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Dear Commissioners and Staff,

As a part-time Ridgecrest resident in the Indian Wells Valley, I have reviewed the applicant's full response package to CEC Data Requests Set 1. While the voluminous submission (85-page main response plus extensive appendix supplements and revisions) provides additional modeling, clarifications, and some improvements over the original application, it does not demonstrate that the project will have no substantial adverse environmental impacts. I urge the CEC to deny the Small Power Plant Exemption or require a full Application for Certification with comprehensive CEQA review.

The applicant's package offers measures such as hybrid chiller/VRF cooling with efficiency features (minimum 5.0 cycles of concentration and economizers), generator testing limited to 50 hours per year per engine (sequential and daytime only), updated noise analysis (TN 271095) showing normal operations at 41–49 dBA Leq, multi-load health risk assessment results below thresholds, and GSP-related augmentation fees. Sensitive receptors, including Inyokern Elementary School approximately 0.8 miles southwest, are modeled. A Specific Plan Amendment was filed with Kern County regarding the future road reservation, and the project references compliance with airport land use height limits.

Water resources remain inadequately addressed for a critically overdrafted basin. The ~49 AFY claim is presented as de minimis relative to basin totals or GSP targets. However, the Indian Wells Valley groundwater basin is critically overdrafted with decades of storage loss; sustainable yield estimates vary (GSP ~7,650 AFY; recent technical working group analyses ~14,300 AFY), while historical/recent pumping has been ~20,000+ AFY. Any additional consumptive use (even a small amount) contributes to cumulative overdraft and affects local wells (documented declines near the site area). Hybrid/chiller + evaporative components in extreme desert conditions (high temperatures, low humidity, heat waves, potential heat island from the large facility) can increase real-world evaporation beyond modeled assumptions. I specifically request an independent third-party review of the cooling water balance (including sensitivity to climate extremes and variable IT loads), clarification of on-site well role/impacts, and explicit no-net-increase or dry-cooling commitments. The Will-Serve Letter and GSP fees do not substitute for full CEQA cumulative analysis or guarantee long-term sustainability by 2040. Construction trucking adds secondary impacts.

Noise and air quality analyses understate realistic operational scenarios. The supplemental noise study focuses on normal ops or single-generator testing. In practice, utility outages, PSPS events, or grid stress could require multiple or many generators running simultaneously or for extended periods. Desert conditions allow sound to carry; cumulative effects on nearby residents (~0.5+ miles), quality of life, sleep, and Navy

China Lake operations/missions deserve fuller multi-gen and outage-scenario modeling. Similarly, air quality/HRA uses limited testing assumptions and shows low risk at modeled receptors, but warm-up emissions, variable loads, cumulative sources, and sensitive populations (children, elderly, military families) warrant a more conservative or expanded cumulative HRA. I request revised modeling for simultaneous/extended generator use (noise contours, emissions, health risk) and enforceable conditions that match real-world needs rather than optimistic testing limits.

SPPE process and piecemeal concerns further weaken the application. The project is structured at the 99 MW SPPE threshold (with nameplate/generating capacity above the served load via redundancy). Public comments have raised credible questions about potential larger phased buildout. Deferrals on final engineering (SCE details, exact layouts) and reliance on future Kern County CUP/EKAPCD permits leave significant gaps. SPPE is intended for projects without substantial adverse environmental impacts; water sustainability, air/noise in a sensitive location, and cumulative effects in an already stressed basin and near military assets raise legitimate questions about whether full Application for Certification or equivalent comprehensive CEQA review is required.

Other gaps include biological and cultural mitigations that rely heavily on pre-construction surveys and future coordination. Cumulative impacts (other data centers regionally, heat island, traffic, fire risk, long-term energy demands) receive limited treatment. Public review time for hundreds of pages of new/revised material is short. While the developer has expanded on specific design features and some guard rails to mitigate concerns, real-world experience with similar data center projects shows that both promised mitigations and original design plans often fall short after construction. In many cases the plans were overly optimistic or the technology has not performed as expected under real-world conditions, leading to major problems. For example, a Georgia data center recently used nearly 30 million gallons of water unnoticed and unbilled until residents complained about low water pressure. A massive AI data center project in Southern California's Imperial Valley is suing the Imperial Irrigation District for access to 260 million gallons of water annually after initial plans to use recycled wastewater fell through. Operational noise and air pollution often create intolerable living conditions, declining property values, and limited recourse for residents who find themselves unable to sell or move away. I request enforceable monitoring with public reporting and adaptive management triggers to help address this pattern. This undermines confidence that the proposed mitigations here will deliver reliable long-term protection for our shared valley resources.

Even with the measures described in the response package, residual and significant unavoidable impacts to our shared groundwater resources, air quality, noise environment, military mission compatibility, airport operations, and quality of life for Inyokern and Ridgecrest valley residents will persist. The CEC should not grant an SPPE on this record. I request denial of the exemption, or at minimum, a full environmental review process with robust independent analysis of cumulative impacts, real-world operational scenarios, and enforceable conditions that prioritize direct on-site reductions over reliance on fees or offsets.

Thank you for your consideration of these comments and for protecting the resources and communities of the Indian Wells Valley.