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RBIDC Request for Full EIR and Complete Review - Docket 26-SPPE-01

Kelly Betts
Resident of Ridgecrest

September 29, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

Re: RB Inyokern Data Center, Docket No. 26-SPPE-01
Subject: RBIDC Request for Full EIR and Complete Review - Docket 26-SPPE-01

Dear Commissioners and CEC Staff:

My name is Kelly Betts, and I live in Ridgecrest. I am submitting these comments because this project may affect the water, electricity, health, safety, environment, and public services our community depends on.

REQUEST FOR A FULL ENVIRONMENTAL IMPACT REPORT

I ask the CEC to prepare a full Environmental Impact Report regarding the proposed data center in Inyokern. California law requires an EIR when facts support that a project may cause a significant environmental effect. Public agencies and service providers have raised concerns about water, electricity, air quality, schoolchildren, biological resources, aviation, and the China Lake Naval Base mission. An EIR would allow those disputes, reasonable alternatives, and enforceable protections to be reviewed in public before the CEC decides the exemption. (Public Resources Code section 21080; CEQA Guidelines section 15064; TNs 270501, 270593, 270613, 271008, and 271977.)

COMPLETE AND CONSISTENT PROJECT DESCRIPTION

I am concerned that important parts of the project remain conceptual, incomplete, or spread across many revised filings. The application says that final information is still pending for transmission rights-of-way, electrical and noise calculations, hazardous-material quantities, cooling design, the water balance, and service arrangements. CEC staff also requested missing information about construction water, truck trips, temporary access, staging, generator operation, and sensitive receptors. I ask the CEC to require one updated and internally consistent project description, with clear maps and operating

limits, before circulating an environmental document. (TN 269893, section 3; TN 270553; TN 271129.)

REVIEW THE WHOLE DEVELOPMENT

The environmental review should cover the whole development, not only the diesel generators. It should include the data-center buildings, cooling equipment, fuel storage, batteries, solar equipment, onsite and offsite substations, both proposed 115-kV lines, water and sewer facilities, the emergency well, drainage, access roads, construction areas, telecommunications, lighting, landscaping, and any helicopter-related use. I ask the CEC to map and analyze all connected facilities and temporary construction areas together so impacts are not shifted to later County, utility, or service-provider permits.

ENFORCEABLE MONITORING AND PUBLIC REPORTING

Promises to submit a future plan are not enough unless someone must review the plan, inspect the work, report results, and correct violations. I ask the CEC to adopt a detailed Mitigation Monitoring and Reporting Program before any exemption. For each requirement, it should identify the standard, deadline, responsible party, reviewing agency, public report, enforcement authority, corrective action, and consequences of noncompliance. Any local agency asked to oversee the program should accept that responsibility in writing, and the CEC should retain an enforcement backstop. (CEQA Guidelines section 15097.)

PUBLIC REVIEW AFTER MAJOR DESIGN CHANGES

Final engineering may change the power-line routes, construction footprint, cooling demand, well design, battery system, structure heights, biological impacts, or required mitigation. I ask the CEC to compare every material later change with the environmental analysis in a written public determination. If new information reveals a new significant effect, a substantially worse effect, or substantially different mitigation, the revised environmental document should be circulated again for public and agency review before a decision. (CEQA Guidelines sections 15073.5 and 15088.5.)

WATER USE AND COOLING ASSUMPTIONS

The Indian Wells Valley Water District identified a serious inconsistency in the project's claimed water use. The claimed annual use works out to about 0.1 to 0.12 liters per kilowatt-hour, but the applicant's own sustainability table lists 0.1 to 0.3 liters per kilowatt-hour for closed-loop chilled water and 0.5 to 2.0 liters per kilowatt-hour for adiabatic cooling. Because the proposed system is described as a hybrid that includes evaporative or adiabatic features, I ask the CEC to require a complete water balance, explain the difference, and impose enforceable daily and annual water-use limits. (TN 269666, Appendix O, Table B.1; TN 271977.)

ICSD WATER AND WASTEWATER CAPACITY

The project relies on the Inyokern Community Services District (ICSD) for its main water and wastewater service. The Indian Wells Valley Water District states that the proposed annual demand of up to 49.1 acre-feet is almost half of ICSD's stated 102-acre-foot groundwater allotment. It also reports State Water Board concerns about ICSD's ability to provide safe and affordable water, possible consolidation, and litigation concerning replenishment fees. I ask the CEC to require proof of lawful, reliable, long-term water and wastewater capacity and a realistic fallback that does not assume another district will honor ICSD's Will-Serve letter. (TN 271977.)

ELECTRICITY NEEDED FOR COMMUNITY WELLS

Groundwater is the Indian Wells Valley's only local water source, and the Water District reports that approximately 800 electrically powered groundwater wells are near the proposed project. I am concerned that a new 99-megawatt load could compete with power needed to pump community water during extreme heat, a Public Safety Power Shutoff, or another grid emergency. I ask the CEC to analyze whether the local grid can serve the data center without reducing reliability for public water systems, domestic wells, emergency services, homes, and businesses, and to explain what service priority the data center would receive. (TN 271977.)

WASTEWATER AND COOLING-TOWER BLOWDOWN

The project will generate cooling-system blowdown and other wastewater whose amount and quality depend on the final cooling design and water chemistry. I ask the CEC to require a complete wastewater balance, chemical characterization, pretreatment requirements, disposal method, infrastructure route, and written confirmation that the receiving system can lawfully and reliably handle the maximum discharge. A future characterization report should not be the first analysis of whether the wastewater can be accepted without harming the system or groundwater. (TN 269893, section 3 and proposed mitigation measures; TNs 271008 and 271977.)

AIR QUALITY AND EMERGENCY GENERATOR USE

I recognize that the applicant's revised air analysis evaluates several generator loads, warm-up emissions, and an assumed 150 hours per year of emergency operation. My concern is whether that emergency assumption covers reasonably foreseeable long outages and whether the final limits will be enforceable. I ask the CEC to explain the basis for 150 hours, evaluate longer or repeated outages and simultaneous emergency operation where appropriate, and require binding permit conditions for testing, hours, loads, emissions, and reporting. The analysis should protect nearby residents, children, older adults, and other sensitive people. (TNs 270553, 271094, 271129, and 271977.)

GENERATOR AND MECHANICAL NOISE

I recognize that the revised noise report models a conservative case in which all 40

generators and mechanical equipment operate continuously for 24 hours. I am not claiming that this scenario was omitted. I ask the CEC to independently verify that the report's equipment locations, sound levels, barriers, receptors, tonal or low-frequency characteristics, and final project design are accurate and conservative. Any noise limits, testing schedules, barriers, and complaint-response procedures should be enforceable and should apply during actual emergency operations as well as routine testing. (TN 271095; TN 271129, response to DR NOI-1.)

CHINA LAKE MISSION COMPATIBILITY

Naval Air Weapons Station China Lake raised concerns about long-term water supply, electromagnetic interference, and thermal plumes. The Navy stated that information was lacking about possible interference with weapons testing, telemetry, and range facilities, and that prevailing winds could carry heat, moisture, and exhaust plumes toward the test range. I ask the CEC to obtain and publicly address formal Navy input on water, electromagnetic interference, cooling and exhaust plumes, and any needed design limits before deciding the exemption. A future consultation should not replace the CEC's environmental analysis. (TN 270501.)

AIRPORT AND FAA REVIEW

The application is internally inconsistent about airport review. One table says a Kern County airport-land-use consistency determination was obtained and an FAA Form 7460-1 was submitted, while other sections say no FAA form is required and that County compatibility review will occur later. I ask the CEC to require a corrected status table and copies of the actual County, Airport District, and FAA submissions and determinations. Final heights, cranes, lighting, glare, cooling and exhaust plumes, landscaping, and stormwater features should be evaluated for aviation safety before approval. (TN 269893, application pp. 80, 584, and 600-601; TN 270613.)

SCE LINES AND SUBSTATION WORK

The applicant says two independent 115-kV routes will be constructed, but acknowledges that the public one-line diagram shows only one connection at the conceptual stage. Detailed Inyokern Substation upgrades, route rights-of-way, and other engineering information remain unfinished. I ask the CEC to require public maps and a complete description of both routes, substation expansion, underground sections, poles, construction areas, staging, access, noise, electromagnetic fields, and biological and visual effects before completing environmental review. Confidential utility drawings should not leave the public without enough information to understand environmental impacts. (TN 269893, section 3.2; TN 271129, response to DR PD-1.)

CLOSING REQUEST

For the concerns stated above, I ask the CEC to prepare a full EIR and issue any additional data requests needed to complete the record. At minimum, the CEC should

not circulate an environmental document or decide the SPPE until the project description is stable, the important technical conflicts are resolved, and all necessary protections are specific and enforceable. Preparing an EIR does not automatically decide whether the CEC can later grant an SPPE. However, Public Resources Code section 25541 allows an exemption only if the CEC can find that the project will cause no substantial adverse impact on the environment or energy resources. If the completed record cannot support that finding after all feasible mitigation, the CEC should deny the exemption.

Please place this comment and the cited docket materials in the administrative record for Docket 26-SPPE-01.

Respectfully submitted,

Kelly Betts
Resident of Ridgecrest