

Appendix H



June 23, 2025

City of Cannon Falls
Jon Radermacher
918 River Road
Cannon Falls, MN 55009

Thank you for the opportunity to review the Draft Alternative Urban Area-wide Review (AUAR) for the proposed Cannon Falls Industrial Park to develop the study area from existing farmland to industrial or technology park uses. Dakota County Physical Development staff reviewed the document and offer the following comments for consideration.

Environmental Resources

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.

Physical Development Division

P 952-891-7000 **F** 952-891-7031 **W** www.dakotacounty.us
A Dakota County Western Service Center • 14955 Galaxie Ave. • Apple Valley • MN 55124

12.b.i. 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.

12.b.ii. 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.

12.b.iii. 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.

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.

Physical Development Division

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- 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.

If you have any questions relating to these comments, please contact me at 952-891-7007 or Georg.Fischer@co.dakota.mn.us

Sincerely,

A handwritten signature in blue ink, appearing to read "Georg T. Fischer".

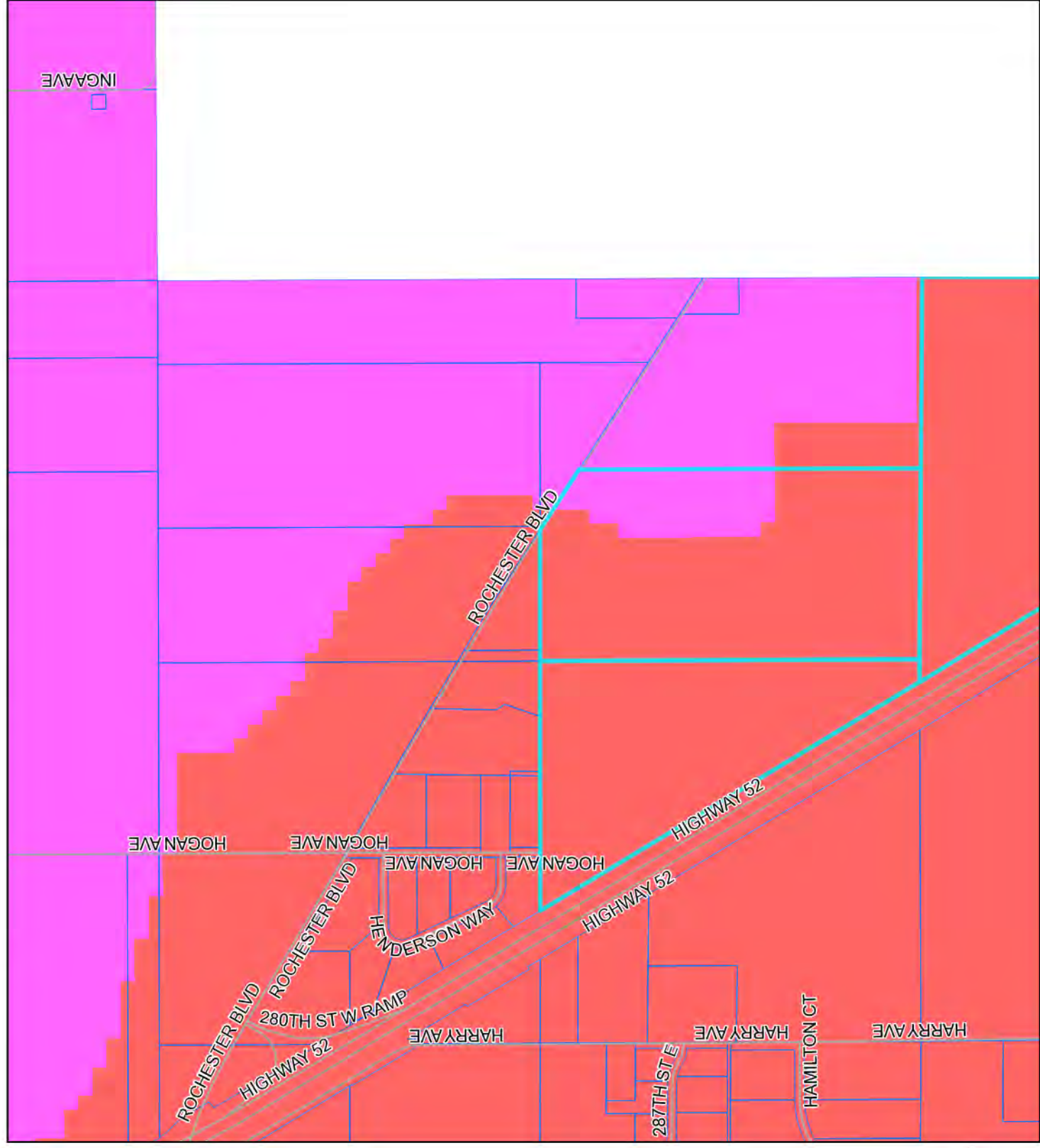
Georg T Fischer, Director
Physical Development Division

cc: Commissioner Mike Slavik, District 1
Heidi Welsch, County Manager

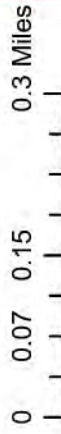
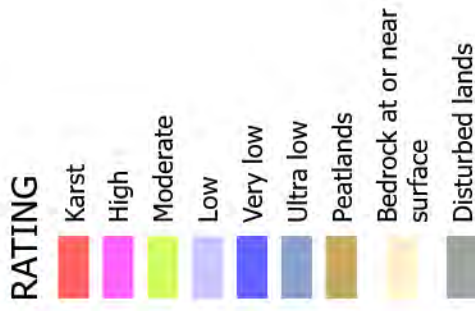
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Pollution Sensitivity of Near-Surface Materials



Legend



WELL OR BORING LOCATION

County Name

Dakota Co.

MINNESOTA DEPARTMENT OF HEALTH

WELL AND BORING RECORD

Minnesota Statutes, Chapter 103I

MINNESOTA UNIQUE WELL
AND BORING NO.

751667

Township Name **Randolph** Township No. **112N** Range No. **18W** Section No. **1** Fraction **SW NW SE**

WELL/BORING DEPTH (completed)

265ft.

DATE WORK COMPLETED

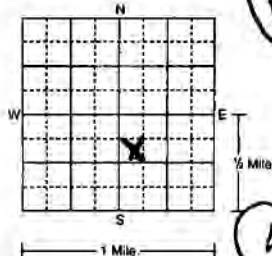
April 17th. 2008

GPS LOCATION: Latitude _____ degrees _____ minutes _____ seconds _____
Longitude _____ degrees _____ minutes _____ seconds _____

House Number, Street Name, City, and Zip Code of Well Location

or Fire Number

Show exact location of well/boring in section with "X."

Sketch map of well/boring location.
Showing property lines,
roads, buildings, and direction.

DRILLING METHOD

☐ Cable Tool
☐ Auger
☐

☐ Driven
☒ Rotary

☐ Dug
☐ Jetted

DRILLING FLUID

Bentonite/Foam

WELL HYDROFRACTURED? ☐ Yes ☒ No

From _____ ft. To _____ ft.

USE

☐ Domestic
☐ Noncommunity PWS
☐ Community PWS
☐ Elevator

☐ Monitoring
☐ Environ. Bore Hole
☒ Irrigation
☒ Dewatering

☐ Heating/Cooling
☐ Industry/Commercial
☐ Remedial

CASING MATERIAL

☒ Steel
☐ Plastic

Drive Shoe? ☒ Yes ☐ No
☐ Threaded ☒ Welded

HOLE DIAM.

CASING Diameter

18 in.

to 32 ft.

Weight

70.59 lbs./ft.

Specifications

24 in. to 32 ft.

17 in. to 265 ft.

SCREEN

Make _____

Type _____

Slot/Gauze _____

Set between _____ ft. and _____ ft.

OPEN HOLE

From 32 ft.

To 265 ft.

Diam. _____

Length _____

Fittings _____

STATIC WATER LEVEL

18 ft.

Below ☒ Above land surface

Measured from

Date measured

2/08/08

PUMPING LEVEL (below land surface)

160 ft.

after 3 hrs.

pumping 800 g.p.m.

WELLHEAD COMPLETION

☐ Pitless/adaptor manufacturer _____

Model _____

☐ Casing Protection _____☒ 12 in. above grade☐ At-grade (Environmental Well and Boring ONLY)

GROUTING INFORMATION

Well grouted ☒ Yes ☐ No

Grout materials

☒ Neat cement ☐ Bentonite ☐ Concrete ☐ Other _____

From 0 ft.

To 32 ft.

3 Yds.

☒ Bags

From _____ ft.

To _____ ft.

Yds.

☐ Bags

From _____ ft.

To _____ ft.

Yds.

☐ Bags

NEAREST KNOWN SOURCE OF CONTAMINATION

1,400 feet

East direction

Septic type

Well disinfected upon completion? ☒ Yes ☐ No

PUMP

☐ Not installed

Date installed

April 17th. 2008

Manufacturer's name

700

Model Number

700-60-ST8

HP

60

Volts

460

Length of drop pipe

147ft. 6"

ft.

Capacity

700

g.p.m.

Type

☒ Submersible☐ L.S. Turbine☐ Reciprocating☐ Jet☐

ABANDONED WELLS

Does property have any not in use and not sealed well(s)?

☐ Yes☒ No

VARIANCE

Was a variance granted from the MDH for this well?

☐ Yes☒ No

TN# _____

WELL CONTRACTOR CERTIFICATION

This well was drilled under my supervision and in accordance with Minnesota Rules, Chapter 4725. The information contained in this report is true to the best of my knowledge.

Kimmes-Bauer Well Drilling, Inc. #1540

Licensee Business Name

Lic. or Reg. No.

Aaron Bauer
Certified Representative Signature

1240

4/17/08

Certified Rep. No.

Date

Aaron Bauer

2/08/08

Name of Driller

LOCAL COPY

751667

June 24, 2025

Jon Radermacher
City Administrator
City of Cannon Falls
918 River Road
Cannon Falls, MN 55009

SUBJECT: Cannon Falls Industrial Draft AUAR
MnDOT Review #**AUAR25-004**
Between US 52, CSAH 86/CSAH 29, and PGR RR
Cannon Falls, Dakota County

Dear Jon Radermacher,

Thank you for the opportunity to review the Cannon Falls Industrial Draft AUAR. Please note that MnDOT's review of this AUAR does not constitute approval of a regional traffic analysis and is not a specific approval for access or new roadway improvements. As plans are refined, we would like the opportunity to coordinate with our partners and to review the updated information. MnDOT's staff has reviewed the document and has the following comments:

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.

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.

Review Submittal Options

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.

You are welcome to contact me at regina.burstein@state.mn.us with any questions.

Sincerely,

Regina Burstein
Senior Planner

Copy sent via email:

Jason Swenson, Water Resources
Buck Craig, Permits
Mark Lundquist, Right of Way
Ashley Hansen, Traffic
Amrish Patel, Transit
Robert Jones, South Area Manager
Mohammad Dehdashti, Design

Michael Kowski, Maintenance
Molly McCormick, Ped/Bike/ADA Planning
Brandon Nelson, Surveying
Tod Sherman, Planning
Cameron Muhic, Planning
Scott Shaffer, Planning
Joseph Widing, Metropolitan Council

June 18, 2025

VIA EMAIL

Jon Radermacher
City of Cannon Falls
918 River Road
Cannon Falls, Minnesota 55009
cityadmin@cannonfallsmn.gov

RE: Cannon Falls Industrial – Urban Areawide Review

Dear: Jon Radermacher

Thank you for the opportunity to review and comment on the Alternative Urban Areawide Review (AUAR) for the Cannon Falls Industrial project (Project) located in Dakota and Goodhue County, Minnesota. The Project consists of an area totaling approximately 253 acres across 5 parcels in Randolph Township and the City of Cannon Falls, Dakota and Goodhue Counties, Minnesota. MNLCO Dakota County Two, LLC and MNLCO Dakota County Three, LLC are proposing to develop the study area from existing farmland to industrial or technology park uses. Prior to development, the portion of the study area currently in Randolph Township will be annexed into the City of Cannon Falls, rezoned first to “urban reserve,” then rezoned to “I2 - General Industrial” with a Planned Unit Development Overlay. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

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. [...].
- 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.
- 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 should evaluate whether the project will have impacts at those residential locations that would exceed the NAC 1 standards in Minn. R. 7030.0040.
- 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 (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 noise section of the EAW 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.

- MPCA strongly recommends the proposer conduct a noise study and potentially evaluate methods to mitigate noise impacts to any nearby residential locations.

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.
- 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.
- 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.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit actions by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this AUAR, please contact me by email at chris.green@state.mn.us or by telephone at 507-476-4258.

Sincerely,

Chris Green

This document has been electronically signed.

Chris Green, Project Manager

Environmental Review Unit

Resource Management and Assistance Division

CG:rs

Attachment

cc: Dan Card, MPCA

cc continued next page

Jon Radermacher

Page 3

June 18, 2025

Melinda Neville, MPCA
Nicole Peterson, MPCA
Matthew Moon, MPCA
Jeffrey Hedman, MPCA
Lauren Dickerson, MPCA
Deepa deAlwis, MPCA
Innocent Eyoh, MPCA
David Sahli, MPCA
Julie Henderson, MPCA

From: [Jon Rademacher](#)
To: [Payne, Ashley](#); [Bill Angerman](#)
Subject: Fw: Attn: Jon Rademacher re Data Center
Date: Wednesday, June 25, 2025 8:23:48 AM
Attachments: [Outlook-v1vj2x44.png](#)

AUAR comment

Jon Rademacher

City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: kari@duplexchick.com <kari@duplexchick.com>
Sent: Tuesday, June 24, 2025 3:57:49 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>
Subject: Attn: Jon Rademacher re Data Center

Kari Lundin
9225 260th St E
Cannon Falls, MN 55009
612-290-5998
kari@duplexchick.com

Dear Jon,

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.

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.

Kari Lundin

Kari Lundin

Keller Williams Realty Integrity - Edina

7401 Metro Blvd, Ste 350

Edina, MN 55439

612-290-5998

www.duplexchick.com

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Or text KW2MPUB3G to 87778



From: [Jon Radermacher](#)
To: [Payne, Ashley](#); [Bill Angerman](#)
Subject: Fw: Request for Extended Public Comment Period and Revisions to Cannon Falls Industrial AUAR
Date: Thursday, June 26, 2025 7:33:36 AM

Ashley,

This one has a request to extend the public comment period, please advise how to respond.

Jon Radermacher
City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Megan Bauer <bauer.megan.r@gmail.com>
Sent: Wednesday, June 25, 2025 9:11:35 PM
To: info@cannonfallstechnologypark.com <info@cannonfallstechnologypark.com>; Jon Radermacher <cityadmin@cannonfallsmn.gov>
Subject: Request for Extended Public Comment Period and Revisions to Cannon Falls Industrial AUAR

Good evening,

I hope this message finds you well. My name is Megan Bauer, and I'm writing to share several serious concerns regarding the draft [Cannon Falls Industrial Alternative Urban Area Review \(AUAR\)](#). I respectfully urge you to consider these points and take action to strengthen the environmental review process and ensure meaningful public participation.

1. 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.

2. 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.

3. 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 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.

4. 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.

5. 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.

6. 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 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.

Thank you for your time and attention. I look forward to your response and the opportunity for further public involvement.

Sincerely,
Megan Bauer

From: [Jon Radermacher](#)
To: [Payne, Ashley](#); [Bill Angerman](#)
Subject: Fw: Data Center
Date: Thursday, June 26, 2025 7:29:49 AM

Public comment for the AUAR

Jon Radermacher
City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: ann buselmeier <bezbuse1@yahoo.com>
Sent: Wednesday, June 25, 2025 9:39:59 PM
To: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Subject: Re: Data Center

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. Ann Bezdichek Buselmeier

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, June 25, 2025, 9:55 AM, Jon Radermacher <cityadmin@cannonfallsmn.gov> wrote:

Ann,

Thank you for sharing your feedback, and I'm sorry you felt like the information wasn't easy to find we will work on that. Hearing feedback helps us to know to make changes.

I will also pass along your feedback to the Tract representatives, they have asked and offered to find ways to engage with the community and answer questions. Additionally, we're just getting into the process with the Planning Commission and City Council where there will be Public Hearings as parts of the decision making process.

Finally, I want to make sure you know about the AUAR study,
https://www.cannonfallsmn.gov/sites/default/files/fileattachments/community/page/8079/cannon_falls_industrial_auar_20250520.pdf,
and that public comments for the record in the AUAR are due tomorrow.

Sincerely,

Jon Radermacher

City Administrator



cityadmin@cannonfallsmn.gov
507-263-9304

Peter Drucker: "Management is doing things right; leadership is doing the right things."

From: ann buselmeier <bezbuse1@yahoo.com>
Sent: Wednesday, June 25, 2025 9:23 AM
To: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Subject: Data Center

Good morning. I was dedicating my morning to reading data center documents, so I went to the Cannon Falls City site. Nothing there that I could readily find. So I called the city, to find out it's under technology park. I'd like to suggest to put the data center on the home page of cannon falls, directing the user, with a link to the technology park. Make the info readily available, easy to search and find.

Also. I saw that tract had a luncheon meeting with the chamber of commerce. (I think it was the chamber). This type of meeting should be offered to the citizens of Cannon Falls and interested parties. A venue where a question can be asked,

and All attendees can hear the same answer. The open house held on 4/29, was, was, very very disjointed, cumbersome to wait in line to gain access to a representative from tract. And yes a public hearing was held, but I felt it was held in a small venue and discouraged attendees to really access the information. I'd like you to consider holding a town meeting, well advertised, in the gym at the high school. Give the citizens and interested parties, a chance to really hear and participate in an open dialogue with tract.
Thank you for your time and consideration

Ann Bezdichek Buselmeier
6658 296th Street East
Cannon Falls
6125087518

[Sent from Yahoo Mail for iPhone](#)

From: [Jon Radermacher](#)
To: bangerman@whks.com; [Payne, Ashley](#)
Subject: FW: Cannon Falls Alternative Urban Areawide Review AUAR comments and questions
Date: Tuesday, June 24, 2025 11:48:27 AM

Ashley,

Here are some comments on the AUAR that I received today.

Jon Radermacher

City Administrator



cityadmin@cannonfallsmn.gov
507-263-9304

Peter Drucker: "Management is doing things right; leadership is doing the right things."

From: RJ Davisson <davissonrj@verizon.net>
Sent: Tuesday, June 24, 2025 11:22 AM
To: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Subject: Cannon Falls Alternative Urban Areawide Review AUAR comments and questions

Jon,

Here are some comments and questions regarding the Cannon Falls Industrial Alternative Urban Areawide Review (AUAR) dated May 2025.

Development Scenarios - Page 8 indicates a potential development scenario of "1,750,000 sq ft" of light industrial use. Again, on page 51 the developer's input states, "Scenario 1 is proposed light industrial..." 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 are 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.

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 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.

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."

Page 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 allowed 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 the developer's current proposal of an I-2 General Industrial zone usage.

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."

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 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?

Figure 15. Groundwater Resources

Old Castle-Hancock

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?

* 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?

Other Properties - their water comes from somewhere

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 aquifer(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).

Fire Protection

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?

* 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

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?

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?

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

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?

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?

>> RJ Davisson

From: [Payne, Ashley](#)
To: [Janso, Chelsey](#)
Subject: FW: Cannon Falls Data Center Proposal
Date: Thursday, June 26, 2025 1:02:12 PM

Ashley Payne

Kimley-Horn

Direct: 507 216 0763 | Mobile: 507 251 6096

From: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Sent: Thursday, June 26, 2025 12:46 PM
To: Payne, Ashley <Ashley.Payne@kimley-horn.com>; Bill Angerman <bangerman@whks.com>
Subject: Fw: Cannon Falls Data Center Proposal

Jon Radermacher

City Administrator

City of Cannon Falls

cityadmin@cannonfallsmn.gov

507-263-9304

From: Julie Maidment <jamrides76@gmail.com>
Sent: Thursday, June 26, 2025 12:17:17 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>
Subject: Cannon Falls Data Center Proposal

Dear Mr. Radermacher,

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.

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?

Thank you,
Julie Maidment

From: [Jon Radermacher](#)
To: [Payne, Ashley](#); bangerman@whks.com
Subject: FW: Tract / Cannon Falls AUAR Comments
Date: Friday, June 6, 2025 11:22:42 AM

AUAR Comment from John Wiick

Jon Radermacher

City Administrator



cityadmin@cannonfallsmn.gov

507-263-9304

Peter Drucker: "Management is doing things right; leadership is doing the right things."

From: wiik@jlwdesignllc.com <wiik@jlwdesignllc.com>
Sent: Friday, June 6, 2025 10:51 AM
To: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Subject: Tract / Cannon Falls AUAR Comments

City of Cannon Falls
City Administrator
918 River Road
Cannon Falls, MN 55009

Mr. Radermacher,

I would like to submit the following comments for the Tract / Cannon Falls AUAR.

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.

Sincerely,

John Wiik

28388 Henderson Way
Randolph, MN 55065

From: [Jon Radermacher](#)
To: [Payne, Ashley](#); [Bill Angerman](#)
Subject: Fw: Cannon Falls Data Center Proposal
Date: Thursday, June 26, 2025 6:29:17 PM

Jon Radermacher

City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Ronald Maidment <ronaldmaidment279@gmail.com>
Sent: Thursday, June 26, 2025 5:14:23 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>
Subject: Cannon Falls Data Center Proposal

Dear Mr. Radermacher,

I am a taxpaying resident of Cannon Falls. My wife and I moved here in 2005.

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.

As City Administrator your concerns are first and foremost for the quality of life to those who reside in Cannon Falls which at present is excellent.

Thank you,
Ron Maidment

From: [Jon Radermacher](#)
To: [Payne, Ashley](#); [Bill Angerman](#)
Subject: Fw: AUAR comments
Date: Thursday, June 26, 2025 6:29:06 PM

Jon Radermacher

City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Jacob Kostrzewski <kostrzewski.jacob@gmail.com>
Sent: Thursday, June 26, 2025 5:47:58 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>
Cc: info@cannonfallstechnologypark.com <info@cannonfallstechnologypark.com>
Subject: AUAR comments

Hello,

Please consider this email my comment on the AUAR and the related data center.

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 the approval of this technology park.

From: [Payne, Ashley](#)
To: [Janso, Chelsey](#)
Subject: Fw: Public Comment regarding Cannon Falls Industrial Alternative Urban Area Review (AUAR)
Date: Friday, June 27, 2025 9:02:27 AM

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From: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Sent: Friday, June 27, 2025 7:38:22 AM
To: Payne, Ashley <Ashley.Payne@kimley-horn.com>; Bill Angerman <bangerman@whks.com>
Subject: Fw: Public Comment regarding Cannon Falls Industrial Alternative Urban Area Review (AUAR)

Jon Radermacher
City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Ginger Bauer - La Boutique Unique <bauer.ginger@gmail.com>
Sent: Thursday, June 26, 2025 10:26:57 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>;
info@cannonfallstechnologypark.com <info@cannonfallstechnologypark.com>
Subject: Public Comment regarding Cannon Falls Industrial Alternative Urban Area Review (AUAR)

My name is Ginger Bauer. I am a resident of Cannon Falls. This letter is in regard to the Cannon Falls Industrial Alternative Urban Area Review (AUAR).

I attended the May 20, 2025 City of Cannon Falls Joint City Council & Planning Commission Work Session and the following City Council Meeting because I was interested in the discussion regarding the proposed technology park. I also attended the Information Session that the developer, Tract, hosted in April.

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 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.

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.

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 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.**

Thank you for your time and attention. I look forward to your response and the opportunity to be further involved.

Regards,
Ginger Bauer

From: [Payne, Ashley](#)
To: [Janso, Chelsey](#)
Subject: Fw: Data center public comment
Date: Friday, June 27, 2025 9:02:35 AM

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From: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Sent: Friday, June 27, 2025 7:37:20 AM
To: Payne, Ashley <Ashley.Payne@kimley-horn.com>; Bill Angerman <bangerman@whks.com>
Subject: Fw: Data center public comment

Jon Radermacher
City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Lisa Anderson <lisa.hermanson@gmail.com>
Sent: Thursday, June 26, 2025 2:31:24 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>;
info@cannonfallstechnologypark.com <info@cannonfallstechnologypark.com>
Subject: Data center public comment

Good afternoon,

I'm writing to voice my concern about the proposed data center. As a resident of Cannon Falls, I do not feel there has been sufficient information about the proposed data center made available, especially given the very quick timeline it seems to be on. I just today found out about the public comment period.

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 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.

Thank you,

Lisa Anderson

Subject: Data center public comment

Good afternoon,

I'm writing to voice my concern about the proposed data center. As a resident of Cannon Falls, I do not feel there has been sufficient information about the proposed data center made available, especially given the very quick timeline it seems to be on. I just today found out about the public comment period.

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 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.

Thank you,

Lisa Anderson

From: [Payne, Ashley](#)
To: [Janso, Chelsey](#)
Subject: Fw: Public comment on data center environmental review
Date: Friday, June 27, 2025 9:02:46 AM

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From: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Sent: Friday, June 27, 2025 7:37:03 AM
To: Payne, Ashley <Ashley.Payne@kimley-horn.com>; Bill Angerman <bangerman@whks.com>
Subject: Fw: Public comment on data center environmental review

These comments were also received yesterday, and I just released them from our spam filter.

Jon Radermacher
City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Alan Muller <amuller@dca.net>
Sent: Thursday, June 26, 2025 11:36:17 PM
To: mmontgomery@cannonfallsmn.gov <mmontgomery@cannonfallsmn.gov>;
cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>
Subject: Public comment on data center environmental review

Alan Muller
1110 West Avenue
Red Wing, MN, 55066
302.299.6783
amuller@dca.net

June 26, 2025

Matt Montgomery, Mayor, mmontgomery@cannonfallsmn.gov
Jon Radermacher, City Administrator, cityadmin@cannonfallsmn.gov
City of Cannon Falls, Minnesota, 550091

Regarding: "Cannon Falls Technology Park"--(Alternative Urban Area Review)

Gentlemen:

Kindly accept these comments on the above matter.

Excellent comments have been submitted by Carol Overland and Megan Bauer. I endorse them without repeating them here.

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.

1

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.1 Approximately 150 worksheets are completed each 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.

Suggestions:

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.

Respectfully submitted,

[signed]

Alan Muller

From: [Payne, Ashley](#)
To: [Janso, Chelsey](#)
Subject: Fw: Technology Park / Data Center Concerns
Date: Friday, June 27, 2025 9:02:54 AM

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From: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Sent: Friday, June 27, 2025 7:34:42 AM
To: Payne, Ashley <Ashley.Payne@kimley-horn.com>; Bill Angerman <bangerman@whks.com>
Subject: Fw: Technology Park / Data Center Concerns

This comment was submitted yesterday

Jon Radermacher
City Administrator
City of Cannon Falls
cityadmin@cannonfallsmn.gov
507-263-9304

From: Emily Peterson <petersemi59@gmail.com>
Sent: Thursday, June 26, 2025 9:30:56 PM
To: cityadmin@cannonfallsmn.gov <cityadmin@cannonfallsmn.gov>;
info@cannonfallstechnologypark.com <info@cannonfallstechnologypark.com>
Subject: Technology Park / Data Center Concerns

Dear Mr. Radermacher and Project Team:

I am writing to express my concerns about the AUAR for the proposed Technology Park.

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 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.

Thank you for your consideration of these concerns.

Emily Peterson
32487 County 24 Blvd
Cannon Falls, MN 55009
612-325-3825



From: Jon Radermacher
To: Payne, Ashley; bangerman@whks.com; Daren Sikkink
Subject: FW: Comments on Draft AUAR - Initial Comments
Date: Wednesday, June 18, 2025 9:01:32 AM
Attachments: [image005.png](#)
[image006.png](#)

FYI, initial comments on AUAR

Ashley,

Will you be preparing a response for this comment? Can you share that with me, and is there something missing in terms of what should be on our website for review? The Draft AUAR?

Jon Radermacher
City Administrator



cityadmin@cannonfallsmn.gov
507-263-9304

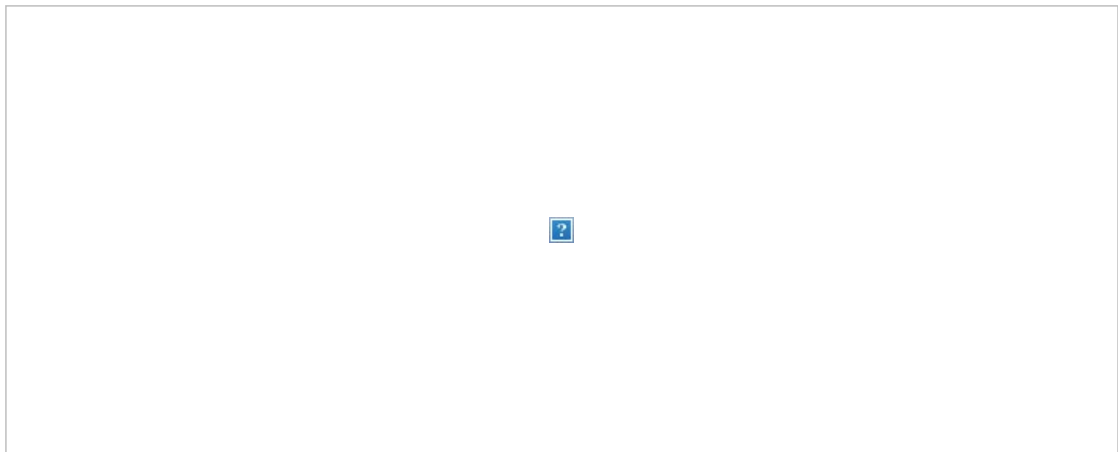
Peter Drucker: "Management is doing things right; leadership is doing the right things."

From: Carol A. Overland <overland@legalelectric.org>
Sent: Wednesday, June 18, 2025 8:20 AM
To: Jon Radermacher <cityadmin@cannonfallsmn.gov>
Subject: Comments on Draft AUAR - Initial Comments

Jon -

Please regard this as my Initial Comment on the AUAR.

While waiting for you to get it together on the late response to my earlier Data Practices Act Request, I'm taking a few minutes to look at the Draft AUAR. From the City's AUAR page, this is all that's there:

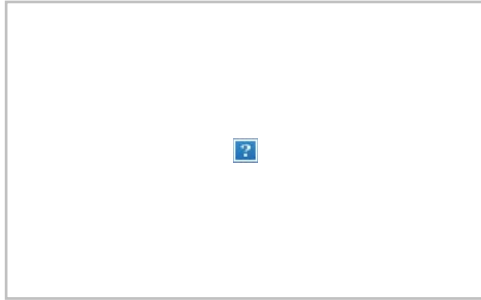


1) There's NOTHING on the Cannon Falls AUAR page about availability of the Draft AUAR; there's no ID of the linked 5-20-2025 AUAR as the DRAFT available for comment; and there's nothing stating that the process includes commenting on the draft, when comments are due, and where to send them.

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-PROJ0000000001>)

2) 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) 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/>

More to follow.

Carol A. Overland, as individual, and not in the course of representation of any client

--

"Our lives begin to end the day we become silent
about the things that matter." Dr. Martin Luther King, Jr.

Carol A. Overland
Attorney at Law
Legalelectric - Overland Law Office
1110 West Avenue
Red Wing, MN 55066

612-227-8638

overland@legalelectric.org

www.legalelectric.org

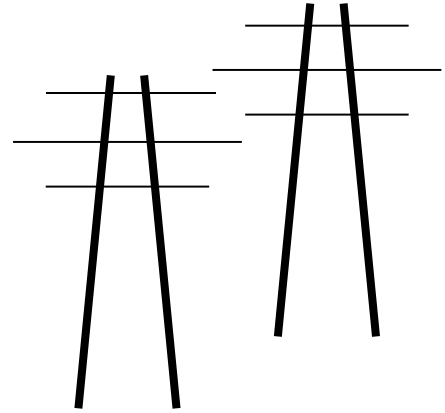
www.nocapx2020.info

www.not-so-great-northern-transmission-line.org

Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617
Energy Consultant—Transmission, Power Plants, Nuclear Waste
overland@legalelectric.org

1110 West Avenue
Red Wing, Minnesota 55066
612.227.8638



June 26, 2025

John Radermacher
City Administrator
918 River Road
Cannon Falls, MN 55009

via email: cityadmin@cannonfallsmn.gov

Randolph Township
P.O. Box 87
Randolph, MN 55065

via email: Clerk@randolph-township.com

Environmental Review Team
and
Environmental Quality Board Members
520 Lafayette Road
St. Paul, MN 55155

via email: info.eqb@state.mn.us

RE: Comments on Draft AUAR – TRACT Data Center

Dear Mr. Radermacher, EQB Environmental Review Team and EQB Board members:

Below are my comments. I am filing this as an individual, and not in the course of representing any client. Should that change, you will be immediately notified.

Information including data center site plans, survey, City/Township and Tract meeting agenda and minutes, emails, Tract PR handouts, etc., obtained Tuesday, June 24, 2025 in partial response to a Data Practices Act Request, may be found on my Legalelectric site: [Tract Data Center in Cannon Falls](#)¹. This information has previously not been disclosed to the public, with the exception of one proposed project schedule that was included in a Council/Planning Commission packet (though not a handout).

I. USE OF AUAR IS DISENGENUOUS AND DECEPTIVE

For the record, I am sending this Comment and attachments to the Environmental Quality Board

¹ If that link doesn't work: <https://legalelectric.org/weblog/29201/>

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. See Minn. R. 4410.3600. The project is for a data center, that is clear. Much known information that is necessary for an EIS is not disclosed in this “AUAR” and has been hidden from the public. It is impossible to determine and evaluate impacts without this information, information such as water use, energy use, air emissions from diesel generators, noise and setbacks necessary to reduce noise to comply with Minnesota’s industrial noise standards. It does not address the range of impacts based on known characteristics of the data center project, cumulative impacts, and it is dishonest to claim it is a comparison of 2 or more projects. Use of an AUAR in an attempt to avoid an EIS is not a legitimate use of an AUAR. The City of Cannon Falls and Tract have not provided full disclosure of known information, and the decision to use an AUAR was made on provision of incomplete information. Minn. R. 4410.3600, Subp. 1.

While AUARs were designed for “residential, commercial, warehousing, and light industrial development and associated infrastructure uses,” and technology centers, a/k/a data centers, were not an anticipated use for AUAR review. Minn. R. 4410.3610, Subp. 1. Further:

The procedures of this part may not be used to review any project meeting the requirements for a mandatory EAW in part [4410.4300](#), subparts 2 to 13, 15 to 17, 18, item C, D, or E, or 24, or a mandatory EIS in part [4410.4400](#), subparts 2 to 10, 12, 13, or 25.

Id. However, as noted by Minnesota Center for Environmental Advocacy (MCEA) in a letter to the legislature about HF28², regarding a proposed exemption for the Becker data center from Public Utilities Commission review:

... the AUAR process is being used instead to allow large data center developments to conceal their ownership and other information from the public during the environmental review process.

MCEA Letter to House Energy Committee.

Completion of an AUAR provides exemption for further environmental review only under specific conditions:

Upon completion of review under this part, residential, commercial, warehousing, and light industrial development projects and associated infrastructure within the boundaries established under subpart 3 that are consistent with development assumptions established under subpart 3 are exempt from review under parts [4410.1100](#) to [4410.1700](#) and [4410.2100](#) to [4410.3000](#) as long as the approval and construction of the project complies with the conditions of the plan for mitigation developed under subpart 5.

Id., Subp. 5(E). This situation is not one of those scenarios for exemption from environmental

² See <https://www.house.mn.gov/comm/docs/-TaXdzuaxkispYDJF2f5UQ.pdf> This was a scenario of 250 diesel generators that would produce 600MW, or ~ 2.4MW each.

review.

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.

II. INADEQUATE NOTICE OF DRAFT AUAR – EXTEND COMMENT DEADLINE

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?

The City of Cannon Falls website's AUAR page³ says absolutely nothing about public comment and deadline for comments:

AUAR (Alternative Urban Area Review)

The Scoping Documents for the **Alternative Urban Area Review (AUAR)** have been posted to the Minnesota Pollution Control Agency's Environmental Quality Board which you can find [here](#).

We'd love to hear from you! Please contact our team at info@CannonFallsTechnologyPark.com or call 507.298.2864 with any questions.

Supporting Documents

-  Cannon Falls Industrial AUAR Final Order (5 MB)
-  Cannon Falls Industrial AUAR 05-20-2025 (18 MB)

On the other hand, Randolph Township shows this information front and center on its home page⁴ (and on yet another hand, there is nothing in the Board or Planning Commission minutes regarding the data center and pending annexation):



³ See <https://www.cannonfallsmn.gov/community/page/auar-alternative-urban-area-review>

⁴ See www.randolph-township.com

The **Draft AUAR** lists the City of Cannon Falls as the Responsible Governmental Unit, but gives no information of RGU responsibilities and no information on commenting – there is no information even stating that there is a comment period, nothing regarding the start and closing of the comment period, although perhaps one could presume the City Administrator should receive public comments. Draft AUAR, p. 4.

The word “comment” does not appear in the AUAR until p. 71, and this is the ONLY time that the word “comment” appears in the DRAFT AUAR!:

Draft Mitigation Plan

This Mitigation Plan is submitted as part of the Draft AUAR to provide reviewers and regulators with an understanding of the actions that are advisable, recommended, or necessary to protect the environment and minimize potential impacts by the proposed development scenarios. This Draft Mitigation Plan will be revised and updated based on comments received during the Draft AUAR comment period.

DRAFT AUAR, p. 71. There has been no good faith effort to provide notice to the public.

The public has this one opportunity to comment on the Draft AUAR, yet what’s visible is an abject failure of notice to the public. Notice needs a do-over, another 30 days to comment with **PROMINENT** info that there is a Draft AUAR available for public comment, and the date of the close of the comment period, accompanied with a link to the AUAR.

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.

III. THE AUAR CONTENT IS DEFICIENT IN MANY RESPECTS

The AUAR is inadequate as it does not provide basic information necessary to determine potential impacts.

A. 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:



AUAR, p. 11.

This is the site plan found June 24, 2025 in the Data Practices Act Responses and it is NOT found in the AUAR:



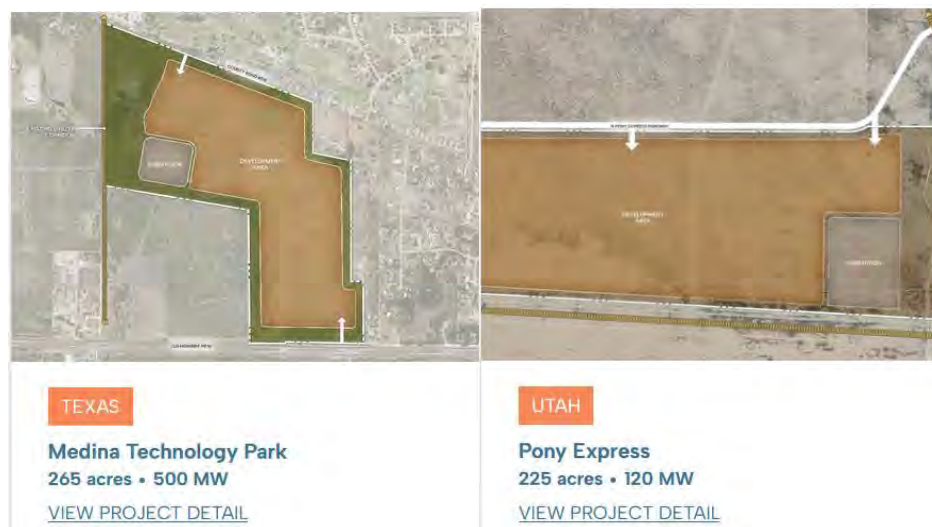
See Attachment A – Site Plan. Let's be honest here – this is the site plan for the Tract data center.

B. ENERGY USE AND DIESEL GENERATORS MUST BE QUANTIFIED

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 Amazon data center in Becker anticipated use of 250 generators that would produce 600MW, or about 2.4 MW each.⁵ How many megawatts and diesel generators for Tract? A look at Tract's website shows two "small" projects covering acreage near that of the approximately 250 acres for the Cannon Falls project. These are the 500MW Medina project near San Antonio, and the 120MW Pony Express near Salt Lake City.



A logical estimate is that the Cannon Falls project would be in the range of 120MW to 500MW, above the Minnesota PUC's 50MW threshold for a Certificate of Need.⁶ Heightened environmental review appears attempted to be avoided by non-disclosure in this diversionary and improper use of AUAR.

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.

⁵⁵ <https://www.msn.com/en-us/news/us/amazon-must-prove-it-needs-250-diesel-generators-at-becker-data-center-minnesota-utility-regulators-say/ar-AA1A0O8w>

⁶ See certificate of need (CN) requirements in Minn. Stat. § 216B.243 and Minn. R. Ch. 7849.

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.

C. WATER SOURCE, CONSUMPTION, AND DISCHARGE SPECIFICS MUST BE DISCLOSED, CUMULATIVE IMPACTS BE DETERMINED

The AUAR is inadequate because it discusses water resources, wastewater, stormwater, and gives short shift to water appropriation.:

The water supply for the study area will be obtained from the City of Cannon Falls in both Scenarios, however, in Scenario 2, the industrial water could be supplied from the onsite irrigation well that would be reconstructed to municipal standards. The City provides water to residents from three groundwater wells ranging from 393 to 400 feet deep that draw water from the Jordan and Jordan-St. Lawrence aquifers.¹⁶ The City of Cannon Falls currently has a water appropriation capacity of 250 MGY and is currently utilizing between 151 to 165 MGY over a four-year period from 2019 to 2024. The city is currently reviewing how the existing appropriations and well could work within the city to help shave some peak demand from the City's water system.

AUAR, p. 51. Water appropriation needs and sources must be disclosed beyond the scant "Scenario 2" information provided:

Under Scenario 2, the onsite well could alternatively be reconstructed to meet industrial standards and utilized for industrial process water, reducing the demand from the development on the City water supply system.

Data centers can have a wide range of cooling options which impact the water demand depending on either the use of a non-water cooled or a water-cooled system. It is assumed that Scenario 2 is a water-cooled system and could have an annual peak water demand of 49 MGY with a peak day of 4.66 million gallons per day when temperatures exceed 100 plus degrees Fahrenheit during the day. Annual average daily water demands are anticipated to be approximately 0.135 MGD for the development, including both domestic and cooling water.

The MNDNR has monitoring wells throughout the state that detects groundwater levels in the aquifer. DNR Observation Well Number 19062 is the closest monitoring well to the site and has a depth of approximately 395 feet above sea level. This well has fluctuated between an elevation of 824 feet in 1994, to a high of 867 feet in 2013. In the last few years, the well has gone from 835 feet in May of 2023, to an elevation of 837 feet in March of 2025. This fluctuation does show the variation of the aquifer with the rain and other seasonal events, but the last 30 years of data shows the aquifer maintains a consistent groundwater elevation within this range. This demonstrates that the aquifer is a reliable and resilient water source with the seasons and does recharge over time.

A Water Use Appropriation Permit would be obtained if temporary dewatering is determined to be necessary for design of development in Scenario 1 or Scenario 2. A Water Use Appropriation Permit is required for temporary water appropriations and limits withdraw to 50 million gallons per year.

Id., p. 52. Note claim of 49MGY where DNR Water Use Appropriation Permit has 50MGY limit!

There are several known projects proposed in the area. To address cumulative impacts, all projects drawing water out of the aquifer must be taken into account, and a sustainable manner of equitable allocation between the many projects be determined that can be flexible as need and availability changes. A wide range pump test should be utilized to determine sustainability of individual and the many projects.

An email from the Data Practices Act Request reveals details for this project that should all be included in the AUAR:

Neil and Laura – Per our previous discussions, following is a summary of City data and information. Much of this information will be incorporated into Tract's AUAR.

Water Supply and Storage

- Ground water appropriation, the City's authorized volume is 250 MGY. In 2023 the City used 157 MGY.
- Storage Capacity, City has two storage tanks; 500,000 gallon ground storage and 1,000,000 gallon elevated storage
 - o City needs storage equal to average day demand which was 430,000 gpd in 2023.
 - o City has approximately 1.07 MG available before more storage is needed.
- Well capacity, City has three wells with a firm (largest well out of service) capacity of 3.2 MGD.
 - o City needs well capacity equal to peak day demand. Peak day was approximately 930,000 in 2023
 - o City has approximately 2.3 MG available before more well capacity is needed.
- Water quality
 - o See water quality data that was previously provided to Tract. City feeds chlorine (disinfection), fluoride (health), and polyphosphate (iron sequestration)

Water Distribution System

- Pressure and fire flow
 - o City can provide static pressure near the site if requested.
 - o City can perform a fire flow test if requested.
 - o Water modeling of the distribution system may be required depending upon volumes requested.
 - o Tract will most likely need to loop watermain to the site from the south near Highway 20/County Road 29 and from the north at Holiday Ave. This will depend on water volume needed and fire flow requirements.
 - o Tract will need to evaluate if constructing water storage on site is warranted.

Wastewater Treatment

- Plants rated capacities are: AWW (1.09 MGD), MWW (2.18 MGD), PHWW (3.27 MGD)
- Current flows available based on 2022 data, AWW (0.7 MGD), MWW (1.2 MGD), PHWW (no data)
- A treatment plant plan (facilities plan) may be need to be prepared by the City depending upon requested flows.

Wastewater Collection System

- Sewer capacity along Highway 20 will need to be evaluated. Pipe sizes range from 8" to 18". Capacity available will depend upon flow requested. Suggestion is the City perform CCTV of all existing pipe to determine condition now.
- Lift Station capacity. All of the Tract Development land flows to the new lift station at the intersection of Cannon and 3rd. It has an ultimate firm capacity of 2,000 gpm or 2.88 MGD. Current capacity is 900 gpm or 1.3 MGD. This lift station is new so data is not available but assumption is lift station is about 25% utilized currently.

Attachment B, email from Angerman re: Tract Development Utilities, November 8, 2024.

The punchline is on the second page, the information needed from Tract, information that is not in the AUAR:

What we will need from Tract.

- Projected water usage. Peak day and average day.
- Projected wastewater discharge in the form of AWW, MWW, PHWW.
- Projected wastewater discharge strength for the following: BOD, TSS, P, Chlorides, Sulfates, Metals, TKN, and potentially others.

Id.

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.

D. PROJECT SETBACKS ARE NOT EVEN MENTIONED IN THE AUAR!

A search of the AUAR reveals that project setbacks are not even mentioned. Setbacks are a common means of environmental mitigation to address impacts that cannot be avoided. Setbacks are needed to prevent impacts of nuisance noise, lighting, air emissions, etc.

The site plan, again, NOT incorporated into the AUAR, reveals that Tract has proposed insufficient setbacks on the north side of the parcel up against a residential development. See Attachment A – Site Plan. That plan shows 200 – 300 foot setbacks from the property line and residences to the north, 300 foot setbacks for an 80 foot building.

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.

E. VISUAL IMPACTS OF A COMPLEX OF 80 FOOT TALL BUILDINGS IS NOT ADDRESSED

The AUAR minimizes the visual impacts of 80 foot tall buildings. See Attachment A, Site Plan. These data center buildings would loom up against the residences on the north side of the building, and would be the visual greeting to anyone approaching on Highway 52. An example of the strong unwanted visual impact of industrial facilities in an agricultural land transition to a small city is the CapX 2020 transmission and subway gateway to Hampton on Highway 52 from the south.

The AUAR proposes “to develop the entirety of the site with natural buffers along the project lines. Minimal tree clearing is anticipated for development.” AUAR, p. 56. This notion of a buffer is also raised regarding visual impacts:

Natural buffers will be maintained around the AUAR study area as feasible to minimize visual impacts to the adjacent properties. No significant visual impacts are anticipated.

AUAR, p. 60.

The notion of a natural buffer that would somehow mitigate the visual impacts of 80' tall buildings just 300 feet from residences and along the Highway 52 corridor is not credible.

The AUAR must describe in specificity and provide drawing the visual buffers that would mitigate visual impacts of the project.

F. AIR EMISSIONS AND NEED FOR AIR EMISSIONS PERMIT MUST BE DISCLOSED – AUAR MUST ALSO CREDIBLY ADDRESS GREENHOUSE GAS EMISSIONS

The AUAR does correctly state that:

Not applicable to an AUAR. If a project exceeds any of the thresholds as identified in MN Rules 4410.4300, Subpart 15, the project would be required to complete a separate environmental review through the MPCA. The MPCA would be considered the responsible government unit.

AUAR, p. 60-61.

However, while the statement above, which avoids disclosure, may be technically true, a data center project with MANY diesel generators will need air permits. The estimates of air emissions, disclosing of the number of diesel generators and expected emissions, and the disclosure of the anticipated need for an air permit from the MPCA, is essential.

As above, diesel generators emit greenhouse gas. Disclosure of the number and energy capacity of the diesel generators and expected time running for operations and testing must be disclosed. While Table 11 does have some numbers for Operational Emissions, it must be more specific with the inputs used to achieve those numbers.

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.

G. SOCIOECONOMIC IMPACTS ARE NOT ADDRESSED IN THE AUAR

The AUAR does not address socioeconomic impacts, such as impacts on the city, township, and school district tax revenues, costs to the city for infrastructure to facilitate the development, apportionment of development costs, impacts on tourism, impacts to property values and residential, commercial, and industrial property marketing impacts.

The AUAR must address the range of likely socioeconomic impacts.

H. THE AUAR DOES NOT ADEQUATELY ADDRESS NOISE

Data centers make a tremendous amount of noise, causing predictable livid local resident complaints and lawsuits. The AUAR must be proactive in addressing lowering noise levels pre-construction through choice of operational equipment including cooling. The AUAR should include a current noise monitoring study to establish ambient sound. It's impossible to address impacts without knowing what those impacts will be and it's impossible to know what noise impacts will be without disclosure.

The Minnesota Pollution Control Agency has an industrial noise standard, and the entity permitting a project is responsible for enforcement – in this case, it likely would be Cannon Falls responsible for enforcement of the noise standard.

7030.0040 NOISE STANDARDS.

Subpart 1. **Scope.** These standards describe the limiting levels of sound established on the basis of present knowledge for the preservation of public health and welfare. These standards are consistent with speech, sleep, annoyance, and hearing conservation requirements for receivers within areas grouped according to land activities by the noise area classification (NAC) system established in part 7030.0050. However, these standards do not, by themselves, identify the limiting levels of impulsive noise needed for the preservation of public health and welfare. Noise standards in subpart 2 apply to all sources.

Subp. 2. Noise standards.

Noise Area Classification	Daytime		Nighttime	
	L ₅₀	L ₁₀	L ₅₀	L ₁₀
1	60	65	50	55
2	65	70	65	70
3	75	80	75	80

Minn. R. 7030.0040.⁷

The AUAR is grossly misleading in its statement that about traffic noise generally depicting noise measurements and perceptions:

A sound increase of 3 dBA is barely noticeable by the human ear, a 5 dBA

⁷ This writer knows a fair amount about noise, having done radio, bar and concert sound for (almost) a living decades ago and having secured the first and only utility buyouts for Minnesota landowners living under a wind project. See Legalectric for Bent Tree noise studies [Bent+Tree+08+573+PostConstNoiseMonPhase+II+Report+2+7+18](https://legalelectric.org/weblog/16950/), [BentTree NoiseMonitoring 20179-135856-01](https://legalelectric.org/weblog/16950/)); Settlements [What's going on with Bent Tree?](https://legalelectric.org/weblog/17112/) at <https://legalelectric.org/weblog/16950/> and [Bent Tree Order filed by PUC](https://legalelectric.org/weblog/17112/) at <https://legalelectric.org/weblog/17112/>.

increase is clearly noticeable, and a 10 dBA increase is heard as twice as loud. For example, if the sound energy is doubled (i.e., the amount of traffic doubles), there is a 3 dBA increase in noise, which is just barely noticeable to most people. On the other hand, if traffic increases by a factor of 10, the resulting sound level will increase by about 10 dBA and be heard as twice as loud.:

AUAR, p. 65.

The problem of operational noise is ducked and no specific information is provided:

For Scenario 2, the main sources of noise include computers, ventilation systems, industrial traffic and the use of generators tested once a month and in the case of emergency. Sensitive receptors within the project site vicinity include adjacent residential houses, and businesses. Further noise evaluation will be completed as design progresses and best practices to reduce noise will be implemented for the technology park uses to ensure compliance with local and state noise regulations. Noise attenuation measures will be incorporated into project design to ensure that MPCA noise rules and City noise ordinances are followed.

AUAR, p. 66.

Noise of data centers is a frequent complaint, as noise does not respect property boundaries. Noise travels, particularly across the relatively flat land, and may well impact residences far beyond those immediately adjacent to the AUAR boundary. The AUAR should contain noise modeling showing distances from the project at which noise levels decrease to 55, 50, 45 and 40 dB(A). Because dB(C) travels further, noise modeling should also include a separate demonstration of dB(C) levels to distances needed for 55, 50, 45 and 40 dB(C). This is an example of the graphic demonstration of noise modeling results, complementing the noise modeling report (see Freeborn Wind post <https://legalelectric.org/weblog/16480/>).



Although local residents' noise complaints are typically based on their perception, receptor perception as laid out in the AUAR is not at all relevant to noise standard compliance. The MPCA's noise standard is based on measured dB(A), as above.

Some studies of data center noise have been completed, and these studies could predict material violations of Minnesota noise standards. For example, see the [Data Center Noise Study for Prince William, Fauquier, and King George Counties and the Town of Warrenton](#).⁸ Noise from the data center in that study was far above the thresholds of the Minnesota noise standard.

It's the City's job to regulate development and assure that landowners and residents have quiet enjoyment of their property. This is best achieved through precautionary regulation.

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.

I. ORDINANCE AMENDMENT CAN PROVIDE SOME MITIGATION

The project schedule anticipates zoning changes. The City should appoint an Advisory Committee to gather and provide information to the Planning Commission. Areas that should be considered in the ordinance, though NOT all inclusive:

- Require sound modeling in the permit application.
- Require conservative downward focused lighting, full cut-off lighting fixtures, with light modeling provided in the permit application. The AUAR opts out of guidelines for downward lighting, which is not acceptable. AUAR p. 74,
- Address water appropriations, i.e., use of City water, separate project well, and/or supplemental project well, and impacts on sustainability of City water supply.
- Address water treatment system and whether City, project, or combo.
- Requirements for vegetation and other visual mitigation.
- Noise modeling to be included in environmental review and application, setbacks from residences and businesses, particularly residences, to comply with state noise standard, and post-construction noise monitoring.

J. REVISE SCHEDULE TO FACILITATE CORRECTED AND SUPPLEMENTED ENVIRONMENTAL REVIEW

The project has set an aggressive schedule that is not feasible. Attachment D, Schedule from Cannon Falls Team Mtg #3; Attachment E, Various Schedules from Data Practices Act Response. Because many areas that must be updated, the information that needs to be included, and providing sufficient notice for public comment on the AUAR redo or the mandated EIS,

⁸ Online at <https://protectpwc.org/wp-content/uploads/2023/02/Lyver-Data-Center-Noise-Study-123122.pdf>

mandated due to data center project proposed and not disclosed in the AUAR or to the public)

Reschedule all steps to provide updating and correction of AUAR or commencement of mandatory Environmental Impact Statement.

+++++

The points above must be addressed in the Final/Revised AUAR prior to its release.

The AUAR is inadequate in so many ways, but most important is the failure of Cannon Falls, the RGU, to provide reasonable notice to the public of the release of the AUAR and the comment period. Cannon Falls released the AUAR on May 20, 2025 per its website, and a public meeting was held then, and no effort was made in meeting announcement PR or at that public meeting to notify the public of this opportunity for comments. Public participation is essential, and notice is a primary step. This is an impact that must be mitigated!!! A do-over of the comment period is needed.

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.

From a review of the AUAR, the paucity of information available on the data center proposed, and the avoidance of disclosure that it is indeed a data center proposed and not “Scenario 1” v. “Scenario 2” or any other scenario, that the AUAR is the wrong environmental review document. This data center project requires an EIS. Some honesty about the plan is needed.

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.

The City of Cannon Falls will have to not only annex land from Randolph Township, but will have to update its zoning ordinance. See, for example, Attachment C, Amendment – Fairfax County, Virginia. Compliance with the amended ordinance will be a large part of mitigation of impacts, through setback, of noise, lighting, and should also address water use and treatment, visual impacts, and structuring of mitigation of socioeconomic impacts through development and

tax or payment in lieu of tax agreements. The draft AUAR, with the addition of the above information at the least, inform the record and guide development of the ordinance, which should then be a part of the final AUAR. In light of the need to determine and establish responsible setbacks, lighting and noise regulation, the Ordinance Amendment should be included in the AUAR.

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.

Thank you for the opportunity to provide this AUAR Comment.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Carol A. Overland".

Carol A. Overland
Attorney at Law

Attachment A - Site Plan



Neil Jensen

From: Bill Angerman <bangerman@whks.com>
Sent: Friday, November 8, 2024 3:37 PM
To: Neil Jensen; 'Laura Qualey'
Cc: pw director; sryan@hoffbarry.com
Subject: RE: Tract Development Utilities

I received updated information from Jed – please see revised below

Neil and Laura – Per our previous discussions, following is a summary of City data and information. Much of this information will be incorporated into Tract's AUAR.

Water Supply and Storage

- Ground water appropriation, the City's authorized volume is 250 MGY. In 2023 the City used 157 MGY.
- Storage Capacity, City has two storage tanks: 500,000 gallon ground storage and 1,000,000 gallon elevated storage
 - o City needs storage equal to average day demand which was 430,000 gpd in 2023.
 - o City has approximately 1.07 MG available before more storage is needed.
- Well capacity, City has three wells with a firm (largest well out of service) capacity of 3.2 MGD.
 - o City needs well capacity equal to peak day demand. Peak day was approximately 930,000 in 2023
 - o City has approximately 2.3 MG available before more well capacity is needed.
- Water quality
 - o See water quality data that was previously provided to Tract. City feeds chlorine (disinfection), fluoride (health), and polyphosphate (iron sequestration)

Water Distribution System

- Pressure and fire flow
 - o City can provide static pressure near the site if requested.
 - o City can perform a fire flow test if requested.
 - o Water modeling of the distribution system may be required depending upon volumes requested.
 - o Tract will most likely need to loop watermain to the site from the south near Highway 20/County Road 29 and from the north at Holiday Ave. This will depend on water volume needed and fire flow requirements.
 - o Tract will need to evaluate if constructing water storage on site is warranted.

Wastewater Treatment

- Plants rated capacities are: AWW (1.09 MGD), MWW (2.18 MGD), PHWW (3.27 MGD)
- Current flows available based on 2022 data, AWW (0.7 MGD), MWW (1.2 MGD), PHWW (no data)
- A treatment plant plan (facilities plan) may be need to be prepared by the City depending upon requested flows.

Wastewater Collection System

- Sewer capacity along Highway 20 will need to be evaluated. Pipe sizes range from 8" to 18". Capacity available will depend upon flow requested. Suggestion is the City perform CCTV of all existing pipe to determine condition now.
- Lift Station capacity. All of the Tract Development land flows to the new lift station at the intersection of Cannon and 3rd. It has an ultimate firm capacity of 2,000 gpm or 2.88 MGD. Current capacity is 900 gpm or 1.3 MGD. This lift station is new so data is not available but assumption is lift station is about 25% utilized currently.

What we will need from Tract.

- Projected water usage. Peak day and average day.
- Projected wastewater discharge in the form of AWW, MWW, PHWW.
- Projected wastewater discharge strength for the following: BOD, TSS, P, Chlorides, Sulfates, Metals, TKN, and potentially others.

Please review and then we should discuss.

Thanks

Bill

William Angerman, P.E. | Executive Vice President, COO
Voice: 507.288.3923 | www.whks.com



ZO 112.1-2024-9
ZO 112.2-2024-8

ADOPTION OF AN AMENDMENT TO CHAPTERS 112.1 and 112.2
(ZONING)
OF THE 1976 CODE OF THE COUNTY OF
FAIRFAX, VIRGINIA

At a regular meeting of the Board of Supervisors of Fairfax County, Virginia, held in the Board Auditorium, Lobby Level, Government Center Building, 12000 Government Center Parkway, Fairfax, Virginia, on Tuesday, September 10, 2024, the Board after having first given notice of its intention so to do, in the manner prescribed by law, adopted an amendment to Chapters 112.1 and 112.2 (Zoning) of the 1976 Code of the County of Fairfax, Virginia, said amendment so adopted being in the words and figures following:

BE IT ORDAINED BY THE BOARD OF SUPERVISORS OF FAIRFAX COUNTY, VIRGINIA:

Amend Chapters 112.1 and 112.2 (Zoning Ordinance), as follows

In Table 4101.1, revise the permissions for Data Center from P to P or SE in I-4, I-5, I-6. In Table 4101.2, remove the permission for a data center in the PRC District, and change the PDC and PTC permissions to SE.

3. Use Table for Residential, Commercial, and Industrial Districts

TABLE 4101.1: Use Table for Residential, Commercial, and Industrial Districts

P = permitted; SE = special exception; SP = special permit; blank cell = not allowed

A = allowed as accessory use only; A+ = permitted as an associated service use; AP = allowed with approval of administrative permit

Use	Residential Districts														Commercial Districts								Industrial Districts						Use-Specific Standards NOTE: General Standards also apply	
	R-A	R-C	R-E	R-1	R-2	R-3	R-4	R-5	R-8	R-12	R-16	R-20	R-30	R-MHP	C-1	C-2	C-3	C-4	C-5	C-6	C-7	C-8	I-1	I-2	I-3	I-4	I-5	I-6		
Industrial Uses																														
Freight Movement, Warehousing, and Wholesale Distribution: uses involving the movement, storage, and distribution of goods. Goods are generally delivered to other firms or the final consumer.																														
Data Center																	P SE	P SE							P SE	P SE	P SE	P SE	P SE	4102.6.A

4. Use Table for Planned Development Districts

TABLE 4101.2: Use Table for Planned Development Districts

✓ = permitted if shown on final development plan/PRC development plan and PRC plan;

✓/SE = permitted if shown on final development plan/PRC development plan and PRC plan, or as special exception if not on plan(s)

SE = special exception; SP = special permit; blank cell = not allowed

A = allowed as accessory use only; A+ = permitted as an associated service use;

AP = allowed with approval of administrative permit

Use	PDH		PRC					PDC		PRM		PTC	PCC		Use-Specific Standards NOTE: General Standards also apply
	Principal	Secondary	Residential	Neighborhood Convenience Center	Village Center	Town Center	Convention/Conference Center	Principal	Secondary	Principal	Secondary		Principal	Secondary	
Industrial Uses															
Freight Movement, Warehousing, and Wholesale Distribution: uses involving the movement, storage, and distribution of goods. Goods are generally delivered to other firms or the final consumer.															
Data Center								SE				SE			4102.6.A

Revise the data center standards in subsection 4102.6.A as shown below.

6. Industrial Uses

Freight Movement, Warehousing, and Wholesale Distribution

A. Data Center

Standards applicable to all data centers:

- (1) To provide visual screening and reduce noise levels, any equipment necessary for cooling, ventilating, or otherwise operating the facility, including power generators or other power supply equipment, must be fully enclosed, except where determined by the Director not to be mechanically feasible based on the manufacturer specifications. If the Director determines it is not mechanically feasible to fully enclose the equipment, it must be screened by a wall or similar barrier. In addition, any equipment as referenced above that is located on the ground and any accessory electrical substation must be screened from view from abutting lots and from rights-of-way by a visually solid wall or a building. This standard does not apply to solar panels.
- (2) In the C-3 and C-4 Districts, the maximum building size is 40,000 square feet of gross floor area. However, this size limit may be exceeded with special exception approval in accordance with subsection 8100.3.
- (3) In the I-2, I-3, and I-4 Districts, the maximum building size is 80,000 square feet of gross floor area. However, this size limit may be exceeded with special exception approval in accordance with subsection 8100.3.
- (4) **Minimum Distance from Residential**
 - (a) Any data center building must be located at least 200 feet from the lot line of an R district or a property developed with a residential use.
 - (b) If located on the ground, any equipment for cooling, ventilating, or otherwise operating the facility, including any power generator or other power supply equipment, must be either:
 1. Located at least 300 feet from the lot line of an R district or a property developed with a residential use; or
 2. Separated from the lot line of an R district or a property developed with a residential use by the principal data center building.
 - (c) Lesser distances may be allowed with special exception approval in accordance with subsection 8100.3.
 - (d) For the purpose of this provision, an R district does not include an area within a public street right-of-way.
- (5) A data center building must be located at least one mile from a Metro station entrance. A lesser distance may be allowed with special exception approval in accordance with subsection 8100.3.
- (6) Prior to site plan approval, a noise study must be submitted demonstrating to the Zoning Administrator's satisfaction that the operation of the data center will comply with the Noise Ordinance, Chapter 108.1 of the County Code. In addition, prior to issuance of a

Nonresidential Use Permit, a post-construction noise study must be submitted demonstrating to the Zoning Administrator's satisfaction that the operation complies with the Noise Ordinance.

Standards when permitted by right:

- (7)** A data center building must include a main entrance feature that is differentiated from the remainder of the building façade by a change in building material, pattern, texture, color, or accent material. The entrance feature must also either project or recess from the adjoining building plane.
- (8)** All building façades must include:
 - (a)** A change in the façade surface for every 150 horizontal feet of at least one of the following: building material, pattern, texture, color, or accent material; and
 - (b)** Windows, doors, or similar fenestration design features such as faux windows, must be distributed horizontally and vertically across the façade and comprise a minimum of 30 percent of the individual façade.

Standards when permitted by development plan or special exception:

- (9)** A data center building must be designed to minimize adverse visual impacts on surrounding development as demonstrated by the submission of elevations, architectural sketches, or sight line studies. The building should have a high-quality design as evidenced by the use of materials, color, and texture. If the building is located less than 200 feet from an R district or a property developed with a residential use, it should include changes in building height or other design techniques to provide variation in building mass as viewed from the nearby residential district.

Add rezoning and special exception submission requirements for a data center. Renumber as needed.

8101. Submission Requirements

2. Zoning Map Amendments (Rezoning)

E. Supporting Reports and Studies

The following additional information must be submitted:

(12) Data Center

For a rezoning to allow a data center, the application requires the following additional information:

- (a)** A noise study demonstrating that the operation of the data center will comply with the Noise Ordinance, Chapter 108.1 of the County Code.
- (b)** Architectural depictions of the proposed building and associated equipment as viewed from all lot lines and street lines.

3. Special Exceptions, Special Permits, and Variances

D. Additional or Modified Submission Requirements for Specific Special Exception Applications

The following are additional or modified submission requirements for special exception applications for:

(8) Data Center

- (a) A noise study demonstrating that the operation of the data center will comply with the Noise Ordinance, Chapter 108.1 of the County Code.
- (b) Architectural depictions of the proposed building and associated equipment as viewed from all lot lines and street lines.

Add provisions for the Data Centers Zoning Ordinance Amendment to subsection 2.B of Appendix 1, Provisions Relating to Previous Approvals.

Data Centers

- (a) Any site plan for a data center accepted for review on or before July 16, 2024, will be reviewed based on the provisions of the Zoning Ordinance in effect on July 16, 2024, if:

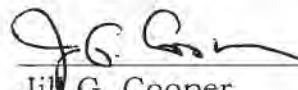
- 1. The site plan is approved by July 16, 2025;
- 2. The approval remains valid; and
- 3. The uses, features, and structures are established or constructed in accordance with approved plans and permits.

An approved plan may be revised notwithstanding this amendment if it does not aggravate conflicts with the amendment. Building permits and other related subsequent plan and permit submissions may be accepted and new approvals may be granted, consistent with the approved site plan. The applicant/owner may elect to have the above applications reviewed in their entirety under the provisions of this amendment.

- (b) For all applications for rezonings and related development plans, special exceptions, site plans, or building permits that include a data center approved on or before July 16, 2024, the applicant/owner may continue under their previous approval. Subsequent plan and permit submissions may be accepted and new approvals may be granted, consistent with those prior approvals. Revisions to such prior approvals may be approved if they do not aggravate conflicts with this amendment.

These amendments shall become effective on September 11, 2024, at 12:01 a.m.

GIVEN under my hand this 10th day of September, 2024.



Jill G. Cooper
Clerk for the Board of Supervisors

Timeline		Council/B								
	AUAR	Start Date	Finish	oard Vote	April	May	June	July	August	Sept
Adopt Final Order		4/15/2025	4/15/2025	Y						
City Staff AUAR Draft Review		4/16/2025	4/25/2025	N						
Tract Community Meeting		4/29/2025	4/29/2025	N						
30 Day Public Comment Period		5/27/2025	6/26/2025	N						
City Adopts Final AUAR		4/15/2025	8/19/2025	Y						
Annexation/Plat/Development Agreement										
Water and Wastewater Studies		4/1/2025	5/27/2025	N						
City Admin shares Council Update on the decision making process and timeline		5/6/2025	5/6/2025	N						
Joint Council Planning Comm. Work session to discuss decision making process		5/20/2025	5/20/2025	N						
Annexation application received - 60 day deadline possible 60 day extension		5/27/2025	7/26/2025	N						
Township Annexation agreement discussions		6/2/2025	6/13/2025	N						
Plat/Subdivision Application - need 120 days		6/6/2025	10/4/2025	N						
Council Work Session to discuss annexation, plat, development agreement		6/17/2025	6/17/2025	N						
Staff review, take stakeholder input		6/18/2025	7/9/2025	N						
Planning Commission Plat, PUD, Development Agreement - Public Hearings		7/14/2025	7/14/2025	N						
Annexation Resolution Approval - Council		7/15/2025	7/15/2025	Y						
Submit Annexation to Cannon <i>Dakota</i> County		7/16/2025	9/2/2025	N						
Council Public Hearings		8/5/2025	8/5/2025	N						
Final Joint Work Session on Plat, PUD Development Agreement		8/19/2025	8/19/2025	N						
Final Planning Commission Approval		9/8/2025	9/8/2025	Y						
Final City Council Approval		9/15/2025	9/15/2025	Y						

City Coordination Task	Start Date	Finish Date	2025	Jan	Feb	March	April	May	June	July	August	Sept
City/PLUHA Negotiation with Township for R331 Authority	11/19/2024	1/21/2025										
City Council Approval on AUAR RGU	1/21/2025	2/10/2025										
City/PLUHA Draft AUAR Order & Scoping EAW	1/14/2025	2/10/2025										
City/PLUHA Final Draft AUAR Order & Scoping EAW	1/17/2025	2/19/2025										
City/PLUHA Final Order & Scoping EAW	4/8/2025	4/15/2025										
City Council Adopts Final Order	4/15/2025											
City Reviews Draft AUAR	4/7/2025	4/25/2025										
PLUHA Revises Draft AUAR Based on City Comments	4/28/2025	5/2/2025										
City Reviews Draft AUAR	5/5/2025	5/12/2025										
30-Day Public Comment Period	5/27/2025	6/26/2025										
City/PLUHA Review of Final AUAR	7/4/2025	7/14/2025										
10-Business Day Final AUAR Objection Period	7/29/2025	8/12/2025										
City Adopts Final AUAR at City Council	8/19/2025											
City Submits Notice of Adoption of Final AUAR to EQB	8/26/2025											
City Admins Solicitor Simon City Property (Submitted by Seller)	4/15/2025	5/15/2025										
Amendment	7/14/25											
Draft Joint Resolution	4/9/2025	6/9/2025										
City Planning Commission	7/14/2025											
City Council on Joint Resolution	9/19/2025											
City Pre-equivalent Meeting	3/4/2025											
Development Stage City Submittal (Prelim PUD, Prelim Plan, DUP)												
PLUHA Prepares City Development Stage Submittal	3/20/2025	5/15/2025										
Development Stage City Review	5/27/2025	6/23/2025										
Development Stage Planning Commission	7/14/2025											
Development Stage City Council	8/18/2025											
Final Plan Submittal (Final PUD, Final Plat, Development Agreement)												
PLUHA Prepares City Final Plan Submittal	8/4/2025	8/19/2025										
Final Plan City Review	8/19/2025	8/26/2025										
Final Plan Planning Commission	9/8/2025											
Final Plan City Council	9/16/2025											

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CANNON FALLS INDUSTRIAL SCHEDULE					4/1/2028				
City Coordination Task		Start Date	Finish Date	April	May	June	July	August	Sept.
AUAR									
City Council Adopts Final Order		4/15/2025							
Township Reviews Draft AUAR		4/4/2025	4/24/2025						
30-Day Public Comment Period		5/27/2025	6/26/2025						
City Adopts Final AUAR at City Council		8/19/2025							
Subdivisions									
McGow Township Subdivision - Planning Commission		4/1/2025							
McGow Township Subdivision - Township Board		4/15/2025							
Simon Township Subdivision - Planning Commission		5/6/2025							
Simon Township Subdivision - Township Board		5/20/2025							
Annexation									
Draft Joint Resolution		4/8/2025	6/5/2025						
Submit Annexation Application to Township		6/6/2025	5/21/25						
Township Planning Commission		7/1/2025							
City Planning Commission		7/14/2025							
Township Board		7/15/2025							
City Council		8/19/2025							

Red Items = Randolph Township Actions

 **DRAFT**

City Coordination Task	2025											
	Jan	Feb	March	April	May	June	July	August	Sept	Oct	Nov	Dec
City Council & Township Approval on AUAR/EGU	✓											
City Review Draft AUAR Order & Scoping EAW												
City Reviews Draft AUAR Order & Scoping EAW												
City Reviews Final AUAR Order & Scoping EAW												
City Council Adopts Final Order												
City Reviews Draft AUAR												
City Reviews Draft AUAR												
30-Day Public Comment Period												
City/Client Review of Final AUAR												
10-Business Day Final AUAR Objection Period												
City Adopts Final AUAR at City Council												
City Submits Notice of Adoption of Final AUAR to EQB												
City Admin Lot Split for Simon City Property												
Annexation												
Draft Joint Resolution												
City Council on Joint Resolution												
City Plat/PUD/Rezoning/DA & CUP												
City Pre-application Meeting												
Development Stage City Submittal (Prelim PUD, Prelim Plat, CUP)												
City Plat/PUD/Rezoning/DA & CUP												
City Pre-application Meeting												
Development Stage City Review												
Development Stage City Council												
Final Plan Submittal (Final PUD, Final Plat, Development Agreement)												
City Prepare City Final Plan Submittal												
Final Plan City Review												
Final Plan Planning Commission												
Final Plan City Council												

*** = Contingent City Council Approvals

DRAFT

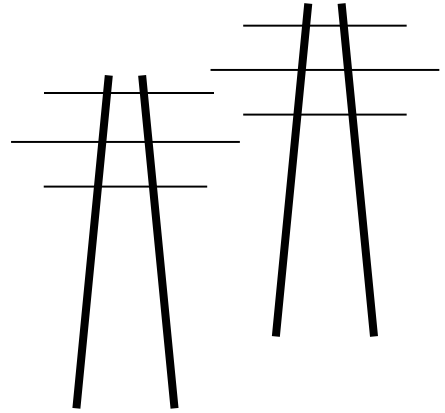
Attachment E - Various schedules from Data Practices Act Response

[illegible]

Legalelectric, Inc.

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June 27, 2025

John Radermacher
City Administrator
918 River Road
Cannon Falls, MN 55009

via email: cityadmin@cannonfallsmn.gov

RE: Late-filed Supplemental Comment on Draft AUAR – TRACT Data Center

Dear Mr. Radermacher:

I forgot to add a simple but obvious error.

It's Oxides of Nitrogen (NO_x) and NOT Nitrous Oxide (N₂O). See AUAR p. 62, and Appendix at 307 of 335.

HA HA HA HA HA HA HA... oh... it's not a laughing matter if consultants and project proponents don't know the difference.

Very truly yours,

Carol A. Overland
Attorney at Law