

Appendix G

Introduction

Pursuant to Minnesota Rules, part 4410.3610, subpart 5c, the Responsible Governmental Unit (RGU) shall revise the environmental analysis document based on comments received during the comment period. The RGU shall include in the document a section specifically responding to each timely, substantive comment received that indicates in what way the comment has been addressed.

The 30-day AUAR comment period began May 27, 2025, and comments were accepted through June 26, 2025. Three (3) comment letters were received from government agencies, and multiple comments were received from the public. Responses to those comments are included in the following sections.

1. Dakota County

Comment	Response
Environmental Resources	
General What is written in the draft AUAR report under the section 12.ii. Groundwater could be more clearly written for the future users of this report. As stated in the Dakota County comment letter on the AUAR, dated April 5, 2025, the water level in the onsite irrigation well (MN Unique Well Number 751667) was at 18 feet when the well was drilled in 2008. The depth to groundwater on the study area is shallow. The report is confusing by referencing water elevations, not depth to water (as required in the AUAR report directions), in three wells 2 to 3 miles from the study area. One well referenced; MN Unique Well Number 121846, was sealed 20 years ago in 2005. The report references the website where the well record for the onsite well, MN Unique Well Number 751667, is available. The AUAR report directions require the unique numbers and well logs to be provided, if available. None are included in this report even though the well record was provided with the comments dated April 5, 2025. As a reminder, there are at least two wells on the homestead adjacent to the project area, one in-use and one much older with an unknown status. Please refer to previous comments for information about existing wells. All the properties on report Figure 15 with habitation in Dakota County rely on private drinking water wells, no well records are provided in this report. Dakota County has a Delegated Well Program and authority over any unidentified wells found on the property, not the Minnesota Department of Health. A Dakota County well inspector can be reached at (952)891-7000. The Draft AUAR indicates a Phase I ESA was completed but provides limited information other than potential for agri-chemicals, a Phase II is proposed to be completed prior to development. The AUAR requires identifying measures to avoid, minimize or mitigate adverse effects from existing contamination and should include development of a Construction Contingency Plan or Response Action Plan as needed.	Comment noted. The well log provided by Dakota County has been referenced and attached to the AUAR. The AUAR has been updated. Coordination with the City, Dakota County, Minnesota Department of Natural Resources and Department of Health will be completed prior to development within the AUAR Study Area.

Comment	Response
Wastewater Rapid infiltration basins (RIBs) are proposed in the report as one method to dispose of the industrial process water. Stated in the report, "The area does have the potential for karst formation based on local mapping and will be instigated further prior to permitting the RIB system." The underlying dolostone is soluble. Geohazards can be created when water is redirected, or infiltration is concentrated like in the proposed RIB system leading to possible dissolution of the dolostone that could lead to catastrophic sinkhole formation. Paleokarst could already exist under the study area and collapse, or sinkhole formation could result from the weight of, or leaks from, the proposed RIBs and any stormwater basins.	Comment noted. A geotechnical survey and geophysical study will be completed prior to the design and construction of a wastewater treatment facility.
Stormwater The report states that, "The project area is designated as desirable location for infiltration by Dakota County". This area is not a desirable location for infiltration because of the potential for karst. As stated in the Dakota County comment letter on the AUAR, dated April 5, 2025, the Department of Natural Resources has mapped the project area near surface materials as highly vulnerable to pollution and the bedrock as highly sensitive to pollution. See enclosed map of Pollution Sensitivity of Near Surface Materials Map. The dimensions of proposed grading activities were not included in the report. Removal of the existing soil cover by grading can increase the risk of collapse of subsurface features by disrupting the support at the surface. Heavy precipitation events with decreased soil cover increases the risk of collapse and/or transport of contaminants if present, to the aquifer. A detailed site investigation of the study areas karst in order to characterize the impacts and to identify the risks involved utilizing subsurface geotechnical and geophysical techniques is strongly recommended. Consider using ASTM D8512-23 Standard Practice for Preliminary Karst Terrain Assessment for Site Development to guide the investigation. The report states that infiltration of the cooling water or stormwater will be outside of the DWSMA for Cannon Falls. This ignores the fact that infiltration will be occurring in the vicinity for private wells downgradient from where the infiltration will occur.	Comment noted. The AUAR has been updated. A geotechnical survey will be completed prior to the design of any stormwater management facilities to determine the most appropriate stormwater management approach. The proposed system design will be coordinated with the City and in accordance with MPCA State NPDES Permit Requirements and Minnesota Stormwater Manual.

Comment	Response
Water Appropriation The well on the property must be used for potable purposes. It was drilled incorrectly in 2008. A permit to reconstruct the well must be obtained from the Dakota County Delegated Well Program.	Comment noted. Further well investigation with the Minnesota Department of Health is ongoing to determine if the well was installed improperly.
Transportation Dakota County staff have no comment on the content of the draft AUAR. However, for ease of review of the final Traffic Impact Analysis of the AUAR, staff suggests the following formatting corrections. • Include the exhibits in the actual report and not as a separate appendix. • Include site plan proposed scenarios in the Traffic Impact Analysis. • Please place the discussion of scenarios in proper order. Scenario 2 trip generation discussion, conditions and intersection analysis occurs before Scenario 1 within the document. • For the exhibits, please include the Rochester Boulevard label and associated County highway number on all maps. • Show the county boundary on all maps. • Exhibit 3 – Orient volume figures to be consistent to the actual direction in this and all maps. • Exhibit 10 – Explain why more trips are predicted to use the secondary access point in place of the primary access location.	
	Comment noted.

2. Minnesota Department of Transportation (MnDOT)

Comment	Response
Water Resources	
A MnDOT drainage permit may be required before development occurs. The permit applicant shall demonstrate that the off-site runoff entering MnDOT drainage system(s) and/or right of way will not increase. The drainage permit application, including the information below, should be submitted online to: https://olpa.dot.state.mn.us/OLPA/. Please upload this letter with the drainage permit application. The following information must be submitted with the drainage permit application: 1. Grading plans, drainage plans, and hydraulic calculations demonstrating that proposed flows to MnDOT right of way remain the same as existing conditions or are reduced. 2. Existing and proposed drainage area maps with flow arrows and labeling that corresponds with the submitted calculations. 3. Hydro CAD model and PDF of output for the 2, 10, and 100-year Atlas 14 storm events. Once a drainage permit application is submitted, a thorough review will be completed, and additional information may be requested. Please contact Jason Swenson, Water Resources Engineering, at jason.swenson@state.mn.us or 651-234-7539 with any questions.	Comment noted. The project proposer and city will coordinate with MnDOT as needed for a drainage permit.
Permits	
Any work that affects MnDOT right of way will require an appropriate permit. All permits are available and must be applied at: https://olpa.dot.state.mn.us/OLPA/. Upload this letter when applying for permits. For questions regarding permit submittal requirements, please contact Buck Craig of MnDOT's Metro District Permits Section at buck.craig@state.mn.us or 651-775-0405.	Comment noted.

Comment	Response
<i>Review Submittal Options</i>	
MnDOT's goal is to complete reviews within 30 calendar days. Review materials received electronically can be processed more rapidly. Do not submit files via a cloud service or SharePoint link. In order of preference, review materials may be submitted as: 1. Email documents and plans to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 MB (megabytes) per email. Documents can be zipped as well. If multiple emails are necessary, number each email. 2. Files over 20 MB can also be uploaded to MnDOT's Web Transfer Client site: https://mft.dot.state.mn.us. Contact metrodevreviews.dot@state.mn.us, and staff will create a shared folder in which files can be uploaded to. Please send an accompanying email with a narrative for the development.	Comment noted.

3. Minnesota Pollution Control Agency (MPCA)

Comment	Response
Noise	
The EQB's AUAR Guidance states: [...] If the area will include or adjoin major noise sources, a noise analysis is needed to determine if any noise levels in excess of standards would occur, and if so, to identify appropriate mitigation measures. [...].	Comment noted. The AUAR study area is surrounded by state highways, county roads, industrial and residential areas. The current noise in the AUAR study area consists of traffic noise including truck and vehicular traffic, noise from industrial, residential, and agricultural uses, and occasional train noise. As noted, the noise standards within the AUAR Study Area as based on the Noise Area Classification (NAC) for the receptors in the area. Any development within the AUAR study area will be required to comply with MN state noise standards as noted in MN Rules 7030.0040. Once a project design is identified for the AUAR study area, a noise analysis will be completed to understand the ambient noise and project noise for the proposed project. Mitigation measures as discussed in the AUAR will be implemented to minimize noise impacts for the adjacent properties.

Comment	Response
Section 19 does not indicate the anticipated sound level from noise sources during the "Operational" phase of the project and does not provide any analysis of the state noise standards in Minn. R. 7030.0040.	Comment noted. The AUAR study area is surrounded by state highways, county roads, industrial and residential areas. The current noise in the AUAR study area consists of traffic noise including truck and vehicular traffic, noise from industrial, residential, and agricultural uses, and occasional train noise. As noted, the noise standards within the AUAR Study Area as based on the Noise Area Classification (NAC) for the receptors in the area. Any development within the AUAR study area will be required to comply with MN state noise standards as noted in MN Rules 7030.0040. Once a project design is identified for the AUAR study area, a noise analysis will be complete to understand the ambient noise and project noise for the proposed project. Mitigation measures as discussed in the AUAR will be implemented to minimize noise impacts for the adjacent properties.

Comment	Response
Section 19 does not provide enough information to determine whether the project will conform with state noise standards. The state noise standards are evaluated based on the Noise Area Classification (NAC) of the receiver of the sound, which is based on land use activity. If there are residential dwellings nearby, the proposer and should evaluate whether the project will have impacts at those residential locations that would exceed the NAC 1 standards in Minn. R. 7030.0040.	Comment noted. The AUAR study area is surrounded by state highways, county roads, industrial and residential areas. The current noise in the AUAR study area consists of traffic noise including truck and vehicular traffic, noise from industrial, residential, and agricultural uses, and occasional train noise. As noted, the noise standards within the AUAR Study Area as based on the Noise Area Classification (NAC) for the receptors in the area. Any development within the AUAR study area will be required to comply with MN state noise standards as noted in MN Rules 7030.0040. Once a project design is identified for the AUAR study area, a noise analysis will be completed to understand the ambient noise and project noise for the proposed project. Mitigation measures as discussed in the AUAR will be implemented to minimize noise impacts for the adjacent properties.

Comment	Response
The RGU and any other land-use decision makers, should consider language in Minn. R. 7030.0030 that reads “[...] Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification noise section of the EA (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use.” The W does not provide enough detail regarding current and anticipated sound levels in the project area to determine whether an immediate violation of the state noise standards would occur if the project were approved.	Comment noted. The AUAR study area is surrounded by state highways, county roads, industrial and residential areas. The current noise in the AUAR study area consists of traffic noise including truck and vehicular traffic, noise from industrial, residential, and agricultural uses, and occasional train noise. As noted, the noise standards within the AUAR Study Area as based on the Noise Area Classification (NAC) for the receptors in the area. Any development within the AUAR study area will be required to comply with MN state noise standards as noted in MN Rules 7030.0040. Once a project design is identified for the AUAR study area, a noise analysis will be completed to understand the ambient noise and project noise for the proposed project. Mitigation measures as discussed in the AUAR will be implemented to minimize noise impacts on adjacent properties.
MPCA strongly recommends the proposer conduct a noise study and potentially evaluate methods to mitigate noise impacts to any nearby residential locations.	Comment noted. A proposed development within the AUAR study area will complete a noise study to determine ambient and projected noise within the AUAR study area.
Wastewater	
12.b.i.1) Wastewater indicates that a sanitary sewer extension will be required for the project. A map showing the route to the existing sewer system connection showing the impacted area of construction should be included.	Comment noted. Exhibit added.

Comment	Response
Stormwater Infiltration	
A number of discharge options are identified for industrial wastewater generated from a water-cooled system under the proposed Scenario 2 including infiltration via rapid infiltration basins or irrigation. In addition to the high volume of cooling water discharged, there will be infiltration of onsite stormwater. A portion of the project site is also located within the city Drinking Water Supply Management Area (DWSMA). The impacts to the DWSMA, groundwater and surface waters from infiltrating large volumes of water and the temperature of the cooling water should be discussed in more detail. Impacts to area ground water elevations may impact surrounding properties and the potential areas for groundwater discharge to surface waters should be included. High temperature discharges may impact both underlying geology and surface water discharges and this should be discussed in more detail.	Comment noted. Further study and analysis will be completed to understand potential water discharge and infiltration options for cooling water and stormwater management once a specific project is proposed. The project proposer will work with the city and other regulatory agencies as needed.
More detail should be provided regarding capability of the soil and geology to infiltrate the large volume of water and include seasonal variations in flow and weather. Rapid infiltration typically requires storage of wastewater over winter to account for reduced infiltration capacity due to frozen ground conditions. The temperature of the cooling water infiltration may prevent freezing on the site, but down gradient ground may freeze and cause groundwater to mound and impact surrounding areas.	Comment noted. Discharge of non-contact cooling water will be minimal during the months of October through April. Most of the cooling of the systems will be during the months of May through September. Based on the preliminary geotechnical studies that have been completed for the site, soils are favorable for infiltration. Additionally, the preliminary geotechnical analysis has not currently identified any karst features within the AUAR study area. Further evaluation and design will be completed prior to development to understand potential constraints within the AUAR study area. Temperature control measures will be implemented to minimize impacts to the Cannon River.

4. City of Cannon Falls/Hampton Township – Community Members Comments/Questions

Comment	Response
Kari Lundin As a resident of Hampton Township, with a farm perched perfectly between two proposed data centers, I would like to register my grave concerns about the possible annexation of Simon's land currently in Randolph Township. Having done my best as a lay person to understand what I can of the AAUR, I would like to address the proposed water consumption by the Cannon Falls Data Center. On page 5, the report states the center would use 49 million gallons of water per year. The proposed data center in Hampton would draw another 12.5 million gallons. Combined, that's 61,500,000 gallons per year. The average American uses 82 gallons of water per day, and between 29,200 to 36,500 gallons of water per year. That means the two data centers water consumption would be the equivalent of adding 2106 people to the community. That sounds suspicious. Tract, the developer of the proposed data center in Farmington claims that center could use 12.5 million gallons of water per year. To a lay person, that suggests either one of the parties isn't being completely honest, or the center in Cannon Falls is going to be a giant monstrosity that will ultimately suck us all dry. The Cannon River is our most precious resource as a community. Not only does it add charm and bring a sense of peace to our community, it also draws over 100,000 visitors a year to paddle its waters or bike along its banks. The proposed data center will be just 1700 feet from its shore. That's just 1/3 of a mile. Pine Creek is 1.3 miles north; and fed in part by the spring that comes up from the ground on my neighbor's farm. Both of these bodies of water are essential to the survival of the abundant wildlife that lives near both. So too are my farmer neighbors who irrigate thirsty crops with water from the aquifer below.	Comment noted. The City has completed a water and wastewater analysis for the proposed development scenarios and have determined there is appropriate capacity for the development scenarios and future growth of Cannon Falls. However, the project proposer is evaluating the potential to utilize the existing water appropriations permit and well for non-contact cooling water. If additional water appropriations and a change to the existing well is needed, the city and project proposer will coordinate studies and applications with the Mn DNR, MDH, Dakota County and other agencies as needed.

Comment	Response
None of those who depend on that water can afford to sacrifice a single drop. I moved to Cannon Falls from Los Angeles 20 years ago for the quiet, serenity and equestrian community. Losing those qualities in exchange for a comparative handful of jobs for employees who will live elsewhere due to a lack of housing and better schools seems the wrong path forward. Surely we can find something better to grow our community and benefit ourselves rather than the tech oligarchs behind AI and its insatiable appetite for our natural resources.	
Megan Bauer Lack of Public Notice and Opportunity for Engagement The public has not had adequate opportunity to review and comment on the AUAR. While the draft was published in the Environmental Quality Board Monitor on May 27, only the scoping documents were available on the City of Cannon Falls website. There were no clear calls for public comment in the local newspaper or at recent city council or planning commission meetings. Without effective outreach, the community has been left unaware and unable to participate. I strongly urge that the AUAR comment period be extended and widely publicized to ensure transparency and informed community input.	Comment noted, The Draft AUAR was posted to the City's website prior to the publication in the Mn EQB Monitor. The Draft AUAR was also sent to the EQB Distribution list prior to publication in the EQB Monitor and was available through the EQB Monitor. A public meeting is not a required step in the AUAR process; however, the project proposer and consultants participated in City Council work sessions and a City Council meeting to discuss the AUAR process.
Megan Bauer Inadequate Level of Environmental Review Although the AUAR outlines two development scenarios (pg. 9), the Cannon Falls Technology Park website makes it clear that the goal is a data center or technology park. Given the significant and specific environmental risks posed by such a facility, an Environmental Impact Statement (EIS)—not just an AUAR—is warranted. An EIS would provide a more comprehensive and transparent evaluation of long-term and cumulative environmental consequences.	Comment noted. The AUAR process is an EIS level review for land uses and scenarios. Multiple scenarios were studied in the AUAR, and mitigation strategies have been outlined for impacts identified through the AUAR. As specific projects are identified within the AUAR study area and it is determined any components of the project exceed another threshold under Mn Rules 4410.4300, an Environmental Assessment Worksheet or other

Comment	Response
	appropriate level of review would be completed.
Megan Bauer Insufficient Analysis of Water Use and Cumulative Aquifer Impacts The AUAR does not sufficiently analyze the broader and cumulative water impacts of this development, especially when considered alongside other regional data centers. According to Star Tribune reporting, Tract is developing 500 MW data centers not just in Cannon Falls, but also in Farmington and Rosemount. These facilities are all located within the same general hydrological system and may draw from the Prairie du Chien–Jordan aquifer, which already supports municipalities, agriculture, and private well users. The AUAR estimates that the Cannon Falls facility alone may use up to 4.66 million gallons per day (pg. 52)—the daily water use of approximately 46,600 people, based on EPA data. When multiplied across Tract's multiple sites, this usage could easily exceed 10–15 million gallons per day. Such demand poses a serious threat to aquifer sustainability, especially during drought conditions. Historically, water-intensive developments have caused extensive regional harm. In Elko New Market, the proposed Niagara Bottling facility prompted a DNR-ordered 41-day pump test. The result: one residential well went dry, and others up to 20 miles away experienced geochemical changes, including dangerous manganese contamination—a neurotoxin that killed pets and destroyed water treatment systems. The city must now build a costly new water treatment plant and provide alternative water sources to residents. According to a study of EPA Region 5 (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin, and 37 Tribal nations), large-scale groundwater withdrawals—such as those from data centers—have lowered the water table by 400 to 600 feet in some areas. The AUAR must evaluate how cumulative withdrawals from multiple data centers in the region could cause permanent aquifer drawdown, affect surface water bodies, increase well	Comment noted. The City has completed a water and wastewater analysis for the proposed development scenarios and has determined there is appropriate capacity for the development scenarios and future growth of Cannon Falls. The City of Cannon Falls currently has a water appropriations permit for 250 Million Gallons per Year (MGY) and is currently pumping approximately 149 MGY. Additionally, the project proposer is evaluating the potential for utilizing the existing water appropriations permit and well for non-contact cooling water. If additional water appropriations and a change to the existing well is needed, the city and project proposer will coordinate with the Mn DNR, MDH, Dakota County and other agencies as needed. Minnesota State Statue 103G.271 does not allow “once-through cooling systems” and that the cooling water will need to go through multiple cycles of concentration.

Comment	Response
failures, and trigger costly public infrastructure crises. Additionally, the AUAR should require an evaluation of alternatives such as closed-loop geothermal cooling systems, which can significantly reduce water use compared to “pump-and-dump” systems.	
Megan Bauer Excessive Energy Use and Grid Strain The AUAR does not adequately address the energy consumption impacts of the proposed 500 MW data center (pg. 70). This facility could consume the equivalent of 250,000 to 500,000 households’ electricity every hour. Overburdening the grid risks blackouts, wildfires from sagging power lines, and increased pollution from diesel generators. These are not hypothetical risks—these are growing concerns wherever data centers are concentrated.	Comment noted. The AUAR does not study energy and power. Great River Energy is completing studies to understand capacity within the existing grid system, what improvements and permits would be triggered by a potential project. Great River Energy required to provide power to all customers in their territory as regulated by the Minnesota Public Utilities Commission.
Megan Bauer Inadequate Carbon Mitigation Measures The projected increase of 20,189 metric tons of CO₂ annually (pg. 64)—equivalent to emissions from 2,700+ homes—demands stronger mitigation. The current plan lacks the specificity and ambition necessary to address the serious climate consequences of this development. More aggressive carbon offset strategies, renewable energy sourcing, and on-site energy efficiency measures should be required.	Comment noted. The GHG emissions were calculated using EQB guidance and the recommended EPA calculation tool. The proposed project will implement energy efficient design and will be encouraged to use renewable energy for powering the buildings.
Megan Bauer Lack of Noise Impact Analysis and Mitigation Despite the close proximity to private residences, the AUAR fails to estimate the potential noise impacts from cooling systems or propose specific mitigation measures (pg. 66, 75). In Northern Virginia, Amazon Web Services data centers caused residents 600 feet away to suffer sleepless nights and chronic headaches. In Texas, cooling fan noise has been	Comment noted. The AUAR study area is surrounded by state highways, county roads, industrial and residential areas. The current noise in the AUAR study area consists of traffic noise including truck and vehicular traffic, noise from industrial, residential, and agricultural uses, and occasional train noise. As noted, the noise standards within the AUAR

Comment	Response
linked to migraines, nausea, and even emergency room visits—despite the facilities being across town. Fairfax County now requires at least 200 feet of separation from homes, mandatory noise studies, and sound barriers. Similar safeguards should be adopted here. In closing, I urge you to extend the public comment period, make additional efforts to inform and engage the public, and consider requiring a full Environmental Impact Statement. The scale and intensity of the proposed development present long-term risks to our environment, infrastructure, and quality of life that deserve a thorough and transparent review process.	Study Area as based on the Noise Area Classification (NAC) for the receptors in the area. Any development within the AUAR study area will be required to comply with MN state noise standards as noted in MN Rules 7030.0040. Once a project design is identified for the AUAR study area, a noise analysis will be completed to understand the ambient noise and project noise for the proposed project. Mitigation measures as discussed in the AUAR will be implemented to minimize noise impacts on adjacent properties.
Ann Buselmeier I would like to make a public comment for the record about the AUAR for the proposed Mega Data Center in Cannon Falls. Page 60, documents, "No significant visual impacts are anticipated." Has anyone doing this study ever driven by a data center at night? It looks like a huge dome of light reaching far up into the sky. And since Data centers operate 24/7, 365, this has the possibility and probability of greatly disturbing the migratory birds. Since Cannon Falls has a river system and lake, there are many different species of birds that migrate through our area. Minnesota as a state is part of the Mississippi flyway and supports high volumes of migratory birds and I have to believe based on our local waterways, high volumes of birds migrate through the Cannon Falls area. Migratory birds use the night sky for navigation and artificial lighting disorients the birds, causing the birds to circle the artificial lights and become weak and more susceptible to predators. Maybe this issue has already been addressed in the AUAR. But if not, I do feel it needs to, because this issue is significant, and visual impacts for migratory birds CAN BE anticipated.	Comment noted. The project proposer will be required to comply with city lighting requirements and any identified requirements in the Planned Unit Development (PUD) standards.
RJ Davisson Development Scenarios - Page 8 indicates a potential development scenario of "1,750,000 sq ft" of <u>light industrial use</u>. Again, on page 51 the developer's input states, "Scenario 1 is	Comment noted. The figure reference has been updated.

Comment	Response
proposed <u>light industrial</u>..." Earlier on page 51 the AUAR response states that the rezoning will be "...then rezoned to "I2 - General Industrial" ..." City of Cannon Falls zoning district I-1 Limited Industrial is the zoning district for "light industrial", not the I-2 zone. The I-2 General Industrial zone is written and intended for "heavier" industrial uses that <u>are</u> conditionally permitted (example: concrete product plants, building materials, crude oil, gas and liquid storage tanks, manufacturing of materials such as rubber, corrosive acids, petroleum and chemical products. which propose potential health and safety risks, etc.) These are "heavy" industrial uses. No such similar "heavy" industrial use is permitted or conditionally permitted in the I-1 zoning district. The City of Cannon Falls "Land Use Plan" map from the City's 2003 Comprehensive Plan (Map 23a - page 8.6; also Figure 11 in the AUAR, cited incorrectly as Figure 7 in the AUAR text) used to justify the proposed annexation land use merely shows the area as "industrial" and does not specify the land referenced in the AUAR study to be any specific industrial type. The I-1 and I-2 zones districts were not codified in City ordinance until 2006 and the Land Use Plan map, or any other map, was not updated to reference that it should be either general or light industrial zoning. The City can plan for either the I-2 or I-1 industrial. I-1 is more appropriate and conducive for the City to use for future control of the area — unless the City wants to be faced with the potential of a concrete plant, crude oil and gas storage, corrosive chemical or petroleum products, etc. Nowhere in the multiple possible scenarios of the Scenarios or an existing document is there indication that the developer will not develop the land to certain uses if the City grants the I-2 zone usage.	
<i>RJ Davisson</i> The AUAR states on page 10 "Land Use" that the "The study area is generally bound by...residential properties to the north..." and elsewhere, "Land uses adjacent to the study area include...single family residential, see Figure 7." The I-1 zoning district is approved and written "to provide for less intensive uses, which	Comment noted.

Comment	Response
because of their proximity to residential areas.....are less likely to impose objectionable influences such as noise, vibrations, dust, heat, smoke, odor and the like." It is specifically suited to the AUAR plan development scenarios. The I-1 zoning district allows many of but not all the uses listed in the I-2 zoning, but because the zone is written to specifically acknowledge the proximity to residential areas, and because the proposed land use may actually come to be industrial in nature (Scenario 1 Light Industrial) , and not a technology park (Scenario 2) , I-1 is a more appropriate zoning district with the stated guideline to consider "proximity to the [residential single family properties] that about the AUAR land that was studied. A technology park would also more appropriately be developed in an I-1 zoning district.	
RJ Davisson Table 2: Climate Considerations and Adaptations, page 16 — The table indicates: Resource Category - Climate Considerations and Adaptations "The proposed development scenarios are not anticipated to generate hazardous waste or materials." Adaptations - "Not applicable." age 55 (d). Project Related Generation/Storage of Hazardous Wastes The AUAR asks that hazard wastes during the operation of the project be described. The answer given was "Not applicable." Scenario 1 is for Industrial Development. In an industrial development not defined at this time the potential exists for hazardous waste byproduct in the industrial uses that might be permitted in the relevant zoning district. An answer other than 'not applicable' is required. An answer must be made because the possible scenarios for Scenario 1, at least, could include the hazardous materials or emissions from the types of uses conditionally allow in an I-2 zone, which the developer indicates it would prefer. To repeat, the I-2 zoning district may allow such uses as concrete product plants, building materials, crude oil, gas and liquid storage tanks, "manufacturing of materials such as rubber, corrosive acids, petroleum and chemical products. which propose potential health and safety risks," and others that are allowed in	Comment noted. Any development in the AUAR study area will be required to follow all local, state, and federal rules for contamination, hazardous waste storage and disposal.

Comment	Response
the developer's current proposal of an I-2 General Industrial zone usage. RJ Davisson Page 27 (c). The document says: "Scenarios 1 and 2 would require rezoning as the parcels will be annexed into the City with an agricultural use. The sites would be rezoned to "I-2 General Industrial District" ... Annexation of land by the City of Cannon Falls is not annexed with an agricultural use. The land would be annexed as an Urban Reserve (UR) zoning district. Per City Ordinance § 152.448 ANNEXATIONS. "All territory hereafter annexed to the city which is not shown on the zoning map shall automatically, upon annexation, be classified within the UR District and shall be subject to all regulations, notations, references and conditions as are applicable to the District until a time that a determination may be made as to the proper district classification for the territory and an amendment can be made to that effect."	Comment noted. This has been corrected.
RJ Davisson Wells - Figure 15, page 46 * What impact will the project, both Scenario 1 and Scenario 2, have (Figure 15. Groundwater Resources, page 46 and following text on pages, especially pages 51, 52) on the multiple private wells that are in very close proximity to northern boundary of the AUAR study area? There are many residential private wells shown on the Figure map, some seemingly within yards of the proposed project land. These wells are the only source of water for the residents' use. There appears to be seven (7) wells to the north. Although these wells are not within the boundary of the AUAR study the impact of both Scenarios should be addressed as to the effect on the owners. * Are the residential wells producing water from the same aquifer as the current agricultural well on the study property (40.3 million gallons per year)? * Both Scenario 1 and Scenario 2 discuss the potential reconstruction of the existing	Comment noted. The City has completed a water and wastewater analysis for the proposed development scenarios and has determined there is appropriate capacity for the development scenarios and future growth of Cannon Falls. The City of Cannon Falls currently has a water appropriations permit for 250 Million Gallons per Year (MGY) and is currently pumping approximately 149 MGY. Additionally, the project proposer is evaluating the potential for utilizing the existing water appropriations permit and well for non-contact cooling water. If additional water appropriations and a change to the existing

Comment	Response
onsite agricultural well or using the well as is for the potential projects. There are at least four, and probably more, scenarios to the Scenarios - many combinations. What would be the effect on the abutting residential wells if the well is reconstructed and used for water supply for either of the project Scenarios - indicate lowest and highest water usages and the effect of each. * If the maximum volume of water is used for each Scenario - there are many numbers tossed around on pages 51 and 52 and elsewhere - what will be the effect on the residential wells? * If well water is used for any of possible uses of the AUAR studied land, in whatever volume is required, what assurances and guarantees will be made and legally binding for the developer to make to remediate any negative effects to the homeowners?	well is needed, the city and project proposer will coordinate with the Mn DNR, MDH, Dakota County and other agencies as needed. The Mn DNR is the regulatory agency that reviews and issues all water appropriation permits in the state of Minnesota and if a water appropriations permit amendment would be needed for any of the development scenarios, further coordination with the NDR is needed and the DNR may require further studies for the surrounding area.
RJ Davisson Figure 15. Groundwater Resources <i>Old Castle-Hancock</i> The map in Figure 15 is incomplete, perhaps because the Minnesota Well Index map that was used for the study is incomplete. There are no wells shown on Old Castle-Hancock property on the west side of County Road 29. There is a well in use on the Old Castle (ex-Hancock) property. Old Castle-Hancock is not connected to city water. Further research is needed and impact results considered and updated in the AUAR. Old Castle has at least one well on the property, registered and tagged, which was installed in the mid-1970s. Old Castle directly abuts the proposed project and the AUAR report area on the north side and the west side of the AUAR reported area. Further, Old Castle land directly abuts the wetlands that are indicated in the AUAR report. This is within the Cannon Falls wellhead protection area and Drinking Water Supply Management Area (DWSMA), as stated in the AUAR report. * What aquifer is used?	The wells shown in Figure 15 are based on publicly available data and identify residential wells within the AUAR study area vicinity. The City has completed a water and wastewater analysis for the proposed development scenarios and has determined there is appropriate capacity for the development scenarios and future growth of Cannon Falls. The project proposer is evaluating the potential for utilizing the existing water appropriations permit and well for non-contact cooling water. If additional water appropriations and a change to the existing well is needed, the city and project proposer will coordinate studies and applications with the Mn DNR, MDH, Dakota County and other agencies as needed.

Comment	Response
* What impact does the proposed project and potential well water volumes have on Old Castle's well water usage? * What is the project's impact on the Old Castle well and the impact of the well's location relative to the project's proposed over/through wetland entrance off County 29? <i>Other Properties - their water comes from somewhere</i> Since the map index used for the AUAR study is not accurate, further investigation is required using other available sources and reported, the AUAR should be updated and impacts of water usage on those wells included in the AUAR report. In addition to the Old Castle-Hancock well, there may be unreported wells on properties that directly abut the study area: * What acquifer(s) are in play? * Residential homes to the east of the residential seven (7) wells on the properties directly north of the AUAR study land. No wells are shown, but the water is sourced from somewhere. These are all in Dakota County. Parcel IDs 310010025051, 310010025050, 310010005015, 3100010005014 (Dakota County) * The area known as Haas Livestock - surrounded on three sides by the AUAR report and directly across County 29 from Cannon Falls Trailer sales as County 29 curves west. This property is partially in Cannon Falls and partially in Dakota County. It is oddly carved out of the proposed annexation. Parcel ID: 525100100 (Goodhue County) and Parcel IDs 310010090012 and 310010090011 (Dakota County). <i>Fire Protection</i> If, as written, the existing well on the property is reconstructed and use solely for the industrial or technology park development — this is a potential that was floated in the AUAR — what impact would it have on the Cannon Falls Fire Department's and the Hampton Randolph Fire Department's capabilities for fire protection under Minnesota State Fire Code?	As noted in the AUAR, the city provides water to residents from the Jordan and Jordan-St. Lawrence aquifers. The water mains will be extended to the site and fire protection provided via the City's water distribution system.

Comment	Response
* Would there be adequate, continuous pressure and volume in the required amounts for an extended time frame? * Would the fire departments be allowed to use the development's well water for a potential fire at the abutting residential homes and businesses? * What impact would there be on surrounding identified and yet-to-be identified wells	
RJ Davisson Page 48 — "Infiltration would provide some recharge of water to the aquifer, while irrigation for the crops can provide another use of the water verses (sic) using ground water to directly irrigate the crops." * How would crop irrigation be this achieved and on what specific land-property would crop irrigation occur?	Comment noted. Infiltration and other ways to reuse or discharge non-contact cooling water or stormwater will be evaluated once a specific project is identified in the AUAR study area.
RJ Davisson Page 49 - "The industrial process water quality under Scenario 2 would contain little to no BOD or TSS and would have slightly higher concentrations of minerals found naturally occurring in the ground water. Industrial process non-contact cooling water would be discharged either to the City's system (pending study results and necessary system improvements), in rapid infiltration basins (RIBs) or through other methods of spray irrigation or attenuation, or a combination thereof." * What effect would higher concentrations of minerals have on crops in a crop irrigation scenario?	Comment noted. Infiltration and other water ways to reuse, treat and/or discharge non-contact cooling water or stormwater will be evaluated once a specific project is identified in the AUAR study area
RJ Davisson Page 56 and Page 57— AUAR states, "Tree clearing will take place between November 1st and March 31st to avoid potential impacts to roosting bat species and breeding migratory birds." (page 56), and "Should tree clearing be needed for development of Scenario 1 or Scenario 2, tree clearing activities will be conducted	Comment noted. The mitigation strategies identified in the AUAR study area will be implemented by any projects proposed in the AUAR study area.

Comment	Response
between November 1st and March 31st to avoid potential impacts." (page 57) Similar statements were made on page 59. Page 2 of 3 (MNR letter dated July 30, 2024 states: "If feasible, avoid initial disturbance to grassland areas and tree/shrub removal from May 15th through August 15th to avoid disturbance of nesting birds." Further the MNR letter states: Tree and shrub removal is required to be avoided during the breeding season, april through July. With tree/brush and grassland disturbance and removal restrictions the soonest the project could begin in any year would be November 1st for tree removal. As required all grassland disturbance would have to be finished by May 15th of the following year. If all grassland work was not completed by May 15th the remaining undisturbed grassland would need to be left undisturbed until August 15th. "If feasible" is feasible and is a known even at this premature date and development plans can be scheduled around these dates. * Will these development restrictions be included in the development agreement between the City and the developer?	
RJ Davisson Page 66 - 20. Transportation. Parking — The report stated as fact: "For the Technology Building Use, in lieu of a standard parking requirement, a Parking Analysis Memo as agreed to by the staff will determine an appropriate amount of parking required for the Campus" Has the City of Cannon Falls already agreed to this statement in the AUAR or is it a point still open for discussion and negotiation?	Comment noted. Parking requirements and ratios will be discussed as part of future rezoning/PUD discussions and hearings with the city. The parking requirements will be approved by the City Council and will be documented in the PUD.
Julie Maidment I am a tax paying resident of Cannon Falls. My husband and I moved here in 2005. I am and have lived here and been employed here for 20 years.	Comment noted.

Comment	Response
I have just been made aware of a proposed Data Center to be built in Cannon Falls and I have many concerns regarding costs and quality of life. I demand an extension on any decisions regarding said proposal as well as demanding a full environmental impact statement. The demands on our community of this Data Center are enormous. Extreme water use, massive energy use, high carbon emissions, and noise emissions. And there is no information on how this Data Center will impact our taxes. Numbers I have been made aware of (today!) on the above are: The Data Center proposed would use the water of a population of 46,000! Energy/power usage of the equivalent of 250,000-500,000 homes! Carbon emissions of 20,189 metric tons per year with extremely week mitigation plans! Zero noise impact statements. As City Administrator your concerns are first and foremost for the quality of life to those who reside in our fine city. The quality of life here is, at present, excellent. Why has not this Data Center proposal been shouted from the rooftops? John Wiik The AUAR draft does not appear to differentiate between the light industrial scenario (scenario 1) and the technology park scenario (scenario 2). As noted in Section 10b on page 27, there is little or no difference between the permitted uses in the two proposed scenarios. The lack of detail makes it difficult to understand and determine the differences between the impacts of the two proposed scenarios, particularly in terms of traffic, noise, air quality, and water usage. Additionally, Section 10b does not address the impacts of either scenario on the existing adjacent land uses, specifically the residential area to the north.	
	Comment noted. The proposed AUAR studies multiple scenarios and uses. Impacts and mitigation strategies have been identified for both scenarios to mitigate impacts within the AUAR study area and to the adjacent properties.

Comment	Response
Ron Maidment I have recently been made aware of a proposed Data Center to be built here in Cannon Falls. I do have many concerns regarding costs and how this will impact the quality of life here in Cannon Falls. I demand an extension on any decisions regarding said proposal and I demand a full environmental impact statement. The demands of this Data Center are enormous on a community of this size. Extreme water usage, massive energy usage, high carbon emissions, and the impact of increased noise emissions. And no information on how this Data Center will impact our taxes. Numbers I have been made aware of on the above are, that the Data Center would use the water of a population of 46,000! Energy/power usage is the equivalent of 250,00-500,000 homes! Carbon emissions of 20,189 metric tons per year with extremely weak mitigation plans. Zero noise impact statements.	Comment noted. Impacts for multiple development scenarios have been identified, and mitigation strategies have been discussed in the AUAR. As specific projects are identified, further studies and analysis will be completed to comply with state, county and local required permits and regulations.
Jacob Kostorzewski First, I don't understand why we have not received an environmental impact statement rather than the AUAR given the data center is clearly the intent behind the report. Secondly, I don't feel that the residents of Cannon Falls were given appropriate notice or information, so we really need an extension to give the community more time to discover and discuss the implications of this project. On that note, the data center brings a lot of concerns to me, primarily in environmental impact in the form of carbon emissions, and potential waste in water used for cooling, not to mention the incredibly high amount of water projected to be used. We already have limited water on the planet, and this would be using an insane amount for a data center with dubious uses. The energy use is also extremely high, and I worry about the strain on the grid, without even mentioning the actual power consumption. On top of all this, this technology park will certainly be producing an excess of noise, and to top it all off, it isn't even clear who is benefiting from the tax revenue. Please reconsider	Comment noted.

Comment	Response
the approval of this technology park. Ginger Bauer I have some serious concerns about this project and the process you are following to gain its approval. First, neither of those meetings I attended provided much meaningful information to the public. Tract's Information Session was simply a set of large posters that was more marketing language than specific, concrete information and the proposal was not discussed at the recorded City Council meeting but instead was buried in the consent agenda. The only discussion I saw was at the joint May 20 meeting, and my key takeaways from that joint meeting on May 20, 2025 were: 1. The May 20 work session was to inform city council members of the proposed data center timeline. The City Administrator, Mr. Radermacher, told City Council members that they will need to review a lot of information and make decisions quickly to meet the aggressive timeline. 2. The anticipated data center deal will not provide a tax benefit to Cannon Falls. City staff seem to be relying on the data center developer (Tract) and future end user (to be determined) to prioritize the best interests of the community. 3. According to the city administrator, the benefits to Cannon Falls will be Tract developing the land and the future end user (to be determined) hopefully providing jobs and charitable donations to foster community goodwill. Nothing has been guaranteed. 4. The city engineer stated that he assumes that Tract would not have approached Cannon Falls without confirming their water and power usage needs are feasible. 5. Per the city attorney, city staff will provide the city council with legally and factually supported information so they can make a rational decision. 6. City staff do not review data center issues outside their control, like electricity	Comment noted.

Comment	Response
usage or noise levels. There was no mention of possible impacts on the environment, electrical grid, or groundwater from this development at the meeting. The developer was attracted to Cannon Falls for our water and sewer infrastructure. 7. It will be up to citizens to proactively voice concerns and influence city council members regarding the data center. Although Councilmember Chris Nobach asked many questions and asked city staff to be transparent with the public, no city council or planning commission member volunteered at that time when the city administrator asked someone to attend internal meetings with Tract and make sure any issues are reported and addressed. 8. Mayor Matt Montgomery reminded everyone that no decisions would be made at the work session; it was designed to only be an introduction of the timeline and what information to expect to receive from city staff. The city administrator, city attorney and city engineer all stressed that they are working behind the scenes to gather the data and would be providing the city council with a lot of information which would be used to form their decision.	
Ginger Bauer I would like to highlight the statement that councilperson Chris Nobach made that evening. Mr. Nobach stressed that transparency to the public is key and asked that city staff make sure the information is available to the public and that the public is notified in a variety of ways. I have no idea if more information has been provided to the city council and where they are in the process nor have I seen notices provided to the public, but I've heard through the grapevine that you have a 335-page document, the AUAR (Alternative Urban Areawide Review) available for public review and have set a deadline of midnight, June 26, 2025 for the public to review the AUAR and comment. The city of Cannon Falls has NOT notified the public in the variety of ways that councilperson Nobach requested nor has the city council presented any kind of reason why Cannon Falls should even consider this proposal from Tract, other than the narrow marketing campaign Tract put together.	Comment noted. The Draft AUAR was posted to the City's website prior to the publication in the Mn EQB Monitor. The Draft AUAR was also sent to the EQB Distribution list prior to publication in the EQB Monitor and was available through the EQB Monitor.

Comment	Response
I understand that the timeline outlined for the city council on May 20, 2025 is aggressive and that city staff is urging the city council to be mindful of possible missed deadlines if decisions are not made quickly, but it seems to me that the deadlines on the timeline are designed to benefit Tract and, frankly, to rush the process so the serious issues that perhaps are not under the control of the city of Cannon Falls, are not carefully considered. Tract has merely hinted at possible benefits for the city but can't commit to any real benefits and city staff admitted at the May 20 joint meeting that they don't review factors that are out of their control. I contend that even if factors are not under the control of city staff or the city council, they are morally obligated to consider the factors that will affect not only residents of Cannon Falls, but also the surrounding region. In addition, the Cannon Falls City Council DOES have control over factors that city staff doesn't because they are the governing body that will ultimately make the decision. If this proposal was just about building a facility in the industrial park that might provide jobs, that's one thing, but the end-goal of the proposed technology park is to build data centers and those facilities pose significant and specific environmental risks that need more in-depth study. An AUAR is not sufficient to review those risks. An Environmental Impact Statement (EIS) is the type of study that would provide a more comprehensive evaluation of environmental consequences. Additionally, as noted by the Cannon Falls city engineer at the May 20 joint meeting, city staff does not review data center issues outside their control so they are only focusing on the capacity of our city water and sewer system. According to city staff, once capacity is determined it would be up to the developer to figure out how to deal with any additional capacity needed. The issue though is that we ALL draw from the same water source, the Prairie du Chien–Jordan aquifer, and we all benefit or are negatively affected by decisions affecting our environment. They may not be under the direct "control" of the city of Cannon Falls, but any negative impact on it DOES affect us all. These other factors outside the direct control of the city of Cannon Falls but that are affected by data centers and may consequently affect our residents include CO₂ emissions, strain on our energy grid, and noise levels. Again, the Cannon Falls City Council DOES have control because they have the power to vote yes or no. Not only do they have a moral obligation to ensure the Cannon Falls environment is protected, it is	

Comment	Response
also the moral obligation of the citizens who elected them to ensure we're provided with ample opportunity to be aware and informed of how decisions will affect our community. Which leads me to my point. I do not feel that the city of Cannon Falls has provided residents with adequate notification that the AUAR is available to review nor enough time and opportunity to ask questions about the timeline, the benefits and the possible harmful effects of the proposed project. Too many questions remain unanswered that, though not technically the job of city staff to pursue, present long-term risks to our community and quality of life. In closing, I am requesting that you extend the public comment period and make additional efforts to inform and engage the public. I also urge you to consider requiring a full Environmental Impact Statement.	
Lisa Anderson I understand and share the strong desire in Cannon Falls to attract more economic development, but the City must do so in a way that is smart and sustainable. 251 acres is a lot of real estate and will use a lot of power and water. The Kimberly Horn document is high on hopes and short on details. What kind of jobs will it create and, realistically, where will they hire from? Are we really willing to go all in on this? And how, exactly, does the City or the people that live here benefit? What proportion of the taxes they pay goes to local government? As someone who's done ROI analysis, I would love to see their data analysis that arrives at \$13:\$1; my guess is there are a lot of assumptions in that that tend toward optimistic. I am very concerned about the environmental impacts of a development like this, regardless of any remediation promises they make. I've been in the same rooms where taconite mines promise they won't contaminate water and later then spend years arguing their responsibility for doing so in court when a contamination happens. How would a data center behave differently? We have enough problems with water pollution--let alone energy use, air pollution, noise pollution, etc. We're learning a lot about the problems with data centers and the strict requirements Met Council has used. Should the city decide to allow this data center, I strongly encourage a	Comment noted.

Comment	Response
timeline that allows for authentic public engagement, thorough environmental review, rigorous economic analysis, and rigid remediation requirements. In sum, there are a lot of vague and concerning claims being made with little to back it up, and the fact that this is being fast-tracked only elevates those concerns.	
Alan Muller The City website has only one obvious link to the data center and that goes directly to the promoters' site. While other information can be found online, one gets the impression that the City is NOT making a good-faith effort to inform and involve residents. This impression is reinforced by the apparent lack of meaningful public notice and the inadequate time allowed for comments on the draft review document. Strong provisions for public involvement are basic elements of the MN Environmental Policy Act. The Minnesota Environmental Review program was established by the Legislature in 1973 (This wording is from the MN Department of Health) Minnesota Environmental Policy Act(MEPA) The Minnesota Environmental Policy Act of 1973 (MEPA) established the Environmental Quality Board (EQB), which oversees the formal environmental review process for the state of Minnesota. In Minnesota, environmental review consists most frequently of the completion of one or both of the following documents: Environmental Assessment Worksheet (EAW): A screening tool to determine whether a full environmental impact statement is needed. The worksheet is a six-page questionnaire about the project's environmental setting, the potential for environmental harm and plans to reduce the harm. Approximately 150 worksheets are completed each	Comment noted, The Draft AUAR was posted to the City's website prior to the publication in the Mn EQB Monitor. The Draft AUAR was also sent to the EQB Distribution list prior to publication in the EQB Monitor and was available through the EQB Monitor. A public meeting is not a required step in the AUAR process. The Scoping document and Draft Order was published in the EQB Monitor on March 4, 2025, and ran through April 3, 2025. The Final AUAR Order was approved by the City Council on April 15, 2025. The AUAR was published in the EQB Monitor on May 27, 2025, and comments were collected by the City through June 26, 2025. The Final AUAR and Mitigation Plan will be published for the 10-day agency objection period on July 22, 2025. It is anticipated that the Final AUAR and Mitigation Plan will be adopted by the City Council on August 5, 2025.

Comment	Response
year. Environmental Impact Statement (EIS): An in-depth analysis used for major development projects that will significantly change the environment. The EIS covers social and economic influences, as well as environmental impacts, and looks at alternate ways to proceed with the project. Note that there is no mention here of "Alternative Urban Area Review" This is something more recently grafted onto Minnesota's Environmental Review program, and, in my opinion, is not appropriate in this matter. Start working for area residents and stop working for the applicant (TRACT). Abandon the pretence that multiple projects are under real consideration. Restart the environmental review process with meaningful public engagement in scoping an EIS. Develop an EIS with extensive public engagement and consideration of what has been learned from data center projects elsewhere. Give priority to developing an ordinance with adequate provisions for controlling data center projects, being cognizant of experiences elsewhere.	
Emily Peterson My concerns about this AUAR are about what happens if, when or after the AUAR is approved. Given that Data Centers have set their sites on MN, and even though this AUAR lists two potential outcomes, a future data center appears to be the clear goal. With this in mind, my main concern is that the City of Cannon Falls protect its future development options by requiring (future) tenants of the Technology Park to conduct an	Comment noted. Impacts for multiple development scenarios have been identified, and mitigation strategies have been discussed in the AUAR. As specific projects are identified, further studies and analysis will be completed. The City has completed a water and wastewater analysis for the proposed development scenarios and has determined

Comment	Response
EIS (which are industry-specific) to address the following issues (citations are from the AUAR): Extreme water use: Up to 4.66 million gallons/day (p. 52) — more than 46,000 people worth of water. No real mitigation (pp. 71–72). Massive energy use: 500 MW according to the Star Tribune — power for 250,000–500,000 homes, unaddressed in the AUAR. High carbon emissions: 20,189 metric tons/year (p. 64) — equals 2,700+ homes, with weak mitigation plans. Noise impacts: No noise estimates provided (p. 66), despite homes nearby. Electronic Waste Disposal: not addressed in this AUAR The above AUAR citations are based primarily on TRACT's estimates for unspecified projects. But it is a fact, though not a widely publicized one, that some Data Centers, depending on their focus, require more resources than others. For example, Data Centers that focus on storing photos, emails, etc. have different water/cooling/electrical waste disposal/electrical needs than those that deal in AI and Crypto storage, which require even more of the above, especially water and electricity, and create more electronic waste as well. Basically, I'm worried that the City of Cannon Falls will look only at the purported short-term gains of this project and ignore the potential long-term consequences, not only for the environment, but for the Cannon Falls Community in general. Ultimately, either decision (short or long term) requires an assessment of resource allocation, recognizing that such allocations will impact future generations of Cannon Falls residents, perhaps positively, perhaps negatively. All impacts need to be weighed and considered with short and long term visions in mind.	there is appropriate capacity for the development scenarios and future growth of Cannon Falls. The City of Cannon Falls currently has a water appropriations permit for 250 Million Gallons per Year (MGY) and is currently pumping approximately 149 MGY.

5. Legalelectric – Attorney Comments

Comment	Response
There's NOTHING on the Cannon Falls AUAR page about availability of the Draft AUAR; there's no ID of the linked 5-20-2025 AUAR as the DRAFT available for comment; and there's nothing stating that the process includes commenting on the draft, when comments are due, and where to send them. This provides a good argument for inadequate notice. That info should be prominently stated. Under Minnesota Rule 4410.3610, there's 30 days from date of publication in the EQB Monitor, which was May 27, which means comments are due June 26, just over a week away. Again, notice provided by the RGU is inadequate. (There's also nothing stated about submission of comments on the EQB Monitor page: https://webapp.pca.state.mn.us/eqb-search/project-detail/262244?sild=262244-PROJ00000000001)	Comment noted, The Draft AUAR was posted to the City's website prior to the publication in the Mn EQB Monitor. The Draft AUAR was also sent to the EQB Distribution list prior to publication in the EQB Monitor and was available through the EQB Monitor. A public meeting is not a required step in the AUAR process.
It looks as though you're farming contacts to the consultants, or is it to TRACT? The whois is hidden. The City is the RGU for the AUAR and you are named as the City contact: 3. RGU RGU: City of Cannon Falls Contact Person: Jon Radermacher Title: City Administrator Address: 918 River Road City, State, ZIP: Cannon Falls, MN 55009 Phone: 507-263-9304 Email: cityadmin@cannonfallsmn.gov	As noted in Mn Rules 410.3610, the local government unit is the RGU for an environmental review as noted in 4410.4400. The City administrator is the RGU.
There is no such thing as the "Minnesota Pollution Control Agency's Environmental Quality Board." It's the Environmental Quality Board, which is a separate agency. The website does filter through MPCA, but it is a separate entity. EQB rules for AUAR govern: https://www.revisor.mn.gov/rules/4410.3610/	Comment noted.

Comment	Response
<u>USE OF AUAR IS DISENGENUOUS AND DECEPTIVE</u> For the record, I am sending this Comment and attachments to the Environmental Quality Board because use of an AUAR in this manner, rather than preparation of an Environmental Impact Statement, is improper, contrary to the intent and black letter of the AUAR rule. At this time, I ask that an Environmental Impact Statement be prepared based on the project's need for permits triggering a mandatory EIS, i.e., use of numerous diesel generators and thus a need of an Air Permit from the MPCA, water appropriation and other permits from the DNR, and a Certificate of Need permit from the Public Utilities Commission. The project must also demonstrate through dB(A) and dB(C) noise modeling the ability to comply with the industrial noise standard at nearest receptor.	Comment noted. The AUAR process is an EIS level review for land uses and scenarios. Multiple scenarios were studied in the AUAR, and mitigation strategies have been outlined for impacts identified through the AUAR. As specific projects are identified within the AUAR study area and it is determined any components of the project exceed another threshold under Mn Rules 4410.4300, an Environmental Assessment Worksheet or other appropriate level of review would be completed.
<u>INADEQUATE NOTICE OF DRAFT AUAR – EXTEND COMMENT DEADLINE</u> Cannon Falls did not provide the notice that's required for an AUAR. I did not learn of it until this late date. There's no explanation of a comment period, how to comment, who to send it to, and nothing about the deadline. How are we to know? At this time, I ask that a Notice of Availability of AUAR for Comment be issued, with a comment period of 30 days from publication of Notice. The Notice, including deadline for Comments and a link to the Draft AUAR, should be published by the EQB Monitor; the Cannon Falls Beacon Notices section; prominently displayed on the City of Cannon Falls and Randolph Township home pages; and displayed on the Cannon Falls AUAR page together with a link to the Draft AUAR.	Comment noted, The Draft AUAR was posted to the City's website prior to the publication in the Mn EQB Monitor. The Draft AUAR was also sent to the EQB Distribution list prior to publication in the EQB Monitor and was available through the EQB Monitor. A public meeting is not a required step in the AUAR process.

Comment	Response
<u>THE AUAR CONTENT IS DEFICIENT IN MANY RESPECTS</u> The AUAR is inadequate as it does not provide basic information necessary to determine potential impacts. SCENARIO 2 IS A DATA CENTER The description of "Scenario 2" is misleading and should be corrected. "Scenario 2 represents proposed technology park development. Construction is anticipated to begin in 2026, see Figure 4." The AUAR Figure 4 shows only a blue blank area. <u>ENERGY USE AND DIESEL GENERATORS MUST BE QUANTIFIED</u> The AUAR is inadequate because the range of megawatts needed to operate such a project and the source of this energy has not been disclosed. There is a natural gas plant across the road from the site, intermediate natural gas generation which would generate CO2. The AUAR is inadequate because the number and output of diesel generators that would be required for this Tract data center in testing and in an external power outage and the air emissions have not been disclosed. The range of megawatts of energy needed to power the data center and the energy source(s) must be disclosed. The number of diesel generators, their output, and the air emission profile must be disclosed. Energy use and air emissions may be mitigated by amending the zoning ordinance to require the data center produce a significant percentage of its energy with solar and batteries and battery back-up power. Looking at the site plan, the many buildings and green space provide opportunities for solar generation and battery storage. The project could also be required to buy into local/community solar projects.	Comment noted. The AUAR studied two land use scenarios, a technology park and a light industrial park. An AUAR is a land use scenario based environmental review, and a building footprint or layout is not required. The study is to demonstrate the maximum density of development and identifies potential impacts and mitigation strategies for the proposed land use scenarios.
	Energy is not addressed in an AUAR or EAW. It is up to the utility provider to determine if there is capacity in the grid system for any proposed project in their service territory. It is not known at this time if diesel or other types of generators or other methods for emergency power will be needed for the proposed project. If a proposed project exceeds any thresholds or triggers any additional environmental review, it will be completed prior to construction. All permits will be obtained prior to construction.

Comment	Response
<u>WATER SOURCE, CONSUMPTION, AND DISCHARGE SPECIFICS MUST BE DISCLOSED, CUMULATIVE IMPACTS BE DETERMINED</u> Independent verification is needed of information about projected peak and average day water usage; projected wastewater discharge in the form of AWW, MWW, and PHWW; and projected wastewater discharge strength for BOD, TSS, P, Chlorides, Sulfates, Metals, TKN, and potentially others. The many data center projects that intend to draw from the same aquifer must be tallied, and resources be equitably and responsibly distributed in a sustainable manner. A pump test should be performed to determine sustainability of proposed water draw.	Comment noted. The City has completed a water and wastewater analysis for the proposed development scenarios and has determined there is appropriate capacity for the development scenarios and future growth of Cannon Falls. The City of Cannon Falls currently has a water appropriations permit for 250 Million Gallons per Year (MGY) and is currently pumping approximately 149 MGY. Additionally, the project proposer is evaluating the potential for utilizing the existing water appropriations permit and well for non-contact cooling water. If additional water appropriations and a change to the existing well is needed, the city and project proposer will coordinate with the Mn DNR, MDH, Dakota County and other agencies as needed. The Mn DNR is the regulatory agency that reviews and issues all water appropriation permits in the state of Minnesota and if a water appropriations permit amendment would be needed for any of the development scenarios, further coordination with the NDR is needed and the DNR may require further studies for the surrounding area.

Comment	Response
<u>PROJECT SETBACKS ARE NOT EVEN MENTIONED IN THE AUAR!</u> The AUAR must address setbacks, and setbacks that would be effective in mitigating expected impacts, particular to those residences/receptors along and up against the northern boundary of the area.	Comment noted. Setbacks are addressed during the Planned Unit Development (PUD) process with the City.
<u>VISUAL IMPACTS OF A COMPLEX OF 80 FOOT TALL BUILDINGS IS NOT ADDRESSED</u> The AUAR must describe in specificity and provide drawing the visual buffers that would mitigate visual impacts of the project.	Comment noted. The AUAR studies land use scenarios and not specific development proposals. Visual impacts will be addressed during the PUD process with the City. As previously discussed, construction of berms, installation of vegetation, and appropriate building materials will be used to minimize visual impacts.
<u>AIR EMISSIONS AND NEED FOR AIR EMISSIONS PERMIT MUST BE DISCLOSED – AUAR MUST ALSO CREDIBLY ADDRESS GREENHOUSE GAS EMISSIONS</u> The AUAR must disclose the type, sources, quantities, and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants and criteria pollutants. Discuss effects to air quality including any sensitive receptors, human health, or applicable regulatory criteria. Include a discussion of any methods used to assess the project's effect on air quality and the results of that assessment. Identify pollution control equipment and other measures to be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions, including air permit. The AUAR is incomplete in its discussion of unavoidable greenhouse gas emissions inherent in Scenario 2, with details about the diesel generators, expected emissions, and the rationale behind the calculations.	As noted in the EQB guidance for an AUAR, stationary air emissions is not addressed in an AUAR. GHG emissions have been addressed using EQB guidance and the EPA calculator tool. If a proposed project within the AUAR study area is at a threshold that requires an air permit for stationary air emissions, coordination with MPCA, including a potential environmental review, will be completed prior to construction.
<u>SOCIOECONOMIC IMPACTS ARE NOT ADDRESSED IN THE AUAR</u> The AUAR must address the range of likely socioeconomic impacts.	Socioeconomic impacts are not required in an AUAR.

Comment	Response
<u>THE AUAR DOES NOT ADEQUATELY ADDRESS NOISE</u> The AUAR must disclose with specificity the equipment generating noise, and must provide noise modeling showing dB(A) and dB(C) noise levels at distances necessary to reduce noise to 60, 55, 50, and 45 dB(A) and dB(C). Noise is a likely issue with significant impact that must be more thoroughly addressed in the AUAR.	Any development within the AUAR study area will be required to comply with MN state noise standards as noted in MN Rules 7030.0040. Once a project design is identified for the AUAR study area, a noise analysis will be completed to understand the ambient noise and project noise for the proposed project.
<u>ORDINANCE AMENDMENT CAN PROVIDE SOME MITIGATION</u> The project schedule anticipates zoning changes. The City should appoint an Advisory Committee to gather and provide information to the Planning Commission.	Comment noted.

Comment	Response
<u>REVISE SCHEDULE TO FACILITATE CORRECTED AND SUPPLEMENTED ENVIRONMENTAL REVIEW</u> Reschedule all steps to provide updating and correction of AUAR or commencement of mandatory Environmental Impact Statement. At this time, I ask that a Notice of Availability of AUAR for Comment be issued, with a comment period of 30 days from publication of Notice. The Notice, including deadline for Comments and a link to the Draft AUAR, should be published by the EQB Monitor; the Cannon Falls Beacon Notices section; prominently displayed on the City of Cannon Falls and Randolph Township home pages; and displayed on the Cannon Falls AUAR page together with a link to the Draft AUAR. At this time, I also ask that an Environmental Impact Statement be prepared based on the project's need for permits triggering a mandatory EIS, i.e., use of numerous diesel generators and thus a need of an Air Permit from the MPCA, water appropriation and other permits from the DNR, and a Certificate of Need permit from the Public Utilities Commission. The project must also demonstrate through dB(A) and dB(C) noise modeling the ability to comply with the industrial noise standard at nearest receptor. At this time, I request that drafting of Ordinance Amendments begin and that an advisory group be formed to assist the City in addressing the legitimate concerns surrounding this data center. Again, as RGU, the City must reschedule all steps to provide updating and correction of AUAR or commencement of mandatory Environmental Impact Statement.	Comment noted, The Draft AUAR was posted to the City's website prior to the publication in the Mn EQB Monitor. The Draft AUAR was also sent to the EQB Distribution list prior to publication in the EQB Monitor and was available through the EQB Monitor. The AUAR process is an EIS level review for land uses and scenarios. Multiple scenarios were studied in the AUAR, and mitigation strategies have been outlined for impacts identified through the AUAR. As specific projects are identified within the AUAR study area and it is determined any components of the project exceed another threshold under Mn Rules 4410.4300, an Environmental Assessment Worksheet or other appropriate level of review will be completed. It is not known at this time if diesel or other types of generators or other methods for emergency power will be needed for the proposed project. If a proposed project exceeds any thresholds or triggers any additional environmental review, it will be completed prior to construction. All permits will be obtained prior to construction.

Comment	Response
I forgot to add a simple but obvious error. It's Oxides of Nitrogen (NOx) and NOT Nitrous Oxide (N2O). See AUAR p. 62, and Appendix at 307 of 335.	Comment noted. It is true that Oxides of Nitrogen (NOx) encompasses all the Nitrogen greenhouse gases, however Nitrous Oxide (N2O) is deemed to be the more detrimental for air pollution and is the main Nitrogen gas of concern. The Greenhouse Gas Assessment tool provided through the EPA also notes Nitrous Oxide (N2O) in their calculations.