



November 17, 2025

Imperial County Planning & Development Services  
801 Main Street  
El Centro, CA 92243

**RE: COMMENT LETTER – MERG00191 2304 CLARK ROAD PROJECT**

Dear Imperial County Planning and Development Services,

The Community Development Department for the City of Imperial has reviewed the proposed Lot Merger MERG00191 for the future development of a data center located near the intersection of Clark Road and Aten Road. The City has also reviewed the filed Notice of Exemption for Project Title: Grading Permit BP#63316 (Initial Study #25-0041) filed November 6, 2025. The City was not provided a copy of the underlying Grading Permit. The City did not review any backup associated with the Notice of Exemption.

City of Imperial's Planner, Yvonne Cordero, spoke to Imperial County Planning & Development Services staff on November 6, 2025. She was assured that the County was only collecting comments from agencies to assist with drafting conditions for the Lot Merger. Staff also confirmed that the County would hold a public hearing on this matter at a future date and provide written notice to landowners within 1000 feet.

The Notice of Exemption and the Lot Merger documents reference a zone change from agriculture to industrial, a full Data Center Complex that consists of 74.33 acres and an electrical substation, an on-site Battery Energy Storage System and natural gas generators. There is no reference to the details of this project (examples such as building size, and potential energy and water use). The comments the City of Imperial would provide on the entire project differ from the comments on just a Lot Merger. The City looks forward to receiving a complete project description, outline of the project and the ability to comment on the full project at the aforementioned public hearing.

The City welcomes and actively promotes development such as this data center. For example, the City is working with this applicant on providing reclaimed water from the City of Imperial facilities for what we believe to be the data center proposed for this site. But, a critical element of any development is involvement of our citizens in the approval process. The City prioritizes

feedback from our citizens when development projects are located within our City or Sphere of Influence. This project is located immediately adjacent to City of Imperial homes.

We formally request a clear outline of the project, an understanding of whether there will be a publicly noticed public hearing in front of the County of Imperial Environmental Evaluation Committee, the County of Imperial Planning Commission, the County of Imperial Airport Land Use Commission and/or the Planning Director or Board of Supervisors. We request that we be provided project details and opportunity to comment on the full project. Further, it is essential that the citizens in the immediate vicinity of Data Center Project be given an opportunity to comment.

Without the benefit of full project details or backup, the City provides the following comments:

### **City Services**

The project site is located directly adjacent to the City of Imperial's boundary and within close proximity to existing and planned urban development. Although the project is located in the unincorporated area, the scale and type of use may have operational, infrastructure, and public safety interactions with City services. For this reason, the City requests ongoing coordination throughout the review process.

### **Traffic and Circulation**

Due to the project's size and its reliance on Clark Road, Aten Road, and nearby regional routes, the City recommends that the County require a traffic study evaluating construction traffic, long-term operational traffic, and heavy vehicle turning movements. The study should evaluate any needed roadway improvements to ensure that project-related traffic does not adversely impact the City's roadway system near its boundaries.

### **Environmental Review**

The City requests that Imperial County include the City as a commenting agency and provide copies of all CEQA documents, including the exemptions, initial study, draft environmental impact report, traffic analysis, water supply analysis, and any technical studies associated with the project. Given the project's proximity to the City and the proposed industrial uses, the City requests early review of CEQA documents, including any cumulative impact analysis.

### **Imperial County Airport Land Use Commission Review**

Due to the location, the City requests information on when the Airport Land Use Commission will review this project.

### **Imperial County LAFCO Review**

Although the applicant has indicated that annexation is not planned at this time, the City recommends that the County require future coordination with LAFCO should any City service

connections, agreements, or infrastructure extensions be requested. Due to the project's proximity to the City boundary, long-term service coordination may be necessary.

The City of Imperial appreciates the opportunity to provide comments. We request that the County keep the City informed of all future project milestones, technical study releases, and public hearings. Please feel free to contact the Community Development Department should you need clarification or wish to coordinate further.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'M' followed by a horizontal line and a flourish.

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Othon Mora, MCM, CBO  
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