From: Aubree Derksen [redacted]
Sent: Monday, November 10, 2025 9:59 PM
To: MN_EQB_Info <info.EQB@state.mn.us>
Subject: public comment

I'm submitting a public comment.

Please set and enforce a state-wide moratorium on data center development, particularly hyperscale data centers until broad, robust state-level protections are in place and local governments have a chance to also learn and put in place local level protections. This moratorium will include every data center being proposed that's not yet in construction (unsure if you can stop construction of Rosemount?)

In the absence of state-level protections here is what is happening:

I'm a resident of Pine Island, which is being sued by the MCEA. The city is ignoring the lawsuit on all fronts. The development application was received by Ryan Co. and it's just as vague as the AUAR and specifically mentions that they're still using the already vague AUAR as their framework and haven't made any changes to the AUAR limitations. The development application states on p.1 "Due to the size of the development area and anticipated multi-year duration, it is not prudent for a developer to be overly prescriptive on specific uses and ultimate design of the campus." Yes, they plan to build one of the largest data centers in the state in my town but they can't possibly be "overly prescriptive" about what the development actually is or entails, even though they're being sued for not being

specific. The lawsuit itself is not enough for them to change course and actually provide specifics. The state needs to halt all data center projects.

They also state on p.7 "The PUD requests that the code requirement for compliance with MPCA noise regulations be clarified to only apply to normal operation of the facility, and that emergency power generation, scheduled maintenance, and testing of the facility would be excluded from those regulations." An AUAR is completely insufficient for data center contexts but because MN has not caught up or issued a moratorium cities are approving blanket requests from developers to be completely excused from following existing compliance measures. They request blanket immunity and local governments don't know to ask follow up questions such as: What are the expected decibels of the activities you're requesting an exemption for? How long (ie 90 minutes) and with what frequency (ie: daily) do you anticipate these activities to last? What time of day are you performing these activities? Local governments don't know that they a) shouldn't be giving blanket exemptions from state code and b) at minimum need to provide guardrails to said request (ie: an exception to noise code can be made in contexts where the test lasts less than 10 minutes and is done during daytime hours). The state needs to halt all projects.

Cannon Falls approved their data center development application on Nov 5th, despite resident objection. They have 2 water sources, the Jordan and Prairie du Chien aquifers, which have a total of 5 data centers proposed to draw from them, 4 of which are all being sued by the MCEA for not doing their due diligence. Cannon Falls did not do an EAW or EIS either, they're just not currently being sued, so that makes 5 out of 5 data centers not doing their due diligence pulling from those 2 aquifers alone, leaving Cannon Falls and every other city that draws only from those 2 sources without uncompromised drinking water sources. The Jordan aquifer alone touches 7 states-7 states that have the power to sue us at the state and local level for not doing our due diligence. All aquifers are connected as well. In the absence of state protections local governments local governments don't bother to think regionally about groundwater and they are putting our entire groundwater supply in jeopardy because they think they're going to get money. The state needs to halt all data center projects. Please issue a state-wide moratorium.

Aubree Derksen

"Not being able to speak is not the same as not having anything to say." -Rosemary Crossley

From: Toby Halladay <[redacted]>
Sent: Thursday, November 13, 2025 1:23 PM
To: MN_EQB_Info <info.EQB@state.mn.us>
Subject: Public Comment - NO Data Centers in MN!

Submission for public comment:

Please set and enforce a state-wide moratorium on data center development, particularly hyperscale data centers until broad, robust state-level protections are in place and local governments have a chance to also learn and put in place local level protections. This moratorium will include every data center being proposed that's not yet in construction (unsure if you can stop construction of Rosemount?)

In the absence of state-level protections here is what is happening:

I'm a resident of Rochester, MN. I am a neighbor to Pine Island, which is being sued by the MCEA. The city is ignoring the lawsuit on all fronts. The development application was received by Ryan Co. and it's just as vague as the AUAR and specifically mentions that they're still using the already vague AUAR as their framework and haven't made any changes to the AUAR limitations. The development application states on p.1 "Due to the size of the development area and anticipated multi-year duration, it is not prudent for a developer to be overly prescriptive on specific uses and ultimate design of the campus." Yes, they plan to build one of the largest data centers in the state in my town but they can't possibly be "overly prescriptive" about what the development actually is or entails, even

though they're being sued for not being specific. The lawsuit itself is not enough for them to change course and actually provide specifics. The state needs to halt all data center projects.

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Cannon Falls approved their data center development application on Nov 5th, despite resident objection. They have 2 water sources, the Jordan and Prairie du Chien aquifers, which have a total of 5 data centers proposed to draw from them, 4 of which are all being sued by the MCEA for not doing their due diligence. Cannon Falls did not do an EAW or EIS either, they're just not currently being sued, so that makes 5 out of 5 data centers not doing their due diligence pulling from those 2 aquifers alone, leaving Cannon Falls and every other city that draws only from those 2 sources without uncompromised drinking water sources. The Jordan aquifer alone touches 7 states-7 states that have the power to sue us at the state and local level for not doing our due diligence. All aquifers are connected as well. In the absence of state protections local governments local governments don't bother to think regionally about groundwater and they are putting our entire groundwater supply in jeopardy because they think they're going to get money. The state needs to halt all data center projects. Please issue a state-wide moratorium.

Do not hesitate any further to act against these attacks on our citizens and on our precious resources. DO NOT continue to allow large data companies to hinder our quality of life, pollute our state, and increase our utility bills.

The people of Minnesota are watching and will ensure you do the right thing.

Thanks,

Toby Halladay

From: Matt Gamble <[redacted]>
Sent: Friday, November 14, 2025 1:39 PM
To: MN_EQB_Info <info.EQB@state.mn.us>
Subject: Public comment on the Data Center meetings

I'm writing to give some more information on the potential effects of data centers on communities in the state of Minnesota. I'm the COO of EnergyPrint, a company that has spent the last 15 years helping commercial businesses better understand their energy usage and help them find ways that they can reduce the cost of their utilities.

Over the past year we have shifted focus to schools, public buildings, and non-profits, as the current administration has slashed funding to them and often left many of these institutions of having to slash programs so they could maintain the basic infrastructure of their buildings.

Rural areas are often hit the hardest by these budget cuts, as they have neither the tax base nor the political pull to find ways to cover these reductions leaving them to make the hard decisions of cutting necessary programs and services that their communities rely on.

When I attended the October Environmental Quality Board meeting, I listened to many constituents from these smaller communities express their concerns and fears about these data centers moving into their communities. It was a sobering reminder of how often we dismiss the concerns of these communities, to rather cater to the needs of the enormous companies and conglomerations that make false promises of job growth, more infrastructure, and minimal to no environmental impact.

Those statements from those companies are fabrications at best and outright lies at worst.

Those constituents expressing their concerns actually don't understand one of the greatest ways those data centers will impact their communities, and their fears are probably underselling the danger their areas face.

Data Centers will cause rates to increase; that's a statistical fact. But the residential rate, which is the most obvious to the residents that live in those areas, and which will be the first way they feel pain in their pocketbooks, is not the rate they should be most concerned about.

As I listened to that meeting, repeatedly I heard the voice of the residents, but what I didn't hear is how these data centers will affect the businesses and institutions in those areas. The rate they need to worry about is demand, which often makes up 30-60% of a building's total utility bill cost.

Deman rates, for those who are unaware, are the rates commercial and industrial buildings pay when their energy needs exceed their normal needs. It can be caused by a sudden surge of need (all the air conditioners turning on during the middle of a heat wave) or long-term consistent use during a time of extreme need (like the huge draw computer servers require 24/7, causing them to be more expensive to operate during the day when most electricity is needed). Demand rates are essential overtime rates for energy usage. But they are not time and a half like you'd get working a job, they are often 10x or more than the standard utility rate.

Data Centers are the single largest users of demand rates, and because of this operate at a huge cost and put a massive strain on a grid during times of need. Their existence in an area will cause demand rates to climb, and that is where the issue lies. Three other types of businesses that have high demand costs are schools, grocery stores, and hospitals. Their demand usages are all caused by different factors, but they are all consistently high ranking in their demand needs. So when data centers move into a small community, the cost to operate these types of buildings will increase, often exponentially.

In major metropolitan areas these demand rates can be spread out to minimize the increases, and the consumer base is large enough that while it will put a strain on their budget, it won't bankrupt them. The same can't be said for smaller towns and rural communities.

Data Centers will cause hospitals and grocery stores to close, and schools to be dramatically underfunded. Schools can at least use a referendum to perhaps recover some of that increased cost, but that would effectively mean data centers are creating a hidden tax on residents just so they can keep their schools funded.

Hospitals and grocery stores have even thinner margins for error when it comes to dramatic cost increases, and the closing of these businesses will mean people will go hungry, people will lose health care, and ultimately people will die.

This isn't to say data centers are inherently bad, but too often when I hear meetings like the one I did in October, it seems like the government is taking the companies building the data centers word that this is entirely a good thing, and failing to understand the disastrous implications these buildings can cause if you don't properly plan ahead.

I'm not even covering the deceptive claims of job growth for these properties, and the constant underselling of the environmental impact these buildings have as well.

Data Centers are not an inherently bad investment for a community, but they come with numerous financial and environmental pitfalls that must be accounted for, or you are dooming these communities for no financial and economic gain. You have to plan for every contingency to mitigate the inherent issues of these buildings, and to protect your community.

If you don't it will be nothing short of a disaster.

Matt Gamble

Chief Operating Officer