

Health Impact Assessments: The Missing Safeguard in Michigan Data Center Permitting

No major data center operator conducts public HIAs. Michigan should require them.

Zero of the three most sustainability-advanced data center operators in the world have completed a publicly available Health Impact Assessment for any facility.

Calibration finding from Sadberry Singer analysis of Google, Microsoft, and Meta sustainability disclosures (2024 data)

The Regulatory Gap

Michigan is experiencing an unprecedented surge in data center proposals. The Oracle/OpenAI facility in Saline Township alone demands 1,383 MW of electricity (enough for one million homes) and was permitted by EGLE to destroy 9 acres of wetlands and install 15 diesel backup generators that will emit 34.86 tons of nitrogen oxides per year.¹ Bipartisan moratorium legislation (HB 5594–5596) and local moratoria in Howell Township, Sterling Heights, Pontiac, Oshtemo Township, and other communities reflect deep public concern about health and environmental consequences.²

Yet neither EGLE nor any local permitting authority in Michigan requires a Health Impact Assessment as a condition for data center approval. HIAs are systematic, evidence-based evaluations that identify potential health effects of a proposed project on nearby populations before construction begins. They are standard practice in transportation and housing projects but entirely absent from data center permitting nationwide.

What the Industry's Leaders Do and Don't Disclose

Health Indicator	Google	Microsoft	Meta
Health Impact Assessment	None	None	None
Community health monitoring	None	None	None
Worker safety TRIR	Not reported	Not reported	Not reported
Backup generator NOx/PM	Not reported	250 MT NOx, 9 MT PM	Not reported
Noise at facility boundary	Not reported	Not reported	Not reported

Source: Sadberry Singer calibration analysis of Google Environmental Report 2025, Microsoft Environmental Data Fact Sheet FY2024, Meta Sustainability Report 2024.^{3,4,5}

Why This Matters for Michigan

Data centers concentrate diesel combustion, noise, heat discharge, and water withdrawal in specific communities. These are often rural townships with limited regulatory capacity. In Saline Township, residents raised concerns about NOx emissions, wetland destruction, glycol contamination risk in the Saline River, and impacts to endangered species habitat including the Eastern Massasauga rattlesnake and Indiana bat.⁶ The University of Michigan Graham Institute's 2026 guidebook for local governments identifies air quality, water use, noise, and community disruption as key impact areas but notes that local governments currently lack standardized tools to evaluate cumulative health effects.⁷

An HIA would require developers to systematically assess baseline community health, model expected pollutant exposures (PM_{2.5}, NOx, noise, heat), evaluate vulnerable populations (children, elderly, existing respiratory conditions), and propose evidence-based mitigation, all before permits are issued.

Recommendations

- Require HIAs for data centers above 100 MW. Amend EGLE permitting rules or incorporate HIA requirements into the moratorium legislation (HB 5594–5596) as a condition for lifting the pause. The HIA should be publicly available and completed before air/water permit issuance.
- Mandate community health monitoring. Require pre-construction baseline health data and ongoing monitoring of PM_{2.5}, NOx, noise, and thermal discharge within a 5-mile radius, reported annually to EGLE.
- Tie tax exemptions to health accountability. Michigan's enterprise data center tax exemptions (PA 181/207 of 2024) should condition continued eligibility on HIA completion and community health monitoring compliance.
- Establish state HIA standards. Direct EGLE or the Michigan Department of Health and Human Services to develop data-center-specific HIA guidance, drawing on the National Research Council's HIA framework, adapted for diesel generation, cooling water, noise, and cumulative environmental justice burdens.

Sources

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