Desert support unique biological resources that cannot be readily replaced once degraded. The Commission should apply the precautionary principles embodied in CEQA and ensure that these resources receive the highest level of protection.

Thank you for your consideration of these comments.

Sincerely,

Robert E. Parker
President, Kerncrest Audubon Society

Cc:

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Reference.

Parker, S.S., Zdon, A., Christian, W.T. et al. Conservation of Mojave Desert springs and associated biota: status, threats, and policy opportunities. *Biodivers Conserv* 30, 311–327 (2021).