

Data Centers and Tooele Valley

What a closed aquifer means for the question in front of the county — and what would have to be true for a project to belong here

A discussion paper for residents of Tooele County, Utah · September 2026

Tooele Valley is one of the fastest-growing places in Utah, sitting on top of an aquifer the State of Utah closed to new water in 1996. Those two facts, together, are the whole question. Everything else — jobs, taxes, noise, traffic — is real but secondary, because in this valley water is not a variable that can be negotiated upward. It is a fixed quantity that is already spoken for.

That sounds like the end of the conversation. It is not, and the reason is worth understanding before anyone decides. The technology used to cool these buildings has changed substantially in the last few years, and the newest designs consume very little water once they are filled. Whether that matters here depends entirely on which kind of facility is proposed — which is a question nobody has yet answered in public.

This paper does three things. It explains what these buildings actually do to the ground, air, and water around them, and how much the cooling design changes that. It sets out the concerns residents have raised — including the ones about private wells — and says plainly which are well-founded, which are misdirected, and which are the wrong worry about a real problem. And it describes what would have to be true for a project like this to belong in Tooele Valley.

It is written for a specific moment. On August 12, the Planning Commission tabled both a proposed data center ordinance and a plat application connected to the Utah Inland Port Authority's Tooele Valley Project Area, pending an independent study. A state discharge permit for the district's water treatment plant is awaiting decision. The Inland Port Authority's executive director has said publicly that the port will not advance any data center in Tooele County until local concerns are resolved. Nothing is settled. That is exactly when a community has the most leverage and the least information.

~85,000 Tooele County residents — the fastest-growing county in Utah	1996 Year the state closed the Tooele Valley aquifer to new appropriations	33 → 282 Acre-feet a year of brine, Phase I to full build-out, in the district's own filing	55,000 Gallons to fill a 1.5M sq ft sealed-loop Utah campus — <u>once</u> , not per day
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1. Why the cooling design is the whole question

A data center is a warehouse full of computers. The computers make heat. Nearly everything one does to its surroundings traces back to two facts: it needs a great deal of electricity, and it needs to get rid of heat. How it sheds that heat determines whether it is a major water user or a negligible one — and in Tooele Valley that is not a detail. It is the entire license to operate.

The industry's older approach was **evaporative cooling**: essentially a very large swamp cooler. Water evaporates, heat leaves with it, and the water is gone for good — continuously, every day, for the life of the building. That is the design behind most of the alarming water figures in national coverage, and it is the design that cannot work in a closed basin.

What has changed: sealed systems that are filled once

Newer facilities increasingly use **closed-loop liquid cooling**, in which coolant circulates through sealed pipes — often directly to the processor chips — and rejects its heat to the air through radiators rather than by evaporating. The distinction that matters for Tooele Valley is not how much water the system holds. It is that the water is *charged once and then recirculated*, rather than consumed continuously.

Two water profiles, same building size

The question is not how much water it takes to start. It is whether the water keeps leaving.

Evaporative — consumed continuously



...every month, for the life of the building

Roughly 590 acre-feet a year for a 100 MW facility. Never returns to the aquifer.

Sealed loop — charged once, then recirculated



one fill



...small top-ups only

A 1.5 million sq ft campus in West Jordan took about 55,000 gallons to fill its loop — a one-time charge. Its operator estimates evaporative cooling on the same campus would have consumed roughly 250 million gallons a year.

The gap between the two designs is not a matter of percentages. It is the difference between a permanent continuous withdrawal and a one-time fill. Novva's 1.5 million square foot campus in West Jordan charged its loop once with 55,000 gallons and then ran it on ambient air. An evaporatively cooled federal facility in Bluffdale consumed about 387 acre-feet in a year — and consumed it again the next year. *Sources: Salt Lake Tribune / Grist records requests, 2026; Kem C. Gardner Policy Institute, April 2026.*

What "low water" actually means in practice

Three different things get added together in public discussion, and it matters that only one of them is large. Novva's campus used about 3 million gallons — roughly 9 acre-feet — across a year. That figure gets quoted as the water cost of a sealed-loop data center. It is not. Here is what it is made of:

- **Cooling — a one-time charge, then effectively nothing.** 55,000 gallons filled the loop for 1.5 million square feet of building, and the heat is rejected to ambient air rather than by evaporating water. Ongoing cooling consumption does not appear in the annual figure at all. Microsoft began deploying a chip-level closed-loop design in 2026, starting in Phoenix, that it says uses zero water for cooling and saves more than 125 million liters a year per facility against the design it replaces.
- **Landscaping — about two-thirds of the annual total.** Entirely discretionary. In Tooele Valley, a condition of approval could simply require xeriscaping, and this line would largely disappear.
- **Domestic use — toilets, kitchens, washrooms.** A data center of this size employs a few dozen people, so its water footprint is that of a small office building.

Put together: a dry-cooled facility on a xeriscaped site would use water in Tooele Valley on the order of an office building with forty staff, not on the order of an industrial plant. That is a very different proposition from the one currently being argued about — and it is the proposition the county should be testing an applicant against.

The three options, and what each actually costs

Evaporative

~590 AF/yr

consumed, continuously

Lowest power use, lowest cost to build, quietest of the three.

Not available in a closed basin at any meaningful scale.

Closed-loop liquid

One fill

plus small periodic top-ups

Higher power use — pumps and fans do what evaporation did for free. Higher capital cost.

Workable here — and the direction the industry is already moving.

Dry / air-cooled

Near zero

domestic use only

Highest power use and capital cost. Loses efficiency on the hottest days. Loudest option.

Removes the water objection almost entirely.

There is no free option — only a choice of which scarce thing to spend. Water-saving designs spend electricity and money instead, and the driest ones are also the loudest, because they move far more air. A community that insists on low-water cooling to protect its aquifer should expect to negotiate harder on noise and on power. Those are better problems to have here than the water problem, but they are not nothing.

Why Tooele Valley is different from most places this argument is had

In most of the country, and in most of Utah, a large new water user negotiates for water. In Tooele Valley, there is nothing to negotiate for. The State Engineer's standing policy for Area 15 is unambiguous: **surface water is fully appropriated, and Tooele Valley groundwater is closed to appropriation** except for small amounts of shallow water that would otherwise reach the Great Salt Lake. The Tooele Valley Ground-Water Management Plan has

been in force since February 1996. In November 2022, the Governor's Proclamation 2022-01 closed the entire Great Salt Lake Basin to new appropriations on top of that.

This means a new industrial user in Tooele Valley has only four possible doors, and three of them are shut or narrow.

How a new industrial user can get water in Tooele Valley

1. Apply for new water from the aquifer Closed since 1996; Great Salt Lake Basin closed again by proclamation in 2022.	BLOCKED
2. Buy existing rights and move them (a "change application") Legal, and the usual route. But the 2008 Tooele Valley policy bars moving a point of diversion into the eastern zone, or more than 3 miles east of the original flow path. The most restrictive right in the bundle governs the decision.	RESTRICTED
3. Pump brackish groundwater and treat it Better than competing for fresh water — but still a withdrawal, and it produces a concentrated brine to dispose of.	PROPOSED
4. Build a facility that needs almost no water at all Sealed-loop or dry cooling. Costs more and uses more power. Does not draw down what neighbours drink.	THE TEST

This is the single most useful thing for residents to understand. Nobody can drill a new well into the Tooele Valley aquifer for an industrial project. That door has been closed for thirty years. Anything that happens here happens through door 2, 3, or 4 — which is why the questions that matter are about *transfers, treatment, and cooling design*, not about new permits. *Source: Utah Division of Water Rights, Area 15 policy, updated November 3, 2022.*

Noise, land, and traffic

- **Noise is the complaint that generates the most anger elsewhere**, and it is about permanence rather than volume. Cooling equipment runs 24 hours a day, typically 60–80 dBA at the property line, with a low-frequency component that carries. As noted above, the low-water designs are the loud ones. This trade should be made deliberately, in the ordinance, rather than discovered afterward.
- **Traffic will be the daily reality for most residents**, not the server building. The plats before the Planning Commission in August were for a truck stop and a fast-food outlet at the I-80 Burmester interchange, and the wider project area is planned around freight. Diesel traffic on I-80 and Burmester Road is what most people will actually experience.
- **The site adjoins Great Salt Lake wetlands.** This is a genuine constraint of a kind most Utah sites do not have, and it is the subject of the pending discharge permit discussed in Section 3.
- **Air.** A data center itself has no stack emissions; its backup generators run only for testing and outages, and permit limits on generator hours are standard and enforceable. If any on-site generating plant were ever proposed, that would be a materially different question requiring its own air permit and its own public process in a valley with winter inversions.

2. The concerns residents have raised — and which ones hold

At the County Council, at the Planning Commission in August, and at the state's July hearing on the discharge permit, residents have raised the same cluster of objections. They deserve to be answered specifically rather than reassured generally. Some are stronger than their advocates realize. At least one is aimed at the wrong mechanism.

The concern	What's behind it	How it holds up
"It will drain our wells"	The most common objection, and the one residents brought to the County Council. Households across Tooele Valley depend on private wells, and residents have said that groundwater is their way of life and their property value.	Right worry, wrong mechanism. No one can take new water from this aquifer — that has been closed since 1996. But a transferred agricultural right, pumped year-round from a new location instead of seasonally from an old one, <i>can</i> cause local drawdown and well interference. The fear is legitimate; the remedy is a drawdown study and the protest process, not a new-permit ban that already exists.

The concern	What's behind it	How it holds up
"There isn't enough water for this"	The valley has no substantial streams, surface water is fully appropriated, and the aquifer has been closed for three decades. Any industrial water must come from somewhere it is already committed.	The strongest argument, and it depends on the design. For an evaporatively cooled facility this is decisive — there is no lawful path to that much water. For a sealed-loop or dry-cooled facility the cooling demand largely disappears. The county cannot evaluate this without knowing which is proposed.
"The brine will make the lake saltier"	Draft permit UT0026409 would allow up to 0.26 MGD of reverse-osmosis reject to discharge through a normally dry channel, across a wetland, to transitional waters and Gilbert Bay.	Not supported by the file. The district's own analysis puts the reject at 3,281 mg/L total dissolved solids against Gilbert Bay at 120,000–150,000 — roughly 2% of the receiving water's salinity. As a matter of salt balance this discharge dilutes the lake rather than concentrating it. The wetland it crosses first is a separate and better question.
"There are no enforceable limits on arsenic and metals"	Raised by commenters at the July hearing and in written comment.	Correct, and confirmed by the draft permit. The Effluent Limitations table contains four parameters: flow, pH, oil and grease, and dissolved oxygen. The Fact Sheet states that metals "will be monitored and reported annually ... but will not have a limit associated with them," pending a reasonable potential analysis — even though the wasteload analysis already calculated limits (arsenic 150 µg/L chronic). This is the strongest documented criticism of the permit.
"The antidegradation review was never done"	A recurring claim in circulation locally.	Not accurate. A Level II Antidegradation Review was submitted by the district on March 13, 2026 and reviewed and approved by Division of Water Quality staff. It is attached to the Fact Sheet and can be read. Whether it reaches the right conclusion is arguable; that it exists is not.
"It will raise our power bills"	Nationally, the cost of generation and transmission built to serve one very large customer has often been spread across all ratepayers. 77% of Americans told Reuters/Ipsos they expect data centers to raise prices.	Real, and fixable by rate design. Twenty-four states have approved large-load tariffs requiring big customers to cover their own interconnection costs, and the Utah Public Service Commission is investigating one now. The county should not commit before that is settled.
"They don't create many jobs"	Substantially true. A 100 MW campus typically supports 20–40 permanent operations staff. Utah expects 2,000–3,250 permanent data center jobs statewide by 2030.	True, and it matters less here than elsewhere. Tooele County has 85,000 residents and Utah's fastest growth rate. It does not need a project to bring population. The honest case for a data center here is revenue per acre, not employment — and that case should be made in those terms rather than with job numbers that will not hold up.
"Why is it going in a lower-income area?"	Raised repeatedly at the August hearing. Heavy industry has a well-documented national pattern of siting near communities with less capacity to resist it.	A fair question that deserves a real answer. The honest response is that the site was chosen for I-80, rail and inexpensive land, not for the demographics of its neighbors. But the burden and the benefit do fall on different people, and saying so plainly is better than dismissing it.

One correction worth making in public

The reverse-osmosis plant at the center of the permit fight is described in the state's own notice as the **potable water system for the entire inland port district** — the drinking water plant for whatever is eventually built there, not a data center cooling system. It would likely be needed for any substantial development on that ground.

The district's own filing lists what it expects to serve: warehouse distribution centers, light manufacturing, **data centers**, a truck stop and travel center, and a hotel. So the connection to a data center is real and documented — but the water plant is sized for all of it.

This cuts both ways, and residents should hear both halves. The brine discharge is not by itself evidence of a thirsty data center. It also means *the water question does not disappear if the data center is dropped* — the district is proposing to pump and treat Tooele Valley groundwater regardless of what is built on the site. Arguing only about the data center may be arguing about the wrong thing.

3. What the permit file actually says

Who is "the district"?

"The district" in this paper means the Tooele Valley Public Infrastructure District, and it is worth being precise about what that is, because the term is doing a great deal of work in the public argument. TVPID was organized on May 9, 2024, under Utah's Public Infrastructure District Act. It was created by the Utah Inland Port Authority — the Act names the Port Authority as one of the "development authorities" empowered to create one. Under the Act, a public infrastructure district is a political subdivision of the state, "separate and distinct from, and independent of, any other public entity." **It is not Tooele County.** The county did not create it, does not govern it, and does not appoint its board.

What it can do is levy a property tax and issue bonds within its own boundaries. Those bonds are a general obligation of the district, repaid from taxes and assessments on property inside it rather than by county taxpayers generally, and they may run up to 40 years. The consent required to issue them comes from 100% of the surface property owners inside the boundaries — which, in a district drawn around land held by one developer, is a different thing from a public vote. Districts created by a development authority are also exempt from the independent municipal-advisor certification the Act otherwise requires. None of this makes a public infrastructure district improper; it is a widely used financing tool. It does mean that "public infrastructure district" and "public subsidy" are not synonyms, and that the ordinary safeguard of a countywide vote does not apply here.

Much of this debate has been conducted without reference to the documents. The draft permit, the Fact Sheet and the district's own antidegradation submission are public, and they answer several questions that have been argued about in the dark. Four things stand out.

The plant is brackish-water treatment, not fresh-water diversion. Production Well No. 1 yields water with 924 mg/L total dissolved solids and 425 mg/L chloride — above the secondary drinking water thresholds of 500 mg/L and 250 mg/L, respectively. This is water that has to be treated before anyone can drink it, which is why there is an RO plant at all.

The project is phased, and Phase I is small. The district's own filing states a Phase I discharge of about 29,000 gallons per day — roughly 33 acre-feet a year — rising to about 252,000 gallons per day, or 282 acre-feet, at full build-out. The permit caps the discharge at 0.26 MGD. Almost all public discussion has quoted the build-out figure as though it were the opening number.

The recovery rate is 75%. The Fact Sheet describes a raw water train reaching 600 gallons per minute with a reject stream up to 150 gpm. That fixes the withdrawal, which had previously only been inferred:

The district's water balance, from its own filing

At 75% recovery. Acre-feet per year in brackets.

	Groundwater withdrawn	Potable to the district	Brine to the channel
Phase I	116,000 gpd [~130 AF/yr]	87,000 gpd [~97 AF/yr]	29,000 gpd [33 AF/yr — stated]
Build-out	~1,008,000 gpd [~1,130 AF/yr]	756,000 gpd [~847 AF/yr]	252,000 gpd [282 AF/yr — stated]
	~2,500 homes culinary equivalent of the build-out withdrawal	~1.6% of annual aquifer throughput — but the basin is fully claimed	~2% brine salinity as a share of Gilbert Bay's own salinity

One discrepancy the county should raise. The Fact Sheet describes equipment reaching 600 gpm raw and 150 gpm reject (about 968 acre-feet of withdrawal a year). The district's antidegradation filing states a build-out discharge of 252,000 gallons per day, which at the same recovery implies 700 gpm raw and about 1,130 acre-feet. Those are not the same project. Sources: UPDES UT0026409 draft permit and Fact Sheet, Division of Water Quality, June 16, 2026, including the district's Level II Antidegradation Review.

The brine is far fresher than the water it flows into. The district puts the reject at 3,281 mg/L total dissolved solids; Gilbert Bay runs 120,000 to 150,000. On salt balance alone, this discharge dilutes the lake. Two caveats keep that from settling the matter: the channel it enters has a critical low flow of zero — it is normally dry, so the permit creates perennial flow where there was none — and the water crosses a wetland before it reaches anything hypersaline. A 3,281 mg/L discharge is fresh compared with Gilbert Bay and salty compared with a wetland.

Where the file is genuinely weak

The draft permit's Effluent Limitations table sets numeric limits on four things: flow, pH, oil and grease, and dissolved oxygen. Because the receiving channel offers no dilution, the Division of Water Quality determined that in-stream criteria apply as end-of-pipe limits, and its wasteload analysis calculated them — arsenic at 150 µg/L chronic, selenium at 4.6, and so on for a dozen metals. **Those calculated limits are not in the permit.** The Fact Sheet states that metals "will be monitored and reported annually ... but will not have a limit associated with them," pending a reasonable potential analysis.

On the numbers, arsenic is unlikely to be the problem: the source well tests at 6.3 µg/L, which even concentrated fourfold sits well under 150. But a permit that calculates limits and then declines to impose them is a fair thing to object to, and it is the most substantial documented criticism available. It is also readily fixable, and it is a state decision the county can formally comment on.

The file also shows that a less-polluting alternative was identified and rejected on cost. A total-containment evaporation basin would need roughly 113 acres and was costed at about \$2.6 million more than piping the brine to the lake. Whether that is a reasonable price to avoid a new discharge is a legitimate public question, and it is answerable because the number exists.

What this does and does not tell us

In a closed basin, water is a fixed pot: every acre-foot committed to industry is an acre-foot unavailable for housing, in a county adding thousands of residents a year. A build-out withdrawal of nearly 1,130 acre-feet is the culinary supply for roughly 2,500 homes that will now be built elsewhere, or not built. That is a real cost, and it should be stated plainly.

But this is the *district's* potable water system, serving warehouses, light manufacturing, a truck stop, a hotel and — in the district's own words — data centers. It is not a measure of data center cooling demand and should not be quoted as one. A sealed-loop or dry-cooled facility would add very little to it. An evaporatively cooled facility would add several times it, and there is no lawful path to that water in Tooele Valley.

Which leaves the decisive question narrow, answerable, and still unasked in public: **what cooling design is proposed, and what is its annual consumptive water use?** Everything else follows from the answer.

4. What would have to be true

Tooele County is not being asked to approve or reject a data center today. It is being asked to write an ordinance, approve plats, and decide what standard a future application must meet. That is a stronger position than most communities get, and it is worth using deliberately.

What the county controls, and what it does not

The state controls the water and the discharge. Appropriations, change applications and well interference are the State Engineer's. The discharge permit is the Division of Water Quality's. Executive Order 2026-03, signed in May 2026, now directs state agencies to weigh water availability, air quality, Great Salt Lake and ratepayer impacts before a data center proceeds.

The county controls whether there is anything to serve. Zoning, plats, conditional use, setbacks, noise limits and the ordinance now before the Planning Commission are entirely local. The state cannot compel Tooele County to permit the building. Every condition below is enforceable at the county level.

Before the ordinance is adopted:

- ❑ **Make the cooling design the threshold question.** Require closed-loop or dry cooling for any facility above a defined size and make evaporative cooling ineligible outright. This single provision resolves most of what residents are worried about, and it asks the industry for something it is already building elsewhere.
- ❑ **Require a full water balance as a condition of application completeness** — withdrawal, consumption, one-time charge volume, ongoing make-up, discharge, and the specific water rights and change applications relied on. No application should be heard without it.
- ❑ **Require an independent drawdown and well-interference study**, paid for by the applicant and reviewed by a hydrologist the county retains, addressing effects on existing private wells within a defined radius. This is the direct answer to the residents who spoke at Council.
- ❑ **Set a hard cap on consumptive water use per project**, written in acre-feet, with metering, annual public reporting and financial penalties for exceedance. Refuse any confidentiality clause over water data.
- ❑ **Address noise in the same breath as cooling**, because the low-water designs are the loud ones. Quarter-mile setbacks from homes, and limits written in octave bands and C-weighted decibels rather than A-weighted alone.

Before any specific project is approved:

- ❑ **Resolve the discharge permit first**, and comment on it formally. The county should not approve land uses that depend on a state permit still under review — and it should ask the Division of Water Quality to impose the metals limits its own wasteload analysis already calculated, rather than deferring them to a later reasonable potential analysis.
- ❑ **Ask whether the evaporation-basin alternative should be required.** The district's own analysis costed a total-containment basin at roughly \$2.6 million more than discharging. That is a specific, priced choice between a new perennial discharge and no discharge at all, and it deserves a public answer rather than a footnote.
- ❑ **Reconcile the two water balances in the file.** The Fact Sheet's equipment description and the district's antidegradation submission imply withdrawals about 160 acre-feet apart. Whichever is right should be the number of record before anything is approved.
- ❑ **Approve in phases.** The district's own filing describes Phase I at roughly a ninth of build-out. County approvals should be staged to match, with each phase conditioned on the water and monitoring data from the last.
- ❑ **Confirm the power arrangement in writing** — grid-served or on-site generation, and at what capacity. Each carries a different set of consequences, and neither the ratepayer question nor the air quality question can be assessed until the county knows which it is facing.

- ❑ **Insist on a plain-language accounting of the public financing:** what any tax increment diverts, who repays any public infrastructure district bonds, and what the county and the school district actually receive in each year of the agreement.
- ❑ **Require a decommissioning bond** sufficient to remove the structure, and phased milestones, so a stalled project does not leave the county holding partly built infrastructure.
- ❑ **Negotiate a construction-phase impact agreement** covering roads — Burmester Road in particular — and the strain on emergency services.

The bottom line

Tooele Valley's aquifer has been closed for thirty years and the county is growing faster than anywhere else in Utah. Those facts rule out one kind of data center completely: the evaporatively cooled kind that most national coverage describes. There is no lawful path to that much water here, and no ordinance should be written as though there might be.

They do not, by themselves, rule out the other kind. A sealed-loop or dry-cooled facility is charged once rather than drinking continuously, and the industry is already building them. Whether such a project belongs at the Burmester interchange is a fair question that turns on noise, traffic, wetlands, power and public financing — but it is a different question, and it deserves to be argued on its own terms rather than settled by figures drawn from a technology nobody would be permitted to build here.

What is missing is not analysis. It is one document. Residents worried about their wells are not being unreasonable and are not being manipulated: they are asking how much water, from where, and what happens to my well — and nobody has answered in public. The county's most useful next act is to make answering it a condition of being heard.

This paper was prepared for public discussion. Every figure is sourced below. Residents are encouraged to check them, disagree with the interpretation, and bring better numbers if they have them. Withdrawal figures are derived from the recovery rate and discharge volumes published in the permit Fact Sheet; where a figure is derived rather than stated, it says so. Nothing here is legal, engineering, or financial advice.

Sources

Utah Division of Water Rights, Area 15 — Tooele and Rush Valleys water rights policy, updated November 3, 2022. Source for surface water and groundwater closure, the 1996 Tooele Valley Ground-Water Management Plan, the 2008 change application policy, and Governor's Proclamation 2022-01.

Utah DEQ, Division of Water Quality, Draft UPDES Permit No. UT0026409 (Minor Industrial), Official Draft Public Notice Version, June 16, 2026 (DWQ-2026-002392). Source for the Effluent Limitations table — flow, pH, oil and grease, dissolved oxygen — and the five-year permit term.

Utah DEQ, Division of Water Quality, Fact Sheet, UPDES Permit No. UT0026409, Official Draft Public Notice Version, June 16, 2026, including the attached Wasteload Analysis and Antidegradation Level I Review (Christopher L. Shope, PhD, May 7, 2026) and the district's Level II Antidegradation Review submitted March 13, 2026. Source for the 600 gpm / 150 gpm design train, source water quality (924 mg/L TDS, 425 mg/L chloride, 6.3 µg/L arsenic), the calculated metals limits and the statement that they carry no permit limit, the Phase I and build-out discharge figures, reject salinity of 3,281 mg/L, the Gilbert Bay salinity comparison, the intended uses including data centers, and the discharge alternatives analysis.

Utah DEQ, Division of Water Quality, Public Notice of Public Hearing, UPDES Permit UT0026409, June 16, 2026 (DWQ-2026-003406). Source for the outfall coordinates, the receiving water classification and the hearing date.

Duck Thurgood, "Tooele County residents worry proposed changes could bring a data center to the area," Utah Public Radio, August 13, 2026. Source for the tabled ordinance and plat application, the I-80 Burmester interchange location, and concerns raised at the August hearing.

Caroleina Hassett, "Hundreds gather in-person and online in opposition to proposed Tooele data center," FOX 13 News Utah, July 28, 2026. Source for the Inland Port Authority executive director's statement and for residents' comments on wells, arsenic and salinity.

Leia Larsen, "Utahns speak out as yet another data center is planned near the Great Salt Lake," The Salt Lake Tribune, July 28, 2026.

Utah Code Title 17D, Chapter 4, Public Infrastructure District Act — particularly § 17D-4-102 (definitions of "creating entity" and "development authority," naming the Utah Inland Port Authority), § 17D-4-103 (a district is a political subdivision "separate and distinct from, and independent of, any other public entity"), and § 17D-4-301 (bond authority, 40-year maximum term, consent of 100% of surface property owners, and the exemption from municipal-advisor certification for districts created by a development authority). The May 9, 2024 organisation date is from the district's own filing in the UPDES Fact Sheet.

Utah Executive Order 2026-03, May 29, 2026, on the evaluation and development of data centers.

Kem C. Gardner Policy Institute (Univ. of Utah), data center analysis, April 2026, via Deseret News, April 15, 2026. Source for per-megawatt water figures and statewide employment projections.

Leia Larsen & Addy Baird, Grist / The Salt Lake Tribune, January 21, 2026. Source for Utah facility water-use comparisons, the 55,000-gallon one-time loop fill at Novva's West Jordan campus, its approximately 3 million gallons of annual site water, and the finding that roughly two-thirds of that went to landscaping.

Microsoft, closed-loop zero-water-evaporation datacenter design, announced December 2024; first facilities in Phoenix, Arizona and Mount Pleasant, Wisconsin from 2026. Company figure of more than 125 million litres saved per facility per year against the design it replaces.

Kem C. Gardner Policy Institute subcounty population estimates; U.S. Census Bureau county population estimates, 2025–2026.

Reuters/Ipsos, June 2026 poll on electricity costs; Columbia Law School Climate Law Blog on large-load tariffs, June 2026; Ramboll and Salas O'Brien, data center acoustics guidance, 2025–2026.

Water conversions: 1 acre-foot = 325,851 gallons. Aquifer throughput figures from the Utah Division of Water Rights Area 15 references. Withdrawal figures in Section 3 apply the 75% recovery rate stated in the Fact Sheet to the discharge volumes in the district's own filing.