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IOWA UTILITIES BOARD

The Honorable Governor Kim Reynolds

Senator Dennis Guth

Representative Henry Stone

#### Iowa Utilities Board

On behalf of the citizens of Emmet County and the state of Iowa, we write today to register our concerns and unanimous opposition to the CO2 pipeline projects proposed by Summit and Navigator (IUB Docket # HLP-2021-0001 and IUB Docket # HLP-2021-0003). While many of the lesser concerns can and will be addressed by the private investor's checkbook, we offer these three irreconcilable issues that will have lasting effect and do irreparable damage to our county's agricultural welfare and ownership rights.

**DRAINAGE:** The largest industry in Emmet County and our neighboring counties is agriculture. The rights of land owners to have, maintain, and improve drainage is critical to their success. Drainage tile is designed and installed based on grade and elevation, the option of going around future pipelines is not available. This proposed project will allow private investors to profit while limiting future improvements and productivity of the land. Additionally, it is inevitable that there will be damage to existing drainage tile and without appropriate legislation on the state and county levels, there is no protection for the private tile already installed.

**SAFETY:** Our primary responsibility as elected officials of this county is to protect and stand for the safety of our citizens. This means not only protecting them from unnecessary risks but also preparing for an unfortunate event that might bring harm. While the merits of this project are a topic addressed later, planning for response to an accidental discharge of the concentrated CO2 will require additional training at great expense to our county. Our regional Hazmat team is located in Mason City, approximately 2 hours away, and even though our volunteer fire fighters and first responders are well trained and equipped, they are not prepared to provide the urgent response needed if a problem with the pipeline would occur. The proposed route for the Navigator line would travel approximately 6 miles south of our second largest incorporated community Armstrong, and just north of our third, that of Ringsted. In their presentation, the Navigator representatives stated that they had chosen routes to avoid large population densities but in Emmet, 2/5<sup>th</sup> of our entire population lies in the path.

**INFRASTRUCTURE AND FUTURE DEVELOPMENT:** Emmet County continues to be limited by available infrastructure for future industrial development. Even though we have documented some of the strongest wind resource in the state and host the nationally known Wind Industry program at Iowa Lakes Community College, we have only two towers in the county. One is privately owned to service a livestock feeding operation and the other is the training turbine at ILCC. Emmet County has been overlooked because we do not have connection to and

Jeff Quastad, Chair   Tim Schumacher, Vice-Chair   John Pluth   Todd Glasnapp   Lisa K. Hansen



are not close enough to the "Grid". We are also overlooked as our natural gas supply will not support increased usage by an industrial venture. The installation of the two pipelines to support the travel through Emmet again represents usage without benefit to our county. These pipelines will further impede the installation and placement of the much needed infrastructure, that of fiber optics, gas, and electric both in and out of the county.

With respect to landowner rights, the use of the eminent domain/condemnation process to acquire easements for the private investors will destroy the rights of the land owners. We hold grave concerns for the precedence it will set and further how those easements might transfer through legal channels to others without consideration for the land owners. The definition of property ownership will be challenged if this private venture is allowed to proceed. The benefits to the general population derived by eminent domain are far different than what will be established by this private interest.

Finally, we would like to address the merits or lack of same that this project represents. While we understand that the production of Ethanol as a benefit to our agricultural industry, the need to pipe CO2 from the ethanol plants around but not in our county are less documented. An acre of corn requires eight tons of CO2 for its production. Iowa produces approximately 13.5 million acres of corn annually. The numbers don't lie; the pipelines designed to transport 15 million tons annually address only a small fraction of the CO2 actually naturally absorbed by our corn production. Production of corn is good for the environment. In addition, the Nitrous Oxide which is 282 times more hazardous to the environment is allowed to escape as there is less interest in protecting the environment from this harmful bi-product when compared to this unneeded pipeline which is merely a money maker for the investors. Environmentally, the entire project mirrors the credentials of the recent West Des Moines Water Works law suit against the three northwestern counties for damages caused by nitrogen entering the Raccoon river. When the facts were revealed, there was expense to remove the nitrogen but then what was removed was returned to the water downstream. The concerns for the environment were only an excuse for profit.

Thank you for your consideration of our concerns and other CO2 alternatives in "The Guardian" article. (See link below) Please know that we write to you on behalf of our citizens and appreciate your attention to this very important issue.

Sincerely,

Supervisor Jeff Quastad, Chair

Supervisor Todd Glasnapp

Supervisor Lisa Hansen

Supervisor John Pluth

Supervisor Tim Schumacher

<https://www.theguardian.com/environment/2021/dec/05/carbon-dioxide-co2-capture-utilisation-products-vodka-jet-fuel-protein>

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