CEDS Data Center Permits, Approvals, Issues, Safeguards & Strategy Options Checklist

This checklist provides an introduction to the permits and other approvals a data center may require along with issues (impacts) that may be resolved through various safeguards. The strategy options that have been most successful in winning safeguards are presented along with those that stopped data centers so poorly planned that area residents could not be fully safeguarded. Clicking on the blue text in the pdf checklist version will take you to additional guidance.

With our more than 40 years of helping people protect their homes from development impacts, CEDS has found inexpensive, yet reliable methods for assessing impacts and the degree of which permit-approval required findings are met. We've helped people protect their homes through all the permits-approvals listed below. Frequently CEDS methods allow people to provide decision makers with the proof needed to win without having to engage an attorney or an expensive expert witness. However, when one is needed there are nearly 300 in the CEDS nationwide Good Attorneys network. We can also help you find no-cost/low-cost experts.

For further information see the CEDS publication *Key Data Center Zoning Ordinance Components* and the CEDS *How to Protect Your Home from Data Center Impacts* webpage. Forming a strategy to prevent data center impacts requires considerable research. A large portion of the research how-to is described in CEDS publications and other webpages.

If you lack the time to carry out the research on your own then consider retaining CEDS to do the research for you. We'll verify potential impacts, determine which permits-approvals provide the best opportunity for preventing each, recommend strategy options to safeguard you and your neighbors, and help you carry out each. Our fee is a fraction of what you would pay an attorney or a conventional consulting company while our success rate is far higher. If you have any questions contact CEDS at 410-654-3021 or Help@ceds.org. Our advice is always available free of charge to those seeking to protect their homes, though our answer to a question may frequently be "we won't know until research is completed" since each data center case is unique.

Permits, Approvals, Issues, Safeguards & Strategy Options

Air Pollution Discharge Permit: The particulates and other air pollutants released from data center backup diesel generators or gas-fired power plants can affect the health of those living near and far. An Air Discharge Permit is usually issued by a State agency, though local governments should have the authority to require measures that reduce data center air pollution emissions. A Health Impact Assessment (HIA) should be required, though they are seldom performed - except in a few states - for data centers. The HIA should prove that data center air pollution emission limits and control measures will safeguard the health of those living nearby (within a ¼ to ½ mile) as well as those throughout the region. Requiring generators meeting USEPA Tier-4 emission standards can greatly reduce, but not necessarily eliminate, health impacts.

Annexation: This is the process by which adjoining land is incorporated into a town or city. If the annexation only benefits a few property owners at the expense of the majority of residents then defeating a flawed annexation is more likely. Annexation hearings provide an excellent opportunity to set the stage for winning conditions that resolve data center impacts.

Appeals: A decision to approve just about all permits-approvals can be appealed. If the appeal is to a local Board of Appeals or local elected body the likelihood of success is far greater than if it is heard by a State court. In fact, it appears that less than 1% of appeals to the courts are successful whereas those to a Town Council, County Commissioners, Board of Appeals or other local body frequently result in conditions that resolve impacts and occasionally denial of a previously approved permit.

Attorneys: Many data center cases are won without an attorney, though access to legal advice and representation always helps. Most victories result from winning the support of local elected officials by demonstrating many area residents (voters) agree with your position, that your position is fact-based position, and calling for either highly effective safeguards or nixing a poorly planned project. Legal action may be needed to postpone final approval until this political-science based strategy can produce victory. Occasionally an independent attorney is also needed to assure officials that they have the authority to require safeguards or even deny approval. When an attorney is needed there are nearly 300 in the CEDS nationwide Good Attorneys network.

Buffers (Aquatic Resource): A vegetated (forest) buffer of at least 100 feet should be maintained between the limits of disturbance and streams, rivers, lakes, and wetlands, especially if any are considered uniquely sensitive or important. If highly effective erosion-sediment control, stormwater, and other measures are combined with good buffers then little aquatic resource impact may result.

Building Permit: One of the difficulties with data centers is a lack of information about cooling systems, generators, and other components. The building permit process can provide an opportunity to gain this information. However, the building process usually provides minimal opportunity for public participation or appeals.

Clearing Permit: Approval to clear trees and other existing vegetation from a site may be one of the earliest permits granted. This permit is usually issued so soil borings, percolation tests, and other onsite investigations can be conducted. The permit should not allow clearing in buffer areas or removal of sufficient forest and other vegetation to cause aquatic resource or other ecological harm.

Comprehensive Land Use Plan: Sets forth how a town, city or county should develop for the next decade or two with the goal of preserving and enhancing quality of life for current and future residents. Comprehensive plans seldom consider data centers despite the fact that few, if any, land uses have the potential for as much good and harm as data centers, especially hyperscale and campus proposals. Before a zoning change or annexation is considered the pros and cons of data centers should be thoroughly studied through a comprehensive plan amendment process, the result of which must be a set of goals and objectives for maximizing benefits while minimizing harm, then regulations requiring that each be met must be adopted through a six- to twelve-month process. An example of a CEDS analysis proving the need for a data center comprehensive plan amendment is posted at: https://app.box.com/s/besge81qic5pvuolxh5rnoe1vjhemvno.

Conditional Use Permit: A CUP may be the best opportunity next to rezoning and annexation for preventing approval of a poorly planned data center since a public hearing is usually held where impacts must be considered, conditions can be required to resolve impacts, and unfavorable decisions may be appealed to a local elected body where success is far more likely than in the court system. A CUP is closely related to a Special Exception and Special Use Permit.

Construction Access & Route: During the 6- to 18-month data center construction period there could be a large volume of diesel and other heavy truck traffic noise, air pollution, and other impacts. Truck traffic must not pass through or near neighborhoods or other sensitive areas like schools, hospitals, day care centers, or assisted living facilities.

Cooling Water Contaminants: A number of chemicals may be added to data center cooling water to prevent corrosion, fouling, and other issues. These contaminants may include difficult to remove PFA forever chemicals that may pass through treatment systems to contaminate receiving waters.

Data Center Monitoring: Announcing during the review process that you intend to monitor a proposed data center for noise, air pollution, excessive water use, and other impacts can increase the likelihood that highly effective measured are required, implemented, then fully maintained. If a data center is already under construction or has opened then initiating monitoring using the inexpensive, yet reliable methods recommended at the following CEDS site can help safeguard you and your neighbors: https://ceds.org/data-center-monitoring/

Development Rights Agreement: A DRA sets forth the terms and conditions under which a data center may be built. It usually requires approval by the local elected body which increases the likelihood of winning effective safeguards. The DRA can be an important opportunity to set limits and require measures to prevent impacts. Companion agreements may pertain to Community Reinvestment, School Compensation, and others.

Electricity: The Regional Transmission Organization (RTO) should be required to certify that the power required by the data center can be provided without jeopardizing or driving up costs for other users.

Erosion & Sediment Control: During the 6- to 18-month data center construction period dozens to hundreds of acres can lay bare and exposed to the erosive forces of wind and rain. Without highly effective soil erosion and sediment control measures a single construction site can damage up to three miles of downstream waters with recovery taking as much as a century. Plus the wind borne dust can cause respiratory problems for area residents. Federal and many state or local laws require that all exposed soils be protected with mulch and grass once the initial clearing-grading phase ends and earth-moving equipment is no longer active along with perimeter settling ponds. These soil stabilization measures prevent much of the air and water pollution. Few sites fully comply with these laws. A data center must not be approved until a system is in place that attains good compliance. A CEDS erosion-sediment pollution impact analysis is at: https://app.box.com/s/hwp3x71cjyf6polffz6nk5t5mpmqfwdr. CEDS erosion-sediment control guidance publications and presentations are available.

Expert Witnesses: It helps to have people with degrees or other credentials who can assure decision-makers that data center concerns are based on facts and not just a knee-jerk reaction. Frequently CEDS can help find no-cost experts among those in the one- or two-mile area of concern extending from a proposed data center site. There are usually a number of medical professionals (doctors, nurses, etc.) living in the area who can review the scientific studies on CEDS webpages then testify at a hearing about the facts supporting concerns and the measures decision-makers should require to resolve impacts. When no-cost experts are not available, we can help you find professionals who lack the biases of those making a living by serving the development industry and are frequently less expensive.

Fire Prevention: If a data center will include very tall buildings or other unusual features then the local fire department may require additional equipment and training. Should a data center employ a Battery Energy Storage System (BESS) then the local government must ensure that the system and local fire services meet the requirements set forth in National Fire Protection Association 855, *Standard for the Installation of Stationary Energy Storage Systems (2026)* which is summarized in the NFPA *Energy Storage Systems Safety Fact Sheet*. The applicant must be required to provide the initial and ongoing funds required by local fire departments to obtain the equipment and training essential to ensuring a data center BESS remains safe.

Floodplain Encroachment: Filling should not occur within the flat floodplain areas adjoining streams, rivers, or tidal waters and shown on FEMA or other maps. First floor building levels are usually required to be at least one foot above the hundred year flood elevation. A gross rule of thumb is that the 100-year flood level of a stream or river reaches an elevation twice the depth of the channel from bed to bank top. The stormwater from a data center complex should not cause flood water levels to increase at downstream buildings, bridges, or other structures.

Forest & Tree Preservation: Forest provides many important benefits. A number of local and state governments have enacted forest conservation and tree preservation laws. Aquatic resources are healthiest when at least 50% of the watershed is in forest and may become severely degraded when it drops to 30%.

Grading Permit: Many local governments require an approved erosion-sediment control plan, grading plan, and stormwater management plan before a grading permit can be issued. If any of these plans fail to fully safeguard area residents and aquatic resources then contesting grading permit issuance should be considered, though it's always easiest to convince decision-makers to require highly effective plans *before* a permit decision is made.

Groundwater Recharge Area Protection: A recharge area is the portion of land when rain or snow melt enters the soil to replenish a groundwater aquifer. Many localities prohibit development that may release contaminants, such as those in data center cooling waters, in a recharge area. Extensive data center impervious areas may reduce rain-snow melt infiltration sufficiently to reduce groundwater inflow to nearby streams and wells.

Health Impacts: A data center may pose a threat to the health of nearby and regional residents due to air pollution emitted from backup diesel generators, gas- or coal-fired power plants, and contaminants carried in evaporative mists. Noise from some cooling systems and backup diesel generators can also affect health. If cooling water contaminants are released to ground or surface water then a possibility exists of adverse health effects. A CEDS analysis of data center health impacts is at: PA Middlesex Data Center.

Highway Access Permit: If a data center requires a connection to a State road then a highway access permit may be required from a State agency. The most likely issue at a new intersection is inadequate *sight-distance*. Drivers waiting at the proposed data center access point should be able to see vehicles approaching from all directions when they are at least ten seconds away.

Historic & Cultural Resources: Determine if any National Register of Historic Places sites or those listed on State registers are on or within view of a data center site. Most local governments and states require protecting the integrity of historic or cultural resources from the visual or disturbance impacts of proposed development.

Independent Studies & Applicant Funding: Rather then relying on studies conducted by consultants engaged by a data center applicant, local governments should hire their own experts with funds provided by the applicant. These independent studies are likely to be more objective, less biased. Independent studies are particularly important for issues having the greatest impact such a noise, air pollution-health impacts, and excessive water use.

Jobs: When compared to other industrial uses, data centers provide relatively few permanent jobs once the 6- to 18-month construction period ends. The following text appeared in *Data Centers in Virginia*: "For example, several data center representatives indicated that a typical 250,000-square-foot data center may have approximately 50 full-time workers (one employee per 5,000 square feet versus one employee per 650 square feet for some distribution centers). About half of these workers are likely direct employees of the data center company (or for colocation data centers, direct employees of the tenant). These workers include facility managers, engineers, data technicians, and facility maintenance staff. The other half are contract workers, including electricians, pipefitters, and security personnel who work full-time at the facility."

Landscape Plan: The intent of this plan is to show how trees, shrubs, other vegetation, earth berms, etc. will reduce the visual impact of buildings, parking lots, and roads. Because data center building are usually at least 30 feet high and may exceed a hundred feet, they tend to be especially difficult to screen them from view. This is why many local governments reduce the potential for visual and other impacts by requiring that data center buildings, substations, etc. be setback at least 200- to 1,000 foot from property lines, particularly when adjoining residential areas.

Lighting Plan: The glare from poorly designed exterior lighting can make life unpleasant for nearby residents and reduce our enjoyment of the night sky. A lighting plan should show that by limiting the height of well-shielded fixtures light will not trespass beyond site boundaries. Lighting should also conform to International Dark Sky standards.

Local Elected Official Approval: Convincing local elected officials (mayor, council member, commissioner, etc.) to support your position is the action that resolves far more data center concerns than any other approach, including hiring an attorney and experts. CEDS has found that most officials are reluctant to approve a project when there is strong local opposition *AND* the opposition is based on facts not suspicions *AND* the impacts prompting opposition directly relate to required findings for data center permits and other approvals. Frequently, CEDS clients can win when all three factors are present without the expense of an attorney or paid expert witnesses.

Mobilizing Support: For advice on methods of mobilizing support, crafting your message, then showing decision-makers that there's substantial public (voter) support to ensure a data center does not cause harm, visit the CEDS *Mobilizing Public Support for Preserving Neighborhoods* webpage at: https://ceds.org/mobilize/

Moratorium: The strategy which has proven most effective in safeguarding communities from data center impacts is to call on local elected officials to enact a moratorium on data center rezoning, annexation, and other permit-approval processes while the comprehensive plan, zoning regulations and other local laws are amended with safeguards for gaining data center benefits without harm to area residents. A moratorium is needed because most town, city, and county laws inadequately address the impacts unique to data centers. Noise is a good example. Most noise ordinances address only A-weighted decibels (dBA). The low-frequency noise unique to data centers and a few other industrial activities falls below that of the dBA scale. Instead, noise ordinances must be amended with noise limits based on octave bands as well as C-weighted (dBC) sound. In some states a local government can prevent noise impacts if they do not have a local law on their books.

Noise: The noise emitted by some data center cooling systems and backup diesel generators has made life miserable for those living within a ¼ mile and may be an issue up to a mile distant. Air cooling systems tend to be the nosiest. Requiring generators meeting USEPA Tier-4 standards can cut noise in half. Requiring that generators be within full acoustic enclosures can further minimize noise. There must be local noise regulations for dBA, dBC, and octave band frequencies like those recommended in the CEDS *Key Data Center Zoning Ordinance Components* publication. A CEDS analysis of data center health impacts is at: PA Middlesex Data Center.

Onsite (Septic) Wastewater Disposal Permit: There are two primary sources of wastewater from a data center: cooling water and restroom waters. Of the two, cooling water has the greatest volume and is likely the most highly contaminated and difficult to treat. If either is to be disposed of via an onsite system releasing the wastewater to the soil then local health department and state agency approval will be required. A very thorough analysis by independent experts must show that onsite soils are suitable and nearby wells or streams will not be polluted.

Petition: A petition *can* be one of the best ways to show elected officials that a large number of area residents support your position. While the change.org petition platform used by many has won some data center battles, it is not the most effective. With change.org you only get the signer's name and maybe their town, state, and zip code. Few will explain why they signed, half or more of signers likely do not live in the area, and the ability to communicate with signers is very limited. With the platform CEDS uses signers provide name, street address, city, state, zip, phone number, email address, and why they are concerned about the data center. CEDS can then provide a report like that at the following link which our clients can use to show decision-makers the number of signers who live in their election district: OH Wilmington Data Center Petition Results. From the reasons given it is clear that signer concerns are based on facts, not supposition. Savvy officials can then see that signers care deeply enough about the issue that they'll likely remember who supported the community vs. the applicant come the next election, especially since we find subtle ways of letting officials know we'll remind voters who supported their position come the next election. With change.org there is no easy way to communicate with signers. It is for these reasons that CEDS petition platform may be ten times more effective.

Planning Board/Commission Approval: Usually a public hearing before a Planning Board or Commission takes place during the preliminary or concept phase of data center review. Sufficient detail to assess data center impacts is rarely provided at these early stages. You should insist that the information needed to assess all the relevant permits, approvals, issues, and safeguards in this checklist be provided before the hearing takes place. For a number of permits-approvals, the Planning Board makes a recommendation with the local elected Council serving as the final decision-maker.

Planned Unit Development: A PUD may be applied to a number of parcels allowing greater flexibility in the uses that may be developed. In some cases a PUD may negate underlying zoning and allow uses not otherwise permitted. However, one or more public hearings are usually required and may allow resolution of impacts and benefit enhancements not otherwise possible if just a site plan is required.

Property Line Setback: Setback distances between data center buildings and property lines should range from 200- to 1,000 feet. Some jurisdictions require an increase in the setback for taller data center buildings. The Better Data Center Project publication *Diesel Generators at Data Centers: Status, Impacts, and Protective Practices* recommends a 2,000 foot separation between data center backup diesel generators and schools, homes, as well as other sensitive sites.

Rare-Threatened-Endangered (RTE) Species: Check the U.S. Fish & Wildlife *IpaC Information for Planning and Consultation* site to learn of any Federal RTE species present on or near a data center site. Many states have a similar online database or will allow property owners to request if State RTE species are present on their land. Because they are rare, it is unlikely these species will be present. Nevertheless, if uniquely high quality waters or habitat are present then this research should be conducted. If you suspect RTE species may be present on the site then *DO NOT trespass!* Instead, request permission to search adjoining properties. If an RTE is found on adjoining land then Federal or State biologists will likely survey the data center site to determine if they are also present there. An example of a CEDS analysis that defeated a project impacting RTE species is posted at: TN Duck River Threatened Mussel Populations.

Sewer Access Permit: The local utility will usually require a sewer access permit before a data center can release cooling or other wastewater into the sewers carrying the flow to a treatment plant. It is vital to verify that the sewer and treatment facility has sufficient capacity. The USEPA ECHO database can allow you to determine if an existing wastewater treatment plant has a history of Clean Water Act violations that should be corrected before a large increase in volume is approved. The data center applicant-owner-tenants should be required to cover the costs for any necessary upgrades to the sewer system or treatment plant.

Site Plan: Most data centers will require a site plan that details how the project will be developed. It will usually include other plans: grading, erosion-sediment control, lighting-landscaping, stormwater management, etc. The site plan process usually allows for very little public participation or authority to require impact resolution conditions. Nevertheless, CEDS has resolved impacts by encouraging Site Plan reviewers to require more effective measures. It's always easier to resolve issues by working with decision-makers *before* a plan is approved.

Special Exception/Use Permit: An SE/SU may be the best opportunity next to rezoning and annexation for preventing approval of a poorly planned data center since a public hearing is usually held where impacts must be considered, conditions can be required to resolve impacts, and unfavorable decisions may be appealed to a local elected body where success is far more likely than in the court system. An SE/SU is closely related to a Conditional Use Permit.

State & Federal Decision-Makers: It is rare that a state or federal agency will deny a permit-approval if it nixes a data center. The reason is that land use decisions are the purview of local government. If a state or federal agency denied a data center permit then they may be accused of subverting local land use authority. However, sometimes state or even federal decision-makers may be more open to conditioning permits than local regulators.

Stormwater Management: The large amount of buildings, parking lots, and other impervious surface created by a data center project can increase the frequency and severity of flooding by a hundred fold and severely degrade aquatic ecosystems. Highly effective Best Management Practices (BMPs), like bioretention and infiltration, can greatly reduce and possibly negate the harm. However, CEDS research has shown that long term maintenance of stormwater BMPs is a problem with a 25% failure rate in some areas. Without very good BMPs a stream, lake, or wetland may become degraded when more than 8% of the watershed is covered by impervious surfaces. A data center campus may compound the impact by removing a large amount of forest or other native vegetation. CEDS stormwater management guidance publications and presentations are available. Here's a link to a CEDS analysis of stormwater impacts: CT Brook Trout Saved from Warehouse Stormwater Impacts.

Subdivision Plan: A subdivision plan may be required if a large tract of land is divided into individual lots for different data center buildings or other uses. Subdivision plan review and approval may entail requirements in addition to those for a Site Plan along with more opportunity for public participation.

Tax Revenue: Data centers may provide some truly impressive increases in tax revenue, mostly due to taxes on very expensive chips and other equipment. As States and local governments compete to attract data center by lowering taxes and other expenses, the revenue picture is no longer as rosy. A recent Good Jobs First post, noted "Reporting from Signal Ohio shows the data center sales tax exemption cost the state more than $1.5 billion in 2025, almost 12 times the state's $136 million forecast." A recent CEDS analysis included the following from a WTHR-TV report: "You pay sales tax. Some Indiana data centers didn't. Here's what we found Indiana just disclosed taxpayers are losing over $655 million through these exemptions, according to WTHR-TV. Most of that – 611 million combined for 2024 and 2025 – is going to one corporate giant: Amazon." By exempting a large data center campus from taxes, revenue for schools and other local services has decreased in some jurisdictions.

Traffic Impact: A data center building may only have 25 to a hundred employees which means relatively little traffic. A hyperscale data center or campus may have a dozen of buildings generating a large volume of traffic that may cause excessive congestion-delay on area roads. If the road system is already congested then the additional traffic could make it worse. Here are ways to get a sense of the degree of delay at signalized intersections and stop signs. If it frequently always takes more then one green cycle to get through an intersection at rush hour then congestion may be excessive. If it takes an average of 30 seconds or more to enter a road at a stop sign then congestion-delay may also be excessive. The most likely issue at a new access point is inadequate *sight-distance*. Drivers waiting at the proposed data center access point should be able to see vehicles approaching from both directions when they are at least ten seconds away. See CEDS *Traffic Impact Evaluation Procedures*.

Uniquely Sensitive-Important Aquatic Resources or Habitat: If a data center is proposed for a watershed supporting Rare-Threatened-Endangered (RTE) species then that certainly makes it uniquely sensitive and important. This would also be true if the data center impacts waters highly regarded for fishing, recreation, or as a public water supply. If a watershed is mostly in forest or other native vegetation then the waters as well as other wildlife habitat are likely highly sensitive. CEDS has found that as the sensitivity-importance of waters and habitat increases, the easier it is to win highly effective safeguards or poorly-planned projects will be nixed. An example of a CEDS analysis that defeated a project threatening uniquely important aquatic resources is posted at: https://app.box.com/s/9ge9oawla2tgfzvrgcya1peq99cb6rtk

Variance/Waiver: A variance or waiver is requested when a data center applicant would like to reduce setbacks or avoid other regulations. Usually a variance or waiver will only be granted if there are no reasonable alternatives like reducing the amount of development and the need for the variance/waiver is a result of conditions unique to the site and not of the applicant's making. Variances and waivers frequently require greater public participation opportunities such as a hearing.

Water Use: A large, hyperscale data center may use 1 to 5 million gallons of water per day, 75% of which may evaporate. A closed-cycle cooling system uses 70% less water. Other cooling options are available that use even less water. A data center must not be approved until independent studies show that the amount consumed will not harm other users of the same water source or damage stream, rivers, or other surface waters.

Water Appropriation Permit: A State permit is usually required if a data center will consume a large volume of ground or surface water. Frequently the U.S. Geological Survey and State geological surveys will have reports regarding the availability of ground and surface waters. A data center must not be approved until independent studies show that the amount consumed will not harm other users of the same water source or damage stream, rivers, or other surface waters.

Water Service Connection Permit: A permit from the local utility will usually be required if a data center intends to use water from the utility. The permit application can provide insights regarding the proposed cooling system which may not be available otherwise. Check with the local fire department to see if they have an opinion as to whether the volume of water requested by the data center applicant will affect the volume of water available at hydrants or other sources.

Water (Pollution) Discharge Permit: If a data center proposes a new release of pollution to ground or surface waters then a water discharge permit must be obtained from the State environmental protection agency. If the proposal is to discharge cooling waters to an existing treatment facility then verify that the plant has sufficient capacity and it can treat cooling water contaminants. The USEPA ECHO database can allow you to determine if an existing wastewater treatment plant has a history of Clean Water Act violations. If it does then the cause of the violations must be corrected before it receives additional wastewater.

Waterway Construction Permit: If a data center involves a bridge or other construction in or near a stream, river, wetland, or other waters then a permit may be required from a State environmental protection agency as well as the U.S. Army Corps of Engineers.

Wetland Permit: If a data center involves a bridge or other construction in or near a wetland then a permit may be required from a State environmental protection agency as well as the U.S. Army Corps of Engineers.

Zoning: Many data centers require a change in zoning which is **THE** best opportunity to convince local elected officials to deny approval for a poorly planned project or to set the stage for requiring highly effective safeguards. Usually the local Planning Commission holds a hearing and makes a recommendation to the local elected body (town, city, county council, commissioners, etc.). The local elected body will then hold their own hearing and is the final decision-maker.

Once local elected officials approve a zoning change it is very unlikely it can be reversed. This is why it's vitally important that you hold nothing back in your efforts to convince local elected officials (mayor, council member, commissioner, etc.) to support your position. Victory is usually won well before the final hearing begins.

Zoning *continued*:
CEDS has found that most officials are reluctant to approve a project when there is strong local opposition **AND** the opposition is based on facts not suspicions **AND** the impacts prompting opposition directly relate to required findings for data center permits and other approvals. The likelihood of success will increase further if you can show that you've tried to find measures to resolve impacts, but the project is so poorly-planned that resolution is not possible or the applicant refused to consider your suggestions. Frequently, CEDS clients can win when all three factors are present without the expense of an attorney or paid expert witnesses.

Petitions, especially those on the platform used by CEDS as described above *(see Petitions)*, are essential to educating area residents about fact-based concerns then mobilizing the standing room only turn out at hearings key to success. The CEDS platform makes it possible to produce a report like that at the following link which our clients can use to show decision-makers the number of signers (voters) who live in their election district: https://app.box.com/s/7tc9coyusuwb1v9xyc1pf1rkiukzv54d. From the reasons given it will be clear to elected officials that signer concerns are based on facts, not supposition. Savvy officials can then see that signers care deeply enough about the issue that they'll likely remember who supported the community vs. the applicant come the next election, especially since we find subtle ways of letting officials know we'll remind voters who supported their position come the next election.