

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

Date: September 27, 2025

External Civil Rights Compliance Office (ECRCO) Office of General Counsel U.S. Environmental Protection Agency Mail Code 2310A 1200 Pennsylvania Ave NW Washington, DC 20460 Email: Title_VI_Complaints@epa.gov

Re: Title VI Civil Rights Complaint – Discriminatory Siting of Ranger Power Solar Projects

Respondents

Minnesota Public Utilities Commission (PUC); Iowa Utilities Board; Wisconsin Public Service Commission; and equivalent state agencies in Nebraska, Missouri, and Michigan. Each receives federal financial assistance and has approved or facilitated the siting of Ranger Power projects.

Nature of the Complaint

The listed permitting agencies have enabled Ranger Power to concentrate utility-scale solar projects in small, rural, economically vulnerable communities while bypassing urban areas with stronger political representation.

- Minnesota: Gopher State Solar (Renville County — Kingman, Osceola, and Bird Island Townships); Lemon Hill Solar (Olmsted County — near Viola and Rochester). - Iowa: River City Energy Solar (Cerro Gordo County — near Mason City). The Board of Supervisors has opposed this project, including hiring outside counsel. - Wisconsin: Jefferson, Sheboygan, and Waushara Counties — projects approved despite significant opposition. - Nebraska & Missouri: Similar proposals in rural farm counties with limited legal and financial resources. - Michigan: Additional Ranger Power projects are concentrated in sparsely populated rural townships, again bypassing urban alternatives.

These projects are separated by many miles across states, making collective organizing and communication difficult for residents.

Basis of Discrimination

The pattern demonstrates systematic targeting of rural, majority-white but economically vulnerable populations. While not based on race in the traditional sense, the disparate impacts on politically weaker communities—stripped of local control and burdened with environmental and economic harms—violate Title VI's environmental justice obligations. Urban rooftop and distributed-generation options in Chicago, Minneapolis–St. Paul, Des Moines, and Detroit are consistently ignored.

Harms to the Communities

- Groundwater and environmental risks: Pile-driven anchors subject to frost heave can shift after installation, opening pathways for groundwater contamination, without adequate safeguards. - Economic impacts: Reduced property values, tax-equity burdens, and no compensation for neighboring residents. - Procedural harms: Loss of township/county authority (e.g., Minnesota's 2024 omnibus law), cutting residents out of decision-making. - Isolation: Dispersed siting across rural counties hinders communication and solidarity, diluting residents' ability to participate meaningfully.

Income Evidence

A review of median household incomes across project sites shows a consistent trend: Ranger Power's developments are directed toward economically weaker regions, while more affluent urban areas are bypassed.

County Median Household Incomes (ACS 2019–2023): - Minnesota — Olmsted: \$93,494; Renville: \$69,086. - Within Olmsted, rural Viola and Haverhill Townships: ≈\$51,400 (≈45% lower than the countywide average due to the Mayo Clinic effect). - Iowa — Cerro Gordo: \$65,537. - Wisconsin — Jefferson: \$82,864; Sheboygan: \$71,898; Waushara: \$64,968. - Nebraska — Lancaster: \$72,625. - Michigan — Shiawassee: \$64,464; Cass: \$68,011. - Missouri — Callaway: \$72,645; Henry: \$56,621.

Additional Risk Context

Beyond economic disparities, physical risks from construction and design are troubling. Scientific evidence from Canada shows solar piles can shift within a few years of installation, increasing the risk of contaminant pathways. This is magnified by toxic constituents in solar panels that may be released if panels are damaged by hail or tornadoes. In agricultural regions, heavy rains and storm runoff mobilize farm chemicals, compounding the risk of groundwater contamination and public-health harms.

Labor and Vulnerability

Labor conditions further weaken these communities' ability to defend themselves. In many targeted counties, unemployment rates are higher than state and national averages, signaling ongoing distress. Where unemployment is low (e.g., Olmsted County), Rochester's Mayo Clinic skews the data, masking the reality that rural townships like Viola and Haverhill are far poorer. Residents are either struggling to find stable employment or working long hours across multiple jobs and farms, leaving little time, energy, or resources to organize.

Relief Requested

We respectfully request that EPA: 1. Accept and investigate this multi-state complaint. 2. Review permitting processes in Minnesota, Iowa, Wisconsin, Nebraska, Missouri, and Michigan for compliance with Title VI. 3. Suspend federal funding or approvals until each state demonstrates a nondiscriminatory, environmentally just siting process. 4. Require corrective actions, including serious consideration of urban/rooftop alternatives, robust public participation, and enforceable groundwater protections.

Conclusion

The evidence indicates that Ranger Power and state permitting agencies have concentrated harmful solar projects in small, rural, economically vulnerable communities. This pattern of discriminatory siting undermines environmental justice and denies affected populations their civil rights. We urge EPA to investigate, suspend federal support until fair processes are guaranteed, and require corrective actions that prioritize safer, more equitable energy development. Residents deserve clean water, fair treatment, and a meaningful voice in decisions that shape their future.

Sincerely,

(b)(6) Privacy, (b)(7)(C) Enf. Privacy Spokesman



Legal Memorandum: Pattern of Discrimination in Ranger Power Solar Siting

Executive Summary

Ranger Power has pursued large-scale solar projects across rural Midwest counties that are predominantly white, economically vulnerable, and politically weaker. These sitings appear to illustrate a recurring pattern of environmental and political discrimination. Local resistance has often been overridden by state commissions, and Minnesota's 2024 omnibus law further stripped municipalities of their ability to resist, raising constitutional concerns.

County-by-County Demographics

The following counties illustrate the pattern:

- **Renville County, MN** – Gopher State Solar (rural, predominantly white, limited local power)
- **Olmsted County, MN** – Lemon Hill Solar (near Mayo Clinic, significant groundwater risk)
- **Jefferson, Sheboygan, Waushara Counties, WI** – PSC approval despite strong opposition
- Additional Illinois, Iowa, Missouri, and Nebraska counties show similar demographic profiles.

Findings: Pattern of Discrimination

Ranger Power has allegedly concentrated its projects in rural agricultural counties instead of urban centers. These counties are small, largely white, lower-income, and have fewer resources to litigate or resist. This could result in de facto discrimination against politically weak communities.

2024 Minnesota Omnibus Law Analysis

The Minnesota 2024 omnibus energy legislation stripped small municipalities of their authority to oppose or restrict utility-scale solar projects. This raises serious constitutional issues under home-rule provisions and equal protection doctrines, creating grounds for a potential showdown.

Alternatives Ignored: Rooftop Solar

Ranger Power has avoided rooftop solar in urban centers. For example, Chicago spans roughly 234 square miles, offering vast rooftop space for solar development. By contrast,

rural counties have been disproportionately targeted, despite having fewer residents and weaker political representation.

Legal and Constitutional Issues

Potential claims include:

- Equal Protection violations (targeting politically weak communities)
- Home Rule challenges under Minnesota’s Constitution
- Possible takings and due process issues if landowners are misled about liabilities

These issues could support litigation or a constitutional challenge to Ranger Power’s siting strategy.

Conclusion and Call to Action

The evidence suggests a consistent pattern: Ranger Power has seemingly targeted communities with limited power to resist. Minnesota’s recent law amplifies this injustice, potentially setting up a constitutional confrontation. (b)(6) Privacy, (b)(7)(C) Enfr. Privac calls on allies, legal advocates, and the public to demand accountability and to protect our communities and groundwater from reckless siting practices.

Demographic Comparison Table

County / State	Population	% White	Median Household Income
Renville County, MN ¹	14,723	91%	\$63,000
Olmsted County, MN ²	162,847	84%	\$86,000
Jefferson County, WI ³	85,519	92%	\$75,000
Sheboygan County, WI ⁴	118,034	88%	\$70,000
Waushara County, WI ⁵	24,557	93%	\$61,000

Updated Demographic Comparison Table (2023 ACS / Census)

County / State	Population (est.)	% White (ACS/Census)	Median Household Income
Renville County, MN ¹	14,600–14,700 (2023 est.)	85.7% White (ACS 2023)	\$69,086 (2023)
Olmsted County, MN ²	164,784 (2023 est.)	77.3% White (ACS 2023)	\$93,494 (2019–2023)
Jefferson County, WI ³	85,900 (2023 est.)	95.4% White (ACS 2023)	\$82,864 (2023)



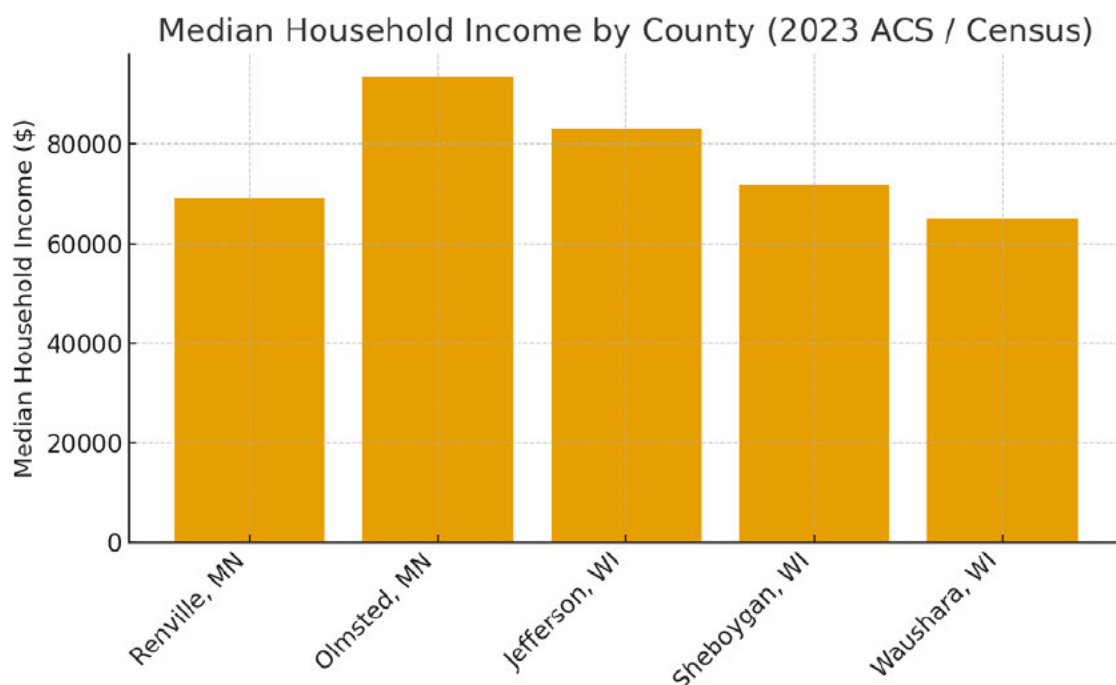
Sheboygan County, WI⁴	118,034 (2023 est.)	88% White (ACS 2023)	\$71,898 (2023)
Waushara County, WI⁵	24,520 (2020 census)	89.9% White (2020)	\$64,968 (2023)

Sources: U.S. Census Bureau (2020 Census; 2019–2023 ACS 5-Year Estimates), DataUSA, Census Reporter, Minnesota Demographics, Olmsted County Community Indicators (2023).

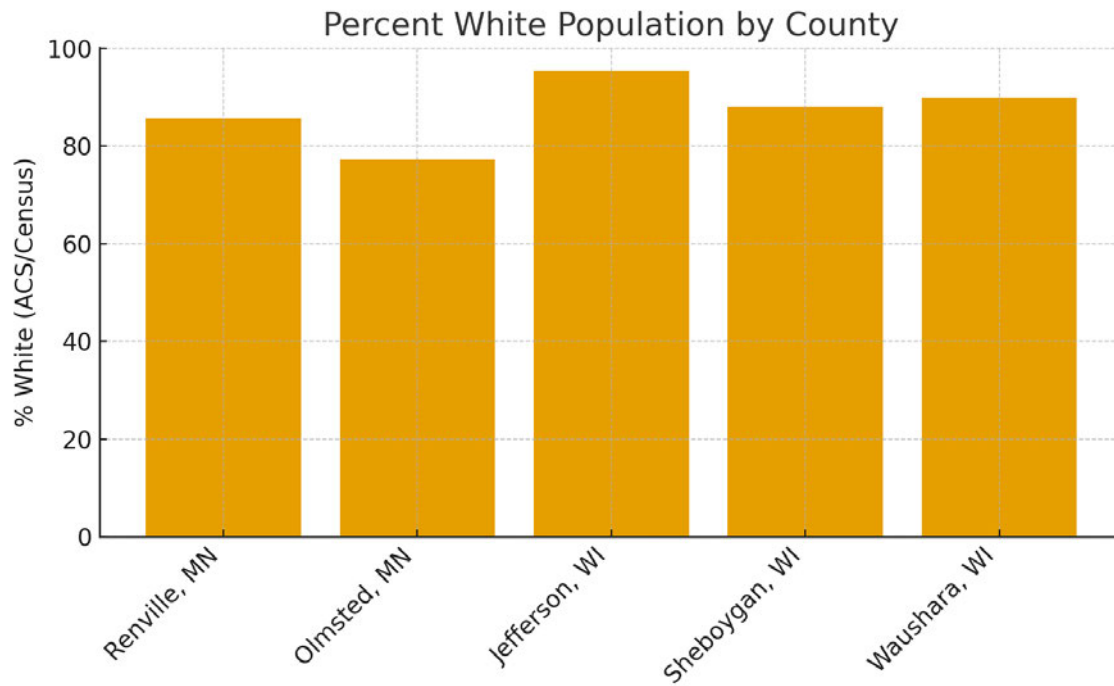
Visual Demographic Comparisons

The following charts illustrate disparities in income and racial demographics across targeted counties.

Median Household Income Comparison:



Percent White Population Comparison:

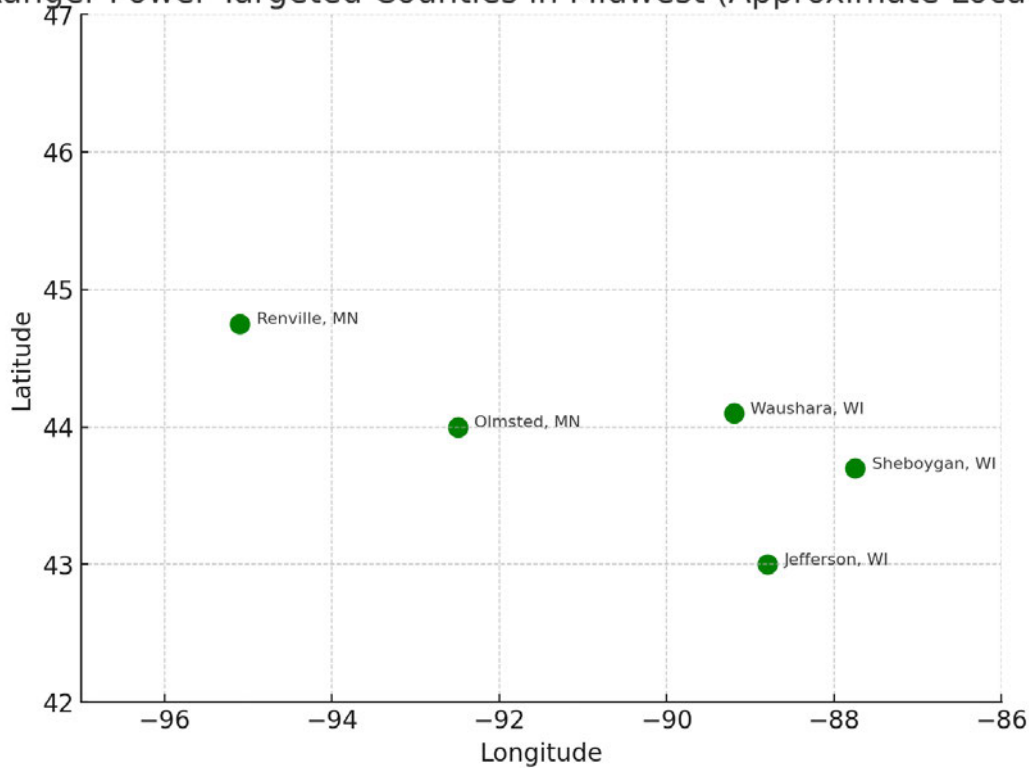


Geographic Concentration Map

Approximate locations of counties where Ranger Power has allegedly targeted solar projects. This simplified map highlights concentration in rural Minnesota and Wisconsin.



Ranger Power Targeted Counties in Midwest (Approximate Location)



Disclaimer: This memorandum is based on publicly available data, reports, and demographic analysis. It does not assert proven legal violations. References to Ranger Power’s practices are framed as seemingly or allegedly based on observed patterns. Readers are encouraged to review the evidence and reach their own conclusions.

¹ Source: U.S. Census Bureau, 2019–2023 ACS 5-Year Estimates; Minnesota Demographics.

² Source: U.S. Census Bureau, 2019–2023 ACS 5-Year Estimates; Olmsted County Community Indicators (2023).

³ Source: U.S. Census Bureau, 2019–2023 ACS 5-Year Estimates; DataUSA (Jefferson County, WI).

⁴ Source: U.S. Census Bureau, 2019–2023 ACS 5-Year Estimates; DataUSA (Sheboygan County, WI).

⁵ Source: U.S. Census Bureau, 2020 Census; DataUSA (Waushara County, WI).

🚗 Strategic Targeting Summary – Ranger Power 🚗

Ranger Power's siting of solar projects in rural Republican-leaning counties is not about finding cheap land. Farmland in counties like Olmsted, Renville, and Lancaster is among the most expensive in the Midwest. The strategy hinges on leases, not purchases: landowners receive steady income while developers avoid the true cost of land ownership.

Key Factors Behind Targeting

- **Lease Economics:** Expensive farmland doesn't deter Ranger Power, since long-term leases shift costs to landowners. Landowners accept for guaranteed income, even if it undercuts community interests.
- **Fragmented Opposition:** Rural populations are sparse and scattered, making grassroots organizing difficult. Residents often work long hours or multiple jobs, limiting civic engagement.
- **Weak Local Governments:** Township boards and county commissions are part-time and underfunded. Developers arrive with legal and financial resources far beyond local capacity.
- **State Preemption:** Laws and commissions in Minnesota, Iowa, Wisconsin, and elsewhere override local decision-making. Even Republican-led county governments can't stop projects if state regulators impose them.
- **Political Shielding:** Opposition framed as 'Republicans resisting clean energy' is politically safer for developers. Targeting rural white counties avoids the Title VI scrutiny that would apply in urban or minority communities.
- **Tax Base Incentives:** Struggling counties with small budgets are more easily enticed by promised tax revenue.

Bottom Line

Ranger Power targets expensive farmland in rural, Republican-leaning counties because these areas combine:

- Willing landowners attracted by lease income
- Dispersed populations with limited organizing capacity
- Weak local governments and stripped authority
- State-level mandates that override objections

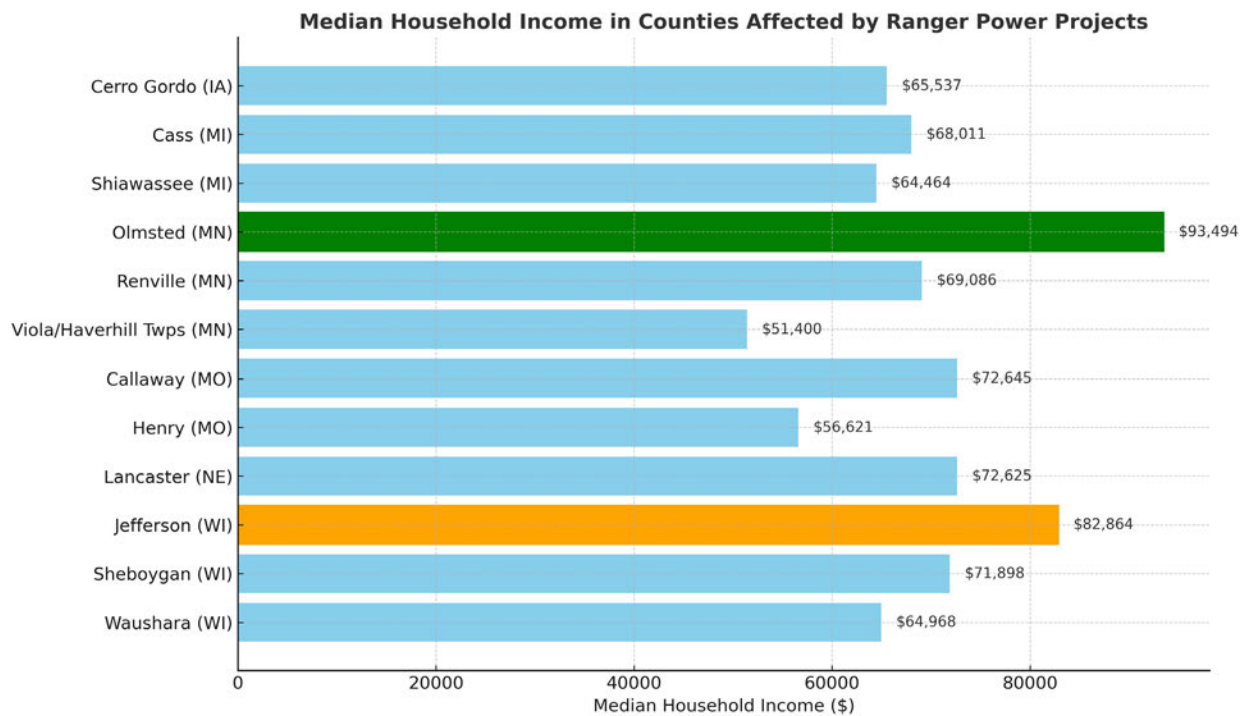
These factors make such counties politically weak but economically valuable soft targets, even though the land itself is not cheap.

Median Household Income in Counties Affected by Ranger Power Projects

This chart compares the median household incomes of counties affected by Ranger Power projects across Minnesota, Iowa, Nebraska, Missouri, and Michigan.

Jefferson County, WI (orange) shows a higher income due to commuting access to Madison and Milwaukee plus local industry.

Olmsted County, MN (green) is inflated by Mayo Clinic salaries in Rochester, while rural townships like Viola and Haverhill are about 45% lower.



🚗 Strategic Targeting Summary – Ranger Power 🚗

Ranger Power's siting of solar projects in rural Republican-leaning counties is not about finding cheap land. Farmland in counties like Olmsted, Renville, and Lancaster is among the most expensive in the Midwest. The strategy hinges on leases, not purchases: landowners receive steady income while developers avoid the true cost of land ownership.

Key Factors Behind Targeting

- **Lease Economics:** Expensive farmland doesn't deter Ranger Power, since long-term leases shift costs to landowners. Landowners accept for guaranteed income, even if it undercuts community interests.
- **Fragmented Opposition:** Rural populations are sparse and scattered, making grassroots organizing difficult. Residents often work long hours or multiple jobs, limiting civic engagement.
- **Weak Local Governments:** Township boards and county commissions are part-time and underfunded. Developers arrive with legal and financial resources far beyond local capacity.
- **State Preemption:** Laws and commissions in Minnesota, Iowa, Wisconsin, and elsewhere override local decision-making. Even Republican-led county governments can't stop projects if state regulators impose them.
- **Political Shielding:** Opposition framed as 'Republicans resisting clean energy' is politically safer for developers. Targeting rural white counties avoids the Title VI scrutiny that would apply in urban or minority communities.
- **Tax Base Incentives:** Struggling counties with small budgets are more easily enticed by promised tax revenue.

Bottom Line

Ranger Power targets expensive farmland in rural, Republican-leaning counties because these areas combine:

- Willing landowners attracted by lease income
- Dispersed populations with limited organizing capacity
- Weak local governments and stripped authority
- State-level mandates that override objections

These factors make such counties politically weak but economically valuable soft targets, even though the land itself is not cheap.

(b)(6) Privacy, (b)(7)(C) En – Protect Our Groundwater ■

PUC Docket (b)(6) Privacy, (b)(7)(C) En

Draft Accountability Questions Letter

Date: September 27, 2025

To: U.S. Environmental Protection Agency (EPA)

Re: Questions Regarding Groundwater Protection and Liability

I. Introduction

We, the Viola community, are writing to seek clarity regarding potential risks associated with the Lemon Hill Solar Project. Specifically, we have concerns about the long-term effects of frost heave on solar piles and the possibility of groundwater contamination. Because this project is located in an area that shares aquifers with residents of Rochester, Mayo Clinic, and Viola Township, we believe it is important to understand in advance how accountability will be determined if harm occurs.

II. Questions for Clarification

1. Groundwater Risks - If solar piles shift due to frost heave and cause contamination of shared groundwater resources, who would be legally responsible? - What protections are in place to ensure that contamination does not occur? 2. Civil and Criminal Liability - Would participating landowners bear any civil liability for environmental damage or harm to public health? - Could landowners or project partners face potential criminal liability under Minnesota law if contamination results in sickness or death? 3. Contractual Disclosures - What does Ranger Power's contract specifically state about liability in the event of future groundwater contamination? - Are there indemnification clauses that protect landowners, or do these risks remain with the individual signers? 4. Public Policy and Oversight - How are state agencies, including the Minnesota Public Utilities Commission, addressing the potential risks of frost heave and groundwater contamination in their review? - What accountability mechanisms exist if safeguards fail?

III. Request for Transparency

We respectfully request that the EPA provide clear, written responses to these questions. Our intent is to better understand how liability is allocated and what protections exist for landowners, residents, and surrounding communities.

IV. Conclusion

These questions are asked in the spirit of transparency and accountability. We believe it is in the public interest to ensure that responsibilities are clearly defined before construction begins, so that no party is unknowingly exposed to civil lawsuits, criminal prosecution, or preventable harm to shared groundwater resources.