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January 11, 2023

Iowa Utilities Board  
1375 E. Court Ave.  
Des Moines, IA 50319

Dear Board Members:

RE: Wolf Carbon Solutions US LLC, Docket No. HLP-2022-0002

The Linn County Board of Supervisors submits this letter as our written comments on the proposal by Wolf Carbon Solutions US LLC (Wolf) to build and operate a carbon capture pipeline system in Iowa. Wolf's proposed pipeline route includes a roughly 16-mile-long corridor through Linn County starting at the ADM dry corn milling plant in southwest Cedar Rapids and extending east to the county line.

We acknowledge that the use of eminent domain may be suitable for specific, individual public use, public purpose, or public improvement projects. However, we also believe that the authority to take private property for a public use must be limited to projects that serve the entire public and that the unrestrained, unjustified, or improper use of eminent domain undermines private property rights by forcing landowners to grant easements unwillingly. We object strenuously to the use of eminent domain for the proposed Wolf carbon capture pipeline system and urge you to deny its use if Wolf files a request to do so. Wolf claims that its proposed carbon capture system will serve the entire public by providing environmental benefits and helping to achieve carbon reduction goals. However, unlike regulated utilities, carbon capture pipelines are not granted a franchise to provide a service that benefits the entire public in a designated service area. Instead, the pipeline will benefit only private companies, at public expense using federal tax credits, without providing a service to the entire public.

Further, we have serious concerns about the long-term loss to the economic value of agricultural property used by a hazardous liquid pipeline caused by factors including the improper restoration of land and drainage systems, which has previously demonstrated negative effects on long-term soil health and productivity. Additionally, the presence of hazardous liquid pipelines can have severe impacts on the value of residential and commercial property by limiting its use and making it less attractive to buyers.

Finally, and perhaps most importantly, we have deep concerns about the significant risk to the health and safety of the public that the proposed pipeline is purported to benefit. Although we value ADM's important role in the local and regional economy, regarding Wolf's pipeline proposal we believe that the financial and human cost of the health and safety risks to landowners and neighboring residents, schools, and other places of public assembly outweighs the benefit of potential job creation and economic growth.

Thank you for your attention to this letter, we appreciate your time and consideration.

Sincerely,

A black rectangular redaction box covering the signature of Ben Rogers.

Ben Rogers

A black rectangular redaction box covering the signature of Kirsten Running-Marquardt.

Kirsten Running-Marquardt

A black rectangular redaction box covering the signature of Louis J. Zumbach.

Louis J. Zumbach