

April 27, 2026

**PROJECT TANGO
JUSTIFICATION STATEMENT
FOR A DEVELOPMENT ORDER AMENDMENT TO AMEND THE APPROVED
MASTER PLAN TO INCREASE THE MAXIMUM FLOOR AREA AND INTENSITY IN
ACCORDANCE WITH THE LAND USE AND ZONING APPROVALS
TO FACILITATE THE BUILDOUT OF THE MUPD WITH BY RIGHT EDC MUPD USES**

Existing Approved Development Order History:

The approximately 202 acre subject property (the "Property") is located at the western edge of development of Palm Beach County ("County") along State Road 80 with the immediately western parcel being developed with the Florida Power & Light West County Energy Center electrical power facility. The Property is currently approved for development known as the Central Park Commerce Center MUPD.

The Palm Beach County Board of County Commissioners ("Board") approved the Central Park Commerce Center MUPD in 2016 with the adoption of concurrent comprehensive plan future land use land use map and text amendments, along with re-zoning to MUPD, and approving a master plan for the development of the Property. These Board approvals have subsequently been amended over time.

Based on the prior Board approvals, the Property can currently be developed with 2,020,000 sf of Economic Development Center uses, including data and information processing, and warehouse with ancillary office space. From the very beginning, the County approvals have provided for the same approved by right uses currently proposed for the Property including large scale data center facilities, warehouse, ancillary office space, and other economic development center uses as set forth in the comprehensive plan.

When the original application was submitted in 2015, the Zoning Director, in accordance with the authority granted by the Unified Land Development Code ("ULDC"), determined that the proposed data center was a Data and Information Processing use as set forth in

the ULDC. The ULDC defines Data and Information Processing as “an establishment for business offices of an industrial nature, including corporate centers, associated with uses such as: Manufacturing and Processing plants or similar industrial complexes; mass/bulk mail processing; and telemarketing centers. The use is often integrated into campus-style development and not frequented by the general public. This term does not include such uses as: Business or Professional Offices; computer-related Retail Sales establishments; and Personal Services and Medical or Dental Offices.” This determination went unchallenged and was ultimately approved by the Board, a finding that also went unchallenged. This definition remains the same and is applicable to the subject application.

Land Use Approvals

The comprehensive plan designation was initially approved in 2016 and has subsequently been amended three times. Ordinance Number 2016-026 changed the land use of approximately 138.31 acres of the Property from RR-10 to EDC, along with text amendments to allow the Economic Development (EDC) land use designation in the Glades Area Protection Overlay (GAPO) and revisions to the policies associated with the incorporation of that land within a Limited Urban Services Area (LUSA).

Ordinance Number 2016-026 included several requirements pertaining to the future development of the MUPD to account for traffic implications and the amendment provided for a “traffic equivalency”, which permits any EDC uses with the equivalent traffic generation of 491,749 sf of light industrial uses and 2,786,577 sf of warehouse uses.

Ordinance Number 2016-026 also required that if a minimum of 200,000 square feet of uses which make use of the unique attributes of the site, such as adjacency to Florida Power & Light West County Energy Facility, uninterrupted and redundant power source, the site elevation, and/or fiber optic availability, did not commence prior to June 30, 2019, County staff was required bring back to the Board consideration of the County initiating an amendment to change the future land use designation.

Ordinance Number 2018-012 modified the conditions pertaining to the minimum data center development requirements and extended the commencement deadline date to June 30th, 2022.

Ordinance Number 2025-003 changed the land use designation for an additional 64.46 acres of the Property from RR-10 to EDC. This Ordinance also approved an amendment to Policies 1.8-c and 3.3-a.5, and to Service Area Maps L.U. 1.1 and 2.1 to reflect the expansion of the Limited Urban Service Area (LUSA) for the land subject of the future land use map amendment. This amended the boundary of the Central Park Commerce Center, adding 64.46 acres but without any additional development rights; the total property maintained the maximum available traffic equivalency of 491,749 sf of light industrial uses and 2,786,577sf of warehouse uses.

The following is a summary of the previous comprehensive plan related approvals for Central Park Commerce Center by application number and date.

Land Use Ordinance History		
Ordinance	Request	Approval Date
ORD 2016-026	Text Changes to establish EDC uses in the GAPO and establish maximum build out of the EDC uses with the equivalent traffic generation of 491,749 sf of light industrial uses and 2,786,577 sf of warehouse uses	04/27/16
ORD 2018-012	Extended the MUPD commencement deadline to June 30 th , 2022.	07/23/18
ORD 2025-003	Add 64.46 acres of the Property from RR-10 to EDC	01/30/25

Zoning/Master Plan Approvals

October 11th, 2016, a revised master plan was approved with 2,020,000 sf of EDC uses was approved.

July 12th, 2017, a revised master plan was approved with 2,020,000 sf of EDC uses and a final site plan was approved with 1,200,000 sf of Data and Information Processing, 120,000 sf of Light Ind, 680,000 sf of Warehouse and 20,000 sf of Office fulfilling the land use ordinance condition requirements.

February 4th, 2022, a revised master plan was approved with 2,020,000 sf of EDC uses and a final site plan was approved with 206,000 sf of Data Information Processing and 1,814,000sf of Warehouse

In addition to the Board approved zoning ordinances and resolutions, the County Zoning Commission approved variances related to parking on the Property, most recently by ZR -2025-014. The most recent variance approved a parking ratio of 1 parking space / 2000 sf of Data and Information Processing use for the entire 202 acre MUPD.

The following is a summary of the previous zoning and variance approvals for Central Park Commerce Center by application number and date.

Zoning and Site Plan History				
Application No.	Request	Action	Date	Reso. No.
ZV/PDD-2015-02166	Rezone from Special Agriculture (SA) to the MUPD Zoning District and allow Alternative Landscape Buffer.	Approved	04/28/16	R-2016-0551
ZV/PDD-2015-02166	Type II Variance to allow an increase in the number of freestanding structures in a MUPD, modify the parking calculation for Data Information and Processing Use.	Approved	04/07/16	ZR-2016-027
DROE-2016-01051	Finalize FMP and FSP	Approved	10/11/16	N.A.
ZV-2016-01648	Type II Variance to eliminate the required parking spaces on the rear and side of the building.	Approved	04/06/17	ZR-2017-009
ZV-2016-01648	Type II Variance to eliminate the interconnectivity between uses within and adjacent to the MUPD.	Approved	04/06/17	ZR-2017-009
ZV-2016-01648	Type II Variance to allow a reduction in the number of interior trees; eliminate the interconnectivity between uses in and adjacent to the project; and a reduction in the required parking at the side or rear of the building.	Approved	04/06/17	ZR-2017-009
DRO 2016-1650	FMP Exhibit 3 and FSP Exhibit 4 with 1,200,000 sf of Data and Information Processing, 120,000 sf of Light Ind, 680,000 sf of Warehouse and 20,000 sf of Office	Approved	07/12/17	N.A.
DRO2/DRO-2021-1360	FMP Exhibit 15 & FSP Exhibit 17 with 206,000 sf of Data Information Processing and 1,814,000sf of Warehouse	Approved	02/04/22	N.A.
PDD/DOA-2024-0309	Rezone from Special Agriculture (SA) to the MUPD Zoning District on 64.46 acres.	Approved	01/30/25	R-2025-0122
PDD/DOA-2024-0309	A DOA to modify the overall MUPD Master Plan to add 64.46 acres of land area and to modify	Approved	01/30/25	R-2025-0123

	the Conditions of Approval on 202.67 acres.			
DROE-2025-0334	Amend FMP Exhibit 19 to add 64.46 acres to the MUPD maintaining existing concurrency	Approved	04/24/25	N.A.
ZV/2025-1602	Variance to establish a parking ratio 1space / 2000 sf for Data and Information Processing use for the entire 202 acre MUPD	Approved	12/04/25	ZR 2025-014

As noted above, the Property is currently approved for development of 2,020,000 sf of permitted by right MUPD EDC uses as set forth in the ULDC. These MUPD EDC by right uses include vocational intuitions, government service, data and information processing, manufacturing and processing, medical or dental laboratory, multi-media production, research and devolvment, warehouse, and wholesaling. The Property is currently approved and vested for 2,020,000 sf of EDC use including 206,000 sf of Data and Information Processing use and 1,814,000 sf of Warehouse use inclusive of 31,000 sf of ancillary office space.

Platting

Two Plats have been approved and recorded that allow for building permits to be issued for the existing MUPD approval.

The Central Park Commerce Center MUPD Plat was approved and recorded in Plat Book 135/101. The PBA Hydro Storage Water Conservation and Energy Center Plat was recorded in Plat Book 135/109. Both Plats were recorded on February 21, 2023.

Pursuant to the Central Park Commerce Center MUPD Plat, a deed was recorded in ORB 34162/1619 transferring ownership of the land area associated with the approved 1,200,000 sf warehouse use, consisting of approximately 60 acres. This parcel is not affected by this application.

Florida Power & Light Coordination

From the beginning of the project in 2015, the property owner has been working closely with Florida Power & Light ("FPL") in effort to ensure the Data and Information Processing Use would have the required power without detriment to existing and future FPL customers. In May of 2019, as approved by the County pursuant to AI 2019-001, the owner temporarily repurposed a significant portion of the Property to serve as temporary laydown yard for a statewide infrastructure resiliency project intended to upgrade the entire electrical grid from the Florida Keys to the Florida/Georgia line. This seven-year project enhanced the statewide grid reliability for all customers and was a key factor needed to establish the power delivery resilience necessary for a Data and Information Processing use of the Property and as required to meet the conditions of the land use ordinances discussed above.

The coordination with FPL and the County on this seven-year grid resiliency project was part of a long-term investment by the applicant to meet the requirements of the comprehensive plan and ready the Property for the approved uses, including those sought by the present application. The applicant also continued to invest in other site upgrades, including an expensive and complex power transmission system, and power use agreements with FPL that are necessary for the approved uses, including those sought by the present application. Overall, more than \$20,000,000 has been spent based on the County approvals and the ability to develop Data and Information Processing and Warehouse uses on the Property.

The change in allocation of the warehouse data and information processing use in the current proposal, which are both by right MUPD EDC uses, will not have an impact or change the parking demand as both uses have the same required parking ratio of 1 space per 2000 sf of use.

The data and information processing use will house computer servers and other equipment that processes data for commercial use and consumption, with a limited number of employees processing data and no visitors or onsite interactions from the general public, resulting in a much lower parking demand than ULDC requires.

Property Location

The Central Park Commerce Center MUPD is located on the north side of SR80 approximately 3.8 miles west of Seminole Pratt Whitney Road. Other than the Tri-City area of the County (Pahokee, Belle Glades and South Bay) which are approximately 16 miles west of the Property, and the FPL West County Energy Center, it is the western edge of the development of the County. Between the FPL West County Energy Center and the Tri-City Area of the County are agricultural production lands.

The chart below identifies the immediately surrounding properties.

Direction	FLU	Zoning	Existing Use
North	Rural Residential, 1 unit per 10 acres (RR-10)	Special Agricultural (SA)	South Florida Water Management District (SFWMD) L-8 Reservoir
South	Rural Residential, 1 unit per 10 acres (RR-10)	Agricultural Residential (AR)	SFWMD Pump Station
East	Rural Residential, 1 unit per 10 acres (RR-10)	Special Agricultural (SA)	SFWMD Wildlife Corridor
West	Rural Residential, 1 unit per 10 acres (RR-10)	Special Agricultural (SA)	Florida Power and Light (FPL) Power Plant

Current Request:

The subject application seeks a Development Order Amendment (“DOA”) to increase the maximum floor area of permitted by right EDC uses within the MUPD in accordance with the Comprehensive Plan and consistent with the underlying traffic equivalency discussed above. Although not part of this application, the applicant has also included a proposed site plan for informational purposes as requested by the County.¹

The application seeks to amend the approved Master Plan to allow for a maximum of 3,594,564 sf of permitted by right EDC uses (specifically 1,032,000 sf Data and Information Processing, 216,000 sf Minor Utility, and 2,346,564 sf Warehouse). This is a reduction of 2.6% of the square footage, with an 8.9% increase in traffic due to the reallocation of uses. This is a reduction in square footage from the request recommended for approval by the Zoning Commission on December 4, 2025.

The proposed amendment to the master plan relates *only* to the tabular data, which is being amended to match the traffic study and concurrency already approved for the site. This is consistent with Ordinance 2025-003 which provides for a maximum of 491,749 sf of light industrial uses, and 2,786,577 sf of warehouse uses, *or other uses which do not exceed the equivalent traffic generating trips*. This equivalency provides the ability to adjust uses within the approved traffic so long as those uses are allowed within the EDC MUPD comprehensive plan and zoning designations, such as the Data and Information Processing use. The request is consistent with the previously approved equivalency.

The applicants’ traffic consultant has submitted a traffic study that utilized the previously approved equivalency process to convert the project’s traffic for a specific buildout plan for the uses to be included in the amended tabular data. The study confirms that the build out remains consistent and compliant with the conditions found in Ordinance 2025-003. The uses are permitted by right in the MUPD and ULDC.

APPLICABLE STANDARDS – Development Order Amendments

The applicable standards for the DOA to modify the tabular data on the approved Master Plan are found in Article 2.B.7.C.2 Development Order Amendments Standards of the ULDC. Each is discussed below.

Consistency with Plan

The tabular data change is consistent with the comprehensive plan. The future land use designation is EDC, which allows the uses. Further, Ordinance 2025-003 provides for the traffic equivalency, which is met. The DOA continues to take advantage of the Property’s unique attributes and expenditures made based on the existing approvals, including its

¹ Additional information for informational purposes will also be submitted, which includes studies done based on concerns over the approved Data and Information Processing use. This information is not relevant to the DOA as requested but is being provided to explain this use particularly to those who moved to the area after this use was approved.

proximity to reliable redundant power sources, fiber optic lines, and the site's unique elevation that provides flood resilience.

The proposal furthers Policy 2.2.4-a by promoting economic development on the site consistent with the standards and uses in the comprehensive plan and ULDC. As identified in engineering studies and submittals, the proposal meets all concurrency requirements. The applicant understands and agrees that the development will also need to meet, which it does, all requirements of the South Florida Water Management District.

Consistency with Code

The tabular data change is consistent with the ULDC. The uses are permitted by right within the EDC MUPD pursuant to Table 4.B.5.A of the ULDC. The Master Plan continues to meet the design requirements associated with it; those elements are not being changed.

The application was amended to change square footage allocations between the Data and Information Processing and Warehouse uses following the Board hearing on December 10, 2025. The amendment to the data table results in a 2.6% reduction in overall square footage from the prior certified application that the Zoning Commission recommended for approval, including a reduction in the overall Data and Information Processing use (though that prior application also met all requirements of the ULDC). There are no changes to the land area, vehicular use areas, parking, or other elements of the approved Master Plan. Further, the change in traffic remains consistent with the approved, vested traffic and results in only an 8.9% increase from the previously certified application that the Zoning Commission recommended for approval.

A future site plan will be submitted consistent with all the design requirements and performance standards of the ULDC for the permitted uses. In the event of any additional variances that go beyond the approval rights of the DRO, those additional changes would be presented to the Zoning Commission and the Board. However, as identified by the informational site plan submitted at the request of the County, additional variances are not anticipated.

Compatibility With Surrounding Uses

The permitted by right EDC uses have been determined to be compatible with surrounding uses on multiple occasions during the multiple reviews of the development of the Property. This was further confirmed when the Arden PUD was approved. The Arden PUD was required to be compatible with its surrounding uses, which included the Property, which was approved for the EDC uses at the time Arden was approved. The Arden PUD approval includes a line-of-sight study to demonstrate how the residential use would remain compatible with the existing and industrial development located on the Property. This line-of-sight study is included within the approved regulating plans for the Arden PUD, which indicates that the industrial improvements located to the west of the PUD are not within the view shed of any home sites within the Arden PUD.

In addition to the uses being permitted for the Property, which is the relevant question relative to the tabular data change, the future development of a site plan will comply with all relative ULDC provisions. As shown on the informational only site plan submitted at the County's request, compatibility can even be furthered by the significant increased spatial separation and buffering between the Data and Information Processing use and the residential and school uses to the east. Though not relevant to the data table, but to provide information to help address concerns, the applicant is providing a Preliminary Noise Impact Assessment ("Assessment") to show the existing background sounds and the modeling of the predicted sounds from the Data and Information Processing use based on the design incorporated into the informational site plan and preliminary equipment specifications. This Assessment shows that the facility will, at a minimum, meet all county sound regulations, and in many cases provide even less sound than is permitted. Though not required related to the data table changes, the applicant is willing to provide voluntary commitments to reduce potential impacts for the permitted by right Data and Information Processing use.

Design To Minimize Adverse Impacts

The Master Plan design elements are not being changed by this DOA. They have already been designed to minimize adverse impacts. The Master Plan provides for significant separations, setbacks, and landscape buffering where appropriate to minimize adverse impacts from the Property to the surrounding areas. The location of the MUPD minimizes the need for significant utility transmission facilities that would otherwise be required for the Data and Information Processing use thereby eliminating any external utility transmission impacts.

The existing and approved uses are buffered by the existing berm and trees along the Southern Blvd right of way, which is approximately 100 feet wide and planted with native landscape material. The east side of the MUPD will be further buffered from its neighbors by a 25 foot wide Type 3 landscape buffer planted with native landscape material; the 400 foot wide SFWMD wildlife corridor; the 500 foot wide SFWMD L-8 canal right of way; and a 46 foot wide buffer strip owned by the applicant, all of which provide approximately 971 feet wide of buffering and spatial separation from the Arden PUD's west property line. The combination of these significant spatial separations and buffers provide an opaque visual barrier as well as reducing potential sound impacts from the Data and Information Processing use. The L-8 Canal to the east also increases the spatial buffer as it provides additional separation between the approved permitted uses on the Property and Arden.

Further, although not related to the data table changes as the use is permitted by right, the Data and Information Processing use is also designed to minimize adverse impacts to potable water consumption by using a closed loop cooling system. Additionally, no effluent discharges from the cooling system into the county wastewater system will occur.

As identified in the materials provided, the closed loop system will minimize water use and will be used to support the secondary cooling methods. Based on current county

regulations, cooling water no matter what the source cannot be disposed of in the County's wastewater system without being treated to required standards. Any disposal of water from the closed loop cooling system will be trucked from Property by a licensed carrier to a licensed disposal facility.

In addition, though also not relevant to the data table changes, ground mounted chillers, transformers, and switchgear features will meet required limitations related to setbacks, height, noise, and nuisance standards as set forth in the ULDC. To further mitigate any potential sound impact related to the cooling and electrical equipment, the applicant agrees to place the majority of the cooling equipment inside an ancillary minor utility facility, as identified on the informational site plan, to isolate most cooling equipment within sound attenuating structures and locate those structures to the west of the Data and Information Processing buildings. This voluntary commitment will add assurances that the facility will operate below the applicable standards and sound levels as established by ULDC Table 5.E.4.B – Maximum Sound Levels. Again, the use is a by right use, but the applicant is willing to provide these additional commitments to address community concerns.

The Data and Information Processing use also requires the ability to provide emergency backup power in the event of a power failure or interruption. Like the other additional mitigation measures, though this is incorporated into the by right use, the applicant is willing to provide additional measures to mitigate even perceived adverse impacts. To that end, the applicant is willing to agree that backup power will be provided in the form of self-contained standalone hydrogen cells, batteries, or other green energy alternatives. These self-contained units will provide clean, safe, redundant backup power on site, minimizing the need for additional internal combustion or turbine generators and negating the need for additional fuel storage on site. The applicant also agrees to place these self-contained backup power options west of the Data and Information Processing use to provide the largest spatial separation from the uses to the east and provide a fire safety, prevention, and suppression plan as part of the building permit approval process.

Design Minimizes Environmental Impact

The Master Plan design elements are being changed by this DOA. The entire Property has been previously cleared, farmed, excavated, used for vegetation processing, asphalt plant and concrete plants and reclaimed with clean fill. The asphalt and concrete plants will be removed as part of the Data and Information Processing use construction. The elevation makes the Property extremely resistant to flooding by minimizing the potential negative environmental impacts associated with flooding or water intrusion. The berms and landscape buffers, sound mitigation strategies, stormwater system, and lighting directed towards the ground will further reduce the potential for offsite impacts to environmental resources.

Development Patterns

The uses are permitted uses within the MUPD. The development pattern providing for these uses was established and confirmed consistent with the surrounding area, including the Arden PUD when it was approved. The uses are strategically located near a primary and secondary power source utilizing the Property's unique attributes and consistent with the infrastructure improvements that have already been made consistent with the existing approvals for the Property. The existing development approvals ensure that compatibility will be maintained because of the established buffers and the significant spatial separation between the MUPD and the adjacent residential PD, which was designed to accommodate the adjacent EDC MUPD uses on the Property.

Adequate Public Facilities

The changes to the data table meet all concurrency requirements. Traffic is consistent with the equivalency for the Property included in Ordinance 2025-003. Water and sewer services are provided by PBC Water Utilities, drainage is through the South Florida Water Management District permitting (the applicant recognizes that future development may require modification to existing permits), Palm Tram serves the Property with an adjacent bus route and stop, Fire Rescue is served by PBC Fire House 20 & 21, and Police service is by PBCSO.

Changed Conditions

When the last DOA was approved in January 2025 the overall MUPD acreage was increased and the existing asphalt and concrete plant uses on that parcel were not affected. The applicant is now seeking to reallocate the permitted intensity for the entire Property to be consistent with the prior approvals as set forth in the history above, which when constructed will result in the termination of the asphalt and concrete plant uses.

Even though additional land was added to the MUPD in January 2025, the applicant is not seeking to add square footage beyond the original comprehensive plan approval. Instead, the applicant only seeks to utilize the previously approved intensity approved for the prior 138 acres to be spread out on the entire 202-acre MUPD thereby distributing the uses across the 202-acre Property and decreasing the overall intensity per acre on the Property.

Changes such as the recent electrical grid upgrades, technological breakthroughs in cooling and chip advances have now made it feasible to construct the Data and Information Processing use on the property. Additionally, with new businesses moving to Palm Beach County, enhancing our economic stability, and driving the need for data and information processing that comes with the current technological revolution in which we live, the Data and Information Processing use becomes more necessary.

Additionally, the applicant has spent significant time and money with engineering, planning, site improvements, and entering into a binding power agreement with FPL. This

FPL power agreement is required before any Data and Information Processing Use can be accommodated. It has strict timelines to design, develop, and pay for the required substation and transmission infrastructure needed to accept and condition the power needed for the use, in addition to a take or pay requirement for the power. The required payment will also be used to pay for additional FPL solar and backup battery infrastructure in accordance with the recent FPL rate case before the Florida Public Service Commission.

Conclusion

The applicant requests a limited change to the approved Master Plan and Regulating Plan, consistent with the permitted uses for the Property, to amend the data table to reallocate permitted uses on the Property. No changes to the 60-acre Phase 1 parcel or the entranceway parcel are requested. The DOA is consistent with the standards set forth in the ULDC and with the existing approved comprehensive plan designation, MUPD zoning, and regulations applicable to the Property. In addition, ancillary information – including studies and an informational site plan – support that the design of the permitted uses can be accommodated on the Property.

Project Tango
DOA 2025-1602
Control No. 2015-0085
DOA Post Certification 4.27.26 Resubmittal
By CF / Joseph Verdone, AICP Agent

The DOA resubmittal includes the following revised document:

- ✓ Justification Statement (word)
- ✓ Form 1 General Application (pdf format)
- ✓ Form 31 Concurrency Application (pdf format)
- ✓ Traffic Impact Study (pdf format)
- ✓ Final Master Plan (pdf and dwf formats)
- ✓ Final Regulating Plan 1 (pdf and dwf formats)
- ✓ Final Regulating Plan 3 (pdf and dwf formats)

The intent of this DOA revision is to logically address the concerns raised by the BCC by reducing and allocating the permitted by right MUPD EDC uses to focus the Data and Information Processing use on the western portions of the MUPD in order to provide additional spatial separation between the data center use and the residential uses to the east to ensure that the existing and permitted by right uses will minimize offsite impacts and comply to all county standards.

We believe that the proposed modification to the existing certified DOA application and plans complies with ULDC Section 2.B.4.E Application Modification after Certification.

The intent of Section 2.B.4.E, which relates to substantial changes, can only be related to increased impacts. It would not make sense that the zoning commission would need to review the proposed decreases in the overall site intensity or reallocation of by right uses that can be reallocated by the DRO administratively.

Even if Section 2.B.4.E did apply, it allows for applications to be “significantly modified after certification” when “requested or agreed to by the DRO.” In this case, we received clear directions from the County Commission, to which we all agree, you as the DRO included, to amend the application, to reallocate the amount of data and information processing use and change the plans accordingly. So, even if the “significantly modified,” standard is applied, we believe our amendments should be allowed in this circumstance.

In this case, even if the first part of Section 2.B.4.E did not apply, there has not been a 30% or more change from the certified DOA application that was reviewed and recommended by the Zoning Commission. The proposed amended Preliminary Master Plan reduces the total building square footage allowed on site from 3,692,000 SF to 3,594,564 SF, which is a reduction of 97,436 SF (a -2.6% decrease). The land area and master plan vehicular use areas will remain unchanged. As to traffic, the proposed change

increases the prior approved total trips from 3,196 to 3,479 (a +8.9% increase), which again is far below the 30 % threshold established in the code. These are the only changes proposed and they are intended to directly address the concerns raised at the BCC hearing. The changes are also supplemented with an environmental report for the property, background sound study, projected facility sound analysis studies based on the official bcc staff report and proposed conditions of approval in an effort to ensure the project meets all applicable Noise and Sound standards. The applicant remains willing to continue to collaborate on developing reasonable voluntary conditions to ensure compatibility with surrounding area.

In addition to the DOA resubmittal information above, the applicant is voluntarily including the following information in support of the DOA request, which includes advancing the background noise and sound modeling study recommended in the current staff report and conditions of approval. These supplementary documents include:

- ✓ Jacobs - Existing Background Noise Assessment as recommended by the proposed data center condition # 1.a) and Preliminary design analysis and preliminary design sound modeling as recommended by the proposed data center condition # 1.b) (pdf format)
- ✓ WGI Information Only Preliminary Site Plan to show the permitted by right uses being administratively reviewed by the DRO (pdf format)