AGENDA

Imperial County Data Center Committee
Brawley Senior Center
575 J St, Brawley CA 92227
Monday, November 16, 2026
6:00pm

I. Preliminary Business
   A. Call to Order & Welcome
   B. Roll Call
   C. Pledge of Allegiance
   D. General Public Comment: (Limit: 3 minutes per speaker)

II. Administrative Matters
   A. Review and Adoption of Minutes: Approval of minutes from the previous meeting.
   B. Approval of Agenda: Review and adoption of the current order of the agenda.

III. Discussion & Action Items
   A. Revisit the Board of Supervisors' June 2026 Draft Guidelines for Data Centers
   B. Schedule Change – cancellation of December 21, 2026.

IV. Informational Items
   A. Presentation: Introduction To Noise Ordinance by Sharon Toland, Project Manager from Harris & Associates
   B. Presentation: Data Centers and Emerging Technology Land Use Assessment - Work Plan by Christian Barajas, Planning Service Director from the City of Brawley

V. Closing Business
   A. Member Reports & Announcements: Open floor for committee updates.
   B. Adjournment

II a

MINUTES

Imperial County Data Center Committee
City of Imperial Council Chambers
200 W. 9th Street
Imperial, CA 92251
Monday, November 2, 2026
6:00 P.M.

Committee Members:

Present

- Shleah Kay Edwards, Healthcare
- Peggy Price, District 3, Board of Supervisors
- Mike Goodsell, City of Holtville
- Mark Hamby, Unincorporated Local Government
- Flavio Grijalva Jr., Public Member
- Kristian Michelle Salgado, Environmental
- John, Hawk, District 5, Board of Supervisors
- John Grass, City of Brawley
- Andrew Schwartz, Organized Labor
- Gilberto Manzanares, City of Calexico
- Angel Hernandez, City of El Centro
- Dennis Morita, City of Imperial

Absent

- Oli Bachie, Non-Profit
- Michael Luellen, City of Calipatria
- Jefferey Nemeth, Energy Industry
- Sandie Finnell, Business
- Marjorie E. Marquez, Education
- Ann Michelle Holligner, Public Member

I. Preliminary Business

A. Meeting was called to order by Chairperson, Kristian Salgado at 6:00pm

B. Roll Call- 12 present, 6 Absent. Committee has a quorum of members

C. Pledge of Allegiance, led by Mike Goodsell

D. Public Comment- 3 minutes per speaker

i. Idell Burden
ii. Jake Tison
iii. Joseph Guilin

II. Administrative Matters

A. Review and Adoption of the Minutes. Motion to approve the minutes by Mike Goodsell, Seconded by Andrew Schwartz. 12 yes, 0 abstention, 0 no votes. Motion passed 12-0

B. Approval of the Order of the Agenda. Motion to approve the Order of the Agenda by Flavio Grijalva, seconded by Shleah Edwards. Yes 12, No 0, abstentions 0 votes. Motion passed 12-0

III. Discussion/ Action Items

A. Presentation by Food and Water Watch

- Presentation by representatives of Food and Water Watch, Andrea Vega and Noah Rapp.
- Food and Water Watch engage in various activities including the following:
  - Analyzing data center, water, and electricity demands
  - Data Centers that endanger water supplies
  - Location of data center is water stressed areas
  - Water and power rate increases
  - Fossil fuel power generation
  - Back up diesel generators
  - Noise pollution
  - Light pollution
  - Jobs
  - AI data centers threat to destabilize industry
  - Moratoriums and bans

- Shleah Edwards leaves at 6:35pm
  - Q&A
    - Questions raised whether this organization has considered the recent data center legislation that was signed into law. The bills are going into effect in 2028. Suggest a corrected report be submitted.
    - Water supply for projects in LA County ban in unincorporated areas. Discussion of water use analysis
    - Concerns about this presentation being once sided. Food and Water watch focuses on large spectrum with a focus on bans and moratoriums
    - Closed Loop cooling systems vs. open loop. Food and Water watch does not trust closed loops systems.

- Hypothetical question, if all concerns regarding water, power and environmental issues can be successfully mitigated, would Food and Water Watch change their position?
- When does a data center become a hyperscale data center?
- What is the rationale for a ban vs a moratorium?
- Presentation materials need to be submitted earlier for committee review.
- Need for a topics list needs to be developed, Data Center was visited in Loudon County which operated on a closed loop system. IID water and power representatives are needed to present to the committee.
- County's that are instituting bans are better funded. Speakers can be suggested by any committee member

IV. Informational Items

A. DCAC Webpage

Cynthia Medina, Clerk of the Board's Office reports that she will create a tab for posting of presentation material, forms and By-laws

B. Topics for discussion by Mark Hamby

- Committee's charge should be tasks that they are able to do.
- Wants to review what happened regarding the data center conflicts with the County
- Wants to hire our own experts to obtain information, reports, facts. Suggest the county provide funding.
- DISCUSSION
- He also stated that the committee should have packet materials 10 days prior to the meeting
- Should have a way for residents to submit comments
- Committee should focus on the 19 specific areas of the charge
- Bring policy draft back for review
- Work on Subgroups
- City's and County's are dealing with the same issues
- Should not allow industry the people don't want
- Ban's are an easy way out which is not the charge of the committee but rather fact finding.
- Public Comment

i. Joseph Guilin

V. Closing Business

A. **Member Reports,**

- Flavio Grijalva: Imperial County should not support economic needs of other counties, jobs need to be permanent and long term. We cannot compete with urban areas
- Mark Hamby: Small data centers should be encouraged, separate from hyperscale
- Andrew Schwartz: AB2619 addresses scale of data center, bills need to be examined and included in our findings.
- John Grass: the City of Brawley is working on guidelines and standard for data center applicants including standards, ordinances and zoning
- Gilberto Manzanares: We should emphasize local protection
- Mike Goodsell: It is hoped that we won't shirk our duties as a committee
- Mike Goodsell: We need to work on draft report using the guidelines
- Kristian Salgado: Committee openings. Ollie Bachie has resigned and the City of Westmorland is working finding a person to appoint. IID has declined the invitation to present to the committee citing current litigation. November16th we will have a presentation from Sharon Tobias from Harris and Associates who will address noise ordinances. The By-laws have been sent to the Board of Supervisors for approval.
- Dr. Kathleen Lang, County CEO reports that IID did not give a reason for decline the invitation to present at the committee.
- Kris Becker, County Counsel reports that the current moratorium expires on 11/20/2026. A public hearing regarding the extension will be held on 11/17/2026. It will be proposed to extend the moratorium to June of 2028
- Meeting location discussion regarding different alternatives, Brawley Teen Center may be available

VI. Meeting Adjournment

Meeting adjourned by acclamation. Yes Votes-12, No Votes-0, motion passes

III a.

DRAFT Imperial County Data Center Development Guidelines
For Consideration by the Imperial County Board of Supervisors

Purpose

The purpose of these guidelines is to establish development standards and policy considerations for proposed data center facilities within the County of Imperial unincorporated areas to promote compatible land use, protect community interests, ensure infrastructure reliability, support workforce development, and maximize local benefits while encouraging responsible economic investment.

These guidelines are intended to supplement existing County ordinances, zoning regulations, environmental requirements, and applicable state and federal laws through the development of a resolution, if directed by the County Board of Supervisors.

All guidelines should be interrupted to apply to unincorporated County land and do not supersede any city jurisdiction within Imperial County.

Land Use and Siting Standards

1. Elimination of By-Right Development
Data center facilities shall require discretionary review and approval by Imperial County and shall not be permitted as by-right uses, except within County-approved Specific Plan areas where such facilities are either expressly identified and their environmental impacts have already been evaluated, or within County-approved Specific Plan areas determined by the County to be substantially similar and compatible with previously evaluated land uses, zoning classifications, infrastructure assumptions, and environmental analyses associated with the adopted Specific Plan.

Within Specific Plan areas, the County may consider whether proposed data center uses are reasonably consistent with existing land use designations and previously analyzed development intensities and impacts and that a project would not result in new or more severe significant environmental impacts than approved uses within that Specific Plan.

2. Residential and Sensitive Receptor Buffer Requirements
Data center developments shall maintain a minimum setback of 1,000 feet from:

- Residentially zoned properties
- Existing residential developments
- Schools
- Daycare facilities
- Hospitals

- Public assembly uses, including parks, churches, community centers, and similar facilities

Additional setbacks may be required based on project-specific characteristics.

Infrastructure and Utility Standards

3. Pre-Construction Infrastructure Impact Assessment
Prior to commencement of site preparation or construction activities, project applicants shall commission, at the sole expense of the developer, an independent infrastructure impact assessment evaluating:

- Transportation and roadway impacts
- Utility capacity impacts
    - Water supply and wastewater requirements
    - Electrical transmission and distribution impacts
    - Telecommunications infrastructure
- Emergency response capacity

The County shall retain review authority regarding methodology and conclusions.

4. Utility Infrastructure Cost Responsibility
Data center developments shall bear all direct costs associated with infrastructure improvements necessary to support the project, including but not limited to:

- Electrical upgrades
- Water and wastewater infrastructure
- Roadway improvements
- Telecommunications infrastructure
- Public utility extensions

Project development shall not materially diminish existing utility reliability or service levels for residents, businesses, or public facilities.

5. Onsite Electrical Infrastructure
Primary electrical infrastructure intended to support data center operations, including substations and related facilities, should be integrated within the project site footprint unless otherwise approved by the County based upon demonstrated operational necessity. The applicant shall demonstrate the ability for their project to receive power in a way that adheres to applicable local, state, and federal utility policies and laws.

6. Microgrid and Energy Resiliency Integration
Developments are encouraged to incorporate onsite energy resiliency strategies, including consideration of:

- Renewable generation resources
- Microgrid capability

- Independent baseload power sources where feasible
- Backup generation systems
- Long-duration energy storage systems

The County encourages systems that improve grid resilience and reduce impacts on regional infrastructure.

Air Quality and Environmental Standards

7. Emission Reduction Technologies

Where backup generation systems are utilized, projects shall incorporate Best Available Control Technology (BACT) and all applicable emissions control measures required by regulatory agencies including the Air Pollution Control District.

Where technically feasible, applicants should incorporate advanced emission reduction technologies designed to minimize:

- Nitrogen oxides (NOx)
- Sulfur oxides (SOx)
- Carbon monoxide
- Fine particulate matter

8. Energy Storage Performance Standards

Projects utilizing energy storage systems should prioritize technologies that:

- Enhance grid reliability
- Reduce environmental impacts
- Improve operational safety
- Support long-duration energy storage capabilities

The County may evaluate emerging technologies as part of future policy considerations in accordance with applicable local, state, and federal policies and laws.

9. Water Consumption Disclosure

Applicants shall provide transparent documentation identifying:

- Estimated annual water demand
- Peak demand scenarios
- Water source(s)
- Cooling methodologies
- Reclaimed water opportunities
- Water conservation strategies

Documentation shall distinguish use of:

- Potable water
- Recycled or reclaimed water
- Closed-loop systems
- Open-loop systems

Documentation shall be in accordance with applicable local, state, and federal policies and laws.

Noise, Visual, and Community Compatibility Standards

10. Operational Noise Standards
Data center operations shall maintain a maximum operational noise level of 60 dBA at the project property boundary unless a more restrictive requirement applies through environmental review or applicable regulations.

11. Third-Party Noise Verification
Applicants shall conduct independent noise studies before and after construction to evaluate:

- Standard audible noise levels
- Low-frequency noise impacts
- Structural vibration impacts where applicable

Mitigation measures shall be implemented where necessary.

13. Construction Traffic Management Plan
Projects shall require construction traffic management plans that include haul routes, worker parking plans, dust control, and traffic mitigation.

14. Architectural Design Standards
Buildings located adjacent to major transportation corridors or visible residential areas shall incorporate architectural treatments designed to reduce large industrial visual impacts, including:

- Facade variation
- Material differentiation
- Visual articulation elements
- Architectural screening features

15. Landscape and Visual Screening Requirements
Projects shall incorporate visual screening measures including consideration of:

- Landscaped berms
- Tree and vegetation buffers
- Landscape screening
- Rooftop equipment screening
- Cooling equipment shielding

16. Dark Sky Lighting Standards
Outdoor lighting shall utilize downward-directed and shielded fixtures designed to minimize:

- Light trespass
- Sky glow
- Impacts on adjacent properties
- Nighttime visual impacts

17. Decommissioning Requirements
Applicant is responsible for full decommission and any environmental clean-up associated with the project (this applies to the construction stage, operation, post-operation). Prior to issuance of any building permit, applicant must provide acceptable reclamation plan and surety for abatement of project.

Workforce and Community Benefit Standards

18. Local Hiring and Workforce Development
Applicants shall demonstrate efforts to prioritize local workforce participation and maximize employment opportunities for Imperial County residents through:

- Local hiring initiatives
- Apprenticeship opportunities
- Workforce development partnerships
- Community College collaboration
- Vocational education partnerships
- Reentry workforce initiatives

Applicants should establish pathways toward long-term operational, technical, and skilled career opportunities associated with project construction and ongoing operations.

If the applicant determines that a sufficient local skilled workforce is not available to support operational positions associated with the project, the applicant shall identify those workforce gaps and partner with local educational institutions, community colleges, vocational training providers, workforce agencies, and other County-recognized educational entities to develop and implement training programs designed to prepare local residents for such positions.

Such workforce training programs shall be funded at the expense of the applicant and may include:

- Industry-recognized certifications
- Technical skills training
- Apprenticeship and internship opportunities
- Equipment and curriculum support
- Scholarships or tuition assistance
- Workforce pipeline development initiatives

Applicants shall demonstrate a reasonable plan for transitioning local residents into operational and technical roles over time, with the goal of increasing local workforce participation and reducing reliance on outside labor markets.

19. Participation in the Good Neighbor Community Benefit Agreement Program

Data center projects shall participate in the Imperial County Good Neighbor Community Benefit Agreement (CBA) Program, or a substantially similar County-approved framework, intended to establish a legally binding commitment between industry, the County, and the community to advance local prosperity and long-term community benefit outcomes.

Participation should demonstrate meaningful commitments aligned with County priorities, including consideration of the following community benefit areas:

- Workforce development and local job creation
- Educational partnerships and career pathway opportunities
- Community health and quality-of-life initiatives
- Environmental stewardship and sustainability efforts
- Support for local businesses and economic development
- Infrastructure and community enhancement investments

Applicants shall identify proposed implementation strategies, performance measures, and reporting mechanisms demonstrating how commitments will be achieved over the life of the project.

Where applicable, projects should coordinate with County-recognized community partners, workforce organizations, educational institutions, and community-based organizations to maximize local participation and measurable benefit outcomes.

The County may establish project-specific benefit commitments based on project scale, anticipated impacts, operational characteristics, and community needs.

20. Compliance Cost Responsibility

All costs associated with compliance, monitoring, studies, mitigation, reporting, and implementation of these guidelines shall be the responsibility of project applicants and shall not create financial obligations for Imperial County or participating community organizations.

21. Safety Services and Emergency Personnel Training

Applicants are required to coordinate with the County to develop a plan with fire, EMS, and emergency preparedness related to training and funding support for:

- Specialized equipment
- Specialized personnel training

IV. A.

INTRODUCTION TO NOISE REGULATION

11/16/2026

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TABLE OF CONTENTS

- Why Noise?
- Key Terms
- Noise Elements
- Noise Ordinances
- CEQA
- What does this mean for data centers?
- Questions

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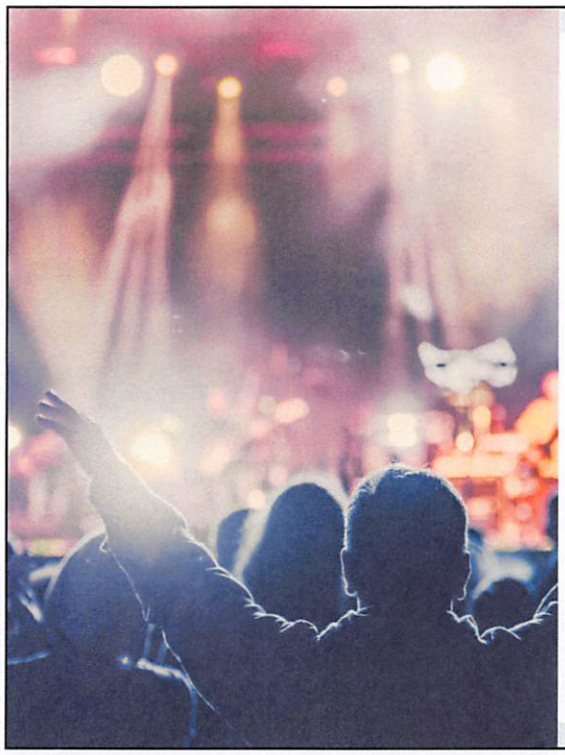

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WHY WE REGULATE NOISE

- Noise vs. Sound
- Stress
- Communication
- Hearing damage

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NOISE REGULATION TERMS

- Decibel (dB) – Logarithmic expression of sound level
  - 60 dB + 60 dB ≠ 120
  - 60 dB + 60 dB = 63
- A-Weighted decibels (dBA) – Emphasizes frequencies perceived as loud
  - +3 dBA – Barely Perceptible Increase
  - +10 dBA – Twice as loud
- Noise Descriptors
  - Leq – Average over a period of time
  - Ldn/CNEL – 24-hour average acknowledging nighttime sensitivity

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Table 2-5. Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock band
Jet flyover at 1,000 feet		
	100	
Gas lawnmower at 3 feet		
	90	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	80	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawnmower, 100 feet	70	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	60	
		Large business office
Quiet urban daytime	50	Dishwasher in next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime		
	30	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	20	
		Broadcast/recording studio
	10	
	0	

Source: Caltrans 2013

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NOISE ELEMENTS

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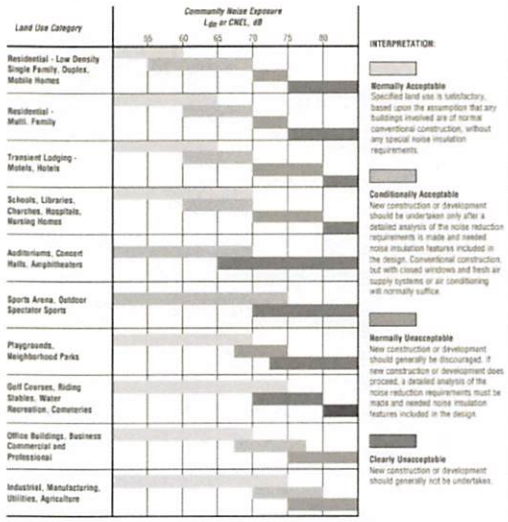
- Provide noise information to inform land use planning and decisions
- California Building Code requirements
- Strategies for reducing noise exposure
- Protect areas with acceptable noise environments
- Noise compatibility guidelines

FIGURE 2



Source: Governor's Office of Land Use & Climate Innovation 2017

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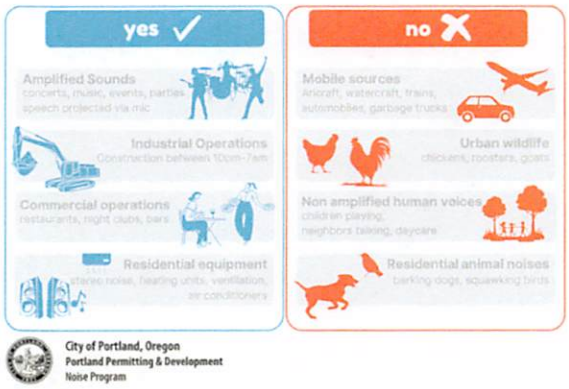
NOISE ORDINANCES

- Part of municipal code
- Enforceable and objective
- Source level limits

TABLE 36.404
SOUND LEVEL LIMITS IN DECIBELS (dBA)

ZONE	TIME	ONE-HOUR AVERAGE SOUND LEVEL LIMITS (dBA)
(1) RS, RD, RR, RMH, A70, A72, S80, S81, S87, S90, S92 and RV and RU with a density of less than 11 dwelling units per acre.	7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	50 45
(2) RRO, RC, RM, S86, V5 and RV and RU with a density of 11 or more dwelling units per acre.	7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	55 50
(3) S94, V4 and all commercial zones.	7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	60 55
(4) V1, V2 V1, V2 V1 V2 V3	7 a.m. to 7 p.m. 7 p.m. to 10 p.m. 10 p.m. to 7 a.m. 10 p.m. to 7 a.m. 7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	60 55 55 50 70 65
(5) M50, M52 and M54	Anytime	70
(6) S82, M56 and M58.	Anytime	75
(7) S88 (see subsection (c) below)		

Source: County of San Diego



City of Portland, Oregon
Portland Permitting & Development
Noise Program

6

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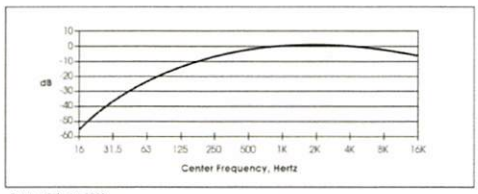
NOISE ORDINANCES

- Exceptions – Construction
- Amplified noise or signaling devices
- Nuisance noise
- Performance standards
- Adjustments

Condition	Value Correction (dBA)
Steady audible tone such as hum, whine or screech	-5
Continuous impulsive noise, such as hammering or riveting	-5
Noise occurring more than 5 but less than 15 minutes per hour	+5

Source: Town of San Anselmo Muni Code 4.7-104



Source: Caltrans 2013

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NOISE ATTENUATION

- Distance
- Site Design
- Building Design
- Physical Barriers



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CALIFORNIA ENVIRONMENTAL QUALITY ACT

- Evaluate project for consistency with Noise Element and Noise Ordinance
- Identify mitigation and alternatives
- Tool for decision makers

XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐

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DATA CENTER NOISE SOURCES AND REGULATION ENVIRONMENT

- Potential noise sources
  - Construction
  - Vehicle trips or changes to traffic pattern
  - Cooling Systems – Fans, condensing units, etc.
  - Backup Generators
  - Source list is typical of commercial development
- CEQA precedent is dBA/Noise Ordinance analysis
- Ordinance Modifications
  - Octave band analysis
    - Higher degree of technical difficulty to enforce
  - dBA Penalty

Example of Octave Band Data

Octave Band Noise Levels (dB)							Noise Levels (dB)		
125	250	500	1000	2000	4000	8000	Lc	LA	Lc-LA
81	85	93	90	101	103	104	106.5	108.0	-1.5
102	101	107	104	100	95	95	110.7	108.5	2.2
110	111	111	95	92	89	84	115.5	109.4	6.1
108	92	89	84	82	78	74	108.0	94.3	13.7

Source: Centers for Disease Control and Prevention. 2015. Comparison of Three Noise Reduction Rating Calculators for Passive and Active Hearing Protection Devices. EPHB Report No. 360-13a

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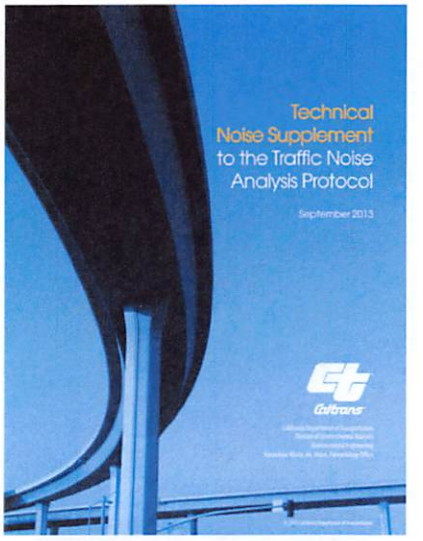
ADDITIONAL INFORMATION

- Governor's Office of Land Use and Climate Innovation's (formerly Office of Planning and Research) General Plan Guidelines
  - Appendix D: Noise Element Guidelines
  - https://lci.ca.gov/planning/general-plan/guidelines/
- California Department of Transportation's Technical Noise Supplement to the Traffic Noise Analysis Protocol
  - https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf



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THANK YOU

Who we are:
Harris & Associates, Inc.
www.WeAreHarris.com

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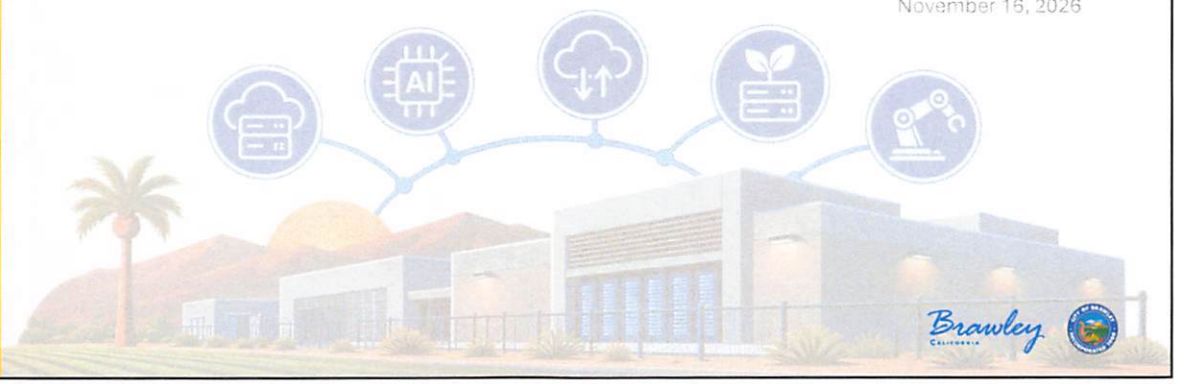
Data Centers and Emerging Technology Land Use Assessment – Work Plan

City of Brawley

Imperial County Data Center Advisory Committee

November 16, 2026



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Regulatory Context

FEDERAL CONTEXT
- AI and digital infrastructure are national priorities
- Energy demand and ratepayer impacts face growing scrutiny
- Innovation, security, and competitiveness

STATE CONTEXT (CALIFORNIA)
- Seven data center bills signed in September 2026
- New requirements address water, energy, transparency, and land use
- Greater attention to utility costs and ratepayer protections

REGIONAL CONTEXT (IMPERIAL VALLEY)
- Lithium Valley Specific Plan: geothermal energy, lithium recovery & related industries
- Regional opportunity for data centers and emerging technologies
- IID power capacity, infrastructure and large-load needs remain key considerations

LOCAL CONTEXT
- Some jurisdictions have considered moratoriums
- Community concerns about infrastructure and environmental impacts
- Brawley directed a proactive zoning assessment, not a moratorium

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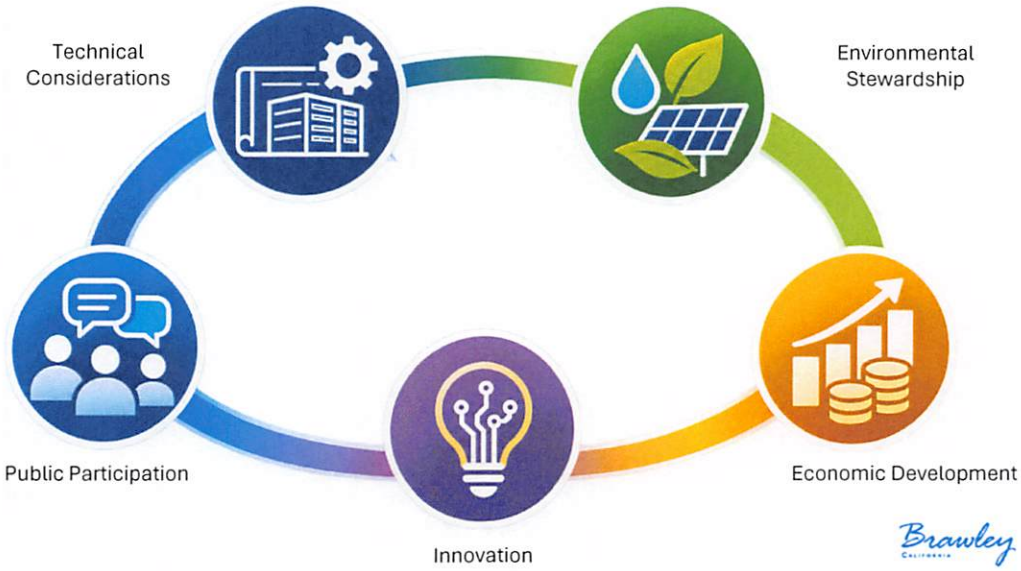
Approach



Brawley

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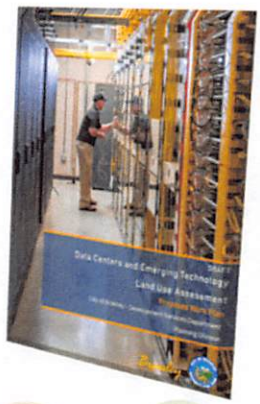
Draft Work Plan Document

Includes:

"Data Centers and Emerging Technology Land Use Assessment – Work Plan"



Overview
Purpose, scope, and key objectives

Project Phases
Structured approach from analysis to recommendations

Deliverables
Key products and outcomes at each phase

Roles & Responsibilities
City, consultants, and partner roles

Project Stakeholders
Agencies, utilities, community, industry, and regional partners

Timeline & Milestones
Target duration, key milestones, and decision points

Budget
Total cost, allocation by phase, and resource needs

Conclusion & Recommendation
Key findings and next steps (e.g., policy options or implementation)

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Phases & Deliverables

Phase 1 – Project Management

Work Plan, Project Schedule, Coordination Meetings, Meeting Minutes, Reports, Briefings.

Phase 2 – Partnerships & Procurement

Request for Proposals (RFPs), Review of Bid Packages, Executed Contracts, MOUs, Applications

Phase 3 – Existing Conditions

Land Use and Infrastructure Analysis, Surveys and Inventories, Existing Conditions Memos.

Phase 4 – Public Engagement

Public Engagement Plan, Engagement Events & Public Engagement Summary.

Phase 5 – Economic Analysis

Draft Reports, Cost-Benefit Analysis/Economic Impact Technical Memorandum, Presentations.

Brawley California

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Phases & Deliverables (cont.)

Phase 6 – Land Use Recommendations

Scenarios/alternatives, Presentations, Development Guidelines and Standards.

Phase 7 – Environmental Review

CEQA Notices, Technical Studies, Environmental Review Documents, Review of Public Comments, Filings.

Phase 8 – Stakeholder Consultation

Consultation Meetings, Presentations, Site Visits and Project Tours, Reports.

Phase 9 – Draft Ordinance(s)

Legal Reviews, Draft Ordinance Document.

Phase 10 – Approvals

Notices, Presentations, Agenda Packages, Staff Reports, Meetings.

Brawley California

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Roles & Responsibilities

Project Team
Key Roles and Responsibilities

- **City of Brawley**
  Project lead, policy direction, and final decision-making
- **Consultant Team**
  Technical analysis, studies, and recommendations
- **City Attorney**
  Legal review and policy compliance
- **Development Review Committee (DRC)**
  Interdepartmental review and technical input (Planning, Engineering, Building, Fire, Police, etc.)
- **City Manager's Office**
  Project oversight, coordination, and Council support

Project Stakeholders
Collaboration and Input

- Community & Residents
- Community-Based Organizations (CBOs)
- Business & Industry
- Utilities & Infrastructure Providers
- Regulatory & State Agencies (e.g., CPUC, CEC, CNRA)
- Academic Institutions (research and workforce)
- Imperial County & Regional Partners (e.g., Lithium Valley SP)

Data Centers & Emerging Technology Assessment

Environmental Review (CEQA)
Likely Areas of Analysis (to be confirmed)

- Aesthetics
- Air Quality & Greenhouse Gases
- Noise
- Hydrology & Water Supply
- Biological Resources
- Cultural & Tribal Resources
- Land Use & Planning
- Transportation & Circulation
- Energy & Utilities
- Hazards & Hazardous Materials
- Public Services (e.g., fire, police, EMS)
- Cumulative Impacts

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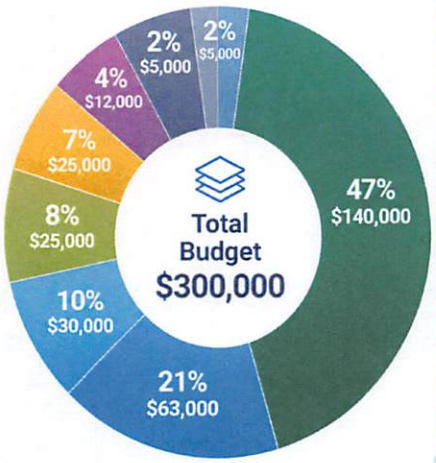
Proposed Budget

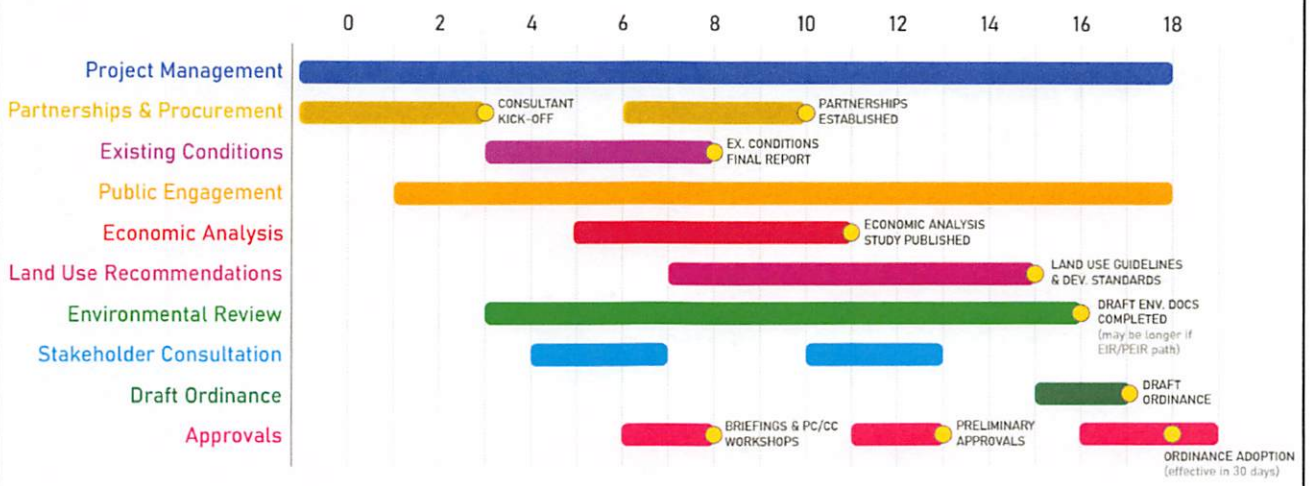


Work Plan Phase	Budget	% of Total
1. Project Management Overall coordination, schedule, and project administration	$5,000	2%
2. Partnerships & Procurement Consultant procurement and partnership development (staff-led)	$0	0%
3. Existing Conditions Baseline assessment of land use, infrastructure, and resources	$25,000	8%
4. Public Engagement Community outreach, workshops, and materials (including translation)	$63,000	21%
5. Economic Analysis Fiscal, utility, and workforce benefits and tradeoff analysis	$12,000	4%
6. Land Use Recommendations Zoning analysis, development standards, and implementation options	$20,000	7%
7. Environmental Review (CEQA) Technical studies, IS, and CEQA documentation (level to be determined)	$140,000	47%
8. Stakeholder Consultation Coordination with IID, CPUC/CEC (as needed), County, and other partners	$5,000	2%
9. Draft Ordinance(s) Preparation of zoning ordinance amendments (staff-led)	$0	0%
10. Approvals Public hearings, hearings materials, and adoption process	$30,000	10%
Total	**$300,000**	**100%**

Note: EIR path may increase budget and timeline.

8

Tentative Project Timeline



Note: Public Engagement and information-sharing occur throughout the entire project

Brawley California

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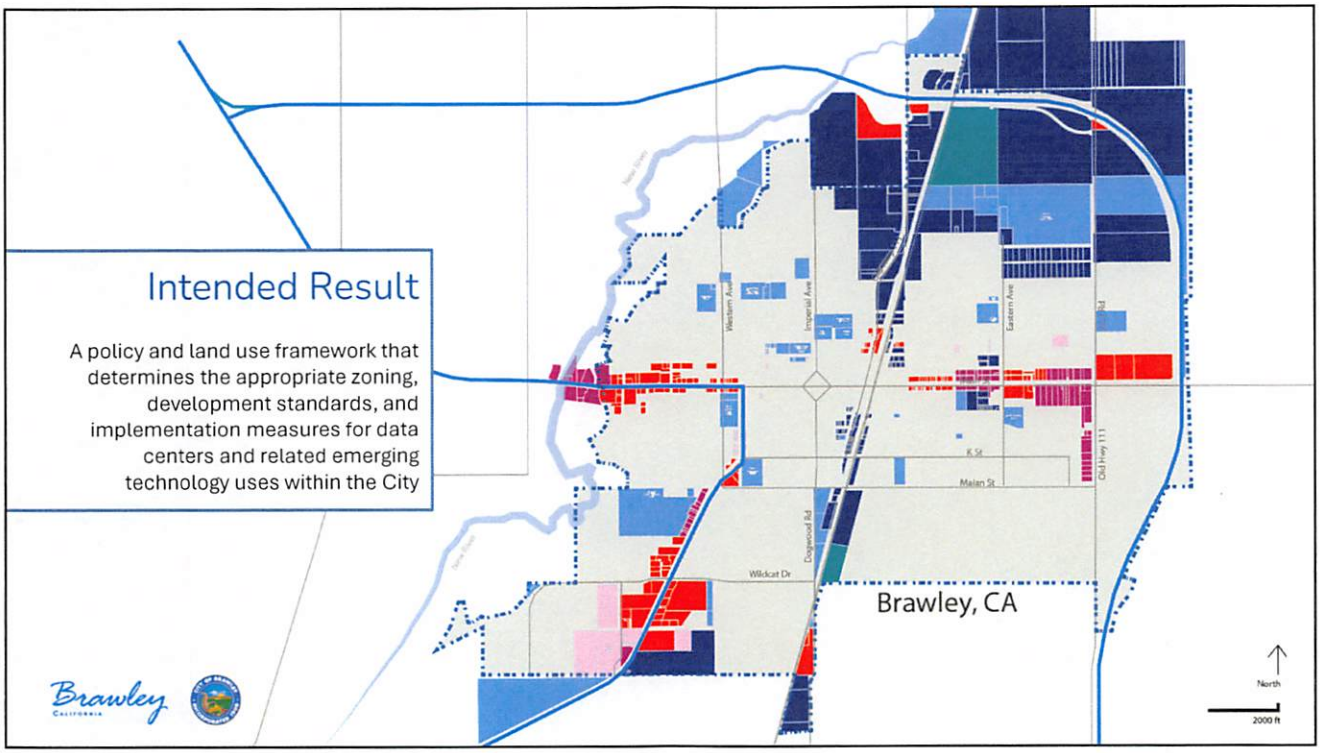
Intended Result

A policy and land use framework that determines the appropriate zoning, development standards, and implementation measures for data centers and related emerging technology uses within the City



Brawley California

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Thank you!

11

IVB



DRAFT

Data Centers and Emerging Technology Land Use Assessment

Proposed Work Plan

City of Brawley – Development Services Department

Planning Division

Brawley California

CITY OF BRAWLEY · INCORPORATED 1908 ·

Objective

City of Brawley staff drafted this document to guide upcoming efforts to amend the City's zoning ordinance to address large-scale data centers and related supporting infrastructure within the City's Sphere of Influence (SOI). To make an informed recommendation, staff needs to consult with experts, community members, and industry stakeholders and conduct technical studies and analyses to support conclusions on environmental and economic benefits.

This document will serve as a framework to guide staff through the project steps, from beginning to adoption. The document provides an overview of the background and importance, approach, statement of work, project timeline and milestones, potential deliverables, project team, procurement phases, environmental review, economic benefit analysis, public engagement, planning and land use strategy, community benefit opportunities, and approvals.

Cover Credits: USDA Photo by Lance Cheung

Source: RawPixel (CC License)

Background & Importance

High-intensity data centers have taken center stage in the land-use and infrastructure discussion in the Imperial Valley. Although the City of Brawley has not yet received a large-scale data center application at the time of this work plan's preparation, nearby cities and jurisdictions are wrestling with questions about environmental impacts and economic benefits.

In many jurisdictions, the proposed response has led to temporary moratoriums on data centers. Recent judicial rulings have expressly stated that the intent behind imposing temporary emergency ordinances limiting the development of such uses must be defensively grounded in perceived urgent risks and impacts.

The Brawley City Council held discussions between May 19 and June 16, 2026, to determine whether a moratorium would be an appropriate tool for Brawley. A moratorium would require the preparation of an emergency ordinance. After it became clear that the Brawley Zoning Ordinance does not currently allow data center development, and that allowing such uses would require a discretionary process to amend the Zoning Ordinance, subject to the California Environmental Quality Act (CEQA), the City Council decided instead to direct staff to proactively prepare such amendments to account for an assessment of the feasibility of large-scale data centers and related supporting infrastructure, in place of a moratorium.

Before engaging in the work related to the amendment, City staff consider it important to prepare a framework and detailed plan to clearly outline what will be needed to undertake and complete the effort. As described in the previous section, this plan will help City leadership make an informed decision and provide staff with direction. This document will also serve as the basis for drafting a comprehensive scope of work to recruit experts and teams to assist City staff in this endeavor.

Currently, Chapter 27 of the Brawley Municipal Code, more widely known as the Zoning Ordinance, does not include a definition of data centers, much less hyperscale or large-scale data centers as they are understood today.

When uses are not listed under the permitted or conditionally allowed columns in the various commercial and industrial districts, they are automatically treated as prohibited in all zones. A Similar Use Determination (SUD) allows the Planning Commission to determine whether an unlisted use is substantially similar to an existing by-right use and may be permitted accordingly. Similar Use Determinations are not subject to CEQA because they apply only to uses that would otherwise be permitted by right. However, for large-scale data centers, staff will not recommend they undergo an SUD, given the significant differences

between existing permitted uses and the modern conception and infrastructure demands of large-scale data centers as we understand them today.

Accordingly, staff agrees with the City Council's recommendation to amend the zoning ordinance to adequately include emerging technology uses, such as data centers, in the category that is best supported by the assessment: permitted, permitted conditionally, prohibited, etc.

Amending the Zoning Ordinance is a discretionary project subject to CEQA. The process is led by City staff, advised by the Planning Commission, and ultimately approved by the City Council. The amendment would specifically include the new uses within certain zoning districts (commercial, manufacturing, industrial, and public facilities), and, after the ordinance is adopted and takes effect, such uses would be permitted, conditionally permitted, or prohibited within those districts. Amending the Zoning Ordinance would not only affect parcels within the city limits but could also potentially affect pre-zoned areas within the Sphere of Influence (SOI) upon annexation.

Under CEQA, a project may be exempt or subject to environmental review. If subject to environmental review, the typical environmental documents include an Initial Study (IS), along with a Negative Declaration (ND), Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR)/Program Environmental Impact Report (PEIR). It is typically after the Initial Study (IS) is complete or nearing completion that the Lead Agency can best determine the appropriate level of CEQA review.

The Brawley City Council has expressed its desire to make this amendment process as transparent and clear as possible. This approach is important, as it emphasizes incorporating strategies that consider public input and information-sharing at various stages of the process, meaningfully engaging community members in shaping the plan's recommendations and keeping them informed of the analysis and findings.

Approach

City staff and consultant teams will conduct the work in an unbiased manner and prioritize the Council's recommendations to meaningfully engage the public, community-based organizations, and industry stakeholders; facilitate discussions among City leadership; lead the preparation of technical studies; and, where possible, reports for each project phase.

City staff will make balanced recommendations to the City Council based on public input received, technical work performed, existing conditions, and consideration of the proposed land use framework's compatibility with upcoming regional and local initiatives.

Project Phases & Deliverables

The following scope of work will be further refined and may differ from the scope shared with consultants during the procurement phase, as their specific responsibilities will more narrowly define their scopes. The RFP/RFQ will likely contain "tasks" that, although there may be some overlap, should not be confused with these phases. In turn, this scope provides a more general outline of the phases the project will undergo, regardless of who leads those efforts. The phases are not necessarily presented in chronological order.



Phase 1 – Project Management

City staff prepares a work plan for approval by the City Manager, in consultation with the City Council, and coordinates and reports to consultants, internal departments, and the City Manager's Office, including scheduling meetings and briefings.

Deliverables: Work Plan, Project Schedule, Coordination Meetings, Meeting Minutes, Reports, Briefings.



Phase 2 – Partnerships & Procurement

City Council and staff authorize allocation of funds and follow established contracting protocols to procure consultant services to lead engagement and technical work.

Deliverables: Request for Proposals (RFPs), Review of Bid Packages, Executed Contracts, Memorandums of Understanding, Selection Applications and Evaluation Criteria, Grant Applications.



Phase 3 – Existing Conditions

City staff and consultants evaluate Brawley's existing conditions, including, but not limited to, the various land use districts, regional infrastructure, and the City's zoning ordinance.

Deliverables: Land Use and Infrastructure Analysis, Surveys and Inventories, Existing Conditions Memos.



Phase 4 – Public Engagement

City staff and engagement partners involve residents, community-based organizations, and property owners using diverse engagement techniques. The public is kept informed of progress across all phases.

Deliverables: Public Engagement Plan, Engagement Events & Activities (such as workshops, webinars, surveys, community presentations, pop-up events), Public Engagement Summary.



Phase 5 – Economic Analysis

City staff and consultants prepare a cost-benefit analysis framework and report to assess how the proposed land use may provide community benefits and the fiscal impacts on the city and its residents.

Deliverables: Draft Reports, Cost-Benefit Analysis/Economic Impact Technical Memorandum, Presentations.



Phase 6 – Land Use Recommendations

City staff and consultants evaluate case studies, cost-benefit analysis outcomes, the Initial Study, and public engagement activities, and draft recommendations and alternatives, along with development standards, for public review.

Deliverables: Scenarios/alternatives, Presentations, Development Guidelines and Standards.



Phase 7 – Environmental Review

City staff and consultants identify preliminary potential environmental impacts, draft environmental documents, and perform technical studies.

Deliverables: CEQA Notices, Meetings (if applicable), Technical Studies, Initial Study, ND/MND/EIR/PEIR Documents, Appendices, Public Comments, Agency Responses, Filings.



Phase 8 – Stakeholder Consultation

City staff consults industry stakeholders on key concepts, definitions, and infrastructure deployment. This may require virtual consultations, in-person visits, or team participation in relevant seminars/conferences.

Deliverables: Consultation Meetings, Presentations, Site Visits and Project Tours, Reports.



Phase 9 – Draft Ordinance(s)

City staff, City Clerk, and City Attorney prepare draft ordinances for Council consideration. The ordinance may include adopting the amendment language and adopting or certifying the environmental documents.

Deliverables: Legal Reviews, Draft Ordinance Document.

Phase 10 – Approvals



City staff and consultants will coordinate staff reports, notices, and appearances before formal advisory and decision-making bodies, such as the County's Airport and Land Use Commission, the Brawley Airport Commission, the Planning Commission, and the Brawley City Council.

Deliverables: Notices, Presentations, Agenda Packages, Staff Reports, Meetings.

Roles & Responsibilities

Project Team

The project team will be primarily responsible for carrying out project activities and producing deliverables.

City of Brawley Team

The leading project team will be largely composed of technical consultants, each an expert in their field:

- City of Brawley Development Services Department
    - City staff would act as the Planning Lead, making recommendations on land use and zoning development standards. Manages other project teams and coordinates information sharing among various parties. Briefs leadership and coordinates public engagement activities

Policy Consultant Team (may include additional subconsultants)

- Public Engagement Lead
    - Public participation plan, engagement activities, reporting, and information-sharing
- Economic & Fiscal Lead
    - Economic and fiscal impact, market feasibility, community-benefit technical memorandum
- Infrastructure Lead:
    - Engineering feasibility, utilities, water, and energy requirements

Environmental Consultant Team (may include additional subconsultants)

- Environmental Lead
    - Lead the preparation of the technical studies, draft the environmental documents, and may conduct noticing and public meetings with the support of other teams
- Air Quality
    - Air quality and greenhouse gas emissions technical study. May include a health risk assessment.
- Aesthetics
    - May assess the visual and scenic character of identified impacts.
- Biology

  - Biological surveys
- Cultural/Tribal
  - Prepares Tribal Cultural Resources. May assist with SB 18/AB 52 outreach.
- Noise
  - Conducts noise and acoustics studies
- Transportation
  - May conduct transportation studies, including but not limited to traffic, VMT, etc.
- Energy/Utilities
  - Technical studies of energy consumption, fiber deployment, and other utilities.
- Water/Hydrology
  - Water and hydrology studies
- Hazards
  - Wildfire, seismic, and other related hazards
- Other technical studies as required

Community Partners

- Under the supervision of City staff and the Public Engagement Lead, the City may select one or more community-based organizations to participate in the community engagement and information-sharing efforts, thus leveraging connections with the local communities and enhancing opportunities to better reach underrepresented groups.
- If enough interest is perceived, the City and Public Engagement Lead may put in place a competitive process to select the partner(s). Ideally, their participation and efforts may be paid, and the relationship may be formalized through a Memorandum of Understanding (MOU).
- Upon conferring with City staff, they will be allowed to plan and host public meetings on behalf of the City, promote surveys, and help disseminate information about the project.

Other Partnerships

- The City may partner with non-profit institutes to provide staff with technical assistance in project funding, community involvement, and/or policy implementation.
- The City may also consider student partnerships with academic institutions, identifying opportunities for students to participate in various project phases.

Others

Formal Advisory & Decision-making

- Development Review Committee (DRC)
  - Fire, Public Works & Police Departments provide input from the City staff perspective
- City Manager's Office
  - Provide overall administrative guidance and direction of the project
- City Attorney's Office / Paralegal Consultant
  - Legal review of some deliverables to ensure proper language and legal perspective on policy and implementation strategies
- County of Imperial Airport Land Use Commission
  - Provide recommendations on the compatibility of uses with airport-adjacent uses to address flight risks
- Brawley Airport Commission
  - Recommendations regarding potential injunction of airport activities and emerging industrial uses
- Planning Commission
  - Provide recommendations to the City Council on land use matters
- City Council
  - Considers ordinance amendments for approval

Source: Hanwha Data Centers (CC License)



Project Stakeholders

Consultants will support the City in better determining the full range of project stakeholders. However, a preliminary framework could include, but not be limited to, the following:

The Brawley and Imperial Valley Community

- Brawley Residents
- Business owners
- Agricultural property owners
- Industrial operators
- Non-profit and Academic Institutions
- Community-based Organizations
    - Advocacy Groups
    - Environmental Coalitions
- Local Trade Unions
- Regional Building Associations
- Others

Technical Agency Consultation

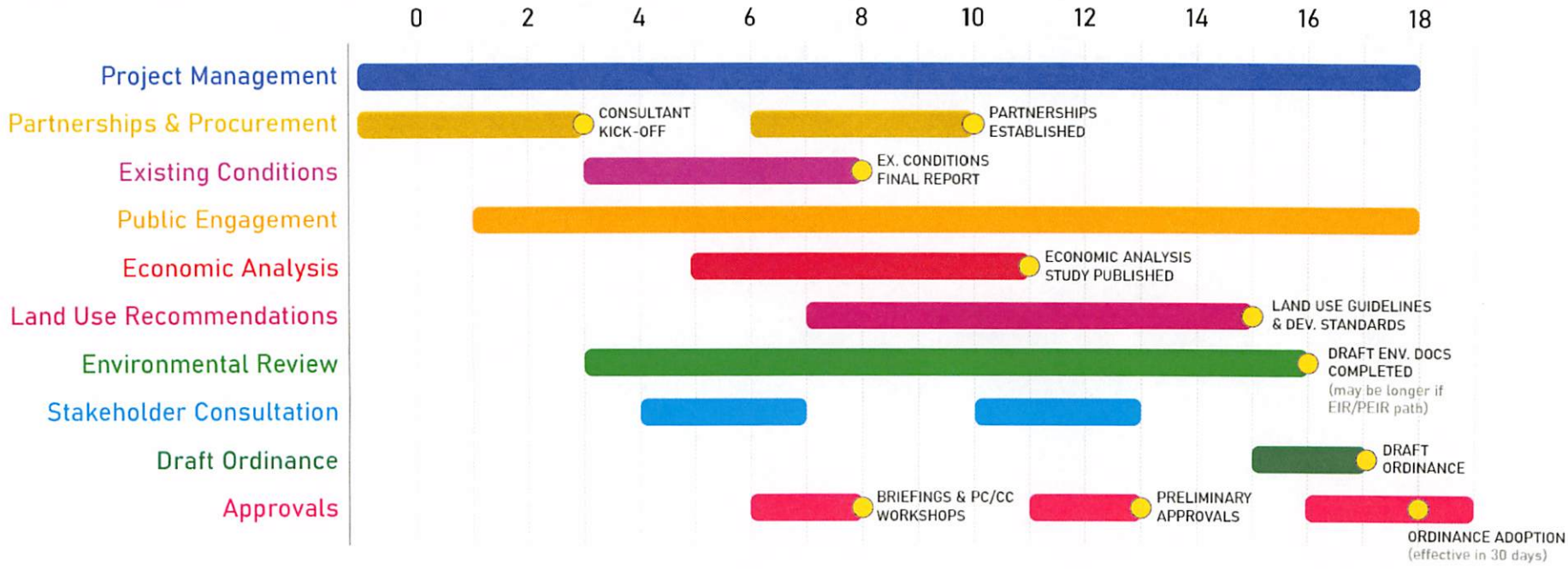
Where appropriate, City staff may consult agencies and groups whose mission might be relevant to the effort, which may include but not be limited to the following:

- Imperial County Local Agency Formation Commission staff
- Imperial Irrigation District staff
- County of Imperial staff
- Municipal staff from nearby cities
- Imperial County Data Center Committee
- California Energy Commission staff
- California Public Utilities Commission staff
- U.S. Department of Energy

Industry Stakeholders

- Chambers of Commerce
- Economic Development Corporations
- Emerging Technology / Data Center Developers and Operators
- Emerging Technology / Data Center Associations
- Local Internet Service & Fiber Optic Providers

Project Timeline and Milestones



Notes

- The Partnerships & Procurement phase accounts for community-based organization partnerships, in addition to consultant procurement.
- The Environmental Review phase is considered a critical path along with the Draft Ordinance and Approvals phases, and it currently anticipates preparing an Initial Study after the consultant kick-off meeting. For planning purposes, the proposed timeline is designed with a Mitigated Negative Declaration path. A determination to prepare an EIR/PEIR will likely extend the phase duration and approvals timeline.
- The Public Engagement phase anticipates continuous community engagement throughout the duration of the project.
- Early approvals may include DRC approvals and appearances before airport commissions. Final approvals entail action items from the Brawley Planning Commission and City Council. This phase also accounts for early engagements with the Council or Council Committees.

Budget, Fiscal Impact & Alternatives

With these assumptions in mind, the staff has prepared a preliminary budget that accounts for all activities within each phase. City staff overhead is not factored in as project expenses. However, staff participation in various activities and reimbursements, such as project tours, conference travel expenses, and webinars unique to this project, may be considered.

It is important to note that the Partnerships & Procurement phase currently leaves the door open to engage non-profit organizations to support project funding opportunities, such as grants, that could reduce the fiscal impact.

The environmental review expenses may increase by 40-75% if it is determined that an Environmental Impact Report or Program Environmental Impact Report must be prepared.

Preliminary Budget by Phase

Phase	Primary Cost Components	Budget
1. Project Management	Consultant coordination, meetings, schedule/reporting; City staff excluded	**$5,000**
2. Partnerships & Procurement	RFP/RFQ support, partnership development, MOUs, grant support	**$0**
3. Existing Conditions	Planning/regulatory research, case studies, GIS, infrastructure baseline, draft memos/report	**$25,000**
4. Public Engagement	Engagement lead, workshops, surveys, materials, translation, CBO stipends/support	**$63,000**
5. Economic Analysis	Fiscal/economic impact, cost-benefit, market feasibility, community-benefit opportunities	**$12,000**
6. Land Use Recommendations	Alternatives, land-use analysis, development standards/guidelines, presentations	**$20,000**
7. Environmental Review	CEQA prime, IS, technical studies, ND/MND assumption, notices, responses, documentation	**$140,000**
8. Stakeholder Consultation	Industry/agency consultation, site visits and project tours	**$5,000**

9. Draft Ordinance(s)	Planning consultant support, ordinance drafting, graphics/maps, legal coordination	**$0**
10. Approvals	Consultant attendance, presentations, hearing support, final revisions	**$30,000**
	Recommended Planning-Level Authorization	**$300,000**

Preliminary Budget by Consultant / Partnership

Consultant / Partner	Anticipated Role	Budget
Public Engagement Lead	Engagement strategy, workshops, surveys, outreach, reporting	**$50,000**
Economic & Fiscal Consultant	Economic/fiscal impact, cost-benefit, market feasibility, community benefits	**$15,000**
Infrastructure Lead	Engineering feasibility, energy, water, utilities, and infrastructure requirements	**$50,000**
Environmental Prime + CEQA Technical Subs	IS, CEQA documentation, technical studies, notices, responses, hearings	**$150,000**
CBO Partner(s)	Community outreach, event participation/hosting, survey promotion, underrepresented-community outreach	**$25,000**
Nonprofit / Institutional Partners	Pro bono technical assistance, grants, policy research, specialized expertise	**$0**
Project Management / Site Visits / Misc. Expenses	Registration, travel, project tours, specialized project expenses	**$10,000**
	Total Authorization	**$300,000**

The outline safeguards the desired approach, meaningful community engagement, and transparency, which may help mitigate the already controversial aspect of this initiative and help instill trust in the decision-making process. Staff also believe this proposed work plan provides appropriate technical and administrative support and balances the multiple other

priorities that Development Services staff must address, such as current planning and other long-range planning projects of high significance to the City.

This section also discusses potential project execution alternatives, including scenarios with reduced budget and reduced scope. A reduced-timeline scenario that significantly compresses or bypasses the development of environmental documents is not evaluated, as it would likely result in a less adequate environmental review and is therefore strongly discouraged.

Alternative #1 – Reduced consultant support

This alternative is characterized primarily by deferring most analysis and engagement responsibilities to City staff. To effectively balance multiple tasks and other high-significance City projects, the timeline will likely be extended to avoid resorting to new full-time hires. This approach also significantly reduces the scope of the Public Engagement Lead, potentially leading staff to absorb those responsibilities.

The implementation of this alternative could reduce the project budget by approximately 33% or $100,000.

Alternative #2 – Deferred project plan

This alternative involves identifying a future start date for the project until external or private investment can fund the effort, potentially through an applicant-funded reimbursement or another funding mechanism. The benefit of this approach is that the scope may remain largely the same but could be funded by private investment, with a significantly reduced or no fiscal impact on the City. The pitfall this alternative may face is the optics of the approach, which may be perceived less as a proactive City effort and more as a developer-led initiative, in partnership with the City, to make specific projects work.

This alternative would also result in an indefinite project timeline. Given the rapidly evolving nature of data center and emerging technology development in the Imperial Valley, regional infrastructure, market conditions, industry interest, and the overall development window may change substantially before funding becomes available. As a result, portions of the assessment may need to be reconsidered or updated when the project ultimately proceeds.

The implementation of this alternative could shift most or all of the project budget to a third party, resulting in a significantly reduced or potentially no direct fiscal impact on the City.

Conclusion & Recommendation

All things considered, staff believes the proposed work plan, including its project phases, approach, team composition, timeline, and associated budget, represents an appropriate framework for completing the Data Centers and Emerging Technology Land Use Assessment. The proposed phases provide for meaningful community and stakeholder engagement opportunities, appropriate environmental and technical analyses, consideration of economic and infrastructure implications, and the development of land-use recommendations before proceeding to ordinance preparation and formal approvals. The multidisciplinary consultant and partnership structure is similarly intended to provide the specialized expertise necessary to evaluate a complex and evolving land use from diverse perspectives, while supplementing limited staff capacity and allowing Development Services staff to continue advancing other high-priority current and long-range planning efforts. Collectively, this approach supports the City Council's direction for transparency and meaningful engagement and provides a more objective and balanced basis for decision-making rather than beginning the process with a predetermined policy outcome.

While the alternatives presented could reduce the City's immediate project costs, each introduces corresponding tradeoffs in staff capacity, analytical depth, public engagement, project scope, or schedule. Staff therefore considers the proposed approach, including the relatively compressed project timeline and a $300,000 planning-level authorization, to strike an adequate balance among fiscal responsibility, technical rigor, transparency, staff resources, and timely decision-making. Maintaining the proposed level of consultant support also allows multiple phases to proceed concurrently, which may be particularly important if the City Council ultimately determines that accommodating these uses is in Brawley's interest and wishes to take advantage of the current development window. Conversely, the recommended approach does not presume that data centers or other emerging technology uses should ultimately be permitted; rather, it provides the City with the expertise, analysis, public input, and range of perspectives necessary to reach that determination through a fair, transparent, and informed process.

V. A. for record.

Cynthia Medina

From: Jake Tison <jaketison@cox.net>
Sent: Tuesday, November 10, 2026 1:09 PM
To: Cynthia Medina; kristiansalgadodcac@gmail.com
Subject: Request for a complete public inventory of data center projects and formal acknowledgment by the Advisory Committee

CAUTION: This email originated outside our organization; please use caution.

Dear Clerk of the Board and Data Center Advisory Committee Chairwoman:

Hello Ms. Medina and Ms. Salgado,

I am requesting a complete, current inventory of all data center projects known to Imperial County and that this inventory be formally presented to, acknowledged by, and incorporated into the public record and deliberations of the Data Center Advisory Committee.

The County's October 6, 2026 Board agenda packet, Item 19, identifies four projects on PDF page 6:

1. Imperial Data Center — Imperial Valley Computer Manufacturing LLC.
2. Tomcat Development LLC data center.
3. Mesquite Lake Data Center Project — William Bradley Revocable Trust.
4. YK America Green Century Dev Data Center.

Immediately below that list, the County acknowledges **four additional proposed data center facilities based on information provided by the Imperial Irrigation District**, while stating that no formal applications or project submissions had yet been received for those facilities.

The County therefore acknowledged eight proposals at that time. The public deserves an updated accounting of their identities, locations, status and potential combined demands on our communities.

I respectfully request the following:

1. A complete, consolidated inventory.
Include all known data center inquiries, concepts, preapplications, similarity-of-use requests, pending applications, approved projects, facilities under construction and operating facilities. Identify withdrawn, inactive or superseded proposals separately so that the public can distinguish current projects from historical proposals and avoid duplicate counting.

2. Identification of the four IID-reported proposals.
Coordinate with IID and Planning and Development Services to identify the four additional facilities referenced in the October 6 packet. Include any additional proposals received or identified since that date.

3. Basic information for every project.
For each entry, provide the project name; applicant and property owner; proposed operator, if known; address and assessor's parcel numbers; permitting jurisdiction; application or case numbers; current status; and relevant submission or decision dates.

Also include available information about acreage, building size, full-buildout electrical demand, water source and consumption, cooling system, backup generation, battery storage, environmental review and proximity to homes and schools. Clearly mark information that has not been submitted or verified.

Identify known proposals within incorporated cities or on tribal lands separately, with the responsible jurisdiction clearly stated.

4. Formal presentation to the Advisory Committee.
Place the inventory on the next available properly noticed committee agenda for a staff presentation, committee discussion and public comment. Distribute it to every committee member and publish it with the meeting materials. Please ensure the minutes document the committee's receipt and consideration of the inventory.

5. Identification of previous committee review.
For each project already presented to the committee, identify the meeting date and corresponding agenda materials. For projects not yet presented, state when that presentation will occur.

6. Continuing public updates.
Maintain the inventory on the County's data center webpage, display its revision date, and provide updates to the committee when projects are added or their status materially changes.

The committee's recommendations concerning location, public health, water, electricity, emergency response and cumulative impacts should be informed by the full project pipeline. Residents should not have to reconstruct that pipeline from scattered agenda packets and references to unnamed facilities.

Please enter this letter into the committee's public correspondence record and circulate it to all members. I request a written response within ten business days identifying the staff responsible for compiling the inventory, the anticipated publication date, and the meeting at which it will be presented.

Sincerely,

Jake Tison
Imperial County resident

Reference: October 6, 2026 Board of Supervisors agenda, Item 19, PDF page 6: