

June 3, 2026

VIA EMAIL

RE: North Zumbro Sanitary Sewer District (NZSSD) in Cities of Goodhue, Pine Island, Wanamingo, and Zumbrota, Goodhue County

Dear Interested parties:

The Minnesota Pollution Control Agency (MPCA) has approved the Findings of Fact (FOF), Conclusions of Law, and Order for a Negative Declaration (FOF) on the need for an Environmental Impact Statement (EIS) on the North Zumbro Sanitary Sewer District (NZSSD) (Project). The FOF document concludes that this project does not have the potential for significant environmental effects. The decision for a Negative Declaration completes the state environmental review process under Environmental Quality Board (EQB) rules, Minn. R. ch. 4410. Final governmental decisions on permits or approvals for the project may now be made.

The MPCA appreciates comments submitted on the Environmental Assessment Worksheet (EAW). The comments were considered by MPCA staff during the environmental review process and responses to these comments are provided in the FOF.

Interested parties can review the FOF and the EAW documents at the following locations: the MPCA office in Saint Paul; the Hennepin County Library at 300 Nicollet Mall, Minneapolis; and the Great River Regional Library at 1300 West Germain Street, St. Cloud, Minnesota. Interested parties can also view the documents on MPCA's website at: <https://www.pca.state.mn.us/business-with-us/recently-completed-mPCA-reviews>. Please contact the MPCA's Saint Paul office at 651-757-2098 for copies of these documents.

Sincerely,

Katrina Kessler

This document has been electronically signed.

Katrina Kessler, P.E.
Commissioner

KK/DH:kj/mh

Attachment

cc: See next page.

Interested parties

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cc: Jason Oberle, Tribal Liaison (w/ attachment)
Vanessa Alberto, Tribal Liaison (w/ attachment)
Michael Stansberry, Tribal Liaison (w/ attachment)
Juan Martinez, Tribal Liaison (w/ attachment)
Tribal Relations Contact, Tribal Liaison (w/ attachment)
Mike Wilson, Mille Lacs Band of Ojibwe (w/ attachment)
Charles J. Lippert, Mille Lacs Band of Ojibwe (w/ attachment)
Gabriel Miller, Prairie Island Indian Community (w/ attachment)
Noah White III, Prairie Island Indian Community (w/ attachment)
Henry Stelten, Prairie Island Indian Community (w/ attachment)
Beau Kennedy, City of Goodhue (w/attachment)
Samantha Pierret, Goodhue County Planning & Zoning Director (w/ attachment)
Jason Majerus, Goodhue County Commissioner (w/ attachment)
Ernest Valenzeuela, City of Goodhue (w/ attachment)
Lisa Redepenning, City of Goodhue (w/ attachment)
Elizabeth Howard, City of Pine Island (w/ attachment)
David Friese, City of Pine Island (w/ attachment)
Ryan Holmes, City of Wanamingo (w/ attachment)
Michael Boulton, City of Wanamingo (w/ attachment)
Todd Greseth, Wanamingo County Commissioner (w/ attachment)
Todd Hammel, City of Zumbrota (w/ attachment)
Brian Grudem, City of Zumbrota (w/ attachment)
Mike Pederson, Widseth (w/ attachment)
Craig Bigelow, Widseth (w/ attachment)
Holly Mikkelson, MPCA (w/ attachment)

**STATE OF MINNESOTA
MINNESOTA POLLUTION CONTROL AGENCY**

**In The Matter Of The Decision
On The Need For An Environmental
Impact Statement For The Proposed
North Zumbro Sanitary Sewer District (NZSSD)
Project located in the cities of Goodhue,
Pine Island, Wanamingo, and Zumbrota,
Goodhue County, Minnesota**

**FINDINGS OF FACT
CONCLUSIONS OF LAW
AND ORDER**

INTRODUCTION

Pursuant to Minn. ch. 4410, the Minnesota Pollution Control Agency (MPCA) staff prepared and distributed an Environmental Assessment Worksheet (EAW) for the proposed North Zumbro Sanitary Sewer District (NZSSD) Wastewater Treatment Facility (WWTF) (Facility) on the edge of the City of Zumbrota, with the site extending into Zumbrota Township, Goodhue County, Minnesota. Based on the MPCA staff environmental review, the EAW, comments, and information received during the comment period, and other information in the record of the MPCA, the MPCA hereby makes the following Findings of Fact, Conclusions of Law, and Order.

FINDINGS OF FACT

Project description

1. The Project involves creation of a new regional sanitary district (Project) to serve the communities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota with a combined population of approximately 10,460 residents as of 2026.
2. The Project includes construction of a new WWTF on the edge of the City of Zumbrota, with the site extending into Zumbrota Township, along with pump stations and conveyance lines (forcemains) to connect all four communities to the Facility.
3. Wastewater from the cities of Goodhue, Pine Island, Wanamingo, and Zumbrota are currently treated at four separate WWTF sites within the individual communities. Each city is facing similar issues with deterioration of facilities, which are nearing the end of their life cycles, and have elected to form a joint sanitary district, the NZSSD, to provide wastewater treatment for the four communities via a new centralized Facility.
4. The Facility would have an average wet weather capacity (AWWC) of 4.1 million gallons per day (MGD).
5. A National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Wastewater Permit application was submitted to the MPCA and deemed complete March 31, 2026. Additional permits as reflected in Section C are required for the Project.

Procedural history

6. An EAW is a brief document designed to provide the basic facts necessary for the Responsible Governmental Unit (RGU) to determine whether an Environmental Impact Statement (EIS) is required for a proposed Project or to initiate the scoping process for an EIS (Minn. R. 4410.0200, subp. 24). The MPCA is the RGU for this Project.

7. Minn. R 4410.4300, subp. 1 requires preparation of an EAW for the Project because the construction of a new municipal or domestic wastewater treatment facility with an average wet weather design flow capacity of 200,000 gallons per day or more which exceeds the threshold identified in Minn. R. 4410.4300, subp. 18(D).
8. The MPCA provided public notice of the Project as follows:
 - The Environmental Quality Board (EQB) published the Notice of Availability of the EAW for public comment in the EQB Monitor on March 31, 2026, as required by Minn. R. 4410.1500.
 - The MPCA published the EAW for review on the MPCA website at: <https://mpca.commentinput.com/comment/search>.
 - The MPCA provided a news release to media contacts in southeast Minnesota, including Rochester and Mankato, and smaller regional papers, radio stations, and TV stations on March 31, 2026.
9. During the 30-day comment period on the EAW ending on April 30, 2026, the MPCA received comments from nineteen community members from April 5, 2026, to April 30, 2026. The MPCA received one comment letter from the Department of Natural Resources (DNR) on April 30, 2026.
10. On May 6, 2026, the MPCA requested and was granted approval from the EQB for a 15-day extension of the decision-making process on the need for an EIS for the Project in accordance with Minn. R. 4410.1700, subp. 2(B).
11. The list of comments received during the 30-day public comment period are included as Appendix A to these Findings. The MPCA prepared written responses to the comments received during the 30-day public comment period. These responses are included as Appendix B to these Findings.

The four criteria for determining the potential for significant environmental effects

12. The MPCA must base its decision on the need for an EIS on the information gathered during the EAW process and the comments received on the EAW (Minn. R. 4410.1700, subp. 3). The MPCA must order an EIS for projects that have potential for significant environmental effects (Minn. R. 4410.1700, subp. 1). In deciding whether a project has the potential for significant environmental effects, the MPCA must compare the impacts that may be reasonably expected to occur from the Project with the criteria set forth in Minn. R. 4410.1700, subp. 7. The four criteria are:
 - A. Type, extent, and reversibility of environmental effects.
 - B. Cumulative potential effects. The RGU shall consider the following factors:
 - 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 project.
 - C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority. The RGU 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.

- D. The extent to which the environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.

The MPCA Findings with respect to each of these criteria

A. Type, extent, and reversibility of environmental effects

13. The first criterion that the MPCA must consider when determining if a project has the potential for significant environmental effects is the “type, extent, and reversibility of environmental effects” (Minn. R. 4410.1700, subp. 7(A)). The MPCA Findings with respect to this criterion are set forth below.
14. The types of impacts that the MPCA anticipates may reasonably be expected to occur from the Project include the following:
- Water quality impacts related to surface water and groundwater;
 - Air quality; and
 - Wetlands.
15. With respect to the extent and reversibility of impacts that are reasonably expected to occur from the Project, the MPCA makes the following Findings.

Water quality relating to surface water and groundwater

16. The North Zumbro Sanitary Sewer District applied for an NPDES/SDS Permit. The Project would result in an increase to treat an AWWC of 4.1 MGD and discharge the wastewater to the North Fork of the Zumbro River. The MPCA is the permitting authority for the NPDES/SDS Permit.
17. The NPDES/SDS Permit would ensure the wastewater from the Facility can be discharged so the quality of surface waters, wetlands, and groundwater is protected.
18. The Facility would be on the outskirts of the City of Zumbrota, partially within the existing city limits and partially in Zumbrota Township.
19. The Facility would be an activated sludge facility with enhanced biological nutrient removal (EBNR) and aerobic digestion processes.
20. The Facility plans include an overflow retention basin, screening and grit removal, oxidation ditches, two final clarifiers, UV disinfection, aerobic digestion tanks, and biosolids storage tanks (primary, secondary, and tertiary treatment process units).
21. The Project will land apply biosolids to nearby agricultural fields.
22. Discharge from the Facility to the North Fork of the Zumbro River would replace the four existing WWTF discharge points to Mazeppa Creek (Goodhue), Zumbro River, Middle Fork (Pine Island), Shingle Creek–North Fork, Zumbro River (Wanamingo), and North Fork, Zumbro River (Zumbrota).
23. The Facility plans include an influent pump station, main process building housing return activated sludge (RAS), waste activated sludge (WAS), and sludge storage pumps, chemical feed, blowers, and main electrical, administration building, maintenance garage, storage building, and generator pad.
24. The proposed location of the forcemains is within the public right-of-way (ROW) and would be installed primarily by open trench methods, except at road or stream crossings, where horizontal directional drilling (HDD) would install the forcemains.

25. Installation of forcemains would involve temporary clearing of vegetation within the ROW, trench excavation, placement of pipe, backfilling, compaction, and restoration of disturbed areas.
26. Portions of the Goodhue and Pine Island forcemains pass through floodplains. These floodplains are in relation to Trout Brook that runs through the area of the Goodhue forcemain and Dry Run Creek that runs through the area of the Pine Island forcemain. No other special districts are present in the forcemain areas.
27. Pump stations in Goodhue, Pine Island, and Wanamingo would convey wastewater through forcemains to the Facility. The Project involves proposed construction of a new pump station for each community and constructing a new forcemain from each pump station to the new centralized Facility.
28. Construction activities for pump stations would include site grading, installation of underground wet wells and piping, placement of aboveground control structures, and connection to electrical and monitoring infrastructure.
29. The new pump station in Pine Island would be within the shoreland overlay district with fewer potential effects to the environment as wastewater would be within piping and not in ponds. The overlay district ensures that all uses comply with regulations of both the underlying zoning district and the shoreline overlay district, promoting sustainable development while preserving valuable shoreland resources. The other pump station locations are not within any special districts.
30. The North Fork of the Zumbro River would be the receiving waterbody for the wastewater effluent. Currently, this river has EPA-approved impairments for benthic macroinvertebrates bioassessments, *Escherichia coli* (*E. coli*), and turbidity, with confirmed biological stressors of physical habitat and suspended solids.
31. Impairments for the waters listed above are construction related parameters and require additional BMPs including stabilization of exposed soil areas initiated immediately and stabilized within seven days and temporary sediment basin provided for common drainage locations that serve an area with five acres or more disturbed.
32. Current water quality standards are based on designated uses for the waterbody. Designated uses set for the Zumbro River – North Fork include: 2Bg, 3, 4A, 4B, 5, and 6.
33. Pollutants of concern for the North Fork of the Zumbro River and downstream connections include 5-day Carbonaceous Biochemical Oxygen Demand (CBOD5), Total Suspended Solids (TSS), Ammonia, Nitrate, Chloride, Sulfate, Mercury and *E. coli*.
34. According to the antidegradation report completed for this Project, the Facility discharge effluent limits are not anticipated to result in violations of any water quality standards, except for sulfate. The projected future river concentrations are not anticipated to meet the Class 4A 10 mg/L water quality standard for sulfate. The existing ambient river concentrations are higher than the standard.
35. Each of the four member cities of NZSSD owns and operates its own drinking water wells and distribution system. Their drinking water comes from aquifers that are the primary source of sulfates in the wastewater streams. This is typical across the state of Minnesota and there are no viable alternative water supply sources with less sulfate. Sulfates are higher in drinking water than the Preliminary Effluent Limit (PEL). That is because drinking water is sourced from groundwater, and groundwater has sulfates.

36. The NZSSD PEL includes a 15.9 mg/L potential sulfate limit based on Class 4A 10 mg/L Water Quality Standard (WQS) because of potential wild rice production downstream on the Mississippi River. A Class 4B 600 mg/L WQS is also applicable to the receiving waters downstream of NZSSD.
37. Indirect effects of wastewater effluent such as increased scouring and sedimentation may result around the area of discharge. Increased sedimentation can degrade the surrounding water quality through turbidity, blocked sunlight resulting in reduced navigability, and habitat alternation for fish populations. If these effects are to occur, they will be minor and limited to the area of discharge.
38. The Facility would comply with regulations to protect “waters of the state” through the National Pollution Discharge Elimination System (NPDES/SDS) Wastewater Permit that includes effluent limits that would limit the impact to the discharge area. The SWPPP would identify best management practices (BMPs) for use during construction activities to limit the potential for erosion and sedimentation losses.
39. No trout streams, wildlife lakes, migratory waterfowl feeding/resting lakes, or outstanding resource value waters are within one mile of the Project Area.
40. Based on well logs, aquifers present along the forcemains include the Prairie Du Chien aquifer and the Jordan aquifer. The Goodhue and Wanamingo forcemains pass through Minnesota Department of Health (MDH) Wellhead Protection Areas as they enter city limits. No springs are in the location of the forcemains.
41. The Minnesota Hydrogeology Atlas estimates the depth to groundwater near the Goodhue and Pine Island pump stations at zero (0) to ten (10) feet (ft) and the Wanamingo pump station at ten (10) to 20 ft. The Goodhue pump station is within a MDH Wellhead Protection Area. No springs are in the anticipated locations of the pump stations.
42. The Minnesota Hydrogeology Atlas estimates the depth to groundwater around the Facility at zero (0) to ten (10) ft. No Wellhead Protection Area is present in the Facility location.
43. Due to the shallow groundwater table, it is likely that during construction, dewatering would occur. If required, the contractor would be responsible for obtaining a DNR Dewatering Permit.
44. Sources of wastewater for the Facility are primarily municipal but also include two significant industrial users. Land O’ Lakes is in Pine Island, MN and Dairy Farmers of America (DFA) is in Zumbrota, MN.
45. Once the new Facility is operational, new industrial users would be required to request capacity increases before the Joint Powers Board, which includes representatives from the communities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota.
46. Based on the anticipated effluent limits for the Facility and the need for nutrient removal, construction of an oxidation ditch treatment system utilizing EBNR technology would occur for nutrient removal (nitrogen and phosphorus). New discharge limits would ultimately result in less total phosphorus discharge to the North Fork of the Zumbro River than currently allowed in the permits for the existing Wanamingo and Zumbrota WWTFs.
47. WWTFs are receivers of Per- and polyfluoroalkyl substances (PFAS). They receive PFAS daily from a variety of industrial, commercial, and residential sources.

48. MDH has been sampling PFAS at community water systems (CWS) across Minnesota since 2021, and has, to date, sampled about 98% of those systems. The CWS nearest to the Project serves the city of Zumbrota.
49. Zumbrota CWS, uses groundwater as their primary drinking water source and has had no detections of PFAS greater than EPA's Maximum Contaminant Levels (MCLs) or MDH's Health Based Values (HBVs.)¹
50. The MPCA is currently developing an NPDES/SDS permitting strategy for PFAS, separate from the Class 1 PFAS WQS implementation strategy. The existing or reissued permit does not require monitoring but monitoring for one or more PFAS compounds may be applied in future reissuances.
51. MPCA's Minnesota Biosolids PFAS Strategy aims to guide biosolids land application decisions and allow farmers and landowners to make informed decisions related to the land application of biosolids. Data collected through the Strategy would inform future actions pertaining to biosolids and PFAS. The biosolids from this Project would be land applied to agricultural fields.
52. The city of Zumbrota will obtain an NPDES/SDS General Construction Stormwater Permit for the Project administered by the MPCA. NZSSD would develop a Stormwater Pollution Prevention Plan (SWPPP) consistent with NPDES requirements.
53. The SWPPP would identify best management practices (BMPs) for use during construction activities to limit the potential for erosion and sedimentation losses. These practices include the installation of silt fences, erosion control mats, bale checks, and minimizing interference with existing drainage routes.
54. The Facility in Zumbrota is primarily in an agricultural field. NZSSD anticipates the Project will reduce runoff on the Facility site due to construction of a stormwater retention pond.
55. Permanent stormwater management includes a wet sedimentation pond. Conversion of existing agricultural land to a permanent lawn/grassland/brush groundcover will occur. The MPCA administers the NPDES program for stormwater control in construction, and addresses pollution runoff from stormwater as mandated by the Clean Water Act. Following construction, the agriculture field would be redesignated as the site for the Facility.
56. Temporary dewatering may be necessary for the installation and connection of forcemains to the Facility. If the volume of water pumped exceeds 10,000 gallons per day or 1,000,000 gallons per year, the city of Zumbrota would apply for a Department of Natural Resources (DNR) Water Appropriation Permit. If volumes are smaller, the City of Zumbrota would apply for coverage under the DNR General Permit for Temporary Appropriations when the Project meets eligibility criteria (≤ 50 million gallons and < 1 year duration).
57. The DNR Water Appropriation Permit ensures management of water resources so that adequate supply is available for long-range seasonal requirements for domestic, agricultural, fish and wildlife, recreational, power, and navigational.
58. The MPCA finds that information presented in the EAW and other information in the environmental review record are adequate to assess potential impacts of water quality relating to groundwater and surface water that are reasonably expected to occur from the Project.

59. The MPCA finds the Project, as proposed, does not have the potential for significant environmental effects based on the type, extent and reversibility of impacts related to water quality, which are reasonably expected to occur.

Air quality

60. NZSSD submitted an air dispersion modeling protocol to MPCA for review.
61. Point sources at the facility include the odor control unit. Volume sources were used to represent natural gas heaters and the oxidation ditch. The heater sources are centered around the administrative building, the digestion and solids handling building, the preliminary treatment building, the tertiary treatment building, the flow retention pump building, and the Return Activated Sludge and Waste Activated Sludge (RAW/WAS) pump station.
62. Following MPCA modeling and AERA guidance, the emergency generator engine was excluded from the criteria pollutant modeling and the quantitative risk estimate.
63. The model determined that modeled facility impacts for PM₁₀, PM_{2.5}, SO₂, and CO were below the Significant Impact Level (SIL). NO₂ facility impacts were above the SIL and below the National Ambient Air Quality Standards (NAAQS) with background concentrations included.
64. Facility impacts for H₂S were below the Minnesota Ambient Air Quality Standards (MAAQS). Uncontrolled H₂S emissions were evaluated for the MAAQS. Therefore, actual concentrations are expected to be approximately 100 times lower than the modeled H₂S concentrations.
65. The MPCA completed review of the air dispersion modeling protocol and issued an Air Quality Dispersion Modeling Protocol Approval Notification Form (AQDM-04) confirming that the proposed air dispersion modeling approach is acceptable. MPCA approved the protocol on March 6, 2026.
66. An Air Emissions Risk Analysis (AERA) was conducted to determine the impact of the Project's air toxics and hazardous air pollutant emissions.
67. An air toxics assessment was performed for the air emissions emitted from the proposed odor control unit, biological phosphorus removal, and natural gas makeup-air units and heaters. The AERMOD modeling results were entered in MPCA's Risk Assessment Spreadsheet (RASS) to calculate the health risks and hazards from the Facility's air emissions.
68. All facility hazards and risks are less than or equal to the threshold value of 1. The results in the AERA show that the health risks and hazards for the Facility meet the thresholds set by the MDH. The AERA was performed in accordance with the air dispersion modeling protocol reviewed and approved by the MPCA.
69. The Project would not pose significant excess lifetime cancer risks to the public because the calculated risk levels, including background monitoring data, meet the threshold of 1E-05. 6.4% of the cumulative sum inhalation cancer risk is anticipated to be caused by the Project.
70. The Project would also not pose any sub-chronic or chronic multi-pathway health hazards to the public because the calculated hazard indices meet the threshold of 1 with 38% of the total cumulative impacts attributed to the Project.

71. The acute inhalation health hazard index for the Project alone meets the threshold value of 1. Background monitoring data exceeds the acute inhalation health hazard threshold of 1. Project impacts are anticipated to account for 40% of total cumulative impacts with background concentrations.
72. Acute inhalation health hazards provided in the AERA are a conservative overestimation of health impacts from the Project. Methanol is not expected to evaporate but is used as a carbon source during wastewater treatment. The potential emission calculations assume all methanol used is emitted, which overestimates the actual expected emissions, even during maximum operating conditions. This overestimates the acute and chronic inhalation hazards.
73. The acute inhalation hazard index is driven by hydrogen sulfide from the odor control for screening and grit removal processes. The potential emission estimates use high-end assumptions and overestimate emissions.
74. The odor control systems are designed to remove 99% of hydrogen sulfide emissions and are not accounted for in the calculations.
75. The values represented in the RASS and AERA overestimate hydrogen sulfide emissions by 100 times. Further, the RASS assumes there is a receptor at the location of the high-first-high concentration, and they are in that location during the worst-case meteorological conditions for dispersion, both of which are unlikely in the Project Area.
76. The MPCA finds that information presented in the EAW and other information in the environmental review record are adequate to assess potential impacts of air quality that are reasonably expected to occur from the Project.
77. The MPCA finds the Project, as proposed, does not have the potential for significant environmental effects based on the type, extent and reversibility of impacts related to air quality, which are reasonably expected to occur.

Wetlands

78. A wetland delineation completed for the entire Project Area (the proposed Facility, pump station locations at/near the existing community WWTFs, and the approximately 24-mile conveyance corridor within public ROW along highways and local roads), identified twenty natural wetlands, forty-seven wetlands in ditches constructed through uplands (wet ditches), and twenty-three waterways in the Project Area.
79. Thirteen wetlands, forty-nine wet ditches constructed through uplands, and sixteen waterways are associated with the forcemains of Goodhue, Wanamingo, and Pine Island. Eight of these waterways are public waters.
80. The DNR Public Waters Inventory identifies these as seven unnamed creeks. An unnamed creek, also known as Stream 22 from the Wetland Delineation Report, is near the City of Wanamingo and has a U.S. Environmental Protection Agency (EPA)-approved impairment for benthic macroinvertebrates bioassessments. Shingle Creek is 0.25 miles outside of the Wanamingo forcemain and has an EPA-approved impairment for benthic macroinvertebrates bioassessments.
81. The forcemains that would run from the pump stations in Pine Island, Wanamingo, and Goodhue to the Facility site in Zumbrota are primarily within maintained ROW. During construction, ground disturbance would occur due to Horizontal Directional Drilling (HDD)

- and open cut trenching. Implementation of a SWPPP would limit erosion and sedimentation issues from construction.
82. Best management practices (BMPs) would include installing silt fences, bio-logs, mulch, and hydroseeding to minimize impacts to streams and wetlands adjacent to the Project Area. Upon conclusion of construction activities, stormwater runoff is anticipated to be of a quantity and quality consistent with roadside ditches.
 83. Wetland delineation is not required for the proposed pump station locations in Wanamingo, Pine Island, and Goodhue because all disturbance would occur within areas previously developed.
 84. NZSSD anticipates locating the pump stations on the same site(s) as the four existing WWTFs. During pump station construction, a SWPPP would minimize impacts to nearby streams and wetlands through erosion and sedimentation controls such as silt fences, bio-logs, mulch, and hydroseeding.
 85. Demolition of the existing WWTFs is not within the scope of the Project, but anticipated to occur in 2028, during which time a SWPPP would also be implemented for erosion and sedimentation controls.
 86. Five wetlands and seven waterways from the wetland delineation are associated with the Project Area. One of the waterways is a public water, North Fork of the Zumbro River.
 87. The MPCA finds that information presented in the EAW and other information in the environmental review record are adequate to assess potential wetlands impacts that are reasonably expected to occur to and from the Project.
 88. The MPCA finds the Project, as proposed, does not have the potential for significant environmental effects based on the type, extent and reversibility of impacts related to wetlands, which are reasonably expected to occur.

B. Cumulative potential effects

89. The second criterion that the MPCA must consider when determining if a project has the potential for significant environmental effects is the “cumulative potential effects.” In making this determination, the MPCA must consider “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 effects; and the efforts of the proposer to minimize the contributions from the project.” Minn. R. 4410.1700 subp.7(B). The MPCA findings with respect to this criterion are set forth below.
90. The EAW, public comments, and MPCA follow-up evaluation did not disclose any related or anticipated future projects that may interact with this Project in such a way as to result in significant cumulative potential environmental effects.

Cumulative effects – summary

91. The Project is in response to the cities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota facing similar issues with deterioration of facilities, which are nearing the end of their life cycles, and have elected to form a joint sanitary district, the NZSSD, to provide wastewater treatment for the four communities via a new centralized Facility. The Project is designed to meet the wastewater needs of the four cities through the year 2045.

92. The cumulative potential effects considered are those associated with the construction and operation of the proposed Facility, pump stations, and forcemains. During construction, potential effects include temporary noise, dust, emissions from equipment and commuting, localized traffic increases, temporary dewatering, and short-term disturbance of wetlands, streams, or roadside ditches crossed by the forcemains.
93. NZSSD expects these impacts to be limited in geographic extent and durations and subject to BMPs under required permits such as an MPCA NPDES Construction Stormwater Permit.
94. During operation, the primary cumulative effect is the consolidation of treated effluent discharges to a single permitted outfall at the North Fork of the Zumbro River, replacing four existing discharge locations.
95. Biosolids application to nearby agricultural land would continue under Minnesota regulations (Minn. R. 7041). Peak hauling operations are anticipated to generate approximately 17 truckloads per day (8,000-gallon tanker semis) over roughly 22 days during both the spring and fall seasons. All waste hauling will be managed by waste haulers licensed through the MPCA. Based on information on the Project obtained from presented in the EAW, and consideration of potential effects due to related or expected future projects, the MPCA does not expect significant cumulative effects from this Project.
96. The MPCA finds the Project, as proposed, does not have the potential for significant environmental effects related to cumulative potential effects that are reasonably expected to occur.

C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority

97. The third criterion that the MPCA must consider when determining if a project has the potential for significant environmental effects is "the extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority. The RGU 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." Minn. R. 4410.1700, subp. 7(C). The MPCA findings with respect to this criterion are set forth below.

98. The following permits or approvals will be required for the Project:

Unit of Government	Permit or approval required
Minnesota Pollution Control Agency (MPCA)	National Pollutant Discharge Elimination System and State Disposal System (NPDES/SDS) Construction Stormwater Permit MNR100001
	NPDES/SDS Industrial Stormwater General Permit MNR 050000
	Sanitary Sewer Extension Permit (Will be submitted)
	National Pollutant Discharge Elimination System and State Disposal System (NPDES/SDS) Individual Wastewater Permit
	Effluent Limits and Antidegradation Report Review (Review complete)
	Section 401 Water Quality Certification (To be determined; if USACE Section 404 permit is required, MPCA Section 401 Water Quality Certification would also be required)
U.S. Army Corps of Engineers (USACE)	Section 404 Standard Individual Permit (To be determined)
Minnesota Board of Water and Soil Resources (BWSR)	Wetland Conservation Act (WCA) Notice of Decision (NOD)
Minnesota Department of Natural Resources (MDNR)	Water Appropriation Permit and Construction Dewatering (Will be submitted if needed)
Minnesota Department of Transportation (MN DOT)	Utility Accommodation for Trunk Highway ROW Permit (Will be submitted)
City of Zumbrota	Conditional Use Permit (Will be submitted)

Below are numbered paragraphs describing each permit listed above, including special conditions.

99. **Construction Stormwater Permit.** A NPDES/SDS Construction Stormwater Permit (CSW permit) is required when a project disturbs one acre or more of soil. The CSW permit requires the use of best management practices to prevent erosion and to keep eroded sediment from leaving the construction site and requires projects that create one acre or more of new impervious surface to provide permanent treatment of stormwater runoff. The project proposer must have a SWPPP that provides details of the specific measures to be implemented.

100. **Industrial Stormwater Permit.** A NPDES/SDS Industrial Stormwater General Permit is required to identify conditions under which industrial stormwater can be discharged so that the quality of surface waters, wetlands and groundwater is protected. The permit requires a stormwater pollution prevention plan (SWPPP) that provides details of best management practices to be implemented.

101. **Sanitary Sewer Extension Permit.** A Sanitary Sewer Extension Permit is required when constructing new sewers, building sewer mains, trunks, interceptors, or other projects intended for future expansions of service, replacing existing sewers with larger sewers, and installing additional or larger pumps to increase capacity. Extensions of a sewer system are considered a facility expansion, and MPCA permits may be required for extensions, additions, or other modifications that result in new or increased discharges of pollutants.

102. **NPDES/SDS Wastewater Permit.** A NPDES/SDS Wastewater Permit is required if construction groundwater dewatering discharge is contaminated and not routed through the plant but directly discharged. The purpose of the permit is to identify conditions under which industrial stormwater can be discharged so that the quality of surface waters,

wetlands, and groundwater is protected. The permit requires a SWPPP that provides details of best management practices to be implemented.

103. **Effluent Limits and Antidegradation Review.** An Effluent Limits and Antidegradation Review is required when a permit application is made for a regulated activity that is anticipated to result in a net increase in loading or other causes of degradation waters of the state. Antidegradation rules exist to protect, maintain and achieve high quality surface water by protecting the existing uses and water quality. Antidegradation requirements are implemented through the issuance and enforcement of NPDES permits and other control documents issued by the MPCA which regulate surface water pollution.
104. **Section 401 Quality Certification.** Section 401 of the Clean Water Act is designed to ensure that the federal government does not issue a permit or license for a project that will result in a violation of the state water quality standards set under the Clean Water Act in Waters of the United States (WOTUS). Minnesota's state water quality standards set conditions that must exist in order to protect drinking water, a healthy aquatic community, and recreational uses. When a project that will impact WOTUS in Minnesota requires a federal Section 404 permit, the MPCA reviews the project under Section 401 to ensure that it will not violate the more restrictive water quality standards that the MPCA has established for that body of water.
105. **Section 404 Standard Individual Permit.** The USACE general permit provides language describing procedures and permissions regarding excavation in wetlands and placement of excavated materials into the waters of the United States or their associated wetlands.
106. **Wetland Conservation Act Notice of Decision.** A Minnesota Wetland Conservation Act (WCA) Notice of Decision (NOD) is a formal document issued by a Local Government Unit (LGU) detailing the approval, denial, or exemption of a proposed wetland impact. It must be sent to all recipients of the Notice of Application and is appealable within 30 days.
107. **Water Appropriation Permit.** The Water Appropriation Permit is required for all users withdrawing more than 10,000 gallons of water per day or one million gallons per year. The purpose of the permit program is to ensure water resources are managed so that adequate supply is provided to long-range seasonal requirements for domestic, agricultural, fish and wildlife, recreational, power, navigational, and quality control. The DNR administers this permit and requires monthly usage monitoring and annual reporting to ensure that surrounding communities' and industries' water supplies will not be affected by draw-down of the aquifer. Minn. Stat. § 103G.261 establishes domestic water use as the highest priority of the state's water when supplies are limited.
108. **Utility Accommodation for Trunk Highway ROW Permit.** The Right of Way Permit ensures that the work will be accomplished in a manner that will not be detrimental to the Right of Way and that will safeguard the public, and that the right of way on trunk highways is restored to its original condition
109. **Conditional Use Permit.** The proposer is required to obtain all required building and conditional use permits required by local units of government to ensure compliance with local ordinances. The conditional use permit will address local zoning, environmental, regulatory, and other requirements that are needed to avoid adverse effects on adjacent land uses.
110. The above-listed permits include general and specific requirements for mitigation of environmental effects of the Project. The MPCA finds that the environmental effects of the

Project are subject to mitigation, as explained in these Findings and the EAW, by ongoing public regulatory authority.

D. 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, including other EISs

111. The fourth criterion that the MPCA must consider is “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, including other EISs,” Minn. R. 4410.1700, subp. 7(D). The MPCA Findings with respect to this criterion are set forth below.

112. Although not exhaustive, the MPCA reviewed the following documents as part of the environmental impact analysis for the proposed Project:

- Data presented in the EAW.
- Permits and environmental review of similar projects.

113. The MPCA also relies on information provided by the cities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota, people commenting on the EAW, staff experience, and other available information obtained by staff.

114. The environmental effects of the Project have been addressed by the design and permit development processes, and by ensuring conformance with regional and local plans. No elements of the Project pose the potential for significant environmental effects that are not addressed or mitigated by the requirements of the permits listed above or in the EAW.

115. Based on the environmental review, previous environmental studies by public agencies or the project proposer, and staff expertise and experience on similar projects, the MPCA finds that the environmental effects of the Project that are reasonably expected to occur can be anticipated and controlled.

116. The MPCA adopts the rationale stated in the attached Response to Comments (Appendix A) as the basis for response to any issues not specifically addressed in these Findings.

CONCLUSIONS OF LAW

117. The MPCA has jurisdiction in determining the need for an EIS for this Project. The EAW, the permit development process, and the evidence in the record are adequate to support a reasoned decision regarding the potential significant environmental effects that are reasonably expected to occur from this Project.
118. The MPCA identified areas for potential significant environmental effects. The Project design and permits ensure the cities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota will take appropriate mitigation measures to address significant effects. The MPCA expects the Project to comply with all environmental rules, regulations, and standards.
119. Based on a comparison of the impacts that are reasonably expected to occur from the Project with the criteria established in Minn. R. 4410.1700 subp. 7, the Project does not have the potential for significant environmental effects.
120. An EIS is not required for the proposed North Zumbro Sanitary Sewer District (NZSSD) Project.
121. Any Findings that might properly be termed conclusions and any conclusions that might properly be termed Findings are hereby adopted as such.

ORDER

The Minnesota Pollution Control Agency determines that there are no potential significant environmental effects reasonably expected to occur from the Zimmerman Wastewater Treatment Facility and that there is no need for an Environmental Impact Statement.

IT IS SO ORDERED

June 3, 2026

Date signed

Katrina Kessler

This document has been electronically signed.

Katrina Kessler, P. E.
Commissioner
Minnesota Pollution Control Agency

Appendix A

Minnesota Pollution Control Agency

North Zumbro Sanitary Sewer District (NZSSD)

LIST OF COMMENT LETTERS RECEIVED

1. Comments by Alice Bygd. Letter received April 5, 2026.
2. Comments by Aubree Derksen. 20 letters were received April 15-29, 2026.
3. Comments by Rodney Lanners. Letter received April 15, 2026.
4. Comments by Nicole Mills. Letter received April 16, 2026.
5. Comments by Jason Huso. Letter received April 24, 2026.
6. Comments by Janet Hanke. Letter received April 28, 2026.
7. Comments by Janice Hobbs. Letter received April 29, 2026.
8. Comments by Kahla Jourdan. Letter received April 29, 2026.
9. Comments by Kami Johnson. Letter received April 29, 2026.
10. Comments by David Wilson. Letter received April 29, 2026.
11. Comments by Peter Reuss. Letter received April 29, 2026.
12. Comments by David Derksen. Letter received April 29, 2026.
13. Comments by Amanda Nygaard. Letter received April 29, 2026.
14. Comments by Darcie Simpson. Letter received April 29, 2026.
15. Comments by Melissa Collins, DNR. Letter received April 30, 2026.
16. Comments by Erica Kettner. Letter received April 29, 2026.
17. Comments by Roxann Voigt. Letter received April 29, 2026.
18. Comments by Mary Bakeberg. Letter received April 29, 2026.
19. Comments by Kelly Leibold. Letter received April 29, 2026.
20. Comments by Melissa Henry. Letter received April 29, 2026.

Appendix B
Minnesota Pollution Control Agency

North Zumbro Sanitary Sewer District (NZSSD)
Environmental Assessment Worksheet (EAW)
Comments

Responses to comments on the EAW

1. Comments by Alice Bygd. Letter received April 5, 2026.

Comment 1-1: I think that Zumbrota should stay separate especially from Pine Island that will soon have a data center.

Response 1-1: Comment noted.

2. Comments by Aubree Derksen. 20 letters were received April 15-29, 2026.

Comment 2-1: One of the important components necessary to building a new wastewater facility is knowing what's going to be connecting to it, how to assess potential risks and mitigate those risks. A key detail was left out: Pine Island's data center Project Skyway. This is a worrisome missing detail given the city is facing a lawsuit by the Minnesota Center for Environmental Advocacy over the inadequacy of the environmental review of the "Project Skyway." See court case file 25-CV-25-2298.

Response 2-1: The communities comprising the North Zumbro Sanitary Sewer District (NZSSD) developed Facilities Plans that included projected wastewater flows for the 2045 design year of the wastewater treatment facility (WWTF). These design flow estimates accounted for anticipated population growth, as well as expected industrial and commercial development and expansion within each community. Projected wastewater flows for anticipated industrial and commercial development including Project Skyway were included in Pine Island's design flow estimates.

Sources of wastewater to be treated are primarily municipal with some industrial users, which have been taken into consideration when developing WWTF design and flow standards. Industrial contributors will be responsible for managing their own wastewater regulation needs with their own permits and will rectify any potential wastewater regulation misconduct.

Any new industrial users of the WWTF would be required to request capacity increases before the Joint Powers Board, which includes representatives from the communities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota. Any future potential industrial operation that may result in requests for design flow capacity change to the WWTF area is beyond the scope of this EAW.

Comment 2-2: On p.28 of the AUAR the required prompt of the environmental review towards the top of the page is "Wastewater - For each of the following, describe the source, quantities, and composition of all sanitary, municipal/domestic and industrial wastewater produced or treated at the site." Towards the bottom of the page, highlighted you'll see "Industrial process wastewater is not anticipated." That's all the analysis given. On p.29 they only list the standard process that the wastewater treatment facility *uses*. There is no mention of any chemicals produced by Project Skyway, how they would be disposed of or whether the wwtf could dispose of

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them, what harms could be caused by any chemicals or how any potential harms could be mitigated, which is the entire purpose of this section of the environment review.

Response 2-2: The proposed new WWTP's discharge effluent limitations are set to ensure that the Facility's discharge doesn't cause or contribute to an exceedance of state water quality standards in the receiving water. Additionally, the new WWTF would be required to conduct annual whole effluent toxicity (WET) testing, which is designed to identify any combined toxic effect of all chemicals in treated wastewater, and priority pollutant testing, which is used to measure specific, highly toxic chemicals (such as heavy metals, pesticides, and volatile organics). It is also worth noting that the draft NPDES/SDS permit requires the permittee to regulate the discharge from users of its publicly owned treatment works (POTW) in order to prevent any pass through of pollutants or any inhibition or disruption of the permittees POTW, its treatment processes, or its sludge processes or disposal that contribute to the violation of the draft permit or any federal or state law or regulation limiting the release of pollutants from the POTW.

The Mississippi River is considered a "waters of the state," and is protected by state laws and regulations. General requirements for discharges per Minn. R. 7053.0205, include minimum stream flow and water quality standards. "Discharges of sewage, industrial waste, or other wastes must be controlled so the water quality standards are maintained at all stream flows that are equal to or greater than the 7Q10 for the critical month or months. In addition, the new WWTF would comply with regulations to protect "waters of the state" through the National Pollution Discharge Elimination System (NPDES/SDS) Wastewater Permit. Please also see response to comment 2.1.

Comment 2-3: On p.27 of the AUAR it says "both scenario A and B would utilize an air-cooling system...therefore additional groundwater impacts are not anticipated." The Preliminary Development Plan (PUD) specifically mentions (in addition to other sources) "no water usage will be used for data center cooling." Now comes the January 13th, 2026 zoning meeting. In the notes of this meeting that was not live streamed the city administrator, Elizabeth Howard says a "closed loop air cooled system consists of tubes that are filled with water,"---that right there is water that is being used for cooling purposes, which is a direct contradiction to the PUD's claims of no water for cooling purposes. You still need to disclose how much *groundwater* is going into those tubes and your environmental review should have included that water usage into its totals for groundwater impact analysis. If there's a leak in those tubes that's the type of harmful situation you're supposed to mention on p.28 of the AUAR and provide a mitigation strategy for it.

Response 2-3: Temporary dewatering may be necessary for the installation and connection of forcemains to the new WWTF. If the volume of water pumped exceeds 10,000 gallons per day or 1,000,000 gallons per year, the City of Zumbrota would apply for a DNR Water Appropriation Permit in accordance with Minnesota Statute 103G.271. If volumes are smaller, the City of Zumbrota would apply for coverage under the DNR General Permit for Temporary Appropriations when the Project meets eligibility criteria (≤ 50 million gallons and < 1 year duration).

Potential environmental effects from dewatering could include temporary drawdown of groundwater levels, minor interference with nearby wells or wetlands, and increased turbidity or sediment in surface water receiving discharge. Limited effects would occur since dewatering would be short-term and construction related, and mitigation measures such as use of settling basins, filtration, and controlled discharge locations are expected to be implemented in accordance with MPCA Dewatering and Basin Draining Guidance¹. The regional water supply is likely considered adequate to support temporary dewatering needs, but the Project would remain subject to DNR review to confirm availability and sustainability at the time of permit issuance. Please also see response to comment 2-1.

Comment 2-4: Craig Britton, city engineer then says the chemical disposal of this closed loop system would be “flushed into holding tanks and disposed of offsite, the city may be able to take some waste into the local system. Britton stated that the Environmental Impact Analysis was completed in September of 2025.” Now we have the city stating that in this undisclosed amount of water there is an undisclosed amount of undisclosed chemicals, but when you look up what chemicals are typically in closed loop systems (glycol, PFAS, corrosion inhibitors, fire suppression agents, HFOs, HFCs, biocides) municipal water treatment facilities can’t remove those chemicals. But apparently Pine Island may be going to take some of that waste into their system, which discharges into the Zumbro River. MPCA’s own staff have confirmed in phone calls with me that this is industrial wastewater. This wastewater is planned to be produced *and* potentially treated without having undergone any environmental review not only at Pine Island’s existing wwtf if the data center is built before this new site is, but then they would just move on over to this new wwtf doing the same thing they did in Pine Island site. It is also unacceptable to just simply state that this effluent discharge of unknown quantity is going into holding tanks and being disposed of offsite. To where? How big are these tanks? What if they leak? What’s in them? If what’s inside of those holding tanks is so hazardous you have to dispose of it off site what is your hazardous waste mitigation plan and why did you never once mention that during environmental review? The environmental review the city engineer is referencing as supposedly addressing this is the very same AUAR where they stated there wouldn’t be any industrial wastewater.

Response 2-4: The North Zumbro Sanitary Sewer District has applied for a NPDES/SDS permit which regulates the effluent limits into a surface water. Once operational, the NZSSD wastewater treatment facility will be required to report on discharge monitoring results to ensure compliance with the permits effluent limits. Please also see response to comment 2-1.

Comment 2-5: Per the lawsuit (indexes 4,12, 56, 65, 70) there is also evidence that the project’s water usage is 2-3x higher than what was reported in the AUAR, which will also have a significant impact in being able to accurately assess wastewater treatment facility design and impacts. Data centers have to clearly state what they are using for their cooling systems and have very well defined plans in place in order to have effective wastewater management. The chemicals used in their cooling systems impact the physical structure, the pipes and the cooling systems they use impact the electrical wiring needed etc. It also has significant impacts on the environment. You will need to know the Water Usage Effectiveness and the Power Usage Effectiveness (<https://www.eesi.org/articles/view/data-centers-and-water-consumption>) and climate has an impact on whether air cooling will actually work as well. Given all of MPCA’s information in the EAW highlight MN’s climate is warming, air cooling is least effective in warmer climates, there also needs to be very clearly defined guidelines as to the limits of what types of cooling systems this new wwtf would even support for data centers as far as capacity for intake, ability to remove chemicals and payment for equipment upgrades if the data center lies. (<https://ecologixsystems.com/articles/data-center-water-treatment-systems-in-theory-and-in-practice>) Pine Island is making this a violation of the NPDES permit waiting to happen.

Response 2-5: To address changing climate conditions, measures such as recycling or reusing pumped water on-site for dust control or construction needs, limiting the extent of open excavations, and sequencing work to reduce peak drawdown can help minimize demand and environmental effects. If water supply constraints occur or demand exceeds permitted volumes, contingency measures may include adjusting construction sequencing, connecting to an alternate approved source, or establishing temporary emergency connections allowed under permit conditions. Please also see response to comment 2-1.

Comment 2-6: I have concerns that the feasibility study is not up-to date. For one, it was done in 2021 and five years has passed. That seems like a significant period of time to wait before beginning construction. I'm also noticing that in this feasibility study the data collected for Goodhue is based off of the 2010 census. The 2020 census is

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what should be used and this merits an update so that there's accurate information being collected. The markets have changed as well. The Trump administration alone has caused significant upheaval in the last year alone. I can all but guarantee there's going to be financial implications to this project based on impacts from the current administration alone. Inflation has gone up 21.86% since 2021 (<https://www.in2013dollars.com/us/inflation/2021>). Things are far more expensive now and it's recommended to do new feasibility studies when there's been significant market shifts (<https://luthresearch.com/glossary/when-to-conduct-a-feasibility-assessment/>).

Response 2-6: A feasibility study was conducted to evaluate existing conditions, proposed improvements, costs, and provide recommendations. Each of the cities of Goodhue, Pine Island, Wanamingo, and Zumbrota are facing similar issues with deterioration of facilities, which are nearing the end of their life cycles. Further deterioration of the current facilities could limit growth and development opportunities for the communities. The majority of the local 2020 census data was released in the late summer of 2021. The feasibility study was started prior to the 2020 data being released. In addition, the anticipated inflation for the 2027 construction year was incorporated into the construction cost estimate for this Project.

Comment 2-7: P. 18 states "Analysis of flow retention costs indicated that it would cost approximately \$1 per gallon of volume to construct flow retention infrastructure at each individual community while it would cost approximately \$0.80 per gallon of volume to construct centralized flow retention infrastructure." Considering that Pine Island is in a lawsuit involving the data center "Project Skyway" (25-CV-25-2298) and the water usage estimates are alleged to be 2-3x more than what the data center said it would be in the AUAR (see indexes 4,12, 56, 65,70) this is a very big cost implication for Pine Island residents. It's also an even bigger implication considering that the data center is only in phase 1, phase 2 hasn't come down the pipeline yet and the EAW scoping for 3 more data center buildings were just announced going onto the phase 1 plot of land (index 63) bringing this to 4 data centers on the 1 plot of land and these 3 data centers will have water usage as well and cooling technology that's going to impact this new WWTF. The WWTF also was based off a 4MGD water permit that also wasn't taking into account Pine Island's data centers. Pine Island's data center venture is throwing too many big changes into the mix that need to be accounted for.

Response 2-7: Please see response to comment 2-1.

Comment 2-8: Update the feasibility study including all of Pine Island's data centers and press Pine Island hard for exact details that won't require a lawsuit to find the information out. Or remove Pine Island from the project and make them deal with the data centers and updating their wastewater facility on their own without penalizing the other communities. Removing Pine Island from the equation would free up funding for the other communities who are not overly complicating the project.

Response 2-8: Each of the cities are facing similar issues with deterioration of facilities, which are nearing the end of their life cycles and facing more restrictive permit discharge limits. The issues include outdated facilities in each community, high operation and maintenance costs, lack of space to expand existing facilities, multiple points of discharge into the Zumbro River, limited potential to accommodate growth in the communities, and facilities within a floodplain. Please also see response to comment 2-1.

Comment 2-9: I was out in public just being a normal person at a completely unrelated social event engaging in small talk with the people there and in response to the normal question of "so what do you do for work?" I learn I'm talking with one the primary civil engineers for this project. I do follow up questions as is my right and duty as an impacted resident of this project and I learn they had no idea about the data center project in general, no idea it was in a lawsuit, no idea there would be 9 of them and water usage of data centers hasn't been factored in to the design. Companies that design these projects are required to do it competently because there are real

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people like me that depend on it being done right and there are real eco-systems and environments, like the one I live in that depend on it being done right. But they can't do it right when critical information is left out. And trust in the MPCA, the city, the engineering company is all impacted when a resident like myself can quite literally strike up a random conversation with a random person and find out that critical information necessary to ensure our watershed isn't being contaminated wasn't included in the wastewater treatment facility project that's responsible to ensure that doesn't happen. You need to go back to the drawing board with the project with all the critical details of 9 data centers, all energy usage, all water usage, all chemicals, included. This is public record, you have been warned. If you don't you will be held liable for all damage and negative outcomes that would have been prevented had you done your due diligence.

Response 2-9: Please see response to comment 2-1.

Comment 2-10: How will this new system address PFAS? Can it remove PFAS? I know it's an option but I don't know if Pine Island or any of the other cities applied for PFAS clean water specific grant funding for this project. Data centers and other large projects could jeopardize that funding. <https://www.eesi.org/articles/view/data-centers-are-contributing-to-pfas-forever-chemical-pollution>.

Response 2-10: PFAS pollution is present in municipal WWTF influent at varying levels depending on the contributions from industrial, commercial, and household sources. As such, municipal WWTFs are conduits of PFAS. PFAS loads coming into the plant are not removed (treated) prior to discharge, but the processes involved in treating wastewater for other contaminants do not generate or contribute additional PFAS to the environment. The community water systems (CWS) nearest to the Project serves the City of Zumbrota, which uses groundwater as their primary drinking water source, has had no detections of PFAS greater than either EPA's Maximum Contaminant Levels (MCLs) or MDH's Health Based Values (HBVs).

EPA's MCLs for PFAS are incorporated by reference as Class 1 water quality standards (WQS) in Minn. R. 7050.0221. As described, this Project would discharge to the North Fork of the Zumbro River. There are no Class 1 surface waters downstream of the Crow River, North Fork from where it passes near Zumbrota. Please also see response to comment 2-1.

Comment 2-11: The MPCA as well as all cities in the NZSD and the engineering firm need to pay close attention to the fact that the DNR told Pine Island 1 year ago they'd need a new water treatment facility for the data center. There's now a lawsuit because aquifer and groundwater impacts among other things were not evaluated when they should have been. PI and Ryan Co/Google have also been planning on using the new WWTF for a long time, they even moved a water tower specifically because a data center wanted it for their own water pressure needs, but the new WWTF doesn't appear to have been in the loop on that fact. I also wonder how the business subsidy between PI and Ryan Co/Google factors in to the financial agreements of the NZSD signed by the other parties?

Response 2-11: Please see response to comment 2-1.

Comment 2-12: It is a good thing that this new facility is proposed on a location that is not within a floodplain. <https://www.americanrivers.org/wpcontent/uploads/2025/04/MississippiRiverMER2025.pdf>

Response 2-12: Comment noted. Per the EAW, the new WWTF site in Zumbrota is outside of the Federal Emergency Management Agency (FEMA) floodplain map.

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Comment 2-13: Unless I am mistaken, I worry that there is yet still no requirement that requires the MPCA to notify well owners about projects that would impact their wells, like dewatering, even if effects may only be temporary. The onus is placed entirely on a private individual to notify the MN Duty Officer after the fact. This is backwards and irresponsible. Fixing a private well because a contractor or state agency made a mistake can cost thousands of dollars. This project is going up in a rural community, we are in a significant childcare shortage area and some of your identified wells may be in-home childcares or other businesses and our already resource stressed communities cannot take additional hits, especially now when everything costs so much more. People need a heads up.

Response 2-13: Due to the shallow groundwater table, it is likely that during construction dewatering would occur. If required, the City of Zumbrota would be responsible for obtaining a DNR Water Appropriation Permit. The DNR Water Appropriation Permit limits are designed to protect water resources. The Project is not anticipated to impact groundwater or groundwater dependent features such as nearby wetlands and private wells.

Water from dewatering during construction will also be managed with the MPCA Construction Stormwater Permit (CSP). Minnesota's CSP is an extension of the National Pollutant Discharge Elimination System (NPDES) Stormwater Program, which is part of the Federal Clean Water Act.

The MPCA protects private wells during construction through mandated stormwater permits, which require erosion control, sediment management, and pollution prevention plans. A Stormwater Pollution Prevention Plan (SWPPP) for construction activities will also be developed and implemented to control sediment and other pollutant discharges from the site. Dewatering is not anticipated to be required following completion of construction.

Comment 2-14: I request that the MPCA as the RGU of the project individually notify every well owner about this project that would be potentially impacted by dewatering or any other construction. On page 30 that's 32 wells within 500 feet of the forcemains. Though it seems pertinent that the MPCA extend their impact analysis to 1000ft given that dewatering effects travel farther in highly permeable soils such as sand and each of the forcemain areas appear to contain high amounts of sand, and if the range is increased the number of wells would also.

Response 2-14: Temporary dewatering may be necessary for the installation and connection of forcemains to the new WWTF. Due to the shallow groundwater table, it is likely that during construction dewatering would occur. If required, the contractor would be responsible for obtaining a DNR Dewatering Permit.

If the volume of water pumped exceeds 10,000 gallons per day or 1,000,000 gallons per year, the City of Zumbrota would apply for a DNR Water Appropriation Permit in accordance with Minnesota Statute 103G.271. If volumes are smaller, the City would apply for coverage under the DNR General Permit for Temporary Appropriations when the Project meets eligibility criteria (≤ 50 million gallons and < 1 year duration).

Potential environmental effects from dewatering could include temporary drawdown of groundwater levels, minor interference with nearby wells or wetlands, and increased turbidity or sediment in surface water receiving discharge. Limited effects would occur because dewatering would be short-term and construction related, and mitigation measures such as use of settling basins, filtration, and controlled discharge locations are expected to be implemented in accordance with MPCA Dewatering and Basin Draining Guidance. The regional water supply is likely considered adequate to support temporary dewatering needs, but the Project would remain subject to DNR review to confirm availability and sustainability at the time of permit issuance.

Comment 2-15: P.40 mentions construction waste for this project. MPCA's own report looking into groundwater contamination from construction and demolition debris (<https://www.pca.state.mn.us/business-with-us/landfills>) concludes the following: "Self-reported groundwater-monitoring data from unlined C&D landfills in Minnesota shows that a majority have impacted the groundwater at concentrations that have exceeded both human and environmental standards, for Boron, Arsenic, and Manganese. The evidence is strongest for Boron and Manganese, with more information needed concerning Arsenic, given gaps in available data. The problem does not appear to be confined to particular regions of Minnesota and is not being resolved by changes in landfilling practices following the DLGD of 2005. This is because the three contaminants are leaching from what had been previously considered "acceptable," innocuous materials such as concrete, reinforcing steel, and drywall. It is also possible that Manganese and Arsenic native to some Minnesota aquifer sediments are being released through an oxidation-reduction reactions. The "acceptable" materials can also be found in the waste streams going to permit-by-rule demolition landfills and general concrete landfills. These were not evaluated in this report, since they lack groundwater-monitoring systems, but they contain some of the same materials, concrete in particular. The 2005 DLGD was a step forward in laying the foundation for fact-based policy about unlined C&D landfills, because most of them lacked groundwater monitoring and therefore it was not possible for the MPCA to determine whether they were meeting their performance goals of preserving groundwater quality. However, more can be done at existing C&D landfills to monitor performance. Even after 15 years' implementation of the DLGD, this report shows that not all landfills are providing a sufficient assessment of environmental impacts. Some C&D landfills have no monitoring networks, others lack monitoring networks specific to the unlined construction and demolition management areas, and some others have large sampling gaps or use insufficient analytical methods. All groundwater sampling analysis should use a reporting limit that is below the intervention limit.

Response 2-15: Construction waste would be primarily non-hazardous and managed as municipal solid waste or construction debris. Construction and demolition (C&D) debris would be taken to a designated landfill or transfer station. Management and disposal of all construction generated waste would be in accordance with MPCA requirements and all other applicable regulatory requirements. Historically, some older and smaller C&D landfills were built without liners or monitoring systems. The MPCA plans to amend existing Minnesota Rules governing permits and solid waste landfills (chapters 7001 and 7035) and is actively updating its rules. The goal is to update these rules by incorporating lessons learned about the potential for groundwater impacts of unlined C&D landfills. The upcoming C&D rule requires all permitted landfills to be lined, install leachate collection systems, implement strict groundwater monitoring, and have financial assurance for closure.

Comment 2-16: For this project please ensure that: 1) a C & D waste reduction plan is included in the environmental review to minimize not only the need for landfills but also the risk of materials (those included in the groundwater report as well as the EAW) that could leach contaminants in the first place 2) the name and location of the C & D facility where any construction waste would be disposed of along with the groundwater monitoring reports and any compliance violations. 3) include a requirement that C & D waste must be disposed of at a facility that has groundwater monitoring in place and is in compliance.

Response 2-16: The NZSSD WWTF would follow MPCA requirements and other regulations pertaining to the disposal of solid waste for construction waste generated. Construction waste would be typical of the construction of new structures, infrastructures, and forcemain installation. Construction waste would be primarily non-hazardous and managed as municipal solid waste or construction debris. Any hazardous waste generated would likely be in the form of oil/lubricants, waste paints, or other materials generated during construction. A licensed waste hauler would manage all waste generated by WWTF workers during construction and operation.

Comment 2-17: On the very first page of Appendix J it says "A calcareous fen (Wanamingo 22, Fen ID#29025) was documented approximately 3 miles from the proposed project. A calcareous fen is a rare and distinctive peat-

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accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act (WCA), authorized by Minnesota Statutes, section 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the commissioner of the Department of Natural Resources. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of this dependence on groundwater hydrology, calcareous fens can be affected by nearby activities or even those several miles away.

Response 2-17: Comment noted. The Natural Heritage Inventory System (NHIS) included that a review of publicly available data from the Minnesota Conservation Explorer showed the Project Area does not contain any calcareous fens. Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g., groundwater pumping, contamination, or discharge) even several miles away. Given the Project details, impacts are not anticipated. Please also see response to comments 2-2 and comment 19-2.

Comment 2-18: For more information regarding calcareous fens, please see the Calcareous Fen Fact Sheet. To minimize stormwater impacts, please refer to the Minnesota Pollution Control Agency's General Principles for Erosion Prevention and Sediment Control in the Minnesota Stormwater Manual. Please note that calcareous fens are "Special Waters" and a buffer zone may be required. Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g., groundwater North Zumbro Sanitary District MCE-2025-00612 Page 2 of 6 pumping, contamination, or discharge) even several miles away. Given the project details, impacts are not anticipated. If the proposed project will alter the hydrological conditions in the surrounding area, contact the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us).

Response 2-18: Comment noted. Information will be sent to NZSSD.

Comment 2-19: There is also going to need to be further analysis of the mitigation plans listed and how they intersect with insect species for example. Doing construction on frozen ground may help mitigate harm to a tree species but may cause undue harm to an insect species like the fireflies or bees that hibernate and burrow during the winter and are facing population decline. While a mitigation strategy of construction is frozen ground is a mention of a seasonal timeframe it is the only mention of seasonal timeframes given for plants and that is also an oversight that would need to be corrected for proper mitigation strategies. You would need to know specific times of day that are less likely to interfere with pollinators and ensure construction is not happening at a critical time when an insect species that depends on that plan as its host plant is spawning for example. You don't want construction to happen at critical times for the plant when accidentally damaging it would result in preventing it from blooming for example.

Response 2-19: The Project is not expected to affect any of the threatened/endangered species, sensitive features, or ecosystems identified because the Project is mostly being completed in previously disturbed areas. Construction plans will add implementation of the recommendations put forth by the Department of Natural Resources (DNR) and/or U.S. Fish and Wildlife Service (USFWS) listed in the EAW. These include retaining a buffer between proposed activities and Minnesota Biological Survey (MBS) sites, inspecting and cleaning equipment prior to entering the MBS sites, using effective erosion prevention and sediment control measures, and using weed-free mulches, topsoil and seed mixes, and working within already disturbed areas. If possible, the MBS sites would be avoided altogether, but if not feasible, other mitigation measures such as the use of HDD would be used.

A review of publicly available data from the Minnesota Conservation Explorer showed the Project Area does not contain any calcareous fens, old growth stands, Lakes of Biological Significance, U.S. Fish and Wildlife Service (USFWS) Regulatory areas, Prairie Conservation areas, or Audubon MN Important Bird Areas.

Comment 2-20: p.41 Reiterating a previous comment of mine and also clarifying-as a resident I would like specifics included in a waste management plan. I'd like the licensed waste haulers that will be used or a list of the ones that could be used to be named along with any compliance violations. I'd like assurances that groundwater monitoring is in place at the designated waste facilities where waste is being disposed. It's important to specify what street traffic would be moved onto for impacts-residents have to pay for the wear and tear of the 17 truckloads a day and they need a say as to what streets are better and what days and times of day are better. It is not specified how many days those 17 truckloads a day would be running, that is important information we need to know. 17 truckloads a day for 10 days? 30 days? 6 months? Is it during school hours or times when our children are crossing the street?

Response 2-20: During Project construction, eight to ten vehicle trips per day would be necessary for the crews to travel to and from the Project Area, plus an additional three trips to move material away or onto the Project Area from 7 a.m. to 10 p.m. This will not result in more than ten additional vehicles per workday. The estimated traffic for the WWTF is ten vehicles a day, and peak traffic will increase by three vehicles at the peak times of 7 a.m. to 3 p.m.

Approximately 5.2 million/gallons (MG) of biosolids would be generated annually and transported an average of 20 miles round trip for application. Trucks will travel from the WWTF on a new local street, connecting to County Road 10 Boulevard south of the proposed facility site. Peak hauling operations are anticipated to generate approximately 17 truckloads per day (8,000-gallon tanker semis) over roughly 22 days during both the spring and fall seasons. All waste hauling will be managed by waste haulers licensed through the MPCA. Biosolids will be land-applied on nearby agricultural fields in accordance with Minnesota regulations (Minn. R. 7041). Please also see response to comment 2-16.

Comment 2-21: It says excess PFAS can be released and contaminate groundwater-how is this excess going to be measured and with what frequency? Who's responsibility is it to measure the baseline once it's on the fields? Will the landowners get a printed report with all the baseline numbers on it for reference as well as printed reports with follow up measurements? Will those printed reports also be available for the general public as well? If not then this needs to be included. What is the recourse community members have if negative health outcomes develop down the road and biosolids are suspected as a potential cause, especially given that protections and regulations are not fully in place but may be in the process of being developed? Please ensure that protections apply to the community as a whole, not just landowners that apply biosolids given the nature of contaminants crossing property lines.

Response 2-21: Land application of biosolids would occur on agricultural land near the WWTF per Minnesota regulations (Minn. R. 7041). Management of harmful contaminants and nutrient levels would occur through regulatory limits on application rates through the NPDES/SDS permit requirements for this Project.

Comment 2-22: There should be a more comprehensive list of the negative impacts related to nutrient levels and mitigation than what's included in this EAW. This is an agricultural community and nutrient levels in our ground are a big deal. Oh, it'd also be very important that the groundwater monitoring wells near us here be updated more frequently than they have been <https://www.dnr.state.mn.us/waters/cgm/index.html> and it'd be nice to have a well closer to this location.

Response 2-22: See response to comment 2-21.

Comment 2-23: Oh, forgot to ask in previous comment regarding the Calcareous Fen, how do the biosolids impact this plant? It seems like the application of the biosolids needs to include this particular plant in the equation as

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this plant would likely be particularly sensitive and at risk of adverse effects. How is this plant being monitored? Are there indicator species for this plant that could give earlier warnings that this specific plant is decline that we need to be paying attention to and get more citizen science people monitoring?

Response 2-23: A review of publicly available data from the Minnesota Conservation Explorer showed the Project Area does not contain any calcareous fens. Please also see response to comment 2-17.

Comment 2-24: With biosolids in general, given that there seems to be several plant species listed as endangered, imperiled, species of concern or otherwise in jeopardy we really need to be paying attention to methods such as biosolids that we think are "safe" given that PFAS was considered safe and we know how that went. Groundwater contamination from C&D waste that's been considered "safe" has been significant (see previous comment). We have a bad habit of writing things off as "safe" when they're not and listening more to corporations than residents and scientists.

Response 2-24: Comment noted.

Comment 2-25: I strongly challenge the wording on p.45 "the project was deemed to have no effect on the Whooping crane, monarch butterfly, rusty patched bumble bee and prairie bush-clover." That just sounds like lazy science. All the pieces of your project are interconnected and your job during environmental review is to show how they are interconnected and how to mitigate the risks and harms, particularly the harms that come from the thinking that part A over here has no effect on part C over here. First off, the timing of this public comment period being in March/April makes it difficult for citizen scientists to run over and count all the milkweed that is in fact growing in the area that the EAW claims it's not. The original letter itself was issued in February 2024, further contact was made during the winter of 2025 and 2026, all non-growing seasons.

Response 2-25: The January 22, 2024 IPAC review letter states that there are no critical habitats within the Project Area for the Whooping crane, Monarch butterfly, Rusty Patched bumble bee, and prairie Bush-clover, under the United States Department of the Interior Fish and Wildlife Service-Minnesota-Wisconsin Ecological Services Field Office. It was requested that NZSSD coordinate with the U.S. Fish and Wildlife Service-Minnesota-Wisconsin Ecological Field Office.

The February 22, 2024, IPAC review letter confirmed that NZSSD had concluded a "No Effect" determination based on the Project's details for the Whooping crane, Monarch butterfly, Rusty Patched bumble bee, and prairie Bush-clover. USFWS determined that no further coordination is necessary for these identified species of which NZSSD determined will not be affected by the Project.

Comment 2-26: I can spot milkweed in the ditch going 70mph on the highway because I had a Monarch waystation before moving here and raised monarchs. Lone milkweed plants are still valuable and are in cases preferred because they're less likely to be targeted by predators than large clumps of milkweed. So an area like this project area that might have more scattered milkweed plants versus large clumps of it will still have an impact on the monarch, not no impact.

Response 2-26: Please see response to comment 2-25.

Comment 2-27: Further, the biosolids used as waste management strategy do in fact have an impact on insects like monarchs (<https://pmc.ncbi.nlm.nih.gov/articles/PMC7468139/>, <https://www.sciencedirect.com/science/article/pii/S2405844023069967>) whose host plants are likely to be on the fringe of agricultural fields where biosolids are spread or are randomly growing in the midst of crops. There is messaging to encourage the growth of pollinator plants in the midst of crops rather than discourage it because

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pollination helps everyone out. Milkweed too is also considered a "weed" and is therefore targeted by herbicides which therefore affect the monarch as well since herbicides are a chemical found in biosolids. The chemicals in biosolids end up being ingested by the caterpillars and have an effect on the adult wingspan making the wingspan smaller. For monarchs this matters because the 4th generation that hatches in the fall is the generation that migrates and they are bigger because of the need to migrate. Size matters for species survival.

Response 2-27: Contaminant levels in land applied biosolids are monitored for a variety of parameters in accordance with Minn. R. 7041.3200, 7041.1300 and 7041.1400 and will have pollutant limits set forth in the draft NPDES permit. Biosolid land application will be subject to storage, transportation, pollutant limits, pathogen and vector reduction, application/harvest time restrictions, application management, and monitoring, recording, and permitting requirements per the associated draft NPDES permit and management practices and limitations in accordance with Minn. R. 7041.1200. Please also see response to comment 2-25.

Comment 2-28: Biosolids are laid in the fall and the timing of that fall spread matters for the larvae that would consume the plants that come in contact with those biosolids. Then you have to show in your plan with biosolids that you have taken into account the monarch butterfly and how your mitigation strategy prevents undue harm to this proposed threatened species. You cannot say "this project has no impact on Monarchs." There is a significant rule change coming down the line soon regarding the status of the Monarch caterpillar. It would probably be wise to wait for that rule change before moving forward to ensure no irreparable harm is coming to that species. That or I need assurances that this project will go the extra mile with all documentation and act as if the rule as has already been adopted and Monarchs are officially classified as threatened.

Response 2-28: Please see response to comment 2-25 and comment 2-27.

Comment 2-29: P.41 The prompt specifically says to "discuss potential environmental effects from an accidental release or spill 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." There is no discussion whatsoever of the potential environmental effects from an accidental spill or release of any of the hazardous chemicals/products and there should be--petroleum, engine fluids, fuel, oil and there may be 3,000 gallons of that up the street from my house? Most people already have an idea that there's significant environmental impacts from petroleum products but you still need to specifically list it during environmental review and the mitigation strategies.

Response 2-29: The NPDES/SDS Permit for this Project would include the Spill Prevention and Response Requirements. The Permittee shall develop and implement a spill prevention and response procedure. The Permittee shall include a minimum of the following components with the SWPPP or in a separate SPCC document: A. Areas where the storage, transfer, or use of solid or liquid significant materials occurs and, where spills and leaks of the material may potentially contribute pollutants to stormwater discharges; B. Identify areas, monitoring locations and surface waters that may be affected by spills, leaks, or discharges from emergency firefighting activities; C. Report and document spills or leaks (pursuant to Minn. Stat. 115.061) that occur in exposed areas, or that drain to a monitoring location; D. Material handling procedures, storage requirements, and cleanup equipment/materials and procedures necessary to recover as rapidly and thoroughly as possible spills or leaks pursuant to Minn. Stat. 115.061. The Permittee shall make all methods and procedures available to appropriate facility personnel; and E. Contact information for individuals and emergency and regulatory agencies that require notification in the event of a spill. When a spill or discharge of a potentially polluting material occurs, the Permittee shall immediately notify the Minnesota Department of Public Safety Duty Officer at 800-422-0798 or 651-649-5451 (metro area) per Minn. Stat. 115.061. [Minn. R. 7090].

Comment 2-30: There also needs to be a clear traffic plan in place. With where I live in Pine Island at county 11 traffic circle that's our only exit and there needs to be explicit communication NOT to have these trucks hauling these hazardous materials getting off at the county 11 exit to go north on the frontage road to 195th where they need to be putting in the new water lines at the data center site for this project. If one of these tankers were to crash and 3,000 gallons of fuel were to spill it'd be spilling right in front of our homes in residential areas (another reason why data centers are not light industrial and don't belong anywhere near residential but they didn't listen to us). I also don't see any mention of actual mitigation strategies. There is mention that spill plans exist and it's likely mitigation strategies exist in those spill plans but simply stating a spill plan exists doesn't actually help me as an affected resident know how you're mitigating the risk to my community.

Response 2-30: Please see response to comment 2-20.

Comment 2-31: For future reference for all environmental reviews, please include a table of contents and page numbers. For the appendices y'all attached a 585 page document that contains F-O but there's no table of contents with page numbers, which makes it very difficult to actually find what you're looking for. There's also reference to an appendix P on p.47 but there is no 'P' included in the documentation made available to the public.

Response 2-31: Appendix F-O was mislabeled when uploaded to MPCA's website. The file contains Appendices F-R.

Comment 2-32: P.20 Appendix N-I'm a little confused-are the Stantec people supposed to be finding out more information on the people connected to the artifacts they found or are they only required to look in the census? If they're required to do more digging they're not doing a very good job and they seem to be weirdly oblivious of the fact they already know the Schlieps and they could just ask.

Response 2-32: Stantec's archeological report identified that ownership information from historic maps identified individuals from two families, including the Schlieps. However, the historic material found cannot be associated with any mapped structure and the materials were found in an eroded setting along a side-slope with modern trash, therefore the historic concentration was not assigned a site number and does not fall into the requirements of needing additional archeological work or investigation.

Comment 2-33: Stantec did the AUAR in Pine Island for the data center and the Schlieps own a significant portion of the land for it that Stantec also had to return back to to complete this Archaeological Reconnaissance Survey unless I'm mistaken. Seems odd they wouldn't just ask the family here that's probably connected to the historical artifacts they found...

Response 2-33: Comment noted.

Comment 2-34: I have seen communication from Stantec to Pine Island specifically stating that Tribal communities do not have the staff, time or resources to respond within the 30 day public commenting windows. Given that this project directly affects Prairie Island and I believe is also connected to some funding through them, I strongly encourage going above and beyond to ensure their voice is heard in this project as that's also just the right thing to do. If that means MPCA sends a representative into the community to answer questions and/or opens another commenting window or extends the commenting window then you need to do that. It's also very important that MIAC's response is received. Another important component of looking at the project site and the plant species is the medicinal aspect of the plants growing there and whether areas of the zumbro that could be impacted by this project are important foraging areas.

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Response 2-34: Comment noted. NZSSD made multiple attempts to contact the MIAC office via phone and email, and no response received. In addition, MPCA sent out a notice about the availability of the EAW and the ability to provide comment during the 30 days it was on public notice to interested parties, including local government officials, tribal contacts for the Mille Lacs Band of Ojibwe and Prairie Island Indian Communities, and Federal and State Tribal Liaisons.

Comment 2-35: For p.49 section 16-While amber lighting reduces ecological impact and that's great to see it on your plan, in as many areas as possible where lighting is needed at night red lights are even better as the wavelengths are practically invisible to most insects. Red lights are particularly good for fireflies, which will definitely be present around the site, are particularly loved and the mating season is at dusk May-July. Have a plan to switch light bulb colors out if you need to to protect the bugs that people love, even if they're not yet on an endangered list (they're getting close to being there though so let's not let that happen).

Response 2-35: Thank you for your response. The nominal color temperature selected for exterior lighting will be approximately 2,700 Kelvin, which produces a warm white light that reduces ecological impacts and minimizes disturbance to residents. These measures will avoid or minimize potential visual effects associated with the Project.

Comment 2-36: Cumulative impacts definitely need to be updated to include the data center plans, especially regarding back-up generators and water. Please see the attached report on air pollution/emissions in regards to diesel generators. If the power goes out in the area the WWTF's generator will be added to whatever is happening at the data center plus DFA and Land O Lakes. Pine Island in particular will be hit very hard but air pollution impacts have a large spread.

Response 2-36: Please see the attached EAW errata sheet. Any future industrial projects near the Project would be subject to local, State and Federal permitting, including potential air modeling and permitting requirements.

Comment 2-37: Considering that there's a lot of comments that apply to cumulative impacts and needing more information regarding the data center and how it impacts the project, remember that it's Google you're dealing with in the effort to get the information that you need and Google cannot be trusted. In 2022 a lawsuit was settled over Google hiding water usage under "trade secret" and they said they'd stop doing that (<https://www.rcfp.org/dalles-google-oregonian-settlement/> and <https://sites.suffolk.edu/jhtl/2025/05/21/leaving-the-faucet-running-the-legal-battle-against-gen-ais-water-consumption/>) yet here they're at it again just a few months ago in Virginia hiding their water usage in another lawsuit (<https://www.roanokerambler.com/google-strives-keep-data-center-botetourt-county-water-use-secret-judge-orders-and-then-there-s-the-lawsuit-in-pine-island-where-water-usage-is-again-an-issue-along-with-the-issue-of-energy-usage-where-they-point-blank-told-us-as-residents-it-was-trade-secret-information-and-only-released-it-in-opposing-counsel-court-memorandums-that-most-people-wouldn-t-read-google-also-is-trying-to-build-a-data-center-on-land-in-oklahoma-that-s-under-a-conservation-agreement> (<https://www.newson6.com/tulsa-oklahoma-news/title-issue-could-stop-sand-springs-data-center-development>). They're also not forthcoming about their emissions either (<https://www.theguardian.com/technology/2025/jul/02/google-carbon-emissions-report>). Remember who you're dealing with and don't trust them. Close the loop holes. Pine Island can't be trusted either. We're also less than thrilled at seeing Stantec's continued involvement considering they're also the ones that did the AUAR that is wholly inadequate in the lawsuit. Part of the reason there's more comments, particularly from myself is Pine Island already did their town really dirty, we got left out of public comment and environmental review and someone's gotta stop that from happening again and happening to other communities that are now roped in this. Trust is 100%

Response 2-37: Please see the attached EAW errata sheet.

Comment 2-38: NPR just released a study today linking metals exposure to critical brain development windows in babies and the health effects that show up later in adolescence. <https://www.npr.org/2026/04/29/nx-s1-5803561/baby-teeth-toxic-metals-brain-infants-kids> NPDES permits do cover metals exposure but you do need to factor in data centers and how they contribute to the metals equation and the MPCA needs to be monitoring studies like this to ensure that the regulations are up to date regarding quantities. Environmental review needs to be addressing issues such as this because this will then again show up in the biosolids. The effects will also impact the plant and animal species.

Response 2-38: Comment noted.

3. Comments by Rodney Lanners. Letter received April 15, 2026.

Comment 3-1: Residents should be aware that the City of Pine Island is considering sending wastewater from a proposed Google hyperscale data center to the joint wastewater treatment facility. At this time, the specific volume, chemical composition, and potential environmental impacts of that discharge have not been publicly disclosed. Before moving forward, it is essential that detailed information be provided, including the types of chemicals involved, expected quantities, and a clear mitigation and monitoring plan to ensure the safety of the treatment system, local waterways, and public health. Transparency and thorough review should be a prerequisite for any agreement of this scale.

Response 3-1: Please see response to comment 2-1.

4. Comments by Nicole Mills. Letter received April 16, 2026.

Comment 4-1: On Page 8 of Appendix B (Feasibility Study) of the EAW for the WWTF, the future projections for Pine Island are noted. It mentions future population growth due to potentially 200 homes to be constructed in the Elk Run area, and it assigns an estimate of 500 towards population growth due to these potential homes being constructed. It's then asserted that this increase in population will lead to additional commercial and industrial growth. It is also estimated that 80,000 gpd of future flow will be expected from these sources.

Response 4-1: Housing is the largest type of land use for the City of Zumbrota and has a significant impact on future development plans. Currently, an expected population growth of 1.7%, to reach over 4,000 people by 2030. The Comprehensive plan is to create housing to compensate for this growth in population. The Project does not include any housing, however the Project intends to support the communities of Zumbrota, Pine Island, Wanamingo, and Goodhue during their expected growth, as their existing WWTFs are outdated and limit growth potential within the communities. Effluent for this Project would be discharged within NPDES Permit limits to avoid wastewater treatment system disturbance and the Project would allow for the anticipated increase in population. Please also see response to comment 2-1.

Comment 4-2: I see NO mention of the hyper scale data center The City of Pine Island recently approved in this EAW for the WWTF. Why is that?? While this feasibility study is dated October, 2021, it should absolutely be updated to include the water usage estimates for the Google data center that is slated to begin construction soon. Called "Project Skyway," the City of Pine Island website has an estimate of 152,000 gpd to be used by the data center. This would put the projected annual use at 55,480,000 gallons of water. Add THAT number to the current Pine Island average use of 110,000,000 gallons per year, and we're at 165,480,000 gallons of water used annually. Is

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it a coincidence that this number is JUST below the amount (166,000,000) the DNR permitted the City of Pine Island? I'm guessing not.

Response 4-2: Please see response to comment 2-1 and comment 2-6.

Comment 4-3: So, if Pine Island is looking at using an estimated total of 165,480,000 gallons of water annually, accounting for the current Pine Island population AND the incoming data center, how do we factor in the additional water use for the 200 homes (estimated 500 people) Pine Island is expecting in Elk Run? The additional 29,200,000 gallons of water used annually. This addition will, without a doubt, put Pine Island above its current DNR permitted use, and will trigger an amendment to its water appropriations permit with the DNR, AND will require additional studies.

Response 4-3: Projected wastewater flows for anticipated industrial and commercial development including Project Skyway were included in Pine Island's design flow estimates. Future residential and industrial growth have been taken into consideration when developing WWTF design and flow standards-The new WWTF would have the capacity to treat approximately 1.496 billion gallons of wastewater annually, with an average wet weather capacity of 4.1 million gallons per day (MGD). Please also see response to comment 2-1.

Comment 4-4: I'm wondering, what are the additional studies that will be needed? And if we can safely assume these will be needed, as the data center HAS been approved, and we as community members have been assured this will lead to further growth of the Pine Island area, why not do them now? Or if they can't be done now, due to the current WWTF system in use by Pine Island already failing, why...at the very least, is the proposed data center water usage not being factored into this feasibility study for the WWTF that Pine Island will be sharing with three surrounding communities?

Response 4-4: If the volume of water pumped exceeds 10,000 gallons per day or 1,000,000 gallons per year during the operation of the WWTF, the City of Zumbrota would apply for a DNR Water Appropriation Permit in accordance with Minnesota Statute 103G.271. The Project would remain subject to DNR review to confirm availability and sustainability of water usage at the time of Water Appropriation Permit issuance if needed. A NPDES/SDS Construction Stormwater Permit would be used during construction of the WWTF for dewatering. Please also see response to comment 2-1.

Comment 4-5: I'm wondering if the City of Pine Island is simply going the route of it's easier to ask for forgiveness than it is for permission in regards to its water usage once both the data center and the future Elk Run housing development are here. Maybe it doesn't matter that Pine Island's water usage numbers seem to be off, but as they're asking three other communities to help foot the bill for the WWTF so that it can be shared by all, I would think it would matter, at the very least, to the other communities; Zumbrota, Goodhue, and Wanamingo. Because while the data center may affect the Pine Island community the most, I've little doubt our fellow WWTF communities will feel its presence also.

Response 4-5: Comment noted.

5. **Comments by Jason Huso. Letter received April 24, 2026.**

Comment 5-1: It doesn't appear that your current design has considered the additional potential waste water source from the massive Google data center that has been approved for construction immediately North of Pine island? The combined waste cooling water effluent from that project (up to 9 individual consolidated data centers) is likewise massive. In addition to factoring that into the design of the proposed new waste water treatment facility infrastructure, the entities responsible for generating those large incremental effluents needs

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to bear the associated cost, just as your design has required of other large local sources contributing to the system inflow (i.e., dairy farm). Considering the significant controversy, public attention, and legislative activity surrounding the data centers, I find it rather surprising that this proposal hadn't already considered that.

Response 5-1: Please see response to comment 2-1.

6. Comments by Janet Hanke. Letter received April 28, 2026.

Comment 6-1: I support the NZSSD as proposed, if the design includes contingencies for population growth in the covered areas. This area is notorious for building public facilities that are adequate now but are almost immediately too small for the populations they are meant to serve.

Response 6-1: The proposed project is being designed to replace aging infrastructure in the four communities it would serve. The current infrastructure has limited potential to accommodate additional growth. The proposed project intends to support the communities of Zumbrota, Pine Island (including Prairie Island Indian Community), Wanamingo, and Goodhue during their expected growth in population according to the Zumbrota Comprehensive plan, as their existing WWTFs are outdated and limit growth potential within the communities.

Comment 6-2: In addition, this wastewater facility should not go forward until the current data center proposal is either forced through or denied, as the bulk of our community wishes it to be. They have not been forthcoming about their resources use, water discharge requirements, pollution potential, etc. If the data center will use this wastewater system, it is already obsolete and will cost taxpayers money to provide a multi-billion dollar company with state of the art wastewater treatment leaving the communities involved needing a larger system immediately. Not a good use of our tax dollars.

Response 6-2: Please see response to comment 2-1.

Comment 6-3: As much as our communities need this wastewater treatment system, I urge you to wait until this data center debacle is decided."

Response 6-3: The EAW addresses the project as described in the project description and supporting sections.

7. Comments by Janice Hobbs. Letter received April 29, 2026

Comment 7-1: How much waste water will be discharged from the Google hyperscale data center in Pine Island?

Response 7-1: Please see response to comment 2-1.

Comment 7-2: What contaminants will be in the waste water from this data center?

Response 7-2: Please see response to comment 2-1.

Comment 7-3: How will these contaminants be mitigated?

Response 7-3: Please see response to comment 2-1.

Comment 7-4: How will these contaminants be monitored?

Response 7-4: Please see response to comment 2-1.

Comment 7-5: How will the strategy of using bio solids to manage waste disposal impact insects and plants? Your analysis of this is not complete. Because I have noted that a Ms. Derkson has thoroughly provided in her comments why your analysis is incomplete, I will not repeat here the insects and plants that were not studied.

Response 7-5: Land-applied biosolids will be applied to agricultural fields in accordance with applicable state and federal regulations for land application. Land application would follow standard agronomic practices and permit requirements. Biosolids shall not be applied to the land if it is likely to adversely affect a threatened or

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endangered species listed under Section 4 of the Endangered Species Act or its designated critical habitat.
Please also see response to comment 2-21.

Comment 7-6: What contaminants in the bio solids could leach into the soil?

Response 7-6: Please see response to comment 2-27.

Comment: 7-7: How will this system address PFAS and their removal?

Response 7-7: Municipal WWTFs are conduits of PFAS. PFAS loads coming into the plant are not removed (treated) prior to discharge, but the processes involved in treating wastewater for other contaminants do not generate or contribute additional PFAS to the environment. The MPCA is currently developing an NPDES/SDS permitting strategy for PFAS at the time of this EAW. The proposed NPDES permit does not require monitoring but monitoring for one or more PFAS compounds may be applied in future reissuances.

Comment 7-8: Please do research in regard to studies being done around the country as to how data centers are strong contributors to water pollution. Given the alarming rate of the proliferation of hyperscale data centers, you may need to address these same concerns in the other three cities proposed to be connected to this system, in the not distant future.

Response 7-8: Thank you for your comment.

Comment 7-9: Please be thorough in studying the impact on the environment; the water, flora and fauna.

Response 7-9: Thank you for your comment.

Comment 7-10: Please remember the lessons which should have been learned by the DuPont company poisoning of our fellow citizens.

Response 7-10: Thank you for your comment.

Comment 7-11: To proceed with this project with inadequate information is putting our citizens and our environment at risk of great harm.

Response 7-11: Thank you for your comment.

8. Comments by Kahla Jourdan. Letter received April 29, 2026

Comment 8-1: I noticed that there is NO mention of the incoming hyperscale data center coming to Pine Island in the study. The study needs to be updated to reflect the massive impact this data center will have on the joint waste water treatment facility.

Response 8-1: Any new industrial users of the WWTF would be required to request capacity increases before the Joint Powers Board, which includes representatives from the communities of Goodhue, Pine Island (Prairie Island Indian Community), Wanamingo, and Zumbrota. All changes to design flow of the WWTF would be subject to environmental review and NPDES permitting review and regulation. Any future potential industrial operation that may result in requests for design flow capacity change to the WWTF area is beyond the scope of this EAW.

9. Comments by Kami Johnson. Letter received April 29, 2026

Comment 9-1: This WWTF needs to take into account the MASSIVE data center approved by the Pine Island city council. This huge increase in usage by this data center will surely require a new review process and serious consideration for this proposed WWTF for all 4 communities AND the huge data center now in the works.

Response 9-1: Please see response to comments 2-1 and 8-1.

10. Comments by David Wilson. Letter received April 29, 2026

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Comment 10-1: This waste water project isn't accounting for the new proposed data center(s). I feel it's inadequate projections made before any of these latest proposals.

Response 10-1: Please see response to comments 2-1 and 8-1.

11. Comments by Peter Reuss. Letter received April 29, 2026

Comment 11-1: I don't see where the proposed hyperscale data center coming to Pine Island fits into this. It seems that, if the data center's water goes to the treatment facility, that should be taken into account and will significantly change the needs. This feels like just one more place where the impact of the data center is being brushed under the rug.

Response 11-1: Please see response to comments 2-1 and 8-1.

12. Comments by David Derksen. Letter received April 29, 2026

Comment 12-1: Has capacity for this treatment center taken into account population growth along with the approved data center development in Pine Island? The AUAR for the Pine Island hyperscale data center leaves the door open for a 3,000,000 square foot industrial development (see <https://pineislandmn.gov/index.asp?SEC=8DDF3A88-3207-4080-95C8A6E85C2C38C&DE=AB52F777-B22E-A300,000> square foot data center is already approved for building and approved to be hooked up to city sewer. Is a development of that scale suitable for this waste treatment system that was designed for primarily agrarian communities?

Response 12-1: Please see response to comments 2-1 and 8-1.

Comment 12-2: "NZSSD submitted a Cultural Resources Project Review to the Minnesota Indian Affairs Council (MIAC) on March 4, 2025, August 27, 2025, and October 13, 2025, to confirm that there are no Project impacts to cultural resources in their database (Appendix O). NZSSD made multiple attempts to contact the MIAC office via phone and email, and no response received. If a response is received from MIAC, it will be added as an addendum" (EAW, 47). While I understand some effort has been put into getting feedback from the MIAC as stated above from the EAW, wouldn't it be prudent to wait for this feedback before proceeding with this project? An addendum might not suffice if they know of historical items or structures this development might disturb.

Response 12-2: Please see response to comment 2-34.

13. Comments by Amanda Nygaard. Letter received April 29, 2026

Comment 13-1: I am not opposed to the wastewater treatment project itself to support our communities and residents. However, the EAW does not appear to be all-encompassing as it does not state that the proposed Data Center in Pine Island plans to utilize this facility as well. Our tax payer dollars should be used for upgrades that directly support the residents of our surrounding towns not multimillion dollar corporations that will take advantage of the brand new facility. It would be beneficial to request additional information regarding the Data Center and its full expected use of the facility before proceeding.

Response 13-1: Please see response to comment 2-1.

14. Comments by Darcie Simpson. Letter received April 29, 2026

Comment 14-1: This EAW appears to have been completed in December 2022. At least that is what is included on this site for review and comment. Since that time, Pine Island has approved the development of a hyper scale data center (02/2026), which will be nearly three million square feet at full build out. The data center will be tapping into the municipal water of Pine Island and discarding its waste water in the new WWTF. There is no mention of the data center in the EAW. I strongly urge you to have a new EAW completed. It should disclose the amount of water the data center will use and empty into the WWTF. It should also disclose what chemicals will be used in their closed loop cooling system because that water will be flushed from their system releasing those unknown chemicals.

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Response 14-1: December 2022 is the date the standard EAW template was last updated. The EAW was completed and put on public notice March 31, 2026. Please also see response to comment 2-1.

Comment 14-2: Can the WWTF treat and neutralize those chemicals or will they end up in the Zumbro River wreaking havoc on the environment and potentially affecting our health and food supply? Before moving forward with this project, please complete a full environmental impact study or at the very least a new EAW, so that citizens of all the communities involved can be reassured that our water and environment will be safe from the waste created by the massive data center.

Response 14-2: The WWTF will have a NPDES/SDS Permit through the MPCA, where NZSSD will be required to comply with state regulations including effluent limits for chemicals in the wastewater discharged from the facility. Please also see response to comment 2-1.

15. Comments by Melissa Collins, DNR. Letter received April 30, 2026

Comment 15-1: Page 21, Zoning. DNR appreciates that the new wastewater treatment facility (WWTF) will be located outside of a floodplain replacing older WWTF that are currently located within floodplains.

Response 15-1: Comment noted.

Comment 15-2: Page 21, Cumulative Potential Effects. There appear to be several projects in the area that could potentially be considered as cumulative effects. For example, will Project Skyway, a new data center, utilize this new WWTF? Will the data center be partnering with the WWTF to reuse treated effluent as a water conservation measure as proposed by other data centers in the region?

Response 15-2: Please see response to comment 2-1 and the EAW errata sheet.

Comment 15-3: Also, the last figure (page 75 of the pdf) shows a connected housing development on the same plan sheet. Is this development connected to the WWTF?

Response 15-3: The new WWTF would not be structurally connected to the housing development.

16. Comments by Erica Kettner. Letter received April 29, 2026

Comment 16-1: I am very worried about our water supply. We have well on our century farm. I worry about my health and the animals wild and domestic. We have endangered salamanders in our stream. What will happen to them if their habitat dries up. We have eagles, owls, and Hawks. They all could be greatly impacted. They may not be able to raise their young if the data center effects our current habitat. We don't need nor want any change to our environment. No data center, no sewer, no proper lines! Minnesota should protect this beautiful land. Once it is destroyed you can't get it back!

Response 16-1: Please see response to comments 2-14, 2-19, and 2-23.

17. Comments by Roxann Voigt. Letter received April 29, 2026

Comment 17-1: I am very concerned that this project was developed before the pine Island data center was an imminent threat to our water supply. How will this affect all these communities? Don't we need to stop and refigure the impact?

Response 17-1: Please see response to comment 2-1 and 2-3.

18. Comments by Mary Bakeberg. Letter received April 29, 2026

Comment 18-1: The joint wastewater treatment facility is much needed and should benefit the cities involved in the project. There is however, some very important information missing before the project is approved. The Pine Island hyperscale AI data center use of water and chemicals needs to be investigated before a final decision is reached.

Response 18-1: Comment noted. Please see response to comment 2-1.

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Comment 18-2: Due to NDAs signed by members of Pine Island's city council and administrators, exact numbers are in question. There is discrepancy between numbers released to the public and those found in written documents. This project should not proceed until accurate, truthful numbers on the data center wastewater amounts and pollutants, INCLUDING FUTURE DATA CENTER PROJECTS PROPOSED ON THE SAME SITE, are released so that the joint wastewater treatment facility can be properly evaluated.

Response 18-2: Please see response to comment 2-1.

19. Comments by Kelly Leibold. Letter received April 29, 2026

Comment 19-1: I currently sit on the La Crosse County WI Board of Supervisors but I grew up in southeastern Minnesota, serving on the Pine Island MN City Council from 2019 to 2022. I don't believe data center usage was factored into this development, using over 5 million gallons a year. There's also an argument to be made about health impacts tied to water quality, bio solids being laid on nearby fields.

Response 19-1: Please see response to comment 2-1 and 2-21.

Comment 19-2: Are there plans for stormwater mitigation connected/ tangential to this facility? This isn't necessarily a bad thing, many small rural communities need to update their wastewater treatment. I just want to ensure everyone's at the table when this decision is made!

Response 19-2: The impacts during construction include temporary dewatering, and short-term disturbance of wetlands, streams, or roadside ditches crossed by the forcemains. This will be limited in geographic extent and durations and subject to Best Management Practices (BMPs) under the required MPCA NPDES/SDS Construction Stormwater Permit and the NPDES/SDS Industrial Stormwater General Permit. Construction of the WWTF would involve site grading and earthwork, excavation for below-grade tanks and structures, concrete placement, building construction, installation of mechanical and electrical systems, and stormwater management features. NZSSD would develop a Stormwater Pollution Prevention Plan (SWPPP) consistent with NPDES requirements. The SWPPP would identify best management practices (BMPs) for use during construction activities to limit the potential for erosion and sedimentation losses.

20. Comments by Melissa Henry. Letter received April 29, 2026

Comment 20-1: Our community and surrounding communities should be aware that the City of Pine Island is considering a proposal to send wastewater from a planned Google AI hyperscale data center to the joint wastewater treatment facility. At this time, important details—such as how much wastewater would be discharged, what it would contain, and how it could affect our environment—have not been shared publicly. From reading the documents, it doesn't appear that any discussion had occurred prior regarding the data center.

Response 20-1: Please see response to comment 2-1.

Comment 20-2: As neighbors and stakeholders, we all have a vested interest in protecting our local waterways, infrastructure, and public health. Before any decisions are made, the community deserves clear, complete information. This includes the types of chemicals involved, the expected volume of discharge, and a detailed plan for monitoring and minimizing any potential risks. Open communication and careful review are essential to ensuring that any path forward reflects the best interests of our community, now and for the future.

Response 20-2: Management of harmful contaminants and nutrient levels would occur through regulatory limits through the NPDES/SDS Permit requirements for this Project. In addition, the antidegradation report, found in Appendix G indicates the WWTF discharge effluent limits are not anticipated to result in violations of any water quality standards, except for sulfate. The projected future river concentrations are not anticipated to meet the Class 4A 10 mg/L water quality standard for sulfate. The existing ambient river concentrations are higher than the standard. Further evaluation and calculations of sulfate are in the antidegradation report. Please also see response to comment 2-1.

Appendix C

Minnesota Pollution Control Agency

North Zumbro Sanitary Sewer District Environmental Assessment Worksheet (EAW)

Errata sheet

1. Table 7 of the EAW should have included a DNR Utility Crossing License. The corrected table is below.

Table 7. Permits and approvals required by the project

Unit of Government	Type of application	Status
U.S. Army Corps of Engineers (USACE)	Section 404 Permit	Applied for
Minnesota Pollution Control Agency (MPCA)	Section 401 Certification	Applied for (if needed)
MPCA	National Pollutant Discharge Elimination System and State Disposal System (NPDES/SDS) Construction Stormwater Permit MNR100001	Applied for
MPCA	NPDES/SDS Industrial Stormwater General Permit MNR 050000	To be applied for
MPCA	Sewer Extension Permit	Applied for
MPCA	National Pollutant Discharge Elimination System and State Disposal System (NPDES/SDS) Individual Wastewater Permit	Applied for
MPCA	Effluent Limits and Antidegradation Report Review	Review complete
Minnesota Department of Natural Resources (DNR)	Water Appropriation Permit	To be applied for (if needed)
DNR	Utility Crossing License	To be applied for (if needed)
Minnesota Board of Water and Soil Resources (BWSR)	Wetland Conservation Act (WCA) Notice of Decision (NOD)	Obtained
Minnesota Department of Transportation (MN DOT)	Utility Accommodation for Trunk Highway ROW Permit	To be applied for
City of Zumbrota	Conditional Use Permit	To be applied for

2. Page 34, Wastewater. The section references the Crow River instead of the Zumbro River. The corrected sentence should read, "As described, this Project would discharge to the Zumbro River –

North Fork. There are no Class 1 surface waters downstream of the Crow River, North Fork from where it passes near Zumbrota.”

3. Page 43, Rare Features, Item 14.a Forcemains. The two Sites are Pine Island 32 and Pine Island 8, not Pine Island 5. Pine Island 5 was considered for a Site of Biodiversity Significance but ended up being classified as Below. The corrected sentence should read, “Two areas of biodiversity significance identified within the vicinity of the forcemains, Pine Island 8 and Pine Island 32, associated with the Pine Island forcemain.”
4. Page 44, Rare Features, Item 14.b. Please note that under sites of biodiversity, the first one listed should be Pine Island 32, not 22. The corrected sentence should read, “Pine Island 32 is in T109N R15W Section 32, ranked as a High MBS Site with a mapped native plant community in it. This riparian forest, FFs59c – Elm – Ash – Basswood Terrace Forest, has a state conservation rank of S2: Imperiled.”
5. Pages 44-47, Rare Features 14.b-d. The EAW should describe in more detail the activities proposed in proximity to the North Fork of the Zumbro River and the method of crossing. The Natural Heritage Review letter describes rare mussels in the area. Item 14b should include the rare mussels. The corrected text is below.

“A review of the USFWS Information, Planning and Conservation (IPaC) database yielded the following species (**Appendix L**):

Mammals

- Northern Long-eared Bat (*Myotis septentrionalis*) – Endangered
- Tricolored Bat (*Perimyotis subflavus*) – Proposed Endangered

Birds

- Whooping Crane (*Grus americana*) – Experimental population

Insects

- Monarch Butterfly (*Danaus plexippus*) – Candidate
- Rusty Patched Bumble Bee (*Bombus affinis*) – Endangered
- Western Regal Fritillary (*Argynnis idalia occidentalis*) – Proposed Threatened

Flowering Plants

- Minnesota Dwarf Trout Lily (*Erythronium propullans*) – Endangered
- Prairie Bush-clover (*Lespedeza leptostachya*) – Threatened

Mussels

- Ellipse (*Venustaconcha ellipsiformis*) – Threatened
- Fluted-shell (*Lasmigona costata*) – Threatened”

6. Item 14c should discuss potential impacts from construction activities near the North Fork of the Zumbro, including from the crossing of the river by the forcemain and potential scouring of the riverbed from effluent discharge during operation. The corrected text is below.

“The Project is not expected to affect any of the threatened/endangered species, sensitive features, or ecosystems identified in the sections above because the Project is mostly being completed in previously disturbed areas. Warming climate trends and increased precipitation may alter habitat over time and affect species distribution.

Temporary impacts during construction may include soil disturbance, which can increase the potential for invasive species to occur. Actions to mitigate the risk of invasive species may include cleaning and washing of equipment prior to entering the Project Area. It is also important that responsible sourcing of seed and other materials, which may contain seed such as straw, occurs to limit the potential of introducing invasive species to the area. Following construction, the agriculture field would be redesignated as the site for the WWTF. The Project Area is within the Zumbro River Watershed and stormwater will continue to drain into tributaries of the Mississippi River following completion of the Project.

There would be a NPDES/SDS Construction Stormwater permit in place during construction of this Project, that will state the total number of acres that will be disturbed by the Project, including specific best management practices to address soil erosion and sedimentation during and after project construction.

During pump station construction, a SWPPP would minimize impacts to nearby streams and wetlands through erosion and sedimentation controls such as silt fences, bio-logs, mulch, and hydroseeding. During construction activities, implementation of a SWPPP would mitigate erosion and sedimentation and reduce potential impacts to receiving waters. The SWPPP would include that no watercraft currently utilize these streams, and the Project would not impact projected watercraft usage.

Construction of the forcemains would occur within the public right-of-way (ROW). Installation of forcemains would involve temporary clearing of vegetation within the ROW, trench excavation, placement of pipe, backfilling, compaction, and restoration of disturbed areas. Following construction, restoration of disturbed land to preexisting conditions would occur. Completion of restoration activities would be the responsibility of the contractor.”

7. Item 14d should discuss measures to avoid, minimize, or mitigate any adverse effects to mussels. The corrected text is below.

“The MBS sites of biodiversity significance identified in **item 14.b.** have a high potential of adversely affecting fish, wildlife, plant communities, ecosystems and other sensitive ecological resources and will need further review. Construction plans will add implementation of the recommendations put forth by the DNR and/or USFWS listed above. These include retaining a buffer between proposed activities and MBS sites, inspecting and cleaning equipment prior to entering the MBS sites, using effective erosion prevention and sediment control measures, and using weed-free mulches, topsoil and seed mixes, and working within already disturbed areas. If possible, the MBS sites would be avoided altogether, but if not feasible, other mitigation measures such as the use of HDD would be used. If the Project will include any disturbance to the riverbed or any downstream sedimentation in T110N R16W Section 30 or T110N R15W Section 29 or 30, a mussel survey and/or relocation may be required prior to construction. Surveyors, survey protocol, and other requirements before any survey work is initiated would be discussed with the DNR.”

8. Western Regal Fritillary (*Argynnis idalia occidentalis*) – Proposed Threatened was inadvertently listed in EAW item 14.b. This insect is not included in the IPAC review letter.

9. Item 21. B. Cumulative Potential Effects has been updated to include information available about future industrial users of the new WWTF.

There are no reasonably foreseeable future projects included for cumulative analysis beyond the construction and operation of the proposed centralized WWTF, pump stations, and forcemains. Potential future activities such as expansion of the WWTF or demolition of the existing community WWTFs have been identified by the cities as possible future endeavors but are not part of the current Project and therefore not considered within the Project scope. Similarly, local growth and development identified in municipal comprehensive plans may occur independently and is not within the Project scope of review. Any future industrial projects near the Project would be subject to local, State and Federal permitting, including potential air modeling and permitting requirements. Construction of a new data center in Pine Island, Project Skyway, is currently being proposed. Projected wastewater flows for anticipated industrial and commercial development including Project Skyway were included in Pine Island's design flow estimates. Any future potential industrial operation that may result in requests for design flow capacity change to the WWTF area is beyond the scope of this Project. Any new industrial users of the WWTF would be required to request capacity increases before the Joint Powers Board, which includes representatives from the communities of Goodhue, Pine Island (including Prairie Island Indian Community), Wanamingo, and Zumbrota. All changes to design flow of the WWTF may be subject to environmental review and NPDES permitting review and regulation.