



ENVIRONMENTAL COMMISSION AGENDA

3RD FLOOR CONFERENCE
ROOM

MONDAY, JULY 28, 2025

6:00 PM

1. Call to Order
2. Approval of the Monday, July 28, 2025 Meeting Agenda
3. Approval of the Monday, June 23, 2025 Minutes
4. Items for Discussion / Action
 - A. Environmental Assessment Worksheet (EAW) for Archer Datacenters
 - B. Energy Action Plan Implementation Update
5. Commissioner Reports and Updates
6. Adjournment



ENVIRONMENTAL COMMISSION MINUTES

PUBLIC MEETING ROOM

MONDAY, JUNE 23, 2025

6:00 PM

Call to Order / Introductions

The Environmental Commission meeting was called to order by Chair Teresa DeMars at 6:05 PM. Commissioners in attendance include Teresa DeMars, Lee Nordmeyer, Richard Huston, and Ann Poe. Also in attendance include Environmental and Water Resource Coordinator – Adam King, Community and Economic Development Director – David Wanberg, and AmeriCorps at River Bend Nature Center – Nick Smoczyk.

Approval of the Monday, June 23, 2025, Agenda

Motion by Nordmeyer, seconded by Poe to approve the agenda as presented and carried unanimously.

Approval of the Thursday, May 29, 2024, Environmental Commission Meeting Minutes

Motion by Poe, seconded by Huston to approve the minutes of the Thursday, May 29, 2025, Environmental Commission Special Meeting and carried unanimously.

Items for Discussion / Action

Environmental Assessment Worksheet (EAW) for Archer Datacenters

King presented the comments received from the public comment period for the Archer Datacenters EAW. The commissioners discussed the comments. King reviewed the proposed timeline for the Archer Datacenters EAW, including having Archer Datacenters respond to the comments received and incorporate those responses into the final EAW by July 8th. The Development Review Committee (DRC) would review the final Archer Datacenters EAW at their July 15th meeting and notice for a public hearing at the Planning Commission meeting would go out by July 21st. The Environmental Commission would review and make a recommendation at the July 28th meeting. The Planning Commission would hold a public hearing at their August 4th meeting and make their recommendation. The City Council would consider the recommendations made from the Environmental Commission, Planning Commission, and comments from the public hearing to make a decision on the Archer Datacenters EAW. Wanberg provided input, additional details and clarification on the proposed timeline and EAW process for the commission. King stated that he will pass along the final Archer Datacenters EAW when it's received.

2025 Annual Workplan

King presented a summary of compiled 2025 priorities received from commissioners. The commissioners reviewed and discussed the summary and 2025 priorities. The commissioners proposed amendments to the workplan including removing #5: Implementing Adopt-A-Drain, removing #6: Implementing a Native Buffer on City Property Along the Cannon River Reservoir Above the Woolen Mill Dam until a decision is made on what is going to be done with the Woolen Mill Dam, and adding Implement the Energy Action Plan including promotion the energy assessment kits available at the library and River Bend Nature Center. A motion by Huston, seconded by Poe to adopt the 2025 Annual Workplan as amended and carried unanimously.

Clean Energy Resource Team (CERTs) Energy Assessment Kits at the Library and River Bend Nature Center

King provided an update on the CERTs Grant Energy Assessment Kits that are stationed at the library and River Bend Nature Center. King reported that the kit at the library has been checked out four times since March, and the kit at River Bend Nature Center has not been checked out, but the Girl Scouts have made a display for the kit.

River Bend Nature Center Update

Smoczyk provided an update on summer programing at the site, including the Lunch and Learn Series, Bagels and Birds, Storytime with a Naturalist, Little Sprouts, and the River Bend Ramble that will be held on August 09, 2025. Smoczyk informed the commissioners that an Outdoor Bill of Rights has been drafted, and that a new parcel that was previously a berry farm and orchard has been donated to River Bend Nature Center. Many of the berry plants have been donated and are still working out what to do with the trees.

Commissioner Reports and Updates

The commissioners provided reports and updates to projects they are working on.

Adjournment

Motion by Poe, seconded by Nordmeyer, to adjourn the Environmental Commission meeting and carried unanimously.

The meeting was adjourned at 7:04 PM.

Approved:	Date:	Recorder:
	06/23/2025	Adam King, Environmental and Water Resources Coordinator



Environmental Commission Memorandum

TO: Environmental Commission
THROUGH: David Wanberg, Community & Economic Development Director
FROM: Adam King, Environmental and Water Resource Coordinator
MEETING DATE: July 28, 2025
SUBJECT: Environmental Assessment Worksheet (EAW) for Archer Datacenters

Background:

The purpose of an EAW is to rapidly assess the environmental effects which may be associated with a proposed project, including aiding in the determination of whether an Environmental Impact Statement (EIS) is needed for a proposed project and to serve as a basis to begin the scoping process for an EIS (Chapter 4410.1000 Sub.1). The purpose of an EIS is to provide information for governmental units, the proposer of the project, and other persons to evaluate proposed projects which have the potential for significant environmental effects, to consider alternatives to the proposed projects, and to explore methods for reducing the adverse environmental effects (Chapter 4410.2000 sub.1). An EIS is mandatory in Faribault when a new or expansion industrial, commercial, or institutional facility of greater than 750,000 sq. ft., and is discretionary when the City and proposer of the project agree that an EIS should be prepared, or when the City determines that, based on the EAW and any comments or additional information received during the EAW comment period, the proposed project has the potential for significant environmental effects (Chapter 4410.2000 sub.2 & 3 A & B). The following shall be considered when determining if a project has significant environmental effects on climate, land cover/use, geology, soils, topography, water resources, contamination with hazardous materials/waste, fish/wildlife/plant communities/sensitive ecological resources, historic properties, visual, air, greenhouse gasses, noise, and transportation:

- Type of environmental effects
- Extent of environmental effects
- Reversibility of environmental effects
- Cumulative potential effects
 1. Whether the cumulative potential effect is significant;
 2. Whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect;

3. The degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect and;
 4. The efforts of the proposer to minimize the contributions from the project.
- The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority. The City may rely only on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project
 - The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer (Chapter 4410.2000 sub.7 A, B, C & D).

At the Thursday, May 29, 2025 Special Meeting the Environmental Commission reviewed the Archer Datacenters Faribault Campus project. City staff answered as many questions as possible and instructed the Environmental Commission to submit questions for Archer Datacenters to Davis prior to the Friday, June 20, 2025 comment deadline.

Comments on the Archer Datacenters Faribault Campus EAW were due to Harry Davis, City of Faribault Planning Manager, by Friday, June 20, 2025. Davis received 12 comment letters from 11 people/agencies and provided those comments to the Environmental Commission at the June 23, 2025 meeting. With the City required to make a decision whether the Archer Datacenters development will need an EIS within 30 days of after the close of the review comment period (July 20, 2025), and Archer Datacenters not responding to comments on the need for additional information, on July 17, 2025 the City has postponed the decision on the need for an EIS for an additional 30 days (August 19, 2025).

Archer Datacenters, though their consultant, Kimley Horn, have responded to all comments received, and the Findings of Fact and Conclusions incorporating the responses to comments are attached. The Environmental Commission will then review the Findings of Fact and Conclusions, and provide a recommendation to City Council.

Recommendation:

After reviewing the Archer Datacenters Environmental Assessment Worksheet (EAW), all comments received on the Archer Datacenters EAW, the responses to comments received, and the Findings of Fact and Conclusions incorporating the responses to comments, staff recommends that the Environmental Commission pass Resolution #ENV2025-01 approving the Findings of Fact and Record of Decision for Archer Datacenters Environmental Assessment Worksheet (EAW) and Negative

Declaration Concerning the Need for an Environmental Impact Statement (EIS).

Attachments:

1. ENV Resolution ENV2025-01 Approve Findings of Fact and Record of Decision for Archer Datacenters EAW and Negative Declaration Needing an EIS - KING ED
2. Faribault_Archer Datacenters - EIS Need Decision Extension
3. 2025-0716 - Archer Datacenters Faribault Site
4. Archer Datacenters Faribault Site_EAW Comment Responses
5. Faribault_EAW_FOFC_07-22-2025

CITY OF FARIBAUT ENVIRONMENTAL COMISSION

RESOLUTION #ENV2025-01

**APPROVING THE FINDINGS OF FACT AND RECORD OF DECISION FOR ARCHER
DATACENTERS ENVIRONMENTAL ASSESSMENT WORKSHEET (EAW) AND NEGATIVE
DECLARATION CONCERNING THE NEED FOR AN ENVIRONMENTAL IMPACT
STATEMENT (EIS)**

WHEREAS, the City of Faribault is the Responsible Governmental Unit (RGU) for the proposed Archer Datacenters development in the City of Faribault, Minnesota; and

WHEREAS, an Environmental Assessment Worksheet (EAW) is prepared for the proposed project in accordance with the Environmental Review Program of the Minnesota Environmental Quality Board (EQB) MN Rules Chapter 4410; and

WHEREAS, the City passed a resolution (Resolution 2025-122) declaring the EAW prepared for the proposed project complete; and

WHEREAS, on May 20, 2025, a notice and summary of the Archer Datacenters EAW was published in the EQB Monitor; and

WHEREAS, a public notice was published in the Faribault Daily News, a newspaper of general circulation in the project area within five working days of the EAW distribution; and

WHEREAS, copies of the EAW were distributed to people and agencies listed on the EQB Distribution List and made available to interested persons and provided to all requests as required; and

WHEREAS, the public comment period ran for 30 days to hear comments regarding the EAW prepared for the project and ended on June 20, 2025; and

WHEREAS, staff received comments by the end of day on June 20th, 2025, and shared them with the development team to incorporate into the final EAW document; and

WHEREAS, the project consultants and city staff have considered, evaluated, and incorporated changes to the EAW alongside generating a Response to Comments document; and

WHEREAS, the Archer Datacenters development does not meet or exceed the threshold of 750,000 Sq. Ft. for a mandatory Environmental Impact Statement (EIS); and

WHEREAS, the City and Archer Datacenter have not agreed that an EIS is needed and should be prepared; and

WHEREAS, the City has reviewed the EAW and the response to comments for significant environmental effects; and

WHEREAS, based upon the EAW and the response to comments, the Environmental Commission has considered the type, extent and reversibility of environmental effects, the cumulative potential effects including whether the cumulative potential effect is significant, whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect, the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect and the efforts of the proposer to minimize the contributions from the projects, the extent to which the environmental effects are subject to mitigation, and the extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken to determine if any environmental effects are significant; and

WHEREAS, based upon the EAW and the response to comments, the project does not have significant environmental effects with respect to climate; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to land use and land cover as the land is zoned for heavy industrial use; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to geology, soils, and topography/landforms; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to water resources as the development will be using the City of Faribault's water under

the City of Faribault's groundwater appropriation permit and not their own private well, and will be discharging water to the City of Faribault's sanitary sewer and not discharging water to surface waters, with the City having the capacity in both systems; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to contamination with hazardous materials or hazardous waste; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to fish, wildlife, plant communities and sensitive ecological resources (rare features) as the development will be using the City of Faribault's water and sanitary sewer not affecting the sensitive calcareous fens in the area; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to historical properties; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to visual aspects of the site; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to air quality; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to greenhouse gas emissions; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to noise; and

WHEREAS, based upon the EAW and the Response to Comments, the project does not have significant environmental effects with respect to transportation; and

WHEREAS, based upon the EAW and the Response to Comments, a Findings of Fact and Record of Decision document is prepared and attached; and

WHEREAS, on July 28, 2025, the Environmental Commission reviewed the EAW and Findings of Fact and Record of Decision documents; and

NOW, THEREFORE BE IT RESOLVED BY THE ENVIRONMENTAL COMMISSION OF THE CITY OF FARIBAULT AS FOLLOWS:

Section 1. Findings. The recitals and exhibits are incorporated, and where applicable, constitute the Environmental Commission's findings.

Section 2. Findings of Fact and Record of Decision. The Findings of Fact and Record of Decision, attached as Exhibit A, are hereby approved.

Section 3. Determination of Significant Environmental Impacts and Need for an EIS. The Archer Datacenters development as described in the EAW does not have potential for significant environmental impacts. An Environmental Impact Statement will not be required for the Archer Datacenters development as defined in the EAW.

Section 4. Changes to the Project Area. When the land use, intensity, or impacts differ from the proposed land use or a different land use from what is being proposed, an updated or new EAW may be required prior to the project moving forward.

Commented [HD1]: Ask WSB for assistance on protection in case the project falls through

(Remainder of this page intentionally left blank)

Section 4. Effective Date. This recommendation shall be effective immediately upon its passage and without publication according to the Faribault City Charter.

Date Adopted: July 28, 2025

Faribault Environmental Commission

Teresa DeMars, Chair

ATTEST:

**Adam King, Environmental and Water
Resources Coordinator**

Exhibit A
Findings of Fact and Record of Decision, Environmental Assessment
Worksheet for Archer Datacenters

*(Insert Findings of Fact and Record of Decision, and EAW, documents after
this page)*



Memorandum

To: Jordan Milman, Archer Datacenters
Jesse Krzenski, Environmental Quality Board
Chris Green, Minnesota Pollution Control Agency
Haley Byron, Department of Natural Resources
Commenters During the Public Comment Period

From: Harry Davis, City of Faribault

Date: 7/16/25

Re: Archer Datacenters EIS Need Decision Extension

The comment review period for Archer Datacenters EAW concluded on June 20, 2025. Based on the comments received, it has been determined by the City of Faribault that additional data is needed to provide a reasoned decision on the need for an Environmental Impact Statement. In order to complete this review and make a reasoned decision, the proposer must submit the following:

- Information related to potential emissions, including emissions from either diesel or natural gas power generation. This information must be provided to assess the potential for air quality impacts and confirm that the project does not trigger the mandatory EAW category for air pollution.
- Information related to current and anticipated sound levels in the project area.
- Information related to the projected water demand and wastewater generation potential from the proposed project, including the cumulative effect when combined with other facilities in the vicinity of the project area.

Per Mn Rule 441.1700 Subpt 2a(B) the City will extend the EIS need decision for an additional 30 days, through August 20, 2025. During this extended decision timeframe, the city will review additional information provided by the project proposer related to the above-noted resources.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Harry Davis
City Planning Manager
(507) 333-0388
hdavis@faribaultmn.gov

Archer Datacenters Faribault Campus

Environmental Assessment Worksheet

Revised ~~June~~ July 2025

Prepared for:



ARCHER
DATACENTERS

Prepared by:

Kimley»Horn

Table of Contents

1. Project Title.....	1
2. Proposer	1
3. RGU	1
4. Reason for EAW Preparation	2
5. Project Location.....	2
6. Project Description.....	2
7. Climate Adaption and Resilience.....	4
8. Cover Types.....	8
9. Permits and Approvals Required	9
10. Land Use	9
11. Geology, Soils, and Topography/Landforms.....	11
12. Water Resources	12
13. Contamination/Hazardous Materials/Wastes	16
14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features).....	18
15. Historic Properties.....	20
16. Visual.....	20
17. Air	20
18. Greenhouse Gas (GHG) Emissions/Carbon Footprint	21
19. Noise	26
20. Transportation	27
21. Cumulative Potential Effects	30
22. Other Potential Environmental Effects	30

List of Tables

Table 1: Project Magnitude.....	3
Table 2: Climate Considerations and Adaptations.....	6
Table 3: Cover Types.....	8
Table 4: Green Infrastructure.....	8
Table 5: Trees.....	8
Table 6: Permits and Approvals Required	9
Table 7: What's in My Neighborhood Sites	16
Table 8: Construction Emissions.....	22
Table 9: Operational Emissions.....	23
Table 10: Project Trip Generation	27
Table 11: Existing and Projected Intersection LOS.....	27

List of Figures

Figure 1: County Map	33
Figure 2: USGS Map.....	34
Figure 3: Existing Conditions	35
Figure 4: Cover Types	36
Figure 5: Existing Land Use.....	37
Figure 6: Future Land Use	38
Figure 7: Existing Zoning	39
Figure 8: Soil Types.....	40
Figure 9: Surface Water Resources.....	41
Figure 10: Groundwater Resources	42
Figure 11: Delineation Summary	43
Figure 12: MPCA What's in My Neighborhood	44

List of Appendices

Appendix A: Concept Site Plan
Appendix B: Wetland Delineation Report
Appendix C: Greenhouse Gas Analysis
Appendix D: Traffic Study
Appendix E: Sanitary Sewer Extension

Environmental Assessment Worksheet

This most recent Environmental Assessment Worksheet (EAW) form and guidance documents are available at the Environmental Quality Board's (EQB's) website at: <https://www.eqb.state.mn.us>. The EAW form provides information about a project that may have the potential for significant environmental effects. Guidance documents provide additional detail and links to resources for completing the EAW form.

Cumulative potential effects can either be addressed under each applicable EAW Item or can be addressed collectively under EAW Item 21.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the EAW in the *EQB Monitor*. Comments should address the accuracy and completeness of information, potential impacts that warrant further investigation, and the need for an EIS.

1. Project Title

Archer Datacenters Faribault Campus

2. Proposer

Proposer: Archer Datacenters

Contact Person: Jordan Milman

Title: Chief Executive Officer

Address: 60 Hights Cross Road

City, State, ZIP: Chappaqua, NY 10514

Email: jordan.milman@archerdatacenters.com

3. RGU

RGU: City of Faribault

Contact Person: Harry Davis

Title: Planning Manager

Address: 208 1st Ave. NW

City, State, ZIP: Faribault, MN 55021

Phone: 507-333-0374

Email: hdavis@ci.faribault.mn.us

4. Reason for EAW Preparation

Check one:

Required:

☐ EIS Scoping

☒ Mandatory EAW

Discretionary:

☐ Citizen petition

☐ RGU discretion

☐ Proposer initiated

If EAW or EIS is mandatory, give EQB rule category subpart number(s) and name(s):

5. Project Location

County: Rice

City/Township: Faribault

PLS Location (1/4, 1/4, Section, Township, Range): Section 1, Township 110N, and Range 21W

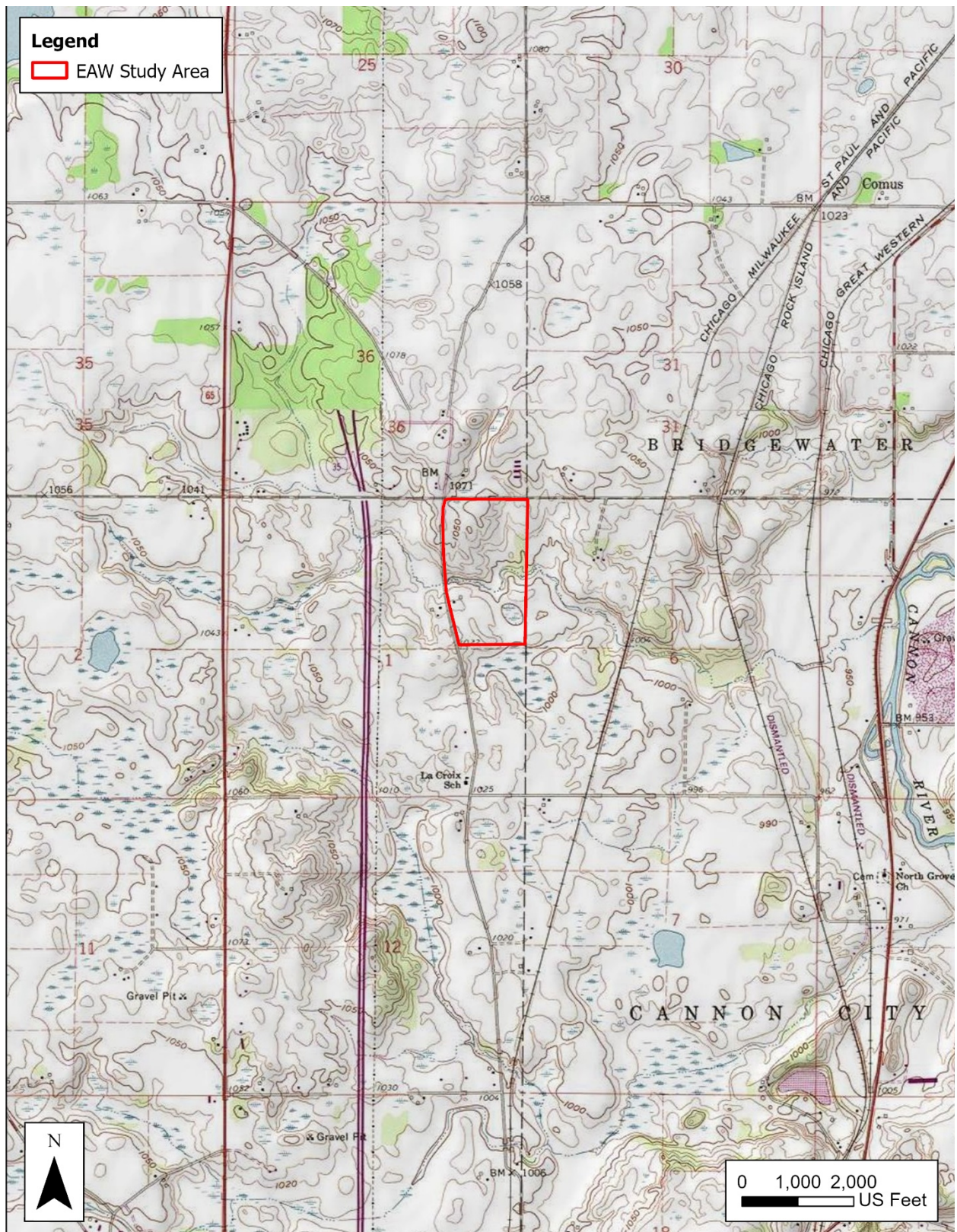
Watershed (81 major watershed scale): Cannon River

GPS Coordinates: 44.3668918 N. -93.2899289 W

Tax Parcel Number: 1801100033

At a minimum, attach each of the following to the EAW:

- **County map showing the general location of the project** (see Figure 1)
- **US Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries** (see
- **Figure 2: USGS Map**



- **Site plans showing all significant project and natural features. Pre-construction site plan and post-construction site plan.** (see Figure 2 and Appendix A)
- **List of data sources, models, and other resources (from the Item-by-Item Guidance: *Climate Adaptation and Resilience* or other) used for information about current Minnesota climate trends and how climate change is anticipated to affect the general location of the project during the life of the project** (as detailed below in Items 7 and 18).

6. Project Description

- Provide the brief project summary to be published in the *EQB Monitor* (approximately 50 words).**

The Archer Datacenters Faribault Campus project is south of 150th Street West and east of Acorn Trail in Faribault, Rice County, MN. The site consists of one parcel of approximately 84.3 acres of agricultural and undeveloped woodland.

Archer Datacenters proposes to develop the study area from existing agriculture to up to 500,000 square feet of data center buildings with associated utilities and parking lot.

- Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion, include a description of the existing facility. Emphasize 1) construction and operation methods and features that will cause physical manipulation of the environment or will produce wastes; 2) modifications to existing equipment or industrial processes; 3) significant demolition, removal, or remodeling of existing structures; and 4) timing and duration of construction activities.**

The Archer Datacenters Faribault Campus project is south of 150th Street West and east of Acorn Trail in Faribault, Rice County, MN (See Figure 1). The site consists of one parcel and approximately 84.3 acres of farmstead, agricultural and undeveloped woodland.

The proposed project includes removal of the existing farmstead and construction of up to 500,000 square feet of new one-story data center buildings with associated parking and landscape improvements and one substation. Up to six data center buildings will be constructed.

The proposed site requires City of Faribault public water and sanitary line extensions in Acorn Trail and will use directional drilling during construction to minimize environmental impacts.

Onsite infrastructure improvements include sanitary sewer, water lines, storm sewer, three stormwater ponds, and electric lines. Two secured entries will be installed along Acorn Trail to access the site. Minimally invasive construction techniques will be used to minimize environmental impacts.

Construction is expected to begin in the summer of 2025 and is anticipated to take up to three construction seasons to complete.

c. Project magnitude

Table 1: Project Magnitude

Measure	Magnitude
Total Project Acreage	84.3
Commercial Building Area (square feet)	500,000
Structure Height(s)	31.5'

- d. **Explain the project purpose. If the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.**

The project purpose is to construct up to six data center buildings to house computer systems and associated components, such as servers, telecommunications and storage systems for the computation, storage, and management of data.

- e. **Are future stages of this development, including development on any other property, planned or likely to happen?** ☐ Yes ☒ No

If yes, briefly describe future stages, relationship to present project, timeline, and plans for environmental review.

- f. **Is this project a subsequent stage of an earlier project?** ☐ Yes ☒ No

If yes, briefly describe the past development, timeline, and past environmental review.

Not applicable.

7. Climate Adaption and Resilience

- a. **Describe the climate trends in the general location of the project (see guidance: *Climate Adaptation and Resilience*) and how climate change is anticipated to affect that location during the life of the project.**

Trends in temperature, precipitation, flood risk, and cooling degree days are described below for the general project location. Some of the climate projections summarized below use Representative Concentration Pathways (RCPs), which are greenhouse gas concentration [scenarios-scenario](#) used by the Intergovernmental Panel on Climate Change. RCP 4.5 is an intermediate scenario in which emissions decline after peaking around 2040, and RCP 8.5 is a worst-case scenario in which emissions continue to rise through the 21st century.¹

Temperature

According to the Minnesota Climate Explorer,² the historical average temperature in Rice County between 2001-2021 was approximately 45.3°F, with the lowest average in 2014 (41.49°F) and the highest average in 2012 (48.85°F). The average annual temperature in Rice County is projected to be 48.32°F from 2040-2059 under RCP 4.5. In 2080-2099, average annual temperature is projected to be 50.72°F and 54.41°F under RCP 4.5 and 8.5, respectively.

¹ Climate Explorer Metadata. Available at <https://www.dnr.state.mn.us/climate/climate-explorer-metadata.html>.

² Minnesota Climate Explorer. Minnesota Department of Natural Resources.

Precipitation

According to the Minnesota Climate Explorer, historic average precipitation in Rice County between 2001-2021 was approximately 32.52 inches, with the lowest average in 2003 (22.92 inches) and the highest average in 2019 (48.64 inches). Average annual precipitation in Rice County from 2040-2059 is projected to be 32.56 inches under RCP 4.5. From 2080-2099, average annual precipitation is projected to be 32.85 inches under RCP 4.5 and 35.44 inches under RCP 8.5.

Flood Risk

According to Flood Factor,³ a tool that identifies a property's risk of flooding, there is a 0 percent chance that 0.5 feet of water will reach the largest building on the Archer Datacenters Faribault Campus due to flooding in 2025. In 15 years (2040) and 30 years (2055), the depth of flooding increases nominally, with a 0 percent chance that 4 feet of water will reach the largest building on campus. In all three years (2025, 2040, and 2055), under the 5 percent flood likelihood scenario, the depth of flooding is 0 feet.⁴

Cooling Degree Days

As defined by the National Weather Service, degree days are based on the assumption that when the outside temperature is 65°F, heating or cooling is not needed to be comfortable. Degree days are the difference between the daily temperature mean and 65°F. If the temperature mean is above 65°F, 65 is subtracted from the mean and the result is the cooling degree days. For example, if the mean temperature over a 24-hour period is 70°F, then there have been 5 cooling degree days.⁵ Cooling degree days are used as a proxy to estimate cooling needs for buildings.

According to Heat Vulnerability in Minnesota,⁶ the number of cooling degree days in 2019 for Rice County was 423. The number of cooling days in 2050 for Rice County is projected to be 502 and 650 for RCP 4.5 and 8.5, respectively.

- b. For each resource category in the table below, describe the project's proposed activities and how the project's design will interact with those climate trends. Describe proposed adaptations to address the project effects identified.**

³ Flood Factor. Available at <https://www.floodfactor.com/>. Values are based off assumed/researched design rainfall capacity. Hydrography was generated by the National Elevation Dataset and the National Hydrography Dataset. Flood adaptation structures (levees, dams, etc.) were included in the modeling process. See full technical documentation for additional information: https://assets.firststreet.org/uploads/2020/06/FSF_Flood_Model_Technical_Documentation.pdf

⁴ Flood Factor assumes a rainfall capacity allowance in urban areas, and thus may not accurately represent carrying capacity on site. Flood Factor also may not account for adaptation infrastructure, which would reduce flooding.

⁵ "What Are Heating and Cooling Degree Days." National Weather Service. Available at https://www.weather.gov/key/climate_heat_cool.

⁶ Heat Vulnerability in Minnesota. Minnesota Department of Health and the University of Minnesota. Available at https://maps.umn.edu/climatehealthtool/heat_app/.

Climate considerations and adaptations for the proposed project are described in Table 2.

DRAFT

Table 2: Climate Considerations and Adaptations

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
Project Design	For example, aspects of the building architecture/materials choices and site design that may negatively affect urban heat island conditions in the area considering changing climate zones, temperature trends, and potential for extended heat waves	In the coming decades, the location of the study area is anticipated to experience: • Increased annual temperatures • Increased annual precipitation and more frequent heavy rainfall events • Increased freeze thaw cycles	• Energy end-use efficient appliances and equipment and energy efficient lighting may be incorporated into building design. • Energy efficient data center cooling technology, namely non-evaporative air-cooled primary-loop heat-rejection and secondary closed-loop liquid cooling may be considered based on tenant specifications. • If feasible, implementation of onsite wind power is expected to be incorporated into the project. • Energy efficient building shells may be considered. • Proposed native trees and landscaping that reduce runoff and mitigate heat island effect may be included in design. • Parking areas may be evaluated to potentially reduce impervious areas within the EAW Study Area. • Water efficient design may be incorporated in landscaping.

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
Land Use	For example, any critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those with housing occupants who may be insufficiently mobile) that are proposed in floodplain areas and other areas identified as at risk for localized flooding; describe the risk potential considering changing precipitation and event intensity	Portions of the proposed development may experience flooding during extreme rain events.	If feasible, design of the site and stormwater management facilities will be completed to reduce the risk of flooding in the EAW study area. Filtration areas may be used to improve water quality and stormwater runoff in the project vicinity.
Water Resources	Addressed in Item 12	Addressed in Item 12	Addressed in Item 12
Contamination/ Hazardous Materials/ Wastes	For example, how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the potential environmental effects of generation/ use/storage of hazardous waste and materials	The proposed development is not anticipated to generate hazardous waste or materials.	Not Applicable
Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)	Current Minnesota climate trends and anticipated climate change in the general location of the project may influence the local species and suitable habitat.	Suitable habitat for species may become unsuitable due to land use changes, increased temperature, and increased runoff	The project will consider incorporating climate-appropriate native plantings and stormwater BMPs will provide suitable habitat for small mammals, insects, and bird species.

8. Cover Types

Estimate the acreage of the site with each of the following cover types before and after development.

Estimated cover type acreages before and after development are provided in Table 3, with additional information on green infrastructure and trees in Table 4 and Table 5, respectively.

Figure 4 provides an overview of the existing cover types onsite.

Table 3: Cover Types

Cover Type	Before (Acres)	After (Acres)
Wetlands and Shallow Lakes (less than 2 meters deep)	2.9	2.1
Deep Lakes (more than 2 meters deep)	0	0
Rivers/Streams	2.4	2.4
Wooded/Forest	26.6	18.3
Brush/Grassland	0	0
Cropland	49.5	0
Livestock Rangeland/Pastureland	0	0
Lawn/Landscaping	2	9.3
Green Infrastructure (total from Table 4)	0	5
Impervious Surface	0.9	42.2
Stormwater Pond (wet sedimentation basin)	0	5
Other (describe)	0	0
Total	84.3	84.3

Table 4: Green Infrastructure

Green Infrastructure	Before (Acres)	After (Acres)
Constructed Infiltration Systems (infiltration basins, infiltration trenches, rainwater gardens, bioretention areas without underdrains, swales with impermeable check dams)	0	5
Constructed Tree Trenches and Tree Boxes	0	0
Constructed Wetlands	0	0
Constructed Green Roofs	0	0
Constructed Permeable Pavements	0	0
Other (describe)	0	0
Total	0	5

Table 5: Trees

Trees	Percent	Number
Percent Tree Canopy Removed or Number of Mature Trees Removed During Development	31%	8.3 acres
Number of New Trees Planted	66% of required base plantings	169 trees

9. Permits and Approvals Required

List all known local, state, and federal permits, approvals, certifications, and financial assistance for the project. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing, and infrastructure. *All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules Chapter 4410.3100.*

Table 6: Permits and Approvals Required

Unit of Government	Type of Application	Status
Federal	U.S. Army Corps of Engineers (USACE) Section 404 Delineation Concurrence	Approved
State of Minnesota	MN DLI Onsite Plumbing Permit	Approved
	Minnesota Pollution Control Agency (MPCA) Sanitary Sewer Extension	To be applied for
	MPCA Construction Contingency Plan and Response Action Plan approval	To be applied for, if applicable
	MPCA Section 401 Certification	To be applied for, if applicable
	Minnesota Department of Natural Resources Temporary Water Appropriation Permit for Construction Dewatering	To be applied for, if applicable
	Minnesota Department of Health Watermain Installation Permit	To be applied for
	MPCA NPDES	To be applied for
	MPCA Air Registration Permit	To be applied for
	Minnesota Department of Natural Resources No-Effect Concurrence Determination	To be applied for
City of Faribault	Preliminary Plat	To be applied for
	Final Plat	To be applied for
	Mass Grading	To be applied for
	Site Plan Review	To be applied for
	Building Permit	To be applied for
Rice County	Work in ROW	To be applied for
	Soil and Water Conservation District (SWCD) Wetland Conservation Act Permit	To be applied for
	Utility Permit	To be applied for
	Driveway Permit	To be applied for

10. Land Use

a. Describe:

- i. **Existing land use of the site as well as areas adjacent to and near the site, including parks and open space, cemeteries, trails, and prime or unique farmlands.**

The 84.3-acre site includes one parcel and consists of primarily agricultural uses. There is a residential property and approximately 26 acres of forested area onsite. The site is generally bounded by Acorn Trail to the west, and 150th Street West to the north.

The site is surrounded by residential properties, agricultural ~~land, and land~~, industrial office space, and institutional businesses (see Figure 5). There is an unnamed stream that bisects the site flowing west to east. No cemeteries or prime or unique farmland are located within or adjacent to the site.

- ii. **Planned land use as identified in comprehensive plans (if available) and any other applicable plan for land use, water, or resource management by a local, regional, state, or federal agency.**

The future land use guidance laid out by the City of Faribault in the 2040 Comprehensive plan has the site designated for Industrial use (see Figure 6). The City describes this land use as land containing manufacturing, transportation, construction companies, communications, utilities, or wholesale trade. This category also includes publicly owned industrial lands, such as wastewater treatment plants and water towers. It also includes warehouses and salvage yards.

- iii. **Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.**

Current Zoning

The zoning classification of the site is I-2 Heavy Industrial (see Figure 7). The City of Faribault describes I-2 districts as districts established to provide an environment of very heavy industrial uses that allows for manufacturing, warehousing, and other industrial uses.

FEMA National Flood Hazard

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) was reviewed for the project study area. According to the FEMA, FIRM, the study area is located in Zone X of panel 27131C0260D (effective April 03, 2012), which is outside the designated 100-year floodplain zones.

Shoreland

The development is not located within shoreland zone.

- iv. **If any critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those housing occupants who may be**

insufficiently mobile) are proposed in floodplain areas and other areas identified as at risk for localized flooding, describe the risk potential considering changing precipitation and event intensity.

The site is not located within a Federal Emergency Management Agency (FEMA) 100-year floodplain. Risk of localized flooding is described as part of the climate trend analysis summarized under Item 7. The site has a low risk of localized flooding.

b. Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 10a above, concentrating on implications for environmental effects.

Existing nearby land uses include residential properties, agricultural land, and additional Industrial properties. The project is compatible with the planned land use and zoning as outlined in the City of Faribault's 2040 plan for the site and adjacent areas.

c. Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 10b above and any risk potential.

The proposed development meets all land use and zoning requirements as outlined above.

11. Geology, Soils, and Topography/Landforms

a. Geology – Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.

According to the Minnesota Geologic Survey of Rice County (Part A) (1995), bedrock geology of the site consists of the Prairie du Chien Group, which consists of thin- to medium- bedded, yellowish-gray dolostone with interbeds of quartzose sandstone and shale. The estimated depth to bedrock is approximately 50 to 150 feet below grade. The surficial geology consists of loam, with sandy loam, sand, and gravel occasionally present.

No sinkholes, unconfined/shallow aquifers, or karst conditions were identified on the site.

b. Soils and Topography – Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability, or other soil limitations, such as steep slopes or highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections, or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 12.b.ii.

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (see Figure 8.), there are ten soil units within the site:

- Hayden loam, 2 to 6 percent slopes, 16.6 acres, hydric Rating of 5

- Hayden loam, 6 to 10 percent slopes, moderately eroded, 33.9 acres, hydric rating of 5
- Hayden loam, 10 to 22 percent slopes, moderately eroded, 5 acres, hydric rating of 8
- Glencoe clay loam, 0 to 1 percent slopes, 3.9 acres, hydric rating of 100
- Hamel loam, 0 to 2 percent slopes, 9.7 acres, hydric rating of 90
- Hawick-Estherville complex, 6 to 12 percent slopes, 3.1 acres, hydric rating of 0
- Klossner, Okoboji and Glencoe soils, ponded, 0 to 1 percent slopes, 0.4 acres, hydric rating of 100
- Le Sueur loam, moderately coarse substratum, 1 to 3 percent slopes, 3.4 acres, hydric rating of 0
- Klossner muck, 0 to 1 percent slopes, 1.6 acres, hydric rating of 100
- Colo silt loam, channeled, 0 to 2 percent slopes, frequently flooded, 7.1 acres, hydric rating of 95

The soil types within the study area are rated from slight to moderate erosion hazard. Disturbed soil and fill are often compacted and more susceptible to erosion. Soil erosion will be mitigated with sediment and erosional control BMPs.

Topography within the site varies from 992 feet in elevation in the eastern-central portion of the site to 1066 feet in elevation in the northwestern portion of the site. The site generally drains into the stream in the central portion of the study area and continues east.

The proposed project will require approximately 93,000 cubic yards of earthwork onsite. An NPDES permit is required because the project will disturb more than 1 acre of land. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared. All unpaved areas disturbed during construction will be revegetated in accordance with the standard NPDES permit requirements. In areas with steep slopes, special consideration will be given to prevent erosion during construction, such as erosion control blankets, along with vegetation establishment to permanently stabilize side slopes and any areas impacted as a result of construction.

12. Water Resources

a. Describe surface water and groundwater features on or near the site below.

- Surface Water – lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, shoreland classification and floodplain/floodway, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include the presence of aquatic invasive species and the water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.**

Kimley-Horn completed a wetland delineation on August 13, 2024, and identified ten wetlands within the study area (see Figure 11). A formal delineation approval was issued with a notice of decision from the City of Faribault on December 17, 2024. The two intermittent streams are located in the northeast and center of the project area.

An ephemeral stream is located in the northeast portion of the project area. One roadside ditch is located on the northern edge of the project area, and one roadside ditch is located along Acorn Trail on the west side of the project area.

According to the MPCA's 2024 Impaired Waters Map, no impaired waters are identified within one mile of the project area (see Figure 9). According to the MnDNR's Public Water Inventory, no public waterways or waterbodies are identified within the project area.

- ii. **Groundwater – aquifers, springs, and seeps. Include 1) depth to groundwater; 2) if project is within a MDH wellhead protection area; and 3) identification of any onsite and/or nearby wells, including unique numbers and well logs, if available. If there are no wells known on site or nearby, explain the methodology used to determine this.**

Historic well data for properties adjacent to the site indicate groundwater is 50-95 feet below the existing surface elevation. Soil borings performed on the southern half of the project area encountered groundwater 8-43 feet below the existing ground surface. The project area is not within an MDH wellhead protection area. An onsite survey of the property identified one domestic water well, but it is not documented in the Minnesota Well Index (see Figure 10). The well will be capped and removed per state requirements.

b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects below.

- i. **Wastewater – For each of the following, describe the sources, quantities, and composition of all sanitary, municipal/domestic, and industrial wastewaters projected or treated at the site.**

- 1) **If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.**

The wastewater will be discharged through the public sanitary sewer system and to a publicly owned treatment facility. A 10" sanitary sewer extension of +/-0.60 miles in Acorn Trail is required ([See Appendix E](#)). The City of Faribault's comprehensive sanitary sewer plan indicates a 24" trunk sanitary sewer line through the site. The future sanitary trunk main and associated public lift station is several years from undergoing development and not anticipated to be complete to serve the development. In discussions with City staff, it was recommended to serve the site through the existing sanitary forcemain south of the site within Acorn Trail. The development will be in communication with the City throughout the design process of the campus to determine when the new trunk sanitary sewer will be installed and utilized. No pretreatment measures are anticipated to be needed. The City's 2040 comprehensive plan notes the water and wastewater treatment plant have capacity to serve the current and anticipated needs of the community through the year 2040.

Energy & water efficient data center cooling technology, namely non-evaporative air-cooled primary-loop heat-rejection and secondary closed-loop liquid cooling is the prevailing design for the data center campus. However, certain end users may require supplemental evaporative, ~~or also known as~~ adiabatic-assisted cooling technologies, which may increase wastewater discharge for HVAC purposes. This document details the range of potential wastewater discharge for the non-evaporative case and the supplemental evaporative (adiabatic-assisted) case. The project is anticipated to have a daily domestic sewer discharge of approximately 13,000 GPD. sewer discharge of 4.9M gallons with an anticipated average day demand of approximately 13,500 GPD. The non-evaporative cooling technology is anticipated to discharge minimal industrial wastewater to the sewer system, nearly 0 GPD during normal operations. If an adiabatic system is utilized, the campus is anticipated to discharge approximately 3,550 GPD and 1.3 million GPY on average average day and annual discharge of 1,295,750 gallons, with a peak day discharge of approximately 22,900 GPD and peak hourly flow of 4,350 gallons. The anticipated max day discharge for the adiabatic-assisted cooling technology use is 30,000 GPD and max hourly flow of 3,500 gallons. This is anticipated to be the peak discharge seen for the development utilizing the adiabatic cooling system technology. If non-evaporative air-cooled technology is utilized, the campus is anticipated to discharge only domestic sewage at a rate of approximately 13,000 GPD. A summary of the anticipated approximate wastewater demands for the development are provided in the table below.

In discussions with the City, the treatment facility is anticipated to have capacity for this wastewater and will not require an expansion of the treatment facility. If wastewater associated with cooling technologies is discharged to the municipal sanitary sewer system, additional water quality and quantity parameters will be provided to the City in accordance with the Significant Industrial User (SIU) permit as to not adversely affect the Publicly Owned Treatment Works (POTWs) permit.

<u>Sewer Discharge (GPD)</u>	<u>Domestic</u>	<u>Non-Evaporative Cooling System*</u>	<u>Supplemental Evaporative (Adiabatic)*</u>
<u>Daily Average</u>	<u>13,000</u>	<u>Nearly 0 GPD</u>	<u>3,550</u>
<u>Peak Hour</u>	<u>N/A</u>	<u>N/A</u>	<u>4,350</u>
<u>Peak Day</u>	<u>N/A</u>	<u>N/A</u>	<u>22,900</u>
<u>Annual Average</u>	<u>4,745,000</u>	<u>Nearly 0 Gallons</u>	<u>1,295,750</u>

*Only one of these cooling systems will be implemented

- 2) **If the wastewater discharge is to a subsurface sewage treatment system (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system. If septic systems are part of the project, describe the availability of septage disposal options within the region to handle the ongoing amounts generated as a result of the project. Consider**

the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion.

Not applicable.

- 3) If the wastewater discharge is to surface water, identify the wastewater treatment methods and identify discharge points and proposed effluent limitations to mitigate impacts. Discuss any effects to surface or groundwater from wastewater discharges, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects.

Not applicable.

- ii. **Stormwater – Describe changes in surface hydrology resulting from change of land cover. Describe the routes and receiving water bodies for runoff from the project site (major downstream water bodies as well as the immediate receiving waters). Discuss environmental effects from stormwater discharges on receiving waters post-construction, including how the project will affect runoff volume, discharge rate, and change in pollutants. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion. For projects requiring NPDES/SDS Construction Stormwater permit coverage, state the total number of acres that will be disturbed by the project and describe the stormwater pollution prevention plan (SWPPP), including specific best management practices to address soil erosion and sedimentation during and after project construction. Discuss permanent stormwater management plans, including methods of achieving volume reduction to restore or maintain the natural hydrology of the site using green infrastructure practices or other stormwater management practices. Identify any receiving waters that have construction-related water impairments or are classified as special as defined in the Construction Stormwater permit. Describe additional requirements for special and/or impaired waters.**

Currently the site generally drains to the streams in the middle and northeast areas with no existing BMPs in place to capture stormwater runoff. The streams flow into the Cannon River +/-1.3 miles to the east.

The proposed project includes stormwater management and treatment of stormwater runoff within the site. Filtration and storage basins will be sized per state and local requirements for the increase in impervious areas and anticipated changes in rainfall. The City's stormwater management design standards require 1" over the new or fully reconstructed impervious surface area; the site is anticipated to require approximately 153,000 cubic feet (cf) of treatment volume for the 42.11 acres of impervious surface coverage. The proposed outlet control structures in each of the basins will be designed to discharge at a rate less than the existing condition. The site is anticipated to have primarily clay soils throughout the development; therefore, infiltration is likely not a feasible alternative for development. If geotechnical investigation uncovers the inability to infiltrate, filtration basins will be utilized to

provide stormwater treatment prior to discharge from the site. The three stormwater management basins will attenuate flow as to not increase discharge from the site in post-development conditions when compared to pre-development conditions.

The stormwater will be treated according to the published MPCA guidelines and City of Faribault requirements. The three basins are proposed to filter stormwater runoff from the site prior to discharge to the intermittent stream in the middle of the site and eventually to the Cannon River. The project is expected to disturb approximately 50 acres and will require a SWPPP which will be compliant with all MPCA General Construction Stormwater and City of Faribault standards. The total disturbed area is pending final development plans and subject to change. Erosion control BMPs will be utilized and may consist of inlet protection, silt fence, bioroll, diversion swales, rock check dams, sediment basins, and designated construction entrances.

- iii. **Water Appropriation – Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use, and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or quality, such as reuse of water, connections with another water source, or emergency connections.**

Permanent dewatering is not expected as a part of this project. Temporary construction dewatering may be required for the project. Any temporary dewatering will require a DNR Temporary Water Appropriations General Permit if less than 50 million gallons per year and less than one year in duration. It is anticipated dewatering would only occur during utility installation and potential construction of building footings.

In addition to the well identified through the onsite survey, if unidentified wells are found during construction, the MPCA and MDH must be contacted to determine the course of action, which may include sealing, relocating or preserving by a licensed well contractor according to the Minnesota Rules Chapter 4725.

The project will connect to the City of Faribault's water system. A 12" water main extension of +/-0.30 miles in Acorn Trail is required. The City's water treatment plant is designed to operate at 7 MGD and maximum pumping capacity of 10 MGD with a current total use of approximately 4-6 MGD. The [Citycity](#) also recently installed a water tower roughly ½ mile southwest of the site, providing adequate pressure to the site. Additional City infrastructure upgrades beyond a watermain extension are

not anticipated to be needed and the project is not expected to have a significant adverse impact on the City's water supply or system. Surface water and groundwater appropriation is not proposed as part of this development as the development will utilize city water services.

Energy & water efficient data center cooling technology, namely non-evaporative air-cooled primary-loop heat-rejection and secondary closed-loop liquid cooling is the prevailing design for the data center campus. However, certain end users may require supplemental evaporative, ~~also known as or~~ adiabatic-assisted cooling technologies, which may increase domestic water utilization for HVAC purposes. This document details the range of potential water utilization for the non-evaporative case and the supplemental evaporative case. The project is anticipated to have a daily domestic water demand of approximately 13,000 GPD. The non-evaporative cooling technology is anticipated to utilize minimal water for industrial purposes, nearly 0 GPD during normal operations. If an adiabatic (supplemental evaporative) system is utilized, the campus is anticipated to have an approximately utilize approximately 41,000 GPD average day demand and annual usage of and approximately 15 million 14,965,000 gallons GPY, with a peak day -day demand of approximately 254,000 gallons GPD and peak hourly demand of 48,140 gallons. The max day demand is not anticipated to be seen frequently throughout the year. A summary of the anticipated approximate water demands for the development are provided in the table below.

~~The project is anticipated to have a maximum day demand of 16,500 GPD and annual water usage of 4.8M GPY. The anticipated max day demand is approximately 280,000 GPD, which would operate at a time when the cooling system is operating at peak; the max day demand is not anticipated to be seen frequently throughout the year. If non-evaporative air-cooled technology is utilized, the campus is anticipated to only have domestic water demands at an estimated rate of approximately 13,000 GPD.~~

<u>Water Usage (GPD)</u>	<u>Domestic</u>	<u>Non-Evaporative Cooling System*</u>	<u>Supplemental Evaporative (Adiabatic)*</u>
<u>Daily Average</u>	<u>13,000</u>	<u>Nearly 0 GPD</u>	<u>41,000</u>
<u>Peak Hour</u>	<u>N/A</u>	<u>N/A</u>	<u>48,140</u>
<u>Peak Day</u>	<u>N/A</u>	<u>N/A</u>	<u>254,000</u>
<u>Annual Average</u>	<u>4,745,000</u>	<u>Nearly 0 Gallons</u>	<u>14,965,000</u>

*Only one of these cooling systems will be implemented

iv. Surface Waters

- 1) **Wetlands – Describe any anticipated physical effects or alterations to wetland features, such as draining, filling, permanent inundation, dredging, and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed, taking into consideration how current Minnesota climate trends and**

anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts will occur in the same minor or major watershed and identify those probable locations.

The project is anticipated to fill ~~up to~~ ± 0.8 acres of wetlands 4,5,7,8, and 9. Measures to limit and avoid additional wetland impacts include retaining walls and adjustment of proposed building locations. Wetland 6 may undergo temporary impacts for the installation of the public utilities extension; permanent impacts to this wetland will be minimized to the maximum extent practicable. Stormwater BMPs are strategically located throughout the site to provide the necessary detention and treatment for the site prior to discharge offsite while minimizing impacts to existing wetlands to maximum extent practicable. Unavoidable wetland impacts will be reviewed by the Wetland Conservation Act (WCA) Local Governing Unit (LGU) in accordance with the WCA and will be mitigated with wetland bank credits in the same bank service area as the project. The USACE has reviewed the wetland boundaries and determined that it does not have jurisdiction over the wetlands onsite.

- 2) **Other surface waters – Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal, and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.**

No impacts are anticipated. Mitigation measures such as double row silt fence and sedimentation traps or basins are proposed during construction. Permanent stormwater BMPs and vegetation on slopes for stabilization are proposed in the full buildout condition to prevent sedimentation from discharging into the stream within the site boundary.

13. Contamination/Hazardous Materials/Wastes

- a. **Pre-project Site Conditions – Describe existing contamination or potential environmental hazards on or in close proximity to the project site, such as soil or groundwater contamination, abandoned dumps, closed landfills, existing or abandoned storage tanks, and hazardous liquid or gas pipelines. Discuss any potential**

environmental effects from pre-project site conditions that would be caused or exacerbated by project construction and operation. Identify measures to avoid, minimize, or mitigate adverse effects from existing contamination or potential environmental hazards. Include development of a Contingency Plan or Response Action Plan.

The MPCA's What's in My Neighborhood database was reviewed to determine if any known contaminated properties or potential environmental hazards are located within or adjacent to the site. No sites were identified within the site or within 250 feet of the site boundary; six listings were identified within 500 feet of the site boundary (see Table 7 and Figure 12). Of the six sites, all have activities that are listed as active.

Unknown materials may also be encountered during construction. A Response Action Plan and Construction Contingency Plan will be developed to outline the methods for identifying, segregating and handling contaminated soil and/or groundwater that may be encountered during construction.

Table 7: What's in My Neighborhood Sites

Site ID	Site Name	Active?	Activity	Program
83996	Paul Dietz Farm	Y	Feedlots	Feedlots
227654	Daikin Applied Americas Inc	Y	Construction Stormwater; Hazardous Waste, Very small quantity generator; Toxics Reduction	Hazardous Waste; Pollution Prevention; Stormwater
120505	Faribault Distribution Center	Y	Industrial Stormwater	Stormwater
151443	Daikin Applied - Faribault North	Y	Industrial Stormwater	Stormwater
85889	Ernest Koktavy Farm	Y	Feedlots	Feedlots
80973	Holden Koktavy Farm - Sec 36	Y	Feedlots	Feedlots

- b. Project Related Generation/Storage of Solid Wastes – Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from solid waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.**

The project will ensure compliance with applicable laws, rules, and ordinances related to the management of solid and hazardous waste as required by Minnesota Statutes, Section 473.811.

Waste Generated During Construction

Construction of the proposed development will generate construction-related waste materials such as wood, packaging, excess materials, and other wastes, which will either be recycled or disposed of in the proper facilities in accordance with state regulations and guidelines.

Redevelopment of portions of the site may generate earth materials and debris during demolition activities. Demolition debris is inert material such as concrete, brick, bituminous, and rock. The solid wastes generated during demolition will be recycled or disposed of at a state-permitted landfill.

Waste Generated During Operation

For solid waste generated during operations, a source recycling/separation plan will be implemented, and wastes that cannot be recycled will be managed in accordance with state regulations and guidelines.

The proposed development will generate new demands on solid waste management and sanitation services provided in the project area. Based on the proposed area of up to 500,000 square feet of industrial space, it is estimated that the non-residential (institutional) waste stream will be around 7,500 tons per year. Waste generated during operation will be sent to a state-permitted landfill.

- c. **Project Related Use/Storage of Hazardous Materials – Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location, and size of any new above or below ground tanks to store petroleum or other materials. Indicate the number, location, size, and age of existing tanks on the property that the project will use. Discuss potential environmental effects from accidental spills or releases of hazardous materials. Identify measures to avoid, minimize, or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.**

No above or below ground tanks currently exist within the site. Any hazardous materials used/stored during construction and/or operation of the project will be disposed of in the manner specified by local or state regulation or by the manufacturer. A spill prevention plan will be developed, and proper spill prevention controls will be in place for any vehicle refueling or maintenance that occurs on site during construction.

- d. **Project Related Generation/Storage of Hazardous Wastes – Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of hazardous wastes including source reduction and recycling.**

Removal of the existing residence is not anticipated to generate hazardous waste.

Toxic or hazardous waste to be stored within the site during construction will include fuel and oil necessary to operate heavy construction equipment and during operations may include commercial cleaning supplies. Regulated material and/or waste generated or stored during construction and operations will be managed in accordance with state and local requirements.

14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

a. Describe fish and wildlife resources as well as habitats and vegetation on or near the site.

The current site primarily consists of agricultural and wooded land. There is a stream bisecting the site, providing habitat for aquatic species and riparian vegetation. Wetlands within the study area provide potential habitat for wildlife, as well. The existing trees and landscaped areas on site provide potential habitat for wildlife. The project site consisted of wildlife habitats that support small mammals, songbirds, raptors, deer, coyotes, foxes or other small to medium sized wildlife species. This project area is highly disturbed with actively farmed areas, roadways, and residences.

Cannon River is located approximately 1.3 miles east of the site, and the Cannon River Trout Lily Scientific and Natural area is located more than 2 miles southeast of the site. Neither of these resources are anticipated to be impacted.

b. Describe rare features such as state-listed (endangered, threatened, or special concern) species, native plant communities, Minnesota Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-2024-006) and/or correspondence number (MCE 2024-00982) from which the data were obtained and attach the Natural Heritage Review letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe results.

No DNR wildlife management areas, wildlife refuges, or wild and scenic river districts were identified within one mile of the site.

One unlabeled, regionally significant ecological area (RSEA) is mapped approximately 0.55 miles northwest of the project site. One Minnesota County Biological Survey Site of Biodiversity Significance, labeled as Forest 35 Woods, is mapped approximately 0.55 miles northwest of the project site. One DNR native plant community, labeled as a southern mesic oak-basswood forest, is mapped approximately 0.6 miles northwest of the project site.

Consultation with the Minnesota DNR (MCE #2024-00982) identified one or more calcareous fens in the vicinity of the proposed project. Calcareous fens are rare, protected wetlands in Minnesota. Calcareous fens are fragile and rely on groundwater hydrology, so nearby disturbances can impact these fens.

The MnDNR also identified the study area as a high-potential zone for the rusty patched bumble bee (RPBB), a federally endangered species. The MnDNR recommends reseeding with native seed mixes, to encourage RPBB populations.

A review of the DNR's Natural Heritage Inventory System (NHIS) database was conducted per

license agreement LA2024-006 for the area within one mile of the site. The database includes the known occurrences of any state endangered, threatened, or special concern species. The review identified no species within or near the site.

- c. **Discuss how the identified fish, wildlife, plant communities, rare features, and ecosystems may be affected by the project, including how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.**

The project is not likely to affect species and resources on site. The project proposes to clear ~~up to 8.3 approximately two~~ acres of trees during the winter ~~to avoid roosting bats or nest birds, and~~ ~~The project site which was previously sused~~ ~~for agricultural purposes will be developed~~ ~~develop land that was previously used for agricultural purposes.~~ ~~The project will~~ ~~The site plan~~ avoids impacts to unfarmed wetlands and the streams on site. Additionally, the project proposes to implement erosion control measures and will reseed with native seed mixes, which will provide habitat for small mammals, insects, and bird species.

Invasive species are plants and animals that are not native to an area and are capable of causing harm. Certain measures can be taken to limit the likelihood of introducing invasive species, such as securing local materials to avoid the long-range movement of goods or washing vehicles prior to accessing the project site. Additionally, landscape design will include native, non-invasive plants.

Temporary groundwater dewatering activities associated with the project will have no adverse impact on nearby calcareous fens because all water extracted during the dewatering process will be retained within the same watershed. Discharged water will be directed to a temporary erosion control Best Management Practice (BMP) setup specifically for sediment removal prior to release. This method ensures that no detrimental changes occur to the hydrology or water quality of the nearby sensitive ecosystems, maintaining the ecological balance and integrity of the calcareous fens.

- d. **Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to fish, wildlife, plant communities, and sensitive ecological resources.**

The proposed project will make best effort in conducting tree removal outside of the recommended tree clearing windows as outlined by the US Fish and Wildlife Services (USFWS) and Minnesota DNR to avoid direct effects to overwintering Rusty-patched Bumble Bees, and to limit impacts during bat pup season. No impacts to the stream are anticipated, however, erosion control BMPs will be incorporated into site planning. Native seed mixes will be added to the proposed development to provide suitable habitat for small mammals, insects, and bird species within the project vicinity.

State requirements necessitate the control and spread of state listed noxious weeds and/or invasive weeds if encountered prior to construction. Methods to avoid spreading noxious weeds and/or invasive species will be incorporated into project specifications and/or the SWPPP when developed. Disturbed areas will be reestablished using appropriate native and

stabilization seed mixes.

15. Historic Properties

Describe any historic structures, archeological sites, and/or traditional cultural properties on or in close proximity to the site. Include 1) historic designations; 2) known artifact areas; and 3) architectural features. Attach letter received from the State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to historic properties.

The Minnesota Statewide Historic Inventory Portal (MnSHIP) was reviewed to identify historic resources. According to MnSHIP, there are no historic resources within the study area. According to the Minnesota Office of the State Archeologist (OSA) Public Viewer map, there are no known archeological records in the vicinity of the site.

16. Visual

Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

The AUAR study area includes existing agricultural land that is not near any unique designated scenic views or vistas. Any development of agricultural land will have an impact on the visual look of a property. Future development would conform with the city ordinances for building height, building form, landscape screening, and lighting to avoid impacts to neighboring properties and species. No significant visual impacts are anticipated.

As building and site designs advance, lighting practices will be selected to address known ecological concerns and prevent avoidable impacts to insects, wildlife, rare plants, and adjacent natural areas. Guidance from the USFWS to minimize blue light, uplight, and backlight will be adhered to the extent practicable.

17. Air

- a. **Stationary Source Emissions – Describe the type, sources, quantities, and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants and criteria pollutants. Discuss effects to air quality including any sensitive receptors, human health, or applicable regulatory criteria. Include a discussion of any methods used to assess the project’s effect on air quality and the results of that assessment. Identify pollution control equipment and other measures that will be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions.**

Stationary source air emissions for the proposed buildings are anticipated to be minimal based on the anticipated mechanical equipment that will be installed. The proposed project may consist of some type of back up emergency generator to provide power to the critical infrastructure of the facility during power outages. It is not known at this time what size, type, and quantity of back up emergency generators will be utilized by the project. Once more

information is known for the site, a full air quality analysis will be completed, coordination with the Minnesota Pollution Control Agency (MPCA) will occur, and any anticipated permits will be obtained from the MPCA. If the emissions exceed a mandatory EAW threshold, an additional environmental review will be completed. This item is not applicable because any stationary air emissions source large enough to merit environmental review requires individual review.

- b. Vehicle Emissions – Describe the effect of the project’s traffic generation on air emissions. Discuss the project’s vehicle-related emissions effect on air quality. Identify measures (e.g., traffic operational improvements, diesel idling minimization plan) that will be taken to minimize or mitigate vehicle-related emissions.**

The Minnesota Department of Transportation (MnDOT) has developed a screening method designed to identify intersections that will not cause a carbon monoxide (CO) impact above state standards. MnDOT has demonstrated that even the 10 highest traffic volume intersections in the Twin Cities do not experience CO impacts. Therefore, intersections with traffic volumes lower than these 10 highest intersections will not cause a CO impact above state standards. MnDOT’s screening method demonstrates that intersections with total daily approaching traffic volumes below 82,300 vehicles per day will not have the potential for causing CO air pollution problems. None of the intersections in the study area exceed the criteria that would lead to a violation of the air quality standards.

- c. Dust and Odors – Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under Item 17a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.**

The proposed project scenario may generate temporary fugitive dust emissions during construction. The City of Faribault regulates dust in accordance with the standards set by the MPCA.⁷ Dust emissions can be controlled by sweeping, watering, sprinkling, as appropriate or as prevailing weather and soil conditions dictate. Dust emissions are not anticipated during operations as all ground surfaces will either be impervious or vegetated.

18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

- a. GHG Quantification – For all proposed projects, provide quantification and discussion of project GHG emissions. Include additional rows in the tables as necessary to provide project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.**

About Greenhouse Gases (GHGs)

Certain gases in the earth’s atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth’s surface temperature. Solar radiation enters the earth’s

⁷ <https://www.pca.state.mn.us/air-water-land-climate/air-pollutants>

atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming.

Project-related GHG Emissions

This section describes the GHG emissions from the existing buildings within the study area and includes an estimated quantification of the following GHG emissions associated with the proposed [scenario project](#).

- Carbon dioxide (CO₂)
- Nitrous oxide (N₂O)
- Methane (CH₄)

The projected GHG emissions are provided on an average annual basis using the CO₂ equivalent (CO₂e) and include the proposer's best estimate of average annual emissions over the proposed life/design service life of future development. The estimates also include emissions from the construction and operating phases of the [scenario project](#). Emissions were estimated using the US Environmental Protection Agency's Simplified GHG Emissions Calculator (SGEC) (Version June 2021)⁸ and are summarized in **Table 8** and **Table 9a & 9b** by project phase (i.e., construction and operations) and source type (e.g., combustion from mobile equipment, off-site electricity), see Appendix C. Construction emissions for the proposed [scenario project](#) is based on length of construction and are from mobile equipment including passenger cars, light-duty trucks, and medium and heavy-duty trucks, and construction equipment (both gasoline and diesel). Operational emissions provided in Table 9a and 9b for this project represent two independent [scenarios project scenarios](#), ~~based on the customer specifications for testing of emergency generators.~~ ~~Generator testing will be supported by either natural gas (Table 9b) or onsite diesel (Table 9a).~~ [Any](#)

⁸ <https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator>

~~necessary~~required air permits and/or agency review will be provided as required for onsite operational emissions.

DRAFT

Table 8. Construction Emissions

Scope	Emission Type	Emission Sub-Type	Emission	Existing CO _{2e} Emissions (total)	Proposed Project-Related CO _{2e} Emissions (tons, total)
Scope 1	Combustion	Mobile equipment	CO ₂ , N ₂ O, CH ₄	n/a	4,251
Total				n/a	4,251

Table 9a. Operational Emissions (Diesel Generators)

Scope ⁹	Emission Type	Emission Sub-Type	Emission	Existing CO _{2e} Emissions (tons/year)	Proposed CO _{2e} Emissions (tons/year)
Scope 1	Combustion (Diesel Generators)	Stationary equipment	CO, NO, HC, PM	50	702
Scope 2	Off-site electricity	Grid-based	CO ₂ , N ₂ O, CH ₄	150	528,975 7,097
Scope 3	Off-site waste management	Area	CO ₂ , CH ₄	20	2,125
Total				220	9,924 529,805

⁹ The diesel and natural gas usage values presented in this report pertain specifically to generator testing and were calculated using the EPA's Greenhouse Gas Emissions Calculator: <https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator>. The figures are based on data provided by the applicant and have been categorized under Scope 1 emissions.

Table 9b. Operation Emissions (Natural Gas)

Scope ¹⁰	Emission Type	Emission Sub-Type	Emission	Existing CO _{2e} Emissions (tons/year)	Proposed CO _{2e} Emissions (tons/year)
Scope 1	Combustion (Natural Gas)	Stationary equipment	CO, NO, HC, PM	50	531
Scope 2	Off-site electricity	Grid-based	CO ₂ , N ₂ O, CH ₄	150	7097526.976
Scope 3	Off-site waste management	Area	CO ₂ , CH ₄	20	2,125
Total				220	9,753,632

b. GHG Assessment

i. Describe any mitigation considered to reduce the project's GHG emissions.

Unless otherwise noted differently, the following are potential design strategies and sustainability measures that are under consideration for this project to reduce emissions for this project:

- Energy efficient data center cooling technology, namely non-evaporative air-cooled primary-loop heat-rejection and secondary closed-loop liquid cooling.
- Energy efficient building shells.
- Waste management best practices to recycle and compost appropriate materials when applicable.
- Trees and additional landscaping.
- Elective vehicle charging infrastructure.
- Grid-based wind and solar power and/or the purchase of RECs dependent upon customer specifications.
- Onsite wind power

Implementation of the above strategies will be evaluated on a case-by-case basis based on code requirements, feasibility, availability of materials, schedule, and customer specifications. The project proposer will work with the City to identify additional mitigation strategies that could be implemented to reduce greenhouse gas emissions or offset the carbon footprint of the proposed project.

¹⁰ The diesel and natural gas usage values presented in this report pertain specifically to generator testing and were calculated using the EPA's Greenhouse Gas Emissions Calculator: <https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator>. The figures are based on data provided by the applicant and have been categorized under Scope 1 emissions.

ii. **Describe and quantify reductions from selected mitigation, if proposed to reduce the project's GHG emissions. Explain why the selected mitigation was preferred.**

- The proposed project would require new appliances, equipment, and lighting during operation. The use of energy efficient technologies would reduce the amount of electricity used per product. Collectively, the implementation of these technologies would reduce overall energy use and in-turn, GHG emissions.
- The proposed project would require heating and cooling during operation. One of the highest sources of energy use is energy spent heating and cooling buildings. The use of energy efficient building shells reduces the amount of energy needed for heating and cooling, therefore reducing energy use and GHG emissions. Energy efficient data center cooling technology, namely non-evaporative air-cooled primary-loop heat-rejection and secondary closed-loop liquid cooling, will also be considered and implemented based on tenant considerations.
- Waste would be generated during operation of the proposed project. By implementing waste best management practices and recycle and compost appropriate material when applicable, GHG emitted from wastes during operations can be reduced.
- Trees and additional landscaping can reduce the GHG footprint of the project by absorbing greenhouse gas emissions. Tree replacement will occur per City requirements.

The potential mitigation listed in Item 18.b.i. was selected to comply with best management practices for new construction and reduce GHG emissions where practicable during operations.

iii. **Quantify the proposed project's predicted net lifetime GHG emissions (total tons per number of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.**

The Next Generation Energy Act requires the state to reduce greenhouse gas emissions in the state by 80 percent between 2005 and 2050, while supporting clean energy, energy efficiency and supplementing other renewable energy standards in Minnesota. The MPCA's biennial GHG emissions reduction report from 2021 identifies strategies for reducing emissions in the three economic sectors with the highest emissions – transportation, electricity generation, and agriculture, forestry, and land use.

The current EAW study area currently generates approximately 270 CO₂e metric tons per year. Under the proposed project, this amount will increase to 9,924,529,803

CO2e metric tons per year if diesel generators are used, or 9,753,529,632 CO2e metric tons per year if natural gas generators are used.

The expected lifespan of the project (assuming periodic upgrades to IT equipment), is approximately 25-30 years. This equates to a total estimated 297,720,132,45,075 CO2e metric tons over the lifetime of the development if diesel generators are used and 292,590,132,40,800 CO2e metric tons if natural gas generators are used. The proposer will evaluate implementing the sustainability measures listed in Item 18.b.i to reduce operational emissions to the extent practicable. The proposed project will be built in compliance with state regulations and City building codes.

19. Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area; 2) nearby sensitive receptors; 3) conformance to state noise standards; and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

Existing Noise

The EAW study area is currently agricultural land surrounded by agricultural land, county roads ~~and~~ state highways and an existing industrial area of the city. The existing noise sources at the site consist mainly of the surrounding roadways.

Construction Noise

Construction of the proposed project would comply with MPCA state and local noise standards. A noise study has not yet been conducted but will be completed if required.

Traffic Generated Noise

A sound increase of 3 dBA is barely noticeable by the human ear, a 5 dBA increase is clearly noticeable, and a 10 dBA increase is heard as twice as loud. For example, if the sound energy is doubled (i.e., the amount of traffic doubles), there is a 3 dBA increase in noise, which is just barely noticeable to most people. On the other hand, if traffic increases by a factor of 10, the resulting sound level will increase by about 10 dBA and be heard as twice as loud. Traffic volumes in the project area are either on roadways that do not have receivers that are sensitive to noise, or the traffic levels attributable to the project are well below the amount that would generate a sound increase that could be noticeable. The change in traffic noise levels is not anticipated to be readily perceptible.

Operational Noise

~~For the proposed Scenario, the main sources of noise include ventilation systems, industrial traffic and the use of generators tested once a month and in the case of emergency.~~ Sensitive receptors within the project site vicinity include adjacent residential houses, and businesses. For the proposed project, the main sources of noise include ventilation systems, and traffic generated noise. The proposed facility may also include back-up emergency generators that would be tested once a month and would be used in the event of a critical loss of power. Further

~~noise evaluation will be completed as design progresses and best practices to reduce noise will be implemented for the technology park uses to ensure compliance with local and state noise regulations.~~ Noise attenuation measures such as sound walls or increased buffering from the property line (i.e. physical distance, berms, or dense landscaping) may be incorporated into project design to ensure that MPCA noise rules and City noise ordinances are followed. Further noise evaluation will be completed as design progresses and best practices to reduce noise will be implemented for the project to ensure compliance with local and state noise regulations.

20. Transportation

- a. **Describe traffic-related aspects of project construction and operation. Include 1) existing and proposed additional parking spaces; 2) estimated total average daily traffic generated; 3) estimated maximum peak hour traffic generated and time of occurrence; 4) source of trip generation rates used in the estimates; and 5) availability of transit and/or other alternative transportation modes.**

Parking

The site is expected to provide approximately 90 parking spaces. This complies with the standards listed in Appendix B, Sec. 8-200 of the City of Faribault's Code of Ordinances.

Existing Conditions

The existing roadway network in the area includes I-35, 150th Street W, Bagley Avenue, and Acorn Trail. The following provides a brief description of the roadways within the study area:

Interstate 35 (I-35) is an interstate highway which serves as a major regional north-south connector. It is a four-lane divided freeway with two general travel lanes in each direction. I-35 is classified as an interstate with an existing Annual Average Daily Traffic (AADT) of 33,511 vehicles per near the study area, based on MnDOT data from 2023. The posted speed limit is 70 mph.

150th Street W (CSAH 9) is an east-west county road. It is a two-lane undivided road. 150th Street W is classified as a minor collector with an existing AADT of 322 vehicles per day near the study area, based on MnDOT data from 2023. There is no posted speed limit, therefore it is assumed to be the default Minnesota Statute speed limit of 55 mph.

Bagley Avenue (CSAH 46) is a north-south, two-lane undivided roadway. Bagley Avenue is classified as a major collector with an AADT of 1,700 vehicles per day, according to MnDOT data from 2008. The posted speed limit is 55 mph.

Acorn Trail (CSAH 76) is a north-south, two-lane undivided roadway. Acorn Trail is classified as a major collector with an AADT of 920 vehicles per day, according to MnDOT data from 2021. The posted speed limit is 50 mph.

Proposed Conditions – Site Access

The site is proposed to be accessed in two locations along Acorn Trail: one in the southern portion of the site and one in the northern portion of the site. An additional separate

access to the substation maybe be provided along Acorn Trail; Access spacing will maintain minimum driveway spacing requirements as set forth by Rice County.

Traffic Generation

Trip generation for the proposed development was estimated using average trip generation rates given in the Institute of Transportation Engineers' *Trip Generation Manual, 11th Edition*. Trip generation numbers are rounded up to the nearest multiple of 5. Trip generation was estimated using the Land Use Code (LUC) 160 – Data Center. The estimated trip generation of the development is given below in *Table* .

Table 10. Project Trip Generation

Land Use	Intensity	AM Peak Hour			PM Peak Hour			Daily
		Total	In	Out	Total	In	Out	
LUC 160 – Data Center	500 kSF	55	30	25	50	15	35	500

Transit

There are no public transit services available near the site.

- b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at: <http://www.dot.state.mn.us/accessmanagement/resources.html>) or a similar local guidance.**

A Traffic Impact Analysis was completed in February 2025 for the Archer Datacenter site. Based on the findings of the Archer Datacenter TIA, the area's transportation network is expected to support the development with mitigation.

Under all Existing (2025), Opening Year (2030) and Design Year (2045) conditions without the completion of the interchange at 150th Street, all study intersections are anticipated to operate acceptably, and no capacity improvements are expected to be necessary (see Table 11).

Under Design Year (2045) conditions with the addition of the interchange, both study intersections of 150th Street & Bagley Avenue and 150th Street & Acorn Trail are anticipated to operate at LOS F during the PM peak hour and will require improvements.

Table 11: Existing and Projected Intersection LOS

Intersection	Existing LOS	No-Build LOS			Build-Scenario LOS		
	2025	2030	2045	2045 Int ¹¹	2030	2045	2045 Int ¹¹
AM Peak Hour							
150th Street & Bagley Avenue	A	A	A	E (C)	A	A	E (C)
150th Street & Acorn Trail	A	A	A	A (B)	A	A	A (B)
Acorn Trail & North Access	-	-	-	-	A	A	A
Acorn Trail & South Access	-	-	-	-	A	A	A
PM Peak Hour							
150th Street & Bagley Avenue	A	A	A	F (C)	A	A	F (C)
150th Street & Acorn Trail	A	A	A	F (D)	A	A	F (D)
Acorn Trail & North Access	-	-	-	-	A	A	A
Acorn Trail & South Access	-	-	-	-	A	A	A

- c. Identify measures that will be taken to minimize or mitigate project related transportation effects.

Existing (2025) Conditions

- No recommended mitigation

Opening Year (2030) No-Build Conditions

- No recommended mitigations

¹¹ 2045 with construction of the interchange at 150th Street. Mitigated conditions results indicated in parentheses (). No-Build mitigated conditions were not conducted but are not expected to differ from Build mitigated conditions significantly.

Opening Year (2030) Build Conditions

- Install side street stop control at the site access points.

Design Year (2045) No-Build Conditions

- No recommended mitigation

Design Year (2045) Build Conditions

- Install side street stop control at the site access points.

Design Year (2045) No-Build with Interchange Conditions

- Install all-way stop at 150th Street W & Bagley Avenue
- Install eastbound and westbound left turn lanes at 150th Street W & Bagley Avenue
- Install traffic signal at 150th Street W & Acorn Avenue

Design Year (2045) Build with Interchange Conditions

- Install all-way stop at 150th Street W & Bagley Avenue
- Install eastbound and westbound left turn lanes at 150th Street W & Bagley Avenue
- Install traffic signal at 150th Street W & Acorn Avenue

21. Cumulative Potential Effects

- a. Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.**

Cumulative effects are defined as 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, regardless of what person undertakes the other projects or what jurisdictions have authority over the projects." The geographic areas considered for cumulative effects are those areas adjacent to the EAW study area, and the timeframe considered includes projects that would be constructed in the reasonably foreseeable future.

- b. Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes identified above.**

Future private development projects may result in impacts to transportation, water resources, and utilities. These impacts will be addressed via the regulatory permitting and approval processes and will be individually mitigated to ensure minimal cumulative impacts occur.

- c. Discuss the nature of the cumulative potential effects and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.**

Not Applicable.

22. Other Potential Environmental Effects

If the project may cause any additional environmental effects not addressed by Items 1 to 21, describe the effects here, discuss the how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

All known environmental effects are addressed in the preceding sections.

DRAFT

RGU Certification

*The Environmental Quality Board will only accept **SIGNED** Environmental Assessment Worksheets for public notice in the EQB Monitor.*

I hereby certify that:

- The information contained in this document is accurate and complete to the best of my knowledge.
- The EAW describes the complete project; there are no other projects, stages, or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively,
- Copies of this EAW are being sent to the entire EQB distribution list.

Signature _____

Date _____

Title _____

Figures

DRAFT

Figure 1: County Map

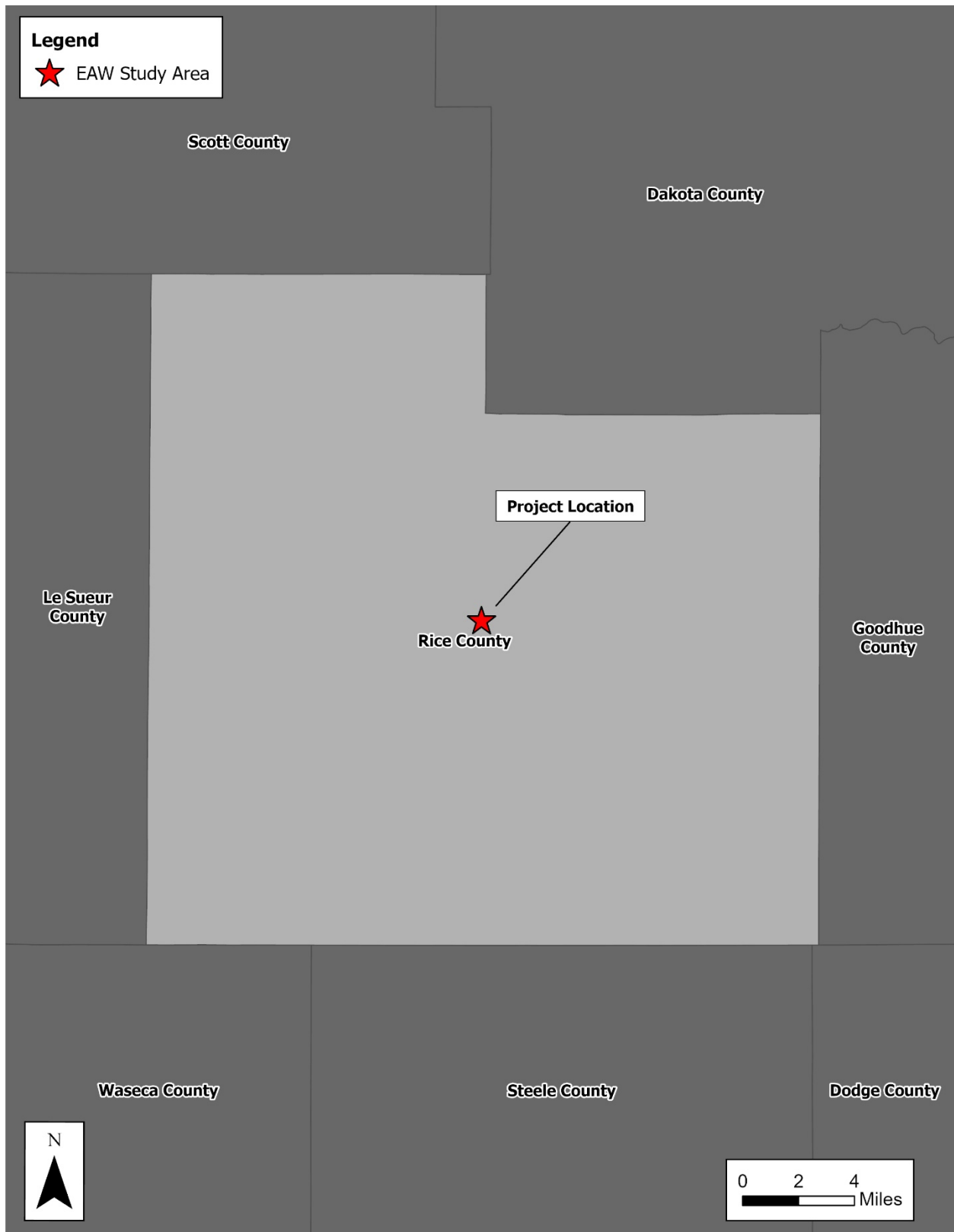


Figure 2: USGS Map

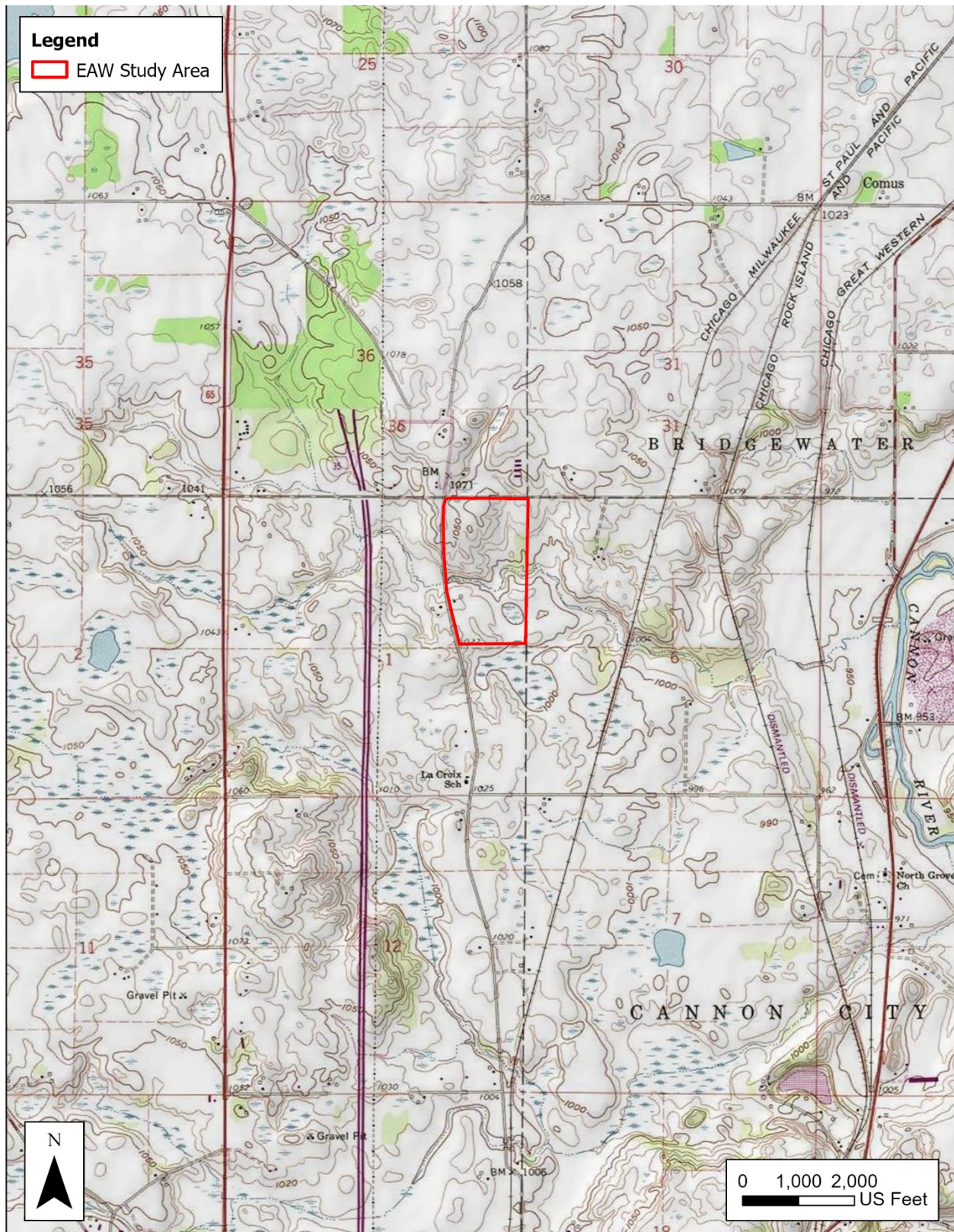


Figure 2: Existing Conditions



Figure 4: Cover Types

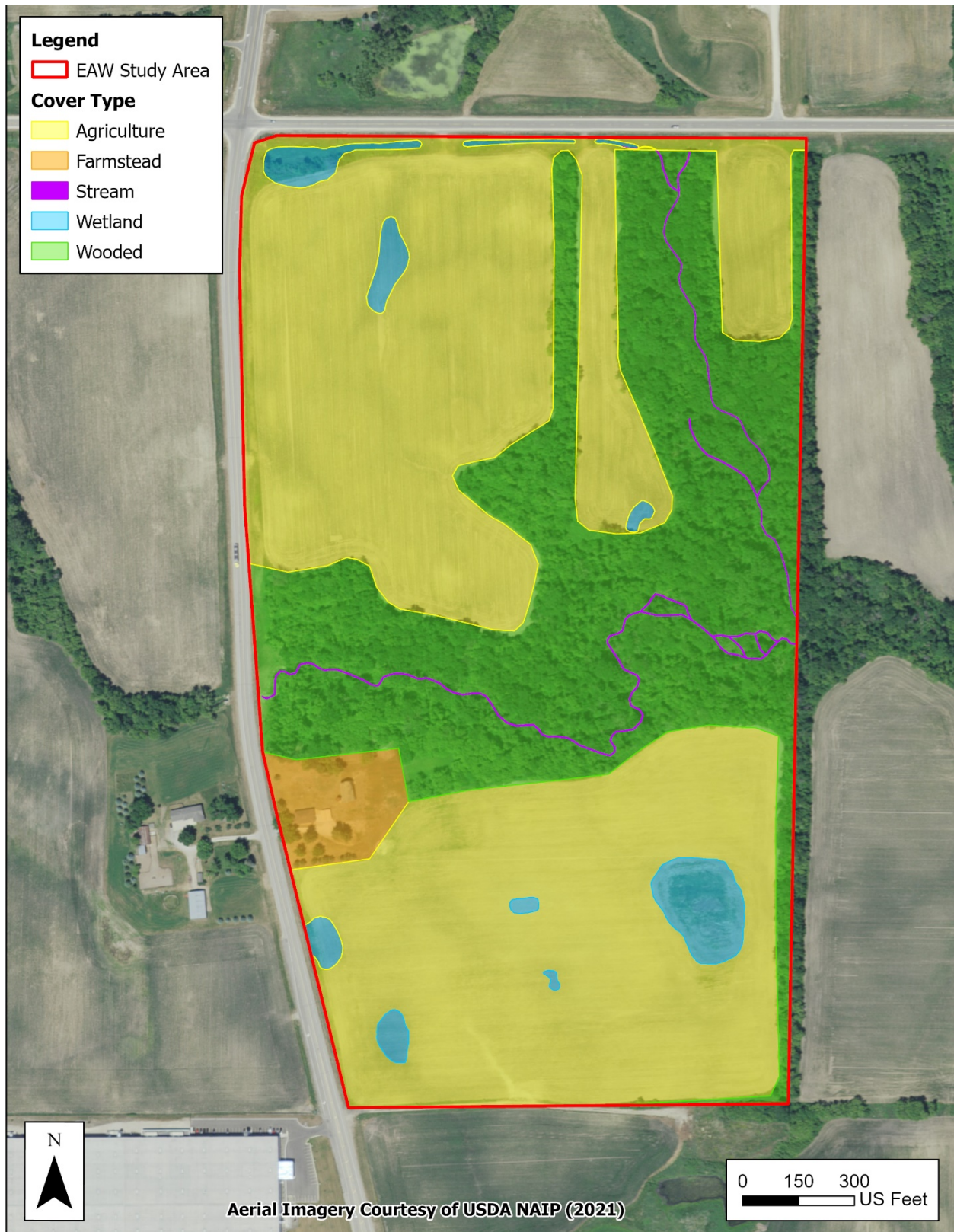


Figure 5: Existing Land Use



Figure 6: Future Land Use

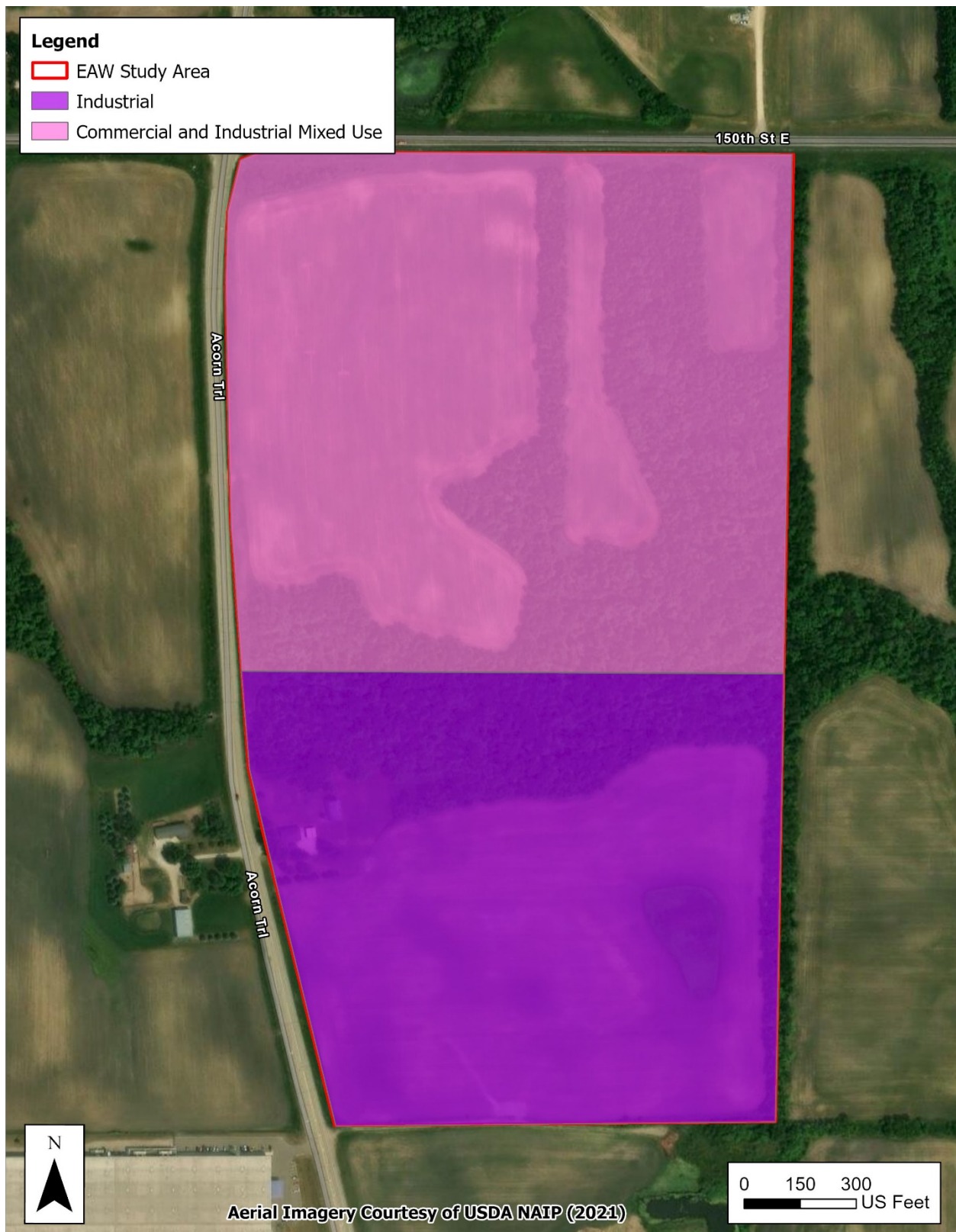


Figure 7: Existing Zoning

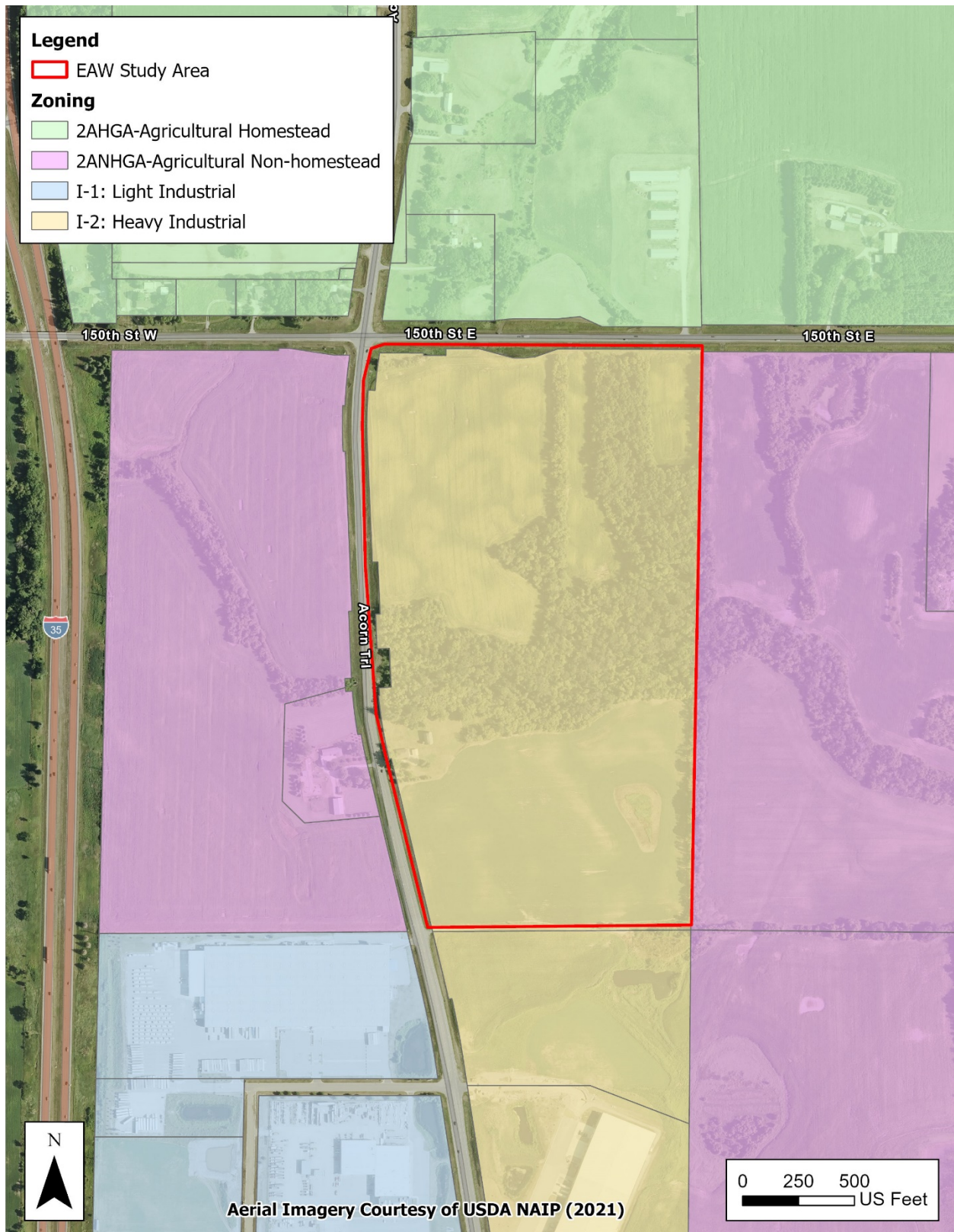


Figure 8: Soil Types

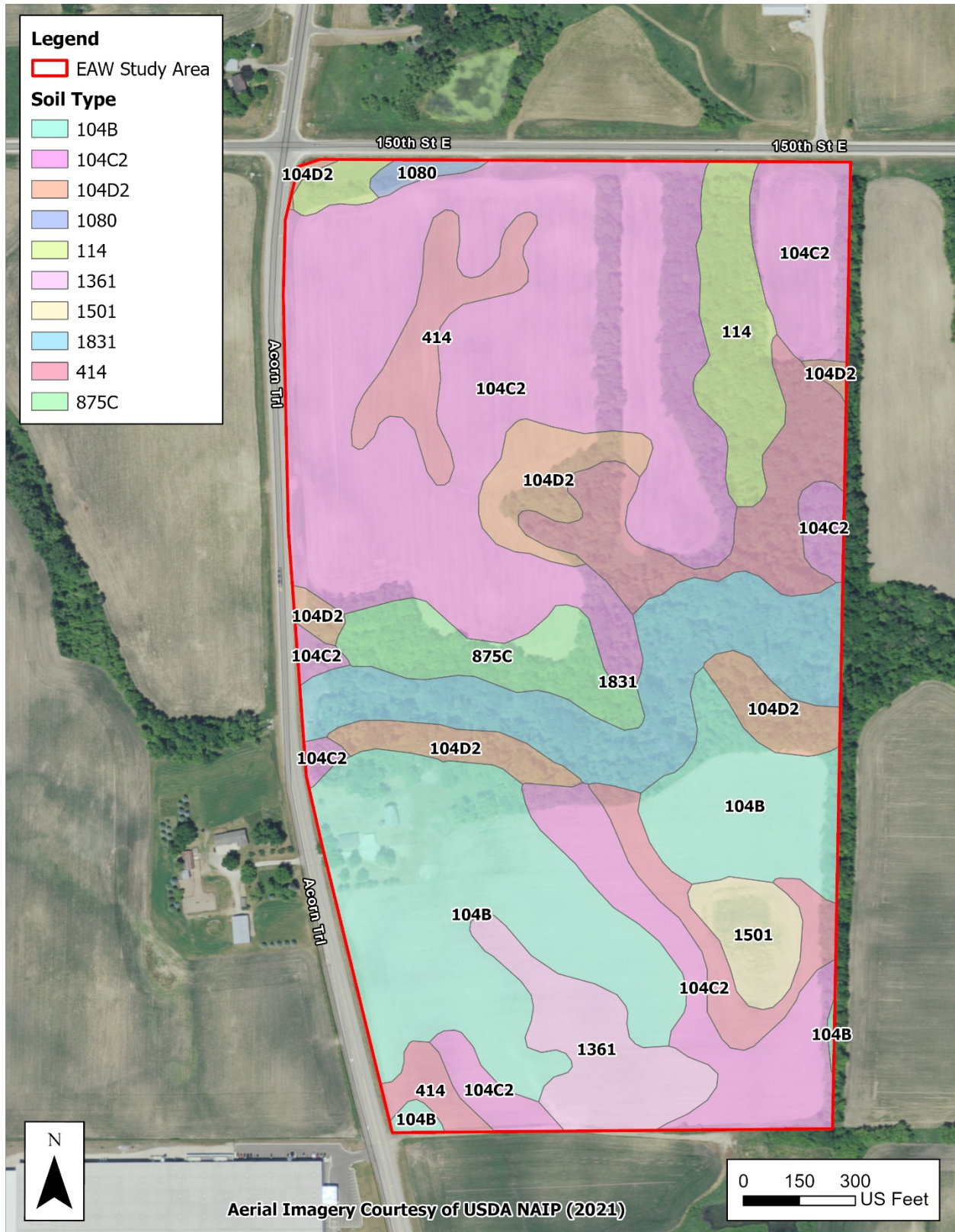


Figure 9: Surface Water Resources

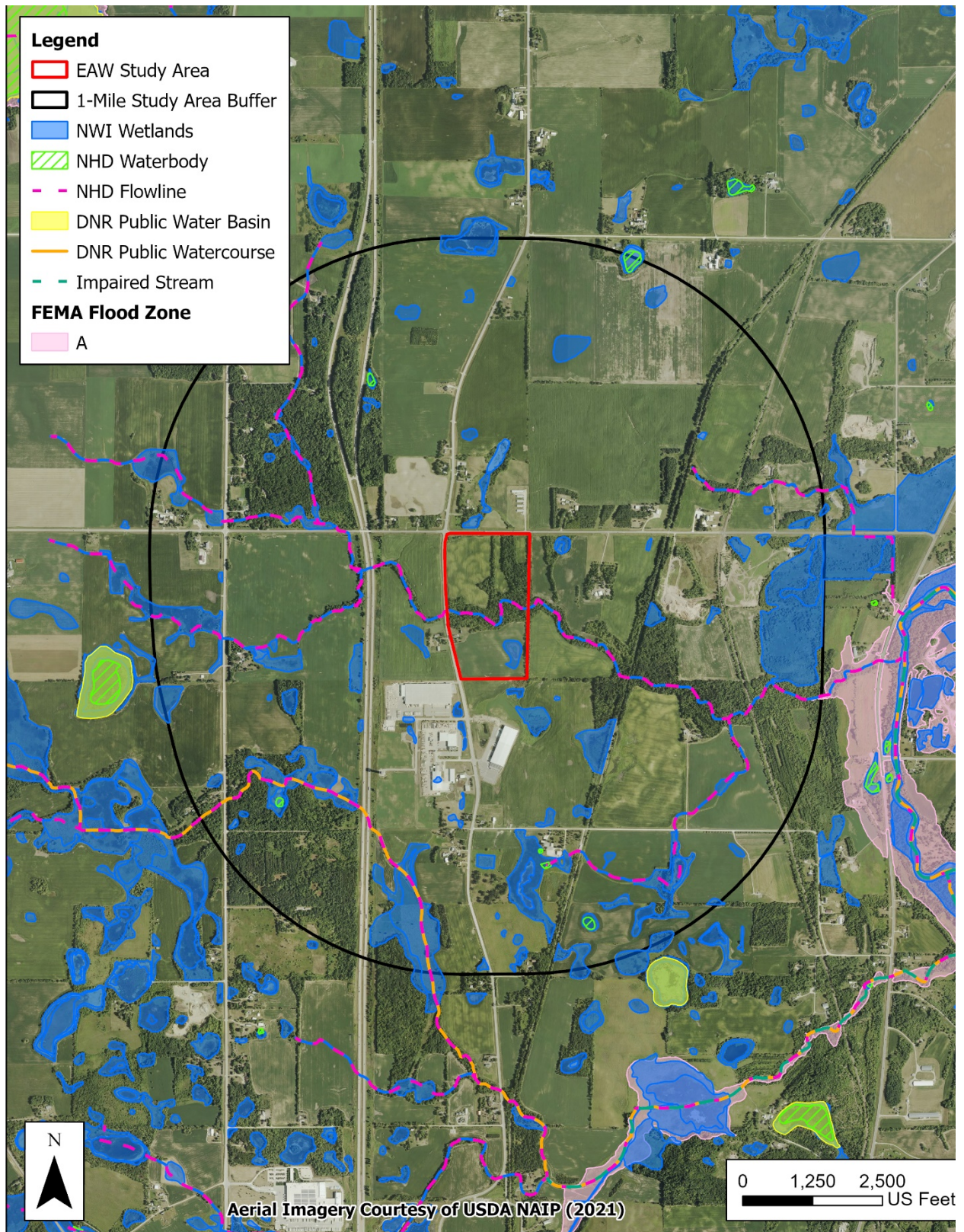


Figure 10: Groundwater Resources

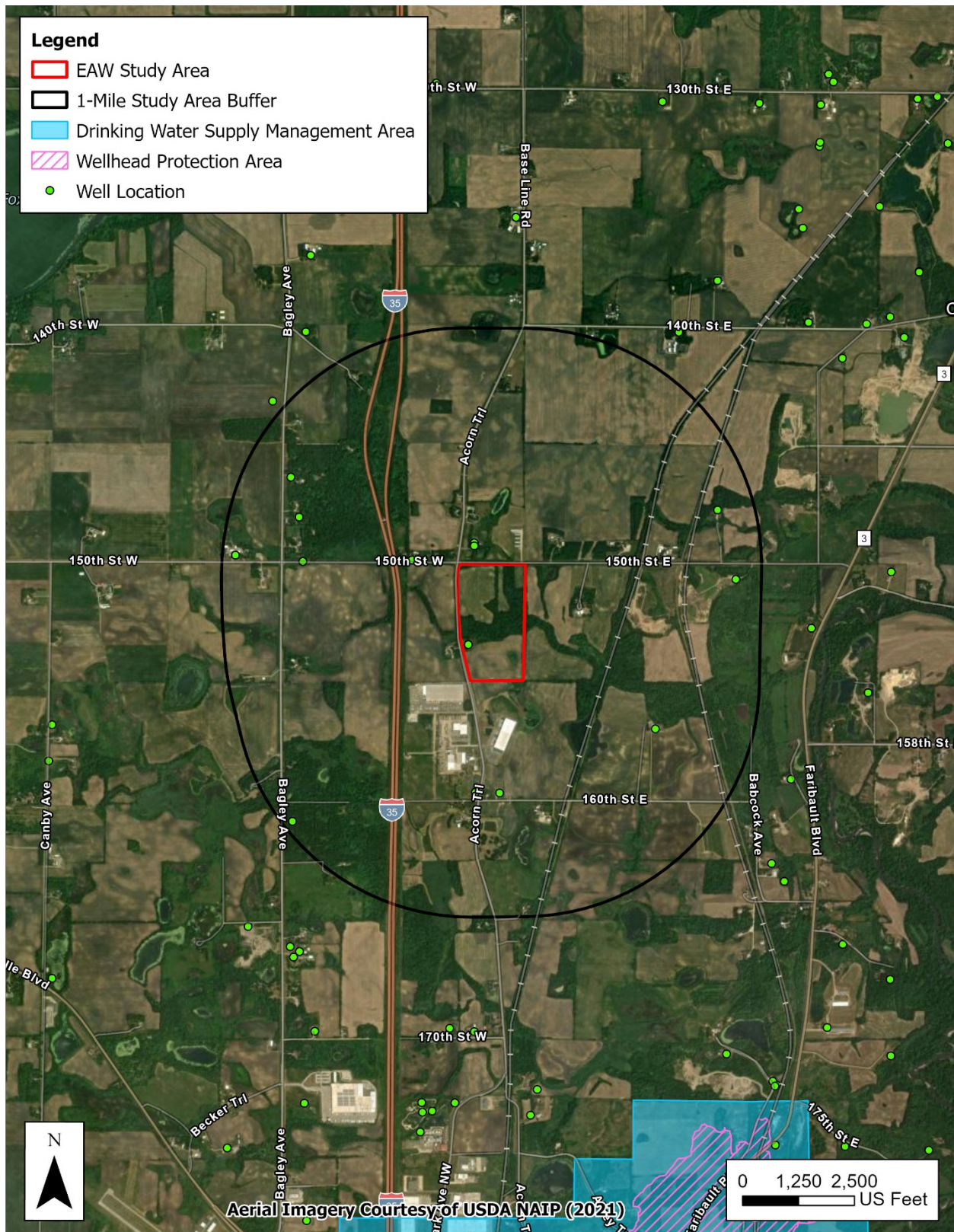


Figure 11: Delineation Summary

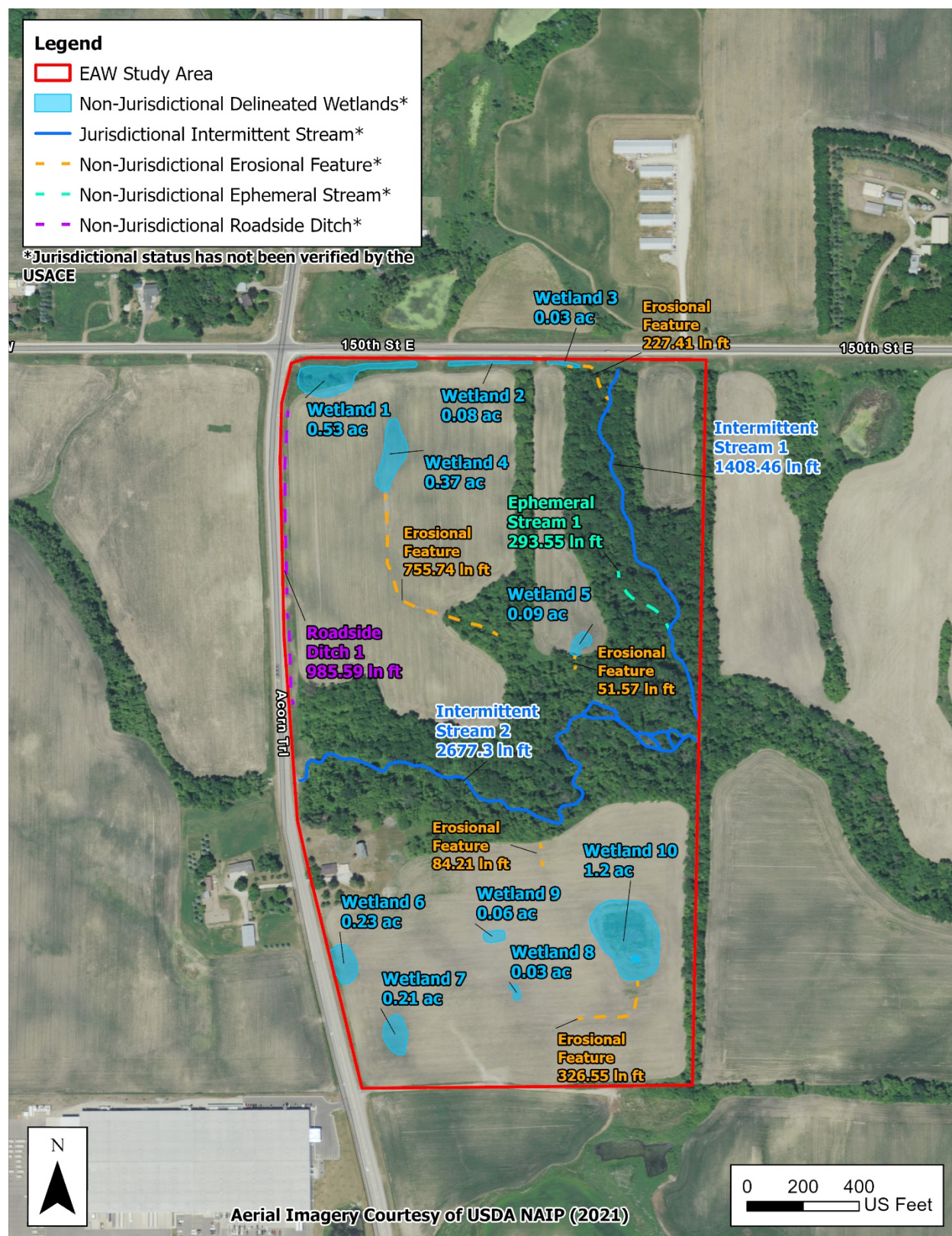
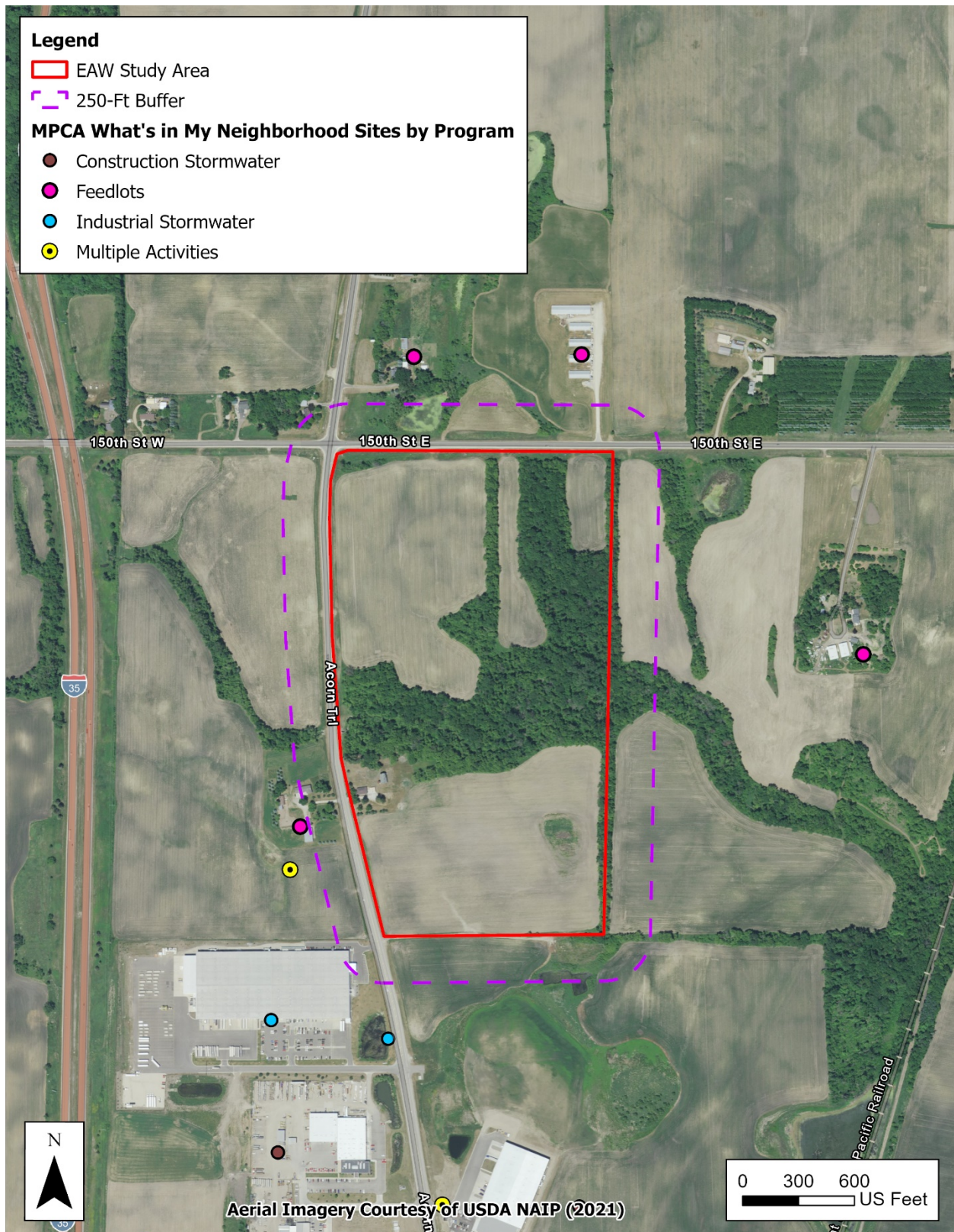


Figure 12: MPCA What's in My Neighborhood



Appendix A

Concept Site Plan

Appendix B

Wetland Delineation Report

DRAFT

Appendix C

Greenhouse Gas Analysis

DRAFT

Appendix D

Traffic Study

DRAFT

Appendix E

Sanitary Sewer Extension Exhibit

DRAFT

Introduction

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

The 30-day EAW comment period began May 21, 2025, and comments were accepted through June 20, 2025. Two (2) comment letters were received from government agencies. Responses to those comments are included in the following sections.

1. Minnesota Department of Natural Resources (MNDNR)

Comment	Response
<i>EAW Section 14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</i>	
Calcareous Fens The assumptions used to evaluate potential impacts on nearby calcareous fens provided on page 23 are not accurate. Extracting groundwater and exposing it to the atmosphere alters the chemistry of water, which can negatively impact calcareous fens if they are along the flow path. Retaining water in the same watershed also does not ensure “no adverse impact” on calcareous fens. To ensure compliance with Minnesota Statutes 103G.223 , coordination with the Minnesota Department of Natural Resources (DNR) is necessary to certify no impact. For this project, a no-effect concurrence determination from the DNR may be required and should be added to Table 6: Permits and Approvals Required. Please contact the DNR staff below to begin the no-effect concurrence process.	Noted. A “no-effect concurrence determination” has been added as a required permit/approval to Table 6. The DNR will be consulted as it relates to Calcareous Fens.

Comment	Response
Wildlife Life Section 14.a. should include a more robust description of wildlife resources, habitats, and vegetation on or near the site to provide a greater understanding of potential impacts. The specific type of woodland, wetlands, and animal species found in this area need to be discussed. This additional context increases project transparency and allows for the effective implementation of impact minimization, avoidance, and mitigation measures.	Comment noted. As previously noted in the EAW, the project site consisted of wildlife habitats that support small mammals, songbirds, raptors, deer, coyotes, foxes or other small to medium sized wildlife species. This project area is highly disturbed with actively farmed areas, roadways, and residences. Wildlife in the area may utilize the forested areas, farm fields and other areas within the project vicinity. The wildlife currently utilizing the project site will likely relocate to adjacent parcels and habitats during post construction.
Tree Clearing Two different estimates of tree clearing are provided in the EAW: 8.3 acres (pg. 10) and 2 acres (pg. 23). How many acres of tree clearing will occur needs to be clarified. Swamp white oak (<i>Quercus bicolor</i>), a state Species of Special Concern, was identified in the wetland delineation for the proposed project. Before tree clearing occurs, it is strongly recommended that a survey be done to verify the species and map the population. Upon species verification, steps should be taken to preserve Swamp white oaks on site, given the very small number and size of remaining populations in Minnesota, the limited amount of potential habitat, and concerns over regeneration.	Comment noted. The total acres of trees to be removed is approximately 10 acres. The project proposer will work to reduce the amount of tree removal to the extent practicable.

Comment	Response
Lawn/Landscaping The 7-acre increase in lawn/landscaping on site presents an opportunity to incorporate native plantings into the project design and help mitigate impacts on wildlife. Once established, native plants are lower maintenance compared to non-native species and provide an array of benefits. Native plants are adapted to the local environment and need less water, fertilizer, and pesticides, and don't require mulching, protection from frost, or continuous mowing. They produce nectar, pollen, and seeds that serve as food for native birds, butterflies, bees, and other wildlife. The deep roots of many native plants help stabilize soil, prevent erosion, and improve soil structure. They also improve the soil's ability to absorb water, reducing runoff and promoting groundwater recharge. For more information regarding incorporating native plants into the site design, please review the links below. • BWSR Native Vegetation Establishment and Enhancement Guidelines • BWSR Pollinator and Biodiversity Toolbox	Comment noted. The project proposer will continue to evaluate the potential to incorporate native plantings into the landscaping for the proposed project.

2. Minnesota Pollution Control Agency (MPCA)

Comment	Response
General	
The EAW does not have a State Historic Preservation Office (SHPO) letter attached as required in Item 15.	As previously discussed with SHPO, and the requested protocol for reviewing a project was followed. The MnSHIP portal was reviewed to identify any previously identified resources within the project vicinity. SHPO has not provided a comment response letter for the EAW.

Comment	Response
Under Item 17a., the response is inadequate. This section is still required to be answered for projects that do not trigger the mandatory air pollution EAW category.	Comment Noted. The EAW has been updated. Stationary source air emissions for the proposed buildings are anticipated to be minimal based on the anticipated mechanical equipment that will be installed. The proposed project will employ back-up emergency generation to provide power to the critical infrastructure of the facility during power outages. It is not known at this time what size, type, and quantity of back up emergency generators will be utilized by the project. Once more information is known for the site, a full air quality analysis will be completed, coordination with the Minnesota Pollution Control Agency (MPCA) will occur, and any anticipated permits will be obtained from the MPCA. If the emissions exceed a mandatory EAW threshold, an additional environmental review will be completed.
Wastewater	
12.b.i.1 Wastewater indicates that an approximately 0.6 mile sanitary sewer extension will be required for the project. A map showing the route to the existing sewer system connection shoeing the impacted area of construction should be included.	Comment noted. An exhibit showing the sanitary sewer extension is attached to the EAW.

Comment	Response
Noise	
The Responsible Governmental Unit (RGU) and any other land-use decisions makers, should consider language in Minn. R. 7030.0030 that reads “[...] Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use.” The Noise section of the EAW does not provide enough detail regarding current and anticipated sounds levels in the project area to determine whether an immediate violation of the state noise standards would occur if the project were approved. Members of the public often have noise concerns related to data center operations. MPCA notes statements in the Noise section of the EAW indicate further noise evaluation will be completed, and noise mitigations may be incorporated into project design. Please contact Lauren Dickerson at lauren.dickerson@state.mn.us for any further questions or concerns.	Comment noted. As noted in the EAW, further noise analysis will be completed once design progresses for the proposed project and equipment is selected for project design. The project will be required to meet the state noise standards during operations.
Air Quality	

Comment	Response
Section 17.1 of the EAW does not offer any substantiative information on the project or its emissions with respect to air quality. The section is deficient. The Project Proposer should add material information regarding the nature of the project. Other sections of the EAW suggest the Project will include power generation in the form of either diesel or natural gas. These emission units, their emissions, and the impacts of those emissions should be discussed in Section 17.	Comment Noted. The EAW has been updated. Stationary source air emissions for the proposed buildings are anticipated to be minimal based on the anticipated mechanical equipment that will be installed. The proposed project will employ back-up emergency generation to provide power to the critical infrastructure of the facility during power outages. It is not known at this time what size, type, and quantity of back up emergency generators will be utilized by the project; therefore, two technologies were analyzed for the greenhouse gas emissions section. Once more information is known for the site, a full air quality analysis will be completed, coordination with the Minnesota Pollution Control Agency (MPCA) will occur, and any anticipated permits will be obtained from the MPCA. If the emissions exceed a mandatory EAW threshold, an additional environmental review will be completed.

3. City of Faribault – Community Members Comments/Questions

Comment	Response
<i>Teresa DeMars</i> On page seven, the EAW proposes several ideas to improve the climate considerations and adaptations for the proposed project. These include: "energy efficient appliances and lighting may be used," "energy efficient data center cooling may be used," "wind power may be considered",	The project developer intends to utilize energy efficient site appurtenances and features whenever feasible. At this stage of development and design, it is not possible to make commitments as to the specific

Comment	Response
and “native trees may be considered”. Please change the language to “will be used”. Make the actual commitment to implement the climate considerations and adaptations instead of just talking about them. Saying you “may” do something means nothing.	solutions employed. Developer is happy to discuss the design and development process directly.
Teresa DeMars On page 10, it talks about 169 new trees to be planted on 9.3 acres. How is this number of trees determined? City of Faribault ordinance? Please clarify.	Comment noted. The project proposer is working with the city to confirm the landscape plan including new trees to be planted is in compliance with city ordinances.
Teresa DeMars On page 18, the water appropriation that may be potentially used to cool the data center is explained. Depending on the system, it may range from 16,500 gallons GPD to a max of 280,000 gallons GPD. On page 16, the wastewater of the system is listed at a range of 13,500 GPD to a max of 30,000 GPD. If 16,500 GPD of appropriated water results in 13,000 GPD of waste, how can 280,000 GPD only result in 30,000 GPD? Is 250,000 gallons GPD lost to the atmosphere in the process? Using a proportional equation, the waste on a day when you are using 280,000 GPD of water would be closer to 229,000 GPD. Losing 250,000 GPD of water seems off to me. Please explain and clarify. Also, when it comes to wastewater, are there any chemicals in it that are getting discharged, or is it pure water? Please clarify.	Comment noted. The type of cooling system employed will impact the amount of water used and wastewater generated by the development. The developer intends to utilize the most efficient cooling technology that is feasible, but because the ultimate system is not yet known, a range is provided with the information known at this time which includes the possibility for a closed-loop system as well as adiabatic systems which employ evaporation. The wastewater discharge is both domestic sewage and industrial wastewater; industrial wastewater discharge will meet state and local discharge standards.
Teresa DeMars On page 22, the calcareous fen is discussed. Where is it located? Is it on the property or on a neighboring property? Given the shallow depths to groundwater in the project area, who will be monitoring the calcareous fen to make sure it is not affected by the project? Please clarify.	Comment noted. The calcareous fen has been identified within the project vicinity; however, not located within the project limits. The developer will continue to work

Comment	Response
	with the DNR to confirm the project will have no effect on the calcareous fen.
<i>Teresa DeMars</i> On page 23, native seeding for the Rusty Patch Bumble Bee is discussed, yet it's not really listed as an outcome in Table Three on page ten under cover types. There are no acres listed under grasslands (I would change that to prairie or include a separate section for prairie.) Or does this fall under green infrastructure? Or planting native trees? If you are planting native prairie, please indicate the number of acres and highlight it on Table Three. Please provide more information on the native plantings. Planting native is a positive, so take credit for it on Table three.	Comment noted. The landscaping to be planted onsite may include native plantings to promote pollinator species; however, will not consist of a native prairie.
<i>Teresa DeMars</i> On page 23, the clearing of 2 acres of trees during the winter is discussed, so as not to disturb Rusty Patch Bumble Bee habitat. In Table three, it indicates 8.3 acres of trees will be cleared. What are the plans for clearing the remaining 6.3 acres of trees? Will they be cleared in the winter? Or will they be cleared during a time that will affect the Rusty Patch Bumble Bee? Please explain and clarify.	Comment noted. The proposed project will consist of approximately 10 acres of tree removal. Coordination with the USFWS has been completed to determine no adverse impact on the listed species.
<i>Teresa DeMars</i> On page 28, mitigations to reduce the project's GHG emissions are discussed. It lists things like "energy efficient building shells," "planting trees," and "onsite wind power." Again, I would like to see a commitment to these practices. Saying you might do them means nothing. Also, the city's landscaping ordinance is based more on beautification rather than carbon storage. Planting trees based on it would be the bare minimum. What will the energy impact be on the grid? How much energy will the Data Center use? How does that compare with other Faribault industries like Faribault Foods or the Jennie-O Turkey plant?	Comment noted. Energy impact to the grid is not something that is reviewed and addressed in an EAW. The project proposer has worked extensively with Steele Waseca Co-Op Electric and Great River Energy (which has in turn coordinated with MISO) on power procurement and availability. The proposed project does not exceed the mandatory EIS thresholds (which can be found here https://www.revisor.mn.gov/rules/4410.440)

Comment	Response
Finally, how do you know an EIS is not needed? What is the standard for this? I need to hear the reasoning behind that conclusion, not just that one is not needed.	0/) and has completed the necessary level of review.
Piper Nelson Data center resource consumption is extreme. Assuming this data center will be about 395,000sqft, we can estimate that the water consumption at this site will be between 30-40,000 gallons PER DAY. Because we live in a climate that has hot and humid seasons, that amount of water will greatly increase during the hotter months. Water is one of our greatest resources and it is a shame to waste fresh, clean, drinkable water on cooling computers.	Comment noted.
Piper Nelson Maybe 30,000-40,000 gallons of water per day does not seem like a lot for such a facility, but we must consider the many other facilities that also consume water from the shared aquifer we all sit on. The Prairie du Chien-Jordan aquifer runs across multiple states and provides water to many communities in southern Minnesota. Besides commercial, governmental, agricultural, and residential stressors that already exist for this aquifer, there are more and new stressors: the Niagara Bottling company in Elko/New Market estimated to consume 310,000,000 gallons of water/year (for now); proposed Limestone Quarry in Waterford which would potentially dewater pockets of the aquifer; and the two hyperscale data centers approved/being approved in Farmington which will consume between 10,000,000-16,000,000 gallons of water per day combined. There are currently 44 data centers in Minnesota-- listing each of the data centers that suck water from the Jordan aquifer would make this email much longer than either of us want so I have created a hyperlink for your convenience. Additionally, 1 in 5 Minnesotans live on a well. Drastically increasing water consumption from the aquifer could lead to some residents needing to drill deeper wells as the water table drops. This is not a cost burden for the data center, but it is one for residents, your constituents. The cost of drilling a well is not a small one; the average cost of drilling a well is between \$6,000-20,000, at \$35-84/ft.	Comment noted. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.
Piper Nelson Utility rates will increase for everyone. Due to the major utility use increase, every rate payer will	Comment noted.

Comment	Response
bear the cost burden of this new data center. This data center will receive discounted rates for the amount of resources they consume while simultaneously increasing the rate residents and commercial buildings pay, especially during peak utility usage. If transmission lines need to be built and new water lines need to be placed/replaced, the rate and tax payer is on the hook for this cost as well, not the data center. Additionally, if our energy consumption increases, more energy may need to be sourced from Manitoba, Canada which would be subject to tariffs.	
Piper Nelson This data center is proposed for a parcel that is raw, undeveloped land. Once land is developed, it can never go back to being undeveloped. That land is changed forever in every aspect down to the soil aggregates.	Comment noted.
Piper Nelson Data centers receive massive tax breaks in the state of Minnesota. Data centers across Minnesota are sales tax exempt for computers, enterprise information technology equipment, and electricity used to operate the data center for 35 years. Based on how quickly our technology develops and advances, data centers could become obsolete in the next 10 years and the state/city may never collect these taxes promised to the public benefit.	Comment noted.
Piper Nelson Additional pollution will be added to the air from the on-site diesel generators. All data centers have backup generators for situations where electricity may not be accessible for a period of time. These generators are tested and run for hours monthly as part of a maintenance routine.	Stationary source air emissions for the proposed buildings are anticipated to be minimal based on the anticipated mechanical equipment that will be installed. The proposed project will employ back-up emergency generation to provide power to the critical infrastructure of the facility during power outages. It is not known at this time what size, type, and quantity of back up emergency generators will be utilized by the project; therefore, two technologies were analyzed for the greenhouse gas emissions section. Once

Comment	Response
	more information is known for the site, a full air quality analysis will be completed, coordination with the Minnesota Pollution Control Agency (MPCA) will occur, and any anticipated permits will be obtained from the MPCA.
Ann & Karl Vohs -Will the public have a chance to attend a discussion about the data center and ask questions? -How does the public stay informed about the progress of this project?	Comment noted. The proposed project will need to obtain permits and approvals by the City and will be discussed at future public meetings. The developer will also be willing to have a direct discussion to address any questions.
Ann & Karl Vohs How will we know what kind of water usage will be decided on and should this be determined before construction?	Comment noted. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.
Ann & Karl Vohs -What kind of solid waste will be generated? What will the impact be on our landfill? -Can e waste be recycled?	Comment noted. Typical solid waste from an industrial facility will be generated by the proposed development. The development will have a recycling and waste disposal plan.
Ann & Karl Vohs -Who pays for the water and sewer connections to the site?	Comment noted. Information on land use and water is included in the EAW. The proposed project may consist of some type

Comment	Response
-How will the public know what the auxiliary power sources will be? Did the 2040 plan consider data centers and how many? -Has there been a pump test done? -What amount in megawatts would the backup generators produce in total?	of back up emergency generator to provide power to the critical infrastructure of the facility during power outages. It is not known at this time what size, type, and quantity of back up emergency generators will be utilized by the project;
Susan E. An Environmental Impact Statement needs to be done.	Comment noted. The proposed project did not exceed the mandatory category for an EIS, which can be found here: https://www.revisor.mn.gov/rules/4410.4400/
Susan E. Following the trajectory of the development path we're on is simply not sustainable. This will be built on wetlands and wooded areas in a not very environmentally friendly way. How much are we willing to keep destroying nature to feed this path we are on? Because this will probably keep growing.	Comment noted.
Susan E. Ai and other digital tools can be good if used wisely. But in very large part, they are not. And the cost to our environment is just too great.	Comment noted.
Susan E. We need to just Slow Down! Do more research on the consequences of this rapid growth. This is all new territory for us and so far, it's been less than stellar. An Environmental Impact Statement must be done, along with open meetings with the community and environmental experts outside the business and other entities profiting from this venture!	Comment noted.
Susan E. And we need to be assured that this community won't end up paying the costs of it -	Comment noted.

Comment	Response
environmentally, but also, no tax breaks for these people who can afford to pay millions to buy the land and build!	
Elizabeth Wright I live in rural Faribault about 6 miles out of town on highway 60. I am concerned about the proposed Data Center for Faribault. I know it is important to attract new industry to the area. But, once built, data centers do not employ a lot of people. What I am more concerned about is depletion of water resources. We have our own well, as do many people outside of the Faribault city limits. How can water usage for the data center be assessed? How can residents of the city as well as the surrounding homes be assured the water table will not be affected adversely? Water seems like a cheap commodity until a new well has to be drilled. Please be prudent when making any decision that will affect the aquifer. Some things are "priceless." Potable water is one of them. Is there any way to "recycle" treated water from the sewage treatment plant for reuse in the data center?	Comment noted. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.
Emily Nesvold Please look into the cooling process patented by Liquid Cool Solutions, in Rochester MN. They use a rack based technology, which is considered to be easier on the environment.	Comment noted.
Emily Nesvold Please change to "Measures to get rid of noxious and/or invasive weeds, rather than avoid spreading them.	Comment noted.
Emily Nesvold Please do not consider a tax break for Albers. If this goes through, they should be taxed significantly. They have the money and would make a huge profit.	Comment noted.
Emily Nesvold	Comment noted. The proposed project will be required to be in compliance with state

Comment	Response
I have great concerns about the impact on the people of the city of Faribault from this proposed Data Center due to noise which can shake homes nearby, constant light, and depletion of the water table.	noise standards and meeting lighting standards set by the city. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.
Jessica Navarro While I understand the potential economic interest in such a development, I am deeply concerned about the lack of meaningful community engagement and communication around this project. Many Faribault residents—particularly Spanish-speaking and Somali-speaking families—have been left entirely out of the conversation. These communities make up a significant portion of our city’s population and also contribute to the local economy through taxes and labor. Yet, none of the information related to the project appears to be translated or made accessible to them in a culturally competent manner. Not on the Faribault City page or the data centers. https://www.ci.faribault.mn.us/CivicAlerts.aspx?AID=580 https://www.archerdatacenters.com/all-locations?fbclid=IwQ0xDSwKoD7BleHRuA2FlbQlXMQABHj0LtjfGhRcmSFSY1XZFdcYJph64ney_lqdYjeq9_F97eHSz5_dUa7xT4SMJA_aem_difnym2MZ_lgsC3xmDv41A	Comment noted. The developer will also be willing to have a direct discussion to address any questions.
Jessica Navarro Additionally, I’d like to point out that even on Archer Datacenters’ official website, this project is referred to as being located in “Minneapolis,” not Faribault. This not only misrepresents our community but also reinforces the perception that this development is being planned without transparency or genuine local consideration.	Comment noted.

Comment	Response
Jessica Navarro There are also real concerns about the environmental impact—especially related to electricity and water usage. Many families in Faribault are already struggling with the high cost of utilities and daily necessities. Introducing a project of this scale without clearly addressing its potential burden on local resources raises serious equity and sustainability questions.	Comment noted. Utility rates are not addressed in an EAW. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.
Jessica Navarro As you continue to develop and we grow as a community, you must ensure that new projects are not just profitable, but equitable—lifting up all residents, especially those who are most vulnerable. I urge decision-makers and stakeholders to reconsider how this project is being introduced and to take immediate steps to involve the community in a more inclusive, transparent, and respectful manner.	Comment noted.
Sonny Wasilowski Energy Systems and Emissions The EAW mentions general strategies for efficiency but does not commit to implementation of geothermal heating and cooling systems. Given the scale and energy intensity of data center operations, I strongly recommend requiring geothermal infrastructure for each of the six planned buildings, not just a pilot or single-use case.	Comment noted.
Sonny Wasilowski Minimizing Footprint through Smarter Design	Comment noted.

Comment	Response
A sprawling, single-story layout is environmentally inefficient. If true vertical development is not feasible, I urge the City to strongly encourage the proposer to incorporate subterranean or earth-sheltered construction. A sub-level plus one-floor approach would reduce land disturbance, preserve more natural cover, and support energy efficiency through natural insulation. These designs also better align with Faribault’s desire for long-term environmental stewardship.	
<i>Sonny Wasilowski</i> Renewable Energy Integration The EAW includes only vague references to potential wind or solar use. I strongly encourage clear commitments to maximizing solar panels and small wind systems—with small intentionally noted to avoid large-scale industrial turbines incompatible with the area’s character. Renewable generation should be a foundational element, not an optional add-on.	Comment noted.
<i>Sonny Wasilowski</i> Parking Lot Scale and Heat Island Mitigation The anticipated surface parking area appears excessive for the expected traffic volume. Large, underused lots become heat islands, detract from visual quality, and worsen runoff. The project should pursue the smallest practical parking footprint, use permeable or reflective materials, and explore structured or shared-use designs that reduce sprawl.	Comment noted.
<i>Sonny Wasilowski</i> Native Landscaping and Tree Canopy I encourage a greater emphasis on biodiverse native plantings, including a higher proportion of female trees to help alleviate seasonal allergy burdens in the community. Additionally, the site should avoid standard turf lawns and instead use native lawn mixes or low-maintenance groundcover to minimize mowing, watering, and chemical use.	Comment noted.
<i>Sonny Wasilowski</i>	Comment noted. The project proposer is considering different systems as they work

Comment	Response
Water Conservation and Reuse The EAW does not present a meaningful plan to capture and reuse rainwater or recycle greywater from operations or HVAC systems. These systems should be prioritized to reduce demand on municipal infrastructure and to align with sustainable site practices.	through the design of the proposed development
Kelly Howell My main concern is water usage and sustainability. Data centers are well known for their overconsumption of water and electricity. (as seen here, 1, 2) I am concerned that this will not only negatively impact our groundwater, but also put stress on our water infrastructure, reducing resources for the community and citizens. (3, 4) The city's primary focus should be on protecting the interests of its citizens, and I do not see how taking away resources while potentially increasing our utility bills for said resources does that. That is the potential impact of this data center.	Comment noted. The project proposer has worked extensively with Steele Waseca Co-Op Electric and Great River Energy (which has in turn coordinated with MISO) on power procurement and availability. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.
Kelly Howell If the city approves this data center I would encourage the city to do its due diligence and ask hard questions of the company about how they expect to reduce the center's impact on our resources, especially in regards to minimizing water waste and pollution. And if the center ends up drawing more than their fair share of resources, and impacting the citizens, I'd urge the city to put its citizens' needs first above that of industry. Clean, available water is a human right and we should not put corporations before the safety and happiness of our citizens and community. I believe the potential negative impacts (overconsumption of resources, pollution, noise, loss of farmland etc) of allowing a data center to be built here outweigh the potential benefits	Comment noted.

Comment	Response
(temporary job growth)	

4. City of Faribault

Comment	Response
Environmental Commission	
There was a cold storage project with refrigeration and freezers in Bridgewater Township between Faribault and Northfield. That project said it would have approximately 18,942 Tons of CO2e/year (EQB Monitor Search). A limestone quarry project in Waterford Township north of Northfield is at about 2,694 Tons of CO2e/year (EQB Monitor Search). The BCA is building a new center in Mankato is at about 1,228 Tons of CO2e/year (EQB Monitor Search). Again, the Archer Datacenter is at about 529,000 tons of CO2e/year.	Comment noted. There was an error in the calculation provided; this has been updated in the EAW.
There was also 192 ac. of low density development (459 units) in Savage (EQB Monitor Search) that I took a look at. It didn't have any numbers for CO2e, but it did say that it was going to use between 409,000 gallons / day (GPD) and 475,000 GPD, and about 4,136 T/year of waste.	Comment noted.
I spoke with Travis Block with Public Works to get some water usages / wastewater discharges from other local businesses. Average amounts for April include about 435,000 GPD for Faribault Foods, 927,000 GPD for Jennie-O, 286,000 for the Faribault Correctional Facility, and 73,000 GPD for the Faribault Energy Park. Again, the Archer Datacenter would be up to and at most 280,000 GPD.	Comment noted. The project proposer continues to work with the City to understand water capacity for the city. The city will continue to work with the project proposer to determine the water needs for the project and to confirm they are within the limits of their existing water appropriation permit or the City will need to amend their appropriation permit. A water appropriation permit amendment would be reviewed and approved by the DNR.

Comment		Response																																										
Environmental Commission																																												
Otherwise, comparing apples to apples, I found information on datacenters planned for Farmington, Cannon Falls and Rosemount, and compared them to the Archer Datacenter planned in Faribault. I know the amount of power was also brought up at the last Environmental Commission meeting, and we acknowledged that the EAW did not address the amount of power needed to run the datacenter. I did a quick search and found a Star Tribune article from January that has the amount of power needed for the proposed datacenters around Minnesota. Minnesota data centers power needs could be staggering It says that the Archer Datacenters would use about 120 megawatts (MW). For context, 100 MW is roughly the amount of energy used by 100,000 households. For more context, the Archer Datacenters would use close to the lowest amount of energy of the proposed datacenters in Minnesota (including 500MW in Cannon Falls, 500 MW in Farmington, 150-250 MW in Hampton, 500 MW in Rosemount and 10-150+ in Rosemount, and 300-500 MW in Mankato).		Comment noted. The project proposer has worked extensively with Steele Waseca Co-Op Electric and Great River Energy (which has in turn coordinated with MISO) on power procurement and availability.																																										
<table><tr><td></td><td></td><td>GHG Emissions</td><td>Solid Waste</td><td>Water/Wastewater</td><td>Energy</td></tr><tr><td>Location</td><td>Size (sq. ft.)</td><td>(CO2e)</td><td>(T/yr.)</td><td>(Gallons Per Day)</td><td>(megawatts)</td></tr><tr><td>Rosemount</td><td>4,000,000</td><td>56,164</td><td></td><td>10,000 - 100,000</td><td>150</td></tr><tr><td>Farmington</td><td>2,530,000</td><td>26,943</td><td>2,184</td><td>2,350,000</td><td>500</td></tr><tr><td>Cannon Falls</td><td>1,750,000</td><td>20,189</td><td>22,500</td><td>57,000 - 3,300,000</td><td>500</td></tr><tr><td>Hampton</td><td>1,500,000</td><td>21,637</td><td>22,500</td><td>34,000</td><td>250</td></tr><tr><td>Archer - Faribault</td><td>500,000</td><td>529,632</td><td>7,500</td><td>280,000</td><td>120</td></tr></table> Of note on the table is the Rosemount Industrial Alternative Urban Areawide Review (AWAR) Update. They said that there was no change in the solid waste with the update, and it didn't say (or I couldn't find) the original amount for solid waste. Also at the Rosemount site, they said they were using an air-cooled system for cooling, so the water amount is considerably less for the size of the facility.				GHG Emissions	Solid Waste	Water/Wastewater	Energy	Location	Size (sq. ft.)	(CO2e)	(T/yr.)	(Gallons Per Day)	(megawatts)	Rosemount	4,000,000	56,164		10,000 - 100,000	150	Farmington	2,530,000	26,943	2,184	2,350,000	500	Cannon Falls	1,750,000	20,189	22,500	57,000 - 3,300,000	500	Hampton	1,500,000	21,637	22,500	34,000	250	Archer - Faribault	500,000	529,632	7,500	280,000	120	Comment noted. The developer intends to be as efficient as possible as it relates to technologies implemented for backup generation and cooling technology. These will ultimately be informed by certain customer specifications which are unknown at this time. For this reason, we made reasonable assumptions and provided a range of outcomes where appropriate.
		GHG Emissions	Solid Waste	Water/Wastewater	Energy																																							
Location	Size (sq. ft.)	(CO2e)	(T/yr.)	(Gallons Per Day)	(megawatts)																																							
Rosemount	4,000,000	56,164		10,000 - 100,000	150																																							
Farmington	2,530,000	26,943	2,184	2,350,000	500																																							
Cannon Falls	1,750,000	20,189	22,500	57,000 - 3,300,000	500																																							
Hampton	1,500,000	21,637	22,500	34,000	250																																							
Archer - Faribault	500,000	529,632	7,500	280,000	120																																							

Comment	Response
<i>Environmental Commission</i>	
I did ask Harry to see why the Archer Datacenter has so much more CO2e compared to the others in the area. He was going to follow up with Kimley Horn, the consultant that was hired for all the datacenter EAW / AWARs.	Comment noted. There was an error in the calculation provided; this has been updated in the EAW.

FARIBAULT CAMPUS

Findings of Fact and Record of Decision

City of Faribault
July 2025

1. Administrative Background

The Archer Datacenters Faribault Campus project is south of 150th Street West and east of Acorn Trail in Faribault, Rice County, MN. The site consists of one parcel of approximately 84.3 acres of agricultural and undeveloped woodland. Archer Datacenters proposes to develop the study area from existing agriculture to up to 500,000 square feet of data center buildings with associated utilities and parking lot. The City of Faribault is the Responsible Governmental Unit (RGU) for this project. An Environmental Assessment Worksheet (EAW) has been prepared in accordance with Minnesota Rules Chapter 4410. The EAW was mandatory per Minnesota Rules, part 4410.4300, subpart 14: Industrial Projects.

The EAW was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comment to the required distribution list. A notice of availability was published in the *EQB Monitor* on May 20, 2025. This notice included a description of the project, information on where copies of the EAW were available, and invited the public to provide comments.

The EAW was made available at the City Hall and on the City's website.

The EAW comment period extended from May 20 to June, 20, 2025. Written comments were received from two agencies. All comments received were considered in determining the potential for significant environmental impacts.

Based on the information in the record, which is composed of the EAW for the proposed project, the comments submitted during the public comment period, the responses to comments, and other supporting documents, the City of Faribault makes the following Findings of Fact and Conclusions.

2. Findings of Fact

2.1 Project Description

The Archer Datacenters Faribault Campus project is south of 150th Street West and east of Acorn Trail in Faribault, Rice County, MN (See Figure 1). The site consists of one parcel and approximately 84.3 acres of farmstead, agricultural and undeveloped woodland.

The proposed project includes removal of the existing farmstead and construction of up to 500,000 square feet of new one-story data center buildings with associated parking and landscape improvements and one substation. Up to six data center buildings will be constructed.

The proposed site requires City of Faribault public water and sanitary line extensions in Acorn Trail and will use directional drilling during construction to minimize environmental impacts. Onsite infrastructure improvements include sanitary sewer, water lines, storm sewer, three stormwater ponds, and electric lines. Two secured entries will be installed along Acorn Trail to access the site. Minimally invasive construction techniques will be used to minimize environmental impacts.

2.2 Corrections to the EAW or Changes to the Project since the EAW was Published

Corrections and clarifications have been made to the EAW based on comment received on the EAW. The EAW has been updated is included in Appendix A.

2.3 Agency and Public Comments on the EAW

During the comment period, the City of Faribault received two written comment letters from the following agencies:

- Minnesota Pollution Control Agency (MPCA)
- Minnesota Department of Natural Resources (DNR)

Consistent with state environmental rules, responses have been prepared below for all substantive comments received during the comment period. The comment responses are included in Appendix B. Original comments in their entirety are included in Appendix C.

2.4 Decision Regarding Need for an Environmental Impact Statement

The City of Faribault finds that the analysis completed for the EAW and the additional information considered in this document of findings of fact and conclusions are adequate to determine whether the project has the potential for significant environmental effects based on consideration of the four criteria identified in Minnesota Rules, part 4410, subpart 7.

2.4.1 Type, Extent and Reversibility of Impacts

The City of Faribault finds that the analysis completed for the EAW is adequate to determine whether the project has the potential for significant environmental effects. The EAW described the type and extent of impacts to the natural and built environment anticipated to result from the proposed project. Based on the EAW analysis and mitigation commitments, the proposed project is not anticipated to result in substantial impacts.

2.4.2 Cumulative Potential Effects of Related or Anticipated Future Projects

Cumulative effects result from the incremental impact of the proposed project when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions.

2.4.3 Extent to which the Environmental Effects are Subject to Mitigation by the Ongoing Public Regulatory Authority

The mitigation of environmental impacts will be designed and implemented in coordination with regulatory agencies and will be subject to the plan approval and permitting process. Permits and approvals that have been obtained or may be required prior to project construction are shown below:

Unit of Government	Type of Application	Status
Federal	U.S. Army Corps of Engineers (USACE) Section 404 Delineation Concurrence	Approved
State of Minnesota	MN DLI Onsite Plumbing Permit	Approved
	Minnesota Pollution Control Agency (MPCA) Sanitary Sewer Extension	To be applied for
	MPCA Construction Contingency Plan and Response Action Plan approval	To be applied for, if applicable
	MPCA Section 401 Certification	To be applied for, if applicable
	Minnesota Department of Natural Resources Temporary Water Appropriation Permit for Construction Dewatering	To be applied for, if applicable
	Minnesota Department of Health Watermain Installation Permit	To be applied for
	MPCA NPDES	To be applied for
	MPCA Air Registration Permit	To be applied for
	Minnesota Department of Natural Resources No-Effect Concurrence Determination	To be applied for
City of Faribault	Preliminary Plat	To be applied for
	Final Plat	To be applied for
	Mass Grading	To be applied for
	Site Plan Review	To be applied for
	Building Permit	To be applied for
Rice County	Work in ROW	To be applied for
	Soil and Water Conservation District (SWCD) Wetland Conservation Act Permit	To be applied for

Unit of Government	Type of Application	Status
	Utility Permit	To be applied for
	Driveway Permit	To be applied for

2.4.4 Extent to which Environmental Effects can be Anticipated and Controlled as a Result of Other Environmental Studies

The City of Faribault has previous development experience, and no problems are anticipated that city staff have not encountered or successfully solved previously in similar projects in or near the project area. The City of Faribault finds that the environmental effects of the project can be anticipated and controlled as a result of environmental review and experience on similar projects.

3. Conclusions

1. All requirements for environmental review of the proposed project have been met.
2. The EAW and the permit development processes related to the project have generated information that is adequate to determine whether the project has the potential for significant environmental effects.
3. Areas where potential environmental effects have been identified will be addressed during the final design of the project. Mitigation will be provided where impacts are expected to result from project construction, operation, or maintenance. Mitigation measures are incorporated into project design and have been or will be coordinated with state and federal agencies during the permit process.
4. Based on the criteria in Minnesota Rules, part 4410.1700, the project does not have the potential for significant environmental effects.
5. **An environmental impact statement is not required for the proposed project.**

Appendix A

Revised EAW

Appendix B

Comment Responses

Appendix C

Comment Letters



Environmental Commission Memorandum

TO: Environmental Commission
THROUGH: David Wanberg, Community & Economic Development Director
FROM: Adam King, Environmental and Water Resource Coordinator
MEETING DATE: July 28, 2025
SUBJECT: Energy Action Plan Implementation Update

Background:

As a part of implementing the Energy Action Plan, Excel Energy and Partners in Energy have been meeting with City of Faribault staff to check in on any activities that are occurring related to energy. Partners in Energy has provided a Community Dashboard to the City of Faribault showing energy use in the community through 2024 and comparing it to our Energy Action Plan goals relating to electricity, gas, energy efficiency programs and avoided emissions, and looking at 2023 vs. 2024.

Attached are the Partners in Energy Executive Summary for 2024, and the Data Dashboard with data through 2024.

Recommendation:

Attachments:

1. Faribault PIE Executive Summary 2024 Q4
2. Faribault PIE Data Dashboard 2024 Q4

Faribault Partners in Energy Community Dashboard 2024 Executive Summary



Data are through December 31, 2024

Faribault set the following goals:

-Avoid an additional 50% of energy-related greenhouse gas emissions by 2030 compared to business as usual, while saving the community energy and money

Baseline Year 2015

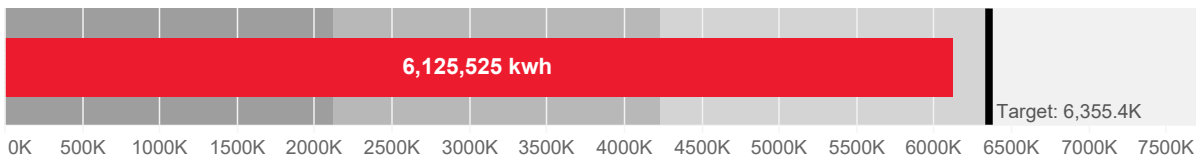
Energy Action Plan Progress Throughout Implementation

Partners in Energy Support Implementation Period: October 1, 2023 through December 31, 2025

Energy Action Plan Cumulative Impact

Faribault's progress since beginning implementation of their Energy Action Plan through energy programs

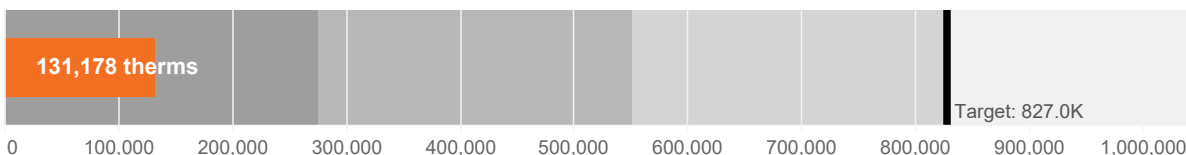
Electricity: Faribault has saved **96%** of its electricity savings implementation target.



656 homes

That's the equivalent electricity needed to power 656 average Minnesota homes for a whole year.

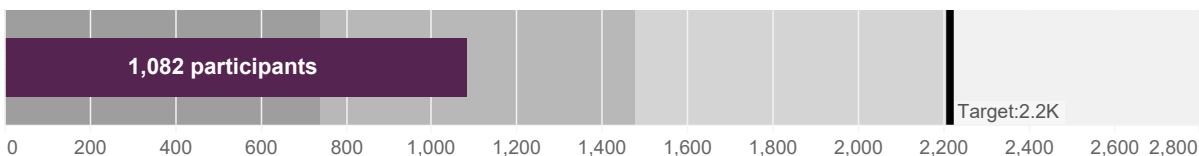
Gas: Faribault has saved **16%** of its gas savings implementation target.



166 homes

That's the equivalent gas used by 166 average Minnesota homes for a whole year.

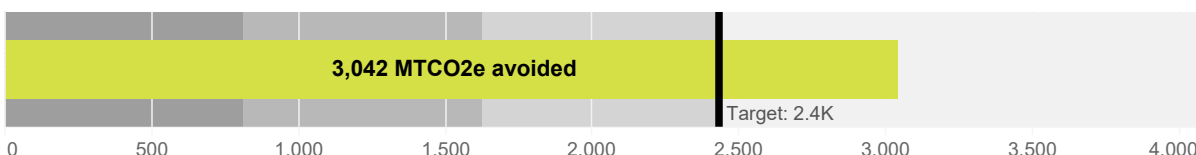
Energy Efficiency Programs: Faribault has reached **49%** of its energy efficiency program participation implementation target.



2.2%

of Faribault's premises participated in energy efficiency programs.

Avoided Emissions: Faribault has achieved **125%** of its emissions savings implementation target.



This includes impact from programs and subscriptions. This doesn't include Net Metering (rooftop solar), which can account for significant additional avoided emissions.

Colored Bar: Progress Black Line: Goal (Based on cumulative target impacts by end of implementation period)

Participation counts for rebate programs reflect Xcel Energy offerings only. Xcel Energy provides electricity and natural gas to the community.

Partners in Energy is a collaboration of the community and Xcel Energy.
GHG emission estimates may change slightly based upon third-party verification of utility emissions factors.



Faribault Partners in Energy Community Dashboard Executive Summary



2023 & 2024

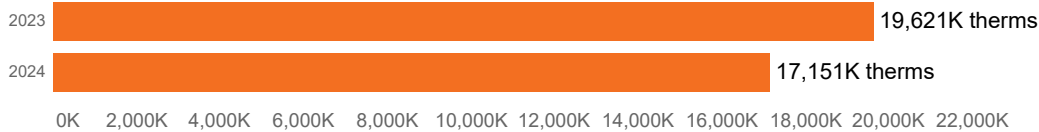
Annual Community Trends Compared to Previous Year

Electricity Use (kWh)



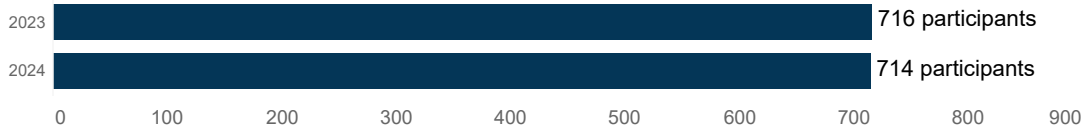
▼ 4%

Gas Use (therms)



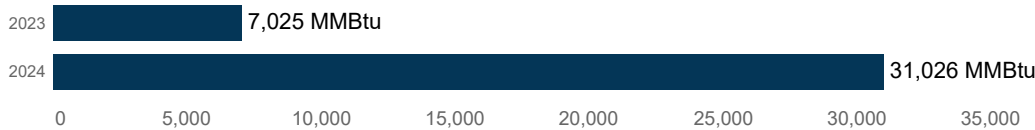
▼ 13%

Energy Efficiency Program Participation



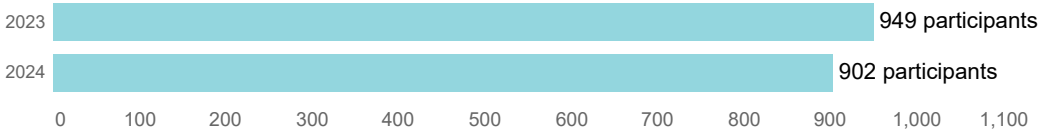
▲ 0%

Energy Efficiency Energy Savings (MMBtu)

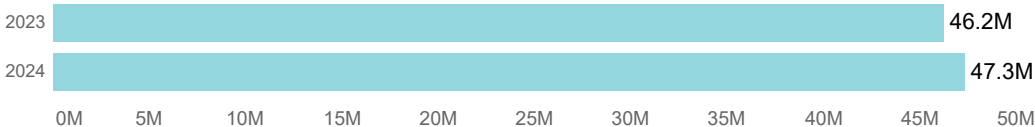


▲ 342%

Renewable Energy Program Participation



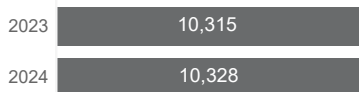
Renewable Energy Program Electricity Subscribed Amount (kWh)



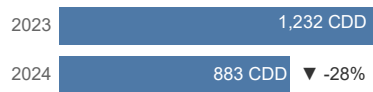
▲ 2%

Potential External Contributing Factors

Community Premise Count



Cooling and Heating Need



More cooling degree days (CDD) can lead to more electricity use More heating degree days (HDD) can lead to more gas use

Participation counts for rebate programs reflect Xcel Energy offerings only. Xcel Energy provides electricity and natural gas to the community.

Partners in Energy is a collaboration of the Community and Xcel Energy.
GHG emission estimates may change slightly based upon third-party verification of utility emissions factors.
Subscribed amount (kwh) does not include any generation for on-site solar systems.



2024 Community Data Dashboard Xcel Energy Year-End Program Summary



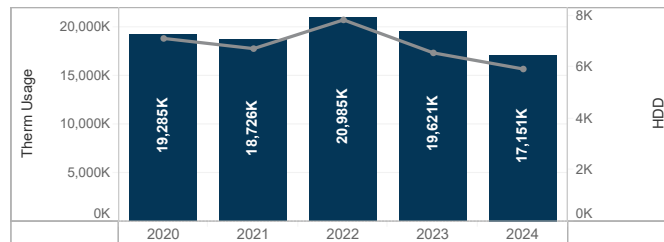
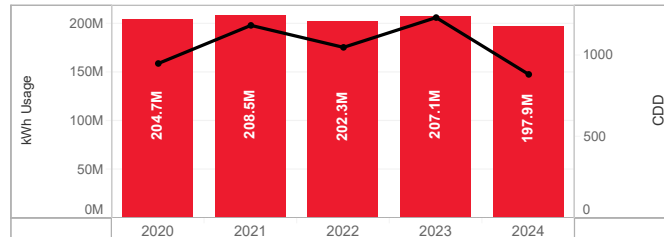
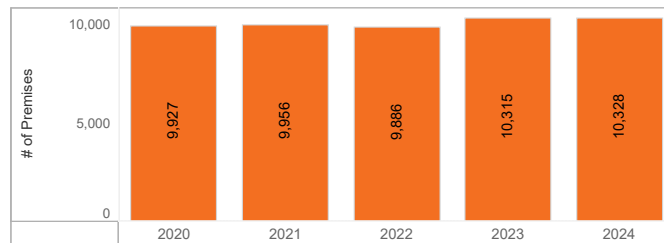
Faribault strives to:

-Avoid an additional 50% of energy-related greenhouse gas emissions by 2030 compared to business as usual, while saving the community energy and money

Baseline

2015

Utility Consumption & Premise Trends



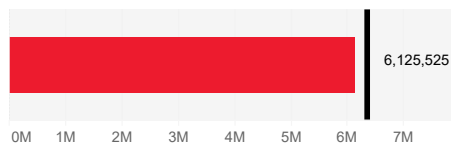
	2020	2021	2022	2023	2024
Cooling Degree Days (CDD)	950	1,184	1,049	1,232	883
Heating Degree Days (HDD)	7,128	6,731	7,849	6,565	5,938

Line: CDD/HDD totals; Colored Bar: Total Consumption & Premises
Balance Temp: 65°F; Source: www.weatherdatadepot.com and NOAA.gov

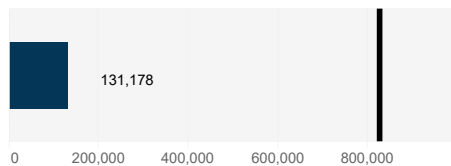
Energy Action Plan Impact

Implementation Period: October 1, 2023 to December 31, 2025

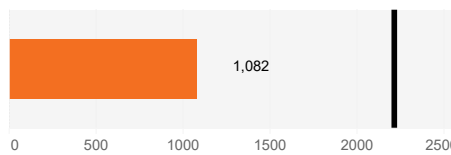
Cumulative kWh Savings



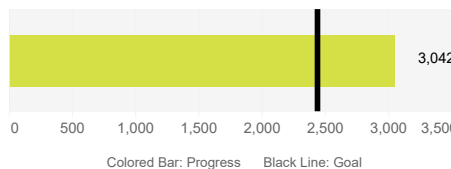
Cumulative Therm Savings



Cumulative DSM Participation



Cumulative GHG Emissions Avoided (MTCO2e)



Colored Bar: Progress Black Line: Goal

Annual Program Trends

	2020	2021	2022	2023	2024
DSM kWh Savings	3,756,249	2,391,183	1,135,808	882,424	5,648,985
DSM Therm Savings	1,513,848	43,797	228,706	40,146	115,404
DSM Participation Count	929	661	452	716	714
Total Renewable Energy Participation	812	857	904	949	902
Total Renewable Energy kWh Savings	24,108,789	41,367,844	42,490,409	46,232,648	47,323,505
Total DSM & RE GHG Savings, MT CO2e	9,353	2,019	2,582	1,225	2,839

Annual % Change

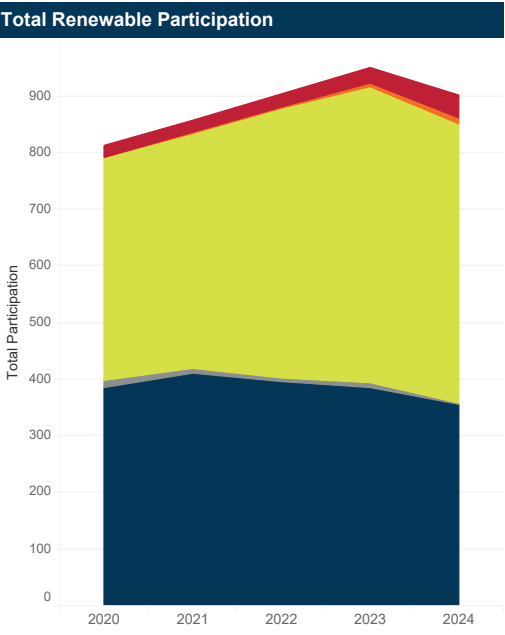
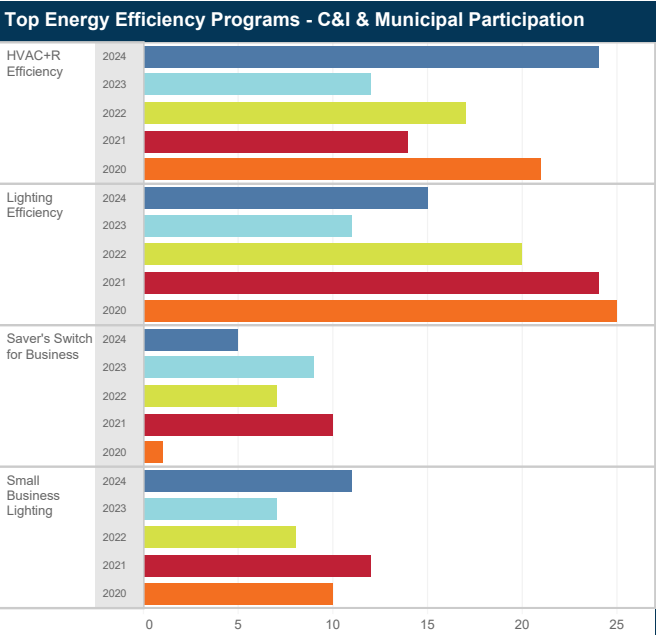
	2021	2022	2023	2024
% Change in Premise Count	0%	-1%	4%	0%
% Change in kWh Usage	2%	-3%	2%	-4%
% Change in Therm Usage	-3%	12%	-7%	-13%

Partners in Energy is a collaboration of the Community and Xcel Energy.
GHG emission estimates reflect the most accurate and current information available, but the data may change slightly after third-party verification.

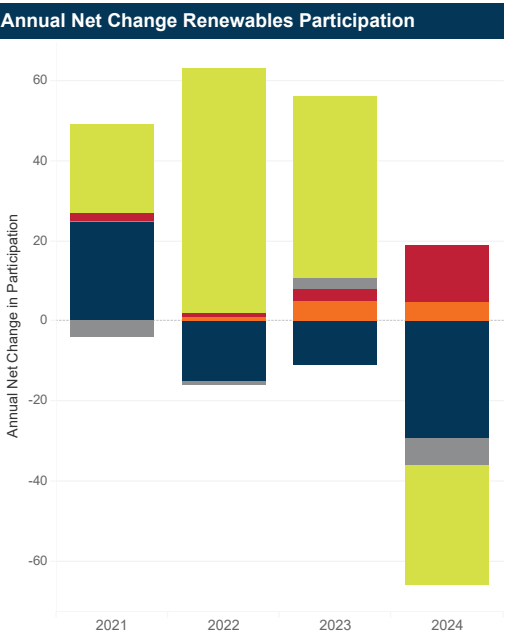
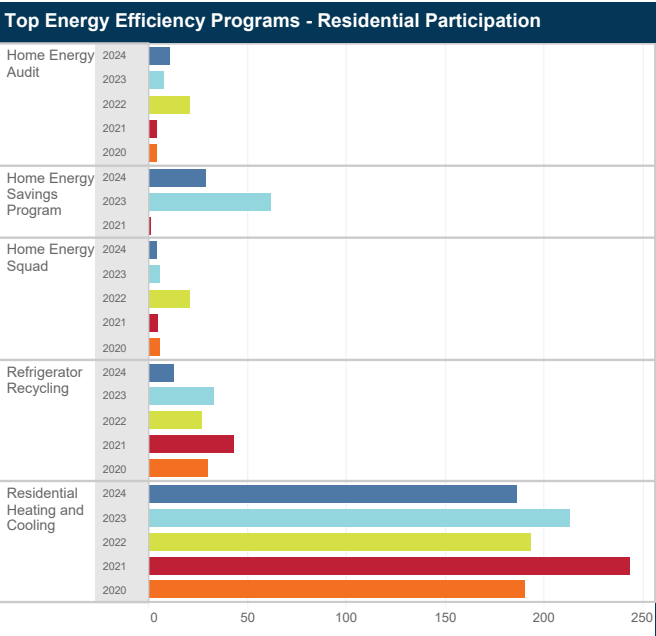
Participation counts for rebate programs reflect Xcel Energy offerings only. Xcel Energy provides electricity and natural gas to the community.



PARTNERS IN ENERGY
An Xcel Energy Community Collaboration



Implementation Metrics					
Energy Efficiency Program Participation					
	2020	2021	2022	2023	2024
Commercial & Industrial	77	92	65	59	67
Residential	852	569	387	657	647
Renewable Program Participation*					
	2020	2021	2022	2023	2024
Commercial & Industrial	77	89	91	102	97
Residential	735	768	813	847	805
Total Renewable Program kWh*					
	2020	2021	2022	2023	2024
Commercial & Industrial	21,225,646	37,833,838	38,831,271	41,693,934	42,752,739
Residential	2,883,144	3,534,006	3,659,138	4,538,714	4,508,840
Total Renewable Program Participation*					
	2020	2021	2022	2023	2024
Solar*Rewards	20	22	23	26	40
Non-Solar*Rewards Net Metering	1	1	2	7	12
Solar*Rewards Community Participation	394	416	477	522	492
Windsoruce & Renewable*Connect Flex Participation*	386	411	396	385	356
Renewable*Connect Participation*	11	7	6	9	2
Total Renewable Energy Participation	812	857	904	949	902



PARTNERS IN ENERGY
An Xcel Energy Community Collaboration

2024 Community Data Dashboard Xcel Energy Year-End Program Summary



Efficiency Program Participation

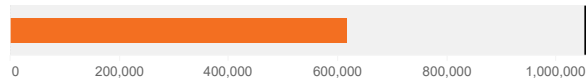
	2020	2021	2022	2023	2024
Commercial & Industrial & Municipal					2
	1	3	2		1
	1	11		7	
	4				2
				1	
	2		1		1
	1	2			
	21	14	17	12	24
				1	
	25	24	20	11	15
	1	2		4	2
		1	1	1	
			1		
	1	10	7	9	5
	10	12	8	7	11
	10	9	8	4	4
		4		2	
Total	77	92	65	59	67
Residential				9	
	4	4	21	8	11
		1		62	29
	6	5	21	6	4
			21	18	4
	5	4	7	2	4
	24	2	31	16	6
			4	76	
					7
	30	43	27	33	13
	190	243	193	213	186
	589	214	14	91	336
	4	53	48	123	47
Total	852	569	387	657	647
Grand Total	929	661	452	716	714

Implementation Progress

October 1, 2023 to December 31, 2025

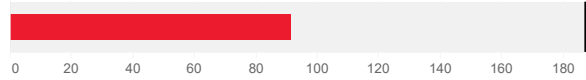
Target 1

Dollars saved through energy efficiency through December, 2025



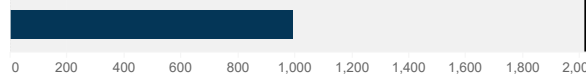
Target 2

Participation in commercial/industrial energy efficiency programs through December, 2025



Target 3

Participation in residential energy efficiency programs through December, 2025



Implementation Highlights

- Used seed grants fund to purchase home energy saving kits that could be distributed to the community. These kits include LED lightbulbs, high efficiency shower heads and plumber's tape for installation, high efficiency faucet aerators for bathroom sink, weather stripping, rope caulk, measuring stick to check to attic insulation depth, outlet gaskets
- Purchased home energy equipment kits for check-out at the Buckham Memorial Library. These includes included infrared thermometer to find areas where heated and cooled air are escaping the home; moisture meter to identify possible water leaks; and watt meter to measure how much electricity appliances use; upon special request a single-burner induction cooktop and cookware could be checked out.

Xcel Energy filed a new DSM plan in 2024 which resulted in some programs being reorganized and renamed.



ENERGY DATA GLOSSARY

Definitions

Demand Side Management (DSM): Demand side management aims to encourage consumers to decrease energy consumption. Xcel Energy offers DSM programs, like efficiency rebates and energy assessments, to help consumers reduce and shift their energy consumption.

Premise: A unique identifier for the location of electricity or natural gas service. In most cases it is a facility location. There can be multiple premises per building, and multiple premises per individual customer.

Heating Degree Days (HDD): Heating degree days (HDDs) are a measure of how cold the temperature was on a given day or during a period of days and correlates to heating demand. For example, the more HDDs there are, the higher furnace use is likely to be. This is often seen through an increase in natural gas consumption.

Cooling Degree Days (CDD): Cooling degree days (CDDs) are a measure of how hot the temperature was on a given day or during a period of days and correlates to cooling demand. For example, the more CDDs there are, the higher air conditioner use is likely to be. This is often seen through an increase in electricity consumption.

Units of Measure

Greenhouse Gases (GHG): Gases in the atmosphere that absorb and emit radiation and significantly contribute to climate change. The primary greenhouse gases in the earth's atmosphere are water vapor, carbon dioxide, methane, nitrous oxide, and ozone.

Kilowatt-hour (kWh): A unit of electricity consumption.

Therm (thm): A unit of natural gas consumption.

Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}): A unit of measure for greenhouse gas emissions. The unit "CO_{2e}" represents an amount of a greenhouse gas whose atmospheric impact has been standardized to that of one unit mass of carbon dioxide (CO₂), based on the global warming potential (GWP) of the gas.

Data Privacy

4/50 Rule: Xcel Energy applies the "4/50 rule" as an aggregation standard to the energy consumption data within this report. So long as a given aggregated value contains 4 or more customers and no single customer makes up 50 percent or more of the aggregated value, the value can be publicized in this report. If these conditions are not met, customer(s) will be removed from energy consumption data.

Renewable Energy Programs

Renewable*Connect Flex (Formerly Windsource): An Xcel Energy subscription program enabling customers to source their electricity from wind for an additional monthly cost. Annual participation is calculated as a count of unique customers in both programs.

Solar*Rewards Community: A community solar garden subscription program where customers subscribe to a nearby, third-party community solar garden. Customers receive a credit for the energy produced by the portion of the solar garden represented by their subscription. Annual participation is calculated as a count of unique customers in the program.

Renewable*Connect: An Xcel Energy subscription program enabling customers to source their electricity from solar and wind for an additional monthly cost. Annual participation is calculated as a count of unique customers in the program.

Solar*Rewards: An incentivized Xcel Energy program for on-site solar installations. Excess energy generation is sold back to Xcel Energy.

Net-Metering: A non-incentivized Xcel Energy program for on-site solar installations. Excess energy generation is sold back to Xcel Energy.

Popular Energy Efficiency Programs

Home Energy Squad: A residential energy assessment program from Xcel Energy that includes a home energy audit and installation of energy efficient materials.

Residential Heating and Cooling: A rebate program for residential customers who purchase high-efficiency heating and cooling equipment, including heat pumps, water heaters and more.

HVAC+R: A rebate program where businesses can earn rebates from Xcel Energy on high-efficiency heating, ventilation, air-conditioning, refrigeration, and more.

Small Business Energy Solutions: A free lighting and HVAC assessment program for small and medium-sized business customers.

Lighting Efficiency: Business customers can earn rebates from Xcel Energy for purchasing and installing LED lighting fixtures, bulbs, and control systems.

Check out the **Energy Terms 101** digital resource to learn more:
<https://xcelenergycommunities.com/document/energy-terms-101-0>



City of Faribault Environmental Commission 2025 Workplan

1. Maintain past projects:
 - a. Prairie planting along Crockers Creek from 7th St. N.W. to MN 60.
 - i. Enlist community volunteers/groups to assist with maintenance.
2. Control invasive plants within the city.
 - a. Glossy Buckthorn
 - b. Wild Parsnip
 - c. Thistle
3. Promote and implement pollinator habitat.
4. Promote and replace ash trees within the city.
5. Implement the Energy Action Plan, including promotion of the energy assessment kits available at the library and River Bend Nature Center.

The city will work to incorporate education/outreach, demonstration projects, community service into each of the priorities.

1. Maintain past projects.

A group has planted prairie along Crockers Creek between 7th St. N.W. and Minnesota State Highway 60. Since then, volunteer weeds including glossy buckthorn, wild parsnip and thistles have established. Continued efforts to control the glossy buckthorn and other invasives have been made by the Rotary Club and volunteers in front of the Chamber of Commerce office. Even the Faribault Fire Department assisted with controlled prairie burns. In the last few years, the maintenance has decreased and invasives have increased.

The city will work to enlist community volunteers/groups to assist with maintenance of the site, working to bring back native prairie and pollinator habitat.

2. Control invasive plants within the city.

Work with the city to maintain city owned properties that have been taken over by invasive plants including glossy buckthorn, wild parsnip, and thistles.

The city will work with partners and seek funding to remove invasive species and continue to maintain those areas to try to prevent the areas from being overtaken by invasive plants, including watching for the Cooperative Weed Management Grant.

3. Promote and implement pollinator habitat.

Work with partners to promote and implement native prairie and pollinator habitat.

The city will work with partners and seek funding to promote and implement pollinator habitat projects in the city, including the Board of Water and Soil Resources (BWSR) Lawns to Legumes grant (open through November 30, 2025), the Habitat Enhancement Landscape Program (HELP) grant, Pollinators Pathways grant and other state and federal grants.

4. Promote and replace ash trees within the city.

The Emerald Ash Borer (EAB) has devastated the ash trees in the City of Faribault. Removing and replacing large trees can be expensive and complicated when close to utilities.

The city will work with partners and seek funding to remove and replace dead and dying ash trees in the City of Faribault. The Minnesota Department of Natural Resources (MN DNR) will open their ReLeaf grant in late 2025 to assist cities in helping residents remove and replace dead and dying trees. There is also a Protect Community Forests by Managing Ash for EAB grant through the MN DNR to remove

and replace dead and dying trees on public property that we will continue to monitor for availability.

5. Implement the Energy Action Plan

The Environmental Commission has partnered with Xcel Energy, Partners in Energy, and has applied for a Clean Energy Resource Teams (CERTs) grant that has assisted with the purchase of two home energy assessment kits. One is stationed at the Library, with the other at River Bend Nature Center.

The city will continue to work promoting the home energy assessment kits at the library and River Bend Nature Center, and continue to implement all other aspects of the Energy Action Plan.

6. POSTPONED – until a decision with the Woolen Mills Dam is made.

Implement a native buffer on city property along the Cannon River Reservoir above the Woolen Mill Dam

The city will work with partners and seed funding to install and maintain a native buffer on city owned property along the Cannon River Reservoir above the Wollen Mill Dam, including the HELP grant, Pollinators pathways grants and other state and federal grants.