



ACCREDITED  
ECONOMIC  
DEVELOPMENT  
ORGANIZATION  
International Economic Development Council



Charles City

Area Development Corporation

401 North Main Street  
Charles City, Iowa 50616

641.228.3020

FAX: 641.228.4744

EMAIL: tfox@charlescityia.com

www.charlescityia.com

www.avenueofthesaints.com

26 October 2022

Iowa Utilities Board  
1375 East Court Avenue  
Des Moines, Iowa 50315

RE: Docket No. HLP-2021-001 Summit Carbon Solutions Petition for Hazardous Liquid Pipeline Permit

Dear IUB Members Byrnes, Huser, Lozier, Jr.:

This day the Board of Directors of the Charles City Area Development Corporation endorsed submission of the comments following to IUB.

While we are overall neutral on the carbon sequestration pipeline issue, we hold substantive concerns pertaining to its *location*. In 2020 CCADC purchased 75.34 acres of farmland for \$2,156,000 of taxpayer dollars and christened it the Avenue of the Saints Development Park. It is situated immediately adjacent egress/ingress #218 on the four-lane Avenue of the Saints thoroughfare connecting St. Paul and St. Louis. Given its proximity to the Avenue, we deem this one of the most marketable industrial sites in the Midwest.

Furthermore, the site has been accredited within the Iowa Certified Sites program. It is one of 29 certified sites in Iowa. This suggests that all engineering, utilities, cultural, environmental, geotechnical, etc. due diligence has been performed and that the site is shovel ready.

The proposed Summit Carbon Solutions sequestration line is scheduled to bisect the Avenue of the Saints Park. We hold that this action would obviate the marketability of this property. Not only does it render the developmental suitability of the northernmost 24 acres practically naught, but we also have no means to measure the potentially nullifying impacts the presence of a sequestration line would have upon sales potential. Corporate concerns regarding safety or site layout or constructability may override the superior qualities of the site – especially when it comes down to relatively equal sites, one having a pipeline and one without.

A sequestration pipeline traversing the Avenue of the Saints Development Park negatively impacts the economic vitality of the state of Iowa. The community has worked extraordinarily hard in developing a marketable site. We feel the site shall be exponentially more difficult to market and sell given the pipeline presence.

Also to be considered is the propinquity of the proposed pipeline to population concentrations of Charles City, Iowa. It is to run by a very nice long held family farm, the Cedar Valley Transportation Center, two nursing homes, a grocery store, one of the largest automobile dealerships in Iowa, two hotels, a strip mall, a dental office, a potential site of a Career Academy, a bank, and is one-half mile from the Floyd County Medical Center and Charley Western Recreational Trail. Pipeline siting is clearly too close to densely populated areas from safety perspectives.

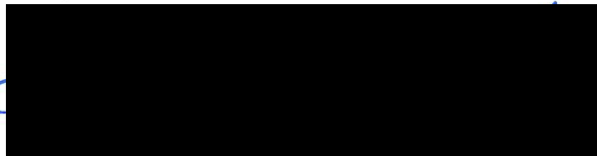
Another consideration is Summit Carbon Solutions proposed sequestration pipeline proximity vis-a-vis the Southwest Development Park [one mile west of the Avenue of the Saints Development Park]. The proposed route runs adjacent the Southwest Development Park.

Park tenants include CDI, LLC, Custom Wood Products, Inc., F & H Aluminum, Inc., Trelleborg and two Winnebago Industries, Inc. facilities. Northerly across 11 Street are Floyd County's two largest employers, Cambrex Charles City, Inc., and Zoetis.

Therefore, a concentration of approximately 1,278 [counting all shifts] employees is evident abutting the pipeline route. Clearly from a public safety perspective this condition is untenable.

Thank you for your consideration.

Sincerely,

A large black rectangular redaction box covering the signature of Timothy S. Fox.

Timothy S. Fox, MPP, CED, EDFP, PCED, Executive Director



Filed with the Iowa Utilities Board on November 1, 2022, HLP-2021-0001

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Docket No. HLP-2021-001  
1375 E Court Ave  
Des Moines IA 50319-0069

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