

DOCKETED

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Public Comment Opposing the Small Power Plant Exemption for the RB Inyokern Data Center (Docket No 26-SPPE-01)

Additional submitted attachment is included below.

FROM: The Administrative Committee of the Indian Wells Valley Domestic Well Owner's Association

To: xxx

Subject: Proposed Inyokern, CA, Data Center

Date: July 11, 2026

This comment letter is written by individuals with many decades of direct technical work and analysis for the US Navy and other US Armed Forces. This Basin is the location of the largest US Navy R&D Center in the US and it is our home. China Lake employs over 5,000 civilians from within the Indian Wells Valley where the payroll and contracts support 80% of IWV's economy. Negative impacts to our environment and resources will potentially impact on-going technical advancements for the war fighter and our national defense. The China Lake Navy has written a protest letter concerning the Inyokern Data Center (IDC) with critical comments primarily about the claimed low use of water, the existing Basin groundwater overdraft issue, and infrared, and thermal environmental impacts that could impact sensitive testing on the Navy base ranges, that we agree with totally. The writers of this letter are also private well owners who have been directly involved in the groundwater shortfall issues of the Indian Wells Valley (IWV) Basin, also for decades.

We formed the Administrative Committee of the IWV Domestic Well Owners Association ten years ago. **This organization was involved in domestic well issues even before the California State declared the IWV as a *critically over-drafted Basin*.** We have been directly involved through the Technical and Policy Committees of the **Basin Groundwater Authority**. **This overall experience gives us a unique and very strong and detailed background and position for comment on the proposed IDC.**

While we can be sympathetic towards a "benign" data center project near Inyokern, CA on presently open land, there are many unexplored, unknown and known aspects that confound the project. With the limited information that is available, the IDC Project is far from being harmless. The primary issues that are obvious are water use, heat release from the data center computers and memory, and heat release from the diesel generators when in use. Electromagnetic interference is a likely harm to the Navy activities.

The proposed project will undoubtedly use *far more* water than is quoted in initial statements from the project managers, specifically about 50 ac-ft/yr. **In fact, in our State mandated "critically overdraft" Basin, there is no water for new users and as far as this Project is concerned, it is an unnecessary and poorly defined project.** The "data center" concept has ignited extreme interest from the stock markets and until recently, "only the sky was the limit". **At this point, no regulations including safeguards are in place and until very recent time only**

vague issues of safety standards and uncontrolled use of precious resources even exist. Recently, Anthropic CEO Dario Amodei has brought forth the need for Federal guidance and regulations.

This Basin has a California mandate to meet an overall groundwater use no greater than the Basin natural recharge by 2040. The present total pumping is about a factor of three greater than the natural recharge. **This IDC project has a water need, even if it is as small as 50 ac-ft/yr, that has a priority far lower than the farmlands that are being forced out of business and the mandatory cutbacks in groundwater use by the other major pumpers including residents of the City of Ridgecrest and the Navy Base itself as a result of decisions by the IWW Groundwater Authority responding to State demands.** These orders from the State are limiting the availability of a natural resource that has been assumed by all to be without any limits in past times.

There is a very recent article describing Data Centers and typical community impacts from the unusually hot weather in the eastern US. **The article “Extreme heat adds to strains on data centers and tensions in host communities” brings up numerous difficult issues including excess water use.** The article is in AP News, dated July 2, 2026 and written by Matt O’Brien and Kaitlyn Huamani. **This article further emphasizes the serious conflicts between DCs and electricity, water and the environment.**

Here is a list with detailed descriptions and comments of IDC issues that will affect Inyokern, the City of Ridgecrest and the China Lake Navy Base nearby.

1) The claim that the IDC will only use 50 ac-ft/yr is has not been thought through carefully. The condition that dry cooling can be employed for virtually all of the year is simply not true. There have been and there will be future years in the IWW that have many months where temperatures are above the mid 90 deg F for a large portion of the day. **At these temperatures, the dry cooling method becomes ineffective as a practical issue and wet cooling will of necessity be brought into play and the water use will become thousands of ac-ft/yr as wet cooling takes over.** The Inyokern CSD cannot supply any water beyond some small amount and the IDC cannot drill its own well without both the County and the Groundwater Authority approval. This approval is very *unlikely* considering the declared Basin critical overdraft. This leaves the IDC in a serious state without a solution.

For at least a month in late August and September, the humidity in this Basin is typically high, and is associated with a monsoon weather pattern. The wet cooling during this period will be less effective and even more water will be used in an attempt to maintain an adequately low and stable temperature of the sensitive electronics of the IDC. **The actual water use demanded by this project must be examined carefully by fully knowledgeable engineers, not simply**

taken from advertisement by the manufacturers of the AC equipment. Hybrid cooling methods are complicated and restrictive in what they can actually do.

The document offered to the California Energy Commission by R&L Capital, Inc., the responsible party for this project, does not include the *approved* Groundwater Sustainability Plan submitted to the Department of Water Resources by the IWW Groundwater Authority. It is essential to observe that the IWW Groundwater Authority has the legal authority to limit groundwater extraction in the IWW. The document supplied for the 44 diesel generators comprising a “small power plant” to the California Energy Commission mentions that the IDC may drill a well on its property but does not say anything about the limitations that exist.

2) The effects of 99MW of electrical power as it is converted to waste heat are localized above and around the Data Center. It is commonly called a heat island effect. The temperatures in this super- heated zone on average are not that alarming but the peak temperatures are a different story. Slight winds can disrupt the “island” and can minimize the strongest effects. Unfortunately, our prevailing winds will carry this very hot air onto the Navy Base and beyond. The effects on the Navy function can be modelled but it is obvious that there are no effective palliatives to the consequences. The very nearby Inyokern Airport will also be seriously affected at times. Depending on wind direction and speed, the atmospheric refraction variations with temperature can create a dizzying image for pilots attempting to land at the airport. The danger here is obvious.

3) The presence and effects of noise including especially low frequencies that cannot be heard by normal humans must be examined carefully. **Especially of concern are the low and high frequencies created by the presence of thousands of electronic circuit elements that are being switched on and off continuously and the noise emission from the 44 diesel generators ostensibly supplying emergency power only.**

The low frequency components are the most difficult to control. This issue will be of concern to nearby residents, the Inyokern Airport and to the Navy as an uncontrolled environmental element that can potentially interfere with human health, ongoing airplane flight instrumentation and range and laboratory testing.

4) **Stray night time lighting will be of direct concern to the very nearby Inyokern Airport and to the Navy. The Navy and the Inyokern Airport have stated *dark sky needs* that have been described in some detail and fully supported by the County and the City of Ridgecrest. The photo of the facility that is shown on the web description of the project looks distinctly like a California State prison with high security fencing and lighting. It is realized this is an artist’s rendition. What will the real project look like?**

5) This project will likely produce almost unimaginable electromagnetic fields propagating out from the high frequency electronics. Every unit is undoubtedly shielded but the overall effect is largely unknown and is potentially dangerous in many ways. **Interference with China Lake Navy projects is clearly a concern.**

6) The projects that China Lake Navy Base could undertake would likely include classified projects, especially with the close proximity of the IDC. It is not obvious that any consideration has been made for such projects and the Navy's substantial inherent security requirements. **This is new territory and the restrictions that are implied are far reaching.**

7) A comprehensive EIR with full disclosure of all of the parts of this complex project must be accomplished before going forward. The IDC's environmental impacts could potentially lead to loss of critical technological research and testing applied to supporting the war fighter and national security. The domino effect will mean the loss of current and future work and jobs at the China Lake Navy Base, IWV's primary employer, critically affecting the local economy.

8) **"The viable projects will be the ones that can prove grid logic, water discipline, economic value, and public legitimacy before opposition hardens into law."** This very prescient sentence has been copied from an article "California City Approves First Voter-Enacted Data Center Ban" by Shane Snyder writing for the "Data Center Knowledge", June 3, 2026. **This one sentence summarizes our concerns about the Inyokern Data Center as proposed.**

Signed,

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