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Board of County Commissioners
Palm Beach County
301 N. Olive Avenue
West Palm Beach, FL 33401

**RE: The County's Consideration of the Proposed Project Tango AI Data Center
(DOA/ZV-2025-01602)**

Dear Board,

We are writing on behalf of the Western Palm Beach Community Alliance ("WPBCA") regarding the proposed Project Tango hyperscale AI data center. The WPBCA is a grassroots advocacy organization dedicated to preserving the character, quality of life, and natural resources of the western communities of Palm Beach County. We advocate for responsible growth, environmental preservation, infrastructure planning, and meaningful public engagement to ensure residents have a voice in shaping the future of their neighborhoods and region.

We are incredibly concerned about the harm that would result from the proposed hyperscale AI data center. This facility is a completely different animal from a commerce center with warehouses and a "server farm," as approved in 2016. Instead, this proposal would transform into a heavy industrial AI data center that could harm Arden, the Saddle View Elementary School, the Loxahatchee National Wildlife Refuge, and Everglades restoration projects.

In particular, sound pollution from this facility will likely result in stress, lack of sleep, and potential interruptions in concentration and heart health. Moreover, heat pollution from either water discharges or AI data center heat island effects could raise the temperature of the nearby canal, which connects the Northern and Southern Everglades system, and risks increasing algal blooms. And these harms come without any meaningful economic opportunities, despite that being the original intent of this Economic Development Center ("EDC").

We therefore respectfully request that the Board deny PBA Holdings' application for a Master Site Plan amendment to include the Project Tango AI data center because AI data centers (1) do not qualify as "light industrial uses;" (2) do not qualify under "data information and processing;" and (3) are incompatible with Multiple Used Planned Development ("MUPD"), EDC, and Glades Area Protection Overlay designations.

The County's decision is particularly important because of the precedent it will set for any land zoned for "light industrial use" and "data information and processing." If the Board finds that an AI data center qualifies as "data information and processing" and a "light industrial

use,” any land that is currently zoned for these uses could potentially be transformed into an AI data center through administrative approvals, and without Planning and Zoning or Board approval.

As we have seen, the landowners on this very plot of land have already tried to avoid Board review in changing their warehouse developments into AI data center heavy industrial complexes. If the County approves this application, it will be placing at risk all communities adjacent to land zoned for light industrial, MUPD, EDC, GAPO, and “data and information processing” uses. The County should decline this invitation.

Please note that this letter relies on citations to a number of resources that we have compiled into the following ShareFile folder: <https://earthjustice.sharefile.com/d-sbcec41b514254b169abaef97b6d41508>. We also hereby incorporate and attach our prior correspondence with the Board and Zoning.¹ We ask that these resources be included in the formal record for the July 2, 2026, hearing before Zoning and the July 15, 2026, hearing before the Board.

¹ See Attachment A.

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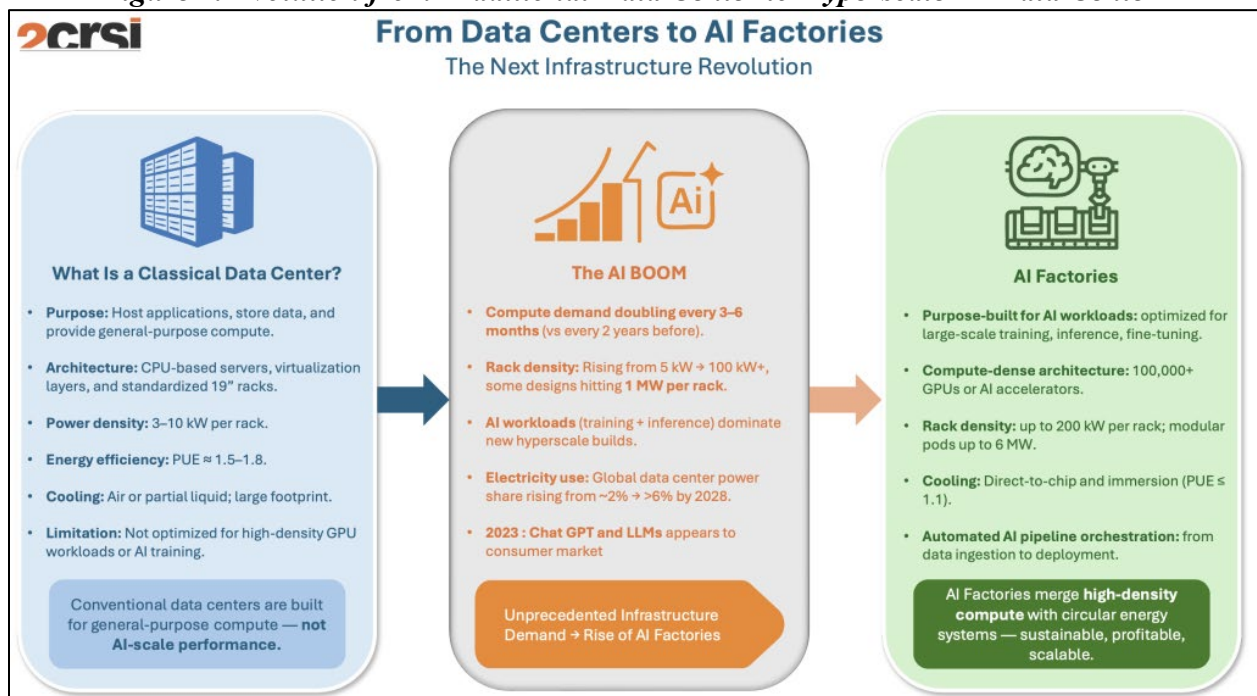
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FACTUAL BACKGROUND ON AI DATA CENTERS AND THEIR HARMFUL EFFECTS

I. Traditional data centers and hyperscale AI data centers are entirely different uses that require different regulations.

“AI datacenters are not just upgraded traditional datacenters—they are engineered from the ground up to handle next-generation workloads.”² They are entirely different in terms of the equipment and technology within the data center, the services they provide, as well as the impacts they have on our land, energy, water, air, and acoustic environment. To put it simply, a traditional data center is like building a single-family home, while a hyperscale AI data center is like compressing multiple industrial sites onto a single plot of land.

Figure 1. Evolution from Traditional Data Center to Hyperscale AI Data Center



²*AI Datacenters vs. Traditional Data Centers: What’s the Difference*, Cloudnium, May 4, 2025, [https://cloudnium.net/articles/view.php?slug=ai-datacenters-vs-traditional-datacenters-whats-the-difference#:~:text=%F0%9F%94%8C%202.&text=AI%20hardware%20consumes%20far%20more,Immersion%20cooling%20\(for%20extreme%20setups\).](https://cloudnium.net/articles/view.php?slug=ai-datacenters-vs-traditional-datacenters-whats-the-difference#:~:text=%F0%9F%94%8C%202.&text=AI%20hardware%20consumes%20far%20more,Immersion%20cooling%20(for%20extreme%20setups).)

To help the Board conceptualize these differences, we have created a detailed table that outlines the available information about all existing traditional data centers in Florida. See Attachment A. This research demonstrates that AI data centers should not be grouped together with traditional data centers:

- **Dates of Operation:** Traditional server farms have existed since the late nineties and early 2000s. However, AI data centers have only existed for the past six years.³
- **Square Footage:** The largest traditional data center in Florida is only 280,000 sf. Even at the current scaled-down version, Project Tango is almost 4 times that size.
- **Electricity Demand:** The most electricity required at a traditional data center in Florida is 35 megawatts. Project Tango will require more than 17 times that amount of power.
- **Cooling Technologies:** Almost all of the existing traditional data centers rely on specialized **computer room air conditioning (“CRAC”)** systems to maintain the temperature, humidity, and airflow needed. AI data centers require advanced cooling technologies that come with significant community and environmental impacts.⁴
- **Impacts:** We are not aware of any negative community or environmental impacts from traditional data centers. However, hyperscale AI data centers have demonstrated harmful impacts in terms of noise, air, water, heat, and hazardous electronic waste pollution.⁵ These facilities also place surrounding communities at risk from an environmental disaster if a fire were to break out.⁶

³ *Data Centers 101: The Evolution of DCs Over Time*, Impact Capital Partners, Oct. 8, 2025, <https://impactcp.org/insights/data-centers-101-the-evolution-of-dcs-over-time/#:~:text=The%20current%20decade%20marks%20the,use%20and%20thermal%20management%20challenges>.

⁴ *What Sets Hyperscalers Apart from Traditional Data Centers?*, Airsys, July 10, 2024, <https://airsysnorthamerica.com/what-sets-hyperscalers-apart-from-traditional-data-centers>; Phill Powell, *Hyperscale vs. Colocation: Go Big or Go Rent?*, IBM, <https://www.ibm.com/think/topics/hyperscale-vs-colocation> (last visited Mar. 26, 2026).

⁵ See, e.g., *The Data Center Next Door: The Hidden Costs of AI and Crypto: Stories from Impacted Communities*, Senator Ed Markey, https://www.markey.senate.gov/imo/media/doc/the_data_center_next_door_the_hidden_costs_of_ai_and_crypto.pdf.

⁶ Peter Judge, *Fire Destroys OVHcloud’s SBG2 Data Center in Strasbourg*, DCD Magazine, Mar. 10, 2021, <https://www.datacenterdynamics.com/en/news/fire-destroys-ovhclouds-sbg2-data-center-strasbourg>; Matthew Gooding, *Five Charged with Professional Negligence Over South Korea Gov’t Data Center Fire*, DCD Magazine, Oct. 27, 2025, <https://www.datacenterdynamics.com/en/news/five-charged-with-professional-negligence-over-south-korea-govt-data-center-fire>; *How Much Government Data was Lost in a Data Center Fire in South Korea?*, GovTech, Oct. 16, 2025 <https://www.govtech.com/question-of-the-day/how-much-government-data-was-lost-in-a-data-center-fire-in-south-korea>; Jack Kim, *South Korea*

Table 1. Traditional Versus Hyperscale AI Data Centers⁷

	Traditional Data Center	Hyperscale AI Data Center
Timelines	2000s and 2010s	2020s
Purpose	Mission critical infrastructure (e.g., external servers, cloud computing)	High-density AI (e.g., ChatGPT, Grok)
Hardware Requirements	Standard server racks	Specialized AI server racks
	General-purpose chips (CPUs)	Specialized chips (like GPUs and TPUs)
Network Architecture	Standard ethernet (1–10 gigabytes per second)	High-speed, low-latency fabric (100+ gigabytes per second)
Energy Needs	Low/moderate (5–10 kW per server rack)	Ultra-high (30–50+ kW per server rack)
Cooling Systems	Traditional air cooling (e.g., HVAC or CRAC)	Advanced cooling systems (e.g. cooling towers)
Community and Environmental Impacts	None	Air, water, noise, heat, and hazardous pollution
		Fire safety risks
		Overwhelm of existing water and electric infrastructure
Economic Opportunity	Often co-located with office buildings, warehouses, etc.	Often stand-alone facilities with few jobs

Therefore, hyperscale AI data centers must be looked at as a distinct use from traditional data centers. As industry itself has explained, their size, energy and infrastructure needs, and substantial impacts classify them in a different category.

Scrambles to Restore Services After Major State Data Centre Fire, Reuters, Sept. 27, 2025, <https://www.reuters.com/markets/emerging/south-korea-state-data-centre-fire-knocks-out-online-services-quick-response-2025-09-26>.

⁷ *AI Datacenters vs. Traditional Data Centers: What’s the Difference*, Cloudnium; Juan Pedro Tomás, *What is an AI Hyperscale Data Center? — Five Features and Three Reasons They Matter*, Apr. 1, 2025, <https://www.rcrwireless.com/20250401/fundamentals/ai-hyperscale-data-center#:~:text=%2DMassive%20scale%20%E2%80%93%20These%20facilities%20are,to%20deliver%20real%20time%20results>; *Data Centers 101: The Evolution of DCs Over Time*, Impact Capital Partners; *From Data Centers to AI Factories: The Next Infrastructure Revolution*, Impact Capital Partners, Oct. 15, 2025, <https://impactcp.org/insights/from-data-centers-to-ai-factories-the-next-infrastructure-revolution>; Sean Michael Kerner, *Why AI Rack Densities Make Liquid Cooling Nonnegotiable*, Network World, Mar. 25, 2026, <https://www.networkworld.com/article/4149069/why-ai-rack-densities-make-liquid-cooling-nonnegotiable.html>.

The South Florida Regional Planning Council (“SFRPC”) agrees. SFRPC recently advised Miami-Dade County that data centers “**should not be treated under broad ‘office’ or ‘industrial’ land use categories due to their potentially significant impacts on state and regional infrastructure, utilities, and resources.**”⁸ Instead, the SFRPC states that these facilities require a “**distinct and specialized land use category.**”⁹ The County should follow this well-founded recommendation.

II. Jurisdictions across the State have come out in opposition to AI data center developments.

We’ve already watched our State legislature pass SB484 this past year, sending a clear message by requiring AI data centers to pay their fair share of electricity costs and that AI data centers, may only rely on treated wastewater, and by **prohibiting approval** of a large-scale data center **if it will be “harmful to the water resources of [an] area.”**¹⁰ Fla. Stat. §§ 366.043(3)(a), 373.262(1)–(3) (emphasis added). This statute took effect July 1, 2026.

And local governments across Florida have taken action against AI data center projects:

- **Ten local governments have passed moratoria** on AI data center development: Citrus, Clay, DeSoto, Hernando, Jackson, Lake, Nassau, Santa Rosa, and Wakulla Counties and the City of Zephyrhills.¹¹

⁸ Attachment A.

⁹ *Id.*

¹⁰ SB484 (2026), <https://www.flsenate.gov/Session/Bill/2026/484/?Tab=BillText>.

¹¹ Emily L. Mahoney, *Company Behind Citrus County Data Center Withdraws Proposal Amid Backlash*, Tampa Bay Times, June 24, 2026, <https://www.tampabay.com/news/environment/2026/06/23/citrus-county-data-center-holder-deltona-corporation-florida>; J.T. Lynch, *Jackson County Commissioners Vote on Moratorium for AI Data Centers*, WJHG, May 26, 2026, <https://www.wjhg.com/2026/05/26/jackson-county-commissioners-vote-moratorium-ai-data-centers>; Lisa MacNeil, *Hernando County Commissioners Approve One Year Data Center Moratorium*, Hernando Sun, June 5, 2026, <https://www.hernandosun.com/2026/06/05/hernando-county-commissioners-approve-one-year-data-center-moratorium>; Randall Vuxta, *Data Centers in Jackson County are Officially Banned*, WFSU, June 11, 2026, <https://news.wfsu.org/wfsu-local-news/2026-06-11/data-centers-in-jackson-county-are-officially-banned>; Serena Davanzo, *Wakulla Co. Commission Unanimously Votes to Ban Data Centers*, June 15, 2026, WXTL, <https://www.wtxl.com/news/local-news/in-your-neighborhood/wakulla-county/wakulla-county-commissioners-move-towards-banning-data-centers>; Sandra Averhart, *Santa Rosa to Develop a 12-Month Moratorium on Data Centers*, WUWF, June 23, 2026, <https://www.wuwf.org/text/local-news/2026-06-23/santa-rosa-to-develop-a-12-month-moratorium-on-data-centers>; Fabrizio Gowdy, *Three Counties Moving Forward with One-Year Data Center Moratoriums*, Florida Politics, June 23, 2026, <https://floridapolitics.com/archives/803697-three-counties-moving-forward-with-one-year-data-center-moratoriums>; Kennedy Walsh, *As Data Centers Spread Across Florida, Lake County Says ‘Not So Fast,’* WESH, June 23, 2026, <https://www.wesh.com/article/lake-county-florida-data-center-moratorium/71681894>; WJHG Newsroom, *Jackson County Adopts Ordinance Banning*

- **Five more local governments** are currently **considering similar moratoria**: Escambia, Leon, Pasco, and Pinellas Counties and the City of Lakeland.¹²
- **Three counties have denied** AI data center projects:
 - **In St. Lucie County**, the planning board voted against a billion-dollar data center proposal, and the developers later withdrew their application.¹³

Data Centers, WJHG, June 23, 2026, <https://www.wjhg.com/2026/06/23/jackson-county-adopts-ordinance-banning-data-centers>; Caysea Stone, *Clay County Commissioners Approve One-Year Moratorium on Data Centers*, Action News JAX, June 24, 2026, <https://www.actionnewsjax.com/news/local/clay-county-commissioners-approve-one-year-moratorium-data-centers/GM7HRVAP3ND2TJ4SNUG3HAPABI>; Curt Anderson, *AI Boom Meets Backlash in Florida Over Water and Energy Use*, Tallahassee Democrat, June 25, 2026, <https://www.tallahassee.com/story/news/politics/2026/06/25/ai-data-centers-florida-resisted-many-counties-cities-pause-moratorium/90673957007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epit=z114728p0006501004150c000650e005100v114728d--87--b--87--&gca-ft=164&gca-ds=sophi>; Alice Herman, *Uncertain Environmental Impacts Prompt DeSoto County to Pursue Data Center Moratorium*, WCGU, June 25, 2026, <https://www.wgcu.org/top-story/2026-06-25/after-public-outcry-desoto-county-moves-forward-on-data-center-moratorium>; Marian Summerall, *Lake County Commission Plans Temporary Ban on Data Centers*, CFPM, June 25, 2026, <http://cfpublic.org/2026-06-25/lake-county-commission-plans-temporary-ban-on-data-centers>.

¹² WTXL, *Leon County Moves to Pause Large-Scale Data Centers; City Commission Rejects Similar Motion*, WTXL, June 11, 2026, <https://www.wtxl.com/downtown-tallahassee/leon-county-moves-to-pause-large-scale-data-centers-city-commission-rejects-similar-motion>; Jason Lanning, *Pasco Commissioners to Consider One-Year Moratorium on Data Centers*, BayNews9, June 16, 2026, <https://baynews9.com/fl/tampa/news/2026/06/16/pasco-county-commissioners-to-consider-one-year-moratorium-on-new-data-centers>; Tom McLaughlin, *Santa Rosa to Put Temporary Moratorium on Data Centers*, Pensacola News Journal, June 22, 2026, <https://www.pnj.com/story/news/local/santa-rosa/2026/06/22/santa-rosa-data-center-moratorium-being-drafted/90640789007>; WEAR, *Escambia County to Consider Banning Data Centers, FloridaWest CEO Denies Negotiations*, WEAR, June 22, 2026, <https://weartv.com/news/local/escambia-county-to-consider-banning-data-centers-floridawest-ceo-denies-negotiations>; Andy Paden, *Hernando County Becomes Second Tampa Bay-area County to Pause Data Center Projects*, WTSP, June 23, 2026, <https://www.wtsp.com/article/news/local/hernandocounty/hernando-county-pauses-data-center-projects/67-1a9d031f-e2fc-49a9-9129-401536752dd8>; Curt Anderson, *AI Boom Meets Backlash in Florida over Water and Energy Use*, June 25, 2026.

¹³ Justin Breckenridge, *St. Lucie County Planning Board Votes Against Billion-Dollar Data Center Proposal in Fort Pierce*, WQCS, Oct. 17, 2025, <https://www.wqcs.org/wqcs-news/2025-10-17/st-lucie-county-planning-board-votes-against-billion-dollar-data-center-proposal-in-fort-pierce>; Rachael Perry, *Developers Hit Pause on St. Lucie Data Center Plans*, WPBF, Feb. 25, 2026, <https://www.wpbfb.com/article/developers-hit-pause-on-st-lucie-county-data-center-plans/70483481>.

- **In Okeechobee County**, a 205-acre data campus was effectively shut down when the County voted to remove the “Special Technology Opportunities Centers” from their comprehensive plan.¹⁴
- **In Citrus County**, the planning and development commission voted down a rezoning plan for an AI data center due to resident’s concerns about the proximity of the project to their homes as well as the potential environmental impacts.¹⁵

Palm Beach County would be in lockstep with the other Florida local governments by denying this application.

III. A broad coalition opposes Project Tango.

A diverse group of local communities, environmental nonprofits, and education organizations have voiced concern and opposition to Project Tango.¹⁶

- Resolutions in opposition have been issued by **seven nearby communities**: Fox Trail, Wellington, the Indian Trail Improvement District, Arden, the City of Westlake, the Town of Loxahatchee Groves, and the Acreage Landowners Association.
- The **Palm Beach County Democratic Party**, **Senator Lori Berman**, and **Senator Meg Weinberger** have all written letters in opposition.
- The **Classroom Teachers Association** and the **Palm Beach County School Board** have voiced concerns about the impacts to the students of Saddle View Elementary School.
- And the **Everglades Coalition**, the **Friends of the Loxahatchee National Wildlife Refuge**, and the **Sierra Club Loxahatchee Group** have voiced their concerns about the impacts that this facility will have on the surrounding environment, the Loxahatchee Wildlife Refuge, and the greater Everglades.

¹⁴ Wilkine Brutus, *Scrapped Data Center in Okeechobee County Mirrors Rising Opposition to Data Centers in South Florida*, WUSF, Apr. 29, 2026, <https://www.wusf.org/politics-issues/2026-04-29/scrapped-data-center-in-okeechobee-county-mirrors-rising-opposition-to-data-centers-in-south-florida>.

¹⁵ Calvin Lewis, *Citrus County Panel Rejects Holder Industrial Park Data Center Rezoning*, Bay News 9, Jun. 18, 2026, <https://baynews9.com/fl/tampa/news/2026/06/18/citrus-county-planning-and-development-commission-vote-down-on-holder-industrial-park-plan>.

¹⁶ See Attachment C.

IV. Project Tango (and any other AI data center) will likely cause significant harm to surrounding communities and the environment.

Across the country, hyperscale AI data centers have demonstrated harmful impacts in terms of noise, air, water, heat, and hazardous electronic waste pollution.¹⁷ The following sections will provide an overview of the many and varied harms that result from these facilities.

A. High and low-frequency sounds from AI data centers harm the health and welfare of nearby communities.

Noise pollution from hyperscale AI data center construction, generators, cooling systems, and energy sources can harm workers and nearby residents. Reporting shows that this noise can cause headaches, stress, and disrupted sleep, which in turn leads to cognitive impairment and cardiovascular risks.¹⁸

Low-frequency sound can harm our psychological well-being in ways science is only beginning to understand. Low-frequency sound is perceived by our entire body, which can trigger physiological and psychological responses.¹⁹ Studies have shown that prolonged exposure to low frequency noise can harm concentration, memory, and decision-making.²⁰ Low-frequency sound can also have a profound impact on our emotional state.²¹ Many people report feeling increased anxiety, irritability, and mood swings when exposed to persistent low

¹⁷ See, e.g., *The Data Center Next Door: The Hidden Costs of AI and Crypto: Stories from Impacted Communities*.

¹⁸ Ana Faguy, *A Humming Annoyance or Job Booms? Life Next to 199 Data Centres*, BBC, Oct. 25, 2025, <https://www.bbc.com/news/articles/c93dnnxewdvo>; Madelyn Zander, *The Cloud is Too Loud: Spotlighting the Voices of Community Activists from the Data Center Capital of the World*, CASTAC, Aug. 13, 2024, <https://blog.castac.org/2024/08/the-cloud-is-too-loud-spotlighting-the-voices-of-community-activists-from-the-data-center-capital-of-the-world>; Ryan Murphy & Emily Feng, *Why More Residents are Saying 'No' to AI Data Centers in Their Backyard*, NPR, July 17, 2025, <https://www.npr.org/2025/07/17/nx-s1-5469933/virginia-data-centers-residents-saying-no>; *The Data Center Next Door: The Hidden Costs of AI and Crypto*, Senator Edward J. Markey, <https://www.markey.senate.gov/datacenterstories>; Kevin J. Coyle, *What Research Says About the Public Health Dangers of Noise Pollution*, Draft for Review for Prince William County, <https://www.pwcva.gov/assets/2025-05/DCOAG%20White%20Paper%20-%20What%20Research%20Says%20About%20the%20Public%20Health%20Dangers%20of%20Noise%20Pollution%2020250507.pdf> [hereinafter Coyle, *Public Health Dangers of Noise Pollution*]; Yu Tao & Peng Gao, *Global Data Center Expansion and Human Health: A Call for Empirical Research*, 3 *Eco-Environment & Health* 4 (2025), <https://doi.org/10.1016/j.eehl.2025.100157>; Kelly Richardson, *Understanding the Impact of Data Center Noise Pollution*, Tech Target, Dec. 3, 2024, <https://www.techtarget.com/searchdatacenter/tip/Understanding-the-impact-of-data-center-noise-pollution>.

¹⁹ Coyle, *Public Health Dangers of Noise Pollution*.

²⁰ *Id.*

²¹ *Id.*

frequency noise.²² Sleep disturbances are another common complaint associated with low-frequency sound, creating a vicious cycle exacerbating cognitive and emotional issues.²³

A 2020 meta review of low-frequency sound health research literature by European researchers found that “the main effects on human health (of exposure to low-frequency noise) are more prevalent in aspects such as **sleep disorders** (11.7%), discomfort, sensitivity and irritability to noise (10%), annoyance (13.3%), **stress** (6.7%), **hearing loss** (8.3%), reduced performance/fatigue (5%), **heart rate/cardiovascular diseases** (10%), **tension and blood pressure** (6.7%), **anxiety** (1.7%), **depression** (3.3%), imbalance (3.3%), and **mental performance** (6.7%).”²⁴

B. Hyperscale AI data centers result in the release of more nitrogen oxide and particulate matter.

Air pollution from data centers alone could cause an additional 600,000 asthma cases annually in the United States and an estimated 1,300 premature deaths by 2030.²⁵ This project will likely result in the neighboring FPL natural gas plant running more often and for longer periods of time, and therefore causing more air pollution.²⁶ It will also require significant onsite back-up generation, which will provide another source of air pollution.

Natural gas generation emits **nitrogen oxide** affecting the respiratory system by irritating the eyes, nose, and throat, leading to coughing, shortness of breath, and inflammation.²⁷ Nitrogen oxide is also a precursor for **particulate matter**, which cause respiratory issues like coughing, asthma, bronchitis, and reduced lung function, as well as heart problems such as heart attacks, strokes, and irregular heartbeats, with long-term exposure linked to lung cancer, diabetes, and premature death.²⁸ And natural gas plants are a source of **noise pollution**, which could exacerbate the added noise pollution from the data center itself.²⁹

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ Adam Wierman, *Air Pollution and the Public Health Costs of AI*, Caltech, Dec. 10, 2024, <https://www.caltech.edu/about/news/air-pollution-and-the-public-health-costs-of-ai>; Yuelin Han et al., *The Unpaid Toll: Quantifying the Public Health Impact of AI*, arXiv, Oct. 23, 2025, <https://arxiv.org/pdf/2412.06288>.

²⁶ Adam Wierman, *Air Pollution and the Public Health Costs of AI*; Yuelin Han et al., *The Unpaid Toll: Quantifying the Public Health Impact of AI*.

²⁷ *Clearing the Air*, Env’t Defense Fund, <https://turbinemap.edf.org> (last visited Mar. 26, 2026).

²⁸ *Id.*

²⁹ Patrick Saussus, *Major Noise Sources and Mitigation Cost Estimates for Gas-Fired Power Facilities*, Power Mag, Oct. 1, 2012, <https://www.powermag.com/major-noise-sources-and-mitigation-cost-estimates-for-gas-fired-power-facilities>.

We have also seen that hyperscale AI data centers have constructed methane gas turbines to power their facilities.³⁰ For example, in Mississippi, xAI installed 27 unpermitted natural gas turbines to power its hyperscale AI data center.³¹ The company then applied to operate 41 permanent turbines at this site, which will introduce “smog-forming nitrogen oxides, chemicals like formaldehyde, and fine particulate matter.”³² The pollution from this one facility “**could result in an estimated \$30-\$44 million in annual health damages each year.**”³³

Similarly, in Virginia, on-site generation at Vantage’s facility (including eight gas turbines and 51 diesel generators) would increase air pollution and “result in an **estimated \$53 million – \$99 million per year in health-related damages**, driven primarily by an **estimated 3.4–6.5 additional premature deaths per year** across the impacted region, along with additional costs from nonfatal hospital admissions, asthma-related outcomes, and lost productivity.”³⁴

³⁰ *New Study Finds Proposed xAI Gas Plant Could Worsen Regional Air Pollution, Cause Millions of Dollars in Annual Health Damages*, SELC, Feb. 16, 2026, <https://www.selc.org/press-release/new-study-finds-proposed-xai-gas-plant-could-worsen-regional-air-pollution-cause-millions-of-dollars-in-annual-health-damages/#:~:text=MEMPHIS%2C%20Tenn.,of%20dollars%20in%20health%20damages;Michael%20Cork%20&%20Francesca%20Dominici,Air%20Quality,Health,and%20Economic%20Impacts%20of%20the%20Proposed%20MZXTech%20Facility,EmPower%20Analytics%20Group%20LLC,Febr.13,2026,https://southernenvironment.sharefile.com/share/view/16a253b1f4534026/foc0fb51-03a4-405e-9198-b5f76b4661b2>.

³¹ *New Study Finds Proposed xAI Gas Plant Could Worsen Regional Air Pollution, Cause Millions of Dollars in Annual Health Damages*, SELC.

³² *Id.*

³³ *Id.*

³⁴ *Press Release: New Study Finds On-Site Power at Virginia Data Center Could Result in \$53 Million–\$99 Million in Annual Health Damages*, Piedmont Env’t Council, Mar. 4, 2026, <https://www.pecva.org/resources/press/press-release-new-study-finds-on-site-power-at-virginia-data-center-could-result-in-53-million-99-million-in-annual-health-damages;Michael%20Cork%20&%20Francesca%20Dominici,Air%20Quality,Health,and%20Economic%20Impacts%20of%20the%20Vantage%20Data%20Center%20Facility,EmPower%20Analytics%20Group%20LLC,Febr.27,2026,https://www.pecva.org/wp-content/uploads/Health-Impacts-Vantage-Data-Center-Report-2.pdf>.

C. Hyperscale AI data centers consume an incredible amount of water to cool their facilities, even when closed-loop cooling systems are employed.

Massive water consumption is one of the key features of existing hyperscale AI data centers. Large data centers, like the one proposed here, can consume up to **5 million gallons per day**, equivalent to the water use of a town populated by 10,000 to 50,000 people.³⁵ According to scientists, each 100-word AI prompt is estimated to use roughly one bottle of water.³⁶

Although PBA Holdings has said that it **hopes to employ a closed-loop cooling system** to reduce consumption, that does not necessarily mean it will still not need to consume copious quantities of water. Indeed, a recent scientific study explained that **in hotter climates, closed-loop cooling systems are not able to allow hyperscale AI data centers to operate at their peak**.³⁷ “For example, a leading technology company’s state-of-the-art data center under construction to host AI and core products employs a ‘closed-loop, liquid-cooled system that recirculates the same water’, **but still needs up to 8 MGD for facility-level (evaporative) cooling assistance** during the hottest days of the year.”³⁸

D. The cooling technologies used at AI data centers create polluted wastewater that harms nearby communities and the environment.

When the wastewater (or “greywater”) used for evaporative cooling contains pollutants (like **nitrates**), that pollution becomes concentrated as fresh water evaporates.³⁹ The result is that the hyperscale AI data center’s discharges will include highly concentrated pollution.⁴⁰

³⁵Miguel Yañez-Barnuevo, *Data Centers and Water Consumption*, EESI, June 25, 2025, <https://www.eesi.org/articles/view/data-centers-and-water-consumption#:~:text=Data%20center%20developers%20are%20increasingly,energy%20usage%20by%20data%20centers>.

³⁶ Miguel Yañez-Barnuevo, *Data Centers and Water Consumption*.

³⁷ Yuelin Han et al., *Small Bottle, Big Pipe: Quantifying and Addressing the Impact of Data Centers on Public Water Systems* 46, Mar. 18, 2026, <https://doi.org/10.48550/arXiv.2603.02705>.

³⁸*Id.*

³⁹ Ganesh Hegde, *Discharge from AI Data Centers and How to Mitigate Contamination*, Ketos, July 24, 2024, <https://ketos.co/discharge-from-ai-data-centers-and-how-to-mitigate-contamination>; *Sources and Solutions: Wastewater*, EPA, Nov. 12, 2025, <https://www.epa.gov/nutrientpollution/sources-and-solutions-wastewater#:~:text=Wastewater%20Treatment%20Plants,up%20saving%20a%20plant%20money;WastewaterTreatmentWaterUse,USGS,Jan.18,2018,https://www.usgs.gov/water-science-school/science/wastewater-treatment-water-use#:~:text=Metals%2C%20such%20as%20mercury%2C%20lead,the%20uses%20of%20reclaimed%20wastewater>.

⁴⁰ Sean Patrick Cooper, *‘The Precedent Is Flint’: How Oregon’s Data Center Boom Is Supercharging a Water Crisis*, Rolling Stone, Nov. 24, 2025, <https://www.rollingstone.com/culture/culture-features/data-center-water-pollution-amazon-oregon-1235466613>; Ganesh Hegde, *AI Data Centers, Wastewater Discharge, and the Growing Need for Effective Water Management*, Ketos, July 10, 2024, <https://ketos.co/ai-data-centers->

PBA Holdings has claimed that it will install its own pre-treatment facility or deep-well injection site, but neither will prevent any and all releases of these chemicals into groundwater and the surrounding watershed.

Another cooling technology is a closed-loop system, which PBA Holdings has pointed to as a potential technology for their facility. But this technology would likely introduce chemical pollution into the surrounding environment. Closed-loop systems rely on a cocktail of additives such as **corrosion inhibitors, biocides, and antifreeze blends** to make sure the water can flow through the closed-loop system repeatedly.⁴¹ This cocktail can also include **forever chemicals or PFAS**, which can cause altered immune and thyroid function, liver disease, lipid and insulin dysregulation, kidney disease, adverse reproductive and developmental outcomes, and cancer.⁴² As with evaporative systems, these chemicals are concentrated as the water moves through the cooling water system.⁴³ When blow-down finally leaves the site, it can also carry nitrite, glycol, and heavy metals at thousands of times the limits set for surface waters.⁴⁴

[wastewater-discharge-and-the-growing-need-for-effective-water-management#:~:text=Temperature:%20Cooling%20discharge%20can%20raise,and%20harm%20downstream%20water%20quality.](#)

⁴¹ Ganesh Hegde, *Closed-Loop Cooling: Water Saver or Chemical Time Bomb?*, June 11, 2025, <https://ketos.co/closed-loop-cooling-water-saver-or-chemical-time-bomb>.

⁴² Lauren Hines-Acosta, *Concerns Raised about 'Forever Chemicals' in Data Centers*, Bay Journal, Dec. 8, 2025, https://www.bayjournal.com/news/pollution/concerns-raised-about-forever-chemicals-in-data-centers/article_477e0100-d2d2-4bad-95c6-7855f4bae775.html; Dizar Al Kez et al., *AI-Driven Cooling Technologies for High-Performance Data Centres: State-of-the-Art Review and Future Directions*, 82 Sustainable Energy Tech. & Assessments 104511 (2025), <https://www.sciencedirect.com/science/article/pii/S221313882500342X>; Suzanne E. Fenton et al., *Per- and Polyfluoroalkyl Substance Toxicity and Human Health Review: Current State of Knowledge and Strategies for Informing Future Research*, 40 Environ. Toxicol. Chem. 606 (2021), <https://pmc.ncbi.nlm.nih.gov/articles/PMC7906952>.

⁴³ Ganesh Hegde, *Closed-Loop Cooling: Water Saver or Chemical Time Bomb?*

⁴⁴ *Id.*

E. AI data centers have a heat island effect, which would exacerbate extreme heat in South Florida.

A recent study has also shown that data centers are creating heat islands, “warming the land around them by up to 16 degrees Fahrenheit.”⁴⁵ And this effect “is not limited to the immediate proximity of their locations.”⁴⁶ Indeed, the heat increases reach up to 10 km from the hyperscale AI data center.⁴⁷ As the researchers explained, this “data heat island effect could affect the welfare, healthcare, energy, and demographic systems.”⁴⁸

F. Fires at hyperscale AI data centers create massive environmental disasters.

Hyperscale AI data centers rely on various types of batteries, including lead-acid batteries, lithium-ion batteries, and nickel-cadmium batteries.⁴⁹ Lithium-ion batteries in particular are more common in modern hyperscale AI data centers and can increase fire hazards.⁵⁰ There have been fires at hyperscale AI data centers (e.g., OVHcloud and SK C&C).⁵¹ A fire at this facility could create an environmental disaster, spreading toxic chemicals from lithium-ion batteries (such as hydrogen fluoride), as well as particulate matter, carbon monoxide, nitrogen oxides, and volatile organic compounds.⁵²

⁴⁵ Laura Paddison, *Scientists Have Found an Alarming Environmental Impact of Vast Data Centers*, CNN, Mar. 30, 2026, <https://www.cnn.com/2026/03/30/climate/data-centers-are-having-an-underreported>.

⁴⁶ Andrea Marinoni et al., *The Data Heat Island Effect: Quantifying the Impact of AI Data Centers in a Warming World* at 6, Mar. 21, 2026, <https://arxiv.org/abs/2603.20897v1>.

⁴⁷ *Id.*

⁴⁸ *Id.* at 10.

⁴⁹ Robert Losurdo, *What Hazardous Materials Are Found in a Data Center?*, MCF Env’t Services, Aug. 28, 2025, <https://mcfenvironmental.com/what-hazardous-materials-are-found-data-center/#:~:text=Data%20center%20hazardous%20waste%20doesn,to%20know%20to%20stay%20compliant>.

⁵⁰ *Id.*

⁵¹ Peter Judge, *Fire Destroys OVHcloud’s SBG2 Data Center in Strasbourg*; Matthew Gooding, *Five Charged with Professional Negligence Over South Korea Gov’t Data Center Fire*; *How Much Government Data was Lost in a Data Center Fire in South Korea?*, GovTech; Jack Kim, *South Korea Scrambles to Restore Services After Major State Data Centre Fire*; Byun Hye-Jin, *Battery Blaze at State Data Center Casts Shadow over ESS Growth*, The Korea Herald, Sept. 28, 2025, <https://www.koreaherald.com/article/10585116>; *Strasbourg Data Center Fire — Latest information*, OVHcloud, Apr. 23, 2021, <https://corporate.ovhcloud.com/en/newsroom/news/informations-site-strasbourg>; Andy Lawrence, *Learning from the OVHcloud Data Center Fire*, UptimeInstitute, Mar. 28, 2021, <https://journal.uptimeinstitute.com/learning-from-the-ovhcloud-data-center-fire>; *Battery Storage Fire Safety Roadmap*, Electric Power Research Institute (2021) <https://www.epri.com/research/programs/053125/results/3002022540>.

⁵² Fredrik Larsson et al., *Toxic Fluoride Gas Emissions from Lithium-ion Battery Fires*, 7 Scientific Reports 10018 (2017), <https://doi.org/10.1038/s41598-017-09784-z>; Perrine Ribière et

G. AI data centers rely on hazardous electronic waste that risks the health and safety of nearby communities and the environment.

As mentioned above, these facilities rely heavily on different battery technologies, “which also happen to be one of the most significant hazardous waste streams in a facility.”⁵³ Indeed, researchers predict a thousand-fold increase in hazardous electronic waste from hyperscale AI data centers.⁵⁴ This hazardous electronic waste includes chemicals such as sulfuric acid, lead, cadmium, refrigerants, and mercury.⁵⁵

al., *Investigation on the Fire-Induced Hazards of Li-ion Battery Cells by Fire Calorimetry*, 5 Energy & Env’t Science 5271 (2011), <https://pubs.rsc.org/en/content/articlehtml/2012/ee/c1ee02218k>; Peter J. Bugryniec et al., *Review of Gas Emissions from Lithium-ion Battery Thermal Runaway Failure—Considering Toxic and Flammable Compounds*, 87 J. Energy Storage 111288 (2024), <https://www.sciencedirect.com/science/article/pii/S2352152X24008739>; Christiane Essl et al., *Comprehensive Hazard Analysis of Failing Automotive Lithium-Ion Batteries in Overtemperature Experiments*, 6 Batteries 29 (2020), <https://www.mdpi.com/2313-0105/6/2/30>; Byoungchul Kwon et al., *Evaluating Fire and Smoke Risks with LithiumIon Cells, Modules, and Batteries*, 9 ACS Energy Letters 5319 (2024), <https://pubs.acs.org/doi/10.1021/acsenenergylett.4c02480>; *Integrated Science Assessment for Particulate Matter*, EPA (2019), <https://www.epa.gov/isa/integrated-science-assessment-isa-particulate-matter>; *Toxicological Profile for Flourides, Hydrogen Fluoride, and Flourine*, ATSDR (2003), <https://www.atsdr.cdc.gov/toxprofiles/tp11.pdf>; *Toxicological Profile for Carbon Monoxide*, ATSDR (2012), <https://www.atsdr.cdc.gov/toxprofiles/tp201.pdf>; *WHO Global Air Quality Guidelines: Particulate Matter (PM2.5 and PM10), Ozone, Nitrogen Dioxide, Sulfur Dioxide, and Carbon Monoxide*, World Health Org., Sept. 22, 2021, <https://www.who.int/publications/i/item/9789240034228>.

⁵³ *What Hazardous Materials are Found in a Data Center*, MCF Environmental Services.

⁵⁴ Fred Schwaller, *E-waste from AI Computers Could Escalate Beyond Control*, DW, Oct. 28, 2024, <https://www.dw.com/en/e-waste-from-ai-computers-could-escalate-beyond-control/a-70619724>.

⁵⁵ *AI Has an Environmental Problem. Here’s What the World Can Do About That*, UN Env’t Programme, Nov. 13, 2025, <https://www.unep.org/news-and-stories/story/ai-has-environmental-problem-heres-what-world-can-do-about>; *Artificial Intelligence (AI) End-to-End: The Environmental Impact of the Full AI Life Cycle Needs to be Comprehensively Assessed*, UN Env’t Programme, Sept. 21, 2024, <https://wedocs.unep.org/rest/api/core/bitstreams/07b3c8fc-bd30-4b92-b5f4-d665e927b59d/content>.

H. Project Tango will harm surrounding waters, the Loxahatchee National Wildlife Preserve, and the Florida Everglades.

Project Tango is remarkably close to the Arthur R. Marshall Loxahatchee National Wildlife Refuge. The Refuge is highly vulnerable to external disturbances and even a minor change in water quality can reap significant harm across the ecosystem.

And the L-8 Canal is part of a hydrologically connected system that conveys water from the northern to the Everglades. It is a vital conduit between these two systems, ensuring that water can and does make it to the Southern Everglades system.

Pollutants, altered flows, or thermal impacts (from either water discharges or the general heat island effect surrounding data centers) generated at Project Tango could have a direct and immediate pathway into the Refuge and broader Everglades system. This pollution would include the water pollution discussed above as well as stormwater runoff from extensive impervious surfaces that can carry nutrients, heavy metals, and heat into connected waterways. The Everglades is uniquely sensitive to these changes and even small inputs from nearby heavy industrial uses can trigger ecosystem-wide impacts, including algal growth, habitat degradation, and loss of native species.

Project Tango would also likely harm the Everglades by amplifying air pollution in this sensitive area and introducing continuous industrial disturbance into a landscape that has been protected specifically to maintain natural soundscapes for wildlife. Constant lighting and twenty-four-hour industrial operations would also further degrade the natural conditions of nearby Everglades habitat, disrupting nocturnal species and altering critical behavioral patterns such as nesting and migration.

PROJECT HISTORY

I. In 2016, the Board approved an employment center consisting of warehouses and a “server farm,” not an AI data center.

In 2016, PBA Holdings approached the Board with a request to develop “an **employment center**” (“EDC”) on this property as a means to create economic opportunities for western Palm Beach County.⁵⁶ An employment center “is defined in the Comprehensive Plan as a center of economic activity consisting of **commerce, industry, and offices**, often accessible to transit, which is intended to generate significant employment opportunities.”⁵⁷ Indeed, PBA Holdings explicitly stated that Arden would “foster the creation of the EDC development.”⁵⁸

As Staff recognized in 2016, “the **more significant employment component of this project would arise from the proposed warehouses and light industrial uses**,” and not the traditional data center.⁵⁹ Therefore, the intention was to ensure that these warehouse and light industrial uses would be created to facilitate job creation in the Glades Area Protection Overlay (“GAPO”).⁶⁰ As a result, the approved Master Plan indicated 2,020,000 square feet of warehouse, accessory office, and uses permitted in an EDC Multiple Use Planning Development (“MUPD”) and a Final Site Plan with 1,814,000 square feet of warehouse.⁶¹

The application also sought to develop a large-scale traditional “data center or computer ‘server farm.’”⁶² The Final Site Plan provided for **206,000 square feet of data information and processing**.⁶³ PBA Holdings indicated that this traditional data center was intended to “provide information technology infrastructure for single or multiple commercial or government clients.”⁶⁴

⁵⁶ Palm Beach County Zoning Application Staff Report, Central Park Commerce Center, LGA 2016-005, at 6 (Jan. 27, 2016) [hereinafter “Jan. 2016 Staff Report”].

⁵⁷ *Id.* (emphasis added).

⁵⁸ *Id.* at E-9. *Accord id.* at E-10 (“[D]evelopment would allow for job opportunities to service not only the forthcoming 2,000 homes within the PUD [Arden], but will also provide opportunities for the Tri-Cities (Belle Glade, Pahokee & South Bay) area to obtain access to jobs.”).

⁵⁹ *Id.* at 13 (emphasis added). *Accord id.* at 18 (“Staff concurs with the applicant’s assessment that the proposed amendment could help to address the lack of employment opportunities in the CWC, near the location identified in the Sector Plan for a large-scale employment center.”).

⁶⁰ *Id.* at 8.

⁶¹ Palm Beach County Zoning Application Staff Report, Project Tango, DOA/ZV-2025-01602, at 1 (Dec. 10, 2025) [hereinafter “Dec. 2025 Staff Report”].

⁶² Jan. 2016 Staff Report at 6.

⁶³ Dec. 2025 Staff Report at 1.

⁶⁴ Jan. 2016 Staff Report at 6.

Therefore, the Board initially approved PBA Holdings to develop a small, traditional data center, **not a hyperscale AI data center**. Nor could the Board have implicitly approved a hyperscale AI data center because **they did not exist yet**.⁶⁵

II. In January 2025, the Board approved a rezoning of the adjacent Special Agricultural zoning district into the MUPD Master Plan.

On January 30, 2025, nearly ten years after the original proposal, the Board increased the overall size of the MUPD by rezoning the adjacent Special Agricultural (“SA”) zoning district, a 64.46 acre plot of land that has existing concrete and asphalt batch plants on site.⁶⁶ There was no change to the original approval for 491,749 sf of light industrial uses and 2,786,577 sf of warehouse uses.⁶⁷ It still only contemplated 206,000 sf for a data processing center.⁶⁸ Indeed, “The proposed amendment does not include a change in uses or square footage at this time.”⁶⁹ It again emphasized that “[t]he requests will allow for additional employment generating development to provide for increase employment opportunities for the residents of the western communities.”⁷⁰

III. In November 2025, PBA Holdings sought to amend its Master Plan to authorize an entirely new hyperscale AI data center use.

In November 2025, however, PBA Holdings came back to the Board with a completely different project: a hyperscale AI facility called Project Tango.⁷¹ The developer explained that it shifted visions for the property because “**recent technological breakthroughs and chip advances** have now made it feasible to deliver a **modern Hyperscale AI Data use** on the property, **which necessitates the need to amend the master plan**.”⁷² They therefore acknowledged that they were taking an opportunity to shift their plans to explore different economic opportunities in AI technology, and therefore abandoning their earlier plans for a server farm and warehouse complex.

⁶⁵ *Data Centers 101: The Evolution of DCs Over Time*, Impact Capital Partners.

⁶⁶ Palm Beach County Zoning Application Staff Report, Central Park Commerce Center MUPD, PDD/DOA-2024-00309, at 1 (Jan. 30, 2025) [hereinafter “Jan. 2025 Staff Report”].

⁶⁷ *Id.* at 5.

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ *Id.* at 9.

⁷¹ Dec. 2025 Staff Report at 1.

⁷² *Id.* at 12.

Table 2. Comparing PBA Holding's 2016 Approval with its Current Request

	2016 Approval	2025 Request
Project Name	Central Park Commerce Center	Project Tango
Data Center Size	206,000 square feet	1,792,000 square feet (or 1,032,000 square feet ⁷³)
Data Center Description	“Server Farm” ⁷⁴ “[I]nformation technology infrastructure for single or multiple commercial or government clients.” ⁷⁵	“[A] modern Hyperscale AI Data use” ⁷⁶
Energy Needs	Likely <50 MW of power ⁷⁷	600+ MW of power
Cooling System	Likely CRAC ⁷⁸	Proposed closed-loop cooling system (though originally contemplated evaporative cooling)
Warehouse Size	2,786,577 square feet	1,900,000 square feet

The Board was originally scheduled to hold a hearing on this proposed Master Site Plan on the December 10, 2025, consent agenda. After members of the Arden community learned of the project and joined together in opposition to the project, the Board postponed the formal quasi-judicial hearing until April and ordered PBA Holdings to conduct a sound study on the impacts the AI data center project would have on the surrounding communities. PBA Holdings then voluntarily postponed the hearing until July 15, 2026.

In the meantime, the other landowners have now sued PBA Holdings, claiming that PBA Holdings does not have the right to move forward with the proposed Master Plan amendment.⁷⁹ The Board should also postpone, withdraw, or deny this application until a Court issues a final decision in the ongoing litigation amongst the landowners.⁸⁰

⁷³ Michael Hoffman, *Reworks Made for Project Tango Data Center Plan after Months of Pushback from Palm Beach County Residents*, Fox WFLX29, Mar. 18, 2026, <https://www.wflx.com/2026/03/18/reworks-made-project-tango-data-center-plan-after-months-pushback-palm-beach-county-residents>.

⁷⁴ Jan. 2016 Staff Report at 6.

⁷⁵ Jan. 2016 Staff Report at 6.

⁷⁶ Dec. 2025 Staff Report at E-10.

⁷⁷ See Attachment B (detailing energy needs for traditional data centers of similar sizes).

⁷⁸ See *id.* (detailing cooling technologies for traditional data centers of similar sizes).

⁷⁹ Joel Engelhardt, *Dueling Owners Go to Court over Project Tango*, Stet News, June 15, 2026, <https://stetnews.org/2026/06/15/dueling-owners-go-to-court-over-project-tango>.

⁸⁰ See Letter from John Eubanks, Arden Homeowners Association, to Palm Beach County Board of County Commissioners, June 25, 2026.

LEGAL ARGUMENTS FOR DENIAL

The Board should not allow PBA Holdings to transform its originally contemplated multi-use warehouse complex and server farm into a heavy industrial AI data center that would harm the surrounding environment, community in Arden, and students of Saddle View Elementary School. PBA Holdings is not seeking to increase the square footage or intensity of the traditional data center use that the Board previously authorized. Instead, PBA Holdings is seeking to approve an entirely new use on the site, one that cannot be approved under the zoning restrictions in place.

PBA Holdings' application must be denied because it is inconsistent with the County's Comprehensive Plan and local land use regulations, because an AI data center is (1) not a "light industrial use," (2) not "data information and processing," and (3) not compatible with an EDC, GAPO, or MUPD designation.⁸¹

I. Project Tango (and any other AI data center) is not compatible with land zoned for "light industrial" uses because it will have significant effects to the surrounding environment and nearby communities.

Because Project Tango (and any AI data center) will harm Arden, Saddle View Elementary School, and the surrounding environment, it cannot be found compatible with the land use designation for "light industrial" uses. Instead, AI data centers are compatible with heavy industrial uses, which are prohibited in GAPO, EDC, and MUPD. The Board must therefore deny PBA Holdings' application for a Master Plan amendment.

Where a facility will have significant impacts to the surrounding area, it cannot be classified as a "light industrial" use. Pursuant to the County's Comprehensive Plan, a "Light Industrial" use is "not likely to cause undesirable effects, danger or disturbance upon nearby areas and typically does not create negative impacts on immediately adjoining uses."⁸² "Light Industrial" uses "typically do not cause or result in the dissemination of dust, smoke, fumes, odor, noise, vibration light, or other potentially objectionable effects beyond the boundaries of the lot on which the use is conducted."⁸³ "Examples of Light Industrial uses include: storage, warehouse, research, laboratories, dispatch, landscape service, flex space, media production, and light manufacturing and processing."⁸⁴

⁸¹ The Board could demand that PBA Holdings resubmit its application pursuant to ULDC § 2.B.4.E because the applicant changed its project by more than thirty percent. *See* Letter from John Eubanks, Arden Homeowners Association, to Palm Beach County Board of County Commissioners, June 26, 2026.

⁸² Palm Beach County Comprehensive Plan Policy 2.2.4-d at 79, <https://discover.pbc.gov/pzb/planning/PDF/ComprehensivePlan/ComprehensivePlan.pdf> [hereinafter "PBC Comp. Plan"].

⁸³ *Id.*

⁸⁴ *Id.*

By contrast, the County’s Comprehensive Plan defines “Heavy Industrial” use as those that “may cause or result in the dissemination of dust, smoke, fumes, odor, noise, vibration, light, or other potentially objectionable effects beyond the boundaries of the lot on which the use is conducted.”⁸⁵ This language clearly explains that where a facility “may cause or result” in harm to surrounding areas, it is a heavy industrial use.

Project Tango aligns with the definition of “heavy industrial use” because it will **likely cause “objectionable effects,”** including air, water, noise, heat, and hazardous electronic waste pollution. This hyperscale AI data center will also **likely impose “danger or disturbance upon nearby areas.”**⁸⁶ As described in detail in Factual Background Section III, the harmful effects of AI hyperscale data centers on the surrounding environment and nearby communities are universally experienced and well documented.⁸⁷ And as Factual Background Sections IV and V demonstrate, Project Tango is no exception.

These impacts are particularly concerning because Project Tango is currently proposed in such close proximity to Arden, Saddle View Elementary School, Everglades restoration projects, and the Loxahatchee National Wildlife Refuge.

Project Tango therefore would require a “heavy industrial use” designation that is prohibited in EDC, MUPD, and GAPO designated areas. The Board must deny PBA Holdings’ application for a Master Plan amendment.

A. The harmful equipment necessary for the operation of Project Tango (and any other AI data center) cannot be considered “ancillary features.”

Seemingly to avoid this “heavy industrial” designation, PBA Holdings has attempted to frame the harmful equipment of the proposed AI data center as originating from “ancillary features,”⁸⁸ namely the cooling system, back-up generation, and electrical infrastructure needed to operate. This argument fails as a matter of clear legal interpretation.

As defined in the Merriam-Webster dictionary, “ancillary” means “having a subordinate, subsidiary, or secondary nature” or “serving as a supplement or addition.”⁸⁹ The term clearly does not cover integral parts of a single facility.

PBA Holding’s application concedes that **you cannot have a hyperscale AI data center *without* extensive power infrastructure, intensive cooling technologies, and extensive back-up generation.** As PBA says, “These ancillary features are **integral and are needed to power and cool the data center**, and their proposed location adjacent to data buildings is **required for**

⁸⁵ *Id.*

⁸⁶ PBC Comp. Plan Policy 2.2.4-d at 79.

⁸⁷ See Elan Justice Pavlinich, *The Dangers of Data Centers*, Env’t Health Project, Feb. 27, 2026, <https://www.environmentalhealthproject.org/post/the-dangers-of-data-centers>.

⁸⁸ Dec. 2025 Staff Report at E-10.

⁸⁹ “Ancillary,” Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/ancillary> (last visited June 26, 2026).

efficient operation.”⁹⁰ Therefore, these features are core to the AI data center itself, not “subordinate,” “secondary,” “subsidiary,” “supplemental” or “additional” features.

Notably, neither the Comprehensive Plan nor ULDC contemplate including necessary equipment as “ancillary features.” Instead, the Comprehensive Plan describes “ancillary landscaping”⁹¹ or “ancillary structures, such as detached one unit apartments/offices or garage apartments.”⁹² Similarly, the ULDC describes “ancillary structures such as fences, buffer walls, and guardhouses”⁹³ or “ancillary facilities associated with [a] railroad.”⁹⁴ Neither contemplate the “advanced cooling equipment, back-up generation, or water treatment facilities” as PBA Holdings attempts to describe here.

Therefore, PBA Holdings cannot avoid a heavy industrial designation for AI data center use by designating as “ancillary” all of the harmful infrastructure that is “needed” for the AI data center to operation.

II. Project Tango (and any other AI data center) is not compatible with the “data and information processing” use because that term never contemplated AI data center uses.

When the Board previously considered this proposal, PBA Holdings was clearly developing the Central Park Commerce Center to be a traditional data center, which may be classified as a light industrial data and information and processing facility.⁹⁵ Project Tango, by contrast, does not fit within this definition.

This is very apparent considering the history of this use designation. It was first added to the ULDC in 1992 with Ordinance 1992-020 (June 16, 1992). The initial definition read “use of an establishment for business offices of an industrial nature, including operations centers, mail processing, data processing and telemarketing centers.” At this time, “data processing” would have included traditional server farms, but *not* AI data centers, which did not yet exist.

Although the Board has amended the ULDC multiple times since 1992, it has never added language to include AI data center as falling under the term “data information and processing”:⁹⁶

- **Ordinance 2003-067:** Sets up the ULDC (2003)
- **Ordinance 2003-067 Supplement 8:** Adds the use of “flex space” (April 2010)

⁹⁰ Dec. 2025 Staff Report at E-10.

⁹¹ PBC Comp. Plan FLUE Policy 1.2.2-e, at 60.

⁹² PBC Comp. Plan FLUE Policy 4.74.5-b(2)(a), at 157.

⁹³ ULDC art. 1 § 1(D)(1)(a), at 5; *id.* art. 11(A) § 4(B)(2), at 941.

⁹⁴ *Id.* art. 18 § 4(C)(1), at 1211.

⁹⁵ Jan. 2016 Staff Report at 6.

⁹⁶ See Attachment D.

- **Ordinance 2003-067 Supplement 20:** Maintains the same definition from 2010 (May 2016)
- **Ordinance 2003-067 Supplement 21:** adding exclusions for “Business or Professional Offices; computer-related Retail Sales establishments; and Personal Services and Medical or Dental Offices” (May 2017)
- **Ordinance 2003-067 Supplement 32:** Maintains the same definition from 2017 (October 2025)

And the ULDC today still 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 a **campus-style development**, and not frequented by the general public.”⁹⁷

As originally contemplated, the Central Park Commerce Center would have been “predominantly” warehouse use with a traditional server farm attached.⁹⁸ The makeup of the original proposal would therefore seem to fall under a “campus-style development” with “business offices of an industrial nature.”

Project Tango, by contrast, no longer falls under “data information and processing.” Instead, as Staff recognized, “changing industry design and innovations associated with the **unique** use of Data Center.”⁹⁹ An AI data center is not a business office of an industrial nature, and it is not an industrial complex or a telemarketing center. Instead, it is a facility that is engaged in manufacturing data, images, videos, and text using AI computing technology (and it takes very large, resource heavy machinery to do that). As detailed in Factual Background Sections III–V, the AI data center’s machinery and equipment create excessive heat, noise, and light as well as produce dirty water.

Project Tango is therefore more comparable to other “Heavy Industrial” uses like “heavy manufacturing.”¹⁰⁰ The ULDC explains that heavy manufacturing “causes or results in the dissemination of dust, smoke, fumes, odor, noise, vibration, light, or other potentially objectionable effects beyond the boundaries of the lot on which the use is conducted.”¹⁰¹ As explained above, hyperscale AI data centers are “engaged in manufacturing processes utilizing flammable, hazardous, or explosive materials” and “involve hazardous or commonly recognized offensive conditions.”¹⁰² They are therefore better suited for classification as “heavy manufacturing” than they are for classification of “data information and processing.”

⁹⁷ PBC ULDC Art. 4 at 94.

⁹⁸ Jan. 2016 Staff Report at 14.

⁹⁹ Dec. 2025 Staff Report at 13.

¹⁰⁰ PBC Comp. Plan Policy 2.2.4-d at 79.

¹⁰¹ PBC ULDC Art. 4 at 96.

¹⁰² *Id.*

The Board should therefore deny PBA Holding’s application for a Master Plan amendment where an AI data center would be improperly classified as “data information and processing.”

III. Project Tango (and any other AI data center) is not compatible with an EDC designation because it does not provide employment opportunities.

An AI data center cannot be compatible with an EDC designation because these facilities have been shown to provide little to no economic development or job opportunities within their site locations.

As explained in the Comprehensive Plan, an EDC “is intended to **accommodate employment opportunities**, research parks, and Employment Centers,”¹⁰³ meaning “[a] center of economic activity within consisting of commerce, industry, or offices, often accessible to transit, which is **intended to generate significant employment opportunities**.”¹⁰⁴

When the Board approved the Central Park Commerce Center, it made this purpose explicit. As the January 2016 Staff Report states, “[D]evelopment would allow for job opportunities to service not only the forthcoming 2,000 homes within the PUD [Arden], but will also provide opportunities for the Tri-Cities (Belle Glade, Pahokee & South Bay) area to obtain access to jobs.”¹⁰⁵ Moreover, “Staff concur[ed] with the applicant’s assessment that the proposed amendment could help to address the lack of employment opportunities in the CWC, near the location identified in the Sector Plan for a large-scale employment center.”¹⁰⁶

However, an AI data center does not produce jobs. As a study from Michael J. Hicks showed, in Texas, where rampant data center development has occurred, there was little to no effect on employment opportunities.¹⁰⁷ Another report supports this conclusion, showing that Virginia data centers “generate just 1 permanent job for every \$13 million invested.”¹⁰⁸ And “newly built data centers are employing even fewer people per invested dollar”: “1 direct, permanent job for every \$54 million invested.”¹⁰⁹

Indeed, PBA Holdings has conceded as much. It explained that it required a parking variance precisely because “[t]he proposed data center will have a much lower employee count

¹⁰³ PBC Comp. Plan FLUE Policy 2.2.4-c(2) at 121.

¹⁰⁴ *Id.* Comp. Plan Definitions at 13.

¹⁰⁵ Jan. 2016 Staff Report at E-10.

¹⁰⁶ *Id.* at 18.

¹⁰⁷ Michael J. Hicks, *Data Centers and Local Job Creation: Some Preliminary Causal Estimates from Texas*, *The Country Economist*, Nov, 10, 2025, <https://michaeljhicks.substack.com/p/data-centers-and-local-job-creation>.

¹⁰⁸ Food & Water Watch, *Artificial Jobs: The Illusion of Big Tech’s Data Center Employment Claims* (Jan. 2026), https://www.foodandwaterwatch.org/wp-content/uploads/2026/01/RB_2601_DataCenterJobs.pdf.

¹⁰⁹ *Id.* at 2.

than what the ULDC anticipates, as it will house a ... low number of employees.”¹¹⁰ And Staff repeatedly agreed, stating that this AI data center will “not require an extensive number of employees for the development to operate.”¹¹¹

Therefore, the proposed AI data center is incompatible with an EDC use because it will not provide “significant employment opportunities.” The Board must deny PBA Holdings’ request.

IV. Project Tango (and any other AI data center) is not compatible with a GAPO designation because it will be detrimental to conservation areas and Everglades restoration programs and projects.

The proposed Master Plan Amendment is inconsistent with the GAPO designation of the subject property. The purpose of the GAPO is to protect the Everglades Agricultural Area (“EAA”) from encroachment from “**uses that will be detrimental to the viability and continuity of agricultural activities, existing and future conservation areas, and Everglades restoration programs and projects.**”¹¹²

Again, light industrial uses like traditional server farms may be appropriate because they have minimal to no impacts beyond the property line. Indeed, in their January 2016 report, staff even explained that heavy industrial uses are precluded on the plot in question “given the site’s close proximity to the L-8 canal ... as well as the C-51 canal and the water conservation stormwater treatment areas further to the south.”¹¹³

Here, however, the proposed AI data center will likely have significant detrimental effects on conservation areas and Everglades restoration programs and projects. *See* Factual Background Sections IV–V.

Therefore, the Board must deny this application as inconsistent with the County’s Comprehensive Plan and land use regulations.

V. Project Tango (and any other AI data center) is not compatible with an MUPD designation because it will have adverse impacts on adjacent residential uses.

As explained in detail above, Factual Background Sections III–V, AI data centers like project tango have significant adverse effects to adjacent communities and the surrounding environment. However, the County’s Comprehensive Plan makes clear that an MUPD must “**protect adjacent residential uses from potential adverse impacts.**”¹¹⁴ This project is therefore incompatible with an MUPD designation and must be denied.

¹¹⁰ Dec. 2025 Staff Report at 13.

¹¹¹ *Id.*

¹¹² PBC Comp. Plan FLUE Objective 1.8 at 54.

¹¹³ *Id.*

¹¹⁴ PBC Comp. Plan Policy 4.4.7-b at 115.

CONCLUSION

As explained in detail above, PBA Holdings' application for a Master Site Plan is due to be denied because it is inconsistent with the County's Comprehensive Plan and local land use regulations. An AI data center cannot be classified as "data information and processing," cannot be classified as a "light industrial use," and cannot be found compatible with an EDC, GAPO, and MUPD designation. AI data centers cause significant harms to surrounding communities and the environment and produce very few employment opportunities.

We therefore respectfully request that the Board deny PBA Holdings' application for a Master Site Plan amendment to include the Project Tango AI data center because

- AI data centers do not qualify as "light industrial uses;"
- AI data centers do not qualify under "data information and processing;" and
- AI data centers are incompatible with MUPD, EDC, and GAPO designations.

We look forward to presenting these arguments and answering any questions from Zoning and the Board on the July 2, 2026, and July 15, 2026 hearings. Please feel free to contact me, creichert@earthjustice.org, if you have any questions.

Sincerely,



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