

Appendix J:
Draft AUAR
Comment
Responses

OVERVIEW

The Updated Hermantown Industrial Draft Alternative Urban Areawide Review (AUAR) was prepared and published for public comment in accordance with the Minnesota Rules, part 4410.3610, subpart 5. The Draft AUAR was published for the 30-day comment period on June 16, 2026, and distributed to the Environmental Quality Board (EQB) and persons and agencies on the official EQB distribution list in accordance with EQB rules. Comments were accepted through July 16, 2026.

The Responsible Governmental Unit (RGU) must consider all timely and substantive comments in accordance with Minnesota Rules, part 4410.3610, subpart 5.B. Four comment letters were received from agencies, and 192 comment letters were received from the public. Responses to the agency comments are included in Table 1, responses to the themes of the public comments are included in Table 2, and copies of the comment letters are included in Appendix K.

CHANGES MADE TO THE FINAL AUAR

The following changes were applied to the Final AUAR based on the Draft AUAR comment period from submitted comment letters:

AUAR Item No. and Topic	Updates to the Final AUAR	Requested by
Item 6. Project Description	Further explanation of anticipated construction duration, noise and traffic, and timing of activities for each phase of the project.	Agency Comments (Minnesota Pollution Control Agency, Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
Item 9. Permits and Approvals	Added potential permitting needs for stream or wetland crossings associated with utility extensions, if needed in the future, based on final design.	Agency Comments (Minnesota Pollution Control Agency)
Item 12. Water Resources	Further explanation of potential wetland impacts from utility extensions.	Agency Comments (Minnesota Pollution Control Agency)
	Further explanation of how the Closed Loop Cooling System would operate and the additives that could be used for the closed-loop system. Clarified that a dry cooled and air cooled are both closed-loop systems that were presented in the Draft AUAR. Additionally,	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE, and 1854 Treaty Authority) Public Comments

AUAR Item No. and Topic	Updates to the Final AUAR	Requested by
	Figure 19: Closed Loop Cooling System Graphic was added.	
Item 13. Contamination/Hazardous Materials/Wastes	Section was updated to include results from the Phase II Environmental Site Assessment that was completed during the Draft AUAR. Additional information was provided on data center e-waste management and backup generation fuel quantity estimates.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE, and 1854 Treaty Authority) Public Comments
Item 14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	Section was revised to include Bald and Golden Eagles and an explanation of the Bald and Golden Eagle Protection Act (BGEPA).	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE)
	Section was updated with an updated IPaC letter. Tree clearing restriction dates were updated in the AUAR based on MDNR recommendations of avoiding tree clearing during northern long-eared bat pup season from June 1 to August 15.	The previous IPaC letter was past the 90 day limit. NLEB is not listed on the IPaC therefore federal tree clearing restrictions do not apply.
Item 15. Historic Properties	More information on the 1854 Ceded Treaty of LaPointe's covered territory.	Agency Comments (1854 Treaty Authority, Fond du Lac Band of Lake Superior Chippewa and CURE)
Item 16. Visual	Visualizations of the project were added into this section to show how mitigation would be applied.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
Item 17. Air	Added an Air Quality Analysis that describes type, sources, and compositions of possible emissions from stationary sources.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE, 1854 Treaty Authority) Public Comments
	Further explanation on the fuel quantity and storage requirements related to quantity of emergency generator in project.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments

AUAR Item No. and Topic	Updates to the Final AUAR	Requested by
	Further explanation of "fugitive dust" from construction activities and added commitment of the Project Proposer to create a Fugitive Dust Control Plan prior to construction.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
Item 18. Greenhouse Gas Emissions/Carbon Footprint	Additional context provided about utility specific emission factors used by the EQB's Greenhouse Gas calculator, calculation of first-year missions, and how and why emissions change over time.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE, and 1854 Treaty Authority) Public Comments
Item 19. Noise	Reference to Item 6. Project Description on what expectations are for noise during construction and more explanation was included on infrasound.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
Item 21. Cumulative Potential Effects	Additional Minnesota Power projects were added and evaluated in this section.	Public Comments
Item 22. Other Potential Environmental Effects	Further explanation of the potential electro-magnetic radiation from the project and the associated transmission lines and further explanation on urban heat island effects.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
Mitigation Plan	In the Mitigation table, a reference to City Ordinances to minimize blue light, uplight, and backlight was added.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
	In the Mitigation table, further explanation of the potential permits and approvals for stream and wetland impacts from utility extensions were added.	Agency Comments (Minnesota Pollution Control Agency)

AUAR Item No. and Topic	Updates to the Final AUAR	Requested by
	In the Mitigation table, explanation that environmental protection measures specific to stormwater management must be maintained for the life of the project and environmental protection measures will be required for future development within the AUAR area.	Agency Comments (Minnesota Pollution Control Agency) Public Comments
	In the Mitigation table, a new commitment related to operational waste was added.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
	In the Mitigation table, a new section was added to implement a complaint response plan during construction.	Agency Comments (Fond du Lac Band of Lake Superior Chippewa and CURE) Public Comments
	In the Mitigation table, a new column was added to include the agency responsible for reviewing and enforcing the applicable mitigation item.	Public Comments

AGENCY COMMENTS

Table 1. Government Agency Comments and Responses

Comment	Response
1. Minnesota Pollution Control Agency	
Item 6, Project Description In previous comments on this project proposal (Hermantown Industrial AUAR), the MPCA requested that additional information be included in future versions of the AUAR that describe alternative locations that were evaluated and the reasoning why those other sites were not chosen for this project proposal. Also requested was information on alternative configurations and project scale. The request for including this information is supported by Minnesota	This Study Area was selected as a priority over other project sites in the area that were explored, due to its proximity to existing power infrastructure with the Arrowhead Substation, cohesive land within the city with availability to extend municipal water/sewer infrastructure to the site, the ability to minimize wetland and tree impacts compared to other sites, depth to bedrock, and close access to existing

Comment	Response
Rules, chapter 4410.3610, subpart 5. The Updated Draft AUAR only includes very general information on alternative sites and simply describes the attributes of the Hermantown location. As previously stated, the proposed location is surrounded by numerous sensitive water resources. Land alterations and high-density development near these resources will increase the risk for degradation. Trout streams near the proposed development are examples of sensitive waters that have been degraded and impaired by development in those watersheds. A detailed alternatives analysis (sites, configurations, and scale) would demonstrate that in addition to other factors desired or needed for the proposed development, that the environmental conditions and constraints of those alternative sites were also factored into decision making. This would also demonstrate that due diligence by the project proposer in selecting this location after consideration of alternative sites.	County/State highways for ease of construction and operational access. In sum, these attributes minimized environmental conditions and constraints. Minnesota Rules Section 4410.3610, subp. 5a(C) provide that commenters may suggest additional development scenarios that include alternatives to the specific large project or projects proposed to be included in the review, including development at sites outside of the proposed geographic boundary, if comments “provide reasons why a suggested development scenario or alternative to a specific project is potentially environmentally superior to those identified in the RGU's draft order.” EQB's AUAR guidance states the same requirement. Comments under subp. 5.B may address the need to analyze additional development scenarios as required by Subpart 5; the scenarios required here are those established through the order for review. The City applies the criteria found under the EIS alternatives analysis, Minn R. 4410.2300, item G, in determining whether a suggested scenario or alternative should be included or excluded and explains its reasoning in a written record of decision. The EQB’s Guide to Minnesota Environmental Review Rules (May 2010) (EQB Guidance) provides that a Responsible Governmental Unit (RGU) need not consider a proposed alternative if: - o The underlying need for or purpose of the project is not met. - o A significant environmental benefit over the proposed project is not provided; or

Comment	Response
	o Another alternative is likely to be similar in environmental benefits but will have less socioeconomic impact. MPCA has not proposed alternative sites or otherwise presented alternatives during this process, and has not otherwise provided reasons why an alternative to the project as studied in the AUAR would be potentially environmentally superior to the site identified in the City's draft order. Other commenters proposed alternative sites that did not meet the underlying need or purpose of the project, which is a proposed data center campus in the City of Hermantown. Other commenters also proposed alternative technologies, and discussion of alternative technologies has been incorporated in the AUAR to the greatest extent practicable, consistent with known design details. A response to other comments on alternatives was included in the response to scoping comments, and is included below in the Public Comment response table under the category "Comments Proposing Alternatives." The AUAR's discussion of site selection & consideration of alternative sites is more than the applicable rules require.
How will the project site be developed? Related to site clearing and grading, the AUAR states "Preliminary construction work (i.e., tree clearing) is anticipated to begin as early as 2027 followed by mass grading activities ..." Related, Item 11b, states "The proposed project would require up to approximately 2.3 million cubic yards of excavation over 184 acres." Regarding construction, the AUAR states "The campus would be constructed in distinct sequential phases, with the full master-planned campus anticipated to take more than 5 years to complete." Please clarify the timing and extent of site clearing, grading and excavation of the property, and whether these activities will be done at one time over the 184 acres, or if these activities will be more closely tied to the construction phases. We have concerns that disturbing the	The proposed campus is anticipated to be constructed over a period exceeding five years. While vertical building construction would occur in sequential phases with staggered start and completion dates, site preparation activities—including tree clearing, mass grading, excavation, installation of primary stormwater infrastructure, and major utility backbone improvements—are currently anticipated to occur as a coordinated effort early in the overall construction schedule. More explanation on timing of activities and duration have been added to the Final AUAR in Item 6 Project Description.

Comment	Response
vegetation and soils over a large area that may then sit idle for several years may be problematic in maintaining erosion and sediment controls, temporary sediment basins, and could result in sediment being deposited into site wetlands, nearby trout streams, and off site. This concern is heightened by the project setting among trout stream watersheds and wetlands.	The AUAR conservatively estimates that approximately 2.3 million cubic yards of earthwork would be required to prepare the approximately 184 acres for full build-out. Completing the majority of site grading at the outset provides the approximate finished site grades, drainage patterns, and utility infrastructure needed to support phased building construction over time. Types of earthwork equipment used would be scrapers, bulldozers, excavators, and motor graders. As individual building phases progress, portions of the site that are not under active construction would not sit bare. These areas would be temporarily stabilized in accordance with the project's Construction Stormwater Permit, Stormwater Pollution Prevention Plan (SWPPP), and applicable erosion and sediment control requirements to not impact adjacent wetlands or trout streams. Temporary stabilization measures may include seeding, mulch, erosion control blanket, hydraulic mulch, or other approved BMPs until those areas are needed for subsequent construction phases. Permanent stabilization and landscaping would be completed as individual portions of the campus are finished.
Item 8, Cover Types Table 5 indicates that that the project will remove up to 10,538 of the estimated 10,783 existing trees on the property (approximately 98% of trees proposed to be removed), with 245 replacement trees to be planted. Does the City of Hermantown have requirements for tree preservation and replacement relating to development? If so, does the proposed tree replacement comply with requirements, such as mitigation for tree loss? The project is converting the project area from largely forested and containing a diverse mix of trees, shrubs, and woody vegetation, and replacing it with a large open area that is	The AUAR acknowledges that implementation of the maximum development scenario would result in the removal of a substantial portion of the existing tree cover within the Study Area. The AUAR evaluates the maximum development scenario for proposed tree and other resource impacts, and applicable mitigation that would be required. The project proposer's intent is to minimize tree impacts to the extent practicable through further site design refinement.

Comment	Response
largely a developed land cover. Forested areas have a greater value than the trees alone, providing a broad range of environmental services to the area and supporting a great diversity of plant and animal species in an interconnected ecosystem. Please explain how the AUAR will mitigate for the loss of forested areas or the environmental services they provide.	The City of Hermantown does not have a tree preservation, tree replacement, or tree mitigation ordinance that establishes specific requirements for preserving existing trees or replacing trees removed during development, but the City may impose tree-related conditions in future approvals. Tree preservation requirements are municipal land use policy under MN R. 462, not MN R. 4410. The Project Proposer must adhere to a related requirement that prescribes screening/buffering. While the proposed development cannot fully replace the ecological functions associated with existing forested areas, several measures are incorporated into the development framework to reduce environmental effects such as preservation of wetlands, implementation of stormwater best management practices designed to meet applicable regulatory standards, incorporation of green infrastructure elements where feasible, and installation of new landscaping and replacement trees throughout developed portions of the site. These measures are intended to maintain water quality functions, reduce runoff, provide some replacement vegetation, and support site aesthetics.
Item 10, Land Use Regarding St. Louis River Comprehensive Water Management Plan, the project will result in environmental impacts in which mitigation is being proposed to minimize those impacts. The project doesn't solve existing environmental problems or provide further protections or enhancements of the existing water resources.	MEPA and MN R. 4410 require identification of the project's potentially significant impacts and a mitigation plan addressing them but do not require remediation of pre-existing impairments or net environmental improvement. The St. Louis River Comprehensive Water Management Plan identifies Hermantown as a Targeted Community for the implementation of low impact development techniques, including stormwater BMPs that help groundwater recharge and slow the flow of stormwater runoff. City of

Comment	Response
	Hermantown stormwater design limits the rate of discharge into wetlands. The proposed stormwater management systems are specifically designed to preserve the existing hydrologic regime and the rate of discharge will be controlled, limiting peak stages and outflow rates. This will help achieve the long term goal of the 1W1P Plan of well managed developed land.
Item 12, Water Resources The proposed permanent stormwater treatment from impervious surfaces includes storm sewers and stormwater basins that would then discharge to the wetland in the southeast portion of the property (wetland W-1 in Figure 14) and to Unnamed Creek 685 (Midway River tributary). One concern regarding this concept is that the water discharge to the wetland may degrade existing wetland conditions. Please explain how the increased discharge of stormwater to wetland W-1 will not alter the existing (pre-development) hydrologic regime. The proposed development also has the potential to change the dynamics of water distribution of this area (e.g., runoff, infiltration, storage, groundwater recharge) and may have effects beyond the AUAR area, including Rocky Run Creek to the west, "Adolph Creek" to the northeast, other tributary streams, groundwater springs, and wetlands.	The proposed stormwater management system is specifically designed to preserve the existing hydrologic regime of nearby wetlands through controlled release rates and peak water level management. City of Hermantown stormwater design limits the rate of discharge into wetlands. While overall volume of discharge into W-1 will increase, the rate of discharge into the wetland will be controlled. W-1 is considered a Moderately Susceptible Wetland Type (as defined by the Minnesota Stormwater Manual) as the wetland was largely delineated as a Type 6/Alder Thicket wetland. The manual states that the inundation period for 1-and-2-year precipitation events for susceptible wetlands should remain as "existing plus 1 day." Based on modeling of a 2-year flood event, the wetland meets this hydroperiod standard. The post-development High Water Levels (HWLs) within Wetland W-1 are not expected to exceed pre-development peak water surface elevations in the design storm events. By limiting peak stages and outflow rates, the wetland would not experience unnatural inundation depths that could alter vegetation zones or degrade habitat. Since there is rate attenuation within the onsite ponds, the wetland inundation period is anticipated to increase but be limited to existing conditions plus 1 day for the 2-year event and

Comment	Response
	existing conditions plus 7-days for the 10-year event within the recommended hydroperiods for these wetlands based on the Minnesota stormwater manual. Additionally, as described in Section 12, the Project Proposer will develop a conceptual site model as part of a phased evaluation of groundwater-surface water interactions and associated thermal considerations. This evaluation will incorporate existing publicly available information, including the Midway River Watershed Protection Study, as well as data collected from onsite piezometers. The results will be used to improve understanding of groundwater recharge conditions and groundwater flux estimates, inform Project design and operations, and support the identification and implementation of mitigation measures, where warranted.
Regarding public utility extensions, the AUAR states "Wastewater conveyance infrastructure (lift stations, force main, and gravity sewer) is to be installed ..." Also, "With the proposed public watermain improvements, additional water supply infrastructure would be needed to ensure adequate volume and pressure to serve the study area." Because the utilities are a necessary component to the project, this associated infrastructure and any potential or actual environmental impacts need to be discussed in the AUAR (e.g., stream crossings, temporary and permanent wetland impacts). Based on our reading of the AUAR, we believe that information in impacts from utility extensions is not included in the document. Please provide additional description of this infrastructure, including the associated environmental effects of constructing these services. If this information is not reflected in Section/Item 8, please update that information to the text and Table 3.	Public utilities are evaluated and discussed in Items 6, 9, 10, 12, and 21 in the AUAR. A figure showing a map of the approximate location of the utility extension, which is subject to change as designs advance, is shown as Figure 20. The design of these public utility extensions are not complete to be able to assess if any stream crossings or temporary or permanent wetland impacts are proposed; however, the City will comply with any wetland permitting requirements for this work, if needed in the future, and this has been added to the Final AUAR in item 9 Permits and Approvals. In addition, a section titled "Public Utility Extension Aquatic Resource Review" has been added to the Final AUAR, and includes additional discussion of the types of components necessary for a utility extension, including methods of construction and potential impacts based on construction method.

Comment	Response
	The utility extension corridor falls outside of the geographic area designated under MN R. 4410.3610, subp 3. The City will screen the utility extensions independently against the mandatory categories of MN R. 4410.4300 prior to approval.
Past MPCA comments on the AUAR included discussion on Adolf Creek, and unnamed creek located north and east of the project area. Adolf Creek was included in MPCA's Midway River Watershed Protection Study (MPCA, August 2025) as an unmapped stream and a Coldwater tributary to Midway River. The MPCA and partners conducted the needed data collection to establish a designated trout stream listing and be added to Minnesota's protected waters inventory. This information was submitted to the Minnesota Department of Natural Resources to complete the designation, which is under their agency authority. The water quality data collected on Adolph Creek will be included in MPCA's next assessment cycle and will be evaluated against Coldwater metrics.	Comment acknowledged and noted. The Midway River Watershed Protection Study is discussed in the Final AUAR. Further, as discussed in the Final AUAR, the Project Proposer will complete a phased evaluation of groundwater–surface water interaction and related thermal, quantity, and quality considerations within the Study Area and surrounding area. The Project Proposer has consulted with MPCA on the work plans for this study. Based on consultation, the Project Proposer understands that this study would surpass the standard protocols for evaluating impacts on trout streams. Consistent with the Mitigation Plan condition that requires, the Project Proposer to “coordinate with the MPCA and MDNR to ensure compliance with anti-degradation policies and trout stream protections,” the Project Proposer remains committed to ongoing consultation with MPCA regarding mitigation to avoid trout stream impacts as project designs develop.
Item 21, Cumulative Potential Effects As stated in MPCA comments to Item12, the proposed utility extensions are a connected action to the project proposal and the environmental effects that may or will result from constructing these utilities needs to be included in the AUAR. The AUAR guidance under Item 12., Water Resources, states "The information called for on the EAW form should be supplied for any of the infrastructure associated with the AUAR development, and for any development expected to physically impact any water resources." The utilities are a necessary component for the project to operate, and the project	The explicit municipal purpose of the proposed utility extensions is to support development generally within the area identified for municipal service in the City's adopted 2045 Comprehensive Plan. The expansion of the Urban Services Boundary, and the associated provision of urban services, was on an independent planning trajectory from the proposed Project and was not directly induced by the project. A project that is a prerequisite for another is a connected action only where the prerequisite project is not justified by itself. While the utility extension is a

Comment	Response
developer is paying for the installation of public utility improvements. This information should be added to the AUAR and be written at an adequate level of detail for the readers to understand actual and potential impacts. This rural area of Hermantown is fortunate to include numerous wetlands, trout streams, springs and undeveloped natural areas. The extension of utilities will undoubtedly have environmental impacts, along with impacts from other necessary, related infrastructure that are components of these utilities (e.g., lift stations, access points, water storage, etc.). A cursory review of the proposed routes for utility extensions will require numerous stream crossings and encountering wetlands. Again, this information needs to be added to the AUAR.	prerequisite for the data center, the utility extension is justified by itself. Therefore, the utility extensions do not meet the definition of connected action Under Minn. R. 4410.0200, subp. 9c. Though the Project Proposer is one funding source for an already-contemplated project, with the potential for multiple beneficiaries of the resulting infrastructure. Public infrastructure routinely gets built with funding sources that are themselves dependent on private development (e.g. trunk-oversizing agreements, park dedication fees, etc.), but funding relationships do not themselves convert the public infrastructure into a connected action. A description of potential wetland impacts, wetland delineation, and permits that could be needed for the utility extensions have been added to Item 12, Water Resources; Item 9, Permits and Approvals; and the Mitigation Plan table.
Along with recent changes related to the City of Hermantown 2045 Comprehensive Plan, constructing centralized drinking water and wastewater utilities to this area will increase the ability for development of this rural area, including the type of development, the potential for increased intensity of land use, and the speed at which development occurs. A recent economic study of Adolph includes interest in future development (City of Hermantown Adolph Development Economic Impact Analysis, University of Minnesota Duluth, 2026-03, https://hdl.handle.net/11299/279729). Directly tied to development will be permanent alterations to the landscape and will include additional encroachments on area streams (mostly trout streams), and to wetlands. While each individual project may have minimal impacts, the cumulative result may diminish the diversity and quality of existing environmental conditions. Given the impaired water quality conditions of	Any future development that might connect to the utility extension is outside of the scope of this AUAR, but could be subject to its own permitting process to evaluate cumulative potential effects when that project is planned, permitted, and scheduled or when a sufficient basis of expectation has been laid. Cumulative potential effects include the "effect on the environment that results from the incremental effects of a project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned or for which a basis of expectation has been laid." Minn. R. 4410.0200, subp. 11a. "In determining if a basis of expectation has been

Comment	Response
streams within Hermantown and surrounding communities, current zoning controls may not be effective at protecting water resources from impacts related to development and urbanization and additional impairments may result.	laid for a project, an RGU must determine whether a project is reasonably likely to occur and, if so, whether sufficiently detailed information is available about the project to contribute to the understanding of cumulative potential effects." <i>Id.</i> The UMD document is an economic impact analysis that identifies no specific project, location, or timing, and therefore is unable to establish a basis of expectation. Any future plans lack sufficiently detailed information about the project to contribute to the understanding of cumulative potential effects because there is no indication of what those additional projects might include or when development might occur. The adequacy of municipal official controls related to zoning is governed by MN. R 462 and the Comprehensive Plan process and is outside MN R. 4410 review.
Draft Mitigation Plan The mitigation plan is not adequate in detail or in action to mitigate for environmental impacts related to the development. Most of the mitigation or commitment actions focus on the construction phase of the project. However, the need to demonstrate that mitigation is being achieved is ongoing, for the life of the project. While the development impacts will be immediate and permanent (e.g., loss of forested areas, increased impervious surfaces, wetland impacts), any environmental effects from these changes may not be immediately apparent. The mitigation plan needs to include ongoing measures to verify that adequate mitigation actions have been included that are adequate to minimize negative effects. The built infrastructure will need to be maintained to ensure that it is operating correctly and effectively. The plan needs to consider such things as the future conditions of on-site wetlands and nearby resources outside of the AUAR boundary (wetlands, streams, and springs) to ensure that these resources are not being impacted or otherwise degraded over time by the project or from inadequate mitigation.	In addition to mitigation measures for construction phase activities, the AUAR mitigation plan includes environmental protection measures that will remain effective throughout project operation and maintenance. For example, long-term performance of stormwater management facilities, wetland buffers, and other environmental protection features must be maintained as provided in the mitigation plan, and will be included through applicable permit requirements, city approvals, and operation and maintenance obligations. These requirements are intended to ensure that stormwater infrastructure continues to function as designed and that runoff rates, volumes, and water quality standards remain consistent with approved plans and regulatory requirements. This requirement has also been added to the AUAR Mitigation Plan as a new commitment:

Comment	Response
	Stormwater management facilities, wetlands, buffers, and other environmental protection measures must be maintained for the life of the project in accordance with applicable permit requirements, approved operations and maintenance plans, and local stormwater management regulations. Future development within the AUAR area must be subject to project-specific permitting to verify that stormwater management systems, wetland protection measures, and other mitigation features are functioning as intended and continue to protect on-site and downstream resources. Where required by permitting agencies, monitoring, inspection, maintenance, and corrective actions must be implemented to address any identified deficiencies and to maintain long-term environmental performance.
2. Minnesota State Historic Preservation Office	
Based on a review of the report Phase I Archaeological Survey for Project Loon-Hermantown, St. Louis County, Minnesota (January 15, 2026) as prepared by In Situ Archaeological Consulting, we agree that archaeological site 21SL1302 is not eligible for listing in the National Register of Historic Places and that the proposed project will not affect significant archaeological sites. Based on the information provided, we have determined that there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by the proposed project.	Thank you for your review. Comment noted and Item 15 in the Final AUAR has been updated to include MnSHPO's concurrence.
3. Fond du Lac Band of Lake Superior Chippewa and CURE	
The Project must be reviewed with an Environmental Impact Statement As previously stated in Commenters' Scoping Comments, using an AUAR process, instead of an Environmental Impacts Statement (EIS), for the Project	The City of Hermantown and the project proposer are voluntarily preparing an updated AUAR to provide the public with additional opportunities to comment on newly

Comment	Response
is both detrimental to public engagement and transparency and contrary to state law. It is beyond any question that the proposed Project poses the “potential for significant environmental effects.”⁴ And while an AUAR for a specific project can be used in lieu of an Environmental Assessment Worksheet (EAW) or EIS in certain circumstances, a Responsible Governmental Unit (RGU) can also opt for a more robust form of environmental review. That is what Hermantown, or another more expert RGU, must do in this instance. To comply with MEPA, the environmental review of the Project must include the consideration of a no action alternative, along with other foreseeable alternatives identified below.	available project details on a reduced Study Area and to provide the city of Hermantown with additional analysis about environmental impacts from the proposed Project. An AUAR is an appropriate process for environmental review because under Minn. R. 4410.3610, subp. 1: “A local unit of government may use the procedures of this part . . . to review anticipated . . . light industrial development and associated infrastructure in a particular geographic area within its jurisdiction . . .” The proposed development scenario meets the State’s mandatory requirements for an environmental review process based on Minnesota Rules 4410.4400. Minnesota Rule 4410.3610 allows for an alternative form of review through an AUAR for qualifying projects, including this scenario. Like an environmental impact statement, this AUAR includes cumulative potential effects review as well as a mitigation plan that must be followed. An AUAR is a study document which provides an evaluation of the environmental impacts of future development, and the opportunity to manage and mitigate those impacts. The information and comments from an AUAR process assist communities as they contemplate local planning and zoning decisions. To ensure compliance and accuracy, future development like this project must align with the AUAR's assumptions; otherwise, the AUAR must be updated. Additionally, the AUAR must be reviewed and updated every five years until all development within the Study Area is complete.

Comment	Response
	The City of Hermantown is the governmental unit with the most approval authority over the project (see full permit list in Table 6 of Item 9 Permits and Approvals Required in the Final AUAR) and therefore is the RGU for this project. EQB Guidance specifies that “the AUAR must include a scenario based on the existing comprehensive plan. This scenario takes the place of the no build alternative required in an EIS.”
Errors, omissions, and other inaccuracies in Draft AUAR Despite the need for an EIS, the City has chosen to move forward with the AUAR process. The City should have incorporated input from commenters during the scoping phase, but several issues and gaps in information are still present in the Draft AUAR. Each of these must be addressed in the Final AUAR.	The Final AUAR has been updated to reflect several new evaluations and clarifications based on comments received during this comment period as noted in the comment response section above.
Construction The Draft AUAR fails to specify the timeframe for construction, stating that the “full masterplanned campus is anticipated to take more than 5 years to complete” without providing a precise estimate of the duration. Appendix H suggests that the “building construction” will take 4,309 days, or approximately 12 years. However, this estimate does not consider weekends, holidays, and periods when work cannot be completed due to foreseeable hazardous conditions (i.e. extreme cold or periods of intense wildfire risk). As such, the duration of construction is still undefined in the Draft AUAR. Such a vague construction timeframe makes it difficult for the public to evaluate the potential impact of the Project on the environment and the surrounding residential communities. As such, Commenters recommend Hermantown provide more detail on length of the Project’s construction phases, including a detailed timeline which lays out the anticipated duration for each Project component’s construction (i.e. time to construct each building and associated facilities, time to construct stormwater holding pond, time to scrape soil and replace with fill, etc.).	Anticipated construction activities, duration, noise, maintenance, and traffic have been updated in the Final AUAR in Item 6 Project Description and Item 19 Noise. Construction days listed in Appendix H is an upper estimate for duration and for greenhouse gas estimate purposes assumes a longer, maximum scenario. Due to the shallow groundwater in various areas that is perched on clay layers, dewatering during construction may be needed. It is not anticipated that significant dewatering efforts would be necessary to install below grade foundations/ utilities; however, the Project Proposer is committing to the following mitigation measures before and during construction: • Complete a pre-construction survey of groundwater elevations. The Project Proposer must report on the status of this survey to the City prior to construction.

Comment	Response
In its analysis of construction impacts, the Draft AUAR also fails to sufficiently analyze the environmental impacts and risks of potential dewatering. The Draft AUAR only states that “[i]f dewatering is to take place, adequate treatment must be provided so that nuisance conditions would not result from the discharge.” And while “[i]t is not anticipated that significant dewatering efforts would be necessary to install below grade foundations/utilities[,]” the Draft AUAR does not attempt to evaluate the potential impacts of such dewatering. The only requirement related to dewatering in the mitigation plan is that the “developer must obtain an MDNR temporary water appropriation permit for any temporary dewatering that may be needed for construction.” This does not exempt Hermantown from evaluating the impact of dewatering in this Draft AUAR. It is foreseeable that large-scale dewatering in this area will impact nearby residential water wells and could negatively impact both water availability and quality. By law, the state of Minnesota is expected to maintain groundwater “in its natural condition, free from any degradation caused by human activities.” However, the Draft AUAR currently fails to provide sufficient information on how prevention of groundwater degradation will be achieved or implement appropriate mitigation measures for dewatering.	● Monitor the groundwater table elevation from on-site wells for the duration of construction. The Project Proposer must report on the status of this monitoring to the City during construction. ● Monitor surface water quality from MDNR Public Watercourse S-002-010-003.4-001 located in the SE corner of the Study Area before and during construction. If any dewatering activities are required on site, piezometers or shallow wells would be installed within and on the perimeter of the Study Area to monitor groundwater during the temporary construction dewatering process to see if there are any significant (greater than 5 feet sustained for 72 consecutive hours) changes to groundwater levels. Any major non-seasonal fluctuations would result in the ceasing of dewatering operations. This is also in the Mitigation Plan and will be enforced by the City.
As such, Hermantown should perform a proper groundwater survey and attach its findings as an appendix to the Final AUAR. The Draft AUAR appears to contemplate these surveys would be performed but fails to include the results. The AUAR claims that “the Project Proposer is committing to . . . [c]ompleting a pre-construction survey of groundwater table elevation” and “[m]onitoring of groundwater table elevation from on-site wells during construction” Yet these surveys are not mentioned in the mitigation plan and appear to be voluntary commitments from the Project proposer which are not binding and may not be shared with the public.	The following are commitments in the Mitigation Plan that the Project Proposer will complete and the City will enforce: ● Complete a pre-construction survey of groundwater elevations. The Project Proposer must report on the status of this survey to the City prior to construction. ● Monitor the groundwater table elevation from on-site wells for the duration of construction. The Project Proposer must report on the status of this monitoring to the City during construction.

Comment	Response
	• Monitor surface water quality from MDNR Public Watercourse S-002-010-003.4-001 located in the SE corner of the Study Area before and during construction.
Because the current mitigation measures do not provide any meaningful guidance on how the environmental impact of dewatering will be mitigated (i.e. how groundwater would be treated, transported, how much dewatering can occur and when, etc.), more information must be included in the Final AUAR. As such, Commenters recommend the Final AUAR mitigation plan include a condition prohibiting any dewatering. In the alternative, the Final AUAR could require the groundwater surveys mentioned in the Draft AUAR and identify appropriate mitigation measures specifying how any dewatering must occur.	Due to the shallow groundwater in various areas that is perched on clay layers, dewatering during construction may be needed. A MDNR Water Appropriation Permit is required if a withdrawal exceeds 10,000 GPD or one million gallons per year. It is not anticipated that significant dewatering efforts would be necessary to install below grade foundations/utilities; however, the Project Proposer is committing to the following mitigation measures before and during construction: • Complete a pre-construction survey of groundwater elevations. The Project Proposer must report on the status of this survey to the City prior to construction. • Monitor the groundwater table elevation from on-site wells for the duration of construction. The Project Proposer must report on the status of this monitoring to the City during construction. • Monitor surface water quality from MDNR Public Watercourse S-002-010-003.4-001 located in the SE corner of the Study Area before and during construction. The Project Proposer will be responsible for implementing this with oversight by the City.
The Draft AUAR also fails to describe the impact of dust emissions associated with construction for the proposed Project. Although the Draft AUAR briefly describes how it may mitigate dust, there is no meaningful discussion on the impacts of dust emissions “on nearby ecosystems, residents, and workers[,]” as was requested by Healthy Professionals for a Healthy Climate (HPHC) in its	The Minnesota Pollution Control Agency (MPCA) regulates construction dust as "fugitive dust," requiring developers to prevent airborne particles from causing health concerns, visibility impairment, or surface water pollution. Best management practices include water spraying, surface

Comment	Response
Scoping Document Comment. This is concerning, given that significant amounts of dust from construction can accumulate on native plants, harming pollinators and other wildlife that rely on such plants. As such, the Final AUAR should include (1) a comprehensive study of the public health and environmental impacts of dust emissions, as well as (2) a detailed dust management plan, outlining the specific activities the Project developer must comply with to mitigate construction-related dust emissions and how frequently such activities should be performed. It is not adequate for the Draft AUAR to simply state that the City will regulate dust “in accordance with the standards set by the [Minnesota Pollution Control Agency (MPCA)].”	stabilization, and pavement sweeping during construction. See more info here: https://www.pca.state.mn.us/sites/default/files/p-sbap5-45.pdf. The Project Proposer must comply with these best management practices during construction. Further explanation of potential impact has been added to the Final AUAR in Item 17 Air. The Mitigation Plan has been updated to include the commitment that the Project Proposer must develop a Fugitive Dust Control Plan prior to construction.
Stormwater management - Additional analysis Commenters appreciate the City’s completion of a preliminary stormwater management plan for the Project and the inclusion of its results in the Draft AUAR. However, additional stormwater management plans referenced should also be completed and included in the Final AUAR. The Draft AUAR states that the “Stormwater Management Plan in Appendix C is based on a general plan with area assumptions based on the proposed Project” and that a “site-specific Stormwater Management Plan would be submitted at time of permitting.” Commenters recommend the results of this site-specific plan be included in the Final AUAR, as well, along with any relevant mitigation measures identified from this plan. Similarly, Commenters recommend that all additional stormwater analyses referenced in the Draft AUAR be completed and included in the Final AUAR. The Draft AUAR suggests that “[a]dditional detailed stormwater analysis would be provided at later stages of the design phase.” However, information from this additional analysis could yield key information about the potential environmental impacts of the Project. Allowing the developer to provide this information at “later stages of the design phase,” prevents the public from fully understanding the potential environmental impacts of stormwater now,	The post construction stormwater management plan is provided in AUAR in Appendix C. The post construction stormwater management plan includes the regulatory requirements in place for post construction stormwater. The additional analysis referenced includes the findings from the ongoing groundwater, surface water interaction study. The post construction stormwater management plan uses conservative estimates for impervious areas using a general site plan. Areas will be more refined as design continues; however, the AUAR sets the mitigation measures that must be adhered to as well as the framework for what final design must comply with.

Comment	Response
as the Project and the appropriate mitigation measures that the developer must implement are still being analyzed. MPCA stormwater permits issue without any opportunity for meaningful public comment, and therefore it is all the more important to include this information in the environmental review stage so that the public can understand the impacts and mitigation measures prior to permitting.	
Trout stream impacts Despite several commenters raising legitimate and well-supported concerns about the Project’s potential impacts on local trout streams, the Draft AUAR fails to adequately incorporate any of that information. The mitigation plan says the “[d]eveloper must coordinate with the MPCA and [Minnesota Department of Natural Resources (MDNR)] to ensure compliance with antidegradation policies and trout stream protections”¹⁹ However, there is no discussion of when this coordination will take place, whether these communications will be disclosed in the Final AUAR for public review, and whether or how any measures identified will be enforced. As such, Commenters recommend that all relevant communications between the developer and MPCA and MDNR be included in the Final AUAR, especially any agency recommendations for mitigating the Project’s impact on trout streams. This will give the public an opportunity to compare the agencies’ recommended mitigation measures to those adopted in the final mitigation plan. Additionally, the Draft AUAR disregards findings and recommendations from the Midway River Watershed Protection Study (MRWPS). For example, MRWPS specifically mentions this Project is “adjacent to two of the highest quality trout streams in the Midway River Watershed (West Rocky Run and Elm Creek) and contains many acres of forest, wetlands, and several prominent groundwater springs” within the proposed development area. As such, MRWPS concludes that “[h]eadwater areas and cold tributaries are under pressure from urban development, particularly in Hermantown and	We appreciate and understand the comments regarding the ecological significance of the nearby trout streams. The project is advancing additional regional and site-specific groundwater flow systems, surface water flow, geologic controls, groundwater recharge characteristics, and cold-water stream sensitivity modeling with existing conditions information and post-construction conditions to identify any potential mitigation measures that must be included in the final design. Multiple collaboration meetings with the project team, MPCA, and MDNR have taken place in June and July 2026 in response to these comments. Recommendations and mitigation strategies from these agency meetings are documented in the Final AUAR and will continue into stormwater permitting. This Study Area was selected as a priority over other potential sites in the area that were explored, due to its proximity to existing power infrastructure with the Arrowhead Substation, cohesive land within the city with availability to extend municipal water/sewer infrastructure to the site, the ability to minimize wetland and tree impacts compared to other sites, depth to bedrock, and close access to existing County/State highways for ease of construction and operational access. In sum, these attributes minimized environmental conditions and constraints. See also response

Comment	Response
near the East Rocky Run Watershed” and offers concrete suggestions for projects (including this proposed data center) in these areas, to help minimize potential harms to brook trout. However, the Draft AUAR fails to incorporate these suggestions into the mitigation plan. The most obvious solution to this particular issue is to move the Project elsewhere so that it won’t impact these extremely important trout streams – this is an alternative that should be fully explored in environmental review. But if the developer and end user are unwilling to do so, and the Project remains proposed at this site, the City must meaningfully incorporate the site-specific recommendations from the MRWPS (listed in Appendix A1 of the study), including but not limited to: · Restoring wetlands and natural stream channels in heavily developed/ditched/modified headwaters tributaries to East Rocky Run with cold water temperatures · Protecting existing wetlands and headwaters tributaries · Protecting land around Coldwater Protection Areas from further development and contamination · Maintaining or improving forested buffers · Replacing road culverts to restore full connectivity A failure to adequately consider these impacts and appropriate alternatives or mitigation measures will cast serious doubt on the overall adequacy of the Final AUAR. In order to achieve many of the above mitigation measures, the Project may need to alter its design to not include all the buildings currently proposed, especially those that necessitate destruction of wetlands and forested buffers. These are alternatives that should be fully evaluated in the environmental review.	in Public Comment response table with more information on alternative sites/uses under the category “Comments Proposing Alternatives”.
Hazardous waste - E-waste	The amount of e-waste generated by the project will vary over the life of the project, and the mass of e-waste will vary

Comment	Response
The Draft AUAR fails to clearly or sufficiently describe the scope of electronic waste (e-waste) generated when the Project is operational. The Draft AUAR states that “2,204 to 5,511 tons per year is anticipated for office/light industrial waste that typically includes paper, plastic, electronic, cardboard, metal, and glass waste.” The exact amount of E-waste is not specified but is instead lumped in with a broad estimate of the office/light industrial waste expected from the Project. As such, the public cannot determine how much e-waste will be generated from this project. This issue/omission is compounded and confused by the fact that guidance on the management of e-waste is unclear. The Draft AUAR specifies that “[f]or solid waste generated from the completed Project, a source recycling/separation plan must be implemented, and wastes that cannot be recycled must be managed in accordance with state regulations and guidelines” That plan was not provided in the Draft AUAR, and the current Minnesota state regulations and guidelines for recycling and managing e-waste are grossly insufficient. And while the Draft AUAR asserts that Google “maintains strict management through its reverse logistics” and ensures “[a]ll equipment is managed to be reused, remarketed, or recycled, ensuring that no e-waste goes to landfills,”²⁶ these voluntary commitments are unenforceable on their own and insufficient to assuage concerns regarding e-waste management. Google can write general statements about the lack of environmental impact and claim sustainability, but unless these recycling and sustainability initiatives are specified, analyzed, and included in the Draft AUAR and incorporated into an enforceable mitigation plan and as a condition of any permitting, they will not be binding on the company. Accordingly, Commenters recommend that the Final AUAR include the source recycling/separation plan and incorporate Google’s voluntary sustainability measures (as a minimum) into the final mitigation plan and as mandatory conditions of any City permitting.	based on design factors. E-waste would not be disposed of through Hermantown’s Municipal Solid Waste system. Because final design has not been developed, and internal data center components are not yet known, the project proposer cannot yet develop a source recycling/separation plan. Although a recycling/separation plan cannot be developed at this time, the mitigation plan includes a condition that requires the project proposer to develop a plan for solid waste handling. In addition, an additional requirement has been added to the Final AUAR Mitigation Plan to require the project proposer to provide the City with proof that it has obtained a minimum of UL 2799 or an equivalent certification within 18 months of start of operations.

Comment	Response
Backup generation fuel storage Hazardous materials associated with backup generation are not sufficiently defined or identified in the Draft AUAR. The proposed Project “may include backup generators for emergency electricity use[,]” but the “[s]pecific backup generators fuel needs have not yet been defined.”²⁷ As such, there is no way for the public to know what type of fuel will be stored within the project area, and the risks associated with such storage. Any argument that the actual backup generators needed for this project is not foreseeable is entirely noncredible. Google can either state with certainty how many generators will be used (this project likely cannot proceed without a plan for on-site energy resources), or point to other completed Google facilities as a proxy; there is absolutely no justification for leaving this data point blank, as the Draft AUAR now does. The mitigation measures for backup generation fuel storage in the Draft AUAR are similarly insufficient. Currently, the mitigation plan only requires that the “developer . . . prepare a spill prevention plan for any fuel stored on site.”²⁸ This spill prevention plan is not included in the Draft AUAR, and it is unclear if the public will have an opportunity to review the plan prior to permit authorizations. To address these gaps, the Final AUAR must include a discussion of the fuel needs and storage requirements for backup generators. This should encompass the type of fuel used and the amount to be stored on site, as well as an analysis of the exposure of the stored fuel to wildfires, flooding/flash flooding, tornadoes/straight-line winds, or other foreseeable climate hazards. The Final AUAR should also include a completed spill prevention plan, as described in the Draft AUAR.	While the specific generation needs will be determined with final site design, the AUAR evaluated potential impacts from backup generation for a maximum-case scenario of 16 x 2.75 megawatt (MW) diesel-fired emergency generators, for a total of 44 MW of backup generation. These impacts are discussed in the Air, Noise, and GHG sections. Item 13 Contamination/Hazardous Materials/Wastes section has been updated in the Final AUAR to include fuel quantity and storage requirements related to this quantity of emergency generators. A spill prevention plan would be completed as part of construction planning and a compliant plan must be facility-specific and prepared according to EPA standards.
Water appropriation The water usage associated with the Project is not sufficiently described in the Draft AUAR. The Project is anticipated to use 50,000 gallons per day (GPD), from Lake Superior, only for domestic wastewater. Table 16 describes two	As described in the AUAR, the proposed Project would receive water from the City of Hermantown. The City of Hermantown purchases all potable water from the City of Duluth. The City of Duluth obtains its potable water from

Comment	Response
additional foreseen non-domestic water usage requirements, associated with a closed loop cooling system: 1.7 million gallons initially per building for commissioning the system and up to 2,000 gallons monthly per building for maintenance needs. The mitigation plan states that the Project “must be limited to the water use volumes studied in the AUAR[,]” but estimated water use varies significantly depending on the frequency of maintenance and the number of buildings to be constructed—scenarios and issues that are insufficiently analyzed in the Draft AUAR. The result is that the public has no way to accurately estimate how much water the Project will consume, or to know whether or how the mitigation plan may adequately address those impacts. As such, Commenters recommend the Final AUAR include the exact water quantity the Project will be “limited to.” If multiple volumes are being considered, each should be studied in an alternatives analysis, with a similar level of detail to an EIS. The Final AUAR should also describe the specific design details for all cooling systems under consideration, including how the water will be used in the system and the necessary treatment that must occur following its use. Additionally, the AUAR lacks important details regarding how phasing will occur for the commissioning and maintenance of the closed-loop cooling system. Although all water for the Project is supposed to be sourced from Lake Superior, and “phasing of water use for commissioning, and maintenance would be coordinated with the City of Hermantown for any additional implementation needs[,]” nothing in the Draft AUAR suggests that this coordination has occurred, or if it will occur prior to permit approvals. This is concerning because, at 50,000 GPD, the domestic use of water for the Project is already a very large proportion of Hermantown’s overall daily water use—1/8th of the City’s current average use, excluding any water needed for non-domestic purposes. As such, prior to the Final AUAR, Commenters recommend that all necessary coordination be completed between the Project developer, the data center	Lake Superior, treats it, and stores it in water reservoirs. Duluth has used water from Lake Superior since 1898, as documented on the City webpage: https://duluthmn.gov/public-works-utilities/utilities/water/. The AUAR evaluated a maximum design scenario of 4 buildings, and the water use in Table 18 is based on that maximum studied. Future projects must be consistent with the development assumptions in the AUAR. The water demand outlined in Table 18 of the Final AUAR remains a conservative upper-bound estimate, inclusive of ongoing operational/domestic water usage (i.e. showers, laundry, kitchen / food preparation, landscaping, fire protection) as well as a temporary, one-time water demand associated with initial commissioning activities, including filling of the closed-loop cooling system. The Project Proposer has coordinated with the City of Hermantown to ensure this proposed water use is within current water supply capacity. The proposed development would utilize a non-evaporative system (dry or air cooled) for cooling and would not withdraw groundwater or surface water. No production wells, high-capacity wells, dewatering systems, or consumptive process water use are proposed during operations. As such, the Project does not require appropriations permitting under Minn. Stat. § 103G.271 and is not expected to directly affect aquifer storage, groundwater levels, or regional groundwater flow.

Comment	Response
end user, the City of Hermantown, and other local municipalities/organizations using water from Lake Superior (such as the cities of Duluth and Cloquet). The Final AUAR and city permit should also include a binding phasing plan as an enforceable mitigation measure and a condition of any permits. And if different methods/timelines of phasing are considered, each should be treated as an alternative, with a corresponding EIS-level analysis of the alternatives. Additionally, Commenters recommend that the Final AUAR include mitigation measures to prohibit any loss of water from the Lake Superior watershed, including a ban on evaporation of city water through a water-cooling system that results in any loss of water from the watershed. There should also be a condition that each individual building (or at least the four data center buildings) be equipped with a water meter, and that water use at each building/meter is reported and the information be made publicly available on a city website on a monthly and annual basis. The Final AUAR should also restrict the destruction of any wetlands (from groundwater extraction) in the headwaters of the Lake Superior watershed or provide greater analysis of such impacts.	
Cooling system As noted above, the Draft AUAR fails to sufficiently describe the cooling system for the Project. First, rather than meaningfully describing the exact water use associated with each cooling system, the AUAR merely states “water may be used as part of data center cooling.” Additionally, although the AUAR claims that “either a closed-loop or air-cooled system” will be used, no information is given on the design details for each system being considered (such as the process for ejecting heat, any chemicals or refrigerants that will be used in the cooling process, and the potential environmental impacts of each system). As such, the current information in the Draft AUAR prevents the public from truly understanding the environmental impacts of each cooling system proposed.	Item 12 Water Resources in the Final AUAR has been updated to include a list of the makeup of the wastewater from the closed-loop water cooling system. All additives utilized in the system are strictly free of PFAS (per- and polyfluoroalkyl substances). All additives will be managed, stored, and applied in strict accordance with their respective Safety Data Sheets (SDSs) and applicable federal, state, and local environmental regulations. Because this is a closed-loop system, environmental exposure is minimized to controlled maintenance or closed drainage events. The makeup of the wastewater associated with the commissioning process would be coordinated with Western Lake Superior Sanitary District (WLSSD) to ensure it is acceptable for sanitary sewer discharge or whether it is

Comment	Response
The Draft AUAR also makes misleading claims about the environmental impacts of the closedloop and air-cooled systems proposed. For a the closed-loop system, the Draft AUAR claims that “water use would occur only during the initial startup and would not represent a recurring longterm operational demand aside from occasional maintenance needs” But closed-loop systems still “need to remove heat from the liquid loop — and the data center building itself” which, for “Google, . . . means using some form of evaporative cooling.”⁹ In fact, “water is often the most effective method, [for expelling heat] especially when it’s above 85 degrees[,]” which will likely be the case in Hermantown, during the summer months. Nevertheless, the AUAR does not provide any detail on how the closed-loop cooling system will reject heat, instead, the AUAR gives a vague overview of how a closed-loop system functions and simply says it “rejects that heat to outside air,” with no further details. This is wholly inadequate since both water use and heat island effects are major environmental issues identified in the scoping phase of this environmental review	required to be hauled off-site or otherwise managed separately in accordance with state and federal regulations. Additional detail, including a diagram explaining closed-loop water cooling systems, has been added to the Final AUAR.
The Draft AUAR also fails to describe the environmental impacts of any chemicals used in the proposed cooling systems. Although the Draft AUAR claims that the wastewater for the closedloop system “would be coordinated with Western Lake Superior Sanitary District (WLSSD) to ensure it is acceptable for sanitary sewer discharge[,]” there is little information on what chemicals or pollutants may be used in the water for the closed-loop system (and how such chemicals would be treated and disposed of). This is especially concerning, given that some data centers are known to use PFAS-class chemicals as a part of their cooling systems. Therefore, it is important for the Final AUAR to address the potential impact of chemicals used in the closed-loop cooling system process and provide a plan with appropriate mitigation measures to deal with any contaminated water that could be removed from the closed-loop system after its commissioning and maintenance. Additionally, the Final AUAR should discuss how this project will comply with Amara’s Law and other Minnesota laws that pertain to PFAS.	See response above - all additives utilized in the closed-loop system are strictly free of PFAS (per- and polyfluoroalkyl substances).

Comment	Response
Finally, the AUAR fails to meaningfully discuss how using an air-cooled system will impact the energy needs of the facility. It may be true that “[d]ry-cooling and air-cooled chillers . . . do not evaporate water as part of their process.” However, as described by Google’s own representative in a recent article from Politico, when a data center “move[s] away from evaporative cooling towards air-based cooling, energy consumption goes up dramatically, as do the emissions” However, the current Draft AUAR fails to clearly describe the different energy needs for the closed-loop and air-cooled cooling systems considered and the emissions impacts associated with each. For the public to understand the potential energy and climate impacts for each cooling system, as well as the heat island impacts that can be attributed to either technology, this information must be analyzed and included in the Final AUAR.	Data centers generate heat and often use water as a highly efficient means of cooling that requires less energy than air-cooling technologies. Generally, dry-cooled systems perform better in colder climates, and air-cooled systems in hotter climates. However, both technologies are suited for vast ranges of temperatures. For this project dry-cooling or air-cooling was chosen to minimize water consumption, and the electricity needed to power the cooling system is incorporated into the electricity amounts studied in the AUAR.
Land use impacts - Groundwater impacts The groundwater analysis in the Draft AUAR is inadequate and incomplete. The Draft AUAR claims that the “presence of intermittent or unmapped groundwater discharge features cannot be entirely excluded given site geology and topography.” As such, “[i]f groundwater seepage or spring flow is encountered during construction, the Project Proposer would implement an adaptive management response consistent with MPCA and MDNR best practices” However, the Draft AUAR’s groundwater analysis does not examine all the groundwater features within the study area and it appears that the mitigation measures described above would only be determined after construction for the Project had already begun (at which point sensitive groundwater features may already be damaged or entirely destroyed). Additionally, while the Draft AUAR hints that additional groundwater analyses could be performed, it is unclear if these will be completed prior to the Final AUAR. For example, the AUAR says that “two lines of evaluation” will be performed by the Project proposer: (1) a spring inventory; and (2) survey and a groundwater–surface water interaction and thermal evaluation. These analyses would provide a “framework for evaluating whether changes in shallow groundwater conditions could influence nearby streams and aquatic	An on-site spring study is currently underway, and the findings will be provided to the City, MPCA, and the DNR once complete this fall 2026. A progress update of the spring study findings is included in Item 12 Water Resources. The AUAR includes mitigation measures to reduce impacts to groundwater resources, and the spring survey will help inform more specific locations (if needed) for avoidance, minimization, monitoring, and mitigation as part of the final project design and operations.

Comment	Response
resources and quantify to what degree, if any, the proposed land use changes affect groundwater recharge rates and offsite hydrology.” As mentioned previously, the Project is adjacent to multiple trout streams, and groundwater features within the study area may be essential for the feeding and preservation of those streams. This groundwater is also likely the source of drinking water for numerous households that are adjacent to the project site. The additional groundwater analyses described above could be essential for informing the mitigation measures necessary to protect sensitive environments adjacent to the project site, such as trout streams (not to mention public health). However, the Draft AUAR only says these evaluations will occur sometime in 2026 and will “inform final site design and permitting applications as design advances.” It is not clear whether these important analyses will be included in the Final AUAR or made available to the public in another way. Given the particular importance of this information, due to sensitive aquatic environments near the project site and the clear risk to drinking water in resident’s wells, the Final AUAR must include the results of these or similar studies, and corresponding mitigation measures informed by such studies, to mitigate the Project’s impact on sensitive aquatic environments surrounding the project area.	
Wetland impacts The Draft AUAR fails to meaningfully mitigate the Project’s impact on wetlands within the study area. The Draft AUAR claims that there will be “[s]ome wetland impacts, including draining, filling, cutting, and vegetative removal,” with “32 acres of wetlands lost from the Project. The Draft AUAR also states that the developer would mitigate any wetland impacts “to the extent practicable by locating Project facilities outside of delineated wetlands, and comply with wetland mitigation requirements.” But the phrase “to the extent practicable” lacks any meaningful description of which wetlands might be protected from destruction and how harms will be mitigated.	Final permanent impacts to wetlands, including the exact location, acreage, and nature of the impacts (i.e., fill, excavation, or vegetation removal), will be determined. When these impacts are known, the Project will be required to submit a Joint Application Form to the Wetland Conservation Act (WCA) Local Government Unit (LGU) and the U.S. Army Corps of Engineers for approval. Under WCA, “sequencing” is required before wetlands can be drained, filled, or altered. Sequencing includes wetland avoidance as a first step, minimization of wetland impacts as

Comment	Response
This is especially concerning because the current proposal appears to destroy key wetlands with important environmental benefits. Table 8 of the Draft AUAR describes different soil types within the project area, one of which is 14.4 acres of “[t]acoosh mucky peat” soil, which is indicative of a peatland. The next page provides a figure showing a peat wetland in the northeast part of the Project footprint.⁵⁶ However, Appendix A of the Draft AUAR (the proposed buildout of the data center) suggests that the development of “LOT 4 BLOCK 1” will be directly on top of this peat soil type wetland, completely destroying 14.4 acres of peatland within the project area. This is a major concern because peatlands “play a critical role in the global carbon cycle.” These wetlands are responsible for storing up to “up to 30% of the world’s terrestrial carbon[,]” and their protection and restoration has been identified as a goal in Minnesota’s Climate Action Framework. Additionally, the Draft AUAR’s specified mitigation measures are insufficient to meaningfully conserve key wetlands. The Draft AUAR suggests there will be additional “wetland mitigation requirements through the purchase of wetland banking credits and performing a comprehensive Sequencing Analysis in accordance with Minn. R. 8420.0520.” However, the Draft AUAR does not specify who will perform this analysis, when it would be performed, and whether the results will be made public. It is also important to acknowledge that the purchase of wetland banking credits is not an adequate mitigation measure for the destruction of important wetlands, especially peatlands. The wetland banking credit system allows for the purchase of “credits” created “through the restoration, creation or enhancement of wetlands.” By destroying a peatland, important carbon sequestration benefits are lost permanently which cannot be undone by purchasing a credit based on the creation of an artificial wetland. As such, allowing the developer or end user to purchase credits ignores the importance of peatlands and fails to meaningfully mitigate the actual environmental effects from the destruction of that resource. The impact of digging up, draining, or filling a peatland must be fully analyzed and reported in the Final AUAR, and the developer or end user must not be allowed to replace these	a second step if complete avoidance is not possible, and replacement as a final step. Replacement requires restoration, creation, or replacement to account for all wetland loss. The proposed Project will follow the WCA sequencing requirement and will avoid wetland impacts to the extent practicable. All wetland impacts will be mitigated with an approved WCA wetland replacement plan. Under WCA, there are two forms of wetland replacement. The first option is wetland banking, which involves the purchase of wetland credits from an established, pre-approved wetland bank. The second option is to create a new wetland. Purchase of wetland credits is both the most common method of wetland replacement and the preferred method for most LGUs. The proposed Project will be required to obtain WCA-approved wetland replacement plan prior to disturbing wetlands. The Project Proposer is committed to a site design that does not place buildings or impervious surfaces in peatland. If peat wetlands are ultimately impacted by the project, the wetland replacement plan could include conditions to account for this (a higher mitigation ratio would be one example). The above items (impacts, sequencing, wetland replacement, and special considerations) will be included in the Joint Application Form which is the responsibility of the Applicant as defined by WCA. A WCA Notice of Decision and compliance to mitigation requirements will be required before wetlands can be impacted.

Comment	Response
key environments with artificial wetlands which do not provide the same beneficial environmental and climate effects. It goes without saying that wetland credits from elsewhere will do nothing for preserving trout streams in Hermantown, as well. As such, Commenters recommend the Final AUAR prohibit the destruction of any wetlands—especially the peatlands located in the project area—by moving the Project or limiting its development to buildings that do not cover any extant wetlands. However, if the developer and end user are unwilling to change the location of their Project, the Final AUAR must at least identify detailed mitigation measures and enforcement mechanisms to protect key wetlands and prohibit the destruction or filling of any peatlands or calcareous fens. The environmental review must include an alternative that leaves the 14.4 acres of peatland intact and connected to the groundwater that it currently links to.	
Lastly, the Draft AUAR does not sufficiently evaluate the impact of stormwater runoff on wetlands within and surrounding the study area. The AUAR states that “85 percent of this site drains eastward through wetlands and collects in ephemeral stream segments prior to leaving the site and entering Midway River.” However, the current analysis of groundwater and stormwater management does not evaluate how the Project could affect the recharge rates or erosion of these wetlands (surrounding the study area). The Final AUAR must address this gap and how a loss of this water storage will impact nearby wells and flooding.	Rate attenuation would be achieved by providing large storage volumes in the onsite basins and safely releasing the treated stormwater through an engineered outlet structure and culvert. These stormwater basins would be able to hold stormwater generated from the site in extreme storm events such as the 100-year storm. By providing an elevated pond volume, this project would protect nearby properties from flooding and soil erosion. The AUAR includes mitigation measures to reduce impacts to groundwater resources and the spring survey will help inform more specific locations (if needed) for avoidance, minimization, monitoring, and mitigation as part of the final project design and operations.
Tree cover The number of trees which the proposer must plant as a part of the Project is not clearly described. The AUAR states that 10,783 trees will be removed as a	The AUAR acknowledges that implementation of the development scenario would result in the removal of a substantial portion of the existing tree cover within the

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result of the Project, and that just 245 new trees will be planted as a replacement. The “[e]xact number” of trees planted is “to be determined as design plans advance,” but this guidance is vague and leaves the Project proposer with unlimited discretion to choose the final number of trees to plant. Without a concrete number for how many trees the Project proposer must plant, it is difficult for the public to truly understand the impact that the Project will have on the ecology of the surrounding area over time. This level of vagueness makes the Draft AUAR’s analysis totally meaningless on this point. In the Final AUAR, the mitigation plan must set a clear, enforceable requirement to plant, water, and maintain a minimum number of native trees that are appropriate to Hermantown and the area’s ecological needs, rather than allow the developer or end user to choose a number on their own. This should be done in consultation with ecosystem experts at tribal governments and from state agencies (including the Cloquet Forestry Center).	Study Area. The AUAR evaluates the maximum scenario for proposed tree and other resource impacts and applicable mitigation that would be required. As site design is finalized, the specific tree impacts will be addressed during subsequent permitting or approvals. The Project Proposer’s intent is to minimize these to the extent practicable through further site design refinement. The City of Hermantown does not have a tree preservation, tree replacement, or tree mitigation ordinance that establishes specific requirements for preserving existing trees or replacing trees removed during development. A related requirement is in regard to screening / buffering, which the project design must adhere to. While the proposed development cannot fully replace the ecological functions associated with existing forested areas, several measures are incorporated into the development framework to reduce environmental effects such as preservation of wetlands, implementation of stormwater best management practices designed to meet applicable regulatory standards, incorporation of green infrastructure elements where feasible, and installation of new landscaping and replacement trees throughout developed portions of the site. These measures are intended to maintain water quality functions, reduce runoff, provide some replacement vegetation, and support site aesthetics.
Wildlife impacts - Wild rice waters The Draft AUAR does not currently discuss the potential impact of the Project on wild rice/Manoomin located downstream of the project site. The MDNR is currently working with a coalition of tribal and federal governments, and conservation stakeholders managing the St. Louis River Restoration Initiative,	The proposed Project is advancing additional regional and site-specific groundwater flow systems, surface water flow, geologic controls, groundwater recharge characteristics, and cold-water stream sensitivity modeling with existing conditions information and post-construction conditions.

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which includes efforts “to increase the abundance and distribution of self-sustaining wild rice within the St. Louis River estuary” Tens of millions of dollars of public money have been spent on this restoration initiative and the potential to upset that effort is environmentally and financially significant. As such, the impacts of this project on the St. Louis River Restoration Initiative and its wild rice/Manoomin investments should be fully evaluated in the Final AUAR. When viewed as a totality of significant impacts, this issue deserves more attention because the Project demonstrably has the potential to cause harm to wild rice/Manoomin in the St. Louis River Estuary. As discussed in the stormwater and groundwater sections of this comment, this project could increase stormwater runoff and interrupt groundwater flow due to the increase in impervious surfaces from the Project’s development. Such impacts could cause harm to sensitive organisms in surrounding aquatic environments, including wild rice in the St. Louis River, by increasing the flow and temperature of waters downstream of the project site. This is especially concerning, because the Project sits next to multiple streams which feed into the St. Louis River Estuary and wild rice is particularly sensitive to water temperature, requiring “[a] cool period with water temperature below 35°F for 3 to 4 months to sustain dormancy . . . prior to germination.” As such, Commenters recommend that before the Final AUAR is published, the City consult with tribal governments, inter-tribal organizations, and the MDNR on this Project’s potential to impact wild rice/Manoomin. The City should also hold public meetings so that the relevant parties and stakeholders in the St. Louis River Restoration Initiative can discuss the potential harm to the estuary from increased heat and sediment pollution through stormwater runoff. If agreed upon by tribal governments, inter-tribal organizations, and the MDNR, a detailed study evaluating the potential impact that this Project could have on wild rice/Manoomin in waters downstream of the project site should also be completed. The Final AUAR must also include specific mitigation measures to protect wild rice/Manoomin in the St. Louis River Estuary.	This will demonstrate any potential risk of degradation to nearby water resources and, therefore, wild rice/Manoomin. Results will be used to identify any potential mitigation measures that must be included in the final design. Multiple collaboration meetings with the project team, MPCA, and MDNR have taken place in June and July 2026 in response to stormwater impacts on water quality comments. Recommendations and mitigation strategies from these agency meetings are documented in the Final AUAR and will continue through stormwater permitting for future phases with agency review.

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Birds The AUAR failed to adequately respond to Commenters’ concerns regarding the impact of the Project on birds. As mentioned in Commenters’ Scoping Comments, there are four important birding areas/bird habitats located around the project location (Sax-Zim Bog to the northwest; the South-Central Northshore and Hawk Ridge Nature Reserve to the northeast; and the St. Louis River Estuary to the southeast). The Draft AUAR refuses to evaluate how the Project may impact birds in any of these areas and instead merely states that “[n]o migratory waterfowl feeding/resting areas or designated wildlife lakes are present within or adjacent to the Study Area.” The study area is confined to the 1.8 million square feet of the facility. Such a narrow scope of analysis necessarily misses the real, foreseeable impacts on bird populations that exist outside of, but in extremely close proximity to the study area. Birds are notoriously capable of flight. This means they are highly mobile and can cover large regions by air, land, and water. As such, they are impacted by developments (such as this Project) which result in significant noise and light pollution and reduce tree cover and nesting areas near important sites, even if they do not spend all of their time in those specific locations. There are obvious potential impacts that the development could have on birds that should be evaluated. The Final AUAR must be appropriately scoped to consider how animals, like birds, may migrate through, around, and near the study area, not just within the literal Project footprint. The Draft AUAR also fails implement U.S. Fish and Wildlife Service (USFWS) recommendations for protecting migratory birds into the mitigation plan. The Draft AUAR mitigation plan requires tree clearing activities to be restricted to winter months (October 1 through April 14). Apparently, this limitation was based on the field species and habitat review for the study area “and	Conversion of natural areas to developed areas can contribute to habitat loss for birds. Based on the characteristics of the Study Area, the Study Area could provide habitat for birds. While birds are highly mobile and individual birds may utilize habitats both within and outside the AUAR Study Area, the project is not located within a designated Important Bird Area (IBA)¹, National Wildlife Refuge², or other recognized high-value avian habitat. The project is located within the broader Lake Superior North Shore Highlands migratory bird corridor, which extends from Duluth to Grand Portage along the north shore of Lake Superior. Studies have found that migrating birds relate to the shoreline and adjacent ridgelines, and that migratory bird densities generally decrease with increasing distance from the shoreline³. Because the project is located approximately eight miles west of the Lake Superior shoreline, impacts to regional migratory bird movements are not anticipated. The proposed Project would also not directly alter or disturb the identified regional birding areas such as Sax-Zim Bog, Hawk Ridge, and the St. Louis River Estuary, which are all located outside of the Study Area, and miles away. For example, the Sax-Zim Bog is over 30 miles from the Study Area, Hawk Ridge is 12 miles from the Study Area, and the St. Louis River Estuary is six miles away, all as the bird flies. Although the project would result in the removal of forested habitat within the development area, these impacts are expected to

¹ Source: <https://gis.audubon.org/portal/apps/dashboards/1742bc47f980490da9c23e23dc4d5e86>

² Source: See IPaC in Appendix E of AUAR.

³ Source: https://files.dnr.state.mn.us/eco/nongame/projects/consgrant_reports/2012/2012-north-shore-bird-migration-final-report.pdf

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consultation results from the USFWS and the MDNR . . .” Notably this does not include required consultation with impacted tribal governments. However, in Appendix E, which includes the consultation emails with USFWS, the agency states that it “encourage[s] implementation of recommendations that minimize potential impacts to migratory birds. Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31).]” As such, the Draft AUAR’s mitigation plan appears to disregard USFWS’s recommended restrictions on clearing forested habitat and, instead, allows the Project developer to continue tree clearing a month and half into the nesting season for migratory birds. This not only blatantly disregards federal agency guidance, it also creates an unacceptable risk for migratory birds, which are federally protected under the Migratory Bird Treaty Act (MBTA). The Draft AUAR acknowledges “USFWS has the responsibility under the MBTA to prevent the mortality of migratory birds and provide recommendations to mitigate or reduce potential impacts to migratory birds[.]” However, despite this acknowledgement, USFWS’s recommendations have not been incorporated into the draft mitigation plan. Accordingly, the Final AUAR must amend the mitigation plan to strictly follow USFWS guidance on migratory birds, including prohibiting tree clearing during nesting season (March 1 through August 31), as recommended by USFWS. It must also include any mitigation measures deemed necessary by tribal government resource experts.	be localized and there is extensive forested habitat remaining in the surrounding area. It is also noted that this area occurs within municipal boundaries and is zoned for industrial development which is consistent with the proposed Project. NLEB is not listed on the IPaC; therefore, federal tree clearing restrictions do not apply. Tree clearing dates have been updated in the AUAR based on MDNR recommendations of avoiding tree clearing during NLEB pup season from June 1 to August 15. The IPaC did not identify any endangered or threatened birds within the study area. Likewise, as noted in the AUAR, the American Goshawk (Species of Conservation Concern) was noted by MnDNR approximately 0.9-mile from the Study Area. The IPaC identified nine Birds of Conservation Concern (BCCs) within the Study Area. Based on the probability of presence survey data, the nine BCCs and Bald and Golden eagles could occur year round. Therefore, tree clearing restrictions to avoid impacts to all species is not feasible. Based on the probability of presence survey data, BCCs have the highest probability of presence to occur within the Study Area between May and August, most of which overlaps with NLEB pup season. One USFWS avoidance and minimization measure to protect migratory birds is avoiding tree clearing during the general migratory bird nesting season (March 1 to August 31). In northern Minnesota, peak migratory bird nesting season

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	ranges from approximately May 1 to August 15⁴. Most of the northern Minnesota migratory bird nesting season overlaps with NLEB pup season, in which tree clearing will be avoided. Avoiding tree clearing during nesting season is not a USFWS requirement. USFWS provides a Nationwide Avoidance & Minimization Measures for Birds (issued July 2024)⁵, several of which the proposed Project has committed to as outlined in the mitigation section of the AUAR. The project will comply with guidance set forth in the MBTA. Additionally, the project will comply with local ordinances regarding lighting and noise.
The Draft AUAR also fails to meaningfully evaluate the Project’s impact on federally protected bald and golden eagles. As described in the Appendix E USFWS consultations, “[t]here are Bald Eagles and/or Golden Eagles in [the] project area” and “[i]t is the responsibility of the project proponent to survey the area for any migratory bird nests.” Accordingly, USFWS recommends “avoiding and minimizing disturbance to eagles whenever practicable” and seeking a permit “[i]f you cannot avoid eagle disturbance[,]” including “[a] nest take permit . . . for removal, relocation, or obstruction of an eagle nest.” However, the AUAR does not discuss bald and golden eagles anywhere in the main body of the Draft AUAR or mitigation plan and recommendations from USFWS are not included in the mitigation plan. This issue must be addressed in consultation with tribal governments. To ensure project complies with the Bald and Golden Eagle Act (BGEA) and USFWS and tribal government guidance, Commenters recommend the Final AUAR include a detailed study evaluating the potential for the Project to impact bald and golden eagles and their nests. This should also include nest	Coordination with the MDNR did not identify the presence of any known Bald or Golden Eagle nests within the study area. A high-level species survey was completed on site which additionally did not identify the presence of any Bald or Golden Eagle nests. The project will adhere to USFWS Incidental Take guidelines which require a 660 foot buffer around Bald or Golden Eagle nests should one be identified. The AUAR has been updated to discuss the BGEA in Item 14.

⁴ Source: <https://www.dot.state.mn.us/project-development/subject-guidance/fish-wildlife/>

⁵ Source: https://www.fws.gov/sites/default/files/documents/2024-07/nationwide_avoidance_minimization_measures_birds_0.pdf

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surveys prior to the removal of any trees and a discussion about whether any take permits will be required and obtained before any action occurs that might result in a taking under the BGEA.	
Species of tribal concern It appears from the Draft AUAR that the City failed to consult with Tribal Nations and inter-tribal resource management organizations and consider Indigenous perspectives on the Project’s wildlife impacts. As described in the Draft AUAR, the impact of the Project on wildlife was conducted through a “field species and habitat review for the Study Area . . . and consultation results from USFWS and MDNR” to determine if any “federal- and state-listed threatened and endangered species were identified for their potential to be affected by this Project.” However, the Draft AUAR does not make any attempt to evaluate how the Project could impact species of tribal significance or incorporate traditional ecological knowledge (TEK) into the wildlife impacts analysis. The City—not the developer—must meet its legal obligation for government-to-government consultation with interested tribal governments and inter-tribal organizations on all potentially impacted tribal species of concern, and any management or restoration strategies underway in the project area. This must be done before the Final AUAR, and the City should not take any final action without completing consultation. Additionally, in the Final AUAR, tribal perspectives and TEK should be included in the wildlife impacts analysis and all other matters of interest to tribal government resource managers.	The City acknowledges the Fond du Lac Band's request for government-to-government consultation on the Project. Independent of the environmental review process, the City will initiate outreach to engage in government-to-government consultation with the Fond du Lac Band regarding the Project. The City is committed to this consultation continuing outside the AUAR review timeline.
Lighting impacts The Draft AUAR lacks clarity on how the impact of lighting on wildlife will be mitigated. The Draft AUAR states that the “Proposer would follow guidance from the USFWS to minimize blue light, uplight, and backlight to the extent practicable.” But the USFWS resource cited in the Draft AUAR makes it clear that there are no enforceable standards when it comes to lighting, only suggestions. Without specific mitigation and enforcement measures, there is	The lighting design for the data center campus would utilize down-lighting, fully shielded cut-off fixtures, and would fully comply with the City’s lighting ordinance to prevent any light pollution. Specifically, the lighting plan for the data center campus has been designed to:

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nothing to ensure that the Project won't exceed even the anticipated lighting impacts described in Appendix G. Furthermore, the mitigation plan only says that "[d]evelopment must conform with the city ordinances for building height, building form, and lighting intensity to avoid impacts to neighboring properties and species[,] but fails to specify (or even cite to) what these ordinances and their requirements are in the Draft AUAR. This prevents the public from reviewing and understanding the standards for lighting that the Project will be held to and omits key information from the administrative record. Accordingly, the Final AUAR should include specific mitigation measures to ensure downward facing, shielded, low wavelength lighting is used for all outside lighting fixtures in the study area during the operational phase of the Project. Mitigation measures should also incorporate the suggestions from Starry Skies North's Scoping Comment. Additionally, the Final AUAR would be improved by explaining why the photometric plan contemplates minimal lighting impacts but appears to list lights that could emit as much as 130,857 lumens, which is comparable to stadium lighting.	• Include light fixtures directed downward and away from property lines using full-cutoff, downward-facing fixtures • Avoid light spill and glare onto neighboring properties • Avoid excessive skyglow Lighting would be focused on safety and security, not illumination of building facades. Minimal light pollution would be generated. The USFWS lighting recommendations are to minimize blue light, uplight, and backlight and the chapter reference to the city's ordinance have been added to the Mitigation Plan in the Final AUAR. The lumen output identified in the photometric plan represents the total amount of light emitted by an individual fixture and should not be interpreted as the amount of light experienced off-site. Lumen output is only one characteristic of a lighting fixture. The resulting light levels at and beyond the property boundary are governed by numerous design factors including fixture shielding, optical distribution, mounting height, aiming angle, spacing, and the use of lighting controls. The photometric analysis evaluates the combined performance of the entire lighting system rather than individual fixture outputs. Although certain fixtures are capable of relatively high lumen output to safely illuminate large operational areas, they are full-cutoff, downward-directed fixtures specifically selected to minimize off-site light spill and glare. As demonstrated by the photometric plan, the campus has been designed so that predicted illumination at the property boundary remains at very low

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	levels, consistent with the proposed Project’s lighting performance objectives and City requirements.
Energy use The Draft AUAR reports that the data center is anticipated to consume between 2,233,800,000 and 4,467,600,000 kilowatt-hours (kWh) of electricity annually but does not provide the nameplate capacity of the facility. This provides an incomplete picture of the maximum amount of energy the facility may need, which directly influences the Project’s potential impacts on greenhouse gas (GHG) emissions, noise, and water use. The Final AUAR should include the total nameplate capacity of the facility at full buildout, as well as the total demand from each building, and a discussion of utilization rate assumptions, which are important for understanding the backup generation needs of the data center. It is not possible that these are unforeseeable parameters for a project of this size with a developer of this type. While additional regulatory action may be required for the energy-related components of the data center, this does not exempt the City from publicly disclosing the energy needs of the Project or analyzing potential rate impacts in this AUAR. The proposed Electric Service Agreement between Google and Minnesota Power, while its review by state regulators is ongoing, has not been finalized or approved by the Public Utilities Commission (PUC). This means that the assumptions in the Draft AUAR about how the facility will be powered and paid for may be incorrect, but they should nonetheless be stated clearly. The Draft AUAR also does not meaningfully address how the Project will mitigate rate impacts associated with increased energy demand from the Project, grid reliability, and backup generation needs for the Project. As the RGU, the City of Hermantown can evaluate and implement mitigation measures for each of these concerns. Affordability issues are a socio-economic impact of this	While the specific generation needs will be determined with final site design, the backup generation assumed to be the maximum scenario evaluated in the Final AUAR for air, noise, and GHG impacts assumes 16 x 2.75 megawatt (MW) diesel-fired emergency generators, or a total of 44 MW of backup generation. On March 26, 2026, Minnesota Power filed the Electric Service Agreement (ESA) with the Minnesota Public Utilities Commission (MPUC). The MPUC is currently reviewing the ESA through a public regulatory review process, which will include consideration of the demand of the proposed Project compared to Minnesota Power’s ability to provide power. The MPUC is expected to make a decision on the ESA in 2026 or early 2027⁶. See MPUC Docket Number 26-159, at https://www.edockets.state.mn.us/ for more information. There will be opportunities for public comment on the ESA, including comments on the impacts on utility rates, as part of the MPUC process. The ESA and materials provided through the MPUC process include detailed information on rate impacts, projected energy use and energy generation types, and compliance with Minnesota’s electricity laws. The MPUC authorized the Minnesota Department of Commerce to incur additional costs up to \$250,000 to engage specialized technical services to study impacts of the ESA. Rate impacts and

⁶ Minnesota Power. Available at:

<https://minnesotapower.blob.core.windows.net/content/Content/Documents/Company/PressReleases/2026/PressRelease03032026.pdf>

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project of high importance to Hermantown residents and all Minnesota Power ratepayers.	mitigation measures—if any are needed—are best considered through that process.
“New clean energy” and batteries Without knowing the nameplate capacity of the data center, it is also impossible to analyze whether the 300 megawatts (MW) of wind and 400 MW of battery storage resources “enabled” by the Project are sufficient to cover the energy needs of the facility. It seems very unlikely that only 300 MW of intermittent wind power could fully cover the needs of a hyperscale data center that consumes between 2,233,800,000 and 4,467,600,000 kWh of electricity annually. If the wind power associated with this Project will not cover its energy demand the Final AUAR must state so and discuss how the electricity needed will be generated. Overall, the lack of details about where the new resources might be installed and what assumptions are made about the capacity factor of the wind resource means the public cannot know whether the 300 MW of wind will address the increased energy demand from the Project, or whether fossil fuel generation will be used to power the Project. It is also important to recognize that battery storage is not an inherently “clean” resource—it can absorb and dispatch electricity from both clean and fossil fuel resources equally. If the battery storage proposed here is paired with fossil fuel energy resources, it will add to emissions, not reduce them. This is not a hypothetical impact: we have already seen data centers deploy large amounts of batteries with natural gas across the country. The Final AUAR must provide information about the nameplate capacity of the Project, the details about the location and timing of the 300 MW of wind power “enabled” by the Project, and whether the battery storage will be explicitly paired with renewable energy or fossil fuel resources. The Final AUAR must also honestly discuss the fossil fuel resources that will be used to fill any gaps in clean energy provisioned for the Project. Additionally, the Final AUAR should address whether the Project may lead to a delay in the retirement of fossil fuel facilities, such as Boswell Energy Center in Cohasset and the Hibbard plant in Duluth. In Reply Comments before the PUC about its	The Project Proposer will purchase all electricity needed for the Project from Minnesota Power. Minnesota Power filed the negotiated Electric Service Agreement (ESA) with the MPUC on March 26, 2026. The MPUC is currently reviewing the ESA through its public regulatory review process in MPUC Docket Number 26-159, available at https://www.edockets.state.mn.us/. There will be opportunities for public comment on the ESA, including comments on the impacts on utility rates. The ESA and materials provided through the MPUC process includes detailed information on rate impacts, projected energy use and energy generation types, GHG emissions, and compliance with Minnesota’s electricity laws. The Project Proposer acknowledges that battery energy storage systems are not inherently carbon-free, and the Project Proposer’s study of GHG emissions does not characterize battery storage as inherently carbon-free. As discussed in the GHG Analysis in Appendix H, Minnesota Power is subject to Minnesota’s carbon-free standard, and recognizes its obligation to achieve electricity generation or procurement equivalent to 100 percent carbon-free retail sales by 2040. BESS technology optimizes renewable energy resources by reducing grid volatility, increasing system resiliency, and helping to minimize carbon emissions by storing power during high generation periods and releasing that power to the grid during times of higher demand.

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Integrated Resource Plan (IRP), Minnesota Power describes the remaining Boswell units as “vital” for reliable service to its “energy-intensive customer base,” and suggests that the only way to meet this need is by converting Boswell’s remaining units to natural gas generation by 2030 and 2035. Specifically, Minnesota Power states that this continuation of fossil fuel usage at Boswell is based on “the need to replace nearly 1,000 MW of baseload generation and approximately 3 million MWh [megawatt-hours] of energy.” The three million MWh identified in those comments is, coincidentally, within the range of the Project’s estimated electricity consumption provided in the Draft AUAR. This warrants a closer look and full analysis in the Final AUAR	
Backup generation Backup generators are a potentially significant source of noise and air pollution near hyperscale data centers. It is therefore concerning that the Draft AUAR continues to try to pass the buck when it comes to analyzing these potential impacts by saying that the specific number of backup generators is “uncertain” and that “backup generation needs would be identified through a separate environmental review process outside of this AUAR.”⁹⁸ This AUAR process is the appropriate place to analyze potential air emissions and hazardous waste impacts of backup generators, not in subsequent permitting—which, as the Draft AUAR acknowledges, may not be triggered. An AUAR “must provide for a level of analysis comparable to that of an EIS for direct, indirect, and cumulative potential effects,” of the Project. To comply with these rules and Minnesota law, this AUAR must include a detailed analysis of the impacts of backup generation. The argument that the number and type of backup generators are not known at this time is not persuasive nor credible. In a discussion of potential noise impacts, the Draft AUAR implies that 16 backup generators would be “the worst-case” scenario. This seems to be based on an assumption in Appendix H that “up to 4 x 2.75 MW generators are assumed per building (up to 4 buildings total)” for backup generation.⁹⁹ The Draft AUAR and the Appendices do not indicate how or why they assume 16 backup generators would be the	Although not a required section of an AUAR, the Final AUAR has been updated with a qualitative air quality analysis in Item 17a that describes the type, sources, and compositions of possible emissions from stationary sources for an assumed maximum number of backup generators that could be used. While the specific generation needs will be determined with final site design, the backup generation assumed to be the maximum scenario evaluated in the Final AUAR for air, noise, and GHG impacts assumes 16 x 2.75 megawatt (MW) (44 MW total) diesel-fired emergency generators. As described in the AUAR, these emergency generators would only operate when the electric grid fails, or during testing which is estimated at 7 hours per year.

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maximum number possible for this Project. Recent reporting on the use of backup generation at data centers suggests that even this “worst-case scenario” is a vast underestimation of what might actually be put in place in Hermantown. In general, “large data centers can have hundreds of 2-4 MW diesel generators.” Because diesel generators are “typically the largest source of air pollution at a data center,” and emit on average two times more CO2 per unit of energy than the average grid mix, it is not appropriate for this AUAR to skip taking a closer look at the type, number, size, and potential impacts of backup generators for the specific facility that this Draft AUAR is analyzing. The Final AUAR must explain why and how it limited its noise and GHG emissions analysis for backup generation to only 16 generators, and likely must be supplemented with additional analysis of far more generators. More importantly, the Final AUAR must provide clear, detailed information about the type, number, and size of backup generation that the end user is considering and uses at their existing facilities. To say these things are unknown at this time—especially by the end user—seems disingenuous and impossible. In terms of mitigating the impacts of backup generation, the Final AUAR must also identify specific measures that will be taken and explain how those measures will be enforced. Currently, Appendix H offers ideas but not detailed plans for mitigation. This does not meet the standard required by Minnesota law for adequately addressing mitigation measures. The Final AUAR should look to the Better Data Center Project’s Diesel Generators and Data Centers report for specific mitigation measures and alternatives to diesel backup generators that should be considered, including battery energy storage systems (BESS), infrastructure upgrades to alleviate grid stress, reducing data center power needs (load shifting or reducing overall demand), requiring Tier 4 generators if diesel generators must be used, and restricting use to true emergencies and only required testing.	

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To the extent that this Project only requires a “worst case scenario” of 16 diesel generators with a combined generation capacity of 44 MW, the Final AUAR should clearly state this limit. It should also contain significantly more information and analysis about how the Project can operate with so little generation capacity, and any energy storage (i.e. batteries) planned for the site.	
GHG emissions The GHG emission estimates provided in the Draft AUAR appear to be unrealistically low, given what we know about Minnesota Power’s electricity mix now and for the next several years. This, combined with the lack of specificity in the Draft AUAR about GHG mitigation strategies, suggests that the City must go back to the drawing board before issuing the Final AUAR. The first assumption the Final AUAR should reconsider is the estimated emissions from HFC leakage. Table 19 in the Draft AUAR assumes only 81.72 tons of CO₂-equivalent will be emitted due to HFC leakage annually. There is no evidence offered to support this assumption, so it is impossible for the public to know whether this estimate is based in reality. It is also unclear whether alternative refrigerants, with a lower Global Warming Potential (GWP) were considered for this project and what the corresponding decrease in GHG emissions estimates might be. The Final AUAR should resolve these gaps. The Draft AUAR also states that the GHG emission assumptions in Table 19 for electricity use “account for the transition to renewable energy sources.” But it isn’t clear whether these estimates accurately reflect Minnesota Power’s current energy mix and its anticipated energy mix in the short term. It also fails to acknowledge that in its 2025 Integrated Resource Plan (IRP), Minnesota Power proposes adding as much as 1500 MW of new natural gas generation, which the company explicitly states is necessary to meet anticipated additional load growth, including for data centers such as this Project. The IRP also explains that Minnesota Power will maintain its coal-fired	The maximum-case assumed quantity of chillers for calculation purposes is 4,000 pounds per chiller, with 72 chillers in total. The MN EQB’s GHG calculator uses the following equation for HFC leakage from R-407C (which has a higher GWP than the refrigerant that the Project Proposer intends to use, which is R-1233zd E, but the tool does not have that as an option): 1.8 SF utilized area, at 0.3 kg HFC/1,000 ft² divided by 1,000 (unit conversion) x annual leak rate of 8.96% = 81.72 annual GHG emissions. The Project Proposer acknowledges that the required amount of refrigerant is high relative to other industrial uses. While the amount of refrigerant needed is high, the Global Warming Potential (GWP) is low due to the type of refrigerant that the Project Proposer intends to use (R-1233zd E)— see more here: (https://ww2.arb.ca.gov/resources/documents/high-gwp-refrigerants). To supplement the EQB’s tool, Appendix H includes a separate worksheet to show the GHG emissions and GWP of R-1233zd E, which is 20 metric tons lower emissions than what the EQB’s tool reports. The proposed Project’s electricity will be purchased entirely from Minnesota Power. Minnesota Power has filed the

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resources until the proposed new combined cycle gas plant generation is complete. Minnesota Power also proposes to replace its current coal units with gas-fired and gas/biomass-fired units, which will have their own GHG emissions to account for. These plans are part of the IRP’s “Long-Term Action Plan” for 2030-2039, which suggests that the Draft AUAR likely misstates the amount of total GHG emissions over the lifetime of the Project. The Final AUAR must address the likelihood that some or all of the additional electricity needed to power this data center will come from non-carbon-free resources like natural gas, biomass, or even coal, for the next 15 years and beyond. Included in the Draft AUAR and Appendix H (not Appendix G as stated in the text of the AUAR) is a list of mitigation strategies to address the anticipated GHG emissions from the Project. The list includes nonspecific things like planting trees and providing electric vehicle charging infrastructure. A small amount of tree planting or EV chargers will never be able to offset hundreds of megawatts worth of carbon pollution from biomass or fossil fuel electricity sources. It’s not clear whether any of the mitigation strategies will actually be implemented, or whether they were just included as vague concepts with no commitment to follow through. The Final AUAR should establish clear, detailed, and enforceable mitigation measures to reduce GHG emissions from the Project.	negotiated Electric Service Agreement (ESA) with the MPUC. The MPUC is currently reviewing the ESA through its public regulatory review process. The MPUC is expected to make a final decision in 2026 or early 2027. More information is available in MPUC Docket 26-159, which can be accessed via the MPUC’s website: https://www.edockets.state.mn.us/ The ESA and materials provided through the MPUC process includes detailed information on rate impacts, projected energy use and energy generation types, GHG emissions, and compliance with Minnesota’s electricity laws. In addition, the electricity generation sources for Minnesota Power’s electric system—and the associated GHG emissions—evolve over time and are governed by the Integrated Resource Planning (IRP) process with the MPUC. The IRP process is a public process. The most current IRP is available under MPUC Docket No. 25-127 at https://www.edockets.state.mn.us/. Because the electricity generation planning process is highly specialized and governed through an expert state agency, the MPUC, Minnesota’s guidance for environmental review directs responsible governmental units to use the state’s GHG emissions calculator, which includes electricity. The AUAR GHG calculation relies on estimates provided by the state’s calculator. The state’s calculator is an appropriate estimate for an AUAR. For stakeholders and members of the public that seek more detailed information, Minnesota Power’s Electric Service Agreement and Integrated Resource Planning processes at the MPUC provide the most comprehensive information. The IRP and ESA processes are

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	beyond the scope of this document and would be impractical to incorporate. The Final AUAR Mitigation Plan references the commitments to all the GHG mitigation items and the appendix letter has been corrected to reflect that the GHG mitigation is in Appendix H, and not Appendix G.
Historic properties The Draft AUAR misinterprets the conclusion of the In Situ Phase I Archeological Finding. The Draft AUAR suggests that this study recommended a “finding of No Historic Properties Affected was recommended for the Study Area.” However, the actual management recommendations for the Project, included in Appendix F, states that “[i]f the agencies concur with these findings and recommendations, and provided that the Inadvertent Discovery Plan is implemented and tribal consultation continues as appropriate, In Situ recommends a determination of No Further Archaeological Work for the Project.” As such, even if a finding of No Historic Properties Affected was recommended for the Study Area, the corresponding recommendation of No Further Archaeological Work for the Project was contingent on (1) agencies concurring with the findings of the report (2) continuing and completing tribal consultation and (3) implementation of the inadvertent discovery plan. However, Hermantown has failed to meaningfully implement any of In Situ’s recommended actions from its Phase I Archeological Study. Although the draft mitigation plan includes requirements for the developer to complete tribal consultation and implement an inadvertent discovery plan, there is little detail on how either of these will be implemented. The inadvertent discovery plan appears nowhere in the Draft AUAR or its appendices, and it’s unclear when (or if) the Project developer will be required to provide this plan to the public for review. Additionally, the Draft AUAR fails to comprehend or accurately state the level of tribal consultation required for this project. Nowhere in the Draft AUAR is it	MN State Historic Preservation Office (MnSHPO) provided a concurrence letter as part of the Draft AUAR comment period, based on a review of the Phase I Archaeological Survey (January 15, 2026) as prepared by In Situ Archaeological Consulting, stating that it agreed that archaeological site 21SL1302 is not eligible for listing in the National Register of Historic Places and that the proposed Project will not affect archaeological sites. Based on the information provided, MnSHPO also determined that there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by the proposed Project.

Comment	Response
evident that Hermantown has engaged in formal government-to-government consultations with interested Tribal Nations that could be impacted by this project. Although page 95 of the Draft AUAR provides a summary of tribal coordination completed during the AUAR process, all these so-called “consultations” have been between the Project proposer and tribal entities, not the actual city government of Hermantown. This is not true tribal consultation. There are no details or concrete commitments on how and when tribal consultations with the City must occur, and at which steps the Project developer must receive approval and informed consent from interested tribal governments. Additionally, the accelerated timeline for this project does not provide sufficient space for proper feedback and consultation with expert tribal staff. Therefore, given the discussion above, Commenters recommend that (1) tribal consultations are completed with all interested Tribes (and inter-tribal resource management organizations) prior to the preparation and publishing of a Final AUAR for public review; (2) the inadvertent discovery plan recommended by In Situ is completed and included in the Final AUAR for public review; (3) greater detail is provided in the mitigation plan on how, when, and with whom tribal consultations for this project will be completed. It is not sufficient to merely state that tribal consultations must continue without commitments to integrate Tribes’ viewpoints and knowledge into the environmental analysis. Free Prior and Informed Consent should be respected, including the right of tribal organizations approve or veto the measures included in the Final AUAR’s mitigation plan and the inadvertent discovery plan. Additionally, consultation must precede any permitting decisions and inform permit conditions.	
1854 Treaty As mentioned in Commenters’ Scoping Comments, this project implicates Tribal Nations’ interest and likely will harm treaty-protected resources within the 1854 Treaty of LaPointe’s covered territory. Nevertheless, the Draft AUAR does not acknowledge the 1854 Treaty. In the main body of the 142-page	The City and the Project Proposer acknowledge that the proposed Project is within the 1854 Treaty of LaPointe’s covered territory. This treaty preserved Tribes’ usufructuary rights— “[t]he privilege of hunting, fishing, and gathering the

Comment	Response
Draft AUAR, the 1854 Treaty is not mentioned a single time. In fact, in all of the hundreds of pages of Appendices attached to the AUAR, the Treaty is mentioned once, in a brief overview of St. Louis County's history in In Situ's Phase I archeological study. As previously mentioned, the only tribal consultations performed and recommended in the AUAR appear to be between the Project proposer or developer and interested tribal governments. However, this is not true government-to-government consultation in accordance with the U.S. Constitution, which must occur between governments. The Project developer is not a government and cannot implement a treaty on behalf of Hermantown (neither can the environmental review consultant selected by the City). As such, their coordination with any tribal entity is irrelevant to Hermantown's duty under federal law and norms to follow and uphold the 1854 treaty. Given that this treaty has the clear potential to implicate tribal resources protected under the 1854 Treaty, it is imperative that Hermantown connect with all interested tribal governments and intertribal organizations and adequately conduct the consultation required for this project. Specifically, Commenters recommend that Hermantown (1) engage in government-to government consultation with all Tribal Nations that are a party to the 1854 Treaty, their intertribal organizations (such as the 1854 Treaty Authority, who already submitted Scoping Comments in this matter), and all other interested tribal governments and inter-tribal resource management organizations; (2) perform consultations with interested tribal governments and inter-tribal organizations on all other topics of interest to them; (3) explicitly recognize and respect 1854 Treaty rights during the Final AUAR drafting process; (4) acknowledge and respect Free Prior and Informed Consent, including the right of tribal governments to approve or veto any component of the Project with the potential to impact treaty-protect resources; (5) meaningfully incorporate feedback from interested Tribal Nations and inter-tribal organizations into the environmental analysis and any permits being considered for this Project; and (6) provide more information on	wild rice, upon the lands, the rivers and the lakes included in the territory ceded" The Project Proposer is not aware of any granted access to private "fee simple deeded" lands to any Tribal members under 1854 Treaty Authority and Fond du Lac's conservation codes pertaining to Usufructuary Rights. The Project Proposer is committed to ongoing tribal engagement. The City acknowledges that the proposed Project is within the 1854 Treaty of LaPointe's covered territory and appreciates the request for government-to-government consultation on the Project. Independent of the environmental review process, the City will initiate outreach to engage in government-to-government consultation. The City is committed to this consultation continuing outside the AUAR review timeline. The Final AUAR Item 15 has also been updated to acknowledge the 1854 Treaty's role in this area.

Comment	Response
specific government-to-government consultation activities and engagement actions that will occur to ensure 1854 treaty rights are upheld.	
Local community impacts The Final AUAR must address the potential visual impacts of the Project on more than just aesthetics. As identified by Commenters in Scoping Comments, the analysis of visual impacts must include culturally significant sightlines, landscape-scale settings, and relationships to the sky and the horizon. Unfortunately, the Draft AUAR does not appear to have addressed this issue at all. In consultations with Tribes, Hermantown must assure that it understands this issue and incorporates it into environmental review and permitting. The Final AUAR must correct this deficiency, and change project plans consistent with all interested Tribes' input.	The Final AUAR has been updated to include visualizations of the Project Proposer in Item 16 Visual. The AUAR acknowledges there will be changes to the visual aesthetics of the landscape and the Project Proposer and City welcome continued coordination and consultation with Tribes that have expressed interest in, or have cultural affiliation with, the Study Area throughout the remainder of the project development to continue to address these concerns.
Cumulative impacts At least ten hyperscale data centers have been proposed in communities across our state over the last two years. Not all will come to fruition, of course, but several have detailed plans for development and have been in discussions with local planners for years. Given the scope of the proposed development, and the potential for these kinds of projects to attract more hyperscale data centers to the area, the Final AUAR should contemplate the cumulative impacts on water, energy, communities, and economies, of these other proposed developments. One hyperscale data center proposal in particular must be included in the AUAR: Cohasset. Cohasset city meeting minutes indicate that the city is considering a large AI data center, and that city representatives may have entered into nondisclosure agreements following an Economic Development Authority meeting in March of 2025. Given the proximity to Hermantown, and the fact that both data centers would receive their electricity from Minnesota Power, it is prudent to address whether a proposal is moving forward in	Cumulative potential effects are discussed in Item 22 of the AUAR. There are no additional known hyperscale data centers proposed within the environmentally relevant area, and therefore no other data centers are evaluated in this section.

Comment	Response
Cohasset, and how it might compound the potential impacts of the proposed Hermantown data center (i.e. the cumulative impacts of electricity demand and additional fossil fuel burning to serve that electric load). Importantly, the absence of an application for a data center in Cohasset, in light of meeting notes that suggest a nondisclosure agreement between the developer and the city may be in place, does not absolve Hermantown from its duty to consider the potential cumulative impacts of nearby development. Any information that Hermantown needs to fill out the details on this Cohasset proposal likely could be gathered from Minnesota Power, who regularly is approached by developers with proposals in an initial phase.	
Public infrastructure upgrades and costs The Draft AUAR fails to address the potential long-term costs of infrastructure to serve the Project for existing Hermantown residents. The Draft AUAR only contemplates the initial costs associated with upgrading the City’s existing water and sewer infrastructure to serve the Project. This is carefully described in the Draft AUAR to explicitly avoid any discussion of future costs for maintenance: “[there] will not be any public utility assessment levied against private property owners for the installation of the new utilities. Installation of the public utility improvements will be financed by the developer.” And although the developer will cover the installation costs of these improvements, it is clear from the Draft AUAR that the City will take ownership of those assets, along with their long-term management and maintenance costs. The Final AUAR must adequately assess the potential impacts to public infrastructure and public finances over the long term, especially after the lifetime of the Project. This analysis should include the costs of both maintenance and decommissioning and a discussion of long-term cost coverage or a decommissioning account, paid for by the end user, to mitigate this economic impact. Hermantown residents should not be left holding the	Long-term public finance planning, infrastructure maintenance funding, and infrastructure decommissioning cost allocation are municipal budget and capital planning matters governed by the City's financial policies; they are not environmental effects subject to review under Minn. R. 4410. The AUAR's scope is limited to identifying and mitigating the proposed Project's potential environmental impact. The City notes that general property tax levy is not used to pay utility maintenance. The City has water and sewer enterprise funds that capitalize reserves through utility charges. A preliminary analysis of the utility demand from the proposed Project shows the utility charges collected from the operational use of the facility will be greater than the cost of the maintenance over a 10 year period at minimum, as this City’s maintenance history shows nearly no maintenance on a utility less than 10 years old.

Comment	Response
bag for infrastructure that is only built to benefit the Project and associated facilities.	
Heat island In Scoping Comments, Commenters and others noted that the proposed data center could result in a significant heat islanding effect, due to the land use change from forest, wetlands, and peatlands to impervious surfaces. The Draft AUAR concludes that: “While there is some heat expelled, it is not anticipated that heat from the data center would cause heat island effect.” This is a bald-faced conclusion with no analysis. It is unclear what evidence supports this assumption. This is especially concerning given that the area surrounding the Project is zoned for Business and Light Manufacturing (BLM) uses and expected to change as the city develops. The Final AUAR should discuss the cumulative potential of such BLM development to create heat islanding effects by describing how much BLM development is expected or already planned nearby and identify mitigation strategies to reduce the risk of future heat island effects if more development occurs. Conversion of rural land to paved surfaces, along with a large new source of ambient heat, is likely to have significant temperature impacts that cannot merely be brushed off with a denial lacking any support. The Final AUAR must include clear support for this conclusion, or in the absence of such, offer concrete mitigation and enforcement plans. The Final AUAR should also be preceded by the heat study described in the draft mitigation plan and incorporate any mitigation measures identified therein as conditions of final project approval. The Draft AUAR’s utter failure to discuss how heat will be expelled from a closed-loop or air-cooled system further renders this “analysis” inadequate and in need of correction.	Urban heat island effects generally result from the replacement of vegetated land with buildings, pavement, and other impervious surfaces that absorb and re-radiate solar energy. Data centers also generate waste heat as a byproduct of computing operations, which is removed from the buildings through mechanical cooling systems and discharged to the atmosphere. The magnitude and extent of any localized warming from this project or another development are influenced by numerous site-specific factors, including facility size, cooling-system configuration, operating load, atmospheric stability, wind speed and direction, surrounding land cover, vegetation, and regional climate. The proposed Project is located within a relatively open landscape characterized by substantial setbacks, preserved and proposed vegetation, landscaped areas, and vegetated stormwater management features that promote airflow and reduce heat accumulation compared to densely urbanized settings. Northern Minnesota's cooler climate, seasonal variability, and prevailing meteorological conditions also differ substantially from the warmer urban environments. The design of the data center campus would maintain the natural topography where possible, would implement stormwater management ponds/systems, and would use equipment in highly specialized enclosures to mitigate any potential for minimal heat islanding effects offsite. Additionally, there are several climate adaptation measures that the Project Proposer would implement as part of construction and design standards for their data centers (see list included in Appendix H).

Comment	Response
Mitigation plan enforcement The Draft AUAR relies heavily on the assumption that any of the Project’s potential impacts will be mitigated and therefore, are not of concern. But the Draft AUAR fails to address how the proposed mitigation measures will be implemented and enforced in practice. Without a method to compel performance of identified mitigation measures, it cannot be assumed that the Project will not result in the stated impacts. Mitigation without enforcement is not mitigation. To comply with MEPA rules and avoid risk of legal challenge under MEPA and the Minnesota Environmental Rights Act (MERA), Hermantown should include in the Final AUAR a “description of how each mitigation measure will be implemented,” and should consider “legal and financial measures and institutional arrangements . . . that will be implemented to ensure mitigation.” This could include fines or permit revocation for noncompliance. Leaving this type of information out is not acceptable in view of the concerns of Hermantown residents about this process and its outcomes.	The mitigation plan in the Final AUAR presents the Project Proposer’s commitments, required mitigation as discussed in the AUAR, and applicable regulatory requirements. This combined approach of evaluating project-specific commitments, known mitigation measures evaluated in the AUAR, and their relationship to existing regulatory regimes describes how the mitigation plan will be applied and assurance that it will be applied. In response to significant public comments with concerns about the enforceability of the AUAR Mitigation Plan, the Final AUAR Mitigation Plan was updated to include the associated agency responsible for reviewing and enforcing the applicable mitigation item. The permitting matrix in Table 6 also describes which agencies are responsible for enforcing permitting and approval prior to project construction. Final government decisions on project permits and approvals cannot be granted unless the project elements are consistent with the assumptions made in the AUAR and complies with the plan for mitigation. Accordingly, the City cannot grant an SUP for the Project that fails to incorporate the mitigation elements. An SUP can be revoked for failure to comply with its conditions, so noncompliance could result in penalties up to permit revocation. Hermantown Ordinances Section 704. In addition, to ensure transparency, timely response to concerns, and awareness for future enforcement, a new mitigation item was added to require development of a complaint response plan that would begin during

Comment	Response
	construction and remain in place through operations. A complaint response plan would include a clear mechanism for area residents and businesses to report concerns that to both the City and Project Proposer for review and follow up action.
4. 1854 Treaty Authority	
The proposed data center is located within the 1854 Ceded Territory where treaty rights exist, and cumulative impacts to the cultural/natural resources of this ceded territory are of importance. We see no mention of ceded territory or treaty rights in the document. The City of Hermantown and appropriate regulatory agencies should communicate and offer to consult on a government-to-government basis with Bands who retain hunting and gathering rights within the 1854 Ceded Territory. Has that offer been made to the Bois Forte and Grand Portage bands?	The City acknowledges the request for government-to-government consultation on the Project. Independent of the environmental review process, the City will initiate outreach to engage in government-to-government consultation. The City is committed to this consultation continuing outside the AUAR review timeline. The Final AUAR Item 15 has also been updated to acknowledge the 1854 Treaty's role in this area.
The previous scoping document stated that the scale of the project meets the threshold of a mandatory Environmental Impact Statement (EIS), but the review process is still proceeding with the Alternative Urban Areawide Review (AUAR). We question if the AUAR is an appropriate tool to understand and evaluate the impacts of the proposed data center on local cultural/natural resources, and perhaps an EIS could be more suitable. The AUAR or EIS should clearly describe appropriate land use at the proposed project site. In the previous scoping document, the zoning of the area was unclear, and the study area was described as business and light industrial. However, currently the site is largely residential and agricultural, and from our understanding the zoning and land use were changed before the project information became publicly available. This re-zoning process and timeline should be made transparent for the public.	The AUAR recognizes that zoning is a regulatory tool used by local governments (cities, counties, and some townships) to guide specific land uses within specific geographic areas, and not necessarily a perfect reflection of existing land use conditions. The City of Hermantown 2045 Comprehensive Plan (adopted in April 2025) guides the land within the Study Area as Business and Light Manufacturing. In addition, an AUAR adopted in September 2025 evaluated light industrial land uses in the area. In 2025, about half of the land within the AUAR study area was zoned as Business and Light Manufacturing (the western half). A re-zoning from residential to Business and Light Manufacturing for the

Comment	Response
	remaining area was approved by City Council in September 2025. While the Study Area's current zoning is BLM and the City's Comprehensive Plan indicates that the Study Area is guided for Business and Light Manufacturing, the AUAR acknowledges that there are residential homes in the area that would see the transition of this land use over time. The Study Area and adjacent properties consist of a mix of industrial, transitional, and residential land uses. According to the City's existing land use map⁷, the majority of the Study Area land uses are currently vacant, utility, and single family residential (see Figure 10 in the AUAR). See also response in Public Comment response table with more information on the adequacy of an AUAR under the category "Request for Environmental Impact Statement."
Section 106 of the National Historic Preservation Act requires consultation for any actions that are a federal undertaking (ex. federal approval, permitting, funding). The current scoping document states that five new archaeological sites were identified within the project area. A future AUAR or EIS should provide detail as appropriate on all sites with an understanding of sensitivity of sharing specific information. Coordination with Tribal Historic Preservation Offices from Bands with treaty rights in the 1854 Ceded Territory should occur. Has communication occurred with the appropriate offices at the Bois Forte and Grand Portage bands?	The Project Proposer has continued to coordinate with tribal governments but has not received new responses as of July 2026.
The proposed project will likely have significant effects on infrastructure and resources including water use, sewer discharges, wetlands and water resources, electrical use and related air emissions, and connected electrical transmission actions. More specifics are needed on many of these topics.	The description of cooling technologies considered, the impacts and differences has been updated in the Final AUAR in Item 12 Water Resources to provide more clarity.

⁷ Source: https://hermantownmn.com/wp-content/uploads/2025/03/Hermantown-Comprehensive-Plan-Update_20250305_reduced.pdf

Comment	Response
Additional details on electric usage, effects to electric rates, and increased greenhouse gas emissions should be described. More details are also needed on the cooling method at the facility beyond what is stated in the current document. The language is not clear on this topic; it is hard to follow and understand; and it lacks specific plans and impacts. The document mentions a closed-loop or air-cooled system as options. Following paragraphs result in a confusing description by talking about dry-cooling, air-cooled, and closed-loop. Cooling is a major topic for this project, but not enough details are provided. If water-based, water sources and requirements along with discharges and water quality impacts need to be clearly defined. If utilizing air-based cooling, air generation sources and electrical use, including backup generator usage along with subsequent air and noise emissions, should be clearly identified and defined.	

PUBLIC COMMENTS

In addition to the comments received from public agencies, 192 comments were received from the public. The City has provided responses that address each of the themes in Table 2. A list of commenters and comment themes are included at the end of Table 2.

Table 2. Public Comments - Common Themes and Responses

Comment Theme	Summary	Response
Environmental Impacts	Climate Change: Comments raise concerns about greenhouse gas emissions and heat generation contributing to climate change beyond the project site. Comments suggest renewable energy should be used to align with Minnesota’s 2040 carbon-free generation goals. Comments mention that FEMA’s 100-year-old flood zones do not consider climate change. Urban Heat Island Effect: Commenters were concerned with the data center resulting in an urban heat island effect to nearby properties. Hazardous Waste: Comments raise concerns about properly storing hazardous materials for backup generator use. Comments ask for more information about e-waste disposal, specifically how electronics in the servers will be disposed of. Comments ask how the project proposes to dispose of or recycle GPUs.	Climate Change Response - The electricity for this project will be provided by Minnesota Power. Under Minn. Stat. § 216B.1691 (2g) (“Carbon Free Standard”), Minnesota Power is required to provide 80% carbon free electricity by 2030, 90% by 2035, and 100% by 2040 to all of their retail customers. To support progress towards meeting Minnesota’s Carbon-Free Standard and strengthen the resilience of the electrical system for all Minnesota Power customers, this Project would enable the development of 700 MW of new clean energy resources, including 300 MW of wind energy and 400 MW of battery storage, without increasing costs to Minnesota Power customers. While energy storage has no direct emissions effect, when deployed strategically, energy storage can make the grid more flexible, unlocking renewable energy and reducing GHG emissions. Minnesota Power’s proposed additions of energy storage is important to ensure the utility has sufficient capacity to serve all customers at all hours of the year. This provides a significant contribution to both Minnesota Power’s goal to get to 100% renewable energy by 2050 as well as the state’s (Minnesota) Next Generation Energy Act, which requires the state to reduce greenhouse gas emissions in the state by 80 percent between 2005 and 2050. - The AUAR’s GHG analysis was prepared using the Minnesota Climate Calculator (Version 1.2, March 2026), developed for the Minnesota Environmental Quality Board (EQB). Consistent with Minnesota

Comment Theme	Summary	Response
	Air Quality: Comments raise concerns about air pollution from generators, monitoring standards, and potential public health impacts and if they will be compliant with the City’s special use permit. Commenters requested a refined, MPCA-consistent Air Emissions Risk Analysis specifically addressing PM2.5, PM10, nitrogen dioxide, carbon monoxide, diesel particulate matter, volatile organic compounds, and both acute and chronic noncancer health hazards from backup generator operation. Commenters asked for more information on construction dust. Light Conditions: Comments express concern about nighttime lighting effects on residents and wildlife sleep cycles, as well as light pollution, and would like to see these issues addressed in a study. Commenters requested more information on the impacts lighting may have on migratory species and other wildlife. Comments suggested a comprehensive lighting analysis, measurable and enforceable lighting standards, alignment with the cited USFWS guidance, an ecological-impact	environmental review guidance, the calculator estimates project GHG emissions over the expected life of a project and incorporates utility-specific electricity emission factors that change over time. The methodology, assumptions, and results are documented within the calculator and in Appendix H. See additional explanation as to why the EQB’s calculator was selected at the end of this comment response attachment. • Additionally, there are several climate adaptation measures that the Project Proposer would implement as part of construction and design standards for their data centers (see list included in Appendix H). • The proposed stormwater plans take into account extreme rainfall and flooding events in future conditions and proposed basins are sized appropriately to handle those conditions if they occur per City of Hermantown’s municipal code for stormwater requirements outlined in 1080.08.04.04. The requirement states that development “calculations and any other information used in evaluating the 100-year, 24-hour storm event must be sufficient to demonstrate that no damage will occur to adjacent downstream properties.” Urban Heat Island Effect Response • Urban heat island effects generally result from the replacement of vegetated land with buildings, pavement, and other impervious surfaces that absorb and re-radiate solar energy. Data centers also generate waste heat as a byproduct of computing operations, which is removed from the buildings through mechanical cooling systems and discharged to the atmosphere. The magnitude and extent of any localized warming from this project or another development are influenced by numerous site-specific factors, including facility size, cooling-system configuration, operating load, atmospheric stability, wind speed and direction, surrounding land cover, vegetation, and regional climate. The Proposed Project is located within a relatively open landscape characterized by substantial setbacks, preserved and proposed vegetation, landscaped areas, and vegetated

Comment Theme	Summary	Response
	evaluation of artificial light at night, construction-phase lighting standards, and post-installation compliance verification. Comments also requested an evaluation of off-site glare, light trespass, skyglow, and regional cumulative skyglow, noting the Project's proximity to a dark-sky area. Comments requested that the AUAR include measurable illumination limits, property-line illumination limits, vegetative screening, restrictions on construction lighting, species-specific mitigation, and lighting with 2700K corrected color temperature. Utilities and Infrastructure: Comments seek additional analysis of impacts to existing energy infrastructure and details on proposed utility extensions. Some comments express support for the sewer / water system extensions. Commenters requested information regarding what entity will finance maintenance on the extended infrastructure. Comments questioned whether the infrastructure extension is considered as a connected action or a cumulative potential effect. Comments asked about impacts to local roads from construction traffic.	stormwater management features that promote airflow and reduce heat accumulation compared to densely urbanized settings. Northern Minnesota's cooler climate, seasonal variability, and prevailing meteorological conditions also differ substantially from the warmer urban environments. The design of the data center campus would maintain the natural topography where possible, would implement stormwater management ponds/systems, and would use equipment in highly specialized enclosures to mitigate any potential for minimal heat islanding effects offsite. Hazardous Waste Response ● If fuel storage for backup generators are needed and are stored on site, the storage tanks are subject to US Environmental Protection Agency regulations and enforced by the Minnesota Pollution Control Agency (MPCA). The Project Proposer would be required to comply with the following spill prevention requirements: ● Proper tank maintenance, including regular monitoring for leaks and corrosion ● Prevention of water from entering tanks ● Ensuring proper labeling of storage tank for product type and capacity to avoid unloading errors and contamination ● E-waste, including data center graphics processing units (GPUs), would be to be reused, remarketed, or recycled, ensuring that no e-waste goes to landfills. More information about Google's Circularity program can be found at https://datacenters.google/circularity. Air Quality Response ● Although not a required section of an AUAR, the Final AUAR has been updated with a qualitative air quality analysis in Item 17a that describes the type, sources, and compositions of possible emissions from stationary

Comment Theme	Summary	Response
		sources for an assumed maximum number of backup generators that could be used. • The design and use of any proposed backup generators would be required to meet the City's special use permit requirements and to comply with any applicable air permits. Light Conditions Response • The lighting design for the data center campus would utilize down-lighting, fully shielded cut-off fixtures, and would fully comply with the City's lighting ordinance to prevent any light pollution. Specifically, the lighting plan for the data center campus has been designed to: • Use light fixtures that are directed downward and away from property lines using full-cutoff, downward-facing fixtures • Avoid light spill and glare onto neighboring properties • Avoid excessive skyglow • Lighting would be focused on safety and security, not illumination of building facades, so minimal light pollution would be generated. • The Final AUAR has been updated with visualizations of the project to show how the mitigation would be applied through walls, downlighting, berms and landscaping to avoid any lighting impact. • The USFWS lighting recommendations and reference to the City's Ordinance have been added to the Mitigation Plan in the Final AUAR. Utilities and Infrastructure Response • Future power needs are being coordinated with the current power provider (Minnesota Power). Minnesota Power has completed a System Impact Study on the existing grid network to understand the existing capacity and future infrastructure needs to provide sufficient capacity for the proposed data center while maintaining the grid system for the surrounding area. After that step, a Facilities Study was completed to understand what improvements would be needed. Through an Electric

Comment Theme	Summary	Response
		Service Agreement between the Project Proposer and Minnesota Power, and consistent with state law⁸, the Project Proposer would cover the costs associated with the necessary energy infrastructure to meet its energy needs. See Item 22 in the AUAR for more information. • The following utility extensions are documented in the Final AUAR that would be needed to support the project: • Approximately 12 miles of new looped 8-12" watermain to connect the site to municipal utilities. See item 12 for more information. • Wastewater conveyance infrastructure (lift stations, force main, and gravity sewer) would be installed and connected to the existing sanitary sewer located near Arrowhead Road and Lindahl Road. See item 12 for more information. • New transmission lines would be built from the existing Arrowhead Substation and additional transmissions lines would be needed from a new transformer at the existing St. Louis County Substation (half mile northwest of the Study Area). See Item 22 for more information. • The explicit municipal purpose of the proposed utility extensions is to support development generally within the area identified for municipal service in the City's adopted 2045 Comprehensive Plan. The expansion of the Urban Services Boundary was on an independent planning trajectory from the proposed Project. Further, a project that is a prerequisite for another is a connected action only where the prerequisite project is not justified by itself. While the utility extension is a prerequisite for the data center, the utility extension is justified by itself. Therefore, the utility extensions do not meet the definition of connected action Under Minn. R. 4410.0200, subp. 9c. • There will not be any public utility assessment levied against private property owners for the installation of the new utilities. Though the Project Proposer is one funding source for an already-contemplated project, with the potential for multiple beneficiaries of the resulting

⁸ Minnesota Statutes Chapter 216B

Comment Theme	Summary	Response
		infrastructure. Public infrastructure routinely gets built with funding sources that are themselves dependent on private development, but funding relationships do not themselves convert the public infrastructure into a connected action. • Long-term public finance planning, infrastructure maintenance funding, and infrastructure decommissioning cost allocation are municipal budget and capital planning matters governed by the City's financial policies; they are not environmental effects subject to review under Minn. R. 4410. The AUAR's scope is limited to identifying and mitigating the proposed Project's potential environmental impact. The City notes that general property tax levy is not used to pay utility maintenance. The City has water and sewer enterprise funds that capitalize reserves through utility charges. A preliminary analysis of the utility demand from the proposed Project shows the utility charges collected from the operational use of the facility will be greater than the cost of the maintenance over a 10 year period at minimum, as this City's maintenance history shows nearly no maintenance on a utility less than 10 years old. • As part of the City's utility extension work, new roadway improvements on Morris Thomas and Midway Road are being designed and built prior to campus construction and would be able to support construction traffic loads.
Water Resources and Wildlife	Water Supply, Use, Groundwater, and Protection: Comments express concern about water demand, long-term water availability, groundwater and surface water impacts, drought resilience, and mitigation measures to protect groundwater, surface water, and private wells, especially if cooling methods change to use water. Comment requested a project proposer-funded private well	Water Supply, Use, Groundwater, and Protection Response • The Project Proposer and City of Hermantown acknowledge the importance of water resources to the community and to the region. • While the cooling technology has not been decided yet, both options (a dry cooled or air-cooled system) that are being considered do not rely on groundwater extraction for any water used and therefore would not affect groundwater supply. Additionally, the stormwater plans would incorporate recharge preserving stormwater practices, which is consistent with MDNR groundwater sustainability principles and MPCA water quality protection objectives.

Comment Theme	Summary	Response
	protection program before the projects starts. Water Quality and Contamination: Comments express concern about chemicals associated with cooling systems and other operations contaminating or heating surface water and groundwater and impacts to trout streams nearby, with several comments requesting transparency on the disposal of closed loop chemicals. Commenters request clarification on wastewater handling from the closed-loop cooling system. Commenters requested disclosure of the specific filtration and treatment protocols for PFAS and heavy metals in cooling system wastewater, an independent hydrogeological study mapping local aquifers and groundwater flow directions, and a contingency plan addressing spills, leaks, or flooding involving the cooling system. Comments request a pre-construction water impact assessment and ongoing well and surface water monitoring and testing. Comments request financial assurances related to water impacts including an escrow account for affected landowners. Comments suggest that the MPCA's Midway River Watershed Protection Study be	- Water demand for the proposed Project would be supplied from the City of Hermantown. The water demand outlined in Table 16 of the Final AUAR remains a conservative upper-bound estimate, inclusive of ongoing operational/domestic water usage (i.e. showers, laundry, kitchen / food preparation, landscaping, fire protection) as well as a temporary, one-time water demand associated with initial commissioning activities, including (if used) filling of the closed-loop cooling system. The Project Proposer has coordinated with the City of Hermantown to ensure this proposed water use is in alignment with current water supply capacity. - Proposed development must be limited to the water use volumes studied in the AUAR. If plans change and additional water appropriations are needed, an AUAR update would be required prior to any final building and site plan approvals from the City. - Related to groundwater monitoring, the Project Proposer has committed to the following in the Final AUAR Mitigation Plan: - Complete a pre-construction survey of groundwater elevations. The Project Proposer must report on the status of this survey to the City prior to construction. - Monitor the groundwater table elevation from on-site wells for the duration of construction. The Project Proposer must report on the status of this monitoring to the City during construction. - Monitor surface water quality from MDNR Public Watercourse S-002-010-003.4-001 located in the SE corner of the Study Area before and during construction. Water Quality and Contamination Response - The Final AUAR has been updated to describe the composition of the wastewater from a closed-loop water cooling system. No additives utilized in the system would contain PFAS (per- and polyfluoroalkyl substances). All additives would be managed, stored, and applied in strict accordance with their respective Safety Data Sheets (SDSs) and applicable federal, state,

Comment Theme	Summary	Response
	incorporated into the AUAR. Comments wanted to know how road salt would be managed to prevent pollution. Wetlands Impact: Comments request detailed evaluation of wetland impacts. There is a concern that removal of wetlands and trees and disruption to the groundwater could lead to flooding, erosion, or runoff. One commenter requested that the developer be required to plant 10,000 tree seedlings in an appropriate area, as compensation. Comments express concern that the scale of impacts are noncompliant with the St. Louis River comprehensive Watershed Management Plan and suggests that the U.S. Army Corps of Engineers should complete their review of the wetlands as mitigation plans are finalized. Comments raised concern around GHG emissions increasing due to wetland removal. Wildlife: Comments identify concerns about impacts to wildlife, wildlife habitat, and tree removal. Some commenters raise concerns about the rare mussels and trout found in the Midway River. Some commenters noted the potential change in water	and local environmental regulations. The City of Hermantown enforces chemical and hazardous material storage through the adopted Minnesota State Fire Code and local land use regulations. Within a closed-loop system, environmental exposure is minimized through controlled maintenance events. ● The makeup of the wastewater associated with the commissioning process would be coordinated with Western Lake Superior Sanitary District (WLSSD) to determine if it is acceptable for sanitary sewer discharge or whether it is required to be hauled off-site or otherwise managed separately in accordance with state and federal regulations. ● The Project Proposer must monitor the groundwater table elevation for the duration of construction. The Project Proposer must report the status of this monitoring to the City during construction. ● The MPCA NPDES Construction Stormwater Permit outlines requirements that any development must follow for discharge to trout streams. The proposed permanent stormwater treatment system must minimize any increase in the temperature of trout streams resulting from the one- and two-year, 24-hour precipitation events. This includes all tributaries of designated trout streams located within the same Public Land Survey System section. Permittees (Project Proposer) must incorporate one or more of the following measures, in order of MPCA preference: ○ Provide stormwater infiltration or other volume reduction practices. ○ Filtration systems must discharge all stormwater routed to the system within 24 hours. ○ Minimize the discharge from connected impervious surfaces by discharging to vegetated areas, or grass swales, and using other non-structural controls. ○ If ponding is used, the design must include an appropriate combination of measures such as shading, vegetated swale discharge or constructed wetland treatment cells that limit

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	temperature affecting trout streams, that there are protected migratory birds in the area under the Migratory Bird Treaty Act, asks how their health will be ensured, and suggests an EIS be used to study this. Comments request a native plant maintenance plan. Comments stated the current AUAR does not evaluate artificial light as an environmental stressor for wildlife. Comments suggest there should be a field survey for endangered species. Comments ask if the US Fish and Wildlife Services has been contacted regarding endangered species in the area.	temperature increases. The pond must be designed as a dry pond and should drawdown in 24 hours or less. Additionally, outlet controls would be designed to draw from the bottom of the pond. ○ Other methods that minimize any increase in the temperature of the trout streams. ● The MPCA’s Midway River Watershed Protection Study and the St. Louis River Comprehensive Watershed Management Plan are referenced in the AUAR, and the ongoing spring study verification also references the studies’ findings. ● To reduce chloride runoff, the proposed Project would focus on source reduction, deicer and salt storage BMPs, and smart salting techniques. All winter maintenance individuals or contractors for the development must be MPCA Smart Salting Level 1 Certified. Winter maintenance individuals must be responsible for the application of appropriate deicing material at the proper amount and rate; the employment of correct procedures for temperature and conditions; accurate record-keeping and data recordation; and calibration of equipment. If deicer or salt is stored onsite, the storage areas must be covered or indoors and located on impervious surfaces. Wetland Impact Response ● The anticipated maximum development impact for wetland impacts has been identified in the AUAR (as shown on Figure 22). The Project Proposer’s intent is to minimize wetland impacts to the extent practicable through further site design refinement. Specific wetland mitigation will be determined as part of the currently ongoing process under the WCA. The Project Proposer will be required to comply with all federal, state, and local wetland requirements including avoiding and minimizing impacts to

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		the extent practicable and mitigating any wetland impacts that are unavoidable. • New stormwater ponds would be constructed as part of the site design and would offset the increase in impervious surface and wetland impacts needed to meet the project purpose and need, as well as standards established by the Minnesota Pollution Control Agency for stormwater management. The proposed stormwater management system is specifically designed to mitigate potential impacts and preserve the existing hydrologic regime of nearby wetlands through controlled release rates and peak water level management. • The project received an Approved Jurisdictional Determination from the U.S. Army Corps of Engineers in June 2026 for majority of the Study Area, ruling Wetlands 2 through 20 and 22 through 29, and Streams ES-2 through ES-7 non-jurisdictional. • Tree replacement would be conducted as required by the city. Wildlife Response • The Project Proposer has coordinated with the Minnesota Department of Natural Resources (MDNR) on this project to understand the potential for wildlife and protected species impacts and associated mitigation to avoid impact. The Project Proposer will comply with the MDNR's recommendation for tree removal restrictions to avoid potential impacts to some migratory bird species and the Northern-long eared bat, avoid site lighting with blue light, uplight, and backlight, and reseed disturbed grasslands with native and pollinator friendly seed mix to avoid impacts to the monarch butterfly and Suckley's cuckoo bumble bee. The Project Proposer must follow all applicable ordinances, rules, and regulations that apply to wildlife, and mitigating impacts to wildlife, and most wildlife mitigation will occur under existing regulations.

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		• The Project Proposer would also implement stringent erosion and sediment control measures as part of the stormwater management plans to limit potential negative impacts to rare mussels and trout in the Midway River. • U.S. Fish and Wildlife Service’s IPaC database was reviewed for potential for endangered or threatened species within the Study Area. See Final AUAR Item 14 for more information. • While birds are highly mobile and individual birds may utilize habitats both within and outside the AUAR Study Area, the proposed Project is not located within a designated IBA, migratory concentration area, wildlife refuge, or other high-value avian habitat. The project would also not directly alter or disturb the identified regional birding areas such as Sax-Zim Bog, Hawk Ridge, and the St. Louis River Estuary. Although the project would result in the removal of forested habitat within the Study Area, these impacts are expected to be localized and there is extensive forested habitat remaining in the surrounding area. It is also noted that this area occurs within municipal boundaries and is zoned for industrial development, which is consistent with the proposed Project.
Noise Impacts	Operational Noise: Comments raise concerns about continuous operational noise from equipment. Specifically, potential effects on nearby residences, human health effects such as sleep interruption, and wildlife health. Multiple commenters raised concerns about low frequency noise, including requesting a moratorium on approval until Minnesota establishes low-frequency noise (LFN) and infrasound standards; specific monitoring protocols, including dBA, dBC, and unweighted	Operational Noise Response • Operational noise from any development project, including this one, is required to abide by the applicable Minnesota Statutes and Rules (Minn. R. 7030.0040) and City of Hermantown Ordinances. In Minnesota, environmental noise is regulated under Minnesota Rules Chapter 7030, which establishes enforceable environmental noise standards adopted by the City of Hermantown. • Operational noise for the proposed Project has been modeled and evaluated for compliance with the applicable Minnesota noise standards. Noise mitigation must be employed to bring Project-related noise levels into compliance with state standards. The following mitigation measures may be included in the final design to ensure compliance with state noise standards:

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	dBZ measurements, one-third-octave-band and narrow-band analysis; and multi-season/day-night monitoring at homes and in adjoining townships. Comments requested a literature review of comparable closed-loop data centers for documented community and health effects. Comments additionally requested that a buyout be offered for properties within 2.5 miles of the Project due to operational noise concerns. Comments additionally requested a post construction tonal analysis to identify and correct specific noise spikes, and more information on the pitch of the operational noise. Construction Noise: Commenters provided concerns about construction-related noise noting the length of a 5-year construction period. Comments also raised concerns about dust during construction.	○ Comprehensive chiller enclosures, including compressor covers, fan discharge stacks with integrated metal silencers, and intake silencers ○ Operational controls ○ Noise walls ○ Landscaping (earth berms) ○ If the Project Proposer includes backup generators, the Project Proposer may only complete backup generation testing activities between 8:00 am and 5:00 pm, Monday – Friday. Additional noise modeling must be completed prior to issuance of a building permit to demonstrate that the Project-related nighttime L50 noise levels would comply with the Minnesota State Noise Standard and City of Hermantown Ordinances. ● In addition, noise control equipment that controls audible noise also controls low frequency noise and infrasound. An explanation of both are included in the Final AUAR. ● The Final AUAR evaluates and acknowledges that mechanical equipment associated with data centers can generate some low-frequency sound. The inclusion of this discussion is intended to provide additional context and does not indicate the presence of a previously unidentified environmental impact. Environmental review evaluates projects using the applicable regulatory framework. In Minnesota, environmental noise is regulated under Minnesota Rules Chapter 7030, which establishes enforceable environmental noise standards adopted by the City of Hermantown. Neither Minnesota nor the City has separate environmental noise standards specifically for low-frequency sound. The absence of a separate regulatory standard does not preclude completion of environmental review. Environmental review routinely evaluates environmental topics using the applicable standards, available technical information, engineering analysis, and professional judgment.

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		- The Final AUAR Mitigation Plan has been updated to include a complaint reporting process during construction and operations to provide an avenue for reporting concerns directly to the Project Proposer and City, and for timely resolution of complaints. Construction Noise Response - The Project Proposer must comply with the city noise ordinances that are in place for when construction occurs. The City of Hermantown regulates the hours of operation for construction equipment through development agreements and typically limits construction activities from 10 p.m. to 7 a.m. Additional limitations to construction activity hours could be considered in a Special Use Permit. - The Final AUAR has also been updated to explain what types of constructed related activities and noise could be expected. See the AUAR Item 17 for more information on dust mitigation during construction.
Environmental Review Process	Request for an Environmental Impact Statement: Many comments question the adequacy of the AUAR and request preparation of a full EIS based on project scale, uncertainty, resource use and potential cumulative impacts that should be fully disclosed to the public. Lack of Project Clarity: A comment notes that the AUAR doesn't fully describe the scale or scope of the project as a hyperscale data center and another commenter is concerned about the structure of the environmental review itself and whether the community should	Request for Environmental Impact Statement Response - The City of Hermantown and the Project Proposer are voluntarily preparing an updated AUAR to provide the public with additional opportunities to comment on newly available project details on a reduced Study Area and to provide the City of Hermantown with additional analysis about environmental impacts from the proposed project. - An AUAR is an appropriate process for environmental review because under Minn. R. 4410.3610, subp. 1: "A local unit of government may use the procedures of this part . . . to review anticipated . . . light industrial development and associated infrastructure in a particular geographic area within its jurisdiction" The proposed development scenario meets the State's mandatory requirements for an environmental review process based on Minnesota Rules 4410.4400. Minnesota Rule 4410.3610 allows for an alternative form of review through an AUAR for qualifying projects, including this scenario.

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	absorb the impact. Some comment why it's considered light industrial when it is a hyperscale data center. Some comments raise concern around the City not knowing how many generators will be used. Desire for Additional Evaluation: Comments suggest more research and public education on AI and data centers. One comment asked that the DNR's issues have been addressed in the AUAR (public water, rare mussels and watchlist species, missing permits, and chloride). Multiple comments suggested that the updated AUAR should address electro-magnetic field radiation, noting health concerns; one comment related to studying alternative sites; and several comments share general concern about level of detail in topics evaluated. Comments requested an environmental review of all surrounding land areas. Comments request that the full campus, all phases and all functionally connected infrastructure have been evaluated, and the impacts on surrounding townships receive equal consideration. Comments asked for project comparisons with the original comprehensive plans. Comments	• Like an environmental impact statement, this AUAR includes cumulative potential effects review as well as a mitigation plan that must be followed. • An AUAR is a study document which provides an evaluation of the environmental impacts of future development, and the opportunity to manage and mitigate those impacts. The information and comments from an AUAR process assist communities as they contemplate local planning and zoning decisions. • To ensure compliance and accuracy, future development like this project must align with the AUAR's assumptions; otherwise, the AUAR must be updated. Additionally, the AUAR must be reviewed and updated every five years until all development within the Study Area is complete. • The City of Hermantown is the governmental unit with the most approval authority over the project as a whole (see full permit list in Table 6 of Item 9 - Permits and Approvals Required in the Final AUAR) and therefore is the RGU for this project. Lack of Project Clarity Response • The project description section of the Final AUAR and subsequent sections are based on the evaluation of up to 1.8 million square foot data center building campus (defined as Communication Services in the Hermantown zoning code). The proposed data center falls within the definition of light industrial use for the purpose of environmental review. See Minn. R. 4410.0200, subp. 42a. • The City and Project Proposer have followed Minnesota Rules and EQB guidance for public notice and comment period requirements for this AUAR. The City and the Project Proposer are committed to continuing to follow all applicable notice and comment requirements. • While the specific generation needs will be determined with final site design, the backup generation assumed to be the maximum scenario evaluated in the Final AUAR for air, noise, and GHG impacts assumes 16 x 2.75 megawatt (MW) diesel-fired emergency generators (a total of 44 MW

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	requested more information on zoning specifically the shoreland overlay district. Study Area and Scope: Comments express concern that the defined study area may limit analysis of regional and cumulative impacts, including impacts across jurisdictional boundaries. Some commenters request evaluation of broader regional development effects.	of backup generators). More information related to air quality analysis has also been updated in the Final AUAR in Item 17. Desire for Additional Evaluation Response • The Project Proposer has more information available on AI and data centers here: hermantowndatacenter.com and https://datacenters.google/. The Project Proposer invited all Hermantown residents and held an Open House in Hermantown on Wednesday, June 24th, and estimates that 496 people attended to learn more about the project. The Project Proposer intends to conduct additional community engagement opportunities later this year to share more about the project as the site planning advances. • The project team has been meeting and coordinating with the MDNR throughout the AUAR process to address their concerns. The topics mentioned in the comment letter are addressed in the Final AUAR: public waters (Item 22), rare mussels and watchlist species (Item 14), chloride use (Item 22), and EIS trigger (Item 4). • More information on potential electro-magnetic field radiation from the project and associated transmission lines has been added to the Final AUAR in Item 22. • Regarding alternative sites, the Project Proposer uses a rigorous process to select sites, which includes factors like proximity to customers and users, local talent, land, and availability of (or potential to bring new) carbon-free energy. Minnesota's commitment to clean energy and availability of clean energy resources from Minnesota Power has made this an attractive site for development of a data center for the Project Proposer. • More detail on how the process works for a closed-loop cooling system as well as the additives that could be used has been added to the Final AUAR in Item 22.b.i. • Surrounding land uses are evaluated in AUAR Items 10, 16, and 19.

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		• A development scenario to study a past Comprehensive Plan was not suggested during the Scoping comment period and therefore was not evaluated in the AUAR. • As of August 2026, there are no other special districts or zoning overlays within the AUAR Study Area. Study Area and Scope Response • The analysis in the AUAR evaluates project related impacts within the AUAR Study Area boundary and also provides a cumulative potential effects review that looks at the effect on the environment that results from the incremental effects of this project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned and would evaluate impacts to those resources outside of the AUAR Study Area. • Many of the AUAR topics do evaluate adjacent property impacts such as noise, traffic, lighting, and water resources.
Land Use	Long-Term Conditions and Decommissioning Considerations: Comments raise questions about what would happen if the facility became obsolete in an expected term of 10-15 years or wants to expand in the future. Comments also suggest Google should set aside a bond or provide a plan in the case that the data center is unsuccessful or abandoned. Comments asked about how water will be treated if the facility is decommissioned.	Long-Term Conditions and Decommissioning Considerations Response • The City understands concerns about what may happen to a data center facility at the end of its operational life. Based on information available for this project and industry experience, the assumption that the facility would have a useful life of only 10–15 years does not fully reflect how modern data centers are typically developed, operated, maintained, and updated over time. While individual pieces of technology within a data center, such as servers, computing equipment, or cooling equipment, are, or may be, periodically replaced or upgraded, the buildings themselves are generally designed for much longer use. The structural life of a modern data center building is commonly 30 years or more, with computing equipment being refreshed multiple times over the life of the facility.

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		• Data centers also represent a substantial long-term capital investment, often involving hundreds of millions of dollars in buildings, utility infrastructure, fiber-optic networking, and site improvements. This infrastructure is anticipated to be repurposed, rather than decommissioned, should the data center cease operations at some point in the future. • Decommissioning impacts were not evaluated in this AUAR. If a data center were decommissioned, a city's responsibilities would depend on local ordinances, development agreements, utility ownership, and environmental regulations at that time.
Transparency	Comments express concern and frustration about the city's honesty after secrecy, the use of non-disclosure agreements, project clarity, limited publicly available information and the timing and transparency of public notice with delayed release of project details, AUAR reports dated in January, two months before the scoping commenting period. Concern that there is a lack of information and that all information should be made publicly available such as all environmental studies, infrastructure analysis, and economic impact assessments. Concern that the city is not fully aware of project details. Comments asked for public access to raw data, third-party technical review, and all agency comments to be published before adopting the AUAR.	Transparency Response • To provide the public more specifics and clarity on the project– the City of Hermantown and Harmony Group LLC are voluntarily completing this updated AUAR to allow the community more time to review and comment on the project. • Comments compiled from this Draft AUAR comment period have been retained and responded to in the official record as part of the Final AUAR process. • The Project Proposer held a public Open House on Wednesday, June 24, 2026, and an estimated 496 people attended. • The Project Proposer also intends to continue community engagement opportunities even after the AUAR process is complete to share more about the project as the site planning advances. • Some studies were completed ahead of the AUAR scoping comment period to prepare for this AUAR update for topics that were standard as part of the EQB's form requirements. All studies completed as part of this project have been shared on the city's website at: https://hermantownmn.com/project/ • The City has been involved in the AUAR process and has reviewed all materials supplied by the Project Proposer by subject matter experts and external consultants to ensure adequacy and completeness.

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		Braun Intertec has been hired by the City to act as a third party reviewer of the AUAR on the City's behalf.
Public Engagement and Process Concerns	Public Engagement: Comments ask why the council didn't ask community members if this project was wanted and mention that the city is going through the motions at public meetings and the voice of constituents does not matter. Some comments suggest that this should be decided by a populous vote. Comment Process Concerns: Residents along with Minnesota Center for Environmental Advocacy (MCEA) and Stop the Hermantown Data Center (SHDC) requested a 30-day comment period extension to give residents time to process the amount and complexity of information provided in the AUAR, noting that there were additional appendices yet to be published. Commenters requested a more thorough complaint process for people to submit comments	Public Engagement Response - The City of Hermantown, as the Responsible Governmental Unit (RGU) for the AUAR process, will carefully consider all comments received throughout this process prior to any project-related approvals or decisions. - The Project Proposer is planning to provide further opportunities this summer for the community to learn more about the next steps for the project. This is additive to the ongoing public approval processes and permitting requirements. Comment Process Concerns Response - The Project Proposer and City acknowledge the importance of public participation in the environmental review and site plan review process and the project team is following the AUAR steps to notify the community and collect public comments during this process. - All appendices were included as part of the Draft AUAR. Updates noted in this Final AUAR are in response to comments. - The City as the RGU responded to the Minnesota Center for Environmental Advocacy (MCEA) and Stop the Hermantown Data Center (SHDC)'s request to extend the comment period. - The Final AUAR Mitigation Plan has been updated to include a requirement that the Project Proposer and City create a complaint reporting process that will be created prior to construction and implemented for construction and post operations. - The City of Hermantown appreciates the perspective on public engagement. As a statutory city, state statute outlines the process and procedure for public engagement and notification on proposed projects.

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		The City of Hermantown followed the statutory requirements on engagement and notification.
Broader Social, Technological, or Ethical Topics	AI and Technology: Comments raise concerns about artificial intelligence, including job displacement, lack of regulation, and broader societal implications. Some commenters mention the use of AI in their personal/professional lives and believe many rely on data centers as well. Comments express concern of surveillance for profit purposes and want to know what information will be stored in the data center. Comments asked or implied that the AUAR is written by AI. Corporate Influence: Comments express concern that corporate interests may disproportionately benefit from tax incentives. Commenters express frustration about the partnership between the City and a rich company, bringing up that the City should work for constituent needs over trusting corporations and allowing them to bypass the rules, when these companies cannot be trusted and do not care about the community. Commenters expressed frustration with the change in the 2045 Comprehensive Plan to accommodate the data center.	AI and Technology Response • Socioeconomic impacts such as job displacement or changes in labor markets are outside the statutory scope of environmental review under an AUAR. However, these comments are in the administrative record for consideration in this environmental review (AUAR) process. • Google data centers support the digital services the public relies on every day, including 911 systems, electronic banking, remote work, video streaming, and email. They help businesses operate efficiently through cloud-based tools, online payments, and logistics systems while enabling governments, hospitals, and companies to securely store and share critical information. • Data centers also power advancements in artificial intelligence, scientific research, cancer detection, and natural disaster tracking, helping shape the future of technology and public safety. • The AUAR was not written by AI. Corporate Influence Response • Tax policy, incentive structures, and economic equity considerations for data centers are not evaluated within the AUAR framework and any broader changes would be addressed through separate state or local legislative and policy approval processes. • See response below about community benefits and the Project Proposer's investments in the community related to this project.

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	Commenters suggest that the City is rushing this project and asked for more information regarding Harmony Group's presence and actions in Minnesota, and for Google to provide financial resources to Hermantown to help minimize the effects of the project. Trends and Comparisons: Comments reference experiences of data centers in other communities, citing reports of negative light and noise impacts associated with data centers and noting that other cities have paused the development of data centers.	Trends and Comparison Response Data center design can be highly variable between end users and their needs. This AUAR evaluated a specific data center development and documented the assumptions and inputs to provide a maximum development scenario and associated noise, light, and other resource mitigation. Any future development proposals must align with the AUAR assumptions for future regulatory approvals that would be needed.
Economic Impacts and Community Benefits	Economic Impacts and Benefits: Comments questioned whether economic benefits justify the impacts or if there will be economic benefits at all. Some question the quality and amount of new jobs offered from the project. Another commenter noted that the data center could benefit Hermantown economically and make the area a hub for modern infrastructure that helps other industries. Community Protections and Benefits: Several comments express doubt that the public will benefit at all from a data center. Comments questioning	Economic Impacts and Benefits Response - The evaluation of public costs, tax policy, or economic return on investment is outside the statutory scope of environmental review under MEPA and the AUAR does not determine the appropriateness of public expenditures, incentives, or land use priorities. - More information about the Hermantown data center jobs and economic benefits can be found at: hermantowndatacenter.com and Google's data center community impact report from 2025: https://www.gstatic.com/marketing-cms/b2/68/1ba0c29d43eea58823d2baafed74/data-center-community-impact-report-2025-external-stakeholder-briefing.pdf

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	how the community will be protected, what and how accountability measures for pollution will be enforced, noting that there aren't consequences to prevent them from breaking thresholds since a fine is not a significant punishment, with comments suggesting Google compensate well owners for well impacts. Comments request the creation of a Community Advisory Board with access to ongoing monitoring for stormwater, noise, air quality and habitat restoration. Several comments raised concerns relating to increased traffic and congestion due to construction and the potential impact of this construction on emergency response times. Specifically regarding increased traffic, commenters requested a regional traffic analysis across Thomson, Midway, and Solway townships. Some commenters noted that this project could add value to the community through lower future infrastructure costs, provide economic support, and attract other businesses to the area. Some comments ask for more information about commitment to the employment opportunities provided by the data center such as	Community Protections and Benefits Response • The mitigation plan in the Final AUAR presents the Project Proposer's commitments, required mitigation as discussed in the AUAR, and applicable regulatory requirements. This combined approach of evaluating project-specific commitments, known mitigation measures evaluated in the AUAR, and their relationship to existing regulatory regimes describes how the mitigation plan will be applied and assurances that it will be applied. • In response to significant public comments with concerns about the enforceability of the AUAR Mitigation Plan, the Final AUAR Mitigation Plan was updated to include the associated agency responsible for reviewing and enforcing the applicable mitigation item. The permitting matrix in Table 6 also describes which agencies are responsible for enforcing permitting and approval prior to project construction. • Final government decisions on project permits and approvals cannot be granted unless the project elements are consistent with the assumptions made in the AUAR and comply with the mitigation plan. Accordingly, the City cannot grant an SUP for the Project that fails to incorporate the mitigation elements. An SUP can be revoked for failure to comply with its conditions, so noncompliance could result in penalties up to permit revocation. Hermantown Ordinances Section 704. • In addition, to ensure transparency, timely response to concerns, awareness for future enforcement, and accessibility to enforcement in the future, a new mitigation item was added to require development of a complaint response plan that would begin during construction and remain in place through post-operations. A complaint response plan would include a clear mechanism for area Hermantown residents and businesses to report concerns that will be directed to both the City and Google for review and follow up response.

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	how many will be on site, 100 or 130 jobs, why is there a 5 year time mark on the jobs. Several public comments raised concerns that the proposed data center could become obsolete, be abandoned, or that the developer could fail or exit before the end of the facility's useful life. Comments called for a bond to cover decommissioning in the event of depreciation or bankruptcy, as well as a separate bond to compensate downstream well owners if wells dry up or become polluted. Comments requested a reclamation bond sufficient to remove all buildings and impervious surfaces and restore the site to native forest if the campus is abandoned without adaptive reuse. Comments called for an Environmental Performance Assurance and Adaptive-Mitigation Fund established before construction and maintained through the project's operational life, paired with an enforceable Google LLC parent-company guarantee, City approval before any transfer of obligations, and a requirement that replacement financial assurance be secured before any existing bond or guarantee is released, so that obligations survive	Neighborhood Impacts Response • There are several neighborhood and community character related considerations that fall within the environmental review scope that are addressed in the AUAR such as water resources, air quality, traffic, noise and lighting. Like any development that occurs in Hermantown, the Project Proposer must abide by all the city's development requirements for a data center to mitigate any land use conflicts. • Impacts on property values that result from light industrial development are not covered under the scope of an AUAR. Property values are influenced by a complex interaction of factors, which are usually parcel specific such as condition, size, improvements, acreage and neighborhood characteristics; the proximity to schools, parks and other amenities; and the presence of existing infrastructure, for example, highways, or railways. In addition to property-specific factors, local and national market trends, as well as interest rates can affect these measures. • Both the Project Description (Item 5) and Noise (Item 19) sections have been updated with more clarifications on construction duration, impacts, and mitigation. • For more information about decommissioning and financial responsibility, see response under the Land Use summary above. Tax Abatement Response • Tax policy, incentive structures, and economic equity considerations for data centers are not evaluated within the AUAR framework and any broader changes would be addressed through separate state or local legislative and policy approval processes. • Today, the land uses in the Study Area generate around \$80,000 per year in tax revenue. This proposed Project would bring significantly higher, long-term city, school district, and county tax revenue once operational.

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	abandonment, sale, insolvency, or bankruptcy. Neighborhood Impacts: Comments express concern about changes to community character, nature, traffic and construction (hours/impacts), proximity to homes, displacement, and farms, property values, construction dust health impacts, increased utility costs and long-term quality of life. Comments expressed concern about the precedent it sets for future development of Hermantown and raise concern that Hermantown will become urbanized. Tax Abatement: Comments raise concerns about the fairness of building new infrastructure like roads, water systems, and utilities for Google's facility should count as a benefit to the community. Comments suggested that Google should pay taxes like everyone else.	• The Project Proposer has applied for public financial assistance in accordance with the City of Hermantown's adopted Business Subsidy Policy. The City is conducting a financial analysis to determine the viability of providing potential tax abatement. City approvals for public financial assistance and the corresponding development obligations would be implemented and enforced by Development Agreement and Tax Abatement Agreement. • Additionally, there are anticipated 'ripple taxes' from this proposed Project, which include tax revenue from increased economic activity associated with the project, such as: ○ Increased visitor/lodging taxes; ○ Increased sales and use taxes (e.g., construction workers and others spending money in the area) ○ Increased spending power of local residents with elevated wages; and ○ The potential for tax revenue from complimentary industries that co-locate.
Comments Proposing Alternatives	Considerations of Alternatives • Comment Suggesting Inclusion of a No-Build Alternative	Considerations of Alternatives Response • The City prepared this AUAR to be consistent with the Hermantown 2045 Comprehensive Plan which identifies the study area as a future Business and Light Manufacturing. • EQB Guidance specifies that "the AUAR must include a scenario based on the existing comprehensive plan. This scenario takes the place of the no

Comment Theme	Summary	Response
	• Comment Suggesting Smaller Data Center • Comment Suggesting an Underground Data Center • Comment suggesting an offshore data center as an alternative to land-based siting. • Battery Energy Storage Systems (BESS) instead of diesel generation. Compatibility and Location: Comments question the use of land, with some suggesting to look at alternative sites that are more industrial or considering community serving uses for the Study Area such as a wildlife preserve, housing, or farming. Some commenters also support the proposed location due to its proximity to electrical transmission lines. Comments raised concerns that the current location is within the St. Louis River Watershed, which leads straight to Lake Superior. Comments mentioned that the data center could be located where there is existing municipal and sewer service instead of extending it to a new location.	build alternative required in an EIS.” The proposed Project is consistent with the Hermantown 2045 Comprehensive Plan. • It is acceptable and possible for the Project Proposer to develop a data center campus below the maximum development capacity impact thresholds identified in this AUAR document. • An underground data center evaluation is not within the scope of the AUAR, and would be inconsistent with the purpose of the project. • An offshore data center evaluation is not within the scope of the AUAR and would be inconsistent with the purpose of the project. • The AUAR does not evaluate BESS as an alternative to diesel generators because exact backup power and generation needs have not been determined and study of diesel generators represents the maximum impact scenario. Compatibility and Location Response • The Project Proposer uses a rigorous process to select sites, which includes factors like proximity to customers and users, local talent, land, and availability of (or potential to bring new) carbon-free energy. Minnesota’s commitment to clean energy and availability of clean energy resources from Minnesota Power has made this an attractive site for development of a data center for the Project Proposer. • The Study Area already contains light industrial uses such as the existing electrical substation (Arrowhead Substation) and several transmission lines that run from the substation that makes this area conducive to developing other light industrial uses. Additionally, the land is guided as Business and Light Manufacturing in the City’s 2045 Comprehensive Plan, which calls for the integration of commercial and industrial land uses which are compatible with each other, including office, light industrial, and retail/service uses. The proposed data center is a light industrial use that falls within this category.

Comment Theme	Summary	Response
		• See the comment response about neighborhood impacts for more information about how design elements are being incorporated to avoid neighborhood impacts from noise, light, and traffic. • The proposed Project will not directly impact Lake Superior from stormwater, groundwater, water use, or other water resource related impacts. • The proposed site does require water and sewer extensions; however, it is adjacent to existing energy infrastructure and that was a key reason for site selection.
Energy Demand and Grid Impacts	Energy Demand and Grid Impacts: Comments raise concerns about electricity demand, grid reliability, renewable energy commitments, impacts of power outages, and energy cost increases on taxpayers. Comments also express concern that these issues have not been adequately addressed in the environmental review and question whether proposed clean energy commitments are sufficient relative to the facility's anticipated energy consumption. Commenters requested disclosure of the facility's total nameplate capacity at full buildout, demand by individual building, and underlying utilization-rate assumptions used to project energy needs and backup generation requirements.	Energy Demand and Grid Impacts Response • Energy use/load, cost, and infrastructure needs are addressed as a qualitative topic in the AUAR in Items 18 and 22. • The Project Proposer operates highly energy efficient data centers with energy usage efficiency better than industry average (see more info at: https://datacenters.google/efficiency/). Minnesota Power will provide the energy to the proposed data center campus, and the data center will be served under an existing regulated rate structure in compliance with the Minnesota law that ensures existing customers do not pay for costs associated with connecting and serving a new large customer and that the state's carbon-free electricity standard is met. • Data center customers are required to submit plans, utilities and grid operators perform reliability studies and if needed, data center customers pay for grid improvements to support additional load of any kind. Minnesota Power has a robust load interconnection study process to ensure grid stability for any additional load being added. • The Project Proposer has robust corporate sustainability objectives, including carbon free electricity goals (see more here: https://datacenters.google/operating-sustainably/). Additionally, this project will enable the development of 700 megawatts (MW) of new clean energy resources without increasing costs to Minnesota Power customers. These system assets, including 300 MW of wind energy and 400 MW of

Comment Theme	Summary	Response
	Emergency Response Impacts: Multiple public comments raised concerns about what happens when things go wrong at the facility — emergencies, spills, malfunctions, or enforcement failures. Several comments asked for the AUAR to explicitly describe emergency scenarios and their environmental consequences, including fires, hazardous waste spills, power outages, floods, construction delays, medical emergencies at the site, and roads blocked by construction vehicles that could delay ambulance or fire response. Comments requested information on whether responsiveness was automated, and how quickly a response could be completed. Comments requested a defined investigation deadlines, independent testing of credible or recurring complaints, corrective-action deadlines, and operational restrictions or penalties for failure to correct verified impacts, clear identification of which entity is legally and financially responsible if actual impacts exceed what the AUAR predicted.	battery storage, will support progress toward Minnesota’s carbon-free standard and strengthen the resilience of the electrical system for all Minnesota Power customers. In addition, Minnesota Power and the Project Proposer will work together to identify opportunities to deploy demand flexibility capabilities that can help reduce grid strain during peak times. Under its Energy Forward strategy, Minnesota Power has made significant progress toward meeting the requirements of Minnesota’s carbon-free law, with customers receiving over 60% of energy from renewable sources today. • Minnesota’s grid planning and reliability has a regulated electricity system which is governed by laws and the Minnesota Public Utilities Commission (MPUC). For more information on this topic, see Minnesota Power’s statement⁹ about the electric grid and data centers. • For additional information on how and why the Minnesota Environmental Quality Board’s Greenhouse Gas calculator was used to evaluate emissions in this AUAR, see the memo at the end of this attachment. This also includes a comparison to other EPA Greenhouse Gas tools and the differences between them. Emergency Response Impacts Response: • Fire risk is managed through design, strict adherence to regulations, and ongoing maintenance. All fire protection and emergency egress systems are designed in accordance with the International Building Code, International Fire Code, and City of Hermantown Fire Department requirements, following the most stringent applicable standards. • The facilities are permitted according to local regulations (City of Hermantown), and fire hazards are regularly evaluated. All fire protection systems and equipment are inspected, tested, and maintained in compliance with state legislation and City requirements. The City of

⁹ Source: https://minnesotapower.blob.core.windows.net/content/Content/Documents/Community/DataCenters/our_electric_grid_and_data_centers.pdf

Comment Theme	Summary	Response
		Hermantown Fire Department would conduct annual inspections and reporting and assist with mitigating any fire hazards, ensure compliance with the State Fire Code, and provide reporting. • The Project Proposer must prepare a spill prevention plan for any fuel stored on site that would provide actions related to this. • If there's a medical emergency on site, the City of Hermantown EMS would be called. • The Final AUAR Mitigation Plan has also been updated to include a complaint reporting process for community members to file complaints during construction and post operations.
Error in Document	One comment notes a figure reference error in the Wetland appendix of the AUAR. One comment notes Figure 8 (now Figure 11 in the Final AUAR), existing zoning is currently depicted incorrectly.	• The figure reference error has been updated in the Final AUAR. • Figure 11 (Existing Zoning) has been updated to be consistent with City's zoning for the area surrounding the Study Area.
Expressions of Support or Opposition	Comments express general support for or opposition to the project without raising specific environmental issues. Some commenters also noted the University of Wisconsin-Superior survey results, which show that 74% of local residents oppose the data center project and suggest that the city should cancel or pause the project and support a statewide moratorium or further environmental review to identify best practices.	• The Project Proposer and City recognize that comments reflect a range of public perspectives on the proposed data center. • This AUAR is not an endorsement or approval for any project(s) allowed under the development evaluated in the AUAR.

Commenters

Ahnika Berg

26-417

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Environmental Impacts
 - Air Quality
 - Climate Change
 - Hazardous Waste
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection
 - Wildlife

Alex H.

26-365

- Water Resources and Wildlife
 - Wildlife

Alexis Scarbrough

26-355

- Broader Social, Technological, or Ethical Topics
 - AI and Technology
 - Corporate Influence
- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Light Conditions
- Environmental Review Process
 - Desire for Additional Evaluation
- Noise Impacts
 - Operational Noise
- Transparency

Alicia Navetta

26-541

- Environmental Review Process
 - Request for an Environmental Impact Statement
- Water Resources and Wildlife
 - Water Quality and Contamination

Allison Hafften

26-506

- Energy Demand and Grid Impacts
- Environmental Review Process

Environmental Impact Statement
Expressions of Support or Opposition
Water Resources and Wildlife
 Water Quality and Contamination
 Water Supply, Use, Groundwater, and Protection
 Wildlife

Amanda Goodreau

26-422

Broader Social, Technological, or Ethical Topics
 Corporate Influence
Economic Impacts and Community Benefits
 Community Protections and Benefits
 Neighborhood Impacts
Environmental Impacts
 Air Quality
Environmental Review Process
 Request for an Environmental Impact Statement
Expressions of Support or Opposition
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination
 Wildlife

Amanda Mosiniak

26-539

Broader Social, Technological, or Ethical Topics
 AI and Technology
Economic Impacts and Community Benefits
 Economic Impacts and Benefits
Expressions of Support or Opposition
Transparency

Amy LaFlamme

26-375

Expressions of Support or Opposition
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination

Andrew O'Brien

26-543

Economic Impacts and Community Benefits
 Neighborhood Impacts
Environmental Review Process
 Request for an Environmental Impact Statement

Expressions of Support or Opposition
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination

Angela Scott

26-565

Economic Impacts and Community Benefits
 Neighborhood Impacts
Environmental Impacts
 Air Quality
Environmental Review Process
 Request for an Environmental Impact Statement
Expressions of Support or Opposition
Public Engagement and Process Concerns
 Public Engagement
Water Resources and Wildlife
 Water Quality and Contamination
 Wildlife

Anita Fairman

26-446

Economic Impacts and Community Benefits
 Neighborhood Impacts
Environmental Impacts
 Air Quality
 Climate Change
Water Resources and Wildlife
 Wildlife

Annette Ralph

26-497

Broader Social, Technological, or Ethical Topics
 Corporate Influence
Economic Impacts and Community Benefits
 Neighborhood Impacts
Energy Demand and Grid Impacts
Environmental Review Process
 Desire for Additional Evaluation
 Lack of Project Clarity
 Request for an Environmental Impact Statement
Expressions of Support or Opposition
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination

Anomaly HOQ**26-430**

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Anonymous 1**26-400**

- Environmental Impacts
 - Light Conditions
 - Utilities and Infrastructure
- Transparency
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Anonymous 2**26-399**

- Energy Demand and Grid Impacts
- Environmental Impacts
 - Light Conditions
- Environmental Review Process
 - Request for an Environmental Impact Statement
 - Study Area and Scope
- Noise Impacts
 - Operational Noise
- Transparency
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Water Supply, Use, Groundwater, and Protection

Arlene Kelley**26-367**

- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Ashley Anderson**26-527**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Land Use
 - Long-Term Conditions and Post-Operational Considerations
- Noise Impacts

- Operational Noise
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Water Supply, Use, Groundwater, and Protection
 - Wetlands Impact
 - Wildlife

Barbara Brandt**26-554**

- Noise Impacts
 - Operational Noise
- Public Engagement and Process Concerns
 - Public Engagement
- Water Resources and Wildlife
 - Wildlife

26-555

- Expressions of Support or Opposition

Barbara Opal**26-503**

- Broader Social, Technological, or Ethical Topics
 - Trends and Comparisons
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Land Use
 - Long-Term Conditions and Post-Operational Considerations
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

Becca Grumdahl**26-524**

- Expressions of Support or Opposition

Ben Staupe**26-538**

- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
 - Tax Abatement
- Energy Demand and Grid Impacts
- Environmental Impacts
 - Air Quality

Bob and Cathy Kohlmeier**26-439**

- Environmental Review Process
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26-442

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Operational Noise

26-443

Environmental Review Process

Lack of Project Clarity

26-448

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Construction Noise

26-449

Economic Impacts and Community Benefits

Community Protections and Benefits

Land Use

Long-Term Conditions and Post-Operational Considerations

26-453

Environmental Review Process

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Operational Noise

Transparency

26-478

Water Resources and Wildlife

Water Supply, Use, Groundwater, and Protection

26-498

Noise Impacts

Operational Noise

Transparency

26-507

Environmental Review Process

Request for an Environmental Impact Statement

Noise Impacts

Operational Noise

26-528

Transparency

Brea Schminski

26-568

Economic Impacts and Community Benefits

Neighborhood Impacts

Environmental Impacts

Air Quality

Urban Heat Island Effect

Environmental Review Process

Lack of Project Clarity

Environmental Review Process

Request for an Environmental Impact Statement

Expressions of Support or Opposition

Water Resources and Wildlife

Water Quality and Contamination

Water Supply, Use, Groundwater, and Protection

Brett Harkness

26-418

Broader Social, Technological, or Ethical Topics

AI and Technology

Economic Impacts and Community Benefits

Community Protections and Benefits

Water Resources and Wildlife

Wetlands Impact

Brian Bergeron

26-356

Energy Demand and Grid Impacts

Environmental Impacts

Air Quality

Light Conditions

Environmental Review Process

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Study Area and Scope

Transparency

Water Resources and Wildlife

Water Quality and Contamination

Wetlands Impact

Brian Gross

26-476

Economic Impacts and Community Benefits

Community Protections and Benefits

Environmental Review Process

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Expressions of Support or Opposition

Water Resources and Wildlife

Water Quality and Contamination

Brian Meier

26-396

Broader Social, Technological, or Ethical Topics

AI and Technology

Economic Impacts and Community Benefits

Community Protections and Benefits

Brian Scott

26-481

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
- Environmental Review Process
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- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Brooke Nelson

26-372

- Broader Social, Technological, or Ethical Topics
 - Trends and Comparisons
- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Candi Mock

26-559

- Environmental Review Process
 - Request for an Environmental Impact Statement

Catherine Kohlmeier

26-520

- Comments Proposing Alternatives
 - Compatibility and Location
- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Water Resources and Wildlife
 - Wetlands Impact

26-522

- Economic Impacts and Community Benefits
 - Neighborhood Impacts

26-523

- Environmental Review Process
 - Request for an Environmental Impact Statement

Cathy Nevanen

26-552

- Environmental Review Process
 - Desire for Additional Evaluation

- Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Chelsey Harju**26-460**

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Economic Impacts and Community Benefits
 - Community Protections and Benefits
 - Economic Impacts and Benefits
 - Neighborhood Impacts
 - Tax Abatement
- Environmental Impacts
 - Air Quality
 - Light Conditions
- Noise Impacts
 - Construction Noise
 - Operational Noise
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

Chloe Eckstein**26-542**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Review Process
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- Noise Impacts
 - Operational Noise
- Public Engagement and Process Concerns
 - Public Engagement
- Water Resources and Wildlife
 - Water Quality and Contamination

Christa Feely**26-391**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process
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Cindy Lee Olson

26-407

Energy Demand and Grid Impacts

26-408

Broader Social, Technological, or Ethical Topics
 AI and Technology
Economic Impacts and Community Benefits
 Community Protections and Benefits

Conner Tuman

26-434

Economic Impacts and Community Benefits
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Environmental Impacts
 Air Quality
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Water Resources and Wildlife
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Connie LiaBraaten

26-456

Expressions of Support or Opposition

Connie Nightwine

26-366

Expressions of Support or Opposition

Corey Brady

26-370

Broader Social, Technological, or Ethical Topics
 Corporate Influence
Energy Demand and Grid Impacts
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Noise Impacts
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Water Resources and Wildlife
 Water Quality and Contamination

Water Supply, Use, Groundwater, and Protection

Daniel Skorich

26-423

Comments Proposing Alternatives
Compatibility and Location
Water Resources and Wildlife
Water Quality and Contamination

Danielle Stanich

26-353

Economic Impacts and Community Benefits
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David Thornton

26-474

Economic Impacts and Community Benefits
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David Wahlberg

26-387

Economic Impacts and Community Benefits
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Dawn Lapointe

00-000

Error in Document
Transparency

26-535

Environmental Impacts
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Deanna Geelhoed**26-420**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
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- Environmental Impacts
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 - Light Conditions
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- Noise Impacts
 - Operational Noise
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 - Water Quality and Contamination
 - Wetlands Impact

Debra Thortensen**26-428**

- Economic Impacts and Community Benefits
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 - Water Quality and Contamination

Delaney Hudson**26-465**

- Comments Proposing Alternatives
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Deric Absher

26-547

- Broader Social, Technological, or Ethical Topics
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Donna Moore

26-550

- Economic Impacts and Community Benefits
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Ed Benner

26-537

- Economic Impacts and Community Benefits
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Eleanor Dolan

26-383

- Energy Demand and Grid Impacts
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Elliot McDill

26-518

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Emily Rakos

26-519

Economic Impacts and Community Benefits
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Emma

26-421

Economic Impacts and Community Benefits
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Water Quality and Contamination

Emma Richtman

26-455

Economic Impacts and Community Benefits

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 - Construction Noise
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 - Comment Process Concerns
- Transparency
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 - Water Supply, Use, Groundwater, and Protection

Emmet Sutton**26-447**

- Economic Impacts and Community Benefits
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Esther Den Herder**26-556**

- Environmental Impacts
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26-566

- Economic Impacts and Community Benefits
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Gail Garrick**26-493**

- Economic Impacts and Community Benefits
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 - Water Quality and Contamination

Georgia Lane**26-401**

- Economic Impacts and Community Benefits
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Ginny Burdue**26-359**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Environmental Review Process
 - Lack of Project Clarity
- Expressions of Support or Opposition

26-361

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Environmental Review Process
 - Lack of Project Clarity
- Expressions of Support or Opposition

Greg Rupert**26-487**

- Transparency

James Thorstensen**26-499**

- Broader Social, Technological, or Ethical Topics
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Urban Heat Island Effect

Jean Fairchild

26-466

Water Resources and Wildlife

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Jeffery Hammerstrom

26-363

Expressions of Support or Opposition

Jennie Lindberg

26-514

Economic Impacts and Community Benefits

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Jennifer Jacobson

26-526

Economic Impacts and Community Benefits

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Jill Beyer

26-534

Broader Social, Technological, or Ethical Topics

Corporate Influence

Trends and Comparisons

Economic Impacts and Community Benefits

Economic Impacts and Benefits

Neighborhood Impacts

Noise Impacts

Operational Noise

Water Resources and Wildlife

Water Quality and Contamination

Jill Jacoby

26-511

Energy Demand and Grid Impacts

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Climate Change

Lack of Project Clarity

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Construction Noise

Operational Noise

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Wetlands Impact

Wildlife

Jim and Tracy Sonneson

26-569

Economic Impacts and Community Benefits

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Water Quality and Contamination

Water Supply, Use, Groundwater, and Protection

Wetlands Impact

Wildlife

Jim Patnaude

26-525

Economic Impacts and Community Benefits

Neighborhood Impacts

Environmental Impacts

Air Quality

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Expressions of Support or Opposition

Water Resources and Wildlife
Water Quality and Contamination
Wildlife

Jim Wozniak

26-512

Environmental Impacts
Urban Heat Island Effect
Utilities and Infrastructure
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Land Use
Long-Term Conditions and Post-Operational Considerations
Water Resources and Wildlife
Water Quality and Contamination
Water Supply, Use, Groundwater, and Protection

Jlthorn

26-530

Economic Impacts and Community Benefits
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Expressions of Support or Opposition
Water Resources and Wildlife
Water Quality and Contamination
Wildlife

Jo Anne Bates

26-404

Expressions of Support or Opposition

26-406

Expressions of Support or Opposition

26-475

Noise Impacts
Operational Noise

26-490

Energy Demand and Grid Impacts
Environmental Impacts
Air Quality

26-491

Energy Demand and Grid Impacts
Water Resources and Wildlife
Water Quality and Contamination
Wetlands Impact

Wildlife

26-492

Economic Impacts and Community Benefits

Community Protections and Benefits

Water Resources and Wildlife

Water Quality and Contamination

John Munter

26-409

Noise Impacts

Operational Noise

26-410

Environmental Review Process

Desire for Additional Evaluation

26-411

Environmental Review Process

Desire for Additional Evaluation

26-412

Water Resources and Wildlife

Water Quality and Contamination

26-413

Land Use

Long-Term Conditions and Post-Operational Considerations

26-414

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26-415

Water Resources and Wildlife

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26-426

Economic Impacts and Community Benefits

Economic Impacts and Benefits

Noise Impacts

Operational Noise

26-427

Noise Impacts

Operational Noise

26-441

Broader Social, Technological, or Ethical Topics

AI and Technology

26-461

Economic Impacts and Community Benefits

Community Protections and Benefits

26-462

Energy Demand and Grid Impacts

26-463

Environmental Impacts
Hazardous Waste

JT Haines

26-386

Economic Impacts and Community Benefits
Neighborhood Impacts
Public Engagement and Process Concerns
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26-416

Public Engagement and Process Concerns
Comment Process Concerns

Julie M

26-445

Broader Social, Technological, or Ethical Topics
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Water Resources and Wildlife
Water Quality and Contamination
Water Supply, Use, Groundwater, and Protection
Wetlands Impact

Julie O'Leary

26-531

Broader Social, Technological, or Ethical Topics
Corporate Influence
Economic Impacts and Community Benefits
Neighborhood Impacts
Energy Demand and Grid Impacts
Environmental Impacts
Air Quality
Climate Change
Hazardous Waste
Light Conditions
Utilities and Infrastructure
Environmental Review Process

- Desire for Additional Evaluation
- Lack of Project Clarity
- Request for an Environmental Impact Statement
- Error in Document
- Land Use
 - Long-Term Conditions and Post-Operational Considerations
- Noise Impacts
 - Operational Noise
- Transparency
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Water Supply, Use, Groundwater, and Protection
 - Wetlands Impact
 - Wildlife

Karen Holden**26-360**

- Expressions of Support or Opposition

Kathy Nelson**26-373**

- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Environmental Impacts
 - Climate Change
- Environmental Review Process
 - Desire for Additional Evaluation
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Kathy Riddle**26-482**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Review Process
 - Desire for Additional Evaluation
- Water Resources and Wildlife
 - Wildlife

Katie Jorgenson**26-362**

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Comments Proposing Alternatives

- Compatibility and Location
- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
- Energy Demand and Grid Impacts
- Environmental Impacts
 - Urban Heat Island Effect
- Transparency

Katy Bombard**26-451**

- Environmental Impacts
 - Light Conditions
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Wetlands Impact
 - Wildlife

Kelly Madigan**26-459**

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
- Environmental Impacts
 - Hazardous Waste
- Environmental Review Process
 - Desire for Additional Evaluation
 - Request for an Environmental Impact Statement
- Noise Impacts
 - Operational Noise
- Transparency
- Water Resources and Wildlife
 - Water Quality and Contamination

Kiera Simmons**26-464**

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
- Environmental Review Process
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 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Kirk Deen**26-496**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts

Environmental Impacts

Air Quality

Environmental Review Process

Request for an Environmental Impact Statement

Expressions of Support or Opposition

Noise Impacts

Operational Noise

Water Resources and Wildlife

Water Quality and Contamination

Kit Kat

26-436

Broader Social, Technological, or Ethical Topics

AI and Technology

Economic Impacts and Community Benefits

Community Protections and Benefits

Environmental Review Process

Study Area and Scope

Expressions of Support or Opposition

Kristen Schmitt

26-473

Energy Demand and Grid Impacts

Environmental Impacts

Climate Change

Hazardous Waste

Environmental Review Process

Request for an Environmental Impact Statement

Water Resources and Wildlife

Water Quality and Contamination

Laura W

26-560

Environmental Impacts

Air Quality

Environmental Review Process

Request for an Environmental Impact Statement

Expressions of Support or Opposition

Noise Impacts

Operational Noise

Water Resources and Wildlife

Water Quality and Contamination

Water Supply, Use, Groundwater, and Protection

Wildlife

Lee Marlow

26-516

Economic Impacts and Community Benefits

- Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

Linda Forsyth**26-532**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

Linda Herron**26-393**

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
 - Neighborhood Impacts
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Lisa Marlow**26-533**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process
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- Expressions of Support or Opposition
- Public Engagement and Process Concerns
 - Public Engagement
- Water Resources and Wildlife
 - Water Quality and Contamination

Wildlife

Lisa Parks

26-425

Expressions of Support or Opposition
Water Resources and Wildlife
 Water Supply, Use, Groundwater, and Protection
 Wildlife

Loretta Cartner

26-562

Broader Social, Technological, or Ethical Topics
 Corporate Influence
Economic Impacts and Community Benefits
 Economic Impacts and Benefits
 Tax Abatement
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Land Use
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Noise Impacts
 Operational Noise

M Schmitt

26-403

Economic Impacts and Community Benefits
 Economic Impacts and Benefits
Environmental Impacts
 Air Quality
 Climate Change
 Utilities and Infrastructure
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Supply, Use, Groundwater, and Protection

Maggie Hylton

26-545

Economic Impacts and Community Benefits
 Neighborhood Impacts
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Expressions of Support or Opposition

Noise Impacts
Operational Noise
Water Resources and Wildlife
Water Quality and Contamination

Martinique Williams

26-392

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Economic Impacts and Community Benefits
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Operational Noise

Mason Deegan

26-563

Water Resources and Wildlife
Wetlands Impact

Matthew LaFlamme

26-376

Environmental Impacts
Climate Change
Noise Impacts
Operational Noise
Transparency

McKenna Vanhorn

26-479

Economic Impacts and Community Benefits
Community Protections and Benefits

Melody David-McKnight

26-505

Broader Social, Technological, or Ethical Topics
Corporate Influence
Environmental Impacts
Climate Change
Environmental Review Process
Climate Change
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Expressions of Support or Opposition
Water Resources and Wildlife
Water Quality and Contamination
Wildlife

Michael Koppy and Carol Bonde

26-509

Energy Demand and Grid Impacts
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Long-Term Conditions and Post-Operational Considerations
Water Resources and Wildlife
Water Quality and Contamination

Michele Markell

26-424

Economic Impacts and Community Benefits
Neighborhood Impacts
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Air Quality
Urban Heat Island Effect
Environmental Review Process
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Noise Impacts
Operational Noise
Water Resources and Wildlife
Water Quality and Contamination

Mike Ralph

26-468

Economic Impacts and Community Benefits
Community Protections and Benefits
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Desire for Additional Evaluation
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Expressions of Support or Opposition
Water Resources and Wildlife
Water Quality and Contamination

26-477

Economic Impacts and Community Benefits
Community Protections and Benefits
Water Resources and Wildlife
Water Quality and Contamination

Molly Amiot

26-454

Economic Impacts and Community Benefits
Neighborhood Impacts
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Morgan Absher

26-548

- Broader Social, Technological, or Ethical Topics
 - Trends and Comparisons
- Environmental Review Process
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 - Water Quality and Contamination

Nancy Hanson**26-368**

- Broader Social, Technological, or Ethical Topics
 - AI and Technology
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

26-369

- Expressions of Support or Opposition

Nancy Miller**26-483**

- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
 - Tax Abatement
- Energy Demand and Grid Impacts
- Noise Impacts
 - Operational Noise
- Transparency
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Nick Rhinehart**26-489**

- Economic Impacts and Community Benefits
 - Tax Abatement
- Environmental Impacts
 - Hazardous Waste
- Environmental Review Process
 - Desire for Additional Evaluation
 - Lack of Project Clarity
- Water Resources and Wildlife
 - Wetlands Impact

Norm Herron**26-394**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process
 - Request for an Environmental Impact Statement

Expressions of Support or Opposition
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination

Peter Leete

26-470

Environmental Impacts
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 Wildlife

Phil Maloy

26-508

Broader Social, Technological, or Ethical Topics
 AI and Technology
 Corporate Influence
Economic Impacts and Community Benefits
 Community Protections and Benefits
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 Water Quality and Contamination

Phoenix Muchowski

26-452

Environmental Impacts
 Air Quality

RaeAnn Johnson

26-515

Economic Impacts and Community Benefits
 Neighborhood Impacts
Environmental Impacts
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Expressions of Support or Opposition
Water Resources and Wildlife
 Water Quality and Contamination
 Wildlife

Raymond Kantola

26-390

- Comments Proposing Alternatives
 - Considerations of Alternatives
- Economic Impacts and Community Benefits
 - Tax Abatement
- Environmental Impacts
 - Light Conditions
- Noise Impacts
 - Operational Noise

Rebecca Hamilton

26-354

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Comments Proposing Alternatives
 - Compatibility and Location
- Economic Impacts and Community Benefits
 - Neighborhood Impacts

Rich Winkler

26-486

- Noise Impacts
 - Operational Noise

Richard and Clarissa Ek

26-549

- Environmental Review Process
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Richard Hilton

26-546

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Economic Impacts and Community Benefits
 - Neighborhood Impacts
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- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Wetlands Impact

26-564

Environmental Review Process

Desire for Additional Evaluation

Robert Pagano

26-469

Expressions of Support or Opposition

Robin Nelson

26-395

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Considerations of Alternatives

Ronnie B

26-364

Broader Social, Technological, or Ethical Topics

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Expressions of Support or Opposition

Roslyn Scott

26-480

Economic Impacts and Community Benefits

Community Protections and Benefits

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Water Quality and Contamination

Ryan Heule

26-385

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Operational Noise

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Water Quality and Contamination

Water Supply, Use, Groundwater, and Protection

Wetlands Impact

Ryan Morff

26-374

- Economic Impacts and Community Benefits
 - Community Protections and Benefits
 - Tax Abatement
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- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

Samantha Benzing

26-358

- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Samantha Hendrickson

26-382

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Energy Demand and Grid Impacts
- Environmental Impacts
 - Air Quality
 - Light Conditions
 - Utilities and Infrastructure
- Expressions of Support or Opposition
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Water Supply, Use, Groundwater, and Protection
 - Wildlife

Sandra Goode

26-389

- Broader Social, Technological, or Ethical Topics
 - Trends and Comparisons
- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Review Process
 - Request for an Environmental Impact Statement

- Study Area and Scope
- Public Engagement and Process Concerns
 - Public Engagement
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wetlands Impact

Sarah Lofald**26-558**

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Environmental Impacts
 - Air Quality
- Environmental Review Process
 - Desire for Additional Evaluation
- Error in Document
- Expressions of Support or Opposition
- Noise Impacts
 - Operational Noise
- Public Engagement and Process Concerns
 - Comment Process Concerns
 - Public Engagement
- Transparency
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection
 - Wetlands Impact

Saul and Emily Helgeson**26-540**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process
 - Request for an Environmental Impact Statement
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 - Operational Noise
- Public Engagement and Process Concerns
 - Public Engagement
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Water Supply, Use, Groundwater, and Protection
 - Wetlands Impact

Scott Andrews**26-371**

- Comments Proposing Alternatives

- Compatibility and Location
- Economic Impacts and Community Benefits
 - Community Protections and Benefits
 - Economic Impacts and Benefits
- Environmental Impacts
 - Utilities and Infrastructure

Scout Jeffrey**26-450**

- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Serena White**26-550**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Review Process
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- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Shana Aue**26-419**

- Energy Demand and Grid Impacts
- Environmental Impacts
 - Urban Heat Island Effect
- Environmental Review Process
 - Desire for Additional Evaluation
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection
 - Wetlands Impact

Shelby Suhr**26-570**

- Environmental Impacts
 - Climate Change
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection
 - Wetlands Impact

Shelly Maloy**26-510**

Broader Social, Technological, or Ethical Topics

AI and Technology

Corporate Influence

Economic Impacts and Community Benefits

Community Protections and Benefits

Economic Impacts and Benefits

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Water Resources and Wildlife

Water Quality and Contamination

Sherry Roen

26-557

Water Resources and Wildlife

Wildlife

Sierra Pawanrat

26-567

Environmental Review Process

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Sophia LaGregg

26-444

Water Resources and Wildlife

Wildlife

Sophia Tran

26-405

Economic Impacts and Community Benefits

Neighborhood Impacts

Environmental Impacts

Air Quality

Environmental Review Process

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Expressions of Support or Opposition

Noise Impacts

Operational Noise

Water Resources and Wildlife

Water Quality and Contamination

Stacy Martin

26-517

Economic Impacts and Community Benefits

Neighborhood Impacts

Environmental Impacts

Air Quality

- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

Sue Anderson**26-543**

- Comments Proposing Alternatives
 - Compatibility and Location
- Environmental Review Process
 - Lack of Project Clarity
 - Request for an Environmental Impact Statement
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Wetlands Impact

Susan Darley-Hill**26-564**

- Energy Demand and Grid Impacts
- Expressions of Support or Opposition
- Land Use
 - Long-Term Conditions and Post-Operational Considerations
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wetlands Impact

Tamer Mische-Richter**26-357**

- Broader Social, Technological, or Ethical Topics
 - Corporate Influence
- Economic Impacts and Community Benefits
 - Community Protections and Benefits
 - Neighborhood Impacts
- Energy Demand and Grid Impacts
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Supply, Use, Groundwater, and Protection

Theresa Smith**26-495**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
- Environmental Review Process

Request for an Environmental Impact Statement
Expressions of Support or Opposition
Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination

Timothy Benner

26-467

Energy Demand and Grid Impacts
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 Utilities and Infrastructure
Noise Impacts
 Operational Noise

Timothy Spradau

26-352

Energy Demand and Grid Impacts
Environmental Review Process
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Noise Impacts
 Operational Noise

Tom Bates

26-500

Noise Impacts
 Operational Noise
Water Resources and Wildlife
 Water Quality and Contamination

26-501

Water Resources and Wildlife
 Water Supply, Use, Groundwater, and Protection

Tommy Fanagan

26-536

Expressions of Support or Opposition

Travis Drayna

26-438

Environmental Review Process
 Request for an Environmental Impact Statement

26-561

Energy Demand and Grid Impacts
Environmental Review Process
 Request for an Environmental Impact Statement

Tristan Schmid

26-440

Broader Social, Technological, or Ethical Topics

- Trends and Comparisons
- Economic Impacts and Community Benefits
 - Economic Impacts and Benefits
- Public Engagement and Process Concerns
 - Public Engagement
- Transparency

William Scott**26-566**

- Environmental Impacts
 - Air Quality
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Water Resources and Wildlife
 - Water Quality and Contamination

Yoshiya Kato**26-435**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Review Process
 - Request for an Environmental Impact Statement
- Expressions of Support or Opposition
- Noise Impacts
 - Operational Noise
- Water Resources and Wildlife
 - Water Quality and Contamination

Zack Reamer**26-513**

- Economic Impacts and Community Benefits
 - Neighborhood Impacts
- Environmental Impacts
 - Air Quality
 - Urban Heat Island Effect
- Environmental Review Process
 - Request for an Environmental Impact Statement
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 - Long-Term Conditions and Post-Operational Considerations
- Water Resources and Wildlife
 - Water Quality and Contamination
 - Wildlife

**Updated Hermantown Industrial Alternative Urban Areawide Review (AUAR)
Response to Minnesota Center for Environmental Advocacy (MCEA) Comment
(Greenhouse Gas Emissions from Data Center Electricity Consumption)**

The AUAR's GHG analysis was prepared using the Minnesota Climate Calculator (Version 1.2, March 2026), developed for the Minnesota Environmental Quality Board (EQB). Consistent with Minnesota environmental review guidance, the calculator estimates project GHG emissions over the expected life of a project and incorporates utility-specific electricity emission factors that change over time. The methodology, assumptions, and results are documented within the calculator and Appendix H to the AUAR.

The commenter requests additional transparency regarding the methodology and electricity emission factors applied by the calculator. The following information is provided.

Project Electricity Demand

- The AUAR evaluated a conservative upper-bound annual electricity demand of 4,467,600 megawatt-hours (MWh) per year (the upper end of the project specific estimate [2,233,800 - 4,467,600 MWh]).
- The EQB Climate Calculator converts this electricity demand into annual energy consumption of approximately 15,244,076,664,000 British thermal units (Btu) per year.

Utility-Specific Emission Factors Used by the EQB Calculator

For projects served by Minnesota Power, the EQB Climate Calculator contains utility-specific electricity emission factors in the Assumptions tab. The factors used by the calculator are shown below and are contained directly within the EQB Climate Calculator as utility-specific assumptions adopted by the State-developed tool.

Year	Minnesota Power Emission Factor (kg CO₂e/MMBtu)	Equivalent (kg CO₂e/kWh)
2025	162.739	0.555
2030	49.693	0.170
2035	16.882	0.058
2040	0.000	0.000
2045	0.000	0.000
2050	0.000	0.000

Calculation of First-Year Emissions

The project is assumed to begin operation in 2030 at the earliest. Accordingly, the calculator applies Minnesota Power's 2030 emission factor of 49.693 kg CO₂e/MMBtu to the project's annual electricity consumption. The first-year emissions calculation is:

$$15,244,076,664,000 \text{ Btu/year} \times 0.000001 \text{ MMBtu/Btu} \times 49.693 \text{ kg CO}_2\text{e/MMBtu}$$

$$= 757,520,420 \text{ kg CO}_2\text{e/year (approximately 757,520 metric tons CO}_2\text{e/year)}$$

Thus, the calculator does not estimate 74,028 metric tons CO₂e per year for the first year of operation. Rather, the first-year electricity-related emissions are approximately 757,520 metric tons CO₂e (approximately 835,000 short tons CO₂e) in 2030.

How Emissions Change Over Time

The EQB Climate Calculator does not hold electricity emission factors constant throughout the project life. Instead, it uses utility-specific milestone-year emission factors and linearly interpolates between those milestone years. The emissions presented in the calculator demonstrate this methodology.

For the proposed project, annual electricity-related emissions calculated by the EQB tool are:

Year	Emissions (kg CO ₂ e/year)
2030	757,520,420
2031	657,487,687
2032	557,454,955
2033	457,422,222
2034	357,389,490
2035	257,356,757
2036	205,885,406
2037	154,414,054
2038	102,942,703
2039	51,471,351
2040+	0

The EQB's Climate Calculator therefore assumes a gradual decline in Minnesota Power's electricity carbon intensity between 2030 and 2035, followed by a further decline between 2035 and 2040, reaching a carbon-free electricity emission factor beginning in 2040. Emissions remain zero thereafter for the remainder of the modeled operational lifetime.

Lifetime and Annualized Emissions

Because the EQB methodology evaluates emissions over the entire project life, it calculates cumulative emissions over the 50-year operational period and then annualizes those emissions over the total project lifetime. Using the declining emission factors discussed above, the calculator estimates:

- 3,923,505 metric tons CO₂e of cumulative building energy emissions over the project life; and

- 74,028 metric tons CO₂e per year on an annualized basis.

The annualized value presented in the AUAR is therefore not intended to represent emissions in the first year of operation. Rather, it represents the average annual emissions across the entire modeled project lifetime, which includes many future years when the calculator assumes Minnesota Power's electricity emission factor has declined substantially or reached zero.

Comparison with the Commenter's Estimates

The commenter relies primarily on current grid emission factors derived from Minnesota Power's existing generation mix, EPA resources, and regional grid carbon intensity information. The primary discrepancy is not the project's electricity demand, but whether future utility emissions should be assumed to remain at current levels or decline over time consistent with Minnesota's Clean Electricity by 2040 law and the utility-specific emission factors incorporated into the State-developed EQB Climate Calculator.

Minnesota Power System Emissions Approach

The comment's conclusion that the project should be assigned approximately 45 percent of Minnesota Power's current emissions inventory is not supported by the methodology used in Minnesota environmental review or by utility planning practices. The comment appears to compare this value to Minnesota Power's current annual retail sales or existing electricity demand and concludes that the project would increase utility demand by approximately 45 percent.

Even assuming the project increases Minnesota Power's retail electricity sales by approximately 45 percent, it does not follow that the project should be assigned 45 percent of Minnesota Power's current system-wide emissions. This approach implicitly assumes the utility's generation portfolio remains unchanged, new load is served by the existing resource mix, no additional renewable resources are added, no transmission upgrades occur, no new power purchase agreements are executed, and no compliance actions are taken under Minnesota's Clean Electricity by 2040 law. These assumptions are inconsistent with how regulated utilities plan for load additions. Minnesota utilities are required to update resource plans and demonstrate how future load growth will be served through a combination of generation additions, purchases, storage resources, transmission improvements, and demand-side programs. Minnesota Power's Integrated Resource Plan specifically discusses planning for future growth while maintaining compliance with Minnesota's carbon-free electricity requirements.

The commenter appropriately identifies that near-term electricity emissions could be on the order of 750,000 metric tons CO₂e per year, which is generally consistent with the EQB Climate Calculator's estimate of approximately 757,520 metric tons CO₂e in 2030. These values differ by less than 2 percent. The primary discrepancy is not the project's electricity demand, but whether future utility emissions should be assumed to remain at current levels or decline over time consistent with Minnesota's Clean Electricity by 2040 law and the utility-specific emission factors incorporated into the State-developed EQB Climate Calculator.

EPA GHG Equivalencies Calculator

The commenter also cites EPA's GHG Equivalencies Calculator. The EPA Equivalencies Calculator is not an emissions forecasting tool. Instead, it is a comparison tool that converts a user-supplied

amount of emissions into equivalent metrics such as passenger vehicles, homes' energy use, gasoline consumption, and acres of forest.

The GHG Equivalencies Calculator does not determine project-specific electricity emission factors. Rather, it uses EPA-developed default emissions and equivalency factors for illustrative comparison purposes. The EQB model then updates the utility emission factor over time to reflect Minnesota's statutory carbon-free electricity requirements. EPA does not intend the Equivalencies Calculator to be used as a project-level environmental review model or a utility-specific forecasting tool.

For a Minnesota environmental review document evaluating a project connected to Minnesota Power's service territory, the utility-specific EQB factors are inherently more representative than equivalency factors because they incorporate Minnesota-specific utility assumptions. Accordingly, the Equivalencies Calculator does not demonstrate an error in the AUAR. It simply applies a different and much broader emissions assumption than the utility-specific methodology used in the EQB Climate Calculator.

EPA Power Profiler Tool

The commenter further cites EPA's Power Profiler Tool. Power Profiler serves a different purpose than the EQB Climate Calculator. Power Profiler estimates the emissions profile associated with electricity generation in a geographic region based on historical eGRID data. It provides consumers with information regarding the emissions characteristics of electricity supplied in a particular region. The tool is therefore fundamentally backward-looking and inventory-based rather than forecast-based.

As EPA describes the tool, emissions factors are based on historical generation and emission information from regional electricity providers and balancing authorities. The values represent how electricity was produced during a reporting period, not how electricity is expected to be produced decades into the future. Consequently, the higher emissions obtained using Power Profiler primarily reflect its reliance on historical grid conditions and currently operating fossil generation, rather than future utility compliance pathways.

The commenter also presents estimates approaching 2 million metric tons CO₂e per year. Those estimates generally imply an emission factor on the order of:

$$\begin{aligned} &2,200,000 \text{ metric tons CO}_2\text{e/year} \div 4,467,600 \text{ MWh/year} \\ &= 0.492 \text{ metric tons CO}_2\text{e/MWh} \\ &= 0.492 \text{ kg CO}_2\text{e/kWh} \end{aligned}$$

This implied emission factor is approximately 2.9 times larger than the EQB Calculator's 2030 Minnesota Power factor (0.170 kg/kWh), and closer to historical regional grid-average emission factors. By contrast, the EQB Calculator's methodology assumes Minnesota Power's carbon intensity declines from 0.170 kg CO₂e/kWh in 2030 to 0.058 kg CO₂e/kWh in 2035 and to 0 kg CO₂e/kWh in 2040.

Electricity Emissions After 2040

The commenter asserts that any estimate of electricity consumption must continue to include GHG emissions after 2040 because electricity generation systems will likely continue to include some emitting resources. The commenter further argues that assuming zero emissions after 2040 is unrealistic and understates the project's long-term climate impacts.

The assumption applied in the AUAR is not a project-specific assumption developed by the applicant or the City. Rather, it is embedded within the Minnesota EQB Climate Calculator, a State-developed methodology intended for use in Minnesota environmental review. The calculator's treatment of electricity emissions reflects Minnesota's adopted energy policy and utility planning framework. Specifically, Minnesota enacted the Clean Electricity by 2040 law in 2023, which requires electric utilities serving Minnesota customers to provide electricity that is 100 percent carbon-free by 2040, with interim compliance requirements of 80 percent carbon-free electricity by 2030 and 90 percent carbon-free electricity by 2035. The Minnesota Department of Commerce describes the law as requiring electric utilities to provide "100% carbon-free electricity by 2040."^{1, 2}

The statute applies directly to investor-owned utilities such as Minnesota Power and establishes a regulatory framework under which utilities must generate or procure sufficient carbon-free electricity to satisfy their retail sales obligations. Minnesota Power's own Integrated Resource Plan identifies compliance with the Carbon-Free Standard as a statutory requirement and recognizes the requirement to achieve electricity generation or procurement equivalent to 100 percent carbon-free retail sales by 2040. It is not reasonable and would be purely speculative to assume that Minnesota Power would not comply with state law.

Accordingly, the EQB Climate Calculator incorporates utility-specific emission factors that progressively decline over time and reach zero beginning in 2040. The calculator then linearly interpolates between these milestone years and assigns a zero-carbon emission factor beginning in 2040. The resulting emissions trajectory is therefore a direct implementation of the State-developed methodology rather than an assumption unique to this project.

Furthermore, the purpose of the AUAR is to evaluate environmental effects using accepted methodologies and reasonably available information. The commenter has not identified an error in the calculator's implementation of the EQB methodology. Rather, the commenter disagrees with the policy and forecasting assumptions incorporated into the State-developed model. While future electricity-sector emissions may ultimately differ from current projections, the EQB calculator reflects Minnesota's adopted carbon-free electricity standard and therefore provides a reasonable and appropriate basis for estimating long-term electricity-related greenhouse gas emissions for environmental review purposes.

Conclusion

The AUAR's GHG analysis was prepared using the State-developed EQB Climate Calculator and is consistent with the methodology currently recommended for Minnesota environmental review. The calculator's results are based on utility-specific electricity emission factors contained within the EQB tool and a lifetime accounting framework that incorporates declining electricity carbon intensity over time.

¹ <https://mn.gov/commerce/energy/clean/cleanelectricity2040/>

² <https://mn.gov/commerce/energy/clean/clean-energy-laws/>

As noted above, the EQB Climate Calculator estimates approximately 757,520 metric tons of CO₂e from electricity consumption during the first year of operation, with emissions declining thereafter as Minnesota Power's carbon intensity decreases under the State's carbon-free electricity transition. The reported annualized value of approximately 74,028 metric tons CO₂e per year reflects the average emissions over the modeled project lifetime rather than emissions expected during the initial years of operation. Thus, the EQB Climate Calculator recognizes substantial near-term electricity-related emissions while also accounting for Minnesota's legally mandated transition to carbon-free electricity.

The assumption of zero electricity-related emissions after 2040 is consistent with the methodology prescribed by the Minnesota EQB Climate Calculator and is supported by Minnesota's Clean Electricity by 2040 law, Minnesota utility planning requirements, and the State's adopted environmental-review framework.

The commenter identifies a different methodological approach based on current grid emission rates, but the comment does not identify an error in the calculations performed by the EQB Climate Calculator. The additional information provided above clarifies the specific emission factors, annual emissions trajectory, and annualization methodology used by the State-developed tool. Accordingly, no revisions to the AUAR's conclusions are warranted.