County of San Diego
Planning & Development Services

Director's Determination

Date: October 16, 2026

To: PDS Planning/Counter Staff

From: Vince Nicoletti, Director

Planning & Development Services

Director's Zoning Ordinance Interpretation: Regarding an acknowledgement that data centers meet the definition of a Major Impact Service and Utility per the Zoning Ordinance.

Background

On January 14, 2026 (4), the San Diego County Board of Supervisors (Board) directed staff to study potential impacts of large-scale data centers in the unincorporated areas and explore options to address those impacts. Staff delivered a memorandum (the Report Back on AI Data Centers) to the Board on July 14, 2026. As described in the memorandum, Planning & Development Services staff are memorializing current County land use practices for data centers through this Director's Determination. This will ensure clarity in the County's interpretation of permit requirements for data center projects in the County's unincorporated areas.

Currently, the County does not have specific definitions or development standards in place to guide the review process for data centers. In the absence of such regulations, these types of projects are processed following the procedures for the nearest comparable land use type in the Zoning Ordinance. For data centers, this is the Major Impact Services and Utilities use type.

At a high level, data centers are facilities that provide information technology (IT) services by using large computer systems that process, store, manage, and transmit data. These computer systems typically consist of servers, data storage devices, and network equipment – each composed of several subcomponents that are physically connected to a broader network of electrical and telecommunications infrastructure that may also be

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located on the same site. This core technology is common across all data centers, regardless of their size.

Existing data storage, processing, and management systems in the San Diego region have typically included smaller facilities co-located with telecommunications infrastructure or accessory uses such as computer rooms/floors or server closets located in the same building or site as an office, bank, or other primary use. Such facilities that support on-site or local IT needs for another primary use are not addressed by this determination.

The growing number of connected devices and use of cloud computing services has increased the demand for data processing and storage, leading to the emergence of large-scale data centers that primarily serve off-site data users as a new type of primary use. The significantly larger footprint and resource demand corresponds to a greater potential to impact land use, infrastructure, and the environmental landscape of the unincorporated areas of San Diego County, making it appropriate to categorize such large-scale data centers as a Major Impact Services and Utilities. For the purposes of this determination, "data centers" refers to large-scale data centers.

Relevant Sections of the Zoning Ordinance

Section 1008, Interpretation and Application of the Zoning Ordinance, authorizes the Director of Planning & Development Services (Director) to interpret the content or application of the Zoning Ordinance if ambiguity arises. It is the duty of the Director to ascertain all pertinent facts and render a decision on the interpretation. It is the intent of this Director's Determination to provide guidance as to the acceptance of data centers as Major Impact Services and Utilities per the Zoning Ordinance.

Pursuant to Section 1350 of the Zoning Ordinance, Major Impact Services and Utilities are a Civic Use Type that refers to public or private services and utilities which have substantial impact. Such uses may be conditionally permitted in any zone when the public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community wide interest. Typical places or uses are schools, sanitary landfills, public and private airports, public park/playground/ recreational areas (other than public passive park/recreational areas), hospitals, psychiatric facilities, cemeteries, nursing homes, detention and correction institutions, trade schools (with outdoor training facilities) or security, law enforcement, military, paramilitary type training facilities, or field medical training uses.

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In the absence of specific definitions or development standards to guide the review process for data centers, large-scale data centers shall be permitted under the provisions of the Major Impact Services and Utilities use type of the Zoning Ordinance. In reviewing the existing definition of Major Impact Services and Utilities in the Zoning Ordinance (provided above), data centers can be considered a public or private service or utility with a substantial impact due to their provision of IT services supporting other on- or off-site uses and inclusion of significant power and telecommunications infrastructure as well as other operational systems and equipment.

Per the existing definition, data centers may be conditionally permitted when the public interest supersedes the usual limitations placed on land use and the usual restraints of zoning for necessary location and community wide interest. The provisions of Section 7350 et seq., Use Permit Procedures, shall apply. As directed by the Board on September 28, 2022 (7), staff will continue to encourage the use of Community Benefits Agreements (CBAs) in processing Major Impact Services and Utilities, as outlined in the Voluntary CBA Guidelines.

Under Section 21080 of the California Public Resources Code, projects that are purely ministerial are exempt from the California Environmental Quality Act (CEQA). Since this determination involves interpreting a use classification, it falls into that category and is therefore exempt from CEQA.

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